

**Boise City and Garden
City, Idaho Area
NPDES Stormwater MS4
Permit**

REAPPLICATION

Permit No. IDS-02756-1

October 18, 2004

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Summary

Within the Boise City and Garden City limits, public organizations responsible for operating and maintaining municipal separate storm sewer systems (MS4s) are required to obtain a Phase I National Pollution Discharge Elimination System (NPDES) permit to discharge stormwater to waters of the United States. The Environmental Protection Agency (EPA), Region 10 issued a permit for the Boise City and Garden City, Idaho area that became effective in November 2000 and will expire next year (November 2005). The jurisdictions that comprise this permit include: the Ada County Highway District, Boise City, Garden City, Ada County Drainage District 3, Boise State University, and District 3 of the Idaho Transportation Department.

These entities are required to develop a stormwater management program designed to prevent pollutants from being washed by stormwater runoff into the MS4 (or from being released directly into the MS4), then discharged from the MS4 into local waterbodies to the maximum extent practicable (MEP) standard. The MEP standard emphasizes pollution prevention source control measures with structural or system treatment methods serving as a back up. The stormwater management programs include measures to:

- Identify major outfalls and pollutant loadings;
- Detect and remove illicit discharges and improper disposal into the MS4;
- Reduce pollutants in runoff from industrial, commercial, and residential areas; and
- Control stormwater discharges from new development and redevelopment areas e.g. construction sites.

The copermittees have evaluated their respective programs and prepared a joint reapplication that includes identification of activities that will continue to be implemented and recommendations for program enhancements or changes. While program enhancements are being recommended, no major changes are proposed.

The copermittees also implement a cooperative monitoring program, required by the NPDES Permit, which includes outfall monitoring, floatables (litter) monitoring, and analysis of liquids and sediment removed from drop inlets. Recommendations for monitoring activities during the next permit cycle include discontinuing of analysis for some pollutants that have not been detected or present at concentrations below EPA criteria or state water quality standards and the addition of several other parameters not currently monitored. These recommendations would result in the analysis of fewer parameters, with a decrease in monitoring costs.

Other recommended changes include the removal of language imposing joint and several liability on all copermittees. Additional recommendations help clarify the intent of conditions included in the existing permit.

A. Introduction

This stormwater management plan was developed to comply with the National Pollutant Discharge Elimination System (NPDES) permit regulations for municipal stormwater discharges, as contained in 40 CFR 122.26 (d)(2), Section (iv), the reapplication requirements described in FR Vol. 61, No. 155, pp. 41698-41699, and requirements associated with applicable Total Maximum Daily Loads (TMDL), as contained in 40 CFR 130.7.

This management plan proposes activities for the second permit cycle, to be conducted individually and cooperatively by the following six co-permittees: Ada County Highway District (ACHD), Boise City, Ada County Drainage District #3 (DD3), Boise State University (BSU), Garden City, and District 3 of the Idaho Transportation Department (ITD). Agency names, mailing addresses, and technical contacts are provided as follows:

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Within the permit area, ACHD owns and operates all public roadways and associated storm water conveyances except routes and storm water facilities operated by District 3 of ITD (I-84; I-184; Highways 20, 21, 26, 30, and 44; Glenwood Street; Chinden Boulevard; and the Chinden-Broadway Connector). In addition to facilities that are owned by the City of Boise, Boise City has jurisdiction over private property within its city limits and maintains four major

floodway conveyances from the Boise foothills to the Boise River (Hulls Gulch, Cottonwood Creek, Sand Creek, and Crane Creek). Garden City has jurisdiction over private property and city-owned facilities within its city limits. DD3 owns and operates drainage channels and drain pipes in the southeast section of town. Southeast Boise entails an older, fully developed area in and around BSU and a rapidly growing area that is emphasized for development under Boise City's Comprehensive Plan. DD3 receives drainage from storm drains under the control of ACHD, irrigation run-off from irrigated land and irrigation canals, and drainage from residential and commercial development (previously irrigated lands) which discharge directly into DD3's facilities. Finally, BSU is responsible for the state-owned university land adjacent to the Boise River south of Julia Davis Park. A map delineating the permit area and co-permittee jurisdictional boundaries is located in Attachment A.

Since the Part 1 NPDES Permit Application was submitted to the U.S. Environmental Protection Agency (EPA), the EPA has approved a Total Maximum Daily Load (TMDL) for sediments and bacteria for the lower Boise River. Section 303(d) of the federal Clean Water Act (CWA) requires states to develop a TMDL management plan for waterbodies that are water quality limited. The goal of the CWA TMDL program is to correct water quality impairments and achieve beneficial uses of water bodies through attainment of water quality standards. To achieve this goal, EPA approved a TMDL in 2000 and the *Implementation Plan for the Lower Boise River Total Maximum Daily Load* was developed to guide the stakeholders, including the co-permittees, toward meeting TMDL requirements.

The lower Boise River TMDL and implementation plan state that the total suspended sediment targets are met upstream from Middleton. The three contributing areas that originate within the Boise City permit area (Riparian Area #1, Eagle Drain, and Thurman Drain) upstream of Middleton are assigned sediment loads equal to the 1995 loads used to develop the TMDL. The implementation plan states "implementation of Phase I stormwater requirements are expected to be sufficient to meet the goals of the TMDL". Additionally, the implementation plan states that, for those sources of *E. coli* that are required to comply with NPDES Phase I or Phase II stormwater requirements, "implementing stormwater protections included in these NPDES permits is expected to be sufficient to meet the bacteria-reduction goals of the TMDL".

Also in the NPDES permit area, the upper reaches of Five Mile Creek (ID17050114SW010_02) were assessed and reported in the 2002/2003 Integrated 303(d)/305(b) Report as not supporting secondary contact recreation due to pathogens. A modified Aquatic Life Use has been proposed for this segment, which would show this segment as full supporting. A TMDL has not been completed.

The objective of the following combined co-permittees' Stormwater Management Plans is to satisfy the NPDES regulatory requirements for stormwater management programs and to allow each co-permittee the opportunity to implement a stormwater management program that is tailored to suit the individual and unique need and condition of the area to be permitted. Detailed descriptive information for each of the co-permittees is contained in their individual stormwater management plans following this introduction. Subsequent sections include proposed changes to monitoring program elements and other suggested permit changes.

B. Proposed Stormwater Management Program Elements and Schedule

Each of the following co-permittee stormwater management plans includes information about the program area/permit requirement that applies to the respective co-permittee, including information about ongoing activities and new activities or program enhancements proposed for the second permit term. Boise City is the lead co-permittee in the implementation of the public education program and the proposed activities for this program element are described in Appendix C. Funding among the co-permittees for the joint education activities varies according to an intergovernmental cost share agreement. Participation in these educational activities, which may consist of co-permittee staff time or other indirect support, differs according to each co-permittees needs and resources. Activities done and proposed by co-permittees in addition to those discussed in the Appendix C are included in their respective plans

Ada County Highway District

Introduction

ACHD is the lead co-permittee for the NPDES permit program, due to their responsibility for operation and maintenance of the greater part of the Boise City and Garden City area municipal storm drain system. As such, ACHD is responsible for the overall administrative duties of the program, preparing and submitting annual reports to the EPA, and conducting ongoing coordination with EPA and the co-permittees.

This stormwater management plan for the ACHD describes activities that have been conducted during the first permit period to comply with conditions of the NPDES permit and program enhancements to improve the effectiveness of the stormwater management program during the next permit period.

1. Structural Controls

Design Manual

Permit Condition A.1.a. Co-permittees shall adopt design manuals that incorporate Best Management Practices (BMPs) and operation and maintenance criteria for all existing and future structural controls under the jurisdiction of the co-permittees. This requirement may be satisfied by adopting by reference all or elements of the design manuals and guidebooks developed by other co-permittees, including the January 1997 Boise Storm Water Best Management Practices Guidebook, the July 1994 ITD Catalog of Storm Water Best Management practices, the June 1999 City of Boise Storm Water Management Design Manual, and the December 1999 ACHD Development Policy Manual.

Existing Program/Activity Description

The revision of the *ACHD Policy Manual* by the ACHD Drainage Division is ongoing. Specific structural BMPs will be adopted through inclusion in the ACHD Supplement to the *Idaho Standards for Public Works Construction*. Most of the standards are derived from existing Boise City or Idaho Department of Environmental Quality (IDEQ) standards and have been updated to show current ACHD maintenance requirements and standards.

Additionally, the copermittees, in conjunction with the IDEQ, plan to revise and update the BMP Manual. The revised document is anticipated to be completed during FY 2005.

Proposed Changes for Second Permit Cycle

No changes are recommended for the next permit cycle.

Operation and Maintenance

Permit Condition A.1.b. Operation and Maintenance Program. Co-permittees shall develop and implement an operation and maintenance program, to include the following:

- *Definitive inspection and maintenance schedules for all co-permittee-owned structural controls which include the frequency of routine inspections. Actual inspections shall also be tracked.*
- *Guidelines and criteria for maintenance activities that are to be implemented for co-permittee-owned structural controls, as well as a description of the maintenance activities required such as “disposal of sediment” and “removal of debris.”*
- *A description of the inspection, operation, and maintenance of storm water retention facilities owned or operated by co-permittees.*

Existing Program/Activity Description

The ACHD Maintenance and Operations (M&O) Department maintains structural controls owned and operated by ACHD. Information about these activities can be found in the maintenance schedule/map and ACHD’s *Operation and Maintenance Storm Water Best Management Practices Manual* (September 2002), provided in past annual reports. A new database to track maintenance activities was instituted in October 2003.

Proposed Changes for Second Permit Cycle

No changes are recommended for the next permit cycle.

Record Keeping

Permit Conditions A.1.c. Inspection and Maintenance Record Keeping. Each co-permittee that owns or operates structural controls shall maintain an internal record-keeping system to track inspections and maintenance for those portions of the MS4 operated by the co-permittee.

Existing Program/Activity Description

Inspection and maintenance activity records can be found in the annual reports for the respective reporting year.

Proposed Changes for Second Permit Cycle

No changes are recommended for the next permit cycle.

Floatables

Permit Condition A.2.c. The co-permittees shall ensure that the streets for which they have maintenance authority and responsibility are swept as needed to reduce the discharge of pollutants to the MEP. Co-permittees shall compile a report on the sweeping activity and shall assess the above levels of effort in each of the designated land use type areas with respect to the mitigation of contribution of pollutants from the highways and other public areas that are maintained.

Existing Program/Activity Description

ACHD maintains a fleet of seven vacuum sweepers, assigned to regular routes that are swept every two weeks. ACHD has seven mechanical sweepers that are used for sweeping in the county with the frequency determined by specific areas. Records of sweeping activities are included in previous annual reports.

Proposed Changes for Second Permit Cycle

Implementation of this requirement has been effective. Program enhancements for the next permit cycle include a trial study of one or more floatable BMPs at one or more outfall sites (e.g. outfall nets).

2. Areas of New Development and Redevelopment

Permit Condition A.3.a. Each co-permittee shall develop and finalize a design manual incorporating BMPs or adopt for use the BMPs prepared by another approved sources.

Permit Condition A.3.b. Project review and approval procedures shall be developed that include the ability to conduct inspections and follow-up after construction to ensure that approved Operation and Maintenance plans are being followed.

Permit Condition A.3.c. Co-permittees shall develop and maintain an internal record keeping system to track all activity on project review and approval actions.

Existing Program/Activity Description

Comprehensive plans are developed by the local municipal governments and considered by ACHD to the extent practicable. ACHD develops stormwater facility master plans and performs studies to identify needs and requirements for new development or upgrades to existing facilities within those areas.

The ACHD Right-Of -Way & Development Services Department (ROWDS) performs design review for projects affecting the public right of way. The ACHD *Development Policy Manual* contains project review and approval procedures. The Engineer of Record must ensure that roadway facilities, including roadway drainage facilities, are constructed correctly and must prepare a set of “record drawings” of the final system. The ROWDS development review database was created for ACHD Development Review staff in March 2002. Information being tracked in this database is summarized in previous annual reports.

ACHD staff performs an inspection of the roadway and associated drainage facilities before final acceptance of newly constructed subdivision roadways. During the past year, ACHD Construction Services Division and Drainage Division staffs have performed these inspections.

In Boise City, ACHD defers to the standards for stormwater quality treatment contained in the Boise City *Stormwater Management Design Manual* for residential, commercial, or industrial development. ACHD imposes additional maintenance and design requirements if maintenance of a stormwater system will become the responsibility of ACHD or if existing stormwater infrastructures owned and operated by ACHD are to be impacted. These requirements are described in the current edition of the *ACHD Development Policy Manual*.

Proposed Changes for Second Permit Cycle

Program refinements will be made as needed. No permit changes are recommended.

3. Roadways

Permit Condition A.4.a. Co-permittees shall develop a management practices program. This program shall include those management practices identified during the inventory of co-permittee-owned storm water facilities and audit of site activities undertaken as part of the application for the MS4 Permit. This program shall also evaluate ways to reduce pollutant discharges associated with road maintenance and rehabilitation operations.

Permit Condition A.4.b. C-permittees shall monitor the application of chemicals and sand applied to roadways for snow and ice control. Co-permittees shall implement programs for proper storage of de-icing materials to prevent materials from entering the storm sewer system, and research alternatives to salt for use in de-icing.

Existing Program/Activity Description

Implementation of the *ACHD Operation and Maintenance Storm Water Best Management Practices Manual* began in December 2002. Implementation of a training program will begin early in the fifth permit year.

The ACHD Snow and Ice Control and Removal Program activities continue as described in the second annual report. The results of an investigation of storage options and de-icing alternatives, *A Review of Information Regarding Alternative Road Deicers and Deicer Storage Options* (July 2003), was included in the previous annual report.

Proposed Changes for Second Permit Cycle

ACHD will modify roadway activities based on the results of activity audits. No permit changes are recommended.

4. Flood Management

Permit Condition A.5.a. Co-permittees shall complete an inventory of all existing structural flood control devices within their jurisdictions to determine the feasibility of retrofitting them to provide additional pollutant removal.

Permit Condition A.5.b. Co-permittees shall develop procedures to assure that flood management projects assess the impacts on the water quality of the receiving water.

Existing Program/Activity Description

The inventory of existing structural flood control devices has been completed. The ACHD GIS Division updates the Cartegraph database as new structures become part of ACHD's system.

ACHD conducts video inspections of underground storm drainage facilities as needed. Systems are investigated for future roadway projects and potential retrofit projects to improve storm drainage water quality. The video inspections help staff determine structural integrity of the pipe, presence of abandoned unused facilities, and/or presence of illicit connections.

A prioritization process has been developed for drainage quantity problems and is being used on a trial basis. Once finalized, the process may be modified to address retrofit opportunities relating to water quality.

Proposed Changes for Second Permit Cycle

ACHD will continue efforts to address existing requirements and implement an assessment of flood control facilities for retrofit opportunities as resources allow. No permit changes are recommended.

5. Illicit Discharges and Improper Disposal

Permit Condition A.7. Each co-permittee shall implement an ongoing program to detect and remove illicit discharges and improper disposal into the MS4. Each co-permittee shall prevent unpermitted discharges of dry and wet weather overflows from sanitary sewers into the MS4. Each co-permittee shall limit the infiltration of seepage from sanitary sewers into the MS4.

Permit Condition A.7.a. Co-permittees shall work together to implement a program to inspect and enforce against illicit connections. The program shall include a requirement to update the inventory of all major outfalls within the jurisdictions of the co-permittees.

Permit Condition A.7.c. Co-permittees shall implement complaint investigation procedures to guide staff through recording, investigating and following up on complaints regarding violations reported by the general public.

Existing Program/Activity Description

The Drainage Division oversees the Illicit Discharge Program and responds to hazardous materials incidents and/or large complex spills. The Construction Division Zone Inspectors address complaints if they are able or refer them to Drainage Division staff. Activities and procedures of the program are described in the *Stormwater Investigation Manual (2000)*. A summary of the complaints and responses is provided in each annual report. ACHD cooperates with co-permittees to address discharges that affect the ACHD right of way. Enforcement agreements have been developed with Boise City (2002) and Garden City (2004).

The ACHD Drainage Division oversees the inventory of major outfalls. Major outfalls within the Boise City and Garden City limits were inventoried as part of the Part 2 NPDES permit application (November 1994). The inventory is updated yearly to include any new major outfalls that become part of the MS4. ACHD continues to delineate the stormwater watersheds of the permit area to better understand the source and conveyance of the waters flowing to the major outfalls. Watersheds are mapped in the field and then transferred into an electronic format using ArcView GIS software. This work is estimated for completion in fall of 2005. Dry weather field screening of outfalls has been completed for 80% of the outfalls.

Proposed Changes for Second Permit Cycle

In order to also address Phase II requirements, recommended program enhancements include:

- More publicizing of the hotline
- ACHD will assume primary responsibility for the hotline with expanded countywide coverage

6. Spill Response and Prevention

Permit Condition A.8.a. Co-permittees shall participate in an interagency spill response task group to ensure that a coordinated response to spills is achieved and that impacts upon aquatic resources from spilled pollutants are controlled to the MEP.

Existing Program/Activity Description

ACHD staff participates in the quarterly meetings of the Ada County Local Emergency Planning Committee (LEPC), which is composed of representatives from local police departments, fire departments, hospitals, businesses, amateur radio operators, local government entities, and utility companies.

Proposed Changes for Second Permit Cycle

Attendance of spill response task group meetings has provided limited benefit. Training for ACHD staff on spill prevention and response is recommended as a program enhancement during the next permit cycle.

7. Industrial and High Risk Runoff

Permit Condition A.9.a Database of Facilities. Develop and maintain a database of priority industrial site.

Permit Condition A.9.b. Inspection and Monitoring of High Risk Facilities. Inspect and monitor such facility for compliance with the storm water ordinance and the NPDES industrial storm water general permit.

Permit Condition A.9.c. Educational Materials. Distribute the Storm Water Commercial and Industrial Best Management Practices Handbook with inspections.

Permit Condition A.9.d. Inspection Program. Implement an inspection program of high risk industrial and other commercial facilities.

Existing Program/Activity Description

The ACHD Drainage Division oversees this program. A Professional Advisory Group (PAG) has identified inspection priorities. To date, inspection activities have been limited to high-risk facilities. The Industrial Program guidance manual has been updated with information provided through PAG input and knowledge gained during inspections.

ACHD has hired a consultant who has been working with Boise City and Garden City to develop a database that is compatible with existing databases. This database should be operational by the end of permit year four. Details of this program are provided in the annual reports.

Proposed Changes for Second Permit Cycle

Program refinements will be made as needed. No permit changes are recommended.

8. Construction Site Runoff

Permit Condition A.10.a. Co-permittees shall implement a Construction Site Discharge Control Program 18 months from the effective date of the permit.

Permit Condition A.10.b. Co-permittees shall conduct inspection of construction sites to ensure compliance with the measures outlined in II.A.10(a).

Permit Condition A.10.c. Co-permittees shall develop and maintain a database of all active and completed construction sites permitted within their jurisdiction and completed during the term of this permit.

Existing Program/Activity Description

The ACHD Drainage Division oversees the implementation of the Construction Site Discharge Control Program, reviews all the erosion and sediment control (ESC) plans submitted with Right of Way Permit applications, and provides education to other ACHD staff on ESC issues and Construction General Permit requirements for ACHD road building and maintenance projects. The Construction Division is responsible for inspection ESC activities in the ACHD right of way.

Proposed Changes for Second Permit Cycle

Implementation of this requirement has been effective given limited ACHD staff resources. Program enhancements recommended for the next permit cycle include staff training, certification curriculum updates, and pursuing additional legal authorities. No permit changes are recommended.

9. Public Education

Permit Condition A.11.a. Public Education Program. Implement a program to inform the public of the impact of pollutants in storm water.

Existing Program/Activity Description

ACHD participates with co-permittees on education and outreach activities. ACHD develops fact sheets and other educational materials for those activities that affect or have the potential to affect the ACHD right of way. Examples include fact sheets for restaurant maintenance and housekeeping, sidewalk maintenance and housekeeping, and landscaping.

Proposed Changes for Second Permit Cycle

ACHD proposes to develop a countywide education program to provide consistency across its jurisdiction, to comply with both Phase I and Phase II requirements, and to better focus limited resources on activities that address ACHD's needs and priorities. ACHD will coordinate these activities as needed with the other co-permittees.

Pesticide, Herbicide, and Fertilizer Application

Permit Condition A.6.a. Application Management. Co-permittees shall develop a list of regionally appropriate landscaping plants and turf with recommended fertilizer application rates. Establish planting/landscape policies which encourage use of vegetation that is self sustainable without pesticides or fertilizers..

Permit Condition A.6.b. Distribution of Educational Materials. Co-permittees shall distribute educational materials to all contracted applicators.

Existing Program/Activity Description

ACHD has addressed pesticide, herbicide and fertilizer application activities relating to the public right of way through the development of education and outreach materials for mosquito abatement activities and the use of a *Pest Management Log* (November 2002) by ACHD facility maintenance staff. ACHD is working toward developing an *Agreement for General and Noxious Weed*

Control between ACHD and Ada County Weed Control that will address water quality issues.

Proposed Changes for Second Permit Cycle

No permit changes are recommended.

Floatables

Permit Condition A.2.b. The co-permittees shall implement a program or programs, such as the Adopt-a-Highway program, to facilitate litter removal from selected highways two times a year or as needed.

Existing Program/Activity Description

The ACHD M&O Department implements the Adopt-a-Highway Program in rural areas of Ada County and a cooperative effort with the Ada County Sheriff's Inmate Labor Detail (SILD) Program. ACHD staff disposes of trash collected along roadways by the SILD Program and transports them to the Ada County Landfill. This partnership has been in place for the last five years.

Proposed Changes for Second Permit Cycle

Implementation of this requirement has been effective. Program enhancements for the next permit cycle may include working with entities to reduce litter associated with trash pickup in the ACHD right of way

ACHD also recommends eliminating the permit requirement for the Adopt-a-Highway Program because there are a limited number of roads that are eligible for this Program in the permit area. The Program will continue to be implemented even though it is not a permit requirement.

Boise City

Introduction

The City of Boise (City) is to implement an individual Stormwater Management Program (SWMP) as specified in 40CRF122.26 designed to limit, to the Maximum Extent Practicable (MEP), the discharge of pollutants from the City's jurisdiction to the Boise Municipal Separate Storm Sewer System (Boise MS4). The City's individual SWMP employs best management practices (BMPs) including schedules of activities, prohibitions of practices, maintenance procedures, treatment requirements, operating procedures, education, training, and other management practices to control site runoff, spillage or leaks, waste disposal, or drainage from raw material storage.

In addition to the individual SWMP to be implemented within the City's jurisdiction, the City also is to cooperate with the other Boise MS4 copermittees to implement a limited number of joint permit requirements. These joint permit requirements include an intergovernmental coordination agreement that specifies roles and responsibilities for permit administration, water quality monitoring, and permit-wide education and outreach. These joint permit requirements have been addressed either here in Appendix A (joint public education and outreach) or other sections of this re-application package.

The final permit-wide Boise SWMP will be identified in the issued NPDES permit (permit) to be updated as necessary, or as required by the Regional Administrator of the EPA, to ensure compliance with Section 402(p)(3)(B) of the Clean Water Act, 33 U.S.C. § 1342(p)(3)(B). The issued permit is expected to clearly identify both individual SWMPs for each of the Co-Permittees as well as a limited number of joint permit requirements to be implemented through intergovernmental coordination.

Attainment of Water Quality Standards

The permit re-application provides the City an important opportunity to review the local stormwater management goals and to refine the City's SWMP and associated BMPs to meet the federal regulations and needs of our local jurisdiction.

The goal of the City's SWMP is to maintain the existing good water quality of the receiving water bodies, including the Lower Boise River (LBR)¹. One of the ways to ensure ongoing attainment of these and other water quality goals is to review

¹ In the April 2000 Draft Boise Stormwater NPDES Permit and Fact Sheet the EPA encouraged the Co-Permittees) to consider the following water quality goals: (1) no discharge of toxics in toxic amounts; (2) no discharge of floatable debris, oils, scum, foam, or grease in other than trace amounts; (3) no discharge of non-stormwater from the MS4, except in accordance with...the permit; and, (4) no degradation or loss of State designated beneficial uses of receiving waters as a result of stormwater discharges from the MS4 unless authorized by the State in accordance with the State's Anti-degradation Policy.

the existing and long-term trend data for stormwater impacts on receiving water quality and pollutant load targets, surface and ground water quality standards, and other requirements specific to the local area.

Water quality data obtained for the LBR by the City were included in the 2003 City Stormwater Annual Report (2003 report). These data demonstrate overall attainment of current water quality standards and objectives of the LBR. More detailed narrative descriptions of phosphorus, temperature, sediment, and bacteria were also presented in the 2003 report because they are addressed by either the LBR TMDL (approved in January 2000) or in other TMDLs that affect the LBR (e.g., Snake River-Hells Canyon (SR-HC) or the LBR tributaries). Through active participation in these and other local water quality planning efforts the City intends to continue to review and collect data, as needed, to inform the City and Boise MS4 Co-Permittees on current and future water quality issues.

Boise SWMP Evaluation

The effectiveness of the proposed City SWMP for the categories of pollutants found in local stormwater discharges have been evaluated during the development of the permit re-application. These pollutants and associated evaluations are presented in Attachment B, Table B1.

The evaluation of the proposed City SWMP indicates that all of the components of the original stormwater management program are effective and should be continued in conjunction with some minor revised program assessment measures. The following components are addressed in the proposed City's SWMP and proposed joint Boise Co-Permittee Education Plan:

- continued emphasis on public education programs, including programs on household hazardous waste
- continued emphasis on reducing sediment due to construction activities within the City's jurisdiction
- protective storm drain design criteria for all new development and retrofitting and/or upgrading of the existing stormwater facilities during significant re-development within the City's jurisdiction
- maintenance of the stormwater facilities owned and operated by the City
- continued coordination with adjacent MS4 jurisdictions (i.e., Boise MS4 Co-Permittees) on monitoring, education, and other efforts
- explore opportunities to use a watershed approach to stormwater management by seeking general authorization for pollutant trading under the next permit and participating in the Lower Boise Water Quality Management Plan and TMDL development and implementation process

Stormwater Management Program Elements and Schedule

The following Stormwater Management Plan (SWMP) BMPs have been identified to meet the City of Boise's (City's) federal stormwater requirements. These were identified in the original Boise MS4 NPDES permit and, with some minor modifications, are proposed to be continued by this re-application package. A summary of the minor modifications are included in Table 1 in Attachment C.

1. Structural Controls

Design Manual

Permit Condition Part II.A.1.a. Co-permittees shall adopt design manuals that incorporate Best Management Practices (BMPs) and operation and maintenance criteria for all existing and future structural controls under the jurisdiction of the co-permittees. This requirement may be satisfied by adopting by reference all or elements of the design manuals and guidebooks developed by other co-permittees, including the January 1997 Boise Storm Water Best Management Practices Guidebook, the July 1994 ITD Catalog of Storm Water Best Management practices, the June 1999 City of Boise Storm Water Management Design Manual, and the December 1999 ACHD Development Policy Manual.

Existing Program/Activity Description

STR BMP 1: Design Standards

The City proposes to continue the implementation of the adopted design manual (e.g., Boise Stormwater Management: A Design Manual) (design manual) and incorporate Best Management Practices (BMPs) and operation and maintenance criteria as identified in the Stormwater Operation and Maintenance: A Resource Guide (O&M resource guide) for future stormwater structural controls that are owned or operated by the City.²

The design manual, O&M resource guide, and associated Boise Stormwater Ordinance developed to implement this requirement have been based on sound engineering practices that utilize methods to control the addition of pollutants to stormwater runoff to the MEP and are consistent with the City's ongoing assessment of stormwater impacts on the water quality of the receiving water bodies.

STR BMP 1 Assessment Measures

- submit current documents (e.g., the design manual, O&M resource guide, and Stormwater Ordinance) and subsequent updates to the EPA with the first following annual report and make these documents available to the public through the City Stormwater web pages and Boise City Hall
- participate in the Lower Boise Water Quality Management Plan and TMDL development and implementation process

² Proposed BMPs for compliance with the design manual and O&M plan requirements for structural controls not owned or operated by the City of Boise are addressed under "Areas of New Development and Re-Development."

Operation and Maintenance

Permit Condition Part II.A.1.b. Operation and Maintenance Program. Co-permittees shall develop and implement an operation and maintenance program, to include the following:

- Definitive inspection and maintenance schedules for all co-permittee-owned structural controls which include the frequency of routine inspections. Actual inspections shall also be tracked.*
- Guidelines and criteria for maintenance activities that are to be implemented for co-permittee-owned structural controls, as well as a description of the maintenance activities required such as “disposal of sediment” and “removal of debris.”*
- A description of the inspection, operation, and maintenance of storm water retention facilities owned or operated by co-permittees.*

Floatables

Permit Condition Part II.A.2.a. Each co-permittee shall determine and utilize methods to reduce litter within their respective jurisdictions. There shall be methods in place to control litter on a daily basis, as well as control litter that may result from a major public event.

Permit Condition Part II.A.2.c. The co-permittees shall ensure that the streets for which they have maintenance authority and responsibility are swept as needed to reduce the discharge of pollutants to the MEP.

Pesticide, Herbicide, and Fertilizer Application

Permit Condition Part II.A.6.a. Application Management. Copermitees shall establish planting/landscape policies which encourage use of vegetation that is self sustainable without pesticides or fertilizers.

Permit Condition Part II.A.6.b. Distribution of Educational Materials. Copermitees shall distribute educational materials to all contracted applicators.

BMP 2: Operation and Maintenance

The City will continue to develop and implement a stormwater structural controls operation and maintenance program that includes the following:

- develop or update guidelines for stormwater facility maintenance and uses including proper disposal of sediment, removal of debris, and litter control (e.g., the O&M resource guide and Stormwater Ordinance)
- develop or update as needed operations and maintenance plans (O&M plans) for stormwater structural controls that are owned, operated by the City, including roads and flood control facilities³
- participate and cooperate with the Idaho Department of Agriculture (IDA) Integrated Pest Management (IPM) training and certification program to implement methods that reduce the use of pesticides, herbicides, and fertilizers applied by employees or contractors

STR BMP 2 Assessment Measures

- submit current guidance documents (e.g., O&M resource guide, O&M Plans, the City Parks and Recreation Chemical Pesticide Management Guidelines, and City facility spill response plans) and subsequent updates to the EPA with the first following annual report and make copies available to the public through the City Stormwater web pages and Boise City Hall
- submit updates to the inventories for City owned or operated properties as needed⁴
- implement the comprehensive planning and water quality management requirements as identified in the design manual⁵, including requirements

³All O&M plans are to be consistent with the City guidelines and criteria; identify inspection, operation, and maintenance schedules; and include activities to reduce litter and identify proper snow and ice removal practices for private and City owned roads. Proposed BMPs for roads address chemical and sand road applications for snow and ice control as well as methods for proper storage of de-icing materials, if used, to prevent un-used materials from entering storm drains.

⁴ Inventories and inspections for illicit connections were completed for all of the floodway conveyances operated by the City of Boise. These were submitted with the first year's annual report as required under the initial permit. Inventories and inspection for illicit connections were also completed and submitted at the same time for all other properties owed or operated by the City of Boise. An update to these inventories was conducted in preparation of this re-application in order to determine whether there were any additional receiving water bodies due to the additional annexations by the City of Boise since the Part 1 Application was submitted. This updated inventory demonstrates that there are no new receiving water bodies or additional receiving water body segments. Furthermore, the only properties owned or operated by the City of Boise that currently discharge to any receiving water body are: a short road segment located within Julia Davis Park, the parking areas of the Boise Library, Log Cabin, and Fire Department Training Station (Boise River); and, a small section of the federal Gowen Field National Guard Training Center leased from the Boise Airport.

⁵ Boise building permit design review, inspection procedures, and final occupancy permits require compliance with the requirements identified by the design manual through reference by the Boise Stormwater Ordinance.

to retro-fit existing flood control devices to provide additional pollutant removal

- number of City owned or operated stormwater facilities, including roads, inspected, operated, and maintained in a manner that is consistent with the O&M resource guide and Stormwater Ordinance, including the number of staff hours
- activity report on applications of pesticides, herbicides, and fertilizers on City owned and operated properties (i.e., overseen by IDA IPM certified staff)

Record Keeping

Permit Conditions Part II.A.1.c. Inspection and Maintenance Record Keeping. Each co-permittee that owns or operates structural controls shall maintain an internal record-keeping system to track inspections and maintenance for those portions of the MS4 operated by the co-permittee.

STR BMP 3: Record Keeping

The City will continue to maintain record keeping procedures to track the implementation of the design manual, O&M resource guide, O&M Plans, and the City Parks and Recreation Chemical Pesticide Management Guidelines.

STR BMP 3 Assessment Measures

- report on record keeping activities for the development and implementation of the City owned and operated stormwater structural controls O&M plans⁶ each year
- report on record keeping activities for the development and implementation of the Parks and Recreation Chemical Pesticide Management Guidelines each year

Proposed Changes for Second Permit Cycle

No changes are proposed at this time.

⁶ Proposed BMPs for record keeping on design manual and O&M plan compliance for structural controls not owned or operated by the City of Boise are addressed under “Areas of New Development and Re-Development.”

2. Areas of New Development and Redevelopment

DEV BMP 1: Design Manual

Permit Condition Part II.A.3.a. Each co-permittee shall develop and finalize a design manual incorporating BMPs or adopt for use the BMPs prepared by another approved sources.

Existing Program/Activity Description

The City will continue to ensure that the design manual and O&M resource guide are utilized and followed by developers, contractors and others involved in land development activities with the City's jurisdiction. Through the City building permit program, the City proposes to continue to require compliance with the design manual including prior to issuance of new permits for new development and redevelopment (including residential, commercial, and industrial land uses).

DEV BMP 1 Assessment Measure

- number of City permitted new and re-developments

DEV BMP 2: Compliance Review

Permit Condition Part II.A.3.b. Project review and approval procedures shall be developed that include the ability to conduct inspections and follow-up after construction to ensure that approved Operation and Maintenance plans are being followed.

Existing Program/Activity Description

City project compliance review and approval procedures will continue to be implemented to include inspections and follow-up after construction to ensure that approved drainage designs are installed and the O&M plans have been developed. The review and approval procedures are conducted prior to the City issuing the final new development and re-development occupancy permit.

DEV BMP 2 Assessment Measure

- number of City permitted new and re-developments inspected for design manual compliance and with an O&M plan

DEV BMP 3: Record Keeping

Permit Condition Part II.A.3.c. Co-permittees shall develop and maintain an internal record keeping system to track all activity on project review and approval actions.

Existing Program/Activity Description

The City utilizes an existing Planning and Development database (Permit/Plan) that was developed to track the status of building permit applications. The City will continue to maintain an internal record keeping system to track all activity on project review and approval actions.

DEV BMP 3 Assessment Measure

- report on permit plan review and building permit process record keeping activities

Proposed Changes for Second Permit Cycle

No changes are proposed at this time.

3. Roadways

Existing Program/Activity Description

Permit Condition Part II.A.4.a. Co-permittees shall develop a management practices program. This program shall include those management practices identified during the inventory of co-permittee-owned storm water facilities and audit of site activities undertaken as part of the application for the MS4 Permit. This program shall also evaluate ways to reduce pollutant discharges associated with road maintenance and rehabilitation operations.

Permit Condition Part II.A.4.b. C-permittees shall monitor the application of chemicals and sand applied to roadways for snow and ice control. Co-permittees shall implement programs for proper storage of de-icing materials to prevent materials from entering the storm sewer system, and research alternatives to salt for use in de-icing.

Existing Program/Activity Description

See "1. Structural Controls"

Proposed Changes for Second Permit Cycle

No changes are proposed at this time.

4. Flood Management

Permit Condition Part II.A.5.a. Co-permittees shall complete an inventory of all existing structural flood control devices within their jurisdictions to determine the feasibility of retrofitting them to provide additional pollutant removal.

Permit Condition Part II.A.5.b. Co-permittees shall develop procedures to assure that flood management projects assess the impacts on the water quality of the receiving water.

Existing Program/Activity Description

See “1. Structural Controls”

Proposed Changes for Second Permit Cycle

No changes are proposed at this time.

5. Illicit Discharges and Improper Disposal

Illicit Discharge

Permit Condition Part II.A.7. Each co-permittee shall implement an ongoing program to detect and remove illicit discharges and improper disposal into the MS4. Each co-permittee shall prevent un-permitted discharges of dry and wet weather overflows from sanitary sewers into the MS4. Each co-permittee shall limit the infiltration of seepage from sanitary sewers into the MS4.

Permit Condition Part II.A.7.a. Co-permittees shall work together to implement a program to inspect and enforce against illicit connections. The program shall include a requirement to update the inventory of all major outfalls within the jurisdictions of the co-permittees.

Permit Condition Part II.A.7.c. Co-permittees shall implement complaint investigation procedures to guide staff through recording, investigating and following up on complaints regarding violations reported by the general public.

Floatables

Permit Condition Part II.A.2.a. The co-permittees shall work with other authorities charged with enforcing litter control, and incorporate information on the existence of fines, penalties etc., for violations of such ordinances into any distribution of public education materials...

Public Education and Outreach

Permit Condition Part II.A.11.a.(5) Co-permittees shall document the complaints received from the general public regarding violations to the storm water ordinance, and the co-permittees' response to complaints.

Existing Program/Activity Description

The City proposes to continue to seek compliance with the Stormwater Ordinance and other local requirements to prevent illicit discharges and improper disposal through the following BMPs:

ILL BMP 1: Inspection

The City will continue to implement a program within its jurisdiction to:

- inspect and enforce against illicit discharges and connections
- use the results of industrial and commercial facility inspections and citizen reports to locate illicit discharges and connections
- ensure that an appropriate number of personnel receive training in the detection of illicit discharges and connections
- ensure compliance with the prohibition of illicit discharges and connections

ILL BMP 1 Assessment Measures

- number illicit discharges and connections identified within the City's jurisdiction eliminated or disconnected each year

ILL BMP 2: Compliance (Enforcement)

The City will continue to ensure compliance with the Boise Stormwater Ordinance within the City's jurisdiction, including the development of educational materials and outreach to operators of industrial and commercial activities that have a potential to spill liquid and solid wastes at their facilities. Furthermore, the City will continue to work cooperatively with the other Co-Permittees to prevent illicit discharges and improper disposal practices including stormwater complaint procedures.

ILL BMP 2 Assessment Measures

- number of identified non-compliant situations or activities with the Boise Stormwater Ordinance and brought into compliance within the City's jurisdiction each year
- submit current or updated stormwater complaint response guidance, entity referral matrix, and contact list to the EPA with the first following annual report

Proposed Changes for Second Permit Cycle

No changes are proposed at this time.

6. Spill Response and Prevention

Permit Condition Part II.A.8. Co-permittees shall implement a program to prevent, contain, and respond to spills that may discharge into the MS4. The spill response program may include a combination of spill response actions by the co-permittee (and/or another public or private entity), and legal requirements for private entities within the co-permittee's municipal jurisdiction.

a. Spill Response Task Group. Co-permittees shall participate in an interagency spill response task group, such as the Boise City Fire Department Task Group, to ensure that a coordinated response to spills is achieved and that impacts upon aquatic resources from spilled pollutants are controlled to the MEP. As part of this activity, co-permittees shall provide educational materials and outreach to operators of industrial and commercial activity that have a potential to spill liquid and solid wastes during transportation of such materials.

Existing Program/Activity Description

SPL BMP 1: Spill Response Task Group

The City will continue to participate in an interagency spill response task group, such as the Boise City Fire Hazardous Materials Team, to ensure that a coordinated response to spills is achieved and that impacts upon aquatic resources from spilled pollutants are controlled to the MEP.

SPL BMP 1 Assessment Measure

- activity report of Ada County Local Emergency Planning Committee meetings attended by City staff each year

Proposed Changes for Second Permit Cycle

No changes are proposed at this time.

7. Industrial and High Risk Runoff

Permit Condition Part II.A.9. Co-permittees shall implement a program to identify, monitor, and control pollutants in storm water discharges to the MS4 from municipal landfills; hazardous waste treatment, storage, disposal and recovery facilities and facilities that are subject to Section 313 of the Emergency Planning and Community Right to Know Act (EPCRA, 42 U.S.C. §11023); and any other industrial or commercial discharge the co-permittee determines is contributing a substantial pollutant loading to the MS4.

Existing Program/Activity Description

IND BMP 1: Industrial and High Risk Program Participation

The City will continue to provide services to ACHD as identified in Intergovernmental MOUs to participate in the implementation of the industrial and high risk inspection program. City participation may include meeting attendance and the following services: creation or maintenance of a database of facilities; inspection and monitoring of high risk facilities within the City's jurisdiction; and/or, developing and distributing educational materials during ACHD sponsored inspections.

IND BMP 1: Assessment Measures

- submit current or future industrial stormwater inspection MOUs to the EPA with the first following annual report

Proposed Changes for Second Permit Cycle

No changes are proposed at this time.

8. Construction Site Runoff

Permit Condition Part II.A.10.a. Co-permittees shall implement a Construction Site Discharge Control Program 18 months from the effective date of the permit.

Permit Condition Part II.A.10.b. Co-permittees shall conduct inspection of construction sites to ensure compliance with the measures outlined in II.A.10(a).

Permit Condition Part II.A.10.c. Co-permittees shall develop and maintain a database of all active and completed construction sites permitted within their jurisdiction and completed during the term of this permit.

Existing Program/Activity Description

The City proposed to continue to implement a program to reduce to the MEP the discharge of pollutants from constructions sites including:

- requirements for the use and maintenance of appropriate structural and nonstructural BMPs to reduce pollutants discharged to the MS4 during the time construction is underway
- procedures for site planning which incorporate considerations for potential short and long term water quality impacts and which minimize these impacts
- prioritized inspection and frequency of construction sites and enforcement of control measures
- appropriate education and training measures for construction site operators

CON BMP 1: Construction Site Erosion and Sediment Control and Training

The City proposes to continue to implement training certification and require owners or operators of the development site to prepare, and submit for approval, Erosion and Sediment Control (ESC) plans for construction within the City's jurisdiction. Training certification will continue to be required for ESC "plan designers" and construction site "responsible persons."

Existing procedures for site plan review that incorporate consideration of potential water quality impacts from construction sites will continue to be implemented. City approved ESC plans will continue to require BMPs and will contain provisions addressing material containment, spill prevention, and other practices as applicable.

Construction Site Discharge Control permit requirements were codified by Boise City Ordinance 8-17 on November 14, 2001. The Ordinance recognizes three general classes of development with different characteristics:

- flatland development
- development in the foothills, commercial development and multi-unit developments
- developments in environmentally sensitive areas

Individual permits are issued after the submittal and approval of site specific erosion and sediment control (ESC) plans for sites located in environmentally sensitive areas, for developments in the foothills and for multiple home developments, apartment complexes, commercial sites and commercial demolition. General permits are issued for single-family homes and duplexes site development, construction, and/or demolition. A general permit does not require the submittal of a site-specific ESC plan.

CON BMP 1: Assessment Measures

- submit current City Construction Site Erosion and Sediment Control guidance documents and requirements, including subsequent updates, to the EPA with the first following annual report (note: copies of these documents will also be available to the public through the City Construction Site Runoff program web pages and City Hall)
- number of ESC plans reviewed and City building permits issued through the Construction Site Discharge Control Program
- number of participants and trainings held each year for construction site ESC “plan designer” and “responsible person” certification

CON BMP 2: Inspection, and Compliance

Within the City’s jurisdiction all public and private construction sites are subject to inspection for compliance with their erosion and sediment control plan and and/or permit conditions. Inspections may be required after installation of structural controls or may consist of random inspections or complaint driven requests. Construction site compliance is accomplished during the inspection process. To address situations of non-compliance correction notices, notices of violation, stop work orders, or other enforcement mechanisms may be issued. The primary method of achieving compliance has been the use of education, correction notices, and stop-work orders, in that order.

Public complaints about construction site activities are received by City staff through direct calls from the public and through calls referred by the Mayor’s office, Code Enforcement, and other agencies. Most of the complaints currently received by City staff come from citizens, other contractors, or developers. The City will continue to conduct inspections of construction sites within the City’s jurisdiction to ensure compliance with the measures outlined in the initial permit.

The City will continue to undertake enforcement measures against those operators of sites in violation of the measures located within the City's jurisdiction, including the issuance of notices of violation and stop work orders.

CON BMP 2: Assessment Measures

- number and percentage of active construction sites inspected within the City's jurisdiction during each year
- number and percentage of non-compliant construction site situations or activities brought into compliance each year

CON BMP 3: Database and Record Keeping

The City utilizes an existing Planning and Development database (Permit/Plan) that was developed to track the status of building permit applications. The status of each permit is traced from submittal of the application through the review process, field inspections, and enforcement activities by field inspectors and issuance of a Certificate of Occupancy. Reports of these activities can be accessed at any time.

The City proposes to continue to maintain the existing database of all active and completed construction sites permitted within their jurisdiction and completed during the term of this permit. The database will continue to contain basic information regarding the nature of the construction activity, size of land clearing and grading activities, and contact information on the contractor and/or developer.

CON BMP 3: Assessment Measure

- report on Permit/Plan review and building permit process record keeping activities

Proposed Changes for Second Permit Cycle

Part II.A.10.a. of the original permit states that program activities "extend to all construction activity within the municipality and all construction sites, regardless of size or ownership." The City proposes that this requirement be clarified to state "Co-Permittees shall implement a construction site runoff program within each respective jurisdiction to reduce, to the MEP, the discharge of pollutants from public and private construction sites."

Rationale: The City does not have authority over other jurisdictions or their construction activities within city boundaries including projects under the jurisdiction of Ada County, Ada County drainage districts, the State of Idaho, the federal government, or the Ada County Highway District.

9. Public Education (individual)

Pesticide, Herbicide, and Fertilizer Application

Permit Condition Part II.A.6.a. Permit Condition A.6.b. Distribution of Educational Materials. Copermittees shall distribute educational materials to all contracted applicators.

Construction Site Runoff

Permit Condition Part II.A.10.d. Annual Report. Each annual report beginning with the second, shall include the following: ...the type and number of educational materials distributed by co-permittees; the outreach events that representatives of co-permittees attended in order to disseminate information regarding the purpose of the program;...

Illicit Discharge and Improper Disposal

Permit Condition Part II.A.7.a. ...Each co-permittee shall provide education activities, public information activities, and other appropriate activities to facilitate the proper management and disposal of used oil and toxic materials (including antifreeze, paint, solvents, pesticides, and herbicides). Appropriate programs include the collection of used motor oil at curbside residences and the collection of hazardous waste at central locations. If conducted, these programs should be publicized on a regular basis...

Existing Program/Activity Description

PED BMP 1: Pesticide, Herbicide, and Fertilizer Education and Outreach to Contract Applicators

The City will continue to take advantage of the IPM training conducted locally by the Idaho Department of Agriculture. This training, usually held each spring, provides certification and recertification training for local applicators, including City and non-City staff.

PED BMP 1: Assessment Measure

Activity report on contract applications on City owned and operated areas.

PED BMP 2: Construction Runoff Education and Outreach

Education and outreach activities that will be continued during the second permit term include the following:

- City formal education and certification program required by Ordinance 8-17, consisting of the 4-hour Plan Designer Class and the 4-hour Responsible Person Training Class, and the recertification training
- program web page located on the City of Boise web site
- program brochure

The Planning and Development Services newsletter, “Hammer and Nail News” is also used to disseminate information about the Program and federal NPDES permit requirements. Initiatives such as outreach and educational activities for construction site planners, developers, builders, and operators will continue to be included in the implementation of the program.

PED BMP 2: Assessment Measure

- activity report on construction site runoff education and outreach

PED BMP 3: Illicit Discharge and Improper Disposal Education and Outreach

The City will continue to distribute information and conduct outreach to seek compliance with the Boise Stormwater Management and Discharge Control (BCC 8-15) and Boise Construction Erosion and Sediment Control (BCC 8-17).

PED BMP 1: Assessment Measure

- activity report on illicit discharge and improper disposal education and outreach including the number of Boise Non-Stormwater Disposal Handbooks distributed to industrial and commercial facilities each year

Proposed Changes for Second Permit Cycle

No changes are proposed at this time.

Boise State University

Introduction

Boise State is Idaho's metropolitan university located next to the south bank of the Boise River, near the center of downtown Boise. The main campus consists of more than 60 buildings on a 153-acre main campus. Boise State currently has seven storm water outfalls to the Boise River that drain impervious surfaces on campus such as parking lots and rooftops.

1. Structural Controls

Design Manual

Permit Condition A.1.a. Co-permittees shall adopt design manuals that incorporate Best Management Practices (BMPs) and operation and maintenance criteria for all existing and future structural controls under the jurisdiction of the co-permittees. This requirement may be satisfied by adopting by reference all or elements of the design manuals and guidebooks developed by other co-permittees, including the January 1997 Boise Storm Water Best Management Practices Guidebook, the July 1994 ITD Catalog of Storm Water Best Management practices, the June 1999 City of Boise Storm Water Management Design Manual, and the December 1999 ACHD Development Policy Manual.

Existing Program/Activity Description

Boise State operates and maintains the MS4 on the University property. Boise State University has adopted the *Catalog of Storm Water Best Management Practices for Idaho Cities and Counties*, including any subsequent updates, prepared by the Idaho Department of Environmental Quality (IDEQ). This manual shall be used by all design consultants, contractors, and others involved in land development and construction activities on Boise State University facilities, for stormwater Best Management Practices (BMP) and operation and maintenance criteria, for all existing and future stormwater structural controls. Contractors and others will not be limited to the *Catalog of Storm Water Best Management Practices for Idaho Cities and Counties* for development and subsequent acceptance of suitable BMPs and operation and maintenance criteria for existing and future stormwater structural controls.

Proposed Changes for Second Permit Cycle

The copermitees, in conjunction with the Idaho Department of Environmental Quality, plan to revise and update the BMP Manual. The revised document is anticipated to be completed during FY 2005.

No permit changes are proposed.

Operation and Maintenance Program

Permit Condition A.1.b. Copermitees shall develop and implement an operation and maintenance program.

Existing Program/Activity Description

Boise State has an Operation and Maintenance plan that states criteria for inspection and maintenance activities. Approximately 33 to 50 percent of the stormwater structures are inspected annually and approximately 33 percent of the structures are cleaned annually. Floatables are picked up daily as needed.

Proposed Changes for Second Permit Cycle

No permit changes are proposed.

Inspection and Maintenance Record Keeping

Permit Condition A.1.c. Each copermitee that owns or operates structural controls shall maintain an internal record-keeping system to track inspections and maintenance for those portions of the MS4 operated by the copermitee.

Existing Program/Activity Description

Boise State University utilizes Facilities Operations & Maintenance Department's (FO&M) work-order system to schedule and record all inspections and maintenance activity with regard to the structural controls of its storm water drainage system.

The work-order system will automatically issue a maintenance work-order on specified dates detailing what work is to be done. All labor and materials needed to complete the work will be recorded by the responsible department and turned in to the work-order control desk. The work-order control desk will enter the information into the work-order database for documentation.

Proposed Changes for Second Permit Cycle

No permit changes are proposed.

Floatables

Permit Condition A.2 The copermittees shall ensure the establishment of a program to reduce the discharge of floatables.

Existing Program/Activity Description

Boise State University Landscape Services has a crew that removes floatables for approximately two hours every weekday morning. Floatables are addressed by clean up crews for events held on weekends on the campus.

Boise State will continue to participate in cooperative efforts with other copermittees and agencies with regard to floatable clean up events.

Proposed Changes for Second Permit Cycle

Boise State University is currently in the process of a stormwater improvement project that will add an "AquaSwirl" treatment to the terminal end of one of the larger drainages on the campus. The "AquaSwirl" will have a baffle system to separate and collect floatables prior to stormwater discharge to the Boise River.

No permit changes are proposed.

2. Roadways

Permit Condition A.4.a. Co-permittees shall develop a management practices program. This program shall include those management practices identified during the inventory of co-permittee-owned storm water facilities and audit of site activities undertaken as part of the application for the MS4 Permit. This program shall also evaluate ways to reduce pollutant discharges associated with road maintenance and rehabilitation operations.

Permit Condition A.4.b. C-permittees shall monitor the application of chemicals and sand applied to roadways for snow and ice control. Co-permittees shall implement programs for proper storage of de-icing materials to prevent materials from entering the storm sewer system, and research alternatives to salt for use in de-icing.

Program/Activity Description

Boise State evaluated ways to reduce pollutants from roadway maintenance activities. Boise State monitors application of chemicals and sand for ice and traction control. A balance between safety and application of chemicals and sand for ice and traction control is sought. Boise State practices proper sand/deicer storage.

Proposed Changes for Second Permit Cycle

Boise State will perform an audit of ice and traction control activities. Boise State will continue to evaluate ways to reduce pollutants from roadway maintenance activities.

No permit changes are proposed.

3. Flood Management

Permit Condition A.5.a Inventory of Structural Flood Control Devices. Complete an inventory of all structural flood control devices within their jurisdiction to determine the feasibility of retrofitting such devices to provide additional pollutant removal.

Permit Condition A.5.b Copermittees shall ensure that any flood management projects it undertakes include an assessment of the impacts on receiving water quality.

Program/Activity Description

A.5.a. - Boise State has an inventory of structural control devices for stormwater. Boise State University is currently in the process of a stormwater improvement project that will add an "AquaSwirl" treatment to the terminal end of one of the larger drainages on the campus. The "AquaSwirl" will remove sediments from stormwater via vortex action. Another smaller drainage has also been redirected to the "AquaSwirl". Boise State anticipates other improvement projects which may or may not occur within the next permit period.

Proposed Changes for Second Permit Cycle

No permit changes are proposed.

Program/Activity Description

A.5.b. - Boise State has no flood management projects.

Proposed Changes for Second Permit Cycle

Boise State should not be subject to this permit condition because Boise State has no flood management authority or flood management projects.

4. Illicit Discharges and Improper Disposal

Permit Condition A.7 Copermittees shall implement an ongoing program to detect and remove illicit discharges and improper disposal into the MS4.

Program/Activity Description

Boise State performs dry-weather screening of outfalls annually. Citizen reports are responded to by the Stormwater Coordinator who requires illicit discharges or improper disposal to cease immediately. The Stormwater Coordinator records incidents and investigations on the Stormwater Incident Report form which is kept as a hard copy and electronic copy.

Proposed Changes for Second Permit Cycle

No permit changes are proposed.

5. Spill Response and Prevention

Permit Condition A.8 Copermittees shall implement a program to prevent, contain, and respond to spills that may discharge into the MS4.

Program/Activity Description

Boise State participates in the Spill Response Task Group. Boise State is listed on the Complaint Response Matrix and Contact List. The document was updated by Boise City in September 2003 and distributed to the Campus Security Dispatch Center. Boise State is in the process of developing a Spill Prevention Control and Countermeasure (SPCC) plan for University facilities. Boise State staff participates in and is a member of the Local Emergency Planning Committee (LEPC).

Proposed Changes for Second Permit Cycle

Complete and implement the SPCC plan.

No permit changes are proposed.

6. Construction Site Runoff

Permit Condition A.10 Copermittees shall develop and implement a program to reduce to the MEP the discharge of pollutants from construction sites.

Program/Activity Description

Boise State has adopted construction site discharge control program language which is in Project Manuals for construction projects on campus. The Idaho Department of Administration, Division of Public Works (DPW) has also adopted the language for projects under their control on the University campus. DPW performs or acts as the general contractor on the large projects on campus.

The construction site discharge control program language requires contractors and others involved in land development and construction activities on Boise State University facilities, to prepare and submit to Boise State University or its designated agent for review and approval, an Erosion and Sediment Control (ESC) plan for a construction site on Boise State University facilities. Contractors and/or operators of construction sites on Boise State University facilities shall use and maintain the approved BMPs and erosion and sediment controls specified in the ECS plan to reduce pollutants to the maximum extent possible.

Boise State University or its designated agent has the authority to inspect the construction site(s) and to issue notices of violation and stop work orders for violations or lack of compliance with the ECS plan.

Proposed Changes for Second Permit Cycle

Develop a spreadsheet for tracking plan reviews and inspections of construction site activities.

No permit changes are proposed.

7. Public Education

Permit Condition A.11 Copermittees shall implement a public education plan.

Program/Activity Description

Boise State University participates in the Public Education Program by participating in the Intergovernmental Agreement and cost sharing with the City of Boise, the agency responsible for the Public Education aspect. The Boise State Stormwater Coordinator is a member of the copermittee Public Education Committee. The Boise State University storm water coordinator participates in educational activities with the other Co-permittees.

Proposed Changes for Second Permit Cycle

No permit changes are proposed.

Ada County Drainage District 3

Introduction

Within the NPDES permit area, Ada County Drainage District #3 (DD3) owns and operates drainage channels and drain pipes in the southeast section of town. Southeast Boise entails an older, fully developed area in and around BSU and a rapidly growing area that is emphasized for development under Boise City's Comprehensive Plan. DD3 receives drainage from storm drains under the control of ACHD, irrigation run-off from irrigated land and irrigation canals, and drainage from residential and commercial development (previously irrigated land) which discharge directly into DD3's facilities.

1. Structural Controls

Design Manual

Permit Condition A.1.a. Co-permittees shall adopt design manuals that incorporate Best Management Practices (BMPs) and operation and maintenance criteria for all existing and future structural controls under the jurisdiction of the co-permittees. This requirement may be satisfied by adopting by reference all or elements of the design manuals and guidebooks developed by other co-permittees, including the January 1997 Boise Storm Water Best Management Practices Guidebook, the July 1994 ITD Catalog of Storm Water Best Management practices, the June 1999 City of Boise Storm Water Management Design Manual, and the December 1999 ACHD Development Policy Manual.

Program/Activity Description

The primary activity with regard to the District's system is ongoing operation and maintenance. Occasional new development typically results in the covering of open ditches, in the case of commercial development; and maintenance of the open ditches as an amenity by homeowners, in the case of residential development. Standards for ditch modification, usually rerouting and covering are proposed by the developer's engineer or another public entity such as ACHD, and reviewed and approved by the District's engineering consultant. No system expansion is anticipated and the extent of system modification is limited. The District has adopted the standards contained in the Boise City Storm Water Design Standards Manual and the ACHD Policy Manual (currently under revision). These documents provide standards relating to structural activities anticipated by the District.

Proposed Changes for Second Permit Cycle

The copermitees, in conjunction with the Idaho Department of Environmental Quality, plan to revise and update the BMP Manual. The revised document is anticipated to be completed during FY 2005.

Operation and Maintenance

Permit Condition A.1.b. Operation and Maintenance Program. Copermitees shall develop and implement an operation and maintenance program, to include the following:

- Definitive inspection and maintenance schedules for all co-permittee-owned structural controls which include the frequency of routine inspections. Actual inspections shall also be tracked.*
- Guidelines and criteria for maintenance activities that are to be implemented for co-permittee-owned structural controls, as well as a description of the maintenance activities required such as "disposal of sediment" and "removal of debris."*
- A description of the inspection, operation, and maintenance of storm water retention facilities owned or operated by copermitees.*

Program/Activity Description

Written guidelines and criteria for maintenance activities have been developed and are included in the District's Operation and Maintenance Manual. During the course of a typical year, the District inspects its facilities approximately three times a week during the irrigation season and about once a month in the off-season. The inspection focuses, primarily, on the open ditch facilities. The underground facilities do not require the same type of inspection, absent some kind of complaint or other reason. The underground facilities can be inspected at the manhole areas, by lifting the cover and visually inspecting the junction box. A detailed inspection would require some type of camera technique.

No comprehensive inventory of manholes, trash grates or grease traps exist at the present time. For those facilities that relate to private development, the homeowners group, or property owner in the case of a commercial development, are contractually bound to maintain the facility.

Maintenance is performed when the need has been identified during an inspection or when the District is notified of a problem. Inspections and maintenance

activities are also conducted at the beginning of the irrigation season following major storm events and shortly after the irrigation season. Maintenance typically consists of the removal of sediment and debris from the system to prevent obstructions. Litter is picked up as needed to keep open ditches clear of debris. As far as cleaning of the open ditches, the process is done through manual labor, with vegetation remaining primarily on the ditch bank. Where trash grates are located and trash receptacles are available, the District personnel attempt to dispose of the material accordingly.

From a qualitative standpoint, though subjective in assessment, the condition of the facilities and the “illicit” discharge of material appear to have improved. The primary material found in the open ditch is leaf material in the fall. Grass clippings have become less of a problem. The District’s one detention facility is, again, primarily the responsibility of a commercial developer. However, no major problem has been experienced with this facility.

Two or three signs are visible throughout the system that provides the message of the unlawful nature of discharging or dumping into the ditch.

Proposed Changes for Second Permit Cycle

Schedules, guidelines and criteria have been developed. The existing operation and maintenance activities will be continued.

Record Keeping

Permit Conditions A.1.c. Inspection and Maintenance Record Keeping. Each co-permittee that owns or operates structural controls shall maintain an internal record-keeping system to track inspections and maintenance for those portions of the MS4 operated by the co-permittee.

Program/Activity Description

These activities are currently documented as part of the activity and time sheet prepared by the District Supervisor. An annual summary is prepared from this information for inclusion in the annual report to EPA.

Proposed Changes for Second Permit Cycle

Inspection and maintenance record keeping will be continued.

2. Areas of New Development and Redevelopment

Permit Condition A.3.a. Each co-permittee shall develop and finalize a design manual incorporating BMPs or adopt for use the BMPs prepared by another approved sources.

Permit Condition A.3.b. Project review and approval procedures shall be developed that include the ability to conduct inspections and follow-up after construction to ensure that approved Operation and Maintenance plans are being followed.

Permit Condition A.3.c. Co-permittees shall develop and maintain an internal record keeping system to track all activity on project review and approval actions.

Program/Activity Description

Much of the land within the District's boundaries has been developed. Redevelopment that may occur in the future within the District's service area will likely be limited commercial development and residential infill in the older neighborhoods.

New development and redevelopment is subject to review and permitting by Boise City when the proposed land use is commercial, industrial, or residential infill. The District reviews plans and issues permits for residential subdivisions that contain public roads. Boise City will not permit offsite discharge without the review and approval of the District, when the District's system will be affected. The District must provide written permission before permitting will occur. Boise City water quality requirements, Operation and Maintenance Plan requirements, and ongoing maintenance requirements must also be met. The District relies on Boise City to obtain information and enforce plan approval.

The District also reviews proposed development and redevelopment that will impact its system and enters into agreements with the developers, landowners, or homeowner associations. These drainage plans and any agreements are currently kept on file by the District's legal counsel. Agreements are also recorded.

Proposed Changes for Second Permit Cycle

The existing procedures and policies for new development and redevelopment are adequate to comply with this permit condition and will be continued as needed.

3. Flood Management

Permit Condition A.5.a. Co-permittees shall complete an inventory of all existing structural flood control devices within their jurisdictions to determine the feasibility of retrofitting them to provide additional pollutant removal.

Permit Condition A.5.b. Co-permittees shall develop procedures to assure that flood management projects assess the impacts on the water quality of the receiving water.

Program/Activity Description

The NPDES Permit defines “structural flood control device” to mean a device which has been designed and installed for the purpose of storm drainage during storm events. The District system was designed and built to convey ground water drainage, limited agricultural-related drainage, and storm water over primarily irrigated lands.

Conveyance facilities were designed and sized to carry limited drainage and runoff from average storm events, recognizing its primary irrigation drainage objective. None of the District’s facilities are operated as flood control facilities.

Proposed Changes for Second Permit Cycle

The District should not be subject to this permit condition during the next permit cycle because it does not apply to the District’s system.

4. Illicit Discharges and Improper Disposal

Permit Condition A.7. Each co-permittee shall implement an ongoing program to detect and remove illicit discharges and improper disposal into the MS4. Each co-permittee shall prevent un-permitted discharges of dry and wet weather overflows from sanitary sewers into the MS4. Each co-permittee shall limit the infiltration of seepage from sanitary sewers into the MS4.

Permit Condition A.7.a. Co-permittees shall work together to implement a program to inspect and enforce against illicit connections. The program shall include a requirement to update the inventory of all major outfalls within the jurisdictions of the co-permittees.

Permit Condition A.7.c. Co-permittees shall implement complaint investigation procedures to guide staff through recording, investigating and following up on complaints regarding violations reported by the general public.

Program/Activity Description

A complete visual survey of the system occurs annually when pre-irrigation season maintenance occurs. An inventory and inspection of District outfalls occurs on an annual basis, as part of regular inspection activities.

The number of complaint calls received regarding the District system is small and relate primarily to problems with the system, such as obstructions, rather than water quality problems. The District Supervisor responds to these calls when they occur and action is taken to remedy the situation.

The District coordinates with the co-permittees in the process for receiving and responding to citizen complaints. The District has documented procedures that are included in the Operation and Maintenance Manual. A summary of the complaint response activities is provided to ACHD annually for inclusion in the annual report to EPA.

Proposed Changes for Second Permit Cycle

The District will continue to implement this program requirement.

5. Spill Response and Prevention

Permit Condition A.8.a. Co-permittees shall participate in an interagency spill response task group to ensure that a coordinated response to spills is achieved and that impacts upon aquatic resources from spilled pollutants are controlled to the MEP.

Program/Activity Description

Based on conversations with the District Supervisor and an evaluation of the system, the risk of spills impacting the District's system is low. There do not appear to be any documented cases of this occurring in the recent past. The District and other co-permittees address this requirement of the permit by relying on other copermitees who participate in the monthly coordination meetings of the interagency spill response task group.

Proposed Changes for Second Permit Cycle

Continue implementation by reliance on other copermitees.

Garden City

Introduction

This storm water management plan has been developed to comply with the National Pollutant Discharge Elimination System (NPDES) Permit (#IDS-02756-1) issued on November 29th, 2000, the reapplication requirements described in Federal Register Vol. 61, No 155, pp. 41698-41699 and the applicable Total Maximum Daily Load requirements, as described in 40 CFR 130.7.

Pursuant to the requirement to identify storm water systems located on public lands within its city limits refer to the vicinity map of the co-permittee jurisdictions (Attachment A) and the Garden City structural control inventory of City owned systems.

1. Structural Controls

Design Manual

Permit Condition A.1.a. Co-permittees shall adopt design manuals that incorporate Best Management Practices (BMPs) and operation and maintenance criteria for all existing and future structural controls under the jurisdiction of the co-permittees. This requirement may be satisfied by adopting by reference all or elements of the design manuals and guidebooks developed by other co-permittees, including the January 1997 Boise Storm Water Best Management Practices Guidebook, the July 1994 ITD Catalog of Storm Water Best Management practices, the June 1999 City of Boise Storm Water Management Design Manual, and the December 1999 ACHD Development Policy Manual.

Existing Program/Activity Description

Garden City has adopted the Boise City's *Storm Water Management, A Design Manual*, through the revised Garden City Storm Water Management & Discharge Control Ordinance Title 4, Chapter 14. The design manual requirements have been implemented within the city municipal maintenance program.

Proposed Changes for Second Permit Cycle

No recommended changes.

Operation and Maintenance

Permit Condition A.1.b. Operation and Maintenance Program. Co-permittees shall develop and implement an operation and maintenance program, to include the following:

- Definitive inspection and maintenance schedules for all co-permittee-owned structural controls which include the frequency of routine inspections. Actual inspections shall also be tracked.*
- Guidelines and criteria for maintenance activities that are to be implemented for co-permittee-owned structural controls, as well as a description of the maintenance activities required such as “disposal of sediment” and “removal of debris.”*
- A description of the inspection, operation, and maintenance of storm water retention facilities owned or operated by co-permittees.*

Existing Program/Activity Description

Structural controls are currently being inspected & maintained as described in the Garden City O&M Plan. Each Garden City facility with paved parking or roads, is swept regularly as debris and leaves accumulate. Additionally, garbage cans are posted and emptied regularly in all public areas. Staff conduct the daily litter control by manual sweeping efforts as well.

Proposed Changes for Second Permit Cycle

The copermittees, in conjunction with the IDEQ, plan to revise and update the BMP Manual. The revised document is anticipated to be completed during FY 2005.

Record Keeping

Permit Conditions A.1.c. Inspection and Maintenance Record Keeping. Each co-permittee that owns or operates structural controls shall maintain an internal record-keeping system to track inspections and maintenance for those portions of the MS4 operated by the co-permittee.

Existing Program/Activity Description

Current record keeping procedures are conducted by each Garden City department charged with maintenance of the property using the guidance set forth in the City's O&M Plan. As each activity is undertaken, an Inspection Cover Sheet form and/or a Maintenance form is completed by responsible staff. All completed inspection, maintenance, and annual log forms are located in the Structure Control Maintenance log book as described within the O & M Plan.

Proposed Changes for Second Permit Cycle

No recommended changes.

Floatables

Permit Condition A.2.b. The co-permittees shall implement a program or programs, such as the Adopt-a-Highway program, to facilitate litter removal from selected highways two times a year or as needed.

Permit Condition A.2.c. The co-permittees shall ensure that the streets for which they have maintenance authority and responsibility are swept as needed to reduce the discharge of pollutants to the MEP. Co-permittees shall compile a report on the sweeping activity and shall assess the above levels of effort in each of the designated land use type areas with respect to the mitigation of contribution of pollutants from the highways and other public areas that are maintained.

Existing Program/Activity Description

Litter control and recycling are critical elements incorporated into the Boise MS4 permit storm water public education. Specific Educational materials and activities for Garden City have been developed as follows:

- Garden City Storm Water Ordinance
- Storm Drain Stenciling Outreach program
- Household Hazardous Waste Collection Bookmarks

- Newspaper publications and announcements
- Boise River Clean Up Event

Adopt a Highway program has been implemented by Idaho Transportation Department, the owner and operator of highways located in Garden City. Garden City staff conduct routine litter pick-up daily on all Garden City-owned and operated facilities. Each Garden City facility with either a street or parking lot is swept regularly as debris and leaves accumulate. Additionally, garbage cans are posted and emptied regularly in all public areas.

Garden City Household Hazardous Waste Collection Facility supports the spirit of floatable controls.

Proposed Changes for Second Permit Cycle

No recommended changes.

2. Areas of New Development and Redevelopment

Permit Condition A.3.a. Each co-permittee shall develop and finalize a design manual incorporating BMPs or adopt for use the BMPs prepared by another approved source.

Permit Condition A.3.b. Project review and approval procedures shall be developed that include the ability to conduct inspections and follow-up after construction to ensure that approved Operation and Maintenance plans are being followed.

Permit Condition A.3.c. Co-permittees shall develop and maintain an internal record keeping system to track all activity on project review and approval actions.

Existing Program/Activity Description

Garden City has revised Garden City Storm Water Management and Discharge Control Ordinance to meet the design standard requirements, by reference to the Boise City Design Manual for guidance in practices for design of drainage facilities, Title 4, Chapter 14, Section 6. The Garden City Storm Water Management and Discharge Control Ordinance requires compliance with New Development and Redevelopment standards set by the city, Title 4, Chapter 14, Section 14.

The Design Manual requires operation and maintenance plans to be developed in accordance with Boise City Design Manual and the Garden City Storm Water Operation and Maintenance Guidance Document.

All new planning/zoning & building permits issued by Garden City are reviewed for compliance with the design standards adopted by reference in the Garden City STW Ordinance Title 4, Chapter 14. The permit application is reviewed for compliance with the design standard requirements prior to issuance of the permit. This information is tracked in the permitting database.

All plans submitted with both Planning and Zoning or Building permit applications shall be reviewed and approved based upon the review & approval procedures using the plan review checklist forms prior to being issued a permit.

Each building permit holder receives an inspection card which is used to track each inspection and any actions taken. This card is kept on the site at all times by the permit holder. An Occupancy Request Form is used to track inspections and the final inspection approvals for each department. No occupancy permits are

issued without this form being signed by each designee for final inspection approvals.

Inspections for approved project operation and maintenance for storm drain systems shall be conducted on a routine basis. These inspections shall verify compliance with the O & M Plan submitted.

Proposed Changes for Second Permit Cycle

The copermittees, in conjunction with the IDEQ, plan to revise and update the BMP Manual. The revised document is anticipated to be completed during FY 2005.

3. Roadways

Permit Condition A.4.a. Co-permittees shall develop a management practices program. This program shall include those management practices identified during the inventory of co-permittee-owned storm water facilities and audit of site activities undertaken as part of the application for the MS4 Permit. This program shall also evaluate ways to reduce pollutant discharges associated with road maintenance and rehabilitation operations.

Permit Condition A.4.b. C-permittees shall monitor the application of chemicals and sand applied to roadways for snow and ice control. Co-permittees shall implement programs for proper storage of de-icing materials to prevent materials from entering the storm sewer system, and research alternatives to salt for use in de-icing.

Existing Program/Activity Description

Garden City does not own or maintain any roadways. For City owned paved parking areas and sidewalks; alternatives to sodium chloride based de-icers have been purchased and are utilized at many facilities. All chemicals and equipment involved in snow and ice removal are stored in covered and locked locations

Proposed Changes for Second Permit Cycle

Not applicable to the Garden City system.

4. Flood Management

Permit Condition A.5.a. Co-permittees shall complete an inventory of all existing structural flood control devices within their jurisdictions to determine the feasibility of retrofitting them to provide additional pollutant removal.

Permit Condition A.5.b. Co-permittees shall develop procedures to assure that flood management projects assess the impacts on the water quality of the receiving water.

Existing Program/Activity Description

All inventory for Garden City flood control devices are listed under the Structure Control Program. This inventory and O&M plans are to be updated as additional facilities have been identified, acquired or built. All flood management projects, from maintenance to expansions, conducted by Garden City are to comply with the Garden City STW Ordinance and the Garden City O & M Plan requirements.

Proposed Changes for Second Permit Cycle

No recommended changes.

5. Illicit Discharges and Improper Disposal

Permit Condition A.7. Each co-permittee shall implement an ongoing program to detect and remove illicit discharges and improper disposal into the MS4. Each co-permittee shall prevent un-permitted discharges of dry and wet weather overflows from sanitary sewers into the MS4. Each co-permittee shall limit the infiltration of seepage from sanitary sewers into the MS4.

Permit Condition A.7.a. Co-permittees shall work together to implement a program to inspect and enforce against illicit connections. The program shall include a requirement to update the inventory of all major outfalls within the jurisdictions of the co-permittees.

Permit Condition A.7.c. Co-permittees shall implement complaint investigation procedures to guide staff through recording, investigating and following up on complaints regarding violations reported by the general public.

Existing Program/Activity Description

The Garden City Environmental Department receives notification of potential STW Ordinance violations, conducts investigations, distributes storm water information, and tracks compliance activities. All inspection & enforcement for the STW Ordinance is conducted in accordance with the Garden City Storm Water Investigation Manual and the ACHD Storm Water Investigation Manual. Garden City Legal Department staff shall assist in conducting the prosecution of such violations of the STW Ordinance.

Garden City staff shall be provided training for identification of potential illicit discharge activities, reporting procedures. Investigations by Environmental staff are conducted when an incident is a possible violation of the STW Ordinance or permit and occurs within the Garden City Jurisdiction.

Inspection of the high risk and industrial facilities are conducted by Garden City. Enforcement of Title 4, Chapter 14, "The Garden City Storm Water Management and Discharge Control Ordinance", using the investigation manual for receiving and tracking illicit discharge situations within a reasonable time.

A database application is used to assist staff in tracking illicit discharge activities. Information is collected and recorded on an Illicit Discharge Storm Water Response Field Form.

The City and co-permittees work together to identify and conduct investigations for possible illicit discharges to the MS4 through an interagency agreement. The Garden City Storm Water Ordinance addresses police powers of Environmental staff to assist all agencies for enforcement within the city jurisdiction. Notification of a situation may occur through inspections of facilities, referral from another agency or the Storm Water Pollution Hotline.

Environmental staff conducts an investigation by locating the responsible party, if unknown, contact is made with the individual who submitted the original notification. It is procedure for Environmental staff to provide information, on site, regarding the STW Ordinance, and appropriate methods of disposal with contact information for possible future issues or questions. Each investigation is recorded and conducted using the Illicit Discharge Storm Water Investigation Form. This form is used for response activity tracking, and legal documentation for illicit discharges.

Prompt response and investigation; Environmental staff have a general goal of a one-hour (1-hr) response time to investigate discharges occurring at the time of notification. Discontinued discharges are to be investigated within twenty-four hours (24 hrs). Both of these goals are based on staff availability. Investigations by both City staff and the other impacted jurisdiction may be warranted.

Decisions are made according to the Storm Water Investigation Manual procedures.

Proposed Changes for Second Permit Cycle

No recommended changes.

6. Spill Response and Prevention

Permit Condition A.8.a. Co-permittees shall participate in an interagency spill response task group to ensure that a coordinated response to spills is achieved and that impacts upon aquatic resources from spilled pollutants are controlled to the MEP.

Existing Program/Activity Description

Garden City is a participant with the Ada County Hazardous Materials/Radiological Contingency Plan (cooperative agreement). This plan sets up response cooperation and coordination to hazardous material spills throughout the Boise and Garden City areas. The team trains monthly, accumulating hundreds of training hours annually.

All of the activities, including those that are hazardous material spill response related, are grouped into the monthly reports. Monthly meeting notes covering the planning efforts for coordinated emergency response to a variety of situations are recorded and identified in the City of Boise annual reports

Proposed Changes for Second Permit Cycle

No recommended changes

7. Industrial and High Risk Runoff

Permit Condition A.9.a Database of Facilities. Develop and maintain a database of priority industrial sites.

Permit Condition A.9.b. Inspection and Monitoring of High Risk Facilities. Inspect and monitor such facility for compliance with the storm water ordinance and the NPDES industrial storm water general permit.

Permit Condition A.9.c. Educational Materials. Distribute the Storm Water Commercial and Industrial Best Management Practices Handbook with inspections.

Permit Condition A.9.d. Inspection Program. Implement an inspection program of high risk industrial and other commercial facilities.

Existing Program/Activity Description

Industrial inspections of Minor Industrial Users (MIUs) of the sanitary sewer within Garden City, is routinely conducted by Garden City staff. Inspection information is tracked in a database and provides a comprehensive listing of facilities visited to date. The inspection and monitoring activities are conducted by Garden City staff through an intergovernmental Agreement with Garden City and ACHD.

The Garden City Storm Water Ordinance Brochure is provided during each inspection. The Storm Water Commercial and Industrial Best Management Practices Handbook is provided during each inspection, and made available to the public as requested.

The permit requires Garden City to participate in the development of a High Risk and Industrial Inspections Program by the Ada County Highway District. This is currently being developed by ACHD and Garden City is in cooperative participation for the development of this program. Garden City staff conduct scheduled inspections of each "High Risk" facility identified by ACHD located in our jurisdiction. Garden City staff have pursued STW Ordinance compliance at industrial and commercial facilities identified as high risk, found with illicit discharge activity at random or during pretreatment inspections, located within Garden City.

Proposed Changes for Second Permit Cycle

No recommended changes.

8. Construction Site Runoff

Permit Condition A.10.a. Co-permittees shall implement a Construction Site Discharge Control Program 18 months from the effective date of the permit.

Permit Condition A.10.b. Co-permittees shall conduct inspection of construction sites to ensure compliance with the measures outlined in II.A.10(a).

Permit Condition A.10.c. Co-permittees shall develop and maintain a database of all active and completed construction sites permitted within their jurisdiction and completed during the term of this permit.

Existing Program/Activity Description

Garden City has adopted a Construction Site Erosion Control Ordinance, Title 4, Chapter 15, and revisions. Implementation of BMP's and control methods to reduce the discharge of pollutants from construction sites. The Ordinance provides standards of compliance with program administration, planning, inspection and enforcement for each site. The City of Garden City has required by reference in the ordinance, all construction site permit applicants in which disturb the soil, to obtain certification for the Boise City Construction Site Erosion & Sediment Control Program.

Construction Site Erosion and Sediment Control Plans submitted are reviewed by staff for compliance with the ordinance and requirements. The "Internal Routing Sheet" and database are used to track the approval process for each plan submitted. In the event that a plan has not passed the review process, no permit is issued, the requests are identified on the Internal Routing Sheet, and provided to the applicant. When all requirements are met, the routing sheet may be signed by the designee, and the permit may be issued.

Ongoing inspection and compliance activities occur using general authorities provided for by City Code. Compliance actions shall be conducted under the Garden City Construction Site Erosion Control Ordinance Title 4, Chapter 15.

An inspection for each construction site permit holder is conducted during different phases of construction through the life of the project until occupancy is requested. During each inspection, the city inspector may make requests in accordance with the Construction Site Erosion & Sediment Control Ordinance Title 4, Chapter 15. Inspections of construction sites that are not being managed in accordance with the submitted and approved plans, may receive any one of the following dependant upon the enforcement procedures; "requests", "Notice of Violation", "Stop Work Order", or "Citation".

Education and outreach has been conducted to inform the public of the Construction Site Program and the adoption of the Garden City Construction Site Erosion Control Ordinance Title 4, Chapter 15. These activities have been conducted through the co-permittee education events and the Garden City monthly Newsletter, and public education materials provided to all building permit applicants. Each permit applicant is required to attend the Boise City Erosion and Sediment Control Training program as required in the Garden City Construction Site ESC Ordinance.

All erosion control plans submitted to the city are required to bear the signature and certification number of an individual who has received the Boise City Erosion and Sediment Control Certificate of Training, or training approved by the city, and who has demonstrated competence, through education, training and knowledge of the applicable laws and regulations, in erosion and sediment.

Garden City staff involved with construction activities or the implementation of this program will be required to be certified in the Boise City Erosion and Sediment Control program, or any other city approved training program. Education materials are provided to all permit applicants involved in construction activities when they request an application for a permit.

The database is used to track all aspects of the program including plan review, permits issued or denied, inspections, and enforcement actions taken for each construction site.

Proposed Changes for Second Permit Cycle

No recommended changes.

9. Public Education

Permit Condition A.11.a. Public Education Program. Implement a program to inform the public of the impact of pollutants in storm water.

Existing Program/Activity Description

The Public Education and Outreach Plan developed by Boise City for the co-permittees, identifies current program planning activities, and events. Garden City intends to meet the permit's public education and outreach requirements through participation in the MOU, providing feedback and suggestions to the co-permittees.

Garden City has implemented a Storm Drain Stenciling program. Garden City developed additional educational brochures, handouts, flyer and book-marks specific to Garden City programs; the city distributes this information to the community during activities involving the public.

City staff routinely distributes the Storm Water Commercial and Industrial BMP Handbook at city activities, events, storm water illicit discharge responses, and commercial inspections for either or both Pretreatment and Stormwater.

The Garden City Storm Water Public Education Program compliments and coordinates with the Household Hazardous Waste Program (HHW) and our curbside recycling program. The Garden City HHW program focuses on collection of materials from the waste stream, education to encourage residents to change their behaviors, and protection of natural resources in the area.

The overall curbside recycling and household hazardous waste education programs address pollution prevention for the landfill, ground water, and the Boise River.

Proposed Changes for Second Permit Cycle

No recommended changes.

Pesticide, Herbicide, and Fertilizer Application

Permit Condition A.6.a. Application Management. Copermittees shall develop a list of regionally appropriate landscaping plants and turf with recommended fertilizer application rates. Establish planting/landscape policies which encourage use of vegetation that is self sustainable without pesticides or fertilizers..

Permit Condition A.6.b. Distribution of Educational Materials. Copermittees shall distribute educational materials to all contracted applicators.

Existing Program/Activity Description

The cost share, intergovernmental coordination agreement with the co-permittees identifies public education methods and materials to be implemented by the City of Boise. These education and outreach efforts are coordinated and evaluated as identified in the Boise Public Education Plan and Timeline. *The Plant Guide*, developed by the City of Boise is utilized as application management guidance for all City of Garden City Parks and Waterways.

Garden City's Park and Recreation Department supports a well-recognized Integrated Pest Management program. City staff members responsible for application activities have attended training provided by the state of Idaho. Staff will continue to receive training on the Pesticide Management Program, provided by the State of Idaho Agriculture Department. The Garden City O & M Plan, BMP Guide is followed by city staff during routine maintenance and operations. The City of Garden City has no contracted applicators to date.

Proposed Changes for Second Permit Cycle

No recommended changes.

Idaho Transportation Department, District 3

Introduction

The Idaho Transportation Department (ITD) is an executive branch agency of the State of Idaho. ITD's duties include but are not limited to proper planning, construction, maintenance, operation and protection of the state highway system. As an executive branch state agency, ITD has very broad rule making authority. Additionally, ITD has broad intergovernmental contracting authority.

The Boise NPDES permit area is contained solely within the ITD District 3 jurisdiction. The District owns and operates roadways throughout the NPDES permit area, including I-84; I-184; SH 20/26, 21, 30, 44; Glenwood Street; Chinden Blvd.; and the Chinden-Broadway Connector. The District has entered into a cooperative agreement with the Ada County Highway District (ACHD) for maintenance of portions of most of the state highways included in the NPDES permit area. The District has 2 major outfalls in the NPDES permit area. They are located in the vicinity of Barrister Dr. at Cole and Americana Boulevard at Kathryn Davis Park.

The District coordinates with other permittees on storm water management responsibilities, especially when discharges from one permittees system flow to storm water systems owned and operated by another permittee. Coordination is implemented through formal and informal discussions, meetings, agreements and procedures. This coordination includes attending meetings, participating in special studies, identifying storm water run-on issues, and reporting spills.

1. Structural Controls

Design Manual

Permit Condition A.1.a. Co-permittees shall adopt design manuals that incorporate Best Management Practices (BMPs) and operation and maintenance criteria for all existing and future structural controls under the jurisdiction of the co-permittees. This requirement may be satisfied by adopting by reference all or elements of the design manuals and guidebooks developed by other co-permittees, including the January 1997 Boise Storm Water Best Management Practices Guidebook, the July 1994 ITD Catalog of Storm Water Best Management practices, the June 1999 City of Boise Storm Water Management Design Manual, and the December 1999 ACHD Development Policy Manual.

Existing Program/Activity Description

The District is responsible for structural controls that include roadways and associated drainage facilities, bridges, roadsides, and traffic control devices. Drainage facilities include culverts, ditches, pipes, inlets, catch basins, and retention ponds. Criteria for the design, operation and maintenance of the structural controls that collect, convey, store, treat, or discharge storm water runoff are contained in the Department's *Design Manual*, *ITD Standard Specifications for Highway Construction*, *ITD Maintenance Operations Procedures Manual*, *ITD Maintenance Manual*, and the *Catalog of Storm Water Best Practices for Highway Construction and Maintenance*.

Proposed Changes for Second Permit Cycle

Program improvements will be made as needed. No significant changes are recommended.

Operation and Maintenance

Permit Condition A.1.b. Operation and Maintenance Program. Co-permittees shall develop and implement an operation and maintenance program, to include the following:

- Definitive inspection and maintenance schedules for all co-permittee-owned structural controls which include the frequency of routine inspections. Actual inspections shall also be tracked.*
- Guidelines and criteria for maintenance activities that are to be implemented for co-permittee-owned structural controls, as well as a description of the maintenance activities required such as "disposal of sediment" and "removal of debris."*
- A description of the inspection, operation, and maintenance of storm water retention facilities owned or operated by co-permittees.*

Existing Program/Activity Description

The *ITD Maintenance Operations Manual* provides guidelines and policies for maintaining the state highway system. The *Maintenance Manual* outlines performance standards for ITD maintenance activities. The *Erosion and Sediment Control Manual* (December 2001) includes temporary and permanent erosion and sediment controls. Maintenance guidelines are included for these controls. ITD incorporates storm water management into its in-house inspection certification and training courses. Courses include information on inspections to ensure proper

BMP installation and use. In addition, federal and state laws as well as local ordinances are used as guides for ITD maintenance operations.

A *Maintenance Storm Water Manual* has also been developed for District 3 maintenance activities. It includes a description of the inspection and maintenance schedule, routine maintenance activities, and record keeping practices to track inspection and maintenance activities.

Proposed Changes for Second Permit Cycle

Program improvements will be made as identified. No significant changes are recommended.

Record Keeping

Permit Conditions A.1.c. Inspection and Maintenance Record Keeping. Each co-permittee that owns or operates structural controls shall maintain an internal record-keeping system to track inspections and maintenance for those portions of the MS4 operated by the co-permittee.

Existing Program/Activity Description

The time devoted to inspection and maintenance activity is tracked on time sheets (Activity Code M251 Drainage Repair / Cleaning). Record-keeping improvements will continue to be made to enhance tracking of these activities.

Proposed Changes for Second Permit Cycle

Program improvements will be made as identified. Opportunities for improving tracking of maintenance activities will be identified. No significant changes are recommended.

Floatables

Permit Condition A.2.b. The co-permittees shall implement a program or programs, such as the Adopt-a-Highway program, to facilitate litter removal from selected highways two times a year or as needed.

Permit Condition A.2.c. The co-permittees shall ensure that the streets for which they have maintenance authority and responsibility are swept as needed to reduce the discharge of pollutants to the MEP. Co-permittees shall compile a report on the sweeping activity and shall assess the above levels of effort in each of the designated land use type areas with respect to the mitigation of contribution of pollutants from the highways and other public areas that are maintained.

Existing Program/Activity Description

Both ITD maintenance crews and “Adopt-A-Highway” sponsors conduct litter pickup on a continuing basis. The Maintenance section administers the “Adopt-A-Highway” program, a voluntary litter pickup program. Litter is picked up twice per year, as mandated by the Adopt-a-Highway work agreement.

Sweeping of all ITD roads within the permit area, except for I-84 is done by ACHD through a cooperative agreement. Sweeping activity conducted under this agreement is tracked by ACHD. An evaluation of the adequacy of the level of effort on state highways within the permit area has been done by ACHD as part of the overall evaluation of their sweeping activities. Sweeping activity by the District is conducted as needed and within 48 hours of every deicing event when sand and/or salt is used.

Records are kept for time charges of maintenance foremen and engineers. Records are kept for time and location of lane miles swept (Activity Code M418: Sweeping and cleaning pavement and shoulders and dust abatement).

Proposed Changes for Second Permit Cycle

Program improvements will be made as needed. No significant changes are recommended.

2. Roadways

Permit Condition A.4.a. Co-permittees shall develop a management practices program. This program shall include those management practices identified during the inventory of co-permittee-owned storm water facilities and audit of site activities undertaken as part of the application for the MS4 Permit. This program shall also evaluate ways to reduce pollutant discharges associated with road maintenance and rehabilitation operations.

Permit Condition A.4.b. C-permittees shall monitor the application of chemicals and sand applied to roadways for snow and ice control. Co-permittees shall implement programs for proper storage of de-icing materials to prevent materials from entering the storm sewer system, and research alternatives to salt for use in de-icing.

Existing Program/Activity Description

The management practices are currently outlined in the Department's *Design Manual, ITD Standard Specifications for Highway Construction, ITD Maintenance Operations Procedures Manual, ITD Maintenance Manual, and the Erosion and Sediment Control Manual*. On right-of-ways controlled by the ITD, storm water facilities are inspected and cleaned on an annual basis or as needed as local conditions warrant. The Maintenance section removes debris and vacuums and flushes ditches and culverts annually or as needed. Excess material is removed and disposed of in an approved manner. Litter pickup is conducted on a continuing basis by both ITD maintenance crews and "Adopt-A-Highway" sponsors.

The District has entered into a cooperative agreement with the Ada County Highway District (ACHD) for operation of portions of most of the state highways included in the NPDES permit area, with the exception of the interstate highway, I-84. ACHD conducts maintenance in the areas covered by this agreement.

A sand/salt mixture and magnesium chloride is currently used for deicing activities on state highways. Containment for the sand/salt mixture is provided through the use of an impervious liner in an evaporative detention pond for run off with no potential for getting into the storm drain system. The District will have a shed put up this year however to replace the need for detention pond. The Orchard site shed is slated for construction in 2008 due to higher priority need in higher precipitation areas and the isolated location of the sand salt pile.

An anti-icing database is utilized by the District to track application of magnesium chloride on roads within the District. Records are kept for time charges of maintenance foremen and engineers. (Activity Codes M331: Plowing Snow and

Sand/Salt; M334: Other Snow and Ice; M335: Prep and Cleanup/Plowing and Sanding and M336 "Chemical Anti-icing / Deicing").

Proposed Changes for Second Permit Cycle

Program improvements will be made as identified. The District will continue to characterize the MS4 under its jurisdiction. No significant changes are recommended.

3. Flood Management

Permit Condition A.5.a. Co-permittees shall complete an inventory of all existing structural flood control devices within their jurisdictions to determine the feasibility of retrofitting them to provide additional pollutant removal.

Permit Condition A.5.b. Co-permittees shall develop procedures to assure that flood management projects assess the impacts on the water quality of the receiving water.

Program/Activity Description

The NPDES Permit defines “structural flood control device” to mean a device which has been designed and installed for the purpose of storm drainage during storm events. The District’s system was designed and built to convey runoff from the right of way. None of the District’s facilities are operated as flood control facilities.

Proposed Changes for Second Permit Cycle

ITD should not be subject to this permit condition because the District has no flood management authority or flood management projects. No permit changes are proposed. The District was not subject to this permit condition in the last permit cycle. The District should not be subject to this permit condition during the next permit cycle because it does not apply to the District’s system.

4. Illicit Discharges and Improper Disposal

Permit Condition A.7. Each co-permittee shall implement an ongoing program to detect and remove illicit discharges and improper disposal into the MS4. Each co-permittee shall prevent un-permitted discharges of dry and wet weather overflows from sanitary sewers into the MS4. Each co-permittee shall limit the infiltration of seepage from sanitary sewers into the MS4.

Permit Condition A.7.a. Co-permittees shall work together to implement a program to inspect and enforce against illicit connections. The program shall include a requirement to update the inventory of all major outfalls within the jurisdictions of the co-permittees.

Permit Condition A.7.c. Co-permittees shall implement complaint investigation procedures to guide staff through recording, investigating and following up on complaints regarding violations reported by the general public.

Existing Program/Activity Description

The District has entered into a cooperative agreement with the Ada County Highway District (ACHD) for operation of portions of most of the state highways included in the NPDES permit area, with the exception of the interstate highway, I-84. ACHD responds to complaints in the areas covered by this agreement.

ITD is responsible for finding and removing any illegal discharge or dumping along other roads within its jurisdiction. Maintenance Foremen routinely inspect and maintain ITD roadway sections for illicit connections and illegal dumping. If an inspection reveals a problem, or if the ITD is notified of an incident in other ways, the responsible party is notified and the connection is terminated. Complaint investigation procedures are in place and are described in the *Complaint Response Manual*. The District also coordinates with the co-permittees in receiving and responding to citizen complaints.

Unauthorized and nonstandard encroachments are prohibited and they may be removed or their use may be suspended (IDAPA 39.03.42, 802.). It is this provision that gives ITD the authority to control illicit discharges and illegal connections to their MS4.

Proposed Changes for Second Permit Cycle

The District will continue to characterize discharges to and from its system and those under the jurisdiction of other co-permittees. Program improvements will be made as needed. No significant changes are recommended.

5. Spill Response and Prevention

Permit Condition A.8.a. Co-permittees shall participate in an interagency spill response task group to ensure that a coordinated response to spills is achieved and that impacts upon aquatic resources from spilled pollutants are controlled to the MEP.

Existing Program/Activity Description

ITD has in place an Emergency Response Program and a Hazardous Materials/Hazardous Waste Program to deal with the prevention, response, and containment of any spills that occur on ITD right-of-way. Several other agencies also participate in the State Response System. Spill records are kept by the Idaho State Police. In Ada County, Ada County Emergency Management coordinates these activities.

Proposed Changes for Second Permit Cycle

Attendance of spill response task group meetings has provided limited benefit. It is recommended that this requirement be eliminated during the next permit cycle.

6. Construction Site Runoff

Permit Condition A.10.a. Co-permittees shall implement a Construction Site Discharge Control Program 18 months from the effective date of the permit.

Permit Condition A.10.b. Co-permittees shall conduct inspection of construction sites to ensure compliance with the measures outlined in II.A.10(a).

Permit Condition A.10.c. Co-permittees shall develop and maintain a database of all active and completed construction sites permitted within their jurisdiction and completed during the term of this permit.

Existing Program/Activity Description

Language addressing storm water control is included in ITD construction project contracts. Specific information concerning contractor responsibility for the containment and management of storm water is included in the Special Provisions section of the construction contract.

The Department's *Design Manual*, *ITD Standard Specifications for Highway Construction*, the *Contract Administration Manual*, and the *Erosion and Sediment Control Manual* (December 2001) contain sections devoted to erosion and pollution control measures for application on active construction sites. These BMPs help to minimize the erosion and sedimentation generated during the construction phase of a project.

Proposed Changes for Second Permit Cycle

The *Erosion and Sediment Control Manual* is currently being updated and revised by the ITD Headquarters staff. Completion of this revision is expected to occur within the next year. Other program changes will be made as identified. No significant changes to the NPDES Permit are recommended.

7. Public Education

Permit Condition A.11.a. Public Education Program. Implement a program to inform the public of the impact of pollutants in storm water.

Existing Program/Activity Description

District 3 has supported education and outreach activities implemented by Boise City, as the lead co-permittee for this program activity.

Proposed Changes for Second Permit Cycle

The District will continue to support education and outreach activities conducted by other co-permittees that address problems that can potentially impact the District's system. The District proposes to increase the amount of internal education and outreach to District employees. No significant changes are recommended.

C. Proposed Monitoring Program Elements

Storm Event Discharges

An evaluation of the storm water monitoring program requirements was performed based on the results of the program through water year 2004. The NPDES Permit does not include effluent limits for storm water discharged from the Boise and Garden City area MS4. Therefore, to evaluate the chemical analyses included in the storm water monitoring program and the storm water monitoring requirements of the NPDES Permit, criteria from the sources listed below, in order of preference, were consulted.

- The findings of the lower Boise River Total Maximum Daily Load (TMDL) study (Idaho Department of Environmental Quality 1999)
- Lower Boise River Implementation Plan (Idaho Department of Environmental Quality 2003)
- State of Idaho instream water quality criteria in Water Quality Standards and Waste Water Treatment Requirements (IDAPA 58.01.02)
- U.S. EPA National Recommended Water Quality Criteria (U.S. EPA 2002a, 2003a)
- U.S. EPA Nutrient Ecoregional Criteria (U.S. EPA 2000)

Water quality criteria consulted for this evaluation were obtained from State of Idaho and Federal guidance that was current as of August 2004. As State of Idaho and Federal regulations are revised in the future, it may be appropriate to request modifications to specific monitoring requirements.

Criteria used in the evaluation were, in many cases, intentionally overly conservative for such an application. However, because they are conservative, they are useful in determining which components historically included in the storm water monitoring program do not appear to pose a threat to the water quality of the lower Boise River. Many of the water quality criteria considered during this evaluation (specifically some in IDAPA 58.01.02 and the U.S. EPA National Recommended Water Quality Criteria) are instream values while storm water samples are collected directly from the MS4 or at an outfall from the MS4. Instream concentrations resulting from the MS4 discharge are likely to be much lower than concentrations in the MS4, due to mixing and dilution. Recommendations for changes to the storm water monitoring requirements for the next permit cycle, based on the results of the storm water monitoring program data evaluation, are presented in the following subsections.

Recommendations for the Second Permit Cycle

Recommendations for specific elements of the storm water monitoring program are presented below. Table 1 in Attachment D summarizes these recommendations.

Parameters Without Modification

The following parameters are currently monitored and it is recommended that monitoring of these parameters be continued without modification:

- pH
- Temperature
- *E. coli*
- Biological oxygen demand (BOD)
- Chemical oxygen demand (COD)
- Total suspended solids (TSS)
- Total dissolved solids (TDS)
- Hardness
- Total phosphorus
- Orthophosphate
- Total mercury
- Oil & grease

Discontinued Parameters

The following parameters are currently monitored and it is recommended that monitoring of these parameters be discontinued.

- Fecal Coliform - While not included in the NPDES Permit monitoring requirements, fecal coliform was initially included in this program because a TMDL was established for the lower Boise River for this parameter. However, fecal coliform is no longer monitored because State of Idaho surface water quality criteria are now based on *E. coli* concentrations.
- Nitrate, Nitrite, Nitrate + Nitrite - While not included in the NPDES Permit monitoring requirements, nitrate, nitrite and nitrate + nitrite have been included in this monitoring program at times. However, monitoring of these parameters will be discontinued. The maximum detected concentration of nitrate is less than the evaluation criterion (National Recommended Water Quality Criteria).
- Total Kjeldahl Nitrogen (TKN) - Analysis of TKN in composite samples should be eliminated because no criterion was identified for it.
- Selected Total and Dissolved Metals - Discontinue monitoring of total and dissolved arsenic, total cadmium, total and dissolved chromium, total copper, total and dissolved lead, dissolved mercury, total and dissolved nickel and total zinc because the maximum concentrations for the dissolved

fractions of these metals have been less than the evaluation criteria (State of Idaho instream water quality criteria) and no criteria for these total metals have been identified. It should be noted that total and dissolved chromium were not included in the NPDES Permit monitoring requirements, but have been included in this monitoring program at times.

- Total Recoverable Petroleum Hydrocarbons (TrPH) / n-Hexane Extractable Material, SGT (SGT-HEM) - Analyses of oil & grease and other organic components will provide an indication of petroleum impacts to the MS4 discharges and no regulatory criteria applicable to TrPH or SGT-HEM have been identified.
- Base/Neutral and Acid Organics (BNAs) - Of the ten BNAs detected to date, six (acetophenone, bis (2-ethylhexyl) phthalate, di-n-octyl phthalate, 2-methylphenol, 3- and 4-methylphenol (reported as a single parameter) and 4-nitrophenol) have had reported concentrations less than the laboratory reporting limit, two (di-n-butyl phthalate and phenol) were detected at concentrations at least three orders of magnitude less than State of Idaho instream water quality criteria, and no applicable water quality criteria were identified for the other two (benzyl alcohol and butyl benzyl phthalate).
- Organophosphate Pesticides - None of these compounds have been detected in any of the storm water monitoring program samples.
- Organochlorine Pesticides - The two organochlorine pesticide components detected by this program (gamma-BHC and 4,4'-DDT) were each found in only 1 of 62 samples, were present in concentrations less than State of Idaho instream water quality criteria and were also less than the laboratory reporting limits.
- Pesticide Organics - The NPDES Permit currently requires that storm water samples be analyzed for pesticide organics using EPA method 8081 or 8270. This is a duplicative requirement since these analyses are used for other groups of parameters. Therefore, this requirement should be removed from the NPDES Permit.

Modified Parameters

Modification of sampling or analysis procedures is recommended for the parameters discussed below.

- Dissolved Oxygen (DO) - Field measurement of DO in grab samples should be performed rather than measurement in composite samples because DO is extremely sensitive to a variety of factors associated with sample handling including agitation, exposure to atmospheric oxygen, and temperature variations.
- Metals - The NPDES Permit requires the use of method 200.8 for most metals analyses. The use of this method requires dilution of the sample, which may result in a higher detection limit than if another EPA-approved

method were used. Therefore, the NPDES Permit should allow the use of other EPA-approved methods, in addition to 200.8, for metals analyses.

- Volatile Organic Compounds (VOCs) - Monitoring requirements for VOCs should be limited to specific VOCs detected to date: at concentrations greater than the laboratory reporting limit; for which no criteria were identified; and are likely to be associated with possible illicit discharges. These components are: acetone, 2-butanone and 4-methyl-2-pentanone. Consistent with the VOC monitoring schedule described in the current NPDES Permit, VOCs should be evaluated in two samples from each monitoring station during the second and fourth years of NPDES Permit coverage. Other VOCs were detected in storm water samples, but were either reported at concentrations less than the laboratory reporting limit or were lower than the identified water quality criteria.
- Water Volume - All water volume measurements should be reported in cubic feet (ft³). Currently, cubic feet are required in Table IV.A while gallons are required in Part IV.A.2.d of the NPDES Permit.

Added Parameters

The following additions are recommended for storm water sample analyses.

- Ammonia - State of Idaho instream water quality criteria were identified for ammonia. However, directly applicable criteria were not identified for TKN, which is currently required by the NPDES Permit. Therefore TKN should be removed (as discussed above) from the monitoring program and replaced with ammonia.
- Zinc - Dissolved - The NPDES Permit does not currently require analysis of dissolved zinc. However, this parameter was included in this program prior to the NPDES Permit effective date. The maximum detected concentration for this component is greater than the State of Idaho instream water quality criteria.

Sediment Analysis

Sediment and decant water are retained in structures that are part of the MS4. Instead of being discharged to the lower Boise River, these materials are removed from the Boise and Garden City area MS4 as part of routine system maintenance. Regulations regarding disposal options for these materials are, therefore, the most relevant consideration for evaluating monitoring requirements.

The NPDES Permit requires that sediment and decant water samples be collected from catch basins. The co-permittees recommend that the NPDES Permit allow for the collection of sediment/decant water samples from sand and grease traps. Sediment sampling locations and reasons for sampling sand and grease traps

were submitted to the Director of the Office of Water in a letter dated May 31, 2001.

The sediment/decant water monitoring program includes the analysis of various components in two different media: decant water and sediment. The NPDES Permit specifies the components to be included in this monitoring program, but does not specify which components should be evaluated in which media. Table 2.a in Attachment D summarizes the current sediment and decant water monitoring program strategy.

The following discussion makes specific recommendations for which components should be evaluated in each medium. Table 2.b in Attachment D summarizes these recommendations.

Decant Water

Recommendations for the Second Permit Cycle

Parameters Without Modification

The following parameters are currently monitored in decant water and it is recommended that monitoring of these parameters be continued without modification.

- *E. coli*
- Total phosphorus
- Orthophosphate
- Total arsenic, cadmium, chromium, copper, lead, nickel and zinc

Discontinued Parameters

The following parameters are currently monitored in decant water and it is recommended that monitoring of these parameters be discontinued.

- TSS - The laboratory decanting process is significantly different from the processes in ACHD's sediment separation facilities. Therefore, TSS results for the decant water samples are not likely to be representative of the wastewater discharged from the sediment separation facilities.
- Dissolved Metals - Total metals monitoring will provide sufficient data to support characterization of the decant water.
- TrPH / SGT-HEM - Oil & grease (recommended, below, for inclusion in the program) is the analysis typically required by publicly owned treatment works (POTWs) to assess waste streams.

Modified Parameters

The following modification is recommended for decant water analyses.

- VOCs - Limit requirements for analysis of VOCs in decant water to those VOCs that have, to date, been detected in such samples, at concentrations greater than laboratory reporting limits. Those VOCs are: acetone, 2-butanone, chloroform, 2-hexanone, 4-isopropyltoluene, 4-methyl-2-pentanone, naphthalene, and toluene. It should be noted that five other VOCs have been reported as estimated concentrations, below the laboratory reporting limit. The compounds with estimated concentration results do not appear to be present in significant concentrations in samples collected as part of this program and, therefore, should not continue to be included in the program.

Added Parameter

The following addition is recommended for decant water analyses.

- Oil & Grease - Oil & grease is the analysis typically required by POTWs to assess waste streams.

Sediment

Recommendations for the Second Permit Cycle

Parameters Without Modification

The following parameters are currently monitored in sediment and it is recommended that monitoring of these parameters be continued:

- Arsenic
- Cadmium
- Chromium
- Lead

Discontinued Parameters

The following parameters are currently monitored in sediment and it is recommended that monitoring of these parameters be discontinued.

- Total Phosphorus - Phosphorus in waste solids is typically not a regulatory concern except for situations where there is a potential for leachate from the solids to affect surface waters. This is unlikely since leachate from solid waste disposal facilities must be contained.
- TrPH - Analyses of other organic components will provide an indication of potential petroleum impacts to the MS4.

- Selected Metals - Discontinue analysis of copper, nickel and zinc since these metals are typically not a regulatory concern for solid waste disposal.

Modified Parameters

Modification of sampling or analysis procedures is recommended for the following parameters:

- VOCs - Limit requirements for analysis of VOCs in sediment to those VOCs that have, to date, been detected in such samples, at concentrations greater than laboratory reporting limits. Those VOCs are: acetone, 1,2-dichloroethane, 4-isopropyltoluene, toluene and 1,2,4-trichlorobenzene.
- Poly-aromatic Hydrocarbons (PAHs) - Limit analysis for PAHs in sediment to those PAHs that have, to date, been detected in such samples, at concentrations greater than laboratory reporting limits. Those PAHs are: benzo (a) anthracene, benzo (b) fluoranthene, benzo (k) fluoranthene, benzo (ghi) perylene, benzo (a) pyrene, chrysene, fluoranthene, phenanthrene and pyrene.

Added Parameters

In addition to the metals recommended for continued inclusion, above, data regarding concentrations of the metals listed below are likely to be useful in determining disposal options for sediment removed from the MS4. Therefore, it is recommended that these metals be added to the analyses for sediment samples.

- Barium
- Mercury
- Silver

Floatables

Recommendations for the Second Permit Cycle

Require the volume of floatable material collected be reported in ft³ rather than cubic yards since the maximum volume of floatable materials removed at any one time as part of this program was 1.5 ft³.

Dry Weather Discharges

No recommended changes.

References

- Idaho Department of Environmental Quality. 2003. Implementation Plan for the Lower Boise River Total Maximum Daily Load. Boise, Idaho: State of Idaho Department of Environmental Quality.
- Idaho Department of Environmental Quality. 1999. Lower Boise River TMDL: Subbasin Assessment, Total Maximum Daily Loads. Boise, Idaho: State of Idaho Department of Environmental Quality.
- US EPA. 2003. Revised National Recommended Water Quality Criteria for the Protection of Human Health. Washington, District of Columbia: United States Environmental Protection Agency, Office of Water.
- US EPA. 2002. National Recommended Water Quality Criteria: 2002. Washington, District of Columbia: United States Environmental Protection Agency, Office of Water, Office of Science and Technology
- US EPA. 2000. Ambient Water Quality Criteria Recommendations: Information Supporting the Development of State and Tribal Nutrient Criteria; Rivers and Streams in Nutrient Ecoregion III. Washington, District of Columbia: United States Environmental Protection Agency, Office of Water

D. Other Suggested Permit Changes

This section addresses proposed permit language modifications. The co-permittees recommend that the following issues be addressed in the NPDES Permit issued for the next permit cycle and have proposed specific language to accomplish this.

1. Part I. Modify language as it relates to co-permittee obligations (Part I.C. of the current permit) as follows:

C. Co-permittees

City of Boise (Boise City)
City of Garden City (Garden City)
Ada County Highway District (ACHD)
Boise State University (BSU)
Idaho Transportation Department District 3 (ITD)
Ada County Drainage District #3 (DD3)

1. Each co-permittee shall be individually obligated (and the remaining co-permittees shall not be obligated) to comply with those terms or conditions of this permit which:
 - a. relate exclusively to discharges from portions of the MS4 owned or operated solely by that co-permittee;
 - b. are identified in this permit as being the obligation of a single, named co-permittee;
 - c. have been identified in the Cooperative Agreement approved by EPA under Part II.F. of this permit as being the responsibility of that co-permittee.

Rationale: Joint and several liability language does not consider the fact that Co-permittees are independent government or quasi-government bodies with vastly different degrees of ownership of municipal separate storm sewer system, the statutory powers held by each and the limited resources to implement the requirements of the NPDES program.

2. Part II. Add the following language to the introduction:

Permittees shall develop and implement a Storm Water Management Program which shall include all controls necessary to reduce the discharge of pollutants from the MS4 to the maximum extent practicable ("MEP"). The Storm Water Management Program should employ best management practices ("BMPs"), control techniques, system design and engineering methods, and other appropriate provisions.

All plans requiring submittal for review and approval shall be submitted to the U.S. Environmental Protection Agency ("EPA") who shall have the right to disapprove, or require modifications for approval to plans, within sixty (60) days of receipt. If EPA does not disapprove such plans within sixty (60), they shall be deemed approved.

Rationale: Provides for closure and timely review of minor modifications and imposes upon EPA a review standard. It is consistent with the language contained in the Anchorage Permit.

3. Part II.A.5. Flood Management. Modify references to the co-permittees as follows:

Any ~~Each~~ co-permittee which possesses or is granted flood management authority

Rationale: Clarifies that flood management permit requirements only apply to those co-permittees that possess or have been granted flood management authority.

4. Section II.C. Modify the following language to include full range of legal authorities as follows:

LEGAL AUTHORITY. Each co-permittee shall operate pursuant to legal authority established by statute, ordinance, policy or ~~series of~~ contracts which authorizes or enables the co-permittee at a minimum to:

1. Control through statute, ordinance, policy, permit, contract, court or administrative order or other similar means, the contribution of pollutants to the MS4 by storm water discharges associated with industrial activity and the quality of storm water discharged from sites of industrial activity;
2. Prohibit through statute, ordinance, policy, permit, contract, court or administrative order or other similar means, illicit discharges to the MS4;
3. Control through statute, ordinance, policy, permit, contract, court or administrative order, or other similar means, the discharge to the MS4 of spills, dumping or disposal of materials other than storm water;
4. Control through interagency agreements among co-permittees the contributions of pollutants from one portion of the MS4 to another portion of the MS4;

5. Require compliance with conditions in statutes, ordinances, policy, permits, contracts or court or administrative orders; and
6. Carry out all inspection, surveillance and monitoring procedures necessary to determine compliance and noncompliance with permit conditions including the prohibition on illicit discharges to the MS4.

Rationale: This change will clarify the types of legal authority available to the co-permittees.

5. Section II.F. Modify text to require an updated Cooperative Agreement.
6. Eliminate Table III.A.

Rationale: The current table is incomplete and has caused confusion.

7. Section IV. E.1. Change the location of the public repository of all annual reports, including monitoring summaries to the Boise State University Library.
8. Section IV.E.1. A few of these items appear to be redundant and can be incorporated in existing requirements: 1) Delete item “d” and include as part of “a” and “h” and 2) Delete “f” and include as part of “a”.
9. Section IV.E.1.c. Revise text to acknowledge reapplication if included in permit.
10. Section IV.E.1. For clarification purposes, the co-permittees recommend that item “i” include, by list, “All other information required by this Permit ...”.
11. Section IV.E.2. Change the requirement for provision of information by co-permittees for the annual report from 45 days to 35 days prior to the report due date.
12. Section IV.E.3. The correct zip code for the Idaho DEQ is 83706
13. Section V. Add the following language with regard to pollution trading:

The co-permittees are authorized to develop and implement water quality trading credit plans for purposes of complying with MS4 discharge limitations as authorized by any approved current or future TMDLs, and otherwise fulfilling stated and documented organizational goals and objectives relating to watershed management. The authority for pollutant trading is derived from IDAPA 58.01.02.054 and 58.01.02.350; Section 402 of the Federal Clean Water Act 33 U.S.C. 1342; and the U.S. Environmental Protection Agency’s policies on Water Quality Trading (1/13/03) and Watershed-Based NPDES Permitting (1/7/03).

Rationale: Provides flexibility to accomplish pollution trading, removes the risk of a moratorium on additional MS4 development due to a third party lawsuit, and reduces program costs.

14. Section V.K2. Delete reference to DMRs.

15. Section V.N.4.a. There is not an EPA developed DMR or other EPA-provided or specified form for MS4 stormwater reporting, therefore the reference to reporting monitoring information in this manner should be modified. Proposed modification:

“Monitoring results must be reported as part of the annual report required by Part IV.E. of this permit ~~on a DMR or other form provided or specified by the Water Office Director~~ for reporting results of sludge use or disposal practices.”

16. Section N.4.b. There is not an EPA developed DMR or other EPA provided or specified form for MS4 stormwater reporting therefore the reference to reporting monitoring information in this manner should be modified. Proposed modification:

“If co-permittees monitors any pollutant more frequently than required by the permit using test procedures approved under 40 CFR Part 136 or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted as part of the annual report required by Part IV.E. of this permit. ~~in the DMR specified by the Water Office Director.~~”

Attachment B. Boise City Stormwater Management Plan Evaluation Table

Table B1.

Pollutant¹	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
1. Nutrients	<ul style="list-style-type: none"> Residential fertilizer use and landscape runoff to the MS4 Commercial, industrial, and institutional fertilizer use and landscape runoff to the MS4 Runoff and delivery of litter and vegetation to the MS4 (decomposition by 	<ul style="list-style-type: none"> Illicit sewer connections Seepage into the MS4 from failed septage systems Seepage into the MS4 from nutrient laden ground water Uncovered outside fertilizer storage at sites that drain to the MS4 	<p>Property Maintenance and Good Housekeeping</p> <ul style="list-style-type: none"> Boise Stormwater Facility Inventory and Operation and Maintenance Boise Parks and Recreation Integrated Pest Management (IPM), Litter Collection, and Pet Waste Control <p>Education and Outreach (joint)</p> <ul style="list-style-type: none"> Storm Drain Marking Watershed Outreach Household Hazardous Waste Collection 	Yes	None

¹ Table 1 definitions: **Pollutant** – a comprehensive list of categories of pollutants found in local stormwater discharges; **Known Controllable Sources** – sources or waste streams that are under the jurisdiction of one or all of the Co-Permittees and are known to currently contribute to stormwater quality degradation; **Potential Controllable Sources** - sources or waste streams that are under the jurisdiction of one or all of the Co-Permittees and may contribute to stormwater quality degradation either currently or in the future; **Existing Controls** – best management practices and SWMP elements currently implemented for permit compliance; **Adequacy of Controls** – based on (1) federal regulations that may be difficult to met, (2) potential to cause of contribute to a water quality objective being exceeded, or (3) an adverse or worsening environmental condition; and, **New Control Measures** - best management practices and additional SWMP elements proposed to ensure federal regulation compliance.¹ During discussions among the Boise MS4 Co-Permittees an additional “pollutant” category was suggested that was entitled “Other Pollutants.” Instead of identifying specific pollutants, this category was a list of activities associated with small volumes of pollutant laden discharges to the MS4. These activities were right-of-way cleaning and non-profit vehicle washing activities. Rather than listing another “pollutant” category that only identifies activities, these activities and the associated proposed BMPs have been included in this table under each related pollutant category.

Pollutant ¹	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
	products) <ul style="list-style-type: none"> • Improper disposal of fertilizer and pet waste to the MS4 • Delivery of detergent laden wash water to the MS4² • Runoff and delivery of soil to the MS4 		<ul style="list-style-type: none"> • Community Curriculum Structural/Non-Structural <ul style="list-style-type: none"> • Boise Drainage Design Standards • City Construction Site Erosion and Sediment Control Illicit Discharge Detection and Elimination <ul style="list-style-type: none"> • Stormwater Pollution Hotline and Complaint Notification and Response (participant) • Boise Stormwater Ordinance • Emergency Hazardous Material Spill Response (Boise Fire Department) 		

² The Boise Non-Stormwater Disposal Best Management Practices does not allow detergent laden wash water from commercial vehicle and property washing activities storm drain use. And, non-profit and residential vehicle washing activities are subject to the general best management practices identified.

Pollutant	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
2. Temperature	<ul style="list-style-type: none"> • Hot pavement runoff 	<ul style="list-style-type: none"> • Illicit hot water connections • Discharge or seepage of geothermal waters to the MS4 	<p>Property Maintenance and Good Housekeeping</p> <ul style="list-style-type: none"> • Boise Stormwater Facility Inventory and Operation and Maintenance <p>Education and Outreach (joint)</p> <ul style="list-style-type: none"> • Watershed Outreach • Community Curriculum <p>Structural/Non-Structural</p> <ul style="list-style-type: none"> • Boise Drainage Design Standards <p>Illicit Discharge Detection and Elimination</p> <ul style="list-style-type: none"> • Boise Stormwater Ordinance 	Yes	None

Pollutant	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
3. Sediment	<ul style="list-style-type: none"> • Runoff and delivery of soil and dust to the MS4 • Runoff and delivery of litter and vegetation to the MS4 (decomposition by products) 	<ul style="list-style-type: none"> • Illicit sewer connections 	<p>Property Maintenance and Good Housekeeping</p> <ul style="list-style-type: none"> • Boise Stormwater Facility Inventory and Operation and Maintenance • Boise Parks and Recreation Litter Collection and Pet Waste Control <p>Education and Outreach (joint)</p> <ul style="list-style-type: none"> • Storm Drain Marking • Watershed Outreach • Recycling Program • Community Curriculum <p>Structural/Non-Structural</p> <ul style="list-style-type: none"> • Boise Drainage Design Standards • Boise Construction Site Erosion and Sediment Control <p>Illicit Discharge Detection and Elimination</p> <ul style="list-style-type: none"> • Stormwater Pollution Hotline and Complaint Notification and Response (participant) • Boise Stormwater Ordinance 	Yes	None

Pollutant	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
4. Bacteria	<ul style="list-style-type: none"> • Illicit storm drain pet waste and septage use • Runoff and delivery of bacteria and bacteria laden soil to the MS4 	<ul style="list-style-type: none"> • Illicit sewer connections • Seepage to the MS4 from failed septage systems • Seepage to the MS4 of bacteria laden ground water 	<p>Property Maintenance and Good Housekeeping</p> <ul style="list-style-type: none"> • Boise Stormwater Facility Inventory and Operation and Maintenance • Boise Parks and Recreation Litter Collection and Pet Waste Control <p>Education and Outreach (joint)</p> <ul style="list-style-type: none"> • Storm Drain Marking • Watershed Outreach • Community Curriculum <p>Structural/Non-Structural</p> <ul style="list-style-type: none"> • Boise Drainage Design Standards • Boise Construction Site Erosion and Sediment Control <p>Illicit Discharge Detection and Elimination</p> <ul style="list-style-type: none"> • Stormwater Pollution Hotline and Complaint Notification and Response (participant) • Boise Stormwater Ordinance • Emergency Hazardous Material Spill Response (Boise Fire Department) 	Yes	None

Pollutant	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
5. Floatables	<ul style="list-style-type: none"> • Runoff and delivery of litter and vegetation to the MS4 	None	<p>Property Maintenance and Good Housekeeping</p> <ul style="list-style-type: none"> • Boise Stormwater Facility Inventory and Operation and Maintenance Program • Boise Parks and Recreation Litter Collection and Pet Waste Control programs <p>Education and Outreach (joint)</p> <ul style="list-style-type: none"> • Storm Drain Marking • Watershed Outreach • Recycling Program • Community Curriculum <p>Structural/Non-Structural</p> <ul style="list-style-type: none"> • Boise Construction Site Erosion and Sediment Control <p>Illicit Discharge Detection and Elimination</p> <ul style="list-style-type: none"> • Stormwater Pollution Hotline and Complaint Notification and Response Program (participant) • Boise Stormwater Ordinance 	Yes	None

Pollutant	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
6. Pesticides	None	<ul style="list-style-type: none"> • Residential pesticide use and landscape runoff to the MS4 • Commercial, industrial, and institutional pesticide use and landscape runoff to the MS4 • Improper disposal of fertilizer and pet waste to the MS4 • Uncovered outside pesticide storage at sites that drain to the MS4 • Runoff and delivery of pesticide laden soil, vegetation, and litter to the MS4 • Illicit applications and connections • Seepage to the MS4 from pesticide laden ground water 	<p>Property Maintenance and Good Housekeeping</p> <ul style="list-style-type: none"> • Boise Stormwater Facility Inventory and Operation and Maintenance Program • Boise Parks and Recreation Integrated Pest Management (IPM) <p>Education and Outreach (joint)</p> <ul style="list-style-type: none"> • Storm Drain Marking • Watershed Outreach • Household Hazardous Waste Collection Program • Recycling • Community Curriculum <p>Structural/Non-Structural</p> <ul style="list-style-type: none"> • Boise Drainage Design Standards • Boise Construction Site Erosion and Sediment Control <p>Illicit Discharge Detection and Elimination</p> <ul style="list-style-type: none"> • Stormwater Pollution Hotline and Complaint Notification and Response Program 	Yes	None

Pollutant	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
			(participant) <ul style="list-style-type: none"> • Boise Stormwater Ordinance • Emergency Hazardous Material Spill Response (Boise Fire Department) 		

Pollutant	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
7. Hazardous Materials	None	<ul style="list-style-type: none"> • Hazardous material spills to the MS4 • Improper disposal of hazardous materials to the MS4 • Uncovered outside hazardous materials storage, handling, and loading/unloading activities at sites that drain to the MS4 • Residential hazardous material use and runoff to the MS4 • Commercial, industrial, and institutional hazardous material use and runoff to the MS4 • Seepage to the MS4 from hazardous compounds contained in ground water 	<p>Property Maintenance and Good Housekeeping</p> <ul style="list-style-type: none"> • Boise Stormwater Facility Inventory and Operation and Maintenance Program³ • Boise Parks and Recreation Integrated Pest Management (IPM) <p>Education and Outreach (joint)</p> <ul style="list-style-type: none"> • Storm Drain Marking • Watershed Outreach • Household Hazardous Waste Collection Program • Community Curriculum <p>Structural/Non-Structural</p> <ul style="list-style-type: none"> • Boise Drainage Design Standards • City Construction Site Erosion and Sediment Control <p>Illicit Discharge Detection and Elimination</p> <ul style="list-style-type: none"> • Stormwater Pollution Hotline and Complaint Notification 	Yes	None

³ Includes spill response training and planning.

Pollutant	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
			and Response Program (participant) <ul style="list-style-type: none"> • Boise Stormwater Ordinance • Emergency Hazardous Material Spill Response (Boise Fire Department) 		

Pollutant	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
8. Metals	None	<ul style="list-style-type: none"> • Metal laden spills, parking lots, driveways, and right-of-way discharges to the MS4 • Improper disposal of metal to the MS4 • Commercial, industrial, and institutional metal storage, handling, and loading/unloading activities at sites that drain to the MS4 • Seepage to the MS4 from metal laden ground water 	<p>Property Maintenance and Good Housekeeping</p> <ul style="list-style-type: none"> • Boise Stormwater Facility Inventory and Operation and Maintenance • Boise Parks and Recreation Integrated Pest Management (IPM), and Litter Collection <p>Education and Outreach (joint)</p> <ul style="list-style-type: none"> • Storm Drain Marking • Watershed Outreach • Household Hazardous Waste Collection • Recycling Program • Community Curriculum <p>Structural/Non-Structural</p> <ul style="list-style-type: none"> • Boise Drainage Design Standards • City Construction Site Erosion and Sediment Control <p>Illicit Discharge Detection and Elimination</p> <ul style="list-style-type: none"> • Stormwater Pollution Hotline and Complaint Notification and Response (participant) 	Yes	None

Pollutant	Known Controllable Sources	Potential Controllable Sources	Existing Controls	Adequacy of Controls	New Control Measures
			<ul style="list-style-type: none"> • Boise Stormwater Ordinance • Emergency Hazardous Material Spill Response (Boise Fire Department) 		

Attachment C. Proposed Joint Education and Outreach

Introduction

The Boise Municipal Separate Storm Sewer System (Boise MS4) National Pollutant Discharge Elimination System (NPDES) Permit (#IDS-02756-1) was issued by the United States Environmental Protection Agency (EPA) November 29, 2000. With a five-year permit cycle, this permit term will end in November 2005 and be administratively extended upon submittal of a complete and timely reapplication. It is anticipated that the next permit will be issued by the EPA to the Boise MS4 Co-Permittees (Co-Permittees) fall 2005 or later and will contain new information and requirements based on the Boise MS4 Stormwater Permit re-application. The Boise MS4 Co-Permittees include: Boise City, Garden City, Ada County Highway District (ACHD), Boise State University (BSU), Idaho Department of Transportation District 3 (ITD3), and Ada County Drainage District 3 (DD3).

Under the federal stormwater NPDES program the Co-Permittees are to develop and implement joint public education and outreach. This section of the Boise Stormwater NPDES Permit re-application proposes Best Management Practices (BMPs) to be implemented by the Co-Permittees to meet the joint public education and outreach stormwater NPDES permit requirements.

Boise City worked cooperatively with the other five Co-Permittees to identify a group of public education and outreach BMPs for implementation under the permit. These BMPs were selected based on the public education goal identified during development of the re-application and include those that best address the NPDES regulations, the local water quality conditions, the unique characteristics of the Boise City and Garden City areas, and the associated MS4 systems owned and operated by the Co-Permittees. In order to coordinate the implementation of the Boise Stormwater Management Program, the Co-Permittees signed an Intergovernmental Coordination Memorandum of Understanding (MOU) during the summer of 2001. This MOU identified ACHD as the lead agency for administration and joint water quality monitoring and Boise City as the lead agency for joint public education and outreach. Co-Permittee review of the current Boise SWMP in preparation of the re-application did not identify any changes to these roles. It is proposed that each Co-Permittee will share in the cost of implementing these joint public education and outreach BMPs as identified in a new MOU. It is expected that individual Co-Permittee participation and contribution levels will vary.

The overall goal of the joint education and outreach plan is to raise the level of awareness of the residents and small businesses about stormwater pollution – and motivate them to change or improve activities that can impact stormwater quality. The mission statement for the stormwater education and outreach program intends to reflect and further this overall goal:

The Partners for Clean Water¹ share a common goal to improve the water quality of all stormwater discharges. The Partner's education program strives to supply practical information on how to reduce pollutants to stormwater and create a conscious and responsible public that knows clean water is good for our environment, good for our community, and good for business.

The City of Boise proposes that the annual results and minor modifications of this proposed joint plan be included as a separate section of each annual report, and any individual education responsibilities identified in Section B of this re-application packet be included within each the Co-Permittees' annual reports.

Joint Public Education and Outreach Requirements

Existing Program/Activity Description

The following Education BMPs (Ed BMP) have been identified to meet the joint public education requirements. These were identified in the original Boise MS4 NPDES permit and, with some minor modifications, are proposed to be continued by this re-application package. A summary of the minor modifications are included in Table C1. The original permit language has been included for each of the joint education and outreach BMPs proposed. Please note that the proposed BMPs have been grouped into activities that may address more than one pollutant category or original permit condition.

Ed BMP 1: Storm Drain Marking

A.2. Floatables. The co-permittees shall ensure the establishment of a program to reduce the discharge of floatables (e.g., litter and other human-generated solid refuse).

a. Awareness and local authority cooperation. The co-permittees shall incorporate into their public education program information designed to reduce the amount of floatables which can end up in the storm sewer system.

A.11.a. Public Education Program. The co-permittees shall implement a program to inform the public of the impact of pollutants in storm water on waters of the United States and how to avoid adding such pollutants to storm water runoff. This public education program shall include the following activities:

¹ The "Partners for Clean Water" is the public education umbrella term for the Co-Permittees. The term is used here only in context to the public education and outreach BMPs proposed by the Co-Permittees. This term may change in the future.

Programs and activities to promote awareness of locations where the drain discharges and promote importance of maintaining clean water resources.

Storm drain marking is a volunteer based activity available to community groups, churches, schools and businesses. Marking drains with the message “Dump no waste-drains to river” serves as a visual reminder that what goes down the drain can impact stormwater quality. It involves people in the community, educates residents, and increases awareness about stormwater. The proposed storm drain marking BMP may include assembled and maintained marking kits (4” diameter markers or stencils), door hangers that explain the markers to nearby neighborhoods, volunteer solicitation and training, maps with storm drain locations, and recording activities and storm drains marked over time.

Ed BMP 1 Assessment Measure

Number and percent of storm drains within permit boundary with either markers or stencils.

Ed BMP 2: Watershed Outreach

A.2. Floatables. The co-permittees shall ensure the establishment of a program to reduce the discharge of floatables (e.g., litter and other human-generated solid refuse).

a. Awareness and local authority cooperation. The co-permittees shall incorporate into their public education program information designed to reduce the amount of floatables which can end up in the storm sewer system.

A.6. Pesticide, Herbicide, and Fertilizer Application. Co-permittees with jurisdiction over lands not directly owned by that entity (e.g., private lands within an incorporated city) shall implement controls such as educational activities...to reduce the discharge of pollutants related to application and distribution of pesticides, herbicides, and fertilizers by commercial and wholesale distributors and applicators.

c. Outreach Method Identification. Co-permittees shall identify and utilize outreach methods to educate homeowners and commercial businesses, such as greenhouses, nurseries, landscaping and yard-care businesses, on the impact of pesticides, herbicides, and fertilizers on aquatic resources and on the means to decrease their usage. Information should include the use of alternatives to commercial pesticides, as well as information on locally available methods for proper disposal of pesticides, herbicides and fertilizers after they have been used.

A.11.a. Public Education Program. The co-permittees shall implement a program to inform the public of the impact of pollutants in storm water on waters of the United States and how to avoid adding such pollutants to storm water runoff. This public education program shall include the following activities:

Promoting the collection and/or composting of yard wastes from residential and commercial sites. Co-permittees shall promote the “Keep watershed clean” campaign and shall distribute copies of flyers previously developed, including but not limited to, the Storm Water Ordinance (developed by the City of Boise), River Care Tips to Protect Water Quality (developed by the City of Boise), and the Storm Water Trooper bookmark (developed by the City of Boise);

Watershed outreach has included the “Partners for Clean Water” advertising (e.g., public service announcements, radio spots, bus bench ads, and Eddy the Trout appearances), web site (i.e., PartnersForCleanWater.org), education signs, community events (e.g., Earth Day celebrations, Boise River Sweep litter cleanup events, etc.), and exhibits developed to increase awareness about stormwater. These and similar activities are proposed for the watershed outreach BMP. Additional BMP elements may also include stickers, magnets, t-shirts, bookmarks, and brochures to help residents take local program contacts and resource information home to be used as reference.

Ed BMP 2 Assessment Measure

Number of residents exposed to stormwater program related information either through media or other public opportunities.

Ed BMP 3: Household Hazardous Waste

A.11.a. Public Education Program. The co-permittees shall implement a program to inform the public of the impact of pollutants in storm water on waters of the United States and how to avoid adding such pollutants to storm water runoff. This public education program shall include the following activities:

The distribution of public education flyers, inserts or booklets to householders regarding appropriate methods for disposing of used motor oil and similar substances.

The Household Hazardous Waste Program provides collection services for all Ada County residents. The Collection Program consists of Ada County’s permanent facility located at the Hidden Hollow Sanitary Landfill and city-sponsored mobile collection sites in Boise City and Garden City. The mobile

sites are open to residents within the limits of the respective cities, while all Ada County residents can use the facility at the landfill. Residents and some commercial customers (i.e., that generate conditionally exempt small amounts of hazardous wastes) may drop off unwanted hazardous materials (paint, fertilizer, household cleaners, etc.) that may otherwise end up in the storm drain. Outreach activities to be implemented under the proposed household hazardous water BMP may include community events, advertising, and partnerships with organizations and businesses to divert household hazardous waste for proper use and disposal.

Ed BMP 3 Assessment Measure

- Number of new and repeat residential (e.g., household) and business customers within the permit boundary.
- Amount and type of hazardous wastes collected (i.e., diverted from storm drains or solid waste disposal).

Ed BMP 4: Recycling

A.11.a. Public Education Program. The co-permittees shall implement a program to inform the public of the impact of pollutants in storm water on waters of the United States and how to avoid adding such pollutants to storm water runoff. This public education program shall include the following activities:

Promoting the collection and/or composting of yard wastes from residential and commercial sites. Co-permittees shall promote the "Keep watershed clean" campaign and shall distribute copies of flyers previously developed, including but not limited to, the Storm Water Ordinance (developed by the City of Boise), River Care Tips to Protect Water Quality (developed by the City of Boise), and the Storm Water Trooper bookmark (developed by the City of Boise);

Recycling is an important part of residential solid waste service in all of Ada County. The program provides an opportunity for residents to save money, resources, and space at the landfill by recycling: metal cans, plastic bottles (i.e., categories #1, 2, 3), newspapers, magazines and catalogs, mixed paper and cardboard, used motor oil, steel, aluminum cans, and appliances. Each year residents in Boise can also recycle Christmas trees and leaves. Residents who recycle receive a discount on their solid waste bill. Outreach activities to be implemented under the proposed recycling BMP may include community events, advertising, and partnerships with organizations and businesses to divert target materials (e.g., compost and recycled).

Ed BMP 4 Assessment Measure

- Number of residents within the permit boundary participating in the program.
- Volume of compost and pounds of recycled materials diverted from solid waste disposal.

Ed BMP 5: Community Curriculum

A.2. Floatables. The co-permittees shall ensure the establishment of a program to reduce the discharge of floatables (e.g., litter and other human-generated solid refuse).

a. Awareness and local authority cooperation. The co-permittees shall incorporate into their public education program information designed to reduce the amount of floatables which can end up in the storm sewer system.

A.6. Pesticide, Herbicide, and Fertilizer Application. Co-permittees with jurisdiction over lands not directly owned by that entity (e.g., private lands within an incorporated city) shall implement controls such as educational activities, permits, certifications, and other measures to reduce the discharge of pollutants related to application and distribution of pesticides, herbicides, and fertilizers by commercial and wholesale distributors and applicators.

c. Outreach Method Identification. Co-permittees shall identify and utilize outreach methods to educate homeowners and commercial businesses, such as greenhouses, nurseries, landscaping and yard-care businesses, on the impact of pesticides, herbicides, and fertilizers on aquatic resources and on the means to decrease their usage. Information should include the use of alternatives to commercial pesticides, as well as information on locally available methods for proper disposal of pesticides, herbicides and fertilizers after they have been used. Co-permittees may undertake this component of the storm water management plan as part of the overall public education component, identified in II.A.11.a.

A.11.a. Public Education Program. The co-permittees shall implement a program to inform the public of the impact of pollutants in storm water on waters of the United States and how to avoid adding such pollutants to storm water runoff. This public education program shall include the following activities:

Promoting the collection and/or composting of yard wastes from residential and commercial sites. Co-permittees shall promote the “Keep watershed clean” campaign and shall distribute copies of flyers previously developed, including but not limited to, the Storm Water Ordinance (developed by the City of Boise), River Care Tips to Protect Water Quality (developed by the City of Boise), and the Storm Water Trooper bookmark (developed by the City of Boise);

Co-permittees shall distribute the Storm Water Commercial and Industrial BMPs Handbook to commercial and industrial facilities identified as priorities due to the nature of the industrial and commercial activities to be found at such sites. Co-permittees shall make available the Storm Water Plant Materials - A Resource Guide to other facilities and make developers and contractors aware of the existence of such information;

Community curriculum promotes stormwater quality and storm drain protection by providing watershed education, information on proper management and disposal of hazardous materials, and soil and local water resource protection through composting and worm bins. The three main elements of community curriculum are (1) industrial and commercial facility non-stormwater disposal outreach; (2) training and certification for Integrated Pest Management (IPM); and, (3) the Enviroguard class curriculum and the statewide Water Awareness Week (WAW) education programs.

Industrial and commercial facility outreach includes information distribution on proper non-stormwater disposal BMPs. These typically occur during scheduled and unscheduled facility visits by the Boise City Pretreatment and Garden City Environmental staff.

A State of Idaho Department of Agriculture (IDA) certification program of integrated pest management (IPM) is implemented for local applicators. The IDA IPM training provides certification and recertification to local contract applicators.

Enviroguard and Water Awareness Week (WAW) classes are offered for teachers at various grade levels to compliment and expand their required courses. WAW occurs annually in the spring and focuses on water. Enviroguard classes are available year-round and cover a wide range of environmental topics including stormwater.

Ed BMP 5 Assessment Measure

Number of residents and students participating in the identified programs and classes within the permit boundary.

Ed BMP 6: Innovative Stormwater Management

A.6. Pesticide, Herbicide, and Fertilizer Application. Co-permittees with jurisdiction over lands not directly owned by that entity (e.g., private lands within an incorporated city) shall implement controls such as educational activities, permits, certifications, and other measures to reduce the discharge of pollutants related to application and distribution of pesticides, herbicides, and fertilizers by commercial and wholesale distributors and applicators.

Innovative stormwater management technologies for individual site and community development demonstrate cost effective strategies for our community. The Co-Permittees play an important role in bringing these technologies and training into our local community and conducting outreach within the professional design community, elected and appointed dignitaries, residents, and schools. Outreach activities to be implemented under the proposed innovative stormwater management BMP may include conferences, workshops, demonstration projects, interpretive signs, literature reviews, materials testing, and local planning efforts to encourage stormwater protection and re-use projects.

Ed BMP 6 Assessment Measure

Number and type of activities implemented to demonstrate innovative stormwater management technologies.

Proposed Changes for Second Permit Cycle

The Co-Permittees have identified some minor changes in the current joint education plan. These minor changes are summarized in Table A1. Future minor changes will be submitted to the IDEQ and EPA in the following year's annual report.

Table 1. Proposed Joint Public Education Plan Minor Modifications Summary Table

Proposed Joint Permit BMP Requirement	Proposed Assessment Measure	Existing Permit Section(s)	Existing Joint Permit Requirement	Existing Assessment Measure	Change in Permit Requirement	Change in Assessment Measure	Change Summary
Ed BMP 1: Storm Drain Marking	Number and percent of storm drains marked	Parts II.A.2.a and II.A.11.a(2)	Floatables Awareness and Storm Drain Stenciling	Number of storm drains marked	None	none	NA
Ed BMP 2: Watershed Outreach	Activity report and number of residents exposed	Parts II.A.2.a, II.A.6.c, and II.A.11.a(3)	Floatables; Pesticide, Herbicide, and Fertilizer; and Watershed Awareness	Activity report and number of printed material distributed	None	minor	Number exposed
Ed BMP 3: Household Hazardous Waste	Number participating, and amount and type of hazardous wastes collected	Part II.A.11.a(1)	Household Hazardous Waste Awareness	Number of printed material distributed and amount of used motor oil collected	None	minor	Number participating
Ed BMP 4: Recycling	Amount of yard wastes and other recycled materials collected	Part II.A.11.a(3)	Yard Waste Reduction and Composting	Amount of yard wastes collected	None	minor	Include summary of recycled materials collected

Proposed Joint Permit BMP Requirement	Proposed Assessment Measure	Existing Permit Section(s)	Existing Joint Permit Requirement	Existing Assessment Measure	Change in Permit Requirement	Change in Assessment Measure	Change Summary
Ed BMP 5: Community Curriculum	Activity report, number participating, and number of handbooks distributed	Parts II.A.2.a, II.A.6.c, II.A.11.a(3), and II.A.11a(4)	Floatables; Pesticide, Herbicide, and Fertilizer; and Stormwater Awareness	Activity report, number participating, and number of handbooks distributed	None	none	NA
Ed BMP 6: Innovative Stormwater Management	Activity report	Part II.A.6	Stormwater Plant Materials	Number and target audience plant material guides distributed	minor	minor	Low impact development practices and outreach

Attachment D. Monitoring Requirements Summary Tables

**Table D1
Proposed Changes to the NPDES Permit Storm Water Monitoring Requirements**

Component	Add	Delete	Modify	Retain	Comments
pH				X ¹	
Temperature				X	Potential TMDL ²
Dissolved oxygen			X		Analyze in grab, not composite
E. coli				X	TMDL
Biological oxygen demand (BOD5)				X	
Chemical oxygen demand (COD)				X	
Total suspended solids (TSS)				X	TMDL
Total dissolved solids (TDS)				X	
Hardness				X	Used to calculate metals criteria
Total phosphorus				X	TMDL
Orthophosphate				X	TMDL
Ammonia	X				State of Idaho instream criteria exist
Total Kjeldahl nitrogen (TKN)		X			No criteria; Remove from NPDES Permit, but analyze when sufficient sample available
Arsenic - Total		X			
Arsenic - Dissolved		X			Max detect below State of Idaho instream criteria
Cadmium - Total		X			
Cadmium - Dissolved			X		Max detect exceeds State of Idaho instream criteria; Request method flexibility
Copper - Total		X			
Copper - Dissolved			X		Max detect exceeds State of Idaho instream criteria; Request method flexibility
Lead - Total		X			
Lead - Dissolved		X			Max detect below State of Idaho instream CMC
Mercury - Total				X	
Mercury - Dissolved		X			Max detect below State of Idaho instream criteria
Nickel - Total		X			
Nickel - Dissolved		X			Max detect below State of Idaho instream criteria
Zinc - Total		X			
Zinc - Dissolved	X				Max detect above State of Idaho instream criteria; Request method flexibility
Oil & Grease				X	
Total recoverable petroleum hydrocarbons (TrPH) / n-hexane extractable material, SGT		X			If not deleted, use n-hexane extractable material, SGT
Volatile organic compounds (VOCs)			X		Request limited list
Base/neutral organics		X			Max detects since permit effective date below criteria
Acid organics		X			Max detects since permit effective date below criteria
Organochlorine pesticides		X			Max detects below criteria
Organophosphate pesticides		X			None detected
Pesticide organics		X			Duplicative requirement
Units for volume of discharge sampled			X		Measure/report in cubic feet, not gallons

Notes:

1. X = Propose this action for this component
2. TMDL = lower Boise River TMDL component

**Table D2a
Current NPDES Permit Sediment / Decant Water Monitoring Program**

Components	Water	Sediment
E. coli	X ¹	
Total suspended solids	X	
Total phosphorus	X	X
Orthophosphate	X	
Arsenic - Dissolved	X	
Arsenic - Total	X	X
Cadmium - Dissolved	X	
Cadmium - Total	X	X
Chromium - Dissolved	X	
Chromium - Total	X	X
Copper - Dissolved	X	
Copper - Total	X	X
Lead - Dissolved	X	
Lead - Total	X	X
Nickel - Dissolved	X	
Nickel - Total	X	X
Zinc - Dissolved	X	
Zinc - Total	X	X
Total recoverable petroleum hydrocarbons (TrPH) / n-hexane extractable material, SGT	X	X
Poly-aromatic hydrocarbons		X
Volatile organic compounds	X	X

Notes:

The current NPDES Permit does not specify which media should be analyzed for which components

1. X = This medium is analyzed for this component

**Table 2b
Proposed NPDES Permit Sediment / Decant Water Monitoring Requirements**

Component	Water	Sediment	Comments
E. Coli	R ¹		Worker safety issues
Total suspended solids	D ²		
Total phosphorus	R	D	TMDL pollutant
Orthophosphate	R		TMDL pollutant
Arsenic - Dissolved	D		
Arsenic - Total	R	R	POTW concerns; RCRA toxicity characteristic
Barium - Total		A ³	RCRA toxicity characteristic
Cadmium - Dissolved	D		
Cadmium - Total	R	R	POTW concerns; RCRA toxicity characteristic
Chromium - Dissolved	D		
Chromium - Total	R	R	POTW concerns; RCRA toxicity characteristic
Copper - Dissolved	D		
Copper - Total	R	D	POTW concerns
Lead - Dissolved	D		
Lead - Total	R	R	POTW concerns; RCRA toxicity characteristic
Mercury - Total		A	RCRA toxicity characteristic
Nickel - Dissolved	D		
Nickel - Total	R	D	POTW concerns
Selenium - Total		A	RCRA toxicity characteristic
Silver - Total		A	RCRA toxicity characteristic
Zinc - Dissolved	D		
Zinc - Total	R	D	POTW concerns
Oil & Grease	A		POTW concerns
Total recoverable petroleum hydrocarbons (TrPH) / n-hexane extractable material (SGT-HEM)	D	D	
Volatile organic compounds	M ⁴	M	Limited lists, based on components detected to date
Poly-aromatic hydrocarbons		M	Limited list, based on components detected to date

Notes:

1. R = Propose retaining this matrix/component combination
2. D = Propose deleting this matrix/component combination
3. A = Propose adding this matrix/component combination
4. M = Propose modifying this matrix/component combination