City of Garden City, Idaho

FY2019

Stormwater Management Plan

ACRONYMS

The following acronym list is provided as a comprehensive resource for those reading the Garden City Stormwater Management Plan.

ACHD	Ada County Highway District
AEP	Annual Erosion Permit
BMP	Best Management Practices
BLD	Building Permit
BOD	Biological Oxygen Demand (5 day)
CGP	Construction General Permit
CWA	Clean Water Act
eNOI	Electronic Notice of Intent (electronic filing system for EPA CGP)
EPA	Environmental Protection Agency
ERP	Enforcement Response Policy
ESC	Erosion and Sediment Control
ESCP	Erosion and Sediment Control Plan
GCC	Garden City Code
GEP	General Erosion Permit
IDEQ	Idaho Department of Environmental Quality
LID	Low Impact Development
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
MSGP	Multi-Sector General Permit; Industrial Stormwater Permit
NOI	Notice of Intent (EPA filing requirement for construction sites requiring CGP)

NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
PoC	Pollutants of Concern
RP	Responsible Person
STW	Stormwater Response Activity (database tracking code)
SWMP	Stormwater Management Plan
SWPPP	Stormwater Pollution Prevention Plan
TSS	Total Suspended Solids

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1. INTRODUCTION

1.1 Scope and Purpose:

Garden City's Stormwater Management Program (SWMP) is a comprehensive program plan designed to reduce the discharge of pollutants from the City of Garden City's Municipal Separate Storm Sewer System (MS4) to the Maximum Extent Practicable (MEP). The goal of the program is to restore and protect the quality of the Boise River and its tributaries. The SWMP includes control measures, Best Management Practices (BMPs), stormwater drainage system design, and engineering methods to control and minimize the discharge of pollutants from the MS4 system.

1.2 Applicability

Garden City is authorized with other Boise metropolitan area jurisdictions to discharge stormwater to the Boise River and its tributaries under the National Pollutant Discharge Elimination System (NPDES), in compliance with the Clean Water Act. In addition to Garden City, the NPDES permit IDS-027561 authorizes the following permittees to discharge from MS4 outfalls: Ada County Highway District, the City of Boise, Boise State University, Idaho Transportation Department District #3, and Drainage District #3. It includes next generation MS4 program requirements to be implemented incrementally. The current NPDES permit became effective on February 1, 2013 and expired on January 30, 2018. The permittees reapplied for permit reissuance on July 29, 2017. Reissuance is currently pending. (see Appendix H). The NPDES permit is provided in full at: http://www.epa.gov/region10/pdf/permits/npdes/id/ids027561-dp.pdf .

This program document describes the SWMP as prescribed by the permit including: the MS4 facilities and outfalls, the control measures and program activities implemented to reduce the discharge of pollutants to the Boise River, related ordinances and regulatory controls, and the City's participation and cooperation with other jurisdictions under the permit to ensure compliance with the conditions of the permit. Garden City's roles and responsibilities under the municipal stormwater permit have been established in **Intergovernmental Agreements**

between the permittees. (Appendix A) These agreements have been updated, fulfilling the requirements in Part II.B.3.a.iii of the NPDES permit.

1.3 Program Administration and Annual SWMP Documentation Update

The SWMP is administered by the City's Environmental Division under the direction and management of the Environmental Manager, with oversight from the Public Works Director and cooperation from Development Services, and the City Engineer to help ensure that NPDES permit requirements are satisfied. Garden City's SWMP is evaluated and updated annually and the revised SWMP documentation is included in the Annual Stormwater Report that is submitted to the EPA and IDEQ for review.

2. PHYSICAL DESCRIPTION of GARDEN CITY'S MS4

Garden City is located in the Lower Boise River Watershed (Hydraulic Unit Code 17050114) in southwest Idaho. According to the United States 2010 Census Bureau, the City serves a population of 10,972 people. Garden City limits are within the Boise metro area in Ada County, with the City's eastern boundary at West Main Street in Boise and the western boundary at Horseshoe Bend Road near Eagle. The southern boundary and northern boundary parallels Chinden Boulevard and the Boise River/State Street respectively.

2.1 ACHD MS4 in Garden City

All MS4 structures, facilities and outfalls draining public streets and roadways in Garden City are owned and operated by the Ada County Highway District (ACHD). ACHD is responsible for management, maintenance, and monitoring of the MS4; Garden City is responsible for limiting the discharge of pollutants to the portion of the MS4 within Garden City limits. The SWMP control measures designed to accomplish this goal to the Maximum Extent Practicable (MEP) are discussed in *Section 3- Minimum Control Measures*. As noted in the Introduction, an **Intergovernmental Agreement and Operating Guidelines** (Appendix A) have been drafted with ACHD and other permittees to establish the roles and responsibilities of each entity under the NPDES Municipal Stormwater Permit.

These responsibilities are further defined in the document titled “Interagency Agreement for the Inspection, Monitoring and Enforcement of Industrial & Commercial High Risk Runoff”. This document, which is an agreement between ACHD and Garden City, also included in Appendix A.

2.2 Garden City MS4

During FY 2015, the City disconnected all City owned and operated MS4 outfalls and now retains all stormwater onsite in newly constructed stormwater structure and controls. Please refer to *section 3.2.7 Outfall Disconnection* for details.

Garden City owns and operates various facilities and parks which have onsite retention and permanent stormwater controls. These facilities are limited in their pollutant loading potential to the MS4 owned by the ACHD and are not connected to any outfalls to the Boise River. All City properties and structures are inspected annually to check for any maintenance that is needed and also to evaluate the potential for discharge of pollutants to the MS4. An inventory of facilities owned by the City and related management and maintenance activities are described in detail in SWMP *section* 3.5 *Stormwater Infrastructure and Street Management*.

3. SWMP Minimum Control Measures

This section describes the six minimum control measures that must be accomplished by Garden City’s SWMP according to the NPDES permit Part II.B. The six minimum control measures are:

1. Construction Site Runoff Control Program
2. Stormwater Management For Areas of New Development and Redevelopment
3. Industrial and Commercial Stormwater Discharge Management
4. Illicit Discharge Management
5. Stormwater Infrastructure and Street Management
6. Education, Outreach and Public Involvement

For each required control measure, a description of existing activities that meet permit requirements is provided as well as schedule of implementations to be completed.

3.1 Construction Site Runoff Control Program

Garden City has implemented a designated program to reduce discharges of pollutants from public and private construction activity within City limits. The program is known as Erosion and Sediment Control (ESC) and it is the means to enforcing Garden City Code **Title 4-15 Construction Site Erosion Control Ordinance** (Ord. 9-28-2002) (Appendix B). In general, all non-emergency construction activity involving greater than 2 cubic yards of excavation is required to comply with the conditions of the ordinance.

In order to meet the NPDES requirement, a Public Advisory Group (PAG) was formed consisting of professionals representing stakeholders from City of Boise, Garden City, ACHD along with local civil engineering and construction firms. In a series of workshops, the existing ordinances were analyzed, discussed, compared with the CGP and modified to be consistent with the NPDES permit and the current CGP.

Garden City staff utilized the PAG process and the approved Boise City Ordinance revisions as a basis for recommended changes in Garden City code designed to facilitate NPDES permit compliance.

On August 4, 2015 Council passed a motion to adopt and publish **ordinance 979-15** (Appendix B) with the noted amendments to Chapter 15, Title 4 that incorporated the recommended changes. A summary of the ordinance was published in the Idaho Statesman Newspaper on August 11, 2015.

3.1.1 Plan Reviews, Site Inspections, and Enforcement Response Guide

The procedures followed by the Environmental Division to control and monitor stormwater runoff from construction sites are detailed in Garden City Public Works Department Environmental Policy and Procedure **8.11 Construction Site Erosion and Runoff.** The guide is located in Appendix C.

To ensure the program is effective and in compliance with NPDES permit requirements, Garden City's ESC program also includes the following components:

3.1.2 Training and Education

- *Construction Site Operators:* Each erosion control permit applicant or their appointee is required to have participated in the Boise City Erosion and Sediment Control Training program or have equivalent approved training. Information regarding the Boise training program can be found at: http://pds.cityofboise.org/building/bld/erosion/certification/

  The training program offers two certifications which include Responsible Person (RP) training and Plan Designer (PD) training. For all construction projects requiring an erosion control permit, a certified RP must be the designated site contact for all ESC related matters during construction and is trained in implementing erosion control BMPs. A certified PD must design and sign the ESCP, if a site specific plan is required to be submitted based on site characteristics and sensitivity. Recertification for both training courses must be completed every 3 years. Certification verification is accomplished during the application and plan review process.

- *ESC/ stormwater inspectors; plan reviewers:* Garden City Environmental Division employees are required to receive initial plan review training and the RP training mentioned above regarding proper control measure selection, installation and maintenance. Annual training is provided by attending EPA and IDEQ conferences, training workshops, and cross-training with ACHD and City of Boise ESC inspectors.

3.1.3 Manuals for Construction Stormwater Management Controls & Specifications

Construction operators enrolled in RP training receive educational guidance manuals upon completion of the class. In addition to the detailed course notes and information provided during the class, RPs are provided with a hardcopy of Idaho Construction Site Erosion and Sediment Control Field Guide. The basis of the field guide is the Catalog of Stormwater Best Management Practices for Idaho Cities and Counties, September 2005, a full version of which can be found on the IDEQ website: http://www.deq.idaho.gov/media/622263-Stormwater.pdf

In addition to the materials provided in the RP training class, construction operators and building permit applicants are provided with the handout **8.11.0 Erosion and Sediment Control (ESC) General Requirements** (Appendix D), the EPA pamphlet "How Do I Get Stormwater Permit Coverage for my Construction Site", and may contact the Environmental Division for any specific questions pertaining to stormwater issues at their construction site.

3.1.4 Construction General Permit (CGP) Advising and Referrals

When plans are submitted for construction sites that disturb 1 or more acres, including smaller sites that are part of a larger plan of development, the applicant is informed of their need to obtain CGP stormwater coverage. If a site is eligible for coverage and the plan review has been conducted, the plan review report provided to the operator/applicant explicitly states "NOTICE: You are required by the Federal Government to file a Notice of Intent (NOI) with the EPA to obtain a Construction General Permit (CGP) for this project." When a person signs the application for an AEP or GEP they certify they agree to conform to the general conditions, which are provided for review at the time of permit issuance. These conditions are listed in the document **8.11.0 Erosion and Sediment Control General Requirements** (Appendix C) and include a requirement to file an NOI if applicable.

If necessary, Garden City may provide the EPA NPDES Compliance Hotline (206) 553-1846 with information regarding construction project operators who do not have appropriate coverage under the NPDES Construction General Permit. Garden City

Environmental Division staff routinely search the EPA's eNOI database for valid CGP coverage.

3.1.5 Tracking and Reporting:

All ESC program activity is tracked and documented and stored electronically using tracking and reporting software. The software is used to track and store related documents, plans, and inspection pictures for a particular construction site from the beginning of the application process to the completion of construction. For a construction site that requires an AEP or GEP, the database tracks the following:

1) Building Permit – shows status of building permit and contact information of the contractor/applicant.

2) Annual Erosion Permit (AEP) or General Erosion Permit (GEP) for construction sites that qualify & contact information on the Responsible Person and their ESC training certification ID number.

3) Activity tracking – Stores reports/documentation of the following ESC program activities:

- *ESC plan review*
- *Site preparation inspection*
- *Routine inspections/observations conducted during construction*
- *Enforcement actions (if necessary)*
- *Final ESC inspection*

For each activity that is tracked, the software can generate a plan review or inspection report complete with pictures and other information that can be stored on the City's server network. The inspection reports can be emailed to the RP. The database can be used to schedule routine inspections in advance based on the inspection prioritization program or if an inspection has been requested by the applicant, such as the site preparation inspection and final ESC inspection.

3.1.6 Program Evaluation and Compliance Assessment

At the end of each permit year, the tracking data is used to compile an annual report which lists the number of ESC permits issued, plan reviews and inspections completed, and also enforcement actions taken for non-compliant sites. The individual reports for each action in the tracking data are included in the Annual Stormwater Report to provide detailed information of each activity. The tracking data and reports are used to document and assess Garden City's compliance with the NPDES permit requirements for construction site runoff control. The information is also used to evaluate the effectiveness of the program, allocate time and resources appropriately, and make revisions to improve the program. Annual statistics show trends in the amount of construction activity in the City and if there has been an increase or decrease in the number of corrective/enforcement actions issued to contractors over time.

3.2 Stormwater Management for Areas of New Development and Redevelopment

New development and redevelopment in Garden City is required by city ordinance to be designed to manage stormwater runoff and shall include permanent controls to protect water quality and restrict discharges to surface waters or the MS4. In general, the rate of stormwater runoff from any proposed land development shall not exceed the runoff rate prior to the development regardless of the storm event evaluated. Stormwater should be retained onsite and percolate back into the ground.

3.2.1 Ordinance and Stormwater Design Criteria Model

For guidance in BMPs for design of drainage facilities, Garden City **Code 4-14 Stormwater Management and Discharge Control Ordinance** (Ord. 786, 5-16-2002) (Appendix B) refers to the **City of Boise Stormwater Design Manual**. This manual, which was revised in September 2015, sets forth standards for drainage system design, treatment facilities, maintenance, and operation. The Garden City ordinance and design manual are available online at:

- Applicable City Code: http://www.codepublishing.com/ID/GardenCity/
  - § 4-14-6: Compliance with BMPs – references the stormwater design manual
  - § 4-14-14: New Development and Redevelopment – runoff reduction
  - § 4-14-16: Authority to Inspect
  - § 4-14-24: Administrative Enforcement Powers
  - §8-4G: Sustainable Development Provisions – low impact development techniques
- City of Boise Stormwater Design Manual: http://www.partnersforcleanwater.org/outreach/engineersdesigners/

In order to meet the NPDES requirement, a Public Advisory Group (PAG) was formed consisting of professionals representing stakeholders from City of Boise and Garden City along with local civil engineering and construction firms. In a series of workshops, these manuals were updated to meet the current NPDES and CGP requirements. Any revisions to these manuals are automatically adopted as per Garden City Code which states:

- **4-14-6 COMPLIANCE WITH BMPs**: Where BMP requirements have been promulgated by any federal, state of Idaho, regional, city, county and/or local entity, for any activity, operation, or facility which may cause or contribute to storm water pollution and/or illicit discharges to the storm water system, every person undertaking such activity or operation, or owning or operating such facility shall comply with such requirements. All physical development or redevelopment activities shall refer to the most current **Boise City "Storm Water Management Design Manual"** for guidance in the best management practices for design of drainage facilities to provide flood control, water quality improvement, and visual appeal.

3.2.2 Building Permit Application and Drainage System Plan Review Process:

The implementation of stormwater management for areas of new development and redevelopment begins during the building permit application, pre-construction plan review and approval process. If a proposed project meets one or more of the conditions listed below, a drainage report and detailed drainage plan must be prepared and stamped by a qualified Idaho licensed professional and submitted with the building application for review:

- Industrial, commercial, institutional, multi-family residential and subdivision developments.
- The project disturbs land in a manner that may contribute to increased stormwater runoff from the site.
- The existing stormwater drainage design will be modified during redevelopment.
- The project has potential for excessive pollutant loadings that would require water quality treatment or controls/procedures to prevent pollution of stormwater runoff. Plans for permanent controls and treatment must be included.

The Environmental Manager conducts an initial review of the submitted drainage plans to check for compliance with the standards set forth in the **Stormwater Design Manual** and City ordinance. To ensure the review of the plans is complete, the **Stormwater Management Checklist** (Appendix D) may be used. In certain cases the Environmental Manager will request revisions or more detailed information before approving the plans. A second and final review of the plans is conducted by the City Engineer. The City Engineer evaluates the stormwater design for both surface and subsurface management using the criteria of the design manual and reviews some of the more technical aspects of the plans. The engineer's final approval is required for the applicant to obtain the building permit.

The drainage plan reviews conducted by the Environmental Manager and the City Engineer are documented in the Public Works database. The plan review report is then provided to the applicant with corrections if necessary. Once drainage plans have been approved at both levels the applicant may continue with the process of acquiring their building permit.

To assist developers and contractors with compliance, prior to submitting finalized applications and pre-construction plans, prospective developers are given the opportunity to hold a pre-application conference with the Environmental Manager in attendance. At this time the applicant is provided with information regarding the City's Erosion & Sediment Control requirements, stormwater management ordinance and the standards of the stormwater design manual as applicable to their project. The pre-application conference not only prevents the applicant from submitting multiple deficient plans, it is also an effective method of educating developers on permanent stormwater control as well as low impact development provisions.

3.2.3 Drainage System Construction Inspections and Permanent Control Tracking and Inventory

Developments with stormwater designs that require permanent controls are tracked and designated for inspection. Based on information gathered during the plan review process, permanent controls to be installed are included in a **Stormwater Management Inventory Tracking Spreadsheet** (Appendix E) of existing permanent stormwater controls within Garden City limits. During construction, project sites are inspected for proper installation of the drainage system as specified in the approved plans by the design professional of record. For drainage structures that require excavation, an inspection must be conducted prior to fill material being placed over it. Once final paving and landscaping has been completed, a final observation of the drainage system is conducted by City staff to check for compliance. The design professional of record must provide signed, stamped written documentation that it was constructed according to the specifications in the approved plan. Information regarding the required inspections is provided to the building applicant during the plan review phase.

Drainage system design inspections and reports are tracked and stored electronically in the Public Works database. Inspections conducted during construction activity are stored in the file that tracks all required inspections and approvals needed for a development to receive their final Certificate of Occupancy. This tracking mechanism ensures that

required drainage inspections are performed and permanent controls are installed properly.

Post-construction, the permanent control inventory developed is used to help identify and prioritize stormwater inspection targets for the Industrial and Commercial Stormwater Discharge Management program (see Section 3.3). Residential subdivision developments with new permanent controls are also included in the inventory. The inventory satisfies the NPDES permit requirement (Part II.B.2.e) to develop an inventory of all new permanent stormwater controls installed after February 1, 2013. Currently the inventory includes a reference to a GIS shape file, which will be included in the ongoing update of the City's GIS map and database.

3.2.4 Operation and Maintenance Plans and Inspection of Permanent Controls

To ensure that newly developed stormwater design systems and permanent controls are operated and maintained adequately, the applicant is required to provide an operating and maintenance (O&M) plan for the stormwater design system. The O&M plan is submitted with the required drainage plan and includes the entity or party responsible for long term maintenance, a list of pollution prevention source controls, how the stormwater system operates, an inspection and maintenance schedule, and system failure and replacement criteria.

The information provided in the O&M plan is stored in the inventory of permanent stormwater controls mentioned above, and is also stored in the Public Works database under system owner's name in a stormwater specific file for the facility. This stormwater file is created in the database at the time the development receives its Certificate of Occupancy and the facility is included in the existing Industrial and Commercial Stormwater Discharge Management inspection program. All reports and actions resulting from routine inspections conducted by the Environmental Division are stored in the database in the stormwater file for the site. This documentation creates a historical record regarding the management of stormwater and maintenance of permanent controls at the site. If sanctions (including fines) are needed to ensure compliance, the

Environmental Division follows the **Public Works Fee Schedule - Environmental Fine and Cost Recovery Schedule** (Appendix C).

The inventory of permanent controls and information gathered during routine inspections of facilities will be used to designate high priority locations based on the controls installed and the industrial or commercial use at the site. High priority locations require increased inspection frequency and may have specific inspection requirements which will be provided for in an inspection checklist. Further information on this program element is provided in section 3.3 - Industrial and Commercial Stormwater Discharge Management.

3.2.5 Sustainable/Low Impact Development Incentive Strategy

Garden City has included sustainable development provisions in the **Design and Development Requirements chapter of Title 8 Development Code** (GCC §8-4G, Ord. 905-09, 3-23-2009). These provisions promote green infrastructure and low impact development (LID) techniques that will contribute to the sustainability of the City. New developments and redevelopments are required to provide LID practices based on a point system. During the building permit application process, plans are reviewed by Development Services to assess whether the project has met the sustainability point quota based on the size of the development. Within the point system is a section dedicated to improving water quality (**GCC §8-4G-3.E**) and reducing stormwater discharges from the project, excerpts of this code can be found in Appendix B. The following practices can be implemented to meet point requirements:

- Alternative surfaces and nonstructural techniques used to reduce imperviousness and promote infiltration thereby reducing pollutant loadings. Practices include vegetated roofs, pervious pavement, and vegetated swales.
- Stormwater generated from the site is reused for non-potable uses such as irrigation and toilet flushing
- Stormwater infiltration and retention system provided on site
- Vegetated open space areas equal to the building footprint

3.2.6 Riparian Zone Management Plan

In order to meet the NPDES requirement, the City of Garden City has developed a **Riparian Zone Management Plan** (Appendix F). The project would attempt to acquire and protect undeveloped areas of land in the riparian areas within the city limits of Garden City. The project includes mapping out the current city owned properties, and potential riparian area acquirable lands, and outlining the benefits to land owners and the necessary steps to acquiring and protecting the land.

3.2.7 Outfall Disconnection

Separate from the ACHD MS4, Garden City owned and operated 3 MS4 outfalls at the Garden City Hall complex on the corner of Glenwood and Marigold adjacent to the Boise River. The stormwater facilities drained and treated stormwater that came into contact with the impervious surfaces including the parking lot and Riverpointe Drive, a City-owned roadway that provides access to City Hall and the surrounding residential area. During FY 2015, the City disconnected these outfalls and now retains all stormwater onsite in newly constructed stormwater structure and controls.

All storm drainage from Garden City Hall complex, Riverpointe Drive and a portion of the Townhouse development to the West of River Point Drive is retained in two shallow storage/infiltration basins located in the grassy area of the Garden City Hall. Stormwater from the site flows overland to the drop inlets, through sand and grease traps and into the horizontal sand filters. Small storm flows are infiltrated in the sand filters. Larger flows fill the sand filters and bubble up into the shallow storage/infiltration basins where the water quality storm of 0.6 inches in 60 minutes will be retained. During and after the storm, water is infiltrated through the horizontal sand filter and the bottom of the storage basin. Infiltration rates of 8 in/hr are expected for the sand filters and 1 in/hr for the basin area.

Based on the language in the permit, this approach meets the NPDES requirements for outfall disconnection. This project also meets the requirements in II.B.4.g of the NPDES

Permit as this was the only City owned site deemed feasible to retrofit. In addition, we believe the City's approach aligns well with the recommendations from the 2009 NRC Report.

3.2.8 Training and Education

Garden City works together with all Boise area NPDES permittees as a member of Partners for Clean Water to provide stormwater management education and training opportunities to regional developers and appropriate audiences. The City of Boise is the lead agency for public education and outreach. Garden City helps by providing funding and planning support for program activities. Among the various outreach activities are annual training conferences regarding permanent stormwater controls and LID techniques. In addition to Boise's outreach program, the Garden City Environmental Division uses the pre-application meetings, drainage design reviews, onsite inspections and distributes educational materials to interact with and educate developers, business owners, and facility managers on the proper management of stormwater runoff and maintenance of permanent controls.

Garden City Environmental Division staff attends and participates in all stormwater management training events provided by the City of Boise, the IDEQ, and EPA when offered locally. The training curriculum typically covers stormwater design, drainage plan review, and inspection procedures to determine the adequacy of stormwater management practices and treatment controls at new and existing Garden City developments.

3.3 Industrial and Commercial Stormwater Discharge Management

All industrial and commercial operations within Garden City's jurisdiction are tracked and inspected for the purpose of reducing the discharge of pollutants to the Maximum Extent Practicable (MEP). The Environmental Division maintains an inventory of all businesses and facilities in Garden City in the Public Works Database. The City's **Stormwater Management**

and Discharge Control Ordinance, Chapter 4-14 (Appendix B) gives the City the authority to regulate stormwater runoff quality from private industrial and commercial facilities.

- Applicable City Code:
  http://www.codepublishing.com/ID/GardenCity/
  - § 4-14-5: Discharge of Pollutants – prohibits non-stormwater discharges
  - § 4-14-10: Reduction of Pollutants in Stormwater
  - § 4-14-12: Outdoor Storage Areas; Commercial and Industrial Facilities
  - § 4-14-16: Authority to Inspect
  - § 4-14-24: Administrative Enforcement Powers

3.3.1 General Stormwater Inspection Program

The industrial and commercial stormwater inspection program is implemented concurrently with Garden City's Industrial Pretreatment Program for all Industrial Users of the sanitary sewer. In any instance in which a pretreatment inspection or observation is performed, a stormwater inspection is also conducted at that time. Depending on the size and complexity of stormwater management at a facility, the **General Stormwater System Inspection Form** can be used by the inspector (Appendix D). Major elements of the stormwater inspection include the following:

- ✓ Maintenance and condition of permanent stormwater control structures
- ✓ Observation of drainage system design and cleanliness of impervious surfaces
- ✓ Check for pollutant sources such as leaking trash containers, fueling stations, and rooftop pollutants
- ✓ Evaluate outdoor activities and stormwater BMPS that are implemented
- ✓ Observe outdoor storage practices; check secondary containment structures
- ✓ Look for any non-stormwater discharges
- ✓ Assess general compliance with stormwater regulations
- ✓ Provide education and outreach through discussion and educational handouts
- ✓ Issue enforcement actions or compliance requests to ensure compliance

In the rare instance that a facility has a potential for stormwater discharges but does not have a connection to the City sewer, these facilities are tracked solely in the stormwater inventory and inspected accordingly. For low priority operations and

businesses, the Environmental Division has the goal of conducting inspections at least once every two years.

All inspection reports and completed inspection forms are stored electronically in the Public Works Database under the business name and facility address in a stormwater specific file. The reports and inspection forms are also stored in a physical filing system located in the Environmental Division office, which is organized into separate folders for each facility for easy review of stormwater management at that facility. Each year, the number of stormwater inspections conducted and any enforcement actions undertake to ensure compliance is provided in the Annual Stormwater Report. Additionally, the database is used to build and update the inventory of all industrial and commercial activities in Garden City.

3.3.2 High Risk Stormwater Inspection Program

For new and existing industrial and commercial operations that have been identified as "high risk" sites due to the commercial or industrial activities at the site, a separate high risk stormwater inspection program has been established. This program also applies to operations required to be covered by a Multi-Sector General Industrial Stormwater Permit (MSGP). In cooperation with ACHD, Garden City has compiled an inventory of high risk inspection sites that are prioritized to be inspected annually for compliance. The high priority inspections typically involve more detail including a facility stormwater management map. To help ensure the inspection is thorough, the Garden City inspector uses a stormwater inspection checklist provided by ACHD (Appendix D**: ACHD Industrial Stormwater Checklist**).

All priority inspections and enforcement activities conducted are recorded and reported upon in the Public Works database and submitted as separate data in the Annual Stormwater Report. Additionally, a separate listing of priority facilities inspected that are subject to MSGP who have not yet filed an NOI with the EPA is provided for the annual report. Each year, Garden City and ACHD evaluates the existing inventory and updates accordingly to include new priority sites.

Garden City is a well known business center for vehicle, RV, and boat dealerships and many of these businesses have the need to routinely rinse and clean their inventory that is on display outdoors. In addition to vehicle dealerships, it was also noticed that many businesses were unfamiliar with surface and outdoor cleaning activities. To complement the industrial and commercial stormwater discharge management program, the Garden City Environmental Division has developed specific policies and procedures (see Appendix C) to address non-stormwater discharge management for the following:

- Vehicle, boat, RV, and equipment dealerships:
  8.5 Commercial Industrial Vehicle, Boat, Recreational Vehicle (RV) and Equipment Cleaning Enforcement Policy and Procedure

- Mobile and Surface Cleaning Operations:
  9.6 Mobile and Surface Cleaning Control Practices Enforcement Policy & Procedure

- Outdoor cleaning activities:
  8.9 Garden City Non-Stormwater Disposal Best Management Practices

3.3.3 Inspection and Enforcement of High Priority Permanent Stormwater Management Controls

As required in II.B.2.f of the NPDES permit, the City has implemented an inspection program defining and prioritizing new development and redevelopment sites for inspections and enforcement of permanent storm water management controls. **(Appendix C "8.14 Inspection and Enforcement of Permanent Storm Water Management Controls")** All high priority locations are inventoried and associated inspections are scheduled to occur once annually. The City has developed a checklist to be used by inspectors during these inspections, and maintains records of all inspections conducted. **(Appendix D "High Priority Permanent Storm Water Management Site Inspection Checklist")**

3.3.4 Enforcement Actions

If violations of the City's stormwater ordinance or a failure to implement necessary BMPs to protect stormwater are observed during routine and priority stormwater inspections, the Environmental Division uses the enforcement schedule provided in **Utility Billing Policy - #13 Environmental Fine and Cost Recovery Schedule** (Appendix C) to ensure compliance. If a Notice of Violation (NOV) or Compliance Request is issued, follow up inspections are conducted as necessary to verify that compliance has been accomplished by the facility within a given compliance date. As noted previously all enforcement actions and follow up inspections and the outcomes are documented and reported upon in the Annual Stormwater Report.

3.3.5 Education and Outreach

An important component of the Industrial and Commercial Stormwater Discharge Management inspection program is education and outreach that is conducted at the time of the inspection. During inspection visits, facility managers and operators are provided guidance in implementing stormwater BMPs and an explanation of stormwater regulations and their purpose. For further guidance, the Environmental Division supplies one or more of the following pertinent educational materials such as:

- Excerpts from the **Catalog of Stormwater Best Management Practices for Idaho Cities and Counties, September 2005** http://www.deq.idaho.gov/media/622263-Stormwater.pdf
- **Boise City Non-Stormwater Disposal Best Management Practices (see Appendix C-7)** http://publicworks.cityofboise.org/media/219227/22375_StormwaterNon-stwaterDisposalBMPGuidebook.pdf
- Garden City Stormwater Ordinance Brochure
- Excerpts from Garden City Ordinance **4-14 Stormwater Management and Discharge Control**

3.4 Illicit Discharge Management

As defined in the Garden City Stormwater Management and Discharge Control Ordinance, an illicit discharge is any discharge that is not composed entirely of stormwater. Illicit discharges are prohibited in Garden City and during commercial and industrial stormwater inspections any illicit discharges or activities with the potential for illicit discharges are addressed accordingly and prohibited. In addition to routine stormwater inspections, illicit discharge surveillance is conducted by Environmental Division while traveling through the City. All other Public Works staff has been alerted to contact the Environmental Division when they suspect an illicit discharge to an MS4.

3.4.1 Inspections and Enforcement Actions

As with the other elements of Garden City's Stormwater Management Program, Garden City **Code § 4-14 Stormwater Management and Discharge Control ordinance** (Appendix B) gives the City the authority to prohibit non-stormwater discharges to the MS4 through inspection activities and enforcement actions. Garden City Code § 4-14 allows for discharges from qualifying activities to not be considered a source of pollutants to waters of the state or U.S. when properly managed, but in general all non-stormwater discharges are considered illicit, and in particular non-stormwater discharges resulting from daily industrial or commercial activities. Should illicit discharges be observed, the Environmental Division shall reference **Utility Billing Policy - #13 Environmental Fine and Cost Recovery Schedule** (Appendix C) to ensure compliance.

3.4.2 Applicable City Code

Garden City Code Title **4-14 Stormwater Management and Discharge Control Ordinance** (Appendix B) has many provisions that allow the Environmental Division to define an illicit discharge and to take reactive and preventive measures to stop illicit discharges to the MS4. The sections of code that apply directly to Illicit Discharge Management are listed below.

Website: http://www.codepublishing.com/ID/GardenCity/

- § 4-14-3: Definitions – defines an illicit discharge
- § 4-14-5: Discharge of Pollutants – prohibits non-stormwater discharges
- § 4-14-6: Compliance with BMPs – requires BMPs be implemented to properly dispose of non-stormwater discharges
- § 4-14-7: Notification of Spills
- § 4-14-8: Discharge in violation of permit – any discharge that is a violation of the NPDES permit is also a violation of City code
- § 4-14-9: Illicit Connections – prohibits illicit drainage connections to the MS4
- § 4-14-12: Outdoor Storage Areas; Commercial and Industrial Facilities – illicit discharge and spill prevention/containment system requirements
- § 4-14-16: Authority to Inspect
- § 4-14-24: Administrative Enforcement Powers

3.4.3 Stormwater Pollution Hotline and Complaint Response Program

In cooperation with the other permittees and regional regulating entities, Garden City participates in the Stormwater Pollution Hotline program that has been established to allow citizens to call in illicit discharges or spills to the MS4 in the greater Boise area. The hotline number, (208) 395-8888, is provided on stormwater educational handouts, can be reached via an operator or Ada County Dispatch, and is also provided on the websites for Garden City, Boise, ACHD, and the IDEQ. Garden City Environmental staff may also receive complaints or reports directly by listing contact information on the City website. Additionally, during stormwater and industrial pretreatment inspections, the inspector always provides a business card with contact information and encourages community members to contact the Environmental Division if any illicit discharges, spills, or other conditions which may represent a pollutant source are observed.

Garden City Environmental Division responds to and investigates all complaints or reports of illicit discharges regardless of how the information was received. Typically illicit discharge complaints are responded to immediately or as soon as possible within 2 working days of receiving the complaint. When a complaint is investigated and it is indeed an illicit discharge, the complaint, field investigation report, and location of the incident are stored in the Public Works Database. Any follow-up inspection or compliance

verification activity performed is also logged in the same file to provide documentation of how the illicit discharge has been mitigated or resolved.

At the end of each year a report is generated from the data base to list all Stormwater Response investigations, corrective/enforcement actions taken, and the location of the incident. Using this data, an inventory and map can be created to provide a record of illicit discharges or illicit connections to identify priority areas requiring increased surveillance and/or inspections.

3.4.4 Spill Response and Spill Prevention

Garden City has established Public Works Policy **8.2 Accidental Spill Response Policy & Procedure** (Appendix C) to provide guidance in appropriately and safely responding to hazardous and non-hazardous spills. Illicit Discharge and spill training for inspectors, field staff, and code enforcement officers will be provided annually utilizing this policy and procedure in order to comply with NPDES permit requirements. Reporting requirements and contact numbers are included in the procedure. If the spill is a known non-hazardous or non-toxic substance, the Garden City Environmental Division will take steps to prevent the spill from entering the MS4 using absorbent spill tubes and mats, floor dry, and any other appropriate means. The agency responsible for spill cleanup will be notified immediately.

If the spill is an unknown material or hazardous material, Garden City Environmental will immediately contact 911, State Com (208) 846-7610, and other responsible agencies to report the spill. Garden City Environmental Staff has received training in Hazard Communication and is familiar with the USDOT Emergency Response Guidebook to effectively identify hazards to adequately report spill conditions to hazardous spill responders. The Ada County Hazardous Materials/Radiological Incident Contingency Plan is the cooperative agreement that identifies the roles and responsibilities for hazardous spill response in Ada County.

To prevent spills from occurring Garden City has the authority to require spill containment systems for outdoor storage facilities as provided in the stormwater

ordinance **§4-14-12: Outdoor Storage Areas; Commercial and Industrial Facilities**. During stormwater inspections the Environmental Division will assess outdoor storage practices and implemented BMPs to determine if a spill containment structure is required to mitigate the risk of accidental spills/illicit discharges to the MS4. Additionally during stormwater inspections of facilities that generate waste oil or other toxic/hazardous wastes, disposal methods and documentation of disposal are reviewed. Information regarding Ada County's Household Hazardous Waste Facility and the Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste disposal program for small businesses is provided.

GIS software is used to develop a map of reported and documented illicit discharges that will be updated annually.

3.4.5 Dry Weather Outfall Screening

ACHD has implemented a Dry Weather Outfall Screening (DWOS) Plan. The DWOS plan provides guidance for field reconnaissance activities, monitoring, and recordkeeping efforts performed by ACHD. The outfall at Garden City Hall has been disconnected, therefore the City of Garden City does not own or operate any stormwater outfalls and the DWOS Plan is not applicable.

3.5 Stormwater Infrastructure and Street Management

Garden City manages its stormwater infrastructure and facilities to reduce the discharge of pollutants to the MEP. Management includes an inspection of permanent stormwater controls and structures, performing any maintenance or cleaning tasks, and implementing stormwater pollution prevention BMPs. This program does not apply to the MS4 structures and roadways in Garden City which are owned by ACHD. The **Intergovernmental Agreement** (Appendix A) drafted by permittees identifies ACHD as the lead agency responsible for stormwater infrastructure and street management requirements under the NPDES permit.

3.5.1 Inspection and Maintenance of Garden City Stormwater Infrastructure

The Environmental Division inspects all permanent stormwater structures located on City owned streets, parks, and facilities at a minimum of twice annually. If inspections reveal that maintenance is required for any structure, such as sweeping, replacing filter media, or catch basin or inlet cleaning the Environmental Division creates a work order for the appropriate Public Works division. The Parks and Waterway division performs general maintenance and sweeping, and the Collections Division is responsible for catch basin and interceptor maintenance and pump outs. If BMPs need to be implemented to prevent the discharge of pollutants from a City facility, the Environmental Division prescribes the correct BMP with the guidance of the IDEQ Catalog of Stormwater Best Management Practices.

3.5.2 Inventory of Garden City Facilities and Stormwater Structures

To manage and report on the inspection and maintenance program for City stormwater infrastructure, an inventory of Garden City facilities and the stormwater structures at each site is stored in the Public Works database. Additionally all City owned facilities are designated on the City's interactive GIS map (Appendix G - **GC Structure Controls Map**) Inspections and maintenance activities are scheduled and tracked in the database to ensure the appropriate inspection frequency. All actions regarding stormwater management of Garden City's facilities can be compiled by the data base program and are summarized in the Annual Stormwater Report. The current inventory and the type of stormwater structures are presented in the following table:

Facility Name	Stormwater Structures	Management Tasks
Animal Control Facility	Swale (1), Curb cut (1)	Keep free of debris, replace filter media/ remove sediment, parking lot sweeping
Boys and Girls Club of ADA County	Valley trough, Catch basin (4) Greenbelt swale	Parking lot sweeping, inlet cleaning, clean curb cuts, pump out catch basins. Clean debris from swale.
City Hall	Swale (2), Catch basin (15), Curb cuts (7)	Keep free of debris, maintain filter media/ remove sediment, parking lot sweeping, inlet cleaning, clean curb cuts, pump out catch basins
Herron View Park/Senior Center	Swale (1)	Keep free of debris, replace filter media/ remove sediment, parking lot sweeping

Parking Lot at 36th Street	Permeable Pavers (2 areas), Landscape Drain Inlet & Drain Pipe (1), Catch basin (1)	Keep free of debris, replace filter media/ remove sediment, parking lot sweeping, clean landscape drain, pump out catch basin
Police Department	Catch basin (5), underground seepage drain	Parking lot sweeping, inlet cleaning, pump out catch basins
Public Works Ops Facility at 38th Street	Swale (1)	Keep free of debris, replace filter media/ remove sediment
Public Works Storage Facility at 46th Street	Swale (1), Curb cut (1)	Keep free of debris, replace filter media/ remove sediment, parking lot sweeping
Riverfront Park	Catch basin (4)	Pump out catch basins
Riverside Pond	Swale (1), Curb cut (1)	Keep free of debris, replace filter media/ remove sediment, parking lot sweeping
Riverpointe Drive Roadway	Gutter (2), Catch basin (3)	Clean gutters and catch basin inlets, road sweeping, pump out catch basins

Waterfront Park	Swale (2)	Keep free of debris, replace filter media/ remove sediment, parking lot sweeping

3.5.3 Garden City Facility Stormwater Pollution Prevention Plan

In order to meet the NPDES requirement, the City of Garden City has developed and implemented **SWPPPs for the Operation Center and the 46th Street Storage Facility**. (Appendix G)

3.5.4 Additional Control Measures

Additional control measures intended to minimize or eliminate the discharge of pollutants from City facilities and operations include:

- **Parking lot and pathway deicing** – the Parks and Waterways division uses an environmentally friendly alternative to sodium chloride based deicer. Deicing materials and equipment are stored indoors.

- **Pesticide, herbicide, and fertilizer applications** – the Parks and Waterways division is responsible for applications of pesticide, herbicide, and fertilizer on City property. Pesticides are kept in secure storage under cover.

- **Street repair** – street and infrastructure repair activities conducted by Garden City Public Works or contractors requires the use of appropriate stormwater pollution prevention and construction site runoff controls. The Construction Division has received ESC training and the Environmental Division helps perform stormwater or erosion control inspections and implement BMPs to protect stormwater quality and prevent illicit discharges.

- **Litter Control –** Garden City residents are provided curbside trash and recycling service. The Parks and Waterways removes litter from City facilities during routine maintenance. Garden City works with the City of Boise to sponsor the annual River Sweep event to remove litter collected along the banks of the Boise River, including stormwater outfalls along the Greenbelt path in Garden City.

- **Training –** Garden City Public Works employees receive annual training to manage spills at City facilities to identify and prevent illicit discharges.

3.6 Education, Outreach and Public Involvement

Garden City works with fellow Permittees to implement the requirements of the NPDES permit regarding education, outreach and public involvement. **The Intergovernmental Agreement** (Appendix A) designates the City of Boise as the lead agency responsible for the Public Education Program. To assist with program support Garden City commits funding for its share of the annual cost of the program administration, which is determined during the annual budget meeting held every January.

Working together under the name Partners for Clean Water, the Permittees have developed a stormwater website to provide the general public and business members of the community with information regarding stormwater management, educational and volunteer opportunities, and to review the actions and activities completed annually by the Permittees to limit the discharge of pollutants discharge to the Boise River and its tributaries. The website: http://www.partnersforcleanwater.org/

To complement the Partners for Clean Water education and outreach program, Garden City has made efforts to educate and involve the public in the following ways:

- **Garden City website:** the Environmental Division section provides links to related stormwater websites, educational documents, BMP and design manuals. Website address: http://www.gardencityidaho.org/
- **Public notice requirements**: A public review and comment period of Garden City's Stormwater Management Plan document has been provided in compliance

with State and local public notice requirements. Garden City's Annual Stormwater Reports are placed on the Partners for Clean Water website for review by the public.

- **Targeted education and training:** During the implementation of specific control measures discussed above, construction operators, design professionals, and industrial and commercial facility managers/owners are provided educational guidance or materials regarding aspects of stormwater management.

4. Discharges to Water Quality Impaired Receiving Waters

In 2010 the IDEQ determined that sections of the Boise River are impaired by one or more the following "Pollutants of concern" (PoC): Total Phosphorus, Sediment, Temperature, and E. coli (bacteria). Garden City's Stormwater and Discharge Control Ordinance prohibits all non-stormwater discharges to the MS4 and each of the six Minimum Control Measures is designed to prohibit or prevent the discharge of pollutants of any kind, including the PoCs.

Control Measure	**Pollutant(s) of Concern controlled**
Construction Site Runoff Control	Sediment
Stormwater Management for New and Redevelopment	On-site retention and treatment requirements address all pollutants
Industrial and Commercial Stormwater Discharge Management	All non-stormwater discharges prohibited; inspections look for illicit discharges of all pollutants
Illicit Discharge Management	All non-stormwater discharges prohibited; inspections look for illicit discharges of all pollutants; E. coli from leaking trash

	containers
Stormwater Infrastructure and Street Management	Sediment, total phosphorus, E. coli
Education, Outreach, and Public Involvement	Inform public about pollutants of concern and how to prevent discharges of all of them

To evaluate the effectiveness of Garden City's SWMP in reducing the discharge of pollutants to the MEP, water quality monitoring data for sections of the Boise River impacted by Garden City will be periodically reviewed to detect any reductions or increases in levels of pollutants of concern compared to 2010 data. Sources of monitoring data include the ACHD and IDEQ outfall and surface water quality monitoring programs.

5. Monitoring, Recordkeeping, and Reporting Requirements

The **Intergovernmental Agreement** (Appendix A) designates the ACHD as the lead agency responsible for the implementation of the MS4 monitoring program. To assist with program support Garden City commits funding for its share of the annual cost of the monitoring program, which is determined during the annual budget meeting held every January.

5.1 Garden City Recordkeeping and Reporting Requirements

The Garden City Environmental Division retains records of all data and information used in the development and implementation of the SWMP. All records are stored electronically in the Public Works database for up to five years or greater. For the inspections and enforcement actions conducted in the implementation of the Industrial and Commercial Discharge Management and Illicit Discharge Management control measures, hard copies are kept in addition to electronic copies stored in the database. All records are accessible to the IDEQ or

EPA upon request to the Environmental Division; the public may access records by filing a Public Information Request with the Garden City Clerk.

Each year Garden City compiles an Annual Stormwater Report for the NPDES required reporting periods of October 1st to September 30th the following year (please note the first Permit year was Feb. 1, 2013-Sept.30, 2013) The Annual Report is submitted to the ACHD, the agency responsible for coordinating the preparation and submittal of all permittees' Annual Reports to the IDEQ and EPA at the end of each January of the Permit term (February 1, 2013 – January 30, 2018).

Garden City's Annual Report shall follow the guidelines established in the NPDES permit Part IV.C.3.c. The tracking of plan reviews, inspections, enforcement actions, stormwater infrastructure maintenance in the implementation of the Minimum Control Measures discussed in Section 3 provide data and statistics that are included in the report. The Annual Report is used in assessing Garden City's compliance with permit conditions and implementation schedule.

5.2 Subwatershed Planning

The NPDES Permit requires that the permittees jointly complete at least two individual subwatershed plans no later than September 30, 2016, select watersheds that discharge directly to listed waters, and select and identify the two watersheds in the first permit year report.

ACHD has taken the lead for this plan. After discussing the plan with the co-permittees and EPA they have chosen Americana (873 acres) and Main Street (80 acres) as the two subwatersheds.

6. Legal Authority

Garden City has adequate legal authority through Garden City Code (G.C.C) and the **Intergovernmental Agreement** (Appendix A) to control pollutant discharges into and from its MS4 to meet the requirements of the NPDES permit Part II.G. Below is a summary of the

unique legal authorities which satisfy the five legal authority criteria specifically listed in the permit:

- Criteria 1: Must have authority to prohibit discharge of pollutants to the MS4 by illicit connections and discharges.

  Satisfying legal authority:

  G.C.C § 4-14-9: Illicit Connections – prohibits illicit drainage connections to the MS4
  G.C.C § 4-14-5: Discharge of Pollutants – prohibits non-stormwater discharges

- Criteria 2: Must have authority to control the discharge to the MS4 of spills, dumping or disposal of materials other than stormwater.

  Satisfying legal authority:
  G.C.C § 4-14-5: Discharge of Pollutants – prohibits non-stormwater discharges to MS4
  G.C.C § 4-14-12: Outdoor Storage Areas; Commercial and Industrial Facilities – illicit discharge and spill prevention/containment system requirements
  G.C.C § 4-14-7: Notification of Spills

- Criteria 3: Must control through interagency agreements the contribution of pollutants from one portion of the MS4 to another portion of the MS4.

  Satisfying legal authority:

  Intergovernmental Agreement for Roles and Responsibilities under the NPDES Municipal Stormwater Permit (Permit #IDS-02756-1) and Operating Guidelines. (Appendix A)

- Criteria 4: Must have authority to require compliance with conditions

  Satisfying legal authority:
  G.C.C § 4-14-21: Acts Resulting in Violation of Federal Clean Water Act
  G.C.C § 4-14-23: Civil Actions
  G.C.C § 4-14-24: Administrative Enforcement Powers
  Utility Billing Policy - #13 Environmental Fine and Cost Recovery Schedule

- Criteria 5: Must have authority to carry out all inspection, surveillance, and monitoring procedures necessary to determine compliance and non-compliance with Permit conditions including the prohibition on illicit discharges to the MS4

Satisfying legal authority:

G.C.C § 4-14-16: Authority to Inspect

G.C.C § 4-14-5: Discharge of Pollutants - prohibits non-stormwater discharges to MS4

Appendix A

Intergovernmental Agreements Between NPDES Permittees

Table of Contents:

City of Boise
Public Works Department
Environmental Division
P.O. Box 500
Boise, ID 83701-0500
150 N. Capitol Blvd., 4th Floor
(208) 384-3901
www.cityofboise.org/public_works

STW 653 B.1 6-06

GARDEN CITY PUBLIC WORKS DEPARTMENT

Policy and Procedure

Chapter:	8 Environmental	Number:	8.2
Subject:	Accidental Spill Response Policy & Procedure		
Used By:	Public Works		
Issued:	05/09/2009	Revised:	11/01/2010

Purpose: To protect public & employee health and safety. To protect the POTW, the MS4 storm drains system & the environment and provide appropriate response to accidental spills to Local, State & Federal Regulations.

Policy:

1. In the event Public Works Administrative Staff receives a call in which the caller is reporting an accidental spill or a discharge to the storm water system the "Storm Water / Accidental Spill Response Form" will be used and the procedures outlined therein shall be followed. The incident will then be reported in the following sequence:
   a. Fire Department – 911 if applicable *(*see response form)*
   b. Immediate Supervisor
   c. Immediate Supervisor shall notify the Director immediately following step "d"
   d. Environmental Division
   e. Completed response forms shall take final depository with the Environmental Division

2. In the event Public Works Operators become aware of an accidental spill incident and/or or discharge the "Operator / 1st Responder Accidental Spill Response Form" will be used and the procedures outlined therein shall be followed.
   a. All spills over 5 gallons or in excess of CERCLA Reportable Quantities, **whichever is more stringent**, must be reported IMMEDIATELY in the following sequence:
      ✓ Fire Department - 911 if applicable *(*see response form)*
      ✓ Immediate Supervisor (If not available contact the Public Works Director)
      ✓ Immediate Supervisor shall notify the Director immediately following step "iv"
      ✓ Environmental Division
   b. The Operator/1st Responder will don all necessary/appropriate Personal Protective Equipment (PPE) and take emergency measures to minimize impact of spill (ie: deploy spill kit, shut down equipment, erect barricades & etc) and/or as directed by authorized personnel.
   c. **Completed response forms shall take final depository with the Environmental Division**

3. Once notified; the Supervisor shall **immediately notify the Public Works Director**

4. Once notified; the Environmental Division shall respond & assess the situation.

a. Environmental Division shall manage mitigation & remediation efforts unless the incident has been relinquished to the Fire Department, DEQ, EPA, Homeland Security or another agency.
b. Environmental Division shall notify "State Com." within 24 hours @ 846-7610 if required. *(*see response form)*
c. Environmental Division shall file all necessary reports
d. Environmental Division and Supervisor shall brief and maintain updated status reports to the Public Works Director

5. In the event the Environmental Division cannot be reached, it is the responsibility of the Supervisor to report the spill incident to State Com and manage mitigation & remediation efforts under the direction of the Public Works Director.

6. If the Supervisor cannot be contacted the Public Works Director must be contacted. The Public Works Director will manage the mitigation efforts as necessary.

7. In the event the Operator / 1st Responder cannot contact either the Supervisor, Environmental Division nor the Public Works Director and the spill is of a hazardous nature and/or meets or exceeds CERCLA reporting limits they shall contact the Fire Department (911) immediately and State Com within 24 hours @ 846-7610

Risk:

Loss or damage to human health & the environment, increased liability and/or potential litigation. Non - compliance with Local, State & Federal Regulations.

Attachments:

8.2.0
8.0.0 Storm Water / Accidental Spill Response Form
8.2.1
8.0.1 Operator 1st Responder Accidental Spill Response Form

Director of Public Works Signature

1-11-11
Date

STORM WATER & ACCIDENTAL SPILL RESPONSE FORM

Date: **Time:**

.ller Name: **Phone:**

Address or description of incident or location:

Responsible party (if known): **Phone:**

Company signs or logo on discharging vehicle: **Vehicle license #:**

Incident explanation ***(including time and date):***

IF SHADED AND POSES A THREAT TO HEALTH AND SAFETY, CALL FIRE DEPARTMENT (911)		
LIQUID	**SOLID**	**DEBRIS**
Chemicals ☐	Chemicals ☐	Construction ☐
Type of Chemical	**Type of Chemical**	Yard Waste (grass & leaves) ☐
Petroleum Products ☐	Sewage > 10 gals ☐ Sewage < 10 ga ☐	Trash ☐
Pesticides/Herbicides ☐	Pesticide/Herbicides ☐	Dirt ☐
Unknown ☐	Other:	Other:
Antifreeze > 10 gals ☐ <10 gals ☐	Unknown ☐	Amount Released:
Grease > 10 gals ☐ < 10 gals ☐	Amount Released:	
Paint > 10 gals ☐ < 10 gals ☐	EX: a pickup load = 2 cubic yds. 6 wheeler dump truck = 5 cubic yds.	
Amount Released:		
Other:		

Call taken by: **Call referred to:**

Investigator name:

RESPONSE

Investigation? ☐Yes ☐No **Telephone follow-up?** ☐Yes ☐No

Referred? ☐Yes ☐No

Referral agency: Garden City, Environmental Department.

Contact:

Witness name:	**Address:**	**Phone:**	
Is a cleanup necessary? ☐Yes ☐No		**Samples collected?** ☐Yes ☐No	
Chain of custody? ☐ Yes ☐No		**Is followup inspection necessary?** ☐Yes ☐No	
Lab name:		**Phone:**	
Photographs taken? ☐Yes ☐No			
Photo #:	**Photo description:**		
Photo #:	**Photo description:**		
Photo #:	**Photo description:**		
Photo #:	**Photo description:**		
Photo #:	**Photo description:**		
Situation summary/recommendation:			
Letter sent? ☐Yes ☐No **Followup:**			

OPERATOR / 1st RESPONDER ACCIDENTAL SPILL RESPONSE FORM

Name: **Date:** **Time:**

Address or description of incident or location:

Responsible party (if known): **Phone:**

Company signs or logo on discharging vehicle: **Vehicle license #:**

Incident explanation ***(including time and date):***

IF SHADED AND POSES A THREAT TO HEALTH AND SAFETY, CALL FIRE DEPARTMENT (911)

LIQUID	SOLID	DEBRIS
Chemicals ☐	Chemicals ☐	Construction ☐
Type of Chemical	Type of Chemical	Yard Waste (grass & leaves) ☐
Petroleum Products ☐	Sewage > 10 gals ☐ Sewage < 10 ga ☐	Trash ☐
Pesticides/Herbicides ☐	Pesticide/Herbicides ☐	Dirt ☐
Calcium Hypochlorite ☐	Other:	Other:
Unknown ☐	Other:	Other:
Antifreeze > 5 gals ☐ <5 gals ☐	Unknown ☐	Amount Released:
Grease > 5 gals ☐ < 5 gals ☐	Amount Released:	
Paint > 5 gals ☐ < 5 gals ☐	EX: a pickup load = 2 cubic yds. 6 wheeler dump truck = 5 cubic yds.	
Amount Released:		
Other:		

Supervisor Contacted? ☐Yes ☐No **Time:**	**Environmental Contacted?** ☐Yes ☐No **Time:**
Fire Dept (911) Called? ☐Yes ☐No **Time:**	**State Com Called?** ☐Yes ☐No **Time:** **(846-7610)**
Incident Responsibility Relinquished? ☐Yes ☐No **Time:**	**Relinquished To:**
If not relinquished complete pg 2	

RESPONSE

a cleanup necessary? ☐Yes ☐No	**Samples collected?** ☐Yes ☐No
Chain of custody? ☐ Yes ☐No	**Is follow-up inspection necessary?** ☐Yes ☐No
Lab name:	**Phone:**
Photographs taken? ☐Yes ☐No	
Photo #:	**Photo description:**
Photo #:	**Photo description:**
Photo #:	**Photo description:**
Photo #:	**Photo description:**
Photo #:	**Photo description:**

Clean-up Efforts

Situation summary/recommendation:

Comments:

GARDEN CITY PUBLIC WORKS DEPARTMENT

Policy and Procedure

Chapter:	8 Environmental	Number:	8.14
Subject:	Inspection and Enforcement of High Priority Permanent Storm Water Management Controls		
Used By:	Environmental Division; Developmental Services		
Issued:	11/3/2017	Revised:	

Purpose: To establish a policy and procedure to help assure Garden City compliance with the NPDES Permit along with State and Federal laws by ensuring proper long term operation and maintenance of all permanent storm water management practices within Garden City jurisdiction.

Policy: Pursuant to Garden City Code § 4-14 Stormwater Management and Discharge Control and the most current Boise City "Storm Water Management Design Manual", permanent storm water management controls will be assessed for compliance with applicable local, state, and Federal laws using the procedure below.

This policy establishes a fair and uniform means of initiating, documenting, and conducting inspections and enforcement actions in response to violations storm water codes and ordinances.

The Public Works Department recognizes that violations arise under a variety of circumstances and this policy establishes procedures designed to address those circumstances most commonly faced by inspection personnel. This policy provides inspection personnel with an enforcement protocol to follow in order to bring code violations into compliance with applicable codes and/or standards.

Procedure:

I. Building Plan Review

1. Applicants submit drainage plans for their construction project as part of the building permit application process.
    a. Drainage design must comply with City Code, the most current Boise City "Storm Water Management Design Manual" and are reviewed and approved by the Garden City Engineer and the Garden City Environmental Manager.
    b. All drainage construction observations must be performed by the client's design engineer.

II. Drainage Construction Final Inspection

1. Contractor/builder must submit to the Garden City Environmental Division the following documentation prior to the final inspection for final approval:

   a. The design engineers drainage construction observation reports

   b. A signed, written statement from the design engineer that all drainage structures and appurtenances were constructed as per the approved plan

2. An Environmental Division inspector will perform a site inspection and assess compliance.

3. The inspection will be tracked in the database with an electronic inspection report.

4. This inspection satisfies the NPDES requirement in Part II B 2 (f)I which states "The inspections must determine whether storm water management or treatment practices have been properly installed (i.e., an "as built" verification)."

5. Once a final inspection has been conducted and is approved, the site must be evaluated to determine if it is a High Priority and require annual inspections. (see below)

III. High Priority Site Inspections

1. Garden City takes care of all High Priority Site Inspections for commercial and industrial sites. Ada County Highway District takes care of all High Priority Site Inspections for residential developments & subdivisions.

2. The City must first define and prioritize new development and redevelopment sites for annual inspections of permanent storm water management controls. Factors used to prioritize sites include, but not limited to: size of new development or redevelopment area; sensitivity and/or impaired status of receiving water(s); and, history of non-compliance at the site.

For each category, points are assigned depending on site characteristics using the following matrices. Add the total amount of points for the site for assessing the frequency of inspections. Should the points total 3 or more the site is considered High Priority and must be inspected annually.

Compliance History	Points
2 or more Violations	1
0-1 Violations	0

+

Size site	Points
less than 1 acre	1
between 1-5 acres	2
greater than 5 acres	3

+

Discharge	Points
Waters of US	3
Retained on site	0

= Total

IV. Inspection Procedure

The inspections must determine whether storm water management or treatment practices have been properly installed. The inspections must evaluate the operation and maintenance of such practices, identify deficiencies and potential solutions, and assess potential impacts to receiving waters.

Inspections will consist of the following steps:

1. Inspect using approved checklist
2. Assess compliance with City Code and Design Manual
3. Assess potential impacts to receiving waters
4. Take pictures to document violations as necessary
5. Make correction notice to owner if necessary
6. Track inspection in database with electronic inspection report
7. Take necessary follow-up actions (re-inspection/enforcement)

V. Enforcement response and escalation matrix

IF A VIOLATION HAS BEEN IDENTIFIED THE INSPECTOR SHALL:

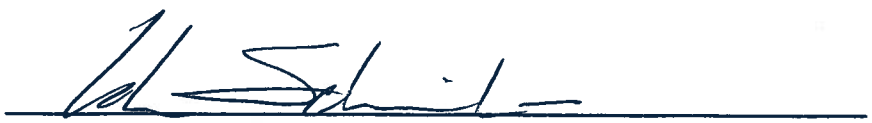
1. Issue a verbal correction notice in person or by phone
2. Set expectation of when correction should be completed based on the severity of the non-compliance
3. Document inspection, violation and compliance date in database.
4. A formal written Notice of Violation may be issued if compliance is not achieved by the compliance date.
    a. Set a new compliance date

5. If compliance has not been achieved by the compliance date issue a second Notice of Violation and a fine as per the current City Code for environmental violations.

6. If compliance has still not been achieved, obtain approval from Environmental Manager and Public Works Director to recommend the issue to the City Attorney for prosecution.

Attachments:

8.14.1 – High Priority Permanent Storm Water Management Site Inspection Checklist



Public Works Director Signature

11-17-17

Date

Appendix D

Checklist and Inspection Forms

Table of Contents:

Figure-A Stormwater Management Checklist

Drainage Report

- ☐ prepared and stamped by a qualified Idaho licensed professional
- ☐ narration for basis of selection and operation of the drainage design[6]
- ☐ pre- and post-development peak flow rate calculations (if applicable)
- ☐ pre- and post-development runoff volume calculations (if applicable)
- ☐ copies of associated permits, easements, and discharge agreements
- ☐ a copy of the site's Phase 1 Site Assessment (if available)
- ☐ infiltration facilities: two copies of Geotechnical Report (Section 3.3.1)
- ☐ comprehensive drainage plans (greater than 10 acres): flood routing and computations for the 100 year flood through the site
- ☐ multi-phase developments: the drainage report must include pertinent data from other phases

Drainage Plan

- ☐ five copies of the complete drainage plan, including detail sheet, are to be submitted
- ☐ topographic map using NAVD-88 datum (if possible) of pre-developed and finished grade contours at 1' or 2' intervals[7]
- ☐ on-site proposed building elevations of adjoining lots & finish floors
- ☐ grade of all impervious surfaces
- ☐ existing drainage and irrigation water conveyance systems within the property line or developed site
- ☐ new or modified drainage systems including system dimensions, profiles, elevations or spot elevations at key locations
- ☐ standard note on the plans requiring the construction stage and scheduling of drainage facility inspections by the Boise Public Works Department[8]
- ☐ infiltration facilities: standard note requiring that the bottom of the system be constructed at least 12" into free draining material
- ☐ Operation and maintenance (O&M) plan

6 Minor design adjustments are acceptable if the applicant provides supporting design documentation.
7 Greater contour intervals may be used on steeper slopes if the grade information is unreadable.
8 Contractors must provide a 24 hour notice to the Boise Public Works Department.

General Storm Water System Inspection Form

FACILITY: **STI20 __ -_____** **Date of last Rain: ___/___/_____**

Facility Name:_____ **Inspector:**_____

Address:_____ **Date:**____/____/____ **Time:**_____:_____

Contact/Title:_____ **Phone # (____) _____-_____**

OUTSIDE STORM DRAINS

Type of Storm Drain	Location	Amount	BMP
1.			
2.			
3.			

MAINTENANCE PRACTICES OF STORM DRAINS

a. Are storm drain inlets periodically inspected, maintained, and/or cleaned? **NA / Y / N**

if yes, **Method:** _____ **Frequency:** _____

Service Provider: _____ **Last date cleaned** ___/___/_____

b. Sanitary sewer pretreatment equipment with potential to overflow/spill to parking areas/MS4? **NA/Y/N**

c. Are the parking areas periodically cleaned? **NA / Y / N**

if yes, **Method:** _____ **Frequency:** _____

Service Provider: _____ **Last date cleaned** ___/___/____

d. Pretreatment equipment associated with the sites' storm water system? **NA / Y / N**

Type of Equipment: _____ **Location:** _____

Frequency: _____ **Service Provider:** _____ **Date:** ___/___/____

e. Are the floor areas including repair and maintenance area floors periodically cleaned? NA / Y / N

Location:	Methods:	Frequency:	Discharge to:

f. Any facility tests conducted for illicit connections to the storm drain systems (visual inspections, dye tests)? NA / Y / N

Type of Testing:_____ **Location:**_____

Results: _____ **Corrections: NA / Y / N / unsure**

Comments: _____

MAINTENANCE PRACTICES FACILITIES

a. Are there any connections the facility or inspector is unable to determine? Y / N

b. Is there any vehicle repair and maintenance onsite (including painting & lubrication) Y / N

c. Are repair and maintenance areas exposed to storm water? Y / N

FUELING ON SITE ***Y / N***

d. Does fueling occur on-site? Y / N **if No skip to j** and is it mobile? Y / N

e. Is fueling ASPP adequate? Y / N

f. Is the fueling area covered? Y / N

g. Are there any drains in the fueling area? Y / N **if yes,**

h. Where do the respective drains discharge? □ **storm** □ **dry well** □ **sanitary** □ **other**

i. is there an oil water separator in the fueling are collection system? Y / N

VEHICLE WASHING ON SITE *Y / N*

Are there areas where vehicles and/or heavy equipment are washed? **Y / N, if No skip to q**

k. Does the facility use a mobile washer? **Y / N if yes, enter vendor name:**

l. Are there any drains in the wash area? **Y / N**

m. Where do the drains discharge? **□ storm, □ dry well, □ sanitary, □ other**

n. Is the wash water captured before entering any drains? **Y / N**

if yes, how is the water disposed of?

o. Is there any oil water separator in the wash water collection system? **Y / N**

p. Is the wash water exposed to the storm water? **Y / N**

q. In general for Section 4, is there adequate storm drain protection, spill containment, etc.? **Y / N Note any concerns?**

_____

OUTDOOR STORAGE PRACTICES

Location	Type	Amount	Size	BMP
_____	_____	_____	_____	Y / N
_____	_____	_____	_____	Y / N
_____	_____	_____	_____	Y / N

MS4 DISCHARGES *Y / N*

1a. Approximate outdoor area covered by industrial activities (sq ft)? _____

1b. Approximate outdoor area covered by industrial activities (%)? _____

c. Impervious surfaces in industrial area (%) – if 0 skip all _____

2. Site Drainage – add all that apply (indicate on site map)

- ☐ **Sheet flow to street from facility entrance apron only**
- ☐ **Direct pipe connection to ACHD System, pipe diameter** _____
- ☐ **Sheet flow to street/MS4 (other than facility entrance apron)**
- ☐ **Direct connection to other waters of U.S> (canal, ditch, etc..)**
- ☐ **Other, describe** _____

_____

3. Is runoff from this site connected to the NPDES-permitted MS4? **Y / N**

4. Is there potential for non-storm water discharges from site to MS4? **Y / N**

If yes, explain _____

5. Any observed dry weather discharges? **Y / N**

6. Any permitted non-storm water discharges? **Y / N**

if yes, type of discharge: _____ **authorized/permitted Y / N**

compliant with permit requirements **Y / N**

. Identify the industrial source(s). _____

_____

8. Any roof drainage pollutants observed? **Y / N**

9. Rooftop air pollution concerns? **Y / N**

10. ASPP Concerns? **Y / N**

11. Floor cleaning discharge to outside? **Y / N**

SITE NOV HISTORY OR ENFORCEMENT ACTIONS

a. Any NOV's or Enforcement Actions in the past? **Y / N if yes explain**

Type: _____ **Date:** ___/___/_____

Agency: _____ **Complete Requests: Y / N**

Comments: _____

_____

SITE SPILL HISTORY

a. Any spills in the last 3 years? **Y / N, if yes explain**

Material: _____ **Quantity:** _____

Type: _____ **Date:** ___/___/_____

Agency: _____ **Complete Requests: Y / N**

Action Taken: _____

Comments: _____

SITE HISTORY CONTROL PERMITS (OTHER)

a. List any other control permits held by or issued to facility.

Title/No: _____

Issuing Agency: _____

Issue Date: _____

Exp. Date: _____

Description: _____

ACHD Industrial Stormwater Inspection Checklist

Business Name:_____ **Date & Time:**_____ **Phone:**_____

Address:_____ **Contact/Title:**_____

Facility Primary SIC code (by revenue):_____ **Business Description:** _____

Investigator Name (s): _____ **Inspection:** (Announced) (Unannounced) Other: _____

Inspection Type: ___ Pretx/Stormwater Combined OR ___ Stormwater only ___ **Initial** Or ___**Follow-Up**

Previous Inspection Date: _____ **Next Inspection Tentative Date:** _____

Facility type per Stormwater Regs:

___Industrial Stormwater NPDES Permittee ___Subject to SARA Title III Section 313, a.k.a. EPCRA

___Other or comments: _____

If an Industrial NPDES Permittee:

Title of Permit:_____ Permit No.:_____ Issue Date:_____ Expiration Date:_____

Do they have an SWP3? (Y) (N) Is it being implemented? (Y) (N) (*Obtain a copy of the SWP3*)

Are the visual inspection records stored with the SWP3? (Y) (N)

When was the last annual site compliance evaluation? Date: _____

Based on it, were there any changes made to the SWP3? (Y) (N) (*obtain updated copy if necessary*)

Is analytical storm water monitoring required at this site? ☐Yes ☐No If so, how many outfalls are monitored: _____

Date of last significant rain: _____ Have all required samples been collected to date? ☐Yes ☐No

Do the stormwater sample points adequately represent potential pollution from sources? ☐Yes ☐No

Is there a No-Exposure certification? *(NPDES Industrial Stormwater exemption)* ☐Yes ☐No (*If Yes, indicate permit no. above*)

If a SARA Title III, Section 313 facility:

Note any leaks or conditions that would lead to discharges of Section 313 water priority chemicals or could lead to direct contact of Stormwater with raw materials, intermediate materials, waste materials or products _____

_____

Site History

Have there been any NOV's, citations, or other regulatory actions against the facility by DEQ, IDWR, EPA or others in the past three years? ☐Yes ☐No If Yes, explain: _____ Number of AST's:____

Have any spills been reported in the last three years? ☐Yes ☐No If so, material spilled:_____

Quantity (gal):_____ Any mitigation action taken:_____

MS4 Discharges

Is runoff from this site connected to the municipal separate storm sewer system (Y) (N)

If yes, how is it connected? (Indicate on Site Map) ____ Sheet flow from parking lot to street ____ On-site detention/ French drain

____ Direct connection ____ Other, describe: _____

_____

Characterize observed dry weather discharges; determine if permitted, if so, is it compliant w/ permit requirements? If not, compare characteristics to ID the industrial source. ID all industrial sources of all dry weather discharges observed.

Is the facility's drainage connected to a regulated body of water? (Y) (N)
If No, verify on maps

Facility & Equipment Maintenance Practices

(A) Are storm drain inlets periodically inspected, maintained, and/or cleaned? (Y) (N) (N/A)

Method & Frequency:_____ By whom?_____ Last Cleaned?_____

(B) Are the parking areas periodically cleaned? (Y)(N) (N/A)

Method & Frequency:_____ By whom?_____ Last Cleaned?_____

(C) Are floor areas including repair and maintenance area floors periodically cleaned? (Y) (N) (N/A)

Locations, methods, & schedules:_____

(D) Has the facility conducted any tests for illicit connections to the storm drain system (e.g., visual inspections, dye test)? (Y) (N)

If yes, type of testing, locations of testing, and results:_____

(E) Inspect any onsite repair and maintenance, fueling, washing, or airport deicing areas for adequate storm drain protection, spill containment, etc. Note any concerns:_____

ACWD Industrial Stormwater Inspection Checklist

Rooftop / Air Discharge Equipment
Any roof drainage pollutants observed? (Y) (N) If yes, describe _____

Material Handling/Manufacturing Areas
Are there any material handling activities exposed to Stormwater? (Y) (N) (Material handling activities include: the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, finished product, by-product, or waste product.)
If yes, what materials are being handled? _____

Have BMPs been implemented (Y) (N) BMP Types: _____

Outdoor Chemical/Product Storage, Other Storage Areas: _____

Outside Storm Drains: _____

Comments: _____

Educational Info:

__StormWater Comm/Ind BMPs__ __FOG Brochure __Local Regs __Ada Haz. Waste Disposal

__StormWater Ordinance Brochure __Other: _____

Site Map
Indicate drainage and discharge structures, paved areas and buildings, surface flow directions, areas of potential soil erosion relative to the MS4. Identify and label all outdoor material storage areas. Distinguish b/w storm and sanitary sewers, ID all manhole locations on map. Note the flow pattern of any unconfined discharges (e.g. cleaning, rinse and wash waters, etc.) and where potential spills may occur including stormwater runoff directions and drop inlets and any oil water separators or other pretreatment devices in the stormwater collection system.

Compliance Status
Compliant ___ Non-compliant __ *(list reasons for non-compliance)* _____

Pending __ *(list changes that need to be made for compliant status to be granted)* _____

High Priority Permanent Storm Water Management Site Inspection Checklist

FACILITY:

Facility Name:_____ **Inspector:**_____

Address:_____ **Date:**____/____/____ **Time:**_____:_____

Contact/Title:_____ **Phone # (____) ____-____**

OUTSIDE STORM DRAINS

Type of Storm Drain	Location	Amount	BMP
1.			
2.			
3.			

MAINTENANCE PRACTICES OF STORM DRAINS

a. Are storm drain inlets periodically inspected, maintained, and/or cleaned? **NA / Y / N**

if yes, **Method:** _____ **Frequency:** _____

Service Provider: _____ **Last date cleaned** ___/____/_____

b. Sanitary sewer pretreatment equipment with potential to overflow/spill to parking areas/MS4? **NA/Y/N**

c. Are the parking areas periodically cleaned? **NA / Y / N**

if yes, **Method:** _____ **Frequency:** _____

Service Provider: _____ **Last date cleaned** ___/____/_____

d. Pretreatment equipment associated with the sites' storm water system? **NA / Y / N**

Type of Equipment: _____ **Location:** _____

Frequency: _____ **Service Provider:** _____ **Date:** ____/____/_____

e. Are the floor areas including repair and maintenance area floors periodically cleaned? **NA / Y / N**

Location:	**Methods:**	**Frequency:**	**Discharge to:**

f. Any facility tests conducted for illicit connections to the storm drain systems (visual inspections, dye tests)? **NA / Y / N**

Type of Testing:_____ **Location:**_____

Results: _____ **Corrections: NA / Y / N / unsure**

Comments: _____

MAINTENANCE PRACTICES FACILITIES

a. Are there any connections the facility or inspector is unable to determine? **Y / N**

b. Is there any vehicle repair and maintenance onsite (including painting & lubrication) **Y / N**

c. Are repair and maintenance areas exposed to storm water? **Y / N**

FUELING ON SITE *Y / N*

d. Does fueling occur on-site? **Y / N** **if No skip to j** and is it mobile? **Y / N**

e. Is fueling ASPP adequate? **Y / N**

f. Is the fueling area covered? **Y / N**

g. Are there any drains in the fueling area? **Y / N** **if yes,**

h. Where do the respective drains discharge? □ **storm** □ **dry well** □ **sanitary** □ **other**

i. Is there an oil water separator in the fueling are collection system? **Y / N**

VEHICLE WASHING ON SITE *Y / N*

j. Are there areas where vehicles and/or heavy equipment are washed? **Y / N, if No skip to q**

k. Does the facility use a mobile washer? **Y / N if yes, enter vendor name:**

l. Are there any drains in the wash area? **Y / N**

m. Where do the drains discharge? □ **storm,** □ **dry well,** □ **sanitary,** □ **other**

n. Is the wash water captured before entering any drains? **Y / N**

if yes, how is the water disposed of?

o. Is there any oil water separator in the wash water collection system? **Y / N**

p. Is the wash water exposed to the storm water? **Y / N**

q. In general for Section 4, is there adequate storm drain protection, spill containment, etc.? **Y / N Note any concerns?**

_____

_____

OUTDOOR STORAGE PRACTICES

Location	Type	Amount	Size	BMP
				Y / N
				Y / N
				Y / N

MS4 DISCHARGES *Y / N*

1a. Approximate outdoor area covered by industrial activities (sq ft)? _____

1b. Approximate outdoor area covered by industrial activities (%)? _____

1c. Impervious surfaces in industrial area (%) – if 0 skip all _____

2. Site Drainage – add all that apply (indicate on site map)

□ **Sheet flow to street from facility entrance apron only**
□ **Direct pipe connection to ACHD System, pipe diameter** _____
□ **Sheet flow to street/MS4 (other than facility entrance apron)**
□ **Direct connection to other waters of U.S> (canal, ditch, etc..)**
□ **Other, describe** _____

_____

3. Is runoff from this site connected to the NPDES-permitted MS4? **Y / N**

4. Is there potential for non-storm water discharges from site to MS4? **Y / N**

If yes, explain _____

5. Any observed dry weather discharges? **Y / N**

6. Any permitted non-storm water discharges? **Y / N**

if yes, type of discharge: _____ **authorized/permitted Y / N**

7. Compliant with permit requirements **Y / N**

8. Identify the industrial source(s). _____

_____

9. Any roof drainage pollutants observed? **Y / N**

10. Rooftop air pollution concerns? **Y / N**

11. ASPP Concerns? **Y / N**

12. Floor cleaning discharge to outside? **Y / N**

SITE NOV HISTORY OR ENFORCEMENT ACTIONS

a. Any NOV's or Enforcement Actions in the past? **Y / N if yes explain**

Type: _____ **Date:** ____/____/_____

Agency: _____ **Complete Requests: Y / N**

Comments: _____

SITE SPILL HISTORY

a. Any spills in the last 3 years? **Y / N, if yes explain**

Material: _____ **Quantity:** _____

Type: _____ **Date:** ____/____/_____

Agency: _____ **Complete Requests: Y / N**

Action Taken: _____

Comments: _____

SITE HISTORY CONTROL PERMITS (OTHER)

a. List any other control permits held by or issued to facility.

Title/No: _____

Issuing Agency: _____

Issue Date: _____

Exp. Date: _____

Description: _____

Appendix E

Drainage System Permanent Controls Inventory and Tracking

Table of Contents:

Name	Parcel	Site Address	BLD	Various Structures	Type Structure	Manual	Agreement	O & M Requirements	Activity	Non Routine Inspection Schedule	Responsible Party	Routine Complete Self Inspection
Advanced Auto Parts	R2734510194	4379 W. Chinden Blvd.	BLDFY2017-0093	4	(4)Catch Basins, (1)Seepage Bed, (3)Swales, (1)1000 gallon DCI	Yes	Yes	Inspections Maintenance	Auto Parts Sales	Periodic Maintenance	Property Owner	Monthly, biannually
Anser Charter School	R2734501132	202 E. 42nd Street	BLD2015-00056		Swale	No	No		Charter School			
Bowman Funeral Home	R1292650110	10254 Carlton Bay Dr.	BLD2013-00038	2	(1)Catch Basins, (1)Swale	Yes	No	Inspections, Maintenance	Funeral Home	Following Storm Event Greater than	Property Land Owner	3-4 Times annual
Cutting Edge Landscape	R1657730020	5373 N Alworth	BLDFY2016-0040	2	(1)DCI, Permeable pavers	Yes	Yes	Inspections Maintenance	Landscape Maintenance	Following Storm Event	Cutting Edge Owners	Biannually, Annually
Discount Tire	S0524449402	6939 W State Street	BLDFY2016-0054	1	(2)Swales	Yes	Yes	Inspections, Maintenance	Tire Sales	Regularly	Owner	Quarterly, Annually
Dutch Bros. Coffee	R7334170105	5177 Chinden Blvd	BLD2013-00079	1	(1)Swale	Yes	No	Maintenance	Coffee Drink bistro	Minimum 2X yearly	Dutch Bros General Facilities Manager	April, September, after rain events greater
Eberlestock	R2734510794	215 W. 41st Street	BLD2013-00111	3	1Swale, 1vault with pump, 2 DCI with seepage bed	No	No	Inspections, Maintenance	Backpack Manufacturer	Inspected 3x annually + after storms	Glen Eberle	March, July, November, after storms
Emerson House	R8191505740	8250 W. Marigold	BLDFY2017-0096	1	(1) Swale	Yes	Yes	Inspections, Maintenance	Senior Living Facility	Following Significant Rainfall Event	Emerson House Owners	Monthly, Biannually, Annually
Garden City-City Hall	R1431980300	6015 Glenwood	PWU2013-00120	3	(2) DCI, (2) swales	No	No	Inspections, Maintenance	Buisness Offices/ Library	Following Significant Rainfall Event	Garden City Public Works	Inspect 2x annually - April & Sept.
Garden City E. 36th St. Parking Lot	R2734540523	301 E. 36th Street	PWU2015-00045	3	(1)DCI, (1)seepage bed, (2)Permeable Pavers	Yes	No	Inspections, Maintenance	Parking Lot	Following Storm Event	Garden City Public Works	monthly, biannual, Annually

Garden City Operations Center Shed Addition	R2734520480	207 E 38th Street	BLDFY2016-0038	1	(1)Swale	Yes	No	Inspections, Maintenance	Encloses Storage Shed	Periodically and Following Storm Events	Garden City Public Works	Monthly, April and September
Grace Assisted Living	S0514346780	9995 State Street	BLDFY2016-0113	3	(1)1000 gallon DCI, (1)seepage bed, (2)swale	Yes	Yes	Inspections, Maintenance	Senior Living Facility	Periodically	Owners of Grace Assisted Living	Biannually
Grace Assisted Living	S0514346740	9779 W. State St	PWUFY2017-0011	1	(2)Permeable Pavers	Yes	Yes	Inspections, Maintenance	Senior Living Facility	Periodically	Owners of Grace Assisted	Quarterly, Annually
Legacy Apartments	R7334160564	507 E. 51st Street	BLD2015-00010	4	(1)Swales, (9)1000 Gallon DCI, (5) Seepage Beds, (9)Catch Basin	Yes	Yes	Inspections, Maintenance	Apartment Community	No Specification In O & M Manual	Owner of Legacy Apartments	Monthly, Biannually, Annually
Moffat Homes	R2734501880	210 E. 40th Street	BLD2013-00090	3	Swales	No	No	Inspections, Maintenance		As Needed	Moffat Homes LLC.	Monthly, annual,
Mr. Mudd	R7334161301	400 E 52nd Street	PWUFY2016-0010	2	(3)Swales, (1)Catch Basin	yes	Yes	Inspections Maintenance	Concrete Dry mix Plant	Following Rain Event Greater than 0.5"	Property Owner	April and September
Nelson's RV's	R7334170135	5309 Chinden Blvd	BLD2013-00083	2	DCI	Yes	No	Maintenance	Recreational Vehicle Sales &	Following large Storm Event	Nelson's RV/ Property Owner	April and September
Powderhaus Brewery	R3045770400	9719 Chinden blvd	BLD2014-00138	1	(2)Swales	Yes	No	Inspections, Maintenance	Beer Manufacturing	Following Storm Events	Property Owner	Annually
Primary Health	R5639760300	5601 Chinden Blvd	BLD2015-00125	2	(1)1000 gallon DCI, Seepage Bed	Yes	No	Inspections, Maintenance	Quick Care Medical Facility	Following large rainfall event	Property Owner	Biannually
Renaissance Building	R2734501061	108 E 42nd Street	BLDFY2016-0112	1	(1)Swale	Yes	Yes	Inspections Maintenance	Building Architectural Firm	Following Stormwater event greater	Building Owner	April and October

Riverside Hotel (East Parking Lot)	R2734541990	2900 W. Chinden Blvd	PWUFY2016-0004	1	(4)Permeable Pavers	Yes	Yes	Inspections, Maintenance	Hotel Parking Lot	Following Storm Events	Building Owner	Monthly, Annually
Riverside Hotel (Sandbar Expansion)	R2734541990	2900 W. Chinden Blvd	PWUFY2016-0003	1	Permeable Pavers	Yes	Yes	Inspections, Maintenance	Outdoor Restaurant and bar	Following Storm Events	Building Owner	Monthly, Annually
Riverside Hotel (Weeding Venue)	R2734541990	2900 W. Chinden Blvd	BLDFY2017-0112	3	(2)Permeable Pavers, (1)seepage bed, (1)Catch Basin	Yes	Yes	Inspections, Maintenance	Outdoor Weeding Venue	Following Storm Events	Building Owner	Monthly, Biannually, Annually
ServePro	R1055420150	5090 Sawyer Ave.	BLD2013-00126	4	Swales	Yes	No	Inspections, Maintenance	Building Restoration	Following Storm Events	Serv Pro Property Manager	April and September
Sleep Country/ Mattress Firm	R8143000043	7227 State Street	BLD2014-00101	3	(1)Swale, (1)Catch Basin, Permeable Pavers	Yes	No	Inspections, Maintenance	Mattress Sales	Following Storm Events	Mattress Firm Owners	April and September
Subway Restaurant	R2734502490	3988 Chinden Blvd	BLD2013-00029	1	(1)DCI, (1)seepage bed	Yes	No	Inspections, Maintenance	Sandwich Restaurant	As Needed and Following large Storm	Bill Meier, Three Goats LLC.	2x annually
Tates Rents & Professional Concrete Co.	R2734502730	111 E. 39th Street	BLD2014-00100	2	Swales	No	No	Inspections, Maintenance	Office Building	Maintain as needed.	Grove Hummert	Semi-annually
Telaya Winery	R2734541570	240 E. 32nd Street	BLD2015-00063	1	(2)Swales	Yes	No	Inspections, Maintenance	Wine Manufacturing & Sales	Following Significant Rainfall Event	Teyala Winery Owners	monthly, biannual, Annually
The Human Bean	S0514346700	10015 State Street	BLD2015-00023	1	(2)Swales	Yes	No	Inspections, Maintenance	Coffee Drink bistro	Periodic Inspection	Human Bean Owners	Periodic Inspection
Trailwinds Apartments	R2734520991	415 E. 42nd Street	BLD2014-00099		Catch Basins, Swale	Yes	No	Inspections, Maintenance	Apartment Community	Following substantial storm events	Trail Winds Apts Owners - Maintenance Supervisor	April and September
Treasure Valley Collision	S0524244452	8421 State Street	BLD2014-00125	1	(1)Swale	Yes	No	Inspections, Maintenance	Auto Collision Repair	After Storm Event	Property Land Owner	Annually

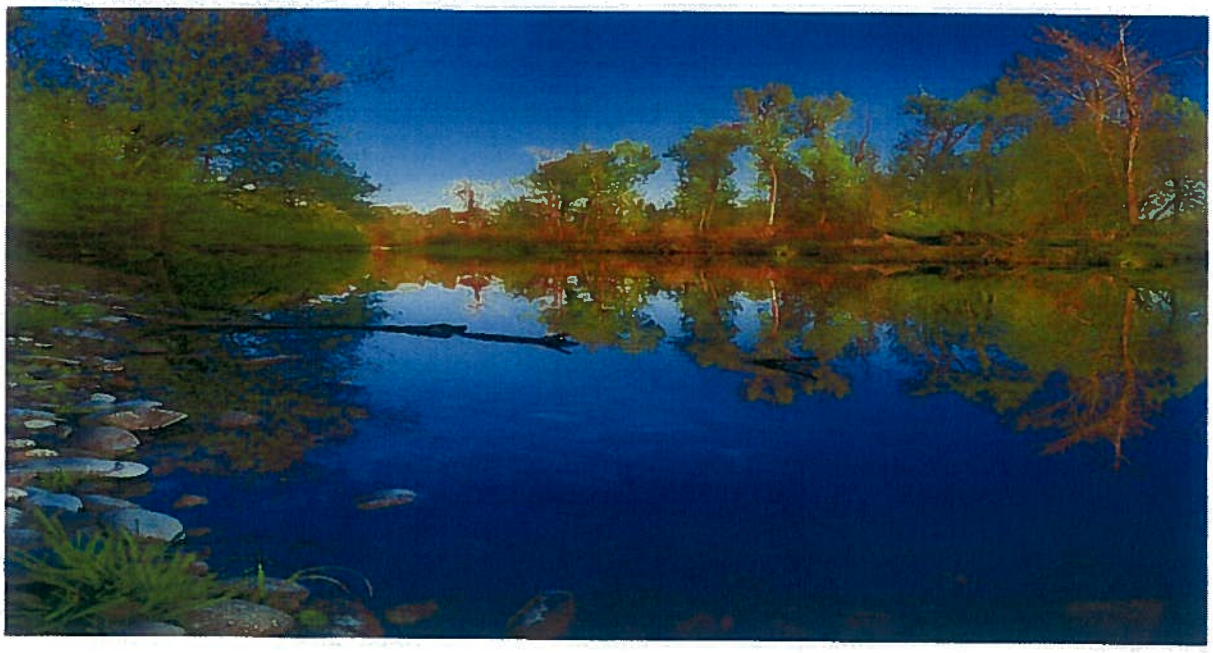
United Parcel Service (UPS) Trailer Staging Expansion Area	R2734501090	116 E 42nd Street	PWUFY2016-0005	1	(2)Swales	Yes	Yes	Inspections, Maintenance	Package Shipping Service	Routine Part of Grounds keeping Schedule	United Parcel Service	2x annually
Waterfront District Pool HOA	R9242370050	3600 Prospect Way	BLD2013-00070	1	DCI, seepage bed	No	Yes	Inspections, Maintenance	Community Swimming Pool	Following Storm Events	Waterpark Homeowners Assoc.	April, September, After Storms
Waterfront District Restaurant(Luciano's)	R8242370040	3588 N Prospect Way	BLDFY2016-0192	3	(1)1000 Oil/Sand DCI, (2)Swales, (1)Catch Basin	Yes	Yes	Inspections, Maintenance	Italian Restaurant/ Café	Following Storm Events	Property Owner	April and September
Westvet Emergency	R2039130020	5019 Sawyer	BLD2015-00091	2	DCIs, Swales, Pervious pavers	Yes	No	Inspections, Maintenance	Veterinarian Hospital	Following Significant Rainfall Event	Brourman Properties, LLC.	April and September
Wildflour Bakery	R2734501177	304 E. 42nd Street	BLD2015-00081	1	(1)Infiltration Basin	Yes	No	Inspect, maintain, clean	Cookie Bakery	Following Rain Event Greater than 0.5"	Mary Cogswell	April and September

Appendix F

Riparian Zone Management Project

Table of Contents

GARDEN CITY™
NESTLED BY THE RIVER



Riparian Zone Management Project

Riparian Zone Management Project

2015 Riparian Zone Management Plan

Introduction:

In order to address the 2015 Riparian Zone Management requirements for Boise area NPDES permit, Garden City is implementing a Riparian Zone Management Plan. The project will attempt to acquire and protect undeveloped areas of land in the riparian areas within the city limits of Garden City. The project will include mapping out the current city owned properties, and potential riparian area acquirable lands, and outlining the benefits to land owners and the necessary steps to acquiring and protecting the land.

Step 1: NPDES Requirements

The Co-Permittee requirements regarding Riparian Zone Management include the following: "Riparian Zone Management and Outfall: Riparian Zone Management... No later than September 30, 2015, the Permittees must identify and prioritize riparian areas appropriate for Permittee acquisition and protection... The Permittees must submit the list of prioritized riparian protection areas, and a status report on the planning... as part of the 3rd Year Annual Report."

Step 2: Mapping Riparian Zones and Potential Acquirable Lands

The riparian areas surrounding the Boise River, the Thurman Mill Canal, ponds, and lakes have been mapped out with our Arc Reader GIS program, and prioritized for potential areas of acquisition and protection. Garden City already owns substantial amounts of land in the riparian areas (see map – "City Owned Property"). Four riparian zones have been identified and prioritized for potential acquisition and protection (see map – "Potential Riparian Acquisition Zones"). Each of the potential zones has been mapped out with the appropriate land owner (see maps – "Potential Riparian Zones"). The maps in "Potential Riparian Zones" have had each property outlined and separated between land owners and

land that has no owners associated. There are numbers for each of the property owners in the riparian zones (see document "Potential Land Donors").

Step 3: Research

A general plan for acquisition and protection of the land has been developed. More research and development of the plan will be done as time goes on. The current plan is to be submitted into the 2015 Stormwater Management Plan and it includes steps to be implemented to reach the goals of the Riparian Zone Management Project. A tenative implementation timeline with individual goals has been made (see document "Riparian Zone Management Project Timeline"). Many Cities, counties, states, nonprofit and private organizations have implemented similar plans to acquire lands. Researching existing riparian zone plans will help with the development of our plan. Funding will need to be provided for land that is to be purchased. Research will need to be done to see how funding would be provided. Municipality funds, grants, and donations are possible funding sources.

Step 4: Acquisition Methods

Three types of land acquisition are fee simple acquisition, conservation easement, and municipality ordinance buffer tools.

Fee simple acquisition is the purchase, trade or donation of land. Using this method would allow the City to gain full ownership of the land. Funding would need to be acquired if purchase of lands is to be possible. It is also possible to trade land that is owned by the city that is not located in a riparian zone or does not have economic value for the city for land owned by a private party that is located in a riparian zone.

Land owners who donate land to the City could receive a substantial tax benefit. Tax benefits for donors could be used under Idaho State Tax Code: Tile 63 (Revenue and Taxation), Chapter 6 (Exemption from Taxation) titled "63-605: LAND USED TO PROTECT WILDLIFE AND WILDLIFE HABITAT".

A conservation easement would make an agreement between land owners and the City of Garden City. The agreement would ensure permanent protection from development of the land. The agreement would allow the owners to continue to own and use the land with certain restrictions. Each easement would be unique to the parcel of land and would address each parcel individually.

Conservation Easement agreements would allow the land owners to continue to enjoy the land, and continue to be the primary owner(s) of the land. The agreements would give the owners the assurance that the land would never be developed as long as the agreement is in play. All maintenance, damage, and liability concerns of this land will remain the responsibility of the land owner. Each easement agreement would need to be individually written to accommodate to each parcel of land. General language could be developed to be included on each of the agreements. A "sample agreement" would be developed to show the land owners when contacting the land owners and discussing the acquisition processes and types.

Municipality ordinance buffer tools involves using established city ordinances to acquire lands that either have no owner associated, or are currently owned by private people, or organizations. The land could be acquired through Garden City Development Code 8–6B-10: Zoning Map Amendment and Annexation. This Municipal Code gives the city the authority to use the Idaho State Code 50-222: Annexations by Cities. More research would need to be done in order to determine if the targeted riparian zones would qualify for this State code, and the steps that would need to be taken for implementation.

Step 6: Contacting Landowners:

Brochures, handouts, flyers, sample agreements, etc. would be developed as educational materials containing information about the benefits of donating, selling, or reaching an easement agreement on their land.

Each landowner on the list of "Potential Land Donors" would be approached with the plan, educational materials, and benefits. A list of interested parties would be developed from the meetings with the land owners. Agreements and contracts would then be developed and signed by each party. After all documentation has been prepared and signed, the city would take over ownership and responsibilities.

Step 7: Implementation

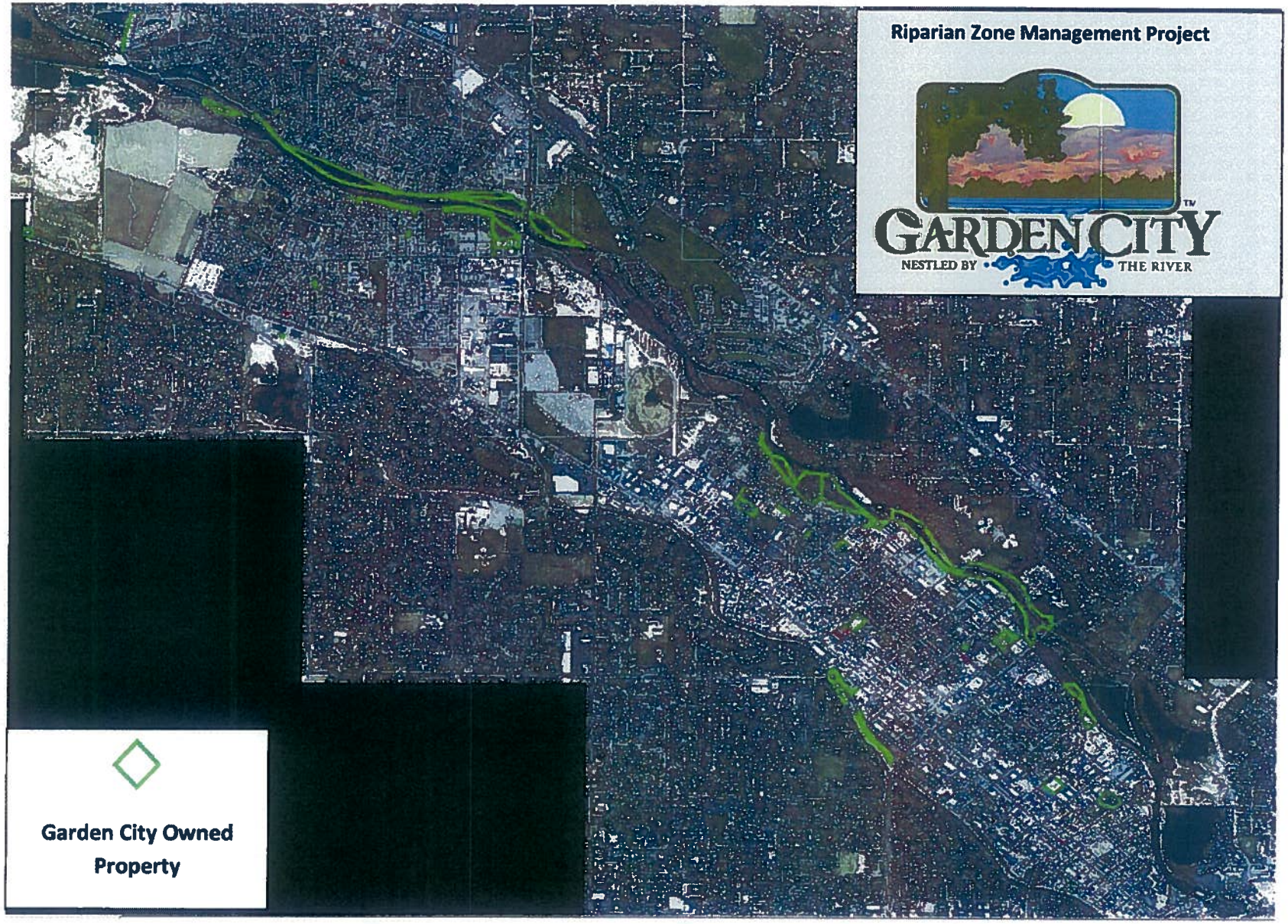
Land that will be donated, sold, or acquired via City ordinance, would be the cities property to protect and maintain. The goal of the riparian zone is to allow it to remain in its natural state, and allow wildlife to flourish within and manipulate as needed. Therefore there will be little to no maintenance required. Control measures would need to be developed in order to ensure the land is not destroyed by an outside party. The land would need to be inspected routinely to check for damage and liability concerns. For the most part the land could remain untouched.

Land that is under a conservation easement would not be the responsibility of the city. The agreements would need to be kept track of by the Garden City Developmental Services Department. When / if plans come through for development on these parcels of land, they would automatically be rejected.

Conclusion

The mapping out and prioritizing lands, as well as writing this plan will fulfill the requirements of the NPDES permit for Garden City. Implementation of the plan would be self initiated. Project goals, a timeline and deadlines have been made, and will be updated once implementation is approved.

This project will not only satisfy requirements for the Garden City portion of the NPDES permit, but also it would benefit wildlife, environment, recreation, and human health. Implementation would help the Cities reputation improve, and allow citizens to recognize that the City cares about preserving natural riparian habitats.


Riparian Zone Management Project
GARDEN CITY
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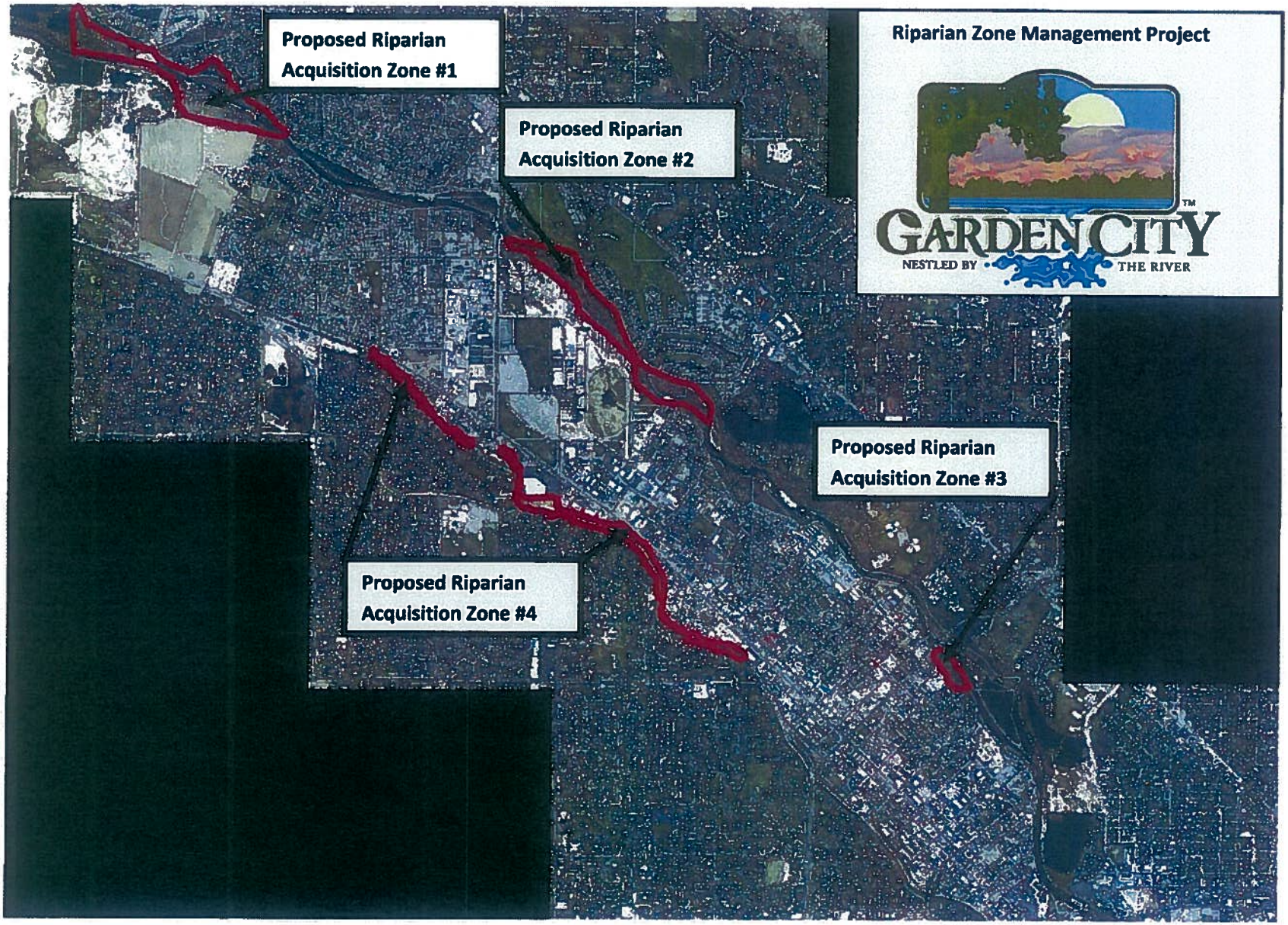
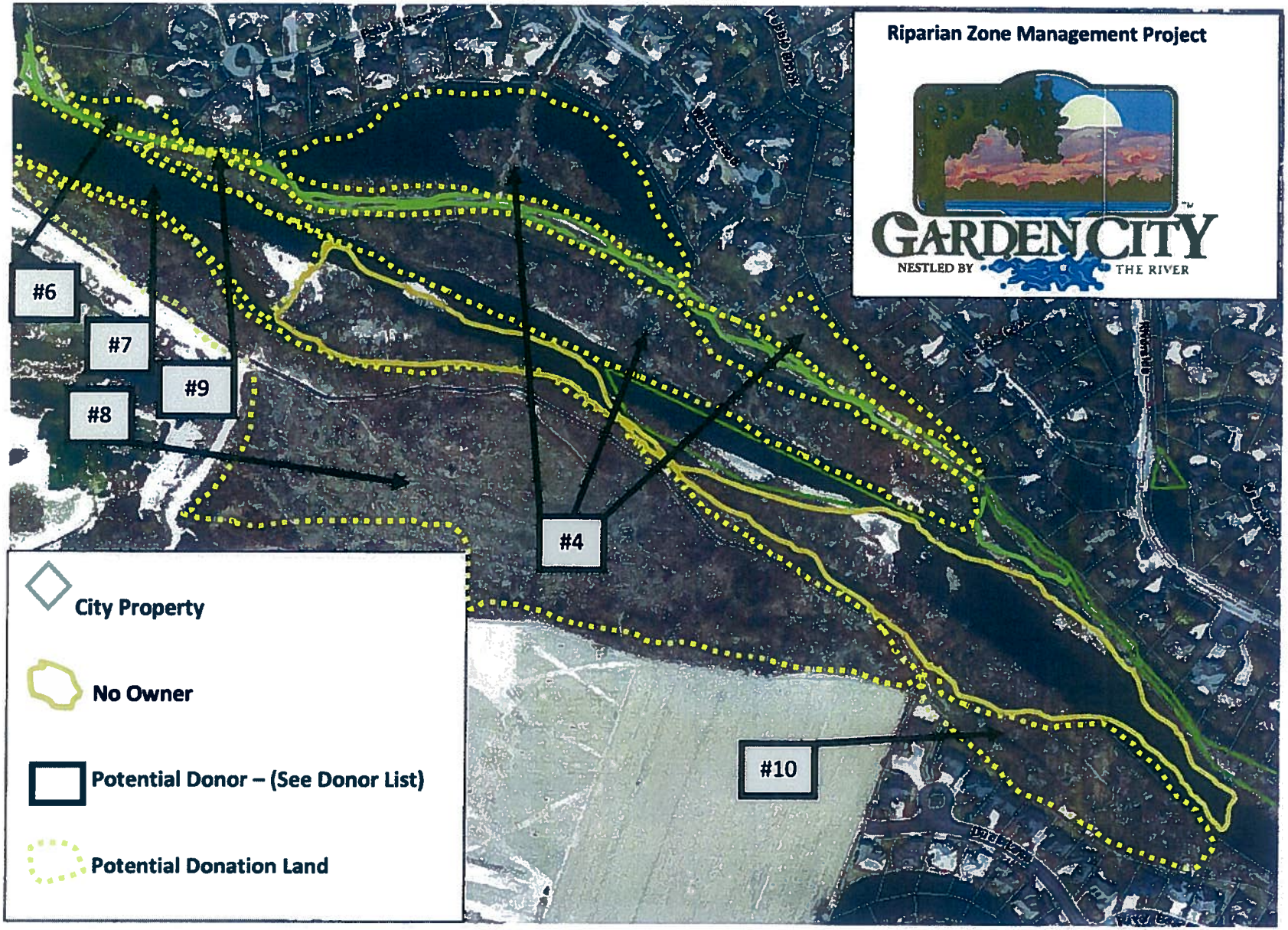
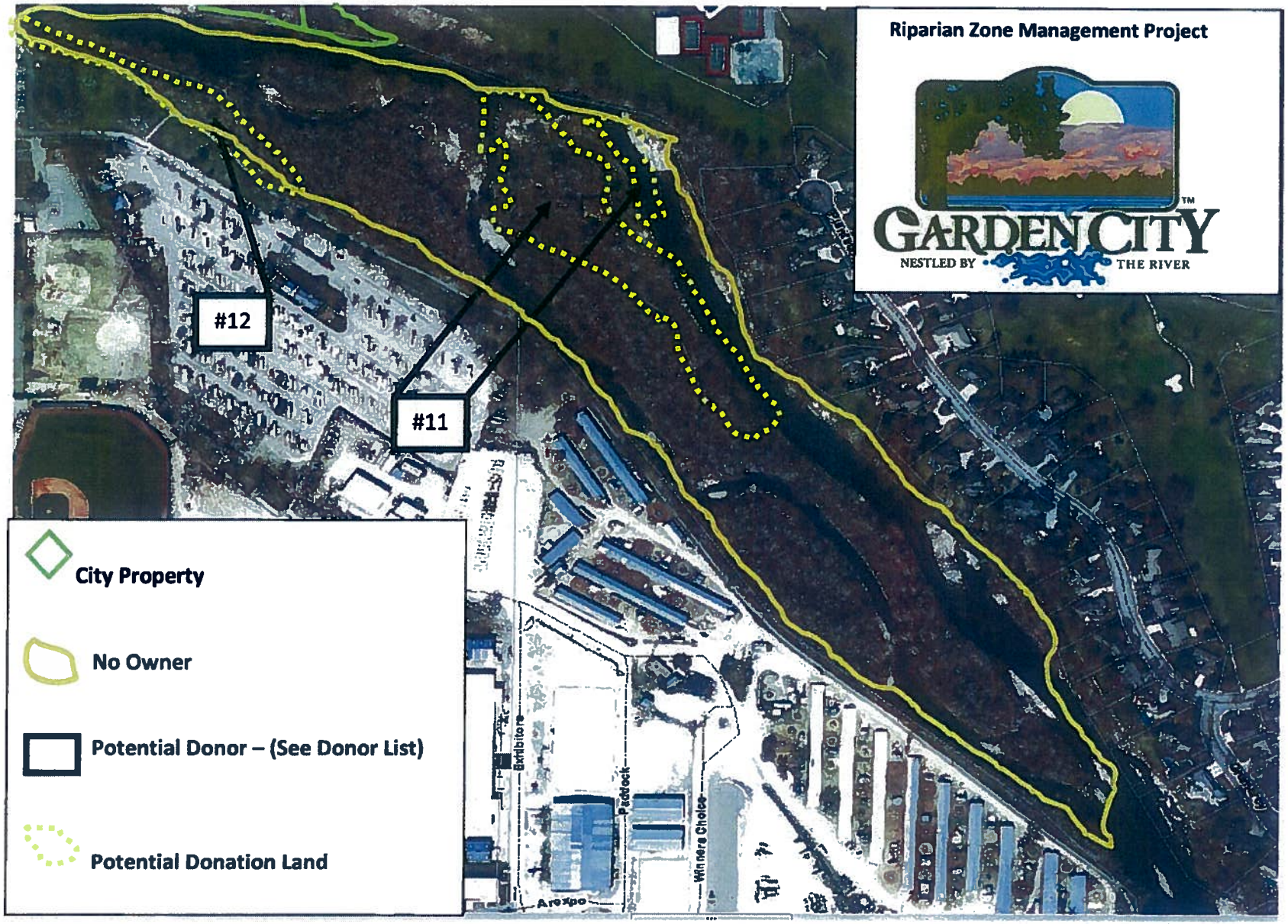
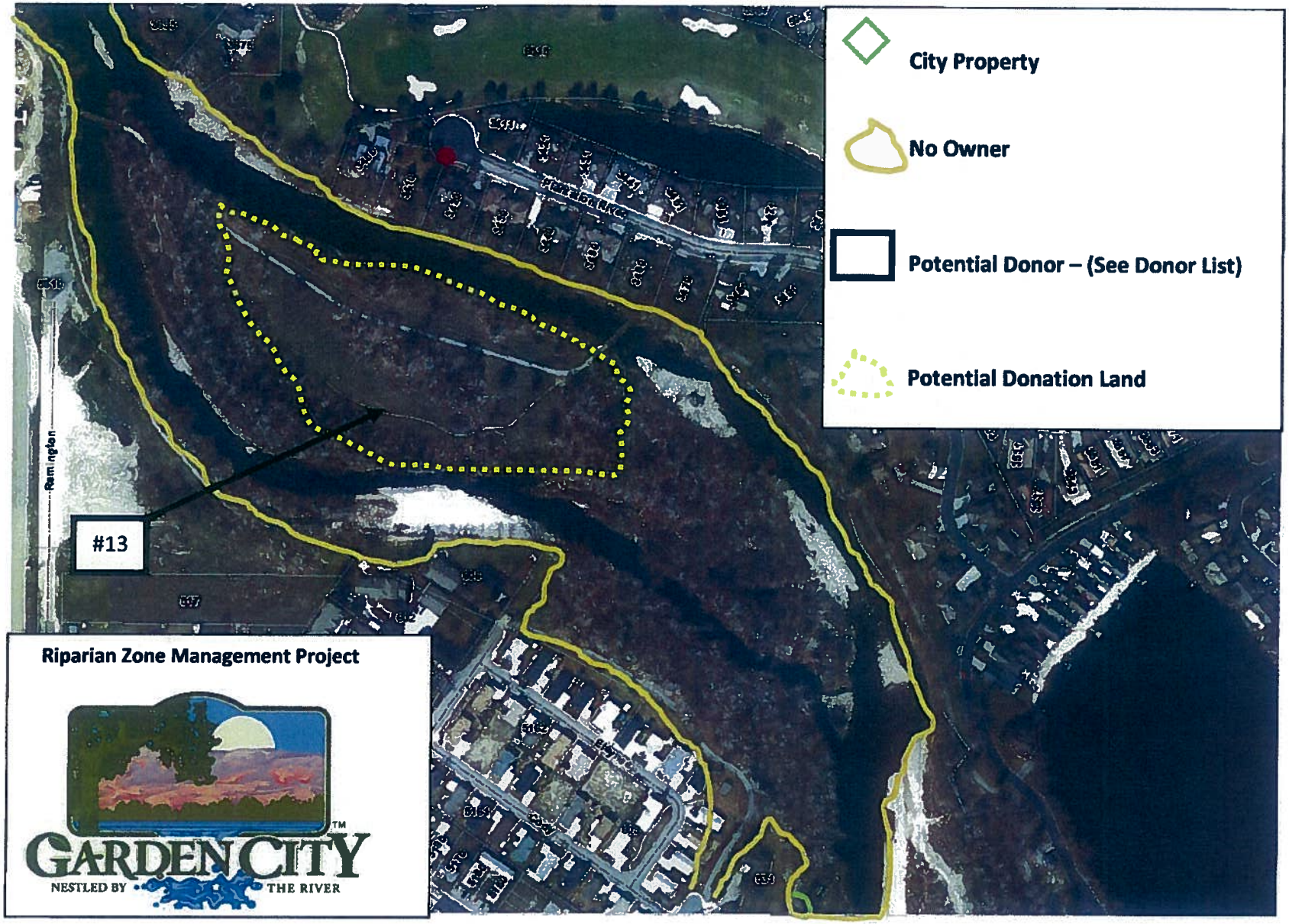
Garden City Owned Property

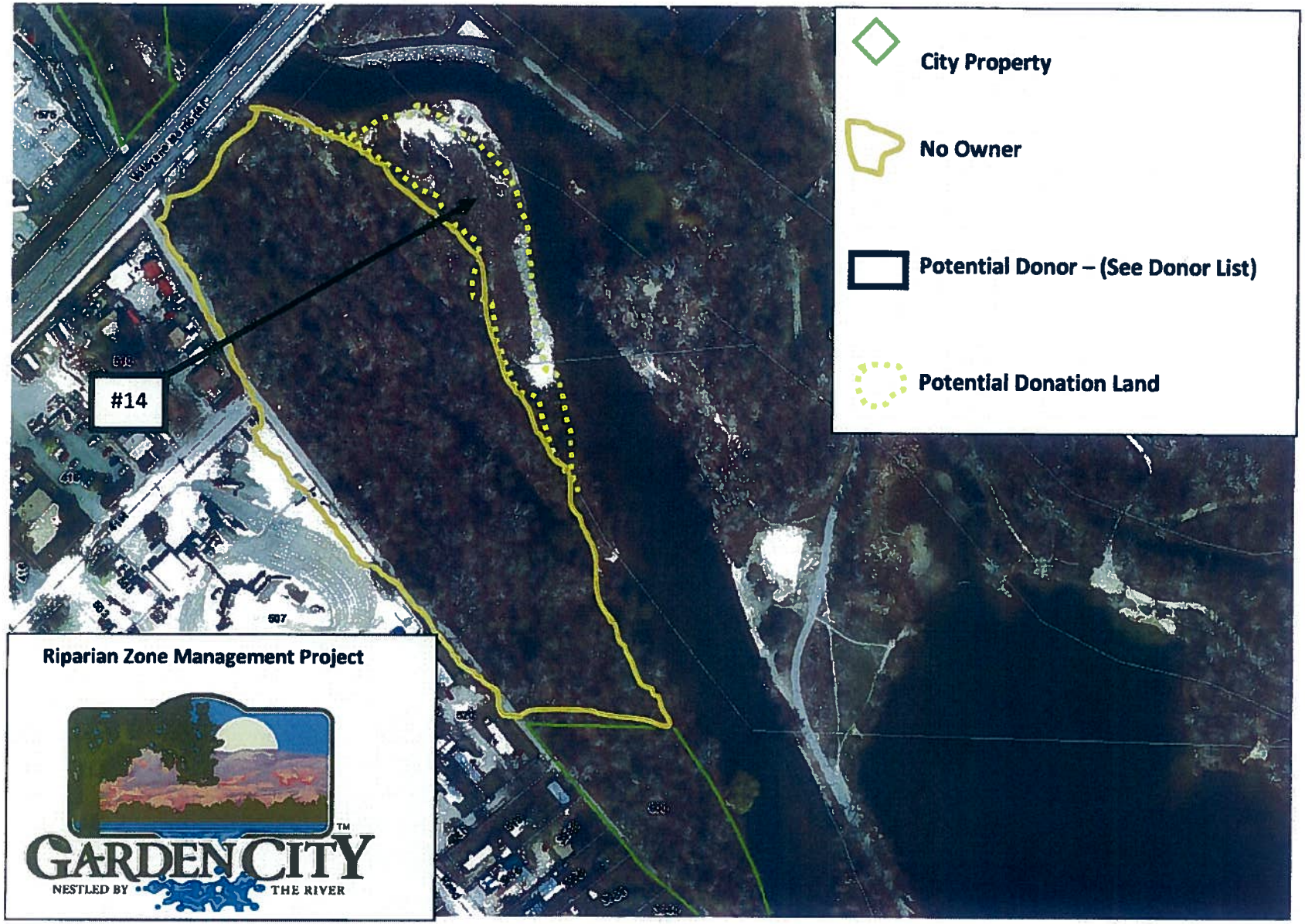

Proposed Riparian Acquisition Zone #1
Proposed Riparian Acquisition Zone #2
Proposed Riparian Acquisition Zone #3
Proposed Riparian Acquisition Zone #4
Riparian Zone Management Project
GARDEN CITY
NESTLED BY THE RIVER

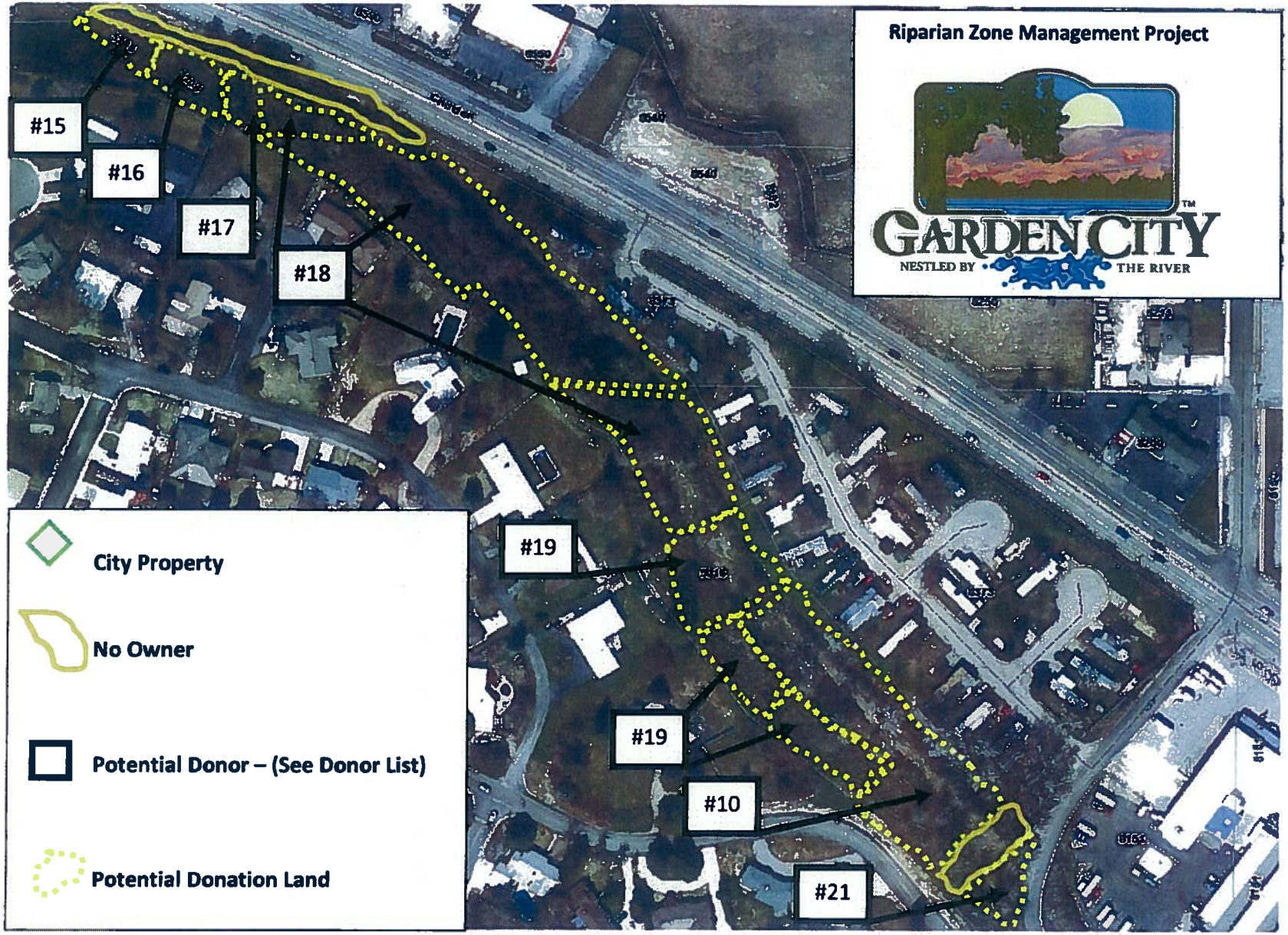

Riparian Zone Management Project
GARDEN CITY
NESTLED BY THE RIVER
City Property
No Owner
Potential Donor – (See Donor List)
Potential Donation Land
#1
#2
#3
#4
#5
#6
#7
#8

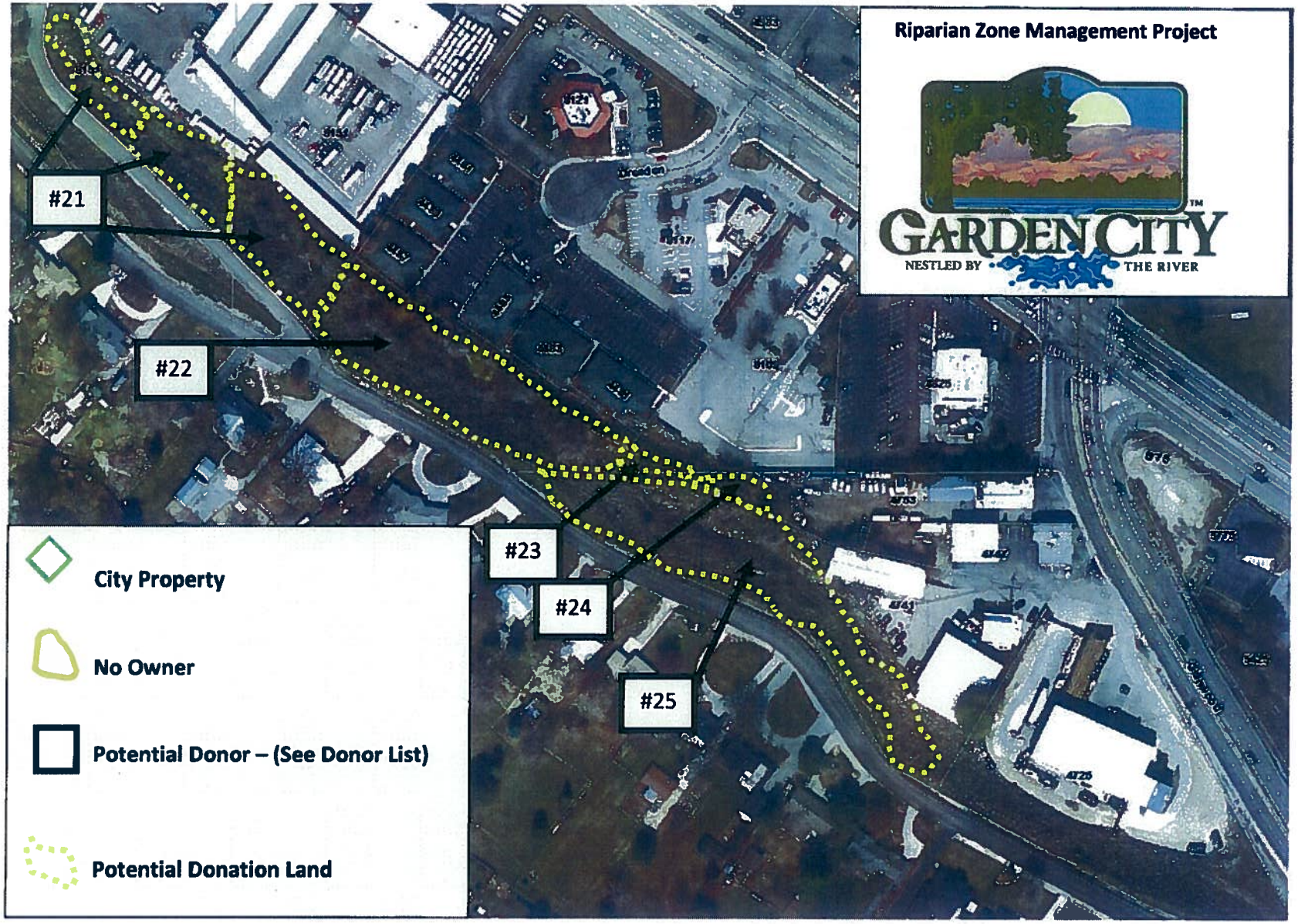

Riparian Zone Management Project
GARDEN CITY
NESTLED BY THE RIVER
#6
#7
#8
#9
#4
#10
City Property
No Owner
Potential Donor – (See Donor List)
Potential Donation Land

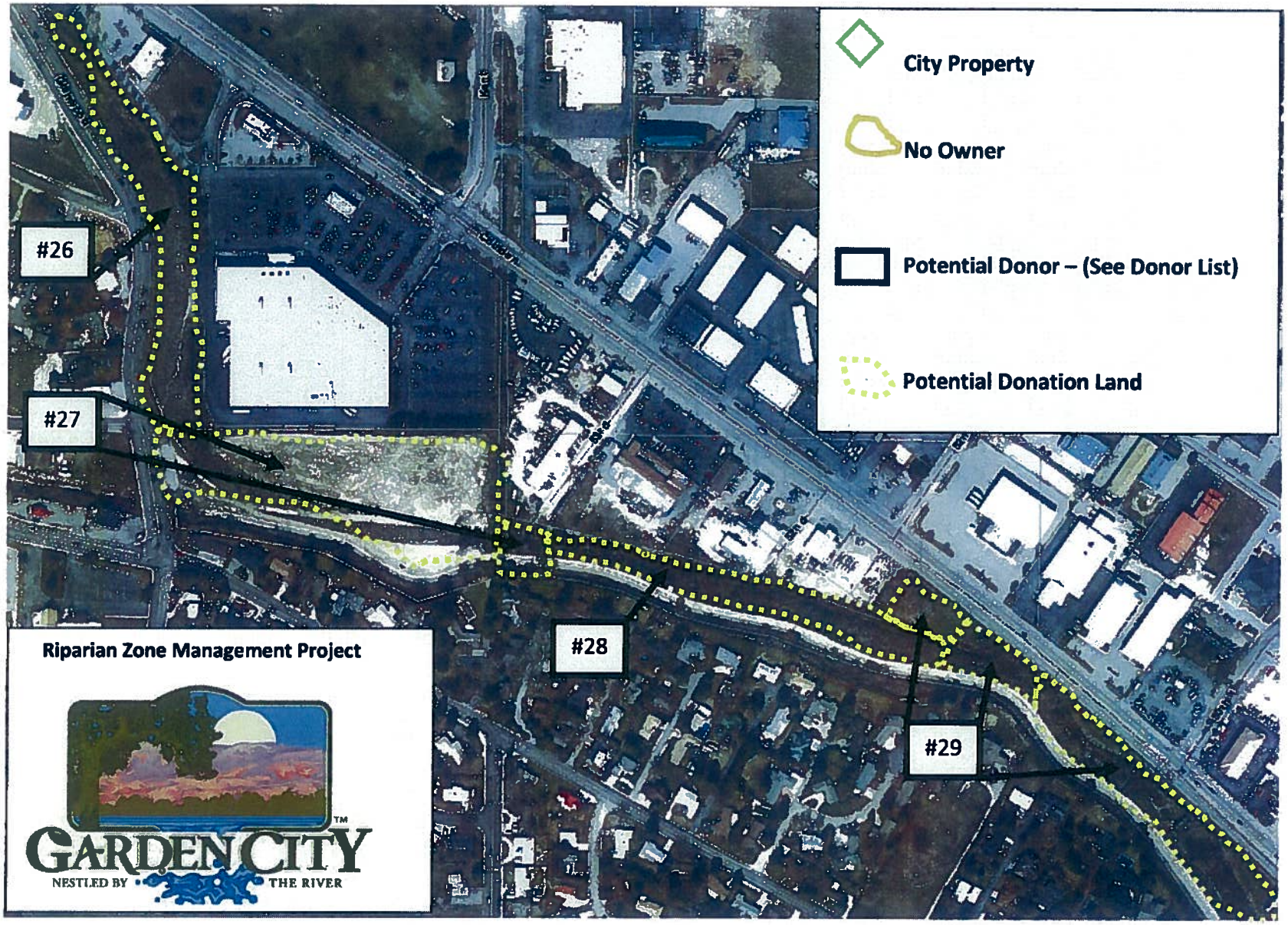

Riparian Zone Management Project
GARDEN CITY
NESTLED BY THE RIVER
#12
#11
City Property
No Owner
Potential Donor – (See Donor List)
Potential Donation Land
Exhibitors
Paddock
Winners Choice
Arexpo

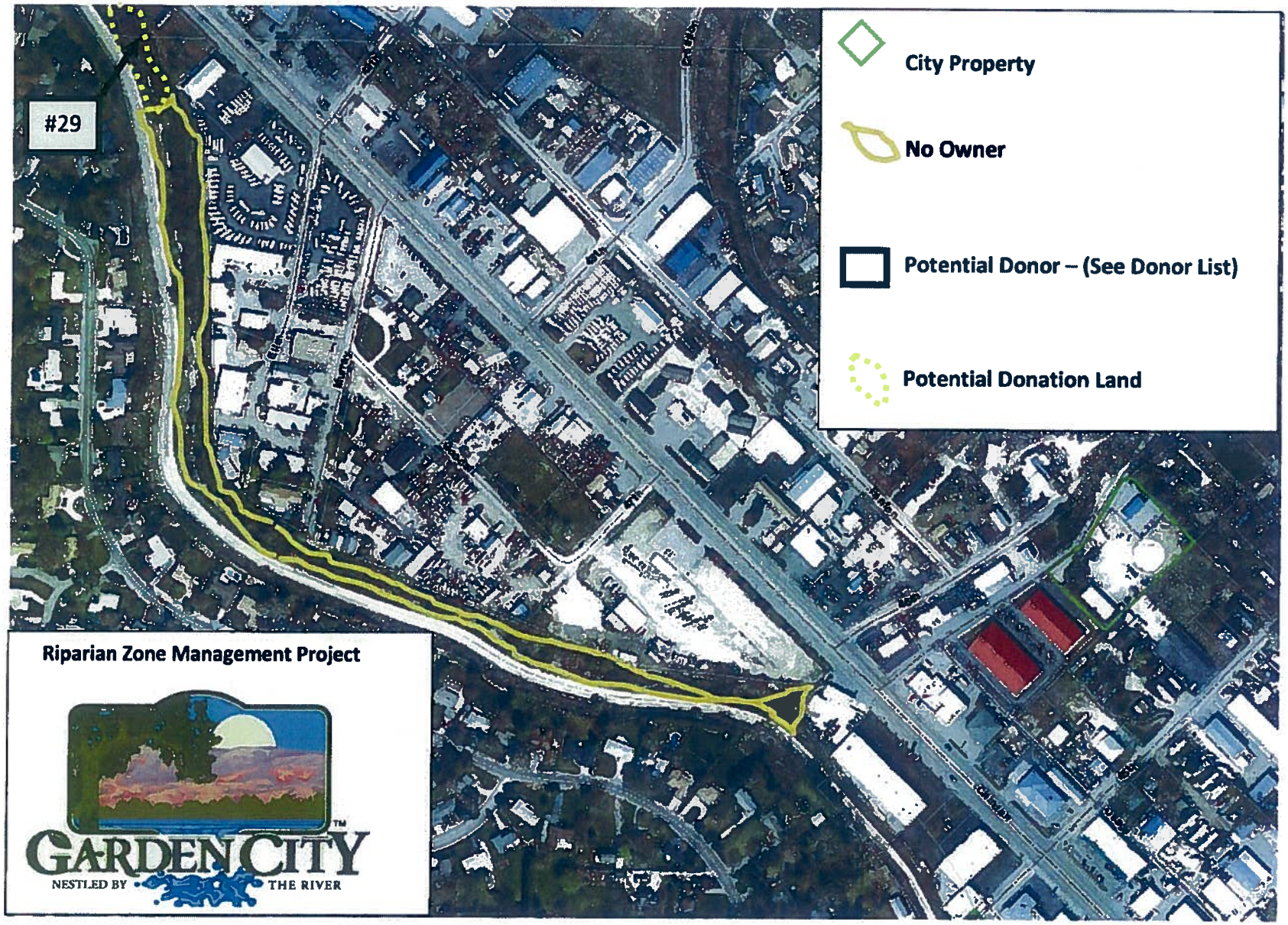

City Property
No Owner
Potential Donor – (See Donor List)
Potential Donation Land
#13
Remington
Riparian Zone Management Project
GARDEN CITY
NESTLED BY THE RIVER


City Property
No Owner
Potential Donor – (See Donor List)
Potential Donation Land
#14
Riparian Zone Management Project
GARDEN CITY
NESTLED BY THE RIVER

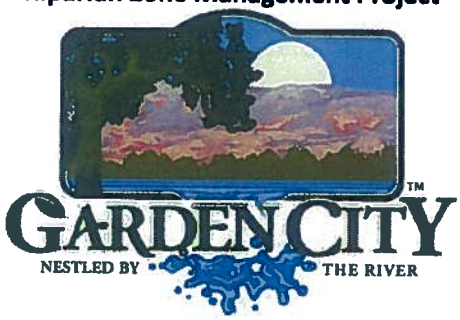

Riparian Zone Management Project
GARDEN CITY
NESTLED BY THE RIVER
#15
#16
#17
#18
#19
#19
#10
#21
City Property
No Owner
Potential Donor – (See Donor List)
Potential Donation Land


Riparian Zone Management Project
GARDEN CITY
NESTLED BY THE RIVER
#21
#22
#23
#24
#25
City Property
No Owner
Potential Donor – (See Donor List)
Potential Donation Land


City Property
No Owner
Potential Donor – (See Donor List)
Potential Donation Land
#26
#27
#28
#29
Riparian Zone Management Project
GARDEN CITY
NESTLED BY THE RIVER


#29
City Property
No Owner
Potential Donor – (See Donor List)
Potential Donation Land
Riparian Zone Management Project
GARDEN CITY
NESTLED BY THE RIVER

Riparian Zone Management Project



Potential Land Donors

Riparian Zone #1:

1. Catherine Martin
2. Tim Hill
3. Christopher Pearson
4. Woods Owner Association Inc.
5. Samuel Jorgenson
6. Raol Kakaria
7. Dean Schultz
8. Dechambeau Family LTD Partnership
9. Roger Allen
10. Huskinson-Leader LLC

Riparian Zone #2:

11. Idaho State Department of Lands
12. Ada County
13. Idaho Park Foundation

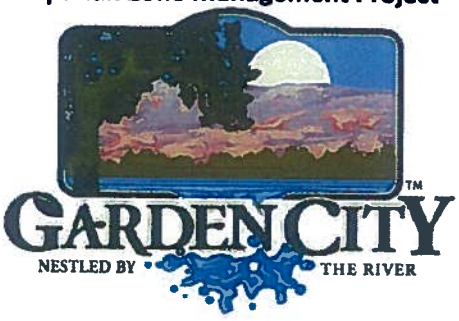
Riparian Zone #3:

14. Idaho State Parks and Recreation

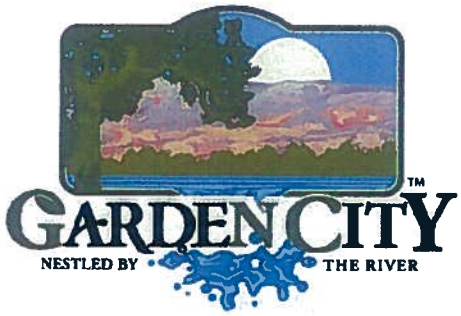
Riparian Zone #4:

15. Kirk Sullivan
16. Edward Bews
17. Blessin Barry
18. Larry Barnes
19. Dale Fiske
20. Wayland Fong
21. Arec 11 LLC
22. Creeks Edge Partnership
23. Norman Mattefs
24. TDJ LLC
25. Glenwood Zamzows LLC

Riparian Zone Management Project



26. **Metropolitan Life**
27. **James Fuhrman**
28. **Walter Guillen**
29. **TLC Properties Inc**



Riparian Zone Management Project Timeline

Goal	Target Date
1. NPDES Requirements a. List of acquirable lands b. Plan for implementation	**September 30, 2015**
2. Prioritized Riparian Land a. Map and list potential acquirable lands	**September 30, 2015**
3. Develop Riparian Zone Management Plan and Report Staus a. Plan for implementation with steps	**September 30, 2015**
4. Research a. Other cities, counties, states, nonprofit organizations, etc. plans b. Specific steps for each type of acquisition c. Purchase funding	**TBA**
5. Develop Materials for Land Owners a. Educational materials, benefits b. Sample easement agreements c. Sample purchase agreement d. Sample trade agreement e. Sample donation agreement f. Tax benefits	**TBA**
6. Approach Land Owners a. Develop list of donors for each type of acquisition	**TBA**
7. Develop Contracts a. Work with land owners b. Sign agreements	**TBA**
8. Acquire Land/ Implementation a. Take over ownership b. Implement agreements c. Implement land management plans	**TBA**

Appendix G

Inventory of Garden City Facilities and Stormwater Structures

Table of Contents:

Garden City Structure Control and Maintenance Map

1. Animal Control Facility. **2.** Boys and Girls Club of ADA County. **3.** City Hall. **4.** Heron Park/Senior Center. **5.** Parking Lot 36th Street. **6.** Police Department. **7.** Public Works Operations 38th Street. **8.** Public Works Storage Facility. **9.** Riverfront Park. **10.** Riverside Pond. **11.** Riverpointe Drive. **12.** Waterfront Park

Stormwater Pollution Prevention Plan

for:

Garden City Public Works Operations Center
207 E. 38th St
Garden City, Idaho 83714
208-472-2949

SWPPP Contact(s):

Kevin Wallis
Environmental Manager
207 E. 38th St
Garden City, Idaho 83687
208-472-2949 X 116
Kwallis@gardencityidaho.org

SWPPP Preparation Date:

9/ 15 / 2015

Contents

Table of Contents

SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION.

1.1 Facility Information.

Facility Information

Name of Facility: Garden City Public Works Operations Center

Street: 207 E. 38th St.

City: Garden City State: ID ZIP Code: 83714

County or Similar Subdivision: Ada

NPDES ID (i.e., permit tracking number): IDS-027561

Discharge Information

Does this facility discharge stormwater into a municipal separate storm sewer system (MS4)? ☐Yes X No

1.2 Contact Information/Responsible Parties.

Facility Operator(s):

Name: Colin Schmidt – Public Works Director
Address: 207 E. 38th St
City, State, Zip Code: Garden City, ID 83714
Telephone Number: 208-472-2049 X 103
Email address: cschmidt@gardencityidaho.org

Facility Owner:

Name: City of Garden CIty
Address: 6015 Glenwood Blvd
City, State, Zip Code: Garden City, ID 83714
Telephone Number: 208-472-2100

SWPPP Contact(s):

SWPPP Contact Name (Primary): Kevin Wallis – Environmental Manager
Telephone number: 208-472-2949 x 116
Email address: kwallis@gardencityidaho.org

SWPPP Contact Name (Backup): Zach Conde – Environmental Specialist
Telephone number: 208-472-2949 x 118
Email address: zconde@gardencityidaho.org

1.3 Stormwater Pollution Prevention Team.

Staff Names	Individual Responsibilities
Kevin Wallis - Environmental Manager	SWPPP plan development and implementation – Staff Training – Lead Emergency HAZMAT Response Coordinator
Zach Conde – Environmental Specialist	Assists Environmental Manager and fills in for Environmental Coordinator in his absence
Troy Vaughn – Collection Systems & Construction Manager	Staff Training – Deployment and Maintenance of required BMP's
Chas Heaton – Water Manager	Staff Training – Deployment and maintenance of required BMP's
Dallas Yergenson – Parks & Facilities Manager	Staff Training – Deployment and maintenance of required BMP's

1.4 Site Description.

"Industrial Activities" conducted at this facility are as follows:

A. Outdoor Activities
   1. Construction Material Storage – small amounts
   2. Fleet Vehicle Parking
   3. Heavy Equipment storage

B. Indoor Activities
   1. Chemical storage – small quantity/small container
   2. Parts storage
   3. Light vehicle maintenance

1.5 General Location Map.

The general location map for this facility can be found in Attachment A.

1.6 Site Map.

The site map for this facility can be found in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES.

2.1 Potential Pollutants Associated with Industrial Activity.

Industrial Activity	Associated Pollutants
Outdoor Fleet Vehicle and Heavy Equipment Parking	Potential leaking of automotive type liquids ie oils & coolants

2.2 Spills and Leaks. Areas of Site Where Potential Spills/Leaks Could Occur

Location	Discharge Points
Outdoor Fleet Vehicle and Heavy Equipment Parking	Potential leaking of automotive type liquids ie oils & coolants

SECTION 3: STORMWATER CONTROL MEASURES.

3. 1 Minimize Exposure.

No chemicals in any quantity are stored outside. Scrap metals, trash and recyclables are stored in covered bins.

3. 2 Good Housekeeping.

1. Scrap metal bins are emptied as needed.
2. Sanitary waste bins are emptied weekly.
3. Recycling bins are emptied every 2 weeks.

3.3 Maintenance.

1. Weekly vehicle inspections are performed on each of the fleet vehicles.
2. Drip pans are deployed any time dripping is observed.
3. Routine maintenance, and repairs are done off site at various automotive facilities.

3.4 Spill Prevention and Response.

1. All staff is trained annually on spill prevention and response procedures.
2. Each fleet vehicle is equipped with a spill kit.

3.5 Erosion and Sediment Controls.

1. All soils have been stabilized with a top layer of gravel, a sidewalk and a small concrete pad.
2. The velocity of the non absorbed run off from front lot will be slowed by gravel and very low gradient sloping towards the street.

3.6 Management of Runoff.

1. The flat surface of the gravel lot greatly reduces stormwater runoff.
2. Gravel is distributed throughout the lot.

3.7 Dust Generation and Vehicle Tracking of Industrial Materials.

Gravel on top holds down soil and reduces tracking.

SECTION 4: SCHEDULES AND PROCEDURES.

4.1 Good Housekeeping.

1. Vehicles are inspected weekly.
2. Sanitary waste bins are emptied weekly.
3. Recycle bins are emptied every 2 weeks.
4. Scrap metal bins are emptied as needed.
5. Small spills/leaks are cleaned up immediately.

4.2 Maintenance.

1. Weekly vehicle inspections.
2. Fleet vehicles are taken off site for all maintenance work.
3. Weekly sanitary waste pick up.
4. Scrap metal pick up as needed.

4.3 Spill Prevention and Response Procedures.

1. Each fleet vehicle is equipped with a spill kit. Supplies from this kit can be deployed to soak any minor spills, drips or leaks.
2. The facility has drip pans which can also be deployed in the event of leaking, spilling or dripping.

4.4 Employee Training.

Garden City Public Works staff is trained annually on stormwater codes, pollutant identification, and BMPs.

4.5 Facility Inspection

4.5.1 Routine Facility Inspections

Visual inspection conducted a minimum of annually to ensure draining properly. Write report, issue work orders when necessary, and include in annual report.

4.5.2 Quarterly Visual Inspections

A. Person(s) or positions of person(s) responsible for inspection.

1. Kevin Wallis
2. Zach Conde

B. Schedules for conducting inspections.

A minimum of annually

C. List areas where industrial materials or activities are exposed to stormwater.

1. Fleet vehicle parking
2. Scrap metal bin storage
3. Sanitary waste bin storage
4. Utility construction materials

D. List areas identified in the SWPPP (section 1 of the SWPPP Template) and any others that are potential pollutant sources (see Part 5.2.3).

Vehicle and heavy equipment leaking of oils and coolants etc.

E. Inspection information for discharge points.

One drop inlet in 38th street - 116°14'31.947"W 43°37'40.333"N

F. Other site-specific inspection objectives.

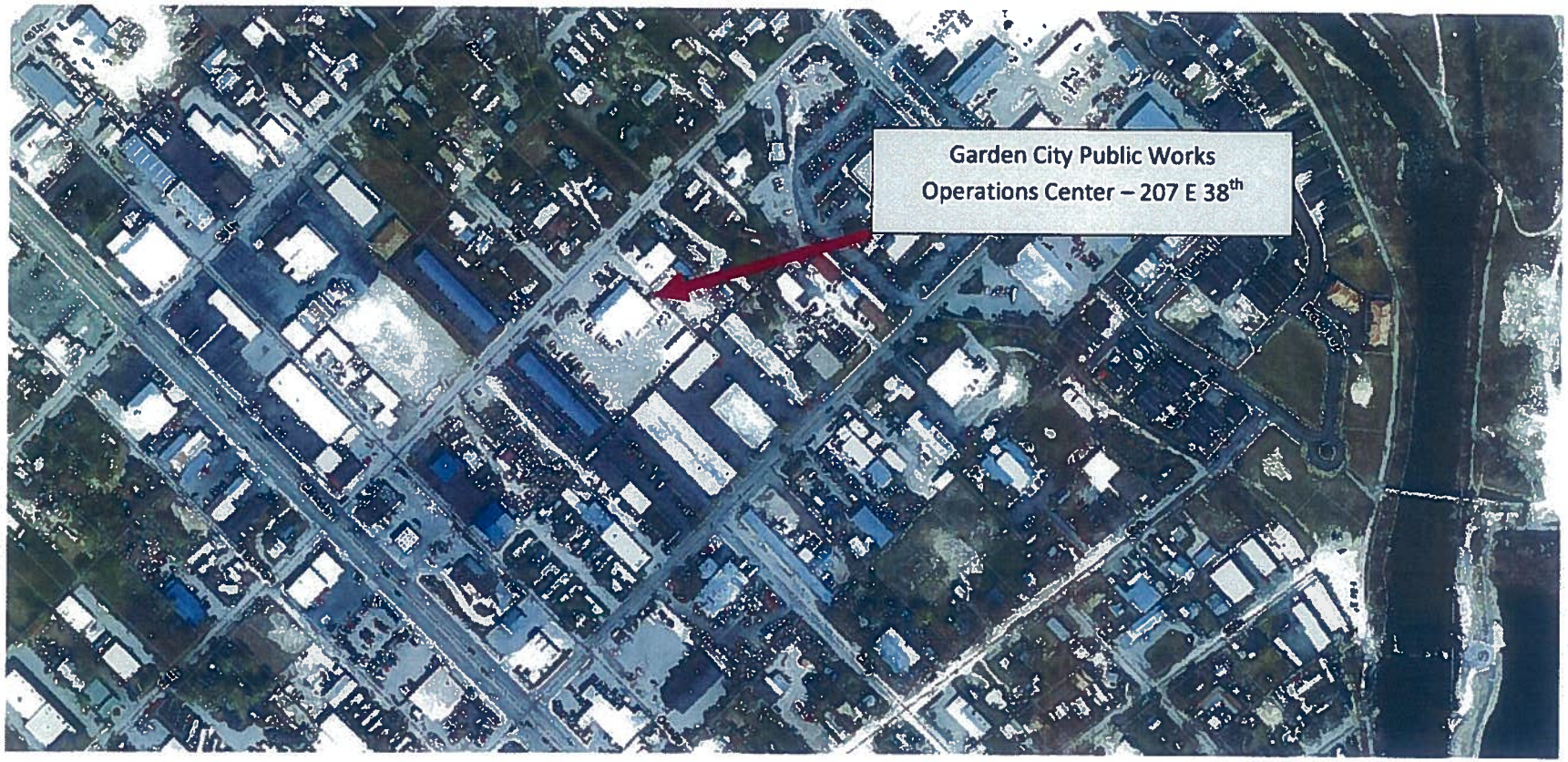
Visual inspection to ensure drainage is adequate.

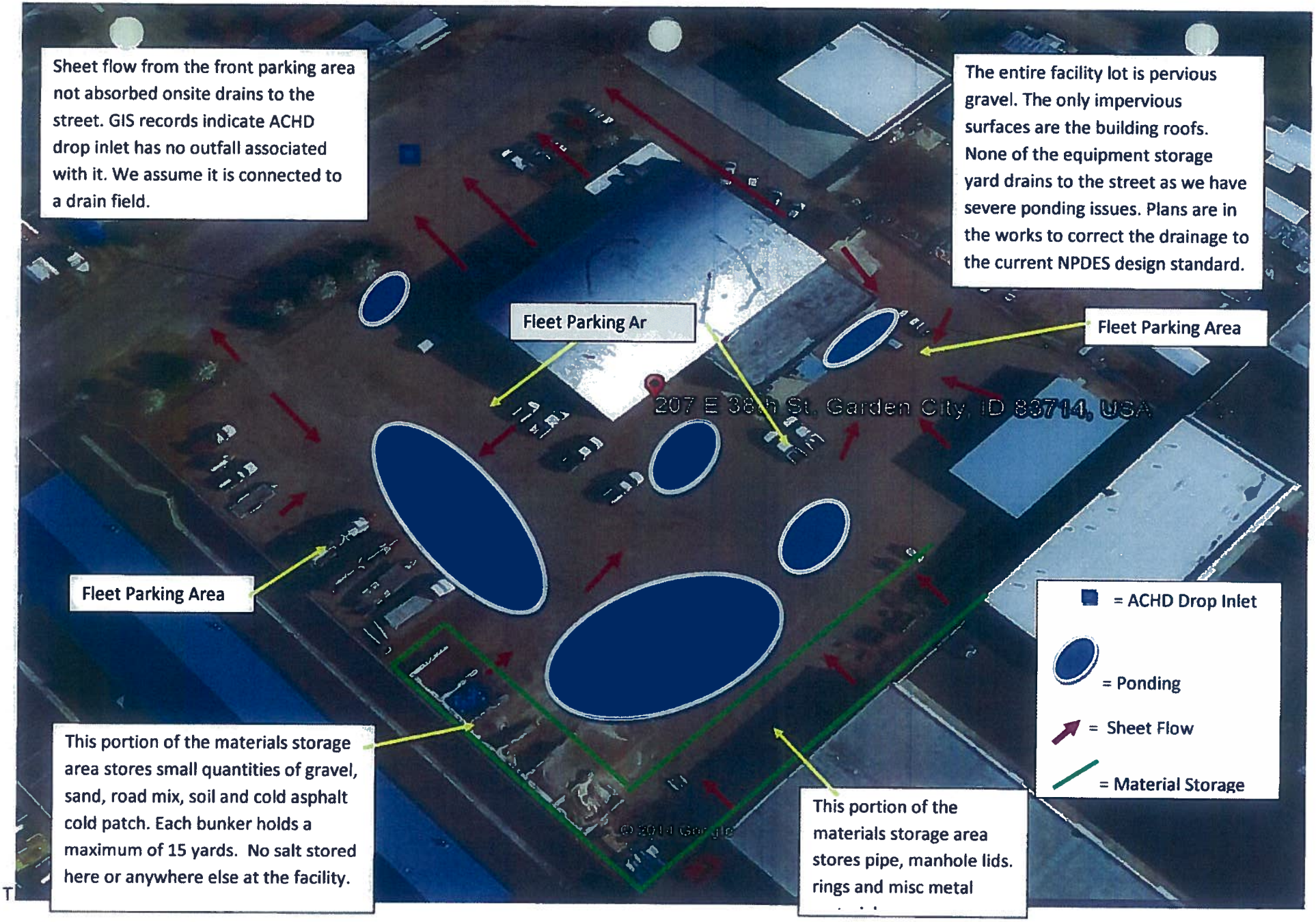
SWPPP ATTACHMENTS

Attachment A – General Location Map

Attachment B – Site Map

APPENDIX - A





APPENDIX B - Public Works Operations Center – 207 East 38th Street

Stormwater Pollution Prevention Plan

for:

Garden City 46th Street Storage Facility
165 E. 46th St
Garden City, Idaho 83714
208-472-2949

SWPPP Contact(s):

Kevin Wallis
Environmental Manager
207 E. 38th St
Garden City, Idaho 83687
208-472-2949 X 116
Kwallis@gardencityidaho.org

SWPPP Preparation Date:

9/ 23 / 2015

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Table of Contents

SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION.

1.1 Facility Information.

Facility Information

Name of Facility: Garden City 46th Street Storage Facility

Street: 165 E. 46th St.

City: Garden City _____ State: ID____ ZIP Code: 83714

County or Similar Subdivision: Ada

NPDES ID (i.e., permit tracking number): IDS-027561

Discharge Information

Does this facility discharge stormwater into a municipal separate storm sewer system (MS4)? ☐Yes X No

1.2 Contact Information/Responsible Parties.

Facility Operator(s):

Name: Colin Schmidt – Public Works Director
Address: 207 E. 38th St
City, State, Zip Code: Garden City, ID 83714
Telephone Number: 208-472-2049 X 103
Email address: cschmidt@gardencityidaho.org

Facility Owner:

Name: City of Garden CIty
Address: 6015 Glenwood Blvd
City, State, Zip Code: Garden City, ID 83714
Telephone Number: 208-472-2100

SWPPP Contact(s):

SWPPP Contact Name (Primary): Kevin Wallis – Environmental Manager
Telephone number: 208-472-2949 x 116
Email address: kwallis@gardencityidaho.org

SWPPP Contact Name (Backup): Zach Conde – Environmental Specialist
Telephone number: 208-472-2949 x 118
Email address: zconde@gardencityidaho.org

1.3 Stormwater Pollution Prevention Team.

Staff Names	Individual Responsibilities
Kevin Wallis - Environmental Manager	SWPPP plan development and implementation – Staff Training – Lead Emergency HAZMAT Response Coordinator
Zach Conde – Environmental Specialist	Assists Environmental Manager and fills in for Environmental Coordinator in his absence
Troy Vaughn – Collection Systems & Construction Manager	Staff Training – Deployment and Maintenance of required BMP's
Chas Heaton – Water Manager	Staff Training – Deployment and maintenance of required BMP's
Dallas Yergenson – Parks & Facilities Manager	Staff Training – Deployment and maintenance of required BMP's

1.4 Site Description.

"Industrial Activities" conducted at this facility are as follows:

A. Outdoor Activities
   1. Heavy equipment temporary parking.
   2. Fleet vehicle temporary parking.
   3. Loading of light equipment, tools, and materials.

B. Indoor Activities
   1. Parks, facilities, and construction equipment and materials storage.
   2. Parts storage.
   3. Chemical storage.
   4. Light equipment maintenance and storage.
   5. Heavy equipment storage.

1.5 General Location Map.

The general location map for this facility can be found in Attachment A.

1.6 Site Map.

The site map for this facility can be found in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES.

2.1 Potential Pollutants Associated with Industrial Activity.

Industrial Activity	Associated Pollutants
Outdoor fleet vehicle, and temporary heavy equipment parking	Potential leaking of automotive type liquids ie oils & coolants
Loading of light equipment and materials	Potential leaking of automotive type liquids ie oils & coolants

2.2 Spills and Leaks. Areas of Site Where Potential Spills/Leaks Could Occur

Location	Discharge Points
Outdoor fleet vehicle, and temporary heavy equipment parking	Potential leaking of automotive type liquids ie oils & coolants
Loading of light equipment and materials	Potential leaking of automotive type liquids ie oils & coolants

SECTION 3: STORMWATER CONTROL MEASURES.

3. 1 Minimize Exposure.

1. No chemicals or materials in any quantity are stored outside.
2. Only outdoor activities include temporary parking of fleet vehicles and heavy equipment and loading of light equipment and materials.

3. 2 Good Housekeeping.

1. Sanitary waste bins are emptied weekly.
2. Recycling bins are emptied every 2 weeks.
3. Pavement lot is swept as needed.

3.3 Maintenance.

1. Weekly vehicle inspections are performed on each of the fleet vehicles, heavy and light equipment.
2. Drip pans are deployed any time dripping is observed.
3. Routine maintenance, and repairs are done off site at various automotive facilities.

3.4 Spill Prevention and Response.

1. All staff is trained annually on spill prevention and response procedures.
2. Each fleet vehicle is equipped with a spill kit.

3.5 Erosion and Sediment Controls.

1. All soils have been stabilized with pavement sheet, and landscaping materials.
2. No stockpiles of materials stored on this lot.

3.6 Management of Runoff.

1. The stormwater swale is designed to retain 100% of the stormwater runoff from this lot.

3.7 Dust Generation and Vehicle Tracking of Industrial Materials.

1. Pavement sheet eliminates tracking out.
2. No stockpiles of materials stored on this lot.

SECTION 4: SCHEDULES AND PROCEDURES.

4.1 *Good Housekeeping.*

1. Vehicles are inspected weekly.
2. Sanitary waste bins are emptied weekly.
3. Recycle bins are emptied every 2 weeks.
4. Small spills/leaks are cleaned up immediately.

4.2 Maintenance.

1. Weekly vehicle inspections.
2. Fleet vehicles are taken off site for all maintenance work.
3. Light and heavy equipment inspected weekly.
4. Light and heavy equipment are taken off site for all major maintenance work and repairs.
5. Stormwater swale maintained as needed.

4.3 Spill Prevention and Response Procedures.

3. Each fleet vehicle is equipped with a spill kit. Supplies from this kit can be deployed to soak any minor spills, drips or leaks.
2. The facility has drip pans which can also be deployed in the event of leaking, spilling or dripping.

4.4 Employee Training.

Garden City Public Works staff is trained annually on stormwater codes, pollutant identification, and BMPs.

4.5 Facility Inspection

4.5.1 Routine Facility Inspections

Visual inspection conducted a minimum of annually to ensure draining properly. Write report, issue work orders when necessary, and include in annual report.

4.5.2 Quarterly Visual Inspections

A. Person(s) or positions of person(s) responsible for inspection.

1. Kevin Wallis
2. Zach Conde

B. Schedules for conducting inspections.

A minimum of annually

C. List areas where industrial materials or activities are exposed to stormwater.

1. Fleet vehicle parking
2. Loading and unloading of light equipment and materials.

D. List areas identified in the SWPPP (section 1 of the SWPPP Template) and any others that are potential pollutant sources (see Part 5.2.3).

Fleet vehicle, light and heavy equipment leaking of oils and coolants etc.

E. Other site-specific inspection objectives.

Visual inspection to ensure drainage is adequate.

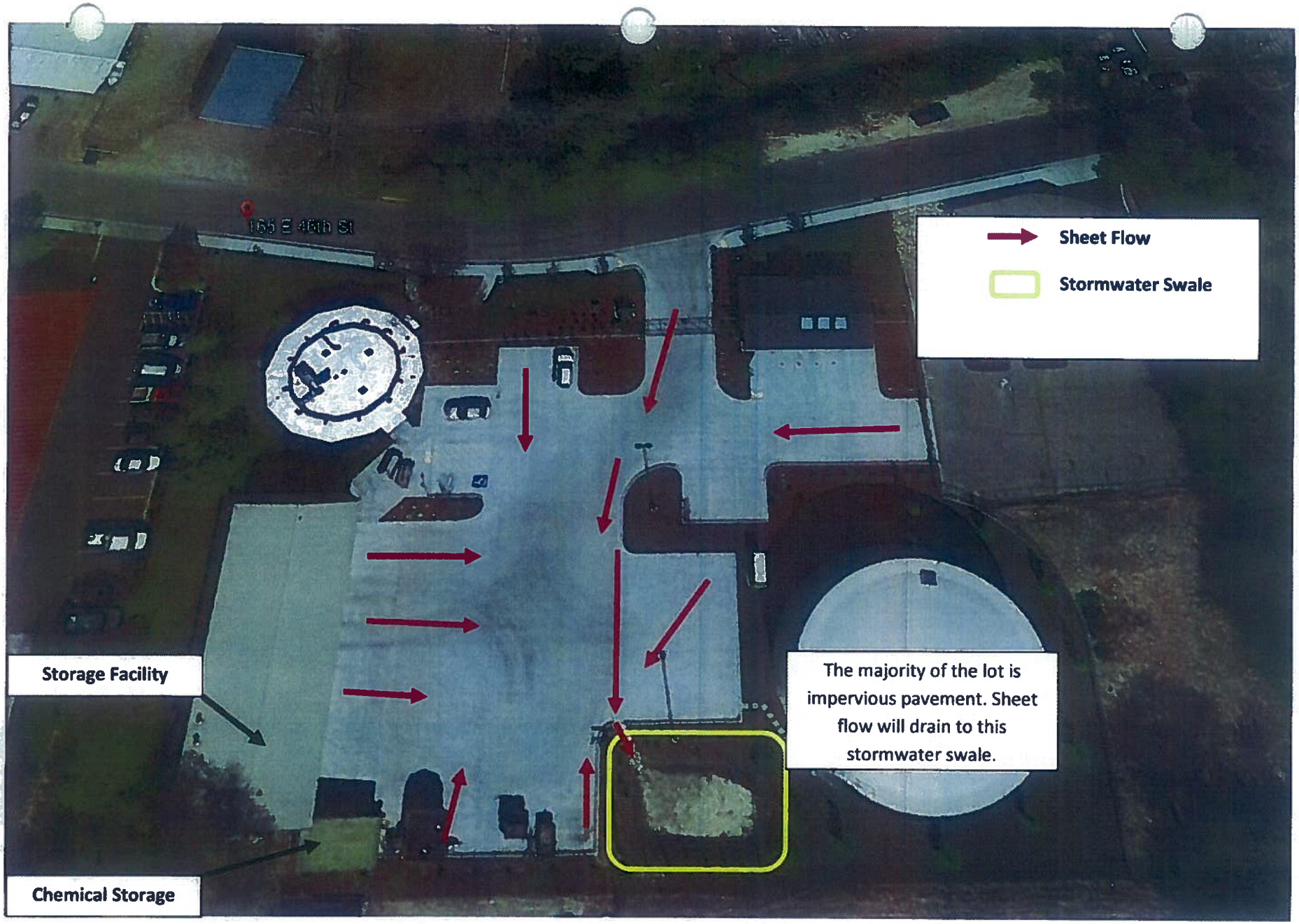
SWPPP ATTACHMENTS

Attachment A – General Location Map

Attachment B – Site Map


165 E 46th St
Garden City 46th Street Storage Facility – 165 E 46th Street
E 45th St

Appendix - A



Appendix B – Garden City 46th Street Storage Facility – 165 E. 46th Street

INTERGOVERNMENTAL AGREEMENT
FOR ROLES AND RESPONSIBILITIES UNDER THE NPDES MUNICIPAL STORMWATER PERMIT (Permit #IDS-02756-1)

This Intergovernmental Agreement entered into this 18th day of June, 20__, by and among the Ada County Highway District (ACHD), the City of Boise (Boise City), City of Garden City (Garden City), Boise State University (BSU), the Idaho Transportation Department, District #3 (ITD), and Ada County Drainage District #3 (DD3), collectively the "Permittees", is made for the purpose of complying with the Federal National Pollution Discharge Elimination System Municipal Stormwater Permit ("NPDES Permit").

RECITALS

WHEREAS, Congress in 1987 amended Section 402 of the Federal Clean Water Act (33 U.S.C.A. section 1342(p)) to require the Federal Environmental Protection Agency (EPA) to promulgate regulations ("Regulations") for applications for permits for stormwater discharges; and

WHEREAS, the Regulations are designed to control pollutants associated with stormwater discharges through the use of the NPDES Permit system which allows the lawful discharge of stormwater into the waters of the United States; and

WHEREAS, the Regulations are designed to require NPDES Permits for discharges from Municipal Separate Storm Sewer Systems (MS4s) from a system-wide or jurisdiction wide basis; and

WHEREAS, the Permittees have received a NPDES Permit, effective February 1, 2013; and

WHEREAS, the NPDES Permit requires that the Permittees must maintain an intergovernmental agreement describing each organization's respective roles and responsibilities related to this permit. Any previously signed agreement may be updated, as necessary, in accordance with this permit. A copy of an updated intergovernmental agreement must be completed by July 1, 2013, and submitted to the Environmental Protection Agency (EPA) with the first annual report.

NOW, THEREFORE, the foregoing sets forth the Agreement by and among the named Permittees.

AGREEMENT

1. PURPOSE OF AGREEMENT

The purpose of this Agreement is to detail the duties, roles and responsibilities to be provided by the Permittees with respect to compliance with Federal NPDES Stormwater rules, regulations and requirements and the commitments set forth in the NPDES Permit issued by EPA. Each Permittee is individually responsible for NPDES Permit compliance related only to portions of the MS4 owned or operated solely by that Permittee, or where this NPDES Permit requires a specific Permittee to take an action. Each Permittee is jointly responsible for NPDES Permit

compliance:

a. related to portions of the MS4 where operational or storm water management program (SWMP) implementation authority has been transferred to all of the Permittees in accordance with an intergovernmental agreement or agreement between the Permittees;

b. related to portions of the MS4 where Permittees jointly own or operate a portion of the MS4;

c. related to the submission of reports or other documents required by Parts II and IV of this NPDES Permit; and

d. where this NPDES Permit requires the Permittees to take an action and a specific Permittee is not named.

2. GENERAL PROVISIONS

a. ACHD, Boise City, Garden City, BSU, ITD and DD3 are Permittees in the Permit as provided in 40 CFR 122.26(v)(2).

b. Each Permittee will be responsible for complying with any and all Permit conditions relating to discharges from those parts of the MS4 that it continues to operate and maintain.

c. The Permittees will utilize available monitoring and enforcement mechanisms, in full cooperation with other Permittees, to control the contribution of pollutants from one MS4 to another.

d. Each Permittee to this Agreement shall assign at least one representative to the Permittee group.

3. STORM WATER MANAGEMENT PROGRAM ROLES AND RESPONSIBILITIES

The roles and responsibilities of each Permittee are as established in the NPDES Permit.

4. APPORTIONMENT OF COSTS

A. Program Administration and Management

The Stormwater Management Program shall be administered by ACHD as the lead agency. Program Administration and Management consist primarily of:

1. Preparing the agenda, minutes, and other documents related to the quarterly meetings and special meetings of the Permittees;

2. Compiling the material from the Permittees for the filing of the annual report to the EPA; and

3. Coordinating the various activities among the Permittees under the NPDES permit.

The Permittees shall reimburse ACHD or the Permittee providing services described in this subsection 4.A. for their share of the Program Administration costs in the following amounts:

ACHD:	65.3% of the total Program Administration Cost
Boise City:	15.3% of the total Program Administration Cost
Garden City:	7.7% of the total Program Administration Cost
BSU:	3.9% of the total Program Administration Cost
ITD:	3.9% of the total Program Administration Cost
DD3:	3.9% of the total Program Administration Cost

Program and Administration shall also include expenses incurred by any Permittee in the drafting, preparation and completion of certain agreements or other documents specifically related to the collective Permittees' activities required by the Permit, by way of example but not by way of limitation this Intergovernmental Agreement. Such expenses shall be shared as stated in this Subsection 4.A. and processed through ACHD as set forth herein. Such expenses shall not include any activity related to any Permittee's own compliance requirements under the Permit.

B. Monitoring Program

Monitoring and planning shall be conducted by ACHD or its contractor as the lead agency. The Monitoring Program consists primarily of:

1. For Permit Year 1, preparing the proposed monitoring program plan as described in the NPDES Permit, including the monitoring protocol, testing, and other activity through a consultant arrangement between ACHD and its selected consultant;

2. After Permit Year 1, engaging in the monitoring program as approved and adopted by the Permittees.

The Permittees shall reimburse ACHD for their share of the Monitoring costs in the following amounts:

ACHD:	65.3% of the total Program Cost
Boise City:	15.3% of the total Program Cost
Garden City:	7.7% of the total Program Cost
BSU:	3.9% of the total Program Cost
ITD:	3.9% of the total Program Cost
DD3:	3.9% of the total Program Cost

C. Public Education Program

Boise City shall be the lead agency for the Public Education Program pursuant to this Agreement. The Public Education Program includes the development of an education outreach program as required by the NPDES Permit. The Public Education Program consists primarily of:

1. Conducting the public outreach program as described in the NPDES permit; and

2. Assessing the penetration of information and any changes in behavior as a result of the Education Program.

The Permittees shall reimburse Boise City for their share of the Public Education Program costs in the following amounts:

Boise City:	65.3% of the total Program Cost
Garden City:	15.3% of the total Program Cost
ACHD:	7.7% of the total Program Cost
BSU:	3.9 % of the total Program Cost
ITD:	3.9 % of the total Program Cost
DD3:	3.9 % of the total Program Cost

D. Timely Payments

All amounts due and owing for the costs of Program Administration, Monitoring and Public Education shall be paid within 45 days of invoice date by each respective Permittee.

E. Annual Review

The allocated percentages of the Permittees' charge shall be reviewed upon an annual basis and if necessary modified.

F. Operating Guidelines and Annual Budget

The Permittees have previously adopted a set of Operating Guidelines ("Guidelines"), a copy of which is attached hereto as Exhibit 1. The Guidelines address the process by which the annual budget is prepared, reviewed, and approved by the Permittees. In addition, the Guidelines also address the manner in which the Permittee meetings are conducted and action is taken by the Permittees. The Guidelines may be amended as set forth therein without requiring an amendment of this Agreement.

5. TERMINATION AND MODIFICATION

Any Permittee under this Agreement shall have the right to withdraw and terminate its responsibilities under this Agreement by serving written notice upon all Permittees in the time and manner described herein. Such written notice shall be served upon all Permittees no later

than the January meeting described in the Operating Guidelines, which meeting provides for the consideration of the budget for the following Permit Year. The written notice shall describe whether the withdrawal is in total for all activities set forth in this Agreement or whether the withdrawal is limited to either the Public Education or Monitoring activities described in this Agreement. If the withdrawal is not a total withdrawal, the Permittee shall remain responsible for its share of the Program and Administration allocated costs. In addition, the withdrawing Permittee shall provide the results of its Public Education or Monitoring program, including the preparation of the Monitoring Plan, for inclusion in the Permittees' annual report. Such withdrawal shall be deemed effective the Permit Year following the service of the written notice upon the other Permittees.

Notwithstanding the right of a Permittee to withdraw from this Agreement as described above, any responsibilities set out in the NPDES Permit with regard to the withdrawing Permittee shall not be affected by Permittee's withdrawal from this Agreement.

Should any Permittee to this Agreement seek to obtain a ruling from the EPA that said Permittee is not an operator of an MS4 or that it is not subject to the NPDES permit, such Permittee shall provide written notice to the other Permittees simultaneously with the filing of materials to the EPA. The Permittee seeking such ruling shall provide the other Permittees with all documents filed with the EPA and shall also provide the other Permittees of the decision or determination of the EPA. Should the Permittee seeking withdrawal appeal the decision or determination of the EPA or an appeal is filed by any other interested entity, the Permittee seeking such ruling shall provide the other Permittees with the documents related to said appeal and the decision or determination of the appellate body. Upon a final decision or determination of the EPA or appellate body finding the Permittee is not required to participate in the NPDES Permit, the Permittee shall be allowed to withdraw from this Agreement effective the next Permit Year after such final decision or determination of the EPA or appellate body. The Permittee seeking such ruling shall be responsible for all costs set forth in this Agreement prior to final withdrawal. Nothing herein shall prevent any other Permittee to participate in the EPA or appellate process concerning the request by the Permittee seeking the determination or decision from the EPA.

In the event of a withdrawal by a Permittee or a final decision or determination by the EPA or appellate body, such Permittee's costs as set forth in this Agreement shall be reallocated among the other Permittees as may be mutually agreed by those other Permittees.

This Agreement may be modified or amended in writing and effective when executed by all Permittees and approved by EPA.

6. ATTORNEY FEES

Should any Permittee find it necessary to employ an attorney for representation in any action seeking enforcement of any of the provisions of this Agreement, or to protect its interest in any matter arising under this Agreement, or to recover damages for the breach of this Agreement, or to resolve any disagreement in interpretation of this Agreement, the unsuccessful Permittee(s) in any final judgment entered therein agrees to reimburse the prevailing party or parties for all reasonable costs, charges and expenses, including attorneys' fees expended or incurred by the

prevailing party or parties in connection therewith and in connection with any appeal, and the same may be included in such judgment.

7. NOTICES AND CONTACTS

Any and all notices required to be given by any of the Permittees hereto shall be in writing and deemed delivered when either: (i) delivered personally, or (ii) sent by fax to the other parties at the fax telephone number as set forth; or (iii) deposited in the United States Mail, certified, return receipt requested, postage prepaid, addressed to the other Permittees at the address as set forth, or such other fax telephone number or mailing address as may be provided by written notice of such change given to the others in the same manner as above provided.

For the purpose of providing contact information under this Agreement and to provide notice as required, the following are the contacts and addresses of each representative designated by each Permittee:

Ada County Highway District:
Stormwater Quality Coordinator
Ada County Highway District
318 E. 37th Street
Garden City, ID 83714
(Phone): 208-387-6254
(Fax): 208-387-6391
(Email): emaguire@achdidaho.org

City of Garden City:
Environmental Manager
City of Garden City
201 E. 50th Street
Garden City, ID 83714
(Phone): 208-472-2900
(Fax): 208-472-2998
(Email): kwallis@gardencity.idaho.org

Idaho Transportation Department, District #3:
Environmental Planner, Senior
8150 Chinden Boulevard
Boise, ID 83714
(Phone): 208-334-8300
(Fax): 208-334-8917
(Email): greg.vitley@itd.idaho.gov

City of Boise:
Water Quality Manager
City of Boise
P.O. Box 500
Boise, ID 83701-0500
(Phone): 208-384-3900
(Fax): 208-433-5650
(Email): rfinch@cityofboise.org

Boise State University:
Environmental Health Manager
Boise State University
1910 University Drive
Boise, ID 83725
(Phone): 208-426-3999
(Fax): 208-426-3343
(Email): barbarabeagles@boisestate.edu

Ada County Drainage District #3:
Counsel for Drainage District #3
Elam & Burke
P.O. Box 1539
Boise, ID 83701
(Phone): 208-343-5454
(Fax): 208-384-5844
(Email): rpa@elamburke.com

9. ENTIRE AGREEMENT

Except as provided otherwise herein, this instrument and any attachments hereto constitute the entire Agreement among the Permittees concerning the subject matter hereof.

IN WITNESS WHEREOF, the Permittees hereto have caused this Agreement to be duly executed as of the day and year first above written.

ADA COUNTY HIGHWAY DISTRICT

By: _____
Sara Baker
President, ACHD Commission

Attest: ACHD Director, Bruce S. Wong

CITY OF BOISE CITY

By: _____
David H. Bieter, Mayor

Jade Riley

CITY OF GARDEN CITY

By: _____
John G. Evans Mayor

James R. Krueger
Attest: City Clerk

BOISE STATE UNIVERSITY

By: _____
Vice President, Finance and Administration

IDAHO TRANSPORTATION DEPARTMENT,
DISTRICT #3

By: _____
Dave J Tomas, District Engineer

ADA COUNTY DRAINAGE DISTRICT No. 3

By: _____
Steve Nielsen, Chair

State of Idaho)
)ss
County of Ada)

On this 28th day of June, 2013, before me, Stephanie L. Blake, a Notary Public in and for the state of Idaho, personally appeared Sara M. Baker and Bruce S. Wong, known or identified to me to be the President and Director of Ada county Highway District who executed this instrument, and acknowledged to me that Ada County Highway District executed the same.

_____
Notary Public for Idaho
Commission expires: 3-4-2017

STEPHANIE L. BLAKE NOTARY PUBLIC STATE OF IDAHO

State of Idaho)
)ss
County of Ada)

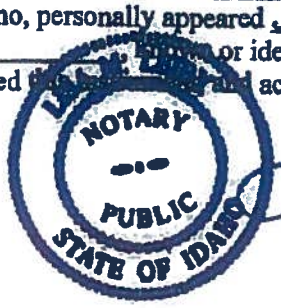
On this 18th day of June, 2013, before me, Debbie Westervelt, a Notary Public in and for the state of Idaho, personally appeared David H Bieter and Jade Riley, known or identified to me to be the Mayor and City Clerk of City of Boise who executed this instrument, and acknowledged to me that City of Boise executed the same.

_____
Notary Public for Idaho
Commission expires: 8-24-2015

DEBBIE WESTERVELT
NOTARY PUBLIC
STATE OF IDAHO

State of Idaho)
)ss
County of Ada)

On this 6th day of May, 2013, before me, Lisa M. Leiby, a Notary Public in and for the state of Idaho, personally appeared John G. Evans and James R. Krueger known or identified to me to be the Mayor and City Clerk of Garden City who executed the [illegible] and acknowledged to me that Garden City executed the same.



Notary Public for Idaho
Commission expires: 8/31/13

State of Idaho)
)ss
County of Ada)

On this 24th day of May, 2013, before me, Yolanda L Michaels, a Notary Public in and for the state of Idaho, personally appeared Stacy Pearson, known or identified to me to be the Vice President, Finance and Administration, of Boise State University, who executed this instrument, and acknowledged to me that Boise State University executed the same.

Notary Public for Idaho
Commission expires: June 9, 2017

State of Idaho)
)ss
County of Ada)

On this 28 day of June, 2013, before me, Linda B Hunter, a Notary Public in and for the state of Idaho, personally appeared Dave Jones, known or identified to me to be the _____, of Idaho Department of Transportation, who executed this instrument, and acknowledged to me that Idaho Department of Transportation executed the same.

Linda B Hunter
Notary Public for Idaho
Commission expires: 11-26-2014

INTERAGENCY AGREEMENT
FOR THE INSPECTION, MONITORING AND ENFORCEMENT OF
INDUSTRIAL AND COMMERCIAL HIGH RISK RUNOFF

THIS INTERAGENCY AGREEMENT FOR THE INSPECTION, MONITORING AND ENFORCEMENT OF INDUSTRIAL AND COMMERCIAL HIGH RISK RUNOFF ("Agreement") is made this 24th day of January, 2018, by and between the CITY OF GARDEN CITY, hereinafter called CITY, and ADA COUNTY HIGHWAY DISTRICT, hereinafter called ACHD and together called PARTIES.

RECITALS:

WHEREAS, ACHD is a single county-wide highway district organized and existing under the laws of the State of Idaho, with the jurisdiction over public rights-of-way, including storm water drainage, in Ada County; and

WHEREAS, CITY is a municipal corporation with police power to regulate and control illicit discharges within the jurisdictional limit of the CITY, including stormwater discharges originating outside of ACHD road right-of-way and, therefore, outside of ACHD jurisdiction; and

WHEREAS, Idaho Code Section § 67-2326 authorizes joint action between "public agencies" (which, by definition includes ACHD and City) in the exercise of their respective powers to provide services and facilities and to perform functions in a manner that will best accord with geographic, economic, population, and other factors influencing the needs and development of the respective entities; and

WHEREAS, Idaho Code § 67-2332 provides that public agencies may contract with one another to perform any governmental service, activity, or undertaking that each public agency entering into the contract is authorized by law to perform; and

WHEREAS, it is the declared policy of the PARTIES to maintain the quality and value of water resources of the State of Idaho, in a manner pursuant to and consistent with the Clean Water Act; and

WHEREAS, ACHD and CITY are permittees (PERMITTEE) of a Municipal Storm Water National Pollutant Discharge Elimination System (NPDES) Permit (Permit No. IDS-027561 or Permit), issued by the United States Environmental Protection Agency (EPA) effective February 1, 2013; and

WHEREAS, pursuant of 40 CFR § 122.26(d)(2)(iv) and NPDES Permit No. IDS-02756-1, PERMITTEES must implement a Storm Water Management Program (SWMP) designed to limit, to the Maximum Extent Practicable (MEP), the discharge of pollutants to and from that portion of the municipal separate storm sewer systems (MS4) owned or operated or utilized by each PERMITTEE; and

WHEREAS, pursuant to 40 CFR § 122.26(d)(2)(iv)(C) and NPDES Permit No. IDS-02756-1, Section II.B.3, PERMITTEES must implement a program to reduce to the MEP the discharge of pollutants from industrial and commercial sites and activities within their jurisdiction, unless such discharges are excluded from NPDES Permit requirements pursuant to 40 CFR §122.3. Said program must include educational and/or enforcement efforts to reduce the discharge of pollutants from those industrial and commercial locations which are considered to be significant contributors of phosphorus, bacteria, temperature, and/or sediment to receiving waters and the PERMITTEES must work cooperatively to prioritize and inspect industrial and commercial facilities/activities which discharge to receiving waters or to the MS4; and

WHEREAS, CITY has through its police power adopted and enacted a commercial and industrial site pretreatment inspection program, known as Garden City [Ordinance/Code] 6-6 ("Program"), providing an efficient method of inspection and monitoring of industrial and commercial discharges in the area within the physical boundaries of CITY subject to the jurisdiction of ACHD; and

WHEREAS, CITY has developed a Program-based outfall inventory that is updated annually as required under the NPDES Permit No. IDS-027561;

WHEREAS, it is determined to be in the best interest of ACHD and CITY and their respective constituencies to coordinate joint use of, and cooperatively implement and enforce the Program satisfying the aforementioned Municipal Storm Water NPDES Permit regulatory requirements, and to set forth the purposes, powers, rights, objectives and responsibilities of each party.

NOW, THEREFORE, in consideration of the mutual terms, covenants, and conditions contained herein and the recitals set forth above, which are a material part of this agreement, the PARTIES agree as follows:

1. CITY and ACHD shall coordinate annually and develop a scope of work identifying and prioritizing the high risk industrial and commercial facilities, activities, and corresponding discharges that are the subject of Permit Section II.B.3. The scope of work shall prescribe stormwater monitoring provisions under the authority of the Program, and define and govern the PARTIES' respective Program-related obligations from October 1 through September 30 of each year.

2. CITY, on behalf and as agent for ACHD, agrees to perform technical and administrative duties necessary to implement and enforce the Program, including inspection and monitoring of industrial and commercial facilities to verify that the facilities are discharging storm water to the MS4 in compliance with the Permit and any future iterations or versions thereof;

3. ACHD hereby grants to CITY the power and authority within the ACHD's jurisdiction for the purposes of implementation and enforcement of the Program and this Agreement within the corporate limits so implement and enforce the Program, particularly upon ACHD request. Authorized representatives of CITY's Public Works

Department, upon presentation of credentials of identification, may enter and inspect, at any reasonable time, that part of the MS4 which may be connected to an industrial or commercial facility for the purpose of determining compliance with relevant storm water regulatory requirements

4. PARTIES agree to provide to one another reasonable access to and copies of documents and information relating to the implementation, joint use, and enforcement of the Program.

5. CITY agrees to exercise its municipal police powers to criminally enforce the Program at ACHD's request subject, however, to the discretion of the CITY's attorney's office. Where feasible, CITY criminal enforcement of the Program within its corporate limits shall also seek restitution on behalf of ACHD.

6. Should CITY fail to criminally enforce the Program, ACHD reserves the right to pursue any and all civil remedies available to it for Program violations, and CITY agrees to cooperate with ACHD's civil enforcement efforts.

7. CITY further agrees to provide, on or before November 15 each year, an updated inventory and annual summary report of the compliance assistance and inspection activities conducted under the Program, as well as any follow-up actions for each facility inspected or/monitored from the preceding October 1 through September 30 period.

8. PARTIES acknowledge and agree that ACHD shall not perform any private property inspections or discharge monitoring under the Program. ACHD inspections or monitoring, if any, are restricted to the public road right-of-way.

9. ACHD agrees to reimburse the CITY on a "time and material" basis in an amount not to exceed Five Thousand Dollars ($5,000) total for each annual period without further specific written authorization from ACHD, for the duration of this Agreement.

10. The duration of this Agreement shall be five years from the date of execution or until the next Permit is issued. Either party may terminate this Agreement at any time by providing sixty (60) days written notice to the other as well as to EPA. Notice for the PARTIES are to be sent first class, postage prepaid to the following:

Ada County Highway District:
Stormwater Quality Supervisor
Ada County Highway District
3775 Adams Street
Garden City, ID 83714
Fax: 387-8391

City of Garden City:
Public Works Director
City of Garden City
6015 Glenwood Street
Garden City, ID 83714
Fax: 472-2996

11. PARTIES agree that if the authority of the CITY to act as the agent for ACHD under this Agreement is questioned by any person, court of law, or otherwise, ACHD shall take whatever action necessary to ensure administration and implementation of the Program on its own behalf and/or amend this Agreement to further provide or substantiate the basis for CITY's agency-related authority.

12. The terms of this Agreement may be amended only by written agreement signed by all PARTIES.

IN WITNESS WHEREOF, the PARTIES shall cause this Agreement to be executed by their duly-authorized officers the day and year first above written.

ADA COUNTY HIGHWAY DISTRICT

By: _____
Sara Baker ~~Paul Woods~~, President

Attest: ACHD Director

CITY OF BOISE

By: _____
John Evans, Mayor

Attest: City Clerk

CITY OF GARDEN CITY, IDAHO
SEAL

COPY

OPERATING GUIDELINES

THESE OPERATING GUIDELINES ("Guidelines") are adopted this 19th day of October, 2006, by the CITY OF BOISE CITY, hereinafter called CITY; ADA COUNTY HIGHWAY DISTRICT, hereinafter called ACHD; ADA COUNTY DRAINAGE DISTRICT NO. 3, hereinafter called DD3; IDAHO TRANSPORTATION DEPARTMENT, DISTRICT 3, hereinafter called ITD; BOISE STATE UNIVERSITY, hereinafter called BSU; and the CITY OF GARDEN CITY, hereinafter called GARDEN CITY; collectively the "Co-Permittees.

WHEREAS, Congress in 1987 amended Section 402 of the Federal Clean Water Act (33 U.S.C.A. section 1342(p)) to require the Federal Environmental Protection Agency ("EPA") to promulgate regulations ("Regulations") for applications for permits for stormwater discharges;

WHEREAS, the Regulations are designed to control pollutants associated with stormwater discharges through the use of the NPDES Municipal Stormwater Permit system which allows the lawful discharge of stormwater into the waters of the United States;

WHEREAS, the Regulations are designed to require NPDES Municipal Stormwater Permits for discharges from Municipal Separate Storm Sewer Systems (MS4s) from a system-wide or jurisdiction wide basis;

WHEREAS, the Co-Permittees received the first NPDES Municipal Stormwater Permit (Permit #IDS-0275601 [the "NPDES Permit"]), effective November 29, 2000, with subsequent renewals of the NPDES Permit through November, 2005;

WHEREAS, it was necessary to provide a basis for defining the Co-Permittees' primary intentions, relationships, responsibilities and obligations for ensuring compliance with the NPDES Municipal Stormwater requirements;

WHEREAS, the NPDES Permit requires the Agreement to define the respective obligations of the Co-Permittees;

WHEREAS, it is the declared policy of the Co-Permittees to enhance and preserve the quality and value of water resources of the State of Idaho in a manner pursuant to and consistent with the Clean Water Act;

WHEREAS, pursuant to 40 CFR § 122.26(d)(2)(iv) and the NPDES Permit, each Co-Permittee shall implement a Storm Water Management Program ("SWMP") designed to limit, to the Maximum Extent Practicable ("MEP"), the discharge of pollutants to and from that portion of the municipal separate storm sewer systems (MS4) owned or operated or utilized by that Co-Permittee;

WHEREAS, pursuant to 40 CFR § 122.26(d)(2)(i)(A-F) and the NPDES Permit, each Co-Permittee shall, unless such discharges are excluded from NPDES Permit requirements pursuant to 40 CFR §122.3: (1) control through ordinance, permit, contract, order or 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 ordinance, order, or similar means illicit discharges to the MS4; (3) prohibit through ordinance, order, or similar means the discharge the MS4 of spills, dumping, or disposal of materials other than storm water; (4) control through interagency agreements among Co-Permittees the contribution of pollutants from one portion of the MS4 to another portion of the MS4; (5) require compliance with conditions in ordinances, permits, contracts, or 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.

WHEREAS, the Co-Permittees, as public agencies, all have varying procedures concerning the setting of those entities' budgets and the time frame for the approval of those budgets;

WHEREAS, the Co-Permittees entered into that certain *Intergovernmental Agreement For Roles and Responsibilities Under the NPDES Permit*, dated October 21, 2001, which generally outlined the process by which the Co-Permittees shall fund certain activities in compliance with the NPDES Permit;

WHEREAS, the Co Permittees desire these Guidelines (including certain budget procedures), to guide the Co-Permittees through the activities in which all share in the cost and/or administration of the program;

NOW, THEREFORE, the Co-Permittees concur with the following process for:

A. The annual budget of costs to be shared by the Co-Permittees pursuant to the Permit and the Intergovernmental Agreement; and

B. Operating Guidelines on approval of activities and expenses.

Section 1. Schedule and Process:

Each January of each Permit Year, the lead Co-Permittee entity for the activities to be shared by all of the Co-Permittees, shall present at a scheduled Co-Permittee meeting, a proposed budget outlining the costs for the upcoming year as well as providing a comparison for similar activities within the previous year.

For purposes of these Guidelines, "Permit Year" shall be deemed the equivalent of "Water Year" even though those terms may not be similar as defined in the NPDES Permit.

The Co-Permittees shall consider such budget, provide comment, and the budget shall be approved at the Co-Permittee meeting held in March of each Permit Year, upon motion and approval by a majority of the Co-Permittees present.

Section 2. Budget Revisions:

Throughout the Permit Year revisions to the approved budget to reallocate funds among categories and classifications or to reduce the approved budget may be considered by the Co-Permittees. Such reduction or reallocation shall be reviewed and approved by the Co-Permittees representatives at a duly noticed Co-Permittee meeting. No overall increase in the budget or additional funds shall be authorized unless approved by the Co-Permitttees, upon motion and approval by a majority of the Co-Permittees present, and each Co-Permittee has budget authority for such revisions.

Section 3. Co-Permittee Budget Approval:

Nothing herein shall affect the process or authority of each Co-Permittee to obtain from its governing body the necessary approval for the budget as required by each Co-Permittee's governing laws, regulations or policy and each Co-Permittee's own activities for which it is responsible under the Permit.

Section 4. Operating Guidelines:

Generally, the Co-Permittee meetings shall be managed in such a manner to achieve the objectives of the NPDES Permit and the NPDES program. For those items previously approved by way of the budget, the lead Co-Permittee shall provide sufficient notice of such expenditure prior to incurring the obligation. Provided, however, that the Co-Permittees may dispense of this guideline by action taken at a regularly scheduled Co-Permittee meeting. Approval of expenses and approval of certain programs shall occur at a regularly scheduled Co-Permittee meeting, upon motion and approval by a majority of the Co-Permittees present.

Co-Permittee meetings will be conducted on an informal basis facilitated by the ACHD representative. The ACHD representative shall also be responsible for taking and distributing minutes, providing an agenda, and, to the greatest extent possible, forwarding information to the Co-Permittees for consideration at the meeting. Any action to be taken shall be accomplished by motion and vote. To the greatest extent possible, Roberts Rules of Order shall govern the voting process.

Section 5. Effect:

These Operating Guidelines have been adopted by the Co-Permittees at the Co-Permittee meeting dated October 17, 2006. Nothing herein shall be deemed to infringe upon any Co-Permittees legal authority concerning the expenditure of public funds.

Section 6. Amendment:

These Operating Guidelines may be amended in writing, upon at least ten (10) days written notice of such amendment to each Co-Permittee. Any amendment shall be approved by majority vote of the Co-Permittees present at the meeting called for such purpose.

ADA COUNTY HIGHWAY DISTRICT

By: _____
Its Co-Permittee NPDES Representative

CITY OF BOISE CITY

By: _____
Its Co-Permittee NPDES Representative

CITY OF GARDEN CITY

By: _____
Its Co-Permittee NPDES Representative

BOISE STATE UNIVERSITY

By: _____
Its Co-Permittee NPDES Representative

IDAHO TRANSPORTATION DEPARTMENT, DISTRICT #3

By: _____
Its Co-Permittee NPDES Representative

ADA COUNTY DRAINAGE DISTRICT No. 3

By: _____
Its Co-Permittee NPDES Representative

Appendix B

Garden City Ordinances Related to Stormwater Management

Table of Contents:

1. Title 4-14 Stormwater Management and Discharge Control Ordinanace

http://www.codepublishing.com/ID/GardenCity/

2. Title 4-15 Construction Site Erosion Control Ordinance

http://www.codepublishing.com/ID/GardenCity/

3. 4-15 Construction Site Erosion Control Ordinance Update (ordinance 979-15)

http://www.gardencityidaho.org/vertical/sites/%7BA16794C5-94AE-4C54-B8E9-ADC537012C3F%7D/uploads/Ord979-15_-_2nd_Reading_07-13-2015.pdf

4. Title 8-4G: Sustainable Development Practices - water quality excerpts

http://www.codepublishing.com/ID/GardenCity/

Appendix C

Environmental Division Policy and Procedures Pertaining to the SWMP

Table of Contents:

GARDEN CITY PUBLIC WORKS DEPARTMENT

Policy and Procedure

Chapter:	8 Environmental	Number:	8.11
Subject:	Construction Site Erosion and Runoff Policy and Procedure		
Used By:	Environmental Division – Development Services		
Issued:	05/16/2013	Revised:	09/26/2016

Purpose: To establish a policy and procedure to help assure Garden City compliance with the NPDES Permit along with State and Federal laws by preventing sediment and pollutant runoff from construction sites.

Policy: Pursuant to Garden City Code § 4-15 Erosion and Sediment Control, qualified construction activity will be assessed for compliance with applicable local, state, and Federal laws pertaining to construction site runoff using the procedure below. This policy establishes a fair and uniform means of initiating, documenting, and conducting inspections and enforcement actions in response to violations of erosion & sediment control codes and ordinances. The Public Works Department recognizes that violations arise under a variety of circumstances and this policy establishes procedures designed to address those circumstances most commonly faced by inspection personnel. This policy provides inspection personnel with an enforcement protocol to follow in order to bring code violations into compliance with applicable codes and/or standards.

Definitions of Acronyms:

- Annual Erosion Permit (AEP)
- Best Management Practices (BMPs)
- General Erosion Permit (GEP)
- Erosion and Sediment Control (ESC)
- Erosion & Sediment Control Plan (ESCP)
- National Pollutant Discharge Elimination System (NPDES)
- Responsible Person (RP)
- Stormwater Pollution Prevention Plan (SWPPP)

Procedure:

I. **Plan review phase**

1. Building Permit Application: Applicants submit building plans for their construction project as part of the building permit application process at Development Services.

2. Plan Review: Project plans are reviewed during the application process and are assessed by the Environmental Division plan reviewer as to whether the project requires an AEP/GEP and/or an ESCP and meets Garden City Code requirements.

3. Contractor/Developer Notification: Once a plan has been reviewed, the applicant is sent an email with the ESC plan review report. The report document lists the result of the ESC plan review, any pertinent notifications regarding the site, and the **ESC General Conditions** of the AEP/GEP permit if applicable.

   a) If the plan is approved the plan reviewer signs the plan and forwards the ESC plan review report with any conditions to the applicant and Development Services. The plan reviewer then staples a printed copy of the plan review report to the signed copy of the plan.

   b) If the plan is not approved the plan reviewer does not sign the plan and forwards the ESC plan review report via email noting any corrections, deficiencies and required submittals to the applicant and Development Services.

II. Site Preparation Inspection Procedure:

1. The City will issue BLD and AEP/GEP permits once the application process has been completed. In certain cases a contractor will already have an active AEP prior to the site specific BLD permit being issued.
2. The contractor/RP may now install the BMPs prescribed in the ESCP or ESC general requirements. BMPs must be implemented at the site prior to any excavation/earthwork. Permits must be posted at the site.
3. When all BMPs have been installed, the contractor/RP will notify the City at least 24 hours prior to planned start of excavation and will request a site preparation inspection with Development Services.
4. The Environmental Division receives notification from Development Services that contractor/builder has requested a site preparation inspection.
5. The erosion and sediment control inspector will respond to Development Services and will contact RP to confirm the initial inspection and make an appointment if necessary.
6. The inspector will perform a site preparation inspection and assess compliance. Excavation may not begin until the initial site preparation inspection has been conducted and approved.
7. The inspector shall notify RP on status of the site preparation inspection with a telephone call or email upon completion of the inspection.

8. The inspection will be tracked in the Springbrook database with an electronic inspection report.
9. Follow-up inspection frequency will be determined at this time (see below).

III. Follow-up inspection frequency

Once an initial site preparation inspection has been conducted and is approved, the follow-up inspection frequency for a construction site is based on 3 categories: type of construction, size or project site, and location in regards to a water body.

For each category, points are assigned depending on site characteristics using the following matrices. Add the total amount of points for the site for assessing the frequency of inspections.

Type of Construction	Points
Commercial	1
Residential	2

+

Size of Construction Site	Points
less than 1 acre	1
between 1-5 acres	2
greater than 5 acres	3

+

Location	Points
Near a water body	3
Not near a water body	0

= Total

Total	Inspection Frequency
1-3	monthly
4-6	biweekly
7-8	weekly

IV. Inspection Procedure: Routine ESC inspections will consist of the following steps.

1. Check that permits are posted.
2. Assess compliance with ESC and BMP requirements.
3. Check for non-stormwater discharges.
4. Take pictures to document violations as necessary.
5. Make correction notice to RP if necessary.
6. Track inspection in Springbrook database with electronic inspection report.
7. Take necessary follow-up actions (re-inspection/enforcement).

V. Enforcement response and escalation matrix

<u>IF PERMITS HAVE BEEN ISSUED AND A VIOLATION HAS BEEN IDENTIFIED THE INSPECTOR SHALL:</u>

1. Issue verbal warning in person or via phone.
2. At minimum, warning shall specify violation(s) and required corrective action(s).
3. Re-inspect at next routine inspection, or sooner depending on expectation set.

4. If compliance is not achieved issue 2nd correction notice that includes a written warning. This shall include the nature of violation(s), the required corrective action(s) and the deadline for taking such action(s).
5. Re-inspect at deadline set in written warning.
6. If compliance has not been achieved after issue of verbal warning followed by a issue of written warning, obtain approval from Environmental Manager and Public Works Director to issue Stop Work Order.
7. Issue Stop Work Order. If approved all construction activities must stop with the exception of those activities directed at cleaning up, abating discharge or installing appropriate control measures.
8. Once corrections have been made RP will contact Development Services and request re-inspection.
9. Development Services will issue work order to Environmental Division to perform re-inspection. The Environmental Division will perform the inspection within 24 hours of receiving work order.
10. Once the inspector has confirmed the required corrections have been made and any fines issued have been paid, the Stop Work Order shall be lifted and work may resume.

IF WORK WITHOUT ESC & BLD PERMITS IS OCCURING, THE INSPECTOR SHALL:

1. Obtain approval from Environmental Manager and Public Works Director to issue Stop Work Order.
2. Issue Stop Work Order. Once issued all construction activities must stop with the exception of those activities directed at cleaning up, abating discharge or installing appropriate control measures.
3. Once the inspector has confirmed the required corrections have been made and any fines issued have been paid, the Stop Work Order shall be lifted and work may resume.

VI. Final Inspection Procedure

As a condition to receive the Certificate of Occupancy for a completed BLD project, the site must pass a final ESC inspection. The Final Inspection procedure is as follows:

1. Applicant will request final inspection at least 24 hours prior to the desired time of inspection.
2. Environmental Division receives email notification from Development Services with Final Inspection task scheduled in database. The city will ensure the inspections occur with 24 hours of request.
3. Inspection checklist:
    - Final grading is complete.
    - Site stabilization per ESC general requirements or as indicated in ESCP must be completed. All earth disturbed during project must be stabilized.

- Non-biodegradable BMPs and drop inlet protection are removed.
- All trash and construction debris on site an in adjacent areas are removed.

4. The ESC inspector will enter the result of the inspection by entering the completed task report into the Springbrook database. Any corrective actions needed to pass the inspection will be noted in the report.
5. Once the Final inspection is approved, the inspector will sign the Certificate of Occupancy card.

Risk: Loss or damage to human health & the environment. Increased liability and/or potential litigation; non-compliance with Local, State, & Federal Regulations.

Attachments:

8.9.1 – ESC General Requirements

9-27-16

Public Works Director Signature **Date**

8.11.0 Erosion and Sediment Control GENERAL REQUIREMENTS:

1. File a "Notice of Intent" with EPA for all sites that are 1 acre or greater OR located in a common area or development which is 1 acre or more.

2. An individual who has attended either an EPA approved erosion and sediment control training program OR the "Boise City Responsible Training" program or; must be in charge of the erosion and sediment control (ESC). This person shall be in charge of ESC at all times during each phase of the construction and until permit is closed for Garden City.

3. In the event the applicant fails to provide adequate control under the provisions of this permit, the City reserves the right to require additional control measures as necessary OR require the preparation and implementation of a site-specific plan.

4. The applicant shall notify the City of the intent to start construction 24 hours prior to the start of the site excavation, phone City Hall @ 208-472-2900.

5. The applicant shall have the "Garden City Erosion Annual Permit" posted and all information completed at all times.

6. The applicant shall have the "Garden City Building Permit & Inspection Record Card" available at all times on the construction site.

7. Any location where sediment-laden run-off may exit the property, perimeter control will be installed to prevent sediment from being transported off-site. Any sediment transported off-site to roads or road rights-of-way including ditches shall be removed. Any damage to ditches shall be repaired and stabilized to original condition.

8. Grading shall not impair surface drainage, create an erosion hazard or create a source of sediment to any adjacent watercourse or property owner.

9. The applicant is responsible for preventing and immediate clean up of the tracking of mud or dirt upon the public rights of way.

10. Construction ramps shall not be placed in a manner as to interfere with or block the passage of storm water runoff.

11. No materials or supplies shall be placed on the public rights-of-way (streets or sidewalks) unless permitted by ACHD.

12. Control measures (Approved-Best Management Practices) shall be in place during construction to prevent sediment from entering Storm Water Inlet Structures downstream from the property.

13. Control measures shall be implemented for the disposal of construction and building waste, paint, dry wall waste and compounds and other chemicals used during construction.

14. Equipment and vehicle washing operations during construction must be in an area specifically designated by the owner/contractor. Pressure washing of driveways, sidewalks, streets or gutters is prohibited unless approved measures are used to prevent sediment or polluted water from entering the storm water system.

15. Portable toilets, material and waste containers shall not be placed on a street or sidewalk or located next to a storm water inlet structure. Toilets, material and waste containers shall be located in a designated area; in a manner that will not pose a potential risk of possible discharge to the storm drain system.

16. Temporary or permanent stabilization of the construction site shall be completed to the surface of all disturbed areas not actively under construction. Permanent site stabilization must occur within 30 days of removal of temporary measures unless other arrangements have been made with Garden City.

17. Specific stabilization recommendations may be found in the "Erosion and Sediment Control Field Manual" or in other approved Best Management Practice (BMP) manuals.

18. Swales or other areas that transport concentrated flow will be stabilized with an approved BMP.

19. Changes or modifications during construction to the project outside of what has been approved; is required to have review and approval prior to implementation.

EXEMPTIONS: The following construction or land disturbing activities are considered exempt from the Erosion & Sediment requirements of the permit:

- Minor land disturbance activities performed by the home owner, current occupant or an employee of either, including, but not limited to, individual home gardens, commercial and residential landscaping, and landscaping maintenance and repair work.
- Installation of fence, sign, telephone, electric poles, and other types of posts and poles and Repair, replacement, and utility work, which occurs entirely on a residential lot, in which is less than two cubic yards and no sediment leaves the property.
- Drain tiling, tilling, or planting incidental to agricultural crops, and harvesting of agricultural, horticultural or agricultural (forestry) crops.
- Emergency repairs or emergency work necessary to protect life, limb or property.

- Utility repair work that involves less than two cubic yards of excavation in any one location.
- Construction activity that occurs entirely on federal or state owned lands.
- Construction and maintenance activity that occurs on transportation rights-of-way or land owned by a separate governmental entity, when an erosion control plan for the activity has been approved by the controlling governmental entity.
- Construction, maintenance, and any other land disturbing activity on canals, laterals, sub-laterals, ditches, drains, and other water conveyance facilities, and all appurtenant roadways and structures, which occurs within the fee title lands, right-of-ways, or easements for such facilities and appurtenances. This exemption is not a relief from provisions of this Ordinance which control activities that impact public or private property.

General Notes- Drainage System Construction:

Garden City Drainage Inspection Request Hot Line: 208-472-2920

- Drainage observations shall be conducted at any given time or upon request, during construction, verifying compliance with the city requirements and the construction activities are followed as per the approved plans. Call 472-2920 to request drainage observations.
- No fill material will be placed over any excavated drainage area prior to inspection.
- No covering of fabric and / or drainage system shall be conducted prior to inspection/observation by city.
- Observation of size and position for the drainage system shall be conducted by city. Appropriate size and position for the system shall be consistent with the approved drainage system plans.
- Final observation of the storm drain system shall be conducted following the paving and final landscape.
- All drainage conveyance access points shall be stenciled or marked with identifying statement for the public "Do Not Dump-system drains to groundwater" or "river". Whichever is relevant to the system disposal design.
- Traffic manhole rated lids are to be used.
- All parking lot grades shall be 1%-for asphalt & 0.3%- for concrete.
- All inspections shall require a 24 hour notice prior to the requested inspection time.

ENVIRONMENTAL FINE & COST RECOVERY SCHEDULE:

The following fine schedules shall be used during environmental enforcement. This schedule in no way relieves the violating party from additional, fines, cost recovery or escalated enforcement action(s) as necessary.

Notices of Violation	
Offence	**Fine**
1st NOTICE OF VIOLATION	None
2nd NOTICE OF VIOLATION	$300.00 per day per violation
3rd NOTICE OF VIOLATION	$600.00 per day per violation
4th NOTICE OF VIOLATION	Termination of City Services and/or Criminal Prosecution

A fourth violation during any consecutive six month period for the same code section will constitute possible Termination of City Services and/or Criminal Prosecution.

Failure to Comply with Notices of Violation, Compliance Orders & Administrative Orders	
Offence	**Fine**
1 – 15 Days Late Compliance	$300.00 per day per violation
15 - 29 Days Late Compliance	$600.00 per day per violation
30 -60 Days Late Compliance	$1000.00 per day per violation
60 days or more Late Compliance	Termination of City Services

Failure to Comply with a Cease & Desist Order	
Offence	**Fine**
1 - 30 Days Late Compliance	$1000.00 per day per violation
30 days or more Late Compliance	Termination of City Services and/or Criminal Prosecution

Reporting & Miscellaneous Infractions	
Offence	**Fine**
1 – 10 Days Late Report	$100.00 per day per violation
11 - 20 Days Late Report	$250.00 per day per violation
20 - 29 Days Late Report	$500.00 per day per violation
30 -60 Days Late Report	$1000.00 per day per violation
60 days or more Late Report	Termination of City Services
Falsification of Reports	$1,000.00 - Termination of City Services and/or Criminal Prosecution
Entry Denial and/or unprecedented delay of entry	$1,000.00 and or Termination of City Services

Cost Recovery for other Enforcement Actions

Increased Sampling Frequency	$250.00
Compliance Order	$250.00
Cease & Desist Order	$250.00
Administrative Order	$250.00
Notice of Violation/Compliance Meeting	$500.00
Publication Of Significant Non-Compliance	$1000.00
Revocation of Permit	$2000.00

All Charges within this schedule shall be in addition to any costs incurred by The City of Garden City, such as any administrative or monitoring costs.

GARDEN CITY PUBLIC WORKS DEPARTMENT

Policy and Procedure

Chapter:	8 Environmental	Number:	8.5
Subject:	Commercial Industrial Vehicle, Boat, Recreational Vehicle (RV) and Equipment Cleaning Enforcement Policy & Procedure		
Used By:	Environmental Division		
Issued:	4-25-2011	Revised:	

Purpose: To provide appropriate & consistent educational and enforcement responses to commercial and/or industrial outdoor cleaning practices. To be consistent with the current Idaho DEQ Catalog of Stormwater Best Management Practices for Idaho Cities and Counties, City Code, State and Federal Regulations i.e. G.C.C. §§ 4-14-2; 4-14-3; 4-14-5; 4-14-6; 4-14-10; 4-14-11 and IDEQ Stormwater BMP's # 7, 20 & 21. To protect the ground water, waters of the State and the US, the POTW, the MS4 storm drain system & the environment.

Policy:

1. Environmental staff will educate & inform commercial/industrial facility representatives of the following:

    a. All commercial and/or industrial vehicle, RV, boat and equipment outdoor cleaning practices must comply with Garden City Code Title 4, Chapter 14 and the Idaho DEQ Catalog of Stormwater Best Management Practices (BMP's) for Idaho Cities and Counties.

        i. IDEQ Stormwater BMP's are enforceable under G.C.C. §§ 4-14-2 and 4-14-6.
        ii. Copies of IDEQ Stormwater BMP's # 7, #20 & #21 and excerpts from Title 4, Chapter 14 will be provided to facility representatives.
        iii. The entire Idaho DEQ Catalog of Stormwater Best Management Practices for Idaho Cities and Counties is available at: http://www.deq.idaho.gov/water/data_reports/storm_water/catalog/entire.pdf

    b. Washing vehicles, RV's and equipment outdoors or in areas where wash water flows onto the ground can pollute stormwater and ground water.
        i. It is allowable to rinse down the body of a vehicle or RV outdoors with just cold water without implementing any BMPs.
        ii. Only storm water discharges are allowed to the MS4 storm drain system.

iii. Outdoor steam cleaning, pressure washing and washing with hot water and/or soap, detergent or other cleaning chemicals is prohibited unless conducted as per IDEQ Stormwater BMP's # 7, #20 & #21.

2. Once the education & information protocol described above has been performed, continued non – compliance shall result in appropriate enforcement actions as per City Code & Policy.

Risk: Loss or damage to human health & the environment. Increased liability and/or potential litigation. Non - compliance with Local, State & Federal Regulations.

Attachments:

- ✓ 8.5.0- Garden City Code Title 4, Chapter 14 excerpts
- ✓ 8.5.1-IDEQ Storm water BMP's # 7
- ✓ 8.5.2- IDEQ Storm water BMP's #20
- ✓ 8.5.3- IDEQ Storm water BMP's #21

Director of Public Works Signature

4-25-11

Date

Vehicle and Equipment Cleaning — BMP 7

Description

Prevent or reduce the discharge of pollutants to stormwater from vehicle, equipment, and tool cleaning.

Approach

- Consider using off-site commercial washing and steam cleaning businesses.
- Use designated wash areas, that are covered and bermed to prevent contact with stormwater, to contain wash water.
- Discharge wash water to the sanitary sewer only after contacting local wastewater treatment plant staff to find out if pretreatment is required.
- Consider filtering and recycling wash water.

Limitations

Steam cleaning can generate significant pollutant concentrations and may require permitting, monitoring, pretreatment, and inspections. Contact local wastewater treatment plant staff for additional information. The guidelines described in this fact sheet are insufficient to address all the environmental impacts and compliance issues related to steam cleaning.

Maintenance Requirements

- Repair and patch berms as needed.
- Inspect and maintain holding tanks, oil/water separators, and on-site treatment or recycling units regularly.

Additional Information

- Washing vehicles and equipment outdoors or in areas where wash water flows onto the ground can pollute stormwater and ground water. If your facility washes or steam cleans a large number of vehicles or pieces of equipment, consider contracting out this work to a commercial business. These businesses are better equipped to handle and dispose of the wash water properly. Contracting out this work can also be economical by eliminating the need for a separate washing/ cleaning operation at your facility.
- Steam cleaning and washing should be conducted on-site only if the site is equipped to capture all the water and other wastes. If washing/cleaning must occur on-site, wash vehicles inside the building to direct the liquid to an area where it can be pretreated to remove pollutants and subsequently discharged to the sanitary sewer.
- Properly dispose of all sludge left in tanks, containers, trucks, and holding tanks. Avoid discharging sludge to the storm drain system. Limit the amount of water used and recycle wash water if possible.
- Conduct outside washing operations in a designated wash area. Make sure the area has the following:
  - ✓ It is designated clearly.
  - ✓ It is paved with concrete.
  - ✓ It is covered and bermed to prevent contact with stormwater.
  - ✓ It is sloped for wash water collection.
  - ✓ It is connected to the sanitary sewer or to a dead-end holding tank.
  - ✓ It is equipped with an oil/water separator.

Auto Repair and Maintenance Controls BMP 20

Description

Many common vehicle maintenance and washing routines contribute to environmental pollution. Businesses that are unable to comply with the guidelines should have their vehicles washed at a commercial establishment that conforms to the specifications, or by a mobile washer that conforms to specifications.

General Information

Interior Shop Area Cleaning

- Do not hose down your shop floor into streets or parking lots. It is best to dry sweep regularly.
- Use nontoxic cleaning products. Baking soda paste works well on battery heads, cable clamps and chrome; mix the soda with a mild, biodegradable dishwashing soap to clean wheels and tires; for windows, mix white vinegar or lemon juice with water.
- To reduce or eliminate the generation of waste, fix sources of drips or leaks where possible. Routinely inspect the engine compartment, and regularly replace worn seals on equipment.
- To avoid or control spills and leaks do the following:
  - ✓ Prepare and use easy to find spill containment and cleanup kits. Include safety equipment and cleanup materials appropriate to the type and quantity of materials that could spill.
  - ✓ Pour kitty litter, sawdust, or cornmeal on spills.
  - ✓ NEVER sweep or flush wastes into a sanitary sewer or storm drain.
- Change fluids carefully. Use a drip pan to avoid spills. Prevent fluid leaks from stored vehicles. Drain fluids such as unused gas, transmission and hydraulic oil, brake and radiator fluid from vehicles or parts kept in storage. Implement simple work practices to reduce the chance of spills.
- Use a funnel when pouring liquids (like lubricants or motor oil) and place a tray underneath to catch spills. Place drip pans under the spouts of liquid storage containers. Clean up spills immediately.

Fleet Vehicle Washing

It is allowable to rinse down the body of a vehicle with just cold water without implementing any BMPs. Designated wash areas should be well marked with signs indicating where and how washing should be done. Any inlets to the storm drain should be marked DUMP NO WASTE.

If you use soaps or detergents, or heated water, or if you wash/rinse the engine compartment or the underside of the vehicle, you should use one of the following BMPs:

- Use a storm drain cover or other effective method of preventing all wash and rinse water from entering a storm drain or other drainage feature. All runoff from the activity should be collected for proper disposal in a sanitary sewer. There are several products commercially available that enable collection of runoff. This guideline also applies to mobile vehicle washing services.

- Wash water runoff and excess soapy water should be collected and pumped or otherwise discharged as follows:
  - ✓ Sanitary sewer - Pump into sanitary system clean out/sink or into an on-site private sanitary sewer manhole; verify with the facility manager that it is not a storm drain manhole. Solids separation will be required before disposal to prevent clogging the system.
  - ✓ Landscape or soil area (Note: Be aware that soapy wash water may adversely affect landscaping) - Discharge should be directed to an area sufficient to contain all the water. Discuss the practices with property owner. Acceptable for minimum discharge flows only. Repetitive use of the same area or excessive wash volume to the same area may be illegal.
- If disposal to the sanitary sewer and/or to a landscaped area is not possible, then contract with a company capable of hauling the wash water off-site to an authorized disposal site.
- There may be some unavoidable evaporation from paved surfaces. If a significant amount of washwater runoff evaporates at the site before it can be collected, and the site is routinely used for this purpose, the paved area itself should be cleaned every six months, or at the end of the wash service contract, whichever comes first. Any wash water used during this procedure should be collected and discharged to a sanitary sewer.

Cleaning/Degreasing Engines, Equipment, and Auto/Truck Drive Trains

- Clean with or without soap, no storm drain disposal is allowed.
- Requires treatment before discharge to the sanitary sewer system is allowed. Because it is likely that pollutants (petroleum products and metals) are concentrated in these wash waters, the local wastewater treatment plant will require some type of treatment before discharge into the sanitary sewer. Contact the local wastewater treatment plant for requirements and additional information.
- If a sanitary sewer is not available or treatment of the washwater is not feasible, then contact a company capable of hauling (i.e., tanker truck) the washwater off-site to dispose of it at an authorized site.

GARDEN CITY PUBLIC WORKS DEPARTMENT

Policy and Procedure

Chapter:	8 Environmental	Number:	8.6
Subject:	Mobile and Surface Cleaning Control Practices Enforcement Policy & Procedure		
Used By:	Environmental Division		
Issued:	4-25-2011	Revised:	

Purpose: To provide appropriate & consistent educational and enforcement responses to Mobile and Surface Cleaning Control Practices. To be consistent with the current Idaho DEQ Catalog of Stormwater Best Management Practices for Idaho Cities and Counties, City Code, State and Federal Regulations i.e. G.C.C. §§ 4-14-2; 4-14-3; 4-14-5; 4-14-6; 4-14-10; 4-14-11 and IDEQ Stormwater BMP #21. To protect the ground water, waters of the State and the US, the POTW, the MS4 storm drain system & the environment.

Policy:

1. Environmental staff will educate & inform commercial/industrial facility representatives and operators of Mobile and Surface Cleaning companies of the following:

    a. All mobile and surface cleaning practices must comply with Garden City Code Title 4, Chapter 14 and the Idaho DEQ Catalog of Stormwater Best Management Practices (BMP's) for Idaho Cities and Counties.

        i. IDEQ Stormwater BMP's are enforceable under G.C.C. §§ 4-14-2 and 4-14-6.
        ii. Copies of IDEQ Stormwater BMP #21 and excerpts from Title 4, Chapter 14 will be provided to facility representatives.
        iii. The entire Idaho DEQ Catalog of Stormwater Best Management Practices for Idaho Cities and Counties is available at http://www.deq.idaho.gov/water/data_reports/storm_water/catalog/entire.pdf

    b. Washing parking lots, sidewalks, buildings vehicles, RV's, boats and equipment outdoors or in areas where wash water flows onto the ground can pollute stormwater and ground water.
        i. Only storm water discharges are allowed to the MS4 storm drain system.
        ii. Mobile and Surface Cleaning is prohibited unless conducted as per IDEQ Stormwater BMP #21 and Garden City Code.

2. Once the education & information protocol described above has been performed, continued non – compliance shall result in appropriate enforcement actions as per City Code & Policy.

Risk: Loss or damage to human health & the environment. Increased liability and/or potential litigation. Non - compliance with Local, State & Federal Regulations.

Attachments:

- ✓ 8.5.0- Garden City Title 4, Chapter 14 excerpts
- ✓ 8.5.3- IDEQ Storm water BMP's #21

Director of Public Works Signature

4-25-11

Date

Mobile and Surface Cleaning Control Practices BMP 21

Description

This activity applies to mobile steam cleaning and vehicle washing operations. It also applies to many common surface cleaning and washing routines including pressure washing of large objects such as building facades, fences and masonry, rooftops and boats on a site-to-site basis.

Application

- These practices apply to anyone who generates wastewater from pressure washing, including:
  - ✓ Contractors that provide a pressure washing service to others.
  - ✓ Businesses that use pressure washing equipment as part of their operations or maintenance (such as cleaning heavy equipment).
  - ✓ Homeowners.

Limitations

The BMPs in this section do not apply if there has been oil or other hazardous material spilled on the site. In case of a spill, contact the local fire department for guidance.

General Information

General Controls

- Establish regular sweeping and litter pick up routines, preferably daily but at least once a week.
  - ✓ Use a broom and dispose of waste in the trash.
  - ✓ Sweeping, blowing or hosing cigarette butts and other litter into the street is not allowed.
- Illicit connections to the storm drain system should be eliminated.
- Employees should be educated to control washing operations to prevent stormwater contamination.
- Prior to beginning washing activities, determine what collection method you will be using and how you intend to properly dispose of the wastewater generated from each cleaning activity.

Washing Practices: See Table 1 below for guidelines for specific types of surfaces and conditions.

Pressure Washing, General

- All runoff should be collected and disposed of properly, or filtered to remove pollutants. No runoff should leave the site.
- Temporary curbs, dikes or berms can be used to direct the water to one or more collection areas. Catch basin covers can help facilitate collection.
- If the pressure washing wastewater does not collect in a centralized area, such as when the area is very flat or you are on a grassed area, a tarp or sheet should be placed under the washing area to collect paint chips and other debris that is loosened by the spray.

Washing Practices (With Soap)

- Seal storm drains. No storm drain disposal of washwater is allowed.
- Use the least toxic detergents and cleaners that will get the job done.

Select non-phosphate detergents when possible.

- Use wash pads that capture the washwater. Solids separation is required before disposal. Ideally, a separate wash area that captures the washwater should be established, or use of temporary wash pads that can be drained to the sanitary sewer are acceptable.
- Washwater runoff and excess soapy water should be collected and pumped or otherwise discharged as follows.
  - ✓ Pump it into a sanitary sewer system clean-out/sink or into an on-site private sanitary sewer manhole; verify with the facility manager that it is not a storm drain manhole. Solids separation will be required before disposal to prevent clogging the system.
  - ✓ Washwater may be discharged into landscaped areas or graveled areas. Discharge should be directly to an area sufficient to contain all the washwater. Discuss this practice with the property owner. This practice is acceptable for minimal discharge flows only. Repetitive use of the same area or excessive wash volume to the same area may be illegal. (Note: Be aware that soapy washwater may adversely affect landscaping).
  - ✓ If disposal to the sanitary sewer and/or a landscaped area is not possible, then discharge to a holding tank and contract with a company capable of hauling the washwater off-site to an authorized disposal site.

Table 1. Cleaning of Large Surfaces and Structures

Type of Surface	Characteristics	Cleaning Technique	Discharge to Storm Drain	Disposal Alternatives
Sidewalks, Plazas	No oily deposits	Sweeping, collecting and disposing of debris and trash; then washing without soap.	Okay to discharge to storm drain	
Sidewalks, Plazas, Driveways, Drive-Through Windows	Light oily deposits	Sweeping, collecting and disposing of debris and trash. Cleaning oily spots with absorbent; place oil-absorbent boom around storm drain, or a screen or filter fabric over inlet; washing without soap.	Okay to discharge to storm drain, provided an oil-absorbent boom or filter fabric is used. No oily sheen should be visible in the water draining into the storm drain.	
Sidewalks, Plazas, Driveways	Light oily deposits	Sweeping , collecting and disposing of debris and trash. Cleaning oily spots with absorbent; washing with soap.	Seal storm drains. Cannot be discharged to the storm drain.	Vacuum/pump wash water to a tank or discharge to sanitary sewer.

Type of Surface	Characteristics	Cleaning Technique	Discharge to Storm Drain	Disposal Alternatives
Parking lots and driveways, drive-throughs, parking garages, service stations	Heavy oily deposits	Sweeping, collecting and disposing of debris and trash. Cleaning oily spots with absorbent materials.	Seal storm drains. Cannot be discharged to the storm drain.	Vacuum/pump wash water to a tank or discharge to sanitary sewer.
Building exteriors and walls	Glass, steel, or painted surfaces (post 1978: no lead in paint)	Washing without soap.	Okay to discharge to storm drain provided the drain is sealed first with a fabric filter to capture dirt, paint particles and disposed of properly.	Can alternately be sent to soil or landscaped areas.
Building exteriors and walls	Glass, steel, or painted surfaces (post 1978: no lead in paint)	Washing with soap.	Seal storm drains. Cannot be discharged to the storm drain.	Vacuum/pump wash water to a tank or discharge to sanitary sewer.
Building exteriors	Painted with lead-based or mercury-additive paint	Washing with or without soap.	Seal storm drains. Cannot be discharged to storm drain.	Vacuum/pump to a tank. Check with POTW for discharge to sanitary sewer.
Graffiti Removal	Graffiti	Using wet sand blasting. Minimize use of water; sweep debris and sand.	Can be discharged to storm drain if washwater is filtered through a boom.	Can alternately be directed to landscaped areas.
		Using high pressure washing and cleaning compounds.	Seal storm drains. Cannot be discharged to storm drain.	Vacuum/pump washwater to sanitary sewer. Check with POTW about pretreatment.
Masonry	Mineral deposits	Acid washing	Seal storm drains. Cannot be discharged to storm drain.	Rinse treated area with alkaline soap and direct washwater to landscaped or dirt areas. Alternately, washwater may be collected and neutralized to a pH between 6 and 10, then discharged to landscaping or pumped to sanitary sewer.

GARDEN CITY PUBLIC WORKS DEPARTMENT

Policy and Procedure

Chapter:	8 Environmental	Number:	8.9
Subject:	Garden City Non-Stormwater Disposal Best Management Practices		
Used By:	Environmental Division		
Issued:	02/25/2013	Revised:	

Purpose: To provide appropriate and consistent educational and enforcement responses to commercial and/or industrial businesses engaged in outdoor cleaning practices.

To provide a Garden City Policy consistent with the Federal Clean Water Act, Garden City Code, The State of Idaho Stormwater Best Management Practices and Boise City Non-Stormwater Disposal Best Management Practices.

Regulatory Authority: Garden City Code § 4-14: Stormwater Management and Discharge Control provides the authority to adopt and enforce State and regional BMP requirements. G.C.C. § 4-14-6 Compliance with BMPs states:

> "Where BMP requirements have been promulgated by any federal, state of Idaho, regional, city, county and/or local entity, for any activity, operation, or facility which may cause or contribute to storm water pollution and/or illicit discharges to the storm water system, every person undertaking such activity or operation, or owning or operating such facility shall comply with such requirements..."

Policy:

1. The Environmental Division will reference the Boise City Non-Stormwater Disposal Best Management Practices and the Idaho Department of Environmental Quality Catalog of Stormwater Best Management Practices for Idaho Cities and Counties in order to prevent stormwater pollution and illicit discharges to the MS4 storm drain system.

2. Environmental staff will educate & inform commercial/industrial facility representatives of the non-stormwater disposal best management practices and enforce compliance with G.C.C. § 4-14.

3. While conducting routine periodic stormwater inspections, Environmental staff will provide the following educational materials to facility representatives:
   i. Excerpts from G.C.C. § 4-14 Stormwater Management and Discharge Control
   ii. Boise City Non-Stormwater Disposal Best Management Practices. Also available at:

http://publicworks.cityofboise.org/media/219227/22375_StormwaterNon-stwaterDisposalBMPGuidebook.pdf

iii. IDEQ Catalog of Stormwater Best Management Practices for Idaho Cities and Counties. The full catalog is available at: http://www.deq.idaho.gov/media/622263-Stormwater.pdf. The following BMPs may be provided depending on type of facility:
   a. BMP #7: Vehicle and Equipment Cleaning
   b. BMP #20: Auto Repair and Maintenance Controls
   c. BMP #21: Mobile and Surface Cleaning Control Practices

Attachments:

- Excerpts from G.C.C. § 4-14 Stormwater Management and Discharge Control
- Boise City Non-Stormwater Disposal Best Management Practices
- IDEQ Catalog of Stormwater Best Management Practices for Idaho Cities and Counties

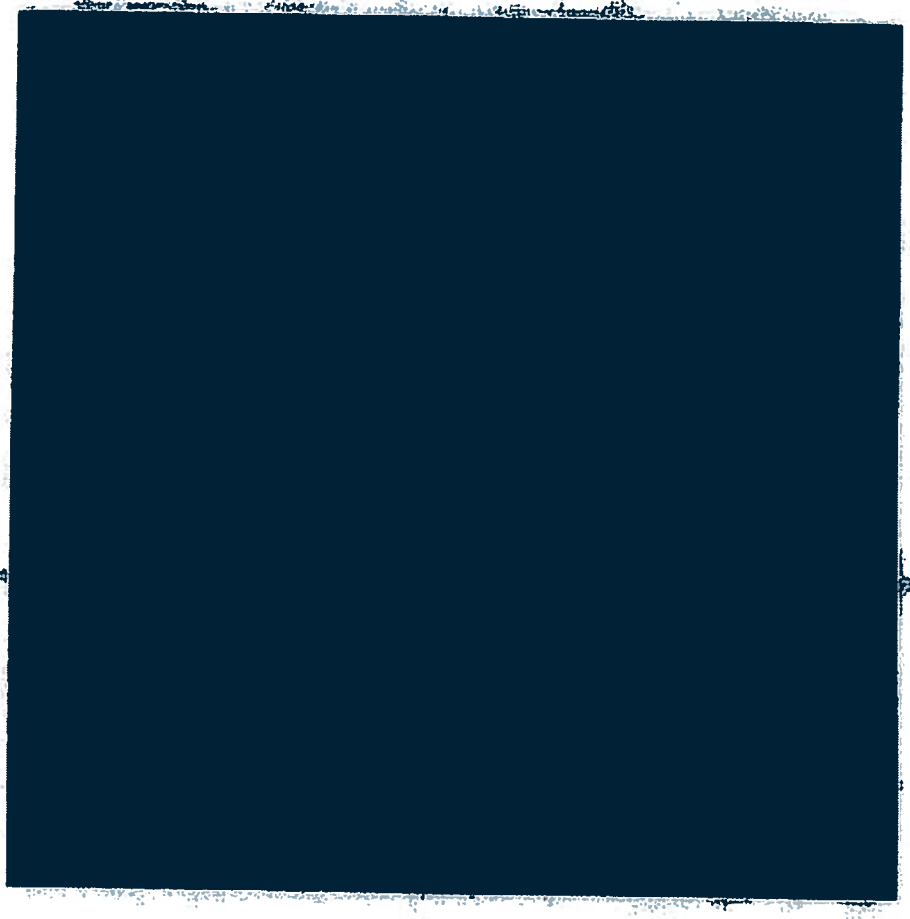
Risk: Loss or damage to human health & the environment. Increased liability and/or potential litigation; non-compliance with Local, State, & Federal Regulations.

_____ 2-26-13

Public Works Director Signature **Date**

Stormwater

Boise City Non-Stormwater Disposal Best Management Practices



REV. JUNE 2006

GENERAL REQUIREMENTS

PURPOSE

The purpose of this HANDBOOK is to define minimum requirements for non-stormwater storm drain uses within Boise City. The HANDBOOK establishes practices to reduce pollutants in non-stormwater storm drain uses.

This HANDBOOK presents stormwater best management practices (BMPs) for storm drain uses regulated by Boise City. However, these BMPs will not apply for all situations. Compliance with these BMPs does not relieve those that discharge to storm drains the responsibility to comply with additional regulations established by federal, state, and other local agencies owning and operating municipal separate storm sewer systems (MS4s). Local agencies owning and operating portions of MS4s in Boise include, but are not limited to: the Ada County Highway District, Ada County Drainage District No. 3, Boise State University, and Idaho Department of Transportation District 3. Garden City also has stormwater management responsibilities within the Boise region.

MODIFICATIONS & ADDENDUM

This HANDBOOK shall be revised and updated as necessary and as approved by the Boise City Council to reflect corrections and advances in the fields of storm drain protection and water resources management. Users who request changes to the HANDBOOK shall provide data to Boise City that supports justification for the change.

AUTHORITY

The Clean Water Act of 1972, as amended in 1987, prohibits the discharge of pollutants into waters of the United States unless the discharge is in compliance with the National Pollutant Discharge Elimination System (NPDES) permit. And, Boise City is subject to the Phase 1 Stormwater NPDES permitting requirements. These federal regulations require Boise City to control pollutants in stormwater discharges to the "maximum extent practicable" (MEP) standard. MEP means the technology-based standard established by Congress in Clean Water Act section 402(p)(3)(B)(iii). The MEP standard generally emphasizes pollution prevention and source control BMPs in combination with structural or system treatment methods serving as a backup.

Within this regulatory context, Boise City has established BMPs that reduce pollutants that may be carried in stormwater runoff. Please be aware that other Boise City programs have also established stormwater BMPs that are required for new development and significant redevelopment, construction site discharge controls, and other pollution prevention programs.

Laws that provide Boise City with the authority to regulate drainage within the city's jurisdiction include, but are not limited to:

- Constitutional authority as a municipal corporation to promulgate

regulations governing the discharge of stormwater;

- Boise City's Stormwater Management and Discharge Control Ordinance, Chapter 8-15 of the Boise City Code (1994, revised 2000, 2004 revision pending) gives the City the authority to regulate stormwater runoff quality;
- Idaho code 50-332 and 50-333 give Boise City authority to control and secure the city's drains; and,
- Idaho code 67-6518 authorizes the City to adopt standards for storm drains.

GENERAL STORMWATER REQUIREMENTS

The Boise City Council has adopted the Stormwater Management and Discharge Control Ordinance to "protect and enhance the water quality of our watercourses, water bodies, groundwater, and wetlands..." and to "control non-stormwater discharges to storm drains and reduce pollutants in stormwater discharges" (BCC 8-15-01.2).

Section 8-15-02.6 identifies that "discharges from the following activities will be allowed subject to application of 2004 Boise City Non-Stormwater Disposal Best Management Practices:"

- Water line flushing and other discharges from potable water sources;
- Landscape irrigation and lawn watering;
- Irrigation water;
- Diverted stream flows;
- Rising ground waters;
- Uncontaminated groundwater infiltration to storm drains;
- Uncontaminated pumped ground water;
- Foundation and footing drains;
- Roof drains;
- Water from crawl space pumps;
- Residential air conditioning condensation;
- Springs;
- Individual residential and non-profit group car washes;
- Flows from riparian habitats and wetlands;
- De-chlorinated swimming pool discharges; and,
- Flows from fire fighting activities and training.*

**Emergency use of storm drains may occur as needed, however fire training activities are subject to the discharge BMP requirements listed.*

And, the following Boise City general stormwater requirements apply to these and all other storm drain uses:

- Use all reasonable measures to reduce pollutants entering storm drains (e.g., litter, detergents, waste, oil, grease, fertilizers, etc.);

- Store grease, oil, de-icing materials, and hazardous and non-hazardous substances to prevent leaks and spills from entering storm drains;
- Maintain pavement, sidewalks, parking lots, gas stations, and streets or roads to prevent the accumulation of pollutants that may enter storm drains; and,
- Do not throw any pollutant into any body of water except as otherwise permitted under local, state, or federal law.

PROPERTY CLEANING

Property cleaning and maintenance activities can deliver pollutants such as heavy metals, oil and grease, and toxic chemicals to storm drains. When these pollutants enter storm drains they flow to the Boise River or into ground water. BMPs, when applied, are able to reduce pollutants from this urban runoff. Boise City has established the following property cleaning BMPs to reduce the discharge of pollutants.

1. Routine property maintenance that includes litter control, frequent sweeping, and on-going spill containment and clean-up using dry clean-up methods is recommended and may help reduce the frequency of a more thorough pavement cleaning.
2. Sweep paved area to be cleaned just prior to cleaning and dispose of soil and debris in trash or landscaping.
3. Do not discharge wash water from steam cleaning* or laden with detergents or cleaning chemicals to storm drains. Wash water with soap, even biodegradable soap, is not allowed into storm drains because of the foam it may create. Direct small amounts of this type of wash water onto landscaped areas for infiltration or collect and dispose of the wash water into Boise City sanitary sewer.
4. Minimizing the overall amount of water used for cleaning is encouraged (e.g., high-pressure washing). Small discharge amounts can be directed onto adjacent landscaped areas.
5. Place filters for debris sediment, and oil and grease hydrocarbon booms or pads around storm drain inlets or access points if these materials are present, or apply other suitable BMP technology. There should be no visible sheen on the discharge entering the storm drain.
6. Any stormwater or groundwater discharges to sanitary sewer must have prior approval through Boise City Public Works and may be subject to permitting under the City's pretreatment program. *Call 384-3991 or 384-3993 for more information.*

** High pressure, hot water cleaning discharges to storm drains are subject to all of the discharge BMP requirements listed.*

BEST MANAGEMENT PRACTICES

Commercial and industrial facilities must manage stormwater consistent with federal, state, and local requirements. To determine which BMP to use, the activities that occur at the facility must be identified. The BMP Directory has been developed to guide commercial and industrial facility operators to the applicable BMPs.

BMP DIRECTORY

	EXAMPLES:	
1. Are there any non-stormwater discharges to drains?	• Process wastewater • Cooling waters • Wash water • Sanitary wastewater	**No** ☐ **Yes** ☐ ▶ *See Section 1 and Section 2*
2. Does outdoor storage, materials loading, unloading, or transfer occur for any raw materials, finished goods, wastes, or other substances?	• Outdoor loading dock • Liquids • Bulk liquids or solids	**No** ☐ **Yes** ☐ ▶ *See Section 1 and Section 3*
3. Are there any vehicle or equipment practices conducted outdoors on this site?	• Fueling • Routine maintenance, repair, painting • Washing, steam cleaning • Manufacturing	**No** ☐ **Yes** ☐ ▶ *See Section 1 and Section 4*
4. Are building exteriors (including windows, roof gutters, rooftops, etc.) and grounds (including sidewalks, pools, gutters, etc.) maintained?	• Landscaping • Pesticide use • Washing, painting • Pools	**No** ☐ **Yes** ☐ ▶ *See Section 1 and Section 5*
5. Can materials used, stored on-site, or contained in equipment accidentally spill?	• Outdoor loading/unloading, storage • Vehicle or equipment maintenance • Building or landscape maintenance materials	**No** ☐ **Yes** ☐ ▶ *See Section 1 and Section 6*
6. Are there any building or equipment repairs, remodeling, or construction activities occurring on-site?	• Erodible surface areas • Temporary outdoor storage • Sandblasting • Painting • Equipment repair/replacement	**No** ☐ **Yes** ☐ ▶ *See Section 1 and Section 7*
7. Are there any stormwater facilities on-site?	• Catch basins • Conveyance ditches • Sumps • Gutters • Drains	**No** ☐ **Yes** ☐ ▶ *See Section 1 and Section 8*

BEST MANAGEMENT PRACTICES

Section 1

GENERAL BMPs
Applicable to all industrial and commercial businesses

REQUIRED ■

- **Train employees to protect storm drains and to use good housekeeping techniques.[1] See the Disposal Alternatives table for more information.**
- **Conduct property cleaning in accordance with the BMPs identified.**
- **Prevent and, depending on the material, clean up spills immediately using dry cleanup methods. See the Disposal Alternatives table for more information.**
- **Depending on the type and quantity of materials present, maintain spill cleanup kits in all activity areas. *For more information contact Boise City Public Works at 394-3901.***
- **Review the materials you have at your facility and whether there are specific regulations pertaining to their use and disposal (i.e., hazardous materials).**

RECOMMENDED ●

- Conduct regular inspections and self audits to identify hazardous materials and activities that impact stormwater.
- Mark storm drains with a "Dump No Waste" message to identify stormwater drains and to prevent non-stormwater discharges.
- Look for ways to reduce, reuse, and recycle materials and use non-toxic or the least toxic materials available.
- Locate business activities indoors or in designated areas away from a gutter or storm drain to prevent stormwater from running onto and off of the site. Or, cover the activity, use curbing or berms, pave the work surface, and provide secondary containment with drainage to a treatment system or dead-end sump.
- Preserve and maintain existing on-site vegetation.

[1] *Good housekeeping includes: spill prevention, control, and cleanup; equipment and storage area inspection; and proper disposal of both hazardous waste and non-hazardous waste. See the Disposal Alternatives table for more information.*

Section 2

Non-Stormwater Discharges

REQUIRED ■

- **Eliminate illicit connections to the storm drainage system by inspection, piping schematic review, smoke testing, or dye testing. Contact the Boise City Public Works Pretreatment Program or the local sewer district for more information about connecting to and using the sanitary sewer system.**
- **Train employees on how to properly dispose of non-stormwater discharges. See the Disposal Alternatives table for more information.**

RECOMMENDED ●

- Eliminate or reduce non-stormwater discharges to the stormwater collection system by isolating problem areas or re-plumbing to sanitary sewer lines in accordance with local sanitary sewer requirements.
- Provide well-marked procedures for proper disposal or collection methods for wastewater to prevent storm drain use violations.

BEST MANAGEMENT PRACTICES

Section 3

Outdoor Storage and Loading Practices

REQUIRED ■

LOADING AND UNLOADING:

- **Install safeguards against accidental releases such as overflow protection devices and protection guards around tanks and piping.**
- **Train employees in spill control and clean up procedures.**

CONTAINER, BULK, AND WASTE STORAGE:

- **Clearly label containers or tanks and place them in a designated storage area with secondary containment.**
- **Take steps to prevent unauthorized entry into the storage area.**
- **Inspect tanks, drums, containers, and equipment regularly for leaks or spills.**
- **Store and maintain spill cleanup materials near the storage area.**

RECOMMENDED ●

LOADING AND UNLOADING:

- Load and unload toxic materials indoors. If this is not possible, then it is recommended to cover the outside loading and unloading docks to reduce exposing materials to rain.
- Use drip pans and/or absorbent materials to catch leaks or spills under hoses and pipe connections, when transferring liquids, or if material is removed directly from tanks and containers.

CONTAINER, BULK, AND WASTE STORAGE:

- Cover bulk solid materials (gravel, sand, lumber, etc.) and protect from rain or stormwater run-on.

Section 4

Vehicle and Equipment Practices, Processing, Manufacturing

REQUIRED ■

VEHICLE WASHING:

- **When washing with detergents use designated wash areas that drain to either a sanitary sewer or an appropriate on-site treatment system.**

FUELING:

- **Connecting fuel-island drains to the sanitary sewer is prohibited. *Consult Boise City Pretreatment Program at 384-3991 for information.***
- **Install automatic shutoff protection devices on hoses. *Consult Boise City Fire Marshall at 384-3950 for information.***

MAINTENANCE, REPAIR, & PAINTING:

- **Connect the process equipment area to either the sanitary sewer or the facility wastewater treatment system. Contact the Boise City Public Works Department before connecting to a system.**
- **Install a spill/drip collection system and secondary containment in the fueling area. Ensure that the fueling area drains to a treatment system designed for petroleum products. *Consult Boise City Fire Plan Review at 395-7809 for information.***
- **Label and store recycling greases, used oil or oil filters, antifreeze, cleaning solutions, auto batteries, hydraulic fluids and transmission fluids separately.**

(Continued on page 8)

BEST MANAGEMENT PRACTICES

Section 4 (con't)

Vehicle and Equipment Practices, Processing, Manufacturing

- Properly dispose of mercury-containing equipment (e.g., switches) and other hazardous waste.
- Inspect process lines for leaks or malfunctions regularly and repair leaks or malfunctions promptly.
- Ensure oil filters are drained before recycling or adding to solid waste.
- Sweep processing areas frequently. Avoid hosing down the areas to a storm drain.

OPERATIONS AND MANUFACTURING:

- Connect the process equipment area to either the sanitary sewer or the facility wastewater treatment system. Consult Boise City Public Works Department before connecting to a system.

RECOMMENDED ●

VEHICLE WASHING:

- Consider taking vehicles and equipment to commercial wash and steam cleaning businesses. Or, consider filtering and recycling wash water.
- If washing with detergents, use phosphate-free detergents.
- Looks for ways to reduce the amount of water used when washing vehicles and equipment.

FUELING:

- Avoid "topping off" of fuel tanks.

MAINTENANCE, REPAIR, & PAINTING:

- Use drip pans underneath vehicles and equipment when performing maintenance or when putting vehicles or equipment into storage.
- Consider having the mercury switches in your auto fleet changed to non-mercury by a certified mechanic.
- Reduce solvent use by using a wire brush or a bake oven to clean parts and equipment.
- Sweep or use a shop vacuum to clean up sanding metal or Bondo. For safety purposes never use a shop vacuum for cleaning up flammable liquids.
- Allow debris from wet sanding activities to dry overnight if possible and either sweep or vacuum the debris, or invest in sanding equipment that has an attached vacuum system.

OPERATIONS AND MANUFACTURING:

- Inspect process lines for leaks or malfunctions regularly, and repair promptly. Place drip pans underneath potential leak points.

Section 5

Outdoor Maintenance Practices

REQUIRED ■

LANDSCAPING:

- Ensure employees are trained in spill control and cleanup procedures.
- Use pesticides according to the manufacturer's recommendations. Train employees to use pesticides properly to prevent accidents.
- Store and maintain spill clean up materials near pesticide storage areas. Ensure employees are trained in spill control and clean up procedures.
- Properly dispose of debris daily.
- When possible discharge pool or spa water to the sanitary sewer. For information about connecting to and using the sanitary sewer system contact the Boise City Public Works Pretreatment Program or the local sewer district. Otherwise, these

(Continued on page 9)

BEST MANAGEMENT PRACTICES

Section 5 (con't)

Outdoor Maintenance Practices

discharges can be directed to an adjacent storm drain after the chlorine residual has been reduced (e.g., wait three days or test to see if is around 1.0 parts per million (ppm) according to a colorimetric chlorine test kit), and when litter and debris have been swept up so they do not enter the storm drain.

STRUCTURE MAINTENANCE:

- Collect trash and yard debris and dispose of properly as needed.
- Store paints, solvents, and other maintenance materials in a covered area.
- Install secondary containment where required.
- Inspect and clean the storm drainage system as needed (e.g., twice a year) to ensure they operate as originally designed.
- When lead-based paint is present use ground or drop cloth under painting, scraping and during sandblasting activities. *Contact EPA 1-800-LEAD-FYI.*

RECOMMENDED ●

LANDSCAPING:

- Use integrated pest management practices where appropriate.
- Purchase only the amount of pesticides you need for your site.

STRUCTURE MAINTENANCE:

- Store and maintain spill cleanup materials near pesticide storage areas.
- Sweep the area frequently to avoid the accumulation of material. Avoid blowing trash, yard debris, or dust into a street or gutter.
- Establish an operation and maintenance schedule and track maintenance activities. List the contact person responsible for inspection and maintenance.
- When lead paint is not present, the use of a ground or drop cloth under painting, scraping and during sandblasting activities is encouraged.

Section 6

Spill Prevention, Control and Cleanup

REQUIRED ■

- Train employees in proper spill control and spill response procedures. Post spill response procedures as well as phone numbers.
- Regularly inspect and maintain spill cleanup kits in all activity areas.

RECOMMENDED ●

- Post spill response procedures so that they are both visible to staff and where spills may come in contact with stormwater.
- Utilizing the three-step cleanup process for spills and leaks is recommended:
  1. Always use dry methods to clean up spills. Clean spills with rags or other absorbent materials.
  2. Sweep the floor using a dry absorbent material.
  3. Mop the floor. If the mop water does not contain hazardous constituents, then it may be discharged to the sanitary sewer via a toilet, sink or floor drain. Contact the Boise City Public Works Department before discharging to the sanitary sewer.
- Inventory hazardous materials used, stored on site, or contained in equipment. Seek out ways to remove or replace non-essential hazardous materials wherever possible.

BEST MANAGEMENT PRACTICES

Section 7

Building and Equipment Repair, Remodeling, Construction, and Demolition

REQUIRED ■

GENERAL CONSTRUCTION:

- **Prevent sediment laden stormwater runoff during construction activities by complying with local and federal requirements.** ***Contact Boise City Planning and Development Services at 384-7169 for more information.***
- **Monitor subcontractors and employees to ensure they are practicing good housekeeping techniques and are aware of spill prevention, control, and cleanup procedures and proper waste disposal methods.**
- **Dispose of thermostats, fluorescent bulbs, and other mercury-containing equipment as hazardous waste.**

PAINTING:

- **Clean latex (water-based) paint brushes and equipment with water in a sink that is connected to the sanitary sewer.**
- **Clean oil-based paint brushes and equipment where waste paint and solvents can be collected and disposed as hazardous waste.**
- **When using lead-based paint use drop cloth under painting, scraping and during sandblasting activities.** ***Contact EPA 1-800-LEAD-FYI.***

RECOMMENDED ●

GENERAL CONSTRUCTION:

- Minimize disturbed soil exposure time and stabilize exposed soils by mulching, hydromulching, or using geotextiles.
- Inventory hazardous materials used, stored on site, or contained in equipment. Seek out ways to remove or replace non-essential hazardous materials wherever possible.
- Store materials under cover or in areas with secondary containment.
- Provide a gravel pad on-site for materials and equipment delivery.
- Stockpile soil, gravel, or other construction materials away from a street or storm drain.

PAINTING:

- Segregate wastes for recycling and/or disposal. See the Disposal Alternatives table for more information.
- When lead-based paint is not present, use of a ground or drop cloth under painting, scraping and during sandblasting activities is encouraged.

Section 8

Stormwater Facility Operation and Maintenance Issues

REQUIRED ■

- **Inspect and clean the storm drains, storm drain equipment, piping, valves, joints, and pavement as needed (e.g., twice a year) to ensure they operate as originally designed and to reduce stormwater pollution.**
- **Train employees to protect storm drains and to use good housekeeping techniques.[1] See the Disposal Alternatives table for more information.**

RECOMMENDED ●

- Store materials under cover or in areas with secondary containment.
- Establish an operation and maintenance schedule and track maintenance activities. List the contact person responsible for inspection and maintenance.
- For more information on stormwater system operation and maintenance, refer to the Boise City Stormwater Operation & Maintenance Resource Guide.

[1] *Good housekeeping includes: spill prevention, control, and cleanup; equipment and storage area inspection; and proper disposal of both hazardous waste and non-hazardous waste. See the Disposal Alternatives table for more information.*

DISPOSAL ALTERNATIVES TABLE

GENERAL CONSTRUCTION, PAINTING/STREET AND UTILITY MAINTENANCE

DISCHARGE/ACTIVITY	DISPOSAL TECHNIQUES
Excess oil-based paint	• Recycle/reuse; donate to nonprofit organization. • Dispose of as hazardous waste.
Excess water-based paint	• Recycle/reuse; donate to nonprofit organization. • For small quantities, let the paint residue dry in the cans; remove lid; dispose in trash. • For large quantities, solidify with cat latter, air dry, then dispose in trash.
Clean-up of Oil-based paint	• Wipe paint out of brushes, then: 1. Filter and reuse thinners and solvents. 2. Donate to nonprofit organization or dispose of as hazardous waste.
Clean-up of Water-based paint	• Wipe paint out of brushes, then: 1. Rinse to sanitary sewer. 2. Dispose in trash.
Empty paint cans (dry)	• Remove lids, dispose lids and cans in trash.
Paint stripping (with solvent)	• Dispose of as hazardous waste.
Exterior cleaning of buildings (no hazardous materials present)	• Please refer to Property Cleaning BMPs, page 4 of this handbook.
Exterior cleaning of buildings (mercury, chromium, or other hazardous materials in paints)	• Use dry cleaning methods (e.g., sand blasting). • Mop up wash water, reduce volume by evaporating liquid mixture. • Dispose of as hazardous waste. • No wash water or debris is to be left in the street and no discharge to storm drains is allowed.
Exterior cleaning of buildings (paint contains lead)	• Dispose of as hazardous waste. • *For assistance, contact EPA 1-800-LEAD-FYI.*
Paint scraping/sand blasting (no hazardous materials in paints)	• Dry sweep, dispose in trash.
Construction & demolition debris (no hazardous materials in debris, or for asbestos)	• Reduce/reuse concrete, wood, or other construction materials. • Transport to landfill as construction and demolition waste or for asbestos follow landfill packaging requirements. • *For assistance, contact Ada County Landfill at 577-4725.*
Construction & demolition debris (hazardous materials including thermostats, switches, fluorescent bulbs, etc.)	• Dispose of as hazardous waste. *Note: Fluorescent bulbs contain mercury and must not be broken or crushed.* • *For assistance contact Ada County Landfill at 577-4736.*

DISPOSAL ALTERNATIVES TABLE

BUILDING & PROPERTY MANAGEMENT/MAINTENANCE

DISCHARGE ACTIVITY	DISPOSAL TECHNIQUES
Leaking garbage dumpsters	• Collect and contain leaking material. • Repair leak; return to dumpster to BFI for repair. *Call BFI at 345-1265.*
Wash water from cleaning garbage dumpsters	• Filter wash waster through grease interceptor; *contact Boise City at 384-3991 or 384-3993* before discharging to sanitary sewer.
Exterior building and property (no hazardous materials present)	• Routine property maintenance that includes litter control, frequent sweeping, and on-going spill containment and clean-up using dry clean-up methods is recommended and may help reduce the frequency of a more thorough pavement cleaning. • Sweep paved area to be cleaned just prior to cleaning and dispose of soil and debris in trash or landscaping. • Do not discharge wash water from steam cleaning* or laden with detergents or cleaning chemicals to storm drains. Wash water with soap, even biodegradable soap, is not allowed into storm drains because of the foam it may create. Direct small amounts of this type of wash water onto landscaped areas for infiltration or collect and dispose of the wash water into the Boise City sanitary sewer. • Minimizing the overall amount of water used for cleaning is encouraged (e.g., high-pressure washing). Small discharge amounts can be directed onto adjacent landscaped areas. • Place filters for debris sediment, and oil and grease hydrocarbon booms or pads around storm drain inlets or access points if these materials are present, or apply other suitable BMP technology. There should be no visible sheen on the discharge entering the storm drain. • Any stormwater or groundwater discharges to sanitary sewer must have prior approval through Boise City Public Works and may be subject to permitting under the city's pretreatment program. *Call 384-3991 or 384-3993 for more information.* **High pressure, hot water cleaning discharges to storm drains are subject to all of the discharge BMP requirements listed.*
Exterior building and property cleaning (mercury, chromium, or other hazardous materials in paints)	• Use dry cleaning methods (e.g., sand blasting). • Mop up wash water, reduce volume by evaporating liquid mixture. • Dispose of as hazardous waste, *contact Ada County Landfill at 577-4736.* • No wash water or debris is to be left in the street and no discharge to storm drains is allowed.
Exterior building and property cleaning (paint contains lead)	• Dispose of as hazardous waste. • *For assistance, contact EPA 1-800-LEAD-FYI.*
Fluorescent light bulbs	• Dispose of as hazardous waste. *Note: Fluorescent bulbs contain mercury and must not be broken or crushed.* • *For assistance, contact Ada County Landfill at 577-4736.* **Some manufacturers produce low mercury bulbs that, with additives, may not characterize as hazardous waste. Testing prior to disposal is necessary to verify compliance with federal universal waste regulations.*

DISPOSAL ALTERNATIVES TABLE

VEHICLE MAINTENANCE

DISCHARGE/ACTIVITY	DISPOSAL TECHNIQUES
Used motor oil	• Use secondary containment while storing; send to recycler.
Antifreeze	• Use secondary containment while storing; send to recycler.
Other vehicle fluids and solvents	• Dispose of as hazardous waste. • *For assistance contact Ada County Landfill at 577-4736.*
Automobile batteries	• Send to auto battery recycler.
Mercury Containing equipment (switches, etc.)	• Dispose of as hazardous waste. • *For assistance contact Ada County Landfill at 577-4736.*
Vehicle washing	• Recycle wash water. • *Contact Boise City, 384-3991 or 384-3993* before discharging to oil/water separator connected to sanitary sewer.
Mobile vehicle washing	• Collect wash water. • *Contact Boise City, 384-3991 or 384-3993* before discharging to oil/water separator connected to sanitary sewer.
Rinse water (new car fleets)	• If rinse water is free of detergents or other cleaners, and as long as the wheels, undercarriage, and engine are not rinsed, discharge to the storm drain is allowed.
Vehicle leaks (auto repair shops)	• Sweep up leaks using granular, absorbent material (e.g., cat litter). • Mop and dispose of mop water to oil/water separator connected to sanitary sewer.

LANDSCAPE/GARDEN MAINTENANCE

DISCHARGE/ACTIVITY	DISPOSAL TECHNIQUES
Pesticides	• Use up, rinse containers, use rinse water as product. • Dispose rinsed containers in trash. • Dispose unused pesticide as hazardous waste.
Garden clippings	• Compost or take to landfill.
Tree trimmings	• Chip, if necessary, before composting, or sending to the landfill.
Swimming pool, spa or fountain water	• Avoid using metal-based algicides (copper sulfate). • For private swimming pools, determine when the chlorine residual is 0, wait 24 hours, then use for irrigation water. Or contact ACHD at 387-6100. You may be able to discharge to storm drain with prior approval. • For public swimming pools, *contact Boise City, 384-3991 or 384-3993* before discharging to sanitary sewer.
Acid or other pool, spa, etc., cleaning	• Neutralize; *contact Boise City, 384-3991 or 384-3993* before discharging to sanitary sewer.
Swimming pool, spa filter backwash	• Reuse for irrigation water. • Dispose on dirt area. • Settle; *contact Boise City, 384-3991 or 384-3993* before discharging to sanitary sewer.

DISPOSAL ALTERNATIVES TABLE

OTHER WASTES

DISCHARGE/ACTIVITY	DISPOSAL TECHNIQUES
Carpet cleaning discharge	• Dispose into the sanitary sewer. • *Contact Boise City at 384-3991 for more information.*
Contaminated pumped ground water, infiltration, and foundation drainage	• Treatment may be necessary. A discharge permit is required prior to any disposal to sanitary sewer. *Call Boise City, 384-3991 or 384-3993 for more information.* • For discharge to a storm drain contact the EPA for an NPDES permit and *contact ACHD at 387-6280* for information regarding dewatering permit requirements.
Kitchen grease	• Put in closed container and put in the trash. NEVER flush down the drain. • Small amounts of cooking oil: fill disposal container with kitty litter and pour oil in. Add sufficient kitty litter to absorb all of the oil, reducing mess and spillage. Dispose to trash as solid waste. • For pick up of large quantities of fat/oil/grease *call Darling Restaurant Services at 344-8318.*
Exhaust hood filter cleaning	• Discharge wash water through a grease interceptor then to sanitary sewer.
Clean-up wastewater from sewer back-up	• Block storm drain, contain, collect and returned spilled material to the sanitary sewer and rinse remaining material to collection point and pump to sanitary sewer (no rinse water may flow to storm drain).

STORMWATER NOTES

AGENCY CONTACTS

Emergency Spill Response

Boise Fire Department **911**

To Report a Stormwater Problem

Stormwater Pollution Hotline ..... **(208) 395-8888**

Need More Information?

Ada County Highway District ..... **(208) 387-6280**
De-watering and storm drain protection requirements.

Ada County Landfill ..... **(208) 577-4725**
General information.

Central District Health ..... **(208) 375-5211**
Septic systems and food service inspections.

Boise City Public Works Department ..... **(208) 384-3901**
Household hazardous materials collection, volunteer storm drain stenciling, solid waste and recycling, sanitary sewer pretreatment, stormwater ordinance, and Stormwater Operation and Maintenance Resource Guide.

Downtown Boise Association/ Capitol City Development Corporation ..... **(208) 472-5200**

Garden City Public Works ..... **(208) 472-2900**
Volunteer storm drain stenciling, solid waste and recycling, sanitary sewer pretreatment, and the stormwater ordinance.

Idaho Department of Environmental Quality ..... **(208) 373-0550**
Industrial hazardous waste, sludge, and wastewater land application permits.

US Environmental Protection Agency **1-800-424-4EPA**
Stormwater Industrial Multi-Sector and Construction General Permits.

Appendix H

NPDES Municipal Stormwater Reapplication

Table of Contents:

July 28, 2017

United States Environmental Protection Agency
Attn: Stormwater MS4 Compliance Program
NPDES Compliance Unit
1200 6th Avenue, Suite 900 (OCE-133)
Seattle, WA 98101

To Whom It May Concern:

Enclosed are a hard and an electronic copy of the Boise/Garden City Area NPDES Municipal Stormwater Permit Reapplication (Reapplication) (permit no. IDS-027561). Please consider this submittal as an addendum to our Boise/Garden City Area NPDES Municipal Stormwater Annual Report, Permit Year 2016 submitted in January 2017. Hard and electronic copies of the Reapplication have also been sent to the Boise Regional Office, Idaho Department of Environmental Quality.

Sincerely,

Erica Anderson Maguire
Stormwater Quality Supervisor

cc: Water Program Manager, Idaho Department of Environmental Quality
Central and Project Files

National Pollutant Discharge Elimination System (NPDES)
Phase I Municipal Stormwater Permit Reapplication

Ada County Highway District
Boise State University
City of Boise
City of Garden City
Ada County Drainage District 3
Idaho Transportation Department, District 3

Permit # IDS-027561

The following information (per 40 CFR 122.21(f)) is provided as the permit reapplication for NPDES Phase I Permit # IDS-027561.

1. Name and mailing address of the Permittees that operate the MS4

Ada County Highway District
Bruce S. Wong, Director
3775 Adams Street
Garden City, ID 83714

City of Boise
David H. Bieter, Mayor
150 N. Capitol Blvd., PO Box 500
Boise, ID 83701-0500

Ada County Drainage District #3
Pat Tate, Chairman c/o Elam and Burke
PO Box 1539
Boise, ID 83701

Boise State University
Mark Heil, Vice President, CFO
1910 University Drive
Boise, ID 83725

City of Garden City
John Evans, Mayor
6015 Glenwood Street
Garden City, ID 83714

Idaho Transportation Department, District 3
Amy Revis, District Administrator
8150 Chinden Blvd.
Boise, ID 83714

2. Names and titles of the primary administrative and technical contacts for the municipal Permittees

Erica Anderson Maguire
Stormwater Quality Supervisor
Stormwater Section
Ada County Highway District
3775 Adams Street
Garden City, ID 83714
208-387-6254
emaguire@achdidaho.org

Steve Hubble
Stormwater Program Coordinator
Department of Public Works
City of Boise
150 N. Capitol Blvd., PO Box 500
Boise, ID 83701-0500
208-608-7521
shubble@cityofboise.org

Ryan Armbruster
Attorney, Elam & Burke
Ada County Drainage District #3
PO Box 1539
Boise, ID 83701
208-343-5454
rpa@elamburke.com

Suzy Arnette
Director, EHSS
Boise State University
1910 University Drive
Boise, ID 83725
208-426-3906
suzyarnette@boisestate.edu

Steve Sweet
Ada County Drainage District #3
Engineer, Quadrant Consulting
1904 W Overland Rd
Boise, ID 83705
208-342-0091
steve@quadrant.cc

Dean Callen
Ada County Drainage District # 3
Supervisor/Ditch Rider
9340 Lorinda Street
Boise, ID 83704
208-602-1713
dean.dd3@gmail.com

Kevin Wallis
Environmental Manager
Garden City
6015 Glenwood Street
Garden City, ID 83714
208-472-2908
kwallis@gardencityidaho.org

Greg Vitley
Senior Environmental Planner
Idaho Transportation Department, District 3
8150 Chinden Blvd.
Boise, ID 83714
208-334-8952
Greg.Vitley@itd.idaho.gov

3. Any previously unidentified water bodies that receive discharges from the MS4

The following table lists the water bodies receiving MS4 discharges for each Permittee.

Permittee	Receiving Waters	Total # of Receiving Waters
Ada County Highway District	See Appendix 1	75
Ada County Drainage District #3	Boise River	1
Boise State University	Boise River	1
City of Boise	Boise River; Julia Davis Pond; Five Mile Creek	3
City of Garden City	Boise River	1
Idaho Transportation Department, District 3	Boise River; Settler's Canal; Lowell Drain; Crane Creek; Ridenbaugh Canal;	14

	Julia Davis Pond; Threemile Lateral; New York Canal; Fivemile Creek; Elmore Drain; Warm Springs Canal; Thruman Mill Canal; Eureka Canal; North Slough;	

4. Summary of any known water quality impacts on the newly identified receiving waters

A Boise River TMDL for sediment and bacteria was approved by IDEQ in 2000 and 2008. The Boise River phosphorous TMDL addendum was approved by EPA Region 10 in December 2015. A sediment and bacteria TMDL addendum was approved by EPA Region 10 in September 2015 for tributaries of the Boise River including Fivemile Creek, Tenmile Creek, Ninemile Creek, and Indian Creek. Municipal stormwater has wasteload allocations in each of 2015 TMDL addendums.

According to the EPA approved 2014 Idaho Integrated Report (IDEQ, 2017) the following impairments (Category 5: Impaired Waters Needing a TMDL) are reported:

- Boise River (Veterans Memorial Parkway to Star Bridge – Temperature
- Boise River (Star to Middleton) – Temperature
- Boise River (Middleton to Indian Creek) – Temperature
- Boise River (Indian Creek to Mouth) – Temperature
- Indian Creek (New York Canal to Sugar Ave.) – Temperature, Nutrients (aka Cause Unknown)
- Indian Creek (Sugar Ave. to Boise River) – Temperature, Nutrients (aka Cause Unknown)
- Fivemile Creek (3rd order) - Nutrients, Chlorpyrifos
- Tenmile Creek (3rd order below Blacks Creek Reservoir – Nutrients, Chlorpyrifos

5. Description of any changes to the number of applicants

This permit reapplication is submitted on behalf of: Ada County Highway District (ACHD), Ada County Drainage District 3 (DD3), Boise City, Garden City, Boise State University (Boise State) and Idaho Transportation District (ITD) District 3, collectively the Permittees. ITD District 3 has had discussions with EPA Region 10 regarding the option to have one general permit cover all ITD districts statewide. Until such permit is authorized, ITD District 3 will continue to participate as a Permittee in the Phase I Permit reapplication process.

Within the permit area, Permittee jurisdiction varies. A description of each jurisdiction follows:

- ACHD owns and operates all public roadways and associated stormwater conveyances in the Phase I permit area except roadways and stormwater facilities operated by ITD District 3.
- ITD District 3 owns and operates the following public roadways in the Phase I permit area: I-84; I-184; Highways 20, 21, 26, 30, and 44; Glenwood Street; Chinden Boulevard; and the Chinden-Broadway Connector.
- Boise City has jurisdiction over city-owned facilities and 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.
- Ada County DD3 owns and operates drainage channels and drain pipes in what is generally referred to as southeast Boise. Virtually all of the geographic area which encompasses DD3's boundaries are now within the city limits of the city of Boise. Southeast Boise entails an older fully developed area with limited future infill development. DD3's area also includes the Boise State campus and other Boise State owned properties. DD3 receives drainage from storm drains under the control of ACHD and Boise State, irrigation from irrigated land, and irrigation canals and drainage from residential and commercial development (previously irrigated lands), which discharge directly into DD3's facilities. Several DD3 drains discharge into other facilities controlled by ACHD, Boise City, irrigation canals, and the Boise River.
- Boise State is responsible for the state-owned university land adjacent to the Boise River south of Julia Davis Park.

6. Any changes or modifications to the Storm Water Management Program

Permittees met in May, June, and July 2017 to discuss the reapplication approach and specific 2013 permit requirements the Permittees would like to have modified or eliminated. In general, Permittees conveyed that implementing the current permit was going well and most permit requirements were believed to be useful and applicable to the intent of reducing pollutants to the maximum extent practicable. Permittees felt strongly that including more flexibility to some aspects of the permit would provide for greater pollutant removal and economic benefit to the Permittees and the public. As a group, the Permittees are requesting modifications that address the specific permit areas of this reapplication. Modifications and general comments associated with administration, general requirements and reporting are listed in 6.I.Table 1. Comments regarding monitoring are located in 6.II.

I. Administration, General Requirements, and Reporting

Table 1. Recommendations for Revisions to Boise/Garden City Phase I MS4 Permit Requirements (IDS-027561).

PERMIT SECTION	CURRENT SECTION/LANGUAGE	RECOMMENDATION/ALTERNATE LANGUAGE
I.C.3	Intergovernmental Agreement	*Permittees propose to continue current roles and responsibilities as they relate to permit administration, monitoring and public education and outreach:* • *Permit Administration Lead – Ada County Highway District* • *Monitoring Lead – Ada County Highway District* • *Public Education and Outreach Lead – City of Boise*
II.A.1.b.	SWMP Documentation	*Permittees request streamlining with annual reporting and annual SMWP updates. Proposed permit text edits are underlined below.* (i) Each Permittee must provide an opportunity for public review and comment on their SWMP documentation <u>submitted with the 1st Year Annual Report,</u> consistent with applicable state or local requirements and Part II. B.6 of this Permit. <u>Thereafter, if there is no change to the SWMP, the Permittee may refer to the SWMP then in effect and need not include the SWMP with the Annual Report.</u> <u>(ii)</u> Each Permittee's SWMP documentation must be ~~updated~~ <u>reviewed</u> at least annually ~~and submitted as part of each~~

		~~subsequent Annual Report~~. <u>If the Permittee determines a change or modification to the SWMP is warranted, the revised or modified SWMP must be included as part of that year's Annual Report. If the Permittee has not modified the SWMP, the Permittee shall so state in the Annual Report.</u>
II.A.4	Subwatershed Planning …the Permittees must jointly complete at least two individual sub-watershed plans for areas served by the MS4s within the Permit area….	*The Permittees request no specific plan requirements in the new permit, but will continue to build on the successes of subwatershed planning activities through stormwater management implementation and monitoring as needed. In lieu of large-scale planning activities the Permittees propose to explore the development or use of an easy to use assessment tool that can be consistently applied to evaluate opportunities that arise in repair and redevelopment/development projects. These efforts will help the Permittees identify and prioritize areas of further improvement and evaluate solutions that will have the greatest positive impact to water quality.*
II.B.2	Storm Water Management for Areas of New Development and Redevelopment. At a minimum, the Permittees must implement and enforce a program to control storm water runoff from new development and redevelopment projects that result in land disturbance of 5,000 square feet or more, excluding individual one or two family dwelling development or redevelopment. This	*The Permittees are requesting an exemption from post construction stormwater management requirements for small pedestrian infrastructure (sidewalk, walking path) projects completed separately from road or other transportation improvement projects. The implementation of post construction BMPs is challenging on these small*

	program must apply to private and public sector development, including roads and streets. The program implemented by the Permittees must ensure that permanent controls or practices are utilized at each new development and redevelopment site to protect water quality.	*projects and often requires the acquisition of adjacent property.* *We request addition of the <u>underlined</u> language below to the existing permit language:* At a minimum, the Permittees must implement and enforce a program to control storm water runoff from new development and redevelopment projects that result in land disturbance of 5,000 square feet or more, excluding individual one or two family dwelling development or redevelopment <u>and infill or redevelopment of public pedestrian infrastructure projects.</u> This program must apply to private and public sector development, including roads and streets. The program implemented by the Permittees must ensure that permanent controls or practices are utilized at each new development and redevelopment site to protect water quality.
II.B.2.a	Ordinance or other regulatory mechanisms. No later than the expiration date of this Permit, each Permittee must update its applicable ordinance or regulatory mechanism which requires the installation and long-term maintenance of permanent storm water management controls at new development and redevelopment projects. Each Permittee must update their ordinance/regulatory mechanism to the extent allowed by local and state law, consistent with the individual Permittee's respective legal authority. Permittees must submit their revised ordinance/regulatory mechanism as part of the 5th Year Annual Report.	*The Permittees are requesting additional flexibility for the implementation of Stormwater Management requirements for new development and redevelopment. There are concerns about the feasibility of onsite retention in certain portions of the Permit Area. There is also a desire to explore the use of best management practices that target the removal of dissolved Phosphorus prior to discharge to surface or groundwater.* *We request addition of this language after (ii):*

	(i)	The ordinance/regulatory mechanism must include site design standards for all new and redevelopment that require, in combination or alone, storm water management measures that keep and manage onsite the runoff generated from the first 0.6 inches of rainfall from a 24-hour event preceded by 48 hours of no measureable precipitation. Runoff volume reduction can be achieved by canopy interception, soil amendments, bioretention, evapotranspiration, rainfall harvesting, engineered infiltration, extended filtration, and/or any combination of such practices that will capture the first 0.6 inches of rainfall. An Underground Injection Control permit may be required when certain conditions are met. The ordinance or regulatory mechanism must require that the first 0.6 inches of rainfall be 100% managed with no discharge to surface waters, except when the Permittee chooses to implement the conditions of II.B.2.a.ii below.	Permittees may also consider the adoption of area or sub-watershed specific stormwater management requirements. These requirements provide alternative compliance for onsite retention requirements in areas where widespread implementation of onsite retention is not practicable. These alternate compliance requirements could include targeted removal or treatment of pollutant(s) of concern, regional stormwater management or other innovative approaches. The adoption of alternative compliance requirements shall be developed through a public process with detailed technical information that supports the need for the alternative approach. .
	(ii)	For projects that cannot meet 100% infiltration/evapotranspiration/reuse requirements onsite, the Permittees' program may allow offsite mitigation within the same subwatershed, subject to siting restrictions established by the Permittee. The Permittee allowing this option must develop and apply criteria for determining	

	the circumstances under which offsite mitigation may be allowed. A determination that the onsite retention requirement cannot be met must be based on multiple factors, including but not limited to technical feasibility or logistic practicality (e.g. lack of available space, high groundwater, groundwater contamination, poorly infiltrating soils, shallow bedrock, and/or a land use that is inconsistent with capture and reuse or infiltration of storm water). Determinations may not be based solely on the difficulty and/or cost of implementing such measures. The Permittee(s) allowing this option must create an inventory of appropriate mitigation projects and develop appropriate institutional standards and management systems to value, estimate and track these situations. Using completed subwatershed plans or other mechanisms, the Permittee(s) must identify priority areas within subwatersheds in which off-site mitigation may be conducted.	
II.B.2.c.(i) and (ii)	Green Infrastructure/Low Impact Development (LID) Incentive Strategy and Pilot Projects. No later than September 30, 2015, the Permittees must develop a strategy to provide incentives for the increased use of LID techniques in private and public sector development projects within each Permittee's jurisdiction. Permittees must comply with applicable State and local public notice requirements when developing this	*The permittees request revised language as noted below:* <u>c) Green Infrastructure Strategy Implementation</u> <u>Permittees shall continue the implementation of their Green Infrastructure Strategies, report annually on progress and complete one update to the</u>

	Strategy. Pursuant to Part IV.A.2.a, the Strategy must reference methods of evaluating at least three (3) Green Infrastructure/LID pilot projects as described below. Permittees must implement the Green Infrastructure/LID Incentive Strategy, and complete an effectiveness evaluation of at least three pilot projects, prior to the expiration date of this Permit. (i) As part of the 3rd Year Annual Report, the Permittees must submit the written Green Infrastructure /LID Incentive Strategy; the Strategy must include a description of at least three selected pilot projects, and a narrative report on the progress to evaluate the effectiveness of each selected LID technique or practice included in the pilot project. Each pilot project must include an evaluation of the effectiveness of LID technique(s) or practice(s) used for on-site control of water quality and/or quantity. Each Pilot Project must involve at least one or more of the following characteristics: - The project manages runoff from at least 3,000 square feet of impervious surface; - The project involves transportation related location(s) (including parking lots); - The drainage area of the project is greater than five acres in size; and/or - The project involves mitigation of existing storm water discharges to one or more of the water bodies listed in Table II.C. (ii) Consistent with Part IV.A.10, the Permittees must evaluate the performance of LID technique(s) or practice(s) in each pilot project, and include a progress report on overall strategy implementation in the 4th Annual Report. Final pilot project	<u>existing strategy no later than (insert permit expiration date). During the update to the Strategy, the permittees shall consider options to incorporate additional innovative approaches to green infrastructure implementation.</u>

	evaluations must be submitted in the 5th Year Annual Report. The Permittees must monitor, calculate or model changes in runoff quantities for each of the pilot project sites in the following manner: • For retrofit projects, changes in runoff quantities shall be calculated as a percentage of 100% pervious surface before and after implementation of the LID technique(s) or practice(s). • For new construction projects, changes in runoff quantities shall be calculated for development scenarios both with LID technique(s) or practice(s) and without LID technique(s) or practice(s). • The Permittees must measure runoff flow rate and subsequently prepare runoff hydrographs to characterize peak runoff rates and volumes, discharge rates and volumes, and duration of discharge volumes. The evaluation must include quantification and description of each type of land cover contributing to surface runoff for each pilot project, including area, slope, vegetation type and condition for pervious surfaces, and the nature of impervious surfaces. • The Permittees must use these runoff values to evaluate the overall effectiveness of various LID technique(s) or practice(s) and to develop recommendations for future adoption of LID technique(s) or practice(s) that address appropriate use, design, type, size, soil type and operation and maintenance practices.	
II.B.2.c.(iii)	Riparian Zone Management and Outfall Disconnection. No later than September 30, 2015, the Permittees must identify and prioritize riparian areas appropriate for Permittee acquisition and protection. Prior to the expiration date of this Permit, the Permittees must undertake and complete at least one project designed to reduce	*The permittees recommend deletion of this section. Future outfall disconnection or riparian projects could be considered under the revised section (c) above.*

	the flow of untreated urban storm water discharging through the MS4 system through the use of vegetated swales, storm water treatment wetlands and/or other appropriate techniques. The Permittees must submit the list of prioritized riparian protection areas, and a status report on the planning and implementation of the outfall disconnection project, as part of the 3rd Year Annual Report. Documentation of the completed outfall disconnection project must be included in the 5th Year Annual Report.	
II.B.2.c.(iv)	Repair of Public Streets, Roads and Parking Lots. When public streets, roads or parking lots are repaired (as defined in Part VII), the Permittees performing these repairs must evaluate the feasibility of incorporating runoff reduction techniques into the repair by using canopy interception, bioretention, soil amendments, evaporation, rainfall harvesting, engineered infiltration, rain gardens, infiltration trenches, extended filtration and/or evapotranspiration and/or any combination of the aforementioned practices. Where such practices are found to be technically feasible, the Permittee performing the repair must use such practices in the design and repair. These requirements apply only to projects whose design process is started after the effective date of this Permit. As part of the 5th Year Annual Report, the Permittees must list the locations of street, road and parking lot repair work completed since the effective date of the Permit that have incorporated such runoff reduction practices, and the receiving water body(s) benefitting from such practices. This documentation must	*For simplification, the Permittees recommend revision of this section.* ~~When public streets, roads or parking lots are repaired (as defined in Part VII), the Permittees performing these repairs must evaluate the feasibility of incorporating runoff reduction techniques into the repair by using canopy interception, bioretention, soil amendments, evaporation, rainfall harvesting, engineered infiltration, rain gardens, infiltration trenches, extended filtration and/or evapotranspiration and/or any combination of the aforementioned practices. Where such practices are found to be technically feasible, the Permittee performing the repair must use such practices in the design and repair. These requirements apply only to projects whose design process is started after the effective date of this Permit. As part of the 5th Year Annual~~

	include a general description of the project design, estimated total cost, and estimates of total flow	~~Report, the Permittees must list the locations of street, road and parking lot repair work completed since the effective date of the Permit that have incorporated such runoff reduction practices, and the receiving water body(s) benefitting from such practices. This documentation must include a general description of the project design, estimated total cost, and estimates of total flow~~ When public streets, roads or parking lots without existing stormwater infiltration facilities are repaired (as defined in Part VII), Permittees performing these repairs must evaluate the feasibility of incorporating runoff reduction techniques into the repair. In areas where existing stormwater infiltration facilities have been constructed to manage runoff from public streets, roads or parking lots, no additional action is required.
II.B.2.f	Inspection and Enforcement of Permanent Storm Water Management Controls. The Permittees must ensure proper long term operation and maintenance of all permanent storm water management practices within the Permittees' respective jurisdiction. The Permittees must implement an inspection program, and define and prioritize new development and redevelopment sites for inspections of permanent storm water management controls. Factors used to prioritize sites must include, but not be limited to: size of new development or redevelopment area; sensitivity and/or impaired status of receiving water(s); and, history of non-compliance at the site during the construction phase.	*The permittees request additional flexibility to prioritize inspections of permanent stormwater management facilities.* Factors used to prioritize sites ~~must~~ may include, but not be limited to: size of new development or redevelopment area; sensitivity and/or impaired status of receiving water(s); ~~and,~~ history of non-compliance ~~at the site during the construction phase~~; the presence of offsite stormwater discharge; use of the property where the stormwater facilities are located; type of stormwater facility; drainage or treatment area of the stormwater facility or other factors determined to be appropriate to

	(i) No later than September 30, 2017, all high priority locations must be inventoried and associated inspections must be scheduled to occur at least once annually. The inspections must determine whether storm water management or treatment practices have been properly installed (i.e., an "as built" verification). The inspections must evaluate the operation and maintenance of such practices, identify deficiencies and potential solutions, and assess potential impacts to receiving waters. (ii) No later than September 30, 2017, the Permittees must develop checklists to be used by inspectors during these inspections, and must maintain records of all inspections conducted on new development and redevelopment sites. (iii) No later than September 30, 2017, the Permittees must develop and implement an enforcement strategy similar to that required in Section II.B.1.e to maintain the integrity of permanent storm water management and treatment practices.	<u>the Permittee</u>.
II.B.1.g **II.B.2.g** **II.B.4.i** **II.B.5.h** **II.B.6.c**	Miscellaneous Training Requirements	*Permittees are requesting additional clarity and flexibility for training requirements. Please consider the language below to be inserted in the appropriate section or sections:* *<u>Permittees may meet requirements for training and education by attending such</u>*

		sessions either in person, through online/webinar programs or information and similar technology from any source related to stormwater management, drainage and best management practices. Permittees with fewer than seven outfalls shall be required to attend such sessions every other year.
IV.C.3	Annual Report	*The permittees request limiting redundancy in annual reporting. Permittees request the addition of the following language:* Each Permittee may refer to previous documents and other information submitted in any previous Annual Report and need not resubmit those documents or materials, including, but not limited to, the Permit, the SWMP, and other information previously submitted.

II. Monitoring Program

The intent of these comments is to meet both existing and new permit requirements while leveraging lessons learned and existing programs to address potential new permit requirements. The Permittees would like to support these approaches by presenting the data collected to date to maximize the use of the data collected. The data will be evaluated comprehensively under this permit as part of the WY 2017 Annual Report. Below are some general items identified during this permit term we would like to have considered when developing the new MS4 permit. We will refine our approach to these general comments by evaluating all the data collected and provide more specific reapplication support in our 2017 annual report that will be submitted in January 2018.

1) IV.A.1-7 Wet Weather Monitoring

The Permittees have been successfully collecting wet weather stormwater characterization samples from multiple sites since the issuance of the initial permit in 2000. As part of this monitoring effort, the Permittees have compiled flow weighted composite and grab sample results for over 17 years with at least three samples per year at each site. In the first permit five sites were sampled. In the current permit (second cycle), four of the original monitoring sites were discontinued and four new monitoring locations were added to further expand the dataset (5 sites total per permit). The Permittees have now characterized stormwater runoff from more than 2,000 acres of urban watershed and believes this to be a robust and comprehensive dataset that characterizes stormwater runoff from the Phase I MS4.

Recognizing outfall characterization is an important part of MS4 stormwater management, The Permittees propose to continue wet weather outfall monitoring, but at fewer sites. The Permittees request flexibility in the permit to monitor additional sites (not just established outfall monitoring sites) within the characterized subwatersheds for specific purposes as opportunities/needs warrant. The addition of selective monitoring sites is being proposed without comprehensively increasing the current monitoring requirements. Permittees will evaluate the data collected to date and identify data gaps to which additional ongoing monitoring can be focused and present recommended approaches to wet weather monitoring in the 2017 Annual Report. This information will be included in a specific reapplication section in the annual report.

2) IV.A.8 In-Stream and Fish Tissue Monitoring

Under the existing permit, EPA provided an option for the Permittees to augment the stormwater discharge data by conducting in-stream water quality and/or fish tissue sampling activities. The stated purpose of fish tissue sampling is “to determine if fish tissue concentrations of methylmercury in the Lower Boise River are compliant with Idaho’s methylmercury fish tissue criterion…”. (IV.8.c.) The Permittees opted to not engage in this type of

monitoring as part of the existing permit. The Permittees propose to eliminate this permit requirement and continue to focus monitoring resources at the subwatershed MS4 level where pollution reduction efforts can have the greatest impact.

3) *IV.A.9 Structural Controls and GSI Effectiveness Evaluation*

The Permittees have been monitoring structural control effectiveness for the duration of the Phase I permit (first and second cycle). To date, Permittees have collected effectiveness data for the following types of structural BMPs: sand and grease traps, hydrodynamic separators, biofiltration systems, seepage beds, and vegetated swales. Permeable pavement and tree cell GSI solutions have also been observationally evaluated. These structural control effectiveness evaluations have provided information on the existing design standards and use of these systems within the MS4. Modeling is also being used to supplement the monitoring needed to evaluate BMPs based on current and historical design criteria. In order to integrate this monitoring with the wet weather monitoring discussed previously, the Permittees would like the flexibility to focus BMP monitoring on those types of BMPs found in the subwatersheds that most accurately represent the entire MS4. This type of BMP monitoring could include structural controls, GSI, or non-structural BMPs such as street sweeping or catch basin cleaning.

4) *IV.A.11 Dry Weather Outfall Screening*

Outfall inventory and screening data collected to date represent an effort to identify illicit discharges in the MS4 and control pollution through source control. Under the current permit, Permittees are also attempting to quantify loads from outfalls that may flow during dry weather including those associated with groundwater and/or irrigation discharges. As part of this reapplication, the Permittees would like EPA to consider language that allows the Permittees the capacity to selectively determine constituents included in the outfall screening program. This request is in contrast to completing analyses of all constituents listed in the current permit at every outfall. The Permittees will evaluate the lessons learned and data collected to date and present some recommended approaches to analyte selection in the 2017 Annual Report that also meet the intent of eliminating illicit discharges and quantifying the dry weather flows discharged from the MS4. This information will be included in a section specific to reapplication in the 2017 Annual Report.

For any Permittee with less than seven outfalls, the Permittees request dry weather outfall screening addressed per language below:

<u>For any Permittee with less than seven outfalls, the Permittee shall be required to screen one outfall per Permit Year for dry weather analytical and field screening monitoring within the June 1 to September 30 time frame. Upon the effective date of the Permit, any Permittee with less than seven outfalls shall be required to conduct visual dry weather screening of one outfall or at least 20% of all outfalls per year.</u>

Appendix 1. Ada County Highway District Phase I Receiving Waters

2017 Phase I Receiving Waters	
#	**Receiving Water**
1	Ash Lateral
2	Bennett Lateral
3	Boise City Canal
4	Boise River
5	Boise River-Trib to
6	Boise Valley Canal
7	Bubb Canal
8	Chaffin Drain
9	Cloverdale Lateral
10	Collis Lateral
11	Cottonwood Creek
12	Cottonwood Creek-Trib of
13	Crane Creek
14	Davis Drain
15	Drain A
16	Drain B
17	Drain D
18	Drain E
19	Dry Creek
20	Dry Creek Canal
21	Eagle Drain
22	Eagle Drain-lateral of
23	Eggers Lateral
24	Elmore Drain
25	Farmer's Lateral
26	Farmer's Union Canal
27	Fitz Lateral
28	Fivemile Creek
29	Fivemile Creek-Trib. to
30	Freestone Creek
31	Gruber Lateral
32	Helm Lateral
33	Hulls Gulch
34	Hulls Gulch-Lateral of
35	Huntington Lateral
36	Julia Davis Pond
37	Karnes Lateral
38	Lake Elmore
39	Lake Heron
40	Lake Heron Creek-south fork
41	Lake Heron-lateral of
42	Logger Creek

2017 Phase I Receiving Waters cont.	
#	**Receiving Water**
43	Logger Creek-Lateral
44	Lowell Drain
45	McMillan Lateral
46	Milk Lateral
47	New York Canal
48	North Slough
49	Penitentiary Canal
50	Penninger Lateral
51	Penninger Secondary
52	Pierce Creek
53	Pierce Gulch
54	Powell Lateral
55	Ridenbaugh Canal
56	Ridenbaugh Ditch
57	Rust Lateral
58	Settler's Canal
59	Settler's Canal Lateral
60	Shavrer Lateral
61	South Slough
62	Stewart Gulch
63	Synder Lateral
64	Threemile Creek
65	Threemile Lateral
66	Thurman Mill Canal
67	Thurman Mill Canal-Lateral
68	Tuttle Lateral
69	Unnamed Ditch
70	Warm Spring Canal
71	Warm Springs Canal
72	Watson Drain
73	Watson Drain-Lateral
74	Wilson Fruit Lateral
75	Zinger Lateral

Total Receiving Waters = 75