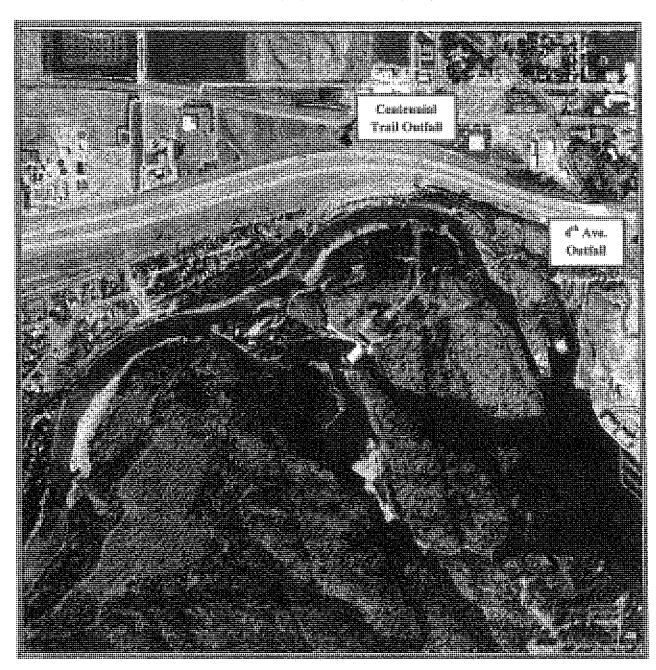


STORM WATER MANAGEMENT PROGRAM 2012 ANNUAL REPORT



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City of Post Falls

2012 Annual Report on the Storm Water Program

MS4 Permit IDS-028231

INTRODUCTION

Pursuant to the referenced permit, Section IV. C. Reporting Requirements (see Appendix - A), this report summarizes the City's storm water program activities from January 1, 2012 to December 31, 2012. The requirements of Section IV.C. are:

- 1. Storm Water Discharge Monitoring Report must include:
 - a. Dates of sample collection and analyses;
 - b. Results of analytical samples collected;
 - c. Location of sample collection;
 - d. Estimates of the daily and/or monthly average pollutant loads for each pollutant at each sample location; and
 - e. A cumulative annual estimate of pollutant loading for each parameter at each sample location, and an overall estimate of the contribution of pollutants from all storm water emanating from the Post Falls MS4.
- 2. Annual Report must include:
 - a. Assess compliance with this permit and progress towards achieving the identified actions and activities for each minimum control measure in Parts II.B. and II.C. Status of each program area must be addressed, even if activity has previously been completed or has yet been implemented;
 - b. Results of any information collected and analyzed during the previous 12 months period, including stormwater discharge analytical results of samples collected, estimates of cumulative daily and monthly average pollutant loads for each pollutant at each sample location, water quality monitoring as noted in this part and any other information used to assess the success of the program at improving water quality to the maximum extent practicable;
 - c. A summary of the number and nature of inspections, formal enforcement actions, and/or other similar activities performed;
 - d. A summary list of any water quality compliance-related enforcement actions received from regulatory agencies other than EPA. Such action include, but are not limited to, formal or informal warning letters, notices of violation, field citations, or similar actions. This summary should include date, project synopsis, and action taken to address the compliance issue(s);
 - e. Copies of education materials, ordinances (or other regulatory mechanisms), inventories, guidance materials, or other products produced as a result of actions or activities required by this permit;
 - f. A general summary of the activities the permittee plans to undertake during the next reporting cycle (including an implementation schedule) for each minimum control measure:
 - g. A description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable water quality standards;

h. Notice if the permittee is relying on another entity to satisfy any of the permit obligations, if applicable.

The following table summarizes the status of each of the IV.C. reporting requirements listed above and the location of documented data, analysis and discussion that are included in this report.

Item #	Section IV.C. Element	Current Status	Document Location
1	1.a.	Monitoring for this and the prior permit cycles is complete	Appendix - B
2	1.b.	Monitoring for this and the prior permit cycles is complete	Appendix - B
3	1.c.	Monitoring for this and the prior permit cycles is complete	Appendix - B
4	1.d.	Monitoring for this and the prior permit cycles is complete	Appendix - B
5	1.e.	Monitoring for this and the prior permit cycles is complete	Appendix - B
6	2.a.	The assessment of program control measures is included in this report	Appendix - C
7	2.b.	Results of the last 12 months' monitoring are included in this report	Appendix - D
8	2.c.	A summary of inspections and enforcement actions is included in this report	Appendix - E
9	2.d.	A summary of enforcement actions received is included in this report	Appendix - F
10	2.e.	Copies of permit-related products and materials produced during 2012 are included in this report	Appendix - G
11	2.f.	An implementation schedule and a summary of planned activities during the next reporting cycle is included in this report	Appendix - H
12	2.g.	A schedule of implementation and description of additional BMPs that may be needed to comply with water quality standards are included in this report	Appendix - I
13	2.h.	The City of Post Falls did not rely on another entity for any of its permit obligations during this permit cycle.	None Required

APPENDIX – A REPORTING REQUIREMENTS LIST

C. Reporting Requirements

- Storm Water Discharge Monitoring Report. Within two years from the
 effective date of this permit, and annually thereafter, all available storm water
 discharge monitoring data must be submitted as part of the Annual Report.
 At a minimum, this Storm Water Discharge Monitoring Report must include:
 - a) Dates of sample collection and analyses;
 - b) Results of analytical samples collected;
 - c) Location of sample collection;
 - d) Estimates of the daily and/or monthly average pollutant loads for each pollutant at each sample location; and
 - e) A cumulative annual estimate of pollutant loading for each parameter at each sample location, and an overall annual estimate of the contribution of pollutants from all storm water emanating from the Post Falls MS4.
- 2. Annual Report. No later than February 15 of each year beginning in year 2010, the permittee shall submit an Annual Report to EPA and IDEQ. The reporting period for the first annual report will be from the effective date of this permit through December 31, 2009. The reporting period for all subsequent annual reports shall be the previous calendar year. Copies of all Annual Reports must be made available to the public, at a minimum, through a permittee-maintained website. The following information must be contained in each Annual Report:
 - a) The report must assess compliance with this permit and progress towards achieving the identified actions and activities for each minimum control measure in Parts II.B and II.C. Status of each program area must be addressed, even if activity has previously been completed or has not yet been implemented;
 - b) Results of any information collected and analyzed during the previous 12 month period, including stormwater discharge analytical results of samples collected, estimates of cumulative daily and monthly average pollutant loads for each pollutant at each sample location, water quality monitoring as noted in this part and any other information used to assess the success of the program at improving water quality to the maximum extent practicable;
 - c) A summary of the number and nature of inspections, formal enforcement actions, and/or other similar activities performed;
 - d) A summary list of any water quality compliance-related enforcement actions received from regulatory agencies other than EPA. Such actions include, but are not limited to, formal or informal warning letters, notices of violation, field citations, or similar actions. This summary should include dates, project synopsis, and actions taken to address the compliance issue(s);

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- e) Copies of education materials, ordinances (or other regulatory mechanisms), inventories, guidance materials, or other products produced as a result of actions or activities required by this permit;
- f) A general summary of the activities the permittee plans to undertake during the next reporting cycle (including an implementation schedule) for each minimum control measure;
- g) A description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable water quality standards;
- h) Notice if the permittee is relying on another entity to satisfy any of the permit obligations, if applicable.

D. Addresses. Reports and other documents required by this permit must be signed in accordance with Part VI.E and submitted to each of the following addresses:

EPA:

United States Environmental Protection Agency

Attention: Storm Water Program

NPDES Compliance Unit

1200 6th Avenue, Suite 900 (OCE-133)

Seattle, WA 98101

IDEQ:

Idaho Department of Environmental Quality

Coeur d'Alene Regional Office

2110 Ironwood Parkway Coeur d'Alene, ID 83814

APPENDIX - B

MONITORING RESULTS FOR CURRENT PERMIT CYCLE

2010 Stormwater/Events Data Files/Water Quality Data

	<u>PQL</u>	<u>Method</u>
TSS, mg/L	0.17	SM2340
·TP, mg/L	0.05	EPA365.3
Lead, mg/L	0.002	SM3113
		SM 4500N
TN, mg/L	0.05	B/4110
Zinc, mg/L	0.013	SM3120
Hardness, mg/L	0.2	SM2340
PCBs, ug/L	0.2	EPA 808 2

Concentration						
	4th Avenue Outfall					
Sample Date	8 / 12 / 2009	3/17/2010	5/19/2010	8/11/2010	9/16/2010	
TSS, mg/L	63	192	372.00	32	84	
TP, mg/L	0.179	0.070	0.573	0.578	0.274	
Lead, mg/L	0.006	0.018	0.02	ND	0.011	
TN, mg/L	1.01	2.27	3.02	5.19	2.54	
Zinc, mg/L	0.061	0.21	0.39	0.193	0.191	
Hardness, mg/L	18.2	34.7	97.80	67.8	51.3	
PCBs, ug/L	ND	ND	ND	ND	ND	
Discharge Volume (cubic feet)	49,934	6,146	16,133	3,841	3,841	
Discharge volume (gallons)	373,509	45,970	120,672	28,731	28,731	

2010
Stormwater/Events Data Files/Water Quality Data

	<u>PQL</u>	<u>Method</u>
TSS, mg/L	0.17	SM2340
TP, mg/L	0.05	EPA365.3
Lead, mg/L	0.002	SM3113
		SM 4500N
TN, mg/L	0.05	B/4110
Zinc, mg/L	0.013	SM3120
Hardness, mg/L	0.2	SM2340
PCBs, ug/L	0.2	EPA 808 2

Concentration						
	Centennial Trail Outfall					
Sample Date	8/12/2009	3/17/2010	5/19/2010	8/11/2010	9/16/2010	
TSS, mg/L	80	545	328	960	76	
TP, mg/L	0.202	0.930	0.448	1.11	0.2	
Lead, mg/L	0.01	0.03	0.019	0.079	0.009	
TN, mg/L	1.11	4.3	2.51	7.68	2.83	
Zinc, mg/L	0.176	0.79	0.289	3.05	0.284	
Hardness, mg/L	25.9	85.7	49.6	290	38.9	
PCBs, ug/L	ND	ND	ND	ND	ND	
Discharge Volume (cubic feet)	17,572	2,163	5,677	1,352	1,352	
Discharge volume (gallons)	131,436	16,177	42,464	10,110	10,110	

2010 Stormwater/Events Data Files/Water Quality Data

Event Pollutant Discharge (lbs)					
	4th Avenue	Outfall		4	,
Sample Date	8/12/2009	3/17/2010	5/19/2010	8/11/2010	9/16/2010
TSS	196.37	73.66	374.61	7.67	20.14
TP	0.56	0,03	0.58	0.14	0.07
Lead	0.019	0.007	0.022	ND	0.003
TN	3.15	0.87	3.04	1.24	0.61
Zinc	0.19	0.08	0.39	0.05	0.05
Hardness	56.73	13.31	98.49	16.26	12.30
PCBs	ŊD	ND	ND	ND	ND
Discharge Volume (gallons)	373,509	45,970	120,672	28,731	28,731
Event Precip (inches)	0.65	0.08	0.21	0,05	0.04
Inches per year =	27.44	Per USBR Agri	Met Station RTHI	or water year O	ct 1 - Sep 30

2010 Stormwater/Events Data Files/Water Quality Data

Event Pollutant Discharge (lbs)					
	Centennial Trail O	utfall			
Sample Date	8/12/2009	3/17/2010	5/19/2010	8/11/2010	9/16/2010
TSS	87.75	73.57	116.23	81.00	6.41
TP	0.22	0.13	0.16	0.09	0.02
Lead	0.011	0.004	0.007	0.007	ND
TN	1.22	0.58	0.89	0.65	0.24
Zinc	0.19	0.11	0.10	0.26	0.02
Hardness	28.41	11.57	17.58	24.47	3.28
PCBs	ND	ND	ND	ND	ND
Discharge Volume (gallons)	131,436	16,177	42,464	10,110	10,110
Event Precip (inches)	0.65	0.08	0.21	0.05 THI for water ye	0.05
Inches per year =	27.44	30			а, сота оср

Estimate of Pollutant Load/Inch Precip (lbs/inch)						
	4th Avenue Outfall					
Sample Date	8/12/2009	3/17/2010	5/19/2010	8/11/2010	9/16/2010	
TSS	302.10	920.69	1783.84	153.45	503,50	
TP	0.86	0.34	2.75	2.77	1.64	
Lead ·	0.03	0.09	0.11	ND	0.07	
TN	4.84	10.89	14.48	24.89	15.22	
Zinc	0.29	1.01	1.87	0.93	1.14	
Hardness	87.27	166.40	468.98	325.12	307.50	
PCBs	ND	ND	ND	ND	ND	
Discharge						
Volume						
(gallons)	373,509	45,970	120,672	28,731	28,731	

Estimate of Pollutant Load/Inch Precip (lbs/inch)					
	Centennial Trai	l Outfall			
Sample Date	8/12/2009	3/17/2010	5/19/2010	8/11/2010	9/16/2010
TSS	134.99	919.65	553.48	1619.94	128.25
ТР	0.34	1.57	0.76	1.87	0.34
Lead	0.02	0.05	0.03	0.13	ND
TN	1.87	7.26	4.24	12.96	4.78
Zinc	0.30	1.33	0.49	5,15	0.48
Hardness	43.70	144.61	83.70	489.36	65.64
PCBs	ND	ND	ND	ND	ND
Discharge Volume (gallons)	131,436	16,177	42,464	10,110	10,110

	4th	Centennial	Total
TSS	55.08	50.46	106
ТР	0.13	0.07	0.20
Lead	ND	ND .	ND
TN	1.06	0.47	1.52
Zinc	0.08	0.12	0.20
Hardness	20.38	12. 4 3	32.81
PCBs	ND	ND	ND

	4th	Centennial	Total
TSS	20,106	18,419	38,525
ТР	45.86	26.76	72.62
Lead	ND	ND	ND
TN	385.93	170.67	556.60
Zinc	28.78	42.50	71.28
Hardness	7,438	4,539	11,976
PCBs	ND	ND	ND

2011 Stormwater/Events Data Files/Water Quality Data

	PQL	Method
TSS, mg/L	1	SM2540
TP, mg/L	0.025	EPA365.3
Lead, mg/L	0.01	SM3120
		SM 4500N
TN, mg/L	80,0	B/4110
Zinc, mg/L	0.013	SM3120
Hardness, mg/L	0.2	SM2340
PCBs, ug/L	0.2	EPA 808 2

Concentration					
	4th Avenue	Outfall			
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11
TSS, mg/L	135	14	142	173	60
TP, mg/L	0.159	0.052	1.11	0.29	0.354
Lead, mg/L	0.011	ND	0.011	0.014	ND
TN, mg/L	0.75	0.58	4.88	1.19	3.5
Zinc, mg/L	0.13	0.033	0.23	0.21	0.15
Hardness, mg/L	36.5	20.1	72.40	1.36	41.1
PCBs, ug/L	ND	ND	ND	ND	ND
Discharge Volume (cubic feet)	6,146	26,888	58,385	32,265	53,007
Discharge volume (gallons)	45,970	201,120	436,718	241,344	396,494

2011 Stormwater/Events Data Files/Water Quality Data

	PQL	Method
TSS, mg/L	1	SM2540
TP, mg/L	0.025	EPA365.3
Lead, mg/L	0.01	SM3120
		SM
		4500N
TN, mg/L	0.08	B/4110
Zinc, mg/L	0.013	SM3120
Hardness, mg/L	0.2	SM2340
PCBs, ug/L	0.2	EPA 808 2

Concentration						
	Centennial Trail Outfall					
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11	
TSS, mg/L	260	18	164.00	260	54	
TP, mg/L	0.261	0.062	1.02	0.345	0.223	
Lead, mg/L	0.018	ND	0.013	0.02	ND	
TN, mg/L	1.05	0.76	3.40	1.64	2.8	
Zinc, mg/L	0.29	0.11	0.37	0.37	0.33	
Hardness, mg/L	55.2	24.6	90.50	2.55	45.2	
PCBs, ug/L	ND	ND	ND	ND	ND	
Discharge Volume (cubic						
feet)	2,163	9,462	20,545	11,354	18,653	
Discharge volume				-		
(gallons)	16,177	70,773	153,679	84,928	139,524	

2011 Stormwater/Events Data Files/Water Quality Data

Event Pollutant Dis	Event Pollutant Discharge (lbs)					
	4th Avenu	e Outfall				
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11	
TSS	51.79	23.50	517.51	348.42	198.52	
TP	0.06	0.09	4.05	0.58	1.17	
Lead	0.004	ND -	0.040	0.028	ND	
TN	0.29	0.97	17.78	2.40	11.58	
Zinc	0.05	0.06	0.84	0.42	0.50	
Hardness	14.00	33.73	263.86	2.74	135.99	
PCBs	ND	ND	ND	ND	ND	
Discharge Volume (gallons)	45,970	201,120	436,718	241,344	396,494	
Event Precip (inches)	0.08	0.35	0.76	0.42	0.69	
Inches per year =	31.88	Per USBR AgriMet Station RTHI for water year Oct 1 - Sep 30				

Estimated Load/Inch Precip (lbs/inch)							
	4th Avenue	4th Avenue Outfall					
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11		
TSS	647.36	67.13	680.93	829.58	287.72		
TP	0.76	0.25	5.32	1.39	1.70		
Lead	0.05	ND	0.05	0.07	ND		
TN	3.60	2.78	23,40	5 <i>.</i> 71	16.78		
Zinc	0.62	0.16	1.10	1.01	0.72		
Hardness	175.03	96,39	347.18	6.52	197.09		
PCBs	ND	ND	ND .	ND	ND		
Disch Vol (gals.)	45,970	201,120	436,718	241,344	396,494		

2011 Stormwater/Events Data Files/Water Quality Data

Event Pollutant Discharge (lbs)						
,	Centennial T Outfall	Centennial Trail Outfall				
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11	
TSS	35.10	10.63	210.32	184.27	62.87	
ТР	0.04	0.04	1.31	0.24	0.26	
Lead	0.002	ND	0.017	0.014	ND	
TN	0.14	0.45	4.36	1.16	3.26	
Zinc	0.04	0.06	0.47	0.26	0.38	
Hardness	7.45	14.53	116.06	1.81	52.63	
PCBs	ND ·	ND	ND	ND	ND	
	46 477	70.772	152 670	84,928	139,524	
Discharge Volume (gallons)	16,177	70,773	153,679	04,928	133,324	
Event Precip (inches)	0.08	0.35	0.76	0.42	0.69	
Inches per year =	31.88	Per USBR AgriMet Station RTHI for water year Oct 1 - Sep 30				

Estimated Load/Inch Precip (lbs/inch)					
	Centennial 1 Outfall	[rail			
Sample Date	3/10/11	5/7/11	5/15/11	7/13/11	9/27/11
TSS	438.73	30.37	276.74	438.73	91.12
TP	0.44	0.10	1.72	0.58	0.38
Lead	0.03	ND	0.02	0.03	ND
TN	1.77	1.28	5.74	2.77	4.72
Zinc	0.49	0.19	0.62	0.62	0.56
Hardness	93.15	41.51	152.71	4.30	76.27
PCBs	ND	ND	ND	ND	ND
Disch Vol (gals.)	16,177	70,773	153,679	84,928	139,524

2011 Average Annual Load, lbs/day*					
	4th	Centennial	Total		
TSS	44	21	65		
TP	0.16	0.05	0.21		
Lead	0.00302	0.00150	0.00		
TN	0.91	0.20	1.11		
Zinc	0.06	0.03	0.10		
Hardness	14.36	5.10	19.46		
PCBs	ND	ND	ND		

^{*}Estimate only, subject to errors and assumptions.

2011 Average Annual Load, lbs/year*				
	4th	Centennial	Total	
TSS	16,021	7,553	23,574	
TP	60.1	18.2	78.2	
Lead	1.10	0.55	1.65	
TN	333.26	73.70	406.96	
Zinc	23.0	12.3	35.3	
Hardness	5,242	1,860	7,102	
PCBs	ND	ND	ND	
*Estimate only, subject to error	s and assumptions.			

2012 Stormwater/Events Data Files/Water Quality Data 4th Avenue Outfall

	PQL	Method
TSS, mg/L	1	SM2540
TP, mg/L	0.025	EPA365.3
Lead, mg/L	0.01	SM3120
		SM 4500N
TN, mg/L	0.08	B/4110
Zinc, mg/L	0.013	SM3120
Hardness, mg/L	0.2	SM2340
PCBs, ug/L	0.2	EPA 808 2

Concentration					
	4th Avenue	Outfall		`	
Sample Date	3/12/12	4/4/12	5/2/12	7/15/12	10/15/12
TSS	208	80	30	74	120
TP	0.27	0.14	0.09	0.26	0.21
Lead	0.016	ND	· ND	ND	ND
TN	1.25	2.90	2.80	1.19	0.98
Zinc	0.23	0.13	0.05	0.08	0.34
Hardness	65.60	36.60	19.80	15.70	18.80
PCBs	ND	ND	ND	ND	ND
Discharge Volume	24 502	26.440	42.000		20.4770
(gallons)	24,583	26,119	13,060	71,444	39,179
Event Precip (inches)	0.32	0.34	0.17	0.93	0.51
Inches per year =	31.88	Per USBR Agril	Met Station RTHI	for water year C	Oct 1 ~ Sep 30

2012 Stormwater/Events Data Files/Water Quality Data Centennial Trail Outfall

	PQL	Method
TSS, mg/L	1	SM2540
TP, mg/L	0.025	EPA365.3
Lead, mg/L 🕟	0.01	SM3120
•		SM 4500N
TN, mg/L	0.08	B/4110
Zinc, mg/L	0.013	SM3120
Hardness, mg/L	0.2	SM2340
PCBs, ug/L	0.2	EPA 808 2

Concentration						
	Centennial '	Centennial Trail Outfall				
		,				
Sample Date	3/12/12	4/4/12	5/2/12	7/15/12	10/15/12	
TSS	304	75	134	378	120	
TP	0.33	0.13	0.16	0.65	0.21	
Lead	0.020	ND	ND	0.021	ND	
TN	1.66	2.80	3.80	1.86	0.98	
Zinc	0.56	0.15	0.25	1.23	0.34	
Hardness	135.00	26.00	20.20	34.20	18.80	
PCBs	ND	ND	ND	ND	ND	
Discharge Volume (gallons)	8,651	9,191	4,596	25,141	13,787	
Event Precip (inches)	0.32	0.34	0.17	0.93	0.51	
Inches per year =	31.88	Per USBR AgriMet Station RTHI for water year Oct 1 - Sep 30				

Estimated Load/Inch Precip (lbs/inch)						
	4th Avenue Outfall					
Sample Date	3/12/12	4/4/12	5/2/12	7/15/12	10/15/12	
TSS	133.3446	51.2864	19.2324	47.4399	76.9296	
ТР	0.1705	0.0878	0.0571	0.1673	0.1365	
Lead	0.0103	ND	ND	ND	ND	
TN .	0.8013	1.8591	1.7950	0.7629	0.6308	
Zinc	0.1474	0.0833	0.0321	0.0494	0.2180	
Hardness	42,1	23.5	12.7	10.1	12.1	
PCBs	ND	ND	ND	ND	ND	
Disch Vol (gals.)	24,583	26,119	13,060	71,444	39,179	

Estimated Load/Inch Precip (lbs/inch)

	Centennial Trail Outfall						
Sample Date	3/12/12	4/4/12	5/2/12	7/15/12	10/15/12		
TSS	68.5803	16.9195	30.2295	85,2742	27.0712		
TP	0.0744	0.0287	0.0365	0.1471	0.0481		
Lead	0.0045	ND	ND	0.0047	ND		
TN	0.3745	0.6317	0.8573	0.4196	0.2220		
Zinc	0.1263	0.0338	0.0564	0.2775	0.0767		
Hardness	30.4551	5.8654	4.5570	7.7153	4.2412		
PCBs	ND	ND	ND	ND	ND		
Disch Vol (gals.)	8,651	9,191	4,596	25,141	13,787		

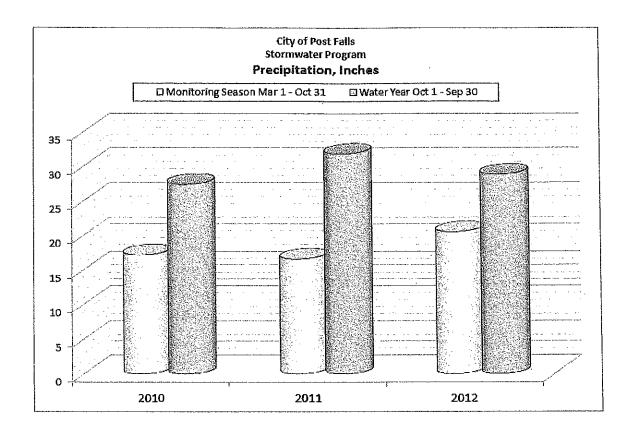
2012 Average Annual Load, lbs/day*					
	4th	Centennial	Total		
TSS	5.20	3.18	8.38		
TP	0.01	0.00	0.01		
Lead	0.00	0.00	0.0003		
TN	0.09	0.04	0.13		
Zinc	0.01	0.01	0.02		
Hardness	1.59	0.77	2,36		
PCBs	ND	ND	ND		

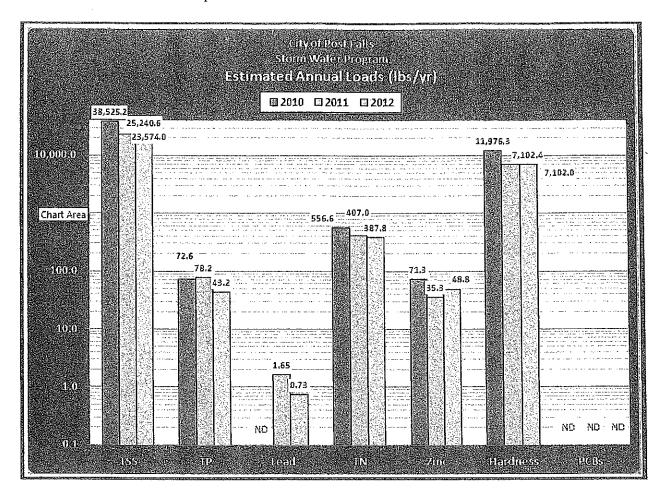
2012 Average Annual Load, lbs/year*					
	4th	Centennial	Total		
TSS	1,897	1,161	3,058		
ТР	3.6	1.7	5.2		
Lead	0.06	0.05	0.11		
TN	33.8	13.2	47.0		
Zinc	3.1	2.9	5.9		
Hardness	580	281	860		
PCBs	ND	ND	ND		

^{*}Estimate only, subject to errors and assumptions.

ESTIMATED ANNUAL LOADS (ibs/yr)

4th Avenue Outfall							
_	TSS	TP	Lead	TN	Zinc	Hardness	PCBs
2010	20,105.8	45.9	ND	385.9	28.8	7,437.7	ND
2011	16,021.1	60.1	1.10	333.3	23.0	5,242.3	ND
2012	1,896.5	3.6	0.06	33.8	3.1	579.7	ND
Centenni	al Trail Outfall						
	TSS	TP	Lead	TN	Zinc	Hardness	PCBs
2010	18,419.4	26.8	ND	170.7	42.5	4,538.6	ND
2011	7,552.9	18.2	0.55	73.7	12.3	1,859.7	ND
2012	1,161.4	1.7	0.05	13.2	2.9	280.8	ND
Combine	Combined (4th + Centennial)						
	TSS	TP	Lead	TN	Zinc	Hardness	PCBs
2010	38,525.2	72.6	ND	556.6	71.3	11,976.3	ND
2011	23,574.0	78.2	1.65	407.0	35.3	7,102.0	ND
2012	3,057.9	5.2	0.11	47.0	5.9	860.5	ND





APPENDIX – C ASSESSMENT OF CONTROL MEASURES

ASSESSMENT OF PROGRAM CONTROL MEASURES

This section of the Annual Storm Water Report summarizes the progress and status of complying with Sections II.B. and II.C. of the MS4 discharge permit. In the following account, the permit requirement is highlighted in bold and the status is in regular font

Section II. B. Minimum Control Measures

1. Public Education and Outreach

a.) Within two years of the effective date of the permit, permittee must develop and implement a public education program about the impacts of storm water on the local water bodies.

This requirement has been met with the deployment and implementation of the Storm Water Management Plan that is posted on the City's website and detailed in this and prior annual reports (also posted on the City's website). Public education efforts have been conducted since January 2010 via provision of brochures, internet postings, outreach events, article submissions to the local paper, public service announcements on the City's TV channel, facility tours and direct mailings to the public.

b) At least once per year, the permittee must distribute appropriate storm water educational materials to the target audiences.

On August 30 and 31, 2012, an informational letter that defines illicit discharges and how to prevent them was hand delivered and/or mailed directly to all property owners and occupants of property located adjacent to the MS4 storm sewer system. There were 144 letters that were hand delivered and 92 letters were delivered via USPS mail. A copy of the letter is provided below:



<u>Public Works Department</u> Water Reclamation Division

August 30, 2012

Notice: Illicit Discharge Information

Dear Customer:

You have received this notice because your residence or place of business is adjacent to the City's storm sewer system, and we need to inform you about illicit discharges to the storm sewers. An illicit discharge is any discharge to the storm sewer system that is not composed entirely of storm water. Illicit discharges are prohibited by ordinance (Chapter 13.44.100) and subject to enforcement action (Chapter 13.44.120). Residents and businesses located near Spokane Street and the connecting side streets need to be especially aware that the street gutters and drains lead to the Spokane River via the storm sewer system.

Storm water pollution can end up in the Spokane River and could possibly harm aquatic life or violate Idaho water quality standards. Such violations could be costly to the City and the responsible party to correct.

The City's storm sewer system is a series of underground pipes that conveys storm water runoff in streets and gutters to a discharge pipe, or outfall, near the Spokane River. The City has two storm water outfall pipes and these are located near Falls Fark at the west end of 4th Avenue. The outfalls discharge storm water run-off from Spokane Street and the streets that connect to it between 3th and 16th Avenues.

Please do not place or allow yard clippings, leaves, gas, oil, paints, antifreeze, fertilizer, sediment, mud or any other chemical or debris into the streets and gutters since this material will get into the storm sewer and the river. Your help in preventing storm water pollution is very much appreciated.

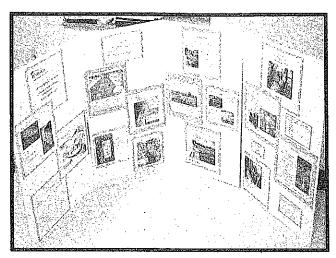
If you have any questions or would like additional information, feel free to call the Storm Water Program at 208-777-9857, or click on "Storm Water" in the "Quicklinks" menu on the City's website: postfallsidaho.org

Sincerely,

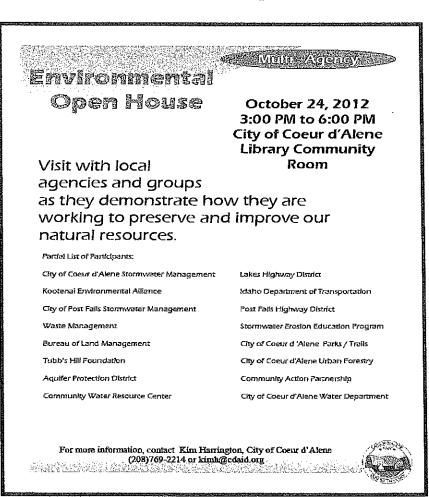
Mike Neher Environmental Manager

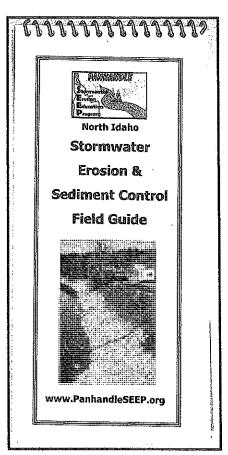
2002 West Seltice Way, Post Falls, ID 83854 * tel (208)773-1438 * flox (208)773-0311 * www.postfallsidaho.org

On April 19, 2012, the City participated in Science Day at Silverwood Theme Park by providing an informational board that displayed storm water management systems including the hydrologic cycle, grassy swales, dry wells and storm sewers.

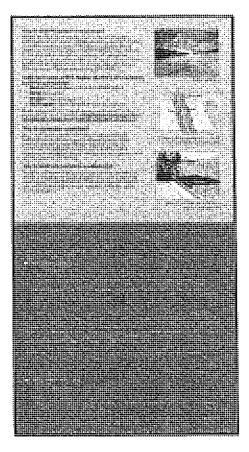


On October 24, 2012, the City participated in the Environmental Open House by providing the informational board depicted above and answering questions from the public. The City advertised this event on its Twitter and Facebook internet pages.





At the building permit service counter, the City continues to make available to the public useful information about the Construction General Permit as well as the Stormwater Erosion & Sediment Control Field Guide.



c) At least once per year, the permittee will prepare and distribute appropriate information relevant to the SWMP to the local newspaper and at least one media outlet.

A public service announcement (PSA), professionally produced on behalf of Panhandle Area Council http://www.pacni.org/, was repeatedly broadcast on City Cable TV 13 beginning in February 2010. In early 2011 the PSA was inadvertently dropped from programming but was reinstated as of March 26, 2012 and continues to run three times per week at 8 a.m. Sunday, 10:30 a.m. Tuesday and 9 p.m. Friday. The PSA runs for eight minutes and provides a good overview of erosion, causes, water quality impacts and best management practices for controlling or preventing erosion on construction sites and developments. Panhandle Area Council sponsors the Stormwater and Erosion Education Program which provides classroom and hands-on training to area contractors and government representatives.

A4 The Press Thursday, October 4, 2012

Home projects can result in runoff pollution

Residents urged to do their part for cleaner river

From the Post Falls Water Division

Many of the materials that we use in our home improvement projects have the potential to pollute storm water if not disposed of properly, according to the city of Post Falls.

Materials such as paint, yard debris, sawdust, stucco, drywall, dirt, concrete and chemicals, if washed down a storm drain, can contaminate the Spokane River and beaches.

As a riverside community, Post Falls relies on clean water for its residents, a healthy river, public safety and a desirable environment for wildlife.

When it rains, many of the pollutants that get onto our streets, sidewalks, parking lots and gutters wash down the storm drains and into the river. Unfortunately, storm drains do not filter water or debris, nor are they connected to the wastewater treatment plant, so any pollutant that flows into the storm drain ends up in the river.

Urban runoff pollutants come from leaking cars, household chemicals, building materials pet and yard waste, soil erosion and litter.

Urban runoff pollution is preventable. Post Falls residents are encouraged to work together to create a cleaner community.

Painting tools should never be rinsed in the street or any area that might flow to the street. Oil-based paints and solvents can only be disposed of at a hazardous waste collection site.

It is illegal to deposit debris or dirt within the public right of way without permission of the city. If you must temporarily stockpile soil, locate and cover it with a tarp where it cannot be tracked or washed onto the street.

Keep trash and other debris contained so that wind cannot blow it off of the property.

Building materials such as sawdust, dirt, grout, mortar, gypsum compound or drywall mud, plaster or stucco and concrete can't be placed upon or washed into swales, streets, gutters or storm drains.

If an accidental spill of any liquid building material or other hazardous waste occurs, absorbents or kitty litter must be applied immediately to prevent the spill from entering a storm drain.

Once the spill has been contained, contact your trash disposal company or Panhandle' Health District for instructions on how to dispose of it.

The Post Falls Water Division can be reached at 777-9857. On October 4, 2012, our local newspaper, <u>The Press</u>, published the City's submitted article entitled "Home projects can result in runoff pollution."

2. Public Involvement Participation

a) The permittee must comply with applicable State and local public notice requirements when implementing a public involvement/participation program.

The City abides by the Idaho Open Meeting Law in the performance of its duties, including adoption of rules and regulations.

b) The permittee must make all relevant SWMP documents and all Annual Reports required by this permit available to the public. Within two years of the effective date of this permit, all SWMP documentation and Annual Reports must be posted online through its regularly maintained website (or a website sponsored by the permittee).

All relevant SWMP documents and all Annual Reports required by this permit are available to the public and posted online at the City's official website: http://www.postfallsidaho.org/

3. Illicit Discharge Detection and Elimination

a) Within two years from the effective date of this permit, the permittee must develop and implement a program to detect and eliminate illicit discharges from the MS4 including roadways and associated drainage facilities, ditches, pipes, culverts, catch basins and retention ponds in its jurisdiction. This program must include written spill response procedures to ensure protection of the permittee's MS4. The program must include procedures for detection, identification of the source, and removal of non-storm water discharges from the MS4. This program must address illegal dumping into the MS4, and include training for City staff on how to respond to reports of illicit discharges. The permittee must develop an information management database system to track the activities and actions of the program.

Procedures for implementing the Illicit Discharge Detection and Elimination Program were completed in 2010 and are included in the City's Storm Water Management Plan which is posted on the City's website.

b) Within two years from the effective date of this permit, the permittee must effectively prohibit non-storm water discharges into the MS4 through an ordinance or other regulatory mechanism to the extent allowable under state or local law. The permittee must implement appropriate enforcement procedures and actions, including a written policy for enforcement escalation procedures for recalcitrant or repeat offenders.

In 2010, the City updated its Storm Water, ordinance, Chapter 13.44, to define and prohibit illicit discharge, and developed and implemented enforcement procedures

which are documented in the Storm Water Management Plan and posted on the City's website.

c) Through the ordinance or other regulatory mechanism set forth in Section II.B.3.b, the permittee must prohibit any of the non-storm water flows listed in Part I.C.1.c only if such flows are identified (by EPA or the permittee) as a source of pollutants to the MS4. The permittee must document to EPA in the Annual Report any existing local controls or conditions placed on the non-storm water discharges.

In 2010, the City updated its Storm Water, ordinance, Chapter 13.44, to define and prohibit illicit discharge, and developed and implemented enforcement procedures which are documented in the Storm Water Management Plan and posted on the City's website. The City's ordinances are available to the public on the City's website: http://www.postfallsidaho.org/ Allowable non-storm water discharges from potable water sources include fire fighting activities, water distribution system maintenance, street wash water, overspray and small amounts of runoff from irrigation of vegetation that comply with the City's prohibition of water wasting, Chapter 13.12.060.

d) Within two years from the effective date of this permit, the permittee must update and complete its comprehensive MS4 map. At a minimum, the map(s) must show jurisdictional boundaries, the location of all City-owned or operated storm sewers, culverts, ditches, and other conveyances, the location of all inlets and outfalls, points at which the permittee's MS4 is interconnected with other MD4's, names and locations of all waters that receive discharges from those outfalls, and locations of all municipally-owned or operated facilities, including all maintenance/storage facilities and public or private snow disposal sites. Locations of all outfalls must also be provided in latitude and longitude, and the diameter of all outfalls must be provided with the map. The maps must be available in electronic or digital format as appropriate. A copy of the completed maps(s); as both a report and as an electronic file via Arc GIS format, must be submitted to EPA and IDEQ as part of the corresponding Annual Report.

The City completed a comprehensive MS4 map in 2009 and posted it in PDF format on the City's website. In 2012, the MS4 map was converted to Arc GIS format and replaced the PDF formatted map on the City's website. Copies of these maps have been submitted electronically and in hard copy to EPA and IDEQ in 2010, 2011, and 2012.

e) Within two years from the effective date of this permit, the permittee must begin an ongoing education program to inform users of the system, especially public employees, businesses, and the general public, of hazards associated with illegal discharges and improper disposal of waste. This program must be conducted in concert with the public education requirements outlined in Part II.B.1.

The City initiated its ongoing education program in 2010. The program includes informing the public, users of the MS4 and public employees of the City of Post Falls of the hazards associated with illegal discharges and improper disposal of waste. Further documentation of the public outreach component of Section II. B. 1. is provided in the prior section of this Appendix. City employees associated with the MS4 facilities, development services and field staff have been provided annual storm water education since 2010. Topics have included proper storage of materials, street maintenance, parks maintenance and illicit discharges.

begin dry weather field screening for non-storm water flows from all stormwater outfalls. By the expiration date of the permit, 100% of the permittee's outfalls within the Coeur d'Alene Urbanized Area must be screened for dry weather flows. The screening should include field tests of selected parameters as indicators of discharge sources. Screening level tests may utilize less expensive "field test kits" using test methods not approved by EPA under 40 CFR Part 136, provided the manufacturer's published detection ranges are adequate for the illicit discharge detection purposes. The permittee must investigate any illicit discharge within fifteen (15) days of its detection, and must take action to eliminate the source of the discharge within 45 days of its detection.

The City initiated dry weather field screening of the MS4 system in 2011. The results of the screening were posted with the 2011 annual report. The City has only two (2) outfalls, and 100% of those outfalls were screened for dry weather flows in 2011. The only source of dry weather flows was from irrigation runoff. No industrial discharges were found. In 2012, the City conducted dye testing of a dry cleaner business on Spokane Street and found that there was not an illicit discharge to the MS4 system. In November and December 2012, the City conducted a survey of jurisdictional roads and properties adjacent to the Spokane River and did not detect any illicit discharges to the MS4 or storm water discharges or industrial discharges to the river.

g) Within three years from the effective date of this permit, the permittee must inventory all industrial facilities that discharge into the permittee's MS4 and/or directly to waters of the United States located within the Coeur d'Alene Urbanized Area and submit this inventory as part of the corresponding Annual Report. The types of industrial facilities that must be inventories are set forth in 40 CFR § 122.26(b)(14)(i-x) through (xi). This inventory must include the location of the facility, the location of its outfall, and the NPDES permit status for its storm water discharges.

In December 2012, the City conducted a visual survey of industrial properties adjacent to the river in the Riverbend Industrial Park and did not detect any industrial or storm water discharges to the river. The 2011 Survey did not detect any existing industrial discharges to the City's MS4 system. There have been no new industries

added to the MS4 system. Developments within the City are required to provide onsite storm water management. The City's nearly universal system of curbs, gutters and bio-filtration swales helps prevent storm water discharges outside of the MS4 facilities. Soils in the City are typically sand and gravel and are highly suited to onsite disposal of storm water via bio-filtration swales and drywells. An end-to-end survey of perimeter roads adjacent to the river in November and December 2012 did not detect any storm water discharges to the river.

4. Construction Site Storm Water Runoff Control

a) Within two years from the effective date of this permit, the permittee must implement and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities resulting in land disturbance of greater than or equal to one acre. This program must also include controls for pollutants in such storm water discharges from activity disturbing less than one acre, if that construction activity is part of a larger common plan of development or sale that disturbs one acre or more.

In 2010, the City adopted ordinances regarding construction sites, as Chapter 13.44.050, General Requirements, section E., which requires developers to verify applicability of the Construction General Permit by either providing a copy of their Notice of Intent (NOI) for coverage under the CGP, or a design professional's certification that the project is exempt from the CGP. Projects that are subject to the CGP must maintain a copy of their Storm Water Pollution Prevention Plan (SWPPP) at the project site. CGP-covered projects with the potential to discharge storm water to the MS4 system are inspected during the construction project. In 2010, the City developed a procedure for such inspections which is included in the Storm Water Management Plan posted on the City's website.

b) The permittee must provide appropriate information and direction to representatives of proposed new development and redevelopment construction projects concerning the NPDES General Permit for Storm Water Discharges for Construction Activity in Idaho, #IDR10-0000 (Construction General Permit).

When developers and contractors come in to City hall for a building permit, they are informed of the CGP requirement stated above.

c) Within two years from the effective date of this permit, the permittee must adopt an ordinance or other regulatory mechanism to the extent allowable under state and local law that requires construction site operators to practice appropriate erosion, sediment and waste control. This ordinance or regulatory mechanism must include sanctions to ensure compliance. The permittee may evaluate any existing procedures, policies, and authorities pertaining to activities occurring on their property that may be used to assist in the development of the required regulatory mechanism.

The City's existing ordinance, Chapter 8.24, Refuse and Stagnant Water, prohibits the accumulation of any stagnant water or impure water, refuse, vegetable decay or decaying substance, garbage or filth of any kind, nor suffer such yard, lot, place, building or premises to be or to remain in such condition as to cause or create a nuisance or offensive smell or to pollute or render unhealthful the atmosphere or the premises or create a rodent harborage, or thereby to be, become, cause or create a public nuisance. More importantly, all development projects requiring a storm water management system shall provide grass infiltration areas or acceptable alternatives (Chapter 13.44.060), thus prohibiting new discharges of storm water to the MS4. Further, Chapter 13.44.100, Prohibited Conduct, prohibits any person from damaging or impairing any of the grass infiltration areas or any portion of the stormwater management system:

13.44.100: PROHIBITED CONDUCT:

- A. No person shall cause, permit or contribute to illicit discharges to the MS4.
- B. No person shall damage, harm, fail to install or complete, or otherwise impair the grass infiltration areas, approved methods of transmission of stormwater to grass infiltration areas or any portion of the stormwater management system required to be installed pursuant to this chapter. Unless other provisions are made in the process of development review and approval, responsibility for maintenance of stormwater system elements remains with the property owner and violation of these maintenance requirements shall also constitute a violation of this chapter. Occupancy of a dwelling or building without having first obtained a certificate of occupancy, when compliance of this chapter is a condition precedent to issuance of the certificate of occupancy, is a violation of this chapter, in addition to any building and zoning ordinance from which the occupancy requirement derives. (Ord. 1188 § 2, 2010)
- d) Within two years from the effective date of this permit, the permittee must publish and distribute local requirements for construction site operators to implement appropriate erosion and sediment control BMPs and to control waste (such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site) that may cause adverse impacts to water quality.

At the building permit service counter, the City continues to make available to the the Stormwater Erosion & Sediment Control Field Guide. A public service announcement (PSA), professionally produced on behalf of Panhandle Area Council http://www.pacni.org/, continues to run three times per week at 8 a.m. Sunday, 10:30

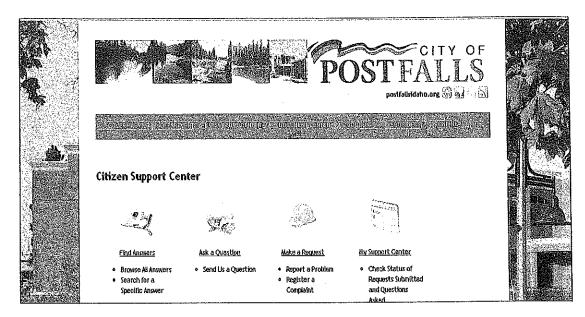
a.m. Tuesday and 9 p.m. Friday. The PSA runs for eight minutes and provides a good overview of erosion, causes, water quality impacts and best management practices for controlling or preventing erosion on construction sites and developments. Panhandle Area Council sponsors the Stormwater and Erosion Education Program which provides classroom and hands-on training to area contractors and government representatives.

e) Within two years from the effective date of this permit, the permittee must develop procedures for reviewing all pre-construction site plans for potential water quality impacts, including erosion and sediment control, control of other wastes, and any other impacts according to the requirements of the law, ordinance, or other enforceable mechanism created to comply with Part II.B.4.c. These procedures must include provisions for receipt and consideration of information submitted by the public.

The City reviews all new development/construction plans prior to issuing construction permits. Every new development plan is reviewed for compliance with the City's ordinances, including the Storm Water Management ordinance. Further details of storm water controls for new projects are provided in the Construction Improvement Agreement required of all new developments. See: http://www.postfallsidaho.org/PZDept/pzforms/ResidentialConstImprovementAgreement.pdf

The City allows plat recordation once all approvals and agreements are in place and the public improvements are bonded for at 150% of the engineers estimate. Prior to the City accepting the constructed improvements, storm water facilities are to be at the following stages – grassy swales are to be roughed in, top soil placed and hydroseeded and additional storm water facilities, such as drywells, scuppers, catch basins and piping need to be completed. As the majority of our grassy swales are continual swales that run parallel to the roadways, when the lots are developed, the swales will receive final grading, final hydro-seeding or top soil. Those facilities are inspected in accordance with the City's "Engineering Project Certification and Quality Control Standards" prior to issuing a certificate of occupancy for those developing lots.

f) Within three years from the effective date of this permit, the permittee must implement a program to receive, track, and review information submitted by the public regarding construction site erosion and sediment control complaints.



The City provides several avenues for citizens to register complaints or inquire about the storm water program. Complaints or concerns may be delivered to the City via email, telephone, letter or in person at City Hall. In addition, the City maintains a "Citizen Support Center" on its website, inviting the public to inquire, make suggestions or complain about any pertinent matter. In 2012, the Storm Water Program received no complaints about runoff or sediment from construction sites in the City of Post Falls that disturbed one or more acres or less than one acre that was a part of larger project that disturbed one or more acres and had the potential to discharge to the MS4 system.

g) Within three years from the effective date of this permit, the permittee must develop and implement procedures for site inspection and enforcement of control measures established as required in Parts II.B.4.c and d, including a written policy of enforcement escalation procedures for recalcitrant or repeat offenders. As part of these procedures, the permittee shall inspect all construction sites in their jurisdiction for appropriate erosion/sediment/waste control at least once per construction season.

In 2010, the City developed and implemented procedures for site inspection and enforcement of control measures, which is posted on the City's website as part of the Storm Water Management Plan. In 2012, there was one (1) construction project in the City of Post Falls that disturbed more than one acre and had the potential to discharge to the MS4 system. This project was the Blue Dog RV dealership located at 714 W. Seltice Way. The City required the project to apply for coverage under the Idaho Construction General Permit and the City verified that the project owner had a

storm water management plan on-site. Storm water technician, Adam Tate, inspected the project on March 29, 2012, April 26, 2012, May 21, 2012 and June 28, 2012. The June 28, 2012, inspection resulted in a verbal order for the contractor to maintain the silt fence. The project soils were stabilized and the project was completed by the end of summer 2012.

h) The permittee must comply with the Construction General Permit and all relevant local requirements for erosion, sediment and onsite materials control on public construction projects. The permittee must ensure that all contractors working on behalf of the permittee are complying with the Construction General Permit and all relevant local requirements for erosion, sediment, and onsite materials control on construction projects. The permittee must incorporate specific language in all contracts ensuring appropriate storm water management on all public construction projects.

The City had no projects applicable to the CGP in 2012.

- 5. Post-Construction Storm Water Management in New Development and Redevelopment
- a) Within three years from the effective date of this permit, the permittee must implement a program to address post-construction storm water runoff from new development projects that disturb greater than or equal to one acres (including projects less than one acre that are part of a larger common plan of development or sale) and that result in discharge into the permittee's MS4. The program must ensure that controls are enacted that will prevent or minimize water quality impacts from newly developed or redeveloped areas.

The City had no projects applicable to this requirement in 2012.

b) Within three years from the effective date of this permit, the permittee must adopt an ordinance or other regulatory mechanism to the extent allowable under State or local law to address post-construction runoff from new development and redevelopment projects. If such requirements do not currently exist, development and adoption of an ordinance is required. The permittee may evaluate and update existing procedures, policies, and authorities (e.g., Post Falls City Ordinance #716) to assist in the development of the required regulatory mechanism.

The City has had a Storm Water Management ordinance since 2007, updated in 2010. The SWM ordinance, Chapter 13.44, requires the installation of storm water management facilities for all new developments and the protection and maintenance of all such facilities such that storm water is not discharged off site. See: http://www.sterlingcodifiers.com/codebook/index.php?book id=350

c) Within three years from the effective date of this permit, the permittee must ensure proper long term operation and maintenance of permanent storm water management controls located within its jurisdiction.

The City has in place appropriate regulatory controls to ensure long term operation and maintenance of permanent storm water controls. SWM ordinance, Chapter 13.44, requires the landowner to maintain storm water facilities such that storm water is not discharged off site, and prohibits any person from damaging, harming, failing to install or complete or otherwise impair the storm water management systems. See: http://www.sterlingcodifiers.com/codebook/index.php?book_id=350

d) Within four years from the effective date of this permit, the permittee must develop and implement a process for pre-construction plan review of permanent storm water management controls and inspection of such controls to ensure proper installation and appropriate long term maintenance and operation.

The City reviews all new development/construction plans prior to issuing construction permits. Every new development plan is reviewed for compliance with the City's ordinances, including the Storm Water Management ordinance. Further details of storm water controls for new projects are provided in the Construction Improvement Agreement required of all new developments. See: http://www.postfallsidaho.org/PZDept/pzforms/ResidentialConstImprovementAgreement.pdf

The City allows plat recordation once all approvals and agreements are in place and the public improvements are bonded for at 150% of the engineers estimate. Prior to the City accepting the constructed improvements, storm water facilities are to be at the following stages — grassy swales are to be roughed in, top soil placed and hydroseeded and additional storm water facilities, such as drywells, scuppers, catch basins and piping need to be completed. As the majority of our grassy swales are continual swales that run parallel to the roadways, when the lots are developed, the swales will receive final grading, final hydro-seeding or top soil. Those facilities are inspected in accordance with the City's "Engineering Project Certification and Quality Control Standards" prior to issuing a certificate of occupancy for those developing lots.

- 6. Pollution Prevention and Good Housekeeping for Municipal Operations
- a) Within two years from the effective date of this permit, the permittee must develop and implement an operation and maintenance program intended to prevent or reduce pollutant runoff from municipal operations. This program must address municipal activities occurring within the permittee's jurisdiction

with potential for negative storm water related water quality impacts, including the use of sand and road deicers; fleet maintenance and vehicle washing operations; street cleaning and maintenance; grounds/park and open space maintenance operations; building maintenance; solid waste transfer activities; water treatment plant operations; storm water system maintenance; and snow disposal site operation and maintenance. Examples of other municipal activities which may also be evaluated as relevant to the jurisdiction include, but are not limited to: materials storage; hazardous materials storage; used oil recycling; spill control and prevention measures for municipal refueling facilities; municipal golf course maintenance; municipal new construction and land disturbances; and snow removal practices.

The City developed a Storm Water Pollution Prevention Plan for the wastewater and streets/fleet maintenance site in 2010, even though these facilities cannot discharge to the MS4 system. The plan is posted on the City's website. The City does not have maintenance facilities that are proximate to the MS4 system. The City does not have a municipal golf course, nor operate solid waste transfer facilities, nor have water treatment plant operations, nor have municipal refueling facilities. The City does not store on site sand or de-icer chemicals. The use of sand and road de-icer is in accordance with conventional practices for highway safety. The City conducts street sweeping on a regular basis; a total of 2,216 cubic yards of dirt and debris were removed from City streets in FY2012.

The City inspected the two storm water outfalls and performed water quality monitoring as required by permit; located catch basins and manholes by GPS; cleaned catch basis with a vacuum truck, installed "do not dump" signs on catch basins along the main trunk of the MS4 system; and hand delivered and direct mailed information to all MS4 users.

b) Within two years from the effective date of this permit and annually thereafter, the permittee must develop and conduct appropriate training for municipal employees related to optimum maintenance practices for protection of water quality. This training must be conducted at least once annually and address the activities specified in Part II.B.6.a.

In 2011, City employees received storm water training in the areas of fleet maintenance, material storage, parks and grounds maintenance, solid waste disposal and/or streets and drainage maintenance. The training materials were provided by the Texas Council on Environmental Quality and USEPA.

In 2012, City employees selected storm water training from a number of sources, including <u>Storm Water Pollution Awareness and Prevention Training</u> (University of Colorado at Denver) which covered illicit discharge, sources of pollution, allowable non-storm water discharges, vehicle washing and fueling, outdoor storage, waste

containers and drum management, vehicle parking lots, grounds maintenance, good housekeeping, preventive maintenance, and spill prevention and response. Other training materials provided were <u>Storm Water: Why Take It Personally?</u> (North Central Texas Council of Governments), <u>Stormwater video</u> (City of Sandy Springs), and <u>Stormwater Runoff 101</u> video (National Resource Defense Council).

The City's storm water technician completed a two day course in construction site erosion control and the Construction General Permit.

c) Within two years from the effective date of this permit, the permittee must prepare and implement storm water pollution prevention plans for the permittee's fleet maintenance/street department site and waste water treatment plant.

The City developed and implemented a storm water pollution plan for the fleet maintenance/street department site and wastewater treatment plan in 2010. The SWPP is posted on the City's website as part of the Storm Water Management Program document. It should be noted that none of these facilities has the potential to discharge to the MS4 because of their physical separation from the MS4.

C. Discharges to Water Quality-Impaired Receiving Waters.

1. The permittee must conduct storm water discharge and receiving water monitoring as required in Part IV.

Since 2009, the City has conducted storm water discharge and receiving water monitoring as required in Part IV. The results are found in Appendix – B of this report.

2. The permittee must determine whether storm water discharges from any part of the MS4 contribute pollutants of concern, either directly or indirectly, to any Clean Water Act ("CWA" or "Act") Section 303(d) listed water bodies. For the purposes of this permit, the Section 303 (d) listed water bodies according to the IDEQ 2002 Integrated Report and the 2004 Washington Water Quality Assessment Report include but are not limited to, the Spokane River and associated tributaries. "Pollutant(s) of concern" refer to the pollutant(s) identified as causing or contributing to the water quality impairment. Pollutants of concern for the purposes of this permit are metals, (specifically, lead and zinc), nutrients (specifically phosphorus and nitrogen), sediment, dissolved oxygen, total polychlorinated biphenyls, and temperature.

The City of Post Falls' MS4 contributes pollutants indirectly to the Spokane River, including lead, zinc, phosphorus, nitrogen, suspended solids and temperature. An assessment of the contribution of pollutants to the river is included in the following:

MS4 Total Annual Loads, lbs/year

Combined (4th +

Centennial)

Year	TSS	TP	Lead	TN	Zinc	Hardness	PCBs
2010	42,541	80	ND	615	79	13,225	ND
2011	23,589	78	1.7	407	35	7,106	ND
2012	26,207	45	8.0	403	50.7	7 , 374	ND

Total Annual Loads,

lbs/day

Combined (4th +

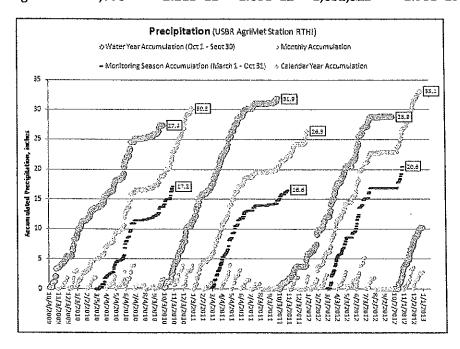
Centennial)

Year	TSS	TP	Lead	TN	Zinc	Hardness	PCBs
2010	117	0,22	ND	1.68	0.22	36	ND
2011	65	0.21	0.0045	1.12	0.10	19	ND
2012	72	0.12	0.0021	1.10	0.14	20.2	ND

SPOKANE RIVER FLOWS AT LAKE OUTLET

Annual Average Discharge, Water Year (USGS)

Water Year	Discharge, cubic feet per second	Cubic feet per year	Gallons per γear	MG/yr	Water lbs/yr
2010	4170	1.32E+11	9.84E+11	983,658	8.2E+12
2011	9841	3.10E+11	2.32E+12	2,321,386	1.9E+13
2012	7497	2.36E+11	1.77E+12	1,768,462	1.5E+13
Average=	7,006	2.21E+11	1.65E+12	1,652,522	1,38E+13



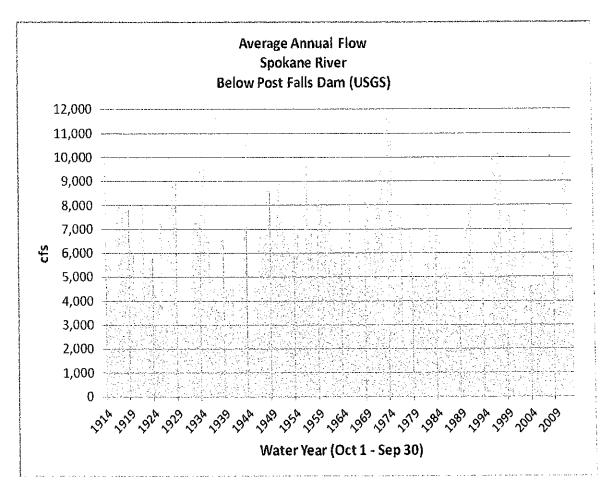
Water Quality Data

Spokane River L	Spokane River Lake Outlet near CdA			(source: US	GS)	USGS Site	12417598	
Date	TSS, mg/L	TP, mg/L	Lead, ug/L	TN, mg/L	Zinc, ug/L	Hardness, mg/L	PCBs, ng/L	
1/27/2010	1	0.005	0.63	na	50	19.1	na	
4 /6/2010	2	0.005	0.73	na	52	20.4	na	
4/26/201 0	1	0.005	1.04	na	51.5	20.1	na	
7/13/201 0	2	<.008	0.96	na	39.6	19. 4	na	
10/14/2010	na	0.004	0.59	na	39.2	20.5	na	
12/20/2010	na	< 0.004	0.51	na	50	21.8	na	
1/20/2011	na	0.006	2.06	na	57.2	22.9	na	
2/16/2011	na	0.01	7.7	na	60	22.4	na	
6/10/2011	na	0.016	4.18	na	69.4	16.2	na	
7/20/2011	na	0.006	1.33	na	33.6	16	na	
10/5/2011	na	0.006	1.07	na	52.8	16.8	na	
2/7/2012	na	0.004	0.51	na	66.7	19.3	na	
2/28/2012	na	0.004	0.49	na	45.5	19.5	na	
3/19/2012	na	0.008	0.78	na	51.5	21.5	na	
4/30/2012	na	0.016	18.1	na	56.7	17.5	na	
7/3/2012	na	0.006	2.04	na	38.1	16.8	na	
10/11/2012	na	na	0.89	na	33.3	19.2	na	
11/23/2012	na	na	0.8	na	43.7	19.6	na	
average 2010	1.50	0.00	0.74	na	47.05	20.22	na	
average 2011	na	0.01	3.27	na	54.60	18.86	na	
average 2012	na	0.01	3,37	na	47.93	19.06	na	

No USGS data for TN or PCBs at this location

Spokane River n	iear Post Falls	s - Corbin Pa	rk	(source: USG	iS)	USGS Site	12419000
Date	TSS ma/i	TD ma/l	Lead, ug/L	TN, mg/L	Zinc, ug/L	Hardness, mg/L	PCBs, ng/L
	TSS, mg/L	TP, mg/L		114, HIB/E			IIB/ L
7/12/2010	2	0.009	1.21	na	39.2	20.1	na
10/15/2010	na	0.012	0.9	na	38.3	21	na
1/20/2011	na	0.009	4.06	na	68.2	23.3	na
6/10/2011	na	0.01	4.52	na	41.7	16.7	na
7/20/2011	na	0.008	1.29	na	31.4	16.4	na
10/6/2011	na	0.007	0.76	na	29	18.1	na
2/28/2012	na	0.007	0.8	na	47	19.8	na
5/1/2012	na	0.016	16.9	na	56.9	17.4	na
7/3/2012	na	0.011	1.96	na	39	16.7	na
10/12/2012	na	na	0.71	na	31.1	20.6	na
average 2010	2.00	0.01	2,06	na	48.57	21.47	na
average 2011	na	0.01	2,66	na	42.58	18.63	na
average 2012	na	0.01	5.09	na	43.50	18.63	na

Recent USGS data for TN at Corbin is not available, but the average from 2003 - 2007 (n=9) = 0.27 mg/L TN. No USGS data for PCBs at this location



Average Annual Water Quality UPSTREAM

Spokane River Lake Outlet near CdA

,			Lead,			Hardness,	PCBs,
	TSS, mg/L	TP, mg/L	mg/L	TN, mg/L	Zinc, mg/L	mg/L	ng/L
average 2010	1.50	0.005	0.0007	na	0.047	20.2	na
average 2011	na	0.009	0.0033	na	0.055	18.9	na
average 2012	na	0.008	0.0034	na	0.048	19.1	na

	River Flow, cfs	River Flow, MG/yr
average 2010	4,170	983,658
average 2011	9,841	2,321,386
average 2012	7,497	1,768,462

DOWNSTREAM

Spokane River near Post Falls - Corbin Park

	TSS, mg/L	TP, mg/L	Lead, mg/L	*TN, mg/L	Zinc, mg/L	Hardness, mg/L	PCBs, ng/L
average 2010	2.00	0.010	0.0021	0.27	0.049	21.5	na
average 2011	na	0.009	0.0027	0.27	0.043	18.6	na
average 2012	na	0.011	0.0051	0.27	0.044	18.6	na

Recent USGS data for TN at Corbin is not available, but the average from 2003 - 2007 (n=9) = 0.27 mg/L TN.

		River
	River Flow, cfs	Flow, MG/yr
average 2010	4,170	983,658
average 2011	9,841	2,321,386
average 2012	7,497	1,768,462

Average Annual River Loadings (lbs/yr)

UPSTREAM

Spokane River Lake Outlet near CdA

	TSS	TP	Lead	TN	Zn	Hardness	PCBs
average 2010	12,312,943	38,991	6,102	na	386,216	165,951,106	na
average 2011	na	170,473	63,308	na	1,057,710	365,355,346	na
average 2012	na	112,159	49,776	na	707,321	281,241,785	na

	Flow
	(MG/yr)
average 2010	983,658
average 2011	2,321,386
average 2012	1,768,462

DOWNSTREAM

Spokane River near Post Falls - Corbin Park

	TSS	TP	Lead	TN*	Zn	Hardness	PCBs	
average 2010	16,417,257	82,086	16,882	2,216,330	398,666	176,211,892	na	_
average 2011	na	164,662	51,481	5,230,432	824,762	360,802,933	na	
average 2012	na	167,255	75,154	3,984,610	641,965	274,864,301	na	

•	Flow
	(MG/yr)
average 2010	983,658
average 2011	2,321,386
average 2012	1,768,462

Combined (4th + Centennial)

MS4		TSS	TP	Lead	TN	Zinc	Hardness	PCBs			
	2010	42,541	80.2	ND	615	78.7	13,225	ND			
	2011	23,589	78.3	1.7	407	35.3	7,106	ND			
	2012	26,207	44.9	0.8	403	50.7	7,374	ND			

MS4		Flow (MG/yr)
	2010	24
	2011	25
	2012	26

Percent Reduction is MS4 Loads, 2010 to 2012

TSS	TP	Lead	TN	Zinc	Hardness	PCBs
38%	44%	NA	34%	36%	44%	NA

LIMITS OF QUANTIFICATION

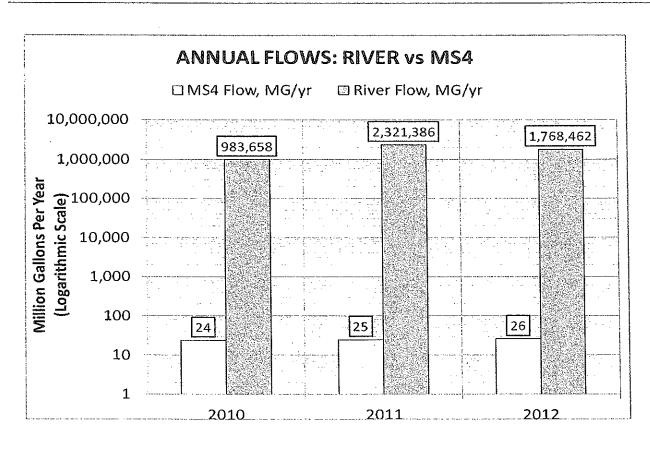
Minimum Levels of Quantification - Concentration (mg/L)

, - ,								
_	TSS	TP	Lead	TN	Zinc	Hardness	PCBs	
USGS (see								
note)	1	0.004	0.00001	0.01	0.0001	0.1	NA	
MS4 (PQL)	1	0.025	0.01	0.08	0.013	0.2	0.0002	

Note: In the absence of "<detection limit" data, USGS MLs are assumed to be the least significant figure of the reported data.

Minimum Levels of Quantification - Annual Load (lbs/yr)

USGS - River	TSS	TP	Lead	TN	Zinc	Hardness	PCBs
2010	8,208,628	32,835	82	82,086	821	820,863	NA
2011	19,371,970	77,488	194	193,720	1,937	1,937,197	NA
2012	14,757,815	59,031	148	147,578	1,476	1,475,781	NA
CPF - MS4	TSS	TP	Lead	TN	Zinc	Hardness	PCBs
2010	196.4	4.9	2.0	15.7	2.6	39.3	0.04
2011	206.8	5.2	2.1	16.5	2.7	41.4	0.04
2012	214.6	5.4	2.1	17.2	2.8	42.9	0.04



RATIOS OF MS4 LOAD TO RIVER LOAD

MS4 LOAD AS A PERCENT OF MINIMUM DECTECTABLE ANNUAL RIVER LOAD

 	TSS	TP	Lead	TN	Zinc	Hardness	PCBs
2010	0.52%	0.24%	NA	0.75%	9.59%	1.61%	NA
2011	0.12%	0.10%	0.85%	0.21%	1.82%	0.37%	NA
2012	0.18%	0.08%	0.52%	0.27%	3.44%	0.50%	NA

CONCLUSION: MS4 loading is less than the minimum measurable load in the river.

MS4 LOAD AS A PERCENT OF UPSTREAM RIVER ANNUAL LOAD

	TSS	ŢΡ	Lead	TN	Zinc	Hardness	PCBs	
2010	0.345%	0.206%	NA	NA	0.020%	0.008%	NA	_
2011	NA	0.046%	0.003%	NA	0.003%	0.002%	NA	
2012	NA	0.040%	0.002%	NA	0.007%	0.003%	NA	

CONCLUSION: MS4 loading is insignificant relative to the loading in the upstream river.

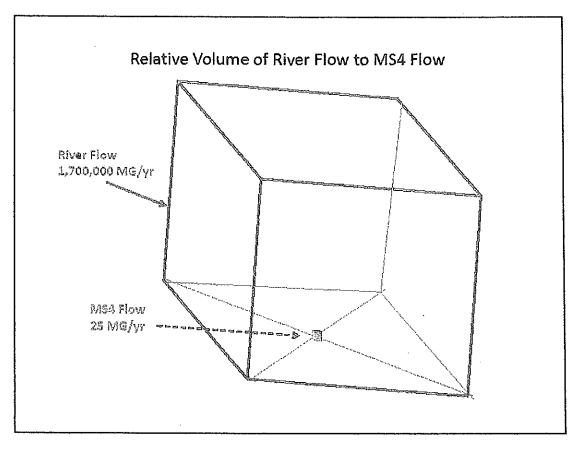
	FLOW
2010	0.0024%
2011	0.0011%
2012	0.0015%

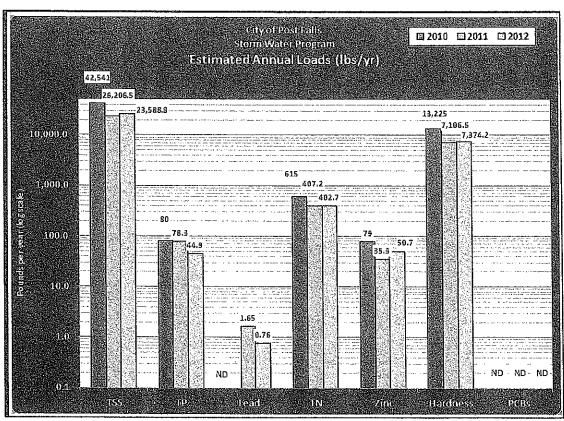
MS4 FLOW VERSUS RIVER FLOW

	MS4 Flow, MG/γr	River Flow, MG/yr	MS4 Flow/River Flow, %
2010	24	983,658	0.002%
2011	25	2,321,386	0.001%
2012	26	1,768,462	0.001%

The annual MS4 flow is insignificant

CONCLUSION: relative to river flow.





CONCLUSIONS

- The volume of water discharged by the Post Falls MS4 has been insignificant compared to the annual river flow. The MS4 contributes about one one-thousandth of one percent of the total river flow.
- The Post Falls MS4 contributed less than one-tenth of one percent of the total loading in the river in 2012.
- Pollutants from the Post Falls MS4 are below the detectable levels of pollutant loadings in the river.
- In spite of higher precipitation in 2012, the pollutant loadings from the Post Falls MS4 have declined 30 to 50 percent since 2010 when water quality monitoring of the MS4 began. We attribute this reduction to data variability and possibly storm drain cleaning in 2011 and 2012.
- The BMPs in place are more than adequate to minimize the effect of MS4 discharges on the quality of water in the Spokane River. The practices of street sweeping and storm sewer cleaning under current schedules are beneficial in the reduction of suspended solids and associated pollutant discharges from the storm water outfalls. We cannot identify any change or improvement in storm water quality that has resulted from public education efforts and the posting of program materials on the City's website. Monitoring the storm water outfalls has produced useful information to help us understand the effects of the MS4 on water quality in the Spokane River. More specifically, the available data indicate that the Post Falls MS4 discharges are of such low volume as to have a negligible, if not unmeasurable impact on the river. No additional BMPs are needed.

3. Within one year from the effective date of this permit, the permittee's Annual Report must include a description of how the activities in each of the minimum control measures in Part II.B will be targeted by the permittee to control the discharge of pollutants of concern, and ensure to the maximum extent practicable that the MS4 discharges will not cause an in-stream violation of the applicable water quality standards. This discussion must specifically identify how the permittee will evaluate and measure the effectiveness of the SWMP to control the discharge of the pollutants(s) of concern. The permittee must submit this section of the SWMP to EPA and IDEQ as part of the first Annual Report required in Part IV.C, and update it as necessary in subsequent Annual Reports.

The City of Post Falls provided its first description of how the activities in each of the minimum control measures in Part II.B will be targeted by the permittee to control the discharge of pollutants of concern, and ensure to the maximum extent practicable that the MS4 discharges will not cause an in-stream violation of the applicable water quality standards, in a letter to EPA and copy to IDEQ dated August 15, 2011. In essence, the measure of control measure effectiveness is the water quality impact the MS4 discharges have on the river.

With three years' data now available, trending analysis can be conducted. The results of this analysis are included in section C.2. above. These data indicate that although the concentrations of some parameters of concern in discharges from the MS4 are higher than the concentration of the same parameters in the river, the resultant impact on instream concentrations and loads is so low as to not be measurable. A mathematical analysis (see section C.2., above) of mass loading indicated that the miniscule volume of the MS4 discharge relative to river flow has no measurable effect on pollutant concentrations in the river. We therefore conclude that discharges from the Post Falls MS4 do not cause Idaho in-stream water quality standards to be exceeded.

APPENDIX - D

RESULTS OF LAST 12 MONTHS OF MONITORING

2012 Stormwater/Events Data Files/Water Quality Data 4th Avenue Outfall

	PQL	Method
TSS, mg/L	1	SM2540
TP, mg/L	0,025	EPA365.3
Lead, mg/L	0.01	SM3120
		SM 4500N
TN, mg/L	0.08	B/4110
Zinc, mg/L	0.013	SM3120
Hardness, mg/L	0.2	SM2340
PCBs, ug/L	0.2	EPA 808 2

Concentration									
	4th Avenue O	4th Avenue Outfall							
	-		***************************************						
Sample Date	3/12/12	4/4/12	5/2/12	7/15/12	10/15/12				
TSS, mg/L	208	80	30	74	120				
TP, mg/L	0.27	0.14	0.09	0.26	0.21				
Lead, mg/L	0.016	ND	ND	ND	ND				
TN, mg/L	1.25	2.90	2.80	1.19	0.98				
Zinc, mg/L	0.23	0.13	0.05	0.08	0.34				
Hardness, mg/L	65.60	36.60	19.80	15.70	18.80				
PCBs, ug/L	ND	ND	ND	ND	ND				
Discharge Volume (cubic feet)	24,583	26,119	13,060	71,444	39,179				
Discharge Volume (gallons)	183,881	195,374	97,687	534,405	293,061				
Event Precip (inches)	0.32	0.34	0.17	0.93	0.51				
Inches per year =	33,1	Per USBR AgriMet Station RTHI for calendar year.							

Event Pollutant Discharge (lbs)						
	4th Avenue Outfall					
Sample Date	3/12/12	4/4/12	5/2/12	7/15/12	10/15/12	
TSS	319.17	130.43	24.4 6	330.01	293.47	
TP	0.41	0.22	0.07	1.16	0.52	
Lead	0.02	ND	ND	ND	ND	
TN	1.92	4.73	2.28	5.31	2.41	
Zinc	0.35	0.21	0.04	0.34	0.83	
Hardness	100.66	59.67	16.14	70.02	45.98	
PCBs	ND	ND	ND	ND	ND	
Discharge Volume (gallons)	183,881	195,374	97,687	534,405	293,061	
Event Precip (inches)	0.32	0.34	0.17	0.93	0.51	
Inches per year =	33.1	Per USBR AgriMet Station RTHI for calendar year				
Estimated Load/Ir	nch Precip (lbs/	inch)				
•	4th Avenue C					
Sample Date	3/12/12	4/4/12	5/2/12	7/15/12	10/15/12	
TSS	997.4173	383.6220	143.8583	354.8504	575.4330	
TP	1.2755	0.6570	0.4268	1.2516	1.0214	
Lead	0.0767	ND	ND	ND	ND	
TN	5.9941	13.9063	13.4268	5.7064	4.7186	
Zinc	1.1029	0.6234	0.2398	0.3692	1.6304	
Hardness	314.6	175.5	94.9	75.3	90.2	
PCBs	ND	ND	ND	ND	ND	
Disch Vol (gals.)	183,881	195,374	97,687	534,405	293,061	

2012 Stormwater/Events Data Files/Water Quality Data Centennial Trail Outfall

	PQL	Method
TSS, mg/L	1	SM2540
TP, mg/L	0.025	EPA365.3
Lead, mg/L	0.01	SM3120
	A	SM 4500N
TN, mg/L	0.08	B/4110
Zinc, mg/L	0.013	SM3120
Hardness, mg/L	0.2	SM2340
PCBs, ug/L	0.2	EPA 808 2

Concentration						
	Centennial Trail Outfall					
Sample Date	3 / 12/12	4/4/12	5/2/12	7/15/12	10/15/12	
TSS, mg/L	304	75	134	378	120	
TP, mg/L	0.33	0.13	0.16	0.65	0.21	
Lead, mg/L	0.020	ND	ND	0.021	ND	
TN, mg/L	1,66	2.80	3.80	1.86	0.98	
Zinc, mg/L	0.56	0.15	0.25	1.23	0.34	
Hardness, mg/L	135.00	26.00	20.20	34.20	18.80	
PCBs, ug/L	ND	ND	ND	ND	ND	
Discharge	,					
Volume (cubic						
feet)	8,651	9,191	4,596	25,141	13,787	
Discharge						
Volume (gallons)	64,707	68,751	34,376	188,055	103,127	
Event Precip						
(inches)	0.32	0.34	0.17	0.93	0.51	
Inches per year						
=	33.1	Per USBR AgriMet Station RTHI for calendar year.				

Event Pollutant Discharge (lbs)						
	Centennia Outfall	Centennial Trail Outfall				
Sample Date	3/12/12	4/4/12	5/2/12	7/15/12	10/15/12	
TSS	164.15	43.03	38.44	593.20	103.27	
TP	0.18	0.07	0.05	1.02	0.18	
Lead	0.01	ND	ND	0.00	ND	
TN	0.90	1.61	1.09	2.92	0.85	
Zinc	0.30	0.09	0.07	1.93	0.29	
Hardness	72.90	14.92	5.79	53.67	16.18	
PCBs	ND	ND	ND	ND	ND	
Discharge Volume (gallons)	64,707	68,751	34,376	188,055	103,127	
Event Precip (inches)	0.32	0.34	0.17	0.93	0.51	
Inches per year =	33.1	Per USBR AgriMet Station RTHI for calendar year				

Estimated Load/Inch Preci (lbs/inch)	p				
	Centennial Trail Outfall				
Sample Date	3/12/12	4/4/12	5/2/12	7/15/12	10/15/12
A THE RESIDENCE OF THE PARTY OF	512.980				
TŞS	8	126.5578	226.1165	637.8511	202.4924
TP	0.5569	0.2143	0.2734	1.1002	0.3594
Lead	0.0337	ND	ND	0.0047	ND
TN	2,8011	4.7248	6.4123	3.1386	1.6604
Zinc	0.9450	0.2531	0.4219	2.0755	0.5737
	227.804				
Hardness	0	43.8734	34.0862	57.7103	31.7238
PCBs	ND	ND	ND	ND	ND
Disch Vol (gals.)	64,707	68,751	34,376	188,055	103,127

2012 Average Annual Load, lbs/day*					
	4th	Centennial	Total		
TSS	44.53	27.27	71.80		
ТР	0.08	0.04	0.12		
Lead	0.00	0.00	0.0021		
TN	0.79	0.31	1.10		
Zinc	0.07	0.07	0.14		
Hardness	13.61	6.59	20.20		
PCBs	ND	ND	ND		
*Estimate only, subject to errors and assumptions.					

2012 Average Annual Load, lbs/year*					
		4th	Centennial	Total	
TSS		16,253	9,953	26,207	
ТР		30.7	14.2	44.9	
Lead		0.51	0.25	0.76	
TN		289.6	113.0	402.7	
Zinc		26.3	24.5	50.7	
Hardness		4968	2406	7374	
PCBs		ND	ND	ND	

^{*}Estimate only, subject to errors and assumptions.

APPENDIX - E

SUMMARY OF INSPECTIONS AND ENFORCEMENT ACTIONS

In 2012, there was one (1) construction project in the City of Post Falls that disturbed more than one acre and had the potential to discharge to the MS4 system. This project was the Blue Dog RV dealership located at 714 W. Seltice Way. The City required the project to apply for coverage under the Idaho Construction General Permit. The City verified that the project owner filed a Notice of Intent on the e-NOI system and had a storm water management plan on-site. Storm water technician, Adam Tate, inspected the project on March 29, 2012, April 26, 2012, May 21, 2012 and June 28, 2012. The June 28, 2012, inspection resulted in a verbal order for the contractor to maintain the silt fence until final stabilization. Stabilization of project soils with pavement and grass was completed in July 2012.

APPENDIX - F

SUMMARY OF ENFORCEMENT ACTIONS RECEIVED

The City received a Notice of Violation (NOV) letter from EPA Region X on March 14, 2012. The City replied to the NOV on April 14 and April 19, 2012. There have been no other enforcement actions received by the City.

The NOV generally requested that additional information be reported to EPA each year and that more information be provided for public access on the City's website. EPA's requests were fulfilled in the above mentioned letters which are included in this Appendix.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 900 Seattle, Washington 98101-3140

MAR 1 4 2012

OFFICE OF COMPLIANCE AND ENFORCEMENT

Reply To: OCE-133

CERTIFIED MAIL -7011 0470 0002 9128 0440 RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION and INFORMATION REQUEST

Terry Werner
Director
Department of Public Services
City of Post Falls
2002 West Seltice Way
Post Falls, Idaho 83854

Re: City of Post Falls Municipal Separate Storm Sewer System (MS4) Compliance Inspection

Dear Mr. Werner:

On September 14, 2011, the U.S. Environmental Protection Agency Region 10 (EPA) conducted an inspection of the City of Post Falls' (City) Phase II Municipal Separate Storm Sewer System (MS4), including the City's storm water management program (SWMP), to evaluate compliance with its National Pollutant Discharge Elimination System (NPDES) Permit, Permit Number IDS-028231 (Permit). It is unfortunate that despite EPA announcing the inspection, the City did not ensure the appropriate staff were present at the time of inspection. EPA inspectors had several areas of inquiry which City representatives at the inspection were unable to answer, but could have been answered if the official stormwater representative, Mike Neher, had been present. In the future, it is strongly recommended that the appropriate staff be present for the inspection.

The Permit establishes minimum requirements for an MS4 SWMP to address the water quality impacts from stormwater and allowable non-stormwater discharges. The inspection included a review of documents, interviews with City program managers and staff, and field verification inspections. A review of the inspection report and available files revealed the following violations:

VIOLATIONS

1. Per Part II.B.1.a of the Permit, within two years of the effective date of the Permit, the City is required to develop and implement a public education program to educate the community about the impacts of stormwater discharges on local waterbodies and the steps that the community can take to reduce pollutants in stormwater runoff. Part II.B.1.b of the Permit requires the City to

distribute appropriate stormwater educational materials to the target audiences at least once per year. Furthermore, per Part II.B.3.e of the Permit, within two years from the effective date of the Permit, the permittee must begin an ongoing education program to inform users of the system, especially public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. The City provided very little information in the Annual Report regarding its stormwater education program. Further, it was unknown if the City had developed and implemented a public education program within the two year deadline. At the time of inspection, EPA discovered the City targeted an audience of grade school students with regard to such things as the Illicit Discharge Detection and Elimination (IDDE) program. According to the City, the City's target audience is grade school students who attend the wastewater treatment plant tours in hope that the students will pass the information to their parents. The City's outreach program is limited to giving students a tour of the wastewater treatment plant. The scope and audience is inadequate. The City has not made efforts to target those businesses and residences that discharge to the City's major outfalls. Therefore, the City is in violation of Part II.B.1.a, Part II.B.1.b, and Part II.B.3.e of the Permit. For example, the City could have made an effort to target stormwater education efforts to the residents of the approximately four block area served by the storm sewer system of the Ponderosa Outfall, or businesses (e.g., drycleaners that might dump excess process fluids to storm drains, restaurants that might hose off their kitchen mats to storm drains, etc.) along the streets served by the storm sewer systems of the 4th Avenue and Spokane Street Outfalls.

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- 2. Per Part II.B.1.c of the Permit, the City must prepare and distribute appropriate information relevant to the SWMP to the local newspaper and at least one media outlet. There was no information regarding what information was distributed to at least one other media outlet. This is a violation of Part II.B.1.c of the Permit. In addition, during the inspection interview, EPA inquired if the City's press release (provided in the Annual Report) was published by the newspaper in an article or an announcement. The City indicated that an article included in the newspaper was not specific to the City and generally described the Best Management Practices (BMP) Demo Day sponsored by Panhandle Sediment and Erosion Education Program's (SEEP). Although the City has no control over newspaper content, EPA recommends the City's press release be tailored to the City's stormwater activities.
- 3. Per Part II.B.2.b of the Permit, within two years of the effective date of the Permit, the City must make all SWMP documentation and Annual Reports available online through its regularly maintained website. On August 22, 2011, EPA noted that only the 2010 Annual Report was posted via the "Storm Water Report" link on the City's website (http://www.postfallsidaho.org/psstormwater.html). The City's SWMP, however, was not posted on the City's website; therefore, the City has violated Part II.B.2.b of the Permit.
- 4. Per Part II.B.3.d of the Permit, within two years of the effective date of the Permit, the City must submit to EPA a copy of the completed comprehensive MS4 map(s), as both a report and as an electronic file via ARC GIS format. The map was required to be submitted as part of the City's 2010 Annual Report. However, the City failed to submit the map in the 2010 Annual Report. Only upon request via the pre-inspection questionnaire was a copy of the map provided. This is a violation of Part II.B.3.d of the Permit.

- 5. Per Part II.C.3 of the Permit, within one year of the effective date of the Permit, the City's Annual Report must include a description of how the activities noted in Part II.B will be targeted by the City to control the discharge of pollutants of concern. There was no information in the Annual Report regarding this requirement. This is a violation of Part II.C.3 of the Permit.
- 6. Per Part IV.A.2 of the Permit, the City must develop and conduct a monitoring program to assess the effectiveness and adequacy of control measures implemented through this Permit and must identify and prioritize those portions of the MS4 requiring additional controls. Per Part IV.A.5 of the Permit, within 18 months of the effective date of the Permit, the City must implement a stormwater discharge monitoring program. On August 12, 2009, the City commenced monitoring in advance of the Permit deadline. The City officials did not assess the effectiveness and adequacy of control measures. The City developed a monitoring program pursuant to Part IV.A.2 of the Permit. The City's program states that, "Where issues needing corrective action are discovered, they will be documented and an appropriate course of action determined." Results from stormwater monitoring of the "Centennial" Outfall indicated levels of 545 mg/L, 328 mg/L and 960 mg/L of total suspended solids (TSS) for March, May and August 2010, respectively. While the Permit does not specifically identify discharge limitations, EPA believes the City should assess whether the current control measures are effective for TSS. Monitoring results for the "4th Avenue" Outfall reported temperatures of 71° and 64° F for August 11, 2010, and September 16, 2010, respectively. Temperature results for the "Centennial Trail" Outfall reported 66° and 62° F for August 11, 2010, and September 16, 2010, respectively. The weather on August 11, 2010, was sunny with a high of 80° F, and on September 16, 2010, it was rainy with a high of 71° F¹. While such temperatures may seem normal for discharges from a wastewater treatment plant, they are considered elevated for stormwater discharges and could imply that the discharges are not stormwater only. The City officials indicated in the closeout meeting that the monitoring results were considered to be normal and as a result did not require them to assess control measures. In the Annual Report and in the responses to the pre-inspection questionnaire, the City failed to inform EPA and the public as to why the monitoring results of the sampled results are not a concern for them. Failure to assess the effectiveness and adequacy of control measures is a violation of Part IV.A.2 of the Permit.

INFORMATION REQUESTED

The request for information in this letter is made under the authority of Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318. Within thirty (30) days of receipt of this letter, please identify what steps you have taken to address <u>each</u> of the violations noted above and to ensure compliance with the CWA and stormwater regulations, including the following:

a. For Violation #1, specify the plans and activities (for example, holding household hazardous collection events) the City intends on conducting to target stormwater education efforts to the residents, businesses and other dischargers to the MS4, particularly to residents of the approximately four block area served by the storm sewer system of the Ponderosa Outfall; and to businesses, residents and other users along the streets served by the storm sewer systems of the 4th Avenue and Spokane Street Outfalls.

¹ http://www.wunderground.com/history/airport/KSFF/2010/8/11/MonthlyHistory.html?req_city=NA&req_state=NA&req_statename=NA and http://www.wunderground.com/history/airport/KSFF/2010/9/11/MonthlyHistory.html#calendar

- b. For Violation #3, the City must update its stormwater website to include the SWMP. Submit information to EPA showing that the City's website has been updated.
- c. For Violation #5, a description of how the activities noted in Part II.B of the Permit will be targeted by the City to control the discharge of pollutants of concern, specifically TSS and temperature.
- d. For Violation #6, a narrative on how you assessed the effectiveness and adequacy of control measures implemented per the requirements of the Permit.

Please submit your response to:

Julie Congdon
NPDES Compliance Unit
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900 (M\S OCE-133)
Seattle, WA 98101

In accordance with the provisions of 40 C.F.R. § 2.203, you may assert a business confidentiality claim covering part or all of the information submitted by clearly identifying it as "confidential." If no such claim accompanies the information when it is received by the EPA, it may be made available to the public without further notice.

We urge you to take the steps necessary to address these concerns and to ensure that all other aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If subsequent inspections find that these concerns have not been addressed, formal enforcement actions, including penalties, may be assessed.

Please do not hesitate to contact us with any questions regarding this letter or other matters related to your compliance with the CWA. If you have any questions concerning this matter, please contact Julie Congdon, Compliance Officer, at (206) 553-2752.

Sincerely

Edward J. Kowalsk

Director

cc: Curt Fransen

Director, Idaho Department of Environmental Quality

State Office



Public Services Department
Office of the Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 12, 2012

Julie Congdon
NPDES Compliance Unit
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900 (M\S OCD-133)
Seattle, WA 98101

Re: Notice of Violation and Information Request, City of Post Falls MS4

Dear Ms. Congdon:

This letter is in reply to EPA's Notice of Violation (NOV) dated March 14, 2012, which we received on March 20, 2012.

We appreciate EPA bringing to our attention deficiencies in the Municipal Separate Storm Sewer (MS4) program and we will do our best to respond to each of the concerns noted in the referenced notice. After reviewing the NOV letter, the MS4 permit, our records and the websites of other MS4 entities, the City has a better understanding of EPA's objectives. It appears that most of EPA's concerns relate to the need for readily available information to EPA and the public. As indicated in the detailed responses below, the City will provide more information about the Management Program (SWMP) on the City's public access website.

We would also like to provide EPA with the following background information about the Post Falls storm water management system and the surrounding area. This information will help put in perspective the significant capital and institutional improvements the City has made over many years (before and after the MS4 permit was issued) to prevent the discharge of storm water to the Spokane River.

BACKGROUND INFORMATION

The Post Falls Storm Water Management System

The City of Post Falls (population 27,574 US Census) is situated adjacent to and north of the Spokane River within nine miles of the Idaho-Washington border in a semi-rural region. The annual average precipitation is 26 inches. The soils in the area are mapped as Garrison gravelly silt loam, with relatively high permeability. The gravelly soils are remnants of pre-historic floods from ice dams repeatedly forming and melting, causing the massive release of water stored in

glacial Lake Missoula. The glacial floods filled the valley with boulders, gravel and sand. As a result, very little runoff occurs from the area's permeable land surfaces.

This natural condition has made it possible for the City's storm water management system to extensively rely on bio-filtration systems (grassed swales) which treat and infiltrate runoff into the soils.

The total area within the City limits is about 9,600 acres, of which 70% is permeable surface area. The other 30 percent (2,994 acres) is impervious surface area (pavement and roof tops) that contribute to runoff. Ninety-nine percent (99%) of runoff is captured and treated by the City's zero-discharge storm water management system of swales and drywells. Only one percent (28.6 acres) of the impervious surface area contributes runoff to the MS4 system, which in turn discharges to the Spokane River.

All new development projects are required to handle on-site runoff with grassed swales or equivalent means of on-site disposal.

The MS4 system has two surface water discharge points and both are monitored under the MS4 NPDES discharge permit. These discharge points are called the Centennial Trail and 4th Avenue outfalls.

There are three isolated locations served by storm drains that do not have outfalls to the river and are not part of the MS4 system. They receive runoff from small, localized residential areas. They are:

- > Spokane Street storm drain which discharges to a grassed swale.
- ➤ Ponderosa Boulevard culvert which discharges onto private property outside of the City limits in a heavily wooded area where the water soaks into the ground. The distance from the culvert to the river is more than 700 feet.
- ➤ Polites Park culvert which discharges onto City property and private property in a heavily wooded area where the water soaks into the ground. The distance from the culvert to the river is more than 1,200 feet.

The Spokane River

At Post Falls, the Spokane River average flow rate is 5,549 cubic feet per second, or 1.3 trillion (1.3x10¹²) gallons per year (2000 to 2010, USGS). The average total suspended solids (TSS) concentration in the river at Lake Coeur d'Alene outlet is 1.9 mg/L (USGS, 2005-2010). As a result, the average TSS load in the river above Post Falls is 21 million pounds per year.

The Post Falls MS4 discharges about 20 million gallons of storm water per year (28.6 acres surface area x 26 inches precipitation). This equates to one gallon of storm water to every 65,000 gallons of river water. From the momitoring data, the average annual TSS load for 2010 and 2011 from the MS4 is estimated at 28 thousand pounds per year. The average annual increase in river TSS concentration due to the Post Falls MS4 discharge is 2.5 parts per billion. This is an undetectable and insignificant amount. The 1 mg/L detection limit for TSS is 400 times greater than the calculated increase in the river TSS concentration.

RESPONSE TO NOV

The following information is provided in sequence with the issues enumerated in the referenced EPA letter. We first quote EPA's key concern and follow with an explanation of what actions the City has taken and/or will take to resolve the issue.

1. (Part II.B.1.). EPA states "The City's outreach program is limited to giving students a tour of the wastewater treatment plant."

Response: During the field audit, EPA asked what was done for outreach. The City used the student tours as just one example of outreach conducted. The City has provided the following outreach efforts:

- > Tours of the treatment plant to at least 300 students, teachers and local business leaders every year. During the tours, the City distributes an informational packet to each participant containing a number of brochures about water quality and storm water. EPA representatives also received this packet during their field audit in September 2011.
- Participate in annual informational "open houses" in cooperation with the City of Coeur d'Alene, highway districts and other interested agencies; information about water quality protection, including the City's storm water system and wastewater treatment is provided. EPA representatives also received copies of this information during their field audit in September 2011.
- Distribute the locally produced Storm Water Erosion and Sediment Control Field Guides to the public visiting the City's development services desk.
- Distribute notices concerning the Construction General Permit (CGP) to the public when they obtain permits at City Hall.
- > Provide informational articles to the local paper per the permit.
- ➤ Broadcast a public service announcement concerning storm water erosion on Cable TV Channel 13. It currently runs 3 times per week: 8 a.m. Sunday, 10:30 a.m. Tuesday and 9:00 p.m. Friday.
- ➤ Continually post on the City's storm water website an informational brochure about grassed swales, the current annual storm water report including newly developed SWMP elements, the aforementioned field guide, storm water management program contact information, the MS4 map, and the pertinent city code.
- 2. (Part II.B.1.c). EPA states "There was no information regarding what information was distributed to at least one other media outlet."

Response: The permit deadline for starting the submittal of relevant information to the media outlets was December 31, 2010. Our first annual submittal to the local paper was on October 26, 2010. Even though the paper chose not to publish the article, the City met its permit obligation to submit an article. Our second annual submittal was on November 4, 2011 and it was subsequently published on November 7, 2011. Copies of the submittals were included in the annual reports.

A public service announcement (PSA), professionally produced on behalf of Panhandle Area Council http://www.pacni.org/, was repeatedly broadcast on City Cable TV 13 beginning in February 2010. In early 2011 the PSA was inadvertently dropped from programming but has been reinstated as of March 26, 2012 and runs three times per week at 8 a.m. Sunday, 10:30 a.m. Tuesday and 9 p.m. Friday. The PSA runs for eight minutes and provides a good overview of erosion, causes, water quality impacts and best management practices for controlling or preventing erosion on construction sites and developments. Panhandle Area Council sponsors the Stormwater and Erosion Education Program which provides classroom and hands-on training to area contractors and government representatives.

Another media outlet is the City's website. On that website, a number of informational items have been continuously available to the public, including an informational brochure about grassed swales, the current annual storm water report including newly developed SWMP elements, the aforementioned field guide, storm water management program contact information, the MS4 map, and the pertinent city code.

3. (Part II.B.2.b). EPA states "The City's SWMP, however, was not posted on the City's website..."

Response: The City believed it was posting SWMP elements on the City's website as required by permit. Until now, our understanding of the permit requirement was as follows. The SWMP consists of all of the elements enumerated in Section II of the permit. Each element was developed according to the schedule in Section III, *Management Program - Schedule of Implementation and Compliance*. Each completed element was submitted in the annual reports to EPA and IDEQ and each annual report was posted on the City's website in accordance with Section IV.C.2. until replaced by the next year's report. Therefore all of the elements of the SWMP have been posted on the website. When we received the NOV, we checked the websites of other MS4 entities to see what they had posted. The majority of them posted their fully compiled SWMP documents, so we apparently misunderstood the permit requirement. We will post the compiled SWMP in its entirety for the duration of the permit on the City's website. If this is not satisfactory to EPA, please clarify what is required.

4. (Part II.B.3.d). EPA states "...the City must submit to EPA a copy of the completed comprehensive MS4 map(s), as both a report and as an electronic file via ARC GIS format. The City failed to submit the map in the 2010 Annual Report. Only upon request via the pre-inspection questionnaire was a copy of the map provided."

Response: The City concurs that the map was not submitted in ArcGIS format. The map was submitted to EPA with the first annual report, dated January 8, 2010, in both 25"x 36" paper format and in electronic (PDF) format on a compact disc (CD). The hard copy map was again submitted to EPA with the second (2010) Annual Report dated January 10, 2011. The electronic copy of the map was again submitted to EPA via email on August 12, 2011. The map is also posted on the City's website at http://www.postfallsidaho.org/PZDept/Maps/StormwaterMS4Map.pdf

Until recently, the City has relied on computer assisted drafting (CAD) programs for all of its street and utility mapping, including the MS4. In the last year, the City began the migration from CAD mapping to ArcGIS. We have accelerated the mapping of the MS4 system in ArcGIS and an electronic file copy on CD is provided herewith.

5. (Part II.C.3) EPA states "...within one year of the effective date of the Permit, City's Annual Report must include a description of how the activities noted in Part II.B will be targeted by the City...There was no information in the Annual Report regarding this requirement."

Response: The City regrets having overlooked this requirement. The report is provided herewith.

6. (Part IV.A.2) EPA states "In the Annual Report and in the responses to the preinspection questionnaire, the City failed to inform EPA and the public as to why the monitoring results of the sampled results are not a concern to them. Failure to assess the effectiveness and adequacy of control measures is a violation of Part IV.A.2."

Response: The City regrets having overlooked this requirement. The IV.A.2 assessment is provided herewith.

RESPONSE TO INFORMATION REQUEST

Request

EPA's request for information is reproduced below, and the City's response follows it:

The request for information in this letter is made under the authority of Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318. Within thirty (30) days of receipt of this letter, please identify what steps you have taken to address <u>each</u> of the violations noted above and to ensure compliance with the CWA and stormwater regulations, including the following:

- a. For Violation #1, specify the plans and activities (for example, holding household hazardous collection events) the City intends on conducting to target stormwater education efforts to the residents, businesses and other dischargers to the MS4, particularly to residents of the approximately four block area served by the storm sewer system of the Ponderosa Outfall; and to businesses, residents and other users along the streets served by the storm sewer systems of the 4th Avenue and Spokane Street Outfalls.
- b. For Violation #3, the City must update its stormwater website to include the SWMP. Submit information to EPA showing that the City's website has been updated.
- c. For Violation #5, a description of how the activities noted in Part II.B of the Permit will be targeted by the City to control the discharge of pollutants of concern, specifically TSS and temperature.
- d. For Violation #6, a narrative on how you assessed the effectiveness and adequacy of control measures implemented per the requirements of the Permit.

Response

a. (Violation #1) EPA indicates concern about the Ponderosa Boulevard culvert. As indicated in the background information above, the Ponderosa Boulevard culvert does not discharge to the river and is not part of the MS4 system. We regret any confusion in this matter. In regards to the parts of town that are served by the MS4, the City plans to continue its on-going educational efforts enumerated below.

In addition for 2012, the City is partnering with the City of Coeur d'Alene and the Kootenai County Aquifer Protection District to produce a direct mail brochure to every residential and commercial utility customer of the City (approximately 9,000 accounts) this spring. Another 500 copies will be distributed at the upcoming county Business Fair. A copy of the brochure is included herein. The brochure was the idea of the City's Storm water Technician who saw a practical need to educate residents and businesses about the City's storm water management system. We then promoted the brochure to the City of Coeur d'Alene who agreed to participate and the Aquifer Protection District who agreed to fund the project with a budget of twelve thousand dollars for both cities.

The City's continuing outreach efforts include:

- > Tours of the treatment plant to students, teachers and local business leaders.

 During the tours, the City distributes an informational packet to each participant containing a number of brochures about water quality and storm water.
- ➤ Participate in informational "open houses" in cooperation with other storm water agencies, highway districts and other interested agencies; information about water quality protection, including the City's storm water system is provided.

- Distribute the Storm Water Erosion and Sediment Control Field Guides to the public visiting the City's development services desk.
- ➤ Distribute notices concerning the CGP to developers and contractors when they obtain permits at City Hall.
- > Provide informational articles to the local paper.
- ➤ Post a public service announcement concerning storm water erosion on Cable TV Channel 13. It currently runs 3 times per week.
- ➤ Continually post on the City's storm water website an informational brochure about grassed swales, the annual storm water report, the aforementioned field guide, storm water management program contact information, the MS4 map, and the pertinent city code.
- New item: Continually post on the City's storm water website the compiled storm water management plan, all of the annual reports and other educational materials.
- b. (Violation #3) The City agrees to augment its website with the compiled SWMP documents. Please visit this site for verification:

 http://www.postfallsidaho.org/ then click on "Quick Links", select "Storm Water" and click "Go!"
- c. (Violation #5) Please see the enclosed report entitled, "Part II.B Implementation Report."
- d. (Violation #6) The City regrets having overlooked this requirement. Please find enclosed the Part IV.A.2. Assessment Report.

In summary, we appreciate EPA bringing to our attention deficiencies in our MS4 program and we hope EPA finds our responses to be satisfactory. If you need additional information or have any questions about the information provided herein, please do not hesitate to contact Mike Neher, Environmental Manager, or me at 208-777-9857.

Sincerely,

Jerushleson Terry Werner

Director of Public Services

c: Mike Neher, Environmental Manager
Dick Froehlich, Chief Wastewater Operator
Daniel Redline, IDEQ

Enclosures: Part II.B Implementation Report

Part IV.A.2 Assessment Report

ArcGIS MS4 Map

ArcGIS MS4 electronic file Public Education Brochure

EPA Request for Information Violation #5

Part II.B. Implementation Report

In the March 14, 2012 letter regarding violation #5, EPA cites Part II.C.3 of the Permit and states: "...the City's Annual Report must include a description of how the activities noted in Part II.B will be targeted by the City to control the discharge of pollutants of concern. There was no information in the Annual Report regarding this requirement. This is a violation of Part II.C.3 of the Permit."

In the same letter under Information Requested, section c, EPA asks the City to provide "For Violation #5, a description of how the activities noted in Part II.B of the Permit will be targeted by the City to control the discharge of pollutants of concern, specifically TSS and temperature."

Permit Part II. C.3. states:

"Within one year from the effective date of this permit, the permittee's Annual Report must include a description of how the activities in each of the minimum control measures in Part II. B will be targeted by the permittee to control the discharge of pollutants of concern, and ensure to the maximum extent practicable that the MS4 discharges will not cause an in-stream violation of the applicable water quality standards. This discussion must specifically identify how the permittee will evaluate and measure the effectiveness of the SWMP to control the discharge of the pollutant(s) of concern. The permittee must submit this section of the SWMP to EPA and IDEQ as part of the first Annual Report required in Part IV. C, and update it as necessary in subsequent Annual Reports."

In response to Part II.C.3, the City will implement the required activities of Part II.B, Minimum Control Measures, over the course of the permit term as stated in the SWMP. The bottom line effectiveness of the SWMP is measured by storm water monitoring data accumulated over the course of the permit. Storm water monitoring data will be used in an assessment of the effectiveness of the Minimum Control Measures to ensure to the maximum extent practicable that the MS4 discharges will not cause an in-stream violation of the applicable water quality standards. A minimum of three years of data are needed to develop meaningful water quality trends. The first monitoring year is 2010, and the last monitoring year under the permit is 2014. The 2012 Annual Report will include an assessment of the first three years of data, and each Annual Report thereafter will include each successive year's data in the assessment. The assessment will include:

- A statement of existing water quality standards for the appropriate reach of the Spokane River (HUC basin 17010305).
- A summary of existing historic water quality data for the appropriate reach of the Spokane River.
- A comparison of upstream water quality to the water quality standards.
- A calculation of the MS4, river and in-stream (mixed) concentration-based loads of the pollutants of concern.
- A comparison of the calculated in-stream concentration-based loads of the pollutants of concern to the water quality standards.

• An evaluation of the overall effectiveness of the SWMP to not cause an in-stream violation of the applicable water quality standards.

The activities of Part II.B will be focused on all of the pollutants of concern, and in particular TSS with which many pollutants are associated. Since stormwater discharged to the MS4 is runoff from streets, parking lots and roof tops, the primary sources of pollutants of concern are road debris and dirt, tire dust, and automotive fluids. The temperature of storm water is affected by the transfer of heat between the storm water and the air, pavement, ground and conveyance facilities. The City has conducted an illicit discharge survey and found no industrial or commercial discharges to the MS4. Therefore storm water temperature in the MS4 is not affected by other than natural conditions and the temperature of landscape irrigation runoff. Ninety-nine percent of runoff in the City is captured and treated by grassed swales. The remaining 1% goes to the MS4 system, located along Spokane Street, Mullan and 4th Avenue. Even though only a small portion of storm water in the city is discharged to the MS4 system, it is important to conduct a general outreach program to maintain public awareness of potential water quality impacts to surface water and ground water. Each of the Part II.B activities will apply to either the general public or properties adjacent to the MS4 system, as indicated in the following table:

Control Measure	General Public	MS4 Adjacent Properties
Public Education and Outreach	X	· X
Public Involvement/Participation	X	X
Illicit Discharge Detection and Elimination	,	X
Construction Site Storm Water Runoff Control		X
Post Construction Storm Water Management in New Development and Redevelopment		X
Pollution Prevention and Good Housekeeping for Municipal Operations	,	X

EPA Request for Information Violation #6

Part IV.A.2 Assessment Report

In the March 14, 2012 letter regarding violation #6, EPA cites Part IV.A.2 of the Permit and states: "Failure to assess the effectiveness and adequacy of control measures is a Violation of Part IV.A.2 of the Permit."

In the same letter under Information Requested, section d, EPA asks the City to provide "For Violation #6, a narrative on how you assessed the effectiveness and adequacy of control measures implemented per requirements of the Permit."

Permit Part IV.A.2, Monitoring Objectives, states:

"The permittee must monitor the quality of the storm water discharges from the MS4 as described in Part IV.5. Not later than 12 months from the effective date of this permit, the permittee must develop a monitoring plan that includes the quality assurance requirements defined in Part IV.A.6. The permittee must develop and conduct a monitoring program to:

- a) Estimate the pollutant loading currently discharged from the MS4s.
- b) Assess the effectiveness and adequacy of control measures implemented through the permit.
- c) Identify and prioritize those portions of the MS4 requiring additional controls.

In context with the rest of the Permit, the City understands the above Permit requirement to mean the City must develop a monitoring plan and conduct a monitoring program so that the City can reasonably:

- a) estimate the pollutant loadings discharged by the MS4,
- b) assess the effectiveness of control measures relative to the MS4's impact on the receiving waters, and
- c) identify and prioritized portions of the MS4 that need additional controls to ensure to the maximum extent practicable that the MS4 discharges will not cause an in-stream violation of the applicable water quality standards.

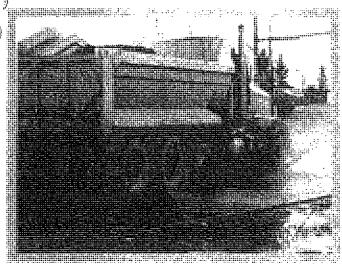
The City submitted the monitoring and quality assurance plan to EPA and IDEQ on March 23, 2009. We have revised it to add the following language to Section C.1 of the plan to reasonably assess the effectiveness of control measures relative to the MS4's impact on the receiving waters. A copy of the revised monitoring and quality assurance plan is provided herewith.

The bottom line effectiveness of the SWMP is measured by storm water monitoring data accumulated over the course of the permit. Storm water monitoring data will be used in an assessment of the effectiveness of the Minimum Control Measures to ensure to the maximum extent practicable that the MS4 discharges will not cause an in-stream violation of the applicable water quality standards. A minimum of three years of data are needed to develop meaningful water quality trends. The first monitoring year is 2010, and the last monitoring year under the permit is 2014. The 2012 Annual Report will include an assessment of the first three years of data, and

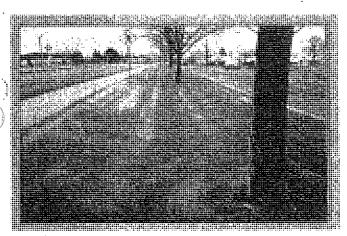
each Annual Report thereafter will include each successive year's data in the assessment. The assessment will include:

- A statement of existing water quality standards for the appropriate reach of the Spokane River (HUC basin 17010305).
- A summary of existing historic water quality data for the appropriate reach of the Spokane River.
- A comparison of upstream water quality to the water quality standards.
- A calculation of the MS4, river and in-stream (mixed) concentration-based loads of the pollutants of concern.
- A comparison of the calculated in-stream concentration-based loads of the pollutants of concern to the water quality standards.
- An evaluation of the overall effectiveness of the SWMP to not cause an instream violation of the applicable water quality standards.

As of this date, we have only two years of data. Multi-year trends cannot be discerned and a meaningful assessment of control measures' effectiveness cannot be made from the existing data. In each Annual Report, we have calculated and reported the estimated pollutant concentrations and loadings based on the quarterly monitoring data. In the next Annual Report (for 2012), an evaluation of the accumulated data from 2010 through 2012 will be made in accordance with the above amendment to the monitoring plan.



Plugged drywells can cause street flooding and hazardous conditions for motorists, bicyclists and pedestrians.



Grassy swales provide bio-filtration to help prevent pollutants in street runoff from getting into the groundwater.





Aquifer Protection
District

This brochure was made possible with funding by the Kootenai County Aquifer Protection District. For more information contact:

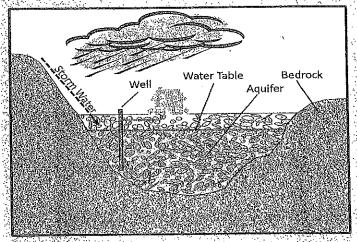
City of Post Falls Stormwater Program Post Falls, ID 83854 www.PostFallsIdaho.org Phone: 208-777-9857

The Problem

Protecting our water supply is everybody's business.
You can help by observing some simple rules:

- Keep curb cuts clear of debris and overgrown vegetation.
- Don't put soils, rock, trash, lawn debris or other wastes into the streets, gutters, storm drains, grassy swales or drywells.
- · Report polluters.

Water we use for drinking, bathing and landscaping comes from below the ground. Our source of drinking water is called the Rathdrum Prairie Aquifer, a vast supply of clean water. Water moves quickly through this aquifer because it has high porosity. That means there is ample space between the underground rocks and gravels for water to flow through. Because runoff and stormwater can readily flow into the aquifer, pollutants in runoff can also get into and contaminate the aquifer.



The Solution

To help prevent contamination of the aquifer (our source of drinking water) the municipalities of Kootenal County have designed stormwater management systems to keep water from flooding streets and property, and to protect the groundwater from contamination.

Special drainage and landscape features are included in the stormwater system to divert and filter runoff from streets, parking lots and roofs before it drains back into the aquifer:

-Street curbs and drains

-Curb cuis

-Grassy swales

-Dry wells

Gallians

Pollutants in runoff from roads and parking lots include pet waste, motor oil, gasoline, tire dust and fertilizer from landscaped areas. Disposal of household and industrial chemicals, anti-freeze, pesticides, paint, the dust and gasoline must not be put into swales, drywells, gutters or storm drains.

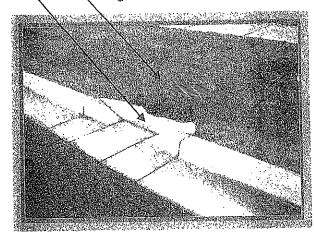
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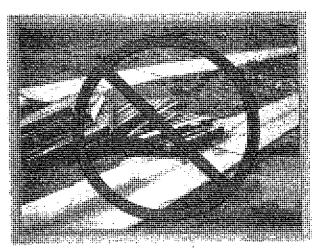
Violation of stormwater rules has serious legal consequences wincluding times and incarceration. National environmental laws require cities to control sources of pollulion that could contaminate lakes, streams and rivers. The U.S. Environmental Protection Agency (EPA) has issued stormwater discharge permits to the cities of Post Falls and Coerr d Alene and the highway districts. The stormwater pennits require the City to inform the public about stormwater pollution and to requiate consultation and industrial sites to keep pollution out of the streets, stoumed almage system and waterways, in turn the chies have: adopted regulations to require developers and properly owners to install and maintain stormwater management features. These features include sireet ourbs, massy swales, dry wells storm drains and storm sewers. For more information please centacts

> City of Post Falls Stormwater Program Coordinator Phone: 208-777-9857

 -Keep curb cuts and gutters free of overgrown grass and debris.

Keep swales and drywells free of debris. Polluting swales and drywells is against the law.





Report Solling to Water Dominist

City of Post Falls Stormwater Program 208-777-9857

Hazardous wastes disposed on the ground, streets or gutters can get in our drinking water, lakes and streams, harming aquatic life and public health. Household hazardous wastes may be disposed at the transfer station, 15580 W. Prairie Road. For more information visit: www.kcgov.us/departments/solidwaste/ or call 208-446-1420.

The second of the contract of



Public Services Department Water Reclamation Division

April 19, 2012

Julie Congdon
NPDES Compliance Unit
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900 (M\S OCD-133)
Seattle, WA 98101

Dear Ms Congdon:

We inadvertently did not include the enclosed QAP with our April 12, 2012, response to EPA's March 14, 2012, Notice of Violation. In our letter, the QAP is referenced in the response to Violation #6. The QAP is also posted on the City website as part of the SWMP. We also sent the QAP to you via email on April 18, 2012. If you have any questions or concerns, feel free to call me at 208-777-9857.

Sincerely,

Mike Neher

Environmental Manager

Enclosure: Monitoring and Quality Assurance Plan Rev. 4/3/12

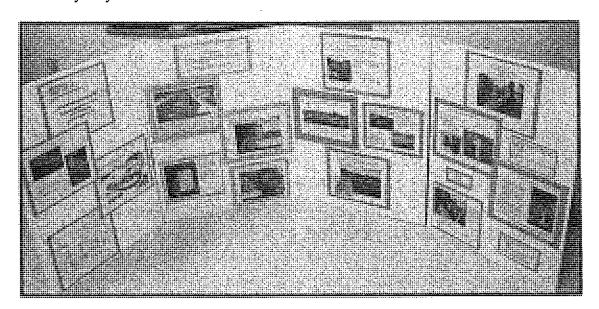
C: Terry Werner, Director of Public Services
Dick Froehlich, Chief Operator
Dan Redline, IDEQ

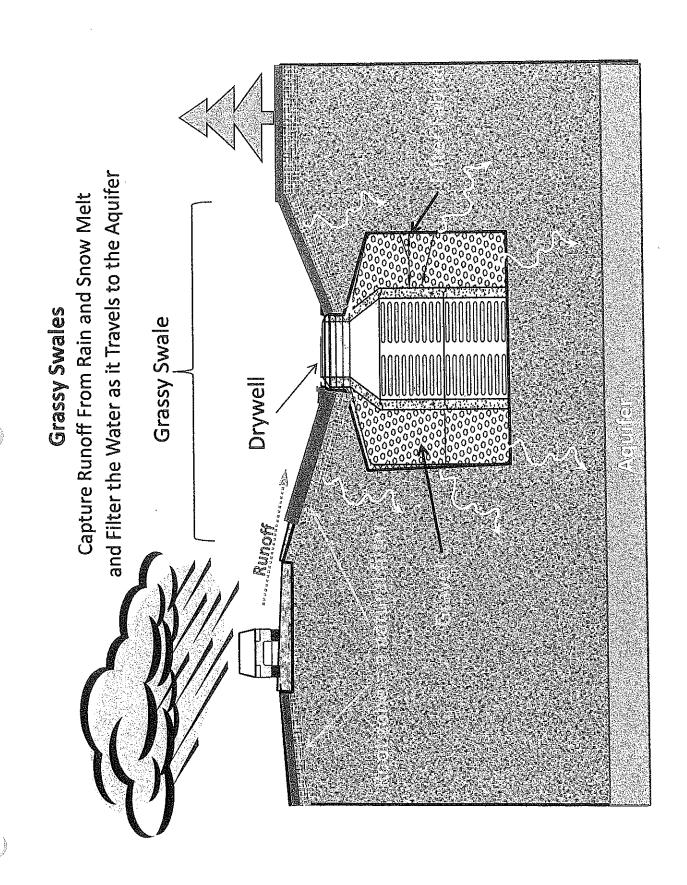
APPENDIX - G

COPIES OF PERMIT RELATED PRODUCTS

SCIENCE DAY at SILVERWOOD THEME PARK April 19, 2012

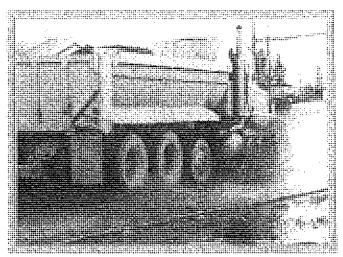
April 19, 2012
Poster Provided by City of Post Falls
Posted by City of Coeur d'Alene



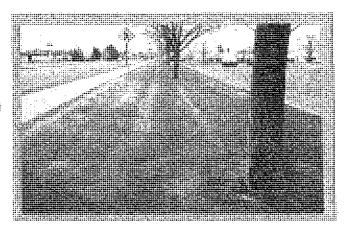


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Grassy swales provide bio-filtration to help prevent pollutants in street runoff from getting into the groundwater.





Aquifer Protection
District

illustato chiure was made possible with tunding by the Kootenai County Aquiter Protection District: Fo more information contact:

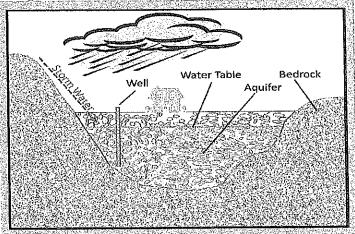
Chy of Rost Falls Stormwater Program Post Falls (b. 88854 www.Rost Falls Idaho.org Bhone: 202-777-9857

The Problem

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- Keep curb cuts clear of debris and overgrown yegetation.
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- Report polluters.

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-Street curbs and drains

-Curb cuts

-Grassy swales

-Dry wells

Protecting Our Water Supply

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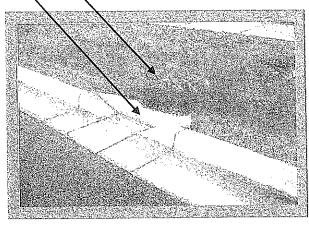
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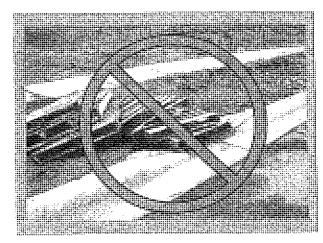
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Stormwater Program Coolidination Pliones 208*797* 9357

-Keep curb cuts and gutters free of overgrown grass and debris.

Keep swales and drywells free of debris. Polluting swales and drywells is against the law.





Report Spills or Illegal Dumping

City of Post Falls

Stormwater Program 208-777-9857

Hazardous wastes disposed on the ground, streets or guiters can get in our drinking water, lakes and streams, harming aquatic life and public health. Household hazardous wastes may be disposed at the transfer station, 15880 W. Prairie Read. For more information visit: www.kcgov.us/departments/solidwaste/

or call 208-448-1430.

THANK YOU FOR KEEPING OUR WATER SAFE



VALLI Information Systems, Inc.

915 Main Street, Suite 1000 Caldwell ID 83605 Phone 208.459.3611 Fax 208.459.3680 www.valii.com INVO GECEIVED

MAY 0 9 2012

BILLING DOCUMENT SPECIALISTS
a division of Valli information Systems, inc.
www.billingdoc.com

BY:

INVOICE #

76502

DATE

4/30/2012

Bill To

City of Post Falls Attn: Acounts Payable 408 North Spokane Street Post Falls,, ID 83854

NOTICE: We will no longer be Issuing billing statements to you unless you have a payment reminder or you request one.

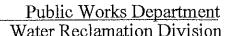
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1 1	Epay Monthly Maint Estatement Monthly Maint	1	BDS BDS		4/30/2012 4/30/2012	75.00 75.00

IF YOU WOULD LIKE TO RECEIVE
YOUR INVOICES VIA E-MAIL
PLEASE CONTACT US AT
(208) 459-3611 OR
QUALITYCONTROL@VALLI.COM

001-414.1445. 62170-\$3,282.95
A SERVICE CHARGE OF 1.75% PER MONTH RENDERED ON PAST DUE ACCOUNTS

001-414.1445.62190-\$1,960.70

Subtotal		\$6,937,89
The second of the second		4 17
Sales Tax (6.0%)	1	\$0.00
Total	i	\$6,937.89
Payments/Credits		\$0.00
Balance Due		\$6,937.89





August 30, 2012

Notice: Illicit Discharge Information

Dear Customer:

You have received this notice because your residence or place of business is adjacent to the City's storm sewer system, and we need to inform you about illicit discharges to the storm sewers. An illicit discharge is any discharge to the storm sewer system that is not composed entirely of storm water. Illicit discharges are prohibited by ordinance (Chapter 13.44.100) and subject to enforcement action (Chapter 13.44.120). Residents and businesses located near Spokane Street and the connecting side streets need to be especially aware that the street gutters and drains lead to the Spokane River via the storm sewer system.

Storm water pollution can end up in the Spokane River and could possibly harm aquatic life or violate Idaho water quality standards. Such violations could be costly to the City and the responsible party to correct.

The City's storm sewer system is a series of underground pipes that conveys storm water runoff in streets and gutters to a discharge pipe, or outfall, near the Spokane River. The City has two storm water outfall pipes and these are located near Falls Park at the west end of 4th Avenue. The outfalls discharge storm water run-off from Spokane Street and the streets that connect to it between 3rd and 16th Avenues.

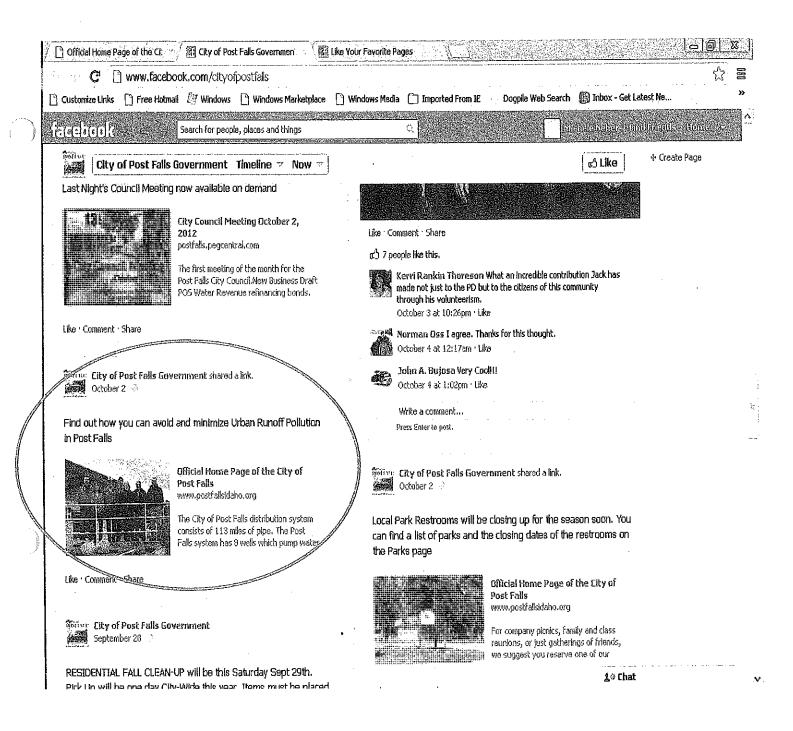
Please do not place or allow yard clippings, leaves, gas, oil, paints, antifreeze, fertilizer, sediment, mud or any other chemical or debris into the streets and gutters since this material will get into the storm sewer and the river. Your help in preventing storm water pollution is very much appreciated.

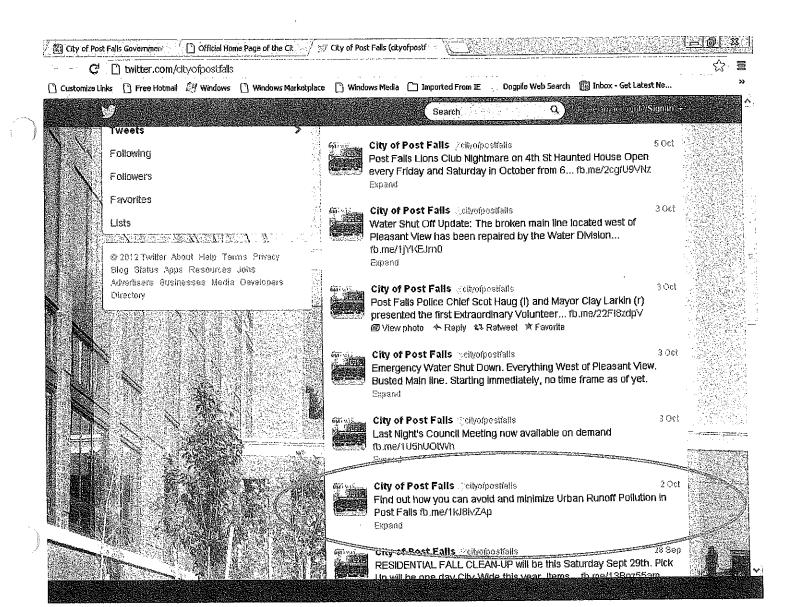
If you have any questions or would like additional information, feel free to call the Storm Water Program at 208-777-9857, or click on "Storm Water" in the "Quicklinks" menu on the City's website: postfallsidaho.org

Sincerely,

Mike Neher Environmental Manager

	MS4 MAINTENANCE - 2012
DATE	DESCRIPTION OF WORK
02/21/12	Inspected 4th St. and Centennial trail outfall
02/12/12	Talked to Blue Dog about felt over catch basin under train trestle on Seltice
02/13/12	Collected storm water samples at 4th St. and Centennial trail outfalls
03/14/12	Seep training
03/15/12	Seep training
03/19/12	Cleaned catch basins 101 and 102
03/27/12	GPSed manholes and Catch basins in the MS4
03/28/12	GPSed manholes and Catch basins in the MS4
04/04/12	Collected storm water samples at 4th and Centennial trail
04/12/12	Used Vactor truck to clean Catch basins on Spokane 3rd to Seltice (13, 90, 97, 53, 54, 73, 74, 76, 2, 3, 4, 5, 7, 9, 11)
	Used Vactor truck to clean Catch basins on 5th and 6th (#'s 67, 68, 69, 66, 65, 64, 63, 62, 61, 60, 59, 88, 58, 56, 57,
04/16/12	55, 91, 92, 87, 86, 85, 84, 83, 82, 81, 80, 79)
04/01/47	Used Vactor truck to clean Catch basins on 4th St. (#'s 107, 106, 93, 94, 95)
04/30/12	Put out markers on catch basins along Spokane and Seltice
07/15/12	Collected storm water sample
08/29/12	Hung door tags
09/04/12	Hung door tags, dry weather inspection at 4th and centennial trail outfall





Home projects can result in runoff pollution

Residents urged to do their part: for cleaner river

From the Post Falls Water Division

Many of the materials that we use in our home improvement projects have the potential to pol- waste collection site. lute storm water if not disposed of properly, according to the city of Post Falls.

Materials such as paint, yard debris, sawdust, stucco, drywall, dirt, concrete and chemicals, if washed down a storm drain, can contaminate the Spokane River and beaches.

As a riverside community, Post Falls relies on clean water for its residents, a healthy river, public safety and a desirable environment for wildlife.

When it rains, many of the pollutants that get onto our streets, sidewalks, parking lots and gutters wash down the storm drains and into the river. Unfortunately, storm drains do not filter water or debris, nor are they connected to the wastewater treatment plant, so any pollutant that flows into the storm drain ends up in the river.

Urban runoff pollutants come from leaking cars, household chemicals, building materials pet and yard waste, soil erosion and litter.

Urban runoff pollution is preventable. Post Falls residents are encouraged to work together to create a cleaner community.

Painting tools should never be rinsed in the street or any area that might flow to the street. Oil-based paints and solvents can only be disposed of at a hazardous

It is illegal to deposit debris or dirt within the public right of way without permission of the city. If you must temporarily stockpile soil, locate and cover it with a tarp where it cannot be tracked or washed. onto the street.

Keep trash and other debris contained so that wind cannot blow it off of the property.

Building materials such as sawdust, dirt. grout, mortar, gypsum compound or drywall mud, plaster or stucco and concrete can't be placed upon or washed into swales, streets, gutters or storm drains.

If an accidental spill of any liquid building material or other hazardous waste occurs, absorbents or kitty litter must be applied immediately to prevent the spill from entering a storm drain.

Once the spill has been contained, contact your trash disposal company or Panhandle Health District for instructions on how to dispose of it.

The Post Falls Water Division can be reached at 777-9857,

new and get the fee process started as soon as

Environmental Open House

October 24, 2012 3:00 PM to 6:00 PM City of Coeur d'Alene Library Community Room

Visit with local Room agencies and groups as they demonstrate how they are working to preserve and improve our natural resources.

Partial List of Participants:

City of Coeur d'Alene Stormwater Management

Kootenai Environmental Alliance

City of Post Falls Stormwater Management

Waste Management

Bureau of Land Management

Tubb's Hill Foundation

Aquifer Protection District

Community Water Resource Center

Lakes Highway District

Idaho Department of Transportation

Post Falls Highway District

Stormwater Erosion Education Program

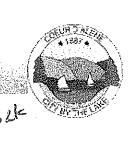
City of Coeur d'Alene Parks / Trails

City of Coeur d'Alene Urban Forestry

Community Action Partnership

City of Coeur d'Alene Water Department

For more information, contact Kim Harrington, City of Coeur d'Alene (208)769-2214 or kimh@cdaid.org



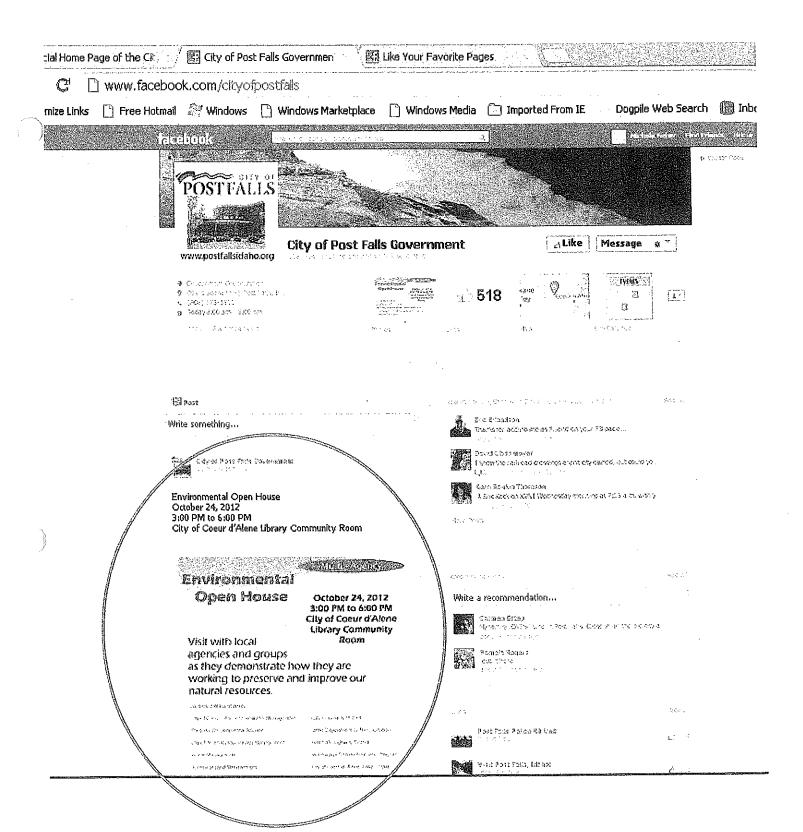
2012 ENVIRONMENTAL OPEN HOUSE

PLEASE SIGN IN AND THANK YOU FOR ATTENDING

Name

Sarah Nord	Olison Palme
Mike Neher.	Pat Ball
MikeHARFZ	Vice Walter.
Jim Artly	Therry Conklea
Stew anti-	Robyn Cole
Kim Harrington	Lallion Hough
Vornie Jensen	Dordon Dolly Shane Robats
Store: FARRIS	Gordon Dolly
T'erm bring.	Shane Roberts
RIKUARGENER	•
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Carol malcalor	allen Saaser
Steve Manthony-	Eula Hickan
Felicia Brusetle C	11405
Kathleen Lewis	Sathe Deber
Enc Olson RYA/PFHO/LHD	Bill Richman
Block Heral	
Charles Buck	U of Floh
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621







Public Services Department Utility Services Division

MEMORANDUM

DATE:

December 12, 2012

TO:

Storm Water File

FROM:

Mike Neher, Environmental Manager

SUBJECT:

Outfall Screenings 2012

On March 21, 2012, the following facilities were inspected during a runoff event and the following conditions were observed:

The two MS4 outfalls were operating properly; the water was murky.

The swale at Spokane Street bridge was operating properly.

The two culverts on Ponderosa were operating properly.

On November 26, 2012, all of the City's perimeter streets east of Spokane Street near the Spokane River were inspected. The near-river area covered on this date was from E. Kyong Court at Maplewood and west to Spokane Street, a distance of about 6 road miles. On December 12, 2012, all of the City's perimeter streets west of Spokane Street near the Spokane River were inspected. The near-river area covered on this date was from Spokane Street west to the state line on W. Seltice Way, a distance of about 9 road miles, and Q'emlin Park on the south side of the river.

1. Illicit Discharges

On these two dates, no illicit dischargers were observed in any of the surveyed areas listed above.

2. Storm Water Discharges to the Spokane River

- Excluding the two permitted MS4 river outfalls, no evidence of stormwater discharges to the river was found in any of the near-river areas of the City.
- Ninety-nine percent (99%) of the City's impervious surface area is served by an extensive system of curbs and gutters that directs runoff into swales and drywells or other natural areas. Only one percent (1%) of the impervious surface area is served by the MS4 facility with its two (2) storm water outfalls to the Spokane River. The road culvert just east of Timber Lane on Ponderosa Boulevard does not receive runoff from Ponderosa Boulevard. Rather, the runoff enters a drywell located along the property line behind 417 Timber Lane. Soils in the area are typically sand and gravel. Soils of this type have high infiltration rates between 4 and 10 inches per hour (Infiltration Characteristics, Performance, and Design of Storm Water Facilities, University of Washington, 2001). A street culvert located

2002 West Seltice Way, Post Falls, ID 83854 • tel (208)773-1438 • fax (208)773-0311 • www.postfallsidaho.org

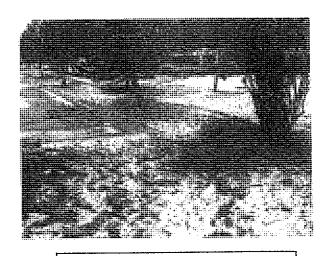
further east on Ponderosa Blvd near Pinewood Drive discharges to a swale and dry well on City property. This system has performed well since its installation in the summer of 2012.

- Properties near the river in Riverbend Industrial Park (west end of the City) were inspected on this date. All of the properties have curbs and gutters which direct runoff to swales and drywells. No evidence was found of any industrial or stormwater discharges to the river.
- Q'emiln Park on the south side of the river near Spokane Street was inspected on this date. The parking lots were wet from snowmelt. Previous runoff from the east parking lot had passed through a curb cut at the north east corner of the lot and created a shallow rill where apparently the water soaked into the sand. The trench drain at the boat launch was partially clogged and unable to flow freely into the swale and drywell provided. A minor volume of water was overflowing the trench drain and running to the side of the pavement where it soaked into the ground next to the docks. These items were referred to the Parks Department for maintenance.

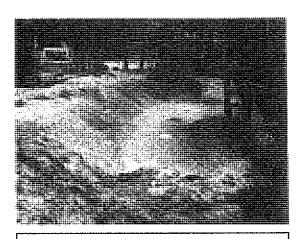
Mike Neher, Environmental Manager



12/11/12 Raycap Swale, Drywell.
Pipe is from drop inlet at west end of parking lot.



12/11/12 Tapmatic Swales



12/11/12 Pondersoa LS, Swale, Drywell



<u>Public Services Department</u> Utility Services Division

MEMORANDUM

DATE:

December 13, 2012

TO:

Stormwater Program File

FROM:

Mike Neher, Environmental Manager

SUBJECT:

Construction Site Inspection and Enforcement 2012

In 2012, there was one (1) construction project in the City of Post Falls that disturbed more than one acre and had the potential to discharge to the MS4 system. This project was the Blue Dog RV dealership located at 714 W. Seltice Way. The City required the project to apply for coverage under the Idaho Construction General Permit. The City verified that the project owner filed a Notice of Intent on the e-NOI system and had a storm water management plan on-site. Storm water technician, Adam Tate, inspected the project on March 29, 2012, April 26, 2012, May 21, 2012 and June 28, 2012. The June 28, 2012, inspection resulted in a verbal order for the contractor to maintain the silt fence until final stabilization. Stabilization of project soils with pavement and grass was completed in July 2012.

Mike Neher, Environmental Manager



POST FALLS

MEMORANDUM

DATE:

December 18, 2012

TO:

Storm Water File

FROM:

Mike Neher, Environmental Manager

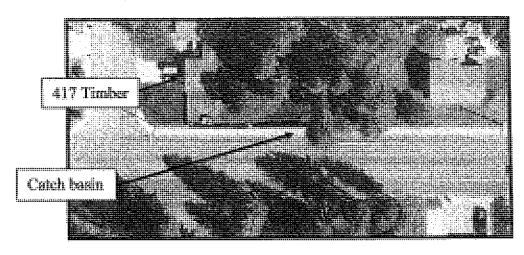
SUBJECT:

Ponderosa Street Culvert

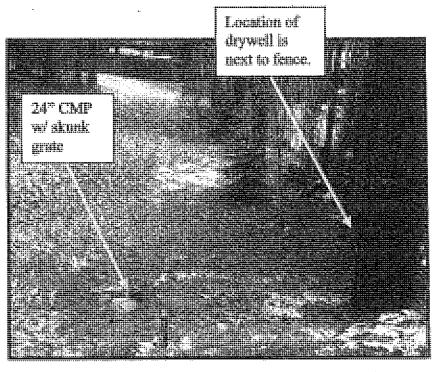
On December 17, 2012, Jim Porter, Maintenance Manager, showed me the location of the north end of the 24-inch CMP culvert and a drywell that takes water from the Ponderosa Street catch basin. Jim said that about 20 years ago he helped install the dry well on the north side of Ponderosa Street. The drywell is in the back yard of 417 Timber Lane. On December 18, 2012, Don Ellis met with the home owner and received permission to inspect the drywell and culvert. Don uncovered the top of the drywell and noted that the 6-inch drain from the street catch basin enters the drywell from the south west direction. The home owner indicated that the system has been working well and that the culvert does not receive any drainage water. The homeowner installed a grate on the CMP culvert to keep skunks out.

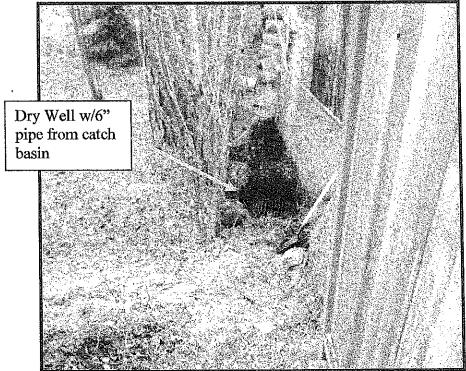
Therefore, the 24-inch CMP culvert has zero discharge and has no impact on the Spokane River.

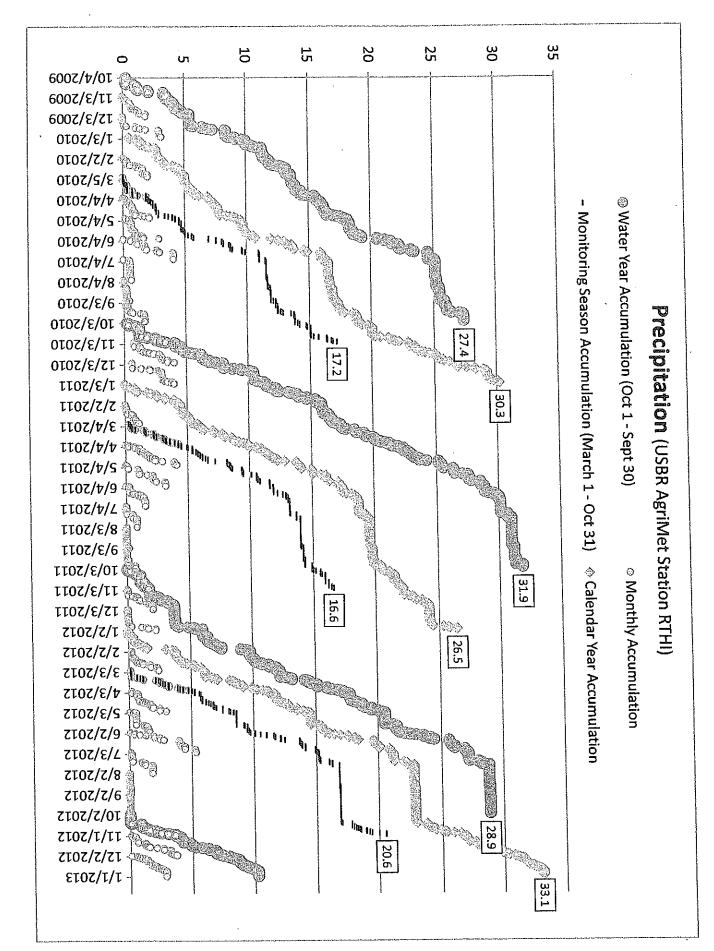
Mike Neher, Environmental Manager



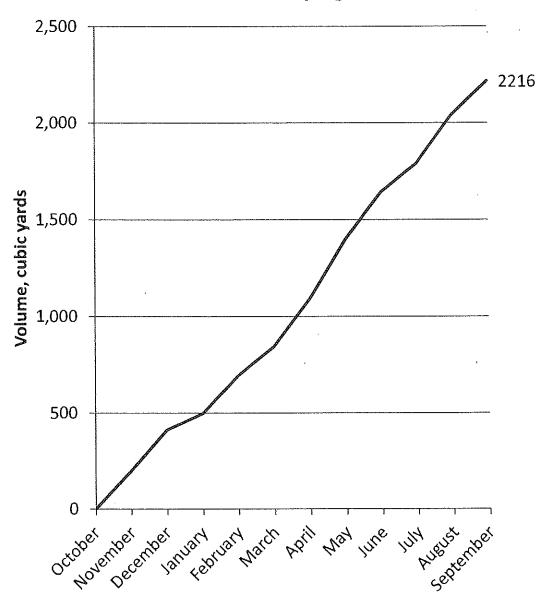
photos 12/17-18/12



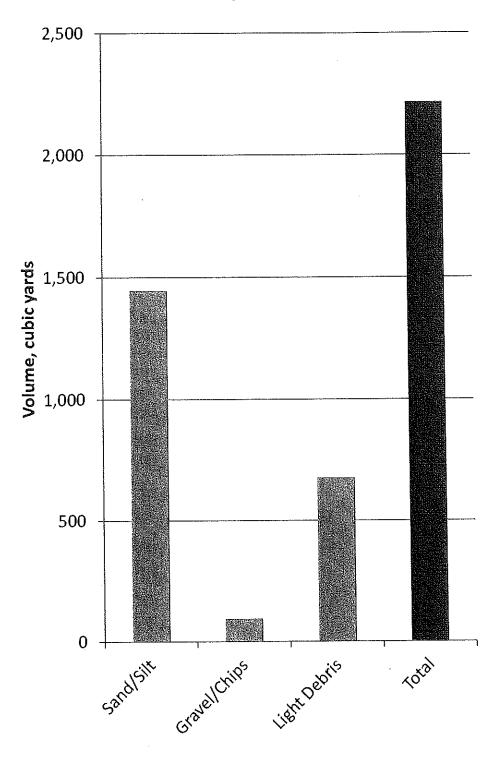




Cumulative Street Sweeping Volume FY2012



Street Sweeper Volume, FY2012



PROJECT NAME Blue Dog

STORMWATER INSPECTION REPORT

THIS REPORT IS INTENDED TO FULFILL THE REQUIREMENTS OF PART 3.11 OF THE NPDES GENERAL PERMIT FOR STORMWATER DISCHARGES FROM CONSTRUCTION ACTILITY, IDR10-0000

Inspection Schedule			
Inspection Date/Time	3/29/12 12:20 pm		
Type of Inspection	☐ Regularly Scheduled Inspection ☐ Pr	re-for	recasted Storm Event
	☐ During Storm Event	ost S	torm Event
Inspector Information			
Name	Adam Tate		
Title	Storm Water Tech		
Phone Number	208-773-1438		
Describe present phase of	of construction:		
	oured and they are starting to set the steel b	eams	s for the building.
Has there been a storm s	since the last inspection?		Yes 🗵 No
Rain Events (Dates)	Approximate Duration of Storm Event		Amount (inches)
Tani Dvona (Datos)	Tappionia de de la constante d		
			·
*			
	·		
,			
Weather Information D	uring Inspection		
Precipitation? ☑ Yes □	No Type: Light Showers		
	d from the site since the last		Yes 🛛 No
inspection?			100 23110
If Yes, describe			•
·			
Are there sediment disc	harges at the time of inspection?		Yes 🎘 No
If Yes, describe			
	•		
i			

	Page 2 Stormwate Project Name:	r Inspection Report	
╁	Observed I nesting	ns of Non-Compliance	
1	Location	Type of Control	1 Compacting Action/Maintenance Nected
-	II TAM CORRESONIA	Silt fence was down	Replace broken stakes and reattach the fence to the new stakes.
	Near the yard	across three sections	
١	hydrant next to	MOTORS THICK BOOK OFFI	(They fixed this problem immediately)
	the bike path		
	the orec put		
1			
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1			
f	<u> </u>		
1	*		
ļ			
Ì			
ļ			
Ì			
			·
			·
			·
	-b	1:	and above
	Describe any non-	compliance not describ	ed above.
		•	
	Starem Water Pa	Hutions Prevention Pl	an (SWPPP)
	Are changes to th	e SWPPP needed as a r	result of inspection? Yes No If yes, describe:
			•
		y (4 +d+.ππ	alandon days of inspection)
			alendar days of inspection):
,	Are changes to the	ne Site Map needed as a	a result of inspection? Yes No If yes, describe:
		. *	
	Deadline for char	nge (must be within 7 c	calendar days of inspection):

Page 3 Stormwater Inspection Report Project Name:
Compliance with SWPPP (check one)
Based on this inspection, this site is in compliance with the Stormwater Pollution Prevention Plan and the Construction General permit for Stormwater Discharges from Large and Small Construction Activities, and no updates/changes to the SWPPP are necessary at this time.
☐ Based on this inspection, this site is in compliance with the Stormwater Pollution Prevention Plan and the Construction General Permit for Stormwater discharges from Large and Small Construction Activities; however, updates/changes to the SWPPP are necessary at this time to document modifications that were agreed upon in the field.
This inspection found areas of the site that require maintenance and/or other action. Corrective action will be taken within1 days.
Signature and Certification
I certify that this document is an honest and true interpretation of erosion control conditions onsite and that I am qualified to properly gather and evaluate the information contained herein. The information submitted is, to the best of my knowledge, true, accurate and complete. I am aware that there are significant penalties for submitting false information.
Must Date: 3/29/12
Name (Inspector)
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.
Date:
Name (Responsible Authority)



Home

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· TARROTTAL ALOUTTON DOLATOR . TALLE D'ONNAIRE

Organization

FA

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Get Local Foreaust for: Enter location ...

Search Help

RSS Feeds

Current Hazards Watches / Warnings Outlooks NOAA Watch

Current Conditions Observations Radar Satellite

Satellite Precipitation Forecasts

Forecast Discussion Local Area Activity Planner Aviation Weather Fire Weather Severe Weather Hurricane Center Forecast Models Snow / Avalanche

Forecast Models Snow / Avalanche Hydrology Rivers and Lakes

Rivers and Lake
Climate
Local
National
Drought
More...
Climate portal
Weather Safety
Preparedness
Weather Radio
SkyWarn
StormReady

Spotter Information Additional Info Items of Interest Other Useful Links Education Resources COOP Observer Our Office Outreach/Education

Outreach/Educat Contact Us Contact Info Feedback



Climate Data Requested

Back to the clickable map Back to the data request form

Display Normals Display Records

<-- Prev Month Next Month --> <-- Prev Year Next Year ->

Observed Data for Coeur d'Alene March 2012

Day	Max	Min	Precip	Snow	Depth
1	35	29	0.08	0.0	4
2	M	М	M	M	M
3	39	28	0.00	0.0	0
4	47	37	0.00	0.0	0
5	54°	39	0.00	0.0	0
6	. 48	27	0.00	0.0	0
7	37	22	0.00	0.0	0
8	40	25	0.00	0.0	0
9	57	27	0.00	0.0	0.
10	63	35	0.00	0.0	0
11	52	38	0.05	0.0	. 0
12	42	29	0.32	0.0	0
13	44	29	0.74	0.0	0
14	43	30	0.00	0.0	0
15	43	30	0.49	0.0	0
16	48	30	0.51	0.0	0
17	47 .	33	0.20	0.0	. 0
18	47	30	${f T}$	0.0	0
19	47	29	0.00	0.0	. 0
20	40	29	0.07	1.0	1
21	45	31	0.24	0.0	0
22	45	31	0.78	1.0	1
23	38	31	0.05	0.0	0
24	41	29	0.00	0.0	0
25	46	31	0.00	0.0	0
26	59	37	0.21	. 0.0	0
27	42	31	0.52	0.0	. 0
28	51	31	0.07	0.0	0
29	M	М	M	. <u>M</u>	M
30	М	M	M	M	М
31	M	М	M	M	M

Avg 45.9 30.7 4.33

Dep -3.1 -0.3 2.33 .1.0

*(Departure from climatological normals)

£.

2.0

roject name $\underline{\mathcal{S}}$	ne Dog			
ולפון 'אולא או יהודים א <i>התא</i> יא מלפול איחוז	TO THE THE THE PART OF THE PAR	rre MDD	PS CENERAL PERMIT FOR STORMW	'ATER
HIS REPORT IS INTENDED TO ISCHARGES FROM CONSTRU	FULFILL THE REQUIREMENTS OF PART 3.11 OF TACTION ACTILITY, IDR10-0000	TE NEDI	C) OF ARMY LEGILL 1 CITY OF THE	
Inspection Schedule	Marth			
Inspection Date/Time	4/26/12 / 8:10 A1	7		
Type of Inspection	Regularly Scheduled Inspection I	,	ecasted Storm Event	
	☐ During Storm Event ☐ ☐	Post St	orm Event	
Inspector Information	<u> </u>			
Name	Adam Tate			
Title	Storm water Techo			
Phone Number	773-1438			
Describe present phase	of construction:			
Framing in Bo	ilding			
1 laring	· /		•	
	•			
			•	
Has there been a storm	since the last inspection?	NO.	Yes □ No	
D ' E (D-4)	Approximate Duration of Storm Event		Amount (inches)	
Rain Events (Dates)	Approximate Duration of Storm Event		Tamount (mass)	
	-			
3				
Weather Information	During Inspection			
Precipitation? Yes	☑ No Type:			
	ged from the site since the last		Yes 🛛 No	
inspection?				
If Yes, describe				
			•	
Are there sediment di	scharges at the time of inspection?		Yes 🖾 No	
	_		1 100 00 110	, to
If Yes, describe				

Page 2 Stormwater Inspection Report					
Project Name:					
Observed Locations of Non-Compliance Location Type of Control Corrective Action/Maintenance Needed					
Location	Type of Control	CORRECTION AND INTERNATION 1400000			
		·			
	-				
•					
•					
Describe any non-compliance not described above:					
Storm Water Po	Hutions Prevention P	lam (SWPPP)			
		result of inspection? Yes No If yes, describe:			
Are changes to th	e Swppp needed as a	result of hispection? 12 165 12 140 11 yes, deserted.			
Deadline for change (must be within 7 calendar days of inspection):					
Are changes to the Site Map needed as a result of inspection? ☐ Yes ☒ No If yes, describe:					
Are changes to tr	ie vitte tatah needen as :	the strong of the beautiful to the strong of			
Deadline for char	nge (must be within 7	calendar days of inspection):			

Page 3 Stormwater Inspection Report
Project Name: Compliance with SWPPP (check one)
Based on this inspection, this site is in compliance with the Stormwater Pollution Prevention Plan and the Construction General permit for Stormwater Discharges from Large and Small Construction Activities, and no updates/changes to the SWPPP are necessary at this time.
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Mame (Inspector) Date: 4/26/12
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Name (Responsible Authority)

Explanation of the Preliminary Monthly Climate Data (F6) Product

These data are preliminary and have not undergone final quality control by the National Climatic Data Center (NCDC). Therefore, these data are subject to revision. Final and certified climate data can be accessed at the NCDC - http://www.ncdc.noaa.gov.

WFO Monthly/Daily Climate Data

000 CXUS56 KOTX 261500 CF6GEG PRELIMINARY LOCAL CLIMATOLOGICAL DATA (WS FORM: F-6)

STATION: SPOKANE WA AIRPORT

MONTH: APRIL
YEAR: 2012
LATITUDE: 47 37 N
LONGITUDE: 117 32 W

T	EMPE	RATU	JRE I	N F	;	:	PCPN:	5	SNOW:	WII	ND		:	SUNS	HINE:	SKY	<u></u>	:PK W	ND ===
1	2	==== 3	4	5	6A	6B	7	8	9	10	11		12	13	14	15	16	17	1.8
את	MAX	мтм	NVC	DE P	ממח	CDD	WTR	SNW	12Z DPTH	AVG SPD				MIN	PSBL	S-S	WX	SPD	DR
===	LIVI	====			====	-===	======	=====			===:	===	====	- <u></u> -	====	====			====
1	47	33	40	4	25	0	0.06	0.1	0	16.	1 3	3 2	230	M	М	7	1		220
2	48	31	40	-4	·25	0 .	0.00	0.0	0	7.	3 1	3	80	М	M	6		17	80
3	61	33	47	2	18	0	0.00	0.0	0	10.	4 2	2 :	280	M	M	6		28	280
4	43	32	38	-7	27	0	0.28	1.0	0	10.		_	240	M	M	_	12	25	230
5	41	28	35	10	30	0	T	T	0	3.	9 1	0	200	M	M	-		13	190
6	43	26	35	-10	30	0	0.14	T	0	5.			300	M	М		12	20	250
7	51	29	40	5	25	0	0.00	0.0	0	4.			60	M	M		1	13	70
. 8	58	31	45	-1	20	0	0.00	0.0	0	10.		0:	50	М	M			23	50
9	64	41	53	7	12	0	0.00	0.0	0	7.		.5	60	M				17	80
10	67	44	56	10	9	0	0.00	0.0	0	5.		4	60	M				16	
11	65	40	53	7	12	0	0.05	0.0	0		_		220	M				28	
12	57	38	48	2	17	0	0.00	0.0	0		5 2		220	М				25	
13	57	36	47	1	18	0	0.00	0.0	0		-		220					15	•
14	60	33	47	1	18	0	T	0.0	C		6 2		260					30	
15	55	41	. 48	1	17	0	T	0.0			.2 1		270					28	
16	50	40	45	-2	20	0	0.16	0.0) (230		_	_	_		230
17	51	34	43	-4	22			0.0) (220		_	_			190
18	52	40	46	1	. 19	0	0.01	0.0) (210			1 9			220
19	55	34	45	-3	20	0	0.14	0.0) (230		_	1			2 190
20	60	47	54	6	11	. 0	0.01	0.0) (230		-	-	3 1		2 230
21	67	47	57	9	8	0		0.0) (220		_	_	5		5 220
22	79	46	63	15	5 2	. 0	0.00	0.0) (14	60		· -	-	4	10	
23	81	52	67	19) () 2	T	0.0) (38	230				5		9 210
24	73	53	63	14	1 2	2 0	T	0.0) (220				7		7 220
25	71	48	60	11	L 5	5 C	0.07	0.0)	0 7	.0	20 ===	190) I	M =====	M ====	7 13	2	8 200 =====
SM	145	6 9	57		412	2 2	0.93	3	1.1	207	.6				M	17	7	·	
AV	58.	2 38	3.3	·===				MI	===== : SC				STS' 23	-	M	M	7 #	MAX (M 49 2	PH) 10

4/26/2012

6220

LAST OF SEVERAL OCCURRENCES

COLUMN 17 PEAK WIND IN M.P.H.

PRELIMINARY LOCAL CLIMATOLOGICAL DATA (WS FORM: F-6) , PAGE 2

STATION:

SPOKANE WA AIRPORT

MONTH:

APRIL

YEAR:

2012

LATITUDE: 47 37 N

LONGITUDE: 117 32 W

SYMBOLS USED IN COLUMN 16 [TEMPERATURE DATA] [PRECIPITATION DATA] AVERAGE MONTHLY: 48.3 0.93 1 = FOG OR MISTTOTAL FOR MONTH: -0.16 2 = FOG REDUCING VISIBILITY DPTR FM NORMAL: DPTR FM NORMAL: 1.8 TO 1/4 MILE OR LESS 81 ON 23 GRTST 24HR 0.28 ON 4-4 HIGHEST: 3 = THUNDERLOWEST: 26 ON 6 4 = ICE PELLETS SNOW, ICE PELLETS, HAIL 1.1 INCHES 5 = HAILTOTAL MONTH: 6 = FREEZING RAIN OR DRIZZLE GRTST 24HR 1.0 ON 4-4 7 = DUSTSTORM OR SANDSTORM: 0 . GRTST DEPTH: VSBY 1/2 MILE OR LESS 8 = SMOKE OR HAZE [WEATHER - DAYS WITH] 9 = BLOWING SNOW [NO. OF DAYS WITH] X = TORNADO 0 0.01 INCH OR MORE: MAX 32 OR BELOW: MAX 90 OR ABOVE: 0.10 INCH OR MORE: 0 0.50 INCH OR MORE: 0 MIN 32 OR BELOW: 6 1.00 INCH OR MORE: MIN O OR BELOW: [HDD (BASE 65)] CLEAR (SCALE 0-3) 0 TOTAL THIS MO. 412 PTCLDY (SCALE 4-7) DPTR FM NORMAL -52CLOUDY (SCALE 8-10) TOTAL FM JUL 1 5900 DPTR FM NORMAL [CDD (BASE 65)]

[PRESSURE DATA]

HIGHEST SLP M ON M

LOWEST SLP 29.44 ON 11

[REMARKS]

TOTAL THIS MO.

DPTR FM NORMAL

TOTAL FM JAN 1

DPTR FM NORMAL

2

2

project name <u>3</u> (re Day					
STORMWATER INSPE	CTION REPORT	TO NUMBER CENTED AT DEPART FOR STORMWATER				
THIS REPORT IS INTENDED TO I DISCHARGES FROM CONSTRUC	FULFILL THE REQUIREMENTS OF PART 3.11 OF TH TION ACTILITY, IDR10-0000	E NY DES GENERAL FERMIT POR BIORINATION				
Inspection Schedule	Monthla					
Inspection Date/Time	6/28/17 12:30 PM					
Type of Inspection	☑ Recorded to Cohe duled Increasion □ Po	re forecasted Storm Fivent				
	☐ Regularly Scheduled Inspection ☐ Pre-forecasted Storm Event					
	☐ During Storm Event ☐ P	ost Storm Event				
Inspector Information	4					
Name	Idan Tate					
Title	Stormwater Tech					
Phone Number	773-1438					
Describe present phase						
Paving Parking	lot, Preping for hydre	seed.				
	N.					
,						
Was dearn hans a starres	since the last inspection?					
inais fuele meem a sidiam :	Sunder and itself breakbeardant	☑-Yes □ No				
Rain Events (Dates) Approximate Duration of Storm Event Amount (inches)						
See attached Papers.						
	<u> </u>					
Weather Information D	uring Inspection					
Precipitation? Yes	No Type:					
the same of the sa						
Has sediment discharged from the site since the last						
If Yes, describe						
		·				
Are there sediment discharges at the time of inspection?						
If Yes, describe						
ii i co, neociiuc						
1						

Page 2 Stormwater Inspection Report					
Project Name: Observed Locations of Non-Compliance					
Location	Type of Control	Corrective Action/Maintenance Needed			
edge of sife	S:1+ fence down.	Repair silt fence, hydrose	eel,		
			·		
·					
Describe any non-compliance not described above: Storm Water Pollutions Prevention Plan (SWPPP) Are changes to the SWPPP needed as a result of inspection? Yes No If yes, describe:					
Deadline for change (must be within 7 calendar days of inspection):					
Are changes to the Site Map needed as a result of inspection? Yes No If yes, describe: Deadline for change (must be within 7 calendar days of inspection):					

Page 3 Stormwater Inspection Report Project Name:
Compliance with SWPPP (check one)
☐ Based on this inspection, this site is in compliance with the Stormwater Pollution Prevention Plan and the Construction General permit for Stormwater Discharges from Large and Small Construction Activities, and no updates/changes to the SWPPP are necessary at this time.
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Ah St Date: 6/28/12
Name (Inspector)
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Date:
Name (Responsible Authority)

project name <u>Ri</u> d	e Dog			
THE WITH A WIND WARD	CTION REPORT	THE STATE OF THE STATE OF STAT		
THIS REPORT IS INTENDED TO DISCHARGES FROM CONSTRUC	FULFILL THE REQUIREMENTS OF PART 3.11 OF TE	HE NPDES GENERAL PERMIT FOR STORMWATER		
Inspection Schedule	Monthly			
Inspection Date/Time	5/21/12 10:15 AM			
Type of Inspection	☐ Regularly Scheduled Inspection ☐ P	ra forecasted Storm Event		
.	Regularly Scheduled Inspection 12.1	10-1010edStott Stoffi Evens		
	☐ During Storm Event ☑ F	Post Storm Event		
		·		
Inspector Information				
Name	Adam Tate			
Title	Storm water Tech			
Phone Number	1773-1938			
Describe present phase	of construction:	solve (sol /+		
Building is bed	ng Sided and they are f	ocephing to asphall.		
	,			
		•		
		•		
•				
Has there been a storm	since the last inspection?	ĭ Yes □ No		
		7		
Rain Events (Dates)	Approximate Duration of Storm Event	Amount (inches)		
5/2		./2		
5/3		.29		
5/21				
Weather Information I	Physica at Hongradustildan			
Precipitation? X Yes				
	ed from the site since the last	☐ Yes ☒ No		
inspection?				
If Yes, describe				
Are there sediment discharges at the time of inspection?				
Are there sediment discharges at the time of inspection?				
If Yes, describe				
		•		
1				

Project Name: Observed Locations of Non-Compliance						
Joserved Local Location	Type of Control	Corrective Action/Maintenance Needed				
740.C98 64.00 au	HARA AT CAMER AT					
		·				
•						
		·				
	• • • • • • • • • • • • • • • • • • •					
E)	n-compliance not descr	ibed above:				
Describe any no	n-comphance not descr	nect above.				
,						
Storm Water I	Pollutions Prevention l	Plam (SWPPP)				
Are changes to	the SWPPP needed as a	result of inspection? Yes No If yes, describe:				
J						
Deadline for ch	ange (must be within 7	calendar days of inspection):				
		a result of inspection? Yes No If yes, describe:				
* 11 A STYMTERS 100						
		•				

Page 3 Stormwater Inspection Report Project Name:
Compliance with SWPPP (check one)
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Date:
Name (Responsible Authority)



Department/Division: Water R	
Date(s) of Training: 9/12 - 9/18/12	- Supervisor's Signature: Les Eschlar
Titles or Subjects of Training:	, ,
Stormwater polle	tran and prevention
awareness	
Attendance List (print names):	Signature:
R. Froehlich	Run Brosenfiel
C. Worldy	Colties
Don Ellis	A-SIN
Bryan Petersen	By the
Ryan R Benson	Ry P. Bensen
TOM VALENZORCA	Long Welengula
Adam Tate	ala A
Carlos Betancourt	Carlo Koto
Bob Hatcher	Bob Hatcher
1. BRY S. BARKley	Maks Hackle
Nick Colhoff	The home
	·



Department/Division: Cemetery				
Date(s) of Training: 9-13-2012	_Supervisor's Signature: <u>Lewi Palu</u>			
Titles or Subjects of Training:				
Video: City of SAND S	Rings Stormurater			
Video: City of Sand Springs Stoemwater Video: Stormwater Runoff: 101				
	DU			
Attendance List (print names):	Signature:			
KEVIN PALMER	La Rolman			
John Best	12 Sear			
,				
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Department/Division: Parks & Recreat	ion / Park Maintenance	
Date(s) of Training: 10/5/12	_Supervisor's Signature: Ryon Kenypto	
Titles or Subjects of Training:		
Storm Water Pollution Aware	eness and Prevention Trai	
Attendance List (print names):	Signature:	
mike Parker	Miko Barker	
BRYAN MYERS	303	
Allen Hildebrant	M. 2/1/63	
NATHAN SYLVESTER	January Waller Car	
DEB BROCK	Rhock	
	De est	
Bryan Bergstrom	18 yant Ergt to	
*		



Department/Division: SUTLOTNE DIL	LESTO W
Date(s) of Training: 16-29-12	Supervisor's Signature: Rusullland
Titles or Subjects of Training:	
STORM WATER; WHY TAKE IT	PERSON ALLY
STORMWATER VIDEO	
STORMWATER RUNOFF 101 VIOL	- o
Attendance List (print names): RVSSELL CORNELL	Signature: Russelllerall
JUSTIN MILLER	
	
	·



Department/Division:	
Date(s) of Training: 10.25-12	_Supervisor's Signature:
Titles or Subjects of Training:	·
Attendance List (print names): MgH Isch Bill U Boace P I.M L Jahren J.M L	Signature: Will meyord Broke Some Some Some Some Some Some Some Som
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Department/Division: Planning	
Date(s) of Training: 10/30/12	Supervisor's Signature: 4\QUYOF\QLUXSV
Titles or Subjects of Training:	O
Storm Water: Why Take It Personally?	•
Stormwater Runoff 101 Video	,
Attendance List (print names):	Signature:
Hilary Anderson	thlay andleson
Jon Manley	Sonather L. Mauley
Kelley Setters	Leve Setters
· · · · · · · · · · · · · · · · · · ·	Public Control of the
ACC 100 CONTROL OF THE TOTAL OF	



Department/Division: STreeT / Traffic	
Date(s) of Training: 10/30/12	_Supervisor's Signature:
Titles or Subjects of Training:	
Saudy Springs	
Stormwater Run of 101	
Why Take it personally?	
Attendance List (print names):	Signature:
Ken Paterson	
Bruce Lesterberg	Bunglester
Ctint Boren	CATH
Dan Johnson	
•	
	•



Department/Division: 5/19245	
Date(s) of Training: 10/30/12	Supervisor's Signature: Steer Late
Titles or Subjects of Training:	
Stormwater Video Sandy	Springs
Attendance List (print names):	Signature:
JOHN A. WHITE	Joly A. When
JOHN BOWMN	July Bournes
Keith S. Hardy	Frish & Hordy
R. AUBREY	RA
Kesin Desiles	X Week
Steve Take	Steen John
the second secon	
	territoria de la composición del composición de la composición de la composición de la composición del composición de la composición del composición de la composición del composición del composición del composición del composición del composición del composición d
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Department/Division: PW MainTenance and Fleet				
Date(s) of Training: 10/30/12	Supervisor's Signature:			
Titles or Subjects of Training:	. \			
Stormwater runoff 101				

Attendance List (print names):	Signature:			
Jim forter	10 de			
David Hawkes Tim Dewitt				
I'M DEWII	1 K Johnson			
· · · · · · · · · · · · · · · · · · ·				
	- ·			



Department/Division:	PW		
Date(s) of Training:	11-1-12	Supervisor's Signature:	
Titles or Subjects of Train	ing:	A	
511 21/11	as Austra	gess y Revent	TOALS
	ON 11000 C	1655 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
Attendance List (print nar	nes): Day	Signatur2:	
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APPENDIX – H

SCHEDULE OF PLANNED IMPLEMENTATION ACTIVITIES FOR 2013

The activities planned for the 2013 reporting period include the following:

- 1. Public education
 - a. Storm water article published in the local newspaper
 - b. Storm water article published on the City website
 - c. Storm water public service announcement broadcast on City's cable TV channel
 - d. Public education events, such as "Environmental Open House"
 - e. Direct mail or hand delivered brochure as needed
- 2. City staff education: provide training materials related to City job functions as they relate to storm water.
- 3. Storm water monitoring: at least 4 samples during the required monitoring season.
- 4. Storm water system maintenance: inspect and clean catch basins
- 5. Reapply for MS4 discharge permit
- 6. Screen outfalls for dry weather flows
- 7. Assess the adequacy of BMPs
- 8. Complete the 2013 annual report
- 9. Post on-line all annual reports and the storm water management plan
- 10. Conduct pre-construction plan reviews, construction site inspections and enforcement as needed

APPENDIX – I

SCHEDULE OF PLANNED BMPs NEEDED TO COMPLY WITH WATER QUALITY STANDARDS

As demonstrated by the monitoring data in Appendix C, the Post Falls MS4 does not cause violations of Idaho in-stream water quality standards for the Spokane River. Therefore no additional BMPs are needed for the Post Falls MS4.

END OF REPORT