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BACKGROUND

On November 14, 2022, the EPA inspection team of Joan Rogers, Dean Maraldo, and Ted Flatebo, traveled to the City of East St. Louis (City) to conduct an inspection of the City’s Municipal Separate Storm Sewer System (MS4) program and determine the City’s compliance with their MS4 National Pollutant Discharge Elimination System (NPDES) Permit (Permit), number ILR400332. The Permit was issued by Illinois Environmental Protection Agency (IEPA) on March 1, 2016 and expired on February 28 2021 but was administratively extended. The Permit authorizes the City to discharge stormwater to the Mississippi River through a separate sewer system. This inspection was an announced inspection and was scheduled with the Director of Public Works, Mr. Timothy Lockett.

IEPA’s last inspection of the City of East St. Louis’ MS4 program on September 28, 2017. The City was issued a Noncompliance Advisory on November 13, 2017. The Noncompliance Advisory instructed the City to respond in thirty calendar days to and to promptly undertake these actions:

- a. Conduct inspections of all industrial and maintenance activities,
- b. Affix decals to all street drain inlets,
- c. Install secondary containment structures under all drums and containers,
- d. Move used tires inside or cut them up,
- e. Cover all dumpsters,
- f. Repair the salt storage dome door.
- g. Continue to participate in training programs and MS4 quarterly meetings,
- h. Accurately document all work accomplished in support of the MS4 program,
- i. Review the St. Clair County stormwater ordinance with City employees,
- j. Present on the MS4 program annually,
- k. Have the Notice of Intent and annual reports available if needed to be reviewed, and
- l. Notify IEPA if the individual in charge changes.

OPENING CONFERENCE AND INTERVIEW

Ms. Rogers, Mr. Maraldo, and Mr. Flatebo arrived the City of East St. Louis Administration Building, 301 Riverpark Drive, in East St. Louis at 8:08 A.M. EPA inspectors presented credentials to Mr. Lockett, Ms. Pearson, and Mr. Stith. Mr. Mayfield was not present at that time.

EPA provided an opening conference and explained the purpose of the inspection. Mid-way through the interview, Mr. Mayfield arrived, and the EPA team presented credentials to him.

During the interview, Mr. Lockett stated that the City's municipal properties include three fire houses, the police department in the City Hall building, and the Public Works facility at 613 N. 20th Street. The City is part of an MS4 co-permittee group with neighboring communities and St. Clair and Madison Counties. The City joined the co-permittee group in 2002. Previously, the engineering firm of RJN Group provided service to the co-permittee group, but that has recently changed to the Gonzalez Group. For a fee, the Gonzalez Group prepares the annual reports, Notices of Intent (NOI), and conducts the quarterly sampling for the co-permittee members. Ms. Tammy Mezo of the Gonzalez Group had been invited to the inspection but declined to participate. Ms. Rogers requested a copy of the contract between the City and the Gonzalez Group.

Mr. Lockett explained that the City's sewers consist of combined and separate sewers. The sewers east of North 69th Street are separate and covered under the MS4 Permit. Ms. Rogers asked if the City had a map of the separate sewer system and Mr. Lockett stated that he has one at the Public Works Garage. Ms. Rogers states that she would like to see that map when the inspection team goes to the Public Works Garage.

The Street Department is part of the Public Works Department. It is funded by the motor fuel tax. There is no household recycling program in the City and no drop off points for household recycling.

St. Clair County runs the "Clean Sweep Program". In this program, residents are notified of the timing of the debris pick up that the county will then pick up. Typically, ten city blocks are identified for debris pick up at a time.

The City owns a street sweeper and it is used daily. The City sweeps all the main roads and cleans the inlets to the storm sewers. The debris from the streets are dumped in the public works yard, separated, and sent to a landfill.

Storm sewers are also jetted with the goal of three public works employees jetting sewer lines every day. Those sewers could be separate or combined storm or wastewater sewers. The City typically will focus on one area at a time unless a problem area is identified.

Complaints are distributed to the public works employees for investigation and the City has an after hour call list for emergency calls. Mr. Stith stated that public works employees are instructed to observe the roads for flooding during rain events and to shovel out the stormwater inlet if it is clogged.

The City also has one stormwater pump station, called the Parkside Pump Station. Stormwater that flows into the pump station is pumped to Harding Ditch. The pump station building needs a new roof, as the current roof is partially gone, but the City installed a lock on the door to the station which didn't have one during previous inspections. Currently, only one of the three pumps are functioning and another of the pumps is being repaired by Vandevanter Engineering.

Ms. Rogers requested to see the Notice of Intent to be covered under the NPDES General Permit for Storm Water Discharges from Separate Storm Sewer Systems (MS4) and the Storm Water Management Plan as required by Part IV.A. of the NPDES Permit. Mr. Lockett stated that both documents would have to be provided by the Gonzalez Group.

Ms. Rogers explained that the MS4 Permit has six Minimum Control Measures that are intended to prevent pollution from entering the storm sewer system and ultimately to waterways. Ms. Rogers asked Mr. Lockett and Mr. Stith to provide information during the interview of the City's efforts for each Minimum Control Measure. Mr. Lockett provided the following information on the six Minimum Control Measures.

Public Education and Outreach

Mr. Lockett stated that the City has brochures available to the public and the City had distributed approximately 150 brochures. When asked for copies of the brochures, Ms. Pearson provided six different brochures via email on November 28, 2022. The titles of the brochures are:

- Stormwater Management Best Management Practices published by St. Clair County.
- Living on the Water's Edge published by the Lake County Stormwater Management Commission (February 2016).
- St. Clair County's Resident Stormwater Guide published by St. Clair County.
- St. Clair County's Stormwater Guide for Businesses published by St. Clair County.
- St. Clair County's Stormwater Guide for Kids published by St. Clair County.
- When It Rains, It Drains originally published by the Colorado Stormwater Council.

Public Involvement and Participation

The City personnel have attended the meetings of the co-permittees and the county engineer gave a briefing on the MS4 procedures and the NOI at a Transportation Committee meeting on January 31, 2022.

Illicit Discharge and Elimination

Mr. Lockett stated that the City has a prohibition on dumping and illicit connections in the City ordinance. EPA requested a copy of the ordinance but did not receive it. EPA also requested a copy of the storm sewer map, but did not receive that, either.

Mr. Lockett also stated that in a contract with Hurst-Roche for bridge inspections, Hurst-Roche looks for illicit discharges while conducting the bridge inspection. Ms. Pearson provided a copy of the bridge inspection proposal from Hurst-Roche (dated 7/5/22) but the proposal did not mention observing the waterways for illicit discharges.

Construction Site Stormwater Runoff

Mr. Lockett says that when there is construction, the City enforces all the code requirements for sediment controls and stormwater pollution prevention plans (SWPPP). He stated that there is a new home construction project called Landsdowne UP in the Landsdowne neighborhood that is under construction.

Post Construction Stormwater Management in New Development

Mr. Lockett stated that there is nothing to report on in this measure.

Pollution Prevention and Good Housekeeping for Municipal Operations

Mr. Stith stated that the City personnel maintain the public works yard and they check daily that there has been no illegal dumping. Since this had previously been an issue, the City has installed concrete barricades at the entrance to the public works yard.

Mr. Stith also stated that the City has ongoing on-the-job training for new employees and monthly meetings for safety. A sign in sheet is used to document attendance at the trainings. Mr. Stith stated that the City has a covered dome for the storage of road salt and the salt is kept pushed away from the door.

Ms. Rogers asked if there were any current storm sewer projects ongoing in the City. Mr. Lockett stated that there is a current study being done by Thompson Civil Engineering for the intersection of North 32nd Street and Geitz Avenue due to flooding concerns. But that is in a combined sewer area of the City.

Ms. Rogers reiterated the list of requested documents. They are:

1. Most recent MS4 Annual Facility Inspection Report.
2. Sewer map with inlets and outlets identified.
3. Brochures available to the public.
4. Notice of Intent.
5. Contract between the City and the Gonzalez Group.
6. Most recent bridge inspection report from Hurst-Roche.
7. Storm Water Management Plan.
8. City Ordinance prohibiting illicit discharges.

The March 2021-March 2022 Annual Facility Inspection Report was provided to EPA during the inspection. EPA observed the stormwater map and took photos of the map because a digital copy did not exist. The map is dated from 1994 and does not encompass all the separate storm sewers, but only the Parkside neighborhood.

As previously mentioned, the brochures were provided via email on November 28, 2022. Ms. Pearson also provided the NOI and the contracts for professional services and sampling between the City and the Gonzalez Group on November 28, 2022.

EPA has not received a copy of the Storm Water Management Plan or the City Ordinance prohibiting illicit discharges.

FIELD OBSERVATIONS

At 9:42 A.M. the EPA team left City Hall for the Public Works Garage and other field observations. Ms. Rogers stated that she would like to observe:

1. The Public Works Garage and Municipal Lot
2. An example of stenciling on stormwater inlets.
3. The Landsdowne UP construction site.
4. The Parkside Pump Station.
5. An outfall of the stormwater system to a waterway, if possible.

Public Works Garage at 613 20th Street, East St. Louis
(See photos from field work in attached Photolog)

At the Public Works Garage office, the EPA team observed the map of the Parkside neighborhood and Parkside and Wedgewood Pump Stations. The map, dated August 1, 1994, identified recommended improvements to the infrastructure in the area. The EPA team identified outlet structures in the detention basin across 69th Street from the lift station that it wanted to try to observe in the field.

In the Public Works Garage, the EPA team met Mr. Doug White, Mechanic, who showed the inspection team the three floor drains over a trench drain that led to the sanitary sewer outside the building. Mr. White said the trench drain was flushed approximately one week prior to the inspection.

Vehicles are power washed and repaired in the garage. Oil Dri Absorbant is used to absorb grease on the floor which is then swept up before the floor of the garage is washed down. The garage floor is swept and mopped daily, and power washed one to two times per week.

Outside the garage, two 800-gallon fuel storage tanks are located underground. One holds diesel fuel, and one holds gasoline. EPA observed old drums along the fence line. Mr. White stated that they contain water and are stored there until they can be recycled. Used oil is stored on site until it can be picked up by a contractor.

Well pumps, hoses, and barricades are stored outside, in trailers along the northeast wall of the garage. Mr. White stated that there are no storm sewer inlets on the property and the property does not flood. EPA observed one dumpster without a cover on it.

East St. Louis Storage Yard

On the southeast side of North 20th Street and south of the Public Works Garage is the East St. Louis Storage Yard where the City's salt dome is located. EPA observed the piles of dirt from the street sweeper which will be taken to a landfill. EPA also observed piles of used tires. Mr. Stith stated that the tires have been there for five to six months and the City is waiting for the IEPA to pick them up. The pick-up by IEPA is scheduled for December 5, 2022.

EPA observed the salt dome. In a previous IEPA inspection report, the IEPA inspector recommended that the City repair the door for the salt dome. Mr. Stith stated that the salt dome never had a door. The overhang above the salt dome entrance had been damaged but was not affecting the protection of the salt. There was a large pool of water around the salt dome from poor drainage, but the water was not entering the dome. There were no storm sewer inlets on this property.

EPA observed many blue drums stacked on the property next to the City's storage yard. The drums had signs on them that indicated that the contents were sodium chloride. The City did not own the property, and had never observed the blue drums before. Mr. Stith and Mr. Lockett said that they would contact the owner and have the drums removed.

EPA also observed a culvert structure in the back of the yard near the railroad tracks. EPA could not determine if this structure was an inlet to a storm sewer. EPA also observed that runoff near the entrance to the yard could flow down the driveway and to the street. There were storm sewer inlets along the curbs in the street. EPA also noted that the storm sewer inlet did not have any stenciling on it to indicate that it flows to a waterway.

CSO Outfall 003

At 10:50 A.M. the inspection team arrived at the City's CSO Outfall 003 at North 47th Street and Lake Drive and observed the CSO signage that was installed at the outfall.

Parkside Pump Station

The inspection team arrived at the Parkside Pump Station at 10:55 A.M. Mr. Lockett stated that the flapper gates from the station to the Harding Ditch were still in need of repair. The flapper gates prevent water from flowing back into the station when the level of water in Harding Ditch is high. The flapper gates have been broken since before April 2021 when Ms. Rogers conducted a CSO inspection in the City. EPA also observed the condition of the pump station. There was no roof in some sections of the station and equipment was rusted and inoperable. Mr. Lockett stated that only one of the three pumps were operable and the one of the pumps had been removed and was being repaired.

The EPA inspectors went to the detention basin across the street from the Parkside Pump Station and tried to locate the outlet that was identified on the 1994 map. They could not find the outlet.

Landsdowne UP

At 11:23 A.M., the inspection team arrived at the new home construction site called Landsdowne UP. Twenty single-family homes are being built in the Landsdowne neighborhood by Plocher Construction. EPA requested to speak with someone from the construction company. While waiting for someone from the construction company to arrive, EPA noted that the stormwater inlets were protected by silt fences.

Arianna Kampwerth, the Project Engineer, arrived and Ms. Rogers asked if the company had a SWPPP and an NOI for a stormwater permit. Ms. Kampwerth stated that they had an Erosion Control Plan, a SWPPP, and the required stormwater permits. Ms. Rogers asked Ms. Kampwerth to provide copies of these documents via email. Ms. Kampwerth emailed the documents later the same day, on November 14, 2022.

CLOSING CONFERENCE

Ms. Rogers provided a closing conference to Mr. Lockett at 11:51 A.M. on the site of the Landsdowne UP project. Ms. Rogers stressed that the City needs to continue to go to the meetings that the Gonzalez Group holds for the co-permittee group and keep records of the trainings that city personnel take for the MS4 Permit. Ms. Rogers also reiterated the list of documents that are needed from the City.

EPA concluded the inspection at 11:55 A.M.

RECORDS REVIEW

EPA evaluated the documents provided during the inspection and afterward. Below is an evaluation of the compliance with the Permit based on the documentation provided.

Notice of Intent (Part II.B.)

The NOI required elements are listed as well as the details from the City's NOI.

- Date: January 14, 2022
- Name, Address and Phone Number of Operator(s) and Person responsible for implementing the MS4 Program: Candiac Pearson, Administrative Assistant, is listed as the authorized representative for MS4 Permit. Terrance Stith is listed as another contact person responsible for implementation or coordination of Stormwater Management Program.
- Name of receiving waters and if they are impaired: The NOI lists Schoenberger Creek, Mississippi River, Dot Creek, Harding Ditch, and Cahokia Canal as the receiving waters. All are identified as impaired and/or have a TMDL.
- BMPs and Measurable Goals for each BMP: See description of each below.
- Certification that the City has implemented the BMPs: The certification statement is signed by Terrance Stith.

Special Condition (Part III.C.)

This special condition requires that an MS4 review their stormwater management program to determine whether the TMDL or watershed management plan includes requirements for control of stormwater discharges if a TMDL allocation is approved for any water body into which it discharges. The City's NOI states that none of the receiving waterbodies are included in an approved TMDL or alternate water quality management plan.

Storm Water Management Programs (Part IV.A.)

The Permit states that the permittee must develop, implement, and enforce a stormwater management program which must include the minimum control measures. EPA did not receive any separate document titled "Storm Water Management Program".

Six Minimum Control Measures (Part IV.B.)

1. Public Education and Outreach on Storm Water Impacts (Part IV.B.1.)

A.1. The City's NOI lists distribution of stormwater brochures created and distributed to the Co-permittee members by St. Clair County. The measurable goals include tracking and reporting how many brochures are distributed. The annual report lists 150 of 200 printed brochures were distributed.

A.4. The NOI also lists a St. Clair County Health Department sponsored booth at the annual County Fair. Brochures would be distributed at the County Fair. The County Fair was cancelled in 2021 due to COVID but was planned for May 2022.

A.5. Lastly, the county will post newsletters on the County Health Department website for students during the school year from August to May. The individual communities are to communicate the availability of the newsletters to the schools. The East St. Louis

annual report lists the distribution of 150 educational brochures as the measurable goal for this BMP. It is unclear if these are the same 150 brochures listed in BMP A.1.

Evaluation

- The educational materials do not include information on the potential impacts and effects on stormwater discharge due to climate change as required by Part IV.A.1.a.
- The goals for this control measure are to ensure the reduction of all the pollutants of concern in the permittee's stormwater discharges to the maximum extent practicable. It is unclear and unmeasurable if the distribution of brochures or sponsoring a booth at a county fair reaches that goal.

2. Public Involvement/Participation (Part IV.B.2.)

B.3. The co-permittee group meets to share Best Management Practices, complete reports, and provide trainings. The Gonzalez Group held quarterly meetings in 2022 and from an email forwarded by IEPA inspector Wayne Caughman on November 15, 2022, the Gonzalez Group states that no one from East St. Louis attended the meetings until after the EPA inspection in November 2022.

B.5. The County distributed new brochures with a Storm Water Hot Line to report illicit discharges or dumping. The City updated its website with the new information and stated that it will continue to respond to and record all public complaints of illicit discharge and/or dumping and stormwater issues.

B.6. The City will participate in programs targeted at public awareness of stormwater and recycling activities by the County. The City promoted the County programs like the Clean Sweep Program which collected 30,000 tons of waste, according to the annual report. Additionally, the County sponsored recycling of tires, paint, batteries, fluorescent bulbs, plastic, hazardous waste, medicine, a "Litter Clean Up" program, and large item pickups.

B.7. The City will hold at least one public meeting to solicit public input regarding the adequacy of the MS4 program. The City provided MS4 information during a public meeting of the Transportation Committee on January 31, 2022.

Evaluation

- The City has not regularly participated in the co-permittee group meetings and trainings. The only person who attended one of the co-permittee meetings in 2022 was Ms. Pearson, who is not an operator and who is not the targeted audience for trainings on reducing road salt usage, visual water sampling, and operations.
- The City has not identified that it has met the requirement to identify environmental justice areas within its jurisdiction and included appropriate public involvement or participation as required by Part IV.B.2.d.

3. Illicit Discharge Detection and Elimination

C.1. Storm Sewer Map Preparation. The NOI and Annual Report state that the storm sewer map is complete as of 2018. EPA has requested this map and it has not been provided.

C.2., C.9. The County was to distribute brochures to the community at the Earth Day event, but the event was cancelled. No illicit discharge brochures were distributed to the community.

C.5. Evaluate any stencils/markers of poor quality and any unmarked or new stormwater inlets that need stencils. The City assessed the condition of the stencils and is documenting inlet status as funding and staffing permits.

C.6. The City will observe streams for illicit discharges during annual bridge inspections.

Evaluation

- The City has not provided, or shown the completed storm sewer map to EPA.
- The City has not provided a copy of the ordinance that prohibits illicit discharges in the storm sewer system and requires enforcement and reporting.
- The City has not developed a program to detect and eliminate illicit connections, discharges, non-stormwater discharges, or illegal dumping as required by Part IV.B.3.a. and Part IV.B.3.d.
- The City does not conduct periodic inspections of the storm sewer outfalls in dry weather conditions or inspect major/high priority outfalls at least annually. Relying on bridge inspections at a small number of bridges may not be adequate to meet the requirement of Part IV.B.3.h.

4. Construction Site Storm Water Runoff Control

D.1. Require SWPPPs at all construction sites that disturb over one acre of land. The City also verifies the proper use of sediment and erosion control techniques.

D.2. This BMP stated that City representatives would attend BMP training during the Annual Operations Training in December 2021 but the City representatives were not able to attend.

D.5. The County operated a Storm Water Hot Line for complaints about stormwater related issues.

D.6., D.7. Training for Construction Site Inspectors last took place in 2017, and no training was required for the time period 2021-2022.

Evaluation

- Training opportunities should be taken whenever offered as refresher for current employees and for new employees.
- An observation of the construction site during the field portion of the inspection showed that there was attention paid to protecting the stormwater inlets and preventing runoff.

5. Post-Construction Storm Water Management in New Development and Redevelopment

E.2. The City will continue to enforce their stormwater ordinance.

E.4. The City will review post construction BMPs on all sites that disturb more than one acre in land.

Evaluation

- The City had no examples of post-construction stormwater management.

6. Pollution Prevention/Good Housekeeping for Municipal Operations

F.1. The co-permittee group had an Operations Training class. City representatives were unable to attend.

F.6. The City was to review operating procedures and BMPs and modify if necessary. The annual report does not have any detail when the operating procedures and BMPs were reviewed and the outcome of that review.

Evaluation

- Training opportunities should be taken whenever offered as refresher for current employees and for new employees.
- Reporting on the review of operating procedures and BMPs annually is required by Part IV.B.6.f. There was no documentation that the review has been completed.
- The City's Public Works Yard and Storage Yard do not have any areas where runoff can reach a waterway or a storm sewer inlet, except at the driveway to the Storage Yard.
- City vehicles are washed in the Public Works Yard and the wash water flows through a trench drain to the City's sanitary sewer.
- The City stores their deicing material under roof and the salt dome appeared to be in satisfactory condition.

Reviewing and Updating Storm Water Management Programs (Part IV.E.)

The City must perform an annual review of its Storm Water Management Program. EPA has not been provided a copy of the City's Storm Water Management Program.

Monitoring, Recordkeeping, and Reporting (Part V.)

Monitoring (Part V.A.)

The City must develop and implement a monitoring and assessment program to evaluate the effectiveness of the BMPs. This should include an evaluation of the effectiveness of the BMPs by utilizing sampling and visual observations. Although sampling is being done in the City by Gonzalez Group, there is nothing in the annual report that lists the analysis of the sampling and how it compares with previous years' sampling.

Recordkeeping (Part V.B.)

The City must keep the NOI, Storm Water Management Plan, Annual Reports and monitoring data for five years after the expiration of this permit and must be made available for review. Additionally, the NOI, Storm Water Management Program Plan, and Annual Reports are to be posted on the City's website. EPA could not locate these documents on the City's website.

Reporting (Part V.C.)

The City must submit an annual report by the first day of June and post the report on the City's website. The annual report must include:

1. An assessment of the appropriateness and effectiveness of the identified BMPs and progress toward achieving the goal of reducing the discharge of pollutants to the

maximum extent practicable. During the review of the annual report, there are no identified goals for each BMP that can be used to measure progress of pollution reduction.

2. The status of compliance with permit conditions. There is no mention in the annual report of compliance or non-compliance with the permit.
3. Results of information collected and analyzed, including monitoring data. The analysis of the sample data is not in the annual report.
4. A summary of the storm water activities the City plans to undertake during the next reporting cycle. The annual report details which BMPs are planned to be continued into the next year and the breakdown of the activities for each BMP if they change each over the five-year permit term.
5. A change in any identified BMPs or goals. The annual report details which BMPs are not to be continued into the next year.
6. Notice that the City is relying on another government entity for some of the permit obligations. The annual report lists St. Clair County as the other entity performing actions for the City's MS4 Permit.
7. Provide an updated summary of any strategy pursuant to a TMDL. The NOI states that there are no TMDLs on any of the receiving waterways.

AREAS OF CONCERN

1. EPA has not received the requested Storm Water Management Program or a copy of the City's ordinance that prohibits illicit discharges.
2. Piles of used tires stored at the City's Storage Yard can retain water and become a breeding ground for mosquitos.
3. The Parkside Pump Station is in disrepair. Part of the roof is missing, the flapper gates are not installed or working, the equipment in the station is rusted and only one of the pumps is functional.
4. The educational materials do not include information on the potential impacts and effects on stormwater discharge due to climate change as required by Part IV.A.1.a. of the Permit.
5. Other than Ms. Pearson attending one of the co-permittee meetings, other City representatives did not attend the meetings and trainings in 2022. Public Works operators missed trainings on reducing road salt usage, visual water sampling, and operations.
6. The City has not identified that it has met the requirement to identify environmental justice areas within its jurisdiction and included appropriate public involvement or participation as required by Part IV.B.2.d.
7. EPA was not shown the sewer map that is referenced in the NOI and annual report that is complete and was last updated in 2018. Instead, EPA was shown a map from 1994 that only depicted the Parkside neighborhood.
8. The City has not developed a program to detect and eliminate illicit connections, discharges, non-stormwater discharges, or illegal dumping as required by Part IV.B.3.a. and Part IV.B.3.d. Relying on bridge inspections at a small number of bridges may not be adequate to meet this requirement.
9. The City does not conduct periodic inspections of the storm sewer outfalls in dry weather conditions or inspect major/high priority outfalls at least annually. Relying on bridge

inspections at a small number of bridges may not be adequate to meet the requirement of Part IV.B.3.h.

10. City representatives did not attend BMP training during the Annual Operations Training in December 2021 as BMP D.2. stated they would.
11. Reporting on the review of operating procedures and BMPs annually is required by Part IV.B.6.f. There was no documentation that the review has been completed.
12. There is no monitoring and assessment program to evaluate the effectiveness of the BMPs. Although sampling is being done in the City by Gonzalez Group, there is nothing in the annual report that lists the analysis of the sampling and how it compares with previous years' sampling and if the BMPs have been effective in reducing the discharge of pollutants as required by Part V.A. of the Permit.
13. The NOI, Storm Water Management Program Plan, and Annual Reports are not posted on the City's website as required by Part V.B. of the Permit.
14. There are no identified goals for each BMP that can be used to measure progress of pollution reduction to the maximum extent practicable.