

NAMPA HIGHWAY DISTRICT NO. 1

4507 12th Avenue Nampa, Idaho 83686

ANNUAL REPORT

National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4)

Permit No. IDS-028142

January 9, 2012

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INTRODUCTION

This document is an Annual Report for Permit No. IDS-028142 issued by the U.S. Environmental Protection Agency to the Nampa Highway District No. 1 (NHD) as part of the National Pollution Discharge Elimination System (NPDES). The permit allows the discharge of storm water from NHD's Municipal Separate Storm Sewer System (MS4) to waters of the United States, within the Nampa Urbanized Area.

The permit is of five (5) years duration with an October 15, 2009 start date and an October 14, 2014 expiration date. This is the second Annual Report of the permit, and covers the period from October 15, 2010 through October 14, 2011.

The Storm Water Management Program spreadsheet shown in Appendix B provides an overview of the control measures required by this permit, the compliance dates for those measures, and a brief synopsis of each reporting requirement pertaining to those measures. This information is also discussed in detail in the narrative sections.

ANNUAL REPORT CERTIFICATION

for

Nampa Highway District No. 1 Permit No. IDS-028142

National Pollutant Discharge Elimination System Municipal Separate Storm Sewer System (MS4)

Annual Report for Permit Year 2010-2011

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 gather and evaluate 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.

Casey Bequeath, Director

Nampa Highway District No. 1

2012 JDate

PERMIT PART IV.C ANNUAL REPORTING REQUIREMENTS

Part IV.C of the permit specifies nine (9) reporting requirement which must be contained in the Annual Report. Each of these is discussed below.

Part IV.C.1 – Control Measure Status

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.

There is also a stand-alone discussion of Part II.C requirement in "Other Reporting Requirements" towards the end of this Annual Report.

Part II.B.1 – Public Education and Outreach (Compliance Due Date: 10/14/2011)

This element has been implemented.

During this reporting period NHD revised its stormwater brochure and posted it on the NHD web site. The City of Nampa also posted it on its web site. Hard copies were also made available to the public by placing in the NHD office foyer, as well as the City Halls of the Cities of Nampa and Melba, and the Melba Senior Citizens Center. Copies of the brochure will also be distributed at any future NHD public meeting, but no such meetings were held during this reporting period.

The brochure targets pollutants of concern by informing the public of specific ways they can reduce or eliminate the discharge of those pollutants into stormwater.

The NHD web site also includes a public comment form, but to date no stormwater comments have been received.

The effectiveness of these measures will be evaluated by measuring how many brochures are taken by the public at the various distribution sites. Also, by the number of attendees at any public meetings, and the number of feedback comments from the NHD web site. In later reporting years, when further control measures are in place for the detection of illicit discharges, we will evaluate whether there is any correlation between the efforts of these Public Education control measures and reduction in illicit discharges.

Appendix A shows examples of the stormwater brochure, the NHD stormwater web page, and City of Nampa stormwater web page.

NHD is also a member of the Canyon County MS4 Stakeholders Group, which is comprised of the following members:

- City of Nampa
- City of Caldwell
- City of Middleton
- Nampa Highway District
- Canyon Highway District
- Notus-Parma Highway District
- Ada County Highway District
- Idaho Transportation Department

NHD will continue to participate in this Stakeholders Group, and "piggy-back" on the stormwater efforts of neighboring agencies as opportunities arise.

Part II.B.2 – Public Involvement/Participation

(Online Postings – Compliance Due Date: 10/14/2012) (Public Feedback Receipt & Tracking – Compliance Due Date: 10/14/2011)

This element has been implemented.

There have not been any public meetings during this reporting period. All relevant SWMP documents and all Annual Reports are posted on NHD's regularly maintained website. The NHD website stormwater page has a public comment form. The website also provides general NHD phone number and email address if anyone wants to comment via those means. Any comments received will be tracked and action taken or questions answered as appropriate. There have been no stormwater related public comments received during this reporting period.

These control measures target pollutants of concern by notifying the public by brochure and public meeting, specifically how they can reduce or eliminate the discharge of pollutants of concern into stormwater. The system of receiving, considering, and answering public comments targets pollutants of concern by answering public questions about the pollutants, or allowing the public to notify NHD of illicit discharges.

The effectiveness of these measures will be evaluated by measuring how many brochures are taken by the public at the various distribution sites. Also, by the number of attendees at any public meetings, and the number of feedback comments from the NHD web site. In later reporting years, when further control measures are in place for the detection of illicit discharges, we will evaluate whether there is any correlation between the efforts of these Public Education control measures and reduction in illicit discharges.

Part II.B.3 – Illicit Discharge Detection and Elimination (Compliance Due Date: 10/14/2012)

During this reporting period, NHD began an ongoing education program to inform its employees, businesses, and the general public of hazards associated with illegal discharges

and improper disposal of waste. The initial part of this program educated businesses and the public through distribution of the revised stormwater brochure as discussed in Part II.B.1 above. NHD employees received periodic stormwater education in five different instances in conjunction with NHD's monthly safety meetings.

NHD developed a preliminary map of outflow locations during the 2009-2010 reporting period, but did not make any further progress on it during the 2010-2011 period. NHD has not work on any of the additional control measures of this performance element, but will fully implement all elements of this control measure by the compliance date.

Part II.B.4 – Construction Site Storm Water Runoff Control (Compliance Due Date: 10/14/2012)

During this reporting period, NHD continued to make progress on several elements of this control measure, and has completely implemented one of them. See the Appendix B Storm Water Management Program spreadsheet for an overview.

II.B.4.a & II.B.4.b – NHD continues to require all operators to have a SWPPP and file an NOI for projects which disturb more than one acre of land, whether the operators are NHD forces, a NHD contractor, or others who are permitted to work on NHD right-of-way or facilities. There is currently no official program for this, however. Where NHD is not the owner of a project, inspection and enforcement of the SWPPP is left to other authorities.

II.B.4.c – NHD has not begun work toward adopting an ordinance or other control measures to require construction site operators to practice erosion, sediment and waste control. NHD does not have ordinance authority, so the implementation of any ordinance must be done by the government of Canyon County.

II.B.4.d – NHD has not begun work toward distributing written requirements for construction site best management practices for new building and service are construction.

II.B.4.e & II.B.4.f – NHD routinely reviews and approves all plans for construction activities which occur on NHD right-of-way or facilities, but there is no written procedure governing this. During this reporting period, NHD added a public comment feedback form to receive, track, and take action on stormwater related comments received from the public. There have been no public comments to date, however.

II.B.4.g – NHD routinely inspects all construction sites on NHD right-of-way or facilities. There is no written policy, however, prioritizing how construction sites will be inspected.

II.B.4.h – This element is fully implemented. NHD currently ensures all NHD-owned construction projects comply with EPA Construction General Permit. During this reporting period, NHD filed a Notice of Termination (NOT) for Permit No. IDR10C868 for the Deer Flat Extension project. The only other construction project currently under permit is Cool

Rd. Extension (Permit No. IDR10CI43). These notices are shown in Appendix A. Both projects are located outside of the Nampa Urbanized Area. Approximately 16 construction SWPPP inspections were made on Deer Flat, and 22 on Cool Rd. during this reporting period.

NHD will fully implement all elements of this control measure by the compliance date, except for those involving ordinances. NHD does not have ordinance authority. It will attempt to have the necessary ordinances enacted, but the authority to do so rests with the government of Canyon County, which is a separate political entity from NHD.

Part II.B.5 – Post-Construction Storm Water Management in New Development and Redevelopment (Post-Construction – Compliance Due Date: 10/14/2013) (Long Term & Pre-Construction – Compliance Due Date: 10/14/2014)

NHD has not worked on this control measure during this reporting period. NHD will fully implement all elements of this control measure by the compliance date, except for those involving ordinances. NHD does not have ordinance authority. It will attempt to have the necessary ordinances enacted, but the authority to do so rests with the government of Canyon County, which is a separate political entity from NHD.

Part II.B.6 – Pollution Prevention and Good Housekeeping for Municipal Operations (Compliance Due Date: 10/14/2013)

NHD has not worked on this control measure during this reporting period. NHD will implement all elements Parts II.B.6.a and II.B.6.b of this control measure by the compliance date.

II.B.6.c – This control measure is for a storm water pollution prevention plan for the NHD fleet maintenance and equipment site. On January 12, 2011, NHD sent a request to remove this requirement from the permit (see Appendix A). The reason for this request is because (1) the site is outside the Nampa Urbanized Area and therefore outside the MS4 jurisdictional area, and (2) the site has no outfalls or discharges to Waters of the U.S.

Part IV.C.2 – Information Results

Results of any information collected and analyzed during the previous 12 month period, and any other information used to assess the success of the program at improving water quality to the maximum extent practicable.

No data has been collected or analyzed during this reporting period. NHD will collect, analyze and report on information as control measures are developed and implemented.

Part IV.C.3 – NHD Inspections

A summary of the number and nature of inspections, formal enforcement actions, and/or other similar activities performed by the permittee.

No formal enforcement actions or other similar activities were performed during this reporting period. Several inspections were conducted as follows:

- **Deer Flat Road Extension Project** NHD owned project to build 1 mile of new roadway (outside of Nampa Urbanized Area). NHD performed approximately 16 SWPPP inspections during this reporting period, and filed a Notice of Termination (NOT) in June 2011.
- **Cool Road Extension Project** NHD owned project to widen and straighten approximately ³/₄ mile of roadway (outside of Nampa Urbanized Area). Notice of Intent (NOI) was filed in November 2010. NHD performed approximately 22 SWPPP inspections and countless construction inspections during this reporting period.
- Nampa Booster Station A city owned project under permit to NHD to install a new water line. Approximately 6 construction site inspections made by NHD during this reporting period.
- Nampa School District Sewer/Water Line A school district owned project under permit to NHD to install new sewer and water lines. Approximately 16 construction site inspections made by NHD during this reporting period.
- **TW Telecom** A utility owned project under permit to NHD to install fiber optic cables. Approximately 4 construction site inspections made by NHD during this reporting period.

Part IV.C.4 – Non-EPA Enforcement Actions

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 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).

No enforcement actions were received from the EPA or other regulatory agencies during this reporting period.

Part IV.C.5 – Copies of Products

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.

The products developed during this reporting period are shown in Appendix A, and consist of the following:

- Revised NHD Stormwater Brochure
- Stormwater Page from NHD Web Site

- Stormwater Page from City of Nampa Web Site (includes NHD Stormwater Brochure)
- NOT for Deer Flat Road Extension Project
- NOI for Cool Road Extension Project
- Request letter to EPA to delete Part II.B.6.c requirement from MS4 Permit

Part IV.C.6 – Future Activities

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.

The Appendix B Storm Water Management Program spreadsheet gives an overview of planned future activities for each minimum control measure. These are discussed in detail above in Part IV.C.1 – Control Measure Status.

Part IV.C.7 – Additional BMPs

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 to the maximum extent practicable.

NHD has not found any need to date for additional BMP's. As control measures are implemented and evaluated for effectiveness, any needed additional BMP's will be developed and discussed in future Annual Reports.

Part IV.C.8 – Reliance on Other Parties

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

NHD is not currently relying on any other entity to satisfy any permit obligations.

NHD voluntarily participating in the Canyon County MS4 Stakeholders Group to share ideas and resources in the implementation and evolution of our respective Storm Water Management Programs.

Part IV.C.9 – Recent MS4 System Additions

A description of the location, size, receiving water, and drainage area of any new MS4 outfall(s) owned or operated by the permittee added to the system since the previous annual reporting period.

There have been no new MS4 outfalls added to the system during this reporting period.

Additions are usually made by new development or changes in the Nampa Urbanized Area. There have been no new developments due to the recent market downturn. The 2010 census may result in an expansion of the Nampa Urbanized Area, which may add some existing outfall locations into the system.

OTHER GENERAL REPORTING REQUIREMENTS

The following are discussions of reporting requirements in addition to those of Part IV.C.

Part II.C – How Pollutants of Concern are Targeted and Evaluated

The permit identifies "pollutants of concern" as total phosphorus, sediment, E. coli. The Appendix B Storm Water Management Program spreadsheet gives an overview of how these pollutants of concern will be targeted and measured by each minimum control measure.

Second Reporting Year - The first measures were implemented during this reporting period, and are discussed in detail above in Part IV.C.1 – Control Measure Status.

Third Reporting Year – The next measures to be implemented (in 2012) will be in the categories of Illicit Discharge Detection and Elimination, and Construction Site Storm Water Runoff Control.

Illicit Discharge targets will consist of visual inspections and sampling, the establishment of allowable limits, and surveying the geographic locations of significant potential sources of pollutants. The effectiveness will be measured and evaluated through the results of further inspections and sampling.

Construction targets will consist of emphasizing adherence to existing environmental permitting regulations, including inspections and documentation. Also establishing allowable limits, and distributing educational materials to contractors and project owners. These materials will include discussions of the requirement to have a "Responsible Person" assigned to projects, and other responsibilities of pollution prevention, inspection and permitting. The effectiveness will be measured and evaluated by inspection results, and asking operators to complete a close-of-project survey form.

Final Reporting Years – The final measures to be implemented (in 2013 & 2014) will be in the categories of Post-Construction Storm Water Management in New Development and Redevelopment, and Pollution Prevention and Good Housekeeping for Municipal Operations.

Post-Construction targets will consist of visual inspection and sampling similar to those implemented in the Third Reporting Year. It will also include required use of post-construction practices and best management practices. The effectiveness will be measured and evaluated through the results of further inspections and sampling.

Municipal Operations targets will consist of established industrial procedures, use of best management practices, inspections and training to specifically reduce or eliminate pollutants of concern. The effectiveness will be measured through follow-on inspections and evaluation of the employee general knowledge and practice toward pollution prevention.

Part II.D – Annual Review

NHD has made an annual review of the Storm Water Management Program, and requests that the Part II.B.6.c requirement to develop a SWPPP for Highway District fleet maintenance yard be removed because it is outside of the Nampa Urbanized Area. Part I.A of the permit states, "This permit covers all areas within the Nampa Urbanized Area…including the permittee's maintenance and equipment yard." Since the yard is outside of this area, it appears to be outside of the jurisdiction of the permit.

There are no other requested changes.

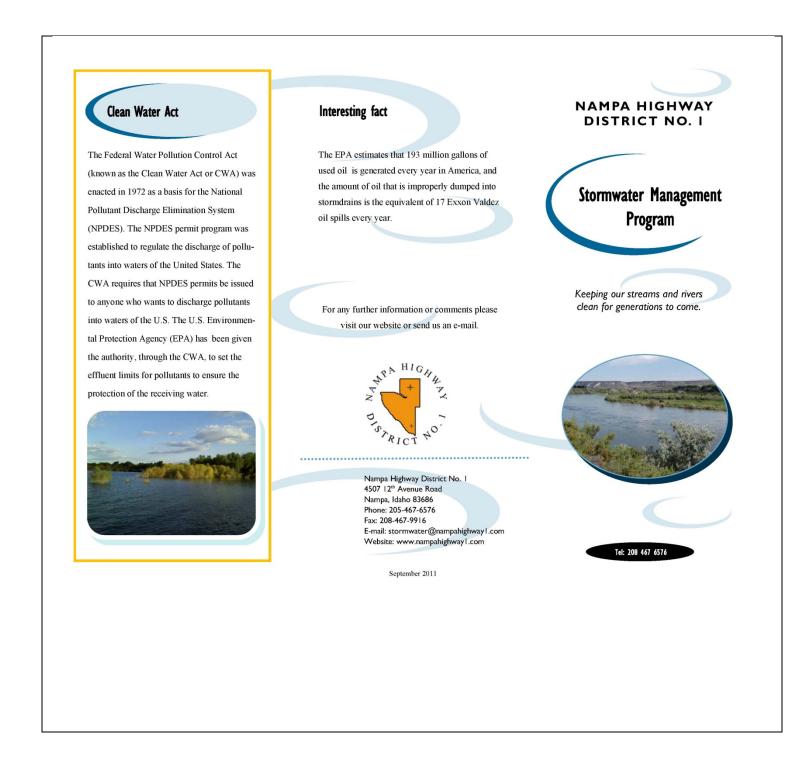
Part IV.A.2 – Quality Assurance Plan

The permit requires the permittee to develop a Quality Assurance Plan (QAP) prior to conducting any discharge or surface water monitoring, and to submit the QAP or updates thereto at least 270 days prior to beginning the monitoring effort. As discussed above, NHD plans to implement monitoring as part of detection and elimination of illicit discharges and dry weather screening (Part II.B.3), and post-construction storm water runoff monitoring (Part II.B.5), which will likely occur in 2012 and 2013. Once the QAP is developed, it will be submitted 270 prior to beginning of monitoring as required by the permit.

APPENDIX A

Part IV.C.5 – Copies of Products

Stormwater Brochure (Bi-fold Front)



Stormwater Brochure (Bi-fold Back)



Nampa Highway District is providing this brochure to you for more information on stormwater pollution, and what you can do to reduce or eliminate it.

What is Stormwater?

Stormwater is the runoff from melting snow or a rain storm. As stormwater flows across hard surfaces such as parking lots, streets, concrete, or rooftops, it does not penetrate into the ground, but rather it is collected in a stormwater system. As stormwater moves across these surfaces, it collects harmful materials like fertilizer, oils and sediment that effect water quality, and can be detrimental to aquatic life as well as human health.



Pollutants of Concern

The EPA has outlined some pollutants that are of concern in this area. These pollutants are <u>Total Phosphorus</u>, <u>Sediment</u>, and <u>E. coli</u>.

<u>Total Phosphorus</u> is the total concentration of phosphorus that is measured in a water sample. Phosphorus is an essential nutrient in the environment, but too much of it can be harmful to a fresh water body



source. An increased level of phosphorus can create excessive plant growth and algae blooms, as well as decrease the dissolved oxygen levels which are essential for aquatic life.

Higher levels of phosphorus can come from several different sources. These sources include

urban runoff, construction sites, feedlots, agricultural fields, failed septic systems, fertilizers, and human waste.

<u>Sediment</u> is small material that has broken away from rocks or unconsolidated soil deposits due to weathering. It is collected with the stormwater and is then de-

posited into streams, rivers and other water bodies.

<u>E. coli</u> (*Escherichia coli*) is a form of fecal coliform bacteria that exist in the intestines of humans and animals. E. coli is present in animal and human waste; it can be washed into water bodies during a storm event or snow melt.

How you can avoid polluting the water

 Keep debris such as leaves, pet waste, and litter out of storm drains



- * Use fertilizers sparingly and follow the manufacturer's directions.
 - Do not over water lawns and ensure that the sprinklers do not over spray onto roadways.



 Plant ground cover to help control soil erosion.

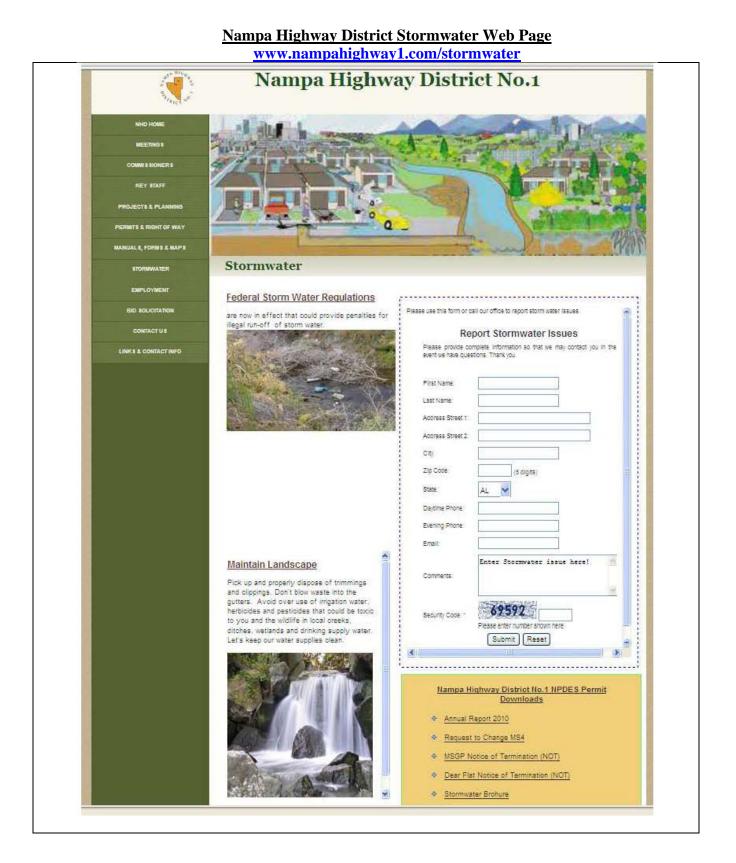


* Dispose of grease, oils, antifreeze and other household chemicals properly. Do not pour them down the storm drain.

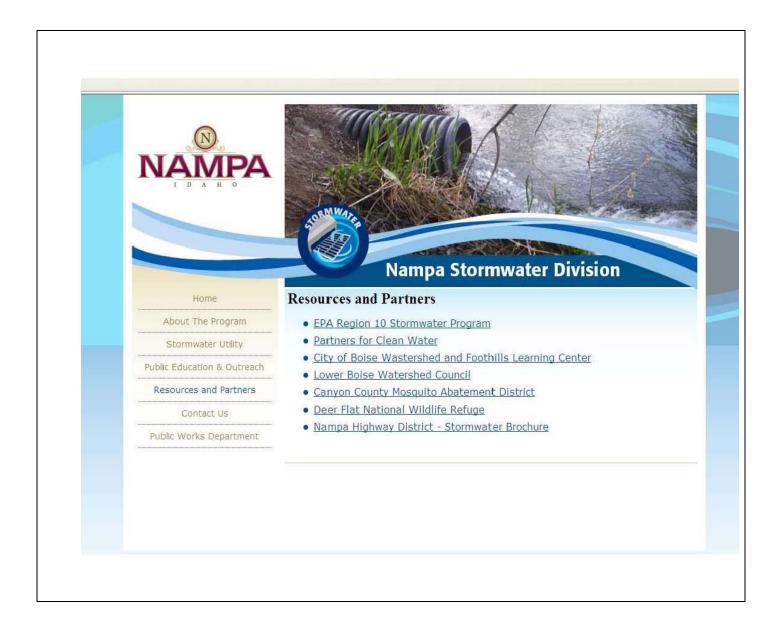
Clean up oil, antifreeze and grease spills with an absorbent material, do not wash them into the street with water.



Use only household detergents and cleaners that have low amounts of phosphorus.



<u>City of Nampa Stormwater Web Page</u> <u>www.cityofnampa.us/stormwater</u>



Deer Flat Project Notice of Termination (NOT)

| Th | is Form Replaces Form 3517-7 (8-98) fer to the Following Page for Instructions |
|--|--|
| NPDES Form | United States Environmental Protection Agency Washington, DC 20460 Notice of Termination (NOT) of Coverage Under an NPDES General Permit for Storm Water Discharges Associated with Construction Activity |
| authorized | n of this Notice of Termination constitutes notice that the party identified in Section II of this form is no longer to discharge storm water associated with construction activity under the NPDES program from the site identified in of this form. All necessary information must be included on this form. Refer to the instructions at the end of this form. |
| I. Permit | Information |
| NPDES St | orm Water General Permit Tracking Number: $IDRI0C868$ |
| Reason fo | r Termination (Check only one): |
| Fir | al stabilization has been achieved on all portions of the site for which you are responsible. |
| | other operator has assumed control, according to Appendix G, Section 11.C of the CGP, over all areas of the site that ve not been finally stabilized. |
| | verage under an alternative NPDES permit has been obtained. |
| | r residential construction only, temporary stabilization has been completed and the residence has been transferred to the meowner. |
| II. Opera | tor Information |
| Name: 📐 | AMPA HIGHWAY DISTRICT NO.1 |
| IRS Emplo | yer Identification Number (EIN): $82 - 6000395$ |
| Mailing A | ddress: |
| Street: Z | |
| | |
| E-mail (op | |
| III. Projec | t/Site Information |
| | e Name: NAMPA HIGHWAY DISTRICT NO,1 |
| City: NZ | MPA State: <u>ID</u> Zip Code: 83686 - |
| County or | similar government subdivision: $CANYON$ |
| IV. Certif | ication Information |
| designed to persons wh knowledge | er penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or o manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the f fine and imprisonment for knowing violations. |
| Print Name | E CASEY BEOUEATH |
| Print Title: | |
| Signature: | |
| Date: 06 | 5/10/2011 |
| | |

EPA Form 3510-13 (Rev. 6/03)

Cool Rd. Extension Project Notice of Intent (NOI) – First Page

| This Form Replaces Form 3510-9 (8-98) Refer to the Following Pages for Instructions | 0211 |
|--|------------------------------------|
| United States Environmental Protection Agency | |
| Form Notice of Intent (NOI) for Storm Water Discharges Associated v | with |
| Construction Activity Under an NPDES General Permit | |
| Submission of this Notice of Intent (NOI) constitutes notice that the party identified in Section II of this form requests authoria discharge pursuant to the NPDES Construction General Permit (CGP) permit number identified in Section I of this form. Sub of this NOI also constitutes notice that the party identified in Section II of this form meets the eligibility requirements of the C project identified in Section III of this form. Permit coverage is required prior to commencement of construction activity until y eligible to terminate coverage as detailed in the CGP. To obtain authorization, you must submit a complete and accurate NO Refer to the instructions at the end of this form. | bmission CGP for the you are |
| I. Permit Number | |
| 110R110C11413 | |
| II. Operator Information | |
| Name: NAMPA HIGHWAY DISTRICT NO.1 | |
| IRS Employer Identification Number (EIN): 82 - 6000395 | |
| Mailing Address: | |
| Street 4507 12TH AVE RD | |
| City: NAMPA State: TD Zip Code: 83686 | |
| Phone: 208 - 467 - 6576 Fax (optional): 208 - 467 - 9916 | |
| E-mail (optional): NAMPAHIGHWAY1@NAMPAHIGHWAY1.COM | |
| III. Project/Site Information | |
| Project/Site Name: COOL ROAD EXTENSION FY 2011 | |
| Project Street/Location: COOL ROAD, LOCUST RD SOUTH BM, | |
| city: CALDWELL | |
| County or similar government subdivision: OANYON | |
| Latitude/Longitude (Use one of three possible formats, and specify method) | |
| Latitude 1 | econds) ecimal) |
| Method: U.S.G.S. topographic map EPA web site GPS I Other: GOOGLE MAPS • If you used a U.S.G.S. topographic map, what was the scale: | |
| Project Located in Indian country? Yes INo If so, name of Reservation or if not part of a Reservation, put "Not Applicable": | |
| Estimated Project Start Date: 01/1/201/2011 Estimated Project Completion Date: 05/115/2010 | 011 Year |
| Estimated Area to be Disturbed (to the nearest quarter acre): 5.25 | |
| EPA Form 3510-9 (Rev. 6/03) | |

Cool Rd. Extension Project Notice of Intent (NOI) – Second Page

| IV. SWPPP Information |
|--|
| Has the SWPPP been prepared in advance of filing this NOI? 🗸 Yes 🗌 No |
| |
| Location of SWPPP for viewing: Address in Section II Address in Section III Other SWPPP Street: |
| City: |
| State: Zip Code: |
| SWPPP Contact Information (if different than that in Section II): Name: EDDY THIEL |
| Phone: Fax (optional): |
| |
| V. Discharge Information |
| Identify the name(s) of waterbodies to which you discharge. <u>CARLSON LATERAL CANAL</u> |
| Is this discharge consistent with the assumptions and requirements of applicable EPA approved or established TMDL(s)? |
| VI. Endangered Species Information |
| Under which criterion of the permit have you satisfied your ESA eligibility obligations? |
| • If you select criterion F, provide permit tracking number of operator under which you are certifying eligibility: |
| |
| VII. Certification Information |
| 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. |
| Print Name: ERIC SHANNON |
| Print Title: |
| Signature: ERIC SHANNON |
| Date: <u>11/24/2010</u> |
| |
| |
| |
| |
| |
| EPA Form 3510-9 (Rev. 6/03) |

Request for Change to MS4 Permit – First Page

NAMPA HIGHWAY DISTRICT NO. 1

Commissioners: Bryce D. Millar, Norman C. Rambo, Richard F. Farner

January 12, 2011

United States Environmental Protection Agency Attention: Storm Water Program NPDES Compliance Unit 1200 6th Avenue, suite 900 (OCE-133) Seattle, WA 98101

Subject: Request for Change to Municipal Separate Storm Sewer System (MS4) Permit No. IDS-028142

Dear Environmental Protection Agency:

We hereby request that the Part II.B.6.c requirement be deleted from the subject permit. This requirement reads:

c) Within four years from the effective date of this permit, the permittee must prepare a storm water pollution prevention plan for the permittee's fleet maintenance and equipment site.

Parts I.A and I.B of the permit define the intent of the permit as protecting Waters of the U.S. within the Nampa Urbanized Area.

The Part II.B.6.c requirement is ineffective because our only fleet maintenance and equipment site has no outfalls to Waters of the U.S.; all drainage is retained on site. Also, the site is not located within the Nampa Urbanized Area. Please see the map in Attachment A. As such, the Part II.B.6.c requirement will not provide any protection to Waters of the U.S. within the Nampa Urbanized Area.

The certification statement required by Part VI.E.4 of the permit is shown in Attachment B.

If you have any questions or comments, please contact me at (208) 467-6576 x221, or eric@nampahighway1.com.

Sincerely,

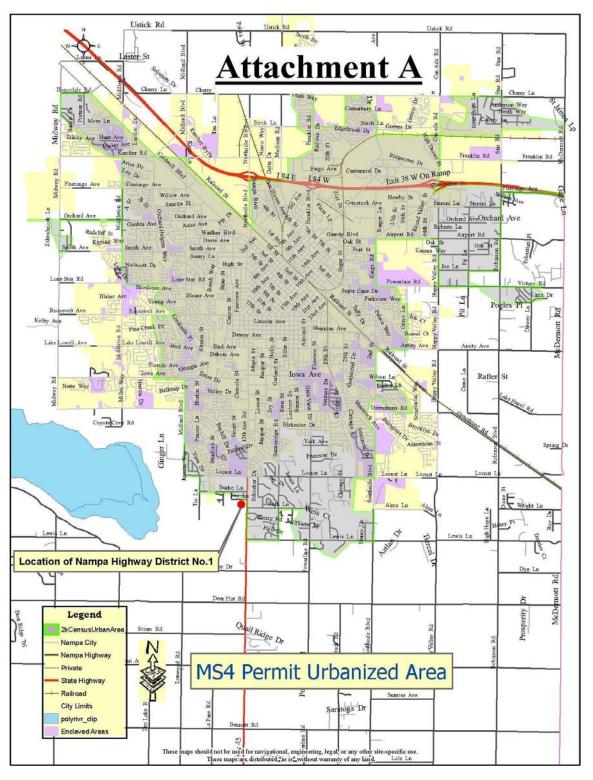
thannes ERIC R. SHANNON, P.E.

4507 12th Avenue Road, Nampa, ID 83686

District Engineer



Phone (208) 467-6576 Fax (208) 467-9916



Request for Change to MS4 Permit – Second Page

Request for Change to MS4 Permit – Third Page

ATTACHMENT B

Certification of Nampa Highway District No. 1 Letter to the U.S. Environmental Protection Agency, dated January 12, 2011, Subject: "Request for Change to Municipal Separate Storm Sewer System (MS4) Permit No. IDS-028142".

CERTIFICATION

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 gather and evaluate 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.

In Casey Bequeath, Director Nampa Highway District No. 1

Jany 12/2011

APPENDIX B

Storm Water Management Program Spreadsheet

Nampa Highway District No. 1 Municipal Separate Storm Sewer System (MS4) Storm Water Management Program

October 2010 to October 2011 Reporting Period (Permit Year 2)

Permit Part IV.C.9 - Recent MS4 System Additions: No additions during this reporting period.

| | Permit Part II.B - Minimum Control Measure | I Requirements | | | | Dormit Dort | Permit Part IV.C - Annual Report Reporting Requirements | | | | | | |
|---------------|--|--|--|--|---|--|---|-------------|---------------------------------------|-------------|---|-------|---|
| Permit | Specific Requirements | Compliance | II.C - Pollutants of | | | | | | | | | | |
| Part No. | specific kequirements | Date | Concern - How Target & Evaluated | II.D - Annual Review | IV.A.2 - Quality Assurance Plan | | Information Results | Inspections | Enforcements | of Products | Activities | BMP's | IV.C.8 - Reliance on Other Parties |
| II.B.1 - Pu | blic Education and Outreach | | | | | | | | | | | | |
| II.B.1.b | Implement a public education program to educate the community about the impacts of storm water discharges on local water bodies and the steps that citizens and businesses can take to reduce pollutants in storm water runoff. Distribute relevant information at least once annually. | 10/14/2011 Implemented 9/22/2011 | Targets: Brochure to identify pollutants of concern, origin, harmfull effects, how to eliminate. Post on web site. Metrics: Number of brochures taken, meeting attendees & feedback comments. | Completed; no changes are requested. | N.A. | Brochure posted on NHD1 Web Site, City of Nampa Web Site; hard copies placed in NHD1 office, Nampa City Hall, Melba City Hall, Melba Senior Citizens Center. Discussion at employee meetings. | None. | None. | None. | See IV.C.1. | As opportunities allow, piggy-back on City of Nampa outreach activities, and distribute brochures at public meetings. | None. | None. |
| II.B.2 - Pu | blic Involvement/Participation | ł | Į | 4 | 4 | | ł | ł | · · · · · · · · · · · · · · · · · · · | | | 1 | |
| | Post all SWMP documents and Annual Reports on the permittee's website. | 10/14/2012 Implemented 9/22/2011 | See II.B.2.c. | Completed; no changes are requested. | N.A. | Annual Report, MSGP NOT, Brochure, MS4 Request for Change | None. | None. | None. | See IV.C.1. | Post future documents as they come available. | None. | None. |
| | Establish appropriate means to provide information and receive input from the public. | 10/14/2011 Implemented 9/22/2011 | Targets: Post target pollutant information on web site. Request specific comments regarding pollutions of concernl. Metrics: Number of brochures taken, meeting attendees & feedback comments. | See II.B.2.b. | N.A. | Web Page with feedback form. | None. | None. | None. | See IV.C.1. | Continually monitor website, receive any comments, and take action(s) as required. | None. | None. |
| II.B.3 - Illi | cit Discharge Detection and Elimination | | | <u> </u> | | <u> </u> | 1 | <u> </u> | <u> </u> | | I | ļ | <u> </u> |
| | Develop, implement and enforce a program to detect and eliminate illicit discharges into the MS4. | 10/14/2012 | Targets: Yet to be developed, but will include visual inspection and sampling. Metrics: To be developed, but will include sample results | Completed; no changes are requested. | Will develop and submit at least 270 days prior to start of monitoring. | Work not yet begun. | None. | None. | None. | None. | Implement controls by 10/14/2012 (see II.C, IV.A.2, IV.C.8). | None. | Will outsource sampling lab work, but don't yet know to whom. |
| II.B.3.c | Adopt an ordinance or other control measure to prohibit illicit discharges to the MS4 (s); prohibit any specific non- storm water discharge, if necessary. | 10/14/2012 | Targets: Will list limits for pollutants of concern. Metrics: To be developed. | See II.B.3.a. | N.A. | See II.B.3.a. | None. | None. | None. | None. | Implement controls by 10/14/2012 (see II.C, IV.C.8). | | If ordinance, must be passed by Canyon County. |

| II.B.3.d | Develop/update a comprehensive storm sewer system map. | 10/14/2012 | Targets: Note significant potential sources of pullutants of concern on map. Metrics: To be developed. | See II.B.3.a. | N.A. | No additional progress this reporting period. | None. | None. | None. | None. | Implement controls by 10/14/2012 (see II.C, IV.C.5). | None. | None. |
|-----------------------|--|--|---|---------------|---------------|--|-------|---|-------|-------------|--|-------|---|
| ll.B.3.e | Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. | 10/14/2012 Implemented 9/22/2012 | See II.B.1. | See II.B.3.a. | N.A. | Web Page, Brochure, Safety Meetings | None. | None. | None. | See IV.C.1. | See II.B.1 | None. | None. |
| II.B.3.f | Begin dry weather screening of outfalls; 20% of outfalls screened for dry weather flows. | 10/14/2012 | See II.B.3.a. | See II.B.3.a. | See II.B.3.a. | See II.B.3.a. | None. | None. | None. | None. | Implement controls by 10/14/2012 (see II.C, IV.A.2, IV.C.8). | None. | Will outsource sampling lab work, but don't yet know to whom. |
| II.B.3.g | Inventory the industrial facilities discharging storm water to the MS4. | 10/14/2012 | Targets: Note significant potential sources of pollutants of concern. Metrics: To be developed. | See II.B.3.a. | N.A. | See II.B.3.a. | None. | None. | None. | None. | Implement controls by 10/14/2012 (see II.C). Piggy-back on City of Nampa | None. | None. |
| | nstruction Site Storm Water Runoff Control | | | 1 1 | | 1 | | - 1 1 | | T | 1 | | 1 |
| II.B.4.a | Develop, implement and enforce a construction site runoff control program for sites disturbing one or more acres of land. | 10/14/2012 | Targets: Will list limits for pollutants of concern, and highlight special BMP's to control them. Metrics: To be developed. | changes are | N.A. | NHD currently require SWPPP, but leaves enforcement to EPA, unless NHD is owner. | None. | Deer Flat - 16 Cool Rd 22 Nampa Booster Station - 6 Nampa School District Sewer & Water - 16 TWTelecom - 4 | None. | None. | Implement controls by 10/14/2012 (see II.C). | None. | None. |
| II.B.4.b | Provide oversight to Highway District contractors regarding the EPA Construction General Permit | Ongoing | See II.B.4.a. | See II.B.4.a. | N.A. | No such projects this reporting period. | None. | None. | None. | None. | Continue oversight as projects occur. | None. | None. |
| II.B.4.c | Adopt an ordinance or other control measure to require construction site operators to practice erosion, sediment and waste control. | 10/14/2012 | See II.B.4.a. | See II.B.4.a. | N.A. | Work not yet begun. | None. | None. | None. | None. | Implement controls by 10/14/2012 (see II.C) | None. | If ordinance, must be passed by Canyon County. |
| II.B.4.d | Distribute written requirements for construction site best management practices for new building and service area | 10/14/2012 | See II.B.4.a. | See II.B.4.a. | N.A. | See II.B.4.c. | None. | None. | None. | None. | Implement controls by | None. | None. |
| II.B.4.e, II.B.4.f | Develop, or review and update as necessary, procedures for reviewing site plans and accepting public comment. | 10/14/2012 | See II.B.4.a. | See II.B.4.a. | N.A. | NHD currently reviews site plans, but no written process for it. Public Comments received via web site. See II.B.4.a project list. | None. | None. | None. | None. | Implement controls by 10/14/2012 (see II.C) | None. | None. |
| II.B.4.g | Implement site inspection & enforcement procedures. Inspect all construction sites >5 acres at least once per construction season. Develop a written policy identifying how construction sites disturbing <5 acres will be prioritized for inspection. | 10/14/2012 | See II.B.4.a. | See II.B.4.a. | N.A. | NHD currently inspects all construction sites. | None. | See II.B.4.a. | None. | None. | Implement controls by 10/14/2012 (see II.C) | None. | None. |

| II.B.4.h | Ensure all permitte-owned construction projects comply with EPA's Construction General Permit. | 10/14/2012 Implemented 10/23/2009 | Target: The ConstructionSourceGeneral Permit targetssediment by requiringimplementation of variousBMP's.Metric: Sedimentcontrol is evaluated byinspection and adjusted asnecessary. | ee II.B.4.a. | N.A. | NHD owned project comply with EPA's Construction General Permit. Filed NOT for Deer Flat (Permit No. IDR10C868) in June 2011. | None. | Approximately 16 construciton SWPPP inspections were conducted on the Deer Flat project, and 22 for Cool Road. | None. | NOT filed for Permit No. IDR10C868 for Deer Flat Rd.; NOI filed for Permit No. IDR10CI43 for Cool Rd. | Will continue to ensure NHD owned projects comply with EPA Construction General Permit. | None. | None. |
|------------|--|---|---|---|---|---|-------|---|-------|--|--|-------|---|
| II.B.5 - P | ost-Construction Storm Water Management in New Developm | ent and Redeve | | | | | | | | | | | |
| II.B.5.a | Develop and implement a program to address post- construction storm water runoff from new development and redevelopment projects. | 10/14/2013 | developed, but will cl | ompleted; no hanges are equested. | Will develop and submit at least 270 days prior to start of monitoring. | l Work not yet begun. | None. | None. | None. | None. | Implement controls by 10/14/2013 (see II.C, IV.A.2, IV.C.8). | None. | Will outsource sampling lab work, but don't yet know to whom. |
| II.B.5.b | Adopt an ordinance to address post-construction runoff from new development and redevelopment projects. | 10/14/2013 | Targets: Will list limits for pollutants of concern. Metrics: To be developed. | See II.B.5.a. | N.A. | See II.B.5.a. | None. | None. | None. | None. | Implement controls by 10/14/2013 (see II.C, IV.C.8). | None. | If ordinance, must be passed by Canyon County. |
| II.B.5.c | Maintain proper long term operation and maintenance of post construction storm water BMPs discharging to the MS4. | 10/14/2014 | See II.B.5.a. | See II.B.5.a. | See II.B.5.a. | See II.B.5.a. | None. | None. | None. | None. | Implement controls by 10/14/2014 (see | None. | None. |
| II.B.5.d | Develop and implement a site plan review process and inspection program to require proper installation and long- term operation and maintenance of post-construction storm water management controls. | 10/14/2014 | Targets: Will list limits for pollutants of concern, and highlight special BMP's to control them. Metrics: To be developed. | See II.B.5.a. | N.A. | See II.B.5.a. | None. | None. | None. | None. | Implement controls by 10/14/2014 (see II.C). | None. | None. |
| II.B.6 - P | ollution Prevention and Good Housekeeping for Municipal Ope | erations | | | | | | | | | | | |
| II.B.6.a | Develop and implement an operation and maintenance program intended to prevent or reduce pollutant runoff from municipal operations. | 10/14/2013 | Targets:Will developCprocedures and use BMP'sclto eliminate discharge ofsediment.Metrics:developed. | - | N.A. | Work not yet begun. | None. | None. | None. | None. | Implement controls by 10/14/2013 (see II.C). Will include a Spill Prevention, Control and | None. | None. |
| II.B.6.b | Develop and conduct appropriate training for municipal personnel. | 10/14/2013 | Targets: Include training on pollutants of concern, sources, effects, and prevention. Metrics: To be developed. | See II.B.6.a. | N.A. | See II.B.6.a. | None. | None. | None. | None. | Implement controls by 10/14/2013 (see II.C). | None. | None. |

| II.B.6.c | Develop SWPPP for Highway District fleet maintenance | 10/14/2013 | See II.D. | Completed; | N.A. | See II.D. | None. | None. | None. | None. | None; see II.D. | None. | None. |
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