

# Permit Appendix B.2

## MS4 Permit Annual Report Form



This Annual Report is due no later than December 1 of each year, beginning in Calendar Year 2021, and reflects the relevant reporting period, beginning in 2020. See Permit Part 6.4.2

Annual Reports and any attachments must be sent to EPA and IDEQ by U.S. Postal Mail to the following addresses:

U.S. EPA, Region 10  
Enforcement and Compliance Assurance Division  
Attn: Surface Water Enforcement Section  
1200 6th Avenue, Suite 155 - Mail Code 20-C04  
Seattle, Washington 98101-3188

Regional Administrator  
Idaho Department of Environmental Quality  
Attn: Water Quality Program  
Boise Regional Office  
1445 N. Orchard St.  
Boise, ID 83706

Complete Sections 1 through IV. Do not leave any questions blank.

<b>MS4 Permittee Name/Organization:</b>	City of Caldwell, Idaho
<b>NPDES Permit Number:</b>	IDS028118

Indicate Annual Report Number & Reporting Period:

- Year 1 Reporting Period:** Dec. 1, 2020 – Sept. 30, 2021 – **Annual Report Due Date:** Dec. 1, 2021
- Year 2 Reporting Period:** Oct. 1, 2021 – Sept. 30, 2022 – **Annual Report Due Date:** Dec. 1, 2022
- Year 3 Reporting Period:** Oct. 1, 2022 – Sept. 30, 2023 – **Annual Report Due Date:** Dec. 1, 2023
- Year 4 Reporting Period:** Oct. 1, 2023 - Sept. 30, 2024 – **Annual Report Due Date:** Dec. 1, 2024
- Year 5 Reporting Period:** Oct. 1, 2024 – Sept. 30, 2025 – **Annual Report Due Date:** Sept. 30 2025
- Other

**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 have no personal knowledge that the information submitted is other than 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."

**Signature:**

<b>Printed Name:</b>	Robb MacDonald
<b>Title:</b>	City Engineer
<b>Date:</b>	11/30/21

Section I. General Information

MS4 Facility Site Name: City of Caldwell MS4

MS4 Facility Organization Formal Name: City of Caldwell

MS4 Facility Contact Name: Ashley Newbry

Title: Assistant City Engineer

MS4 Contact Telephone: 208 455 4672

MS4 Contact Email Address: anewbry@cityofcaldwell.org

MS4 Facility Contact Type (all that apply): [checked] Owner [checked] Operator [checked] Main Contact

MS4 Facility Site Address: 621 Cleveland Blvd.

MS4 Facility Site City, State, Zip Code: Caldwell, ID 83605

MS4 Facility Site Mailing Address: if different from above

Is the MS4 Facility Site Located On Tribal Land? [radio] Yes [radio] No

MS4 Facility Jurisdiction Type (check all that apply):

- checkbox Federal, checkbox State, checkbox College or University, checkbox State Highway Department, checkbox Municipal, checkbox County, checkbox City or Town, checkbox Highway District, checkbox Tribal, checkbox Other

List All Receiving Water(s) For the MS4 Discharges:

Boise River, Mason Creek, Indian Creek

**Section II. Permittee Responsibility:**

Please answer all questions. If the answer is "No," or "Not Applicable" and no other direction is provided, use the Comments field at the end of this section to explain the reason and the expected date(s) that the requirement will be met, and/or to explain why the requirement does not apply.

1. **This Permittee organization shares implementation responsibility for Permit compliance with one or more Permittees.**

Yes       No       Not Applicable

Is the agreement between the Permittees described/cited in the Stormwater Management Program (SWMP) Document?

Yes       No       Not Applicable

2. **This Permittee organization shares implementation responsibility for Permit compliance with one or more outside (non-Permittee) entities.**

Is the agreement with these other entity(ies) described/cited in the SWMP Document?

Yes       No       Not Applicable

3. **This Permittee organization maintains relevant ordinances or other regulatory mechanisms to control pollutant discharges into and from the MS4 to meet the requirements of this GP.**

Yes       No       Not Applicable

(If "No," use the Comment field to specify on overall progress to adopt adequate ordinances or utilizing available regulatory mechanisms.)

4. **This Permittee organization's SWMP Document is posted on a publicly accessible website.**

Yes

Identify the URL for the webpage where the SWMP Document can be accessed:

http://

No

Not Applicable

5. (Year 3 Annual Report only): **This Permittee organization's SWMP Document been updated to describe the implementation of the selected Monitoring/Assessment and/or Pollutant Reduction activities cited in Permit Part 4.**

Yes

Identify the webpage address where the SWMP Document can be accessed:

http://

No

Not Applicable

6. This Permittee organization regularly tracks certain activities to set priorities and assess compliance with the Permit requirements.

- Yes       No       Not Applicable

7. During the reporting period, responsibility for SMWP implementation has changed due to a Transfer of Ownership or Operational Authority over a geographic portion of the MS4.

This Permittee's SWMP Document has been updated to reflect these changes in responsibility for any new or transferred areas served by the MS4.

- Yes

*If yes, use the Comments field to provide a brief statement summarizing the change in ownership or operational authority.*

- No

- Not Applicable

**Section II Comments:**

7. As the portions of the County become annexed into the City each year, the MS4 continues to grow, and the respective jurisdictional area continues to expand. Each year, during preparation for the Annual Report, the Report and SWMP map exhibits are updated to reflect the expanded MS4.

**Section III. Status of SWMP Control Measures**

Please answer all questions for each SWMP control measure and associated component activity. In the Comments field, cite any relevant information and/or statistics that helps illustrate the Permittee's implementation of the required action/activity.

If the answer is "No," use the Comments field to explain the reason, and outline the expected dates that the requirement will be met.

If the requirement does not apply to the Permittee's organization, mark "NA" and explain why it does not apply in the Comments field.

**Public Education, Outreach and Involvement Program (Permit Part 3.1)**

**8. This Permittee organization conducts an education, outreach, and public involvement program based on stormwater issues of significance in the Permittee's jurisdiction.**

- Yes, this organization conducts the education, outreach, and involvement activities required by the Permit
- Yes, this organization works through contract with other entities to conduct the education, outreach, and involvement activities required by the Permit
- No
- Not Applicable

**9. Target Audience: During the reporting period, this Permittee organization focused its education, outreach, and public involvement messages to the following audience(s):**

- General Public** (including homeowners, homeowner's associations, landscapers, and property managers)
- Business/Industrial/Commercial/Institutions** (including home based and mobile businesses)
- Construction/Development** (e.g., Engineers, Contractors, Developers, Landscape Architects, Site Design Professionals)
- Elected Officials, Land Use Policy and Planning Staff**
- Other (describe in Comments section below)

**10. Topics: During the reporting period, this Permittee organization focused its education, outreach, and public involvement messages on the following topics (select all that apply):**

- General impacts of stormwater flows into surface water, and appropriate actions to prevent adverse impacts;
- Impacts from impervious surfaces, techniques to avoid adverse impacts;
- Yard care techniques protective of water quality, such as composting;
- Proper use, application & storage of pesticides, herbicides, and fertilizers;

- Litter & trash control and recycling programs;
- BMPs for power washing, carpet cleaning, auto repair & maintenance;
- Low Impact Development/green infrastructure techniques, including site design, pervious paving, retention of mature trees/vegetation, landscaping and vegetative buffers;
- Maintenance of landscape features providing water quality benefits;
- Stormwater treatment and volume control practices;
- Technical standards for stormwater site plans; including appropriate selection, installation, and use of required construction site control measures
- Source control BMPs and environmental stewardship;
- Impacts of illicit discharges and how to report them;
- Actions and opportunities for pet waste control/disposal,
- Water wise landscaping, water conservation, water efficiency
- BMPs for use and storage of automotive chemicals, hazardous cleaning supplies, vehicle wash soaps and other hazardous materials;

**11. During the reporting period, this Permittee organization began and/or continued distribution of the selected messages/activities to the intended target audience.**

Yes

*Please summarize the message/activity conducted during the reporting period in the Comments section below.*

No

*Note: Permit Part 3.1.3 requires Permittees to conduct at least eight (8) educational messages or activities no later than **September 30, 2025**.*

Not Applicable

**12. During this reporting period, this Permittee organization assessed, or participated in efforts to assess, the understanding and adoption of intended behaviors by the target audience.**

Yes; *In the Comments section below, please summarize efforts to assess the selected education, outreach and public involvement activities conducted during the reporting period. If information is available, describe how this information is used to improve the education/outreach efforts.*

No

Not Applicable

13. During this reporting period, this Permittee organization offered (or worked with others to offer) training/education regarding construction site runoff control measures to site operators working in the Permittee's jurisdiction.

- Yes
- No

Note: Permit Part 3.1.7.1 requires Permittees to offer outreach/training on construction site control measures at least twice during the permit term, no later than **September 30, 2025**.

Not Applicable

14. During this reporting period, this Permittee organization offered (or worked with others to offer) training/education regarding permanent stormwater controls to audiences working in the Permittee's jurisdiction.

- Yes
- No

Note: Permit Part 3.1.7.2 requires Permittees to offer outreach/training on permanent stormwater controls at least twice during the permit term, no later than **September 30, 2025**.

Not Applicable

15. This Permittee organization maintains and promotes a publicly-accessible website that provides current SWMP-related information cited in Permit Part 3.1.8. This website was recently updated prior to submitting this Report.

- Yes

URL for the Permittee's webpage:

http://

- No
- Not Applicable

**Comments on Public Education, Outreach, and Involvement Program:**

Use this Comments field to explain or discuss unique implementation schedules, summarize nature of the education, outreach, and public involvement activities conducted during the reporting period

11. City of Caldwell is a partner with City of Boise and its co-permittees, as a part of the Partners for Clean Water organization. Due to pandemic restrictions this year, our outreach efforts were limited to supporting this organization financially to fund bus wraps, radio advertisements, and billboards which span Ada and Canyon counties. City of Caldwell staff also participated in Caldwell Community Pride Day (landscape repair and litter cleanup) and City of Boise's Watershed Watch (Hands-on Water Quality training for Middle School students) in 2021.

12. City of Caldwell participated in Partners for Clean Water discussions and has expressed desire for the team to redirect its emphasis on picking up pet waste, toward reduction and elimination of illicit discharges. Nearly all team members were able to comment that they had been reached by the Partners for Clean Water advertisements in their personal lives, therefore the outreach methods selected seem to be effective at reaching the public. City of Caldwell repeatedly emphasizes the need for campaign efforts to span Ada and Canyon counties. We have greatly appreciated the electronic methods of outreach, and would support social media advertising being added to the existing campaign.

**Illicit Discharge Detection and Elimination Program (Permit Part 3.2)**

16. To the extent allowable pursuant to authority granted under Idaho law, this Permittee organization conducts and enforces a program to detect and eliminate illicit discharges into the MS4.

Yes

No

*Note: Permit Part 3.2 requires Permittees to revise and update their existing programs as necessary to comply with Permit Parts 3.2.2 through 3.2.9 no later than **April 3, 2025**.*

Not Applicable

17. This Permittee organization maintains a current MS4 Map and Outfall Inventory as described in Permit Part 3.2.2.

Yes

No

*Note: Permit Part 3.2 requires Permittees to update their Map(s) and Inventory no later than **April 3, 2025**.*

Not Applicable

18. To the extent allowable pursuant to authority granted under Idaho law, this Permittee organization prohibits non-storm water discharges into the MS4 (except those identified in Permit Part 2.4) through an ordinance or other regulatory mechanism.

Yes – if yes, please provide citation/web address to the ordinance/regulatory mechanism:

[https://codelibrary.amlegal.com/codes/caldwellid/latest/caldwell\\_id/0-0-0-20260](https://codelibrary.amlegal.com/codes/caldwellid/latest/caldwell_id/0-0-0-20260)

No

*Note: Permit Part 3.2 requires Permittees to revise and update their existing programs as necessary no later than **April 3, 2025**.*

Not Applicable

19. This Permittee organization maintains a dedicated telephone number, email address, and/or other means for the public to report illicit discharges,

Yes – if yes, please provide phone number/web address:

<https://www.cityofcaldwell.org/departments/engineering/storm-water#ad-image-1>

No

*Note: Permit Part 3.2 requires Permittees to revise and update their existing programs as necessary no later than **April 3, 2025**.*

Not Applicable



20. This Permittee organization responds and investigates illicit discharge complaints or reports within two working days.

Yes

No

Note: Permit Part 3.2 requires Permittees to revise and update their existing programs as necessary no later than **April 3, 2025**.

Not Applicable

21. Number of Public Complaints/Reports Received During this Reporting Period:

16

22. Number of Illicit Discharge Complaints/Reports Investigated through field visits, sampling or other follow-up action

16

23. Number of Illicit Discharge Complaints/Reports Resolved

16

24. This Permittee organization conducts a dry weather analytical and field screening monitoring program to identify non-stormwater flows from MS4 outfalls.

Yes

No

Not Applicable

25. During the reporting period, this Permittee organization used its written protocols to prioritize and identify MS4 outfalls for dry weather discharge investigation.

Yes

No

Not Applicable

26. Total Number of MS4 Outfalls in the Permittee's jurisdiction of the Permit Area:

272

27. During the reporting period, this Permittee organization completed visual dry weather screening on at least 50 MS4 outfalls.

Yes

No – Total # of outfalls screened in this jurisdiction was less than 50

Not Applicable

28. Of the 50 outfalls screened during the reporting period:

How many outfalls were discharging during dry weather?

50

How many of these identified dry weather discharges were sampled or otherwise investigated to determine the discharge source?

9

How many of the identified dry weather discharges resulted in the Permittee action to address and eliminate the discharge source?

0

29. During this reporting period, how many of the Permittee’s MS4 outfalls have been identified as having dry weather flows caused by irrigation return flow or ground water seepage?

Number of outfalls identified this reporting period

273

Total number of MS4 outfalls identified to date, as having dry weather flows from irrigation or groundwater seepage

48

Note: Permit Part 3.2.6 requires Permittees to provide a complete list of MS4 outfalls locations identified as having dry weather flows caused by irrigation return flow or ground water seepage as part of the Permit Renewal Application no later than April 3, 2025.

30. This Permittee organization maintains written spill response procedures and coordinates appropriate spill prevention, containment and response activities with other organizations in the Permit Area to ensure maximum water quality protection at all times.

- Yes No Not Applicable

31. This Permittee organization coordinates with appropriate local entities to educate employees and the public of the proper management and disposal or recycling of used oil, vehicle fluids, toxic materials, and other household hazardous wastes.

- Yes No Not Applicable

32. This Permittee organization’s staff responsible for investigating, identifying and eliminating illicit discharges, spills, and illicit connections into the MS4 are trained to conduct such activities

- Yes No Not Applicable

Comments on Illicit Discharge Detection and Elimination Program:

Use this Comments field to explain any unique implementation schedules, highlight investigation results or follow-up actions, discuss subsequent enforcement actions, etc. that were conducted during the relevant reporting period.

21-23. These do not include Construction site related complaints and inspections. (This section IDDE only.)
25. Written prioritization protocols have not yet been formally developed into the SWMP, but Dry Weather Outfall screening was performed in 2021. Prioritization for inspection is presently based on the last date since an inspection was conducted.

**Construction Site Runoff Control Program (Permit Part 3.3)**

33. This Permittee organization uses an ordinance or other regulatory mechanism to require erosion, sediment, and waste material management controls at construction project site activity that results in land disturbance of one (1) or more acres and discharges to the MS4.

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2025**.*

Not Applicable

34. This Permittee organization requires construction site operators to submit construction site plans for projects disturbing one (1) or more acres for Permittee review.

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2025**.*

Not Applicable

35. This Permittee organization inspects construction sites that disturb one (1) or more acres to ensure compliance with applicable requirements for erosion, sediment and waste material management controls.

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2025**.*

Not Applicable

36. This Permittee organization inspects construction sites using an inspection prioritization system.

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2025**.*

Not Applicable

37. This Permittee organization implements a written escalating enforcement response policy or plan (ERP) for construction site runoff control.

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2025**.*

Not Applicable

38. This Permittee organization ensures that all persons responsible for preconstruction site plan review, site inspections, and enforcement of construction site runoff control requirements are appropriately trained to conduct such activities – specifically, this organization provides orientation and training for new staff working on construction runoff control issues within the first six (6) months of employment.

Yes

No

*Note: Permit Part 3.3 requires Permittees to update their construction site runoff control requirements no later than **April 3, 2025**.*

Not Applicable

**Comments on Construction Site Runoff Control:**

*Use this Comments field to explain unique implementation schedules, summarize the number of site inspections, follow-up actions, and/or any subsequent enforcement actions, etc that were conducted during the relevant reporting period.*

33. At the site work design phase, as a part of (Engineering's) plan review: developments larger than 1 acre are presently required to share a copy of their SWPPP with the City. Commercial developments are required to supply an erosion and sediment control sheet in their plan set. Per City ordinance, sites larger than 1 acre are required to get an erosion and sediment control permit. Per City ordinance, developments smaller than 1 acre are not are not required to get an erosion and sediment control permit. These smaller sites can still be subject to City ESC inspection by prioritization (or complaint), and they are expected to follow ordinance by using ESC BMP's and utilize control mechanisms. (Ord. 04-19-11) On that note, our erosion and sediment control \*permit\* program is a work-in-progress. We do not presently have the necessary staff to run the formal ESC permit program as it is written in our ordinance. Additional staff are budgeted for FY2023.

37. Although some mechanisms are in place for enforcement, we believe that further improvements to our ordinance are needed to make each "escalating" step clearer to enact. (See Caldwell Ordinance 04-19-15, which is relatively brief.)

**Post Construction Stormwater Management in New Development & Redevelopment (Permit Part 3.4)**

39. Through ordinance or other regulatory mechanism, this Permittee organization requires the installation and long-term maintenance of permanent stormwater controls at new development and redevelopment project sites that result from land disturbance greater than or equal to 1 acre and that discharges to the MS4.

The required stormwater controls must be sufficient to retain onsite the runoff volume produced from a 24-hour 95<sup>th</sup> percentile storm event, and/or require runoff treatment sufficient to attain an equal or greater level of water quality benefit as this onsite retention standard.

Yes

Please cite to the ordinance containing the permanent stormwater control requirements:

No

See comments

Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2025**.

Not Applicable

40. This Permittee organization requires permanent storm water controls through written specifications.

Yes

Please cite to the document containing the permanent stormwater control requirements:

No

Caldwell Municipal Stormwater Management Manual

Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2025**.

Not Applicable

41. This Permittee organization requires preconstruction site plan review and approval for permanent storm water controls at new development and redevelopment sites that result in land disturbance of one or more acres and discharge to the MS4.

Yes

No

Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2025**.

Not Applicable

42. This Permittee organization has identified high priority locations in the jurisdiction where the Permittee regularly inspects the installation, and long-term operation, of permanent stormwater controls.

Yes

No

*Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2025**.*

Not Applicable

43. This Permittee organization has an enforcement strategy to ensure and maintain the functional integrity of permanent stormwater controls within this jurisdiction.

Yes

No

*Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2025**.*

Not Applicable

44. This Permittee organization uses a database inventory to track and manage the operational condition of permanent stormwater controls within this jurisdiction.

Yes

No

*Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2025**.*

Not Applicable

45. This Permittee organization requires enforceable and transferable O&M Agreements, where parties other than this Permittee organization are responsible for operation and maintenance of permanent storm water controls?

Yes

No - *Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2025**.*

Not Applicable

46. This Permittee organization ensures that all persons responsible for reviewing site plans for permanent stormwater controls and/or for inspecting the installation and operation of permanent controls are trained to conduct such activities

Yes

No - *Note: Permit Part 3.4 requires Permittees to update their permanent stormwater control requirements no later than **April 3, 2025**.*

Not Applicable

**Comments on Post Construction Stormwater Management in New Development and Redevelopment**

Use this Comments field as necessary to explain any unique implementation schedules, summarize inspections, actions, etc. that were conducted during the relevant reporting period.

39. This performance standard is not yet in place. We have performed research and calculations to estimate the 95 percentile 24 hour event to be 0.61" in Caldwell, ID. At present, our design requirements are dependent on each particular site's proximity to an available drain (agricultural drain). Sites which are able to access (overflow to) a drain must provide storage capacity for the maximum 25 year event, using Caldwell's IDF table. Of these, the first 0.20" must be contained within the facility, before the facility can overflow to the nearest drain. Sites which are not able to access (overflow to) a drain must provide storage capacity for the maximum 100 year event, using Caldwell's IDF table. All flow is contained within the facility.

42. The program to execute prioritization and inspection of permanent stormwater controls is not yet set up.

43. Yes, maintenance of permanent stormwater controls is required by City ordinance 13-01-05(3).

44. An inventory of permanent stormwater controls can be created using GIS data, but as mentioned in question 42, this program has not yet been set up.

45. At present, the City has a few mechanisms staged to facilitate maintenance of privately-owned stormwater infrastructure.

- City Ordinance (See City Ordinance 13-01-03(8); 13-01-05(1)(B); 13-01-05(3))
- Stormwater Management Manual (Policy)
- Order of Decision (Development Agreement with Developer)
- Final Plat of a Development (Plat Notes include requirement for HOA to maintain all common lots that they own.)

**Pollution Prevention/Good Housekeeping for MS4 Operations (Permit Part 3.5)**

**47. This Permittee organization inspects all MS4 catch basins and inlets in the jurisdiction at least once every five years and takes appropriate maintenance or cleaning action based on those inspections.**

- Yes
- No – Permittee uses an alternate inspection & maintenance schedule as outlined in the SWMP Document.
- No

*Note: Permit Part 3.5 requires Permittees to update their pollution prevention and good housekeeping as needed to properly operate and maintain their MS4s no later than **April 3, 2025**.*

Not Applicable

**Total Number of catch basins and inlets inspected this reporting period**

472.0
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**48. This Permittee organization operates and maintains Streets, Roads, Highways and/or Parking Lots in its jurisdiction in a manner that protects water quality and reduces the discharge of pollutants through the MS4.**

- Yes
- No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2025**.*

Not Applicable

**49. This Permittee organization operates all street/road maintenance material storage locations in a manner that prevents pollutants in stormwater runoff from discharging to the MS4 or into any receiving waterbody. A description of each Material Storage Location is included in the SWMP Document, as required by Permit Part 3.5.4**

- Yes
- No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2025**.*

Not Applicable



50. This Permittee organization sweeps all areas of the jurisdiction that discharge to the MS4 at least once annually. A description of the street sweeping program, as required by Permit Part 3.5.5, is included in the SWMP Document.

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2025**.*

Not Applicable

51. This Permittee organization has reviewed its operation and maintenance activities for the types of activities listed below and confirms that all such activities are conducted in a manner that protects water quality and reduces the discharge of pollutants through the MS4. Municipal Activities to be addressed include: *grounds/park and open space maintenance operations; fleet maintenance and vehicle washing operations; building maintenance; snow disposal site operation and maintenance; solid waste transfer activities; municipal golf course maintenance; materials storage; hazardous materials storage; used oil recycling; and spill control and prevention measures for municipal refueling facilities.*

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2025**.*

Not Applicable

52. This Permittee organization ensures appropriate practices to reduce the discharge of pollutants to the MS4 associated with the application, storage and disposal of pesticides, herbicides and fertilizers. All employees or contractors applying pesticides, etc. are instructed to follow all label requirements, including those regarding application methods, rates, number of applications allowed, and disposal of the pesticide/herbicide/fertilizer and rinsate.

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2025**.*

Not Applicable

53. **This Permittee organization uses site specific Storm Water Pollution Prevention Plans for all Permittee-owned material storage facilities, heavy equipment storage areas, and maintenance yards located in the Permit Area.**

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2025**.*

Not Applicable

54. **This Permittee organization ensures that all persons responsible for municipal operations and maintenance activities are trained to conduct such activities**

Yes

No

*Note: Permit Part 3.5 requires Permittees to update their requirements pollution prevention/good housekeeping for MS4 Operations no later than **April 3, 2025**.*

Not Applicable

**Comments on Pollution Prevention/Good Housekeeping for MS4 Operations**

*Use this Comments field as necessary to explain any unique implementation schedules, summarize inspections, actions, etc. that were conducted during the relevant reporting period*

47. The current number of catch basins in the City is 3,950. In order to clean every catch basin in a 5-year term, City staff must clean out 790 catch basins per year. Based on historic data, it appears that that is not quite occurring, on average at present, but we're close. With the exception of 2017 (heavy water year), our average CB-clean out rate is 747 CB's each year, or each CB is cleaned every 5.3 years. We believe it is within our capacity to achieve the goal of inspecting and/or cleaning 790 catch basins per year, but our preference is to institute a cleaning prioritization whereby some catch basins are cleaned more frequently than others. During the permit term would like to create alternate inspection and maintenance schedule, and outline the procedure in a future copy of the SWMP Document.

48. In winter months, we utilize sand and plowing to improve traction and clear snow from the roadway. The City does not use salt or deicer, due to the likelihood of it entering the MS4. We do not have designated snow disposal locations. Snow is typically allowed to melt into the local part of the MS4 where it was deposited. At the Street Department, sand and other chemicals are stored under cover to prevent runoff/runoff action. In the spring, street sweepers collect the sand from the roadway.

49. A list and description of each of the City's material storage areas are listed in the SWMP document.

50. This item is not yet incorporated into the SWMP document. Only a brief description of the existing street sweeping program is included in the SWMP at present.

51. This description is incomplete in the SWMP at present. Stormwater inspection staff need to perform inspections of each of these facilities during this permit term to ensure that the content is current. To the best of our knowledge, operation and maintenance activities are conducted in a manner that protects water quality and minimizes discharge of pollutants to the MS4.

53. As discussed in the SWMP, City stormwater staff will draft and implement SWPPPs for Street Department, Parks Department, and the Gravel Pit operations. This item is incomplete at present.

**Section IV. SPECIAL CONDITIONS FOR DISCHARGES TO IMPAIRED WATERS**  
**Provide a current status report regarding the development of any required**  
**Monitoring/Assessment Plan and implementation of pollutant reduction activities as**  
**required by Permit Part 4.**

**55. Permit Part 4 - Narrative Status Report:**

Monitoring/Assessment Plan:

We appreciated the simplicity and straightforward nature of the monitoring program required by our 2009-2019 MS4 permit. Though our vision is still in its infancy, or preliminary planning phase, our desire is to create a quarterly monitoring program which includes sampling locations which are reflective of the City's discharges to the impaired waters listed in our permit: Indian Creek, Mason Creek, Boise River. We want it to significantly mirror the previous sampling protocol.

In the past, some of the sampling locations selected were less than ideal, including one location that commingles with runoff from Interstate 84, and another location with on-site storage capacity (rarely discharges). Our future intent is to select locations which are better indicative of discharge from sites managed by the City of Caldwell only.

Draft of a QAPP and Monitoring Plan is incomplete, but must be submitted to DEQ by 10/1/2022.

Implementation of Pollutant Reduction Activities:

During the report term, the City of Caldwell submitted a scope of pollutant reduction activities, a permit revision. The revision was accepted by US EPA for inclusion into our MS4 permit. Our proposal was two-fold in nature: (1) Expand Wash Rack to Improve Sediment Removal Program Efficiency and (2) Microbial Source Tracking Study Phase 2 - Identify and Remove Intermittent eColi Bacteria.

(1) The City of Caldwell is working with LiGo staff to install tracking devices on specific fleet vehicles to quantify trips to the wash rack. Approximately half of these installs have been completed.

(2) Collection of MST samples has concluded and EPA's Manchester lab provided the results to the City for analysis. City staffing resources have been insufficient for us to thoroughly sort through the data thus far.

## Section V. Response To Excursions Above Idaho Water Quality Standards

56. During this or any prior reporting period, did the Permittee submit written notification to EPA and IDEQ regarding MS4 discharge that are causing or contributing to an excursion above the WQS as directed by Permit Part 5.1?
- Yes – if yes, proceed to Q.56
- No
- Not Applicable
57. During this or any prior reporting period, did the Permittee submit an Adaptive Management Report to EPA and IDEQ, as directed by Permit Part 5.2?
- Yes – if yes, proceed to Q.57
- No
- Not Applicable
58. Provide a summary of the Permittee's efforts to date that address the MS4 discharges contributing to the original water quality excursion, including the results of any monitoring, assessment, or evaluation efforts conducted during the reporting period.

During this permit term, we had two MS4 discharges that contributed to the original water quality excursions.

\*\*\*Incident 1: February 9, 2021. We are including a summary of the non-compliance report below.

The following report is written in regard to a non-compliance discovered on 11 AM on February 4, 2021 in connection with the City of Caldwell's MS4 Permit, IDS028118 Section 7.9.1. On February 2, 2021 at approximately 12:30 PM, the Caldwell Street Department Superintendent called the City Engineering Department (CED) to make a complaint about the stormwater management for a construction site located at the corner of 21st Ave and Chicago Street. [...] At 2 PM that day, CED representatives found that trench dewatering was being discharged to the City storm drain system. The discharge was opaque and turbid with sediment. After speaking with the excavation subcontractor and confirming with staff at the CED, it was concluded that the subcontractor, Larson Guth, had not obtained permission to dewater to the City storm drain. [...] The general contractor, Cameron Construction (CGP ID IDR1002V9)... [...] Late morning of February 4, 2021, Ashley again visited the site to meet Jacob, representing the general contractor Cameron Construction. She explained that the City has a permit with EPA for our MS4 program, and we could not allow the dirty water to be pumped into our storm drain. [...] After this, Emily and Ashley drove to the City's ponds to observe the contents. We soon found that [...] They had overflowed through the orifice diversion structure and begun discharging to a pipe tributary to Indian Creek.

/// The overflow water was sampled and the non-compliance was reported to DEQ and EPA within 24 hours.

[Analytical Laboratories, Inc. 2/4/2021 12:30 PM collection; Escherichia coli 260 MPN/100 mL; TN 6.38 mg/L; TP 0.98 mg/L; TSS 128 mg/L]

\*\*\*Incident 2: October 21, 2021. Period of NC: (Truck leak - 15 minutes approx) @ 2:45 PM on 10/21/2021

Location: Alley SSMH on 16th Ave, between Blaine & Cleveland in Caldwell Receiving Water: 1st to MS4, then Indian Creek Appx Volume: 200 gal sewer water w/o solids, then diluted with 2000 gal potable water Description: I learned about this spill from the collections vactor on 10/22/2021 at 4:00 PM. The spill occurred the previous day on 10/21/2021 at approximately 2:45 PM. At the time of the spill, a sewer collections system operator inadvertently left a latch on the vactor tank open while cleaning a line. Upon noticing that the spill had occurred, the operator panicked and diluted the spill with approximately 2000 gallons clean water. Prior to being notified, Ashley had knowledge of the quantity of precipitation on 10/22/2021. Approximately 0.09" of precipitation fell in Caldwell between the time of the spill (and dilution activity) and the time of discovery by MS4 staff. Another 0.08" fell during the discovery discussion until 5 PM on 10/22/2021. Due to the quantity of dilution water and precipitation, we anticipate that the quantity may have been sufficient for each Indian Creek. The MS4 is tributary to Indian Creek at this location. Steps to Prevent: Follow up training on MS4 spills for collections staff scheduled for 10/28/2021, and The City of Caldwell collections team will add the inspection of the latch to the SOP for daily truck inspection prior to heading to the street.

**59. List any attachments submitted as part of this Annual Report:**

- A. City of Caldwell NPDES MS4 Permit
- B. City of Caldwell Pollutant Reduction Activities Proposal
- C. City of Caldwell MS4 Map - Dec 2021
- D. 2021 Staff Training Events
- E. Inspections (Dry Weather Flows, Construction Sites, IDDE) - available upon request
- F. Community Outreach Exhibits - available upon request