

## NOTICE OF MEETING NPDES TECHNICAL ADVISORY COMMITTEE (TAC)

**TUESDAY, JULY 15, 2014 – 10 AM to NOON**  
**SAN MATEO MAIN LIBRARY, OAK ROOM**  
**55 WEST THIRD AVENUE, SAN MATEO**  
**(See location map on back)**

### AGENDA

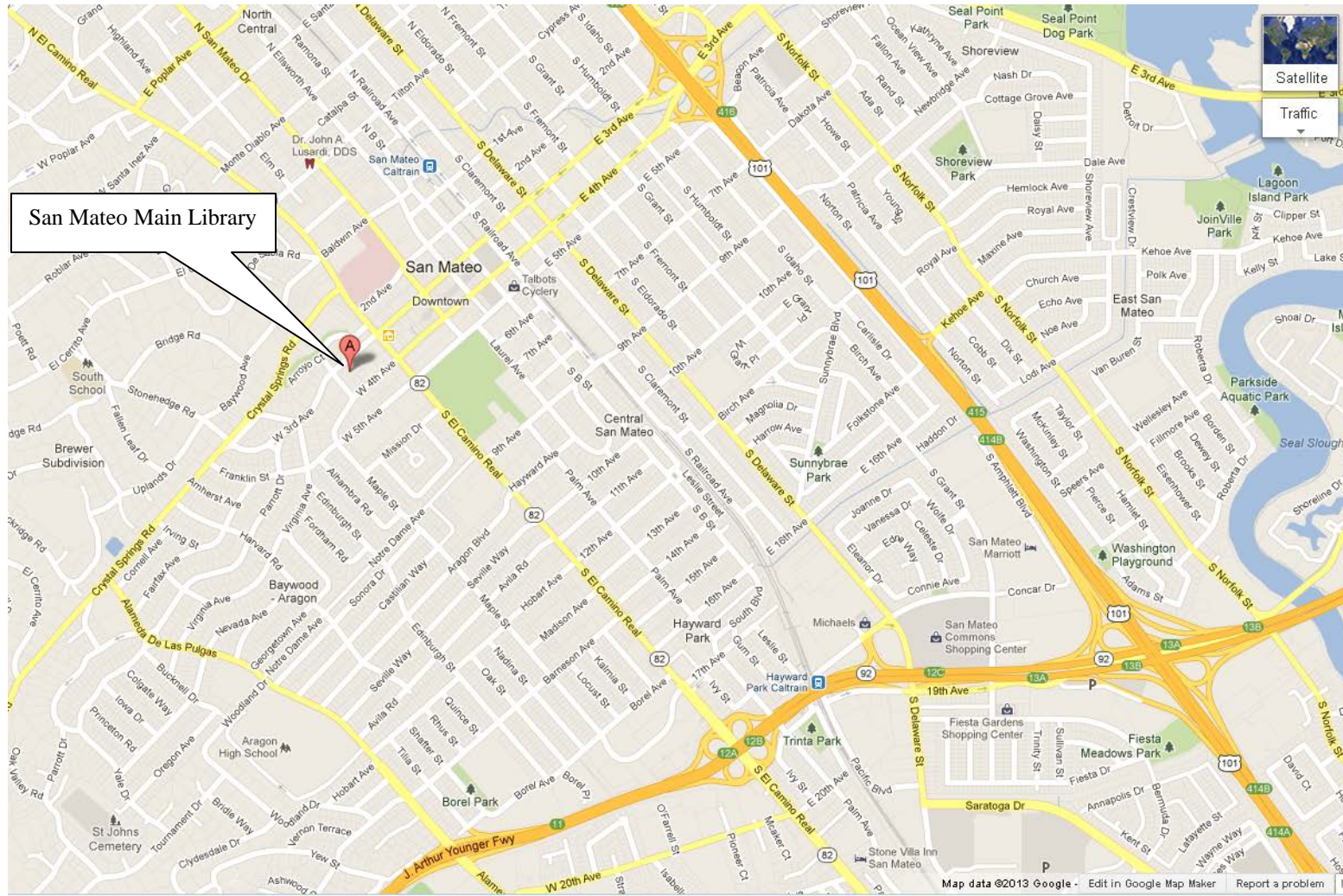
1. **INTRODUCTIONS, ANNOUNCEMENTS, AGENDA REVISIONS – MATT FABRY, Countywide Program Coordinator**
2. **PUBLIC COMMENT ON ITEMS NOT ON THE AGENDA** (limited to two minutes per speaker)
3. **APPROVAL OF MINUTES FROM PREVIOUS MEETING**
4. **REGULAR AGENDA**
  - A. **INFORMATION – ANNUAL REPORTING PROCESS/SCHEDULE (JON KONNAN, EOA)**
  - B. **INFORMATION – UPDATE ON POTENTIAL COUNTYWIDE FUNDING INITIATIVE (FABRY)**
  - C. **INFORMATION – UPDATE ON PCBS/MERCURY PLANNING AND DATA COLLECTION (KONNAN)**
  - D. **INFORMATION – UPDATE ON POTENTIAL CHANGES TO MRP POTABLE WATER DISCHARGE PERMITTING (FABRY/KONNAN)**
  - E. **INFORMATION – MRP COMPLIANCE OVERVIEW/QUARTERLY CHECK-IN (KONNAN)**
  - F. **INFORMATION – OTHER ISSUES, SUBCOMMITTEE UPDATES**
5. **NEXT MEETING – October 21, 2014**

Post by 5:00 P.M., Friday, July 11, 2014

**NOTE: Persons with disabilities who require auxiliary aids or services in attending and participating in this meeting should contact Matthew Fabry at 650-599-1419, five working days prior to the meeting date.**

Public records that relate to any item on the agenda for a regular NPDES Technical Advisory Committee (TAC) meeting are available for public inspection. Those records that are distributed less than 72 hours prior to the meeting are available for public inspection at the same time they are distributed to all members, or a majority of the members of the TAC. The TAC has designated C/CAG's office at 555 County Center, 4th Floor, Redwood City, for purpose of making those public records available for inspection. The documents are also available on the Countywide Program's website at [www.flowstobay.org](http://www.flowstobay.org), and C/CAG's website, at the link for agendas for upcoming meetings. The website is: <http://www.ccag.ca.gov>.

**MEETING LOCATION**  
**San Mateo Main Library, Oak Room, 55 West Third Avenue, San Mateo**  
**(PARK IN LIBRARY'S UNDERGROUND GARAGE)**



## **NPDES Technical Advisory Committee Agenda Report**

**Date:** July 15, 2014  
**Item:** 3  
**From:** Matthew Fabry, Program Coordinator  
**Subject:** Approval – NPDES TAC meeting minutes – April 15, 2014

### Summary

The attached minutes were recorded from notes taken at the subject meeting.

### Recommendation

Approve April 15, 2014 NPDES Technical Advisory Committee meeting minutes as drafted.

### Attachments

Draft April 15, 2014 Minutes

**NPDES Stormwater  
Technical Advisory Committee (TAC)  
REPORT OF MEETING**

**TUESDAY, APRIL 15, 2014  
10:00 to NOON  
CITY OF SAN MATEO**

**1. INTRODUCTIONS, ANNOUNCEMENTS, AGENDA REVISIONS:** Self-introductions were made. Announcements included: 1) Matt Fabry reported that BASMAA will likely collaborate with the San Francisco Estuary Partnership and the San Francisco Estuary Institute (SFEP/SFEI) to prepare a concept proposal for an EPA Water Quality Improvement Fund planning/policy grant to seek funding for green infrastructure master planning. 2) City of San Mateo is hiring a Deputy Public Works Director and an inspector. 3) Please let Matt Fabry know who the appropriate contacts are for the California Stormwater Quality Association (CASQA) membership and Construction Best Management Practices (BMP) web portal subscription. 4) The statewide Industrial Activities Stormwater General Permit was adopted by the State Water Board. CASQA will be developing a training program and updated BMP handbook/portal. 5) Jon Konnan noted the Integrated Monitoring Report was finalized and will be posted on SMCWPPP's website ([www.flowstobay.org](http://www.flowstobay.org)).

**2. PUBLIC COMMENT ON ITEMS NOT ON THE AGENDA:** None.

**3. APPROVAL OF MINUTES FROM PREVIOUS MEETING -** The January minutes were adopted as written.

**4. REGULAR AGENDA**

**A. INFORMATION – MUNICIPAL REGIONAL PERMIT REISSUANCE:**

Matt provided an update on the ongoing process for the Regional Water Board to reissue the Municipal Regional Permit (MRP). The MRP 2.0 Steering Committee that has been convened through the Bay Area Stormwater Management Agencies Association is discussing high priority reissuance issues. Outgrowths of the Steering Committee include Green Street and Pollutants of Concern workgroups. The highest priority provisions include C.3 (new and redevelopment), C.8 (monitoring), C.10 (trash), and C.11/12 (mercury & PCBs). Permittees should let staff know if there are high cost/low benefit items in permit that could be changed. Are reporting provisions onerous and seem to have little value? Any recommended revisions should include alternative approaches, per Regional Board staff request.

Jon Konnan reviewed the draft MRP renewal table and Report of Waste Discharge (ROWD) process/timeline. The package of materials will be sent out to municipalities in mid-May for review, including:

- 1) ROWD Form
- 2) Renewal table with prioritized issues and recommendations
- 3) CD with documents referenced in renewal table.

The ROWD permit renewal application is due to the Regional Water Board on June 2.

**B. INFORMATION – UPDATE ON POTENTIAL COUNTYWIDE FUNDING INITIATIVE:** Matt provided an update on overall progress and the schedule. Enabling legislation for C/CAG to propose a special tax or fee is not signed yet but is out of Assembly committee and may go back to the Assembly floor next week.

Matt will email the TAC the third draft of the needs analysis report by EOA (and a summary of changes since the second draft) and the draft funding options evaluation by SCI which details the various available options for funding the different compliance activities mandated in the MRP. Public opinion research mailed survey went out in late March and is due April 24. The consultant team has been authorized to initiate preliminary public outreach efforts, with the remainder to be implemented if a funding initiative is authorized by the C/CAG Board. Outreach tools will include e-newsletters, social media including Facebook and Twitter, and an Action Plan that will detail in plain language how funding under a successful initiative would be utilized, including translating the highly prescriptive and technical details of activities required by the MRP into terms understandable by the general public. There are many tasks still to be completed and the likelihood of a fall initiative is uncertain.

**C. INFORMATION – MERCURY & PCBs PLANNING PROCESS/WORKGROUP** - Bonnie de Berry (EOA, Inc.) gave an overview on this topic. Regional Water Board staff requested stormwater agencies gather more information over the next 15 months about PCBs and mercury in the Bay Area to inform the next permit. This information would lead to better focused permit requirements for Permittees. Regional Water Board staff requested three general types of information: 1) Pilot Watersheds – develop plans for future implementation of control measures in current pilot watersheds, including the Pulgas Creek pump station watershed in San Carlos (preliminary plan by June 2014, final by December 2014); 2) Additional High Opportunity Areas – identify additional high opportunity areas (primarily within old industrial land uses) where focused control measure implementation could occur during MRP 2.0 (preliminary list by June 2014 and refined list by December 2014 and complete initial implementation planning by June 2015); and 3) Moderate Opportunity Areas – identify moderate opportunity areas (primarily within old industrial and other old urban land uses except residential) where additional POC load reductions could be achieved opportunistically as the land area is potentially redeveloped and retrofitted with Green Streets (preliminary list by June 2014 and refined list by December 2014 and complete initial implementation planning by June 2015).

High and moderate opportunity areas will be identified using a process with similarities to that used recently for trash generation areas: 1) preliminary source area maps will be developed using GIS data (e.g., old industrial land uses, pre-1978 facility construction, known pollutant release sites); 2) Permittees will verify maps following a guidance document (e.g., field visits, Google Street View, local knowledge); 3) urban sediments will be collected near source areas and analyzed for PCBs and mercury; and 4) opportunity area maps will be refined based on Permittee verification and sample results. The field sampling will be the most expensive part of this process and won't start until next fiscal year. Permittees with substantial old industrial acreage will likely be the most involved with the above tasks. SMCWPPP would like to establish a workgroup of staff from appropriate Permittees with substantial old industrial acreage to work with SMCWPPP Program staff in implementing the above process. As an initial step, Program staff will distribute a draft workplan to the workgroup.

Jon Konnan noted that going after “low hanging fruit” via addressing high opportunity areas would only put a small dent in the problem and thus the need to opportunistically address moderate opportunity areas via Green Street retrofit projects that provide the opportunity for integration of pollutant of concern load reductions with other drivers and funding sources (e.g., transportation projects).

#### **D. INFORMATION – UPDATE ON REGIONAL POTABLE WATER DISCHARGE PERMIT**

Jon and Matt provided a summary of the proposed regional potable water discharge permit, including:

- Only affect municipalities that are water purveyors (about half of the agencies in San Mateo County).
- Water system maintenance requires routine maintenance of potable water due to flushing of lines/hydrants. Also unplanned discharges like line breaks.
- Chlorine in potable water is toxic to aquatic wildlife if levels high enough, though little or no evidence that planned discharges cause any problems with current level of BMPs, monitoring and reporting required by MRP.

Staff will continue to work with BASMAA and appropriate municipal staffs to track and communicate a municipal water purveyor position on this draft permit, and recommends this position include: 1) municipal purveyors should retain coverage under a municipal stormwater permit, rather than needing to get coverage under yet another discharge permit (municipalities are already typically subject to the MRP, sanitary sewer collection system permitting, and/or wastewater treatment plant discharge permits), 2) the current potable water discharge BMP and monitoring requirements in MRP Provision C.15 are adequate to protect water quality and do not need to be modified, and 3) a numeric effluent limit for chlorine is not justified.

**E. INFORMATION – MRP COMPLIANCE OVERVIEW/QUARTERLY CHECK-IN** – No discussion for lack of time.

**F. INFORMATION – OTHER ISSUES, SUBCOMMITTEE UPDATES** – No discussion for lack of time.

**5. NEXT MEETING** – No discussion for lack of time but the next meeting is scheduled for July 15, 2014 at the usual location: the Oak Room in the City of San Mateo Main Library.

**MEETING ADJOURNED**

DRAFT

## **NPDES Technical Advisory Committee AGENDA REPORT**

**Date:** July 15, 2014  
**Item:** 4A  
**From:** Matthew Fabry, Program Coordinator  
**Subject:** Annual Reporting Process/Schedule

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### **SUMMARY**

Key dates are as follows:

**July 16** – Annual report package emailed out to each municipality

**August 7** – Countywide Program annual report emailed for municipal review/comment

**August 20** – Permittee reports due to EOA if municipalities want review/comment

**Sept 10** – Final permittee reports due to EOA for bundling and submittal to Water Board

### **San Mateo Permittee Annual Reports:**

- July 16 – Annual Report preparation guidance package emailed to municipalities Permittees and posted on SMCWPPP website ([www.flowstobay.org](http://www.flowstobay.org)), including:
  - Guidance memo regarding process and schedule
  - SMCWPPP annotated/customized forms
  - Model cover letter
  - Model certification statement
- August 20 – San Mateo Permittees provide draft Annual Reports to EOA for review
- September 3 – EOA provides comments on draft Annual Reports
- September 10 – Final Annual Reports due via email to EOA
- September 12 – Final Annual Reports uploaded as a group by EOA to Water Board's ftp site

### **Countywide Program's Annual Report:**

- August 7 – Draft Countywide Program Annual Report sent to TAC and Stormwater Committee for review
- August 21 – Comments due to EOA on draft Countywide Program Annual Report
- September 12 – Countywide Program Annual Report uploaded to Water Board ftp site

# NPDES Technical Advisory Committee AGENDA REPORT

**Date:** July 15, 2014  
**Item:** 4B  
**From:** Matthew Fabry, Program Coordinator  
**Subject:** Update on Potential Countywide Funding Initiative

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## **SUMMARY**

The following agenda report was provided to the C/CAG Board at its June meeting and gives an update on the potential countywide stormwater funding initiative.

## **BACKGROUND/DISCUSSION**

Since January of 2013, C/CAG has been working with a consultant team led by SCI Consulting Group to evaluate the feasibility of a countywide funding initiative to generate new, ongoing revenue for C/CAG and its member agencies to implement water pollution prevention programs consistent with the requirements of the Municipal Regional Stormwater Permit (MRP) issued by the San Francisco Bay Regional Water Quality Control Board. To date, the consultant team has prepared draft funding needs and funding options reports and performed public opinion research to gauge support for a potential initiative.

Although staff and the consultant team were working to complete various tasks to allow the C/CAG Board to consider authorizing a fall balloting effort, they have now slowed the pace of the various efforts to focus on a potential initiative in 2015 or thereafter. The primary reasons for this are:

- C/CAG's enabling legislation (AB 418) is on hold pending sufficient Assembly support
- Reissuance of the MRP for its second five-year term is delayed from this fall until June 2015
- Member agencies have competing community priorities requiring public support for additional funding
- The funding needs analysis indicates a countywide shortfall significantly exceeding what the public would likely support via an initiative

Based on the first two items, staff recommends postponing any significant additional consultant-led efforts until 2015, likely after a draft MRP is out for public comment. In the interim, staff intends to continue community outreach and engagement efforts, work with the Stormwater Committee, C/CAG Board, and City Managers Association to refine and re-evaluate the best approach and timing for an initiative, and seek opportunities to integrate water quality solutions with other community priorities to achieve more cost-effective and multi-benefit approaches that may have greater public support. Additional details on the above bullets are provided below:

**Enabling Legislation:** AB 418 (Mullin) would affirm C/CAG's specific authority as a joint powers agency to propose for voter or property owner approval a countywide special tax or property-related fee for stormwater pollution prevention programs. Unfortunately, AB 418 has been placed in the "inactive file" at the request of the author due to difficulty in garnering 2/3 support in the Assembly, as required for bills designated as "urgent." A separate bill, AB 2170, also authored by Assemblymember Mullin, would also address C/CAG's needs by amending the joint powers code to



affirm that any joint powers agency has taxation and fee authority as long as all of its member agencies jointly hold that authority. AB 2170 has passed out of the Assembly and moves next to the Senate Governance and Finance Committee. If the bill gets signed by the governor, it will go into effect on January 1, 2015. Assemblymember Mullin prefers a statewide solution to this issue, but if AB 2170 encounters significant opposition, AB 418 could be amended to remove the urgency clause and go back for approval by both the Senate and then the Assembly.

Municipal Regional Permit Reissuance: The MRP expires at the end of November 2014. Regional Water Board staff has indicated their intent to have a draft permit out for public review in February 2015 and a new permit adopted to go into effect by July 1, 2015. Staff expects member agencies will be better situated to evaluate their need for a funding initiative after seeing compliance requirements for the next five-year permit term. A significant issue will be the mercury and PCB reduction requirements, as the second five-year term of the MRP transitions from the current pilot-scale efforts to focused implementation of measures intended to achieve specific reductions on a countywide basis, which are expected to result in a significant increase in compliance costs.

Municipal Priorities: Member agencies have indicated that while protection of water quality is important, it is competing with many other community priorities, including aging sewer and water infrastructure and the need for wastewater treatment plant upgrades, deteriorating roadways, and education, many of which also require public support for increased funding.

Funding Needs Analysis: The final draft needs analysis estimates annual countywide costs to implement existing MRP requirements at approximately \$16 million and future trash load and mercury/PCBs reduction requirements at \$7 million and \$23 million, respectively, while existing dedicated annual revenue is only \$9 million, resulting in an annual countywide shortfall of \$37 million. The significant costs associated with meeting the mercury/PCBs requirements are due to need to reduce very low pollutant concentrations spread throughout very large geographic areas in order to meet overall load reduction requirements.

# **NPDES Technical Advisory Committee AGENDA REPORT**

**Date:** July 15, 2014  
**Item:** 4C  
**From:** Matthew Fabry, Program Coordinator  
**Subject:** Update on PCBs/Mercury Planning and Data Collection

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## **SUMMARY**

Receive an update on SMCWPPP and regional efforts to address PCBs and mercury discharges in urban runoff and develop associated requirements for the reissuance of the Municipal Regional Permit (MRP), including:

- pilot studies conducted under the current permit (MRP 1.0);
- Integrated Monitoring Report results and integration with Green Infrastructure planning (e.g., Green Street retrofit projects provide the opportunity for integration of pollutant load reductions with other drivers and funding sources such as transportation projects);
- the framework and schedule for gathering information (i.e., opportunity area analysis and implementation planning) over the next few months to inform PCB and mercury requirements in the upcoming reissued permit (MRP 2.0); and
- MRP 2.0 negotiation status and current permit language frameworks.

## **BACKGROUND**

Total Maximum Daily Load (TMDL) water quality restoration plans for polychlorinated biphenyls (PCBs) and mercury in the San Francisco Bay indicate that a roughly 90% reduction in PCBs and 50% reduction in mercury in discharges from urban stormwater runoff to the Bay are needed to achieve water quality standards. Provisions C.11 and C.12 of MRP 1.0 require Permittees to implement pilot-scale control measures. Regional Water Board (RWB) staff expects municipal agencies to move from this pilot-scale work to “focused implementation” in the next permit (i.e., MRP 2.0). Program staff and representatives from the nine San Mateo County municipalities with relatively large amounts of old industrial land use have convened a new PCBs and Mercury Workgroup. The Workgroup will assist in efforts to identify high opportunity areas with PCB and/or mercury sources where focused control measure implementation could occur during MRP 2.0. Program staff is also working with RWB staff to develop reissued permit requirements for the upcoming MRP 2.0, with emphasis on planning future Green Infrastructure integration across the urban landscape.

## **NPDES Technical Advisory Committee AGENDA REPORT**

**Date:** July 15, 2014  
**Item:** 4D  
**From:** Matthew Fabry, Program Coordinator  
**Subject:** Update on Potential Changes to MRP Potable Water Discharge Permitting

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### **SUMMARY**

The State Water Resources Control Board (State Board) and the San Francisco Bay Regional Water Quality Control Board (Regional Board) have released draft statewide and regional general permits, respectively, for discharges of potable water to receiving water bodies. Recently, the Regional Board put its effort on hold to allow the State Board's process to proceed. Both proposed permits may impact municipalities that are already regulated for potable water discharges under the Municipal Regional Permit. Attached is a summary of these permitting efforts, the timeline for providing public comment, and recommended comment topics.

### **ATTACHMENTS**

Summary of draft potable water discharge permit issues, timeline, and issues for public comment.

# **Regional and State Water Board Potable Water Discharge General Permits Status Report for Municipal Water Purveyors**

## **INTRODUCTION**

Water districts or public/private water purveyors are responsible for developing water supplies and providing drinking water to their communities and customers in accordance with statutory requirements of the federal Safe Drinking Water Act and the California Health and Safety Code. Mandatory system-development and system maintenance activities (such as hydrant flushing or storage tank draining) to comply with these requirements often result in surface water discharges, either via storm drain systems or directly to receiving waters such as creeks or San Francisco Bay.

Discharges of potable water and treated drinking water can have constituents of concern for surface water quality. Most notably, the California Department of Public Health requires surface water that is treated for public distribution to have a chlorine residual, for prevention of re-growth of bacteria while in the distribution system. Although chlorine at these levels is safe for humans to consume, it is potentially toxic to aquatic life if not managed correctly via Best Management Practices (BMPs).

## **NPDES PERMITTING AND IMPLICATIONS**

Clean Water Act section 402 requires that most discharges of pollutants to surface waters be regulated by a National Pollutant Discharge Elimination System (NPDES) permit. Large and small municipalities have Municipal Separate Storm Sewer System (MS4) NPDES permits for discharge of stormwater runoff to surface waters.

Potable water discharges have been effectively managed under MS4 permits since the late 1990s using industry standard BMPs. The San Francisco Bay Municipal Regional Permit (MRP) Provision C.15.b.iii establishes as Conditionally Exempted Non-Stormwater Discharges planned, unplanned and emergency discharges from potable water systems. This provision was carefully crafted as part of the development of the MRP and represented a substantial ramp-up in level of effort compared to previous Bay Area MS4 permits. All Bay Area Phase I MS4s that are also water utilities began implementation of the MRP monitoring, data collection, notification, and reporting program requirements in October 2009.

Currently, discharges from several Bay Area water purveyors not owning or operating MS4 systems (such as EBMUD) are not covered by the MRP or another NPDES permit. These water purveyors have been working with San Francisco Bay Regional Water Quality Control Board (SF-RWB) staff for the last two years to develop a new NPDES General Permit to provide them with Clean Water Act coverage. The Region 5 RWB also began development a regional community water system potable water discharge NPDES general permit. In parallel over approximately the past year, the State Water Resources Control Board (SWB) has been working to develop a multi-regional and most recently a statewide general NPDES permit for potable water discharges. The SWB permit requirements appear significantly less complex and onerous than those in the SF-RWB permit. However, similar to the SF-RWB permit, a major concern is that the SWB permit includes a proposed chlorine effluent limit associated with Minimum Mandatory Penalties of \$3,000 per exceedance.

## **RWB VERSUS SWB PERMITTING SCHEDULES**

The SF-RWB staff released their Tentative Order (TO) for their Drinking Water Systems General Permit for public comment on May 8, 2014. SMCWPPP submitted a comment letter by the June 23, 2014 deadline. The City of San Carlos and San Mateo County also submitted comment letters.

The SWB staff released their version of a draft Drinking Water Systems General Permit for public comment on June 6, 2014. As currently written, the SWB permit if adopted would supersede (terminate) coverage under similar RWB Orders. The SWB's stated intent in the issuance of the statewide NPDES permit is to provide consistent and efficient regulation of discharges from existing drinking water systems statewide. On July 1, 2014 the SF-RWB issued a notice of postponement for the SF-RWB TO process.

Key dates as they stand now are shown below. The SWB has extended their comment period based on the request of various agencies and have scheduled several stakeholder workshops. The SWB issued a Revised TO on July 3, 2014 and held a Stakeholder Meeting in Oakland on July 9<sup>th</sup>. In a parallel effort the SWB staff are developing a new tiered fee structure for drinking water agencies seeking coverage under this General Permit. There may be a draft of the fee structure by August.

### **SWB Statewide Permit**

1. Comments due noon August 19
2. Stakeholder Meeting in Sacramento July 21
3. Stakeholder Meeting in Southern California July 23
4. Public Hearing August 5
5. SWB Permit Adoption Hearing September 23

### **MRP IMPACTS**

The SWB permit will allow municipal stormwater permittees to simply file a notice of non-applicability if their potable water discharges are already being effectively regulated by RWBs under their existing stormwater permits, such as is the case under the MRP. There is uncertainty if the SF-RWB permit indicates the potential impacts on the upcoming reissuance of the MRP.

### **COMMENTING ON THE PERMIT DURING THE PUBLIC COMMENT PERIOD**

SMCWPPP will be preparing a draft comment letter on the SWB TO on behalf of their MRP Permittees that are water purveyors. Highlights from the letters include:

- The Permittees appreciate the SWB draft permit excluding them from the proposed Statewide Potable Discharge General Permit, as there is no desire or need for a second NPDES permit and the associated additional annual permit fees, administrative costs and potential exposure to Mandatory Minimum Penalties.
- The Permittees request that the proposed chlorine and turbidity WQBELs be replaced with benchmarks.

Municipal water purveyors may also wish to individually submit comments to the SWB by the August 19 deadline.

## **NPDES Technical Advisory Committee AGENDA REPORT**

**Date:** July 15, 2014  
**Item:** 4E  
**From:** Matthew Fabry, Program Coordinator  
**Subject:** MRP Compliance Overview/Quarterly Check-In

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### **SUMMARY**

Staff will provide an update on compliance activities that should have been completed in the previous quarter and those that will need to be completed in the upcoming quarter.

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Subcommittee	Quarterly Check-ins for Permit Compliance and Related Items			
					2014			
					Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
<b>C.2.a. Road Repair</b>	Permittees shall develop and implement appropriate BMPs at street and road repair and/or maintenance sites to control debris and waste materials during road and parking lot installation, and repaving or repair maintenance activities such as those describe in the CASQA Handbook for Municipal Operations.	Provide training.	Continue to implement appropriate BMPs developed for street and road maintenance.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.2.b. Pavement Washing</b>	Permittees shall coordinate with sanitary sewer agencies to determine if disposal to the sanitary sewer is available for wastewater generated from these activities provided that appropriate approvals and pretreatment standards are met.	N/A	Coordinate with sanitary sewer agency located where surface cleaning will occur to determine if disposal to the samitary sewer is available provided pretreatment requirements are met.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.2.b. Pavement Washing</b>	Permittees shall implement, and required to be implemented, BMPs for pavement washing, mobile cleaning, pressure wash operations in such locations as parking lots and garages, trash areas, gas station fueling areas, and sidewalks and plaza cleaning, which prohibit the discharge of polluted wash water and non-stormwater to the storm drain.	N/A	Following your review of BASMAA's "Pollution from Surface Cleaning" BMPs <a href="http://www.basmaa.org/Portals/0/documents/pdf/Pollution%20Surface%20Cleaning.pdf">http://www.basmaa.org/Portals/0/documents/pdf/Pollution%20Surface%20Cleaning.pdf</a> implement these BMPs or more stringent BMPs for agency surface cleaning and require others to implement for their surface cleaning.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.2.c.i (2) Bridge &amp; Structural Maintenance &amp; Graffiti Removal</b>	Permittees shall implement BMPs for graffiti removal that prevent non-stormwater and wash water discharges into storm drains.	N/A	Continue to protect nearby storm drain inlets before removing graffiti from walls, signs, sidewalks and prevent any discharge of debris, cleaning compound waste, paint waste, or washwater to storm drains or watercourses.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.2.c.i(1) Bridge &amp; Structural Maintenance &amp; Graffiti Removal</b>	Permittees shall implement appropriate BMPs to prevent polluted stormwater and non-stormwater discharges from bridges and structural maintenance activities directly over water or into storm drains.	N/A	Determine the proper disposal method for particular wastes generated from these activities. Continue to train agency employees and/or specify in contracts the proper capture and disposal methods for waste captures. Consider using appropriate BMPs from "Caltrans Storm Water Quality Handbook Maintenance Staff Guide:" <a href="http://www.dot.ca.gov/hq/env/stormwater/special/newsetup/pdfs/management_ar_rwp/CTSW-RT-02-057.pdf">http://www.dot.ca.gov/hq/env/stormwater/special/newsetup/pdfs/management_ar_rwp/CTSW-RT-02-057.pdf</a>	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.2.d.i Pump Stations</b>	Permittees shall develop and implement measures to operate, inspect and maintain stormwater pumps stations to eliminate non-stormwater discharges containing pollutants, and to reduce pollutant loads in the stormwater discharges to comply with WQS.	N/A	Continue to implement Inspection and Sampling Plan	Muni. Maint.	--	--	--	--
<b>C.2.d.ii.(1) Pump Stations</b>	Complete an inventory of pump stations within each Permittees' jurisdiction, including locations and key characteristics.	N/A	Update, if needed, pump station inventory	Muni. Maint.	--	--	--	--
<b>C.2.d.ii.(2) Pump Stations</b>	Inspect and collect DO data from all pump stations twice a year during the dry season.	N/A	Continue to mplement Inspection and Sampling Plan	Muni. Maint.	--	--	Program: Send reminder email by August 15th to agencies of requirement for 2 samples during dry season. Agencies: collect two DO samples from pump stations during dry weather for FY 14-15 (during July - September).	--
<b>C.2.d.ii.(3) Pump Stations</b>	If DO levels are at or below 3 mg/L, apply corrective actions to maintain DO concentrations of the discharge above 3 mg/L. Verify corrective actions are effective by increasing DO monitoring interval to weekly until two weekly samples are above 3 mg/L.	N/A	Continue to mplement Inspection and Sampling Plan	Muni. Maint.	--	--	Follow up corrective actions and sampling as needed.	Follow up corrective actions and samples as needed.
<b>C.2.d.ii.(4) Pump Stations</b>	Inspect pump stations twice a year during the wet season in the first business day after one-quarter inch and larger storm events after a minimum of two week antecedent period. Post storm inspections shall include collecting and reporting presence and quantity estimate of trash, including the presence of odor, color, turbidity and floating hydrocarbons.	N/A	Continue to mplement Inspection and Sampling Plan	Muni. Maint.	Program: Send reminder email by January 15th to agencies of requirement for 2 inspections during wet season. Agencies: conduct 2 inspections after appropriate rain events.	--	--	Program: Send reminder email to inspect 2x after appropriate rain events. Agency: conduct 2 inspections after appropriate rain events.
<b>C.2.d.iii. Pump Stations</b>	Annually report monitoring data, inspection and maintenance records, volume or mass of waste materials removed from pump stations, and any corrective actions.	N/A	Continue to complete reporting form	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Subcommittee	Quarterly Check-ins for Permit Compliance and Related Items			
					2014			
					Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
<b>C.2.e. Rural Public Works Construction and Maintenance</b>	Permittees shall implement and require contractors to implement BMPs for erosion and sediment control during and after construction for maintenance activities on rural roads. Develop and implement appropriate training and technical assistance resources for rural public works activities.	N/A	If your agency has determined that it is subject to these requirements, continue to implement appropriate BMPs, such as those contained in the FishNet 4C Roads Manual: <a href="http://www.fishnet4c.org/projects_roads_manual.html">http://www.fishnet4c.org/projects_roads_manual.html</a>	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.2.e. Rural Public Works Construction and Maintenance</b>	Permittees shall notify the Water Board, Fish and Game, and U.S. Army Corps of Engineers, where applicable, and obtain appropriate permits for rural public works activities before work in or near creeks and wetlands.	N/A	This requirement exists regardless of whether it was included in the MRP. Continue to implement the required notification and permit acquisition processes for rural public works activities.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.2.e. Rural Public Works Construction and Maintenance</b>	Permittee shall identify and prioritize rural road maintenance on the basis of soil erosion potential, slope steepness, and stream habitat resources.		If your agency has determined that it is subject to these requirements, identify and prioritize rural road maintenance.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.2.e. Rural Public Works Construction and Maintenance</b>	Permittee shall develop and implement an inspection program to maintain rural roads' structural integrity and prevent impacts on water quality.		If your agency has determined that it is subject to these requirements, develop and implement an inspection program.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.2.e. Rural Public Works Construction and Maintenance</b>	Permittees shall provide training on BMPs to rural public works maintenance staff at least twice during permit term.		If your agency has determined that it is subject to these requirements, provide 2 trainings.	Muni. Maint.	Ongoing. Note: SMCWPPP provided training in November 2013. Applicable agencies should have provided at least one other training by end of permit term.	Ongoing. Note: SMCWPPP provided training in November 2013. Applicable agencies should have provided at least one other training by end of permit term.	Ongoing. Note: SMCWPPP provided training in November 2013. Applicable agencies should have provided at least one other training by end of permit term.	Ongoing. Note: SMCWPPP provided training in November 2013. Applicable agencies should have provided at least one other training by end of permit term.
<b>C.2.f. Corp Yards</b>	Permittees shall prepare, implement, and maintain a site specific SWPPP for corporation yards, including municipal vehicle maintenance, heavy equipment and maintenance vehicle parking areas, and material storage facilities.	N/A	Implement SWPPP and update as needed	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.2.f. Corp Yards</b>	Permittees shall inspect corporation yards at least annually before the start of the rainy season.		Conduct inspections	Muni. Maint.	--	--	Program: In August send reminder email to conduct corp yard inspections. Agencies: conduct annual corporation yard inspection for FY 14-15 reporting period before rainy season, i.e., before the end of Sept.	--
<b>C.3.a Performance Standards</b>	(2) Have adequate development review and permitting procedures to impose conditions of approval or other enforceable mechanisms to implement the requirements of Provision C.3.	Update C.3 Checklist	Use the Countywide Program's updated C.3 checklist to apply the C.3 requirements to development projects.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.a Performance Standards</b>	(3) Evaluate potential water quality effects and identify appropriate mitigation measures when conducting environmental reviews, such as CEQA.	Not Applicable	Evaluate/mitigate water quality impacts in CEQA documents.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.a Performance Standards</b>	(4) Provide training adequate to implement the requirements of Provision C.3 for staff including interdepartmental training.	Hold countywide training workshop on requirements of Provision C.3	Provide training adequate to implement Provision C.3 requirements	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.a Performance Standards</b>	(5) Provide outreach adequate to implement the requirements of Provision C.3., including providing education materials to municipal staff, developers, contractors, construction site operators, and owner/builders, early in the planning process and as appropriate.	Keep flyers current, as needed	Provide C.3 flyer and (as appropriate) the hydromodification management flyer to applicants.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing



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<b>C.3.a Performance Standards</b>	(6) For all new development and redevelopment projects not regulated by Provision C.3., encourage the inclusion of adequate site design measures that include minimizing land disturbance and impervious surfaces (especially parking lots); clustering of structures and pavement; disconnecting roof downspouts; use of micro-detention, including distributed landscape detention; preservation of open space; protection and/or restoration of riparian areas and wetlands as project amenities.	Continue to provide guidance on site design measures.	Encourage the use of site design measures in projects that are not C.3 Regulated Projects.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.a Performance Standards</b>	7) For all new development and redevelopment projects not regulated by Provision C.3., encourage the inclusion of adequate source control measures to limit pollutant generation, discharge, and runoff, to the maximum extent practicable.	Update source control model list as needed.	Encourage the use of source control measures in projects that are not C.3 Regulated Projects.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.a Performance Standards</b>	(8) Revise, as necessary, General Plans to integrate water quality and watershed protection with water supply, flood control, habitat protection, groundwater recharge, and other sustainable development principles and policies and to require implementation of the measures required by Provision C.3 for all Regulated Projects defined in Provision C.3.b.	Not Applicable	Review General Plans to identify any need for updates based on new requirements included in Provision C.3.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.b Regulated Projects</b>	ii. (1) Special Land Use Categories: Beginning December 1, 2011, all references to 10,000 square feet for (a) New Development or redevelopment projects changes to 5,000 square feet.	Update C.3 Checklist	Use updated C.3 checklist to apply C.3 requirements to projects that meet Special Land Use Category criteria.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.b Regulated Projects</b>	(4)(a) Road Projects: Construction of new streets or roads, including sidewalks and bicycle lanes built as part of the new streets or roads. (4)(d) Exclusions to road project requirements. (4)(e) If application is deemed complete on/before 12/1/09, new road/trail requirements do not apply so long as project applicant is diligently pursuing the project. If, from 12/1/09 to 12/1/11, project applicant has not acted to obtain approvals, requirements apply. (4)(f) If application is deemed complete after 12/1/09, new road/trail requirements do not apply if the project receives final discretionary approval by 12/1/11.(4)(g) If funding has been committed and public road/trail construction is scheduled to begin by 12/1/12, the new requirements shall not apply.	Hold discussions of road project requirements in Subcommittee meetings as needed.	Apply C.3 requirements to road projects.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.b Regulated Projects</b>	(4)(b) Widening of existing streets or roads with additional lanes of traffic. (4)(c) Construction of impervious trails greater than 10 ft wide or creekside (within 50 ft of top of bank). (Effective 12/1/11)	Hold discussions of road widening project requirements in Subcommittee meetings as needed.	Apply C.3 requirements to road widening projects.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.b Regulated Projects</b>	iii. Green Streets Pilot Projects: The Permittees shall cumulatively complete ten pilot green street projects that incorporate LID techniques for site design and treatment in accordance with Provision C.3.c and that provide stormwater treatment sized in accordance with Provision C.3.d. (A Regulated Project may not be counted as one of the 10 pilot green street projects. (Complete construction by 12/1/14)	Coordinate with BASMAA and applicable cities as needed.	Cities with pilot green street projects (or potential pilot green street projects) will need to complete a reporting form for the project.	New Dev	--	--	Complete relevant portion of Annual Report Form (if applicable)	--
<b>C.3.b Regulated Projects</b>	iii. (5) Green Streets Pilot Projects: The Permittees shall conduct appropriate monitoring of these projects to document the water quality benefits achieved.	Coordinate with BASMAA and applicable cities as needed.	Municipalities with green street projects will need to coordinate with BASMAA, as BASMAA prepares report to meet this requirement. (Final report submitted Sept. 15, 2013.)	New Dev	--	--	--	--
<b>C.3.c Low Impact Development (LID)</b>	i.(1) Source Control Requirements [minor differences between requirements in this provision and Countywide Program's Model Source Control List]. (Implementation Date: December 1, 2011)	Update source control model list as needed	Continue implementing source control measures on the Source Control Model List.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.c Low Impact Development (LID)</b>	i.(2) Site Design and Stormwater Treatment Requirements (a) Require each Regulated Project to implement at least one of the following [site design] strategies onsite.... i.(2) Site Design and Stormwater Treatment Requirements (b) Require each Regulated Project to treat 100% of the amount of runoff identified in Provision C.3.d for the Regulated Project's drainage area with LID treatment measures onsite or with LID treatment measures at a joint stormwater treatment facility.	Hold discussion of worksheets at subcommittee meetings or training sessions as needed.	Use feasibility worksheets to require applicants to evaluate feasibility of infiltration and rainwater harvesting/use before allowing the use of biotreatment.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing

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<b>C.3.c Low Impact Development (LID)</b>	i.(2) (b)(v) Permittees, collaboratively or individually, shall submit a report on their experience with determining infeasibility of harvesting and reuse, infiltration, or evapotranspiration at Regulated Project sites.	Coordinate with BASMAA and member agencies as needed.	Collect and track information on the results of feasibility analyses, which will be the basis of the regional report.	New Dev	Final report submitted December 1, 2013.	--	--	--
<b>C.3.c Low Impact Development (LID)</b>	i.(2) (b)(vi) Permittees, working collaboratively or individually, shall submit for Water Board approval, a proposed set of model biotreatment soil media specifications and soil infiltration testing methods to verify a long-term infiltration rate of 5 to 10 inches/hour.	Provide information on soil specifications to soil providers.	Require projects with biotreatment measures to use the biotreatment soil specifications included in the November 28 amendment of the MRP.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.c Low Impact Development (LID)</b>	i.(2) (b)(vii) Permittees shall submit for Water Board approval, proposed minimum specifications for green roofs.	Not applicable	Require projects with green roofs to use the green roof specifications included in the November 28 amendment of the MRP (included in Section 6.9 of the C.3 Technical Guidance).	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.d Numeric Sizing Criteria for Storm-water Treatment Systems</b>	i. Require that stormwater treatment systems constructed for Regulated Projects meet at least one of the following hydraulic sizing design criteria: (1) Volume Hydraulic Design Basis; (2) Flow Hydraulic Design Basis; and (3) Combination Flow and Volume Design Basis. iv. Limitations on Use of Infiltration Devices in Stormwater Treatment Systems [minor changes since previous permit]. Implement 12/1/09.	Update hydraulic sizing criteria section in C.3 Technical Guidance	Confirm that the design of treatment measures in project submittals meet the C.3.d criteria.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.e Alternative Compliance with Provisions C.3.c</b>	i.The Permittees may allow a Regulated Project to provide alternative compliance with Provision C.3.c in accordance with one of the two options listed below: Option 1: LID Treatment at an Offsite Location; and 2: Payment In-Lieu Fees	Seek grant funding to develop green street plan and GIS planning tool	Support the Countywide Program in its efforts to develop a green street plan for retrofit projects that can be used for alternative compliance.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.e Alternative Compliance with Provisions C.3.c</b>	iv. (1) Beginning December 1, 2011, Permittees shall track any identified potential Special Projects that have submitted planning applications but that have not received final discretionary approval. (2) By March 15 and September 15 of each year, Permittees shall report to the Water Board on these tracked potential Special Projects ... Any Permittee with no potential Special Projects shall so state.	Remind Subcommittee of required March report on Special Projects.	Submit required information on Special Projects every March and September. If your agency has no Special Projects, you must inform the Water Board that you have no applicable projects.	New Dev	Special Projects Reports Submitted on behalf of permittees on March 17, 2014.	--	Submit required information on Special Projects by September 15, 2014 (with the Annual Report). If your agency has no Special Projects, you must inform the Water Board that you have no applicable projects.	--
<b>C.3.e Alternative Compliance with Provisions C.3.c</b>	iv.(2) For each Special Project [reported], Permittees shall include a narrative discussion of the feasibility or infeasibility of 100% LID treatment, onsite and offsite.	Coordinate with BASMAA and Subcommittee to provide guidance on infeasibility reporting	Require applicants with Special Projects that will use LID treatment reduction credits to report a narrative discussion on why 100% LID treatment was infeasible for the project.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.f Alternative Certification of Stormwater Treatment Systems</b>	In lieu of reviewing a Regulated Project's adherence to Provision C.3.d., a Permittee may elect to have a third party conduct detailed review and certify the Regulated Project's adherence to Provision C.3.d. [Minor change to requirements in previous permit.] No implementation date in permit. Assume 12/1/09 effective date.	Not applicable	Agencies that use Alternative Certification (3rd party review of stormwater treatment measure design) may continue to use these programs.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.g Hydromodification Management</b>	All HM Projects shall meet the Hydromodification Management Standard of Provision C.3.g.ii. [HM exemptions from previous permit have been eliminated.]	Coordinate with Alameda and Santa Clara programs regarding training for municipal staff on how to review Bay Area Hydrology Model submittals.	Continue applying the HM requirements to project that meet the criteria for HM projects.	New Dev	Ongoing. Bay Area Hydrology Model (BAHM) training workshops set for April 8, 9 and 10.	Bay Area Hydrology Model (BAHM) training workshops completed on April 8, 9 and 10.	Ongoing	Ongoing
<b>C.3.h Operation and Maintenance of Storm-water Treatment Systems</b>	ii. (4) O&M Program shall include a written plan and implementation of the plan that describes O&M (including inspection) of all Regional Projects and regional HM controls that are Permittee owned and/or operated.	Not applicable	Currently there are no regional projects to which this would apply.	New Dev	--	--	--	--

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<b>C.3.h Operation and Maintenance of Storm-water Treatment Systems</b>	ii. (5) O&M Program shall include database or equivalent tabular format of all regulated projects (public and private) that have installed ... stormwater treatment and HM controls.	Not applicable	Track O&M inspection data as required, either in an Excel spreadsheet or relational database.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.h Operation and Maintenance of Storm-water Treatment Systems</b>	ii.(6) O&M Program shall include a prioritized plan for inspecting all installed stormwater treatment systems and HM controls. [New requirements added since pervious permit.]	Not applicable	Keep your agency's O&M verification inspection plan up to date, as needed, and continue implementing the plan.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.3.i Detached Single-Family Home Projects</b>	i. Require all detached single-family home projects that create and/or replace 2,500 square feet or more of impervious surface to implement one or more stormwater lot-scale BMPs. (Implement 12/1/12)	Coordinate with BASMAA to develop standard specifications. Provide training on C.3.i requirements	Implement the new requirements on December 1, 2012, using standard specifications that BASMAA is scheduled to complete in September 2012.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.4.a. Legal Authority</b>	Permittees shall have sufficient legal enforcement authority to inspect, require effective stormwater pollutant control, and escalate enforcement to achieve expedient compliance at commercial and industrial sites within their jurisdiction.	NA	Update legal authority, as needed.	CII	--	--	--	--
<b>C.4.b. Inspection Plan</b>	Permittees shall develop and implement an inspection plan that will serve as a prioritized inspection work plan.	N/A	Each year submit required Business Inspection Plan (BIP) information with annual report.	CII	Recommend reviewing your agency's Business Inspection Plan (BIP) and Enforcement Response Plan (ERP) if you have not done this recently.	Ongoing	Ongoing	Ongoing
<b>C.4.c. Enforcement Response Plan (ERP)</b>	Permittees shall develop and implement an ERP that will serve as a reference document for inspection staff to take consistent actions to achieve timely and effective compliance from all commercial and industrial site operators.	N/A	Continue to implement the ERP.	CII	Recommend reviewing your agency's Business Inspection Plan (BIP) and Enforcement Response Plan (ERP) if you have not done this recently.	Ongoing	Ongoing	Ongoing
<b>C.4.c.ii(4) Record-keeping and C.4.c.iii Reporting</b>	Permittees shall maintain adequate records to demonstrate compliance including maintenance of an electronic database or equivalent tabular system that contains information listed in MRP. In addition, MRP lists specific inspection information for inclusion in the Annual Report.	N/A	Continue to implement the MRP-required recordkeeping.	CII	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.
<b>C.4.d Staff Training</b>	Permittees shall provide annually inspectors with focused training. Training may be Program-wide, Region-wide, or Permittee-specific.	Implement agreed upon training using one of the options allowed by the MRP.	Continue to conduct annual inspector training.	CII	Train staff using Program materials.	Program: Provided training on April 17. Agency: Have staff attend training.	Train staff using Program materials.	Train staff using Program materials.
<b>C.5.a. Legal Authority</b>	Permittees shall have the legal authority to prohibit and control illicit discharges and escalate stricter enforcement to achieve expedient compliance.	N/A	Update legal authority, as needed	CII	--	--	--	--
<b>C.5.b. Enforcement Response Plan (ERP)</b>	Permittees shall develop and implement an ERP that will serve as guidance for inspection staff to take consistent actions to achieve timely and effective abatement of illicit discharges.	N/A	Continue to implement the ERP.	CII	Recommend reviewing your agency's Enforcement Response Plan (ERP) if you have not done this recently.	Ongoing	Ongoing	Ongoing
<b>C.5.c. Spill &amp; Dumping Response, Complaint Response, &amp; Inspection Frequency</b>	Permittees shall have a central contact point including a phone number for complaints and spill reporting, and publicize this number to both internal Permittee staff and the public.	N/A	Continue to maintain a central contact point including phone number for complaints and spill reporting. Continue to publicize this number to Permittee staff and the public.	CII	Ongoing	Ongoing	Ongoing	Ongoing

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<b>C.5.c. Spill &amp; Dumping Response, Complaint Response, &amp; Inspection Frequency</b>	Develop a spill/dumping response flow chart and phone tree or contact list for internal use that shows the various responsible agencies and their contacts, including who would be involved in illicit discharge incident response that goes beyond the Permittees immediate capabilities.	N/A	Municipalities that have not already done so, will adapt the template or example for their use.	CII	--	--	--	--
<b>C.5.d.ii(1)(a) Control of Mobile Sources</b>	Develop and implement minimum standards and BMPs to be required for each of the various types of mobile businesses.	N/A	Continue to implement the minimum agreed to standards and BMPs.	CII	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.5.d.ii(1)(b) Control of Mobile Sources</b>	Develop and implement an enforcement strategy that specifically addresses the unique characteristics of mobile businesses.	N/A	Continue to implement enforcement strategy.	CII	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.5.e. Collection System Screening - MS4 Map Availability</b>	Permittees shall develop and implement a screening program using guidance referenced in the MRP. Permittees shall implement screening program by conducting a survey of strategic collection system check points.	N/A	Continue to implement a screening program by surveying strategic collection system check points.	CII	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.5.f. Tracking and Case Follow-up</b>	Create and maintain a water quality spill and discharge complaint tracking and follow-up in an electronic database or equivalent tabular system.	N/A	Continue to implement the agreed upon tracking spreadsheet.	CII	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.6.b. Enforcement Response Plan (ERP)</b>	Develop and implement an Enforcement Response Plan (ERP) that ensures effective site management by operators.	N/A	Continue to use your agency's ERP.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.6.c. Best Management Practice Categories</b>	Require all construction sites to have seasonally appropriate effective BMPs in 6 categories: erosion control, run-on and runoff control, sediment control, active treatment systems (as necessary), good site management, and non-stormwater management.	Update the checklist as needed.	Continue to use the construction site inspection checklist to conduct the required inspections.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.6.c. Best Management Practice Categories</b>	Require all construction sites to have seasonally appropriate effective BMPs in 6 categories: erosion control, run-on and runoff control, sediment control, active treatment systems (as necessary), good site management, and non-stormwater management.	N/A	Distribute the BMP plan sheet to project applicants.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.6.d. Plan Approval Process</b>	Review erosion control plans for consistency with local minimum required management practices. [No implementation date in permit. Assume 12/1/09 effective date.]	N/A	Continue to review erosion control plans for consistency with local requirements.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.6.e. Inspections</b>	ii. (1) By September 1 of each year, each permittee shall remind all sites disturbing 1 acre or more of soil to prepare for wet season.	Provide model letter/email to agencies.	Adapt model letter for local use and send to developers/owners of sites disturbing 1 acre or more of land.	New Dev	--	--	Municipalities should send pre-wet season notifications to any active construction sites before September 1.	--
<b>C.6.e. Inspections</b>	(2) Inspect all sites disturbing 1 acre or more of land and high priority sites monthly during wet season. (3) Inspections shall focus on adequacy and effectiveness of BMPs and shall include assessment of compliance with Permittee's ordinances and permit, assessment of adequacy of BMPs (six categories), visual observation, and education on stormwater pollution prevention as needed. (4) Tracking. Develop construction site inspection database or equivalent tabular format.	N/A	Continue to use tracking spreadsheet.	New Dev	Ongoing	Ongoing	--	Ongoing
<b>C.6.f. Staff Training</b>	Provide training or access to training for staff conducting construction stormwater inspections.	Provide training workshop for construction site inspectors on new MRP requirements.	Send staff to training.	New Dev	Construction Site Inspection Workshop set for April 23rd.	Construction Site Inspection Workshop on April 23rd.	--	--

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<b>C.7.a. Storm Drain Inlet Marking</b>	Permittees shall mark and maintain at least 80% of municipally-maintained storm drain inlets with an appropriate stormwater pollution prevention message. At least 80% of municipally-maintained storm drain inlets must be inspected and maintained at least once per five-year permit term.	N/A	Continue to make sure that at least 80% of municipally-maintained inlets with a no dumping message or equivalent. Inspect and maintain at least 80% of municipally-maintained inlets to ensure that they are legibly labeled once per permit term. Keep track of annual percentages of municipally-maintained inlet markings inspected and maintained as legible, and report prior years' annual percentages in the 2013 Annual Report.	MM	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.7.a.i Storm Drain Inlet Marking</b>	For newly approved, privately-maintained streets, permittees must require inlet marking and maintenance, and verify marking prior to accepting the project.	NA	Continue to require builders to mark inlets on newly approved, privately-maintained streets. Require maintenance of markings by entity responsible for maintaining streets. Verify that newly developed streets are marked prior to acceptance of the project. Keep track of annual number of projects accepted after inlet markings were verified, and report prior years' annual number of projects in the 2013 Annual Report.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.7.d. Stormwater Point of Contact</b>	Permittees shall individually or collectively create and maintain a point of contact to provide the public with information on watershed characteristics and stormwater pollution prevention alternatives.	N/A	Continue to identify a central contact point including phone number for information on stormwater issues. Continue to publicize this number to Permittee staff and the public.	PIP & CII	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.7.e.i, ii Public Outreach Events</b>	Participate in and/or host events such as fairs, shows, workshops, to reach a broad spectrum of the community with stormwater runoff pollution prevention messages, including messages that encourage residents to (1) wash cars at commercial car washing facilities (2) use minimal detergent when washing cars, and (3) divert car washing runoff to landscaped area.	Continue implementation of the OWOW Campaign, which includes tabling events. Continue Program involvement in Home and Garden Shows. Develop and distribute car wash information to agencies.	Continue to provide stormwater runoff pollution prevention messages annually at local events according to population: <10K = 2 events      10,001 - 40K = 3 events 40,001 - 100K = 4 events      100,001 - 175K = 5 events 175,001 - 250K = 6 events      >250K = 8 events ACFCWCD and Zone 7 = 6 events. Help develop and distribute car wash information.	PIP	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.7.e.iii. Public Outreach Events</b>	In each Annual Report, each Permittee shall list the events (name, location and date) participated in and assess the effectiveness of efforts with appropriate measures (e.g., success at reaching a broad spectrum of the community, number of participants compared to previous years, post-event survey results, quantity/volume of materials cleaned up and comparisons to previous efforts).	Report on and provide effectiveness assessments of OWOW tabling events, event partnerships, Alameda County Fair and other countywide events.	Report on and assess the effectiveness of local events.	PIP	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.7.f. Watershed Stewardship Collaborative Efforts</b>	Permittees shall individually or collectively encourage and support watershed stewardship collaborative efforts or community groups and other organizations that benefit the health of the watershed. Report on level of involvement and provide an assessment of effectiveness in each Annual Report.	Report on level of involvement and provide effectiveness assessments.	Continue to fund local "friends of creek" groups if possible. Describe involvement and effectiveness in Annual Reports.	PIP, WAM	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.7.g. Citizen Involvement Events</b>	Permittees shall individually or collectively support citizen involvement events which provide the opportunity for citizens to directly participate in water quality and aquatic habitat improvement, such as creek/bay cleanups, volunteer monitoring, storm drain inlet marking, community grants, etc.	Report on citizen involvement events funded & assess effectiveness.	Continue to sponsor and/or host citizen involvement events annually according to population: <10K = 1 event      10,001 - 40K = 1 event      40,001 - 100K = 2 events      100,001 - 175K = 3 events      175,001 - 250K = 4 events      >250K = 5 events ACFCWCD and Zone 7 = 2 events. Report on citizen involvement events and provide effectiveness assessments of those events.	PIP	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.7.h. School-Age Children Outreach</b>	Permittees shall individually or collectively implement outreach activities designed to increase awareness or stormwater and/or watershed message(s) in school-age children (K through 12).	Report on and provide effectiveness assessments of the educational services programs funded.	Continue conducting school outreach activities. Report on and provide effectiveness assessments of those outreach activities.	PIP	Ongoing	Ongoing	Ongoing	Ongoing

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Subcommittee	Quarterly Check-ins for Permit Compliance and Related Items			
					2014			
					Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
<b>C.7.i. Outreach to Municipal Officials</b>	Permittees shall conduct outreach to municipal officials such as through the use of the Nonpoint Education for Municipal Officials program (NEMO) to significantly increase overall awareness of stormwater and/or watershed message(s) among regional municipal officials at least once per permit cycle.	N/A	Continue to provide stormwater and/or watershed educational information to municipal officials at least once per permit cycle. Report outreach conducted in 2013 Annual Report.	PIP	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.9.a IPM Policy</b>	Adopt and IPM policy or ordinance. Include in Annual Report	NA	Be able to confirm policy/ordinance is in place or adopt. Submit in annual report	Parks Maint. & IPM	--	--	--	--
<b>C.9.b.i IPM Policy</b>	Implement IPM policy or ordinance: The Permittees shall establish written procedures.	NA	Continue to implement establish written standard operating procedures (SOPs).	Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.9.b.ii Pesticides</b>	Permittees shall retain records of IPM SOPs.	NA	Continue to maintain records	Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.9.b.ii Pesticides</b>	Report on implementation of IPM policy.	NA	Report in each Annual Report	Parks Maint. & IPM	--	--	Report in Annual Reports due September 15.	--
<b>C.9.c.i Pesticides</b>	Permittees shall ensure municipal employees are trained in IPM.	NA	Continue to encourage employees to attend IPM training	Parks Maint. & IPM	Program: Provide landscape IPM training on March 12. Agencies: Have staff attend.	Ongoing	Ongoing	Ongoing
<b>C.9.c.ii Pesticides</b>	Report on IPM training	NA	Continue to report on percentage of employees trained and training materials.	Parks Maint. & IPM	--	--	Report in Annual Reports due September 15.	--
<b>C.9.d.i Contractor IPM</b>	Require contractors to implement IPM	NA	Continue to hire certified contractors	Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.9.d.ii Pesticides</b>	Document contractor compliance	NA	Continue to document in AR	Parks Maint. & IPM	--	--	Report in Annual Reports due September 15.	--
<b>C.9.f.i Pesticides</b>	Interface with Co. Ag. Commissioners	Maintain regular contact	Continue to inform Co. Ag. of any pesticide violations	Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.9.f.ii Pesticides</b>	Interface with Co. Ag. Commissioners	Include question in reporting template	Continue to submit summary of any improper pesticide usage reported to Co. Ag.	Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.10.a.ii. Trash: Short term reductions</b>	Submit baseline estimate of trash loading rate from each population based permittee.	N/A	Complete and submit Plan using template	Trash	--	--	--	--
<b>C.10.a.ii. Trash: Short term reductions</b>	Propose exclusion areas	N/A	Optional: Propose areas for exclusion	Trash	--	--	--	--
<b>C.10.a.ii. Trash: Short term reductions</b>	Propose exclusion areas	N/A	Permittee shall collect and submit an additional year of documentation to support exclusion. Required only if Permittee proposed exclusion areas that are commercial, industrial, or high-density residential.	Trash	--	--	--	--
<b>C.10.a.ii. Trash: Short term reductions</b>	Progress Report	N/A	Each Permittee shall submit a progress report indicating individual or collective determination of baseline trash.	Trash	--	--	--	--
<b>C.10.a.iii.</b>	Full Capture Installation	N/A	Install all required full capture devices.	Trash	Ongoing	Installations by July 1, 2014 required to achieve acreage treated requirement.	--	--
<b>C.10.b.i. Trash Hot Spots</b>	Hot Spot Cleanup and Assessment: This task included both cleanup (C.10.b.i) and Assessment (C.10.b.iii).	N/A	Complete annual cleanup and assessment of hotspots	Trash	Ongoing	Ongoing	Submit draft results to EOA. Submit final results in Annual Report.	Ongoing
<b>C.10.c. Trash: Long Term Load Reduction</b>	Long Term Trash Load Reduction	N/A	Developn and submit Long Term Trash Load Reduction Plan	Trash	Long-term trash control plans were submitted on behalf of the permittees on Feb 1st.	--	--	--
<b>C.10.d. Trash Reporting</b>	Reporting on Trash Load Reduction	N/A	Provide summary of trash load reduction actions in each AR	Trash	--	--	Report on progress towards 40% reduction goal in Annual Report.	--

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Subcommittee	Quarterly Check-ins for Permit Compliance and Related Items			
					2014			
					Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
C.11.a Mercury	Mercury Collection and Recycling	Provide guidance on estimating mass of mercury collected	Report on efforts to promote, facilitate and/or participate in collection and recycling and provide annual estimate of mass of mercury collected	WAM	Addressed by SMCWPPP in Annual Report.	Addressed by SMCWPPP in Annual Report.	Addressed by SMCWPPP in Annual Report.	Addressed by SMCWPPP in Annual Report.
C.12.a.ii PCBs	Incorporate PCBs and PCB-containing equipment in industrial inspections	Provide reminders/guidance at subcommittee meetings	Document incidents where PCBs or PCB-containing equipment is identified and refer to appropriate agencies	CII	Ongoing	Ongoing	Ongoing	Ongoing
C.13.a Manage waste generated from cleaning and treating of copper architectural features	ii. (1) The Permittees shall develop BMPs on how to manage the waste during and post-construction. (2) The Permittees shall require use of appropriate BMPs when issuing building permits. (3) The Permittees shall educate installers and operators on appropriate BMPs. (4) The Permittees shall enforce against noncompliance. Report on implementation in 2012 Annual Report.	Prepare flyer on BMPs for installation and maintenance of architectural copper	Require the use of appropriate BMPs when issuing building permits, provide information on the BMPs to installers and operators, and enforce against noncompliance.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
C.13.a.i Copper	Architectural Copper - legal authority to prohibit discharge of wastewater to storm drains from related activities	N/A	If your agency did not certify legal adequacy in September 2011, address this in 2012 Annual Report	New Dev	--	--	--	--
C.13.a.ii(2) Copper	Architectural Copper - require use of appropriate BMPs	Coordinate with BASMAA to include question in 2012 Annual Report form	Report on incorporation in building permit process	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
C.13.a Manage waste generated from cleaning and treating of copper architectural features	iii. In their 2013 Annual Report, the Permittees shall evaluate the effectiveness of these measures, including BMP implementation and propose any additional measures to address this source.	Update deliverable forms for 2012/13 to assist with new reporting requirement.	Report on BMP effectiveness (annual reports submitted September 15, 2013.)	New Dev	--	--	--	--
C.13.a.ii(3) Copper	Architectural Copper - educate installers and operators	Present the new BMPs in construction workshop	Report on education, municipal staff participation in trainings	New Dev	Include in Construction Site Inspection Workshop on April 23rd.	--	--	--
C.13.a.ii(3) Copper	Architectural Copper - enforcement	N/A	Implement enforcement procedures against noncompliance, report on efforts	New Dev	Ongoing	Ongoing	Ongoing	Ongoing
C.13.a.iii(3) Copper	Architectural Copper - evaluate effectiveness	Evaluate implementation and propose any additional measures	Provide input/feedback	New Dev	--	--	--	--
C.13.b.ii Copper	Pools, Spas, Fountains - require sanitary sewer connection or diversion to landscape	N/A	Incorporate in building permit process as appropriate	New Dev	--	--	--	--
C.13.b.iii Copper	Pools, Spas, Fountains - legal authority to prohibit discharge of copper-containing chemicals	N/A	Certify adequate legal authority, or provide justification & schedule for up to 1 additional year to comply	New Dev	--	--	--	--
C.13.d.ii(1) Copper	Industrial Sources - inspection program plan	Provide guidance on facility types	Include facilities likely to use copper or have copper sources	CII	Ongoing	Ongoing	Ongoing	Ongoing
C.13.d.ii(2,3) Copper	Industrial Sources - inspectors	Provide training and/or materials	Continue to educate inspectors, ensure appropriate BMPs	CII	Train staff using Program materials.	Program: Provide training. Agency: Have staff attend training.	Train staff using Program materials.	Train staff using Program materials.
C.13.d.iii Copper	Industrial Sources - Reporting	N/A	Highlight copper reduction results from C.4 section of Annual Report in C.13 section	CII	--	--	Submit results in Annual Report	--
C.15.a. Exempted Non-Stormwater Discharges	In carrying out Discharge Prohibition A.1, certain unpolluted discharges listed in the permit are exempted from the prohibition against non-stormwater discharges.	N/A	Permittees need to determine whether listed discharges should be handled as exempted or conditionally exempted with approval of Water Board.	CII	--	--	--	--

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Subcommittee	Quarterly Check-ins for Permit Compliance and Related Items			
					2014			
					Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec
<b>C.15.b</b> <b>Conditionally Exempted Non-Stormwater Discharges</b>	v.(1) The Permittees shall require that new or rebuilt swimming pools, hot tubs, spas and fountains within their jurisdictions have a connection to the sanitary sewer to facilitate draining events. The Permittees shall coordinate with local sanitary sewer agencies to determine the standards and requirements necessary for the installation of a sanitary sewer discharge location to allow draining events to occur with the proper permits from the local sanitary sewer agency. [No implementation date in permit. Assume this is timed to coincide with new 5/1/2010 Source Control Requirements in Task.C.3-12]	Through the New Development Subcommittee, advise agencies of the need to coordinate with local sanitary sewer authority.	Coordinate with local sanitary sewer agencies to determine standards and requirement that may need to be included in the agency's Source Control Measures List.	New Dev	--	--	--	--
<b>C.15.b.i(1)</b> <b>Conditionally Exempted Non-Stormwater Discharges</b>	<u>Pumped Groundwater from Non Drinking Water Aquifers</u> - Groundwater pumped from monitoring wells, used for groundwater basin management, which are owned and/or operated by the Permittees who pump groundwater as drinking water.	N/A	Permittees who have these types of discharges need to continue complying with the monitoring, BMPs, and reporting requirements listed in this section of the MRP.	CII	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.15.b.i(2)</b> <b>Conditionally Exempted Non-Stormwater Discharges</b>	<u>Pumped Groundwater, Foundation Drains, and Water from Crawl Space Pumps and Footing Drains</u> that are new discharges need to meet requirements listed in this portion of the MRP. This includes reporting to Water Board new, potentially contaminated groundwater with flows of 10,000 gpd or more. The MRP specifies certain monitoring requirements and use of specified BMPs.	N/A	Permittees who have these types of discharges need to continue complying with the monitoring, BMPs, and reporting requirements listed in this section of the MRP.	CII	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.15.b.iii</b> <b>Conditionally Exempted Non-Stormwater Discharges</b>	<u>Planned, Unplanned, and Emergency Discharges of the Potable Water System</u> - The MRP lists prescriptive requirements for use of BMPs, notifications, monitoring, and reporting	N/A	Permittees who have these types of discharges need to continue complying with the monitoring, BMPs, and reporting requirements listed in this section of the MRP.	CII	Collect required discharge monitoring data for each planned potable water discharge. Review the collected data. If benchmark values are exceeded determine if the values are valid and/or if further staff training is required.	Collect required discharge monitoring data for each planned potable water discharge. Review the collected data. If benchmark values are exceeded determine if the values are valid and/or if further staff training is required.	Collect required discharge monitoring data for each planned potable water discharge. Review the collected data. If benchmark values are exceeded determine if the values are valid and/or if further staff training is required.	Collect required discharge monitoring data for each planned potable water discharge. Review the collected data. If benchmark values are exceeded determine if the values are valid and/or if further staff training is required.
<b>C.15.b.v</b> <b>Conditionally Exempted Non-Stormwater Discharges</b>	<u>Swimming Pool, Hot Tub, Spa, and Fountain Water Discharges</u> - Prohibit the discharge of water that contains chlorine residual, copper algaecide, filter backwash or other pollutants. Direct water to sanitary sewer or landscaped areas that can accommodate the volume. Discharges to storm drains only if discharge is properly dechlorinated and there are not other feasible disposal alternatives.	N/A	Permittees who have these types of discharges need to continue requiring that new or rebuilt pools, etc. connect to the sanitary sewer. Continue to improve public outreach and educational efforts regarding the required BMPs, and implement ERPs for polluted discharges.	CII	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.15.b.vi</b> <b>Conditionally Exempted Non-Stormwater Discharges</b>	<u>Irrigation Water, Landscape Irrigation, and Lawn or Garden Watering</u> - promote measures that minimize runoff and pollutant loading from excess irrigation including working with potable water purveyors.	N/A	Permittees will need to continue promoting water conservation, less toxic methods of pest controls, use of drought tolerant vegetation, and appropriate application of water for irrigation as specified in the MRP.	CII, Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.15.b.vii</b> <b>Conditionally Exempted Non-Stormwater Discharges</b>	<u>Additional Discharge Types</u> - Permittees shall identify and describe additional types and categories of discharges not yet listed in Provision C.15.b that they propose to conditionally exempt from Prohibition A.1 in periodic submissions to the Executive Officer.	Identify priority types of additional discharges to request	Assist with identifying and reviewing list of additional priority discharge types.	CII	Ongoing	Ongoing	Ongoing	Ongoing
<b>C.16.a Annual Reports</b>	Submit Annual Reports	Submit Annual Report on General Program Activities	Submit Annual Report on previous fiscal year activities	TAC	--	--	Submit draft agency Annual Reports to EOA for review. Agency and SMCWPPP Annual Reports to be submitted to Regional Water Board by September 15.	--



# **NPDES Technical Advisory Committee AGENDA REPORT**

**Date:** July 15, 2014  
**Item:** 4F  
**From:** Matthew Fabry, Program Coordinator  
**Subject:** Other Issues, Subcommittee Updates

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## **SUMMARY**

Staff will provide verbal updates on any other relevant issues, along with the attached written materials.

## **ATTACHMENTS**

- Upcoming Meetings Summary
- Recent Subcommittee Meeting Minutes

## **Upcoming Meetings, Work Shops, Trainings, etc. for Each Countywide Program Component**

### **MEETINGS**

- Stormwater Committee – meets at 2:30 pm, third Thursday of the month, as needed. Next meeting is July 17, San Mateo County Transit District Office, City of San Carlos.
- Technical Advisory Committee –meets 10 am to noon, third Tuesday of the month, quarterly. Next meeting is July 15, City of San Mateo Main Library.
- New Development – subcommittee meets 1:30 to 3:30 pm, second Tuesday of the month, quarterly. Next meeting is August 12, Redwood Shores Library in Redwood City.
- Public Information/Participation – subcommittee meets 10:00 am to noon, second Tuesday of every other month. Next meeting is August 12, Belmont City Hall, second floor EOC.
- Municipal Maintenance – subcommittee meets noon to 1:00 pm (\$10.00 lunch), fourth Wednesday of the month, quarterly. Next meeting is August 27 at the City of Millbrae library.
- Parks Maintenance and Integrated Pest Management – work group meets 1:30 to 3:00 pm, fourth Tuesday of the month, three times per year. Next meeting is August 26 at the City of Redwood City’s Community Activities Building.
- Trash Control – subcommittee meets as needed. Next meeting is TBD.
- Litter Work Group – usually meets monthly, but date and time varies. Next meeting TBD.
- Commercial/Industrial/Illicit Discharge Control – subcommittee meets 1:00 to 2:30 pm, third Wednesday of the month, quarterly. Next meeting is September 17 at San Mateo County Environmental Health, City of San Mateo.
- Watershed Assessment and Monitoring – subcommittee meets 10:00 am to noon, second Thursday of the month, approximately two times per year. Next meeting date tentatively set for February 12, 2015 at San Mateo County Environmental Health, City of San Mateo.

### **WORKSHOPS**

- Annual New Development Workshop – Spring 2015
- Annual Construction Inspection Workshop – Spring 2015
- Litter Roundtable No. 2 – Winter 2014/15

## **DRAFT CII Subcommittee Report**

**Meeting Date:** June 18, 2014

**Subcommittee Actions:**

- Agreed that the March 2014 subcommittee meeting summary was acceptable.

**Requested Action or Feedback/Guidance (if any):** None.

**Other Information/Announcements:**

- **Update on County Environmental Health (CEH) Inspections.** Third quarter inspection summary data for the cities will be posted on the SMCWPPP “Flows to Bay” website ([www.flowstobay.org](http://www.flowstobay.org)) by the end of the month. The fourth quarter and annual inspection summary data for the cities will be posted in late July. CEH inspectors will be switching to electronic reporting in the near future. This should improve the data summary process.
- **Update on BASMAA’s Municipal Operations Committee.** BASMAA has an approved regional project to expand the current surface cleaner training and recognition program to include automotive washing and carpet cleaning businesses and create a web-based application to share information about mobile businesses. The Subcommittee provided comments in December on the draft BMPs for carpet cleaners and transportation related cleaning activities. In May the Subcommittee provided comments on the draft data entry page for enforcement sharing information. The BASMAA Muni Ops committee met via conference call on June 3<sup>rd</sup>. Geoff would like to resolve the contradicting comments received on the draft BMPs. He will send an email to Program leads with the cities he would like to engage. There has been no further work on the project.
- **Countywide Repository of Mobile Contractors in Violation.** Due to the long delays in the BASMAA mobile surface cleaner project, the Subcommittee will continue to move forward on its own to meet the MRP Provision C.5.d Control of Mobile Sources. Kristin sent a request to the Subcommittee for agencies to submit any recent enforcement information on mobile businesses. The enforcement information was compiled in an Excel table and was posted on the members only web page of the CII Subcommittee. An email was sent to the Subcommittee to let members know where it is posted and how they can add businesses to the table. The Subcommittee decided the next step would be to compile an inventory of mobile businesses operating in the County. Kristin will email the Subcommittee for a list of mobile businesses they have knowledge of from business license data or inspector referrals after the Annual Reports are submitted.

Mobile food trucks must register with CEH if they will be working in San Mateo County. The food trucks come to CEH on designated days to be inspected and receive a permit. Patrick Ledesma will see if a CEH staff person could come to the next Subcommittee meeting to discuss their program. Patrick will also get more information on how the Certified Food Handler training program is implemented in the County. There may be an opportunity to add a stormwater pollution prevention message in this required training.

- **BMP Brochures Updates.** A priority list for revising the BMP brochure pieces on the SMCWPPP website was developed based on Subcommittee survey results, the age of the document, ease of revisions or updates, and accessibility of editable documents. The two pieces that were next on the priority list were BMPs for Supermarkets & Grocery Stores and Recycle Mercury Containing Lamps – It’s the Law! The pieces were revised, emailed to the Subcommittee for comments and finalized. The two pieces will be posted to the SMCWPPP website. The mercury piece will be posted as a 1 page flyer and a tri-fold brochure. The grocery store piece will be posted as a tri-fold brochure formatted for reading on-line. Agencies can contact Kristin if they would like a copy of the brochure formatted for printing as a tri-fold brochure.

The Subcommittee decided that the PIP or Parks Maintenance and IPM Subcommittees were better suited to review and update, if needed, the Less Toxic Pest Control Services brochure. The Subcommittee decided the Why do People Dump Trash in Creeks piece is a low priority for review. The next few pieces on the priority list are all pieces that were done by graphic design contractors. If any revisions are needed the original graphic design company would need to be hired to make the revisions or the piece would need to be redone. The pieces would require a larger level of effort to revise. Kristin will send out an email survey to determine whether the group would like to update these next pieces.

- **Construction BMP Brochure.** The New Development Subcommittee (NDS) would like to remove the Home Repair and Remodeling BMP brochure from the SMCWPPP website. The CII Subcommittee does not have any objection to this brochure being removed from the website.
- **Daly City Audit.** Selina Louie, Regional Board staff, informed Daly City that she would be auditing their MRP Provision C.5 stormwater program elements. She requested a copy of their ERP and illicit discharge tracking table in advance. The city had updated their ERP based on the memo *Guidance on Review of Enforcement Response Plans and Business Inspection Plans* emailed to the Subcommittee on July 8, 2013. Also in advance of the audit she looked on the city’s website to find how an illicit discharge could be reported and if the MS4 map was publicly available. During the audit she reviewed each C.5 permit requirement with the city. Specifically she asked about the city’s mobile business program and if there was a procedure for receiving a complaint and how the city would conduct enforcement. She compared the FY12/13 Annual Report data submitted with the illicit discharge tracking table the city provided. The audit went well but the city is waiting for the final report from the Regional Board staff.
- **CII Training Workgroup.** Patrick attended the Training Workgroup meeting. The Subcommittee agreed not to have the regularly scheduled Training Workgroup meetings unless there was a request or need. The April 17 Workshop evaluation summary was provided in the agenda packet. There were no further comments on the Workshop from the Subcommittee. The workshop materials are posted on the SMCWPPP website. The FY14/15 budget does not have budget for a training workshop. Patrick is working on a web based stormwater training module for CEH inspectors. The training will be based on the

presentations from the previous workshop. Patrick offered to include materials or text provided by city staff.

- **Other Information:** There will be no Annual Report training for the sections that apply to the CII Subcommittee. Members were encouraged to call Kristin with any questions about the Annual Report.

**Subcommittee Work That Affects Other Subcommittees:** None.

**Next Steps:**

- Kristin will email the Subcommittee for a list of mobile businesses they have knowledge of from business license data or inspector referrals after the Annual Reports are submitted.
- Kristin will post the final mercury and grocery store BMP pieces on the SMCWPPP website.
- Kristin will survey the group by email to determine whether the Automotive Service Poster, Clean It Right poster or Restaurant BMPs outreach piece should be updated.
- Patrick will see if a CEH staff person could come to the next Subcommittee meeting to discuss their food truck permitting program.
- Patrick will get more information on how the Certified Food Handler training program is implemented in the County.

**Next Meeting Date:** The Subcommittee is scheduled to meet next on Wednesday September 17, 2014 at 1:00 pm.

## **Watershed Assessment and Monitoring (WAM) Subcommittee Report**

**Meeting Date:** June 12, 2014

**Attendees:** Bonnie de Berry, EOA, Inc.; Jon Konnan, EOA, Inc.; Eva Justimbaste, Burlingame ; Adrian Lee, Redwood City; Paul Baker, San Carlos; Rob Lecel, South San Francisco; Sarah Scheidt, City of San Mateo; Julie Casagrande, County of San Mateo; Patrick Ledesma, County of San Mateo.

**Subcommittee Action Items:** Approval of summary minutes from January 9, 2014 WAM meeting.

**Requested Technical Advisory Committee Action or Feedback/Guidance (if any):** None.

### **Introductions, Announcements:**

- Patrick Ledesma described the new inspector resources page on SMCWPPP's web site ([www.flowstobay.org](http://www.flowstobay.org)). The page is not password protected but there are no links to it. Patrick provided the URL and asked that the group look at the page and provide feedback.

### **Municipal Regional Permit (MRP) Provision C.8:**

Bonnie gave a presentation covering specific parts of MRP Provision C.8 – Water Quality Monitoring. This provision is implemented by SMCWPPP on behalf of all San Mateo County MRP Permittees.

- Provision C.8 Overview – There are six primary elements of C.8 plus reporting. SMCWPPP is part of the Bay Area-wide Regional Monitoring Coalition (RMC). We are nearing the third year of water quality monitoring.
- Creek Status Monitoring – MRP Provision C.8.c. Bonnie described the Creek Status Monitoring Management Questions, RMC and SMCWPPP strategies to answer the questions (i.e., regional probabilistic vs. local targeted monitoring), and associated monitoring requirements. Receiving water condition is assessed through bioassessment monitoring (i.e., benthic macroinvertebrates) at probabilistic sites. The probabilistic design randomly selects sites throughout the County, with a focus on urban sites. Targeted sites are selected at the discretion of SMCWPPP staff and Permittees are given the opportunity to provide feedback. A map showing all sampling stations and sampling parameters in WY2012, WY2013, and WY2014 was handed out to the group. Monitoring results as they relate to trigger thresholds from the MRP were summarized.
  - Patrick suggested below Emerald Lake on a tributary to Arroyo Ojo de Agua as a possible pathogen indicator monitoring site.
  - Eva asked that SMCWPPP documents distinguish between Sanchez Creeks in Burlingame and Pacifica.
- Monitoring Projects – MRP Provision C.8.d. Bonnie provided an update on the status of each of the three types of projects included in this MRP provision:

- Stressor/Source Identification: SMCWPPP is required to conduct two SSID studies based on Creek Status monitoring results. The two projects being implemented are both in San Mateo Creek. One project investigates low dissolved oxygen which was observed in historical monitoring conducted in 2007 by SWAMP and confirmed in WY2013 through Creek Status monitoring. The other project consists of a microbial source tracking (MST) approach (i.e., Bacteroidales genetic markers) to identify sources of bacterial pathogen indicators. Field investigations for both projects are currently underway.
- BMP Effectiveness Investigation: This project is being implemented in coordination with the pilot Green Street (per MRP Provision C.3) and stormwater treatment retrofit for PCBs and mercury removal project (per MRP Provisions C.11/12) on Bransten Road in San Carlos. Per the MRP (Provision C.8.d) typical urban runoff constituents have been added to the PCBs/mercury study. Monitoring began in winter of WY2014 and will continue into WY2015.
- Geomorphic Project: Bankfull dimensions in the Middle Fork of San Pedro Creek were surveyed in November 2013. The results will be used to develop Regional Curves of equilibrium channel conditions, which is useful information for future creek restoration projects. SMCWPPP coordinated with a local watershed group in Pacifica and San Francisco State University to conduct the study.
- Pollutant of Concern Loads Monitoring– MRP Provision C.8.e. - Pollutant of Concern (POC) loads to the Bay from small tributaries are monitored under this program. PCBs and Hg are the main POCs of interest. There are six regional sites, one of which is in San Mateo County at the Pulgas Creek pump station in San Carlos. A total of seven samples have been collected to-date but few of the analytical results are available at this time.
- Reporting – MRP Provision C.8.g. Bonnie and Jon briefly described the reporting process. In most years MRP C.8 data are reported in an Urban Creeks Monitoring Report due March 15. Per MRP requirements, in 2014 a more comprehensive analysis was conducted and documented in the Integrated Monitoring Report.

### **PCBs and Mercury Opportunity Area analysis and Implementation Planning:**

Jon gave a presentation covering PCB and Mercury TMDL implementation. He summarized what has been done to-date and described next steps. Gathering data to inform development of the next MRP (MRP 2.0) will be a major focus of SMCWPPP over the next several months. Members of the WAM Subcommittee (and others) who represent the nine San Mateo County municipalities with relatively large amounts of old industrial land use are being asked to join the PCBs and Mercury Workgroup. The Workgroup will assist in efforts to identify high opportunity areas with PCB and/or mercury sources where focused control measure implementation could occur during MRP 2.0. Jon described the Draft Work Plan which outlines these efforts. Maps showing parcels with priority land uses (i.e., old industrial, old electrical, recycling, railroads, military) were passed out to the Workgroup. The Workgroup is being asked to use reconnaissance and local municipal staff knowledge to help refine a data spreadsheet which is a companion to the maps. The Workplan's appendices include a guidance to the municipalities with step-by-step instructions for updating the data spreadsheet. SMCWPPP staff will use the updated data spreadsheet to refine the maps and plan field monitoring which will

take place this fall to further identify source areas. The Work Plan, data spreadsheet, electronic versions of the maps, and other materials will be emailed to the group in the near future.

- Patrick mentioned the “brown folder files” housed at County Environmental Health which may contain information on contaminated properties that are not included in the Envirostor or Geotracker databases.

**Subcommittee Work That Affects Other Subcommittees:** None

**Next Meeting Date:** The next meeting will be scheduled for the second Thursday of January or February 2015, 10 am – noon at the San Mateo County Health Department’s offices. A confirming email will be distributed in advance.

DRAFT