

C.2 Municipal Operations

The purpose of this provision is to ensure implementation of appropriate BMPs by all Permittees to control and reduce non-stormwater and polluted stormwater discharges to storm drains and watercourses during operation, inspection, and routine repair and maintenance activities of municipal facilities and infrastructure.

C.2.a. Street and Road Repair and Maintenance

i. Task Description – Asphalt/Concrete Removal, Cutting, Installation, and Repair

The Permittees shall implement appropriate BMPs, ~~such as those described in the California Stormwater Quality Association (CASQA) Municipal Stormwater BMP Handbook and Construction Stormwater BMP Handbook~~, at street and road repair and/or maintenance sites to control debris and waste materials during road and parking lot installation, repaving, repair, or maintenance activities.

Commented [A1]: Recommend deleting references to specific BMPs in the permit language. Such suggestions could be included in the Fact Sheet.

ii. Implementation Levels

- (1) The Permittees shall require proper management of concrete slurry and wastewater, asphalt, pavement cutting, and other street and road maintenance materials and wastewater to avoid discharge to storm drains from such work sites. The Permittees shall coordinate with sanitary sewer agencies to determine if wastewater generated from road construction, repair, and maintenance activities may be discharged to the sanitary sewer system, provided appropriate approvals are obtained and pretreatment standards are met.
- (2) The Permittees shall require sweeping and/or vacuuming to remove debris, concrete, or sediment residues from work sites upon completion of work. The Permittees shall require cleanup of all construction debris, spills, and leaks using dry methods (e.g., absorbent materials, rags, pads, and vacuuming), ~~as described in the most current active training opportunity, such as the former Bay Area Stormwater Management Agencies Association (BASMAA) Blueprint for a Clean Bay or the CASQA Municipal Stormwater BMP Handbook.~~

Commented [A2]: Recommend deleting references to specific BMPs in the permit language. Such suggestions could be included in the Fact Sheet.

iii. Reporting

- (1) The Permittees shall report on implementation of and compliance with these BMPs in the Annual Report.
- (2) Permittees shall make applicable supporting BMP documents available to Water Board staff or representatives during audits or inspections, and upon request.

C.2.b. Sidewalk/Plaza Maintenance and Pavement Washing

- i. **Task Description** – The Permittees shall implement and require to be implemented BMPs that prevent the discharge of polluted wash water and non- stormwater to storm drains from pavement, sidewalk and plaza cleaning, mobile cleaning, outdoor pressure washing operations, and washing down of trash areas and gas station or mobile fueling service areas. BMPs for washing down outside areas of human habitation shall include sanitizing procedures. The Permittees shall implement BMPs such as those included in the ~~BAMSCSMAA~~ Mobile Surface Cleaner Program. The Permittees shall coordinate with sanitary sewer agencies to determine if disposal to the sanitary sewer is available for the wastewater generated from these activities provided that appropriate approvals and pretreatment standards are met.

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ii. **Reporting**

- (1) The Permittees shall report on implementation of and compliance with these BMPs in the Annual Report.
- (2) Permittees shall make applicable supporting BMP documents available to Water Board staff or representatives during audits or inspections, and upon request.

C.2.c. Bridge and Structure Maintenance and Graffiti Removal

i. **Task Description**

- (1) The Permittees shall implement appropriate BMPs to prevent the discharge of polluted stormwater and non-stormwater from bridges and structural maintenance activities directly into surface waters or storm drains.
- (2) The Permittees shall implement BMPs for graffiti removal that prevent non-stormwater and wash water discharges into storm drains.

ii. **Implementation Levels**

- (1) The Permittees shall prevent all debris and pollutants, including structural materials and coating debris, such as paint chips, generated in bridge and structure maintenance or graffiti removal, from entering storm drains or water courses.
- (2) The Permittees shall protect nearby storm drain inlets before removing graffiti from walls, signs, sidewalks, or other structures. The Permittees shall prevent any discharge of debris, cleaning compound waste, paint waste, or wash water due to graffiti removal from entering storm drains or watercourses.

- (3) The Permittees shall use proper disposal methods for wastes generated from these activities. The Permittees shall train their employees and/or specify in contracts the proper capture and disposal methods for the wastes generated.

iii. Reporting

- (1) The Permittees shall report on implementation of and compliance with these BMPs in the Annual Report.
- (2) Permittees shall make applicable supporting BMP documents available to Water Board staff or representatives during audits or inspections, and upon request.

C.2.d. Stormwater Pump Stations

i. Task Description –The Permittees shall implement measures to operate, inspect, and maintain stormwater pump stations to eliminate non-stormwater discharges containing pollutants, and to reduce pollutant loads in stormwater discharges to comply with WQS.

ii. Implementation Levels – The Permittees shall comply with the following at Permittee-owned or -operated pump stations:

- (1) Upon becoming aware that the discharge from a pump station has a dissolved oxygen (DO) concentration below 3.0 mg/L, implement corrective actions, such as continuous pumping at a low flow rate, aeration, or other appropriate methods to maintain DO concentrations of the discharge above 3 milligrams per liter (mg/L) and verify the effectiveness of the corrective actions with monitoring. Corrective actions are not necessary for discharges from pump stations that remain in the stormwater collection system or infiltrate into a dry creek immediately downstream.
- (2) Ensure that pump stations are free of debris and trash, replace any oil-absorbent booms, as needed, and investigate and abate illicit discharges. Pump stations excluded from C.2.d.ii.(1) above are not excluded from this requirement.
- (3) The Permittees shall maintain records of inspection, maintenance, implementation of corrective actions, and any monitoring records at Permittee-owned or -operated pump stations. These records shall be made available to Water Board staff or its representatives during inspections and audits, or otherwise upon request.

C.2.e. Rural Public Works Construction and Maintenance

i. Task Description – Rural Road and Public Works Construction and Maintenance

For the purpose of this provision, rural means any watershed or portion thereof that is developed with large lot home-sites, such as one acre or larger, or with primarily agricultural, grazing, or open space uses. Rural roads include paved, unpaved, utility, and access roads in rural areas. The Permittees shall implement and require contractors to implement BMPs for erosion and sediment control during and after construction for maintenance activities on rural roads, such as those in the CASQA Construction Stormwater BMP Handbook, particularly in or adjacent to stream channels or wetlands. The Permittees shall notify the Water Board, the California Department of Fish and Wildlife (CDFW), and the U.S. Army Corps of Engineers, where applicable, and obtain appropriate agency permits for rural public works activities before work in or near creeks and wetlands.

San Mateo County has additional rural road requirements for the Pescadero-Butano Sediment TMDL described in Provision C.18 and shall also implement that provision.

ii. Implementation Level

- (1) The Permittees shall continue to implement erosion and sediment control BMPs, in addition to those described in Provision C.2.a, during construction and maintenance activities on rural roads, including developing and implementing appropriate training and technical assistance resources for rural public works activities.
- (2) The Permittees shall implement appropriate BMPs to minimize impacts on streams and wetlands in the course of rural road and public works maintenance and construction activities by:
 - (a) Selecting road design, construction, maintenance, and repairs in rural areas that prevent and control road-related erosion and sediment transport;
 - (b) Identifying and prioritizing rural road maintenance on the basis of soil erosion potential, slope steepness, and stream habitat resources;
 - (c) Constructing roads and culverts that do not impact creek functions. New or replaced culverts shall not create a migratory fish passage barrier, where migratory fish are present, or lead to stream instability;
 - (d) Implementing an inspection program to maintain rural roads' structural integrity and prevent impacts to water quality;

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- (e) Maintaining rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts, and address excessive erosion;
 - (f) Re-grading unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate; and
 - (g) Replacing existing culverts or design of new culverts or bridge crossings shall use measures to reduce erosion, provide fish passage, and maintain natural stream geomorphology in a stable manner.
- (3) The Permittees shall incorporate information about the importance of planning and construction in avoiding water quality impacts into existing training and guidance on permitting requirements for rural public works activities.
- (4) The Permittees shall provide training incorporating these BMPs to rural public works maintenance staff at least twice within this Permit term.

iii. Reporting – The Permittees shall report on the implementation of and compliance with BMPs for rural public works construction and maintenance activities, including reporting on increased maintenance in priority areas, in the Annual Report.

C.2.f. Corporation Yard BMP Implementation

i. Task Description – Corporation Yard Maintenance

- (1) The Permittees shall implement and maintain a site-specific Stormwater Pollution Prevention Plan (SWPPP) for corporation yards, including municipal vehicle and heavy equipment maintenance yards and parking areas, and material storage facilities, to comply with water quality standards. Each SWPPP shall incorporate all appropriate BMPs, ~~such as those described in the current versions of the CASQA Municipal Stormwater BMP Handbook or the Caltrans Storm Water Quality Handbook Maintenance Staff Guide, and addenda.~~
- (2) The requirements in this provision shall apply only to facilities that are not covered under the State Water Board’s Industrial Stormwater NPDES General Permit.

Commented [A4]: OK to keep, but at least in Alameda County, there are no unpaved municipally owned rural roads.

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ii. Implementation Level

- (1) Implement BMPs to minimize pollutant discharges in stormwater and prohibit non-stormwater discharges, such as wash waters from street sweepers, vacor trucks, or other related equipment. Pollution control actions shall include, but not be limited to, good housekeeping practices, material and waste storage control, and vehicle leak and spill control.
- (2) Routinely inspect corporation yards to ensure that non-stormwater discharges are not entering the storm drain system and that pollutant discharges are prevented to the maximum extent practicable. At a minimum, each corporation yard shall be fully inspected each year between August 1 and September 30. Permittees shall cease or cause to be ceased any active non-stormwater discharges immediately after they are discovered. Corrective actions shall be implemented before the next rain event, but no longer than 10 business days after the potential and/or actual discharges are discovered. Corrective actions can be temporary, in which case more time can be allowed for permanent corrective actions. If more than 10 business days are required for compliance, a rationale shall be recorded.
- (3) Plumb all vehicle and equipment wash areas to the sanitary sewer after coordination with the local sanitary sewer agency and equip with a pretreatment device (if necessary) in accordance with the requirements of the local sanitary sewer agency. In areas where a sanitary sewer connection is not available, the Permittees shall collect and haul the wash water to an alternative sanitary sewer connection or municipal wastewater treatment plant, or implement appropriate BMPs to collect, properly treat, and reuse wash water onsite without any discharge.
- (4) Use dry cleanup methods when cleaning debris and spills from corporation yards. If wet cleaning methods must be used (e.g., pressure washing), the Permittee shall ensure that wash water is collected and disposed in the sanitary sewer after coordination with the local sanitary sewer agency and in accordance with the requirements of the local sanitary sewer agency. Any private companies hired by the Permittee to perform cleaning activities on Permittee-owned property shall follow the same requirements. In areas where a sanitary sewer connection is not available, the Permittees shall collect and haul the wash water to a municipal wastewater treatment plant, or implement appropriate BMPs and dispose of the wastewater to land in a manner that does not adversely impact surface water or groundwater.

- (5) Outdoor storage areas containing pollutants shall be covered and/or bermed to prevent discharges of polluted stormwater runoff or run-on to storm drain inlets.

iii. Reporting

- (1) In each Annual Report, Permittees shall list activities conducted in the corporation yards that have BMPs in the site-specific SWPPP, the date(s) of inspections, the results of inspections, and any follow-up actions, including the date of any necessary corrective actions implemented. The information may be reported in a narrative or tabular format.
- (2) In the 2023 Annual Report, Permittees shall make their corporation yard SWPPPs available to the Water Board by providing links to online documents or submitting the documents as part of the Annual Report.

C.2.g. Storm Drain Inlet Marking

- i. **Task Description** – Permittees shall mark and maintain municipally-maintained storm drain inlets with an appropriate stormwater pollution prevention message, such as “No dumping, drains to Bay” or equivalent. For newly approved, privately maintained streets, Permittees shall require storm drain inlet markings with an appropriate stormwater pollution prevention message by the project developer upon construction and maintenance of markings through the development maintenance entity. Markings on the storm drain inlets shall be verified prior to acceptance of the project.

ii. Implementation Level

- (1) Inspect and maintain storm drain inlet markings of at least 80 percent of municipality-maintained inlets to ensure they are legibly labeled with a no dumping message or equivalent once per permit term.
- (2) Storm drain inlet markings of newly developed, privately maintained streets shall be verified prior to acceptance of the project. Permittees shall require maintenance of the storm drain inlet markings through the development maintenance entity.
- (3) ~~Confirm~~ Certify that all privately maintained streets had storm drain inlet markings verified prior to acceptance of the project and were required to maintain the storm drain inlet markings through the development maintenance entity.

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- iii. **Reporting** – In the 2026 Annual Report, each Permittee shall (1) state how many municipally-maintained storm drain inlets it has; (2) confirm that at least 80 percent of municipality-maintained storm drain inlet markings are legibly labeled with an appropriate stormwater pollution prevention message during the permit term; and (3) include a picture of a labeled municipality-maintained inlet.

C.2.h. Staff Training

- i. **Task Description** – Permittees shall ensure municipal maintenance staff conducting routine repair and maintenance activities of municipal facilities and infrastructure, or activities related to the implementation of corporation yard SWPPPs, are appropriately trained on the requirements of Provision C.2 and methods of implementation. Trainings may be program-wide, region-wide, or Permittee-specific.
- ii. **Implementation Level** – At a minimum, provide training at least once within the 5-year term of this Permit to municipal staff on the following topics as relevant to municipal staff responsible for maintenance activities:
 - (1) Stormwater pollution prevention;
 - (2) Appropriate BMPs for maintenance and cleanup activities;
 - (3) Street and Road Repair and Maintenance BMPs;
 - (4) Sidewalk/Plaza Maintenance and Pavement Washing;
 - (5) Bridge and Structure Maintenance and Graffiti Removal;
 - (6) Corporation Yard SWPPPs and BMPs; and
 - (7) Spill and discharge response and notification procedures and contacts.
- iii. **Reporting** – The Permittees shall include the following information in each Annual Report:
 - (1) Dates of training;
 - (2) Training topics covered;
 - (3) Total number of Permittee maintenance staff;
 - (4) Number ~~and percentage~~ of Permittee maintenance staff who attended training;
 - (5) If there was no training in a given year, so state.

C.4. Industrial and Commercial Site Controls

Each Permittee shall implement an industrial and commercial site control program at all sites that could reasonably be considered to cause or contribute to pollution of stormwater runoff. Permittees shall conduct inspections, effective follow-up, and enforcement to abate potential and actual non-stormwater discharges, consistent with each respective Enforcement Response Plan. These combined efforts will prevent the discharge of pollutants and impacts to beneficial uses of receiving waters. Inspections shall confirm implementation of appropriate and effective BMPs and other pollutant controls by industrial and commercial site operators.

C.4.a. Legal Authority for Effective Site Management

- i. **Task Description** – Permittees shall have sufficient legal authority to inspect, require effective stormwater pollutant control, and implement progressively stricter enforcement to achieve expedient compliance and pollutant abatement at commercial and industrial sites within their jurisdiction.
- ii. **Implementation Level** – Permittees shall have the legal authority to oversee, inspect, and require expedient compliance and pollution abatement at all industrial and commercial sites that may be reasonably considered to cause or contribute to pollution of stormwater runoff. Permittees shall have the legal authority to require implementation of appropriate BMPs at industrial and commercial facilities to address pollutant sources associated with outdoor process and manufacturing areas; outdoor material storage areas; outdoor waste storage and disposal areas; outdoor vehicle and equipment storage and maintenance areas; outdoor parking areas and access roads; outdoor wash areas, for example, areas used to wash restaurant equipment and mats; outdoor drainage from indoor areas; rooftop equipment; vehicle fueling activities; contaminated and erodible surface areas; and other sources determined by the Permittees or the Water Board Executive Officer to have a reasonable potential to contribute to pollution of stormwater runoff.

C.4.b. Industrial and Commercial Business Inspection Plan (Inspection Plan)

- i. **Task Description** – Permittees shall continue to update and implement an Inspection Plan that will serve as a prioritized inspection workplan. This Inspection Plan will allow inspection staff to categorize the commercial and industrial sites within the Permittee's jurisdiction by pollutant threat and inspection frequency, change inspection frequency based on site performance, and add and remove sites as businesses open and close.

ii. Implementation Level

(1) Facilities to Prioritize for Inspection

Commercial and industrial facilities with the functional aspects and types described below, and other facilities identified by the Permittees as reasonably likely to contribute to pollution of stormwater runoff, shall be prioritized for inspection on the basis of the potential for water quality impact using criteria such as pollutant sources on site, use of pollutants of concern, proximity to a waterbody, and the enforcement history of potential discharges and actual discharges at the facility. Permittees may use a variety of sources to develop and update the business inspection prioritization, including, but not limited to, business license applications, tax records, and inspectors' observations. The following are some of the functional aspects of businesses and types of businesses that shall be included in the Inspection Plan:

- (a) Sites with the following functions or facilities that may be sources of pollutants when exposed to stormwater:
 - (i) Outdoor process and manufacturing areas
 - (ii) Outdoor material storage areas
 - (iii) Outdoor waste storage, handling, and disposal areas
 - (iv) Outdoor vehicle and equipment storage and maintenance areas
 - (v) Outdoor wash areas
 - (vi) Outdoor drainage from indoor areas
 - (vii) Fueling Areas
 - (viii) Rooftop equipment
 - (ix) Other sources determined by the Permittee or Water Board as reasonably likely to contribute to pollution of stormwater runoff.
- (b) Sites that support industrial and commercial activities that have a reasonable likelihood to be sources of pollutants to stormwater and non-stormwater discharges, including:
 - (i) Industrial facilities, as defined at 40 CFR 122.26(b)(14), including facilities subject to the Statewide NPDES General Permit for Stormwater Discharges Associated with Industrial Activity (hereinafter the Industrial General Permit);
 - (ii) Vehicle Salvage yards;

- (iii) Metal and other recycled materials collection facilities, and waste transfer facilities;
 - (iv) Vehicle mechanical repair, maintenance, fueling, or cleaning facilities;
 - (v) Nurseries and greenhouses;
 - (vi) Restaurants and other food service businesses at which food is prepared or that have onsite eating and drinking areas for customers;
 - (vii) Supermarkets or large grocery stores with outdoor waste storage or cardboard compacting areas;
 - (viii) Building trades facilities or yards, corporation yards;
 - (ix) Building material retailers and storage;
 - (x) Plastics manufacturers; and
 - (xi) Other facilities designated by the Permittee or Water Board to be reasonably likely to contribute to pollution of stormwater runoff.
- (2) Inspection Plan – The Inspection Plan shall be updated annually and shall contain the following information:
- (a) A description of the process for prioritizing inspections and frequency of inspections. The prioritization criteria shall assign a more frequent inspection schedule to the highest priority facilities per Provision C.4.b.ii.(1). If any geographical areas are to be targeted for inspections due to high potential for stormwater pollution, these areas should be indicated in the Inspection Plan.
 - (b) Assign appropriate inspection frequency for each industrial and commercial facility based on the priority established in Provision C.4.b.ii.(2)(a), potential for contributing pollution to stormwater runoff, and commensurate with the threat to water quality.
 - (c) A mechanism to include new businesses that warrant inspections.
 - (d) Total number and a list of all industrial and commercial facilities requiring inspections, within each Permittee’s jurisdiction, based on the prioritization criteria established in Provision C.4.(b)ii.(2)(a). This list shall be updated annually.
 - (e) List of facilities scheduled for inspection each fiscal year of the MRP permit term. Each fiscal year’s inspection list shall be added to the Inspection Plan at the beginning of the fiscal year as part of the annual

update. Previous fiscal years' inspection lists shall remain in the Inspection Plan.

- (f) If a Permittee relies on multiple entities to perform business and commercial inspections, a list of the entities and their responsibilities with regard to this Permit. Describe how the Permittee oversees and coordinates the entities performing inspections and assures that all sites with the potential to pollute stormwater are inspected.
- (3) Record Keeping – For each facility identified in Provision C.4.b.ii.(2)(d), the Permittee shall maintain a database or equivalent tabular system of at least the following information:
- (a) Name and address of the business and local business operator;
 - (b) A brief description of business activity or pollutant source, including SIC or NAICS code. Examples: outdoor process/manufacturing areas, outdoor material storage areas, outdoor waste storage and disposal areas, outdoor vehicle and equipment storage and maintenance areas, outdoor parking areas and access roads, outdoor wash areas, rooftop equipment, outdoor drainage from indoor areas, and use of mobile businesses for outdoor fueling, washing, etc.;
 - (c) Inspection priority and inspection frequency; and
 - (d) Whether facility requires coverage under the Industrial General Permit.

iii. Reporting

~~(1) Permittees shall include the following information in the 2023 Annual Report:~~

- ~~(a) A brief description of which Permittee entity or entities are responsible for reviewing and approving business license applications or a link to the Permittee's website for business license applications.~~

~~(2)~~(1) Permittees shall make the list required by Provision C.4.b.ii.(2)(d) available upon Water Board request.

C.4.c. Enforcement Response Plan

- i. Task Description** – Each Permittee shall implement and update, as needed, its Enforcement Response Plan (ERP), a reference document to guide inspection staff in achieving timely and effective compliance from all commercial and industrial site operators.

ii. Implementation Level – The ERP shall contain the following:

- (1) **Enforcement Procedures** – A description of the Permittee’s enforcement and compliance procedures, from the discovery of problems through the confirmation of implementation of corrective actions. This shall include guidance for appropriate enforcement actions, follow-up inspections, referrals to another agency, appropriate time periods for implementation of corrective actions, and the roles and responsibilities of all persons responsible for implementing the ERP.
- (2) **Enforcement Tools and Field Scenarios** – A discussion of the various, escalating enforcement tools for different field scenarios, including, but not limited to, potential discharges (e.g., housekeeping issues, inadequate waste or materials management, evidence of actual discharges, lack of emergency response plans, lack of BMPs, inadequate BMPs, and inappropriate BMPs); actual discharges (observed or documented flow of unauthorized, illicit, or pollutant-containing stormwater discharges to the MS4); non-compliance with previous enforcement actions; and sites with a history of potential and/or actual discharges.
- (3) **Timely Correction of Potential and Actual Discharges** – A description of the Permittee’s procedures for assigning due dates for corrective actions. Each Permittee shall require timely correction of all potential and actual discharges. Permittees shall require actual discharges to cease immediately. Corrective actions shall be implemented before the next rain event, and no longer than 10 business days after the potential or actual non-stormwater discharges are discovered. Corrective actions can be temporary, in which case more time can be allowed for permanent corrective actions. If more than 10 business days are required for compliance, the rationale, including the expected time frame for compliance, shall be recorded in the electronic database or equivalent tabular system.
- (4) **Referral and Coordination with Other Agencies** – Each Permittee shall enforce its stormwater ordinances to achieve compliance at sites with observed potential and actual discharges, including compliance required by Discharge Prohibition A.1. For cases in which the Permittee’s enforcement tools are inadequate to remedy the noncompliance, the Permittee shall refer the case to the Water Board, district attorney, or other relevant agencies for additional enforcement. Permittees may also contact and coordinate with Water Board staff for joint inspections and parallel enforcement of large, complex, or noncompliant sites.

C.4.d. Inspections

i. Task Description – Each Permittee shall conduct inspections according to the Inspection Plan in Provision C.4.b.ii.(2) and the ERP in Provision C.4.c.ii. to enforce its ordinance to prevent stormwater pollution.

ii. Implementation Level

- (1) Inspections – Inspections shall be conducted to include at least the following activities:
 - (a) Observations for appropriate BMPs to prevent stormwater runoff pollution, or unauthorized or illicit discharge;
 - (b) Observations for evidence of unauthorized or illicit discharges, illicit connections, and potential discharge of pollutants to stormwater by the Discharger or contractors, such as and including mobile businesses, that operate on the facility;
 - (c) Observations for noncompliance with Permittee ordinances and other local requirements; and
 - (d) Verification of coverage under the Industrial General Permit, if applicable.
- (2) Record Keeping – Permittees shall maintain adequate records to demonstrate compliance and appropriate follow-up enforcement responses for facilities inspected. Permittees shall maintain an electronic database or equivalent tabular system that contains the following information regarding industrial and commercial site inspections:
 - (a) Name of facility/site inspected
 - (b) Inspection date
 - (c) Industrial General Permit coverage required (Yes or No)
 - (d) Compliance status
 - (e) Specific problems, including inadequate and ineffective BMPs
 - (f) Type of enforcement (if applicable)
 - (g) Problem resolution date
 - (h) Additional comments

The electronic database or equivalent tabular system and any supporting documentation shall be made readily available to Water Board staff or its representative during inspections, audits, or upon request.

- (3) Data Evaluation – Permittees shall evaluate the frequency of potential and actual non-stormwater discharges by business category. Note trends and, as needed, implement focused inspections or education in subsequent years to address trends.

iii. Reporting

- (1) Permittees shall include the following information in each Annual Report:
 - (a) Number of inspections conducted;
 - (b) Number of each type of enforcement action, as listed in each Permittee’s ERP, issued;
 - (c) Number of enforcement actions or discrete number of potential and actual discharges fully resolved within 10 working days or otherwise deemed resolved in a longer, but still timely manner; and
 - (d) Frequency of potential and actual non-stormwater discharges by business category.
- (2) Permittees shall make the list of facilities required to have coverage under the Industrial General Permit, but that have not filed for coverage, available upon Water Board request. For facilities added to the list or re-inspected during this Permit term, the list shall include the date when the facility was first identified and the date when it was most recently inspected or evaluated.

C.4.e. Staff Training

- i. **Task Description** – Permittees shall provide focused training for industrial and commercial site inspectors and illicit discharge detection and elimination inspectors annually. Trainings may be program-wide, region-wide, or Permittee- specific.
- ii. **Implementation Level** – At a minimum, provide inspection training, within the 5-year term of this Permit, in the following topics:
 - (1) Urban runoff pollution prevention;
 - (2) Inspection procedures;
 - (3) Business Inspection Plan;
 - (4) Enforcement Response Plan;
 - (5) Illicit Discharge Detection and Elimination; and
 - (6) Appropriate BMPs to be used at different industrial and commercial facilities.

iii. Reporting – The Permittees shall include the following information in each Annual Report:

- (1) Dates of training;
- (2) Training topics covered;
- (3) Total number ~~and percentage~~ of industrial and commercial site inspectors attending training; and
- (4) Total number and percentage of illicit discharge detection and elimination inspectors attending training.

C.13. Copper Controls

The Permittees shall implement the following control program for copper. The Permittees shall implement the control measures and accomplish the reporting on those control measures according to the provisions below. The purpose of these provisions is to implement the control measures identified in the Basin Plan amendment necessary to support the copper site-specific objectives in San Francisco Bay. The Permittees may comply with any requirement of Provision C.13 through a collaborative effort.

C.13.a. Manage Waste Generated from Cleaning and Treating of Copper Architectural Features, Including Copper Roofs, during Construction and Post-Construction.

i. **Task Description** – The Permittees shall prohibit the discharge of wastewater to storm drains generated from installing, cleaning, treating, or washing copper architectural features, including copper roofs.

ii. **Implementation Level**

- (1) The Permittees shall require, when issuing building permits, use of appropriate BMPs for managing copper-containing waste during and post-construction.
- (2) The Permittees shall educate installers and operators on appropriate BMPs for managing copper-containing wastes.
- (3) The Permittees shall enforce against noncompliance.

iii. **Reporting**

- (1) In the 20XX Annual Report, those Permittees shall confirm that legal authority exists to prohibit the discharge of wastewater to storm drains generated from the installation, cleaning, treating, and washing of copper architectural features, including copper roofs.
- (2) In the 20XX Annual Report, the Permittees shall report how copper architectural features are addressed through the issuance of building permits.
- (3) The Permittees shall report annually permitting and enforcement activities.

C.13.b. Manage Discharges from Pools, Spas, and Fountains that Contain Copper-Based Chemicals

i. **Task Description** – Permittees shall prohibit discharges to storm drains from pools, spas, and fountains that contain copper-based chemicals.

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ii. **Implementation Level** – The Permittees shall either: 1) require installation of a sanitary sewer discharge connection for pools, spas, and fountains, including connection for filter backwash, with a proper permit from the POTWs; or 2) require diversion of discharge for use in landscaping or irrigation.

iii. **Reporting**

- (1) In the 20XX Annual Report, the Permittees shall confirm that legal authority exists to prohibit the discharges to storm drains of water containing copper-based chemicals from pools, spas, and fountains.
- (2) In the 20XX Annual Report, the Permittees shall report how copper-containing discharges from pools, spas, and fountains are addressed to accomplish the prohibition of the discharge.
- (3) The Permittees shall report annually on any enforcement activities.

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C.13.c. **Industrial Sources**

i. **Task Description** – The Permittees shall ensure industrial facilities do not discharge elevated levels of copper to storm drains by ensuring, through industrial facility inspections, that proper BMPs are in place.

ii. **Implementation Level**

- (1) As part of industrial site controls required by Provision C.4, the Permittees shall identify facilities likely to use copper or have sources of copper (e.g., plating facilities, metal finishers, auto dismantlers) and include them in their inspection program plans.
- (2) The Permittees shall educate industrial inspectors on industrial facilities likely to use copper or have sources of copper and proper BMPs for them.
- (3) As part of the industrial inspection, inspectors shall ensure that proper BMPs are in place at such facilities to minimize discharge of copper to storm drains, including consideration of roof runoff that might accumulate copper deposits from ventilation systems on site.

iii. **Reporting**

The Permittees shall highlight copper reduction results in the industrial inspection component in the Provision C.13 portion of each Annual Report.