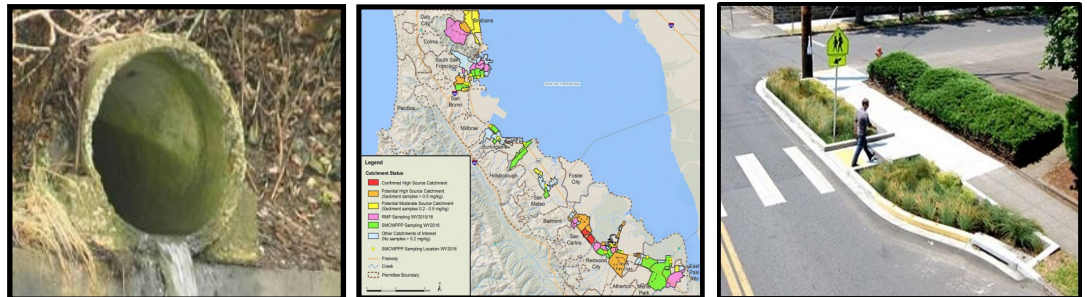


Mercury and PCBs Control Measures Report

Version 4.0

Submitted by the San Mateo Countywide Water Pollution Prevention Program on behalf of all MRP 3.0 (NPDES Permit No. CAS612008, Order No. R2-2022-0018) Permittees in San Mateo County, in compliance with Provisions C.11/12.a.iii(2)



September 30, 2026

CREDITS

This report is submitted by the participating agencies in the



Town of Atherton
City of Belmont
City of Brisbane
City of Burlingame
Town of Colma
City of Daly City
City of East Palo Alto

City of Foster City
City of Half Moon Bay
Town of Hillsborough
City of Menlo Park
City of Millbrae
City of Pacifica
Town of Portola Valley
City of Redwood City

City of San Bruno
City of San Carlos
City of San Mateo
City of South San Francisco
Town of Woodside
County of San Mateo
OneShoreline

Prepared for:

San Mateo Countywide Water Pollution Prevention Program (SMCWPPP)
555 County Center, Redwood City, CA 94063
A Program of the City/County Association of Governments (C/CAG)

Prepared by:

EOA, Inc.
3214 College Ave., Berkeley, CA 94705



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- B - Maps of Stormline Cleanouts, Green Infrastructure, and Other Stormwater Treatment Controls Built/Installed in San Mateo County through FY 2025/26
- C - Program for Management of PCBs during Building Demolition – Data Summary through FY 2025/26 for San Mateo County MRP Permittees

LIST OF ABBREVIATIONS

BAMSC	Bay Area Stormwater Collaborative
BASMAA	Bay Area Stormwater Management Agencies Association
BMP	Best Management Practice
CCR	California Code of Regulations
CWA	Clean Water Act
DSBB	Debris-Separating Baffle Box
FY	Fiscal Year
GI	Green Infrastructure
GIS	Geographic Information System
GSRD	Gross Solid Removal Device
HDS	Hydrodynamic Separator Unit
HHW	Household Hazardous Waste
LID	Low Impact Development
MPCP	Moderate PCBs-Contributing Property
MRP	Municipal Regional Permit
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollution Discharge Elimination System
O&M	Operation and Maintenance
OFEE	Oil-Filled Electrical Equipment
PCBs	Polychlorinated Biphenyls
PG&E	Pacific Gas and Electric
POC	Pollutant of Concern
POTW	Publicly Owned Treatment Works
PPM	Parts Per Million
RAA	Reasonable Assurance Analysis
ROW	Right-of-Way
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SOP	Standard Operating Procedure
TMDL	Total Maximum Daily Load
USEPA	United States Environmental Protection Agency
VSQG	Very Small Quantity Generator
Water Board	San Francisco Bay Regional Water Quality Control Board
WMA	Watershed Management Area

SECTION 1 -INTRODUCTION

REGULATORY BACKGROUND

Fish tissue monitoring in San Francisco Bay (Bay) has revealed the bioaccumulation of Polychlorinated Biphenyls (PCBs), mercury, and other pollutants in Bay sportfish. The levels found are thought to pose a health risk to people consuming these fish and as a result, an interim advisory has been issued on the consumption of sportfish from the Bay. The advisory led to the Bay being designated as an impaired water body on the Clean Water Act (CWA) "Section 303(d) list" due to elevated levels of PCBs and mercury. In response, the San Francisco Bay Regional Water Quality Control Board (Water Board) has developed Total Maximum Daily Load (TMDL) water quality restoration programs targeting PCBs and mercury in the Bay. The general goals of the TMDLs are to identify sources of PCBs and mercury to the Bay, implement actions to control the sources, and restore water quality.

The PCBs and mercury TMDLs indicate that reductions in PCBs and mercury from urban stormwater runoff to the Bay are needed to achieve water quality standards and restore beneficial uses. Provisions C.11 and C.12 of the Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit no. CAS612008 (MRP 3.0; Order R2-2022-0018) implement the urban runoff requirements of the mercury and PCBs TMDLs. These provisions require Permittees to plan, implement and report on control programs during the permit term to reduce the urban runoff loads of these pollutants.

PURPOSE OF CONTROL MEASURES REPORT

This *Mercury and PCBs Control Measures Report* was developed to comply with the reporting requirements identified in Provisions C.11 and C.12. Each year of the permit, Permittees are required to track and report on the implementation of the control programs described in Provisions C.11.b through C.11.e and C.12.b through C.12.g. The associated mercury and PCBs load reductions reduced or avoided due to implementation of these control programs must be reported in the fourth year of the permit (2026). Loads avoided/reduced will be assessed following the methodologies developed during the previous permit term and submitted with *Pollutant Control Measure Implementation Plan and Reasonable Assurance Analysis* (RAA Plan) that was developed during MRP 2.0 and submitted to the Water Board in September 2020. The RAA Plan included methodologies to account for load reductions for source controls, as described in the *Source Control Load Reduction Accounting for Reasonable Assurance Analysis* (BASMAA 2022). The RAA Plan also presented a model that was used to evaluate loads reduced for green infrastructure implementation across San Mateo County. The RAA Plan was updated and resubmitted to the Water Board in March 2026.

This Report (Version 4.0) is the fourth version of this report submitted under MRP 3.0. This report documents the control measure programs that were implemented in San Mateo County during the permit term to date (i.e., through Fiscal Year (FY) 2025/26). This report will be updated each subsequent year of the permit to provide new or revised information on control measure program implementation as required.

APPROACH TO CONTROL MEASURE IMPLEMENTATION AND TRACKING

MRP 3.0 provides a renewed focus on implementing mercury and PCBs control measures in old industrial land use areas and/or areas that have moderate to high mercury or PCBs. Old industrial land use areas are defined as parcels that were industrialized prior to 1980, and that continued to have industrial activities through at least 2002 (i.e., the approximate start of the PCBs TMDL). Because PCBs were more heavily used in older industrial areas, these areas are believed to contribute much higher masses of PCBs per unit area than newer urban land use areas. The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) has identified and mapped all old industrial land use parcels as of 2002 within San Mateo County. As these parcels are redeveloped into new urban land use, or other control measures applied, the masses of mercury and PCBs contributed by these areas are expected to substantially reduce. Therefore, the majority of control measure planning and implementation is focused on catchments containing old industrial parcels.

Stormwater catchments were chosen as the primary geographical scale at which planning, implementation and tracking of control measures is conducted. Catchment areas are based on SMCWPPP's current understanding of stormwater hydrology in the County. In San Mateo County, catchments where control measures are planned and implemented are identified as Watershed Management Areas (WMAs). All mercury and PCBs control measures that are implemented across San Mateo County are tracked and reported for each SMCWPPP Permittee by WMA.

During MRP 2.0, SMCWPPP Permittees developed a web-based system for tracking and mapping Green Infrastructure (GI) and other stormwater treatment implementation in San Mateo County. This system is called the San Mateo County GI Tracking Tool (Tool). During MRP 3.0, SMCWPPP Permittees will continue to track control measure implementation in the Tool. The Tool is [available via the Countywide Program's website \(https://www.flowstobay.org/data-resources/plans/sustainable-streets-master-plan/#green-infrastructure-tracking-tool\)](https://www.flowstobay.org/data-resources/plans/sustainable-streets-master-plan/#green-infrastructure-tracking-tool). The Tool allows for tracking all scales of GI implementation (regional, street, and parcel), and provides the tracking needed to demonstrate that wasteload allocations for TMDLs are being met.

This Report provides data on existing PCBs and mercury control measures implemented during MRP 3.0 to date based on the information currently incorporated into the San Mateo County GI Tracking Tool, as well as information gathered from SMCWPPP Permittees on other types of control measures.

ROLES AND RESPONSIBILITIES FOR CONTROL MEASURE IMPLEMENTATION

SMCWPPP Permittees are responsible for the implementation of PCBs and mercury control measures, or causing control measures to be implemented by other parties. Depending on the size and complexity of the public agency and the type of control measure, implementation can occur via an array of Permittee departments and divisions.

SMCWPPP (the Program) provides assistance to SMCWPPP Permittees by developing guidance on control measure implementation, assisting with the identification and prioritization of control measure types and locations, conducting investigations and monitoring to identify areas with elevated mercury or PCBs, and tracking, monitoring and reporting on control measures and the resulting load reduction benefits. SMCWPPP does not directly implement PCBs and mercury control measures.

Similar to SMCWPPP, the former BASMAA (and now the Bay Area Municipal Stormwater Collaborative, or BAMSC) did not directly implement control measures. BASMAA conducted projects of regional benefit that developed guidance and tools to assist Permittees with control measures implementation. Regional projects have typically been conducted to reduce costs and/or to develop regional consistency. BAMSC continues to conduct projects of regional benefit to support Permittees implementation of control measures and other MRP requirements.

ORGANIZATION OF THE REPORT

The remainder of this report is organized as follows:

- Section 2 – Source Property Identification and Abatement
- Section 3 – Controls in Old Industrial Areas
- Section 4 – Green Infrastructure (GI) and Other Stormwater Treatment Controls
- Section 5 – Controlling PCBs from Bridges and Overpasses
- Section 6 – Controlling PCBs from Electrical Utilities
- Section 7 – Managing PCBs-Containing Materials and Wastes During Building Demolition
- Section 8 – Mercury Collection and Recycling
- Section 9 – Mercury and PCBs Loads Reduced

Section 2 through Section 8 each describe the applicable control measure program, document continuation of actions completed during MRP 2.0 for which load reduction credit was received (if any), and document the actions completed during MRP 3.0 to date (i.e., through FY 2025/26) and provide estimates for actions anticipated by the end of the permit term (FY 2026/27) by providing all supporting data required to calculate the mercury and PCBs loads reduced. Within each control measure section, any controls implemented in old industrial land use areas and other areas where elevated mercury or PCBs concentrations have been documented, are also highlighted. Section 9 describes the accounting methods that are used in this report to calculate mercury and PCBs loads reduced for all control measures implemented during MRP 3.0 and described in the report (i.e. through the end of FY 2026/27).

The information provided includes all information on control measures compiled by SMCWPPP to date and may not include all existing or planned control measures. The inventory of control measures implemented or caused to be implemented by SMCWPPP Permittees will continue to be updated and refined as additional information becomes available and as new or enhanced actions are implemented.

SECTION 2 - SOURCE PROPERTY INVESTIGATION AND ABATEMENT

This section describes the Source Area Investigation process and the abatement and control programs that apply to confirmed high and moderate sources of PCBs or mercury to the MS4. This section documents continuation of actions completed during MRP 2.0 for which load reductions credit was received, and provides documentation of the actions completed during MRP 3.0 to date (i.e., through FY 2025/26), and anticipated during FY 2026/27, including all supporting data required to calculate any mercury and PCBs loads reduced.

CONTROL MEASURE DESCRIPTION

PCBs and mercury source properties are those that disproportionately contribute elevated pollutants to MS4s. PCBs are considered elevated if concentrations¹ in sediment are ≥ 0.2 mg/kg, if stormwater particle ratios are ≥ 0.2 mg/kg, or if stormwater concentrations are ≥ 36 ng/L (i.e., the top 15% of concentrations measured in stormwater across the Bay Area). Mercury is considered elevated if the concentration in sediment (or the stormwater particle ratio) is ≥ 0.3 mg/kg. Land areas that contribute elevated PCBs (or mercury) to the MS4 require control measures to reduce or abate the sources. Identification and subsequent abatement of these properties and/or focused control measure implementation on properties to reduce pollutant release and/or controls in the public right-of-way (ROW) in source areas to remove historically deposited pollutants can provide an opportunity for meaningful PCBs and mercury stormwater load reductions. Reductions occur through the abatement of properties via referrals to the Water Board or through Permittees working with property owners.

SMCWPPP Permittees have identified and referred high PCBs and mercury source properties to the Water Board in the recent past. PCBs and mercury are considered high if PCBs concentrations in sediment are ≥ 1 mg/kg. New to MRP 3, Permittees have also started to identify and abate moderately-elevated PCBs and mercury properties. PCBs are considered moderate if concentrations in sediment are ≥ 0.2 mg/kg and <1 mg/kg. Mercury is considered moderate if concentrations in sediment are ≥ 0.3 mg/kg and <1 mg/kg. Source investigations are typically conducted in older industrial land areas or in other areas where mercury or PCBs were historically used, disposed of, or released. SMCWPPP's source investigation efforts during MRP 3.0 are primarily focused on old industrial land use areas that have not already been investigated, and that have not already been addressed via GI/low impact development (LID), or source property abatement. At a minimum, Permittees are required to investigate 1,411 acres of old industrial land use areas by the end of the permit term.

SOURCE PROPERTY INVESTIGATION PROCESS

Source investigations use research and monitoring data to identify land areas or parcels that are contributing elevated levels of PCBs (or mercury) to the MS4. SMCWPPP has developed a multi-phased investigation approach that starts with screening-level monitoring at the catchment or sub-catchment scale and moves to more site-specific monitoring at the parcel scale. Investigations of the unaddressed old

¹ PCBs, with regards to source property identification and abatement, refers to the total sum of the RMP 40 PCBs congeners. The RMP 40 PCB congeners include: PCB-8, PCB-18, PCB-28, PCB-31, PCB-33, PCB-44, PCB-49, PCB-52, PCB-56, PCB-60, PCB-66, PCB-70, PCB-74, PCB-87, PCB-95, PCB-97, PCB-99, PCB-101, PCB-105, PCB-110, PCB-118, PCB-128, PCB-132, PCB-138, PCB-141, PCB-149, PCB-151, PCB-153, PCB-156, PCB-158, PCB-170, PCB-174, PCB-177, PCB-180, PCB-183, PCB-187, PCB-194, PCB-195, PCB-201, PCB-203.

industrial land use areas in San Mateo County typically proceed through the investigation process until an old industrial parcel can be grouped into one of the following three categories:

- **High PCBs or Mercury Source Properties** – Parcels associated with high PCBs or mercury (≥ 1.0 mg/kg), typically identified through onsite sampling. These parcels are prioritized for abatement actions to reduce/prevent the release of high PCBs or mercury to the MS4.
- **Moderate Pollutant-Contributing Properties (MPCPs)** – Parcels associated with moderate PCBs (≥ 0.2 and < 1.0 mg/kg) or moderate mercury (≥ 0.3 and < 1.0 mg/kg), typically identified through onsite sampling. These parcels are prioritized for onsite control measures under the direction of the municipalities to reduce/prevent the release of moderate PCBs or mercury to the MS4.
- **Low PCBs-Contributing Properties** — Parcels associated with low PCBs (< 0.2 mg/kg). These areas are considered unlikely to contribute elevated PCBs to the MS4, and no PCBs control measures are required at this time.

The three investigation phases (tasks) that are followed to categorize each old industrial parcel are summarized below. This process is described in more detail in SMCWPPP (2024b).

Task 1: Screening-Level Investigation. The purpose of this task is to identify catchments or sub-catchments that have elevated PCBs or mercury in stormwater. These areas require further investigation (Task 2 and/or Task 3), to identify the source(s) of these pollutants in the catchment. This task involves collecting screening-level stormwater samples in locations that drain entire catchments or sub-catchments containing old industrial land use parcels. Samples are collected in the MS4, typically at outfalls (if possible) or further upstream in areas that drain a defined sub-catchment. If any screening-level samples have elevated PCBs or mercury, that catchment area is prioritized for more targeted investigation (Task 2). If stormwater sampling of a given catchment is not feasible, then the investigation of that catchment starts with Task 2.

Task 2: Targeted Public ROW Investigation. The purpose of this task is to use sediment samples to investigate the parcels within catchments/sub-catchments where elevated stormwater samples were found, or where stormwater sampling was not feasible. This task is focused on gathering information in the public ROW to determine if adjacent properties are potential sources of PCBs to the MS4 and require on-site investigation. Samples collected during this step will target smaller drainages and/or specific properties. Sediment samples are collected in locations within the public ROW that represents drainage or sediment release from one or more specific old industrial properties. If any public ROW samples have elevated PCBs (≥ 0.2 mg/kg) or mercury (≥ 0.3 mg/kg), the old industrial parcels draining or contributing sediment to that location are prioritized for on-site investigation (Task 3). There may be catchments that had elevated stormwater (Task 1), but subsequent public ROW sampling of old industrial properties does not point to any specific property(ies). In some cases, there may not be appropriate or accessible sampling locations within the public ROW that represent drainage from a given old industrial property. The Program will work with the appropriate municipality to determine next steps in those cases, which may include additional public ROW sampling or on-site investigation (Task 3).

Task 3: On-Site Property Inspections and Sampling. The purpose of this task is to conduct on-site investigation of specific properties to determine if the property is a source of elevated PCBs (or mercury) to the MS4. This task coordinates access to properties through a municipality's existing stormwater inspection programs. The on-site investigation will gather information about the property, including locations of on-site storm drain infrastructure that is directly connected to the MS4 and/or locations of potential sediment release from the property to public ROWs. Sediment samples will be collected from these locations with the consent and cooperation of property/business owners. If on-site samples have elevated PCBs (≥ 0.2 mg/kg)

or mercury (≥ 0.3 mg/kg), the property is confirmed as a source of moderate or high PCBs or mercury to the MS4.

In addition to the investigations conducted via monitoring as described above, the Program also conducts desktop evaluations of existing information and data from third parties to identify both past and present PCBs cleanup sites or other locations with high PCBs measured in soils on these properties. The data sources reviewed include historical maps and records referring to business activities or land uses (i.e. Sanborn Insurance maps; business lists such as White Pages; and newspaper or media excerpts) and credible data on third-party Environmental Site Assessments and related pollutant investigation and/or remediation or abatement efforts (e.g. data from the USEPA, CA DTSC (EnviroStor), and State Water Resources Control Board (Geotracker)). Properties with sufficient data identifying them as a source of PCBs (or mercury) are categorized as highly likely source properties, which may be submitted to the Water Board for further investigation and abatement, or may be submitted to the Water Board as a “self-abated” property that was a PCBs source in the past but has been fully remediated.

Information collected during source investigations and desktop evaluations regarding pollutant concentrations observed, evidence of transport to the MS4, previous stormwater violations, and other pertinent information is used to confirm a high PCBs or mercury source property or Moderate Pollutant-Contributing Property (MPCP). Both High Source Properties and MPCPs require follow-up actions to prevent the release of PCBs or mercury from these properties.

The next steps for confirmed High Source Properties include one of the following:

1. Submit a referral to the Water Board (or other regulatory agency) for follow-up investigation and abatement. Referrals must include a plan for enhanced operation and maintenance (O&M) in the public ROW adjacent to or downstream of the source property that the City will implement or cause to be implemented until the time the property is deemed abated.
2. Abate or cause the property to be abated directly, without referral to a regulatory agency. For this option, the City will work directly with the property owner to ensure the property is fully abated.

The next steps for MPCPs will entail Permittees working directly with the property owner to require implementation of appropriate controls on the property to reduce/prevent the release of moderate PCBs or mercury from the property to the MS4. Abatement of MPCPs is discussed further in Section 3 (Controls in Old Industrial Areas).

CONTROL MEASURE IMPLEMENTATION

CONTINUATION OF MRP 2.0 ACTIONS FOR LOAD REDUCTION CREDIT

During MRP 2.0, SMCWPPP Permittees submitted two high PCBs source property referrals for four properties to the Water Board for follow-up investigation and abatement (Table 2.1). SMCWPPP Permittees received 20 g/yr of PCBs load reduction credit and 5 g/yr of mercury load reduction credit during MRP 2.0 for these referrals. This credit represents 50% of the total load reduction available for abatement of the source properties, and has been contingent on continued implementation of O&M measures or other treatment controls in the vicinity of each referred source property. Although to date, none of these referred properties have been fully abated, ongoing controls have continued in the vicinity of these properties following submittal of the referrals to reduce release of PCBs from these properties and remove historically deposited PCBs in the public ROW. A description of these planned and ongoing activities is provided in Table 2.1. These activities will continue until the properties have been fully abated.

Table 2.1. List of PCBs source properties in San Mateo County that were referred to the Water Board during MRP 2.0 for follow-up investigation and abatement.

City	Location/APN	Area (Acres)	Referral Date	O&M Description
San Carlos	977 and 1007/1011 Bransten Road	2.2	FY 18-19	Installation and maintenance of seven curb extensions with bioretention facilities along Bransten Road on both sides of the street, including four facilities on the same side of the street and adjacent to the 977 and 1007/1011 Bransten Road properties and one facility just downstream. The bioretention areas, some of which were built with underdrains, were designed to remove pollutants from stormwater runoff flowing through the public ROW, including particle-bound pollutants such as PCBs (the underdrains are currently sealed off from the MS4).
San Carlos	270 Industrial Road and 495 Bragato Road	7.7	FY 18-19	Installation and maintenance of temporary sediment barriers at the edge of the property during redevelopment activities; planning for storm drain line cleanout by the property owners is currently underway with support from Water Board and SMCWPPP.

SOURCE INVESTIGATIONS CONDUCTED DURING MRP 3.0 TO DATE

Table 2.2 presents the data on acres of old industrial parcels that have been investigated through stormwater, sediment sampling, and/or desktop evaluations during MRP 3.0 to date (i.e., FY 2022/23 through FY 2025/26) and the current outcomes of these investigations. All of the source investigations conducted during MRP 3.0 to date have focused on old industrial land use areas. Note, investigations are considered complete if an old industrial property is identified as a high PCBs or mercury source property, an MPCP, or if the property is associated with low PCBs (i.e., an unlikely source property). Of the 3,049 acres of old industrial parcels that required investigations at the start of MRP 3.0², SMCWPPP has started or continued investigations of **2,196 acres** of old industrial parcels. Of these, investigations are complete on **1,769 acres**, including **261 acres** identified as high PCBs source properties, **21 acres** identified as MPCPs, and **1,485 acres** associated with low PCBs. This information demonstrates that Permittees have completed well above the required 1,411 acres that must be investigated during MRP 3.0. Investigations are continuing on another **427 acres** that are associated with elevated PCBs in the public ROW but where the source properties have not yet been identified. The remaining **306 acres** currently under investigation have been sampled but the results are not yet available. There are also **550 acres** of old industrial parcels that have not yet been investigated. The Program expects to conduct screening (stormwater or sediment sampling, or desktop review) of these **550 acres** by the end of the permit term. In addition, there are also **303 acres** of old industrial areas that are associated with moderate or high PCBs concentrations in the public ROW based on sampling conducted during MRP 2.0, but the sources have not yet been found. Follow-up investigation of these and all other parcels associated with elevated PCBs will continue through the permit term.

² This number does not include the following acreages: Old industrial parcels that were redeveloped during MRP 2.0 (594 acres) or MRP 3.0 (213 acres); old industrial parcels that were investigated during MRP 2.0 and found to be associated with low PCBs (1,304 acres); or old industrial properties that were referred to the Water Board during MRP 2.0 as high PCBs source properties.

Table 2.2 Acres of old industrial parcels investigated and current outcomes in San Mateo County, CA during MRP 3.0 to date (i.e., FYs 2022/23 through 2025/26).^{a, b, c, d, e}

Permittee	WMA	Investigation Type												Total Acres
		Desktop Screening and Review of Third Party Data		On-site Sediment			Public ROW Sediment				Stormwater Screening			
		High Likelihood Source Property	Low Likelihood Source Property	High PCBs	Moderate PCBs	Low PCBs	High PCBs	Moderate PCBs	Low PCBs	Results Pending	High PCBs	Low PCBs	Results Pending	
Belmont	77	--	--	--	--	--	--	--	3.7	--	4.4	--	--	8.1
	101	--	--	--	--	--	--	--	6.7	--	--	--	--	6.7
Brisbane	17	--	--	1.4	0.8	4.1	--	--	5.7	--	--	--	--	12
	1004	--	--	--	--	23	--	--	293	--	--	--	--	317
	1004B	39	--	--	--	--	--	--	--	--	--	--	--	39
Burlingame	85	--	--	--	--	--	--	--	27	8.6	1.2	--	--	37
	139	--	--	--	--	--	--	--	1.2	--	--	--	--	1.2
	141	--	--	--	--	--	--	2.2	--	--	--	--	--	2.2
	142	--	--	--	--	--	--	0.1	2.2	0.9	--	--	--	3.2
	164	--	--	--	--	--	--	--	69	10	--	--	--	79
	1006	--	--	--	--	--	--	--	31	21	--	--	--	52
	1006A	--	--	--	--	--	--	--	--	1.8	--	--	--	1.8
	Other - BUR	--	--	--	--	--	--	--	--	7.4	--	--	--	7.4
Colma	329	--	--	--	--	--	--	--	--	3.8	--	--	--	3.8
	Other - COL	--	--	--	--	--	--	--	--	5.0	--	--	--	5.0
Daly City	307	--	--	--	--	--	--	--	--	2.3	--	--	--	2.3
	1004B	--	--	--	--	--	--	--	--	2.4	--	--	--	2.4
	Other - DCY	--	--	--	--	--	--	--	--	9.2	--	--	--	9.2
East Palo Alto	67	--	--	--	--	--	--	2.8	6.4	--	--	--	--	9.3
	68	--	--	--	--	--	--	--	1.4	--	--	--	--	1.4
	70	--	--	--	--	--	--	--	--	6.9	--	--	--	6.9
	72	--	--	--	--	--	--	--	0.03	0.5	--	--	--	0.5
	1015	13	--	--	--	--	--	--	7.2	--	--	--	--	20
Menlo Park	66	--	--	--	--	--	--	--	32	--	--	--	--	32
	71	--	--	--	--	--	--	--	21	--	--	--	--	21
	238	58	--	--	--	--	--	--	--	5.5	--	--	--	64
	239	--	--	--	--	--	--	--	8.4	--	--	--	--	8.4
	332	--	--	--	--	--	--	--	4.6	--	--	--	--	4.6
	1012	29	--	--	--	--	--	--	--	--	--	--	--	29
Millbrae	395	--	--	--	--	--	--	--	8.2	--	--	--	--	8.2
	401	--	--	--	--	--	--	--	--	15	--	--	--	15
	1005	--	--	--	--	--	--	--	--	5.0	--	18	--	23
	Other - MIL	--	--	--	--	--	--	--	1.5	--	--	--	--	1.5

Permittee	WMA	Investigation Type												Total Acres
		Desktop Screening and Review of Third Party Data		On-site Sediment			Public ROW Sediment				Stormwater Screening			
		High Likelihood Source Property	Low Likelihood Source Property	High PCBs	Moderate PCBs	Low PCBs	High PCBs	Moderate PCBs	Low PCBs	Results Pending	High PCBs	Low PCBs	Results Pending	
Redwood City	239	--	--	--	--	--	--	--	4.2	2.2	--	--	--	6.4
	253	--	--	--	--	--	--	--	--	0.2	--	--	--	0.2
	261	--	--	--	--	--	3.4	--	--	1.0	--	--	--	4.4
	267	--	--	--	--	--	--	--	2.1	--	--	--	--	2.1
	269	--	--	--	--	--	3.3	--	--	--	--	--	--	3.3
	325	--	--	--	--	--	--	--	--	1.7	--	--	--	1.7
	334	--	--	--	--	--	9.2	--	--	--	--	--	--	9.2
	335	--	--	--	--	--	--	--	18	--	--	--	--	18
	336	--	--	--	--	--	--	--	6.9	--	--	--	--	6.9
	379	3.5	--	--	--	--	3.4	--	--	--	--	--	--	6.8
	407	--	--	--	--	--	--	--	5.9	--	--	--	--	5.9
	1000	2.4	--	--	--	--	60	--	28	--	--	--	--	90
	Other - RCY	--	--	--	--	--	--	--	--	0.05	--	--	--	0.05
San Bruno	290	--	--	--	--	--	2.1	--	14	--	4.5	--	--	21
	292	--	--	--	--	--	--	--	--	13	--	--	--	13
	1005	--	--	--	--	--	--	--	--	--	--	23	--	23
San Carlos	59	--	--	--	--	--	--	--	3.6	--	--	--	--	3.6
	75	--	--	--	--	--	--	--	16	--	--	--	--	16
	210	4.8	--	--	--	--	--	--	--	--	--	--	--	4.8
	1011	--	--	--	18	--	--	--	--	--	--	--	--	18
	1016	--	--	--	--	--	--	--	2.2	--	--	77	--	80
	1011C	--	--	--	--	--	--	--	1.3	--	--	--	--	1.3
	1011D	--	--	--	--	--	--	--	7.2	--	--	--	--	7.2
San Mateo	111	--	--	--	--	--	0.6	--	--	--	--	--	--	0.6
	114	--	--	--	--	--	3.8	--	1.4	--	--	--	--	5.1
	399	--	--	--	--	--	1.3	--	--	--	--	--	--	1.3
	1009	--	--	--	--	--	--	--	27	--	--	--	29	57
	1017	--	--	--	--	--	--	--	15	--	--	--	--	15
	Other - SMO	--	--	--	--	--	--	--	55	--	--	--	--	55

Permittee	WMA	Investigation Type												Total Acres
		Desktop Screening and Review of Third Party Data		On-site Sediment			Public ROW Sediment				Stormwater Screening			
		High Likelihood Source Property	Low Likelihood Source Property	High PCBs	Moderate PCBs	Low PCBs	High PCBs	Moderate PCBs	Low PCBs	Results Pending	High PCBs	Low PCBs	Results Pending	
South San Francisco	291	--	--	--	--	22	--	0.9	62	5.3	--	--	--	90
	293	--	--	--	--	--	--	--	1.0	--	--	37	--	38
	294	2.1	--	--	2.1	25	6.4	0.8	24	--	--	--	--	60
	295	--	--	--	--	--	--	--	--	13	--	--	--	13
	297	--	--	--	--	--	--	--	--	1.0	--	--	--	1.0
	298	--	--	--	--	--	--	--	--	11	--	--	--	11
	314	--	--	--	--	20	--	--	19	--	--	--	--	38
	315	--	--	--	--	--	--	--	46	--	--	--	--	46
	316	--	--	--	--	0.7	--	--	--	--	--	--	--	0.7
	317	--	--	--	--	--	--	--	--	29	--	--	--	29
	319	--	--	--	--	--	--	--	--	1.3	--	--	--	1.3
	356	--	--	--	--	--	--	--	0.6	--	--	--	--	0.6
	358	--	--	--	--	--	--	--	16	--	--	--	--	16
	359	--	--	--	--	--	--	--	--	1.6	--	--	--	1.6
	362	--	--	--	--	4.3	--	--	--	--	--	--	--	4.3
	1001	--	--	--	--	1.4	--	--	4.9	35	--	--	--	41
	1002	--	--	--	--	17	--	--	--	11	--	34	--	61
	1001B	--	--	--	--	--	--	--	4.9	--	--	--	--	4.9
	1001C	--	--	--	--	2.5	--	--	--	10	--	--	--	13
	1001D	--	--	--	--	--	--	--	0.7	27	--	--	--	28
	Other - SSF	--	--	--	--	--	--	--	--	9.2	--	--	--	9.2
Unincorporated San Mateo County	77	--	--	--	--	--	--	--	12	--	10	--	--	23
	1005	--	--	--	--	--	--	--	--	--	--	1.4	--	1.4
	1011	--	--	--	--	--	--	--	1.6	--	--	--	--	1.6
	Other - SMC	109	244	--	--	--	--	--	--	--	--	--	--	353
Total Investigated in MRP 3.0		261	244	1	21	119	93	6.9	931	277	21	191	29	2,196
Total Completed Investigations in MRP 3.0		261	244	1	21	119	--	--	931	--	--	191	--	1,769

^a Investigation of old industrial parcels with low PCBs (< 0.2 mg/kg) are considered complete. No additional investigation is planned during MRP 3.0.

^b Old industrial parcels associated with elevated PCBs (≥ 0.2 mg/kg) during screening sampling will require additional investigation to identify the specific source(s).

^c Source investigations that find moderate PCBs on-site at a property are considered complete. Next steps include abatement of the property.

^d Source property referrals are considered complete. No additional investigation is required during MRP 3.0.

^e The PCBs and mercury concentration data for sediment and stormwater samples collected during MRP 3.0 as part of these source investigations is reported each Water Year in the Program’s Urban Creeks Monitoring Reports (SMCWPPP 2023, 2024a, 2025) and in the Program’s Integrated Monitoring Report (IMR) that will be submitted to the Water Board in March 2026.

^f WMA = Watershed Management Area.

HIGH PCBs AND MERCURY SOURCE PROPERTY REFERRALS

During MRP 3.0 to date, SMCWPPP Permittees have not submitted any source property referrals to the Water Board.

However, Permittees have identified eight PCBs source properties (See Table 3 and **Attachment A**) and are working with the Countywide Program on next steps. Three of these properties are also sources of elevated mercury to the MS4, two with moderately elevated mercury concentrations and one with highly elevated mercury concentrations. Referrals to the Regional Water Board for follow-up investigation and abatement, and initiation by the Permittees of O&M in the MS4, are anticipated for most or all of the identified properties during MRP 3.0. For these combined eight PCBs source property referrals (totaling **53.2 acres**) and three mercury source property referrals (totaling **44.9 acres**) Permittees will receive load reduction credits of **134 g/yr PCBs and 1.8 g/yr mercury** during MRP 3.0. This credit represents 50% of the total load reduction available for abatement of the source properties, contingent upon implementation of O&M measures in the vicinity of each referred source property. Permittees will receive the complete load reduction credit when each given source property has completed abatement or after ten years, whichever comes first. The O&M actions for the source properties will be presented to Water Board staff for approval prior to submittal of the referrals. Additional source property referrals are anticipated as desktop and sample data is analyzed; suspected source properties are confirmed; and source investigations accelerate throughout the remainder of the MRP 3.0 permit term.

PCBs and mercury load reductions are detailed in Section 9. Additional source property referrals may be submitted during FY 2026/27 pending outcomes of ongoing investigations.

Table 2.3. High PCBs and mercury source property referrals to the Regional Water Board anticipated during MRP 3.0.

Permittee	WMA	Location/APN	Submittal Date	Area (Acres)	PCBs Load Reduction Credit (g/yr)		Mercury Load Reduction Credit (g/yr)	
					During MRP 3.0	After Abatement	During MRP 3.0	After Abatement
San Carlos	210	1409 & 1411 Industrial Road APN 046211210	Anticipated FY 26-27	1.28	3.2	6.5	--	--
		Washington/Varian Street Properties APN 046203080 046203090 046203190 046203230 046221150 046203240 046203250 046203999 046221080 046221100 046221110 046221180 046221200 046221210 046221220 046221230	Anticipated FY 26-27	3.52	8.9	17.7	0.09	0.2
Redwood City	379	2111 Bay Road APN 054022150	Anticipated FY 26-27	2.72	6.8	13.7	--	--
		Bay Road to Charter Street APN 054022160 054022170 054022200 054022200	Anticipated FY 26-27	0.74	1.9	3.7	--	--
	Other - RCY	505 E Bayshore APN 052520010	Anticipated FY 26-27	2.45	6.2	12.3	0.7	1.5
South San Francisco	294	166 Harbor Way APN 015032040	Anticipated FY 26-27	2.12	5.3	10.7	--	--
Brisbane	17	280 Valley Drive APN 005180090	Anticipated FY 26-27	1.45	3.6	7.3	--	--
	1004B	Bayshore Boulevard (UPC-OU-SM) APN 005340998 005340060 005340100	Anticipated FY 26-27	38.9	97.8	196	1.0	1.9
Totals				53.2	134	267	1.8	3.5

SECTION 3 -CONTROLS IN OLD INDUSTRIAL AREAS

This section describes the Program for Controls in Old Industrial (OI) Areas and provides documentation of the targeted actions completed during MRP 3.0 to date (i.e., through FY 2025/26), and anticipated during FY 2026/27, including all supporting data required to calculate any mercury and PCBs loads reduced.

CONTROL MEASURE DESCRIPTION

Monitoring conducted across the MRP area over the past 20+ years has found that PCBs and mercury in sediment and stormwater, on average, are higher in OI land use areas compared with other types of land uses. Because control measure implementation in areas with elevated PCBs or mercury will provide the most load reduction benefits, this control program is focused on implementing controls in OI land use areas or other areas where PCBs or mercury are elevated. There are a variety of controls that can be implemented in old industrial areas, including both targeted controls and other types of control measures. Additional details on these types of controls are provided below. At a minimum, Permittees are required to implement controls in OI land uses that provide 81 g/yr of PCBs load reduction and 19 g/yr of mercury load reduction by the end of the permit term.

TARGETED CONTROLS

Targeted control programs are directed by Permittees and include ongoing, enhanced, and new actions that target OI land areas and other areas containing known or suspected PCBs or mercury source areas or evidence of moderately to highly elevated concentrations based on monitoring data. Targeted control programs include the following:

1. **Abatement of Highly Elevated PCBs Source Properties.** This control program is a continuation of ongoing efforts since MRP 1.0 to target properties that are sources of highly elevated PCBs for referral and abatement. This control program, the associated investigation process to identify highly elevated source properties, and the level of implementation during MRP 3.0 is presented in Section 2.
2. **Controls for Properties with Moderately Elevated PCBs or Mercury.** This control program is a new effort developed during MRP 3.0 that targets Moderate Pollutant (PCBs or mercury) Contributing Properties (MPCPs) for on-site controls. MPCPs are identified through the investigation process described in Section 2.
3. **Controls for Public ROW Areas in Catchments with Elevated PCBs or Mercury.** This control program focuses on catchments with moderately to highly elevated PCBs or mercury found in the public ROW that require actions to remove PCBs- or mercury-laden sediments from the storm drain system (i.e., Operations and Maintenance activities) or other types of controls (i.e., downstream stormwater treatment). The locations in the public ROW with elevated PCBs or mercury are identified through the investigation process described in Section 2.

OTHER CONTROLS

Other (non-targeted) control measures include actions that are implemented by Permittees, other agencies, or by private parties associated with OI land use areas, but do not specifically target areas with known moderately to highly elevated PCBs or mercury in the catchment. Although these controls are not implemented for PCBs or mercury load reduction purposes, they may still provide opportunistic PCBs and

mercury load reduction benefits when implemented in OI land areas and other areas with elevated PCBs or mercury. Other control measure programs include:

1. **Green Infrastructure (GI).** Includes parcel-based LID implemented on properties and public sustainable streets and regional stormwater capture projects.
2. **Other Stormwater Treatment.** Includes a variety of stormwater treatment systems that may entail propriety devices that remove sediment, trash, and other pollutants from stormwater through screening, trapping, filtering, and settling mechanisms. These systems are most commonly installed for purposes other than PCBs/mercury, such as for trash controls, but can still provide PCBs and mercury load reduction benefits. Examples include High-Flow Capacity Stormwater Treatment Systems and Inlet-based Stormwater Screening Devices.

CONTROL MEASURE IMPLEMENTATION

CONTROLS FOR PROPERTIES WITH MODERATELY ELEVATED PCBs OR MERCURY

During MRP 3.0 to date, Permittees have identified three MPCPs for PCBs (none are also sources of mercury). These MPCPs and the status of abatement efforts are described in Table 3.1. These MPCPs comprise approximately **21 acres** of OI land uses, and are located in the Cities of Brisbane, San Carlos, and South San Francisco (See **Attachment A**). On-site controls have not yet been implemented on these three MPCPs, but Permittees anticipate that all three properties will have on-site controls in place by the end of the permit term. On-site MPCP controls for these three properties will provide approximately **5.5 g/yr of PCBs** load reductions. The Program estimates that approximately **40 additional acres of MPCPs** will be identified and controlled by the end of the permit term, providing an **additional 10 g/yr of PCBs** load reductions and **1 g/yr of mercury** load reductions.

Table 3.1. Moderate Pollutant Contributing Properties identified during MRP 3.0.

Permittee	WMA	Location/APN	Date Identified (FY)	Status	Next Steps	Area (Acres)	Anticipated Load Reduction Credit (g/yr)	
							PCBs	Mercury
Brisbane	17	Crocker Park Recreation Trail. APNs 005180060-2 & 005180999	FY 25-26	Identified	Meet with Municipality	0.7	0.2	--
San Carlos	75	275 Industrial Ave. APN 046051999	FY 25-26	Identified	Meet with Municipality	18.4	4.8	--
South San Francisco	294	233 E Harris Ave. APN 015134340	FY 24-25	Identified	Meet with Municipality	2.1	0.5	--
TBD			FY 26-27	Anticipated	TBD	40	10	0.98
Totals						61	10.5	0.98

CONTROLS FOR PUBLIC ROW AREAS IN CATCHMENTS WITH ELEVATED PCBs OR MERCURY

Storm Drain Line Flush and Capture Cleanouts

Enhanced O&M, including MS4 storm line flush-and-capture cleanouts, are anticipated in future years in areas of the MS4 determined to be at risk of PCBs loading from Source Properties and MPCPs. Once initiated, line cleanouts are ongoing and projected to expand year over year during the remainder of the MRP 3.0 permit term. Such cleanouts, when triggered by a Source Property referral, are typically conducted or caused to be conducted annually by Permittees until the property abatement is completed. When cleanouts are triggered by elevated PCBs or mercury in the public ROW, follow-up sampling may be conducted in the future to determine if additional cleanouts are needed.

Line cleanouts during MRP 3.0 are anticipated in at least **15,300 linear feet** of storm drain lines in the cities of San Carlos, Redwood City, and South San Francisco. These cleanouts are expected to remove approximately **3,213 kgs** of fine sediment, providing an annual average load reduction of **3.2 g/yr of PCBs and 3.2 g/yr of mercury**, under the assumption these actions (or equivalent) will be repeated every year. Details of the planned line cleanouts during MRP 3.0 are described in Table 3.2 and shown in **Attachment B**.

Table 3.2. Stormline Cleanouts in San Mateo County during MRP 3.0.^{a,b}

Cleanout Conducted During	Permittee	WMA Number	MS4 Segment Length (ft)	Estimated Fine Sediment Mass Removed (kg) ^a
FY 26-27 (anticipated)	San Carlos	210	7,182	1,508
FY 26-27 (anticipated)	Redwood City	379	3,503	736
FY 26-27 (anticipated)	South San Francisco	294	4,615	969
Totals			15,300	3,213

WMA = Watershed Management Unit.

^a Sediment mass removed is estimated based on the measured mass of sediment removed multiplied by the fraction of fine sediment less than 63 μm , which is assumed to be 15%. Where direct measurements are not available, sediment mass removed is estimated to be equal to 1.4 kg/linear foot of storm line, per the Source Control Load Reduction Accounting for Reasonable Assurance Analysis, June 2026 (Appendix 11-2 of the Programs FY2026 Annual Report), multiplied by the fraction of fine sediment less than 63 μm , which is assumed to be 15%.

^b Sediment Concentration values for PCBs and mercury were assumed to be at the source property threshold (1.0 mg/kg) because the catchments areas draining to these storm drain lines have multiple high source properties in them, and high PCBs and mercury concentrations have been measured in sediment in these catchments ranging from (0.35 mg/kg to 16.8 mg/kg Total PCBs and 0.30 to 6.76 mg/kg Mercury).

BELMONT CREEK / HIGHWAY 101 CULVERT MAINTENANCE PROGRAM

During FY 2025/26, targeted removal of stream sediment (channel de-silting) and PCBs evaluations of removed sediment were conducted in Belmont Creek culverts underneath Highway 101 in the City of San Carlos, a location that drains approximately 30 acres of old industrial land uses, including two high PCBs source properties and one MPCP. This effort removed approximately 6.2 g of PCBs. Assuming this effort is repeated about every five years, this equates to a PCBs load reduction of **1.24 g/yr**.

OTHER CONTROLS

Implementation of GI and other stormwater treatment controls from OI land use areas is provided in Section 4.

SECTION 4 -GREEN INFRASTRUCTURE AND OTHER STORMWATER TREATMENT CONTROLS

This section describes GI and other stormwater treatment controls that provide load reduction benefits for mercury and PCBs, demonstrates continuation of controls implemented during MRP 2.0, and provides documentation of the projects built and installed during MRP 3.0 to date (i.e., between July 1, 2021, and June 30, 2026) and anticipated during FY 2026/27. All supporting data required to calculate the mercury and PCBs loads reduced for these systems are also described. All projects that treat old industrial land use areas are identified.

CONTROL MEASURE DESCRIPTION

GREEN INFRASTRUCTURE (GI)

GI facilities are stormwater management systems that use vegetation, soils, and natural processes to capture and treat stormwater runoff and improve water quality. Examples of GI include bioretention, sustainable streets, and other systems that generally use the natural filtration or infiltration of stormwater.

There are three main categories of GI facilities, which are largely based on their location and extent of upstream catchment area:

1. **Parcel-based New Development and Redevelopment Projects.** These projects include LID treatment measures that are designed to capture/treat runoff generated on a parcel. LID measures are implemented during development or re-development of a parcel and are currently required by the MRP for any project creating or replacing greater than 5,000 square feet of impervious area. These projects can be located on either publicly- or privately-owned parcels.
2. **Public Sustainable Street Projects.** These projects include GI facilities that are located along or within a street or public ROW. They are typically designed to capture and treat runoff from the street and possibly portions of adjacent parcels.
3. **Regional Retrofit Projects.** These projects include parcel-based GI measures that capture runoff from off-site areas. Typically located on publicly owned lands, development and implementation of regional projects may involve collaboration among multiple municipalities and/or public agencies to construct large facilities that capture and treat stormwater from large drainage areas. Collaboration among multiple jurisdictions may allow for larger projects with greater economies of scale, specifically cost-sharing opportunities and greater flood control and pollutant reduction capacity.

The most common types of GI facilities that are constructed in urban areas include bioretention, stormwater tree well filters, pervious pavement, infiltration facilities, green roofs, and rainwater harvesting and use facilities.

OTHER STORMWATER TREATMENT SYSTEMS

High-flow capacity and inlet-based stormwater treatment systems are devices or series of devices that trap all particles retained by a 5 mm mesh screen and have a design treatment capacity of not less than the peak flow rate resulting from a one-year, one-hour storm in the tributary drainage catchment area. The State and

Regional Water Boards have approved a variety of proprietary stormwater treatment devices as achieving full trash capture. These systems are grouped into two general categories - “large devices” (i.e., high-flow capacity systems), treating hundreds of acres, and “small devices” (i.e., catch basin inserts), typically treating an acre or less of land. Examples of large devices include hydrodynamic separator (HDS) devices, debris-separating baffle boxes (DSBBs) and in-line gross solid removal devices (GSRDs). Small inlet-based devices are generally screens or baskets that are installed in storm drain catch basins or inlets.

The locations of GI projects and other stormwater treatment systems are illustrated on control measure maps included as **Attachment B**. These maps include all stormwater treatment projects reported to date within San Mateo County since the start of the PCBs TMDL (i.e., about 2002).

KEY PLANNING AND EVALUATION EFFORTS TO SUPPORT FUTURE IMPLEMENTATION OF PUBLIC GI PROJECTS

San Mateo County Permittees have conducted a number of key planning and evaluation efforts to support future implementation of public GI projects in San Mateo County. These include development of the San Mateo County Stormwater Resource Plan in 2017, Permittee-specific Green Infrastructure Plans completed in 2019, and an additional countywide analysis completed in 2022 of regional stormwater capture project opportunities based on key performance indicators, including control of PCBs. The guidance, tools, project concepts, and prioritized project opportunity maps developed through these efforts provide a foundation for public GI planning and implementation during MRP 3.0. It is important to note that these analyses and planning efforts have illustrated the challenges with identifying old industrial land use areas or other areas with moderate/high PCBs that are feasible and cost-effective to treat via GI in the public ROW. Despite the comprehensive evaluation processes, which included potential for PCBs load reduction as a priority screening factor, the potential for PCBs load reduction via feasible public ROW GI opportunities identified to date, including sustainable streets and regional stormwater capture projects, has been relatively small.

CONTINUATION OF MRP 2.0 ACTIONS FOR LOAD REDUCTION CREDIT

During MRP 2.0, SMCWPPP Permittees were credited with 790 g/yr mercury and 334 g/yr PCBs for implementation of GI/LID and other stormwater treatment controls through June 30, 2021, as reported in the FY 2020/21 Annual Report (SMCWPPP 2021). This included treatment of nearly 1,200 acres by GI/LID, and treatment of more than 500 acres via other stormwater treatment controls. These projects are identified in each municipality on the maps provided in **Attachment B**. To continue to receive load reduction credit for these controls, SMCWPPP Permittees must conduct inspections to ensure GI/LID projects built according to MRP Provision C.3 regulations are properly maintained and operated. SMCWPPP Permittees have continued to implement their ongoing C.3 inspection programs to ensure appropriate maintenance for all C.3 regulated projects. SMCWPPP Permittees report on inspections conducted each year at C.3 regulated projects in their Annual Reports to the Water Board. In addition, SMCWPPP Permittees conduct the appropriate maintenance to ensure proper functioning of all public sustainable street projects and full trash capture devices located within the public ROW. These efforts are fully documented in SMCWPPP Permittee Annual Reports submitted in September of each year to the Water Board.

GI/LID PROJECTS DURING MRP 3.0

Permittees continue to track and report on all completed GI projects in San Mateo County via the San Mateo County GI Tracking Tool. The information on these projects in the GI Tracking Tool provides all the information that is used to estimate the mercury and PCBs load reductions associated with projects constructed through FY 2024/25, and FY 2025/26 projects will be added to the GI Tracking Tool early in FY 2026/27. In addition, GI modeling was done as part of the development of the updated PCBs and Mercury TMDL Implementation Plan and RAA Plan submitted to the Water Board in June 2026. However, because this modeling was focused on demonstrating when the TMDL Wasteload allocations could be achieved, the modeling outputs did not provide PCBs load reductions achieved during MRP 3.0. Therefore, it was not possible to use those model outputs to estimate loads reduced during MRP 3.0 for most types of GI projects, with the exception of the Orange Memorial Park Regional Stormwater Capture Project, which was modeled individually and completed during MRP3. To estimate the loads reduced for all other GI projects completed (or planned) for the period between FY 2021/22 and FY 2026/27, the simple accounting method presented in the *Source Control Load Reduction Accounting for Reasonable Assurance Analysis* (SCLRA) (BASMAA 2022) was used. All of the information for those calculations is presented in Table 4.1 and Table 4.2. The data collected on all GI projects that have been completed for credit during MRP 3.0 to date (i.e., since July 1, 2021)³ and on planned projects that are expected to be completed by the end of the MRP 3.0 permit term (i.e. June 30, 2027) are summarized in Table 4.1 for public sustainable streets; Table 4.2 for parcel-based C.3 redevelopment projects; and Table 4.3 for regional stormwater capture projects. These projects are also shown on Permittee maps in **Attachment B**. The information available for the current reporting year is considered preliminary, as the data on all projects completed in FY 2025/26 may not be available until after FY 2025/26 annual reporting, and information on projects that are expected to be completed during the permit term is subject to change. However, Permittees will continue to gather this information as it becomes available and subsequent Annual Reports will be updated as needed. To ensure Permittees document all newly completed GI projects within their jurisdictions during MRP 3.0, all projects completed since the start of FY 2021/22 are included in these tables.

During MRP 3.0, Permittees have completed installation of sustainable streets treating a total of **32 acres**, including **3.6 acres** of old industrial land use areas (See Table 4.1); parcel-based GI/LID redevelopment projects MRP 3.0 on a total of **809 acres**, including **186 acres** of old industrial land use areas (See Table 4.2); and a regional stormwater capture project in the city of South San Francisco (Orange Memorial Park Stormwater Capture Project). The regional stormwater capture project treats approximately 16% of the runoff from a drainage area that is nearly **2,500 acres**, including **38 acres** of OI areas (See Table 4.3). The anticipated loads reduced for all of these GI projects through the end of FY 2026/27 is **73 g/yr of PCBs and 48 g/yr of mercury** during MRP 3.0. Of those load reductions, **49 g/yr of PCBs and 9 g/yr of mercury are for the projects that treat OI land use areas**. That number is expected to increase by the end of the MRP 3.0 permit term as additional projects will likely be completed during FY 2026/27.

³ Data on projects that were built during previous fiscal years (FY 21/22, FY 22/23, FY 23/24, and FY24/25) but were not reported in V.3 of this Control Measures Report because the information was not yet available are documented in this Control Measure Report. These are projects for which load reduction credit under C.11/12 will be achieved during MRP 3.0.

Table 4.1. Land areas treated by public sustainable street projects constructed and expected in San Mateo County during the MRP 3.0 permit term (FY 2021/22 through FY 2026/27).

Agency	Fiscal Year (FY) Built ^a	WMA ID	Total Area (Acres)	Area by Land Use Category (Acres)				
				Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/ Open Space
Atherton	FY22-23	Other-ATH	0.1	0	0	0.1	0	0
	FY24-25	261	0.1	0	0	0.1	0	0
		Other-ATH	0.04	0	0	0	0	0
	FY25-26	261	0.2	0	0	0.2	0	0
	Atherton Total		0.4	0	0	0.3	0	0
Belmont	FY22-23	Other-BEL	4.0	0	0	4.0	0	0
	FY25-26	Other-BEL	0.2	0	0	0.2	0	0
	Belmont Total		4.2	0	0	4.2	0	0
Burlingame	FY22-23	Other-BUR	0.5	0	0.5	0	0	0
	Burlingame Total		0.5	0	0.5	0	0	0
East Palo Alto	FY23-24	71	1.7	0	0	1.7	0	0
		72	0	0	0	0	0	0
	East Palo Alto Total		1.7	0	0	1.7	0	0
Foster City	FY25-26	1010	0.4	0	0.4	0	0	0
	Foster City Total		0.4	0	0.4	0	0	0
Half Moon Bay	FY24-25	Ocean	0.8	0	0	0.8	0	0
	Half Moon Bay Total		0.8	0	0	0.8	0	0
Hillsborough	FY23-24	Other-HIL	0.4	0	0	0	0	0.4
	FY24-25	Other-HIL	0.3	0.3	0	0	0	0
	Hillsborough Total		0.6	0.3	0	0	0	0.4
Menlo Park	FY22-23	238A	1.1	0	1.1	0	0	0
	Menlo Park Total		1.1	0	1.1	0	0	0
Pacifica	FY22-23	Ocean	0	0	0	0	0	0
	Pacifica Total		0	0	0	0	0	0
Redwood City	FY21-22	266	0.5	0.1	0.3	0	0	0
		Other-RCY	0.4	0.1	0.1	0.2	0	0
	FY22-23	1000	3.1	3.1	0	0	0	0
	FY25-26	379	1.9	0	1.9	0	0	0
		Other-RCY	0.2	0	0	0.2	0	0
	Redwood City Total		6.1	3.3	2.4	0.4	0	0
San Carlos	FY21-22	Other-SCS	1.4	0	0	1.4	0	0
	FY22-23	Other-SCS	1.0	0	0	1.0	0	0
	FY25-26	Other-SCS	0.5	0	0	0.5	0	0
	San Carlos Total		2.9	0	0	2.9	0	0

Agency	Fiscal Year (FY) Built ^a	WMA ID	Total Area (Acres)	Area by Land Use Category (Acres)				
				Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/ Open Space
San Mateo	FY21-22	Other-SMO	2.3	0	2.3	0	0	0
	San Mateo Total		2.3	0	2.3	0	0	0
San Mateo County	FY22-23	Other-SMC	1.2	0	0	1.2	0	0
	FY25-26	Other-SMC	9.0	0	0	9.0	0	0
	FY26-27	Other-SMC	2.9	0	0	2.9	0	0
	San Mateo County Total		13.1	0	0	13.1	0	0
South San Francisco	FY21-22	293	0	0	0	0	0	0
	FY25-26	307	0.4	0	0.4	0	0	0
	South San Francisco Total		0.4	0	0.4	0	0	0
Sustainable Street Total			35	3.6	7.2	23	0	0.4

Table 4.2. Land areas treated by parcel-based Green Infrastructure/Low Impact Development (GI/LID) projects constructed and expected in San Mateo County during the MRP 3.0 permit term (FY 2021/22 – FY 2026/27).

Agency	Fiscal Year (FY) Built	WMA ID	Total Area (Acres)	Area by Land Use Category (Acres)				
				Old Industrial	Old Urban - Commercial/ Transportation	Old Urban - Residential	New Urban	Ag/ Open Space
Atherton	FY21-22	Other-ATH	7.0	0	4.8	2.3	0	0
	FY22-23	261	0.9	0	0	0.9	0	0
		Other-ATH	1.0	0	0	1.0	0	0
	FY23-24	261	8.2	0	0	8.2	0	0
		Other-ATH	13	0	0	13	0	0
	FY24-25	261	3.1	0	0	3.1	0	0
		Other-ATH	4.4	0	0	4.4	0	0
	FY25-26	261	13	0	0	13	0	0
		Other-ATH	11	0	0	11	0	0
Atherton Total			61	0	4.8	56	0	0
Belmont	FY21-22	Other-BEL	2.6	0	2.6	0.1	0	0
	FY22-23	1011	0.7	0.1	0.01	0.4	0	0.2
		Other-BEL	0.3	0	0	0.3	0	0
	FY23-24	77	2.1	2.0	0.04	0	0	0
		Other-BEL	2.0	0	0	0	0	2.0
	FY24-25	17A	1.7	0.02	1.5	0.2	0	0
	Belmont Total			9.4	2.2	4.1	1.0	0

Agency	Fiscal Year (FY) Built	WMA ID	Total Area (Acres)	Area by Land Use Category (Acres)				
				Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/Open Space
Brisbane	FY21-22	1004A	29	29	0	0	0	0
	FY23-24	Other-BRI	31	0	0	0	2.5	28
	FY24-25	17A	2.1	2.1	0	0	0	0
	Brisbane Total		62	31	0	0	2.5	28
Burlingame	FY21-22	139	5.3	5.3	0	0	0	0
		Other-BUR	0.9	0	0.5	0.4	0	0
	FY22-23	149	0.1	0.1	0.002	0	0	0
		Other-BUR	16	0.5	1.4	14	0	0.02
	FY23-24	Other-BUR	1.5	0	1.5	0	0	0
	FY24-25	85	1.2	0.01	1.2	0	0	0
		164	2.8	2.8	0.001	0	0	0
		1006	0.7	0	0.7	0	0	0
		Other-BUR	61	0	11	45	0.1	5.1
	FY25-26	164	6.7	5.0	1.7	0.002	0	0.01
		Other-BUR	0.4	0	0.4	0	0	0
	Burlingame Total		97	14	19	60	0.1	5.1
Colma	FY23-24	Other-COL	3.8	0	0	0	0	3.8
	FY24-25	Other-COL	0.3	0	0.3	0	0	0
	Colma Total		4.1	0	0.3	0	0	3.8
Daly City	FY21-22	329	0.2	0	0.2	0	0	0
	FY24-25	Ocean	2.4	0	2.4	0	0	0
	Daly City Total		2.5	0	2.5	0	0	0
East Palo Alto	FY23-24	68	3.3	0	0	3.3	0	0
	FY24-25	70	2.6	2.6	0	0	0	0.03
	East Palo Alto Total		5.9	2.6	0	3.3	0	0.03
Foster City	FY22-23	1010	6.3	0	0	0	6.3	0
		Other-FCY	19	0	3.6	1.3	0	14
	FY25-26	1010	4.2	4.1	0.1	0	0	0
	Foster City Total		29	4.1	3.7	1.3	6.3	14
Half Moon Bay	FY22-23	Ocean	2.8	0	2.8	0	0	0
	FY23-24	Ocean	2.6	0	0.1	0.1	0	2.4
	FY24-25	Ocean	4.1	0	0.01	0	0	4.1
	Half Moon Bay Total		9.6	0	3.0	0.1	0	6.5
Hillsborough	FY25-26	Other-HIL	1.4	0	1.3	0.1	0	0
	Hillsborough Total		1.4	0	1.3	0.1	0	0

Agency	Fiscal Year (FY) Built	WMA ID	Total Area (Acres)	Area by Land Use Category (Acres)				
				Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/ Open Space
Menlo Park	FY21-22	66	0.7	0.7	0	0	0	0
		238	15	15	0.05	0	0	0
		252	4.9	3.2	1.7	0	0	0
	FY22-23	247	5.0	0	0	5.0	0	0
		Other-MPK	8.5	6.7	0.8	0	0	1.0
	FY23-24	71	3.0	0	0	3.0	0	0
		247	0.5	0	0.5	0	0	0
		1014	2.3	2.3	0.01	0	0	0
		238A	9.7	2.7	0.05	6.9	0	0
		238B	3.0	3.0	0.04	0	0	0
	Menlo Park Total		53	34	3.2	14.8	0	1.0
Millbrae	FY21-22	1005	0.8	0	0.8	0	0	0
	FY23-24	1005	10	0.01	10.3	0	0	0
	Millbrae Total		11	0.01	11.1	0	0	0
Pacifica	FY24-25	Ocean	0.7	0	0.7	0	0	0
	FY25-26	Ocean	1.2	0	0	0	0	1.2
	Pacifica Total		1.9	0	0.7	0	0	1.2
Portola Valley	FY21-22	Other-PVY	12	0	0	12	0	0
	FY25-26	Other-PVY	1.2	0	1.2	0	0	0
	Portola Valley Total		13	0	1.2	12	0	0

Agency	Fiscal Year (FY) Built	WMA ID	Total Area (Acres)	Area by Land Use Category (Acres)				
				Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/ Open Space
Redwood City	FY21-22	266	0.4	0	0.4	0	0	0
		269	4.4	0	0	0	4.4	0
		388	0.7	0.2	0.3	0.1	0	0
		Other-RCY	27	1.2	15	3.3	7.6	0
	FY22-23	266	2.6	2.5	0	0	0.1	0
		324	0.1	0.1	0.01	0.001	0	0
		336	1.8	0	1.8	0	0	0
		379A	5.2	5.2	0.01	0.02	0	0
		Other-RCY	8.9	0	7.5	1.4	0	0
		Other-SMC	0.3	0	0	0.3	0	0
	FY23-24	379A	1.1	0.2	0.8	0	0	0
		Other-RCY	2.0	0	0	1.9	0	0.1
	FY24-25	261	0.5	0	0.5	0	0	0
		1011	4.7	0	0	0	4.7	0.02
		Other-RCY	3.5	1.2	0.03	0.8	1.5	0
	FY25-26	261	0.4	0	0.4	0.02	0	0
		323	0.2	0	0	0.2	0	0
		379	11	0	11	0	0	0
	FY26-27	388	1.2	0	1.2	0.001	0	0
		Other-RCY	3.5	0	0	3.5	0	0
		Other-RCY	0.2	0	0	0.2	0	0
	Redwood City Total		80	11	39	12	18	0.1
San Bruno	FY21-22	Other-SBO	0.7	0	0.001	0.7	0	0
	FY22-23	290	3.7	0	3.7	0.1	0	0
	FY24-25	290	0.6	0.2	0.5	0	0	0
		Other-SBO	28	0	0.04	28	0	0
	San Bruno Total		33	0.2	4.2	29	0	0
San Carlos	FY21-22	32	0.6	0	0.6	0	0	0
		Other-SCS	0.5	0	0	0.5	0	0
	FY22-23	75	2.0	2.0	0.002	0	0	0
		1011B	3.3	0.1	3.2	0	0	0
		Other-SCS	0.7	0	0.1	0.6	0	0
	FY23-24	1016	1.6	1.5	0.1	0	0	0
		Other-SCS	1.8	0	0	0	0	1.8
	FY24-25	57	0.3	0	0	0.3	0	0
		1016	1.0	1.0	0	0	0	0
		Other-SCS	0.2	0	0.2	0.0001	0	0
	San Carlos Total		12	4.6	4.2	1.3	0	1.8

Agency	Fiscal Year (FY) Built	WMA ID	Total Area (Acres)	Area by Land Use Category (Acres)				
				Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/ Open Space
San Mateo	FY21-22	156	1.1	0.1	1.0	0	0	0
		1009	12	12	0.1	0	0	0
		Other-SMO	0.4	0	0	0	0.4	0
	FY22-23	111	0.9	0.4	0.5	0	0	0
		149	1.3	0	0	1.2	0	0.1
		1007	0.9	0	0.9	0	0	0
		Other-SMO	9.8	0	9.1	0.3	0	0.4
	FY23-24	111	2.4	0.01	1.2	0	0	1.2
	San Mateo Total		29	12	13	1.5	0.4	1.8
San Mateo County	FY21-22	327A	4.0	3.9	0.05	0	0	0
		Other-SMC	2.3	0	0	2.3	0	0
		Other-SMO	5.6	0	0	5.6	0	0
	FY22-23	327A	1.4	1.1	0.3	0	0	0
		Ocean	0.7	0	0	0	0	0.7
		Other-SMC	3.1	0	0	2.5	0	0.6
		Other-SMO	0.3	0	0	0.3	0	0
	FY23-24	379	1.4	0	0.8	0.6	0	0
		1000	4.6	4.3	0	0	0.2	0.1
		Ocean	163	0	0	0.002	0	163
		Other-SMC	0.7	0	0.5	0.1	0	0
	FY24-25	379A	0.5	0.5	0	0.004	0	0
		Ocean	10	0	0	0	0	10
		Other-SMC	2.4	0	1.6	0.8	0.01	0.01
	FY25-26	327	1.4	0	1.4	0	0	0
		Other-SMC	3.3	0	1.8	0.7	0	0.8
	San Mateo County Total		205	9.8	6.4	13	0.2	176

Agency	Fiscal Year (FY) Built	WMA ID	Total Area (Acres)	Area by Land Use Category (Acres)					
				Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/ Open Space	
South San Francisco	FY21-22	293	5.3	4.2	1.2	0	0	0	
		296	0.5	0	0.5	0	0	0	
		307	7.9	0	7.9	0	0	0	
		316	1.6	1.6	0	0	0	0	
		319	2.0	2.0	0	0	0	0	
		357	1.5	0	1.5	0	0	0	
		Other-SSF	1.6	0	1.6	0	0	0	
	FY22-23	313	12	12	0	0	0	0	
		1001	1.7	0	1.0	0	0	0.7	
	FY23-24	293	2.4	1.0	1.4	0	0	0	
		1001D	1.3	1.3	0	0	0	0	
		239A	6.0	6.0	0	0	0	0	
		293A	2.8	2.8	0.02	0	0	0	
		Other-SSF	1.3	0	0.8	0	0	0.4	
	FY24-25	293	2.0	2.0	0	0	0	0	
		296	1.6	0	0	0	0	1.6	
		298	0.2	0	0	0.2	0	0	
		314	6.1	6.0	0.1	0	0	0	
		315	5.1	2.9	2.2	0	0	0	
		1002	8.6	7.6	1.0	0	0	0.01	
	FY25-26	319	9.9	9.9	0.1	0	0	0	
		Other-SSF	3.0	0	1.4	0	0	1.7	
	FY26-27	293	1.9	1.9	0.03	0	0	0	
		297	0.3	0	0	0.3	0	0	
		315	7.5	7.3	0.1	0	0	0	
		Other-SSF	0.4	0	0.2	0	0	0.2	
	South San Francisco Total			95	69	21	0.6	0	4.6
	Woodside	FY21-22	Other-WDE	2.7	0	0	2.3	0	0.3
		FY24-25	Other-WDE	1.0	0	0.1	0.9	0	0
		FY25-26	Other-WDE	1.0	0	0	1.0	0	0
Woodside Total		4.7	0	0.1	4.2	0	0.3		
Parcel-based GI Total			809	184	142	209	28	246	

^a Any projects built during FY 2025-26, but not reported here because data are unavailable will be reported in the FY 2026-27 Annual Report.

Table 4.3. Land areas treated by public regional stormwater capture projects constructed and expected in San Mateo County during the MRP 3 permit term (FY 2021/22 through FY 2026/27).

Agency	Fiscal Year (FY) Built	WMA ID	Total Area (Acres)	Area by Land Use Category (Acres)				
				Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/Open Space
South San Francisco	FY22-23	1001	2,486	38	451	1,042	3.4	952
Regional Capture Facility Total			2,486^a	38	451	1,042	3.4	952

a. Approximately 16% of the Orange Memorial Park drainage management area (DMA) is considered fully treated which is the area used for calculating load reductions.

OTHER STORMWATER TREATMENT SYSTEMS DURING MRP 3.0

Permittees continue to track and report on all completed high-flow capacity and inlet-based stormwater treatment systems/devices that have been installed during MRP 3.0 to date in San Mateo County (Tables 4.4 and 4.5). These devices and treatment systems are also shown on Permittee maps in **Attachment B**. The data required to calculate mercury and PCBs load reductions for these projects, including the device type, and the area treated by land use category are provided in Tables 4.4 and 4.5. Some portion of the areas treated by the systems/devices shown in Tables 4.4 and 4.5 may also be addressed by GI/LID projects, which is noted in the table footnotes. Any overlapping areas also treated by GI/LID were removed prior to calculating the loads reduced for these projects. There are over **2,200 acres** across San Mateo County that are being treated by small, inlet-based devices installed during MRP 3.0 to date which includes treatment of **242 acres** of old industrial land uses. There are an additional **1,625 acres** treated via high-flow capacity stormwater treatment systems installed during MRP 3.0 to date, including treatment of **26 acres** of old industrial land use areas. Together, these other treatment systems are providing estimated load reductions of **24 g/yr PCBs and 41 g/yr mercury** in MRP 3.0 to date. Of these, **13 g/yr of PCBs and 2.6 g/yr of mercury** were achieved in OI land use areas. Permittees are not expected to install additional high-flow capacity or inlet-based stormwater treatment systems/devices during the rest of the permit term

Table 4.4. Land areas treated by high flow capacity stormwater treatment devices installed in San Mateo County during MRP 3.0 to date.

Device Type	Agency	Fiscal Year Installed	WMA ID	Total Acres	Area by Land Use Category (Acres)				
					Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/ Open Space
High-Flow Capacity Device	East Palo Alto	FY 25-26	71	784	2.6	196	583	0	2.9
	San Mateo	FY 22-23	Other - SMO	300	4.6	68	223	0	4.5
	Unincorporated San Mateo County	FY 23-24	Other - SMC	538	17	55	459	0	7.3
	South San Francisco	FY 24-25	1002	1.7	1.6	0.04	0	0	0
			Other - SSF	1.2	0	0.003	1.2	0	0
High-Flow Capacity Device Total				1,625	26	319	1,266	0	15

Table 4.5. Land areas treated by inlet-based stormwater treatment devices installed in San Mateo County during MRP 3.0 to date.

Device Type	Agency	Fiscal Year Installed	WMA ID	Total Acres	Area by Land Use Category (Acres)				
					Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/Open Space
Catch-Basin Insert Device	Belmont	FY 24-25	60	1.1	0	0.7	0.00003	0	0.5
			1011	2.5	0.4	2.2	0	0	0
			Other - BEL	10.0	0	6.5	3.5	0	0
	Burlingame	FY 24-25	85	1.8	0.001	1.8	0	0	0
			139	2.6	0	0	2.6	0	0
			141	6.3	5.0	1.3	0	0	0
			149	1.2	0.9	0.4	0	0	0
			164	1.3	0	0.0	1.3	0	0
			166	2.7	0.6	1.0	1.1	0	0
			1005	3.1	0	3.1	0	0	0
			1006	0.4	0.04	0.4	0	0	0
			1006A	4.7	1.9	2.8	0	0	0
			Other - BUR	12.1	0.2	4.7	7.2	0	0.01
		FY 25-26	141	1.9	0	0.1	1.8	0	0
			164	0.7	0	0.004	0.7	0	0
			1006	4.2	0.3	2.9	0.7	0	0.2
			Other - BUR	3.9	0.8	2.2	0.9	0	0
	Colma	FY 23-24	Other - COL	6.4	0	6.4	0	0	0
	Daly City	FY 21-22	329	32.6	0	33	0	0	0
		FY 22-23	329	1.7	0	1.7	0	0	0
			Other - DCY	14.6	0	15	0	0	0

Device Type	Agency	Fiscal Year Installed	WMA ID	Total Acres	Area by Land Use Category (Acres)				
					Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/Open Space
Catch-Basin Insert Device	Daly City (cont.)	FY 24-25	181	7.6	0.2	7.4	0	0	0
			329	4.7	0	4.7	0.01	0	0
			Colma Creek Upper	6.6	0.00001	6.0	0.2	0	0.4
			Non MRP area	59	0	28	30	0	1.1
			Other - DCY	9.0	0	6.8	2.2	0	0.0001
		FY 25-26	307	1.4	0	0.9	0.5	0	0
			Non MRP area	11.5	0	5.0	3.2	0	3.2
	East Palo Alto	FY 24-25	67	20.1	9.8	8.7	1.6	0.1	0.000004
			Other - EPA	54	0	6.4	46	1.3	0.1
		FY 25-26	67	70	2.3	0.3	59	0	9.1
			1015	6	5.3	0.3	0	0	0.3
			Other - EPA	50	0.2	0.4	46	0.01	3.6
	Menlo Park	FY 24-25	71	3.1	0	2.3	0.9	0	0
			252	1.1	0	1.1	0.001	0	0.02
			Other - MPK	4	0	1.1	2.9	0	0
	Milbrae	FY 21-22	1005	1.1	0	1.1	0	0	0
			Other - MIL	37.0	0.2	10	27	0	0.03
			Other - SBO	21.7	0	20	1.4	0	0
		FY 22-23	Other - MIL	17	0	6.9	10	0	0.0
		FY 24-25	1005	18	8.1	9.2	0.8	0	0.4
			Other - MIL	14.8	0.1	5.4	9.3	0	0

Device Type	Agency	Fiscal Year Installed	WMA ID	Total Acres	Area by Land Use Category (Acres)				
					Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/Open Space
Catch-Basin Insert Device	Redwood City	FY 25-26	253	3	0	2.7	0.02	0	0
			261	36	0.9	15	18.8	0	1.0
			266	9.1	0.2	4.7	4.2	0	0
			267	1.7	0.1	1.6	0	0	0
			269	12.0	3.9	0.1	0	1.5	6.6
			323	5.7	0	2.3	3.3	0	0
			324	14.2	1.3	1.6	11	0	0
			327	19.8	3.4	12	3.9	0	0
			336	0.3	0	0.3	0	0	0
			337	7.8	1.0	1.3	5.5	0	0
			379	24.8	7.7	7.6	9.5	0	0.1
			388	8.4	0	1.4	7.0	0	0
			407	0.7	0	0.02	0	0.02	0.7
			1000	4.3	1.6	0	0	2.0	0.7
			1013	2.7	0.5	0.8	0.9	0	0.5
			Other - RCY	86.3	0.7	25	60	0	0.8
	San Bruno	FY 22-23	290	90.8	1.8	21	56	0	12
			296	2.9	0	2.9	0.01	0	0.01
			307	13.4	0	7.1	6.3	0	0
			1005	32.0	0.7	7.5	24	0	0
			Other - SBO	28.8	0	19	9.3	0	0.1
		FY 23-24	1005	12.9	0.1	6.6	6.2	0	0.005

Device Type	Agency	Fiscal Year Installed	WMA ID	Total Acres	Area by Land Use Category (Acres)				
					Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/Open Space
Catch-Basin Insert Device	San Bruno (cont.)	FY 24-25	290	32	1.1	23	6.8	0	0.5
			292	14.0	13	1.2	0	0	0
			296	4.4	0	1.9	0	0	2.5
		FY 25-26	290	12.2	0	4.7	4.6	0	2.9
	San Carlos	FY 24-25	1011	0.8	0.2	0.6	0	0	0
			1016	5.4	4.9	0.6	0	0	0
			1011A	6.8	5.3	1.5	0	0	0.003
			1011B	0.1	0.001	0.1	0	0	0
			Other - SCS	14.6	0	4.3	10	0	0.3
	San Mateo	FY 24-25	25	2	0	0.3	1.3	0	0
			89	21.2	4.8	10	6.3	0	0
			92	6	0	5.7	0.1	0	0.3
			111	12.5	0.3	4.0	8.1	0	0
			114	10.1	4.0	3.2	2.9	0	0
			156	9	0	3.8	5.2	0	0.1
			399	4	0	0	3.9	0	0
			403	1.1	0.4	0.3	0.4	0	0
			408	9.9	0	3.5	6.0	0	0.5
			1007	21.4	1.0	3.4	16	0	0.5
			1008	1.1	0	0.1	1.0	0	0.03
			1009	40.4	12	17	12	0	0.1
			1017	3	2.0	1.3	0	0	0
			Other - SMC	4.2	0	0.2	0.03	0	4.0
			Other - SMO	269.5	2.8	123	119	22	1.8

Device Type	Agency	Fiscal Year Installed	WMA ID	Total Acres	Area by Land Use Category (Acres)				
					Old Industrial	Old Urban - Commercial/Transportation	Old Urban - Residential	New Urban	Ag/Open Space
Catch-Basin Insert Device	San Mateo (cont.)	FY 24-25 (cont.)	SM-SMO-16THCH_A	64	0	16	46	0	1.9
	Unincorporated San Mateo County	FY 23-24	77	3	2.2	0.4	0	0	0
			379	38	18	7.2	13	0	0.2
			1011	10	6.6	3.4	0.3	0	0
			Non MRP area	53	0	0.6	53	0	0.2
			Other - SMC	4	0	0	3.6	0	0
		FY 24-25	379	44	15	5.9	23	0	0.5
			1011	9	5.9	3.5	0	0	0
			Non MRP area	2	0	1.5	0	0	0.1
			Other - SMC	1	0	0.5	0	0	0
		FY 25-26	247	0	0	0	0.4	0	0
			253	64	0	3.6	60	0	0
			Non MRP area	24	0	0.2	23	0	0.6
			Other - SMC	0	0	0	0.2	0	0
	South San Francisco	FY 23-24	293	40	14	20	4.6	0	2.1
			296	26.1	5.6	13	7.7	0	0.01
			306	2.9	2.0	0.8	0	0	0
			307	106	0	16	90	0	0.5
			313	1.0	0	1.0	0	0	0
			316	5.7	4.1	1.7	0	0	0
			318	15.3	13	2.2	0	0	0
			319	1.5	0.3	1.2	0	0	0
			352	4.1	0	0.8	3.3	0	0
			362	12.7	11	1.4	0	0	0

Device Type	Agency	Fiscal Year Installed	WMA ID	Total Acres	Area by Land Use Category (Acres)					
					Old Industrial	Old Urban - Commercial/ Transportation	Old Urban - Residential	New Urban	Ag/ Open Space	
Catch-Basin Insert Device	South San Francisco (cont.)	FY 23-24 (cont.)	1001	15.4	6.4	9.1	0	0	0.0003	
			1001E	6.0	4.4	1.6	0	0	0	
			Other - SSF	86.1	0	33	50	0	3.7	
		FY 24-25	293	0.8	0	0.3	0	0	0.5	
			296	2.9	0	2.9	0.1	0	0	
			306	2.9	0.3	0.3	2.3	0	0	
			307	55.6	2.1	23	30	0.3	0.2	
			313	1.9	0	1.9	0	0	0	
			314	3.3	2.7	0.5	0	0	0	
			315	6.8	2.3	4.6	0	0	0	
			316	15.4	13	2.6	0	0	0.01	
			318	0.5	0.0003	0.5	0	0	0	
			1001	7.4	2.0	4.9	0.1	0	0.4	
			1002	1.9	0.04	1.5	0	0	0.4	
			293A	0.9	0.01	0.9	0	0	0	
			Other - SSF	18.4	0	8.3	7.0	0	3.1	
			FY 25-26	293	2.0	1.0	1.0	0.02	0	0
				296	6.7	0	2.4	4.3	0	0
		307		2.5	0	2.3	0.2	0	0	
		315		1.8	0.02	1.8	0	0	0	
		318		1.7	0.3	1.3	0	0	0.2	
		293A		1.3	0.1	1.2	0	0	0	
Catch-Basin Insert Device Total				2,231	242	778	1,113	28	69	

SECTION 5 -CONTROLLING PCBs FROM BRIDGES AND OVERPASSES

This section describes the Program for Controlling PCBs from Bridges and Overpasses that will provide load reduction benefits for PCBs. Future versions of this report will also provide documentation of implementation of this control measure if bridge and overpass replacement occurs.

CONTROL MEASURE DESCRIPTION

The program for controlling PCBs in bridges and overpasses will implement a new Caltrans specification for removal and handling of potentially PCBs-containing materials during bridge and overpass replacement projects for applicable structures (i.e., those built prior to 1980 when PCBs-containing joint sealants and caulk were available). Use of the new specification will prevent or reduce the release of PCBs into the environment by detailing appropriate methods for the removal, handling, and disposal of caulk or sealant materials during infrastructure replacement or joint maintenance projects for applicable structures.

CONTROL MEASURE IMPLEMENTATION

CONTINUATION OF MRP 2.0 ACTIONS FOR LOAD REDUCTION CREDIT

This is a new control measure in MRP 3.0, therefore no controls (or associated load reduction credits) were implemented by SMCWPPP Permittees during MRP 2.0. The new actions implemented during MRP 3.0 to date are described below.

IMPLEMENTATION DURING MRP 3.0

During FY 2022/23, Permittees developed inventories of applicable bridges and overpasses within their jurisdiction which included bridge ownership and replacement schedules. These inventories were submitted with the Program's FY 2022/23 Annual Report.

As of the end of FY 2025/26, the Caltrans specification was not yet available. Permittees will maintain their bridge inventories and in the future, after the Caltrans specification has been finalized, will implement or cause to be implemented the Caltrans specification during all applicable bridge projects that are under the direction of Permittees. However, Permittees do not anticipate that the Caltrans specification will be available during FY 2026/27, so no PCBs load reductions for this control program are expected during MRP 3.0.

SECTION 6 -CONTROLLING PCBs FROM ELECTRICAL UTILITIES

This section describes the Program for Controlling PCBs from Electrical Utilities that will provide load reduction benefits for PCBs, demonstrates controls measures implemented by Permittees during MRP 3.0 to date (i.e., through FY 2025/26) and anticipated during FY 2026/27, and includes all supporting data required to calculate the PCBs loads avoided due to implementation of this control measure.

CONTROL MEASURE DESCRIPTION

For this control measure, municipally-owned electrical utilities will implement the following actions to further avoid/reduce the release of PCBs from oil-filled electrical equipment (OFEE):

1. Develop and implement improved spill response and reporting procedures for PCBs-containing OFEE;
2. Develop and implement a plan to remove all PCBs-containing OFEE from active service; and
3. Document the removal of PCBs-containing OFEE since the start of the PCBs TMDL and in the future until all PCBs-containing OFEE have been removed from active service.

Additionally, it is anticipated that non-municipally owned regional electrical utilities that are not currently subject to PCBs load reduction requirements (i.e., PG&E) have been and will continue to remove PCBs-containing OFEE and document these efforts, past and present, consistent with methods used by applicable MRP permittees.

CONTROL MEASURE IMPLEMENTATION

CONTINUATION OF MRP 2.0 ACTIONS FOR LOAD REDUCTION CREDIT

This is a new control measure in MRP 3.0; therefore no load reduction credits were applied during MRP 2.0.

IMPLEMENTATION DURING MRP 3.0

San Mateo County Permittees do not own or operate any municipal electrical utilities. Thus, most of the related MRP requirements do not apply to San Mateo County Permittees. However, during the permit term to date, Countywide Program staff tracked the activities of the BAMSC Municipal Electrical Utility Workgroup, which was formed to facilitate implementation of the requirements in this sub-provision and ensure coordination across the MRP area.

SECTION 7 -MANAGING PCBs DURING BUILDING DEMOLITION

This section describes the Program for Managing PCBs Containing Materials and Wastes during Building Demolition that provides load reduction benefits for PCBs, demonstrates control measures implemented by Permittees during MRP 3.0 to date (i.e., through FY 2025/26) and anticipated during FY 2026/27, and includes all supporting data required to calculate the PCBs loads reduced.

CONTROL MEASURE DESCRIPTION

Permittees developed and began implementing PCBs in Building Materials control programs by July 1, 2019, as required by MRP 2.0 Provision C.12.f, and are continuing to implement these programs in MRP 3.0. The programs include the following processes:

- Municipalities inform applicable demolition permit applicants that their projects are subject to the program for managing materials with PCBs, necessitating, at a minimum, an initial screening for priority PCBs-containing materials.
- For every applicable demolition project, applicants implement the BASMAA protocol for identifying building materials with PCBs concentrations of 50 ppm and then complete and submit a version of BASMAA's model "PCBs Screening Assessment Form" (Screening Form) or equivalent to the municipality.
- The municipality reviews the Screening Form to make sure it is filled out correctly and is complete and works with the applicant to correct any deficiencies.
- The municipality then issues the demolition permit or equivalent, according to its procedures.
- The municipality sends each completed Screening Form for applicable structures and any supporting documents to its countywide program. The countywide program compiles the forms and works with the other MRP countywide programs to manage and evaluate the data, and to assist Permittees with associated MRP reporting requirements.

Beginning July 1, 2023, Permittees made updates to the PCBs in Building Materials control programs process as required by MRP 3.0 to include the following:

- The municipalities require demolition contractors of applicable structures containing building materials with PCBs concentrations of 50 ppm or greater to provide notification to the municipalities, the Water Board, and United States Environmental Protection Agency (USEPA) at least one week before any demolition is to occur.
- The municipalities have enhanced their construction site control programs to inspect construction sites of applicable structures containing building materials with PCBs concentrations of 50 ppm or greater during demolition, to minimize migration of PCBs into the MS4.
- For demolished applicable structures that had building materials with PCBs concentrations ≥ 50 ppm, the municipalities are requiring verification that materials from demolished buildings were appropriately managed and disposed appropriately according to state/federal regulations.

Applicants that determine, through implementation of the BASMAA protocol, that PCBs exist in priority building materials must follow applicable federal and state laws for handling and disposal. This may include reporting to USEPA, the San Francisco Bay Regional Water Quality Control Board, and the California Department of Toxic Substances Control (DTSC). These agencies may require additional sampling and abatement of PCBs.

Depending on the approach for sampling and removing building materials containing PCBs, the applicant may need to notify or seek advance approval from USEPA before building demolition. Even in circumstances where advance notification to or approval from USEPA is not required before the demolition activity, the disposal of PCBs waste is regulated under Toxic Substances Control Act (TSCA). For example, TSCA requires manifesting the waste for transportation and disposal. (See 40 Code of Federal Regulations (CFR) 761 and 40 CFR 761, Subpart K.) TSCA-regulated does not equate solely to materials containing PCBs at or above 50 ppm. There are circumstances in which materials containing PCBs below 50 ppm are subject to regulation under TSCA. (See 40 CFR 761.61(a)(5)(i)(B)(2)(ii).). 40 CFR 761.3 provides information relative to disposal of PCBs-containing building materials, including definitions of PCBs bulk product wastes and PCBs remediation wastes. Further information is provided in a memorandum “PCB Bulk Product Waste Reinterpretation” from the Office of Resource Conservation and Recovery, EPA. Additionally, the disposal of PCBs waste is subject to California Code of Regulations (CCR) Title 22, Section Division 4.5, Chapter 12, Standards Applicable to Hazardous Waste Generators.

CONTROL MEASURE IMPLEMENTATION

CONTINUATION OF MRP 2.0 ACTIONS FOR LOAD REDUCTION CREDIT

All Permittees have continued to implement their PCBs in Building Materials control programs through the present date. During MRP 2.0, Permittees were credited with 247 g/yr PCBs load reduction as a result of implementing these programs. Permittees provided all required data on the implementation of these programs during MRP 2.0 with the Program’s Annual Report submitted in September 2022 (SMCWPPP 2022). This information has included the following data: (a) number of applicable structures that applied for a demolition permit during the reporting year, and (b) a running list of the applicable samples from structures that applied for a demolition permit since the start of the PCBs control protocol that had material(s) with PCBs at 50 ppm or greater, with the address, demolition date, and brief description of PCBs control method(s) used. **Attachment C** provides all the data gathered during MRP 2.0 to document implementation of this program. These data demonstrate that Permittees continue to implement their building demolition programs consistent with the load reduction credits that were received during MRP 2.0.

IMPLEMENTATION DURING MRP 3.0

Attachment C provides the countywide data compiled through FY 2025/26 to document ongoing implementation of this program in San Mateo County. Additional information on inspections conducted and hazardous waste manifests received are reported in Permittees Annual Reports for FY 2025/26. The data on implementation during MRP 3.0 are summarized in Table 7.1. The estimates for FY 2026/27 are based on the average annual implementation rates during the previous four years. The total estimated PCBs loads that have been or will be reduced in San Mateo County due to implementation of this program during MRP 3.0 (FY 2022/23 through FY 2026/27) are approximately **7.3 g/yr**. Note, this load reduction is not credited during MRP 3.0 because the full load reduction for this control measure was already received during MRP 2.0.

Table 7.1. Total estimated PCBs loads reduced during MRP 3.0 due to implementing the Building Demolition Protocols.

Term	Variable	Description	Value	Units
1	N	Estimated number of applicable structures demolished with PCBs concentrations ≥ 50 ppm countywide	5	Applicable structures with PCBs concentrations ≥ 50 ppm during MRP 3
2	M	Countywide average mass of PCBs per applicable structure with PCBs concentrations ≥ 50 ppm	0.91	kg/applicable structure during MRP 3
3	SW	Average fraction of PCBs that enters the MS4 due to demolition without controls	0.01	dimensionless fraction
4	E_f	Average fraction of PCBs prevented by controls from entering MS4 (i.e., assumed effectiveness of controls)	0.8	dimensionless fraction
Totals^a			7.3	Total estimated PCBs loads reduced per year during MRP 3 (g/yr) ^{a,b}
			36	Total estimated mass of PCBs (g) reduced over the 5-year permit term (g)

^a PCBs load reduced calculated using the following equation: Load of PCBs Reduced = $N \cdot M \cdot SW \cdot E_f$

^b Number of buildings for FY 26-27 were estimated by taking the average number of applicable structures demolished with PCBs concentrations ≥ 50 ppm per year during FY 22-23 through FY 25-26

SECTION 8 -MERCURY COLLECTION AND RECYCLING

This section describes the Program for Mercury Collection and Recycling that provides load reduction benefits for mercury, demonstrates controls measures implemented by Permittees during MRP 3.0 to date (i.e., through FY 2025/26) and anticipated during FY 2026/27, and includes all supporting data required to calculate the mercury loads reduced.

CONTROL MEASURE DESCRIPTION

Many types of devices and equipment (e.g., thermometers, switches, and fluorescent lamps) can contain mercury. When these devices are not adequately managed at their end-of-life, mercury can be released into the environment and become available to stormwater runoff. Control measures currently implemented by Permittees that address the potential for mercury releases include: 1) the support of policies and laws that reduce the mass of mercury in specific devices/equipment; and 2) the implementation of recycling programs that reduce the risk of mercury from being released at the end-of-life of these devices and equipment.

CONTROL MEASURE IMPLEMENTATION

CONTINUATION OF MRP 2.0 ACTIONS FOR LOAD REDUCTION CREDIT

Permittees have conducted mercury collection and recycling as described above since MRP 1.0 and even earlier. However, because this control measure was not a requirement under MRP 2.0, Permittees did not receive mercury load reduction credits for these actions during MRP 2.0. The actions implemented during MRP 3.0 to date are described below.

IMPLEMENTATION DURING MRP 3.0

Collection/Recycling of Mercury-Containing Products, Devices, and Equipment

San Mateo County municipalities participate in San Mateo County Health Department's Household Hazardous Waste (HHW) Program and Very Small Quantity Generator Business Collection (VSQG) Program and will continue to participate during FY 2026/27. The HHW Program offers residents the opportunity to drop-off mercury-containing devices and equipment and other hazardous wastes at designated drop-off points or drop-off events free of charge. The VSQG Program provides an inexpensive hazardous waste disposal option to eligible businesses, non-profits, and other government agencies that generate less than 100 kilograms of waste per month. It operates by appointment only and charges a fee to cover the cost of transportation and disposal. Many San Mateo County municipal agencies promote the availability of the HHW Program and VSQG Program on their agency websites. The estimated mass of mercury collected during MRP 3.0 (i.e., FY 2022/23 through FY 2026/27) via these programs is shown in Table 8-1. The estimates for FY 2026/27 are based on the average annual implementation rates during the previous four years. Mercury loads avoided are calculated assuming that 4.8% of the mass collected is an avoided stormwater load (BASMAA 2022).

During MRP 3.0, the Program estimates that San Mateo County mercury collection and recycling programs will have collected approximately:

- 38,000 linear feet of fluorescent lamps;
- 20,000 compact fluorescent lamps;

- 85 Thermostats;
- 218 Mercury Thermometers;
- 13 mercury switches
- 259 High-intensity discharge lamps
- 6.4 kg of elemental mercury

This collection equates to approximately 7.3 kg of mercury collected through FY 2025/26. Using the average values of mercury collected during the first four years of MRP 3.0 to estimate the amount for FY 2026/27, the total mercury loads avoided during MRP 3.0 is 359 g/yr.

Table 8.1. Estimated mercury mass collected via the San Mateo County Health Department's Household Hazardous Waste (HHW) and Very Small Quantity Generator Business Collection (VSQG) programs.

Mercury Containing Device	FY 2022/23		FY 2023/24		FY 2024/25		FY 2025/26		FY 2026/27 (Projected)	
	Total Amount of Devices Collected	Estimated Mass of Mercury Collected (kg)	Total Amount of Devices Collected	Estimated Mass of Mercury Collected (kg)	Total Amount of Devices Collected	Estimated Mass of Mercury Collected (kg)	Total Amount of Devices Collected	Estimated Mass of Mercury Collected (kg)	Total Amount of Devices Collected	Estimated Mass of Mercury Collected (kg)
Fluorescent Lamps (linear ft) ^{1,2}	49,759	0.1	51,558	0.11	32,784	0.07	20,749	0.04	38712	0.08
CFLs (number of) ³	9,937	0.04	3,942	0.02	4,289	0.02	2,158	0.01	5082	0.02
Thermostats (number of) ⁴	25	0.1	22	0.09	25	0.1	13	0.05	21	0.09
Thermometers (number of) ⁵	19	0.01	120	0.07	63	0.04	16	0.01	55	0.03
Switches (number of) ⁶	7	0.02	3	0.01	3	0.001	0	0	3	0.001
High-Intensity Discharge (HID) Lamps ⁷	0	--	0	--	259	0.0001	0	--	65	0.00003
Elemental Mercury (kg)	0	--	0	--	--	0.45	--	5.9	--	0
Total Mass of Mercury Collected (kg)	--	0.3	--	0.3	--	0.7	--	6.0	--	0.2
Total Mass of Mercury Collected During MRP 3.0 To Date (kg)	7.3									
Estimated Total Mass of Mercury Collected During MRP 3.0 (kg)	7.5									

^a Fluorescent tube lamps are assumed to be four feet in length each.

^b The average mercury content for a four-foot linear fluorescent lamp is 8.3 milligrams (mg). This is equal to 2.075 mg per linear foot. Source: NEMA 2005. Fluorescent and Other Mercury-Containing Lamps and the Environment: Mercury Use, Environmental Benefits, Disposal Requirements. National Electrical Manufacturers Association. March 2005. 14p.

^c The National Electrical Manufacturers Association (NEMA) announced that under the new voluntary commitment, effective October 2010, participating manufacturers will cap the total mercury content in CFLs that are under 25 watts at 4 mg per unit, and CFLs that use 25 to 40 watts of electricity will be capped at 5 mg per unit. Each CFL recycled is assumed to have an average mass of 4.5 mg mercury. New CFLs are also assumed to have 4.5 mg mercury on average. Source: NEMA 2010. NEMA Lamp Companies Agree to Reduction in CFL Mercury Content Cap. Available at <https://web.archive.org/web/20101007124320/http://www.nema.org/media/pr/20101004a.cfm>. Accessed April 11, 2012.

^d The amount of mercury in a thermostat is determined by the number of ampoules. There are generally one or two ampoules per thermostat (average is 1.4) and each ampoule contains an average of 2.8 grams (g) of mercury. Therefore, each thermostat recycled is assumed to contain approximately 4.0 g of mercury. Source: TRC 2010. Thermostat Recycling Corporation's Annual Report for California. Prepared for the State of California's Office of Pollution Prevention and Green Technology, Department of Toxic Substances Control, 3/31/2010.

^e USEPA reports that glass mercury fever thermometers contain about 0.61 g of mercury. Source: USEPA 2026. Thermometers. Available at <https://www.epa.gov/mercury/mercury-thermometers>. Accessed August 27, 2026.

^f The Recycling Corporation reports that one mercury switch contains 2.87 g (0.00287 kg) of mercury. Source: TRC 2010. Thermostat Recycling Corporation's Annual Report for California. Prepared by the Thermostat Recycling Corporation. Prepared for the State of California's Office of Pollution Prevention and Green Technology, Department of Toxic Substances Control. March 31, 2010.

^g The average content of a HID bulb is 0.5 mg of mercury. Source NEMA 2004. Opposition to Ban on Mercury Containing Headlamps, <http://www.nema.org/Policy/Environmental-Stewardship/Lamps/Documents/HID%20Headlamps%2010%2004.pdf>.

^h Mercury loads avoided are calculated assuming that 4.8% of the mass collected is an avoided stormwater load (BASMAA 2022).

ⁱ To calculate the mass of mercury collected during FY 2025/26 by the HHW Program, SMCWPPP used a spreadsheet entitled "Estimated Mass of Mercury Collected Calculator – 8/18/26." The estimated mass of mercury collected is based on the total amount of mercury-containing devices and equipment collected and calculated using the best available information from manufacturers and trade organizations regarding the amount of mercury in devices and equipment of interest. The estimated mass of mercury collected by the HHW Program during FY 2025/26 and MRP 3.0 is provided in this table.

SECTION 9 -MERCURY AND PCBs LOADS REDUCED DURING MRP 3.0

SMCWPPP Permittees began implementing and accounting for PCBs and mercury control measures with the adoption of the PCBs and Mercury TMDLs. Control measure implementation throughout MRP 3.0 primarily focuses on: 1) conducting source investigations of OI land use areas that will likely lead to referrals to the Water Board for further investigation and abatement, and/or identify properties contributing moderate PCBs to the MS4 for abatement; 2) implementing O&M actions in OI land use areas and other areas with elevated PCBs or mercury; 3) implementing GI/LID and other treatment controls on both public and private property, and in the public ROW; 4) continuing to implement a protocol to manage PCBs in building materials during demolition, and 5) continuing to collect and recycle mercury-containing products. This section provides the annual PCBs and mercury load reductions achieved due to implementation of these control measures during MRP 3.0 to date and anticipated through the end of the permit (i.e. FY 2026/27).

APPROACH TO REPORTING PCBs AND MERCURY LOADS REDUCED

The data needed to calculate the PCBs and mercury loads reduced for each control measure are provided in Sections 2-8 of this report. Where applicable, these data include the total acres (and associated land-uses) addressed by each type of control measure. The methods used to calculate the loads reduced are consistent with the methodologies and data collection programs that were developed by BASMAA member agencies in consultation with the Regional Water Board, and in accordance with MRP Provisions C.11.B.iii(1) and C.12.B.iii(1). These methods were fully described in SCLRA (BASMAA 2022), which was approved by the Water Board's Executive Officer in Spring 2022 for use by SMCWPPP Permittees during MRP 3.0. Note, the method to calculate storm drain line cleanouts has been updated since the BASMAA 2022 document was developed. The updated method is used in this report, and is described in detail in the updated SCLRA, which is included with the SMCWPPP 2026 Annual Report as Appendix 11/12b (BASMAA 2026). Also new to the updated SCLRA report is the development of a mercury source property yield, which was not included in BASMAA 2022. This report uses the new mercury source property yield.

Note: Due to the timing of MRP reporting, not all GI facilities constructed during the current reporting year (FY 2025/26) or planned for completion during FY 2026/27 are reported in this document. As data becomes available, these control measures will be fully reported in future Annual Reports.

PCBs LOADS REDUCED IN MRP 3.0

Total PCBs loads reduced by control measure type in MRP 3.0 to date (i.e. FY 2021/22 through FY 2025/26) and estimated for FY 2026/27 are presented in Table 9.1. San Mateo County Permittees have achieved a total PCBs load reduction of **100 g/yr** during MRP 3.0 to date, and are expected to achieve an additional **149 g/yr** in FY 2026/27, bringing the total to **249 g/yr** by the end of the permit term. Of these totals, **82 g/yr** of PCBs load reduction is estimated to occur in OI land use areas, as shown in Table 9.2, demonstrating that the SMCWPPP Permittees will meet the MRP 3.0 C.12.c target of **81 g/yr** of PCBs reduced in OI land use areas.

In addition, if we factor in the referral of the high PCBs source properties that Permittees are planning to submit to the Water Board in FY 2026/27, which are all located in old industrial land areas, the load reduction achieved during MRP 3 in old industrial land areas increases to over **200 g/yr**, and will likely

increase further as additional high PCBs Source Properties and MPCPs are identified over the next fiscal year and referred or abated.

All supporting data and information necessary to substantiate the load reduction estimates are provided in Sections 2 through 8 of this report. These estimates are based on the best available data at the time of writing this report, and may be updated in the future if needed.

Table 9.1. PCBs Load Reductions in MRP 3.0

Program	Implementation	PCBs Load Reduction (g/yr)						
		FY 21-22 ^a	FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27 (Expected)	Cumulative Load Reduction
Source Area Identification and Abatement	Source Property Referrals (During MRP 3)	n/a	--	--	--	--	134	134
Control Measures in Old Industrial Areas (OI areas)	Parcel-Based GI/LID Redevelopment	20.2	8.0	7.0	7.5	4.9	2.4	50
	Sustainable Streets	0.04	0.6	0	0.05	0	0	0.6
	Regional Stormwater Capture Facilities	--	0.3	--	--	--	--	0.3
	Inlet-Based Stormwater Treatment Devices	0.01	0.1	3.2	5.0	1.4	--	9.6
	High Flow-Capacity Stormwater Treatment Devices	--	0.2	0.8	0	0.1	--	1.1
	MS4 Line Cleanouts	n/a	--	--	--	--	3.2	3.2
	MS4 Channel De-Silting	n/a			1.2			1.2
	Moderate PCBs Controls	n/a	--	--	0.5	4.9	10	15
Implementing GSI to Reduce Mercury and PCBs Loads (non-OI areas)	Parcel-Based GI/LID Redevelopment	2.1	1.9	1.0	1.4	1.1	0	7.4
	Sustainable Streets	0.1	0.1	0	0	0.1	0	0.3
	Regional Stormwater Capture Facilities	--	16	--	--	--	--	16
Other Stormwater Treatment (non-OI areas)	Inlet-Based Stormwater Treatment Devices	0.3	0.8	1.2	3.5	1.1	--	6.8
	High Flow-Capacity Stormwater Treatment Devices	--	0.6	0.8	0	2.2	--	3.5
Total		23	28	14	19	16	149	249

Table 9.2. MRP 3.0 PCBs Loads Reduced in OI Acres by Control Measure Type

Control Measure	PCBs Load Reduction (g/yr)
Parcel-Based GI/LID Redevelopment	50
Sustainable Streets	0.6
Regional Stormwater Capture Facilities	0.3
Inlet-Based Stormwater Treatment Devices	9.6
High Flow-Capacity Stormwater Treatment Devices	1.1
MS4 Line Cleanouts	3.2
MS4 Channel De-Silting	1.2
Moderate PCBs Controls	15.5
Total	81.6

MERCURY LOADS REDUCED

Total mercury loads reduced by control measure type in MRP 3.0 to date (i.e. FY 2021/22 through FY 2025/26) and estimated for FY 2026/27 are presented in Table 9.3. SMCWPPP Permittees have achieved a total mercury load reduction of **435 g/yr** during MRP 3.0 to date, and anticipate an additional **16 g/yr** in FY 2026/27, bringing the total to **452 g/yr** by the end of the permit term. Of these totals, **15 g/yr** of mercury load reduction is estimated to occur in OI land use areas, as shown in Table 9.4. Based on this information, SMCWPPP Permittees have not yet met the MRP 3.0 C.11.c target of 19 g/yr of mercury reduced in OI land use areas. However, if we factor in the referral of the high mercury source properties that have been identified in FY 2025/26, which are all located in old industrial land areas, the load reduction achieved during MRP3 in old industrial land areas increases to **17 g/yr**, and will likely increase further as additional high mercury source properties and MPCPs are identified over the next fiscal year, and referred or abated.

All supporting data and information necessary to substantiate the load reduction estimates are provided in Sections 2 through 8 of this report. These estimates are based on the best available data at the time of writing this report, and may be updated in the future if needed.

Table 9.3. Mercury Load Reductions in MRP 3.0

Program	Implementation	Mercury Load Reduction (g/yr)						
		FY 21-22 ^a	FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27 (Expected)	Cumulative Load Reduction
Source Area Identification and Abatement	Source Property Referrals (During MRP 3)	n/a	--	--	--	--	1.8	1.8
Control Measures in Old Industrial Areas (OI areas)	Parcel-Based GI/LID Redevelopment	3.8	1.5	1.3	1.4	0.9	0.5	9.5
	Sustainable Streets	0.008	0.1	0	0.01	0	0	0.1
	Inlet-Based Stormwater Treatment Devices	0.002	0.02	0.6	1.0	0.3	--	2.0
	High Flow-Capacity Stormwater Treatment Devices	--	0.03	0.2	0	0	--	0.2
	MS4 Line Cleanouts	n/a	--	--	--	--	3.2	3.2
Implementing GSI to Reduce Mercury and PCBs Loads (non-OI areas)	Parcel-Based GI/LID Redevelopment	3.7	4.9	18.6	7.3	3.0	0.1	38
	Sustainable Streets	0.2	0.3	0.1	0.004	0.5	0.1	1.2
Other Stormwater Treatment (non-OI areas)	Inlet-Based Stormwater Treatment Devices	0.6	2.0	3.7	8.3	4.9	--	20
	High Flow-Capacity Stormwater Treatment Devices	--	2.3	6.0	0.001	8.8	--	17
Mercury Collection & Recycling	Household Hazardous Waste Collection	n/a	13	14	32	289	11	359
Total		8.4	24	45	51	307	16	452

Table 9.4. MRP 3.0 Mercury Loads Reduced in OI Acres by Control Measure Type

Control Measure	Mercury Load Reduction (g/yr)
Parcel-Based GI/LID Redevelopment	9.5
Sustainable Streets	0.1
Inlet-Based Stormwater Treatment Devices	2.0
High Flow-Capacity Stormwater Treatment Devices	0.2
MS4 Line Cleanouts	3.2
Total	15.0

SECTION 10 - REFERENCES

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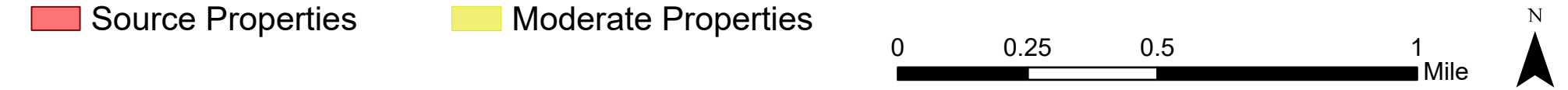
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ATTACHMENT A

**MAPS OF PCBs SOURCE PROPERTIES REFERRED TO THE WATER BOARD
AND MPCPs IDENTIFIED DURING MRP 3.0 TO DATE AND ANTICIPATED
THROUGH THE END OF MRP 3.0**



Figure A-1: PCBs Source Properties Referred to the Water Board and MPCPs Identified during MRP 3.0 to Date and Anticipated through the End of MRP 3.0



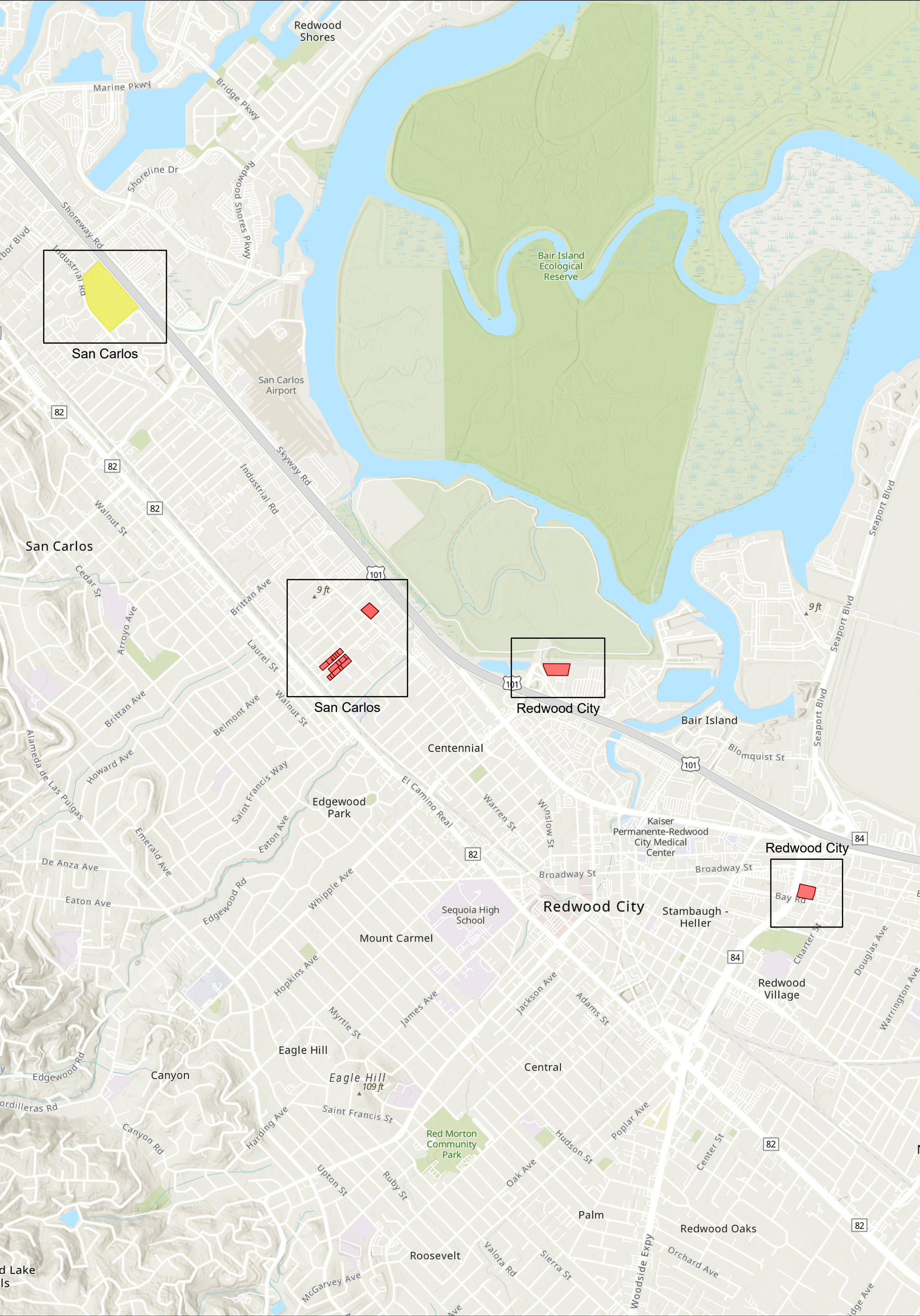
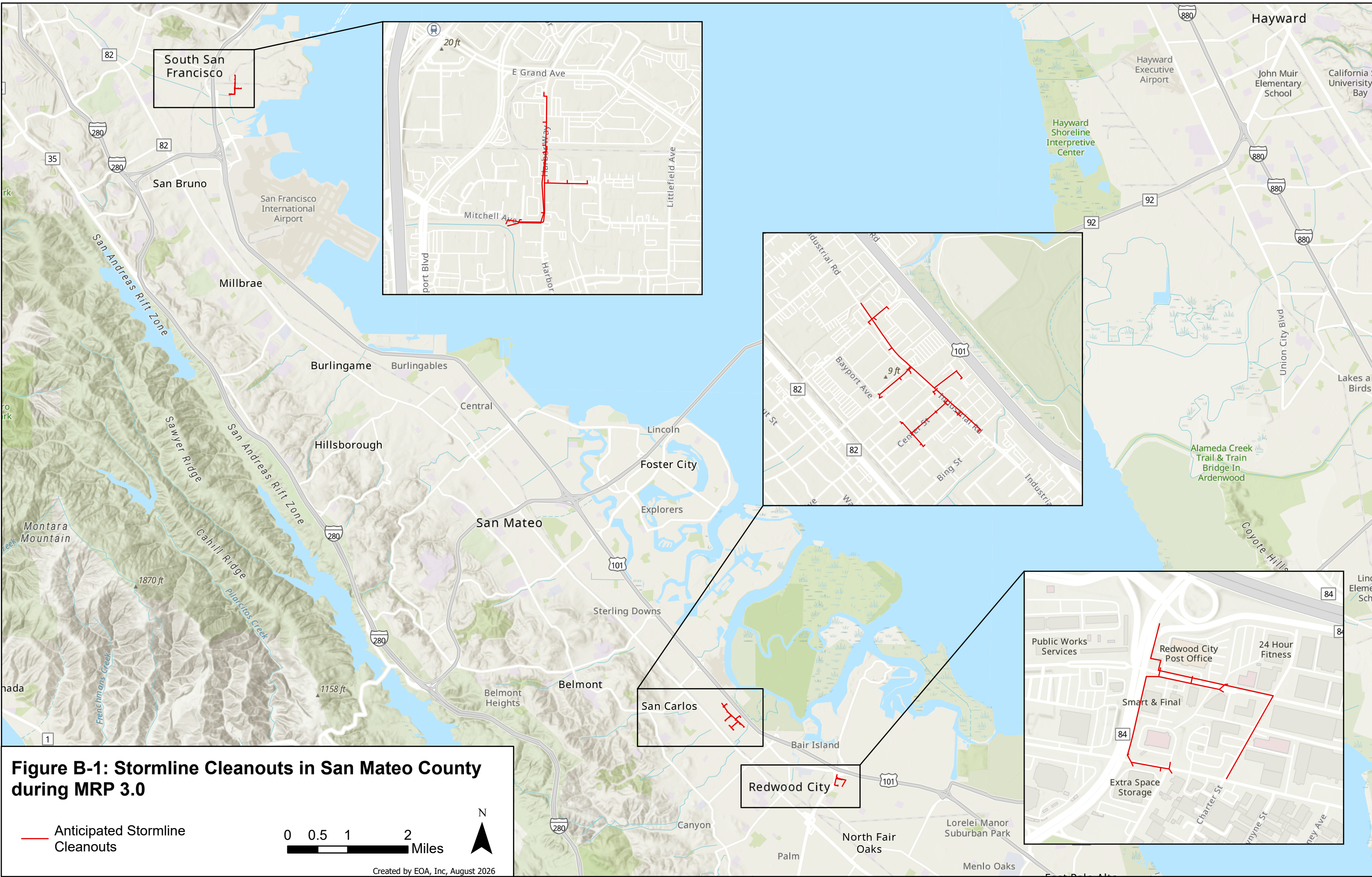


Figure A-2: PCBs Source Properties Referred to the Water Board and MPCPs Identified during MRP 3.0 to Date and Anticipated through the End of MRP 3.0



ATTACHMENT B

MAPS OF STORMLINE CLEANOUTS, GREEN INFRASTRUCTURE, AND OTHER STORMWATER TREATMENT CONTROLS BUILT/INSTALLED IN SAN MATEO COUNTY THROUGH FY 2025/26



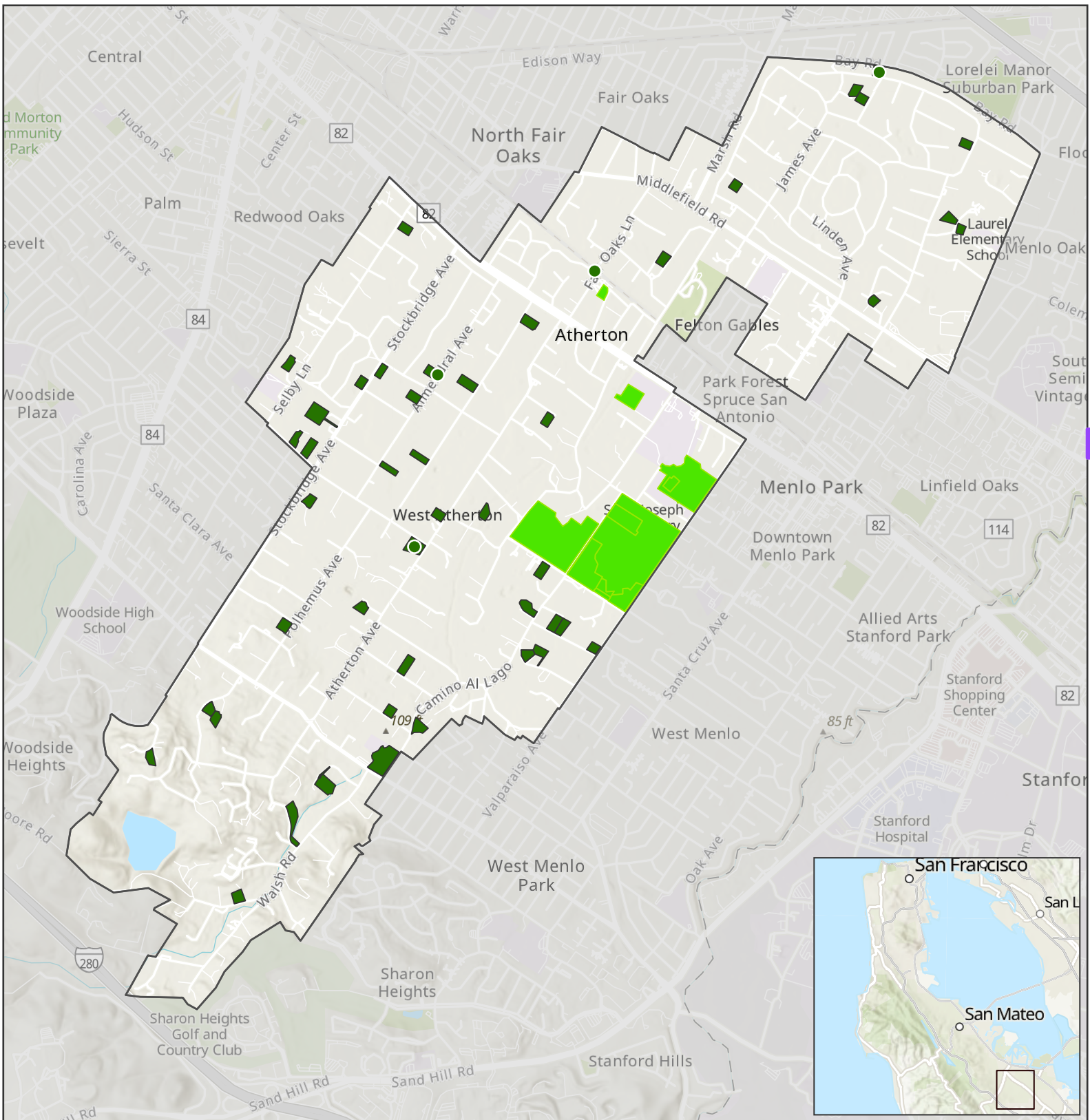


Figure B-2: GI/LID and Other Stormwater Treatment Systems in Atherton

- Pre-MRP 3.0 Sustainable Streets
- MRP 3.0 Sustainable Streets
- Expected Sustainable Streets
- Pre-MRP 3.0 GI/LID Projects
- MRP 3.0 GI/LID Projects
- Expected GI/LID Projects
- Pre-MRP 3.0 High-Flow Capacity Systems
- MRP 3.0 High-Flow Capacity Systems
- Pre-MRP 3.0 Catch Basin Inserts
- MRP 3.0 Catch Basin Inserts
- City Limits

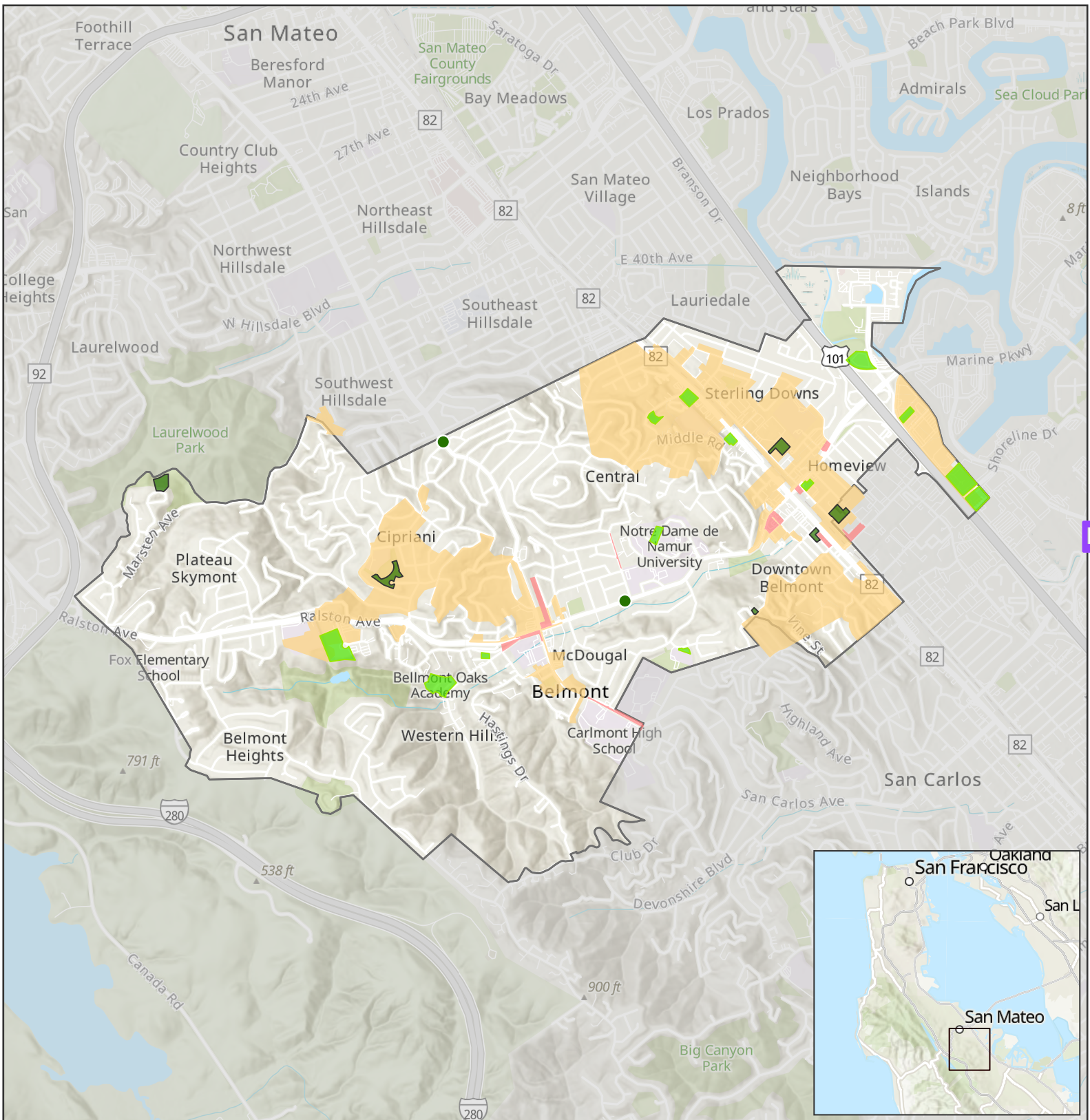


Figure B-3: GI/LID and Other Stormwater Treatment Systems in Belmont

- Pre-MRP 3.0 Sustainable Streets
- MRP 3.0 Sustainable Streets
- Expected Sustainable Streets
- Pre-MRP 3.0 GI/LID Projects
- MRP 3.0 GI/LID Projects
- Expected GI/LID Projects
- Pre-MRP 3.0 High-Flow Capacity Systems
- MRP 3.0 High-Flow Capacity Systems
- Pre-MRP 3.0 Catch Basin Inserts
- MRP 3.0 Catch Basin Inserts
- City Limits

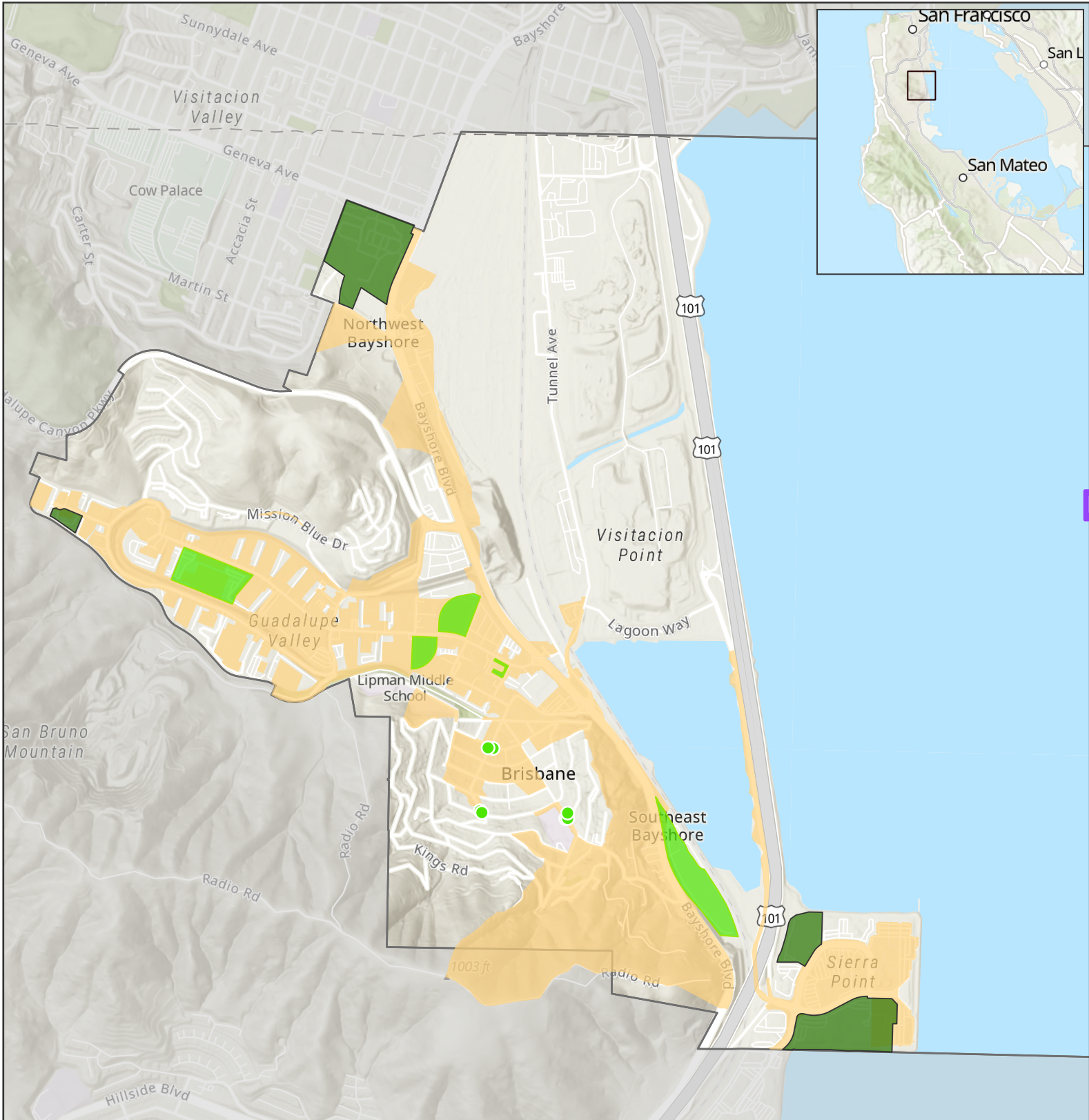


Figure B-4: GI/LID and Other Stormwater Treatment Systems in Brisbane

- Pre-MRP 3.0 Sustainable Streets
- MRP 3.0 Sustainable Streets
- Expected Sustainable Streets
- Pre-MRP 3.0 GI/LID Projects
- MRP 3.0 GI/LID Projects
- Expected GI/LID Projects
- Pre-MRP 3.0 High-Flow Capacity Systems
- MRP 3.0 High-Flow Capacity Systems
- Pre-MRP 3.0 Catch Basin Inserts
- MRP 3.0 Catch Basin Inserts
- City Limits

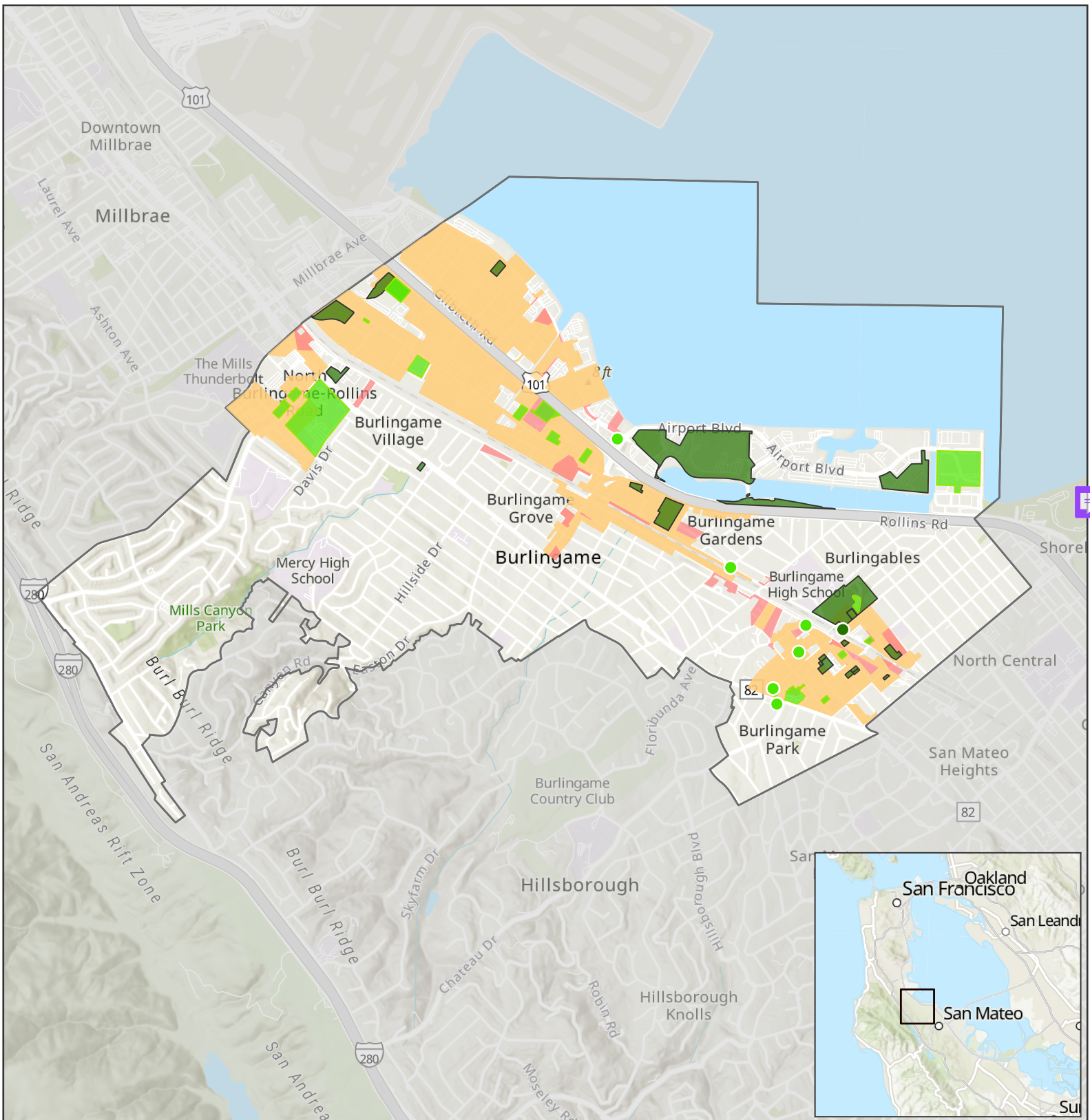


Figure B-5: GI/LID and Other Stormwater Treatment Systems in Burlingame

● Pre-MRP 3.0 Sustainable Streets	 Pre-MRP 3.0 High-Flow Capacity Systems
● MRP 3.0 Sustainable Streets	 MRP 3.0 High-Flow Capacity Systems
● Expected Sustainable Streets	 Pre-MRP 3.0 Catch Basin Inserts
 Pre-MRP 3.0 GI/LID Projects	 MRP 3.0 Catch Basin Inserts
 MRP 3.0 GI/LID Projects	 City Limits
 Expected GI/LID Projects	

Mile

0 0.5 1

Map Created by EOA, Inc., August 2026

Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI

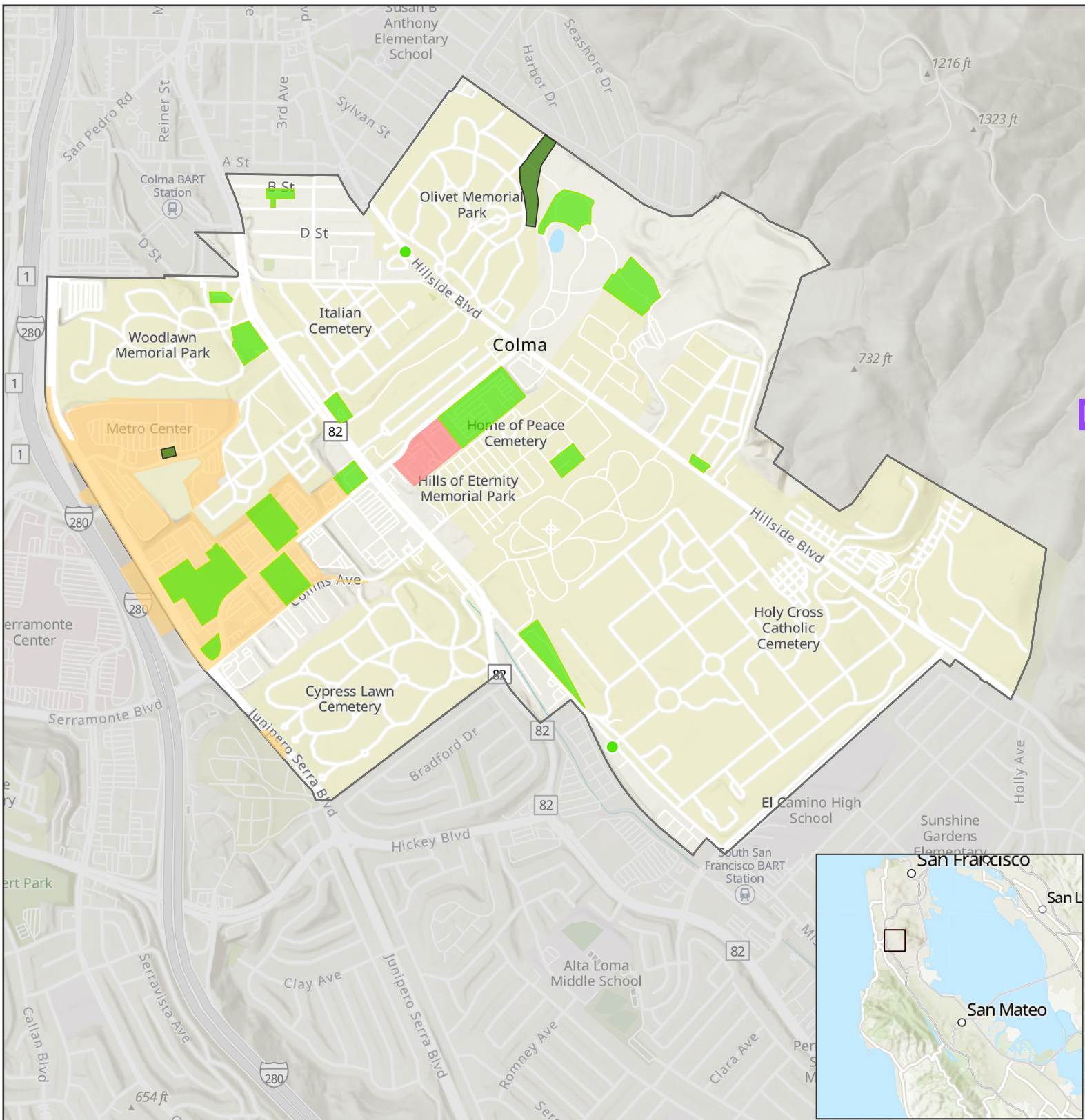
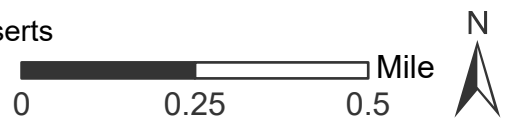


Figure B-6: GI/LID and Other Stormwater Treatment Systems in Colma

- Pre-MRP 3.0 Sustainable Streets
- MRP 3.0 Sustainable Streets
- Expected Sustainable Streets
- Pre-MRP 3.0 GI/LID Projects
- MRP 3.0 GI/LID Projects
- Expected GI/LID Projects
- Pre-MRP 3.0 High-Flow Capacity Systems
- MRP 3.0 High-Flow Capacity Systems
- Pre-MRP 3.0 Catch Basin Inserts
- MRP 3.0 Catch Basin Inserts
- Town Limits



Map Created by EOA, Inc., August 2026
Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI

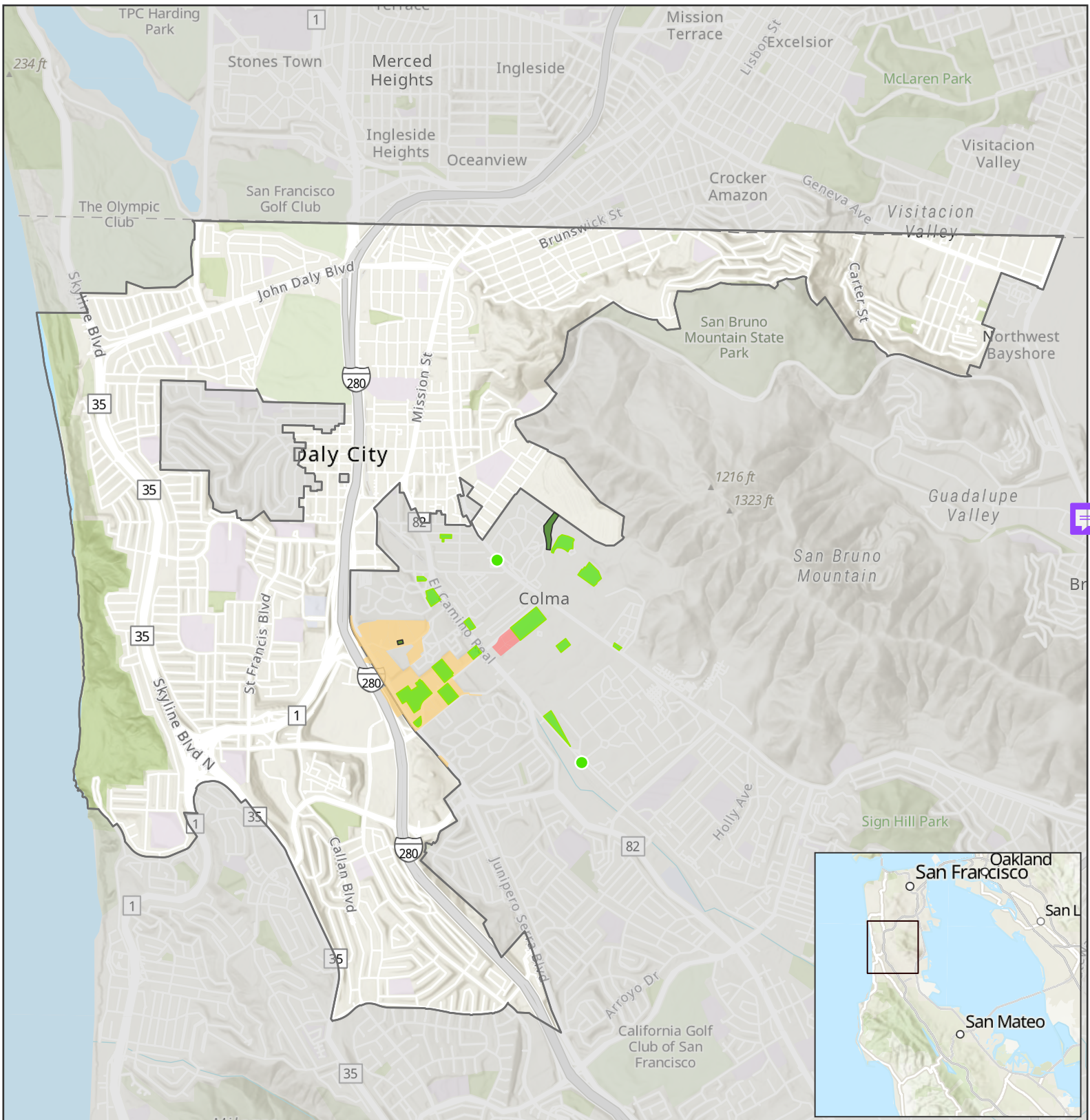


Figure B-7: GI/LID and Other Stormwater Treatment Systems in Daly City

● Pre-MRP 3.0 Sustainable Streets	■ Pre-MRP 3.0 High-Flow Capacity Systems
● MRP 3.0 Sustainable Streets	■ MRP 3.0 High-Flow Capacity Systems
● Expected Sustainable Streets	■ Pre-MRP 3.0 Catch Basin Inserts
■ Pre-MRP 3.0 GI/LID Projects	■ MRP 3.0 Catch Basin Inserts
■ MRP 3.0 GI/LID Projects	□ City Limits
■ Expected GI/LID Projects	

0 0.5 1 Mile

Map Created by EOA, Inc., August 2026

Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI

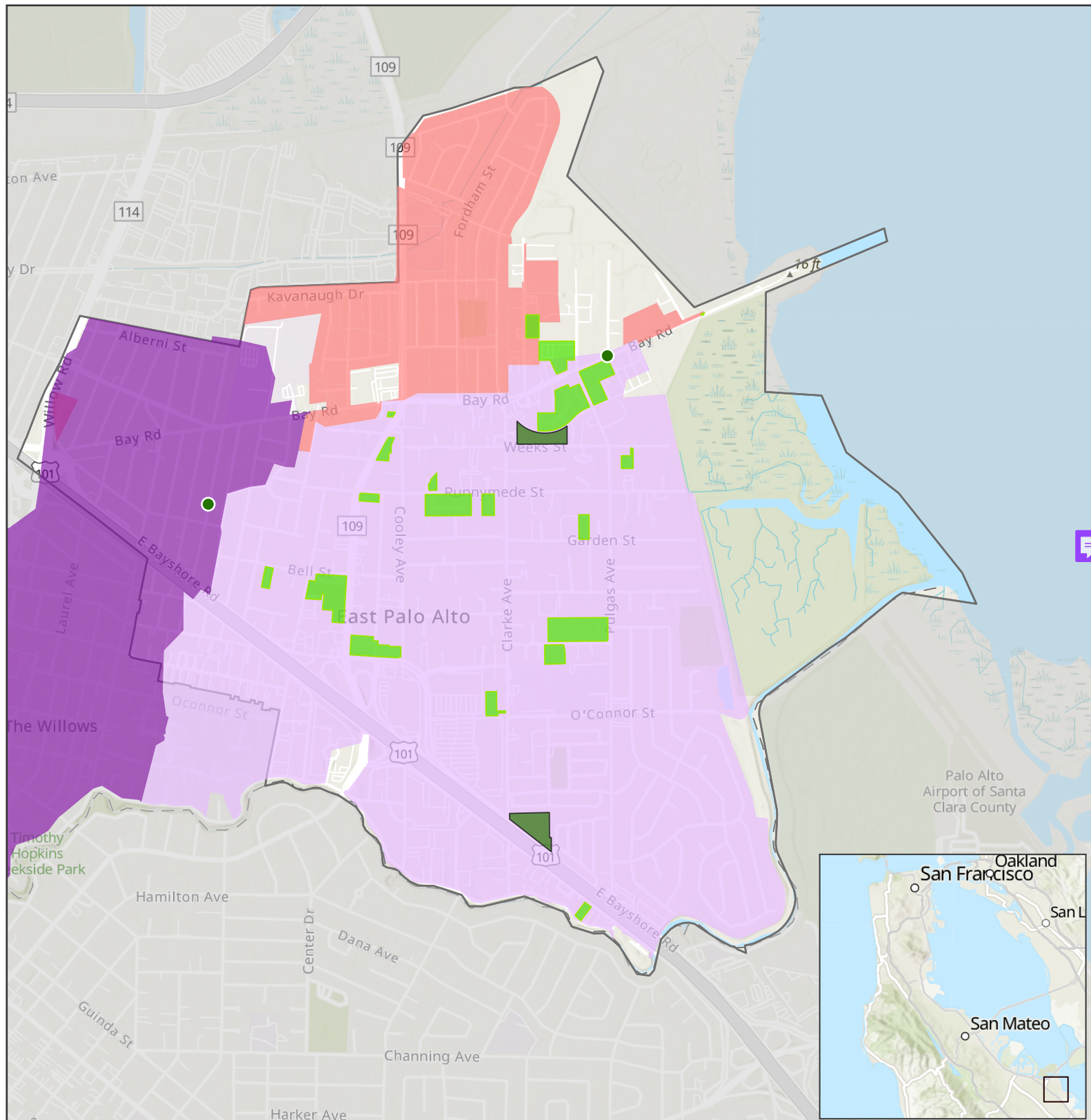


Figure B-8: GI/LID and Other Stormwater Treatment Systems in East Palo Alto

- Pre-MRP 3.0 Sustainable Streets
- MRP 3.0 Sustainable Streets
- Expected Sustainable Streets
- Pre-MRP 3.0 GI/LID Projects
- MRP 3.0 GI/LID Projects
- Expected GI/LID Projects
- Pre-MRP 3.0 High-Flow Capacity Systems
- MRP 3.0 High-Flow Capacity Systems
- Pre-MRP 3.0 Catch Basin Inserts
- MRP 3.0 Catch Basin Inserts
- City Limits

0 0.25 0.5 Mile



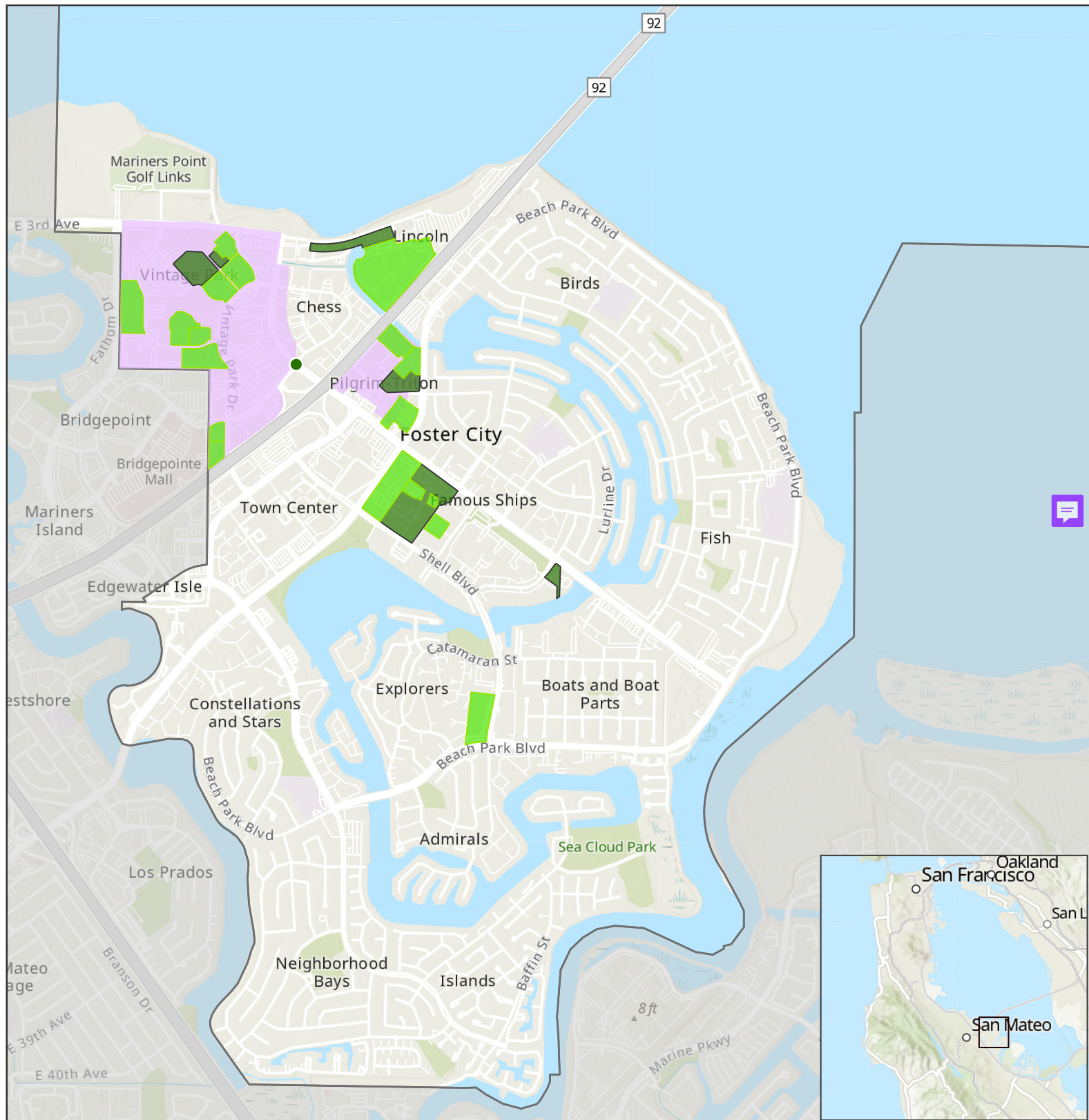
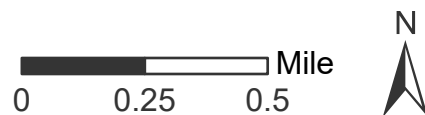


Figure B-9: GI/LID and Other Stormwater Treatment Systems in Foster City

- Pre-MRP 3.0 Sustainable Streets
- MRP 3.0 Sustainable Streets
- Expected Sustainable Streets
- Pre-MRP 3.0 GI/LID Projects
- MRP 3.0 GI/LID Projects
- Expected GI/LID Projects
- Pre-MRP 3.0 High-Flow Capacity Systems
- MRP 3.0 High-Flow Capacity Systems
- Pre-MRP 3.0 Catch Basin Inserts
- MRP 3.0 Catch Basin Inserts
- City Limits



Map Created by EOA, Inc., August 2026
Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI

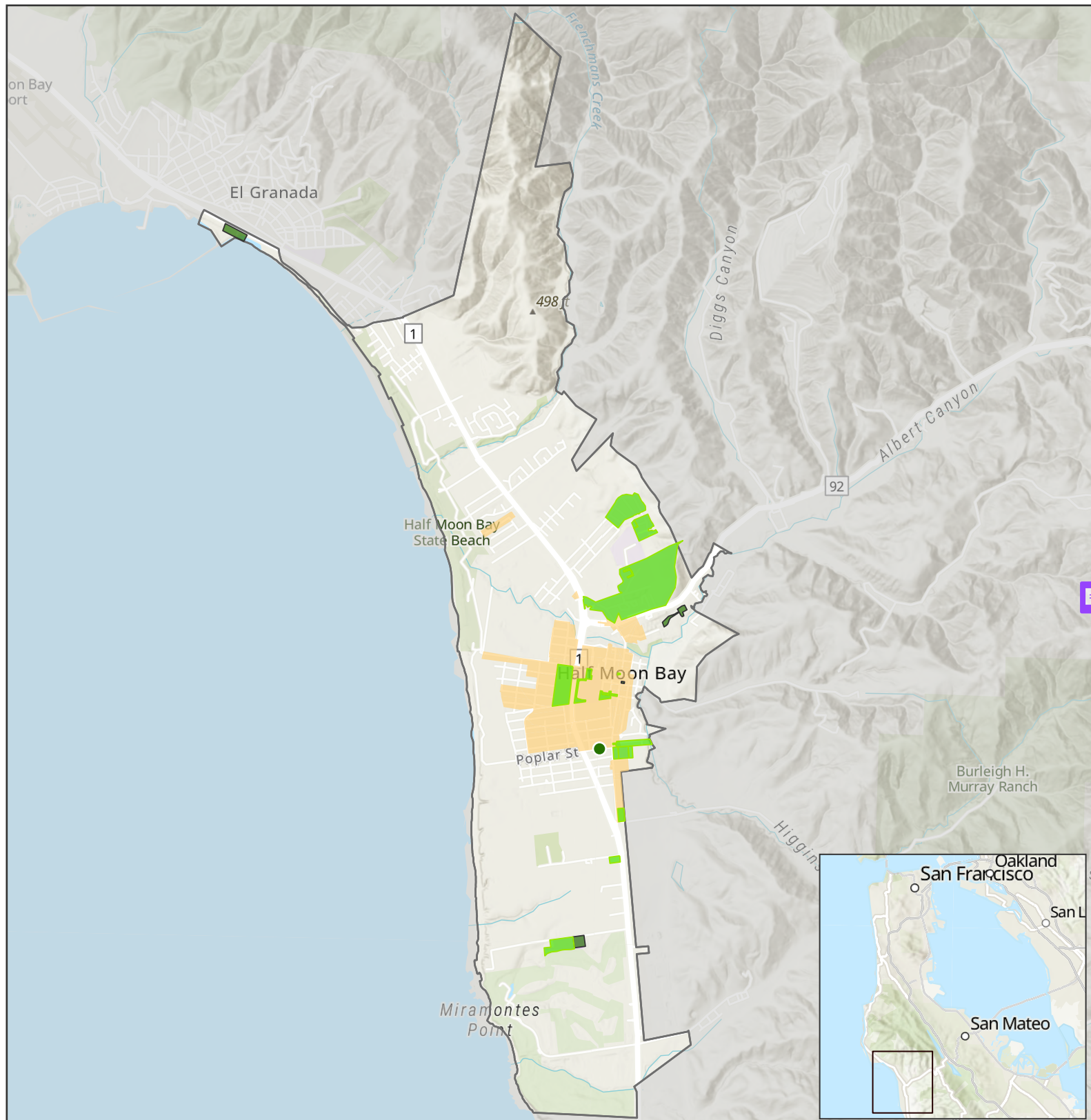


Figure B-10: GI/LID and Other Stormwater Treatment Systems in Half Moon Bay

- | | |
|-----------------------------------|--|
| ● Pre-MRP 3.0 Sustainable Streets | ■ Pre-MRP 3.0 High-Flow Capacity Systems |
| ● MRP 3.0 Sustainable Streets | ■ MRP 3.0 High-Flow Capacity Systems |
| ● Expected Sustainable Streets | ■ Pre-MRP 3.0 Catch Basin Inserts |
| ■ Pre-MRP 3.0 GI/LID Projects | ■ MRP 3.0 Catch Basin Inserts |
| ■ MRP 3.0 GI/LID Projects | □ Town Limits |
| ■ Expected GI/LID Projects | |

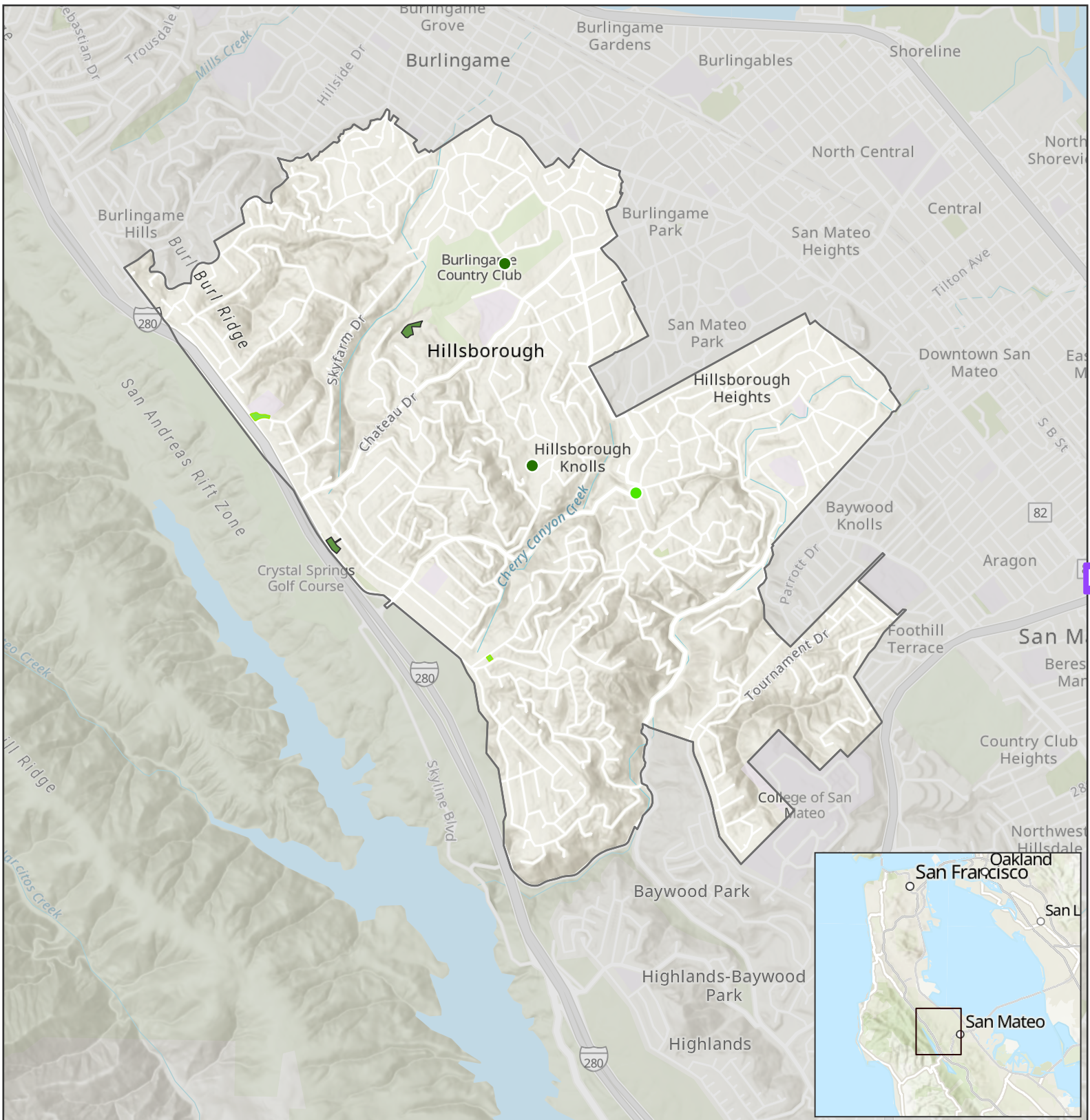


Figure B-11: GI/LID and Other Stormwater Treatment Systems in Hillsborough

● Pre-MRP 3.0 Sustainable Streets	 Pre-MRP 3.0 High-Flow Capacity Systems
● MRP 3.0 Sustainable Streets	 MRP 3.0 High-Flow Capacity Systems
● Expected Sustainable Streets	 Pre-MRP 3.0 Catch Basin Inserts
 Pre-MRP 3.0 GI/LID Projects	 MRP 3.0 Catch Basin Inserts
 MRP 3.0 GI/LID Projects	 Town Limits
 Expected GI/LID Projects	

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Map Created by EOA, Inc., August 2026

Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI



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Map Created by EOA, Inc., August 2026
Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI

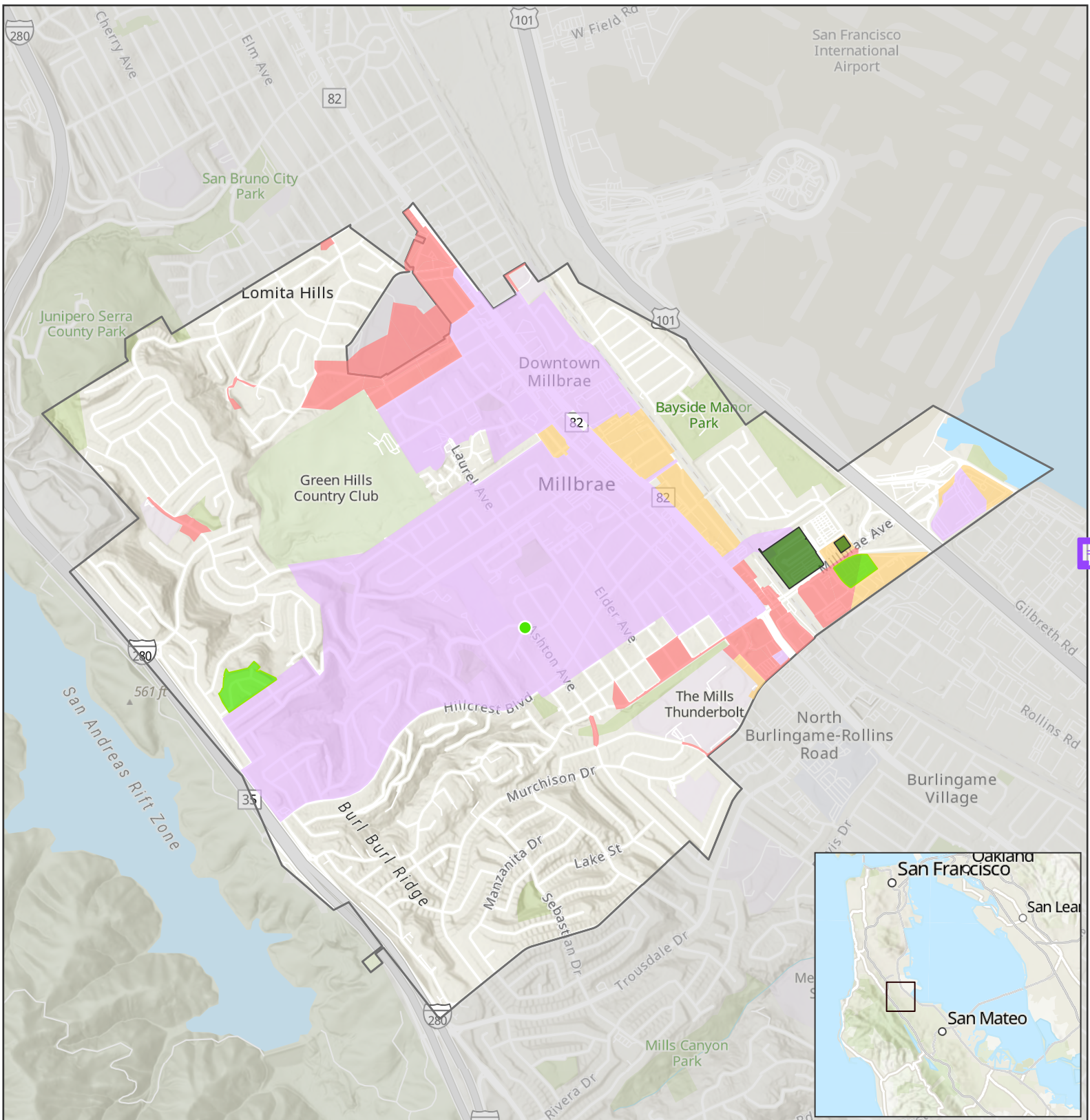


Figure B-13: GI/LID and Other Stormwater Treatment Systems in Millbrae

- Pre-MRP 3.0 Sustainable Streets
- MRP 3.0 Sustainable Streets
- Expected Sustainable Streets
- Pre-MRP 3.0 GI/LID Projects
- MRP 3.0 GI/LID Projects
- Expected GI/LID Projects

- Pre-MRP 3.0 High-Flow Capacity Systems
- MRP 3.0 High-Flow Capacity Systems
- Pre-MRP 3.0 Catch Basin Inserts
- MRP 3.0 Catch Basin Inserts
- City Limits

Mile

0 0.25 0.5

N

Map Created by EOA, Inc., August 2026

Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI

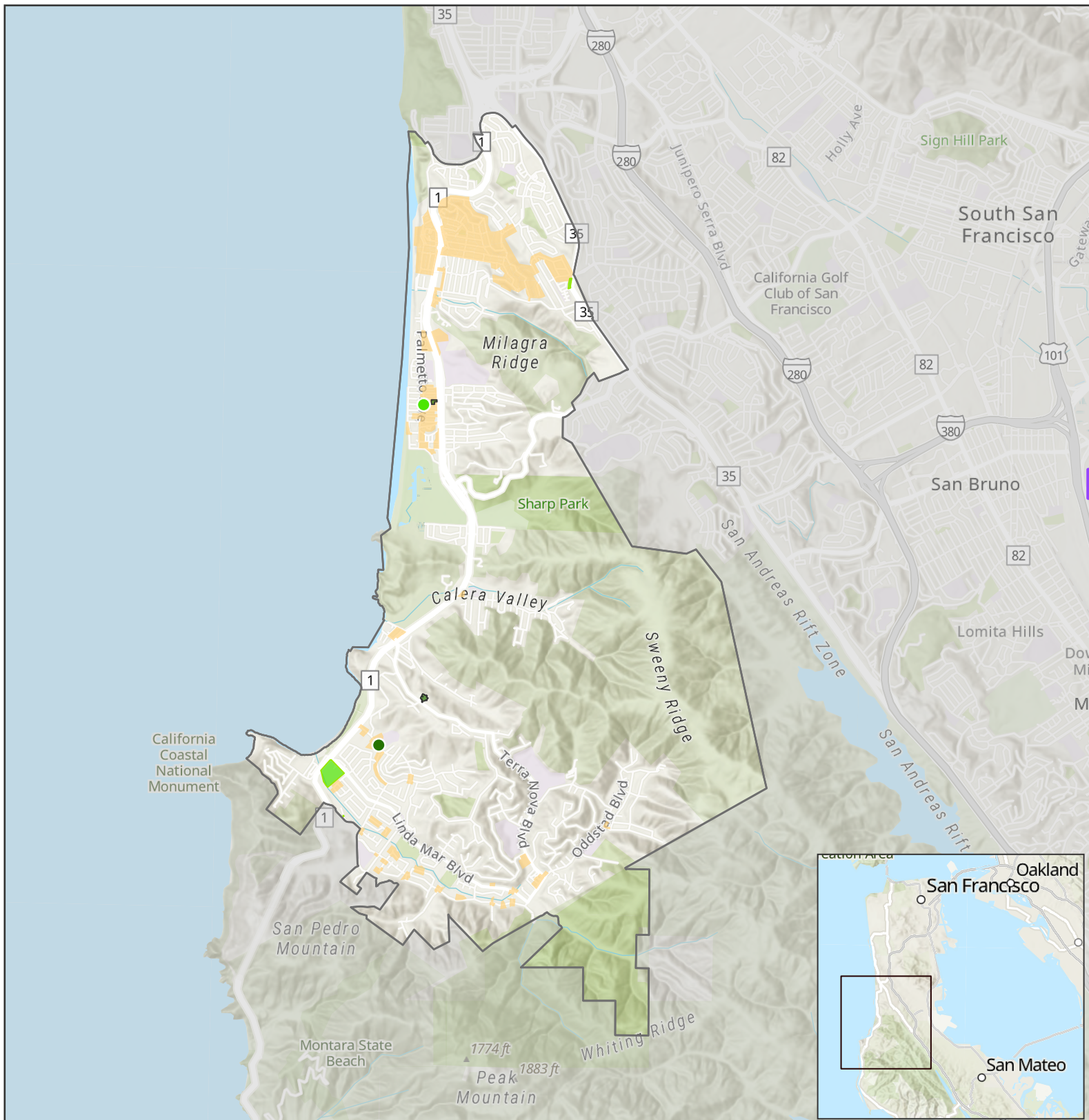
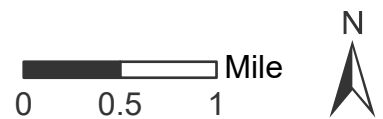
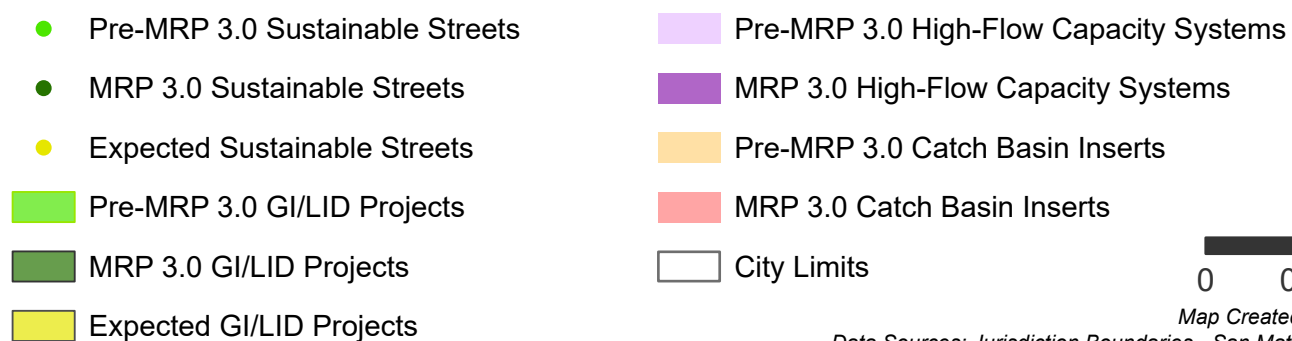


Figure B-14: GI/LID and Other Stormwater Treatment Systems in Pacifica



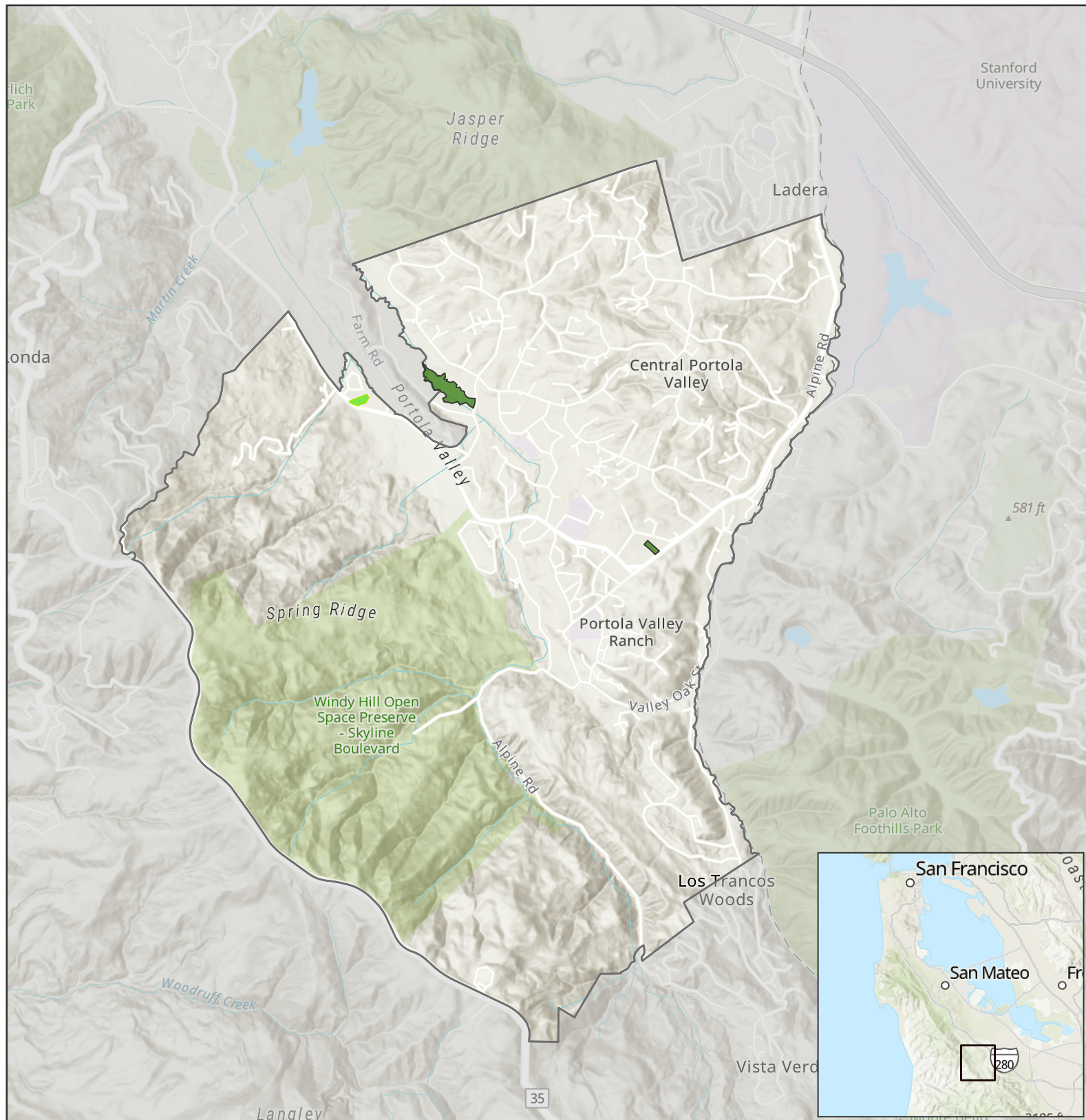
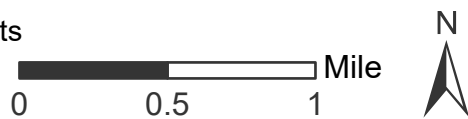


Figure B-15: GI/LID and Other Stormwater Treatment Systems in Portola Valley

- | | |
|-----------------------------------|--|
| ● Pre-MRP 3.0 Sustainable Streets | ■ Pre-MRP 3.0 High-Flow Capacity Systems |
| ● MRP 3.0 Sustainable Streets | ■ MRP 3.0 High-Flow Capacity Systems |
| ● Expected Sustainable Streets | ■ Pre-MRP 3.0 Catch Basin Inserts |
| ■ Pre-MRP 3.0 GI/LID Projects | ■ MRP 3.0 Catch Basin Inserts |
| ■ MRP 3.0 GI/LID Projects | □ Town Limits |
| ■ Expected GI/LID Projects | |



Map Created by EOA, Inc., August 2026
Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI

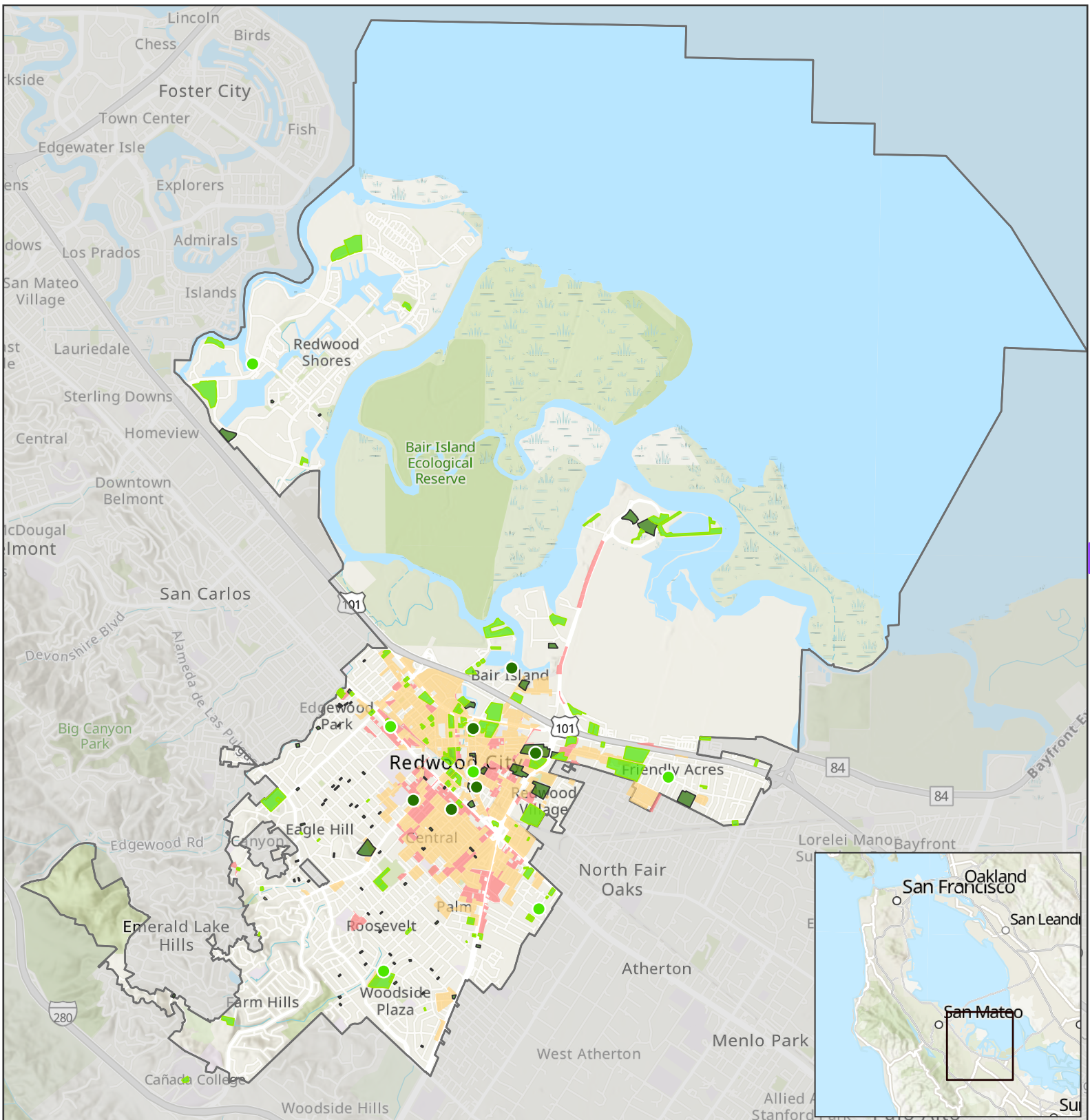


Figure B-16: GI/LID and Other Stormwater Treatment Systems in Redwood City

● Pre-MRP 3.0 Sustainable Streets

● MRP 3.0 Sustainable Streets

● Expected Sustainable Streets

■ Pre-MRP 3.0 GI/LID Projects

■ MRP 3.0 GI/LID Projects

■ Expected GI/LID Projects

■ Pre-MRP 3.0 High-Flow Capacity Systems

■ MRP 3.0 High-Flow Capacity Systems

■ Pre-MRP 3.0 Catch Basin Inserts

■ MRP 3.0 Catch Basin Inserts

□ City Limits

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Map Created by EOA, Inc., August 2026

Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI

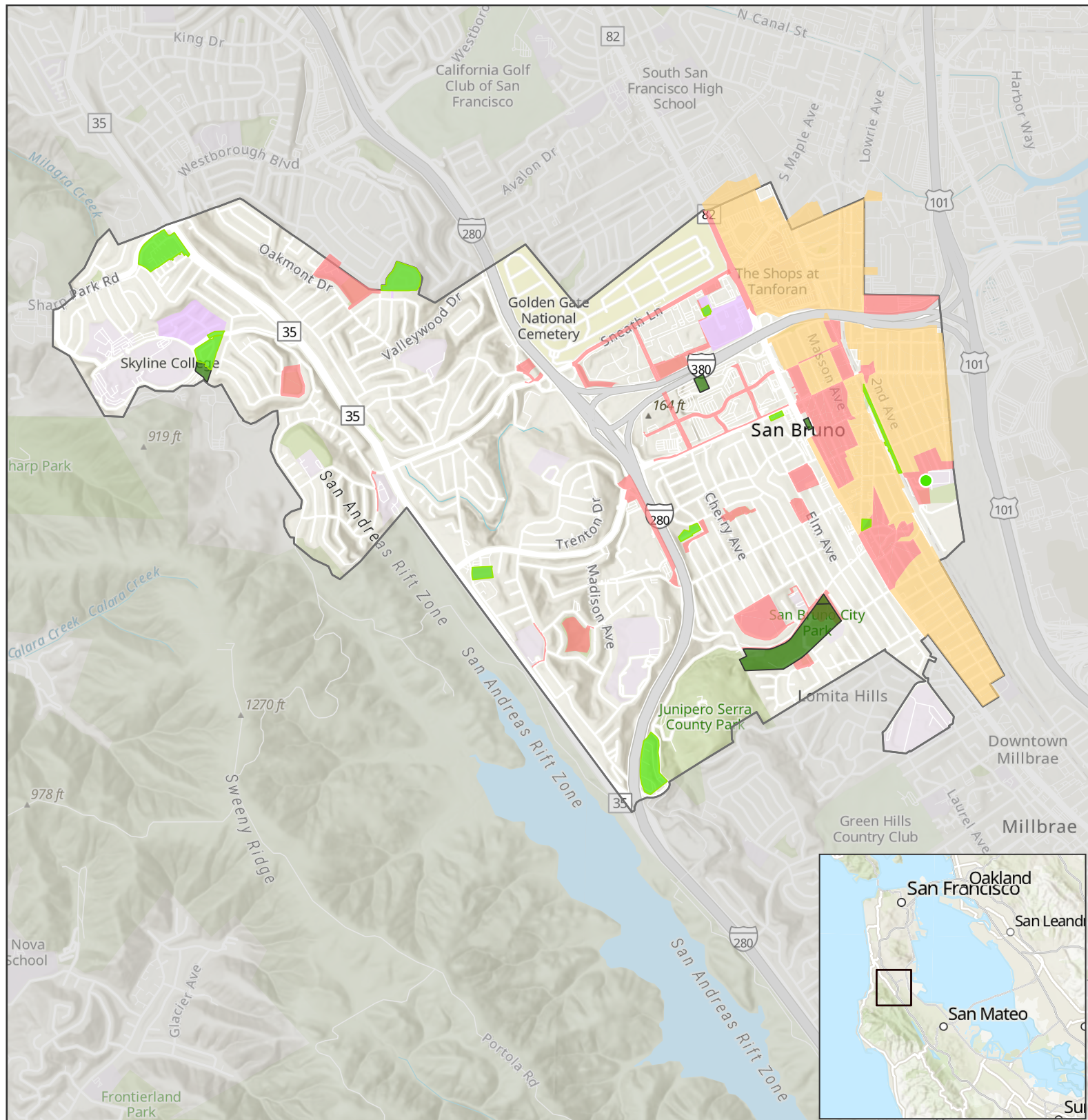


Figure B-17: GI/LID and Other Stormwater Treatment Systems in San Bruno

- Pre-MRP 3.0 Sustainable Streets
- MRP 3.0 Sustainable Streets
- Expected Sustainable Streets
- Pre-MRP 3.0 GI/LID Projects
- MRP 3.0 GI/LID Projects
- Expected GI/LID Projects
- Pre-MRP 3.0 High-Flow Capacity Systems
- MRP 3.0 High-Flow Capacity Systems
- Pre-MRP 3.0 Catch Basin Inserts
- MRP 3.0 Catch Basin Inserts
- City Limits



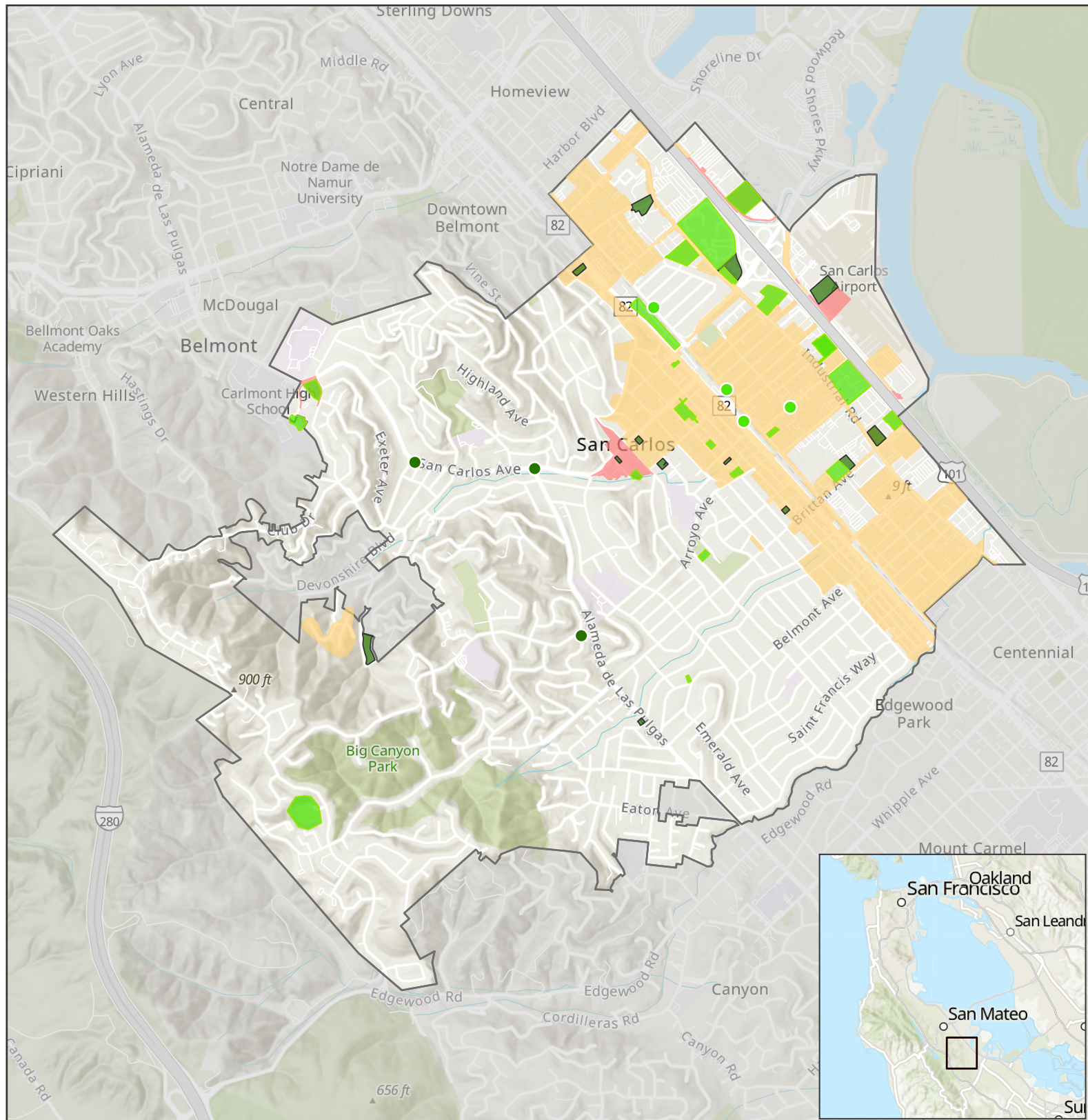


Figure B-18: GI/LID and Other Stormwater Treatment Systems in San Carlos

● Pre-MRP 3.0 Sustainable Streets

● MRP 3.0 Sustainable Streets

● Expected Sustainable Streets

■ Pre-MRP 3.0 GI/LID Projects

■ MRP 3.0 GI/LID Projects

■ Expected GI/LID Projects

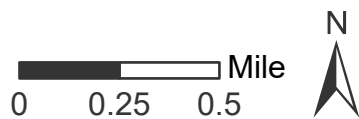
■ Pre-MRP 3.0 High-Flow Capacity Systems

■ MRP 3.0 High-Flow Capacity Systems

■ Pre-MRP 3.0 Catch Basin Inserts

■ MRP 3.0 Catch Basin Inserts

□ City Limits



Map Created by EOA, Inc., August 2026

Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI

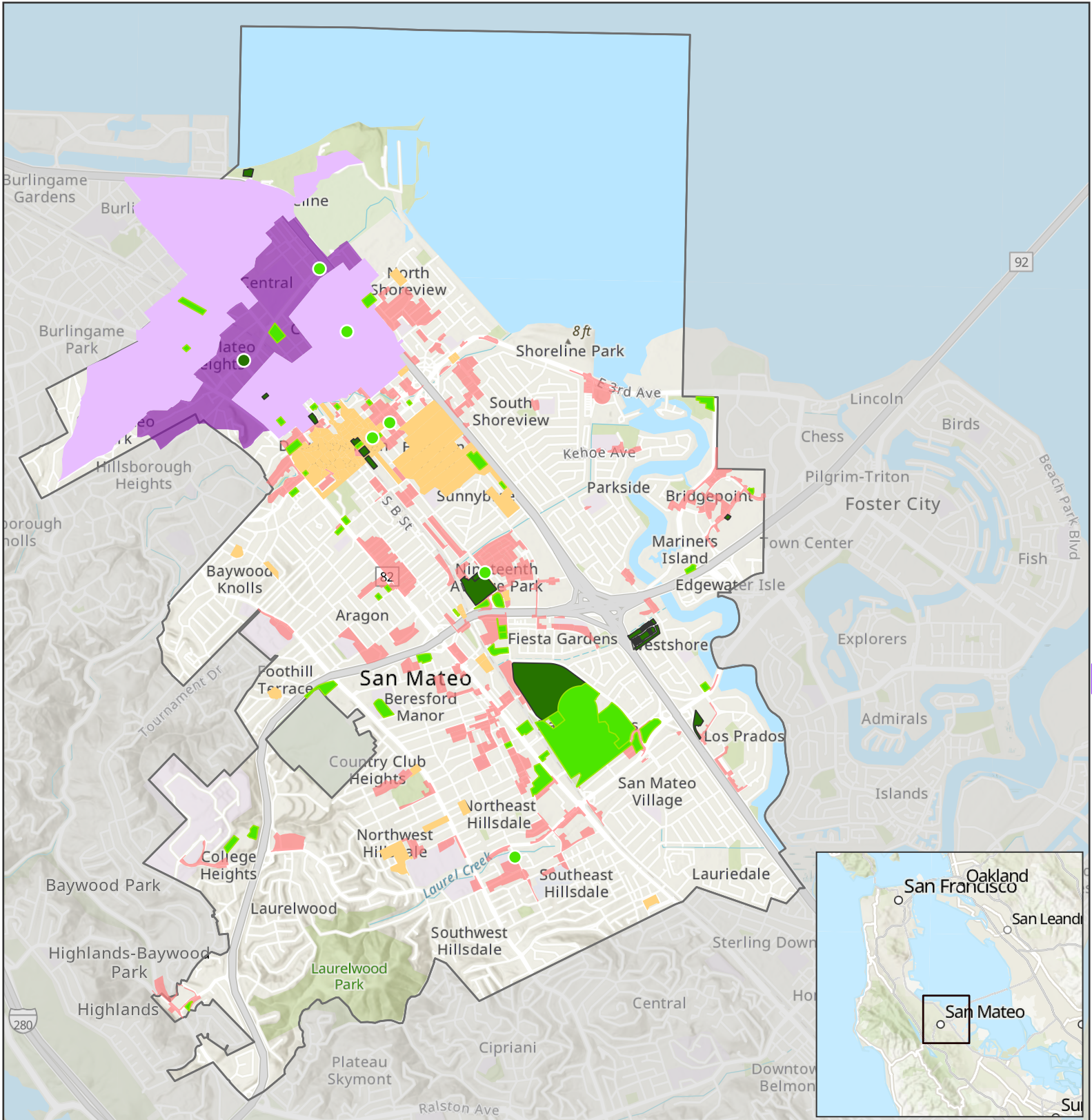


Figure B-19: GI/LID and Other Stormwater Treatment Systems in San Mateo

- Pre-MRP 3.0 Sustainable Streets
- MRP 3.0 Sustainable Streets
- Expected Sustainable Streets
- Pre-MRP 3.0 GI/LID Projects
- MRP 3.0 GI/LID Projects
- Expected GI/LID Projects
- Pre-MRP 3.0 High-Flow Capacity Systems
- MRP 3.0 High-Flow Capacity Systems
- Pre-MRP 3.0 Catch Basin Inserts
- MRP 3.0 Catch Basin Inserts
- City Limits

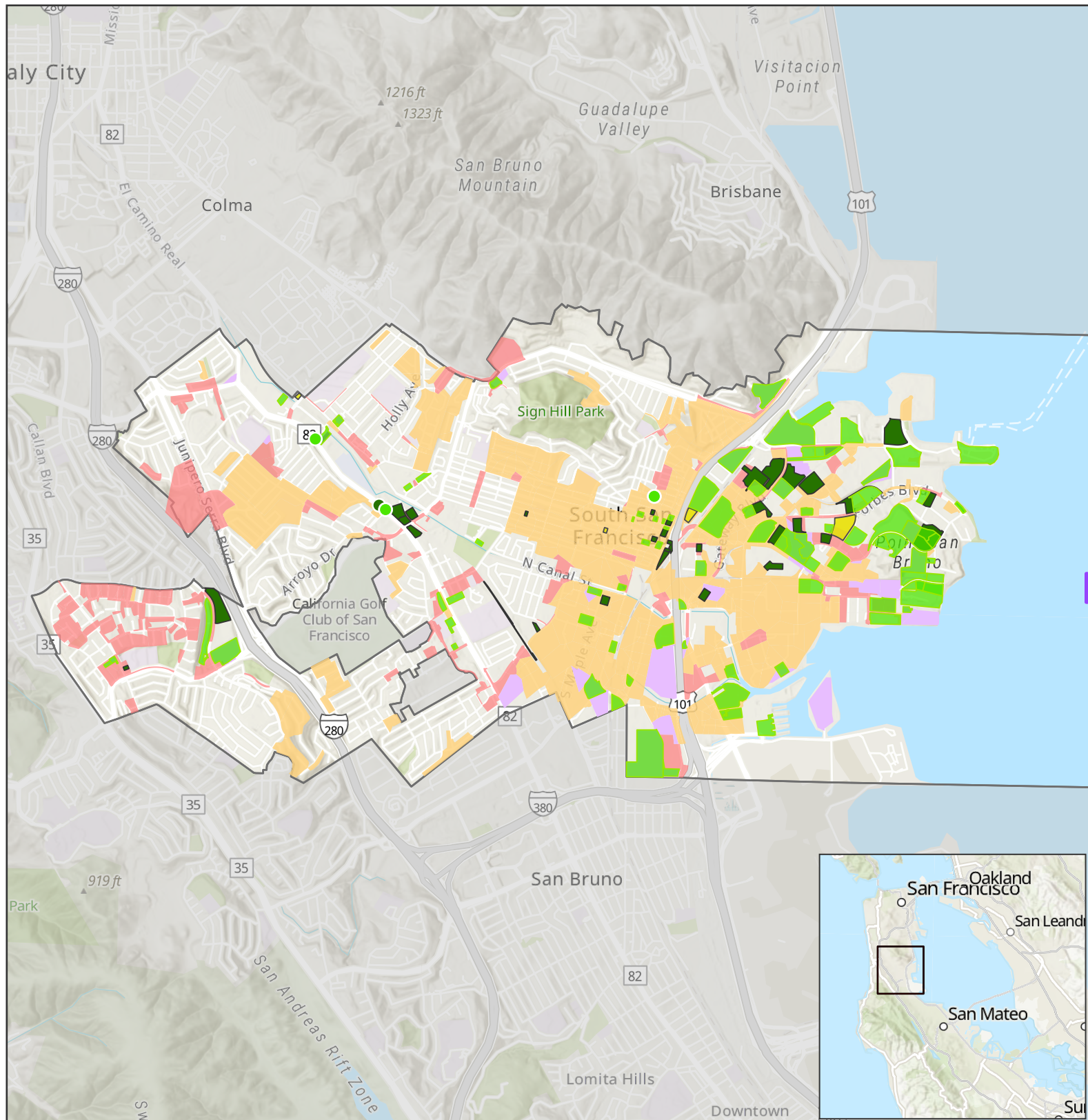
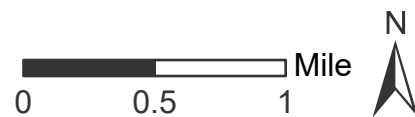
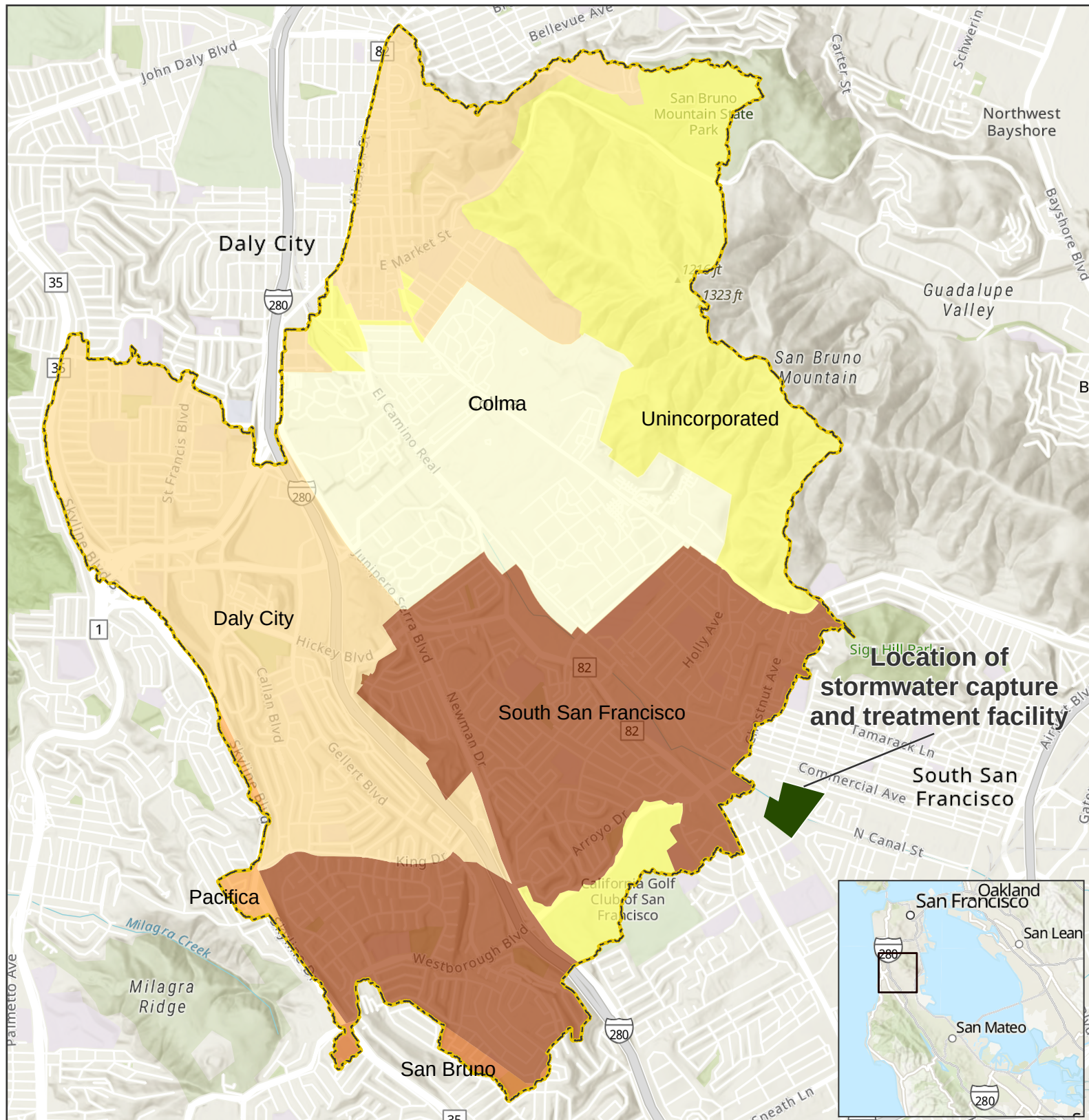


Figure B-20a: GI/LID and Other Stormwater Treatment Systems in South San Francisco

- Pre-MRP 3.0 Sustainable Streets
- MRP 3.0 Sustainable Streets
- Expected Sustainable Streets
- Pre-MRP 3.0 GI/LID Projects
- MRP 3.0 GI/LID Projects
- Expected GI/LID Projects
- Pre-MRP 3.0 High-Flow Capacity Systems
- MRP 3.0 High-Flow Capacity Systems
- Pre-MRP 3.0 Catch Basin Inserts
- MRP 3.0 Catch Basin Inserts
- City Limits



Map Created by EOA, Inc., August 2026
Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI



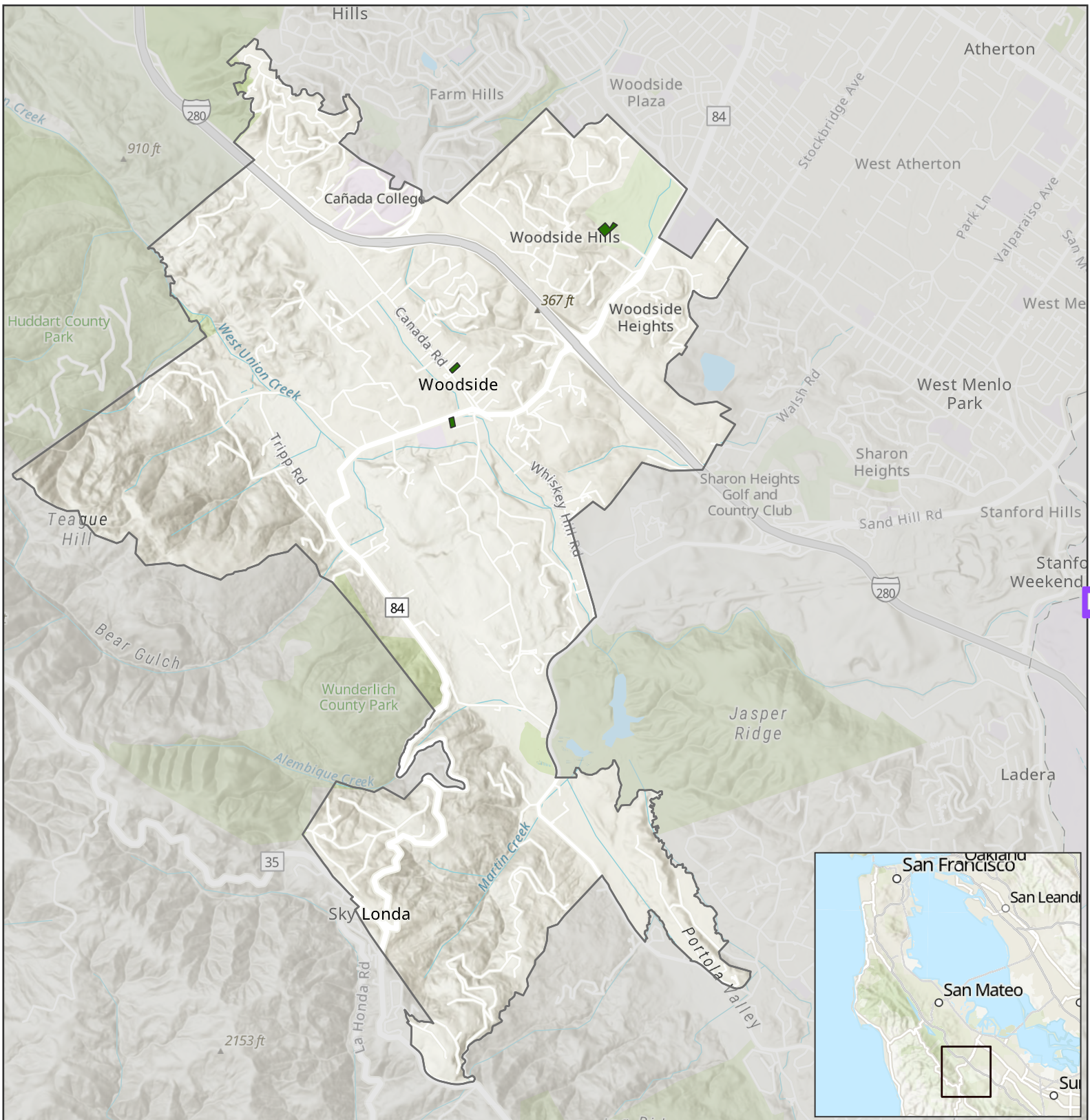
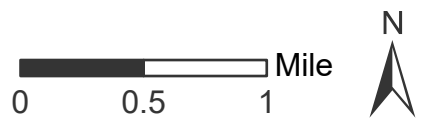


Figure B-21: GI/LID and Other Stormwater Treatment Systems in Woodside

- | | |
|---|--|
| ● Pre-MRP 3.0 Sustainable Streets | ■ Pre-MRP 3.0 High-Flow Capacity Systems |
| ● MRP 3.0 Sustainable Streets | ■ MRP 3.0 High-Flow Capacity Systems |
| ● Expected Sustainable Streets | ■ Pre-MRP 3.0 Catch Basin Inserts |
| ■ Pre-MRP 3.0 GI/LID Projects | ■ MRP 3.0 Catch Basin Inserts |
| ■ MRP 3.0 GI/LID Projects | □ Town Limits |
| ■ Expected GI/LID Projects | |



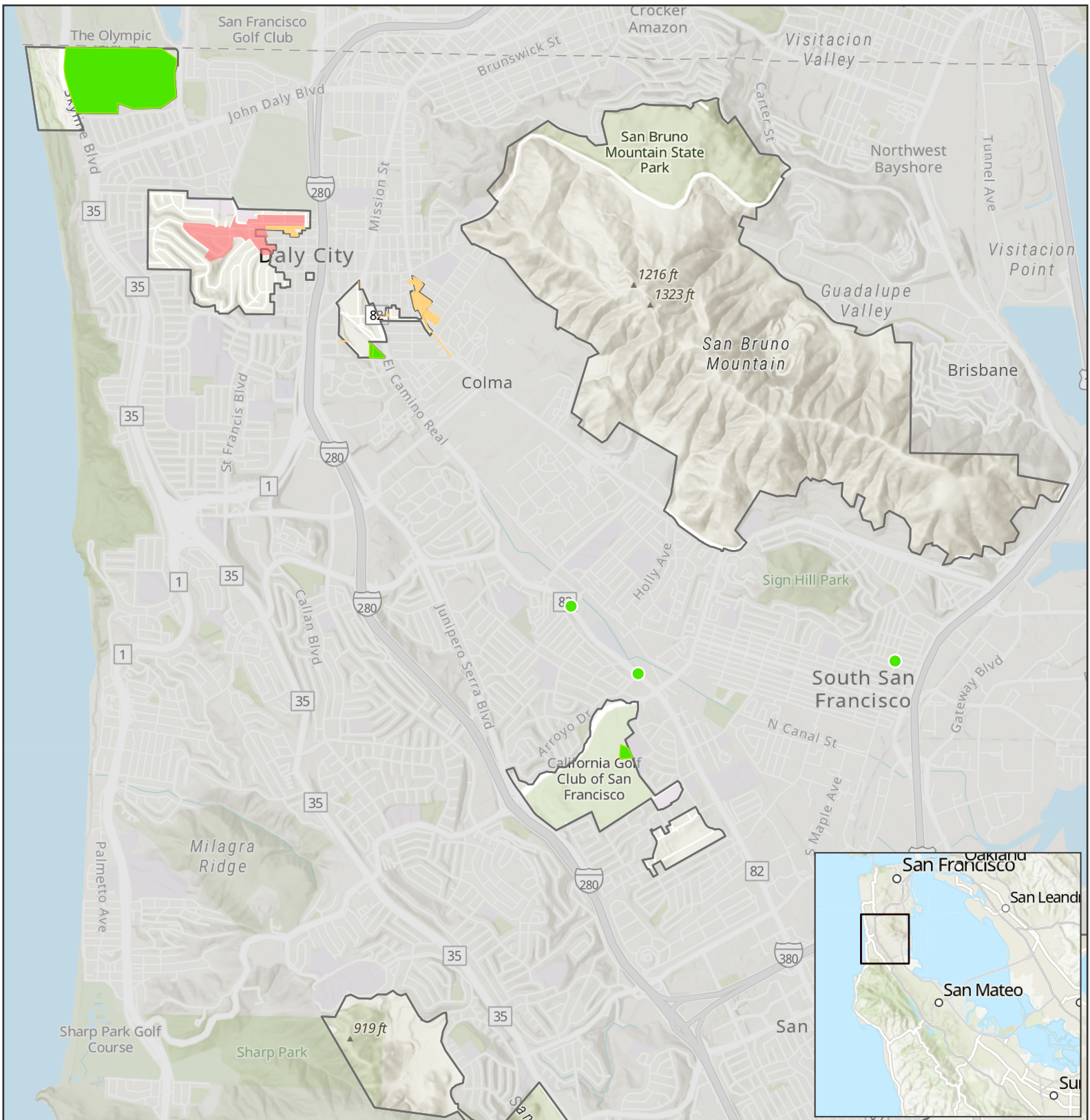
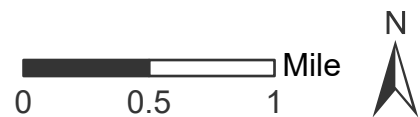


Figure B-22a: GI/LID and Other Stormwater Treatment Systems in San Mateo County

- | | |
|---|--|
| ● Pre-MRP 3.0 Sustainable Streets | ■ Pre-MRP 3.0 High-Flow Capacity Systems |
| ● MRP 3.0 Sustainable Streets | ■ MRP 3.0 High-Flow Capacity Systems |
| ● Expected Sustainable Streets | ■ Pre-MRP 3.0 Catch Basin Inserts |
| ■ Pre-MRP 3.0 GI/LID Projects | ■ MRP 3.0 Catch Basin Inserts |
| ■ MRP 3.0 GI/LID Projects | □ Unincorporated Boundary |
| ■ Expected GI/LID Projects | |



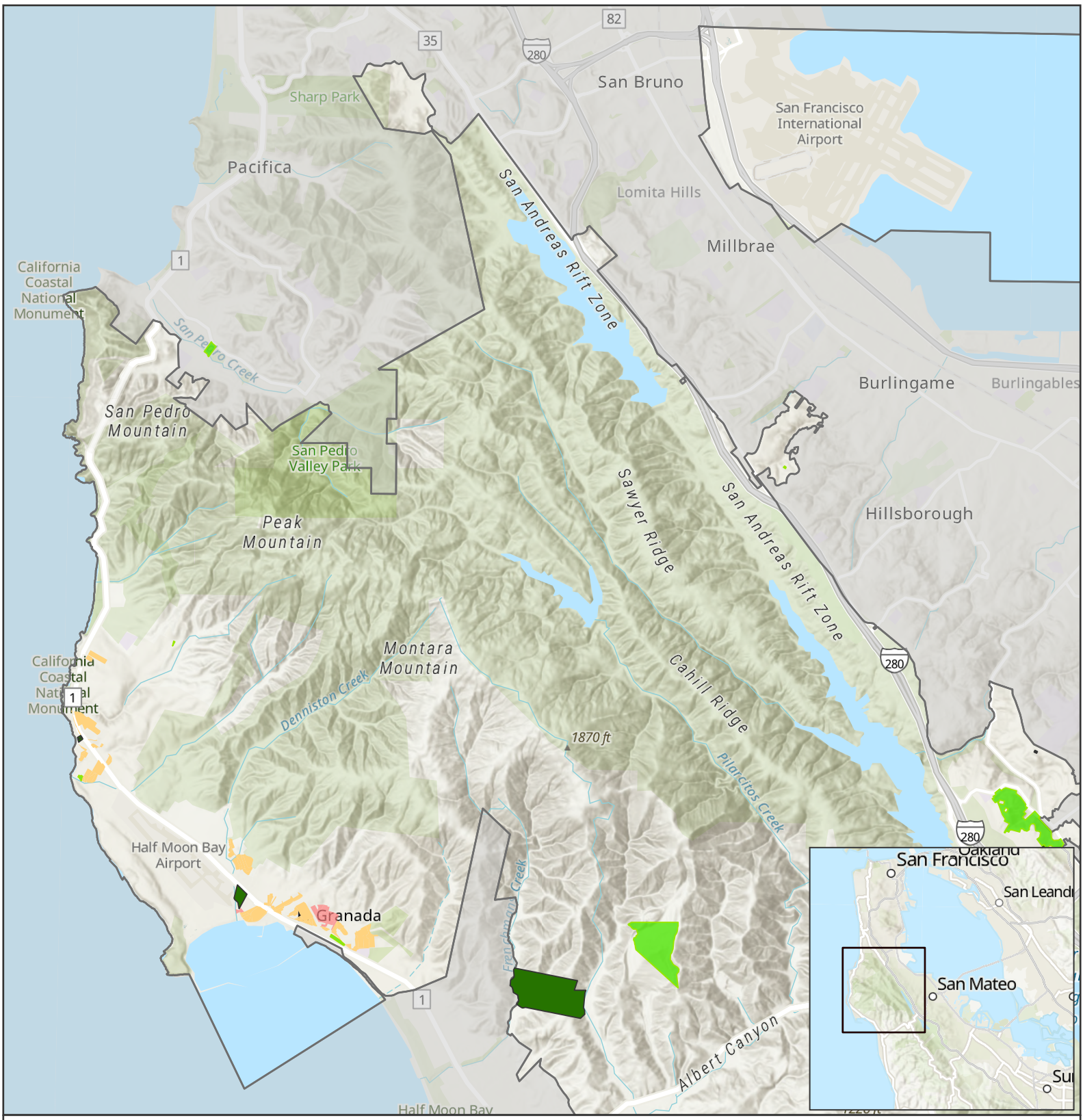


Figure B-22b: GI/LID and Other Stormwater Treatment Systems in San Mateo County

● Pre-MRP 3.0 Sustainable Streets	 Pre-MRP 3.0 High-Flow Capacity Systems
● MRP 3.0 Sustainable Streets	 MRP 3.0 High-Flow Capacity Systems
● Expected Sustainable Streets	 Pre-MRP 3.0 Catch Basin Inserts
 Pre-MRP 3.0 GI/LID Projects	 MRP 3.0 Catch Basin Inserts
 MRP 3.0 GI/LID Projects	 Unincorporated Boundary
 Expected GI/LID Projects	

Miles

0 0.5 1 2

Map Created by EOA, Inc., August 2026

Data Sources: Jurisdiction Boundaries - San Mateo County, Basemap - ESRI

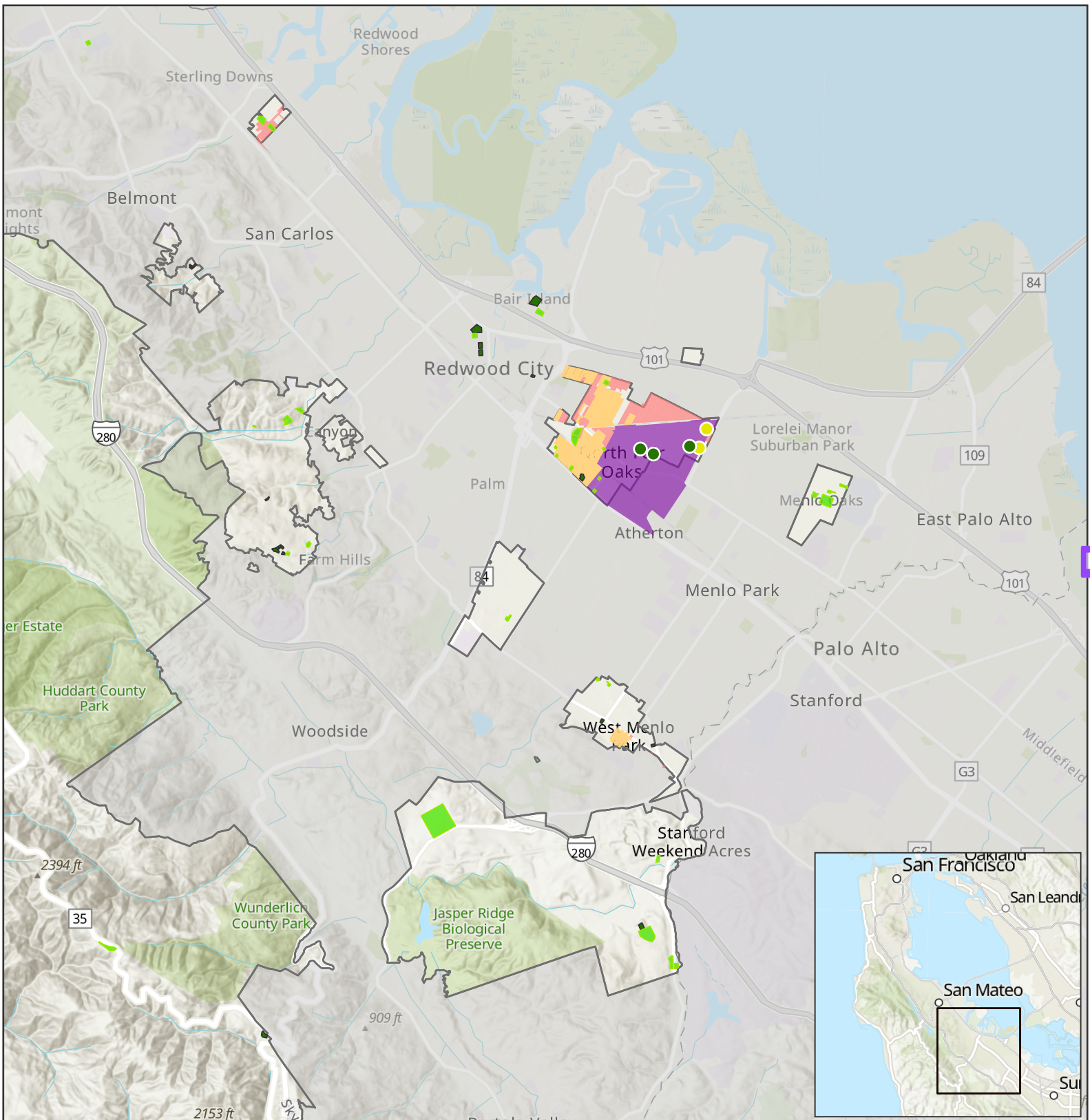


Figure B-22c: GI/LID and Other Stormwater Treatment Systems in San Mateo County

- | | |
|-----------------------------------|--|
| ● Pre-MRP 3.0 Sustainable Streets | ■ Pre-MRP 3.0 High-Flow Capacity Systems |
| ● MRP 3.0 Sustainable Streets | ■ MRP 3.0 High-Flow Capacity Systems |
| ● Expected Sustainable Streets | ■ Pre-MRP 3.0 Catch Basin Inserts |
| ■ Pre-MRP 3.0 GI/LID Projects | ■ MRP 3.0 Catch Basin Inserts |
| ■ MRP 3.0 GI/LID Projects | □ Unincorporated Boundary |
| ■ Expected GI/LID Projects | |

ATTACHMENT C

PROGRAM FOR MANAGEMENT OF PCBs DURING BUILDING DEMOLITION – DATA SUMMARY THROUGH FY 2025/26 FOR SAN MATEO COUNTY MRP PERMITTEES

TO SMCWPPP NPDES Technical Advisory Committee and Representatives of Municipal Programs to Manage PCBs During Building Demolition

FROM: Program Staff

DATE: September 30, 2026

SUBJECT: Fiscal Year 2025-26 Data Summary for the SMCWPPP Permittees PCBs in Building Demolition Management Program

Background

Provision C.12.g. of the Municipal Regional Permit (MRP 3.0)¹ requires Permittees to manage PCBs-containing materials and wastes during building demolition activities. San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) Permittees and other MRP Permittees have developed and implemented a program for managing materials with PCBs concentrations of 50 mg/kg or greater² in applicable structures at the time the structures undergo demolition. Applicable structures are defined as buildings constructed or remodeled between the years 1950 and 1980 that are undergoing full-building demolition. Single-family residential and wood frame structures are exempt.

For the purpose of annual reporting, this technical memorandum documents the following items for San Mateo County MRP Permittees:

- The number of demolition permits for applicable structures that project applicants applied for during fiscal year (FY) 25-26, the seventh year of the program, and during previous FYs (data from FY 19-20 through FY 24-25);
- A running list of the applicable structures (with the address and demolition date for each structure) for which a demolition permit was applied for by project applicants since July 1, 2019 (the date the PCBs control program began implementation) that had material(s) with total PCB concentrations ≥ 50 mg/kg;
- For data provided in FY 25-26 by project applicants that had total PCBs concentrations ≥ 50 mg/kg, the PCBs concentration in each sample and a brief description of PCBs-containing materials that were sampled;
- The number of building material samples collected from applicable structures during the past five fiscal years (FY 22-23 through FY 25-26), categorized by PCBs concentration; and
- The distribution of samples collected among three PCBs concentration categories.

Number of Applicable Structure Applications

Table 1 summarizes the number of applicable structure demolition permit applications for FY 19-20 through FY 25-26 by each Permittee and the number of associated building material samples with PCBs concentrations equal to or greater than 50 mg/kg.

¹ NPDES Permit No. CAS612008, Order No. R2-2022-0018.

²While the MRP specifies the units of measurement as ppm, mg/kg is the unit used throughout this report as it is the unit that analytical laboratories report their values for PCBs analysis and is equivalent to ppm.

Table 1 Number of applications received by SMCWPPP Permittees in FYs 19-20 through 25-26 for demolition of applicable structures.

Permittee	Number of Applicable Structures ^a							Number of Samples with PCBs ≥ 50 mg/kg						
	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24	FY 24-25	FY 25-26
Atherton	0	0	0	0	0	0	0	NA	NA	NA	NA	NA	NA	NA
Belmont	0	0	0	0	0	0	0	NA	NA	NA	NA	NA	NA	NA
Brisbane	0	0	0	0	0	0	0	NA	NA	NA	NA	NA	NA	NA
Burlingame	1	2	4	2	1	0	3	0	0	7	0	NA	NA	1
Colma	0	0	0	0	0	0	0	NA	NA	NA	NA	NA	NA	NA
Daly City	0	0	0	1	0	0	0	NA	NA	NA	0	NA	NA	NA
East Palo Alto	0	0	0	0	0	0	0	NA	NA	NA	NA	NA	NA	NA
Foster City	0	0	0	0	0	0	1	NA	NA	NA	NA	NA	NA	NA
Half Moon Bay	0	0	0	0	0	0	0	NA	NA	NA	NA	NA	NA	NA
Hillsborough	0	0	0	0	0	0	0	NA	NA	NA	NA	NA	NA	NA
Menlo Park	1	2	9	0	0	2	1	1	0	2	NA	NA	12	0
Millbrae	0	0	0	0	0	0	0	NA	NA	NA	NA	NA	NA	NA
Pacifica	0	0	2	0	0	0	0	NA	NA	0	NA	NA	NA	NA
Portola Valley	0	0	0	0	0	0	0	NA	NA	NA	NA	NA	NA	NA
Redwood City	1	3	2	0	2	1	0	0	12	4	NA	0	0	0
San Bruno	0	0	0	0	1	1	0	NA	NA	NA	NA	0	0	0
San Carlos	1	2	0	0	0	1	2	0	12	NA	NA	NA	NA	NA
San Mateo	0	2	0	0	0	0	1	NA	0	NA	NA	NA	NA	NA
S. San Francisco	6	7	13	2	0	1	3	1	0	2	5	NA	0	0
Woodside	0	1	0	0	0	0	0	NA	0	NA	NA	NA	NA	NA
San Mateo County	1	0	0	0	0	0	0	0	NA	NA	NA	NA	NA	NA
Total	11	19	30	5	4	6	11	2	24	15	5	0	12	1

NA – Not Applicable (i.e., No applicable structures, therefore no associated samples were reported).

^aThe number of applicable structures previously reported in FY 24-25 have been updated to reflect application materials received by SMCWPPP after submittal of the FY 24-25 Annual Report.

List of Applicable Structures

Table 2 provides a running list of the applicable structures for which a project applicant applied for a demolition permit since July 1, 2019, that had materials with PCBs concentrations ≥ 50 mg/kg. For each applicable structure, the address, estimated demolition date, number of samples with PCBs concentrations ≥ 50 mg/kg, and the range of PCBs concentrations in those samples are included.

Table 2. List of applicable structures in SMCWPPP Permittee jurisdictions between FYs 19-20 and 25-26 for which project applicants applied for a demolition permit and samples collected were greater than or equal to 50 mg/kg.

Fiscal Year (FY)	Permittee	SMCWPPP Building ID	Address	Estimated Demolition Date	# of Samples with PCBs ≥ 50 mg/kg	PCBs Concentration Range in Samples with PCBs ≥ 50 mg/kg
2019-20	Menlo Park	SM-2	305 Constitution Dr.	Jan 2020	1	54.5
	S. San Francisco	SM-6	1 Chestnut Ave.	Jan 2020	1	247
2020-21	San Carlos	SM-17	1075 Commercial St. / 915 Old County Rd.	Mar 2021	12	52-250,000
	Redwood City	SM-28	975 Maple St.	Jul 2021	2	97-102
	Redwood City	SM-29	1150 Veterans Blvd.	Oct 2021	10	50-330,000
2021-22	Menlo Park	SM-42	1390 Willow Road (MPK 50)	Apr/May 2022	2	340-790
	Redwood City	SM-55	1306 Main St.	Jun 2022	4	580-5,000
	S. San Francisco	SM-56	225 Spruce St.	Fall 2022	2	1,200-25,000
	Burlingame	SM-57	810 Malcolm Rd.	Fall 2022	7	56-64,000
2022-23	S. San Francisco	SM-61	466 Forbes Blvd.	Aug 2022	5	57-130,000
2023-24	N/A	N/A	N/A	N/A	N/A	N/A
2024-25	Menlo Park	SM-70	119 Independence Drive	Early 2024	4	35,000–96,000
	Menlo Park	SM-71	130 Constitution Drive	Early 2024	8	50–3,300
2025-26	Burlingame	SM-77	1868-1870 Ogden Drive	Jun 2026	1	97,000

List Building Material Samples Reported During MRP 3.0 with PCBs ≥ 50 mg/kg

Table 3 provides a list of building material samples with PCBs ≥ 50 mg/kg as reported by project applicants during MRP 3.0 FYs 22-23 through FY 25-26. Table 3 also includes the PCBs concentration in each sample, and a brief description of the PCBs-containing materials that were sampled.

Table 3. List of fiscal year (FY)22-23 through FY25-26 Samples with PCBs $\geq$ 50 mg/kg.

Sample Name	PCBs Concentration (mg/kg)	Material Description
SMCWPPP Building ID SM-61, 466 Forbes Blvd., South San Francisco (FY 22-23)		
PCB-04C	24,000	Caulk
PCB-04D	84,000	Caulk
PCB-04E	130,000	Caulk
PCB-03C	57	Rubber Window Gasket
PCB-03D	68	Rubber Window Gasket
SMCWPPP Building ID N/A (FY 23-24)		
N/A	N/A	N/A
SMCWPPP Building ID SM-70, 119 Independence Drive (FY 24-25)		
Exterior Concrete Wall Expansion Joint Compound - NW Corner (PCB105A)	45,000	Caulk
Exterior Concrete Wall Expansion Joint Compound - West Wall (PCB105B)	62,000	Caulk
Exterior Concrete Wall Expansion Joint Compound - SW Corner (PCB105C)	35,000	Caulk
Exterior Concrete Wall Expansion Joint Compound - East Wall (PCB105E)	96,000	Caulk
SMCWPPP Building ID SM-71, 130 Constitution Drive (FY 24-25)		
Yellow Fiberglass Duct Insulation (PCB108A)	1,700	Fiberglass Insulation
Black Tile Mastic (PCB100A)	50	Adhesive Mastic
Yellow Tile Mastic (PCB101A)	2,800	Adhesive Mastic
Yellow Tile Mastic (PCB101B)	400	Adhesive Mastic
Yellow Tile Mastic (PCB101C)	510	Adhesive Mastic
Yellow Tile Mastic (PCB101D)	2,500	Adhesive Mastic
Yellow Tile Mastic (PCB101E)	3,300	Adhesive Mastic
Yellow/Black Tile and Carpet Mastic (PCB102E)	150	Adhesive Mastic
SMCWPPP Building ID SM-77, 1868-1870 Ogden Drive (FY 25-26)		
Caulk (P-1)	97,000	Caulk

Summary of PCBs Observed in Building Material Samples During FYs 19-20 through 25-26

Figure 1 summarizes the number of building material samples collected from applicable structures in SMCWPPP Permittee jurisdictional areas during the past seven fiscal years (FYs 19-20 through 25-26), categorized by PCBs concentration:

1. PCBs Not Detected (ND)
2. PCBs $<$ 50 mg/kg
3. PCBs $\geq$ 50 mg/kg

Figure 2 summarizes the total number of building material samples, distributed among the above three PCBs concentration categories.

Figure 1. San Mateo County Building Materials PCBs Sampling Results by Fiscal Year (FY) and PCBs Concentration Category

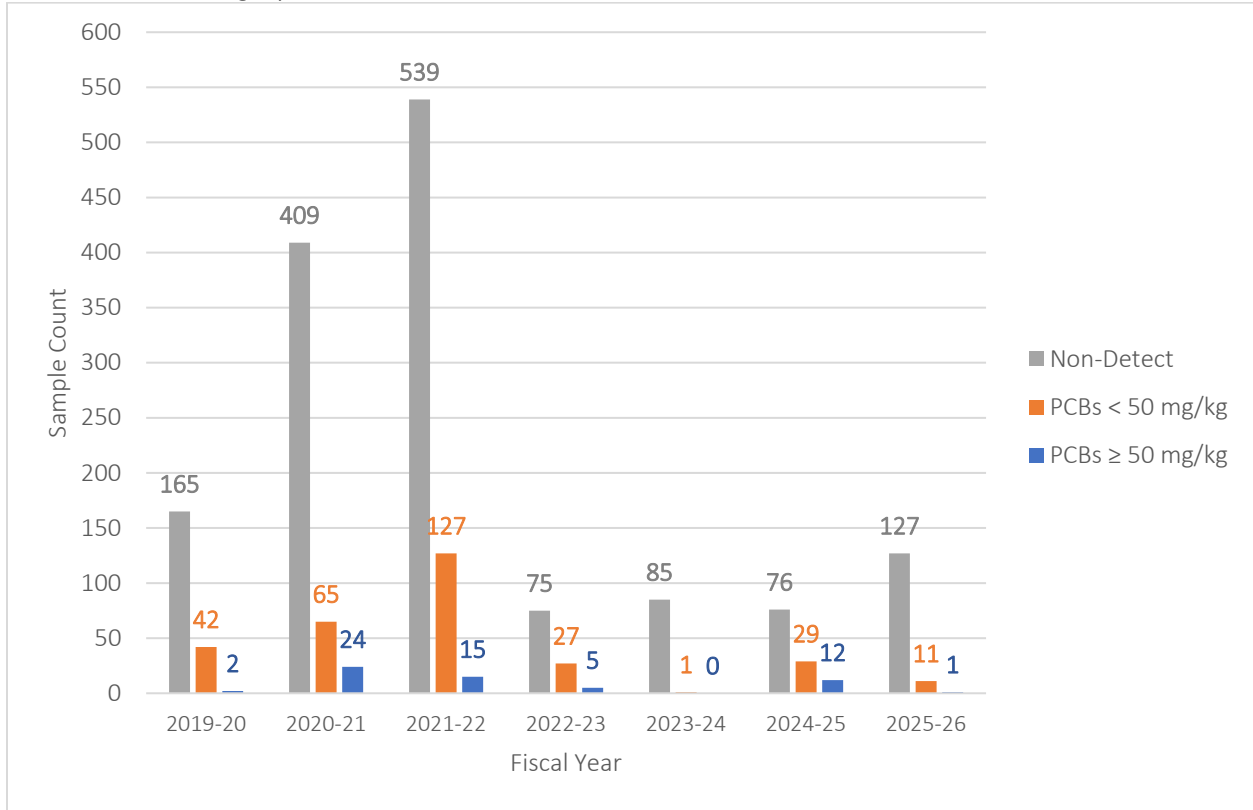


Figure 2. San Mateo County Building Materials PCBs Sampling Results - Percentage Distribution Among PCBs Concentration Categories

