Executive Summary

This Jurisdictional Urban Runoff Management Plan (URMP) is a total account of how the City of San Diego plans to protect and improve the water quality of rivers, bays and the ocean in the City of San Diego. The City of San Diego is committed to reducing storm water pollution for the protection of human health and safety and the natural environment. Potentially harmful viruses and bacteria, along with soil particles, solids, debris, litter, oil, and chemical compounds, can runoff the urban environment and into our receiving waters because our storm drain system is designed to convey only clean storm water to the nearest canyon, creek, beach or bay. Pollutants from daily human activities in storm water runoff is not only a problem during rainy seasons, but also year-round due to activities such as over irrigation runoff, illegal dumping, littering, and failing to pick up after pets.

The Storm Water Pollution Prevention Division in the General Services Department is the lead office for the City of San Diego's efforts to reduce pollutants in urban runoff and storm water to the maximum extent practicable. It is the mission of the Storm Water Pollution Prevention Division to:

Mission Statement:
"Protect and improve the water quality of rivers, bays and the ocean for the citizens of San Diego and future generations by eliminating and reducing pollutants in urban runoff and storm water in an efficient, effective and professional manner as part of a high-performing team through public education, employee training, watershed collaboration, field testing, investigations, enforcement, regional programs, and coordination."

With the help of other City departments, the Storm Water Pollution Prevention Division developed this Urban Runoff Management Plan. It explains how the City intends to comply with Order No. 2007-0001, NPDES No. CAS0108758, Waste Discharge Requirements for Discharges of Urban Runoff From the Municipal Separate Storm Sewer Systems (MS4) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County, and the San Diego Unified Port District, hereafter referred to as the "Municipal Permit." The Municipal Permit was issued by the San Diego Regional Water Quality Control Board on January 24, 2007 and has a five-year life span. The effective implementation date for this document and all of its requirements by the City of San Diego is January 24, 2008 through January 24, 2013.

The City's URMP Program must meet the requirements of the Municipal Permit, summarized below in Table 1.

Table 1. Municipal Permit Requirements – Jurisdictional Urban Runoff Management Program.

Permit Section	Requirement (Summary)	Compliance Date
J.1	Submit to the Principal Permittee an individual Jurisdictional URMP document which describes all activities it will undertake or is undertaking to implement the requirements of the Municipal Permit.	Prior to 365 days after adoption of Municipal Permit (1/25/08)
D.	Take appropriate actions to reduce discharges of pollutants and runoff flow during each of the three major phases of development, i.e. the planning, construction, and existing development (or use) phases and that addresses the following: • Land-Use Planning for New Development and Redevelopment • Construction • Existing Development (Municipal, Industrial/Commercial, Residential) • Illicit Discharge Detection and Elimination • Education • Public Participation • Effectiveness Assessment • Fiscal Analysis	365 Days after adoption of Municipal Permit (1/25/08)
J.3	Submit a Jurisdictional URMP Annual Report detailing how the City met the Municipal Permit requirements during the fiscal year.	By September 30, 2008 and annually thereafter

To meet the above Municipal Permit requirements, the Storm Water Pollution Prevention Division, with the help of City departments, developed the City of San Diego's Jurisdictional Urban Runoff Management Program Plan, adopted by the Mayor and City Council on [tentatively January 9, 2008]. See Section 1.0, "Introduction" for a summary of the URMP's contents.

Since the last Municipal Permit was issued in January of 2001, many improvements have been incorporated into the URMP. Many of the changes are mandated by the Municipal Permit, while some of the changes were initiated by the City to improve effectiveness, efficiency, and streamline resources. A summary of the changes is outlined in Section 14.0, "Modifications to the URMP." Notable changes include:

- Each department made significant improvements to internal water quality protection practices and procedures.
- The City will conduct a second inspection of municipal areas and facilities each year to ensure proper maintenance and use of good housekeeping practices and other BMPs.
- For both public and private new development/ redevelopment projects, the Storm Water Standards Manual has been updated with increased BMP requirements and inspection schedules.
- Increased staff education and training will occur across the City.
- Street Division will significantly increase it's storm drain cleaning and street sweeping programs.

- The Storm Water Division will significantly increase efforts in all of it's core programs including, facility inspections, enforcement, water quality monitoring, education and outreach, and municipal coordination.

Finally, and most importantly, the City must address several state- and federally-mandated storm water quality programs now and in the coming years. In addition to Municipal Permit requirements, the City must comply with State-mandated Areas of Special Biological Significance, or ASBS, requirements in the La Jolla Shores area, and future storm water quality regulations called Total Maximum Daily Load programs, or TMDLs. Drawing from the Clean Water Act, TMDL programs will set numeric or concentration based pollutant discharge limits at every storm drain outfall within the City. Though compliance costs are not definitively known, it is clear that achieving these requirements and protecting our valuable natural surface and recreational water resources will dwarf current Municipal Permit program costs.

The City is committed to protecting and improving water quality in the San Diego region. Updating and improving the URMP document is but one component to the Storm Water Pollution Prevention Division's overall efforts; the Storm Water Pollution Prevention Division recognizes the critical importance of integrating various regulatory programs to maximize efficiencies and pollution prevention efforts. The Storm Water Pollution Prevention Division has begun planning efforts to strategically and comprehensively address pending and future storm water quality regulations. The City recently completed a "Strategic Plan for Watershed Activity Implementation" (July 2007). This strategic planning document outlines a process for piloting a series of coordinated activities and assessing and improving their effectiveness so that the City can both maximize the efficiency of individual activities (such as street sweeping efforts) and also implement the most effective combination of activities to maximize overall water quality protection efforts. After improving activities through pilot programs, the City will implement these activities City-wide through this URMP program.

In conclusion, the City of San Diego is committed to its mission to protect and improve the quality of its receiving waters through the implementation of this URMP. The Storm Water Pollution Prevention Division has established an iterative implementation strategy that most efficiently obtains its goals through continual program planning, implementation, assessment and improvement. The Storm Water Pollution Prevention Division is continuing to shift its activities towards a watershed approach and this effort will eventually result in more prioritizing of efforts into specific areas of concern over the next five years.

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1.0 Introduction

It is important to prevent storm water pollution for protection of human health and safety and to protect the natural environment. Urban runoff pollution is not only a problem during rainy seasons, but also year-round due to human activities such as over-irrigation, littering, and hosing down or blowing yard clippings and other waste into the street where it eventually travels into the storm drain system. While the impact of urban runoff pollution may not be immediately realized, the cumulative effects can be dramatic. Potentially harmful viruses and bacteria are found in our coastal waters along with soil particles, solids/debris, litter, oil, and chemical compounds. Oil and grease from parking lots and roads, leaking petroleum storage tanks, pesticides, cleaning solvents, and other toxic chemicals can contaminate storm water and be transported into water bodies and receiving waters. Fertilizer constituents from lawns and golf courses and leaking septic tanks can cause algal blooms and encourage microbial growth to cause eutrophication. Disturbances of the soil from construction can allow silt to wash into the storm drain system and receiving waters making them muddy, turbid, and inhospitable to natural aquatic organisms. Sediment and trash also can transport bacteria downstream. Many artificial surfaces of the urban environment such as galvanized metal, paint, or preserved wood that contain heavy metals, can contribute to storm water pollution because the surfaces corrode, flake, dissolve, or decay. Heavy metals are toxic to aquatic organisms and may bio-accumulate, resulting in negative impacts to aquatic life activities such as sport fishing and the seafood industry.

The Storm Water Pollution Prevention Division is the lead office for the City's efforts to reduce pollutants in urban runoff and storm water to the maximum extent practicable. It is the mission of the Storm Water Pollution Prevention Division, General Services Department, to:

> "Protect and improve the water quality of rivers, bays and the ocean for the citizens of San Diego and future generations by eliminating and reducing pollutants in urban runoff and storm water in an efficient, effective and professional manner as part of a high-performing team through public education, employee training, watershed collaboration, field testing, investigations, enforcement, regional programs, and coordination."

The Storm Water Pollution Prevention Division has led the City's efforts to update this document, the Jurisdictional Urban Runoff Management Plan (URMP), which details the activities the City will undertake to improve water quality in the region and comply with the California Regional Water Quality Control Board San Diego Region Order No. R9-2007-0001 NPDES No. CAS0108758 Water Discharge Requirements for Discharges of Urban Runoff From Municipal Separate Storm Sewer Systems Draining Watersheds of the County of San Diego, The Incorporated Cities of San Diego County, and The San Diego Unified Port District (referred to as "Municipal Permit").

In order to comply with the Municipal Permit and implement the URMP, the Storm Water Pollution Prevention Division is actively engaged in a number of activities that will cumulatively result in cleaner water quality. These activities, include but are not limited to, public education, employee training, water quality monitoring, source identification, code enforcement, storm water best management practices (BMP) development, and BMP implementation within the City of San Diego's jurisdictional boundaries (see Appendix VII, "High Priority Residential Areas Inventory"). In addition, the Storm Water Pollution Prevention Division provides technical expertise and guidance to all City departments to ensure implementation and compliance with the Municipal Permit. The Storm Water Pollution Prevention Division represents the City on Municipal Permit issues before the Regional Water Quality Control Board. Furthermore, the Storm Water Pollution Prevention Division prepares and transmits an annual report of all City activities and is the responsible agent that certifies that the City is in compliance with all federal, state, and local laws.

1.1 Background

The 1972 Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) permit program to regulate the discharge of pollutants from point sources to waters of the United States. Since then, considerable strides have been made in reducing conventional forms of pollution, such as from sewage treatment plants and industrial facilities, through the implementation of the NPDES program and other federal, state, and local programs. The adverse effects of some of the persistent toxic pollutants were addressed through manufacturing and use restrictions and through cleanup of contaminated sites. However, non-point source pollution from storm water runoff was largely unabated until the 1987 Clean Water Act amendments, which established a framework for regulating non-point source pollutants. Storm water now contributes a larger portion of many kinds of pollutants than the more thoroughly regulated sewage treatment plans and industrial facilities.

Because of the intermittent, variable, and unpredictable nature of storm water runoff the U.S. Environmental Protection Agency (EPA), which administers the Clean Water Act, reasoned that the problems caused by storm water discharges were better managed at the local level through non-point source controls such as the use of specific management practices to prevent the pollutants from entering storm water and urban runoff. These practices are called storm water best management practices (BMPs). The US EPA has delegated its authority to the State of California. The State exercises its delegated authority through its agency, the State Water Resources Control Board, which uses a system of regional entities (the Regional Water Quality Control Boards) to enforce the Clean Water Act.

The Municipal Permit, originally issued in 1990, by the San Diego Regional Water Quality Control Board (Regional Board) was significantly revised when it was renewed on February 21, 2001 as Order No. 2001-01, NPDES No. CA0108758, The current Municipal Permit (Order No. R9-2007-0001, see Appendix I, "Municipal Permit") was

reissued on January 24, 2007. The Municipal Permit was reissued to San Diego County, San Diego Unified Port District, San Diego Airport Authority, and 18 cities, including the City of San Diego. The Municipal Permit contains a requirement for the City to update and implement a jurisdictional URMP.

In 1993, the City of San Diego enacted the Storm Water Management and Discharge Control Ordinance ("Storm Water Ordinance") §43.03, et seq. The Storm Water Ordinance seeks to ensure the health, safety, and general welfare of San Diegans by describing prohibited and allowed non-storm water discharges. The Storm Water Ordinance was amended in 2001 and again in January 2008 (see Appendix II, "Storm Water Management and Discharge Control Ordinance").

In addition, the City Council adopted revisions to the City's Grading Regulations (Land Development Code [LDC] §142.0146, and Drainage Regulations LDC §142.0146, which have been renamed the Storm Water Runoff Control and Drainage Regulations. The changes to the regulations were approved by the California Coastal Commission on November 16, 2001.The objectives of the ordinance revisions are to define and adopt storm water BMPs necessary to control storm water pollution from sediments, erosion, and construction materials to the maximum extent practicable during construction and during the use of developed sites. The City adopted these "construction" and "post-construction" BMPs in the Storm Water Standards Manual in December 2002. The City will be updating the Storm Water Standards Manual to incorporate new requirements in Municipal Permit Order No. 2007-0001.

1. 2 Purpose and Objectives

This URMP is a total account of how the City plans to protect and improve the water quality of rivers, bays and the ocean, and to comply with the Municipal Permit and the Clean Water Act.

The City's Program must meet the requirements of the Municipal Permit, summarized below in Table 1. The Permit requirements are fully enforceable via the Storm Water Ordinance §43.03.

Table 1. Municipal Permit Requirements

Permit Section	Requirement (Summary)	Compliance Date
D.	Take appropriate actions to reduce discharges of pollutants and runoff flow during each of the three major phases of development, i.e. the planning, construction, and existing development (or use) phases and that addresses the following: • Land-Use Planning for New Development and Redevelopment • Construction • Existing Development (Municipal, Industrial, Commercial, Residential)	365 Days after adoption of Municipal Permit (1/25/08)

Permit Section	Requirement (Summary)	Compliance Date
	• Illicit Discharge Detection and Elimination • Public Participation • Assessment of URMP Effectiveness • Fiscal Analysis	
J.1	Submit to the Principal Permittee an individual Jurisdictional URMP document which describes all activities it will undertake or is undertaking to implement the requirements of the Municipal Permit.	Prior to 365 days after adoption of Municipal Permit (1/25/08)
J.3	Submit a Jurisdictional URMP Annual Report detailing how the City met the Municipal Permit requirements during the fiscal year.	Prior to September 30, 2008 and annually thereafter

Each City department is responsible for implementing the Municipal Permit requirements applicable to their activities. Each department will perform the following:

- Certify acceptance of this URMP
- Identify a staffmember to coordinate with the Storm Water Pollution Prevention Division and oversee implementation of the department's storm water policies and procedures
- Comply with the minimum and activity-specific BMPs in the URMP
- Maintain records as required by the Municipal Permit
- Provide staff training
- Report the status of the URMP implementation to the Storm Water Pollution Prevention Division
- Annually certify compliance with all Municipal Permit requirements that apply to its department

1.3 Structure of the URMP

As the blueprint for the City's actions to protect and improve water quality, the URMP first describes the programs and activities that the Storm Water Pollution Prevention Division will implement to identify and abate sources of pollution, second, the URMP describes the construction and post-construction BMPs and procedures the City implements on development projects, and third, identifies the storm water BMPs that will be implemented by various City departments in order to ensure that the City will reduce pollutants in urban runoff and storm water to the maximum extent practicable while conducting their daily activities. There are 15 sections within the URMP:

1.0 Introduction
2.0 Administrative and Legal Procedures
3.0 Non-Storm Water Discharges
4.0 Development Planning Section
5.0 Construction Section
6.0 Municipal Section (see Sub-Sections below)

7.0 Industrial and Commercial Section
8.0 Residential Section
9.0 Illicit Discharge Detection and Elimination Section
10.0 Education Section
11.0 Public Participation Section
12.0 Fiscal Analysis Section
13.0 Effectiveness Assessment Section
14.0 Modifications to the JURMP
15.0 Conclusions and Recommendations

Within the Municipal Section, the City of San Diego includes sub-sections for its relevant municipal functions:

6.1 Introduction
6.2 Airports
6.3 Buildings/Parking/Landscaping
6.4 City-Owned Leased Properties
6.5 Household Hazardous Waste
6.6 Non-Emergency Fire-Rescue Activities
6.7 Non-Emergency Police Activities
6.8 Metropolitan Wastewater Collection
6.9 Metropolitan Wastewater Treatment and Maintenance
6.10 Recreational Lands and Facilities
6.11 Solid Waste Management
6.12 Special Events
6.13 Stadium
6.14 Streets/Storm Drain System
6.15 Vehicle Maintenance/Operations Yards
6.16 Water Systems

This format is intended for ease of use by City departments and to facilitate review by the Regional Board.

Contact List

City of San Diego

Storm Water Pollution Prevention Division (Main Number)…… (619) 525-8647

Storm Water Hotline in the City of San Diego…… (619) 235-1000

Chris Zirkle…… (619) 525-8644
Deputy Director

Yvonne Alcoser…… (619) 525-8642
Associate Management Analyst

Alicia Belen…… (619) 525-8629
Associate Management Analyst

Antonius Evans……..(619) 525-8683
Supervising Code Compliance Officer (enforcement and investigations)

Ruth Kolb…… (619) 525- 8636
Storm Water Specialist (special projects)

Drew Kleis…….. (619) 525-8623
Storm Water Specialist (jurisdictional and watersheds)

Jim Nabong…… (619) 525-8632
Associate Civil Engineer

Andre Sonksen……(619) 525-8563
Biologist III (water quality monitoring)

Vacant
Storm Water Specialist

Vacant
Supervising Public Information Officer

Spill Response Agencies

Sewer Emergency – Metropolitan Wastewater…… (858) 515-3525
Hazardous Materials discharges…… 911

Recycling, Hazardous Waste Disposal, and Reporting Illegal Dumping

Environmental Services Hotline…… (858) 694-7000

Clogged Catch Basin

Street Division……... (619) 527-7500

Regional Resources

County-wide Storm Water Hotline ……..888-THINKBLUE

2.0 Administrative and Legal Procedures

2.1 Department Roles and Responsibilities

The City's organization chart is presented in Figure 2-1[1]. Within the City's structure, those departments that perform activities that may affect storm water quality have adopted best management practices (BMPs) and procedures, as outlined in this Jurisdictional Urban Runoff Management Plan (URMP), that they are responsible for implementing Plan (see Table 2-1).

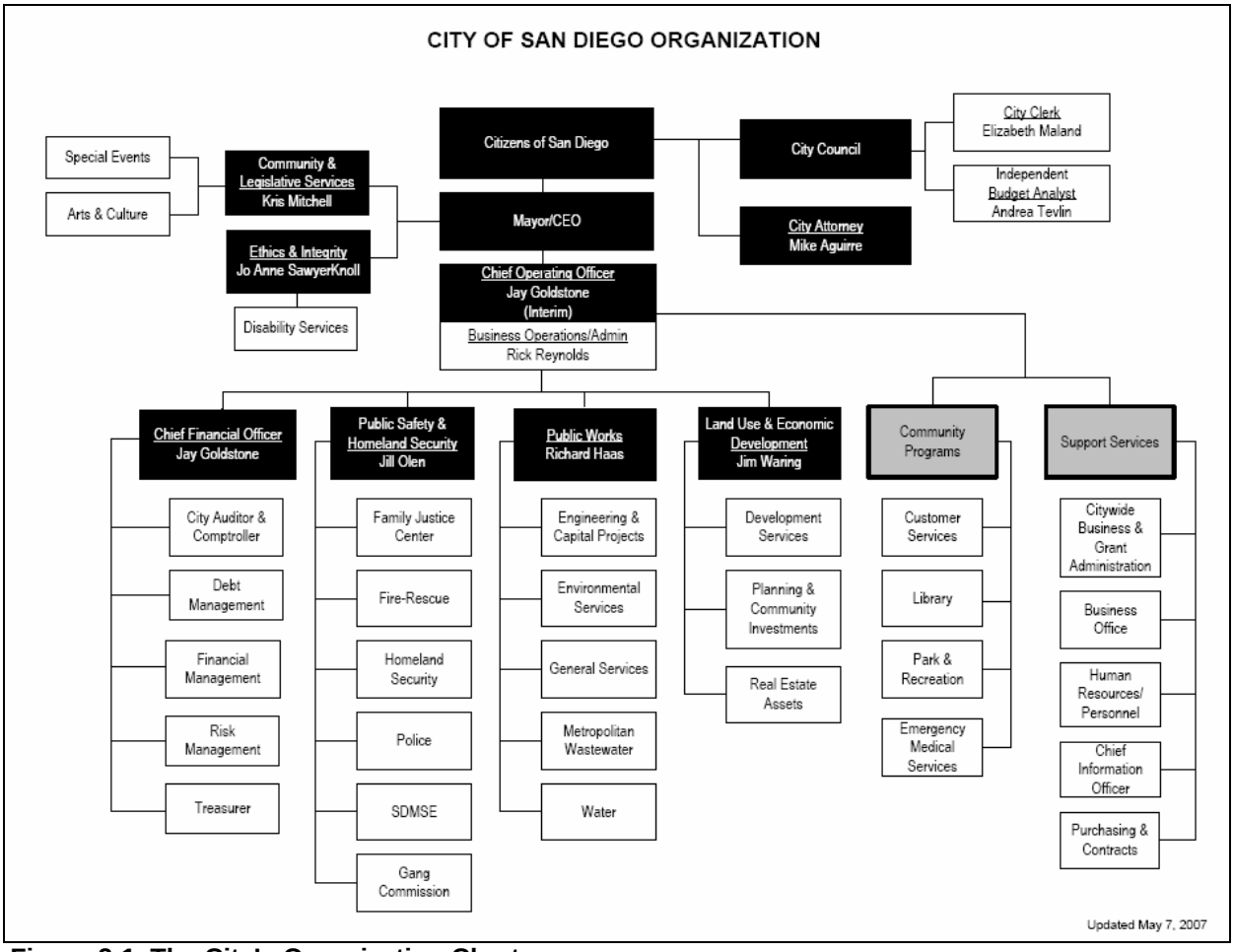

Figure 2-1. The City's Organization Chart.

In addition, the Storm Water Pollution Prevention Division in the General Services Department is the lead office for the City's efforts to reduce pollutants in urban runoff

[1] Because of Business Process Reengineering at the City, the organization chart may change in the upcoming fiscal years. The Storm Water Pollution Prevention Division will update the chart through the annual reporting process.

and storm water to the maximum extent practicable, and in overseeing compliance with the Municipal Permit (See Figure 2-2).

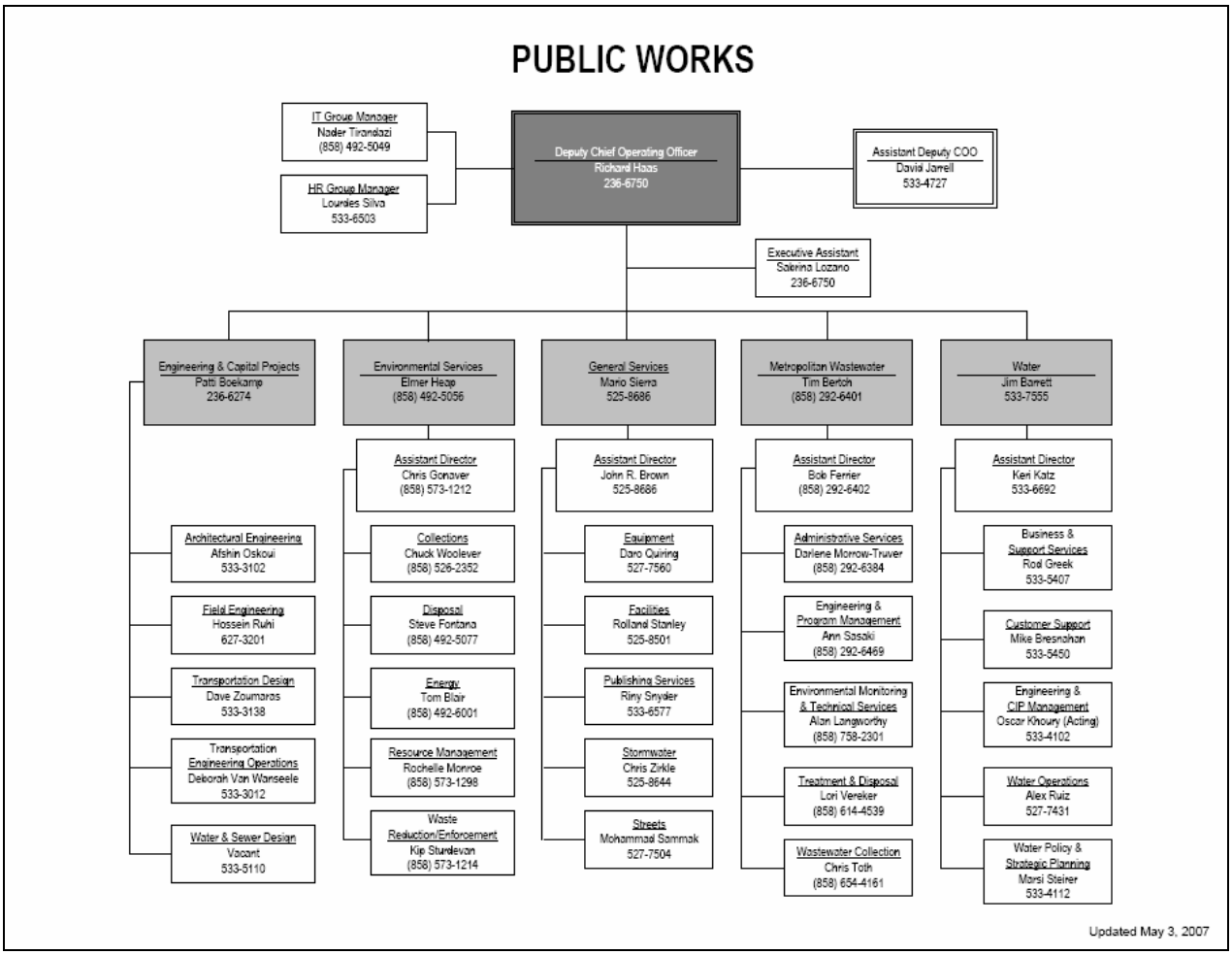

Figure 2-2. Public Works organization chart.

The Municipal Permit (Order No. R9-2007-001, "Municipal Permit," see Appendix requires that City departments that could potentially impact storm water quality through their activities identify and implement BMPs to the maximum extent practicable. The goal for all departments is zero pollutant discharge to the storm drain system or receiving waters.

Table 2-1 indicates which departments have primary or supporting BMP responsibilities according to each of the sections of this URMP document. Every department has a "home base" section in which their primary BMP responsibilities and administrative requirements (e.g., annual reporting requirements) are included. In addition, many departments share the same secondary responsibilities. To avoid repetition in the document, departments are referred to certain activity-specific BMPs outside their primary chapter.

Table 2-1. Department Roles and Responsibilities.

Note: "P" = Primary responsibility "S" = Supporting responsibility	Storm Water Pollution Prevention	Police	Environmental Services	Park & Recreation	Metropolitan Wastewater	Qualcomm Stadium	Street	Community Service Centers	Homeless Services	Special Events	IT&C	Library	Purchasing and Contracting	Treasurers	Parking Meter Services	Water	Fire-Rescue	Planning	Econ Development/ Redevelopment Agency	Fleet Services	Real Estate Assets	Facilities Maintenance	Development Services	Engineering & Capital Projects	City Attorney's Office
2.0 Administrative And Legal Procedures	S																								P
3.0 Non-Stormwater Discharges	P																								
4.0 Development Planning Component																									
4.2 Land Use Planning	S																	P							
4.3 Environmental Review Process																							P		
4.4 Development Project Approval and Verification Process	S																						P[2]	P[3]	
5.0 Construction Component	S				S		S									S	S						P	P	
6.0 Municipal Section																									
6.2 Airports	S																				P				
6.3 Buildings/Parking/Landscaping	S	S	S		S	S	S	P	P			P	P		P	S	S		P	S	S	P			
6.4 City-Owned Leased Properties	S		P																						
6.5 Household Hazardous Waste	S			P																					
6.6 Non-Emergency Fire-Rescue Activities	S				P																				
6.7 Non-Emergency Police Activities	S				P																				
6.8 Metropolitan Wastewater Collection	S					P																			
6.9 Metropolitan Wastewater	S																				P				

[2] Private Projects
[3] Public Projects

Note: "P" = Primary responsibility "S" = Supporting responsibility	Storm Water Pollution Prevention	Police	Environmental Services	Park & Recreation	Metropolitan Wastewater	Qualcomm Stadium	Street	Community Service Centers	Homeless Services	Special Events	IT&C	Library	Purchasing and Contracting	Treasurers	Parking Meter Services	Water	Fire-Rescue	Planning	Econ Development/ Redevelopment Agency	Fleet Services	Real Estate Assets	Facilities Maintenance	Development Services	Engineering & Capital Projects	City Attorney's Office
Treatment and Maintenance																									
6.10 Recreational Lands and Facilities	S						P																		
6.11 Solid Waste Management	S	S	S	S	S	S	S				P	S				S	S			P		S			
6.12 Special Events	S															P									
6.13 Stadium	S			P		P				P															
6.14 Streets/Storm Drain Conveyance System	S		P																						
6.15 Vehicle Maintenance/Operations Yards	S	P																							
6.16 Water Systems	S																P								
7.0 Industrial And Commercial Component	P																								
8.0 Residential Component	P																								
9.0 Illicit Discharge Detection And Elimination Component	P	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	P
10.0 Education Component	P																								
11.0 Public Participation Component	P																								
12.0 Fiscal Analysis Component	P	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S
13.0 Effectiveness Assessment Component	P	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S	S

2.2 Legal Authority

2.2.1 Certification of Legal Authority

The City of San Diego has the legal authority to implement the requirements of the Municipal Permit as stated in the “Signed URMP Certification” located at the beginning of this document. Enforcement, appeal, and administrative order/injunction processes are described in Section 9.0, “Illicit Discharge Detection and Elimination” and in the Stormwater Management and Discharge Control Ordinance (“Stormwater Ordinance,” see Appendix II).

3.0 Non-Storm Water Discharges

Appendix II contains a copy of the San Diego Stormwater Management and Discharge Control Ordinance ("Storm Water Ordinance") §43.03 et seq., which includes listed prohibited discharges, allowable discharges, fines, storm water Best Management Practice (BMP) requirements, definitions, and other regulatory provisions.

3.1 Storm Water Discharge Categories

The City of San Diego has determined that none of the categories of non-storm water discharges identified in Section B-2 of the Municipal Permit (listed below) are significant sources of pollutants to waters of the U.S., and are identified as allowable non-storm water discharge categories listed in Storm Water Ordinance §43.0305 (see Appendix II).
.
Allowable Non-Storm Water Discharge Categories:

a. Diverted stream flows;
b. Rising ground waters;
c. Uncontaminated ground water infiltration [as defined at 40 CFR 35.2005(20)] to MS4s;
d. Uncontaminated pumped ground water;
e. Foundation drains;
f. Springs;
g. Water from crawl space pumps;
h. Footing drains;
i. Air conditioning condensation;
j. Flows from riparian habitats and wetlands;
k. Water line flushing;
l. Landscape irrigation;
m. Discharges from potable water sources not subject to NPDES Permit No. CAG679001, other than water main breaks;
n. Irrigation water;
o. Lawn watering;
p. Individual residential car washing; and
q. Dechlorinated swimming pool discharges.

3.2 Prohibited Non-storm Water Discharge Categories

As stated in Storm Water Ordinance §43.0304 (see Appendix I), it is unlawful for any person to discharge non–storm water to the storm drain system except as provided in §43.0305 (see list in 3.1). None of the categories identified in Section B-2 of the Municipal Permit and listed in section 3.1 above are prohibited since the City has determined these are not significant sources of pollutants.

3.3 Control Measures for Non-prohibited Non-storm Water Discharges

There are no best management practices identified for allowable non-storm water discharges in Section 3.1 above because they are not considered to be a significant source of pollution at this time.

3.4 Program for Non-emergency Fire Fighting Flows

This program is described in section 6.6, “Non-Emergency Fire-Rescue Activities.”

4.0 Development Planning Component

4.1 Introduction

The goal of this section is to reduce the impacts of new development and redevelopment in the City of San Diego on water quality in the San Diego region. This section is primarily applicable to the City Planning and Community Investment Department (CPCI), Development Services Department, Engineering and Capital Projects Department, and the Storm Water Pollution Prevention Division.

4.2 Land Use Planning

4.2.1 Background

The goal of the Land Use Planning Section is to reduce the impacts of new development and redevelopment on storm water quality in the City by incorporating water quality and watershed protection principles into the City's land use planning policies. This Section is applicable to the CPCI.

The City's program must meet the requirements of the Municipal Storm Water Permit ("Municipal Permit", Order R9-2007-0001, see Appendix I), as described in Table 4-1.

Table 4-1. Municipal Permit requirements – Land Use Planning.

URMP Section	Municipal Permit Section	Requirement (Summary)
4.2.3	(Pg. 16) D. 1. a.	Description of the water quality and watershed protection principles that have been or will be addressed in the Copermittee's land use planning process.
4.2.4	(Pg. 28) D.2.a	Revise General, community, and watershed plans to provide water quality and watershed protection principles.
4.2.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 46) D. 5. b. (1) (d); (Pg. 46) D.5.(2); (Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Implement and designate an educational program for all City personnel. Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

4.2.2 Best Management Practice Requirements

1. <u>General Plan Update</u>

General Plan and the City of Villages Strategy

The City of San Diego's General Plan is its constitution for development. It is the foundation upon which all land use decisions in the City are based. It expresses community vision and values, and it embodies public policy for the distribution of future land use, both public and private.

The City's General Plan addresses State of California requirements through the following ten elements: Land Use and Community Planning; Mobility; Economic Prosperity; Public Facilities; Services and Safety; Urban Design; Recreation; Historic Preservation; Conservation; Noise; and Housing.

The City of Villages strategy is a "smart growth" sub-component and incentive program under the General Plan. The goal is to direct compact growth in limited areas that are served by transit and is, in itself, a conservation strategy. The City of Villages strategy promotes efficient use of urban land that reduces the need to develop outlying areas and creates an urban form where transit, walking, and bicycling are more viable alternatives to automobile travel. Reducing dependence on automobiles reduces vehicle miles traveled, which, in turn, lowers greenhouse gas emissions. Additionally, it improves water quality by decreasing automobile-related oil and gas leaks and atmospheric deposition of heavy metals that pollute water bodies throughout the region.

Planning Division staff, with assistance from Storm Water Pollution Prevention Division staff, has incorporated water quality and watershed protection principles into the "Urban Runoff Management" section within the Conservation Element, as well as the "Storm Water Infrastructure" within the Public Facilities element of the General Plan. The following general policy recommendations address water quality and watershed protection:

<u>Water Quality Improvement Policies in the General Plan</u>

- Develop and employ Master Drainage Plans for the City's watersheds to foster a comprehensive approach to storm water infrastructure improvements.

- Identify partnerships and collaborative efforts to sponsor and coordinate pollution prevention BMPs that benefit storm water infrastructure maintenance and improvements.

- Continue to develop and implement public education programs.
- Apply water quality protection measures to land development projects during project design, permitting, construction, and operations in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows, and the contamination of storm water runoff.

- Require contractors for all projects to comply with storm water pollution prevention planning practices in the City's Storm Water Standards[1] (see Appendix IX).

- Continue to participate in the development and implementation of Watershed Management Plans for water quality and habitat protection.

- Assure that City departments continue to use best management practices (BMPs) procedures so that water quality objectives are routinely implemented.

- Continue to encourage "Pollution Prevention" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system.

- Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.

- Ensure that all storm drain systems, structures, and maintenance practices are consistent with federal Clean Water Act and California Regional Water Quality Control Board NPDES Permit standards.

- Install infrastructure that, where feasible, includes components to capture, minimize, and prevent pollutants in urban runoff from reaching receiving waters and potable water supplies.

- Meet, and preferably exceed, regulatory mandates to protect water quality in a cost-effective manner monitored through performance measures.

- Identify and implement BMPs for projects that repair, replace, extend or otherwise affect the storm drain system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring.

2. Multiple Species Conservation Program

The Multiple Species Conservation Program (MSCP) is a regional effort between local jurisdictions, federal, and state agencies to develop a comprehensive habitat conservation planning program. It addresses multiple species habitat needs and the preservation of native vegetation communities in southwestern San Diego County. The City of San Diego MSCP Subarea Plan has been prepared pursuant to the overall MSCP guidelines to address habitat conservation goals within the City boundaries.

[1] See http://www.sandiego.gov/development-services/news/pdf/stormwatermanual.pdf

The Multiple Habitat Planning Area (MHPA) identifies areas of the City's subarea within which conservation of habitat areas and linkages will occur in addition to limited development. In association with management of MHPA lands, the City MSCP Subarea Plan contains guidelines for minimizing impacts of urban development on upland and wetland ecosystems and water quality. All developments proposed adjacent to the MHPA must conform to the Land Use Adjacency Guidelines of the City MSCP Subarea Plan, which require that all new and proposed parking lots and developed areas in and adjacent to the MHPA must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment. The MSCP recommends that potential impacts can be minimized through the use of a variety of measures including natural detention basins, grass swales or mechanical trapping devices. The MSCP also requires that these systems are maintained routinely throughout the life of a project.

The City MSCP Subarea Plan also requires that land uses, such as recreation and agriculture, that use chemicals or generate potentially toxic byproducts incorporate storm water BMPs to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Where applicable, the requirement to minimize impacts to water quality is also incorporated into leases on publicly-owned property as leases come up for renewal.

The City MSCP Subarea Plan provides specific management directives requiring that restoration of native riparian habitat take place within many of the important drainage systems and watersheds within the City. For example, the portion of the Los Peñasquitos Watershed located within the City of San Diego is addressed in the City MSCP Subarea Plan. Major drainages within the Los Peñasquitos watershed including Los Peñasquitos Canyon, Lopez Canyon, Carmel Creek, and portions of Carroll Canyon are located within the MHPA. The guidelines and Specific Management Policies of the City MSCP Subarea Plan require that enhancement of these drainages take place, where appropriate. The Subarea Plan also requires restoration and enhancement of native riparian lands within the Otay River Valley, Tijuana River Valley, and several smaller urban canyons within the central and southern portions of the City. Many of these drainages are surrounded by urban development and restoration of native riparian areas is intended to minimize impacts from urban runoff to receiving waters as well as provide habitat for animal and plant species.

4.2.3 Program Implementation

The implementation of the General Plan and MSCP storm water policies described in 4.2.3 is the responsibility of City staff who oversee the development project environmental review, approval, and verification processes (see Sections 4.3 and 4.4).

Updates to the General Plan and MSCP occur periodically and are the responsibility of CPCI staff, along with support and input from the Storm Water Pollution Prevention

Division and participating stakeholders. Storm water public outreach and annual reporting activities performed by the CPCI staff are covered in Sections 4.5 and 4.6.

4.3 Environmental Review Process

This section is applicable to the Development Services Department (DSD), which is responsible for administering the environmental review process on all (public and private) development projects within the City. With the adoption of the City's Standard Urban Storm Water Mitigation Plan (SUSMP) in 2002, there are new storm water requirements to implement one or a combination of storm water BMPs including, 1) Low Impact Development BMPs, 2) source control BMPs, and 3) structural treatment BMPs. For this section, the term "development" refers to any project that requires construction permits, development permits/approvals, and subdivision approvals from the City of San Diego.

The Environmental Analysis Section (EAS) in the Development Services Department is responsible for using the California Environmental Quality Act (CEQA) Initial Study checklist and consultation with other project review staff to identify projects that may result in water quality impacts during and/or after construction. EAS reviews proposed projects subject to environmental review under CEQA, including City capital improvement projects, to independently determine where proposed projects may have potentially significant impacts on the environment. To assist in identifying appropriate measures to mitigate potentially significant storm water quality impacts to below a level of significance, EAS staff consults with DSD engineering staff to determine what storm water BMP requirements have been identified by engineering staff. DSD Engineering staff reviews and approves the storm water BMPs that are proposed by project applicants.

4.4 Development Project Approval and Verification Process

4.4.1 Background

The City of San Diego's Storm Water Standards are published in the Land Development Manual and enforceable via the San Diego Stormwater Management and Discharge Control Ordinance ("Storm Water Ordinance") Sections 43.03 and 142.02. The standards require new development and redevelopment projects to incorporate into project plans and permit conditions the necessary storm water BMPs to control storm water pollution during construction and throughout the use of a developed site prior to issuance of any applicable discretionary (development permits/approvals, subdivision approvals or policy approvals) or ministerial (construction permits and some subdivision approvals) permits. The post-construction, or "permanent" BMPs that are required are site-specific and vary based on the project's potential impact to storm water and receiving waters.

The City's program must meet the requirements of the Municipal Permit, as described in Table 4-3.

Table 4-3. Municipal Permit Requirements – Development Project Approval and Verification Process.

Section	Municipal Permit Section	Requirement (Summary)
4.4.1	(Pg. 28) D.1.h	Enforcement of development sites (ordinance basis for authority)
4.4.3	(Pg. 16) D.1c; (Pg. 17) D.1.d (4-7)	Permanent BMP requirements for all sites (Priority Development Projects and Standard Projects)
4.4.4.1	(Pg. 16) D.1.c	Public project (CIP) approval process
4.4.4.2	(Pg. 16) D.1.c	Private project approval process
4.4.4.3	(Pg. 17) D.1.d	Model and local SUSMP updates
4.4.4.4	(Pg. 24) D.1.e	Treatment control BMP maintenance tracking
4.4.4.5	(Pg. 25) D.1.f	Inspection and enforcement of BMPs
4.4.4.6	(Pg. 25) D.1.g	Collaboration on developing a Hydromodification Management Plan and interim criteria.
4.6 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

4.4.2 Source Characterization

Chapter III of the Storm Water Standards identifies the anticipated pollutant from different land use types. Furthermore, the Storm Water Standards Manual identifies categories of project types that are likely to generate significant pollutants. The definition of Priority Projects was updated in Chapter III of the Storm Water Standards to conform to the new Municipal Permit's section D.1.d(2). The Storm Water Standards requires priority projects to identify the pollutants of concern in receiving waters and requires that priority projects identify conditions of concern such as topography, site soils and vegetation conditions, percent impervious area among others.

4.4.3 Best Management Practices Requirements

The Storm Water BMP Performance Standards as described in Chapter III of the Storm Water Standards are applicable for all projects including standard and priority projects within the City. These performance standards have been updated to ensure compliance with the BMP implementation requirements described in Municipal Permit section D.1.d (4-7) for priority development projects. The update to BMP performance standards included updates to SUSMP requirements such as the addition of low-impact development (LID) BMPs, and updates to source control and treatment control BMPs. Other updates included revision to the downstream erosion criteria for priority development projects to include interim hydromodification criteria, as required in Municipal Permit section D.1.g(6), and updates to infiltration and groundwater

protection restrictions on the use of treatment control BMPs that are designed to primarily function as infiltration devices, to conform with new requirements in Municipal Permit section D.1.d(12).

4.4.4 Program Implementation

In December 2002, the City began implementation of the Storm Water Standards for both private and public projects. To help simplify the process (and thereby improve the implementation of the requirements), all of the City's storm water-related requirements for land development projects are included in the Storm Water Standards. As an implementation manual to the City's Storm Water Ordinance, the Storm Water Standards benefits from the unique position of being fully enforceable and "updateable" as new innovations occur or state construction or permanent BMP requirements change. During the project planning and design review phase of development, the permanent and construction BMP requirements in the Storm Water Standards are applied to development projects as further described below.

4.4.2.1 Public Construction Project CIP Approval Process

ECP is responsible for planning, design and construction of all capital improvement projects. All project managers of capital improvements program (CIP) projects are required to incorporate the applicable permanent BMP requirements set forth in the Storm Water Standards into the project (specifications and plans) during the design and contract award phases to ensure that storm water BMPs have been sufficiently incorporated into the project's permanent design. To assist project managers, storm water language was included in the CIP contract document (boilerplate) specifications along with standard drawing details. Drawings are routed internally (within the design sections) as part of a process termed "peer plan check" for a check on water quality design measures. Revisions are made to the design and then the project is routed to the Storm Water Division staff for a more detailed and formal review. If permanent treatment BMPs are required, the design is discussed and coordinated with the department that will be maintaining the permanent BMP facility after it is built. This phase of the project is being completed at about the 75% or 90% design levels. The drawings are simultaneously routed to the Field Engineering Division of the ECP for a constructability review. All ensuing comments are routed back to the project managers for revision prior to City Manager (Mayor) or Council approval and the advertisement of the contract documents.

The design drawings go through City-wide plans check at multiple milestones prior to design completion. As to the storm water runoff reviews, the project managers are required to fill out the storm water requirement applicability checklist (Form DS 560) when they submit the project for environmental review at 30% design. At the 90% design level, the project managers are required to fill out a certification form for the Storm Water Pollution Prevention Program. It is required that this form be signed by a registered civil engineer.

The mandatory review by the Storm Water Division provides review of CIP projects for compliance with the City's Storm Water Standards. In addition to the plans, the Storm Water Division's engineering review staff often reviews Water Quality Technical Reports (WQTR), Storm Water Pollution Prevention Plans (SWPPP), and Water Pollution Control Plans (WPCP), and Water Quality Studies. A Water Quality Study is required for standard projects. It documents the applicant's consideration of site design and source control BMPs for a proposed project. After each review, a memo is sent to the City project manager informing him or her whether or not the project has met the requirements of the City's Storm Water Standards and, if needed, what additional documents, plan revisions, etc. are required in order for those requirements to be met.

4.4.4.2 Private Development Construction Project Approval Process

Conceptual permanent BMPs are reviewed by DSD for conformance with the Storm Water Standards during discretionary review, and reviewed in greater detail during ministerial review. Conceptual BMPs accepted as part of discretionary review are enforced during ministerial review. The Storm Water Applicability Checklist is a submittal requirement for both discretionary and ministerial permit applications. A Water Quality Technical Report is required for all Priority Development Projects.

4.4.4.3 Model and Local SUSMP updates

The regional Model SUSMP identifies specific post-construction site design, source control and treatment control storm water BMPs that must be implemented on land development projects that meet the criteria for definition of a priority development project. These SUSMP requirements are adopted locally through updates to the Storm Water Standards.

The City of San Diego has cooperated with the other Copermittees to update the regional Model SUSMP, as required by Municipal Permit section D.1.d(8)(a). The updated Model SUSMP will be submitted to the San Diego Regional Water Control Board (Regional Board) by June 2008, as required in Municipal Permit section D.1.d(8)(b). Within 365 days of the Regional Board acceptance of the updated Model SUSMP, the updated requirements will be adopted locally via revisions to the Storm Water Standards.

4.4.4.4 Treatment Control BMP Maintenance Tracking

A watershed-based database has been implemented to track and inventory treatment control BMPs and maintenance within the jurisdiction. DSD and ECP annually provide an updated inventory of approved treatment control BMPs. The database will be used to verify that treatment control BMPs are regularly maintained by the parties responsible. The Storm Water Pollution Prevention Division runs and maintains the inspection program. All treatment control BMPs will be prioritized based on its treatment efficiency; the BMP priority will determine the inspection frequency. All drainage insert treatment control BMPs have a medium prioritization at a minimum. All of the treatment

control BMPs that have a high priority ranking are inspected on an annual basis. At least 50% of projects with drainage insert treatment control BMPs are inspected annually. At a minimum, 20% of all approved treatment control BMPs are inspected annually and a maximum of 200% of the average number of projects with treatment control BMPs approved per year are inspected annually. Non-complaint sites will be reinspected or elevated to enforcement action. The City of San Diego's Code Compliance Officers have authority to issue citations and civil penalties to entities that are not effectively managing storm water pollutants (see Component 9, "Illicit Discharge Detection and Elimination." Table 4-4 summarizes the inspection frequencies.

Table 4-4. Treatment Control BMP Inspection Frequency.

BMP Prioritization	Inspection Frequency	Percentage of BMPs Inspected
Approved Treatment Control BMPs	Annually	Minimum 20%
High	Annually	100%
Medium-drainage inserts	Annually	50% of drainage inserts
Medium	As needed	NA
Low	As needed	NA

4.4.4.5 Inspection and Enforcement of BMPs

Resident Engineers in the Field Engineering Division inspect the construction and installation of BMPs that are associated with engineering permits (grading permits and public improvement permits) and CIP projects. The Resident Engineers ensure that the project is in compliance with the discharge permit and the storm water ordinances. Inspections are also conducted by private Construction Management firms hired by the City to supplement staff. For CIPs that are priority development projects, enforcement will be withholding operational acceptance or notification of completion until it is verified that post-construction BMPs are installed.

Building Inspectors in DSD inspect the construction and installation of construction and permanent BMPs that are associated with private development that requires a demolition or building permit. For priority development projects that are private developments, the Certificate of Occupancy will not be issued unless the BMPs have been inspected and signed off.

4.4.4.6 Hydromodification

The City participated in the Copermittee Workgroup responsible for establishing interim Hydromodification Management Plan (HMP) criteria that was implemented in January 2008, and a HMP that will be submitted to the Regional Water Quality Control Board for review in January 2009. After the Regional Board approves the HMP, the City will have 180 days to incorporate the requirements into the Storm Water Standards.

4.5 Education and Training

Section 4.5 is applicable to CPCI, DSD, and ECP.

The Municipal Permit identifies five target communities to receive education using all media as appropriate.

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, “Education.”

4.5.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

4.5.2 Activity-Specific Training

Municipal Departments

This section describes activity-specific trainings provided by DSD and ECP. These departments will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 4-5. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 4-5. Activity-specific BMP Training(s) Provided by DSD and ECP.

Training Module/Item	Staff Level	Available
DSD		
1. staff meetings to discuss storm water requirements such as Federal, state and local water quality laws; connection between land use decisions and water quality; LID BMP requirements; and methods to minimize impacts to receiving waters from development	All	ongoing
2. educate staff and ensure that the in-house standards for the review of WQTRs are followed	All	ongoing
Field Engineering Division		
3. Storm water activity-specific training before the start of the wet weather seasons	Resident Engineers	As needed
4. Storm water topics are discussed at the monthly meeting of resident engineers	Resident Engineers	As needed

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

4.5.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by CPCI, DSD, and ECP in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 4-6 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 4-6. Department External Outreach Activities by Target Audience.

Dept Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and	Available

	School Children 5. Under-represented audiences in 1-4	
City Planning and Community Development		
Storm Water related information on Department Web site	1,4	ongoing
Storm Water Pollution Prevention Division materials in business licenses and renewals.	2,3	ongoing
DSD		
Distribute *Standard Urban Storm Water Mitigation Plan* Fact Sheet	1	ongoing
Distribute *Grading: Doing It Right* brochures and video which provides information about proper storm water pollution prevention practices. These resources were provided to the public and aired regularly on City TV 24.	1-5	ongoing
Construction poster and brochure promoting proper storm water pollution prevention practices at construction sites.	1	ongoing
"Development Process: Step-by-Step" web site, which references both the *Storm Water Applicability Checklist* as well as the *Storm Water Standards*.	1	ongoing
New section of the DSD web site focusing on grading which includes visual examples and a "Frequently Asked Questions" page.	1	ongoing
Holds quarterly coordination meetings with the construction industry with water quality as a standing topic.	1	ongoing
DSD (Building Inspection)		
Provides individualized training to construction industry members on proper storm water pollution prevention and BMP techniques.	2	ongoing

** Note the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.*

4.6 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by CPCI, DSD, and ECP to track expenditures for designing, developing, and implementing BMPs and educational activities. The departments' annual report information will be submitted in one report to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

5.0 Construction Section

5.1 Introduction

The goal of this section is to reduce or eliminate pollutants from entering into the City's storm drain system or receiving waters due to construction activities. Storm water requirements are contained in the San Diego Municipal Code (clerkdoc.sannet.gov/Website/mc/mc.html) as follows:

Chapter 4 Article 3 Division 3 – Storm Water Management and Discharge Control
Chapter 14 Article 2 Division 1 – Grading Regulations
Chapter 14 Article 2 Division 2 – Drainage Regulations

Referenced in the Municipal Code is the Land Development Manual which includes the Storm Water Standards (http://www.sandiego.gov/development-services/news/pdf/stormwatermanual.pdf). The Storm Water Standards Manual contains the City's construction BMP requirements.

All City departments responsible for inspecting construction projects are responsible for ensuring that adequate storm water BMPs are installed and maintained by the owner or contractor. The Field Engineering Division in the Engineering and Capital Projects Department is the primary department responsible for inspecting grading permits, and the Inspection Services Division in the Development Services Department is primarily responsible for inspecting building permits. The Storm Water Pollution Prevention Division assists these departments in implementing the storm water requirements contained in section D.2 of the Municipal Storm Water Permit (Order No.R9-2007-0001, "Municipal Permit", see Appendix I), as described in Table 5-1.

Table 5-1. Municipal Permit Requirements – Construction.

URMP Section	Municipal Permit Section	Requirement (Summary)
5.2.1	(Pg. 29) D. 2. b	Maintain, and update monthly, an inventory of construction sites.
5.3	(Pg. 28) D. 2. a	Update ordinances
5.4	(Pg. 29) D. 2. c	BMP Requirements
5.5.1	(Pg 29) D. 2. a	Ensuring construction requirements through the project authorization or approval process
5.5.2	(Pg. 30) D. 2. d	Site inspection process and frequency of inspections.
5.5.3	(Pg. 32) D. 2. e	Enforcement of construction sites
5.5.4	(Pg. 32) D. 2. f (1)(b,d)	When San Diego Regional Water Quality Control Board ("Regional Board") notification is required
5.5.5	(Pg. 45) D. 5. (b, d); (Pg. 61) J.1.a. (1) (i)	Implement and designate an educational program for all City personnel.

URMP Section	Municipal Permit Section	Requirement (Summary)
5.5.6 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

5.2 Source Characterization

Construction sites include any site where an activity such as grading, excavation, clearing, structure and road construction, or demolition results in a disturbance of soil. Sources identified by the City of San Diego include: City-issued Construction Permits, and Capital Improvement Program (CIP) projects.

5.2.1 Site Inventory

A watershed-based inventory of construction sites is updated monthly as required by Municipal Permit Section D.2.b. The Engineering and Capital Projects Department (ECP) Field Engineering Division and the Development Services Department (DSD) individually maintain the inventory of construction sites that are under their inspection domain. The current inventory is provided as Appendix VI, "Construction Project Inventory."

5.2.2 Inventory Updates

Updates to the construction site inventory are managed by the DSD and the ECP Field Engineering Division as described below.

5.2.2.1 Development Services Department Process for Inventory Updates

DSD maintains an inventory of construction permits in the Project Tracking System (PTS). This is updated as new permits are issued and when permits are closed out. The building inspectors also provide updates to this inventory based on inspection of sites. The two departments provide Storm Water Pollution Prevention Division verification of updates inventory on a monthly basis.

5.2.2.2 Field Engineering Process for Inventory Updates

The project managers in the ECP maintain an inventory of CIP projects that are in construction using the "CityWorks" program. The supervisors at the Field Engineering Division maintain a paper inventory that contains the most current information on when

a site was last inspected and the current construction status including priority adjustments. This paper record is updated through weekly reports from the Resident Engineers and the information is routinely transferred into a reporting spreadsheet.

5.3 Ordinance Updates

Construction sites are required by the Storm Water Ordinance to conform to the Construction Storm Water best management practices (BMP) Performance Standards described in Chapter IV of the Storm Water Standards. These standards are updated when needed to ensure effectiveness and compliance with current Regional Board requirements. Updates to these standards are described in the following section.

5.4 Best Management Practices Requirements

The Construction Storm Water BMP Performance Standards described in Chapter IV of the Storm Water Standards are applicable to all construction sites within the jurisdiction. These performance standards have been updated to ensure compliance with the BMP implementation requirements described in Municipal Permit section D.2.c, and include requirements specific to the wet and dry season, and protective measures for rain events that occur in the dry season.

5.4.1 Updated BMP Requirements

Chapter IV of the Storm Water Standards provides a listing of the minimum BMPs for both general site management, erosion, and sediment controls, as required in Municipal Permit section D.2.a(2).

5.4.2 Additional Controls for Construction Sites

To ensure compliance with Municipal Permit section D.2.c(4), Chapter IV of the Storm Water Standards has been updated to include additional controls for construction sites that are located such that they could result in a discharge of sediment directly to 303(d) listed water bodies impaired for sediment, coastal lagoons, and water bodies on environmentally sensitive lands.

5.4.3 Maximum Disturbed Area for Erosion Controls

To ensure compliance with Municipal Permit section D.2.c(1)(a)vi, Chapter IV of the Storm Water Standards has been updated to specify the maximum size of disturbed area that can be created at a grading site prior to implementation of erosion controls. The updated standards also outline conditions in which an increase to the maximum disturbed area may be allowed.

5.4.4 Advanced Treatment Methods

To ensure compliance with Municipal Permit section D.2.c(2), Chapter IV of the Storm Water Standards has been updated to specify what conditions will trigger a requirement to implement advanced treatment for sediment using factors described in the Municipal Permit.

5.5 Program Implementation

5.5.1 Authorization Prior to Construction of Capital Improvement Program Projects

ECP is responsible for planning, design and construction of all of the City's CIP projects. All project managers of CIP projects are required to incorporate the construction requirements set forth in the Storm Water Standards Manual. These requirements must be incorporated into the project specifications and plans prior to approval in order to fund the construction of the project. To assist project managers in assuring consistency, storm water language is included in the boilerplate CIP Standard Specifications. Standard drawings are used in conjunction with project specific drawings where appropriate. Drawings are routed internally (within the design sections) as a "peer plan check" to ensure adequate inclusion of construction BMP measures. Additional details on the City's process of conditioning CIP projects prior to approval of construction funds is provided in Chapter 4.

5.5.2 Construction and Grading Approval Process for Private Projects

DSD is responsible for reviewing construction and development projects for private development in the City of San Diego. Projects are reviewed by DSD staff to ensure conformance to Chapter IV of the Storm Water Standards prior to issuance of any construction permits. All projects are required to incorporate construction BMPs on the plans and in the appropriate construction storm water plan (Water Pollution Control Plans for projects that are not subject to the State Construction National Pollutant Discharge Elimination System (NPDES) Permit, and Storm Water Pollution Prevention Plans for projects that are subject to the State Construction NPDES permit). The review staff also verifies enrollment under the statewide General NPDES permit for Construction.

5.5.2 Site Inspection Process and Frequency

Inspections performed by the City (by City staff or Construction Management (CM) firms managed by the City) provide verification that each site is in conformance to Chapter IV of the Storm Water Standards. The inspections are tracked to ensure that inspections meet the minimum inspection frequencies provided in the table below. Definitions for site priority are found in the Storm Water Standards.

Site Priority	Wet Season	Dry Season
High Priority - Active	Bi-weekly	As-Needed
High Priority - Inactive	Bi-weekly	As-Needed
Medium Priority	Monthly	As-Needed
Low Priority	As-Needed	As-Needed

As required by Municipal Permit section D.2.d(6), all inspections at a minimum include:

a. A check for coverage under the General Construction Permit (Notice of Intent (NOI) and/or Waste Discharge Identification No.) during initial inspections;
b. Assessment of compliance with the Construction Storm Water BMP Performance Standards located in Chapter IV of the City of San Diego Storm Water Standards (and enforceable by San Diego Stormwater Management and Discharge Control Ordinance ("Storm Water Ordinance") Section 43.04, et seq.);
c. Assessment of BMP effectiveness;
d. Visual observations for non-storm water discharges, potential illicit connections, and potential discharge of pollutants in storm water runoff;
e. Education and outreach on storm water pollution prevention, as needed, and
f. Creation of a written inspection report.

To ensure compliance with Municipal Permit section D.2.d (7), the inspection supervisors oversee the tracking of storm water inspections to ensure that the minimum frequencies are met. The inspection supervisors also maintain records necessary to ensure compliance with all of the reporting requirements located in Municipal Permit section J.3.a(3)(b).

5.5.2.1 Field Engineering Division's Process for Construction Site Inspections

Resident Engineers in the Field Engineering Division inspect BMPs associated with engineering permits and CIP projects. Inspections of BMPs are also performed by CM firms when hired to supplement staffing needs. Field Engineering staff manage all of the City's contracts with CM firms.

5.5.2.2 Development Services Department's Process for Construction Site Inspections

DSD inspects building sites routinely for compliance with storm water requirements. Inspectors are assigned to a district and are responsible for monitoring projects in that area. Each inspector routinely monitors his/her district on a daily basis. Sites are also inspected at the request of another department or in response to complaints. A special correction notice pertaining to storm water pollution prevention measures is used by inspectors to provide immediate written notice to contractors requiring immediate correction of BMPs.

5.5.3 Enforcement of Construction Sites

All construction sites found to be not in compliance with the Construction Storm Water BMP Performance Standards are issued a notice and stronger measures as deemed necessary. The enforcement procedures followed by Field Engineering Division and the Development Services Department are outlined below.

5.5.3.1 Field Engineering Division's Enforcement Process

As the single point of contact with the contractor, the Resident Engineer is responsible for identifying any storm water issues or potential violations. If issues are not resolved through storm water notices, and violations still occur, then stop work orders are generally issued and all work is halted except those activities necessary to bring the site into compliance with storm water regulations. Stop work orders are issued based on documentation, consultation with a supervisor, and the Deputy Director's approval. A re-inspection is required to be conducted by Field Engineering Division personnel prior to lifting a stop work order.

For sites that have no activity occurring and the issuance of a stop work order would not provide sufficient influence to the contractor to remedy deficiencies, the site is referred to the Storm Water Pollution Prevention Division for enforcement during rain events or discharges.

The Field Engineering Division also coordinates with the inspectors from DSD. For example, a site that may have a grading permit for which the grading has been completed but the contractor continues to work under a building permit. Any storm water violations can be referred to DSD for further enforcement action.

5.5.3.2 Development Services Department's Enforcement Process

For egregious or repeat issues, inspectors have been trained to issue re-inspection notices, which effectively stops work on the site until the corrections are made and the site is re-inspected.

For sites that have no activity occurring and the issuance of a re-inspection notice would not provide sufficient influence to the contractor to remedy deficiencies, the site is referred to the Storm Water Pollution Prevention Division for enforcement during rain events or discharges.

The inspectors from DSD also coordinate with the inspectors from the Field Engineering Division when the currently active permit is within the Field Engineering Division's inspection domain.

5.5.4 Pollutant Discharge Notification

As required by 40 CFR Section 122.41(1)(6), when a construction manager or inspector, employed by the City or hired to represent the City, determines that a discharge poses a significant threat to water quality or human health, they will notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the construction manager or inspector to the Regional Board within five working days of the day the event was identified. The construction manager or inspector will also notify other regulatory agencies as required on Form 304.

In addition, the Regional Board will also be notified at any time that a stop work order or other high level enforcement action is taken to address a storm water violation.

5.5.5 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0 "Education."

5.5.5.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

5.5.5.2 Activity-Specific Training

Municipal Departments

This section describes activity-specific trainings provided by DSD and ECP Field Engineering Division. DSD and ECP Field Engineering Division will create, execute, and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 5-2. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 5-2. Activity-specific BMP Training(s) Provided by the DSD and ECP.

	Staff Level	Schedule
DSD		
1. Staff meetings to discuss storm water requirements such as Federal, state and local water quality laws; connection between construction activities and water quality; construction BMP requirements; and methods to minimize impacts to receiving waters from construction sites	All	ongoing
2. Educate staff and ensure that the in-house standards for the review of WQTRs are followed	All	ongoing
Field Engineering Division		
3. Storm water activity-specific annual training before the start of the wet weather season	Resident Engineers	As needed
4. Storm water topics are discussed at the monthly meeting of resident engineers	Resident Engineers	As needed

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

5.5.5.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the DSD and ECP Field Engineering Division in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 5-3 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 5-3. Department External Outreach Activities by Target Audience.

Dept Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Available
DSD		
Distribute *Standard Urban Storm Water Mitigation Plan* Fact Sheet	1	ongoing
Distribute *Grading: Doing It Right* brochures and video which provides information about proper storm water pollution prevention practices. These resources were provided to the public and aired regularly on City TV 24.	1-5	ongoing
Construction poster and brochure promoting proper storm water pollution prevention practices at construction sites.	1	ongoing
"Development Process: Step-by-Step" web site, which references both the *Storm Water Applicability Checklist* as well as the *Storm Water Standards Manual*.	1	ongoing
New section of the DSD web site focusing on grading which includes visual examples and a "Frequently Asked Questions" page.	1	ongoing
Quarterly coordination meetings with the construction industry with water quality as a standing topic.	1	ongoing
DSD (Building Inspection)		
Individualized training to construction industry members on proper storm water pollution prevention and BMP techniques.	2	ongoing

5.5.6 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget

is developed and maintained by DSD and the ECP Field Engineering Division to track expenditures for designing, developing, and implementing BMPs and educational activities. The departments' annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

6.0 Municipal Section

6.1 Introduction

The City of San Diego employs over 11,000 persons and contracts many more. Due to the City's organizational size and complexity, this chapter is organized into logical sub-sections according to City functions and services to help City departments easily understand their requirements and effectively implement the Best Management Practices (BMPs). Each section addresses a City responsibility, which can be shared by multiple departments, or just one. To help the departments track which sections apply to them, an index is provided (see Table 2-1 in Section 2.0, "Administrative and Legal Procedures"). Because of BPR reorganization of the City, some responsibilities may change in the upcoming fiscal years. The Storm Water Pollution Prevention Division will inform the San Diego Regional Water Quality Control Board (Regional Board) of these changes as they occur through the annual reporting process.

This Jurisdictional Urban Runoff Management Plan (URMP) will begin implementation on January 24, 2008. Updates to the Plan will be included in the URMP annual reports which City departments are due to submit to the Storm Water Pollution Prevention Division by July 21 of each year. It is the responsibility of each department to secure the budget for all aspects of program implementation, including: planning, implementation, construction of BMPs, maintenance of BMPs, education and training, and reporting for the URMP, as applicable.

The following are recommended steps to implement the elements of the program that apply to each department:

1) Assign Storm Water Representative(s) (Ongoing)

Each department must assign a representative within the department who will be responsible for overseeing implementation of the department's requirements, ensuring data is tracked and reported to the Storm Water Pollution Prevention Division each year, represents the department during storm water audits by the federal Environmental Protection Agency (EPA) and other agencies, and responds to storm water-related issues, such as notices of violation, that occur within the department. In addition, the Storm Water Pollution Prevention Division will be meeting with department representatives periodically throughout the fiscal year.

2) Adopt (September 2007)

The first step toward implementation is to adopt the Plan. A department head or appointing authority must accept and certify that the department will formally establish policies and procedures to implement the Plan.

3) Distribute (January 2008)

After City Council approval of the URMP in January 2008, the next step is to distribute the Plan to the affected divisions within the department with the appropriate transmittal requiring them to begin implementation. The department will make copies of the Plan (or Plan applicable sections) and distribute these to the appropriate personnel.

4) Train/ Develop Awareness (Ongoing)

The department must schedule and ensure both the General Storm Water training for all personnel, and "Activity Specific" training for those personnel engaged in activities covered by the Plan. The department must maintain records of the personnel trained so that the status of the training can be reported to the Regional Board.

5) Practice/ Implement (January 24, 2008 – January 24, 2013)

The next step is to apply the practices, policies, and procedures to daily activities within the department. Personnel should be informed that they must apply the practices that are appropriate for their activities.

6) Assessment/ Review (Ongoing, annually through reporting process)

Periodically, the department, along with the Storm Water Pollution Prevention Division, will assess and review the practices that the department has applied to its daily activities. They will record any practice that needs modification or any new practices, policies or procedures that should be adopted.

7) Update (Ongoing)

If needed, and after an assessment and review of the department's activities, the practices and guidelines may be updated by the Storm Water Pollution Prevention Division and any changes will be submitted to the department for review and co-approval. Once approved, the new guidelines must be incorporated into the department's URMP Section and policies and procedures and the appropriate employee awareness and training must be provided.

8) Report (Ongoing)

The department will need to maintain records and provide reports to the Storm Water Pollution Prevention Division. The reporting format and requirements are detailed in the applicable sections of the Plan. Departments must maintain such records as are necessary to provide the information that will be required by the Regional Board. Additionally, records of any required training should be maintained. For example, as part of the annual report, the Storm Water Pollution Prevention Division will ask for the number of employees trained for each element, among other items. The Storm Water Pollution Prevention Division will compile the reports for all City departments and prepare the annual report to the Regional Board. Departmental information for the annual report is due to the Storm Water Pollution Prevention Division by July 21st of each year. Departments are responsible for collecting information in anticipation of an

July 21st reporting deadline. The Storm Water Pollution Prevention Division will provide early notification to departments of specific reporting dates each year.

9) Inspection (Twice annually)

Two department self- inspections of municipal facilities and activities are required each year, and are important to the success of this Program. The inspections will check what practices and policies have been adopted and implemented so that the general effectiveness of the Program in instilling practices to reduce pollutants in urban runoff can be assessed. If deficiencies or ineffective procedures are identified during an inspection, departments must identify and implement corrective actions to resolve the issue. If the department determines that corrective actions cannot be implemented immediately (such as construction of a structural control), departments must identify a schedule for when the corrective actions will be implemented. Storm Water Pollution Prevention staff will be available to assist in addressing issues.

Additional voluntary self-inspections, performed by department staff, should be held as frequently as deemed necessary to assess program effectiveness and ensure proper implementation of BMPs. Occasional spot inspections by Storm Water Pollution Prevention Division staff may be made to assess each facility's compliance with Municipal Permit requirements. In addition, departments and facilities are subject to periodic inspection and/or audits by Regional Board and federal EPA staff.

The Storm Water Pollution Prevention Division will coordinate with the departments to verify the implementation of designated BMPs, and the completion of two annual inspections. The "Inspection Forms" found in Appendix XIV detail the steps used in the inspections. Enforcement of the City's Storm Water Management and Discharge Control Ordinance (Appendix II) is the responsibility of the Storm Water Pollution Prevention Division Enforcement Program.

10) Certify (Annually)

Each department will sign and return a statement of compliance along with the department's required reporting data to the Storm Water Pollution Prevention Division by July 21 of each year as part of the proof that the City is doing its part to reduce pollutants in storm water and urban runoff.

6.2 Airports

6.2.1 Background

This section is applicable to the Real Estate Assets Department, Airports Division that operates Brown Field, Montgomery Field and leased non-aviation properties. These airports serve to provide support for general aviation activities, parking, hangars and maintenance services for a variety of fixed and rotary wing aircraft. These activities inherently involve petroleum products (e.g., fuel and lubricants), products of wear (e.g., carbon, metal, rubber, etc.), and cleaning agents (e.g., solvents, soap, etc.), which could pollute storm water runoff. Fertilizers and herbicides used in the ground maintenance of the airports also may pose a hazard if not monitored properly. The Airports Division's goal is to reduce the impact on receiving waters by aircraft and ground maintenance activities. Best management practices (BMPs) have been implemented into the airport activities through inventory, inspection, education, and annual reporting requirements applicable the airport and non-aviation activities.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No.R9-2007-0001 "Municipal Permit", Appendix I), as described in Table 6.2-1.

Table 6.2-1. Municipal Permit Requirements – Airports Division.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.2.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities and potential sources of pollutants.
6.2.3	(Pg. 32-34) D. 3. a. (2,3,4,5)	Implement and maintain BMPs.
6.2.4.1	(Pg. 35) D. 3. a. (7)	Inspect municipal areas, activities and implement any necessary follow up actions.
6.2.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.2.4.3	(Pg. 45) D. 5. (b, d)	Implement and designate an educational program for all City personnel, contractors and community groups.
6.2.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.2.2 Source Characterization

The Airports Division's inventory includes the two municipal airports (see Appendix III, "Municipal Inventory"). The Division's activities, their associated potential pollutants, and designated BMPs are listed in Table 6.2-2. The Airports Division will update any

changes to its facilities inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.2.4.4, “Annual Report Form.”

6.2.3 Best Management Practices Requirements

6.2.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.2.3.1 to 6.2.3.2 below are the Airports Division’s BMPs for activities not already covered by the General Permit for the California Storm Water Monitoring Group for Airports with Industrial Activities.

If the Airports Division determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Stormwater Management and Discharge Control Ordinance (Stormwater Ordinance), the Airports Division will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, the Airports Division will provide updates to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.2.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in “Illicit Discharge Detection and Elimination.”

Additionally, the leased properties operating at the airport fields, which includes small restaurants and other businesses, are classified as Commercial/Industrial as part of the Jurisdictional Urban Runoff Management Plan (URMP). These leased properties, therefore, are subject to the Commercial/Industrial minimum BMP requirements identified in Appendix X, “Annual Report Form Questions.” Airports Division’s storm water oversight responsibilities for these leased properties are detailed in Section 6.4.3.1 and 6.4.3.2, “City Owned Leased Properties.”

6.2.3.1.1 Minimum BMPs

The Airports Division will ensure that all City staff implements the following minimum BMPs, as applicable.

1. Prior to starting activities, <u>locate storm drain system and prevent pollutants from entering.</u> Activity-specific BMPs are listed in Table 6.2-2.
2. <u>Only clean rainwater can be discharged to the storm drain system</u>. See Stormwater Ordinance Section 43.0305 “Exemptions from Discharge Prohibition” for allowable discharges.[1]
3. <u>Sweep up municipal areas after activities and/or spills</u>. Hosing down pollutants into the storm drain is prohibited by Stormwater Ordinance Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.

4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur after May 1 and before September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately the Airports Division's responsibility to prevent pollutant discharges to the storm drain system. Therefore, the Airports Division will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

The Airports Division will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix VIII, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

6.2.3.1.2 Activity-specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.2-2 will be implemented during the Airports Division's operations and maintenance activities by City employees.

Table 6.2-2. BMPs Designated for Areas and Activities at the Airports.

Activity	Potential Pollutants	Best Management Practices
Public Parking Areas (Parking lot and Curb Side Parking)	trash and debris, oil and grease	• Sweep parking lot and street curbs quarterly by a contracted street sweeping service. • Clean/empty parking lot and trash cans daily (except weekends and holidays).
Landscaping	sediments, pesticides, nutrients	• Clean trimmings or cuttings daily. • Sweep up seasonal shedding of leaves as necessary.
Landscape Irrigation	pesticides, nutrients, sediments	• Orient sprinkler heads towards vegetated areas. • Monitor sprinkler system watering and do not irrigate for long periods of time or during windy conditions. • Maintain sprinkler valves and manifolds to prevent leaking. • Repair broken sprinkler heads as necessary.
Refuse Dumpster	sediments, metals, organic, compounds trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses	• Keep lids closed on dumpsters to contain trash materials and protect from rainwater. • Replace dumpsters if they leak. • Clean trash and debris from around the dumpsters on a regular basis.
Fertilizer and Herbicide Application	organic compounds	• Do not apply fertilizers and herbicides if there is a 40% or greater chance of rain. • Only use fertilizers and herbicides s directed and apply directly to the source of intended use. • Apply herbicides based on the recommendations of a licensed Pest Control Advisor. • Conduct annual reviews of the pest control applications and conform to the current San Diego County Department of Agriculture regulations. • Perform herbicide applications by contracted services as much as possible to minimize the need to manage stored products.
Pesticide Application	pesticides	• Perform pesticide applications only by contracted licensed pesticide handlers. • Apply pesticide applications in such a manner so as to not enter into the storm drain system.
Materials Handling, Storage, and Disposal		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Loading and Unloading		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Vehicle Equipment Maintenance		• See this activity's BMPs in Table 6.15-2 Section 6.3, "Vehicle Maintenance/Operations Yards"
Vehicle and Equipment Fuel Dispensing Areas		• See this activity's BMPs in Table 6.15-2, Section 6.3, "Vehicle Maintenance/Operations Yards"

6.2.3.2 Additional Controls for Municipal Areas and Activities

The Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, the Airports Division will conduct a second facility inspection as described in detail in Section 6.2.4.1 “Facilities Inspections and Improvements.”

6.2.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.2.4.1 Facility Inspections and Improvements

The Municipal Permit requires that the City inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges Note: see Section 6.2.4.2 “Pollutant Discharge Notification” below for reporting requirements.

Also, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, the Airports Division will conduct a second facility inspection. As shown in Table 6.2-3, the first inspection will occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.2-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection the Airports Division determines that improvements to its BMPs are required, the Airports Division will perform the action (e.g., repair a structural BMP), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection. If the Airports Division determines that the modifications require additional time or funds to implement, the Airports Division will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Facility Inspection Forms are attached as Appendix XIV, "Inspection Forms" and are also located on the City's website.[2]

6.2.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by Airports Division and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Stormwater Ordinance Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When Airports Division determines that a discharge poses a significant threat to water quality or human health, Airports Division must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions

[2] http://www.sandiego.gov/thinkblue/resources/index.shtml

must be sent by the Airports Division to the Regional Board within five working days of the day the event was identified.

Airports Division will also notify other regulatory agencies as required on Form 304.

6.2.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, “Education.”

6.2.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division.

Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.2.4.3.2 Activity-specific Training

Municipal Departments

This section describes activity-specific trainings provided by the Airports Division. The Airports Division will create, execute, and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 6.2-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.2-4. Activity-specific BMP Training(s) Provided by the Airports Division.

Training Module/Item	Staff Level	Schedule
Public Parking Areas	Airport Operations Staff	ongoing
Landscaping	Airport Operations Staff	ongoing
Refuse Dumpsters	Airport Operations Staff	ongoing

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.2.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Airports Division in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.2-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.2-5. Department External Outreach Activities by Target Audience.

Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
1. Post informational signs in various locations to inform public about the proper disposal of liquids, litter and other polluting discharges that may migrate into the storm water system. Signs will notify users of potential fines.	3	Completed by 2007 with standardized City-wide signs.
2. Ensure Commercial Operating Permits (COPs)	3	Current COPs are

Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
contain language to inform permittees of the regulations from the City Airports and other controlling agencies concerning acceptable activities and their associated BMPs. Permittees will be notified of any potential fines for failing to comply with the regulations.		issued with BMPs regarding their activity on the airport.
3. Send informational material to tenants and lessees of the Airport policies regarding the Storm Water Pollution Prevention Plan (SWPPP) and the City's regulatory compliance expectations.	3	Currently in effect with SWPPP Industrial permit.
4. Inform all new development they must conform with industry standards for SWPPPs and measures to comply with State and local requirements.	3	Currently in effect with SWPPP Industrial permit.

6.2.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by Airports Division to track expenditures for designing, developing, and implementing BMPs and educational activities. The Airports Division's annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

6.3 Buildings/Parking/Landscaping

6.3.1 Background

This section is primarily applicable to the General Services Department's Facilities Maintenance Division, Purchasing and Contracting Department, Library Department, Office of the City Treasurers, Homeless Services Division of the City Planning and Community Investment Department, and the Customer Services Department. This section is secondarily applicable to all City departments that operate and maintain City buildings, parking lots, and/or landscaping (except Park and Recreation Department which is addressed in Section 6.10, "Recreational Lands and Facilities"). The goal of this section is to reduce the impact of department or division operations and maintenance activities on storm water quality and provide guidance for the protection of water quality and receiving waters. This section contains storm water best management practices (BMPs) the departments or divisions will implement for operations and maintenance activities, in addition to inventory, inspection, pollutant discharge reporting, education and annual reporting requirements applicable to operations.

The City of San Diego currently owns over fourteen hundred buildings, parking lots, parking structures, and landscaped areas that are located in areas potentially exposed to storm water.

The City's programs must meet the requirements of the Municipal Storm Water Permit (Order No.R9-2007-0001 "Municipal Permit", see Appendix I), as described in Table 6.3-1.

Table 6.3-1. Permit requirements – Operations and Maintenance of Buildings, Parking Areas, and Landscaped Areas

URMP Section	Municipal Permit Section	Requirement (Summary)
6.3.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities and potential sources of pollutants.
6.3.3	(Pg. 32-34) D. 3. a. (2,3,4,5)	Implement and maintain BMPs.
6.3.4.1	(Pg. 35) D. 3. a. (7)	Inspect municipal areas, activities and implement any necessary follow up actions.
6.3.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.3.4.3	(Pg. 45) D. 5. (b, d);	Implement and designate an educational program for all City personnel and contractors.
6.3.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.3.2 Source Characterization

Each City department's facilities inventories are included in Appendix III, "Municipal Inventory." Department or division activities, their associated potential pollutants, and designated BMPs are listed in Table 6.3-2. The departments or divisions will update any changes to the inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.3.4.4, "Annual Report Forms."

6.3.3 Best Management Practice Requirements

6.3.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.3.3.1.1 to 6.3.3.1.2 below are the departments or divisions BMPs for operations and maintenance of buildings, parking areas, and landscaped areas.

If the department or division determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Stormwater Management and Discharge Control Ordinance (Stormwater Ordinance), the department or division will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, the departments or divisions will provide updates to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.3.4.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination."

6.3.3.1.1 Minimum BMPs

Departments or divisions will ensure that all City staff will implement the following minimum BMPs, as applicable.

1. Prior to starting activities, <u>locate storm drain system and prevent pollutants from entering.</u> Activity-specific BMPs are listed in Table 6.3-2.
2. <u>Only clean rainwater can be discharged to the storm drain system</u>. See Stormwater Ordinance Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.[1]
3. <u>Sweep up municipal areas after activities and/or spills</u>. Hosing down pollutants into the storm drain is prohibited by Stormwater Ordinance Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.

4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur after May 1 and before September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately the department or divisions' responsibility to prevent pollutant discharges to the storm drain system. Therefore, the departments or divisions will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

The departments or divisions will coordinate with the Purchasing and Contracting Department to ensure that as operations and maintenance contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

Purchasing and Contracting Department Responsibilities

The Purchasing and Contracting Department will ensure that as operations and maintenance contracts are initiated or renewed, the most current municipal minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

The Purchasing and Contracting Department will ensure that any updated minimum BMPs are sent to Storm Water Pollution Prevention Division before including these changes in the contracts and renewals.

6.3.3.1.2 Activity-Specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.3-2 will be implemented by departments or divisions that operate and maintain buildings, parking areas, and landscaped areas.

Table 6.3-2. BMPs Designated for Areas and Activities Associated with the Operation and Maintenance of Buildings, Parking, and Landscaped Areas.

Activity	Potential Pollutants	Best Management Practices
Boiler Maintenance	sediments, metals, organic compounds, trash and debris, oil and grease	• Discharge all treated boiler to the sanitary sewer with MWWD permission or recycled/reused in an approved closed loop system. • Dispose of discharges containing chemical additives properly, and never into the storm drain system.[4]
Concrete and Asphalt Work	sediments, organic compounds	• Schedule concrete removal activities for dry weather. • Take measures to protect any nearby storm drain system and adjacent watercourses prior to breaking up asphalt or concrete. • After breaking up old concrete, sweep up and dispose of materials. Recycle if feasible. • Do not allow any water to enter storm drain during saw-cutting and grinding operations. Use as little water as possible. Block or place berms to contain saw-cutting water, and wet- vac liquids or dry out work area and sweep. Or direct to landscape/dirt area to infiltrate. • If slurry enters storm drain system, remove material immediately, and dispose of properly.[2] • Remove saw-cut slurry as soon as possible (e.g., with a vacuum). • Avoid mixing excess amounts of fresh concrete or cement mortar onsite. • Store dry and wet materials under cover, protected from rain, wind, and runoff. • Designate concrete wash out areas for transit mixers and tools that will not discharge to the storm drain system or receiving waters. • Dispose of leftover material in the solid waste receptacle. Recycle if feasible.
Cooling Tower Maintenance	sediments, metals, organic compounds, trash and debris, oil and grease	• Direct to the sanitary sewer all cooling tower discharges.

Deleted: [6]

[2] Contact ESD-HMMP for disposal options.

Activity	Potential Pollutants	Best Management Practices
Dry Wall and Stucco Work	sediments, organic compounds	• Avoid mixing excess amounts of drywall mud or plaster. • Store dry and wet materials under cover, protected from rain, wind, and runoff. • Designate drywall or plaster wash out areas that will not discharge to the storm drain system. • Dispose of leftover material in a trash can or dumpster.
Exterior Building and Roof Cleaning	metals, sediments	• Do not allow any wash water to enter storm drain. Either: o Berm work area and wet-vac wash water or let work area dry and sweep up; or o Direct wash water to landscaping to infiltrate.
Fire Sprinkler Flushing	sediments, metals	• See Appendix IX, "Maintenance and Operations Contract Language."
HVAC, Chillers and Refrigerators Maintenance	sediments, metals, organic compounds, trash and debris, oil and grease	• Determine whether air conditioning units (generally found on roof) and chillers have a condensate line which is plumbed to a roof storm drain. o For existing buildings, non-contaminated discharge can go to the storm drain system. o For new development or building remodels, the discharge should go to the sanitary sewer. • Determine whether air conditioning and chiller units are treated with descaling or anti-algal agent. Properly dispose of all flushing agent residues and by-pass condensate line while flushing unit.[3] • When HVAC condenser tubes are flushed capture and dispose of properly. If chemicals are used contact ESD-HMMP for disposal options. • If defrost water or condensate is discharged, ensure defrost water does not come into contact with any pollutants.
Installation and Removal of Parking Meters	sediments, organic compounds	• Prior to starting activities, locate storm drain system and prevent pollutants from entering. • If parking meter is located over a storm drain, drill out four holes for changing the parking meter. Do not saw cut over the storm drain. • If parking meter is away from storm drain, use a jet hammer (no water will be used, dry method) to remove a square area around the meter pole. • Use a vacuum to remove debris (e.g., dust and particles). • Mix concrete in a tub, apply it to the square area, and allow it to dry. • Dry excess concrete in the tub and dispose of it to the landfill. • Vacuum area again to remove any remaining debris.

[3] Contact ESD-HMMP for disposal options.

Activity	Potential Pollutants	Best Management Practices
Irrigation Repair	pesticides, nutrients, sediments	• Inspect and repair irrigation systems regularly for broken water lines, sprinkler heads, and valves. • Reduce runoff by careful manual control of water volume and spray or adjusting automatic controls to minimize excess water runoff. • Prevent eroded soil resulting from a line break from entering the storm drain system. After digging out a line, return all soil to the hole and compact properly. Sweep area. • When bailing out muddy water, do not pour it into the storm drain system or curb. Pour it onto a landscaped area.

Landscaping	pesticides, nutrients, sediments	• Schedule chemical application at times when rain is not predicted and irrigation is not scheduled.
		• Apply and handle pesticides and keep detailed records in accordance with existing state regulations (California Title 3, Division 6, Pesticides and Pest Control Operations).
		• Collect and dispose of unused chemicals as a regulated waste.[4]
		• Use native plants when possible.
		• Keep removed vegetation, including clippings, chips, loose soils, and pruning debris away from the storm drain system and watercourses.
		• Consider applying compost instead of chemical fertilizers.
		• Rely on integrated pest management methods, including:
		  o No controls
		  o Physical/mechanical controls
		  o Environmental controls (mulching, pest-resistant vegetation, prescribed burns)
		  o Biological controls (predators, parasites, etc.)
		  o Less toxic chemical controls (e.g., soaps and oils) and/or hot water
		• If absolutely necessary, use the least toxic chemicals that will do the job (e.g., biodegradable products). Avoid use of copper-based pesticides.

Material Loading and Unloading	nutrients, trash, oil and grease, pesticides, oxygen demanding compounds, metals	• Prior to starting activities, locate storm drain system and prevent pollutants from entering (e.g., with silt fences, gravel bags, filter fabric, etc.). • Sweep up municipal areas after activities and/or spills. Hosing down pollutants to the storm drain is prohibited by Stormwater Ordinance Section 43.03. Use a broom or shovel or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law.[4] • Keep materials and waste piles covered and off the ground. Materials and waste stockpiles will be protected to prevent contact with rainfall and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.

[4] Contact ESD-HMMP for disposal options.

Activity	Potential Pollutants	Best Management Practices
Materials Handling, Storage, and Disposal	nutrients, trash, oil and grease, pesticides, oxygen demanding compounds, metals	• Sweep up municipal areas after activities and/or spills. Hosing down pollutants to the storm drain is prohibited by Stormwater Ordinance Section 43.03. Use a broom or shovel or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact Environmental Services, Hazardous Materials Management Program (HMMP) for assistance. • Keep materials and waste piles covered and off the ground. Materials and waste stockpiles will be protected to prevent contact with rainfall and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition. • Use secondary containment for hazardous materials. If rain water is captured in secondary containment and dispose of properly. • Never dispose of any materials down the storm drain system.
Painting (Oil or Water Based)	metals, organic compounds	• Store oil-base paint in a flammable storage cabinet. • Capture and properly dispose all oil-base paint. • Clean all oil-based brushes with paint thinner, and dispose properly into a hazardous waste 55-gallon drum. • Seal and properly place all latex paint into a closed confined space at the paint shop. • Wash and clean all latex water-based paint materials in a deep sink in the paint shop away from all storm water drains.
Parking Lot/Structure Maintenance	sediments, trash and debris, oil and grease, metals	• Sweep parking lot according to a schedule, which is determined by your department or division: o Lots generating high volumes of solid waste 2 x month o Lots generating medium volumes of solid waste 1 x month o Lots generating low volumes of solid waste 1 x year • Use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste.[4] • Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
Parking Structure Sump Pump Maintenance	sediments, organic compounds, oil and grease	• Remove any debris surrounding or inside the sump routinely. • Install a screen mesh or filter fabric on the sump grate to assist in protecting sumps from particulate debris and ensure it will not cause a flooding hazard.
Ponds and Fountains Maintenance	nutrients, metals, sediments, organic compounds	• Discharge to the sanitary sewer or to landscaping any overflow drainage from ponds and decorative fountains.[5] • Ensure pond or fountain filters are not back flushed into a street or storm drain system.

Deleted: [6]

[5] The facility should consult with MWWD if the ponds or fountains are treated with copper-based algaecides (shock), growth inhibitors or other agents.

<table>
<tr><th>Activity</th><th>Potential Pollutants</th><th>Best Management Practices</th></tr>
<tr><td>Refuse Dumpsters</td><td>sediments, metals, organic, compounds trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses</td><td>• Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
• Relocate dumpsters and bins away from storm drains systems.
• Discharge to the sanitary sewer (with MWWD permission) or infiltrate onto landscaping any contaminated rain water that has accumulated from an open container.
• Ensure dumpsters are not leaking. If so, repair, cover, and/or exchange dumpsters.</td></tr>
<tr><td>Roof Vents and Equipment Maintenance</td><td>oil and grease, sediments, metals, organic compounds, trash and debris</td><td>• Clean excessively greasy roof vents on a regular basis, especially during the wet season.
• Install catchment pans or trays at the base of the vents, if feasible.
• Properly seal and maintain duct work.
• Install protective devices around storm drain inlets, if feasible.
• Inspect roofs for residual machinery process residues (e.g, paper dust, saw dust, steam condensate, paint, etc.).</td></tr>
<tr><td>Storm Drain System Inspection and Cleaning</td><td>sediments, nutrients, trash and debris</td><td>• Annually inspect and clear all storm drain systems of debris or other foreign material. Storm drain system inspections and any necessary cleaning must occur between May 1 and September 30 each year.
• When practical, work is to be done when conditions are dry.

Storm Drain Inspection/Cleaning Schedule
<table>
<tr><th>Debris Volume
(Based on each storm drain facilities' debris volumes historically collected)</th><th>Frequency</th></tr>
<tr><td>1. High</td><td>Annually, between May 1 and September 30.*</td></tr>
<tr><td>2. Other (medium/low)</td><td>Annually at any time during the year.*</td></tr>
<tr><td colspan="2">* Following two years of inspections, any storm drain facility that does not contain debris may be inspected as needed, but not less than every other year.</td></tr>
</table></td></tr>
<tr><td>Vehicle and Equipment Washing</td><td></td><td>• See this activity's BMPs in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yards."</td></tr>
<tr><td>Vehicle and Equipment Maintenance</td><td></td><td>• See this activity's BMPs in Table 6.15-2 Section 6.15, "Vehicle Maintenance/Operations Yards."</td></tr>
</table>

Activity	Potential Pollutants	Best Management Practices
Vehicle and Equipment Fuel Dispensing Areas		• See this activity's BMPs in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yards."

6.3.3.2 Additional Controls for Municipal Areas and Activities

The Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303d listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in section 6.3.4.1 "Facilities Inspections and Improvements."

6.9.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.3.4.1 Facility Inspections and Improvements

This section applies to Facilities and Maintenance Division or other departments that maintain its own buildings and grounds. The Municipal Permit requires that the City inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges. Note: see Section 6.3.4.2, "Pollutant Discharge Notification" below for reporting requirements.

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303d listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.3-3, the first inspection will occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.3-3. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection the department or division determines that improvements to its BMPs are required, the department or division will perform the action (e.g., repair a structural BMP), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved (Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second bi-inspection). If the department or division determines that the modifications require additional time or funds to implement, the department or division will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Facility Inspection Forms are attached as Appendix XIV, "Inspection Forms" and are also located on the City's website.[6]

6.3.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by Departments and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Stormwater Ordinance Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

[6] http://www.sandiego.gov/thinkblue/resources/index.shtml

When Departments determines that a discharge poses a significant threat to water quality or human health, Departments must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the Departments to the Regional Board within five working days of the day the event was identified.

Departments will also notify other regulatory agencies as required on Form 304.

6.3.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, "Education."

6.3.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a "Storm Water and You" training module presented at the "New Employee Orientation" workshop. Staff that do not take the "New Employee Orientation"

workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive "refresher" training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via "e-tests" for randomly selected City employees with regular computer access will occur periodically between the mandated "refresher" courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.3.4.3.2 Activity-Specific Training

Municipal Departments

This section describes activity-specific trainings provided by the individual departments or divisions. The departments or divisions will create, execute, and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 6.2-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.3-4. Activity Specific BMP Training(s) Provided by the Departments/Divisions as Applicable.

Training Module/Item (as applicable)	Staff Level (i.e., Supervisor, Crew, etc.)	Available
Painting (Oil or Water Based)	Supervisor, Crew	ongoing
Dry Wall and Stucco Work	Supervisor, Crew	Summer 2009
Concrete and Asphalt Work	Supervisor, Crew	Summer 2009
Storm Drain System Inspection and Cleaning	Supervisor, Crew	ongoing
Refuse Dumpsters	Supervisor, Crew	Summer 2009
Material Loading and Unloading	Supervisor, Crew	Summer 2009
Materials Handling, Storage, and Disposal	Supervisor, Crew	Summer 2009
Ponds and Fountains Maintenance	Supervisor, Crew	Summer 2009
Roof Vents and Equipment Maintenance	Supervisor, Crew	Summer 2009
HVAC, Chillers and Refrigerators Maintenance	Supervisor, Crew	Summer 2009

Training Module/Item (as applicable)	Staff Level (i.e., Supervisor, Crew, etc.)	Available
Boiler Maintenance	Supervisor, Crew	Summer 2009
Cooling Tower Maintenance	Supervisor, Crew	Summer 2009
Fire Sprinkler Flushing	Engineer (Project Officer)	Summer 2009
Installation and Removal of Parking Meters	Supervisor, Crew	Ongoing

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.3.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Library Department, Office of the City Treasurer, and Customer Service Department's Community Service Centers in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.3-6 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.3-6. Library Department, Office of the City Treasurer, and Customer Service Department's Community Service Centers External Outreach Activities by Target Audience.

Dept/Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
Library Department/Office of City Treasurer/Customer Service Department		
Think Blue Brochure available in lobby information rack	1-5	Ongoing
Think Blue "3 C's" handout available in lobby information rack	1-5	Ongoing
Think Blue Flyer insert in Business Tax Renewal mailing	3	Ongoing

* Note the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.3.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by departments or divisions to track expenditures for designing, developing, and implementing BMPs and educational activities. The departments' or divisions' annual report information will be submitted to the Storm

Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, “Annual Report Form Questions” for department-specific reporting requirements.

6.4 *City-Owned Leased Properties*

6.4.1 Background

This section is applicable to the Real Estate Assets Department (READ), which is responsible for leasing and/or managing more than 550 City-owned properties. The goal of this component is to reduce pollutants in runoff from City-owned managed or leased properties and minimize the impact of tenant or lessee activities on storm water quality to the maximum extent practicable. This section contains storm water best management practices (BMPs) READ and its lessees will implement in addition to inventory, inspection, pollutant discharge reporting, education, and reporting requirements.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No.R9-2007-001 "Municipal Permit" see Appendix I), as described in Table 6.4-1.

Table 6.4-1. Municipal Permit Requirements – City-owned leased properties.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.4.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities and potential sources of pollutants.
6.4.3	(Pg. 32-34) D. 3. a. (2,3,4,5)	Implement and maintain BMPs.
6.4.4	(Pg. 45) D. 5. (b, d);	Implement and designate an educational program for all City personnel.
6.4.5 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.4.2 Source Characterization

READ manages an array of City-owned leased properties with commercial, industrial or residential uses operating on-site. Although READ manages these commercial, industrial and residential leases, these are classified as commercial/ industrial or residential land uses in the "Industrial/Commercial Inventory" (Appendix V) or "High Priority Residential Areas" (Appendix VII) inventory, and are treated as such by the City. Each year, READ will provide an updated list of these facilities to the Storm Water Pollution Prevention Division by July 15.

6.4.3 Best Management Practice Requirements

6.4.3.1 Updated BMP Requirements

As discussed in Section 6.4.2 above, READ's leased properties, including those leased to City Departments such as Homeless Services, are classified as Commercial/Industrial or Residential under the URMP because of the nature of their activities. These leased properties, therefore, are subject to the Commercial/Industrial or Residential BMP requirements identified in the "Commercial/Industrial" or "Residential" sections of this URMP (see Appendices V and VI).

It is ultimately the responsibility of READ staff to ensure the storm water requirements language is included in lease language as they are established or renewed, as identified in Sections 6.4.3.1.1 and 6.4.3.1.2, below. Collectively, these policies and procedures implemented during lease renewals represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any policies or procedures are eliminated or modified, the replacement set of policies or procedures must collectively provide equal or greater storm water quality protection. In addition, if it is determined that a READ policy or procedure does not sufficiently protect water quality, READ will modify its storm water policies, procedures and/or lease language, as necessary and provide the updated information to the Storm Water Pollution Prevention Division. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination." In addition to enforcement consequences, storm water violations may be considered a default on the lease by READ.

6.4.3.1.1 BMPs for Residential Leases

During residential lease establishment, renewal, or amendment, READ staff will ensure that the following storm water requirements are included in the lease contract or provided as an exhibit:

<u>"Water Quality – Best Management Practices</u>

The CITY and LESSEE are committed to the implementation of controls (best management practices, or BMPs) to manage activities on the premises in a manner which aids in the protection of the City of San Diego's precious water resources. It is the LESSEE's responsibility to identify and implement an effective combination of BMPs so as not to cause pollutant discharges to the storm drain system in violation of Section 43.03, San Diego Stormwater Management and Discharge Control Ordinance (Stormwater Ordinance).
.

Therefore, LESSEE shall, at a minimum, implement and comply with the following BMPs, as applicable:

(Pending: insert Appendix XII here)

It is ultimately the LESSEE's responsibility to prevent pollutant discharges to the storm drain system. Therefore, the LESSEE will identify and implement any additional BMPs that may be required to avoid the discharge of pollutants to the storm drain system."

6.4.3.1.2 BMPs for Industrial/Commercial Leases

During industrial or commercial lease establishment or renewal, READ staff will ensure that the following storm water requirements are included in the lease contract or provided as an exhibit:

"Water Quality – Best Management Practices

The CITY and LESSEE are committed to the implementation of controls (best management practices, or BMPs) to manage activities on the premises in a manner which aids in the protection of the City of San Diego's precious water resources. It is the LESSEE's responsibility to identify and implement an effective combination of BMPs so as not to cause pollutant discharges to the storm drain system in violation of Section 43.03, Stormwater Ordinance.

Therefore, LESSEE shall, at a minimum, implement and comply with the following BMPs, as applicable:

(Pending: insert Appendix X here)

It is ultimately the LESSEE's responsibility to prevent pollutant discharges to the storm drain system. Therefore, the LESSEE will identify and implement any additional BMPs that may be required to avoid the discharge of pollutants to the storm drain system."

6.4.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation education and training and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.4.4.1 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate.

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, "Education."

6.4.4.2 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a "Storm Water and You" training module presented at the "New Employee Orientation" workshop. Staff that do not take the "New Employee Orientation" workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive "refresher" training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via "e-tests" for randomly selected City employees with regular computer access will occur periodically between the mandated "refresher" courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.4.4.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by READ in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.4-2 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.4-2. Department External Outreach Activities by Target Audience.

Dept Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
1. Include Storm Water BMP language in all lease and permit agreements	1-4 depending on lessee/permittee and activity	ongoing
2. Provide access to the City's Storm Water Video	1-4	ongoing
3.Distribute Storm Water Pollution Prevention brochures to lessees, permittees, and any interested parties	1-4, depending on lessee/permittee and activity	ongoing

6.4.5 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by READ to track expenditures for designing, developing, and implementing BMPs and educational activities. READ will provide an updated list of all leaseholds each year to the Storm Water Pollution Prevention Division by July 15 each year. In addition, READ's annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

6.5 Household Hazardous Waste

6.5.1 Background

This section is applicable to the Environmental Services Department (ESD). ESD oversees and runs the Household Hazardous Waste (HHW) Program. The HHW Program description contains the measures taken to actively eliminate illicit discharges associated with the improper use and disposal of household hazardous materials. These include products used in the routine maintenance of a resident's home, yard, and/or vehicle. The HHW Program has been in operation since 1985 and has provided opportunities for the safe disposal of HHW through one-day collection events, a permanent facility, educational programs, and public/private partnership collection activities. The HHW Program serves to divert HHW from the City's municipal solid waste landfill, the sewer system, and the ground and storm drain system, since inappropriate disposal may adversely affect the quality of our receiving waters and ground water supplies. Thus, the program itself is a best management practice (BMP) and this environmental message is included in outreach materials when appropriate.

Beginning in fiscal year 2007, the fiscal responsibility for the diversion of HHW is equally shared by the Environmental Services Department (for diversion from the landfill), General Services Storm Water Pollution Prevention Division (for diversion from the ground and storm water), and Metropolitan Wastewater Department Environmental Monitoring and Technical Services (for diversion from the sewer system). A Service Level Agreement (SLA) was established, and it identified ESD as the service provider and defined the scope of work, responsibilities, and billing process.

Both the City and the private sector provide collection services for HHW. In 1999, a permanent household hazardous waste transfer facility (HHW transfer facility) was opened at the Miramar Landfill and now serves residents with weekly HHW disposal services. Additionally, to target "do-it-yourself mechanics", the City operates one-day collection events throughout the City that accept used motor oil, contaminated motor oil, oil filters, antifreeze, and vehicle batteries. These events are promoted as auto product recycling events. Also, the private sector voluntarily collects recyclable auto products from the public.

Recent legislation, SB20/SB50, established a payment system to support the collection and recycling of cathode ray tubes (CRTs) including computer monitors, television, and DVD players. Many private retailers provide collection of these items and other electronic devices. AB 2901, California's Cell Phone Recycling Act of 2004, AB 1125, the Rechargeable Battery Recycling Act, require retailers to offer no charge cell phone and rechargeable battery recycling options.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-001, "Municipal Permit," see Appendix I), as described in Table 6.5-1.

Table 6.5-1. Municipal Permit Requirements for Household Hazardous Waste.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.5.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities and potential sources of pollutants.
6.5.3	(Pg. 32-34) D. 3. a. (2,3,4,5); (Pg. 41) D.3.c.(2) (c)	Implement and maintain BMPs.
6.5.4	(Pg. 35) D. 3. a. (7)	Inspect municipal areas, activities and implement any necessary follow up actions.
6.5.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.5.4.3	(Pg. 45) D. 5.b.(1)(d)	Implement and designate an educational program for all City personnel, and public .
6.5.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.5.2 Source Characterization

The City of San Diego operates one HHW facility located at 5161 Convoy Street, San Diego. HHW activities, their associated potential pollutants, and designated BMPs are listed in Table 6.5-2. This facility is included in the Municipal Facilities inventory in Appendix III. ESD will update any changes to the inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.5.4.4, "Annual Report Forms."

6.5.3 Best Management Practice Requirements

6.5.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.5.3.1 to 6.5.3.2 below are the BMPs required for the HHW Transfer Facility and one-day collection events. The minimum and activity-specific BMPs identified in this section are documented and implemented by ESD policy or procedural manuals.

As the BMPs are improved or revised, ESD will provide updated documentation to the Storm Water Pollution Prevention Division with their annual report form. Updates will also be provided if it is determined that a municipal activity results in a discharge in violation of Section 43.03 of the Stormwater Management and Discharge Control Ordinance ("Stormwater Ordinance"). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated

or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination."

6.5.3.1.1 Minimum BMPs

ESD will ensure that all City staff implement the following minimum BMPs, as applicable.

1. Prior to starting activities, locate storm drain system and prevent pollutants from entering. Activity-specific BMPs are listed in Table 6.5-2.
2. Only clean rainwater can be discharged to the storm drain system. See Storm Water Ordinance Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.[1]
3. Sweep up municipal areas after activities and/or spills. Hosing down pollutants into the storm drain system is prohibited by Storm Water Ordinance Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.
4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur after May 1 and before September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.

10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately the ESD's responsibility to prevent pollutant discharges to the storm drain system. Therefore, ESD will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

ESD will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

6.5.3.1.2 Activity-Specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.5-2 shall be implemented at the HHW facility.

Table 6.5-2. BMPs Designated for Areas and Activities at Household Hazardous Waste Facilities.

Activity	Potential Pollutants	Best Management Practices
Refuse Dumpsters	Trash	• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Landscaping	Trash, Pesticides, organic compounds, organic waste	• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"

<table>
<tr><th>Activity</th><th>Potential Pollutants</th><th>Best Management Practices</th></tr>
<tr><td>Storm Drain System Inspection and Cleaning</td><td>sediment, metals, organic compounds, oil and grease, pesticides</td><td>• Close storm drain valve during hours of operations.
• Annually inspect and clear all storm drain systems and of debris or other foreign material. Storm drain system inspections and any necessary cleaning must occur between May 1 and September 30 each year.
• When practical, work is to be done when conditions are dry.

Storm Drain Inspection/Cleaning Schedule
<table>
<tr><th>Debris Volume
(Based on each storm drain facilities' debris volumes historically collected)</th><th>Frequency</th></tr>
<tr><td>1. High</td><td>Annually, between May 1 and September 30.*</td></tr>
<tr><td>2. Other (medium/low)</td><td>Annually at any time during the year.*</td></tr>
<tr><td colspan="2">* Following two years of inspections, any storm drain facility that does not contain debris when inspected may be inspected as needed, but not less than every other year.</td></tr>
</table></td></tr>
<tr><td>Unloading, Packaging and Sorting Areas</td><td>metals, organic compounds, oil and grease, pesticides</td><td>• Cover areas with a permanent canopy.</td></tr>
<tr><td>Hazardous Waste Unloading from Vehicle</td><td>metals, organic compounds, oil and grease, pesticides</td><td>• Place wastes on a cart and wheel to sorting area.
• Line sorting area with visqueen.
• Package wastes in sorting area.</td></tr>
<tr><td>Hazardous Waste Storage Area</td><td>metals, organic compounds, oil and grease, pesticides</td><td>• Store all wastes inside chemical storage lockers equipped with fire suppression systems and secondary containment.
• Store all wastes outside in secondary containment, on pallets and covered.</td></tr>
<tr><td>Hazardous Materials Storage Area</td><td>metals, organic compounds, oil and grease, pesticides</td><td>• Store materials in a Connex box or cover.</td></tr>
</table>

Activity	Potential Pollutants	Best Management Practices
One-day Collection Events	metals, organic compounds, oil and grease, pesticides	• Locate storm drains and cover with visqueen to prevent pollutants from entering. • Stage absorbent materials near storm drain if needed to address spills. • Cover packaging and sorting area with tent/canopy during inclement weather. • Line sorting area with visqueen. • Package wastes in sorting area. • Store hazardous waste in containers on a wood pallet until loaded on truck for shipment. • Inspect parking lot at end of event and remove visqueen from storm drains and pick-up any litter.

6.5.3.2 Additional Controls for Municipal Areas and Activates

The Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in Section 6.5.4.1 “Facilities Inspections and Improvements.”

6.5.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.5.4.1 Facility Inspections and Improvements

This section applies to ESD which maintains the household hazardous waste transfer facility. The Municipal Permit requires that the City inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges (Note: see Section 6.5.4.2, “Pollutant Discharge Notification” below for reporting requirements).

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.5-3, the first inspection will occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to April).

Table 6.5-3 Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January – April

If as a result of the inspection ESD determines that improvements to their BMPs are required, ESD will perform the action (e.g., repair a structural BMP), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second annual inspection. If ESD determines that the modifications require additional time or funds to implement, ESD will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Facility Inspection Forms are attached as Appendix XIV, "Inspection Forms" and are also located on the City's website.[2]

6.5.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by ESD and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Storm Water Ordinance Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm

[2] http://www.sandiego.gov/thinkblue/resources/index.shtml

water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When ESD determines that a discharge poses a significant threat to water quality or human health, ESD must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the ESD to the Regional Board within five working days of the day the event was identified.

ESD will also notify other regulatory agencies as required on Form 304.

6.5.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, "Education."

6.5.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.5.4.3.2 Activity-Specific Training

Municipal Departments

This section describes activity-specific trainings provided by ESD. ESD will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 6.5-3. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.5-3. Activity-specific BMP Training(s) Provided by HHW Program.

Training Module/Item	Staff Level (i.e., Supervisor, Crew, etc.)	Schedule
Proper BMPs for Collecting, Packaging, and Storing HHW	Contractor Staff City Field Crew Employees if applicable	Ongoing Tailgate safety briefing conducted before operations at HHW transfer facility and one-day events.

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.5.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by ESD in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.5-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.5-5. Department External Outreach Activities by Target Audience.

Dept Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
1. HHW Transfer Facility Brochure	4	Ongoing
2. Auto Product Recycling Event Flyer	4	Ongoing
3. Auto Product Recycling Event Water Bill Insert	4 - 5 - Other – City Water Bill Customer List	1 – 2 times annually
4. Auto Product Recycling Event *Pennysaver* Inserts	4 - 5 – Other – Selected zip codes all mailing addresses in zip code	Each Event (7-8 per year)
5. Auto Product Recycling Event San Diego *Union-Tribune* Inserts	4 - 5 – Other – Selected zip codes - all subscribers in zip code	Each Event (7-8 per year)
6. Auto Product Recycling Event Ads	4 – 5	1-5 ads per each event
7. Direct Mail of HHW transfer facility brochure and Auto Product Recycling Event schedule.	4 – ESD mailing list for selected City residential trash customers.	Based on funding and need.
8. Customer Service Hotline	1-4	Ongoing
9. Certified Oil Collection Center Inspections	3	Annually
10. ESD web page	1-4	Update as needed

6.5.4.4 Annual Report Forms

The Municipal Permit requires the City to report on their storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by Environmental Services Department to track expenditures for designing, developing, and implementing BMPs and educational activities. The Environmental Services Department annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, “Annual Report Form Questions” for department-specific reporting requirements.

6.6 Non-Emergency Fire-Rescue Activities

6.6.1 Background

This section is applicable to the Fire-Rescue Department's non-emergency fire-rescue activities. The goal of this Section is to reduce the impact of non-emergency activities on storm water quality. This section contains storm water best management practices (BMPs) the Fire-Rescue Department non-emergency fire-rescue activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

The Fire-Rescue Department's activities must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 6.6-1.

Table 6.6-1. Municipal Permit Requirements – Non-Emergency Fire-Rescue Activities.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.6.2	(Pg. 32) D. 3. a. (1);	Inventory municipal areas, activities and potential sources of pollutants.
6.6.3	(Pg. 32-34) D. 3. a. (2,3,4,5)	Implement and maintain BMPs.
6.6.4.1	(Pg. 35) D. 3. a. (7); (Pg. 13) B.3.	Inspect municipal areas, activities and implement any necessary follow up actions.
6.6.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.6.4.3	(Pg. 45) D. 5. b (1) (d)	Implement and designate an educational program for all City personnel and contractors.
6.6.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.6.2 Source Characterization

The Fire-Rescue Department's inventory includes the 46 fire stations, fire communications, fire training facility, fire logistics facility, air operations base, 10 permanent lifeguards stations and 47 seasonal lifeguard towers (see Appendix III. "Municipal Inventory"). Department activities, their associated potential pollutants, and designated BMPs are listed in Table 6.6-2. The Fire-Rescue Department will update any changes to the inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.6.4.4 "Annual Report Forms."

6.6.3 Best Management Practice Requirements

6.6.3.1 Updated BMP Requirement

The BMPs identified in Sections 6.6.3.1.1 to 6.6.3.1.2 below are the Fire-Rescue Department's BMPs for non-emergency fire-rescue activities.

If the Fire-Rescue Department determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Municipal Code, the Fire-Rescue Department will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, the Fire-Rescue Department will provide updates to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.6.4.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination."

6.6.3.1.1 Minimum BMPs

The Fire-Rescue Department will ensure that all City staff implement the following minimum BMPs, as applicable.

1. Prior to starting activities, locate storm drain system and prevent pollutants from entering. Activity-specific BMPs are listed in Table 6.6-2.
2. Only clean rainwater can be discharged to the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.[1]
3. Sweep up municipal areas after activities and/or spills. Hosing down pollutants into the storm drain is prohibited by Municipal Code Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.
4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur after May 1 and before September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately the Fire-Rescue Department's responsibility to prevent pollutant discharges to the storm drain system. Therefore, the Fire-Rescue Department and/or contractors will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

The Fire-Rescue Department will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

6.6.3.1.2 Activity-specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.6-2 will be implemented by Fire-Rescue Department's staff.

Table 6.6-2. BMPs Designated for Areas and Activities at with Non-fire Emergency Activities.

Activity	Potential Pollutants	Best Management Practices
Hazardous Materials Storage Area	oil and grease, pesticides, nutrients, metals, organic compounds oxygen-demanding substances	• Store materials in a Connex box, cover, or keep in secondary containment.
Hazardous Waste Storage Area	all	• Store all inside wastes in chemical storage and/or secondary containment. • Store all outside wastes in secondary containment and cover.

Activity	Potential Pollutants	Best Management Practices
Painting Activities	metals	• Do not perform paint preparation and equipment cleaning near storm drain system. • Monitor weather and wind direction to ensure that paint does not enter storm drain system or receiving waters. • Place canvas or plastic tarps under work to capture excess paint chips. • Dispose of paint leftovers according to the hazmat requirements.
Refuse Dumpsters	sediments, metals, organic, compounds trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses,	• Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas. • Relocate dumpsters and bins away from storm drains. • Discharge contaminated rain water that has accumulated from an open container to the sanitary sewer with MWWD permission or infiltrated onto landscaping. • Ensure dumpsters are not leaking. If so, repair, cover, and/or exchange dumpsters. • Place absorbent socks around bottom of scrap metal roll-off bins to capture runoff.
Training Activities		• Protect storm drains with filter fabric and gravel bags prior to the start of the activities. • Direct water flows to the landscaped areas, whenever possible. • When flows cannot be directed to a landscaped area, the officer in charge will ensure that debris is swept prior to starting the training activity and that the debris does not enter the storm drain system. • Pre-plan live fire training activities to allow the integration of storm drain system protection. • If an outside agency is using the facility, they will sign an agreement adhering to BMPs.

Activity	Potential Pollutants	Best Management Practices
		• Sweep up and dispose of properly any debris generated by a training activity.
Vehicle and Equipment Fuel Dispensing Areas	oil and grease	• Prior to starting activities, locate storm drain system and prevent pollutants from entering. • Use spill kits (dry clean up methods) for any spills.
Vehicle, Small Equipment, Lifeguard, ATV, Personal Water Craft, Vessel, and Trailer Maintenance	sediments, metals, organic, compounds trash and debris, oil and grease,	• Prior to starting activities, locate storm drain system and prevent pollutants from entering. • Use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste.[2] • If applicable, inspect outdoor drains and suspicious indoor drains in vehicle maintenance areas. • Ensure wash water for specialized equipment and bleed line releases from air compressor units are disposed of properly.[3] • Use spill kits (dry clean up methods) for any spills.
Vehicle Washing	sediments, metals, organic, compounds oil and grease	• Clean Fire-Rescue's light vehicles at Police Department substation automatic car washes or a commercial car wash. • If vehicles are unable to be cleaned at the above sites, prior to starting activities, locate storm drain system and prevent pollutants from entering. • Clean vehicles where runoff is directed to sanitary sewer system or to a drain with an oil/water separator. • If washing in an area where wash water cannot be directed to the sanitary sewer, wet/dry vacuum wash water or let it evaporate, then sweep up area when dry. Dispose of to sanitary sewer system. • Minimize use of detergents. • Dispose of solutions sanitary sewer system.

[2] Contact ESD-Hazardous Materials Management Program for assistance.
[3] See MWWD or ESD-HMMP for disposal options.

Activity	Potential Pollutants	Best Management Practices
		• Dispose of cleaning solutions used on response equipment in a utility sink.
Washing of Vessels	sediments, metals, organic, compounds oil and grease	• Keep all bilges clean of oil and other contaminants using spill containers, and vacuum containers. • When vessels are washed, use a minimum amount of biodegradable soap and discharge water into bay using bilge pumps. • Whenever feasible all captured waste water will be emptied into sewer system.
Refuse Dumpsters		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Vehicle and Equipment Fuel Dispensing Areas		• See this activity's BMP in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yard"
Material Handling/Storage and Disposal		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Loading/Unloading		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Storm Drain System Inspection and Cleaning		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Parking Lot/Structure Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Landscaping		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"

6.6.3.2 Additional Controls for Municipal Areas and Activities

The Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in Section 6.6.4.1 “Facilities Inspections and Improvements.”

6.6.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.6.4.1 Facility Inspections and Improvements

This section applies to the Fire-Rescue Department which maintains its own fire stations, training facility, air operations facility, life-guard stations, and repair facilities. The Municipal Permit requires that the Fire-rescue Department inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges. Note: see Section 6.6.4.2, “Pollutant Discharge Notification” below for reporting requirements.

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.6-3, the first inspection will occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.6-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection the Fire-Rescue Department determines that improvements to its BMPs are required, the Fire-Rescue Department will perform the action (e.g., repair a structural BMP), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection. If the Fire-Rescue Department determines that the modifications require additional time or funds to implement, the Fire-Rescue Department will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Facility Inspection Forms are attached as Appendix XIV, "Inspection Forms" and are also located on the City's website.[4]

6.4.3 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by the Fire-Rescue Department and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When the Fire-rescue Department determines that a discharge poses a significant threat to water quality or human health, the Fire-Rescue Department must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions

[4] http://www.sandiego.gov/thinkblue/resources/index.shtml

must be sent by the Fire-Rescue Department will to the Regional Board within five working days of the day the event was identified.

The Fire-Rescue Department will also notify other regulatory agencies as required on Form 304.

6.6.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, “Education.”

6.6.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide

training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.6.4.3.2 Activity-specific Training

Municipal Departments

This section describes activity-specific trainings provided by the Fire-Rescue Department. The Fire-Rescue Department will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 6.6-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.6-4. Activity-specific Training.

Training Module/Item	Staff Level (i.e., Supervisor, Crew, etc.)	Available
Vehicle washing	All	Spring 2009
Training Activities	All	Summer 2009
Hazardous Waste Storage Area	All	Summer 2009
Hazardous Materials Storage Area	All	Summer 2009
Storm Drain System Inspection and Cleaning	All	Summer 2009
Refuse Dumpsters	All	Summer 2009
Landscaping	All	Summer 2009
Parking Lot/Structure Maintenance	All	Summer 2009

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.6.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Airports Division in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.2-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.6-6. Department External Outreach Activities by Target Audience.

Dept Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Available
Lifeguards		
1. Boaters- Sewage/Bilge BMPs	4	July 2007
2. Recreation Vehicle- Sewage BMPs	4	July 2007
3. Beach Day Users- BMPs	4	August 2007
4. Mission Bay Boater's Guide/Map	4	Existing

6.6.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by the Fire-Rescue Department to track expenditures for designing, developing, and implementing BMPs and educational activities. The department's annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirement.

6.7 Non-Emergency Police Activities

6.7.1 Background

This program section is applicable to the Police Department's non-emergency activities. The goal of this section is to reduce the impact of non-emergency police activities on storm water quality. This section contains storm water best management practices (BMPs) the Police Department will implement non-emergency activities in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

The Police Department's activities must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-001, "Municipal Permit," see Appendix I), as described in Table 6.7-1.

Table 6.7-1. Municipal Permit requirements – Non-Emergency Police Activities.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.7.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities and potential sources of pollutants.
6.7.3	(Pg. 32-34) D. 3. a. (2,3,4,5)	Implement and maintain BMPs.
6.7.4.1	(Pg. 35) D. 3. a. (7)	Inspect municipal areas, activities and implement any necessary follow up actions.
6.7.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.7.4.3	(Pg. 45) D. 5. (b, d);	Implement and designate an educational program for all City personnel.
6.7.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.7.2 Source Characterization

The Police Department's facilities inventory includes nine area command stations, headquarters, and the traffic division, air patrol, canine patrol, and mounted patrol facilities (see Appendix III, "Municipal Inventory"). Department activities, their associated potential pollutants, and designated BMPs are listed in Table 6.7-2. The Police Department will update any changes to the inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.7.4.4, "Annual Report Forms."

6.7.3 Best Management Practice Requirements

6.7.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.7.3.1.1 to 6.7.3.1.2 below are the Police Department's BMPs for non-emergency activities.

If the Police Department determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Municipal Code, the Police Department will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, the Police Department will provide updates to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.7.4.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination."

6.7.3.1.1 Minimum BMPs

The Police Department will ensure that all City staff implement the following minimum BMPs, as applicable.

1. Prior to starting activities, locate storm drain system and prevent pollutants from entering. Activity-specific BMPs are listed in Table 6.7-2.
2. Only clean rainwater can be discharged to the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.[1]
3. Sweep up municipal areas after activities and/or spills. Hosing down pollutants into the storm drain is prohibited by Municipal Code Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.
4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur after May 1 and before September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately the Police Department's responsibility to prevent pollutant discharges to the storm drain system. Therefore, the Police Department will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

The Police Department will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

X.X.3.2 Activity Specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.7-2 will be implemented by Police Department's staff.

Table 6.7-2. BMPs Designated for Areas and Activities Associated with Non-emergency Police Activities.

Activity	Potential Pollutants	Best Management Practices
Vehicle Washing	sediments, metals, organic compounds, trash and debris, oil and grease	• Wash all police vehicles inside the automatic car wash. • Wash Meter-Reader Vehicles inside of the automatic carwash with a hose.
Canine Unit	bacteria	• Officers pick up dog waste daily with bags and dispose of in trash cans.
Pistol Range	sediments, metals	• Drains divert rain water from contacting the soils around the backdrop.

Activity	Potential Pollutants	Best Management Practices
Mounted Unit	nutrients, sediments, organic compounds, trash and debris	• Wash horse trailers and rinse at Central Operations Yard in the wash rack. • If horse manure is deposited while on patrol, the officer will phone the stables for another officer to come in a vehicle and pick up the manure. If no one is available, the officer will return in a vehicle after patrol and clean up the manure. The manure is placed in a garbage bag and disposed of in the trash. • Collect horse manure in the turnouts and stalls daily and disposed of in a covered dumpster. • Protect storm drains in the turnout area with sandbags to prevent sediment from entering. • Conduct horse washing in the designated horse washing area that drains to the sanitary sewer.
Helicopter maintenance	sediments, metals, organic compounds, trash and debris, oil and grease	• Perform all repairs in the hangar.
Vehicle and Equipment Fuel Dispensing Areas	sediments, metals, organic compounds, trash and debris, oil and grease	• Prior to starting activities, locate storm drain system and prevent pollutants from entering. • Use spill kits (dry clean up methods) for any spills.
Hazardous Waste Storage Area	nutrients, trash, oil and grease, pesticides, oxygen demanding compounds, metals	• Store all inside wastes are stored in chemical storage lockers and/or secondary containment. • Store all outside wastes in secondary containment and cover.
Storm Drain System Inspection and Cleaning		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Refuse Dumpsters		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Landscaping		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Parking Lot/Structure Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Loading/Unloading		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Handling/Storage and Disposal		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Ponds and Fountain Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Roof Vents and Equipment Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"

Activity	Potential Pollutants	Best Management Practices
HVAC, Chillers and Refrigerators Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Cooling Tower Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Parking Structure Sump Pump Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"

6.7.3.2 Additional Controls for Municipal Areas and Activities

The Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, the Police Department will conduct a second facility inspection as described in detail in Section 6.2.4.1 "Facilities Inspections and Improvements."

6.7.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.7.4.1 Facility Inspections and Improvements

This section applies to the Police Department's facilities (see Appendix III, "Municipal Inventory"). The Municipal Permit requires that the City inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges (Note: see Section 6.7.4.2, "Pollutant Discharge Notification" below for reporting requirements).

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.7-3, the first inspection will

occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.7-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection the Police Department determines that improvements to their BMPs are required, the Police Department will perform the action (e.g., repair a structural BMP), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved (Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection). If the Police Department determines that the modifications require additional time or funds to implement, the Police Department will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Facility Inspection Forms are attached as Appendix XIV, “Inspection Forms” and are also located on the City’s website.[2]

6.7.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by The Police Department and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Municipal Code Section 43.0305 “Exemptions from Discharge Prohibition” to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a

[2] http://www.sandiego.gov/thinkblue/resources/index.shtml

fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When The Police Department determines that a discharge poses a significant threat to water quality or human health, The Police Department must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the Police Department to the Regional Board within five working days of the day the event was identified.

The Police Department will also notify other regulatory agencies as required on Form 304.

6.7.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, "Education."

6.7.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.7.4.3.2 Activity-specific Training

Municipal Departments

This section describes activity-specific trainings provided by the Police Department. The Police Department will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 6.7-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.7-4. Activity Specific BMP Training(s) Provided by the Police Department.

Training Module/Item	Staff Level (i.e., Supervisor, Crew, etc.)	Schedule
Storm Water BMPs for Air Support	Supervisor, Crew	Ongoing
Storm Water BMPS for Canine Patrol Units	Supervisor, Crew	Ongoing
Storm Water BMPs for Mounted Police	Supervisor, Crew	Ongoing
Parking Structure Sump Pump Maintenance	Supervisor, Crew	Ongoing

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.7.4.4 Annual Report Forms

The Municipal Permit requires the City to report on their storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by the Police Department to track expenditures for designing, developing, and implementing BMPs and educational activities. The Police

Department's annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

6.8 Metropolitan Wastewater Collection

6.8.1 Background

The Metropolitan Wastewater Department (MWWD) Collection Division operates the facilities covered under this section. Among other tasks, the Collection Division provides ongoing preventive cleaning, maintenance, and repair of the Municipal Sewage Collection System, including emergency removal of sewer line stoppages, equipment overhaul and repair, on-site facility inspections, and maintenance of the structural integrity of sewer mains and manholes in the collection system. Although sewage systems themselves are not a regular source of storm water pollution, raw sewage contains pollutants that can pose a serious threat to both human health and the quality of receiving waters if they enter the storm drain system through incidents such as spills, leaks, or overflows. The goal of this program is to reduce the impact of wastewater collection activities on storm water quality in the San Diego region. This section contains storm water best management practices (BMPs) that MMWD will implement for wastewater collection activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 6.8-1.

Table 6.8-1. Municipal Permit requirements – Metropolitan Wastewater Collection

URMP Section	Municipal Permit Section	Requirement (Summary)
6.8.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities, and potential sources of pollutants.
6.8.3	(Pg. 32-34) D. 3. a. (2,3,4,5,6)	Implement and maintain BMPs.
6.8.4.1	(Pg. 35) D. 3. a. (7); (Pg. 43) D.4.g	Inspect municipal areas, activities and implement any necessary follow up actions. Implement sanitary sewer and storm drain system surveys and preventive maintenance. Prevent, respond to, contain and clean up sewage spills.
6.8.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.8.4.3	(Pg. 45) D. 5. b. (1) (d)	Implement and designate an educational program for all City personnel and contractors.
6.8.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.8.2 Source Characterization

MWWD Facilities that are covered under this program component include office buildings, sanitary sewer pipes, and approximately 90 small pump stations. The complete inventory of MWWD assets are included in Appendix III, ”Municipal Inventory.” MWWD’s activities, their associated potential pollutants, and designated BMPs are listed in Table 6.8-2. MWWD will update any changes to the inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.8.4.4, “Annual Report Forms.”

6.8.3 Best Management Practice Requirements

6.8.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.8.3.1.1 to 6.8.3.1.2 below are the BMPs required of MMWD. The minimum and activity-specific BMPs identified in this section are documented and implemented via the City’s, Sewer Overflow Response and Tracking Plan (SORTP).

If MWWD determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Municipal Code, MWWD will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, MWWD will provide an updated SORTP or other internal Division policy or procedural manuals to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.8.4.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in “Illicit Discharge Detection and Elimination.”

6.8.3.1.1 Minimum BMPs

MWWD will ensure that all City staff implement the following minimum BMPs, as applicable.

1. Prior to starting activities, <u>locate storm drain system and prevent pollutants from entering.</u> Activity-specific BMPs are listed in Table 6.8-2.
2. <u>Only clean rainwater can be discharged to the storm drain system</u>. See Municipal Code Section 43.0305 “Exemptions from Discharge Prohibition” for allowable discharges.[1]
3. <u>Sweep up municipal areas after activities and/or spills</u>. Hosing down pollutants into the storm drain is prohibited by Municipal Code Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.

4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur after May 1 and before September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately MWWD's responsibility to prevent pollutant discharges to the storm drain system. Therefore, MWWD will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

MWWD will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

6.8.3.1.2 Activity-Specific BMPs

In addition to the minimum BMPs listed above, the following activity-specific BMPs listed in Table 6.8-2 will be implemented by MMWD.

Table 6.8-2. BMPs Designated for Areas and Activities at MWWD Collection Facilities.

Activity	Potential Pollutants	Best Management Practices
Clean Up and Mitigation Activities after a Sewer Spill (public)	nutrients, metals, oxygen-demanding substances, bacteria and viruses	• Operate a public sewer spill reporting hotline. • When potential sewer spills are identified through the public hotline, visual observations or other means, MWWD will investigate each case and where spills are identified, implement measures to abate the spill and prevent future discharges. In addition, for public spills, remove sewage from the storm drain system (Storm Water Pollution Prevention Division will ensure that the storm drain system is cleaned after private spills). (see Appendix XVII, SORTP, Section 7.0, "Overflow Response, Containment, Correction and Clean-Up").
Erosion Control at Work Sites	sediments, trash and debris, nutrients	• Disturb as little vegetation on site as possible. • Minimize soil exposure time. • Stabilize exposed soils. • Clean up with a minimum amount of water keeping debris from entering the storm drain system.
Structural Controls Maintenance	organic compounds, trash and debris, bacteria and viruses	• Inspect and remove the wastes that may have accumulated, and properly dispose of all wastes. • Eliminate and/or clean up discharges to the storm drain system during maintenance and cleaning operations.
Prevent Sewage Spills	nutrients, metals, oxygen-demanding substances, bacteria and viruses	• Implement a system wide cleaning plan where every pipe is cleaned on at least a 5 year frequency. If a problem is noted, adjust the cleaning frequency and repair or replace the pipe.
Prevent Infiltration from Sanitary Sewer to Storm Drain System	nutrients, metals, oxygen-demanding substances, bacteria and viruses	• During routine maintenance and inspection, note the condition of sanitary sewer structures and identify areas that are in need of repair or maintenance to prevent seepage from the sewer system to the storm drain system. • Educate field staff to recognize suspected seepage from the municipal sewer to the storm drain system. • Televise sewer mains to determine the structural integrity and condition of pipes. • Comply with the County Health Department's minimum requirement for the acceptable separation between the newly installed sewer pipelines and the storm drain system. • Eliminate any known illicit connection between the sewer system and the storm drain system as described above.
Stock Piles Associated with Emergency Repairs	sediments, nutrients	• Identify inlet catch basins and protect with sand bags. • Surround spoil piles left on street and surround with sand bags. • Sweep up and bag debris. Don't sweep it into the trench. • Capture wash water and dispose of properly. • Dispose of sewage contaminated soils at the sanitary landfill immediately and placed on the streets.
Elimination of Illicit Discharges	nutrients, metals, oxygen-demanding	• See Appendix XVII, SORTP, Section 7.0 Overflow Response, Containment, Correction and Clean-Up)

Activity	Potential Pollutants	Best Management Practices
and Connections	substances, bacteria and viruses	
Concrete and Asphalt Work	oil and grease, sediments, nutrients	• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Materials Handling, Storage, and Disposal	nutrients, trash, oil and grease, pesticides, oxygen demanding compounds, metals	• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Loading and Unloading	nutrients, trash, oil and grease, pesticides, oxygen demanding compounds, metals	• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Parking Lot/Structure Maintenance	sediments, trash and debris, oil and grease, metals	• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Landscaping	sediments, nutrients, pesticides	• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Storm Drain System Inspection and Cleaning	sediments, nutrients, bacteria and viruses, pesticides, metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease	• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Vehicle and Equipment Washing	sediments, metals, organic, compounds, trash and debris, oil and grease	• See this activity's BMP in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yards"
Vehicle Equipment Maintenance	sediments, metals, organic, compounds trash and debris, oil and grease	• See this activity's BMP in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yards"
Vehicle and	sediments,	• See this activity's BMP in Table 6.15-2, Section 6.15, "Vehicle

Activity	Potential Pollutants	Best Management Practices
Equipment Fuel Dispensing Areas	metals, organic, compounds trash and debris, oil and grease	Maintenance/Operations Yards”

6.8.3.2 Additional Controls for Municipal Areas and Activities

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in Section 6.8.4.1 “Facilities Inspections and Improvements.”

6.8.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.8.4.1 Facility Inspections and Improvements

The Municipal Permit requires that MWWD inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges Note: see Section 6.8.4.2, “Pollutant Discharge Notification” below for reporting requirements.

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.8-3, the first inspection will occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.8-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection MWWD determines that improvements to its BMPs are required, MWWD will perform the action (e.g., repair a structural BMP), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection. If the Division determines that the modifications require additional time or funds to implement, the Division will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Facility Inspection Forms are attached as Appendix XIV, "Inspection Forms" and are also located on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml.

6.8.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by Airports Division and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When Airports Division determines that a discharge poses a significant threat to water quality or human health, Airports Division must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by MWWD to the Regional Board within five working days of the day the event was identified. MWWD will also notify other regulatory agencies as required on Form 304.

6.8.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate.

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, "Education."

6.8.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a "Storm Water and You" training module presented at the "New Employee Orientation" workshop. Staff that do not take the "New Employee Orientation" workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive "refresher" training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via "e-tests" for randomly selected City employees with regular computer access will occur periodically between the mandated "refresher" courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.8.4.3.2 Activity-specific Training

Municipal Departments

This section describes activity-specific trainings provided by MWWD. MWWD will create, execute, and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 6.8-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.8-4. Activity-Specific BMP Training(s) provided by MMWD.

Training Module/Item [	Staff Level (i.e., Supervisor, Crew, etc.)	Schedule
Hazardous Waste Operations & Emergency Response	Supervisor, Crew	Ongoing
International Organization for Standardization (ISO) Awareness Training 07	Supervisor, Crew	Ongoing
ISO 14001 Safety Tailgate	Supervisor, Crew	Ongoing
ISO 14001 (Awareness)	Supervisor, Crew	Ongoing
ISO 14001 (BMP Training/Collection Division	Supervisor, Crew	Ongoing
ISO 14001 (Environmental Coordinator)	Supervisor, Crew	Ongoing
ISO 14001 (Internal Auditor)	Supervisor, Crew	Ongoing
ISO 14001 (Intro Overview)	Supervisor, Crew	Ongoing
Storm Water - BMPS - WWCD	Supervisor, Crew	Ongoing
Storm Water Pollution Prevention – General	Supervisor, Crew	Ongoing
Tailgate (Hazardous Material Control Program)	Supervisor, Crew	Ongoing
Tailgate (Hazardous Plants)	Supervisor, Crew	Ongoing
Tailgate (Hazardous Waste – Antifreeze Coolant)	Supervisor, Crew	Ongoing
Tailgate (Hazardous Waste Handling and Storage)	Supervisor, Crew	Ongoing
Tailgate (Hazardous Waste Minimization)	Supervisor. Crew	Ongoing
Tailgate (IOS 14001 – Objective/Targets 2005)	Supervisor. Crew	Ongoing
Tailgate (ISO 14001 - Recycling)	Supervisor, Crew	Ongoing
Tailgate (ISO 14001 Safety)	Supervisor, Crew	Ongoing
Tailgate (ISO 14401 - Audit)	Supervisor, Crew	Ongoing
Tailgate (Storm Water and You)	Supervisor, Crew	Ongoing
Tailgate (Storm Water Pollution Prev. Program)	Supervisor, Crew	Ongoing
Hazardous Waste Operations and Emergency Response	Supervisor, Crew	Ongoing

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.8.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by MWWD in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.8-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.8-5. Department External Outreach Activities by Target Audience.

Department Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
Metropolitan Waste Water Collection Division:		
Canyon Watch Program	3,4	Ongoing
Food Establishment Wastewater Discharge Program (FEWD)	3	
Sewer Spill Hotline	1,2,3,4,5	Ongoing
The FOG Program (Fats, Oils and Grease) Brochures, magnets, grease scrapers, pencils, etc.)	3,4,5	Ongoing
Treatment and Disposal Division		
School Education Tours of Treatment Plants	4	Ongoing
Pt. Loma Wastewater Treatment Plant Brochure	2,3,4	Ongoing
South Bay Water Reclamation Plant Brochure	2,3,4	Ongoing
North City Water Reclamation Plant Brochure	2,3,4	Ongoing
Metro Biosolids Center Brochure	1,2,3,4,5	Ongoing
North City Water Reclamation Plant Brochure	1,2,3,4,5	Ongoing
Environmental Monitoring and Technical Services Division		
Industrial Wastewater Control Program (IWCP) Brochure	1,2,3,4,5	Ongoing
Ocean Monitoring Brochure	4,5	Ongoing
Department-Wide		
MWWD website	1,2,3,4,5	Ongoing
Informational Videos on MWWD website (17)	1,2,3,4,5	Ongoing
Water/Sewer bill inserts	2,3,4,5	
Metropolitan Wastewater Department Brochure	2,3,4,5	Ongoing
MWWD Energy Fact Sheet	2,3,4,5	Ongoing
MWWD Information Line	1,2,3,4,5	Ongoing
City Hall elevator posters	,3,4	Ongoing

6.8.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by MMWD to track expenditures for designing, developing, and implementing BMPs and educational activities. The Division's annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

6.9 Metropolitan Wastewater Treatment and Maintenance

6.9.1 Background

The Metropolitan Wastewater Department (MWWD) is responsible for the conveyance, treatment and disposal of wastewater and its by-products. This section is relevant to Treatment and Disposal, Environmental Monitoring Technical Services, and Engineering and Program Management Divisions, and also to Central Support staff who oversee department-wide facilities maintenance. In addition to operating plants and pump stations, MWWD is responsible for regulatory compliance, design, construction, and upgrades to facilities, among other tasks.

Although sewage systems themselves should not be a regular source of storm water pollution, raw sewage contains pollutants that can pose a serious threat to both human health and the quality of receiving waters if it enters the storm drain system through incidents such as spills, leaks, or overflows. The goal of this program is to reduce the impact of City-owned wastewater facilities, support facilities, and associated construction activities on storm water quality in the San Diego region. This section contains storm water best management practices (BMPs) that MWWD staff and its contractors will implement for treatment and maintenance activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 6.9-1.

Table 6.9-1. Municipal Permit Requirements – Metropolitan Wastewater Treatment and Maintenance.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.9.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities, and potential sources of pollutants.
6.9.3	(Pg. 32-34) D. 3. a. (2,3,4,5,6)	Implement and maintain BMPs.
6.9.4.1	(Pg. 35) D. 3. a. (7); (Pg. 43) D.4.g	Inspect municipal areas, activities and implement any necessary follow up actions.
6.9.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.9.4.3	(Pg. 45) D. 5. b. (1) (d)	Implement and designate an educational program for all MWWD personnel and contractors.
6.9.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.9.2 Source Characterization

MWWD's Treatment and Disposal facilities can be divided into two categories. The first category, hereafter referred to as "plants", includes the Point Loma Wastewater Treatment Plant, the North City Water Reclamation Plant, the South Bay Water Reclamation Plant, and the Metropolitan Biosolids Center. The second category, hereafter referred to as "pump stations" includes Pump Station #1, Pump Station #2, Pump Station #64, Pump Station #65, Peñasquitos Pump Station, Grove Avenue Pump Station, Otay River Pump Station, and East Mission Gorge Pump Station. The twelve facilities listed above are subject to the California General Industrial Activities Storm Water National Pollutant Discharge Elimination System (NPDES) Permit. As such, these facilities have Storm Water Pollution Prevention Plans (SWPPPs) in place.
In addition to the plants and pump stations, MWWD staff oversees the facility management of the Metropolitan Operations Complex (MOC) and the Environmental Monitoring and Technical Services Laboratory. The complete inventory of MWWD's facilities is included in Appendix III, "Municipal Inventory." MWWD activities, their associated potential pollutants, and designated BMPs are listed in Table 6.9-2. MWWD will update any changes to the inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.9.4.4, "Annual Report Forms."

6.9.3 Best Management Practice Requirements

6.9.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.9.3.1 to 6.9.3.2 are the BMPs required for MWWD treatment and maintenance activities.

If MWWD determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Municipal Code, MWWD will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, MWWD will provide updates to SWPPPs in addition to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.9.4.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination."

6.9.3.1.1 Minimum BMPs

MWWD will ensure that all City staff implements the following minimum BMPs, as applicable.

1. Prior to starting activities, locate storm drain system and prevent pollutants from entering. Activity-specific BMPs are listed in Table 6.9-2.
2. Only clean rainwater can be discharged to the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.[1]
3. Sweep up municipal areas after activities and/or spills. Hosing down pollutants into the storm drain is prohibited by Municipal Code Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.
4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur after May 1 and before September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance..
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately MWWD's responsibility to prevent pollutant discharges to the storm drain system. Therefore, MWWD will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

MWWD will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations & Maintenance Contract Language" for current language as of January 25, 2008).

6.9.3.1.2 Activity-Specific BMPs

In addition to the minimum BMPs listed above, the following activity-specific BMPs listed in Table 6.9-2 will be implemented by MWWD.

Table 6.9-2. BMPs Designated for Areas and Activities Relating to MWWD Treatment and Maintenance.

Activity	Potential Pollutants	Best Management Practices
Clean Up and Mitigation Activities after a Chemical or Sewer Spill	nutrients, metals, oxygen-demanding substances, bacteria and viruses	• When potential sewer spills are identified at or near MWWD facilities, MWWD will investigate each case and where spills are identified, implement measures to abate the spill and prevent and/or remove sewage from the storm drain system.
Erosion Control in Work Sites	sediments, trash and debris, nutrients	• Leave as much vegetation on site as possible, minimize soil exposure time, stabilize exposed soils • Clean up with a minimum amount of water keeping debris from entering the storm drain system.
Spill/Leak/Overflow Response and Containment at Pump Stations	nutrients, metals, oxygen-demanding substances, bacteria and viruses	• Perform scheduled maintenance to maximize the reliability and life expectancy of all equipment. • Prioritize repairs based on the nature and severity of the problem. • Administer a corrective work order system to address problems with equipment identified by operations and maintenance staff. • Maintain a spare parts inventory to reduce equipment repair time • Track and schedule routine maintenance using the Computerized Preventative Maintenance Program.
Resse or Disposal of Sewage Sludge	nutrients, metals, oxygen-demanding substances, bacteria and viruses	• Sludge is pumped to the MWWD Biosolids Center, dewatered, and trucked for off site disposal.
Reverse Osmosis and Deionization Units Maintenance	oxygen-demanding substances, organic compounds	• Ensure reject water from reverse osmosis (R.O.) units, in no way impacts the storm drain system. Divert reject water from R.O. units to the sanitary sewer. • Discharge back flush water from deionization units into the sanitary sewer.
Boat maintenance	sediments, metals, organic,	• Prior to starting activities, locate storm drain system and prevent pollutants from entering. • Use drip pans for all vehicle leaks and/or clean up with dry

Activity	Potential Pollutants	Best Management Practices
	compounds trash & debris, oil & grease	methods and dispose of as a regulated waste. Repair vehicle as soon as possible. Contact ESD-HMMP for assistance. • Use spill kits (dry clean up methods) for any spills.
Concrete and Asphalt Work		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping
Materials Handling, Storage, and Disposal		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Loading and Unloading		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Parking Lot/Structure Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Landscaping		• See this activity's BMPs in Table 6.3-2, Section 6.3, "Buildings/Parking Facilities/Landscaping"
Storm Drain System Inspection and Cleaning		• See this activity's BMPs in table 6.3-2, Section 6.3, "Buildings/Parking Facilities/Landscaping"
Refuse Dumpsters		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
HVAC, Chillers and Refrigerators Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Boiler Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Painting (Oil or Water Based)		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Dry Wall and Stucco Work		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Roof Vents and Equipment Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Cooling Tower Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Vehicle and Equipment Washing		• See this activity's BMPs in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yards"
Vehicle Equipment Maintenance		• See this activity's BMPs in Table 6.15-2 Section 6.15, "Vehicle Maintenance/Operations Yards"
Vehicle and Equipment Fuel Dispensing Areas		• See this activity's BMPs in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yards"
Wastewater Facilities Design Upgrades		• See this activity's BMPs in Table 4-2, Section 4.0, "Development Planning"
Wastewater Facilities Construction		• See this activity's BMPs in Table 5-2, Section 5.0, "Construction"

6.9.3.2 Additional Controls for Municipal Areas and Activities

The Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in section 6.9.4.1 “Facilities Inspections and Improvements.”

6.9.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.9.4.1 Facility Inspections and Improvements

The Municipal Permit requires that the City inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges (Note: see Section 6.9.4.2, “Pollutant Discharge Notification” below for reporting requirements).

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.9-3, the first inspection will occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.9-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection MWWD determines that improvements to its BMPs are required, MWWD will perform the action (e.g., repair a structural BMP and/or update the

SWPPPs), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved (Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection). If MWWD determines that the modifications require additional time or funds to implement, MWWD will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Facility Inspection Forms are attached as Appendix XIV, "Inspection Forms" and are also located on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml.

6.9.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by MWWD and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When MWWD determines that a discharge poses a significant threat to water quality or human health, MWWD must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the MWWD to the Regional Board within five working days of the day the event was identified.

MWWD will also notify other regulatory agencies as required on Form 304.

6.9.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, “Education.”

6.9.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-

based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.9.4.3.2 Activity-Specific Training

Municipal Departments

This section describes activity-specific trainings provided by the MWWD. The MWWD will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs inTable 6.9-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.9-4. Activity-specific BMP Training(s) Provided by MWWD.

Training Module/Item	Staff Level (i.e., Supervisor, Crew, etc.)	Schedule
Hazardous Waste Operations and Emergency Response	Supervisor, Crew	Ongoing
International Organization for Standardization (ISO) Awareness Training 07	Supervisor, Crew	Ongoing
ISO 14001 Safety Tailgate	Supervisor, Crew	Ongoing
ISO 14001 (Awareness)	Supervisor, Crew	Ongoing
ISO 14001 (BMP Training/Collection Division	Supervisor, Crew	Ongoing
ISO 14001 (Environmental Coordinator)	Supervisor, Crew	Ongoing
ISO 14001 (Internal Auditor)	Supervisor, Crew	Ongoing
ISO 14001 (Intro Overview)	Supervisor, Crew	Ongoing
Storm Water - BMPS - WWCD	Supervisor, Crew	Ongoing
Storm Water Pollution Prevention – General	Supervisor, Crew	Ongoing
Tailgate (Hazardous Material Control Program)	Supervisor, Crew	Ongoing
Tailgate (Hazardous Plants)	Supervisor, Crew	Ongoing
Tailgate (Hazardous Waste - Antifreeze Coolant)	Supervisor, Crew	Ongoing
Tailgate (Hazardous Waste Handling and Storage)	Supervisor, Crew	Ongoing
Tailgate (Hazardous Waste Minimization)	Supervisor. Crew	Ongoing
Tailgate (IOS 14001 - Objective/Targets 2005)	Supervisor. Crew	Ongoing
Tailgate (ISO 14001 - Recycling)	Supervisor, Crew	Ongoing
Tailgate (ISO 14001 Safety)	Supervisor, Crew	Ongoing
Tailgate (ISO 14401 - Audit)	Supervisor, Crew	Ongoing
Tailgate (Storm Water and You)	Supervisor, Crew	Ongoing
Tailgate (Storm Water Pollution Prev. Program)	Supervisor, Crew	Ongoing
Hazardous Waste Operations and Emergency Response	Supervisor, Crew	Ongoing

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.9.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by MWWD in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.9-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.9-5. MWWD External Outreach Activities by Target Audience.

Department Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
Metropolitan Wastewater Collection Division:		
Canyon Watch Program	3,4	Ongoing
Food Establishment Wastewater Discharge Program (FEWD)	3	
Sewer Spill Hotline	1,2,3,4,5	Ongoing
The FOG Program (Fats, Oils and Grease) Brochures, magnets, grease scrapers, pencils, etc.)	3,4,5	Ongoing
Treatment and Disposal Division		
School Education Tours of Treatment Plants	4	Ongoing
Pt. Loma Wastewater Treatment Plant Brochure	2,3,4	Ongoing
South Bay Water Reclamation Plant Brochure	2,3,4	Ongoing
North City Water Reclamation Plant Brochure	2,3,4	Ongoing
Metro Biosolids Center Brochure	1,2,3,4,5	Ongoing
North City Water Reclamation Plant Brochure	1,2,3,4,5	Ongoing
Environmental Monitoring and Technical Services Division		
Industrial Wastewater Control Program (IWCP) Brochure	1,2,3,4,5	Ongoing
Ocean Monitoring Brochure	4,5	Ongoing
Department-wide		
MWWD website	1,2,3,4,5	Ongoing
Informational Videos on MWWD website (17)	1,2,3,4,5	Ongoing
Water/Sewer bill inserts	2,3,4,5	
Metropolitan Wastewater Department Brochure	2,3,4,5	Ongoing
MWWD Energy Fact Sheet	2,3,4,5	Ongoing
MWWD Information Line	1,2,3,4,5	Ongoing
City Hall elevator posters	3,4	Ongoing

6.9.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by MWWD to track expenditures for designing, developing, and implementing BMPs and educational activities. The MWWD annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, “Annual Report Form Questions” for department-specific reporting requirements.

6.10 Recreational Lands and Facilities

6.10.1 Background

This section is applicable to the City's Park and Recreation Department management and employees. The goal of this section is to ensure storm water pollution prevention practices are considered when conducting operation and maintenance activities while enriching lives through quality parks and programs. This section contains storm water best management practices (BMPs) that the Park and Recreation Department will implement for operations and maintenance activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

Maintenance practices at parks, open spaces, and recreation facilities vary and can include fertilizer and pesticide applications, vegetation maintenance and disposal, swimming pool maintenance and draining, trash and debris management, and landscaping. All of these maintenance practices have the potential to contribute pollutants to the storm drain system and receiving waters.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 6.10-1.

Table 6.10-1. Municipal Permit Requirements – Recreational Lands and Facilities.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.10.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities and potential sources of pollutants.
6.10.3	(Pg. 32-34) D. 3. a. (2,3,4,5)	Implement and maintain BMPs.
6.10.4.1	(Pg. 35) D. 3. a. (7)	Inspect municipal areas, activities and implement any necessary follow up actions.
6.10.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.10.4.3	(Pg. 45) D. 5. (b, d);	Implement and designate an educational program for all City personnel and community groups
6.10.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.10.2 Source Characterization

The Park and Recreation Department's facilities inventory includes park facilities and buildings, recreation areas, open spaces, pools, golf courses and a cemetery (see Appendix III, "Municipal Inventory"). Park and Recreation Department activities, their associated potential pollutants, and designated BMPs are listed in Table 6.10-2. The

Park and Recreation Department will update any changes to the facilities inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.10.4.4 "Annual Report Forms."

6.10.3 Best Management Practice Requirements

6.10.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.10.3.1.1 to 6.10.3.1.2 below are the Park and Recreation Department BMPs for operations and maintenance activities. The minimum and activity-specific BMPs identified in this section are documented and implemented via the Park and Recreation Department's Best Management Practices Manual.

If the Park and Recreation Department determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Municipal Code, the Park and Recreation Department will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, the Park and Recreation Department will provide an updated manual to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.10.4.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination."

6.10.3.1.1 Minimum BMPs

The Park and Recreation Department will ensure that all City staff implement the following minimum BMPs, as applicable.

1. Prior to starting activities, <u>locate storm drain system and prevent pollutants from entering.</u> Activity-specific BMPs are listed in Table 6.10-2.
2. <u>Only clean rainwater can be discharged to the storm drain system</u>. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.[1]
3. <u>Sweep up municipal areas after activities and/or spills</u>. Hosing down pollutants into the storm drain is prohibited by Municipal Code Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur after May 1 and before September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately the Park and Recreation Department's responsibility to prevent pollutant discharges to the storm drain system. Therefore, the Park and Recreation Department will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

The Park and Recreation Department will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

6.10.3.1.2 Activity-Specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.10-2 will be implemented during the Park and Recreations Department's operations and maintenance activities by City employees.

Table 6.10-2. BMPs Designated for Areas and Activities at the Park and Recreation Department.

Activity	Potential Pollutants	Best Management Practices
All activities	all	• See Appendix XVIII, "Park and Recreation Department BMPs Manual"
Parking Lot/Structure Maintenance	sediments, trash and debris, oil and grease, metals	• See this activity's BMPs in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping."
Storm Drain System Inspection and Cleaning	sediments, nutrients, trash and debris	• See this activity's BMPs in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping."

6.10.3.2 Additional Controls for Municipal Areas and Activities

The Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in Section 6.10.4.1 "Facilities Inspections and Improvements."

6.10.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.10.4.1 Facility Inspections and Improvements

The Municipal Permit requires that the City inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges. Note: see Section 6.10.4.2, "Pollutant Discharge Notification" below for reporting requirements.

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.10-3, the first inspection will occur before the beginning of the rainy season (during September) and the second

inspection will occur during the rainy season (preferably during January, but prior to April).

Table 6.10-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection the Park and Recreation Department determines that improvements to its BMPs are required, the Park and Recreation Department will perform the action (e.g., repair a structural BMP and/or update the manual), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved (Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection). If the Park and Recreation Department determines that the modifications require additional time or funds to implement, the Park and Recreation Department will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Permit also requires inspections of special events. Park and Recreation Dept. will conduct periodic inspections (no less than once annually) of each category, or type, of special event, to ensure that the Special Event Permit Requirements identified in Appendix VXIII, “park and Recreation BMP manual,” above are effectively being implemented. Park and Recreation staff will note any deficiencies during the inspection and coordinate with the Event Hosts/Organizers to resolve the issue. If potential discharges to the storm drain system are identified during the inspection, Park and Recreation staff will report the potential discharge to the City’s Storm Water Hotline at (619) 235-1000. These inspections will be included in the annual reporting information provided to the Storm Water Pollution Prevention Division each year (see Section 6.10.4.4, below).

The Municipal Facility and Special Event Inspection Forms are attached as Appendix XIV, “Inspection Forms” and are also located on the City’s website.[2]

6.10.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-

[2] http://www.sandiego.gov/thinkblue/resources/index.shtml

case basis by Park and Recreation Dept. and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When Park and Recreation Dept. determines that a discharge poses a significant threat to water quality or human health, Park and Recreation Dept. must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the Park and Recreation Dept. to the Regional Board within five working days of the day the event was identified.

Park and Recreation Dept. will also notify other regulatory agencies as required on Form 304.

6.10.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;

2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, "Education."

6.10.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a "Storm Water and You" training module presented at the "New Employee Orientation" workshop. Staff that do not take the "New Employee Orientation" workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive "refresher" training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via "e-tests" for randomly selected City employees with regular computer access will occur periodically between the mandated "refresher" courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.10.4.3.2 Activity-Specific Training

Municipal Departments

This section describes activity-specific trainings provided by the Park and Recreation Dept. The Park and Recreation Dept. will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 6.10-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.10-4. Activity-specific BMP Training(s) provided by the Park and Recreation Department.

Training Module/Item	Staff Level (i.e., Supervisor, Crew, etc.)	Schedule
Storm Water BMPs as covered in Park and Recreation BMP Handbook (See Appendix X)	All Park and Rec Field Supervisors and Employees	Ongoing

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.10.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Park and Recreation Dept. in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.10-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.10-5. Department External Outreach Activities by Target Audience.

Department/Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
Issuing park permits	Residents who request to reserve parks for their activities	Ongoing
Issuing GDP's (indicating all storm drains) along with the permits if the activity could potentially impact a storm drain	Residents who request to reserve parks for their activities	Ongoing
Issuing department BMPs to the permittee for potential pollutants resulting from the activity	Residents who request to reserve parks for their activities	Ongoing
Issuing GDP's (indicating all storm drains) to consultants/contactors/vendors if the activity they are performing could potentially impact a storm drain	Consultants/contactors/vendors	Ongoing
Issuing department BMPs to consultants/contractors/vendors if the activity they are performing could potentially impact the storm drain	Consultants/contactors/vendors	Ongoing
Distributing outreach materials developed by the Storm Water Program to our recreation centers and permit centers for their counters, bulletin boards, and/or literature racks containing materials available to the general public who enter the facility	General public who enter the recreation facilities or who apply for permits	Ongoing

6.10.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by Park and Recreation Department to track expenditures for designing, developing, and implementing BMPs and educational activities. The Park and Recreation Department's annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

6.11 Solid Waste Management

6.11.1 Background

This section is applicable to the Environmental Services Department (ESD) which operates and manages the collection, reduction, and disposal of solid waste within the City of San Diego. Services provided by ESD include the collection of refuse and recyclable wastes, solid waste and hazardous waste code enforcement activities, and educating the public and businesses on recycling options. Additionally, ESD is responsible for operating and maintaining the Miramar Landfill and seven inactive landfills. The goal of this section is to reduce the impact of the ESD's operations and maintenance activities on storm water quality and provide guidance for the protection of water quality and receiving waters. This section contains the storm water best management practices (BMPs) the ESD will implement during department operations and maintenance activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

ESD's facilities operation and maintenance programs must meet the requirements of the Municipal Storm Water Permit (Order R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 6.11-1.

Table 6.11-1. Municipal Permit requirements – Solid Waste Management.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.11.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities and potential sources of pollutants.
6.11.3	(Pg. 32-34) D. 3. a. (2,3,4,5)	Implement and maintain BMPs.
6.11.4.1	(Pg. 35) D. 3. a. (7)	Inspect municipal areas, activities and implement any necessary follow up actions.
6.11.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.11.4.3	(Pg. 45) D. 5. (b, d);	Implement and designate an educational program for all City personnel.
6.11.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.11.2 Source Characterization

The Environmental Services facilities inventory includes the "Green" Ridgehaven building, inactive and active landfills, and Miramar Place (see Appendix III, "Municipal Inventory"). ESD activities, their associated potential pollutants, and designated BMPs are listed in Table 6.11.2. ESD will update any changes to the inventory, activities,

and/or BMPs on an annual basis as part of the reporting process described in Section 6.11.4.4, "Annual Report Forms."

6.11.3 Best Management Practice Requirements

6.11.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.11.3.1.1 to 6.11.3.1.2 below are the ESD's BMPs for operations and maintenance for solid waste activities. The minimum and activity-specific BMPs identified in this section are documented and implemented via ESD's standard operating procedures (SOPs).

If ESD determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Municipal Code, ESD will modify its activities or enhance BMPs to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, ESD will provide updates to its SOPs to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.11.4.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination."

6.11.3.1.1 Minimum BMPs

ESD will ensure that all City staff implements the following minimum BMPs, as applicable.

1. Prior to starting activities, <u>locate storm drain system and prevent pollutants from entering.</u> Activity-specific BMPs are listed in Table 6.11-2.
2. <u>Only clean rainwater can be discharged to the storm drain system</u>. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.[1]
3. <u>Sweep up municipal areas after activities and/or spills</u>. Hosing down pollutants into the storm drain is prohibited by Municipal Code Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.
4. <u>Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris</u> or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

any necessary cleanings must occur after May 1 and before September 30 each year.

5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately ESD's responsibility to prevent pollutant discharges to the storm drain system. Therefore, ESD will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

ESD will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

6.11.3.1.2 Activity-Specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.11-2 will be implemented by ESD in its operations and maintenance of solid waste management activities.

Table 6.11-2. BMPs designated for areas and activities associated with Solid Waste Management.

Activity	Potential Pollutants	Best Management Practices
Community Cleanup Events	trash and debris, oxygen demanding substances, oil and grease, pesticides	• Curb Style Events – Code Enforcement and supervisory staff will carry spill kits on their vehicles. • Bin Style Events – move material private vehicle to bin or packer. Return site to original condition when finished. • Survey area after the event and dispose of any trash or debris to the landfill.
Christmas Tree Recycling	trash and debris, oxygen demanding substances	• Use bags and straw wattles protect storm drains inlets. • When servicing sites, maintain and return to original condition.
Hazardous Waste Storage Area	nutrients, trash, oil and grease, pesticides, metals	• Store wastes are stored inside a designated chemical storage area, if inside. • Store wastes in secondary containment, designated storage area, or on pallets and covered as necessary if outside during the rainy season.
Hazardous Materials Storage Area	nutrients, trash, oil and grease, pesticides, oxygen demanding compounds, metals	• Store materials in a Connex box or covered.
Storm Drain System Inspection and Cleaning	trash and debris	• Annually inspect and clear all storm drain systems of debris or other foreign material. Storm drain system inspections and any necessary cleaning must occur between May 1 and September 30 each year. • When practical, work is to be done when conditions are dry. • Remove trash and debris from open channels and inlets and properly dispose of these materials. • Conduct annual visual inspections during the dry season especially if there are problem storm drain inlets where sediment/trash or other pollutants accumulate. • Conduct field investigations to detect and eliminate improper disposal of pollutants into the storm drain system (eg. identify problem areas where discharges or illegal connections may occur and follow up stream to determine the source(s)). • Inspect and clear drainage facilities as needed during wet weather.
Refuse Dumpsters	trash and debris	• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"

Activity	Potential Pollutants	Best Management Practices
Landscaping	pesticides, nutrients, sediments	• Schedule chemical application at times when rain is not predicted and irrigation is not scheduled. • Apply and handle pesticides and keep detailed records in accordance with existing state regulations (California Title 3, Division 6, "Pesticides and Pest Control Operations"). • Collect and dispose of unused chemicals as a regulated waste.[2] • Use native plants when possible. • Keep removed vegetation, including clippings, chips, loose soils, and pruning debris away from storm drain inlets and watercourses. • Consider applying compost instead of chemical fertilizers. • Rely on integrated pest management methods, including: o No controls o Physical/mechanical controls o Environmental controls (mulching, pest-resistant vegetation, prescribed burns) o Biological controls (predators, parasites, etc.) o Less toxic chemical controls (e.g., soaps and oils) and/or hot water • If absolutely necessary, use the least toxic chemicals that will do the job (e.g., biodegradable products). Avoid use of copper-based pesticides.
Parking Lot/Structure Maintenance	trash and debris, oil and grease	• Sweep and/or vacuum parking lot 1 x month • Use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste.[3] • Keep lids closed on solid waste cans and dumpsters at all times. Provide enough solid waste cans/dumpsters in all appropriate areas. • Use plastic liners in trash and recycling receptacles in front of building.
Last Chance Recycling	trash and debris, metals, oxygen demanding substances	• Protect storm drain inlets with straw wattles. • Use all weather treatment for tipping deck and vehicular ingress/egress surfaces.
Fire Sprinkler Flushing	sediments, nutrients	• Collect water in 5 gallon buckets and dispose of in sewer system.
Heavy Equipment at Landfill	oil and grease	• See Landfill Equipment Fluid Releases; Fueling Nozzle Leaks; and Hazardous Materials Spill Response and Reporting SOPs in Appendix XIX. • Use drip pans and absorbent pads. • Maintenance contractor maintains regulatory compliance and practices good housekeeping techniques.

[2] Contact ESD HMMP for instructions.
[3] Contact ESD-HMMP for disposal options.

Activity	Potential Pollutants	Best Management Practices
Landfill Operations	sediments, nutrients, trash and debris and oil and grease, bacteria and viruses	• Compact all solid waste cover daily. No water is allowed to stand on any landfill cover. • Apply mulch onto slope, intermediate cover areas, and stockpiles. • Revegetate when operationally feasible. • Pump down sedimentation basin between storm events. • Apply tackifier to exposed cut/fill areas. • See "Inclement Weather; General Site Maintenance; Litter Control; and Leachate Disposal SOPs" in Appendix XIX.
Greenery Operations	sediments, nutrients, trash and debris and oil and grease, bacteria and viruses	• Divert run-on around the site. • Cover bare areas with mulch/compost. • Haul trash contaminated or unsuitable materials to the landfill. • Maintain adequate windrow temperatures and moisture content. • Finished product is stored upgradient of raw product. • Ensure equipment that is used to handle finished product is free of any residue of raw product. • See "Inclement Weather; General Site Maintenance; Litter Control; Windrow Building Operations; and Fecal Contamination Prevention SOPs" in Appendix XIX.
Landfill Gas Collection	sediment, metals, organic compounds	• Systems maintained to collect and properly dispose of landfill gas condensate. • Materials for maintenance are stored in connex box or covered.
Inactive landfills	sediments, nutrients, trash and debris	• Cover bare spots with mulch/compost. • Install silt fences, wattles, geotextiles, rock rip rap, energy dissipaters or other BMPs as applicable. • Revegetate as necessary. • Maintain deck and slope surfaces for proper drainage. • See "Minor and Major Grading and NPDES – Drainage Improvements SOPs" in Appendix XIX.
Native Plant Nursery	sediments, nutrients, pesticides	• Utilize computerized watering system, and closely monitor hand watering to avoid water run off.
Material Loading/Unloading		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Handling/Storage and Disposal		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Irrigation Repair		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Vehicle and Equipment Fuel Dispensing Areas		• See this activity's BMPs in Table 6.15-2 Section 6.15, "Vehicle Maintenance/Operations Yards."

6.11.3.2 Additional Controls fro Municipal Area and Activities

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to

this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in Section 6.11.4.1 “Facilities Inspections and Improvements.”

6.11.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.11.4.1 Facility Inspections and Improvements

This section applies to ESD which maintains its own buildings, grounds and the active and inactive landfills. The Municipal Permit requires that the City inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges (Note: see Section 6.11.4.2, “Pollutant Discharge Notification” below for reporting requirements).

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.11-3, the first inspection will occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.11-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection ESD determines that improvements to its BMPs are required, ESD will perform the action (e.g., repair a structural BMP and/or update the SOPs), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved (Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection). If ESD determines that the modifications require additional time

or funds to implement, ESD will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Facility Inspection Forms are attached as Appendix XIV, "Inspection Forms" and are also located on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml.

6.11.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by ESD and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When ESD determines that a discharge poses a significant threat to water quality or human health, ESD must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the ESD to the Regional Board within five working days of the day the event was identified.

ESD will also notify other regulatory agencies as required on Form 304.

6.11.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, “Education.”

6.11.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.11.4.3.2 Activity-Specific Training

Municipal Departments

This section describes activity-specific trainings provided by ESD. ESD will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 6.11-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.11-4. Activity-Specific BMP Training(s) Provided by ESD.

Training Module/Item	Staff Level (i.e., Supervisor, Crew, etc.)	Schedule
Support Services		
Hazardous Material Handling	Supervisor, Crew	Annual
CRT Management and Handling	Supervisor, Crew	Ongoing
Handling and Management of Universal Waste	Supervisor, Crew	Ongoing
Managing Materials Associated with Community Cleanups	Supervisor, Crew	Ongoing
Management of Vehicle Batteries (illegal dump and community cleanups)	Supervisor, Crew	Ongoing
HSET		
Review BMPs for hazardous waste storage area	Supervisor, Crew	6/13/07
Facility Maintenance Staff And Vendors		
Storm Drain Maintenance (internal staff and vendor)	Supervisor, Crew	Spring 2008
Parking Lot Maintenance (internal staff and vendor)	Supervisor, Crew	Spring 2008
Litter and Recycling Container Storage Area Maintenance (internal staff)	Supervisor, Crew	Spring 2008
Proper Fire Sprinkler Flushing Disposal (vendor)	Supervisor, Crew	Spring 2008
Landscape and Irrigation Maintenance (vendor)	Supervisor, Crew	Spring 2008
Fountain Maintenance (internal staff)	Supervisor, Crew	Spring 2008
Disposal Staff		
Standard Operating Procedures (SOPs)	Supervisor, EMS manager	Ongoing
BMP installation	Supervisor	Ongoing
Nursery operations	Supervisor	Ongoing

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.11.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by ESD in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.11-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.11-5. Department External Outreach Activities by Target Audience.

Department/Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Available
Think Blue informational materials on display in Environmental Services Foyer information rack	1,2,3,4,5	Summer 2008
Storm Water related article placement in *Curbsider Newsletter*	1,2,3,4,5	Winter 2008

6.11.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by Environmental Services Department to track expenditures for designing, developing, and implementing BMPs and educational activities. ESD's annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

6.12 *Special Events*

6.12.1 Background

This section is applicable to the Office of Special Events, Community which issues permits for special events as defined by the San Diego Municipal Code §22.4. The goal of this section is to reduce the impact of special events on storm water quality. It contains storm water best management practices (BMPs) the Office of Special Events will implement, in addition to source identification, inspection, pollutant discharge reporting, education and annual reporting requirements.

The Office of Special Events provides a number of event-related services. The primary function is to provide permits for events that occur on public property. Typical events for which the Office of Special Events provide permitting services include runs, walks, triathlons, festivals, and parades. In addition, the Park and Recreation Department, Water Department, and Qualcomm Stadium staff issue special event permits for activities taking place on land managed by these departments and are addressed in other Jurisdictional Urban Runoff Management Plan (URMP) sections. In general, any organized activity involving the use of, or having impact upon, public property, public facilities, parks, beaches, sidewalks, street areas, or the temporary use of private property in a manner that varies from its current land use, requires a special event permit.

The City's programs must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 6.12-1.

Table 6.12-1. Municipal Permit Requirements – Special Events.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.12.3	(Pg. 33) D. 3. a. (2)(f)	Require implementation of BMPs at special events.
6.12.4	(Pg. 35) D. 3. a. (7)	Inspect special event venues following the events and implement any necessary follow-up actions.
6.12.4.2	(Pg B-6) Attachment B.5.(e)	Report pollutant discharges to the storm drain system or receiving waters to the Storm Water Division and San Diego Regional Water Control Board (Regional Board).
6.12.4.3	(Pg. 44) D.5.a.(1); (Pg. 45) D.5.b. (1) (d)	Implement an educational program for City personnel and appropriate audiences at special events.
6.12.4.4.and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J.3.a.(c,g,j); (Pg. 51) G.3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.12.2 Source Characterization

Although special events permitted by the City occur on City property, the special event itself is not considered a “municipal facility” or “municipal area” in the municipal inventory under the Municipal Permit.

6.12.3 Best Management Practice Requirements

6.12.3.1 Updated BMP Requirements

BMPs identified in Section 6.12.3.2 below are the BMPs that the Office of Special Events will ensure are included in the special event permit application language.

It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. Departments may improve or modify these BMPs at any time if they determine it will improve their operations. Whenever the BMPs are improved or revised, the Office of Special Events will provide updates to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.12.4.4).

6.12.3.2 BMPs in Special Event Permits

Table 6.12-2. BMPs Designated for the Office of Special Events.

Activity	Potential Pollutants	Best Management Practices
Special Event Permitting	Any	• Report discharges to the storm drain system at special events to the City’s Storm Water Hotline, (619) 235-1000. • Follow the 24-Hour Significant Discharge Reporting procedures outlined in Section 6.12.4.2, below. • Review special event permits and when applicable, require the appropriate conditions listed in the “Special Event Permit Application Language” below in special event permit applications. **<u>Special Event Permit Application Requirements:</u>** All City-wide Special Event Permit Applicants will be required to: 1. Identify Storm Drains Impacted by Event Identify the location of all the storm drains inside, or adjacent to the perimeter of the proposed event venue. Clearly mark the location of each storm drain on your Site Plan or Route Map. Applicants are encouraged to use the symbol provided by the Office of Special Events. Large-scale events with the potential to generate pollutants outside of the proposed event venue perimeter may be required to identify additional storms drains that could be impacted by event-related activities. 2. Accept Terms of General Compliance Statement:

Activity	Potential Pollutants	Best Management Practices
		In submitting this City-wide Special Event Permit Application, the event Host and/or Organizer agrees to comply with all storm water discharge regulations as governed by the City of San Diego Municipal Code §43.0301, "*Stormwater Management and Discharge Contro*l." Under the Storm Water Management and Discharge Control Ordinance, it is illegal to discharge pollutants into the City's storm drain system. Failure to prevent illegal discharges can result in fines up to $10,000 per day, per violation. The Host and/or Organizer shall implement the BMPs identified in this permit application and shall notify Office of Special Events staff in the event of a pollutant discharge to the storm drain system. However, please note that it is ultimately the Host and/or Organizer's responsibility to prevent pollutant discharges to the storm drain system. Therefore, the Host and/or Organizer shall be responsible for identifying and implementing any additional BMPs that may be necessary to avoid discharging pollutants into the storm drain system. 3. Identify/Describe Storm Water Best Management Practices (BMPs) to be used at the event. Suggested BMP options include, but are not limited to the following. Please note that if the suggested BMPs are not selected, the Event Host and/or Organizer must propose equivalent BMPs, satisfactory to the Office of Special Events. A. Outreach Event Hosts/Organizers are encouraged to train event staff, vendors, attendees, and other participants in storm water pollution prevention activities at the event venue and to notify all vendors of their storm water pollution prevention responsibilities. B. Storm Drain Protection Event Hosts/Organizers are encouraged to develop appropriate strategies to protect all storm drains identified on their site plans including all storm drains inside, or adjacent to the perimeter of the proposed event venue. Pollution Prevention Strategies may include, but are not limited to: I. Provision of signage in visible areas throughout the event venue stating: "Do not pour liquids or place trash into the storm drain. Violators will be subject to fines/ No tire líquidos ni basura en los desagües. Violadores serán multados" II. Placement of food, craft, portable restrooms and other activities that may generate pollutants in areas significantly distanced from storm drains. III. Provision of spill kits comprised of paper towels, cloth towels, kitty litter and/or sand in all areas where food, beverages, craft/creative areas as well as where chemical or liquid activities or products such as portable restrooms may be placed within or adjacent to the event venue.

Activity	Potential Pollutants	Best Management Practices
		All spill materials must be picked up out of the public right of way once the spilled material is absorbed off the ground. Spills leaving the event venue area into the surrounding streets must be captured and prevented from entering the surrounding non-event area(s) and storm drains. IV. Placement of plastic sheeting (e.g. visqueen) or other material over storm drain openings to preclude the discharge of pollutant/liquids into the storm drain. Any materials used to block a storm drain must be removed from the venue site upon conclusion of the event dismantle process. THIS STRATEGY TO BE USED ONLY IF THERE IS NO RAIN PROJECTED DURING THE EVENT TIME FRAME. DO NOT block a storm drain or use other BMPs that may create a potential for flooding if there is a chance of rain forecasted during the event time frame (including set-up and dismantle). V. Venue Housekeeping a. Provision of adequate personnel assigned to the collection of loose trash and debris throughout the event time frame including set-up and dismantle. b. Sweeping of all venue and related areas such as parking and production sites. Use wet mops to remove any temporary public art (chalk, paint, charcoal, clay, etc.) at the conclusion of the event. c. Ensure that any water used during the event (e.g., cooler water, mop water, food prep water, etc.) is either poured down a sink or released over a landscaped area with adequate capacity to contain the liquids and pollutants off the sidewalks, curbs, gutters, streets, and drains. d. DO NOT power wash or rinse event residue within your event venue unless all wash water is captured and disposed of in a sanitary sewer or released over a landscaped area with adequate capacity to contain the liquid and pollutants. VI. Other Many special events have unique event components and operational circumstances. Please describe any additional or alternative storm drain protection strategies that you plan to use.

6.12.3.2 Additional Controls for Municipal Areas and Activities

The Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this

requirement). The additional BMPs that fulfill this requirement have been incorporated in Table 6.12-2.

6.12.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.12.4.1 Inspections

As required by the Municipal Permit, the Office of Special Events will conduct periodic inspections (no less than once annually) of each category, or type, of special event, to ensure that the Special Event Permit Requirements identified in Section 6.12.3.2, above are effectively being implemented. Office of Special Events staff will note any deficiencies during the inspection and coordinate with the Event Hosts/Organizers to resolve the issue. If potential discharges to the storm drain system are identified during the inspection, Office of Special Events staff will report the potential discharge to the City's Storm Water Hotline, (619) 235-1000. These inspections will be included in the annual reporting information provided to the Storm Water Pollution Prevention Division each year (See Section 6.12.4.4, below).

6.12.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the Regional Water Board. A significant threat to water quality or human health is determined on a case-by-case basis by Airports Division and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance <u>and</u> enter the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and

removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When Airports Division determines that a discharge poses a significant threat to water quality or human health, Airports Division must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the Airports Division to the Regional Board within five working days of the day the event was identified.

Departments must also notify other regulatory agencies as required on Form 304.

6.12.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, "Education."

6.12.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to

storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.12.4.3.2 Activity-Specific Training

Municipal Departments

This section describes activity-specific trainings provided by the Airports Division. The Airports Division will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 6.12-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.12-4. Activity Specific BMP Training(s) Provided by the Special Events.

Training Module/Item	Staff Level (i.e., Supervisor, Crew, etc.)	Available]
Training Video	City wide Special Events Management team	July 2008

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.12.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Airports Division in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.12-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.12-5. Department External Outreach Activities by Target Audience.

Dept Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule

All Special Event Sections and Groups		
1. Customer Video – "Storm Water Protection at Special Events. Delivered to customer by: o Website o On line application o Applicant workshop(s)	3,4,5	ongoing

6.12.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by departments to track expenditures for designing, developing, and implementing BMPs and educational activities. The Office of Special Events' annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 of each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

6.13 Stadium

6.13.1 Background

This section is applicable to the City's Qualcomm Stadium ("the Stadium") management and employees, and any lessees or vendors who operate at Jack Murphy Field (Qualcomm Stadium and Jack Murphy Field are hereinafter referred to as "the Stadium).The goal of this section is to reduce the impacts of the Stadium events and operations on water quality in the San Diego River watershed. This section contains storm water best management practices (BMPs) the Stadium will implement for operations and maintenance activities, in addition to inventory, inspection, pollutant discharge reporting, education and annual reporting requirements.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No.R9-2007-0001 "Municipal Permit," see Appendix I), as described in Table 6.13-1.

Table 6.13-1. Municipal Permit Requirements – Stadium.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.13.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities and potential sources of pollutants.
6.13.3	(Pg. 32-34) D. 3. a. (2,3,4,5)	Implement and maintain BMPs.
6.13.4.1	(Pg. 35) D. 3. a. (7)	Inspect municipal areas, activities and implement any necessary follow up actions.
6.13.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.13.4.3	(Pg. 45) D. 5. (b, d);	Implement and designate an educational program for all City personnel and contractors.
6.13.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.13.2 Source Characterization

The Stadium is a municipal facility located at 9449 Friars Road, San Diego. This facility is included in the municipal inventory (see Appendix III "Municipal Inventory"). The Stadium's activities, its associated potential pollutants, and designated BMPs are listed in Table 6.13-2. The Stadium will update any changes to its activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.13.4.4, "Annual Report Form Questions."

6.13.3 Best Management Practices Requirements

6.13.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.13.3.1.1 to 6.13.3.1.2 below are the Stadium's minimum and activity specific BMPs for operations and maintenance activities.

If the Stadium determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Municipal Code, the Stadium will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, the Stadium will provide updates to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.13.4.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination".

6.13.3.1.1 Minimum BMPs

The Stadium will ensure that all City staff implement the following minimum BMPs, as applicable.

1. Prior to starting activities, locate storm drain system and prevent pollutants from entering. Activity-specific BMPs are listed in Table 6.13-2.
2. Only clean rainwater can be discharged to the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.[1]
3. Sweep up municipal areas after activities and/or spills. Hosing down pollutants into the storm drain is prohibited by Municipal Code Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.
4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur after May 1 and before September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately the Stadium's responsibility to prevent pollutant discharges to the storm drain system. Therefore, the Stadium's will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

The Stadium will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

6.13.3.1.2 Activity-Specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.13-2 will be implemented by City staff during the Stadium's operations and maintenance activities.

Table 6.13-2. BMPs Designated for Areas and Activities at the Stadium.

Activity	Potential Pollutants	Best Management Practices
Refuse Dumpsters	Sediments, Trash and debris	• For large events with crowds that exceed 25,000, three yard and five yard front loaded dumpsters will be placed throughout the parking lot and will be emptied beginning three hours after the event. • For events with crowds less than 25,000, three yard and five yard dumpsters will be emptied within 24 hours after the event ends.

Activity	Potential Pollutants	Best Management Practices
Vehicle Washing	Sediment, oil and grease, metals	• City staff will wash the city vehicles at the car washes located in the operations yards. • All Parking Lot Event permits contain language prohibiting vehicle washing as per SD Municipal Code 43.0301.
Soil Stockpile Maintenance	sediments	• Tackify soil once a year • Place sandbags around perimeter of stockpile.
Stadium Wash-down Cleaning	Sediments, metals, trash and debris,	• Use street sweeper in conjunction with wash- down to capture all water.
Field Painting	Sediments, nutrients, metals, organic compounds, pesticides	• Mix paints in the east tunnel. • Secure all lids tightly during transport and storage. • Clean all equipment iin the east tunnel
Special Event Permitting	Any	<u>General Compliance Statement:</u> Contracts shall agree to the following statement: In submitting this Event Permit, the event Host and/or Organizer agree to comply with all storm water discharge regulations as governed by the City of San Diego Municipal Code §43.03, "*Stormwater Management and Discharge Control*". Identify the location of all the storm drains inside the event area. Clearly mark the storm drain on your venue Site Plan submitted with the Permit application. <u>Standard BMPs:</u> Event Organizers are encouraged to train event staff in storm water pollution prevention activities at the event venue and to notify all vendors of their storm water pollution prevention responsibilities. Required Storm Water Best Management Practices (BMPs): 1. *Food and beverage, and all chemical and liquid activities or products*: Event Hosts/Organizers and vendors must have spill kits in or adjacent to their work area. Spill kits include: paper towels, cloth towels, kitty litter and/or sand. All spill materials must be picked up out of the public right of way once the spilled material is absorbed off the ground. Spills leaving the event venue area into the surrounding property must be captured and prevented from entering the surrounding non-event area(s) and storm drains. 2. *Storm Drain Protection:* Event Hosts/Organizers must protect all storm drains identified on their site plans. A) Dry: if no rain is projected, place fabric filters over the drain opening and hold them in place with duct tape or gravel bags protecting the perimeter of the drain. The gravel must be clean and free of sediment.

Activity	Potential Pollutants	Best Management Practices
		B) Rain: If a 40 percent chance or greater of rain is forecasted, gravel bags protecting the storm drain perimeter is sufficient. Do not use fabric filters in the event of rain. 3. *Post Event markings Removal:* All event areas where temporary chalk, paint or other marking materials are used to identify spaces, locations, travel pathways, etc. must have spill kits on hand (see No 1 above). Post event clean-up of these areas includes removal of temporary markings (chalk, paint, charcoal, clay, etc). Event/vendor staff must use wet-mops. Any water in a bucket must be either poured into the sanitary sewer via for example a sink, or released over a landscaped area that has adequate capacity to contain the liquids and the pollutant without allowing discharge onto any water impervious area, sidewalks, curbs, gutters streets and drains. 4. *Trash and Debris:* A) Adequate trash containers must be provided throughout the event venue, including at the exit and entry points. Regular collection of renegade trash and debris is required. B) If a trash and or recycling collection area is established, spill kits and wet mop(s) and brooms must be available and staff trained in spill clean-up methods. Post event sweeping of the venue and related staging areas.
Building Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Parking lots/structures maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Landscaping		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Materials Handling, Storage, and Disposal		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Loading and Unloading		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Storm drain system inspection and cleaning		• See this activity's BMP in Table 6.3-2, Section 6.3 "Buildings/Parking/Landscaping"

Activity	Potential Pollutants	Best Management Practices
Vehicle Equipment Maintenance		• See this activity's BMPs in Table 6.15-2 Section 6.15, "Vehicle Maintenance/Operations Yards"
Vehicle and Equipment Fuel Dispensing Areas		• See this activity's BMPs in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yards"

6.13.3.2 Additional Controls for Municipal Area and Activities

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in Section 6.13.4.1 "Facilities Inspections and Improvements".

6.13.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.13.4.1 Facility Inspections and Improvements

The Municipal Permit requires that the City inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges. Note: see Section 6.13.4.4, "Pollutant Discharge Notification" below for reporting requirements.

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.13-3, the first inspection will occur before the beginning of the rainy season (during September) and the second

inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.13-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection the Stadium determines that improvements to its BMPs are required, the Stadium will perform the action (e.g., repair a structural BMP), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved (Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection). If the Stadium determines that the modifications require additional time or funds to implement, the Stadium will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Permit also requires inspections of special events. The Stadium will conduct periodic inspections (no less than once annually) of each category, or type, of special event, to ensure that the Special Event Permit Requirements identified in Table 6.13.2, above are effectively being implemented. Stadium staff will note any deficiencies during the inspection and coordinate with the Event Hosts/Organizers to resolve the issue. If potential discharges to the storm drain system are identified during the inspection, Stadium staff will report the potential discharge to the City's Storm Water Hotline, (619) 235-1000. These inspections will be included in the annual reporting information provided to the Storm Water Pollution Prevention Division each year (see Section 6.13.4.4, below).

The Municipal Facility Inspection Forms and Special Event Inspection Forms are attached as Appendix XIV "Inspection Forms" and are also located on the City's website at http://www.sandiego.gov/thinkblue/resources/index/shtml

6.13.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by The Stadium and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-

storm water substance and enter the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When The Stadium determines that a discharge poses a significant threat to water quality or human health, The Stadium must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the Stadium to the Regional Board within five working days of the day the event was identified.

The Stadium will also notify other regulatory agencies as required on Form 304.

6.13.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, "Education."

6.13.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.13.4.3.2 Activity-Specific Training

Municipal Departments

This section describes activity-specific trainings provided by the Stadium. the Stadium will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 6.13-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.13-4. Activity Specific BMP Training(s) Provided by the Stadium.

Training Module/Item	Staff Level (i.e., Supervisor, Crew, etc.)	Available
How to train Employees regarding BMPs for Stadium seat cleaning	Supervisor, Crew	Spring 2008
Parking lot cleanup BMPs	Supervisor, Crew	Summer 2009
Equipment cleaning BMPs	Crew	Summer 2009
Pesticide/Chemical application BMPs for Stadium fields and landscaping	Supervisor, Crew	Summer 2009
Soil Storage and Stabilization	Supervisors	Spring 2008

Training Module/Item	Staff Level (i.e., Supervisor, Crew, etc.)	Available
Vendor Disposal BMPs	Contractors and Vendors	Summer 2008

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.13.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Stadium in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.13-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.13-5. Department External Outreach Activities by Target Audience.

Department / Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children Under-represented audiences in 1-4	Available
1. Visitor information provided and posted in various locations on proper disposal of trash	4	Ongoing
2. BMPs for stadium vendors	3	Summer 2008
3.Think Blue message on Friars Rd. Marquis	1-5	Summer 2008
4. Provide vendors and contractors access to Stadium activity specific BMPs	1,3,4	Ongoing

6.13.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by the Stadium to track expenditures for designing, developing, and implementing BMPs and educational activities. The Stadium annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, “Annual Report Form Questions” for department-specific reporting requirements.

6.14 Streets/Storm Drain Conveyance System

6.14.1 Background

This section is applicable to the General Services Department, Street Division which owns, operates, and maintains the streets and storm drain systems of San Diego. The goal of this program is to reduce the impact of streets and storm drain operations and maintenance activities on storm water quality in the San Diego region. This section contains storm water best management practices (BMPs) the Street Division will implement for street and storm drain systems operations and maintenance activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 6.14-1.

Table 6.14-1. Municipal Permit Requirements – Streets and Storm Drain Conveyance System.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.14.2	(Pg. 32) D. 3. a. (1); (Pg. 42) D.4.b.	Inventory municipal areas, activities and potential sources of pollutants.
6.14.3	(Pg. 32-34) D. 3. a. (2,3,4,5,6)	Implement and maintain BMPs.
6.14.4.1	(Pg. 35) D. 3. a. (7)	Inspect municipal areas, activities and implement any necessary follow up actions.
6.14.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.14.3	(Pg. 45) D. 5. b. (1) (d)	Implement and designate an educational program for all City personnel and contractors.
6.14.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.14.2 Source Characterization

The Street Division inventory includes the buildings and operations yards that the division occupies (see Appendix III,"Municipal Inventory"). Additionally, Street Division uses GIS to identify the locations of the storm drain system for the City of San Diego (see Appendix IV, "Storm Drain System Map"). Street Division's activities, their associated potential pollutants, and designated BMPs are listed in Table 6.14-2. Street Division will update any changes to the streets and storm drain system facilities inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.14.4.4, "Annual Report Forms."

6.14.3 Best Management Practice Requirements

6.14.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.14.3.1.1 to 6.14.3.1.2 below are Street Division's BMPs for operations and maintenance activities.

If the Street Division determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Municipal Code, the Street Division will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, the Street Division will provide updates to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.14.4.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination."

6.14.3.1.1 Minimum BMPs

The Street Division will ensure that all City staff implement the following minimum BMPs, as applicable.

1. Prior to starting activities, locate storm drain system and prevent pollutants from entering. Activity-specific BMPs are listed in Table 6.14-2.
2. Only clean rainwater can be discharged to the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.[1]
3. Sweep up municipal areas after activities and/or spills. Hosing down pollutants into the storm drain is prohibited by Municipal Code Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.
4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur after May 1 and before September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately the Street Division's responsibility to prevent pollutant discharges to the storm drain system. Therefore, the Street Division and/or contractors will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

The Street Division will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

6.14.3.1.2 Activity-Specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.14-2 will be implemented during the Street Division's operations and maintenance activities by City employees.

Table 6.14-2. BMPs Designated for Areas and Activities Related to Street and Storm Drain System Maintenance.

Activity	Potential Pollutants	Best Management Practices
Sweeping Municipal Areas (sweeping of improved streets, possessing a curb and gutter. municipal roads,	sediments, trash and debris	• Collect sweeping debris and contain in a temporary storage area and protected from storm water runoff. • Dispose of sweeping debris through an approved disposal facility. • Clean sweepers at the wash rack area in Chollas Operations Yard.

<table>
<tr><th>Activity</th><th>Potential Pollutants</th><th>Best Management Practices</th></tr>
<tr><td>streets, highways and parking facilities).</td><td></td><td>

- Discharge wash water to the sanitary sewers through the oil/water separator.

Sweeping Schedule
(Based on each street's historical debris volumes collected)

<table>
<tr><th>Debris Volume</th><th>Frequency</th></tr>
<tr><td>1. High</td><td>Twice/month</td></tr>
<tr><td>2. Moderate</td><td>Monthly</td></tr>
<tr><td>3. Low</td><td>Once/year</td></tr>
<tr><td>4. "Unimproved Roads" (roads that lack curb and gutter)</td><td>As needed</td></tr>
</table>

</td></tr>
<tr><td>Storm Drain System Inspection and Cleaning (including flood control devices)</td><td>sediments, nutrients, trash and debris</td><td>

- When practical, perform work when conditions are dry.
- Vacuum water runoff and/or remove any silt build up from activity.
  - Use acceptable vacuum; e.g. Wet/dry shop vacuum or large hydro-flusher vacuum machine.
  - Remove water or material to approved dumping site (see Material/Debris Disposal below).

Storm Drain System Inspection/Cleaning Schedule
(Based on each storm drain structure history debris volume collected)

<table>
<tr><th>Debris Volume</th><th>Frequency</th></tr>
<tr><td>1. High</td><td>Annually, between May 1 and September 30.*</td></tr>
<tr><td>2. Other (medium/low)</td><td>Annually at any time during the year.*</td></tr>
</table>

* Following two years of inspections, any storm drain structure that does not contain debris when inspected may be inspected as needed, but not less than every other year.

- Dispose of debris through an approved disposal facility.

</td></tr>
<tr><td>Storm Drain System Structural Treatment Control Inspection and maintenance</td><td>sediments, nutrients, trash and debris</td><td>

- BMPs are cleaned in September and/or March according to the specifications of the manufacturer.
- BMPs are inspected twice a year.

</td></tr>
<tr><td>Cleaning Storm Drains from Private Lateral Spills</td><td></td><td>

TO BE DETERMINED
- Street Division will remove the sewage from the storm drain system, if crews available.
- If Street Division crews are unavailable, a contractor will be called out to remove the sewage from the storm drain system.

</td></tr>
</table>

Activity	Potential Pollutants	Best Management Practices
Pipe Replacement	sediment	• When practical, work is to be done when conditions are dry. • Prior to beginning activity, locate storm drains, visually inspect and remove debris. • If possible, move activity away from storm drain. • Protect storm drains if there is any chance pollutants could enter. 1. For solid pollutants, use sand or gravel bags and/or fiber rolls 2. For liquid pollutants, use absorbent socks, pads or containment booms. • Vacuum water runoff and/or remove any silt build up from activity. 1. Use acceptable vacuum; e.g., wet/dry shop vacuum or large hydro-flusher vacuum machine. 2. Remove water or material to approved dumping site (see Material/Debris Disposal below). • At the conclusion of work activity, visually inspect storm drains and clean where necessary. Remove temporary BMP's.
Street/Road/Highway Repair and Maintenance	oil and grease, metals, sediment, trash and debris, organic compounds	• Schedule asphalt and concrete for dry weather. • Sweep area after materials are broken up. • Cover and seal nearby storm drains systems and manhole covers prior to applying seal coat, slurry seal, etc. Remove covers when job is complete. • Use as little water as possible. • Ensure shut off valves are working properly. • When job is complete, clean up, sweep area, if needed, and remove stockpiles.
Painting and Paint Removal for Bridge Maintenance	organic compounds, sediment,	• If painting near or over a watercourse, use netting or traps to capture pollutants.
Stockpile Yard Maintenance	sediment, trash and debris, nutrients	• Filter rain water through gravel bags into a desilting structure. • Remove waste material that has accumulated in the desilting structure with a vactor truck and dispose of through an approved disposal site.
Low Flow Diversion System Operation and Maintenance	bacteria and viruses, trash and debris, oxygen demanding compounds,	• Clean valves, vaults, interceptor stations, sump pumps, meter equipment, and wet and dry wells to prevent pollutants from entering receiving waters. • Close upstream and downstream valves during cleaning and repairs. • Clean debris from open channels at interceptor stations. • Dispose of debris at spoil bins, landfill, or as regulated waste when appropriate. • See Appendix XIII "Annual Report Form Questions" for data tracking requirements.
Median/Road Embankment Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"

Activity	Potential Pollutants	Best Management Practices
Painting (Striping)		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Concrete Work (saw cutting and grinding operations)		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Parking Lot/Structure Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping" •
Materials Handling, Storage, and Disposal		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Loading and Unloading		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Refuse Dumpsters		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Vehicle and Equipment Washing (tool cleaning)		• See this activity's BMP in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operation Yards"
Vehicle and Equipment Fuel Dispensing Areas		• See this activity's BMP in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operation Yards"

6.14.3.1.3 Flood Control Devices Evaluations

The Municipal Permit requires that the City evaluate the existing flood control devices and determine if retrofitting is needed as storm drain projects are concept planned and designed. As the City moves forward with strategic planning for total maximum daily load requirements, the Storm Water Pollution Prevention Division will evaluate the potential for retrofitting flood control devices and make recommendations on BMPs to Engineering and Capital Projects Dept (ECP). ECP will be responsible for implementing the retrofits, where feasible.

6.14.3.2 Additional Controls for Municipal Area and Activities

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in Section 6.13.4.1 "Facilities Inspections and Improvements".

6.14.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.14.4.1 Facility Inspections and Improvements

The Municipal Permit requires that the City inspect all municipal facilities and storm drain system annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, tons of debris or trash removed, modify and improve BMPs where necessary and identify any potential pollutant discharges. Note: see Section 6.14.4.2, “Pollutant Discharge Notification” below for reporting requirements.

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.14-3, the first inspection will occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.14-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection or cleaning of the storm drain system, the Street Division determines that improvements to its BMPs are required, the Street Division will perform the action (e.g., repair a structural BMP), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved (Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection). If the Street Division determines that the modifications require additional time or funds to implement, the Street Division will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Facility Inspection Forms are attached as Appendix XIV "Inspection Forms" and are also located on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml.

6.14.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by Street Division and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When Street Division determines that a discharge poses a significant threat to water quality or human health, Street Division must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the Street Division to the Regional Board within five working days of the day the event was identified.

Street Division will also notify other regulatory agencies as required on Form 304.

6.14.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers

- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, "Education."

6.14.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a "Storm Water and You" training module presented at the "New Employee Orientation" workshop. Staff that do not take the "New Employee Orientation" workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive "refresher" training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via "e-tests" for randomly selected City employees with regular computer access will occur periodically between the mandated "refresher" courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.14.4.3.2 Activity-Specific Training

This section describes staff trainings provided by Street Division staff:

Municipal Departments

This section describes activity-specific trainings provided by the Street Division. The Street Division will create, execute and fund activity-specific training sessions that

incorporate the minimum storm water BMPs in Table 6.14-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.14-4. Activity-Specific BMP Training(s) Provided by the Street Division.

Training Module/Item	Staff Level	Schedule
Concrete finishing and curing	All Street Division Supervisors and Field Employees	Ongoing
Grinding and paving operations	All Street Division Supervisors and Field Employees	Ongoing
Vehicle and Equip cleaning and fueling	All Street Division Supervisors and Field Employees	Ongoing
Material Delivery and Storage	All Street Division Supervisors and Field Employees	Ongoing
Spill Prevention and Control	All Street Division Supervisors and Field Employees	Ongoing
Storm Drain Inlet Protection	All Street Division Supervisors and Field Employees	Ongoing
Gravel Bag Berm and Sandbag Barrier	All Street Division Supervisors and Field Employees	Ongoing
Street Sweeping and Vacuuming	All Street Division Supervisors and Field Employees	Ongoing
Silt Fence and Fiber Rolls	All Street Division Supervisors and Field Employees	Ongoing

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other

Training provided to Street Division staff consists of a general training to all employees and then focused training on specific activities. Most training incorporates and question and answer session for the facilitator to determine comprehension. Training logs are kept by each supervisor.

6.14.4.3.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Street Division in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.14-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.14-5. Department External Outreach Activities by Target Audience.

Department / Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
1. Door hangars with storm water educational message	3,4	Ongoing

6.14.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget

is developed and maintained by Street Division to track expenditures for designing, developing, and implementing BMPs and educational activities. The Street Division's annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

6.15 Vehicle Maintenance/Operations Yards

6.15.1 Background

This section is applicable to the General Services Department, Fleet Services Division ("Fleet Services") and all other departments and divisions which perform vehicle maintenance or operate at an operations yard. The goal of this section is to reduce the impact of department or division operations and maintenance activities on storm water quality and provide guidance for the protection of water quality and receiving waters. This section contains storm water best management practices (BMPs) that departments or divisions will implement for departments or division operations and maintenance activities in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 6.15-1.

Table 6.15-1. Municipal Permit requirements – Vehicle Maintenance/Operations Yards.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.15.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities and potential sources of pollutants.
6.15.3	(Pg. 32-34) D. 3. a. (2,3,4,5)	Implement and maintain BMPs.
6.15.4.1	(Pg. 35) D. 3. a. (7)	Inspect municipal areas, activities and implement any necessary follow up actions.
6.15.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.15.4.3	(Pg. 45) D. 5. (b, d);	Implement and designate an educational program for all City personnel.
6.15.4.4 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.15.2 Source Characterization

The City of San Diego operates and maintains a number of vehicle maintenance facilities, and operations yards. The primary operations yards are: Central Operations, Miramar Place, Chollas, and Rose Canyon Operations Yards. Additional vehicle repairs facilities are located at Fire Repair and Police garages (9 facilities). The complete inventory of vehicle maintenance facilities and operation yards are included in Appendix III, "Municipal Inventory." Department activities, their associated potential pollutants, and designated BMPs are listed in Table 6.15-2. The departments or divisions will

update any changes to the inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.15.4.4, "Annual Report Forms."

6.15.3 Best Management Practice Requirements

6.15.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.15.3.1.1 to 6.15.3.1.2 below are the BMPs required for departments or divisions that maintain vehicle maintenance facilities and/or operate out of operation yards.

If the departments or division determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Municipal Code, the department or division will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, the department or division will provide updates to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.15.4.4). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in "Illicit Discharge Detection and Elimination."

6.15.3.1.1 Minimum BMPs

Fleet Services and other applicable departments will ensure that all City staff implement the following minimum BMPs, as applicable.

1. Prior to starting activities, locate storm drain system and prevent pollutants from entering. Activity-specific BMPs are listed in Table 6.15-2.
2. Only clean rainwater can be discharged to the storm drain system. See Municipal Code Section 43.0305 "Exemptions from Discharge Prohibition" for allowable discharges.[1]
3. Sweep up municipal areas after activities and/or spills. Hosing down pollutants into the storm drain is prohibited by Municipal Code Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.
4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur between May 1 and September 30 each year.

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately the Fleet Services and other applicable departments responsibility to prevent pollutant discharges to the storm drain system. Therefore, the Fleet Services and other applicable departments will identify and implement any combination of the above minimum BMPs and/or any additional BMPs to avoid discharging pollutants into the storm drain system.

The Fleet Services and other applicable departments will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

6.15.3.1.2 Activity-Specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.15-2 will be implemented by City staff at Fleet Services and other applicable departments.

Table 6.15-2. BMPs Designated for Areas and Activities Related to Vehicle Maintenance and Operations Yards.

Activity	Potential Pollutants	Best Management Practices
Landscaping		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Loading and		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"

Activity	Potential Pollutants	Best Management Practices
Unloading		
Materials Handling, Storage, and Disposal		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Painting Activities	metals	• Do not perform paint preparation and equipment cleaning near storm drains. • Monitor weather and wind direction to ensure that paint is not entering storm water system or receiving waters. • Place canvas or plastic tarps under work to capture excess paint chips. • Dispose of paint leftovers according to the hazmat requirements.
Parking Lot/Structure Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping""
Refuse Dumpsters	sediments, metals, organic, compounds trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses,	• Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas. • Relocate dumpsters and bins away from storm drains systems. • Contaminated rain water that has accumulated from an open container must be discharged to the sanitary sewer with MWWD permission or infiltrated onto landscaping. • Ensure dumpsters are not leaking. If so, repair, cover, and/or exchange dumpsters. • Place absorbent socks or equivalent around bottom of scrap metal roll-off bins to capture pollutants and check integrity of absorbent socks or equivalent regularly.
Storm Drain System Inspection and Cleaning		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Vehicle and Equipment Fuel Dispensing Areas	sediments, metals, organic compounds, trash and debris, oil and grease	• Prior to starting activities, locate storm drain system and prevent pollutants from entering. • Use spill kits (dry clean up methods) for any spills.
Vehicle and Equipment Maintenance	sediments, metals, organic compounds, trash and debris, oil and grease	• Prior to starting activities, locate storm drain system and prevent pollutants from entering. • Use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste.[2] • Ensure wash water for specialized equipment and bleed line releases from air compressor units are disposed of properly.[2] • Use spill kits (dry clean up methods) for any spills.
Vehicle and Equipment	sediments, metals,	• Prior to starting activities, locate storm drain system and prevent pollutants from entering.

[2] Contact ESD-HMMP for assistance.

Activity	Potential Pollutants	Best Management Practices
Washing	organic compounds, trash and debris, oil and grease	• Wash vehicles in wash rack areas or car washes only. Maintain wash rack and car wash sanitary sewer drains regularly. • For automated vehicle washers, recycle wash water in a closed loop system where feasible. • Capture and properly dispose of all power washing water.[3]
Yard Clean Ups	sediments metals trash and debris, oil and grease	• Conduct annually between May 30 and September 30.

6.15.3.2 Additional Controls for Municipal Areas and Activities

The Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in section 6.15.4.1 “Facilities Inspections and Improvements.”

6.15.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.15.4.1 Facility Inspections and Improvements

The Municipal Permit requires that the City inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges Note: see Section 6.15.4.2, “Pollutant Discharge Notification” below for reporting requirements.

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will

[3] See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.

conduct a second facility inspection to its portion of the Operations Yard. As shown in Table 6.15-3, the first inspection will occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.15-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection the department or division determines that improvements to its BMPs are required, the department or division will perform the action (e.g., repair a structural BMP), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection. If the department or division determines that the modifications require additional time or funds to implement, the department or division will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Facility Inspection Forms are attached as Appendix XIV, “Inspection Forms” and are also located on the City’s website at http://www.sandiego.gov/thinkblue/resources/index.shtml.

6.15.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by Airports Division and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Municipal Code Section 43.0305 “Exemptions from Discharge Prohibition” to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a

fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When Airports Division determines that a discharge poses a significant threat to water quality or human health, Airports Division must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by Fleet Services or other applicable department to the Regional Board within five working days of the day the event was identified.

Department or divisions will also notify other regulatory agencies as required on Form 304.

6.15.4.3 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, "Education."

6.15.4.3.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.15.4.3.2 Activity-Specific Training

This section describes activity-specific trainings provided by Fleet Services or other applicable department. Fleet Services or other applicable department will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs inTable 6.15-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.15-4. Activity-specific BMP Training(s) Provided by the Department.

Training Module/Item	Staff Level (i.e., Supervisor, Crew, etc.)	Available
Parking Lot Cleanup BMPs	Supervisor, Crew	Ongoing
Material Management BMPs	Supervisor, Crew	Ongoing
Painting and Paint Disposal BMPs	Supervisor, Crew	Ongoing
Equipment Washing and Cleaning BMPs	Supervisor, Crew	Ongoing

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.15.4.4 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by departments to track expenditures for designing, developing, and implementing BMPs and educational activities. Fleet Services annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, “Annual Report Form Questions” for department-specific reporting requirements.

6.16 Water Systems

6.16.1 Background

This section is applicable to the Water Department which owns and operates the potable water supply and distribution systems for the citizens of the City of San Diego. The goal of this section is to reduce the impact of water operations and maintenance activities on storm water quality and provide guidance for the protection of water resources. This section contains storm water best management practices (BMPs) the Water Department will implement for water operations and maintenance activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements applicable to water systems operations.

The water systems for the City of San Diego include 3,000 miles of pipeline, 49 potable water pump stations, three treatment plants, 22 potable water reservoirs, five potable water clear wells, nine raw water reservoirs, and eight groundwater basins. Some of the City's water resources (raw water reservoirs and ground water basins) are located outside the City limits. Water Department systems serve 1.2 million City customers and provide water and water storage to other municipalities and water districts in San Diego County.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 6.16-1.

Table 6.16-1. Municipal Permit Requirements – Water Systems.

URMP Section	Municipal Permit Section	Requirement (Summary)
6.16.2	(Pg. 32) D. 3. a. (1)	Inventory municipal areas, activities and potential sources of pollutants.
6.16.3	(Pg. 32-34) D. 3. a. (2,3,4,5)	Implement and maintain BMPs.
6.16.4.1	(Pg. 35) D. 3. a. (7)	Inspect municipal areas, activities and implement any necessary follow up actions.
6.16.4.2	(Pg B-6) Attachment B. 5. (e)	Report pollutant discharges to the storm drain system or receiving waters.
6.16.4.4	(Pg. 45) D. 5. (b, d);	Implement and designate an educational program for all City personnel, contractors, and community groups.
6.16.4.5 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

6.16.2 Source Characterization

The Water Department's inventory includes water treatment plants, pump stations, potable water reservoirs, buildings, and operations yards as well as a laboratory and a

training facility (see Appendix III, ”Municipal Inventory”). Water Department activities, their associated potential pollutants, and designated BMPs are listed in Table 6.16-2. The Water Department will update any changes to the water systems facilities inventory, activities, and/or BMPs on an annual basis as part of the reporting process described in Section 6.16.4.5, “Annual Report Forms.”

6.16.3 Best Management Practice Requirements

6.16.3.1 Updated BMP Requirements

The BMPs identified in Sections 6.16.3.1.1 to 6.16.3.1.2 below are the Water Department’s minimum and activity-specific BMPs for water systems operations and maintenance activities. The activity-specific BMPs are also referenced in the Water Department's Standard Operations Policy and Procedures (SOPPs) (see Appendix XVI).

If the Water Department determines that a municipal activity or procedure does or could result in a significant pollutant discharge in violation of Section 43.03 of the San Diego Municipal Code, the Water Department will modify its activities to reduce the potential for future significant pollutant discharges. Whenever the BMPs are improved or revised, the Water Department will provide updates to its SOPPs, to the Storm Water Pollution Prevention Division with the annual report form (see Section 6.16.4.5). It is important to note that collectively, these BMPs represent the Maximum Extent Practicable (MEP) Standard required by the Municipal Permit. Therefore, if any BMPs are eliminated or modified, the replacement set of BMPs must collectively provide equal or greater storm water quality protection. For information on enforcement see Section 9.5 in “Illicit Discharge Detection and Elimination.”

6.16.3.1.1 Minimum BMPs—Water Systems

The Water Department will ensure that all City staff implement the following minimum guidelines, as applicable.

1. Prior to starting activities, <u>locate storm drain system and prevent pollutants from entering.</u> Activity-specific BMPs are listed in Table 6.16-2.
2. <u>Only clean rainwater can be discharged to the storm drain system</u>. See Municipal Code Section 43.0305 “Exemptions from Discharge Prohibition” for allowable discharges.[1]
3. <u>Sweep up municipal areas after activities and/or spills</u>. Hosing down pollutants into the storm drain is prohibited by Municipal Code Section 43.03. Use a broom, shovel, or other mechanical means to collect solids for reuse or disposal. Use absorbents to reduce the spread of liquids and absorb or pump up liquids for reuse or disposal. Dispose of hazardous waste as required by law or contact the Environmental

[1] http://clerkdoc.sannet.gov/RightSite/getcontent/local.pdf?DMW_OBJECTID=09001451800870fc

Services Department, Hazardous Materials Management Program (ESD-HMMP) for assistance.

4. Annually inspect and clear all storm drain system catch basins, open channels, and drop inlets of debris or other foreign material at locations listed in the Division's municipal facility inventory (see Appendix III). Storm drain system inspections and any necessary cleanings must occur between May 1 and September 30 each year.
5. Keep lids closed on trash cans and dumpsters to prevent rainwater from entering, as applicable, and ensure that trash is picked up around the cans and dumpsters at all times. Provide enough trash cans/dumpsters in all appropriate areas.
6. Keep materials and waste piles covered and, if possible, off the ground. Materials and waste stockpiles must be protected to prevent contact with rainwater and any runoff. Check materials and stockpiles on a regular basis to verify the BMPs (such as roof covering, tarps, silt fences, palettes, etc.) are in good condition.
7. Routinely inspect vehicles for leaks, and service immediately if necessary. If vehicle is leaking, until vehicle is repaired use drip pans for all vehicle leaks and/or clean up with dry methods and dispose of as a regulated waste. Contact ESD-HMMP for assistance.
8. Capture and properly dispose of all power washing water. See fact sheet at http://www.sandiego.gov/thinkblue/pdf/mobilebusinessbrochure.pdf for proper power washing methods and disposal requirements.
9. Stencil storm drains in the Division's municipal inventory (Appendix III) with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/Think Blue", as appropriate. Check stencil legibility, and if necessary, re-stencil before September 30 of each year. Stencils and asphalt paint (blue on sidewalks/white on asphalt) are available from the Storm Water Pollution Prevention Division.
10. Reduce over-irrigation as a means of minimizing the volume of potentially contaminated water entering the storm drain system.

It is ultimately the Water Department's responsibility to prevent pollutant discharges to the storm drain system. Therefore, the Water Department will identify and implement any additional BMPs that may be required to avoid the discharge of pollutants to the storm water system.

The Water Department will coordinate with the Purchasing and Contracting Department to ensure that as contracts are initiated or renewed, the most current minimum BMP requirements are written into the contract (see Appendix IX, "Municipal Operations and Maintenance Contract Language" for current language as of January 25, 2008).

6.16.3.1.2 Activity-Specific BMPs

In addition to the minimum BMPs listed above, the following BMPs listed in Table 6.16-2 will be implemented by City employees during the Water Department's routine and emergency water systems operations and maintenance activities.

Table 6.16-2. BMPs Designated for Areas and Activities at Water Systems Facilities.

Activity	Potential Pollutants	Best Management Practices
Operation and Maintenance of Distribution Lines, Pressure Regulating Stations, Potable Water Reservoirs and Facilities	sediments, oil and grease	• SOPP C.01 to C.06, C.09, C.11 to C.17,C.22 to C.24 Construction* • SOPP D.01 to D.03, D.08, D.24 Systems Operations*
Operation and Maintenance of Transmission Lines From The Lakes to Treatment Plants	sediments, oil and grease	• SOPP E.01 to E.02 Facilities Maintenance*
Water Main Repair (emergency and planned)	sediments	• SOPP C.04, C.12, C.13 Construction*
Water Resource Management (surface and groundwater)	sediments	• SOPP E.03 Resource protection during access activity* • E.08 Land use permits*
Reservoir Maintenance • Paved surfaces • Picnic areas • Boat cleaning, boat docks • Boat fueling • Sewage containment and collection • Pressure washing of equipment and vehicles, of building facades and pavement • Irrigation Repair	bacteria, viruses, organics, nutrients, herbicides, fertilizers	• SOPP F.04 • SOPP F.05 • SOPP F.06 • SOPP F.08 • SOPP F.09 • SOPP F.10, SOPP F.11 • SOPP F.12 • SOPP F.13 • SOPP F.14, SOPP F.15* • See Table 6.3-2, Section 6.3, “Buildings/Parking Facilities/Landscaping”
Hydrant Flushing	sediments	• SOPP D.01, D.02*
Main Flushing	sediments	• SOPP C.03*
Highline and Water Wagons (temporary water services during construction and water main breaks)	sediments	• SOPP C.04, C.17*
Water Transfers between Reservoirs (Dam galleries and outlet towers of raw water reservoirs)	sediments	• SOPP F.02*
Diversion Channels to Protect Raw Water Reservoirs	sediment	• SOPP F.01*
Cleaning and Maintaining Building Exteriors and Roofs at Reservoirs	bacteria and viruses, organic compounds, oils and grease, nutrients, trash, debris	• SOPP F.02* • SOPP F.03* • SOPP F.14* • SOPP F15*
Comfort Stations at Reservoirs	bacteria, viruses	• SOPP F.07*

Activity	Potential Pollutants	Best Management Practices
Operations and Maintenance at Water Treatment Plants for Chemical Spill Procedures	organic and inorganic compounds	• SOPP G.01 for treatment plants' operations*
Operations and Maintenance at Water Treatment Plants for Process Safety Management Reports	organic and inorganic compounds	• SOPP G.02 for mandated process safety and hazard management (PSM/H) plans and spill prevention control and countermeasures (SPCC) plans • Offsite consequence analyses for Risk Management Program
Operations and Maintenance at Water Treatment Plants	organic and inorganic compounds bacteria, viruses, metals, oils grease	• SOPP G.04 for operations and maintenance* • Water Treatment Plants SWPPPs*
Operations and Maintenance at Water Quality Laboratory	bacteria, viruses, organic and inorganic compounds	• SOPP H.01*
Storm Water Agencies Reporting Procedures for Emergency/Unplanned Discharges/Main Breaks	sediment	• SOPP I.01 Stock piles must have flow line*
Storm Water Management and Control	sediment	• SOPP I.02*
Vehicle and Equipment Washing	sediments, metals, organic, compounds, trash and debris, oil and grease	• Prior to starting activities, locate storm drain system and prevent pollutants from entering. • Only clean vehicles in wash rack areas or car washes.
Materials Handling, Storage, and Disposal	nutrients, metals, organics, oxygen demanding substances, oils and grease, pesticides	• SOPP C.01 Bulk handling of oils and fuels* • See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Material Loading and Unloading	nutrients, metals, organics, oxygen demanding substances, oils and grease, pesticides	• SOPP C.01 Bulk handling of oils and fuels* • See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Sump Pump Maintenance for comfort stations	organics	• SOPP F.07*

Activity	Potential Pollutants	Best Management Practices
Concrete, Asphalt Work, and Cold Asphalt Mix Piles (non-emergency)	sediments, oils and grease	• SOPP C. 06 Salvage yard operations* • E.03 Policy for resource protection for access activity* • E.03 - 2.20 per URMPs* • E.03 - 2.21 BMPs per CA Storm Water Quality Assoc. BMP Handbook current edition*, • E.03 - 4.1 Unlawful to dump in waterways*
Parking Lot/Structure Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Storm Drain System Inspection and Cleaning at Water Department Facilities		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
HVAC, Chillers and Refrigerators Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Boiler Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Cooling Tower Maintenance		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Fire Sprinkler Flushing		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Landscaping		• See this activity's BMP in Table 6.3-2, Section 6.3, "Buildings/Parking/Landscaping"
Water Systems Design (CIP Program)		• See this activity's BMP in Table 4-2 in Section 4.0, "Development Planning"
Water Systems Construction (CIP Program)		• See this activity's BMP in Table 5-2 in Section 5.0, "Construction"
Refuse Dumpsters		• See this activity's BMP in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yards"
Vehicle and Equipment Fuel Dispensing Areas		• See this activity's BMP in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yards"
Vehicle Equipment Maintenance		• See this activity's BMP in Table 6.15-2, Section 6.15, "Vehicle Maintenance/Operations Yards"
Special Event Permitting	all	• Regulations that protect drinking water sources are enforced during special events, thereby protecting storm water quality. • Storm drain inlets in the parking lots drain to the reservoir through filter systems which are cleaned at least annually by City staff. • Special event permits contain clean up requirements, and extra dumpsters and port-a-lets may be required depending on the size of the event. • City staff perform inspections of event area after each event.

Activity	Potential Pollutants	Best Management Practices
		• City staff clean up after events if necessary (deposit is held from event holder for this purpose).

* See Appendix XVI, "Water Department SWPPP/ SOPPs"

6.16.3.2 Additional Controls for Municipal Areas and Activities

The Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection as described in detail in section 6.16.4.1, "Facilities Inspections and Improvements."

6.16.4 Program Implementation

The previous sections described the minimum and activity-specific BMPs that must be implemented. This section describes the administrative steps that departments will undertake to prepare for and verify the implementation of those BMPs including facility inspections, discharge notifications, education and training, and annual reporting. In addition, departments will maintain a storm water representative responsible for overseeing the departments implementation efforts. The Storm Water Pollution Prevention Division will meet periodically with each department's storm water representative to assist with the implementation efforts.

6.16.4.1 Facility Inspections and Improvements

The Municipal Permit requires that the City inspect all municipal facilities annually. The purpose of the facility inspections is to evaluate the adequacy of existing BMPs, modify and improve BMPs where necessary and identify any potential pollutant discharges Note: see Section 6.16.4.2, "Pollutant Discharge Notification" below for reporting requirements.

In addition, the Municipal Permit requires that the City implement additional BMPs at municipal facilities that discharge to, or are tributary to, a 303(d) listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). To meet this additional BMP requirement, each City facility will conduct a second facility inspection. As shown in Table 6.16-3, the first inspection will occur before the beginning of the rainy season (during September) and the second inspection will occur during the rainy season (preferably during January, but prior to the end of April).

Table 6.16-3. Municipal Facility Inspection Requirements.

Inspection	Timeframe

Inspection	Timeframe
First	September
Second	January - April

If as a result of the inspection the Water Department determines that improvements to its BMPs are required, the Water Department will perform the action (e.g., repair a structural BMP and/or update the SOPPs), and subsequently conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved (Note: if repairs, modifications or improvements to the BMPs are necessary, those follow-up actions and re-inspections will not count as the second inspection). If the Water Department determines that the modifications require additional time or funds to implement, the Water Department will develop an anticipated schedule for when the modification will be completed. Record of any changes/improvements instituted as part of the municipal facility inspection process will be included in the annual report forms provided to the Storm Water Pollution Prevention Division each year.

The Municipal Permit also requires inspections of special events. The Water Department will conduct periodic inspections (no less than once annually) of each category, or type, of special event, to ensure that the Reservoirs and Recreation Program Special Event Permit Requirements identified in Table 6.16-2, above are effectively being implemented. Water Department staff will note any deficiencies during the inspection and coordinate with the Event Hosts/Organizers to resolve the issue. If potential discharges to the storm drain system are identified during the inspection, Water Department staff will report the potential discharge to the City's Storm Water Hotline, (619) 235-1000. These inspections will be included in the annual reporting information provided to the Storm Water Pollution Prevention Division each year (see Section 6.13.4.5, below).

A Municipal Facility Inspection Form and a Special Event Inspection Form are attached as Appendix XIV "Inspection Forms" and are also located on the City's website at http://www.sandiego.gov/thinkblue/resources/index.shtml, if the department chooses to use them.

6.16.4.2 Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the San Diego Regional Water Quality Control Board (Regional Board). A significant threat to water quality or human health is determined on a case-by-case basis by the Water Department and depends on the type of pollutant, the degree of the violation (i.e., the amount of pollutant discharged into the municipal storm drain system), the proximity to receiving water bodies, the potential for exposure to the public, and the potential for environmental damage. Generally, for a discharge to be considered a significant threat to water quality or human health, the discharge must contain a non-storm water substance and enter the storm drain system. See Municipal

Code Section 43.0305 “Exemptions from Discharge Prohibition” to review the list of allowable non-storm water discharges (Appendix II). Please be aware that the 24-Hour reporting process is designed to address significant discharges as a result of significant accidents, not day-to-day operations or activities, or even minor accidents. A small water line break, for example, that occurs in a natural area but causes little or no environmental damage, would generally not be considered a significant event that would require reporting through the 24-Hour reporting process. In another example, a fuel spill that is contained and removed from a paved parking lot, without any of the substance entering the storm drain system or receiving waters, would not be considered a significant reportable discharge.

When the Water Department determines that a discharge poses a significant threat to water quality or human health, The Water Department must notify the Regional Board by facsimile within 24 hours of the discharge event using the Chemical Release Reporting Form 304 available in Appendix XV and also on the City’s website at http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City’s Storm Water Pollution Prevention Division for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the Water Department to the Regional Board within five working days of the day the event was identified.

The Water Department will also notify other regulatory agencies as required on Form 304.

6.16.4.3 Groundwater

The Water Department desires to protect its interests in groundwater resources for the development of water supply and storage. In some cases, the City’s interests extend beyond City of San Diego limits. The Water Department intends to be active in the review of storm water BMP selection and standards (with particular attention to infiltration BMPs because of their potential to degrade groundwater resources). The Water Department will work with the City and other jurisdictions as pollution sources and groundwater basin supply and storage priorities are identified. Although not a part of the City’s Urban Runoff Management Program, the Water Department plans to develop and implement one or more Groundwater Management Plan(s) for groundwater basins during the course of Storm Water Permit implementation. The Plan or Plans may establish site specific monitoring programs, where appropriate, to assess impacts of Storm Water Permit implementation on the basin water quality. In particular, monitoring programs could be utilized to evaluate the use of a combination of BMPs where storm water is discharged and percolated into groundwater basin supply and storage areas. For example, combination BMPs could include natural vegetative type processes, catch basins with filters, avoidance of use of high toxic chemicals, use of slow release fertilizers to reduce nitrate load in runoff, and use of pesticides with low water solubility. The City's groundwater basins that are utilized for supply and storage may be monitored on an ongoing basis to determine the water quality condition. The source of pollution would be traced, if possible, to identify the responsible party.

Information would be provided to the Storm Water Pollution Prevention Division or City Attorney for enforcement. More information about enforcement methods is included in Section 9.5, ”Illicit Discharge Detection and Elimination.” Groundwater activities will be included in the annual report submitted by the Water Department to the Storm Water Pollution Prevention Division.

6.16.4.4 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, “Education.”

6.16.4.4.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide

training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

6.16.4.4.2 Activity-Specific Training

Municipal Departments

This section describes activity-specific trainings provided by the Water Department. The Water Department will create, execute and fund activity-specific training sessions that incorporate the minimum storm water BMPs inTable 6.16-4. The Storm Water Pollution Prevention Division can assist departments with the development of training materials at their request.

Table 6.16-4. Activity-specific BMP Training(s) Provided by the Water Department.

Training Module/Item	Staff Level	Schedule
Storm Water P/P General	All WD Employees	Ongoing
Storm Water P/P Dams/Reservoirs	All WD Lakes Employees	Ongoing
Storm Water P/P Customer Services	All WD CSR’s	Ongoing
Storm Water P/P Field Ops	All WD Field Employees	Ongoing
Storm Water P/P Supervisor	All WD Field Supervisors	Ongoing
Storm Water BMP Policy Refresher	All WD Field Supervisors and Employees	Ongoing

Note: the completion dates listed are estimated. Actual completion dates may vary depending upon other program factors.

6.16.4.4.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Water Department in consultation with the Storm Water Pollution Prevention Division (e.g., including the Think Blue logo on materials). Table 6.16-5 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 6.16-5. Department External Outreach Activities by Target Audience.

Department / Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
Water Operations		
1. Watershed Sign Program a. Billboards b. Radio PSAs c. Print Advertising d. Movie Theater Ads e. Web page f. Other (TBD)	4	Ongoing

Department / Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
2. Annual Drinking Water Quality Report	1, 2, 3, 4, 5	Ongoing
3. City Hall elevator posters	3, 4	Ongoing
4. Letter to Miramar Lake Residents	4, 5	Ongoing
5. Lakes Brochures and Insert	4	Ongoing
6. Customer Survey for Street Division Services	3, 4	Ongoing
7. Customer Survey for Water Operations Services	3, 4	Ongoing
8. City of San Diego Weekly Web Feature	3, 4	Ongoing
9. San Diego River, Otay River, San Dieguito River Watershed Management Plans	2, 3, 4	Ongoing
10. Annual Article on Lake Murray for *Mission Times Courier*	4	Ongoing
Customer Support		
1. Water Bill Inserts	2, 3, 4, 5	Ongoing
2. Web Site	1, 2, 3, 4, 5	Ongoing
Water Conservation		
1. Fleet Science Center Presentation	4	Ongoing
2. Water Conservation Calendar	3, 4	Ongoing
3. Article on California Native Plants for local media	3	Ongoing
Capital Improvement Program		
1. Alvarado Water Treatment Plant *Water Lines* Newsletter	3, 4	Ongoing

6.16.4.5 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by The Water Department to track expenditures for designing, developing, and implementing BMPs and educational activities. The Water Department's annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements.

7.0 Industrial and Commercial Section

7.1 Introduction

Principally, the General Services Storm Water Pollution Prevention Division staff carries out the industrial/commercial section of the Jurisdictional Urban Runoff Management Plan (URMP). Other departments such as Metropolitan Wastewater Department (MWWD) also conduct storm water inspections during restaurant inspections to assist the Storm Water Pollution Prevention Division's efforts. In addition to conducting industrial/commercial inspections, there is also code enforcement staff within the Storm Water Pollution Prevention Division to enforce the City's storm water ordinance. Each staff member is responsible for patrolling a portion of the City, visually inspecting for storm water violations, and conducting follow-up investigations of businesses when issues are identified during routine industrial/commercial inspections. In addition, they respond to complaints received from the storm water hotline (619-525-1000) or referrals from other departments within the City and County.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 7-1.

Table 7-1. Municipal Permit requirements – Industrial/commercial Uses.

URMP Section	Municipal Permit Section	Requirement (Summary)
7.2	(Pg. 35) D.3.b.	Implement an Industrial/commercial program
7.3.4.1	(Pg. 44) D.5.B(1)(c,d)	Education, training, and outreach
7.3.4.2 and Appendix XIII "Annual Report Form Questions"	(Pg. 68) J. 3. (c,d,g,j); (Pg. 51) G.3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

7.2 Stationary Sources Element

7.2.1 Background

Each facility within the City's jurisdiction has been inventoried and categorized as either commercial or industrial. Based on the prioritized category, certain best management practices (BMPs) are required, and inspection frequencies implemented. The industrial/commercial facilities that violate the Municipal Permit are notified, reported, and enforced against as described in subsequent sections.

7.2.2 Source Characterization

7.2.2.1 Source Identification

A watershed-based inventory of known industrial/commercial facilities within the City's jurisdiction has been developed and will be updated annually (see Appendix V, "Industrial/commercial Inventory"). The current inventory is almost 20,000. There are around 250 industries in the City that are permitted under the State of California's General Industrial Permit. This inventory is based on multiple sources of information including the City's business tax license list, the State's general industrial storm water database, the City's Food Elimination Waste Discharge (FEWD) and Industrial Waste Control Program (IWCP) databases, and any other sources of information, as appropriate.

The purpose of this inventory is to assist in identifying industrial/commercial activities and pollutants, prioritize industrial/commercial sites according to their potential impacts to the storm drain system, providing a compliance history for each site, and allocating resources for future inspection, enforcement, and outreach efforts. The inventory will include site/source name; address; pollutants potentially generated, identification of whether the site/source is tributary to a Clean Water Act section 303(d) water body, and a narrative description including Standard Industrial Classification codes which best reflects the principal products or services provided by each facility.

7.2.2.2 Prioritization Based on Threat to Water Quality

The facility prioritization will be used to assist in establishment of inspection requirements. Prioritization involves classifying a facility as being a high, medium, or low priority threat based on the facility's location with respect to sensitive water bodies, the facility's activities' potential risk of discharging pollutants into the storm drain system, past Municipal Permit compliance, concurrent coverage under the State's General Industrial Permit, field observations during site inspections, and any other additional information that may be relevant.

7.2.3 Best Management Practice Requirements

7.2.3.1 Updated BMP Requirements

The City has identified minimum BMPs that will be required at all industrial/commercial facilities based on the type of activity that is being conducted (see Appendix X, "Industrial/commercial BMPs"). Industrial/commercial facilities will be notified over the next three years of the City's requirements through distributed materials and during site visits and inspections.

7.2.3.2 Additional Controls for Stationary Commercial Sites/Sources

Environmentally sensitive receiving waters within the City of San Diego are of special concern in terms of sensitivity to discharges from industrial/commercial facilities. The City identified BMPs to be used at facilities that have the potential to discharge directly to Clean Water Act section 303(d) impaired water bodies, coastal lagoons, or water

bodies on environmentally sensitive lands (see Appendix X, “Industrial/Commercial BMPs”).

7.2.4 Program Implementation

7.2.4.1 Inspections of Industrial/commercial Facilities

The goal of the inspections is to ensure that pollutants from runoff have been reduced to the maximum extent practicable or to technology-based standards, if applicable. Inspectors who meet the San Diego Regional Water Quality Control Board (Regional Board) standards for industrial inspectors physically visit the facilities checking for evidence of non-storm water discharges, verifying BMP implementation, and assessing BMP effectiveness. The facility operator is required to determine the effectiveness of the BMP in controlling pollutants during his/her self-inspection/quality assurance program, and during the inspection or review by the Storm Water Pollution Prevention Division. Storm Water Pollution Prevention Division inspectors may also provide educational materials and technical or regulatory updates, refer the facility to BMP reference materials, review storm water pollution prevention plans (SWPPPs), provide feedback about BMPs appropriate for a given activity, and identify any illicit discharges and connections to the municipal storm drain system. The inspections also provide an opportunity to verify and/or collect additional information for updating the prioritized watershed-based inventory.

The City’s Storm Water Pollution Prevention Division will use the inventory database to obtain baseline facility information. An inspection sheet, provided in Appendix XIV, “Inspection Forms,” is used to help guide the inspection and ensure that adequate data is collected at each facility. The inspection form includes questions about BMP implementation and assessment, review of monitoring data (if available), training documentation, visual observations, compliance with municipal ordinances, and coverage under the General Industrial Permit (when applicable). Photographs are also taken as needed to document findings.

The Storm Water Pollution Prevention Division staff coordinates with the City’s MWWD and the Regional Board in order to avoid repeat inspections. Storm Water Pollution Prevention Division staff reviews these inspections sheets for possible non-compliant or high risk activities. When these activities are identified Storm Water Pollution Prevention Division staff will perform follow-up inspections or other actions in order to alleviate the threat to water quality. All industrial facilities subject the State’s General Industrial Permit that do not have coverage under that program (non-filers) will be reported to the Regional Board in the annual reporting process (see Section 7.3.4.2).

7.2.4.2 Inspection Frequencies

The City will inspect, at a minimum, 25% of it’s industrial/commercial inventory each year. The City will inspect 100% of the industrial/commercial facilities that pose a high threat to water quality each year. In any year that the number of high threat facilities is

greater than 25% of the inventory, all high threat facilities will be inspected. The inventory database will be used to track the frequency of inspections (see Section 7.2.2.1).

7.2.4.3 Monitoring of Industrial Facilities

The City requires that high priority industrial facilities implement monitoring programs for runoff from their facilities. The details of this program are provided in Section 9.0, "Illicit Discharge Detection and Elimination."

7.2.4.4 Documentation

The Storm Water Pollution Prevention Division has developed an inspection form/checklist to be used by all departments conducting inspections within the City to ensure consistency. Inspection records will be maintained by the Storm Water Pollution Prevention Division for all inspections conducted by City staff. Establishing good record keeping procedures during the inspection, follow-up, and enforcement process is critical. When follow-up action is necessary, individual files will be prepared containing results of all inspections, photographs, and communications related to the facility. The tasks that will be performed for this element are as follows:

- Update inspection forms as needed for easy recording and inputting into database/inventory
- Update and maintain database/inventory

7.2.4.5 Pollutant Discharge Notification

Non-compliant sites that are deemed to pose a significant threat to water quality or human health will be reported by Storm Water Pollution Prevention staff to the Regional Board within 24 hours of discovery of the incident. A significant threat to water quality or human health is determined by the City on a case-by-case basis and will be dependent on the type of pollutant, the degree of the violation (i.e. the amount of pollutant discharged into the municipal storm drain system), the proximity to sensitive habitat or water bodies, the potential for exposure to the public, and the potential for environmental damage. City staff will use the Chemical Release Reporting Form 304 available in Appendix XV and also on the City's website at: http://www.sandiego.gov/thinkblue/resources/index.shtml. A copy of the form must also be forwarded to the City's Storm Water Pollution Prevention Division (URMP Program) for record keeping purposes. Additionally, a more detailed written report of the event and follow up actions must be sent by the Storm Water Pollution Prevention to the Regional Board within five working days of the day the event was identified.

The Division will also notify other regulatory agencies as required on Form 304.

7.2.4.6 Enforcement of Regulations at Industrial/commercial Facilities

Inspections or complaint investigations of industrial/commercial facilities may result in situations requiring enforcement action. Enforcement of storm water regulations are conducted by City staff members with enforcement authority and, when necessary, by legal counsel. The inspectors, in accordance with the existing procedures for recording violations, will properly document each observed violation.

Based on the site inspection, when a violation of federal, state or local regulations has been observed, follow up activities include communication with the facility in the form of phone calls or letters. The purpose of this communication is to provide additional education and verification that corrective actions have been taken. When facilities are not adequately addressing compliance issues, the facility will be turned over to the enforcement section of the Storm Water Pollution Prevention Division. Depending on the severity of the violation, enforcement can range from a Notice of Violation to large fines. A more detailed discussion of the enforcement program can be located in section 9.5, “Illicit Discharge Detection and Elimination.”

7.2.4.7 Education and Training

Education and training for municipal staff that implement the Industrial and Commercial Facilities Program along with public outreach to target audiences is that same as that for the Mobile Businesses Program (see section 7.3.4.1). Training for industrial and commercial inspectors will occur annually.

7.2.4.8 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by departments to track expenditures for designing, developing, and implementing BMPs and educational activities. The Storm Water Pollution Prevention Division’s stationary industrial and commercial sources annual report information will be compiled for annual reporting purposes on or before July 21 each year. See Appendix XIII, “Annual Report Form Questions” for department-specific reporting requirements.

7.3 Mobile Sources Element

7.3.1 Background

Mobile businesses have been identified as a significant potential source of non-storm water discharges. The very nature of mobile businesses makes the task of achieving compliance with storm water regulations difficult. The City of San Diego has developed a program to identify mobile businesses that operate within the City, include these businesses in the industrial/commercial inventory, notify them of BMP requirements, inspect them on an as needed basis, and take enforcement actions when necessary.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," see Appendix I), as described in Table 7-2.

Table 7-2. Municipal Permit requirements – Mobile Businesses.

URMP Section	Municipal Permit Section	Requirement (Summary)
7.3	(Pg. 39) D.3.b.(4)	Implement a Mobile Businesses program
7.3.4.1	(Pg. 44) D.5.B(1)(c,d)	Education, training, and outreach
7.3.4.2 and Appendix XIII "Annual Report Form Questions"	(Pg. 68) J. 3. (c,d,g,j); (Pg. 51) G.3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

7.3.2 Source Characterization

An inventory of mobile businesses known to operate within the City's jurisdiction has been developed and will be updated annually. The purpose of this inventory is to assist in identifying different mobile businesses, identifying potential pollutants these businesses may discharge, providing a compliance history for each business, and allocating resources for inspections, enforcement, and outreach efforts.

7.3.3 Best Management Practice Requirements

7.3.3.1 Updated BMP Requirements

The City has identified minimum BMPs that will be required for all mobile businesses based on the type of activity that is being conducted (see Appendix X, "Mobile Sources BMPs"). Mobile businesses will be notified by January 25, 2009 of the City's BMP requirements through distributed materials and during inspections.

7.3.3.2 Additional Controls for Environmentally Sensitive Areas

Environmentally sensitive receiving waters within the City of San Diego are of special concern in terms of sensitivity to discharges from industrial/commercial facilities. The City identified BMPs to be used at facilities that have the potential to discharge directly to Clean Water Act section 303(d) impaired water bodies, coastal lagoons, or water bodies on environmentally sensitive lands (see Appendix XI, "Industrial/Commercial BMPs").

7.3.4 Program Implementation

The goal of mobile business inspections is to ensure that pollutants from runoff have been reduced to the maximum extent practicable or to technology-based standards, if applicable. This is accomplished by checking for evidence of non-storm water discharges, verifying BMP implementation and assessing BMP effectiveness. Inspectors may also provide educational materials and technical or regulatory updates, refer the business to BMP reference resources, review SWPPPs and provide feedback about BMPs appropriate for a given activity, and identify any illicit discharges and connections to the municipal storm drain system. The inspections also provide an opportunity to verify and/or collect additional information for updating the prioritized watershed-based inventory.

Mobile businesses will be inspected as needed by Storm Water Pollution Prevention Division's Industrial/Commercial Program staff in order to ensure that mobile businesses are implementing minimum BMPs and are not discharging pollutants to the storm drain system. The Storm Water Pollution Prevention Division's Code Enforcement Section will enforce mobile businesses in violation of the San Diego Stormwater Management and Discharge Control Ordinance ("Stormwater Ordinance",see Section 7.2.4.6).

7.3.4.1 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, “Education.”

7.3.4.1.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

7.3.4.1.2 Public Outreach

Public outreach efforts are implemented by the Storm Water Pollution Prevention Division’s Education and Outreach Program. Their activities related to industrial/ commercial and mobile business outreach are documented in Section 10.0, “Education”, and Section 11.0, “Public Participation.” Outreach will include flyers addressing minimum BMP requirements and other storm water related requirements.

7.3.4.2 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by departments to track expenditures for designing, developing, and implementing BMPs and educational activities. The Storm Water Pollution Prevention Division’s Mobile Business Program annual report information will be will be compiled for annual reporting purposes on or before July 21 each year. See

Appendix XIII, “Annual Report Form Questions” for department-specific reporting requirements.

8.0 Residential Section

8.1 Introduction

The Municipal Storm Water Permit (Order No.R9-2007-0001 "Municipal Permit" see Appendix I) mandates that all Copermittees implement a Regional Urban Runoff Management Program (RURMP), including a residential component, in an effort to further reduce the discharge of pollutants and prevent urban runoff discharges. The City's program must meet the requirements of the Municipal Permit, as described in Table 10.2-1.

Table 8-1. Permit Requirements – Residential.

URMP Section	Municipal Permit Section	Requirement (Summary)
8.4	(Pg 50) F.1; (Pg.44) D.5	Provide pollutant specific education with focuses on bacteria, nutrients, sediment, pesticides and trash
8.5	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

The City of San Diego's "Think Blue" campaign has been the most visible storm water awareness program in the region. With this in mind, the Copermittees recently decided to use the ""Think Blue"" brand and messages as an effective tool to educate the public about storm water issues on a regional level. During the this permit cycle, the program will be active on three levels:

- Regional – a joint residential education campaign where dollars from all of the Copermittees will be leveraged for broad based media buys and activities that will benefit all Copermittees on the macro level.
- Watershed – the City and each Copermittee will be responsible for implementing a minimum of two educational or outreach activities in each watershed for which they are a designated responsible party.
- Jurisdictional – the City and each Copermittee will be responsible to conduct more localized outreach and have the discretion to use as much or as little of the regional "Think Blue" messaging that they deem necessary to augment their individual jurisdictional campaigns.

8.2 Source Characterization

The Municipal Permit requires that the City identify high threat to water quality residential areas and activities. In the past, the City designated that all residences within City limits were identified as high threat to water quality. See Appendix VII, "High Priority Residential Areas Inventory."

8.3 Best Management Practice Requirements

8.3.1 Updated BMP Requirements

The Municipal Permit requires that the City designate minimum BMPs for high threat to water quality residential areas and activities and that these BMPs be area or activity specific. See Appendix XII, "Residential BMPs."

8.3.2 Additional Controls for Residential Areas and Activities Discharging or Tributary to ESAs

The Municipal Permit requires that the City implement additional controls at residences that discharge to, or are tributary to, a 303d listed water body, lagoon, or water body on environmentally sensitive lands (all City facilities are subject to this requirement). See Appendix XII, "Residential BMPs."

8.4 Program Implementation

The City of San Diego and its Copermitees have created the regional "Think Blue" outreach program. The County of San Diego published a "Regional Watershed Education Document" available as Appendix XX.

Residential Target Audiences

With the new mandates addressed in the Municipal Permit for Copermittees to address bacteria, nutrients, sediment, pesticides, and trash, the City has changed the focus of its residential education strategy to target the greatest sources for these pollutants of concern in specific areas. The City and Copermittees have these pollutants in common, therefore, a shared mass media campaign would be most effective and beneficial for all Copermittees in reaching the residents across the region. "Think Blue" can provide a broader, universal message and normative behavior reinforcement than individual cities can provide on their own.

Outreach Strategies and Tactics

Just as audiences vary in interests and behaviors, the types of communications tools and message vehicles that will successfully reach those audiences must be similarly varied. Section 10, "Education", provides details on the myriad of tools available including information regarding Community Based Social Marketing (CBSM) strategies.

The Copermittees will provide "Think Blue" with funding to develop, place and track overarching education, outreach and advertising tools on behalf of the region. The Copermittees will provide "Think Blue" with clearly identified priorities, target audiences and target pollutants to be addressed in each fiscal year. These elements will be developed with input from a designated subcommittee that will provide timely review for

"Think Blue" to meet identified goals and objectives for the region as identified at the beginning of each fiscal year.

Additional residential outreach strategies will be the responsibility of the Copermittees on a local level and set forth in their individual JURMP documents. The City of San Diego's localized residential outreach strategies are detailed in Section 10, "Education" and will complement the regional messages and activities.

8.5 Residential Section Effectiveness Assessment

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by the Education and Outreach team to track expenditures for designing, developing, and implementing BMPs and educational activities. Storm Water Pollution Prevention Division Education and Outreach Program annual report information will be submitted to the Storm Water Pollution Prevention Division URMP Program on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for department-specific reporting requirements and effectiveness assessment questions.

9.0 Illicit Discharge Detection and Elimination Section

9.1 Introduction

This program section is applicable to the General Services Department, Storm Water Pollution Prevention Division. The goal of the Illicit Discharge Detection and Elimination Program is to actively seek and eliminate illicit discharges and connections to the storm drain system. This goal is achieved through implementation of required monitoring, enforcement, and public education programs. Required sections of the Illicit Discharge Detection and Elimination include, for example:

- Dry Weather Field Screening and Analytical Monitoring,
- Investigation/Inspection and Follow-up,
- Ordinance Enforcement,
- Preventing and Responding to Sewage and Other Spills, and the
- Facilitation of a Public Hotline for Reporting Illicit Discharges and Connections.

In addition to the Illicit Discharge Detection and Elimination requirements, the City conducts other programs that result in the finding of illicit discharges and connections. An example of an existing program is the Coastal Storm Drain Monitoring Program. Monitoring programs under development include municipal separate storm sewer system monitoring, ("MS4 Outfall Monitoring"), Source Identification Monitoring, a Trash Monitoring Component to be included in several programs, and a Pyrethroids Monitoring Program. The Code Enforcement Section implements a public hotline for the purpose of public reporting of illicit connections and discharges to the storm drain system. The Storm Water Pollution Prevention Division's Monitoring Section currently conducts permit-required monitoring programs, including Dry Weather Monitoring, Coastal Storm Drain Monitoring, and all Investigations/Inspections and Follow-Ups that have not yet resulted in the identification of a responsible party. The Code Enforcement Section is responsible for ensuring the abatement of illicit discharges and connections. Beyond monitoring and enforcement, the City relies on its Storm Water Pollution Prevention Division Public Education and Outreach Program to reduce discharges by raising public awareness and encouraging behaviors that reduce the amount of pollutants released to the storm drain system.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit," Appendix I), as described in Table 9-1.

Table 9-1. Municipal Permit Requirements - Illicit Discharge Detection and Elimination.

URMP Section	Municipal Permit Section	Municipal Permit Requirement (Summary)
9.2	(Pg. 43) D.4.h	Facilitate public reporting of illicit discharges and connections, including a public hotline.

URMP Section	Municipal Permit Section	Municipal Permit Requirement (Summary)
9.3	(Pg. 43) D.4.g	Prevent and respond to sewage and other spills into its storm drain system from any source and provide a mechanism to receive notification of spills.
9.4.1	(Pg. 42) D.4.d; Section II. B.1 of Receiving Waters Monitoring; Reporting Program No. R9-2007-0001	Develop and Implement an MS4 Outfall Monitoring Program.
9.4.2	(Pg. 42) D.4.c; Section II.B.2 of Receiving Waters Monitoring; Reporting Program No. R9-2007-0001	Develop and Implement a Source Identification Monitoring Program.
9.4.3	(Pg.42) D.4.c; Section II.B.3 of Receiving Waters Monitoring; Reporting Program No. R9-2007-0001	Implement a Dry Weather Field Screening and Analytical Monitoring Program prior to May 1, 2008.
9.4.3.1	(Pg. 51) H	Implement a TMDL program
9.4.3.2	(Pg. 50) F	Implement a Regional Harbor Monitoring program
9.5	(Pg.42) D.4.(d,e,f)	Investigate and inspect the potential for illicit discharges and illicit connections. Eliminate detected illicit discharges and connections. Describe enforcement mechanisms and how they will be used.
9.6	(Pg. 45) D. 5. (b, d)	Implement and designate an educational program for all City personnel and contractors.
9.7 and Appendix XIII "Annual Report Form Questions"	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

9.2 Public Reporting of Illicit Discharges and Connections

The City of San Diego has an established hotline to promote, publicize, and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from the storm drain system. Reports of illicit discharges and connections can be conveyed to the City of San Diego Storm Water Division in English and Spanish 24 hours per day/seven days per week through the hotline (619 235-1000), e-mails (see http://www.sandiego.gov/thinkblue/contact.gov), and faxes (619-758-2309).

9.3 Spill Reporting, Response, and Prevention

Preventing and responding to sewage and other spills into its storm drain system from any source (including private laterals and failing septic systems) is covered under Section 6.8, "Metropolitan Wastewater Collection." In summary, when potential sewer spills are identified through the public hotline, visual observations or other means, Metropolitan Wastewater Department (MWWD) will investigate each case and where spills are identified, implement measures to abate the spill and prevent and/or remove sewage from the storm drain system caused by public spills. Private lateral spills or

failing septic systems that enter into the storm drain piping system will be abated by the General Services Street Division (see Section 6.14, “Streets/Storm Drain Conveyance System”).

To improve inter-department collaboration, the Storm Water Pollution Prevention Division will notify MWWD of spills reported to the storm water hotline. In addition, the Storm Water Pollution Prevention Division Code Enforcement Section will conduct follow-up inspections.

9.4 Urban Runoff Monitoring

9.4.1 MS4 Outfall Monitoring

The began implementation of a MS4 Outfall Monitoring Program in the 2007-08 monitoring year. The goal of this program is to characterize pollutant discharges from storm drain system outfalls in each watershed during wet and dry weather. This program includes collection of samples for those pollutants known to be causing or contributing to violations of water quality standards within the watershed. This program will result in the identification of illicit discharges and connections, requiring follow-up investigations and enforcement actions.

9.4.2 Source Identification Monitoring

The City will begin implementation of a Source Identification Monitoring program in the 2008-2009 monitoring year. The goal of this program is to identify sources of discharges of pollutants causing the priority water quality problems within each watershed. Focused monitoring which moves upstream into the watershed will be necessary to identify pollution sources. Monitoring efforts will be guided by source inventories and “Threat to Water Quality” analyses. It is expected that this program will result in the finding of illicit discharges and connections, requiring follow-up investigations and enforcement actions.

9.4.3 Dry Weather Field Screening and Analytical Monitoring

The goal of the Dry Weather Program is to detect and eliminate illicit connections and illegal discharges to the storm drain system by monitoring dry weather discharges at 500 monitoring stations (excluding alternate stations). Street Division maintains and is continually updating a ”Storm Drain System Map” (see Appendix IV) which will be used to determine dry weather monitoring stations. Stations are selected based a non-random system that ensures equivalent and adequate coverage of the entire storm drain system. The non-random system considers locations that are downstream of suspected illegal or illicit activity; are located to the farthest downstream accessible location practicable; hydrological conditions, total drainage area, traffic density, age of structures/buildings, area history, and land use. The City has clearly identified each dry weather field screening and analytical monitoring station in a GIS layer.

The City has developed written procedures for dry weather field screening and analytical monitoring that are consistent with 40 CFR part 136. These procedures include standardized field observations, monitoring, analyses, including numeric action levels that trigger follow-up investigations. The City will conduct dry weather field screening and analytical monitoring at least once per station during the prescribed dry weather monitoring period of May 1 through September 30. If flowing or ponded runoff is observed at a station, and there has been at least 72 hours of dry weather, staff makes observations and collects appropriate grab samples. Standard observations include general information such as station identification/sample/sampler information, static station information, land use information, atmospheric observations, runoff characteristics, and flow information. A minimum of 25% of flowing or ponded stations will be analyzed for analytical constituents including the following:

(a) Total Hardness
(b) Oil and Grease
(c) Diazinon and Chlorpyrifos
(d) Cadmium (Dissolved)
(e) Lead (Dissolved)
(f) Zinc (Dissolved)
(g) Copper (Dissolved)
(h) Entercoccus bacteria
(i) Total Coliform bacteria
(j) Fecal Coliform bacteria

Field Screening constituents collected at all locations where flowing or ponded runoff is present include the following:

(a) Specific Conductance (to calculate Total Dissolved Solids)
(b) Turbidity
(c) pH
(d) Reactive Phosphorous
(e) Nitrate Nitrogen
(f) Ammonia Nitrogen
(g) Surfactants (MBAS)

At locations where no flowing or ponded runoff is present, the sampler will make appropriate observations, and will then choose another station from a list of alternate monitoring locations.

Trash assessments will be completed at each monitoring location in order to provide information on the spatial extent, amount of trash, and nature of types of trash present at the location.

9.4.3.1 Total Maximum Daily Loading (TMDL) Development for Impaired Water Bodies

Chollas Diazinon TMDL

The City monitors for Diazinon, Chlorpyofros, and dissolved metals in Chollas Creek as required by Order R9-2004-0277. The City has implemented a monitoring program that:

- Collects wet weather samples at two existing locations, and
- Inspect storm drain facilities.

The City is required to strictly manage the runoff and discharge of Diazinon to Chollas Creek. The City implemented educational best management practices (BMPs) and inventoried large pesticide applicators in the watershed. Monitoring data has shown a dramatic decline in the Diazinon and Chlorpyofros levels in the creek.

Chollas Creek Dissolved Metals TMDL

The San Diego Regional Water Quality Control Board (Regional Board) adopted the Chollas Creek Dissolved Metals TMDL on June 13, 2007. Once adopted by the State, the Regional Board will require the watershed jurisdictions to develop a Pollutant Source Reduction Plan. The City will collaborate with the other watershed dischargers to develop and submit the required plan to the Regional Board for approval. Upon approval of the plan, the City will assist in the implementation of the plan which includes initiation of BMPs and monitoring. The City is planning to implement a monitoring program that will:

- Collecting wet weather samples at two existing locations, and
- Inspect storm drain facilities.

Once the TMDL has been implemented, the City will be required to strictly manage the runoff and discharge of dissolved metals to Chollas Creek.

It is important to note that the City has initiated program planning efforts to address the Metals TMDL, among other pending and anticipated TMDLs throughout the City's jurisdiction, through its Watershed Urban Runoff Management Plans (WURMPs). Information regarding the City's planning and implementation efforts will be reported through the WURMP annual reporting process.

9.4.3.2 Regional Harbor Monitoring

The Regional Harbor Monitoring Program (RHMP) was developed by the Port of San Diego, Orange County, the City of San Diego, and the City of Oceanside in response to a July 24, 2003 request by the Regional Board under §13225 of the California Water Code. The RHMP is a comprehensive effort to survey the general water quality and condition of aquatic life in the harbors and to determine whether beneficial uses are being met for the following four local harbors: San Diego Bay, Mission Bay, Oceanside Harbor, and Dana Point Harbor. The program is composed of a core monitoring program with potential focused studies to answer specific questions. The core

monitoring program was designed to address the following five major questions posed in the Regional Board's request:

1. What are the contributions and spatial distributions of inputs of pollutants to harbors in the San Diego Region and how do these inputs vary over time?
2. Are the waters in the harbors safe for body contact activities?
3. Are fish in harbors safe to eat?
4. Do the waters and sediments in the harbors sustain healthy biota?
5. What are the long-term trends in water quality for each harbor?

Implementation of the RHMP began with a Pilot Program to verify the design of the program. Prior to the initiation of sampling in the Pilot Program the following tasks were completed to finalize the design:

- Acquire and analyze relevant available historical information.
- Complete detailed mapping to verify stratum areas.
- Identify the indicators to be monitored.
- Establish the threshold levels.
- Establish the preset target proportions.
- Develop a Quality Assurance Project Plan.

A key element of the RHMP is the identification of strata within and across the harbors. This element was modeled after the regional Southern California Bight (Bight) and national Environmental Monitoring and Assessment (EMAP) programs. The use of strata allows delineation of harbor inputs based on activities within each area. Five strata were identified for monitoring in the core program: marinas, industrial/port, freshwater influenced, shallow water, and deep water. The shallow and deep water strata encompass all areas within the harbors not within the other three specific strata. The freshwater influenced stratum includes areas that may be affected by input from streams or storm water runoff (Weston, 2005).

Sampling for the Pilot Program began in August 2005. The Pilot Program is designed to run for three years with sampling conducted during the summer months. Full implementation of the RHMP will occur in 2008 and coincide with the next regional Southern California Bight Monitoring Program. The Pilot Program is a scaled down version of the RHMP that focuses on a limited number of indicator measurements and samples in two of the five identified strata. The strata sampled in the Pilot Program, marinas and freshwater influenced, were selected because the variability within them is anticipated to be greater than in the other three strata and thus will provide a conservative estimate of the amount of sampling needed to detect trends.

The RHMP report reviewing the results of the second year of the Pilot Program has been submitted to the Regional Board in July 2007. As such, it focuses on the measurements made in August 2006 for the marina and freshwater influenced strata in

the four harbors, making comparisons using the binomial approach to historical data and compares the results of the two sampled strata to each other. At the end of the third year of the Pilot Study, the stakeholders will submit a report reviewing and analyzing the analytical results.

9.5. Follow-up and Enforcement

The following section is a description of the procedures utilized by the Storm Water Pollution Prevention Division Code Enforcement Officers when investigating violations of the City's Storm Water Management and Discharge Control Ordinance. This discussion is followed by a description of the actual enforcement mechanisms utilized by the Code Enforcement Section staff.

9.5.1 Investigative Procedures

1. *Monitor for storm water violations including commercial, industrial, mobile, residential, and municipal activities.*

Code compliance officers are assigned to work a specific area and respond to reports of alleged violations. Methods of investigation include direct observation, drive-bys, foot patrols, odors, evaluation of ecological assemblages, and storm drain inspections.

2. *Investigations*

Code enforcement staff will respond in a timely manner to reports of alleged discharges to the storm drain system, such as alleged spills from private sewer laterals. Code enforcement staff documents the nature of the discharge using complainant information, observations, photographs and/or waste/wastewater sampling. From the information gathered during investigation of the discharge, code compliance staff eliminates the discharge, establishes required corrections, evaluates the storm water BMPs, provides suggestion to prevent future discharges, and takes appropriate enforcement action. Any complaint not within the jurisdiction of the City will be forwarded to the appropriate agency or jurisdiction within one working day.

3. *Follow-up Investigations*

Follow-up investigations/inspections will be conducted by the code enforcement staff for verified discharges and non-compliance infractions to ensure the elimination of illegal discharges, illegal connections, and compliance requirements have been met.

4. *Referrals*

Code enforcement staff will notify the Neighborhood Code Compliance Department, Environmental Services Department, Park and Recreation Department, Fire Department, MWWD, Streets Division, Engineering and Capital Projects Department, or

other appropriate agencies if additional remedial assistance is necessary. There are also coordination meetings between departments with code enforcement activities.

The Environmental Services Department addresses reports of illegal dumping and littering, enforcing San Diego Municipal Code (SDMC) Sections 54.0209 and 54.0210. The Environmental Services Department has Solid Waste Code Enforcement Officers who are responsible for anti-waste education and enforcing compliance with the City of San Diego Municipal Codes dealing with solid waste issues.

The Neighborhood Code Compliance Department (NCCD) addresses reports of illegal grading (i.e. grading without a permit). The Engineering and Capital Projects Department has responsibility for construction sites with permits. More details about construction site enforcement are included in the Construction Contracts section.

NCCD also abates the Development “nuisance flows.” “Nuisance flows” are defined as discharges that are exempted under the storm water ordinance where the discharge is creating a habitat for the growth of algae, mosquitoes, or other health hazards.

The Park and Recreation Department has jurisdiction over all City beaches. Dog feces on public property is defined as a nuisance under SDMC §44.0304.1 which states that failure to immediately remove dog feces to a proper receptacle constitutes a violation. This code is being aggressively enforced at Dog Beach at the mouth of the San Diego River. According to SDMC §12.0201, SDMC §43.0304.1 can be prosecuted as a misdemeanor (6 months in jail or $1000 fine) or at the discretion of the City Attorney's Office, an infraction (fine not to exceed $250).

5. Education

Educational material is provided to all responsible parties. When a responsible party for a discharge cannot be determined, the residences or businesses in the surrounding area receive a letter or educational materials that explain how to comply with the San Diego Stormwater Management and Discharge Control Ordinance (“Stormwater Ordinance”).

The Code Compliance Officers use discretion to determine if education alone will result in compliance. Factors that are considered are: the activity, past violations, nature of discharge, intent, and potential to cause harm to people or the environment. A description of available enforcement and education tools is more thoroughly described in Section 9.5.2, “Enforcement Mechanisms.”

6. Complaint and Violation Database

Code enforcement staff maintains case files on all complaints for reference, follow-up, and reporting to management and the Regional Board (e.g., the Jurisdictional Urban Runoff Management Program (URMP) Annual Report).

7. Follow-up call to complainant

Code enforcement staff will conduct a follow-up call to the complainant(s) if additional details on the nature of the complaint are needed, or when a return call is requested.

9.5.2 Enforcement Mechanisms

The City's ultimate aim is compliance with the Storm Water Ordinance and the Municipal Permit. While the City Code Compliance Officers have several different methods available to obtain compliance with applicable regulations, officers generally follow an established enforcement system to abate the violation and get the responsible party into compliance. This system is described below as progressive levels of enforcement.

Level 1. Educational letters, BMP documents, or pamphlets

Code enforcement staff utilizes level one enforcement when proof of an alleged discharge cannot be found or when the responsible party cannot be determined after a thorough investigation.

Level 2. Issuance of an Administrative Citation

Code enforcement staff utilizes level two enforcement when proof of discharge and a responsible party can be identified. Discharges that are less severe and smaller in nature generally receive an administrative citation. The Code Compliance Officer will generally include educational information on the types of BMPs that should be implemented thereafter to avoid future violations.

The administrative citation process has been revised and the fine amounts have been increased. The changes provide more flexibility and also will expedite enforcement actions for some discharges that are currently addressed under administrative civil penalties.

Level 3. Issuance of a Notice of Violation Notice and Order (Administrative Civil Penalties)

Code enforcement staff utilizes level three enforcement when proof of discharge and a responsible party can be identified and the discharge is more severe. A Notice of Violation (NOV) states that an illegal discharge has occurred (or is occurring) and establishes an abatement deadline. The Code Compliance Officer will generally include educational information BMPs that should be implemented thereafter to avoid future violations.

After reviewing all the case information, the Code Compliance Official determines the appropriate civil penalty, and issues a Notice and Order. The City may assess civil penalties up to $10,000 each day the violation continues, may recover the costs of

enforcement, and may establish other appropriate corrective measures. In the event the violator does not comply with the Notice and Order within the 14-day time period, an appeal hearing is scheduled, after which the Hearing Officer issues an Administrative Enforcement Order. The violator may appeal the Hearing Officer's decision by filing a writ requesting a hearing before the Superior Court.

Level 4. City Attorney Referral (Civil or Criminal Prosecution)

Code enforcement staff utilizes level four enforcement when the violator continues to discharge waste after the issuance of several NOVs or Administrative Citations. The case will be referred to the City Attorney Office to review for criminal prosecution. City Attorney referral is also appropriate for discharges of hazardous substances or hazardous waste.

9.5.3 Illicit Discharge Investigation/Inspection

The City will take immediate action to eliminate detected illicit connections, discharges, or discharge sources. The City refers to established action levels to determine if a monitoring result requires a follow-up investigation. The City has developed procedures for source identification and follow-up investigations to address monitoring results that have exceeded the established action levels.

Within two business days of receiving field screening results indicating an exceedance of action levels, the City will initiate an investigation to identify the source of the exceedance, or will provide the rationale for why the discharge does not pose a threat to water quality and does not require follow-up. Within two business days, where applicable, of receiving analytical monitoring results indicating an exceedance of action levels, the City will initiate an investigation to identify the source of the exceedance, or will provide the rationale for why the discharge does not pose a threat to water quality and does not require follow-up. City staff will immediately investigate monitoring stations where an illicit discharge is obvious.
City staff uses many of the following tools, data, and monitoring principles to aid in the detection of illicit connections, discharges, or discharge sources:

- Conveyance system bifurcation model to identify strategic sampling locations for IC/ID pollution tracking and abatement.
- Basic and advanced water testing methods for use by lab technicians, biologists, code compliance officers, and other non-storm water field personnel.
- Land use maps (including sensitive environmental resources).
- Watershed boundaries.
- Storm drain facility maps.
- 303(d) list for impaired water bodies.
- Historical water quality sampling data.
- High use recreational beaches and bays.
- Inter- and Intradepartmental programs goals and objectives.

- Region-wide benthic invertebrate monitoring data.

9.6 Education and Training

The Municipal Permit identifies five target communities to receive education using all media as appropriate:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

The Municipal Permit requires that the goals of education and outreach activities to targeted communities be two-fold:

1. To measurably increase the knowledge base and;
2. To measurably change the behavior(s) of the target audiences with regards to storm water pollutants found in the storm drain system.

For more comprehensive information on the roles of the Storm Water Pollution Division and other City Departments see Table 10-2 in Section 10.0, “Education.”

9.6.1 General Storm Water Training

This section describes City-wide trainings provided by the Storm Water Pollution Prevention Division.

New Employees

The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. All new staff will receive a basic introduction to storm water issues via a “Storm Water and You” training module presented at the “New Employee Orientation” workshop. Staff that do not take the “New Employee Orientation” workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Existing Employees

Existing employees with regular access to a computer will be mandated to receive “refresher” training in storm water pollution prevention every two years via a City-wide training element developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment via “e-tests” for randomly selected City employees with regular computer access will occur periodically between the mandated “refresher” courses. Finally, the Storm Water Pollution Prevention Division will develop a computer-

based training (CBT) module addressing common activities shared by multiple field crews throughout the City.

9.6.2 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Storm Water Pollution Prevention Division Monitoring and Code Enforcement Sections in consultation with the Storm Water Pollution Prevention Division Education and Outreach Program (e.g., including the Think Blue logo on materials). Table 9-2 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 9-2. Department External Outreach Activities by Target Audience.

Department / Division Activity	Target Audience(s) 1. Construction Site Owners and Developers 2. Industrial Owners and Operators 3. Commercial Owners and Operators 4. Residential Community, General Public, and School Children 5. Under-represented audiences in 1-4	Schedule
Copy of	1-5	Ongoing
235-1000 Storm Water Hotline number to report illegal discharges	1-5	Ongoing
Think Blue educational brochure	1-5	Ongoing
Distribute “Contain, Control, Capture” BMP document	1-5	Ongoing
Business specific BMP Fact Sheets	1-3, 5	Ongoing
Clean Construction Brochure for construction sites	1	Ongoing
Construction BMPs flyer	1	Ongoing

9.7 Annual Report Forms

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by departments to track expenditures for designing, developing, and implementing BMPs and educational activities. The Storm Water Pollution Prevention Division Code Enforcement and Monitoring Sections’ annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, “Annual Report Form Questions” for department-specific reporting requirements.

10.0 Education Section

10.1 Introduction

In 2001, the City set a goal of reducing beach closures by 50 percent in the next four years. The City has a multi-faceted approach to achieving improvements in water quality. One of these elements is the Education and Outreach efforts known as, “Think Blue.”

The new Municipal Permit (see Appendix I) identifies five target communities to receive education using all media as appropriate.

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators and Mobile Businesses
- Residential Community, General Public, and School Children

These five audiences fall into two general categories of effort: internal and external. Internal encompasses all Municipal activities. External refers to the remaining three target audience groupings.

The Municipal Permit mandates that each Copermittee develop:

- Implement a five-year public outreach and education program
- Demonstrate a measurable increase in target audience knowledge of the storm drain system(s)
- Achieve a measurable change in the behavior of the target audiences regarding storm water pollution.

To meet this mandate, the City is implementing a strategic public information and outreach plan that brings together a host of tools, tactics, and activities with the overall goal of measurably increasing the knowledge and decreasing the polluting behaviors of target audiences.

The City’s program must meet the requirements of the Municipal Storm Water Permit (Order No.R9-2007-0001, “Municipal Permit”, see Appendix I), as described in Table Table 10-1.

Table 10-1. Permit Requirements – Education

URMP Section	Municipal Permit Section	Requirement (Summary)
10	(Pg. 45) D.5.a.1	Educate each target community on laws, regulations, BMPs, Jurisdictional Urban Runoff Plan (URMP), and other topics as appropriate

10.3	(Pg. 45) D.5.a.2	Create educational programs with an emphasis on underserved audiences, high-risk behaviors, and "allowable" discharges, including various ethnic and socioeconomic groups and mobile sources
10.2	(Pg. 45) D.5.b.1	Municipal Departments and Personnel Education
10.3	(Pg. 46) D.5.b.2	New Development and Construction Education
10.3	(Pg. 46) D.5.b.3	Residential, General Public, School Children Education
10.3	(Pg. 50) F.1.	Develop and Implement a Regional Residential Program
10.4	(Pg. 67) J. 3. (c, g, j); (Pg. 51) G. 3	Track and submit data for Annual Report Forms, track and report anticipated and actual fiscal year budget expenditures.

10.2 Staff Training Element

In general, the Storm Water Pollution Prevention Division is responsible for providing general training to employees to provide a guideline and promote awareness of storm water issues to employees whose primary jobs have little or no impact and relation to storm water. Individual departments, particularly those with field crews that have more opportunity to cause a discharge into the storm drain system will be responsible for training its employees in the Best Management Practices for protecting storm drains as well as proper cleanup of potential pollutants. Training specifics include:

General Storm Water Training

New Employees
The Storm Water Pollution Prevention Division is responsible for developing and providing all new employee trainings. New staff will receive a basic introduction to storm water issues through a "Storm Water and You" training module created by the Storm Water Pollution Prevention Division and presented at the "New Employee Orientation" workshop. Staff that do not take the "New Employee Orientation" workshop (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation from their department.

Existing Employees
Existing employees with regular access to a computer will be mandated to receive "refresher" training in storm water pollution prevention every two years through a City-wide training element to be developed by the Storm Water Pollution Prevention Division. Additionally, knowledge assessment through "e-tests" for randomly selected City employees with regular computer access will occur periodically between the mandated "refresher" courses. Finally, the Storm Water Pollution Prevention Division will develop a computer based training module (CBT) addressing common storm water best management practices (BMPs) for common activities shared by multiple departments.

The following Table 10-2 diagrams the type of City employee and the type of trainings provided over the term of the Municipal Permit.

Table 10-2. Comprehensive Municipal Training Table

Training	New City Employees- Field and non-Field	All Existing City Employees (Non-Field)	Field Crew Employees
New Employee Orientation Training "Storm Water and You"	RQ		
Refresher Training - once every two years		RQ	RQ (for employees with regular computer access)
Activity Specific BMP Training –Annual			RQ
E-test of Randomly Selected City Employees – Annual	R	R	R (for employees with regular computer access)
Common Activity Specific Computer Based Training – Annual*			RQ

RQ= Requirement; R=Recommended
*or other equivalent annual review as identified by the Department

Activity-Specific Training for Municipal Departments

Departments that perform work activities specifically identified in the Municipal Permit and/or perform work that can directly impact water quality will provide activity-specific storm water training. The department will create, execute and fund activity-specific training sessions. These trainings must introduce work processes, functions and behaviors that incorporate the minimum BMPs necessary for staff to prevent illegal discharges into the City's storm drain system. It is the City's intention to provide the most in-depth and frequent trainings to those employees and departments whose work offers the most potential impact to storm water. Activity-specific BMP Training(s) and their frequencies are provided by the specific departments throughout the City as necessary and are detailed in the various specific sections of the URMP (see Section 3.0, "Development Planning Section", Section 4.0, "Construction Section", Sections 6.X.4.3 in the municipal sections, and Section 8.0, "Residential Section").

The Storm Water Pollution Prevention Division will utilize the City's billing system as a mechanism to reach residents, mobile businesses, and commercial/industrial facilities to educate them on the minimum BMPs. Storm water pollution prevention messages have been imprinted on water bills and storm water informational flyers are distributed with Business License renewals through the Department of the City Treasurer. The City will

continue to explore distribution of storm water messages through City billing as appropriate.

The Storm Water Pollution Prevention Division and other City Departments have created a host of training materials to convey important pollution prevention practices to employees. Often, a variety of training methods are employed to ensure employee recognition and retention of the information. These include, but are not limited to:

Training Videos – Videos provide the opportunity to reach large groups of employees at convenient times, and provide basic information related to storm water pollution prevention. Videos can also be a precursor to more detailed, activity-specific training. Some training videos are already in development for the Storm Water Program.

Training Workshops – Workshops can range from the very general – providing basic information like that mentioned above under "Training Videos," while also allowing for interaction with workshop participants – to the activity specific bringing pertinent information specially tailored for workshop attendees and their areas of responsibility. City workshops are currently in development.

Activity-Specific BMP Training – City department's that perform storm water-related activities will receive a variety tailored to fit their staff needs. Examples include:

- Tailgate sessions
- Field demonstrations
- Classroom computer simulation
- Information exchange through collateral materials such as reference binders, posters, work station storm water bulletin boards, etc.

Departmental Flyers – Storm water related messages are posted in key employee areas in various departments throughout the City in an effort to keep employees apprised of new information as well as reinforce core prevention messages.

BMP Manuals – Some City departments have created detailed training manuals that provide important information regarding practices and procedures with regards to storm water pollution prevention, among others. The City's Park and Recreation Department's BMP Manual recently received recognition from the Federal Environmental Protection Agency as a model for other municipalities to emulate.

Novelty Items – "Think Blue" pencils, key chains and stickers are provided to employees, and serve as reminders of the City's commitment to storm water BMPs.

10.3 Educational Outreach Element

Successful education and outreach programs should be founded on a carefully aligned set of communication goals that complement one another and yet recognize the varied audiences, tools and techniques that must be considered and involved in order to achieve meaningful communications and ultimately, the program mission.

Specific goals and objectives identified by the City include:

- Supporting the overall mission and objectives of the City of San Diego's Storm Water Program and this URMP to *"increase the knowledge and reduce the polluting behaviors of target audiences."*
- Establishing the City of San Diego as credible, first source of storm water pollution program information to City and regional media,
- Identifying diverse audiences and carefully targeting sustained communications through Community Based Social Marketing accordingly,
- Ensuring distribution of clear, concise and consistent information to target audiences,
- Fostering cooperative approaches with Copermittees that ensure widespread distribution of consistent information,
- Cultivating an employee base that is knowledgeable about storm water pollution prevention issues and techniques, thereby changing City activities accordingly and also carrying pollution prevention messages throughout the community,
- Demonstrating a measurable increase in target audience knowledge of the storm drain system(s), and a measurable change in the behavior of the target audiences regarding storm water pollution,
- Fostering widespread, comprehensive and long-term school-age education programming related to storm water pollution prevention

Audiences/Stakeholders

For the purposes of this plan, the City has broken down the external target audiences to include:

- Local Community Based Interest Groups
- Organizations Associated with Tourism and Transportation
- Homeowners Associations
- Print and Broadcast Media
- Ethnic Organizations
- Higher Education Institutions and School Districts
- Local Youth Groups and Leagues
- Local Private Schools
- Civic and Social Organizations (Rotary, Lions, etc.)

- Seniors Centers and Organizations
- Mobile Businesses
- Industrial Owners and Operators
- Commercial Owners and Operators
- Construction Site Owners and Developers
- New Development

City of San Diego Demographic Make-up

Like the State of California, the City of San Diego is richly diverse – with diverse backgrounds, attitudes and interests that must be considered in tailoring outreach and education programs. According to the 2000 Census, San Diego's African-American population is made up of 92,830 residents, or 7.6% of the City's population. Asian-Americans and Pacific Islanders consist of 170,206 residents, which is 13.9% of the population. Hispanic residents are the largest minority group with 310,752 residents, 25.4% of the population. Caucasian residents comprise 603,892 residents, or 49.4% of the population. The remaining 45,720 people are of various ethnicities such as American Indian and Middle Eastern. The total population of the City was estimated at 1,223,400 residents. The average income of residents is $45,041, which is down slightly when compared in constant dollars in past years. The average age of the following ethnic groups are: African-Americans 28.5, Asian-Americans 31.5, Hispanic 25.4, White 38.4, Other 30.6, overall 33.7. The industries with the largest employment are: manufacturing 12%, wholesale trade 15%, government 20%, and services 31%.

In 2006, the San Diego Association of Governments conducted an estimated census for the area and determined that San Diego's current African-American population is up of 94,535 residents, or 7% of the City's population. Asian-Americans and Pacific Islanders consist of 199,383 residents, which is 16% of the population. Hispanic residents continue to be the largest minority group with 354,136 residents, 27% of the population. Caucasian residents comprise 608,873 residents, or 46% of the population. The remaining 54,235 people make up the rest of the various ethnicities. The total population of the City is 1,311,162 residents. The average income of residents is $47,816, when compared in constant dollars to the previous census. With these trends in mind, the City began to conduct research that would best reduce storm water pollution while keeping in mind the changes in demographic and the City's population as a whole.

City of San Diego 2007 Survey

In January 2007 the City of San Diego conducted a population representative random digit dial telephone survey of 800 residents. The objectives were to provide a new baseline measure of awareness, attitudes, and behaviors relative to storm water pollution, determine potential barriers to behavioral, assess different potential motivations for change including barriers and provide information that can be used in

formulating a community based social marketing program. The questionnaire and data analysis are available at www.ThinkBlue.org in the Literature section for the "2007 Survey of City Residents." The survey covered:

- Overall perceptions of the City's ability to address and correct pollution concerns
- Possession of selected sources of pollution,
- Vehicle issues (washing, oil changing, radiator draining),
- Litter issues,
- Garden issues (green waste disposal, watering, use of pesticides, herbicides or fungicides,
- Dog issues (dog waste cleanup),
- Sewer issues (blockages, line cleaning),
- Beach issues (frequency of visitation, bird feeding, using the water rather than finding a restroom, beach closures),
- Storm drain system knowledge
- Methods and willingness to incorporate changing behaviors to reduce storm water pollution
- "Think Blue" slogan awareness and retention, and
- Information sources.

Among key survey findings were:

- Three in four respondents believe that pollution of the ocean, bays and beaches is a very important issue facing the City (of the issues presented) and tied as the most important with the quality of public schools
- The high level of awareness and concern about the problem of storm water pollution suggests that residents are open to learning more about how to address it.
- Residents give the City moderate ratings for preventing pollution in storm drains and for preventing pollution of San Diego's creeks, bays, and oceans.
- The most frequently observed behaviors are people washing their cars on the driveway or in the street, dog waste being left on the sidewalk, lots of litter in the neighborhood, pesticide or weed-killers being used on the lawn or garden, and litter being blown from trash bins that are left uncovered.
- Fewer than half the adult residents of San Diego correctly know that storm water is not treated.
- Most residents are aware that neighborhood storm drains contribute to pollution of San Diego's creeks, bays, and ocean.
- Name recognition for "Think Blue San Diego" was down slightly from the 2004 survey
- There was a strong interest in learning how to reduce storm water pollution, to reduce beach closures, and to clean up litter in their neighborhood.
- Actions that respondents would most likely take to help reduce storm water pollution include: recycling used motor oil, washing paint brushes in the sink

instead of the street, keeping trash and recycling bins covered, picking up litter and trash on the street, fixing oil leaks, sweeping the sidewalk instead of washing it down, and fixing sprinklers so they don't wash soil on the street.

- Actions that respondents would least likely take to help reduce storm water pollution include: washing cars on the lawn rather than a driveway or street, purchasing less polluting products if they cost more, taking the car to a carwash, using barriers or a wet-vac to keep wash water from going in the street after cleaning stucco or concrete, and picking up other people's dog waste.
- Top barriers to reducing storm water pollution include a lack of time and education, and a sense from respondents who don't visit the beach that pollution does not affect them.
- Three-quarters of residents said they would be much more likely to take action to prevent storm water pollution: to protect the health of those who swim in the ocean, to protect the marine environment, to preserve the environment for the next generation (because water is something we all share), and to create a neighborhood free of trash (because it is safer).

Outreach Strategy – Community Based Social Marketing (CBSM)

In recent years, many public and private organizations have implemented programs and interventions designed to promote a diversity of environmentally responsible behaviors including recycling, energy conservation, hazardous materials disposal, and compliance with environmental policies. Traditionally, these approaches have been largely information based, and the majority of the existing programs consist of distributing information about a particular problem or behavior. This approach is based on an assumption that if individuals knew what they should do, they would do it. Although these information-based campaigns can positively increase awareness and attitudes about a specific behavior or problem, they have been shown to be largely ineffective at creating lasting changes in behavior.

A major component of the Municipal Permit is to measure effectiveness of education and outreach by observing and quantifying behavior changes of the target audience. The City will be employing a new outreach strategy, Community Based Social Marketing (CBSM) in an effort to develop sustainable behavior change in key populations and audiences located in areas of the City that have significant levels of pollutants of concern as identified by the Municipal Permit.

CBSM packages basic principles of social psychology with applied research methods to provide a usable framework for practitioners working to promote behavior change. CBSM uses a four-step process to fostering sustainable behavior change. These four steps are as follows:

(1) Identify the barriers to a target behavior. A barrier is anything that decreases the likelihood that an individual will engage in the desired behavior. Barriers to engaging in sustainable behaviors vary depending on the population, context, and behavior of

interest, and multiple barriers can exist simultaneously for each behavior. Barriers can be either internal to the individual (e.g., motivation) or external to the individual (e.g., structural elements of the program). Barriers for the target behavior can be identified through literature reviews, focus groups, and surveys.

(2) Use behavior change tools to overcome the barriers. Psychological research offers an arsenal of principles and techniques that can be used to motivate behavior change. These tools may include providing normative information, using commitment and consistency, and using the norm of reciprocity. The most appropriate tool is selected and incorporated into intervention and program materials that will overcome the identified barriers and change behavior.

(3) Pilot the selected tools using empirical research methodology and a control group. A key element of the CBSM approach is to pilot the program with a small portion of the community using an intervention and a control group. If the pilot is not successful, the strategy should be refined and then piloted again. If the pilot is successful at changing behavior, the strategy can be implemented more broadly.

(4) Evaluate the project once it has been widely implemented. Once the successfully piloted program is in place within the community, CBSM requires that the program be carefully evaluated by comparing baseline measures of behavior to behavior at several points in time following the intervention. Wherever possible, the large-scale evaluation should also include a control group.

Initial Program Messages – Minimum BMP Communication

As required by the Municipal Permit, the City has identified minimum BMPs for the following audiences:

- Residential
- Commercial
- Industrial
- New Development and Construction
- Mobile Businesses

These minimum BMPs are included in Appendices X, XI, and XII, and in Section 3, “Development Planning” and Section 4, “Construction.” To achieve Municipal Permit compliance, BMPs are promoted and presented to the various target audiences above through a variety of outreach tools and threaded into the City’s CBSM pilot projects as appropriate. Some of the outreach tools the City intends to employ include:

- The “Think Blue” web site (www.ThinkBlue.org)
- Fact sheets
- Brochures
- Public Service Announcements

- Code compliance officer interaction with the public
- Speakers Bureau presentations
- Special events
- Television interviews
- Press releases

Additionally, special care will be taken to contact hard-to-reach communities through alternative media, non-traditional outreach partnerships, and social organizations.

Special Targeted Outreach Initiatives

The City will target key sources of pollution identified through CBSM pilots, water quality monitoring trends, and/or enforcement activities during high usage media timeframes to help raise public awareness and reduce pollution. The intent is to perform a highly visible, high profile outreach intervention coupled with increased enforcement and other City resources, as appropriate, to target a clearly-defined pollution source. For example, in June 2007 the City created an intensive outreach campaign to address beach closures due to high bacteria counts in anticipation of the high-traffic July 4th holiday. The City targeted RV users, boaters and beach goers in an attempt to educate them to take simple steps to help reduce pollution and keep the beaches open. The City handed out tip cards and conducted one-on-one meetings with beach goers.

Traditional Outreach and Education Tools

CBSM is a labor- and resource-intensive strategy that is best employed in critical areas of the City where sources of pollutants are easily identified and where traditional outreach alone will not achieve water quality objectives. Traditional education and outreach tools will continue to be employed by the City for broad messaging themes used in the following tools:

"Think Blue" Program Logo and Slogan – The City is looking to refresh the "Think Blue" brand by establishing iconic imagery and other brand elements to revitalize interest in the campaign and the messages it carries.

Advertising – Focused message campaigns, and particularly those that are aimed at promoting behavior change like "Think Blue", are very well suited for advertising. Well-placed advertising is a crucial part of the Storm Water Program's outreach and education efforts. Advertising methods can include:

- Newspaper space such as small ads or full-page messages
- Billboard space
- Advertisements in specialty brochures (i.e., Tourism)
- Radio drive-time
- Air time on local network and cable stations

- Free time from cable, radio, TV network during prime time
- New media including movie theatres, podcasting, blogs, etc.

Displays/Kiosks – Displays and information booths offer a low-cost means of providing information on a broad basis. Once developed, these displays can be used in a variety of venues – airports, civic buildings, museums, shopping malls and other high traffic areas to share information and ideas.

Special Newspaper Inserts – Newspapers clearly offer a relatively low cost means of reaching mass groups of people in the San Diego region. Many newspapers offer the opportunity to sponsor a special newspaper insert which, in this case, would be devoted to storm water pollution prevention. Typically, extra copies of the insert can be purchased for later distribution.

Storm Water Hotlines – The 619-235-1000 Storm Water Hotline has received more that 17,000 calls since its inception in 2002. The hotline provides the public the opportunity to contact the City if someone witnesses an illegal discharge entering the storm drain system. The hotline has been an invaluable asset in helping the Storm Water Pollution Prevention Division Code Enforcement Section cite and educate those residents and businesses that violate the San Diego Stormwater Management and Discharge Control Ordinance ("Stormwater Ordinance"). In addition, the City continues to partner with the County of San Diego's 888-THINK-BLue Hotline that allows County residents to call in illegal discharges.

Public Access Channels – The City's City TV24 government access cable channel has been a useful resource for the delivery of storm water messaging to the public. In addition to airing "Think Blue" Public Service Announcements and Storm Water Hotline slides, the channel helped in the production of the "Storm Water and You" municipal training video created in 2002 which also ran on the TV station and served as a useful program for residents interested in learning more about simple steps they can take to help reduce discharges to storm drains.

Special Events – Special events offer a host of opportunities. They are generally attractive to the media, they offer public settings to local and regional officials and legislators, they can accommodate large numbers, and they can vary in cost and expanse depending upon program needs and budgets. The City is home to numerous, already-established events, such as community fairs. The Storm Water Program has been involved with and has supported these programs in order to spread its key messages.

There may also be appropriate occasions for the program to sponsor its own events to provide updates on the success of the program; Community Clean-up

Days; Toxic Collection Events and more. In the past, the Storm Water Program sponsored an "Urban Runoff" 5K race which it is considering reinstating.

Internet/ Web Page – The City has an established web site at www.ThinkBlue.org which is a source of a wide variety of information for residents and businesses alike. The site provides a number of resources including a listing of Clean Water Programs, an outreach literature page, offering program brochures, fact sheets, and public service announcements, news, information about Project SWELL, and a wealth of other resources. BMP information is available for businesses and industries located in the City and minimum BMP Fact Sheets will be housed on the City web page for all targeted audiences. In addition to the literature section, an educational resources link that connects users to storm water and watershed educational resources available from other institutions will also be available. Visitors to the site will also be able to view storm water television commercials and the City's general storm water training video.

Volunteerism- Volunteer opportunities are abundantly available for all citizens. By supporting volunteer efforts of employees associated with the Storm Water Program, the City is not only showing support of vital organizations and events, but also helping to establish an identify for the Program.

Speakers Bureau – A variety of civic, volunteer, business groups and others hold periodic meetings which spotlight invited speakers. The City can develop presentation materials, train key speakers, and work to get speakers on the agendas of these groups – significantly helping to expand the Storm Water Program's key messages and building a coalition of supporters.

Special Occasion Speeches – The City is host to a variety of community events throughout the year at which City leaders are asked to take part. Such events offer a prime example to include remarks about the City's Storm Water Program and achievements to date.

VIP Visits – The City also routinely hosts guests and dignitaries from throughout the nation and world. As national leaders are scheduled to visit the City (like EPA representatives, administrative officials, foreign dignitaries, etc.) their staffs may be receptive to including remarks that refer to, and therefore highlight, the Storm Water Program.

Community Ambassadors – As noted previously, there are numerous groups and individuals that the Storm Water Program will attempt to reach. Some efforts will be formalized, others will be less structured. By training designated City employees to work as Storm Water Program Ambassadors, a team of individuals will be available to attend homeowner meetings, participate in special events on the beach, man booths and community malls, etc. – allowing them to both share

information about the Storm Water Program as well as obtain feedback from interested citizens.

Direct Mail to Target Audiences – The opportunity to create direct mail pieces to specific audiences with tailored messages and specific Storm Water Best Management Practices exists and will be a tool employed by the City. Potential audiences include: businesses located on City owned and leased properties, tenant associations, Home Owner Associations (HOAs), and older residential communities with a history of sewage spills. The mailer pieces can range from postcards to newsletters, flyers and other pieces developed for a specific audience.

Media Relations

Radio Talk Shows – Radio talk shows are constantly in search of new and important issues for the community. Storm Water Program spokespersons have participated in regional talk shows, allowing a broad-reaching opportunity to share Program information, and allowing for feedback and discussion that will be important throughout the duration of the outreach and education activities.

Media Kits – Members of the media rely on the ability to obtain pertinent, factual and information on areas they are covering. A media kit – with a consistent design, and with pockets to hold information – will be useful throughout outreach efforts to offer press releases, biographical information on Program leaders, graphics and maps related to storm water pollution issues, and more. And the kit can serve other uses such as for packaging information for visiting dignitaries, legislator briefings, and more.

News Releases – If used sparingly and appropriately, news releases are of great value to reports and can offer factual information along with useful quotes from Program leaders. If a solid relationship exists between the media and an organization, releases may be used verbatim by print and electronic media – providing an affordable and effective means of sharing Program information.

News Conferences – News conferences should be reserved for the most newsworthy occasions. And it should be understood that even with the best planning, it is impossible to plan for other, competing news events that may win out of a Storm Water Program news conference. With that said, however, there may be events – such as a national recognition of the program, an emergency event having storm water pollution impacts – that are worthy of a news conference and can result in significant media coverage.

Promotions Through Broadcast Personalities– Californian's spend a significant amount of time in their vehicles – allowing excellent opportunities to bring key messages to listeners through broadcast personalities. "Think Blue"

has participated in a number of special sponsorships through radio and television that use on-air celebrities to serve as special advocates of the "Think Blue" program.

Public Service Announcements – "Think Blue" PSAs have won numerous awards including the coveted Emmy award for excellence. Additionally, a host of municipalities from both the United States and Canada have requested copies of "Think Blue" PSAs to reformat so that they pertain to their particular area. The City currently offers nine 30 second video PSAs and six 60 second audio PSAs and is in the process of producing a number of new PSAs that incorporate CBSM messaging. The City is also using these videos to tap into sponsorship opportunities with the San Diego Padres and is exploring opportunities with the San Diego Chargers and San Diego State University Aztecs. As part of the City's sponsorship the PSAs are played to fans in attendance.

Advertorials – Advertorials are advertisements that take on the look and feel of an editorial. Though advertorials would likely not be among the first communications tools chosen by the Program, they may be worthy of consideration once the success of other efforts are gauged.

Opinion Editorials – Storm water pollution prevention is an important topic to area residents, based on survey results, and residents are interested in learning more. This makes it an important issue for newspaper coverage as well. Based on these two facts alone, the Program is well situated to develop a guest editorial – typically situated on the page opposite the editorial page – which frames the issue, offer solutions and promotes behavioral changes. The Op Ed also provides the opportunity to position City leaders as champions of pollution prevention efforts.

Letters to The Editor – The popularity of the editorial page has only increased in recent years. Readers look to the page for varied perspectives on important issues. Storm Water Program staff should closely monitor these pages for issues that relate to the program, and for opportunities to provide comment, founded on key messages, in order to reach a large audience and, potentially, clarify inaccuracies or misperceptions.

Cable Television – Residents have access to a variety of specialized stations through cable television. As channels become more specialized, "Think Blue" is able to show its PSAs to specific audiences that are receptive and responsive to its messages.

Human Interest Stories – Human interest stories help bring personality and emotion to key messages. Since the Storm Water Program is focused on behavioral changes regarding pollution prevention, a human interest story would

offer an excellent opportunity to highlight the program, offer information, and show a real-life example of a resident, for example, taking on the cause.

B-Roll – As the Storm Water Program attempts to gain increased media attention to issues, availability of B-roll footage (or video footage absent sound in format usable by television stations) demonstrating key points – such as proper use of recreation vehicle waste stations, impacts of litter to beaches, etc. – can help television media to cover Program issues on short notice.

Partnerships

Success in reaching diverse residents and businesses from throughout the City can be significantly accelerated by implementing cooperative support efforts among two or more organizations and groups. Such cooperative ventures accomplish a number of important things. They expand the pool of individuals providing information and obtaining feedback. They publicly show that the issue is of significant importance to those beyond the Storm Water Program. They provide third-party credibility to the issue by involving others. And they assist in reaching specialized target audiences. Partnerships can take on many forms as well – from joint sponsorship of special events, BMP material development and dissemination, joint news releases, joint letters to legislators, and more.

Among groups that the Storm Water Program has worked with in the past and will continue to foster collaborative partnerships include:

- Higher Education Institutions
- Environmental Community (San Diego CoastKeeper, the Surfrider Foundation, the Environmental Health Coalition, San Diego River Foundation, Sierra Club, Audubon Society, I Love A Clean San Diego Inc, etc)
- Local School Districts/ San Diego Unified Schools, Oceanside School District
- Scouting Groups
- Construction Industry
- Business and Industry Groups
- Tourism
- Civic Associations
- Legislators

Government Relations

It is always important to have local legislators on board – or at least aware of – major communications campaigns. The same legislators can be very useful in disseminating key messages as well. Options to keep legislators up to date include:

- Testimony at appropriate legislative hearings
- Legislative Briefings for staff

- New Legislator Packets (with “Congratulations” letters)
- Mailings to legislators -- sending collateral materials, newsletters, article publications, etc.

Collateral Materials

Collateral materials are the mainstay of any education and outreach program and will be developed by the City, and in bilingual format as appropriate. It is desirable to both develop and disseminate these materials with the cooperation and support of local business and industry associations, as they can most effectively reach their members. Collateral materials can include a myriad of complementary support materials for both internal and external use such as:

Fact Sheets – Information sheets that provide bulleted, factual information about the overall Storm Water Program or a specific element of the program, and Best Management Practices for specific activities. These will be revised and updated to include minimum BMPs for residential, commercial and industrial audiences.

Frequently-Asked Question Sheets – Brief handouts that address questions most often encountered about the program, or specific elements, along with thorough responses.

Brochures – The City’s “Think Blue” brochure has been a primary component in delivering general storm water pollution messages to the public. The brochure, printed in English and Spanish is a concise, call to action to residents and businesses to be mindful of storm drain pollution and their impacts on water quality. The City has also produced a “3 C’s” brochure, which demonstrates the concepts of ‘Contain, Control and Capture,’ gives the public practical steps they can take to reduce runoff from entering the storm drain conveyance system. The City, through both its education and enforcement teams, has handed out thousands of these brochures to municipal employees, businesses and the general public.

Other Printed Materials – The Storm Water Program utilizes a number of other kinds of printed options including door hangers, information cards, handbooks among others to communicate general and specific messages to the public, including:

- Storm Water Door Hanger – this item serves as a friendly reminder for enforcement officers who see potential violations on residential and commercial property. The door hangers point out the potential storm water violations or issues the property appears to have, and provides useful suggestions on steps that can be taken to alleviate possible fines.
- Integrated Pest Management Cards (IPM) – Working in conjunction with the County of San Diego, the City helped produce 11 IPM cards promoting

environmentally safe alternatives for removing common insects instead of pesticides. The cards, printed in English and Spanish, were distributed at Home Remodeling and other various community events. Versions are also available on the "Think Blue" web site.

- Informational Booklets – In the past, the City has created informational booklets providing Best Management Practices in an effort to provide information to specific business types that have the a higher potential for causing illegal discharges into storm drains information. Examples include a "What's Cookin'" booklet for restaurants regarding the proper disposal of grease and other restaurant waste as well a "Green Wrench Guide" booklet which provided tips and procedures for home and commercial auto repair.

Bill Inserts – The Storm Water Pollution Prevention Division will utilize the City's billing system as a mechanism to reach residents, mobile businesses, and commercial/industrial facilities to education them on the minimum BMPs. Storm water pollution prevention messages have been imprinted on water bills and storm water informational flyers are distributed with Business License renewals through the Department of the City Treasurer. The City will continue to explore distribution of storm water messages through City billing as appropriate.

Internet/Web page – The City has utilized its "Think Blue" web site as a clearinghouse for any and all storm water related information. Electronic versions of news releases, fact sheets and collateral materials are available on line. As mentioned previously, Public Service Announcement and other outreach tools are available to the public through the site. The site also provides information on grants legislative updates and internal and external environmental reports. The City is investigating the possibility of revamping the site to provide more information and will explore expansion options in the years ahead.

Videos/PowerPoint Presentations – The City has been presenting to numerous community and government organizations regarding a host of storm water related issues. The City will continue to utilize opportunities to educate the public through Speakers Bureau presentations, presentations to City officials, community events, etc.

Maps and Graphics – Visual images can often speak volumes – particularly when attempting to communicate technical information. Some information associated with Program outreach will be technical. Schematics, graphic images, photographs and map will support outreach efforts and can easily be included in print materials, presentations, and videos.

Promotional Items – Promotional items sponsored by the Storm Water Program can provide inexpensive, eye-catching reminders of the Program and key messages. The Storm Water Program has already developed a host of

promotional items including “Think Blue” surfboard key chains, pencils, frisbees – for fun on the beach and to remind pet owners to clean up, and “Sweep It Up” dust pans. Additional promotional items will be developed as appropriate and as the budget permits.

Student-Age Education

Student-age directed outreach and education has been a long-term commitment for the City. Through its state of the art Project SWELL elementary school curricula, the City has determined that educating today’s youth not only provides a sound foundation of prevention habits for future adults, but also reaches family members through education efforts.

Project SWELL started as a collaborative effort between the City of San Diego, San Diego Coastkeeper, and the San Diego Unified School District. It is a school based curricula that teaches our children about the importance of our recreational waterways and human-water interaction through a well-balanced, comprehensive and hands-on water quality and pollution prevention curricula. Through the classroom, Project SWELL will help to empower and educated these future leaders of America to understand and improve the condition of our San Diego waterways improving our environment and our community.

This innovative approach to learning began with the inaugural rollout of Investigation 5 - reaching and teaching more than 20,000 5th graders attending San Diego Schools. The ultimate goal is to develop and implement a water quality and pollution prevention curricula for K-12 classrooms in San Diego Schools within the next 2-3 years. Project SWELL will ultimately reach approximately 140,000 students, grades K-12, in San Diego within the next 2-3 years. Currently we have developed lesson plans for 2nd, 4th, 5th, and 6th grade classrooms, and are working on the Kindergarten and 7th grade curricula.

Public Participation

Public participation is separately covered under Section, 10.1 of this Plan. It is important to note here, however, that public participation – or activities to allow for public input and involvement in efforts and decisions related to storm water pollution prevention – will be an integral part of the City’s outreach and education efforts. It is critical for the Public Education and Outreach messages and strategies developed by the City to have both direct and indirect feedback from our internal and external target audiences. This feedback allows the Storm Water Program to adjust messages, and the timeline in introducing them to the various audiences, depending upon how the foundation messages are understood and incorporated by the public.
Public participation opportunities covered more fully in Section 1.1 include:

- Speakers Bureau
- Community Group Outreach

- Meetings, Hearings and Workshops
- Tours and Open Houses
- Surveys and Focus Groups
- WEB page correspondence

External Outreach and Education Tools by Various City Departments

The Storm Water Pollution Prevention Division also enlists the aid of other City departments to help get its "Think Blue" message out to the public at large. As previously stated, the Municipal Permit requires outreach and education to the following external target audiences:

- Construction Site Owners and Developers
- Industrial Owners and Operators
- Commercial Owners and Operators
- Residential Community, General Public, and School Children

"Think Blue" messages can be found in bill inserts, information racks in department lobbies and libraries. Storm water staff is also enlisted to be part of speaker's bureaus and make presentations at community meetings hosted by other City departments in an effort to reinforce the importance of keeping storm drains clean and steps the public can take to help achieve this goal.

Specific education and outreach activities offered by the various departments are included in their department's primary section. Table 2-1 in Section 2.0, "Administrative and Legal Procedures" identifies each City department and provides the location of their primary section and, where necessary, the location of secondary sections. In addition, City departments may assist the Storm Water Pollution Prevention Division by distributing storm water related messaging through mailings, display racks newsletters, bill messaging, among others are located in sections most closely related to their specific area.

10.4 Outreach Section Effectiveness Assessment

The Municipal Permit requires the City to report on its storm water activities by September 30 each year beginning in September 2008. Also, each fiscal year a budget is developed and maintained by the Storm Water Pollution Prevention Division Education and Outreach Program to track expenditures for designing, developing, and implementing educational and outreach activities. The Storm Water Pollution Prevention Division Education and Outreach Program annual report information will be submitted to the Storm Water Pollution Prevention Division on or before July 21 each year. See Appendix XIII, "Annual Report Form Questions" for Department-specific reporting requirements and effectiveness assessment questions.

11.0 Public Participation Component

11.1 Introduction

While closely linked to public education efforts (see Section 10, "Education"), public participation involves interacting and assessing the public's willingness to participate and ability to retain storm water messages. In the past, public participation efforts focused on activities and communication efforts that not only allow for, but encourage, public input and involvement, and potentially collaborative decision making on programs and decisions related to storm water pollution prevention. Additionally, the City has chosen to pursue Community Based Social Marketing (CBSM) strategies, and therefore public participation plays the critical role in soliciting buy-in for behavior changes and utilizing their willingness to change behaviors to influence others.

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No.R9-2007-0001 "Municipal Permit" see Appendix I), as described in Table 11-1.

Table 11-1. Permit Requirements – Public Participation.

URMP Section	Municipal Permit Section	Requirement (Summary)
11.2	(Pg. 46) D.6	Incorporate a mechanism for public participation in the updating, development, and implementation of the Jurisdictional Urban Runoff Management Plan (URMP).
11.2	(Pg.61) 6.j	Describe steps to be taken to include public participation in the development and implementation of the URMP.

According to the recent 2007 survey, the City's Storm Water Pollution Prevention Division has an energized and concerned population with which to work. Community members are keenly interested in issues related to pollution of the ocean, bays and beaches (for a copy of the "Survey of City Residents 2007," prepared for the Storm Water Program (see Appendix XXI). It would appear based on survey responses that diverse members of the community are still receptive to learn more about keeping waterways clean as well as a willing to offer input and concerns and take action about this issue.

11.2 Public Participation Goals and Objectives

The City of San Diego has engaged and embraced the role public participation plays in the success of pollution prevention efforts. Specific goals and objectives identified by the City of San Diego for its storm water pollution prevention public participation efforts have, and will continue to, include:

- Continuing to promote the City of San Diego as not only a clean water leader but also a community partner and supporter of storm water pollution prevention efforts.
- Fostering established long-term relationships with stakeholder groups that will be beneficial to City's water quality efforts and other community programs.
- Continuing successful ongoing programs like Project SWELL, among others, under which key stakeholders are routinely involved.
- Furthering support of the overall mission and objectives of the City of San Diego's Storm Water Pollution Prevention Division and this URMP to *"increase the knowledge and reduce the polluting behaviors of target audiences."*
- Assessing the general understanding of the storm water pollution issue and developing collaborative ideas for changing and/or modifying behaviors through an annual random digit dial telephone survey of residents
- Continuing to solicit and address specific concerns and opportunities for various stakeholder groups through speakers bureau presentations
- Utilizing CBSM practices to identify messages that will resonate with key stakeholders and encourage behavioral changes (see Section 10, "Education" for details)
- Utilizing CBSM pilots to receive direct feedback from residents and businesses regarding best management practices (BMPs) identified for their particular community
- Holding public workshops on various storm water related projects and activities.
- Identifying evolving community concerns/interests
- Allowing for collaborative decision making on key issues impacting the general community or specific areas and interests
- Building a supportive group of citizens from various communities who will help shape and ultimately implement storm water pollution prevention activities and programs
- Providing measurements of program achievements through community input
- Utilizing the storm water hotline (619-525-1000) and web site (www.thinkblue.org) as information access points

Audiences/Stakeholders

During the Municipal Permit cycle, key stakeholders will be routinely assessed and evaluated. While initial efforts may focus generally on the topic of storm water pollution, subsequent participation efforts may be very narrowly focused either by watershed issues, or property-use issues, for example. At the outset, however, potential public participation audiences will include:

- Municipal Departments and Personnel
- Construction Site Owners and Developers
- Industrial Owners and Operators Commercial Owners and Operators
- Residential Community, General Public, and School Children

For purposes of this plan, the City of San Diego has further broken down target audiences under “Residential Community, General Public and School Children.”

Public Participation Strategies and Tactics

The City has actively engaged the public and key stakeholders in the development and implementation of the URMP. The URMP was presented and reviewed in several Public Utilities Advisory Committee (PUAC) meetings and the City has met with and received input and comments from stakeholders within the industrial and commercial communities. Additionally, the public has provided input for the URMP through the California Environmental Quality Act (CEQA) process.

In addition, the Storm Water Pollution Prevention Division is regularly called upon to provide testimony to the Natural Resources and Cultural Council established to address environmental issues. Storm Water Pollution Prevention Division staff is involved in the PUAC and its Storm Water Subcommittee in an effort to keep the public apprised of storm water issues and receive public input. As needed, the City will pose specific questions and bring significant issues forward to the committee for consideration.

Public participation will also be provided through traditional outreach and education venues. As the issues surrounding storm water evolves, so too will the City’s outreach methods. Tools available to the City of San Diego include:

Telephone Surveys – The City of San Diego has already conducted a baseline survey specifically related to Storm Water Pollution Prevention (see Appendix XXI, “Survey of City Residents”). This survey will be conducted annually to measure attitudinal and behavioral changes.

Mail Surveys – Mail surveys can give the City a snapshot of public opinion quickly and inexpensively. These can take the form or response cards in newsletters, newspaper “coupons”, or mailed questionnaires.

Focus Groups – Focus groups provide an excellent means of quickly obtaining input beyond that achieved through the survey format where respondents are often selecting from a predetermined choice of responses. Focus groups, in contrast, will allow for richer, more descriptive input and perceptions that are derived from group interaction during the focus group. Focus groups can be particularly useful in testing the effectiveness and resonance of strategic communications messages.

Information Phone Line **–** Some hotlines involve prerecorded messages that offer information to callers. Others allow for public participation opportunities and are staffed by knowledgeable representatives who can respond to and log caller inquiries and/or allow callers to leave messages that are answered at a later date. Through careful

tracking of calls, the City of San Diego can develop a valuable database of issues important to residents throughout the life of the outreach program.

The City has already partnered with the region by lending its "Think Blue" educational program brand to the County of San Diego which hosts the region-wide "Think Blue" hotline. It has an easy-to-remember phone number of 888-THINK BLue. The hotline is interactive and is staffed by a bilingual (English-Spanish) operator. Requests for information are forwarded the same day to the appropriate municipality.

Web Site – Today, the Internet is a first source of information for many Americans today. It can also be a tool for public involvement. While this is still an emerging technique, given the long-term nature of the Storm Water Program, the Internet should be considered a valuable public participation tool. The City's web site, www.ThinkBlue.org is interactive as it allows users to participate in on-line surveys, discussion boards, and opt-in e-mail lists. By serving as a comprehensive information repository, the Storm Water Program web site will encourage public involvement by informing the public about the important issues associated with the Storm Water Program.

Stakeholder Interviews – Meeting with stakeholders one-on-one provides an environment conducive to relationship and trust building. On a regular basis, stakeholders should be consulted in this type of format to learn about concerns, issues of interest and opportunities for the Program.

Speakers Bureau – Most speakers bureau engagements leave ample time for audience questions. And informal questions received prior to or after a speech can be equally informative. Again, the key will be to record and log question areas. After a series of speaking engagements, question trends and primary areas of interest will be apparent – helping to guide future outreach efforts.

Door-to-Door Canvassing – This type of interaction can be very useful – particularly if focused on a particular area. For example, as the City of San Diego moves to watershed based public participation and education, door-to-door canvassing can be useful in identifying issues particular to that geographic region. Of course, this strategy is labor and time intensive, so should be used in a limited fashion.

Information Booths/Kiosks – A host of opportunities exist for the City to set up an informational booths or kiosks during community events, or in high-traffic areas. The kiosks not only provide information to passers by, but can be staffed to allow one-on-one discussions with interested residents.

Meetings, Hearings, Open Houses, and Workshops – There will be times when a public meeting is the best way to exchange information with stakeholders and other target audiences. Other times, public meetings will be required by law. In either case, public meetings will be made more effective with ample noticing and careful planning.

Meetings, hearings and workshops need to be held at times and locations convenient for the public. When necessary, the meetings should be run by a third-party facilitator to encourage productive dialog.

Advisory Groups – Topic- or issue-specific advisory groups are often the best way to effect meaningful public participation. They are time consuming to convene and manage, but pay off in terms of better public decision-making. Topics that lend themselves well to this type of public participation tool include those that are highly controversial and/or complex. Advisory groups should represent a broad cross section of community interests and be facilitated by a third party to be most effective. They must have a clearly task and level of authority.

Partnerships – Some participation efforts may best be undertaken in coordination with well-established organizations. Examples of such groups include:

- Educational Institutions
- Environmental Groups
- Scouting Groups
- Construction Industry
- Business and Industry Groups
- Tourism
- Civic Associations
- Legislators

12.0 Fiscal Analysis

12.1 Introduction

The Storm Water Pollution Prevention Division is the City's division responsible for reporting on the Jurisdictional Urban Runoff Management Program's (URMP) fiscal analysis to the San Diego Regional Water Quality Control Board ("Regional Board") each year. The Storm Water Pollution Prevention Division annually collects financial information from City departments through the "Annual Report Form Questions" in Appendix XIII, as well as financial information from within the Division, analyzes the fiscal information, and reports the findings in the City's URMP annual report to the Regional Board.

This URMP section focuses on first identifying the estimated costs associated with the implementation of the URMP activities, and second, describes the processes the City will use to conduct the fiscal analysis each year. The goals of the fiscal analysis are to:

- Document the need for City departments and divisions other than the Storm Water Pollution Prevention Division to budget for URMP activities (e.g., administration, training, and BMP deployment).
- Document the need for the Storm Water Pollution Prevention Division to budget for all permit-required activities.
- Document the City's expenditures for activities that improve storm water quality but that are not specifically required by the URMP (e.g., trash and sewage collection, recycling programs, enforcement of littering ordinances).
- Provide data for future program and cost effectiveness analyses through the permit-required "Effectiveness Assessment" (see Section 13.0).

The City's program must meet the requirements of the Municipal Storm Water Permit (Order No.R9-2007-0001 "Municipal Permit," Appendix I), as described in Table 12-1.

Table 12-1. Municipal Permit requirements – Fiscal Analysis.

URMP Section	Municipal Permit Section	Requirement (Summary)
12	(Pg. 51) G.1 and G.3	Each Copermittee secures the resources necessary to meet all requirements of the Municipal Permit.
12.3	(Pg. 51) G.2	As part of the Regional Urban Runoff Management Program, the Copermittees will collectively develop a standardized method and format for annual reports in Fiscal Year 2009.

12.2 Fiscal Analysis Methods

Each City department reports on storm water activities and fiscal expenditures to the Storm Water Pollution Prevention Division as part of the URMP Annual Reporting process by July 21 each year. Additionally, each fiscal year a budget is developed and

maintained by departments to track expenditures for designing, developing, and implementing BMPs and educational activities.

After receiving the annual report form fiscal information from departments, Storm Water Pollution Prevention Division Fiscal Analysts prepare the Fiscal Analysis section of the URMP Annual Report for the entire City.

Our current Fiscal Analysis methods are as follows:

- Departments will be responsible for identifying and obtaining costs associated with Municipal Permit compliance, and will annually track and report its expenditures (see "Annual Report Form Questions", Appendix XIII).
- Storm Water Pollution Prevention Division will compile, review, and possibly modify all cost data from departments.
- Annually review financial assessment forms for all URMP sections, compile information, and incorporate into each year's annual report.
- Determine the annual budget for Storm Water Pollution Prevention Division, and include in the annual report to the Regional Board.
- Determine potential revenue sources for Storm Water Pollution Prevention Division.
- The final budget is approved by City Council through a budget ordinance prior to the beginning of each fiscal year.

12.2.1 Five-Year Budget Forecast

The adoption and implementation of the updated URMP will increase expenditures by the City. While the majority of the City's expenditures for URMP are administered by the Storm Water Pollution Prevention Division. The General Services Department's Street Division budgets significant amounts of money for permit-required street sweeping and storm drain system inspection, cleaning, and maintenance. Other departments also designate funds from their budget to comply with the Municipal Permit.

In the Mayor's Five-Year Financial Outlook for 2008-2012 Storm Water has been identified as a critical City program that requires additional funding for the next 5 years. Based on preliminary estimates, the Municipal Permit will require Storm Water Pollution Prevention Division expenditures of $18.2 million in fiscal year 2008 and $36 to $37 million each year thereafter. Additional expenditures will be required by other City departments. The City's estimated costs to implement the 2007 Municipal Permit are reflected Table 12.2.

Table 12-2. Estimated Storm Water Pollution Prevention Division and Streets Division Budgets for Storm Water Permit Compliance.

Municipal Permit Year/Budget Period*	Cost**
Fiscal Year 2008 (July 1, 2007 - June 30, 2008)	$42,995,409
Fiscal Year 2009 (July 1, 2008 - June 30, 2009)	$53,200,000
Fiscal Year 2010 (July 1, 2009 - June 30, 2010)	$54,264,000
Fiscal Year 2011 (July 1, 2010 - June 30, 2011)	$55,349,280
Fiscal Year 2012 (July 1, 2011 - June 30, 2012)	$56,456,266
Fiscal Year 2013 (July 1, 2012 – June 30, 2013)	$57,585,391
Total Five-Year Cost:	**$319,850,346**

*The five-year permit cycle extends over six fiscal years between January 24, 2008 and January 24, 2013.
**Actual implementation of the activities identified in the Urban Runoff Management Program is dependent upon identification of funding in future yearly budgets and City Council approval. These costs do not include all reporting departments.
**These estimates include planning cost for TMDLs/ASBS which are initially being planed to help implement URMP.

Currently, funding for Permit-required activities undertaken by the Storm Water Pollution Prevention Division and the Street Division is provided by the City's General Fund with approximately $6 million in revenue from the City's Storm Drain Fund. In the future, some of this cost could be offset by increased storm drain fees, but any additional dedicated funding would require a vote of the public.

To comprehensively address the water quality and storm drain infrastructure improvement needs within the City, including the complex series of Municipal Permit, Total Maximum Daily Load (TMDL), and Areas of Special Biological Significance (ASBS) regulations that are either in effect or scheduled to be adopted during this Municipal Permit cycle, the City needs to prepare a storm drain system master plan. This plan is anticipated to result in capital projects and priorities for system improvement. Because the majority of future system improvement cost estimates will not be identified until TMDL regulations are fully adopted, these costs are not included in Table 12-2 and will be addressed at a later date.

12.3 Update to Fiscal Analysis Methods

The City's fiscal analysis process will be updated and expanded in the Fiscal Year 2009 Annual Report after a standardized format is developed by the co-permitted jurisdictions (Copermittees) under the Municipal Permit.

13.0 Effectiveness Assessment Section

13.1 Introduction

13.2 Effectiveness Assessment Approach

This section will describe the Copermittee's updated approach to annually assessing the effectiveness of its JURMP (Permit sections I.1 and J.1.a.(1)(l)). A specific, detailed organization is not proposed for this section, but, at a minimum, it will include at least the following:

- *A description of how the Copermittee will incorporate Implementation Assessment, Water Quality Assessment, and Integrated Assessment in its effectiveness assessment approach.*
- *Identification of measurable targeted outcomes, assessment measures, and assessment methods to be used to assess the effectiveness of: (1) Each significant jurisdictional activity or BMP to be implemented; (2) Implementation of each major component of the JURMP; and (3) Implementation of the JURMP as a whole.*
- *Identification of which of the outcome levels 1-6 will be utilized to assess the effectiveness of each of the items listed above, as well as a discussion demonstrating the inapplicability or infeasibility of any outcome level is determined to not be applicable or feasible for a particular BMP, activity, or component, or the Copermittee's JURMP as a whole.*
- *A description of the steps that will be taken to utilize monitoring data to assess the effectiveness of each of the above items.*

Note: Copermittees may elect to reference or summarize Regional URMP Section 6.2 to address some or all of the required content of this section. However, each Copermittee will be responsible to individually meet the requirements of Permit sections I.1 and J.1.a.(1)(l) for any particular BMP, activity, or component not addressed in the RURMP.

13.3 Program Review and Modification

This section will describe a process for reviewing and updating the Copermittee's effectiveness assessment process. At a minimum, it will include the following (Permit sections I.1.b and J.1.a.(1)(v-vi)):

- *A description of steps that will be taken to improve the Copermittee's ability to assess program effectiveness;*
- *A time schedule for when improvement will occur;*

Year	Activity
FY 2008	
FY 2009	
FY 2010	
FY 2011	
FY 2012	

- *A description of steps that will be taken to identify aspects of the Copermittee's JURMP that will be changed, based on the results of the effectiveness assessment.*

Copermittees may also include this section to reserve a location for identifying and documenting future modifications to the Effectiveness Assessment Component.

NOTE: This section in under development as a regional Copermittee effort. The outline is included here. The final version will be included in the Final URMP document.

14.0 Modifications to the JURMP

In order to improve the efficiency and effectiveness of the City's efforts in protecting and improving water quality, the City updated its Jurisdictional Urban Runoff Management Plan (URMP) with notable changes as described below in Table 14-1. The changes not only ensure compliance with the Municipal Storm Water Permit (Order No. R9-2007-0001, "Municipal Permit", see Appendix I), but in many cases exceed the minimum requirements in the Municipal Permit in the City's continual effort to clean up our creeks, rivers, beaches and bays.

Table 14-1. Modifications to the URMP from 2002 to 2007.

Section	Notable Changes
Introduction	– No major changes
Administrative and Legal Procedures	– No major changes
Non-Storm Water Discharges	– Updated list of allowable non-storm water discharges
Development Planning	The updated Storm Water Standards Manual reflects: o A regional Hydrologic Modification Plan in order to curb erosion of channel beds and banks o Low impact development (LID) concepts required for all new development and redevelopment projects o More effective best management practices (BMPs) o Priority Development Projects are required to employ LID site design BMPs o The amount of impervious surface runoff that must be routed to pervious areas has been clarified – Developed an inspection program to ensure maintenance of permanent BMPs – The updated General Plan and Multiple Species Conservation Plan reflect a watershed-based, low impact approach to improving water quality in the region
Construction	The updated Storm Water Standards Manual reflects: – Additional controls for construction sites that could result in a discharge of sediment directly to 303(d) listed water bodies, coastal lagoons, and water bodies on environmentally sensitive lands – Phased grading must be implemented at construction sites according to a designated maximum disturbed area and exposure period. – Advanced treatment for sediment at construction sites determined to be an exceptional threat to water quality – More effective, prioritized site inspection schedule – More stringent enforcement measures – Monthly construction site inventory
Municipal (in general)	– Established minimum BMPs for all City staff and contractors – Increased activity/area-specific BMPs with associated pollutants – Increased municipal facility inspections from one to two per year for areas discharging to sensitive lands/waters (all facilities) – Increase in staff education and training – Improved BMPs in municipal operation and maintenance contracts

Section	Notable Changes
	– Improved data tracking capabilities
Airports	– Non-aviation leased properties now categorized as industrial/commercial and will be inspected by Storm Water Pollution Prevention Division
Buildings/Parking/ Landscaping	– Additional departments are involved in the URMP process – Focus on Integrated Pest Management – Additional public outreach through libraries, community service centers, business licensing
City-Owned Leased Properties	– All City-owned leased properties categorized as industrial/commercial or residential and will be inspected as such by Storm Water Pollution Prevention Division
Household Hazardous Waste Program	– Established BMPs for one-day collection events
Non-Emergency Fire/Rescue Activities	– Improved vehicle rinsing and washing procedures for lifeguards
Non-Emergency Police Activities	– Section developed specifically for Police – Includes BMPs for canine, mounted patrol, and shooting ranges
Metropolitan Wastewater Collection	– Clarified the roles of Metropolitan Wastewater Department (MWWD) in private/public sewer spill clean-ups
Metropolitan Wastewater Treatment and Maintenance	– Activity-specific BMPs expanded
Recreational Lands and Facilities	– Established inspections for special events
Solid Waste Management	– Activity-specific BMPs expanded
Special Events	– Improved BMPs and inspections for special events
Stadium	– Improved BMPs and inspections for special events – Updated contract language for lessees
Streets	– Prioritized schedule for increased street sweeping frequency based on trash and debris accumulated in streets – New schedule for storm drain system maintenance – Clarification on the frequency and timing of storm drain and municipal parking lot cleaning
Vehicle Maintenance/ Operations Yards	– Activity-specific BMPs expanded
Water Systems	– Improved BMPs for special events
Industrial and Commercial	– Created mobile businesses program – Included City owned-leased properties in inventory and inspection responsibilities – Increased inspection requirements to 500 in dry weather – Established minimum industrial/commercial BMPs
Residential	– Use of community based social marketing (CBSM) methods to promote behavioral changes – Regional approach developed by Copermittees will be tailored for URMP program – Established minimum residential BMPs
Illicit Discharge	– Increased number of dry weather program samples and sites

Section	Notable Changes
Detection and Elimination	– New sampling programs include trash monitoring, pyrethroid monitoring, storm drain outfall monitoring, and upstream source identification monitoring for water bodies with a specific constituent of concern – Accelerated follow-up investigations for dry weather exceedances to within two working days – Improved coordination procedures between Storm Water Pollution Prevention Division, MWWD, and Street Division to abate and clean up sewage spills in the storm drain system – Investigations and follow-ups are more proactive – Increased enforcement program hours to nights and weekends
Education	– Targeted underserved audiences – Increased outreach to commercial/industrial businesses – Increased assistance for departments' municipal activity- specific training – Increased oversight on general municipal employee training and follow-up evaluations
Public Participation	– Targeted underserved audiences
Fiscal Analysis	– Incorporated cost component to program effectiveness assessment methodology (i.e., cost-benefit analysis) in order to maximize pollutant reduction efforts – Improved data tracking capabilities
Effectiveness Assessment	– Expanded focus from simply maximizing pollutant load reductions (effectiveness), to also include cost effectiveness (efficiency)

15.0 Conclusion and Recommendations

Since the last Municipal Permit was issued in January of 2001, the City has made great strides in it's efforts to protect and improve water quality. The Mayor and City Council have shown a strong commitment to clean storm water by increasing Storm Water Pollution Prevention Division funding by over 800% between Fiscal Year 2005 and 2008. The Mayor identified storm water as one of his eight significant areas within the City's Five Year Financial Plan (http://www.sandiego.gov/mayor/pdf/five_year _plan_11_15.pdf). The Storm Water Pollution Prevention Division continues to be a leader in the region and nationally through it's Think Blue education and outreach campaign, and it's partnerships with stakeholders in the region.

Continuing in this leadership role, the City incorporated many improvements into the URMP— above and beyond basic Municipal Permit requirements— to improve effectiveness, efficiency, and streamline resources. A summary of the changes is outlined in Section 14.0, "Modifications to the URMP." Notable changes include:

- Each department made significant improvements to internal water quality protection practices and procedures.
- The City will conduct a second inspection of municipal areas and facilities each year to ensure proper maintenance and use of good housekeeping practices and other BMPs.
- For both public and private new development/ redevelopment projects, the Storm Water Standards Manual has been updated with increased BMP requirements and inspection schedules.
- Increased staff education and training will occur across the City.
- Street Division will significantly increase it's storm drain cleaning and street sweeping programs.
- The Storm Water Division will significantly increase efforts in all of it's core programs including, facility inspections, enforcement, water quality monitoring, education and outreach, and municipal coordination.

In conclusion, the City of San Diego is committed to its mission to protect and improve the quality of its receiving waters through the implementation of this URMP and its other programs. Further, the City is committed to continual improvement of it's pollutant reduction efforts. At the core of its URMP program, the Storm Water Pollution Prevention Division has established an iterative implementation strategy that most efficiently obtains its goals through continual program planning, implementation, assessment and improvement. A summary of the key program recommendations the Storm Water Pollution Prevention Division has identified to guide future efforts is highlighted below.

Recommendations

1. Strategically and Comprehensively Address Regulatory Programs

The City must address several state and federal storm water quality regulatory programs now and in the coming years. In addition to Municipal Permit requirements, the City must comply with State-mandated Areas of Special Biological Significance, or ASBS, requirements in the La Jolla Shores area. The ASBS requirements require zero discharge of any pollutants from the City's storm drain system at any time, regardless of storm size. In addition, the City must address future storm water quality regulations called Total Maximum Daily Load programs, or TMDLs. Drawing from the Clean Water Act, TMDL programs will set numeric or concentration based pollutant discharge limits at every storm drain outfall within the City. Though compliance costs are not definitively known, it is clear that achieving this network of requirements and protecting our valuable natural surface and recreational water resources will require early strategic planning efforts and an approach that considers all regulations concurrently.

2. Maximize Efficiencies of Program Efforts

Updating and improving the URMP document is but one component to the Storm Water Pollution Prevention Division's overall efforts; the Storm Water Pollution Prevention Division recognizes the critical importance of maximizing efficiencies and water quality protection efforts. Rather than taking an activity's effectiveness for granted, the Storm Water Pollution Prevention Division is continually asking, 'How can we achieve greater pollutant reductions through our efforts?' To help answer this question, the City recently completed a "Strategic Plan for Watershed Activity Implementation" (July 2007), which outlines a process for piloting a series of coordinated activities and assessing and improving their effectiveness so that the City can both maximize the efficiency of individual activities, such as street sweeping efforts, and also implement the most effective combination of activities at a program level to maximize overall water quality protection efforts. After improving activities through pilot programs, the City will implement these activities City-wide to continually strengthen its URMP program and address TMDLs and other regulations.

3. Explore Options For Securing Dedicated Funding