THE CITY OF SAN DIEGO

Jurisdictional Runoff Management Plan

January ~~2019~~ 2021

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The City of SAN DIEGO

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Executive Summary

The Jurisdictional Runoff Management Plan (JRMP) is the City of San Diego's approach to improving water quality in its rivers, bays, lakes, and ocean through reducing discharges of pollutants to the municipal separate storm sewer system (MS4; hereafter, "storm drain system"). As the operator of a storm drain system, the City of San Diego (City) is subject to a National Pollutant Discharge Elimination System (NPDES) Municipal Permit issued by the Regional Water Quality Control Board, San Diego Region (RWQCB). The permit requires the City to reduce pollutants in discharges from its storm drain system to water bodies.

The City's storm drain system, like that of most other jurisdictions across the United States, conveys most runoff from rain, irrigation runoff, natural groundwater seepage, and other sources of water to water bodies without first being directed to a treatment plant. To reduce pollutants in these storm drain system discharges to water bodies, the City implements or requires its residents and land owners to implement a variety of measures commonly referred to as Minimum Best Management Practices (BMPs) for Residential, Industrial, Commercial and Municipal Sites/Sources. Some examples of BMPs include covering potential pollutant sources to prevent contact with rain, employing erosion reduction techniques at construction sites, adjusting sprinklers to eliminate irrigation runoff, sweeping streets and parking lots, and building green infrastructure techniques like planters that capture and treat runoff along streets.

Permit-Required Plans:

- Jurisdictional Runoff Management Plan (1)
- Water Quality Improvement Plans (6)

The most recent permit, RWQCB Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), requires the City of San Diego and the other 20 municipal agencies in San Diego County to prepare both jurisdictional and watershed scale plans that detail how they will comply with the new requirements. Each agency, including the City, prepares its own JRMP. The JRMP is an update to the City's 2008 Jurisdictional Urban Runoff Management Plan (JURMP), which was prepared in response to the 2007 Permit. The watershed plans, known as Water Quality Improvement Plans (WQIP), are collaboratively prepared by the municipal agencies and each focus on a particular watershed. The Storm Water Division of the Transportation & Storm Water Department has led the City's efforts to update this JRMP and six WQIPs.

Water Quality Improvement Plans

The City has participated in the preparation of WQIPs for the six Watershed Management Areas (WMA) in which it has jurisdiction. Those WMAs and the City boundaries are shown on Figure ES-1, and the WMAs are also listed below from north to south:

- San Dieguito River
- Peñasquitos
- Mission Bay/La Jolla
- San Diego River
- San Diego Bay
- Tijuana River

Each WQIP identifies the highest priority water quality condition(s), or problems, and the corresponding numeric goals, strategies, and schedules to address those problems. All strategies from the six WQIPs are included in the JRMP, as described below.

Figure ES-1. Watershed Management Areas in which the City has Jurisdiction

JRMP and Additional Strategies to Improve Water Quality

Two types of strategies to improve water quality are included in both the JRMP and the WQIPs, as described below.

JRMP Strategies

These strategies describe the day-to-day operational activities and processes to improve water quality required by the Municipal Permit. Both the Storm Water Division and other City departments and divisions are responsible for implementing these JRMP strategies. The introduction to each section of this document identifies the JRMP strategies included in the WQIPs that fulfill the Municipal Permit requirements for that JRMP section, as well as the department(s) or division(s) responsible for implementing those strategies. Each City department or division is responsible for implementing the applicable JRMP strategies to meet Municipal Permit requirements.

As explained in more detail in JRMP Section 10, the Storm Water Division has further separated its day-to-day operational activities and processes into flood risk management programs that are associated with the JRMP, such as infrastructure repair and replacement,

and other activities and processes necessary to meet JRMP requirements specified in the Municipal Permit.

Additional strategies

These strategies go above and beyond the City's day-to-day operational JRMP activities and processes to meet water quality goals established in the WQIPs and are referred to as "enhanced" JRMP strategies and "optional" strategies. These strategies are needed to further improve water quality to comply with more stringent regulations, such as Total Maximum Daily Loads (TMDLs) and Special Protections for Areas of Special Biological Significance (ASBS), which are also required by the Municipal Permit. The Storm Water Division, not other City departments, is responsible for implementing these strategies. Enhanced JRMP and optional strategies are identified at the end of each JRMP section, where applicable and enhanced JRMP strategies are marked with an asterisk.

JRMP Strategies: day-to-day operational activities and process to improve water quality required by the Municipal Permit.

WQIP Strategies: activities and process that go above and beyond the City's JRMP strategies to meet water quality goals established in the WQIPs

All JRMP and WQIP strategies are included in the JRMP.

The full list of JRMP, enhanced JRMP and optional strategies the City will implement is included as Appendix XX of the JRMP. The associated projected funding needs to implement those strategies have been included as part of the fiscal analysis in Section 10, and additional detail is provided in Appendix XXII.

JRMP Components

As a result of new Municipal Permit requirements specific to jurisdictional programs and additional program enhancements to address highest priority water quality conditions within the six watersheds in which the City has jurisdiction, changes have been made to program components described in the City's 2008 JURMP. The components of the City's updated JRMP are discussed below, including changes with respect to the 2008 JURMP.

Introduction

The introduction includes a discussion of the general regulatory background leading up to the creation of this JRMP and the general objectives of updating the JRMP. City setting information, land use statistics, a map of the City's storm drain system, and information about Environmentally Sensitive Areas within the City are also included in this section.

Program Organization and Legal Authority

This section described the City's legal authority to implement its storm water program. It also identifies and describes the departments within the City that conduct and oversee runoff management activities. An organizational chart that illustrates the relationships between the various City departments is also included.

Key changes made with respect to the 2008 JURMP are summarized below:

- Added detail about legal authority, as outlined by the Municipal Permit.
- Revised departmental roles and responsibilities to account for changes in departmental organization.
- Provided additional detail on roles and responsibilities of different departments and divisions.

Illicit Discharge Detection and Elimination (IDDE)

Newly updated prohibitions of various non-storm water discharges—discharges of water that do not originate from rain—and the City's approach to controlling such discharges are included in this section. These discharges can increase pollutant loads in the water that flows to the City's storm drain system and eventually to receiving waters. The categories of non-storm water discharges the RWQCB or City has determined to be significant sources of pollutants are identified, and the appropriate control measures the City has identified to reduce the discharge of pollutants from such non-storm water discharges are discussed.

This section describes the processes by which illicit connections and illicit discharges (IC/IDs) are detected by the City. This includes the receipt and recording of violation reports made by both the general public and City personnel regarding storm water pollution and the City's Dry Weather Major MS4 Outfall Discharge Monitoring Program. The City's sanitary sewer overflow and other spill response and prevention methods are also described.

Key changes made with respect to the 2008 JURMP are summarized below:

- Combined the non-storm water discharge section with IDDE section.
- Revised the discharge prohibitions and exceptions. Some non-storm water discharges that were previously conditionally allowed are now prohibited or more strongly regulated by the Municipal Permit. Eliminating irrigation runoff is expected to be a major focus across the San Diego region over the remainder of the Municipal Permit term (2015 through 2018).
- Updated discussion on dry weather monitoring procedures including IC/ID prioritization and follow-up.

- Provided more detail on public complaint response procedures and spill response actions.
- Provided more detail on IC/ID investigation methods not associated with MS4 outfall monitoring.

Development Planning

The development of urban areas has the potential to negatively impact the surrounding environment. The addition of impervious surfaces can alter the natural drainage patterns of the area, and development can facilitate the introduction of pollutants to the environment resulting from human activities. The City has incorporated water quality provisions into its General Plan. The City has updated its Storm Water Standards Manual, which establishes the specific post-construction BMP requirements for development projects. The updated Storm Water Standards Manual, that went into effect on February 16, 2016, is included in Appendix VII. This section also discusses updated procedures for treatment control BMP maintenance verification activities. Methods for maintaining a prioritized, watershed-based inventory of completed projects with treatment control BMPs and conducting associated maintenance inspections are also included in this section.

Key changes made with respect to the 2008 JURMP are summarized below:

- Added more specific procedural information specifically outlining the roles and responsibilities of different departments, divisions, and sections.
- Updates to the Storm Water Standards Manual will incorporate new, more stringent Priority Project Category definitions and storm water treatment and flow control requirements. These standards will increase the number of projects required to implement green infrastructure, such as bioretention and infiltration, and will also increase the level of treatment required.

Construction

This section includes information and regulations applicable to construction activities within the City and discusses updates made to the City's watershed-based inventory of the construction sites within the City. Construction site inspection frequencies and methods are presented. This section also discusses procedures for ensuring that both private development projects and Capital Improvement Program projects provide proper construction BMP plans and obtain coverage under the State Water Resources Control Board Construction General Permit, Order No. 2009-009-DWQ, as amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ, when necessary.

Key changes made with respect to the 2008 JURMP are summarized below:

- Provided more detail about enforcement procedures.

Industrial and Commercial

This section discusses how the City updates and maintains its watershed-based inventory of industrial and commercial facilities, including mobile businesses. The City continues to utilize a similar prioritization procedure for industrial and commercial facilities based off the experience and knowledge gained through the inspections conducted during the previous permit cycle. The Minimum Industrial and Commercial BMPs for industrial and commercial facilities have been updated and are included as Appendix IX at the end of this JRMP. This section also includes a discussion of facility inspection frequencies and procedures.

Key changes made with respect to the 2008 JURMP are summarized below:

- Incorporated property based inspection approach and procedures.
- Revised inventory management procedures to include all industrial and commercial land use within the City, not only specified categories of businesses previously required. This results in previously non-inventoried properties like office parks and research and development facilities being added to the inventory.
- Revised threat to water quality prioritization procedures.
- Updated Minimum Industrial and Commercial BMPs to address updates to the Municipal Permit and Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code Sections 43.0301 to 43.0312) (Storm Water Ordinance), to address deficiencies commonly observed during inspections over the past Permit cycle, and to increase clarity. The updated Storm Water Ordinance and BMPs are included as appendices I and IX, respectively
- Added a retrofit and rehabilitation program, as required by the Municipal Permit (Appendix XIX). This program identifies potential locations for BMP retrofits or stream restoration projects within areas that have already been developed. Projects from this list may be undertaken as funding is identified. The retrofit and rehabilitation program applies to all areas of existing development: industrial, commercial, municipal, and residential.

Municipal

This section provides a discussion of the City's municipal properties and the process for maintaining its watershed-based inventory. The Minimum Municipal BMPs, including those for special events, have been updated and are included within each of the departmental subsections within the municipal section. The municipal section also identifies inspection frequencies and procedures for municipal site inspections.

Key changes made with respect to the 2008 JURMP are summarized below:

- Formatted Minimum Municipal BMPs to parallel the City's updated Minimum Industrial and Commercial BMPs. Where current Minimum Municipal BMPs were more detailed or prescriptive than proposed business BMPs, they were retained. Refinements to BMPs based on discussions with departmental staff have also been incorporated.
- Listed Minimum Municipal BMPs and activity-specific BMPs within each departmental subsection for ease of reference. Each departmental subsection is intended to contain the information that the responsible departments need to comply with applicable requirements without significant cross references to other portions of the JRMP.
- Clarified which departments and divisions are responsible for implementing the activities described within each subsection.

Residential Areas

The new requirements that have been incorporated into the residential inventory are included in this section. This section also provides a description of the newly updated residential oversight program and the oversight methods the City staff will use to implement the program. Minimum Residential BMPs required to be implemented for residential areas and activities are included in Appendix IX.

Key changes made with respect to the 2008 JURMP are summarized below:

- Developed Minimum Residential BMP requirements (Appendix IX).
- Created an inventory of Residential Management Areas (RMAs) and protocols for patrolling the RMAs, both included in Appendix VI, and developed an associated inspection/oversight program. The RMAs are based on a combination of the City's existing neighborhood designations and watershed boundaries.
- Provided more details on methods of residential inspection and oversight, including responses to hotline calls and contributions by field staff outside the Transportation & Storm Water Department's Storm Water Division.

Public Education and Participation

Outreach efforts specifically tailored for target communities and activities within the City are discussed. The updated education programs and activities that the City uses to foster awareness and encourage behavioral changes relating to storm water activities are presented in this section. Information regarding educational programs conducted by the City, including content, form, and frequency, are discussed in detail in this section. This section describes the mechanisms that are used to encourage public participation in the City's storm water program and the development of this updated JRMP.

Key changes made with respect to the 2008 JURMP are summarized below:

- Provided more detail on educational tools used to communicate updated requirements for all target audiences.
- Updated list of underserved communities and the discussion of how underserved communities are identified and prioritized.

Fiscal Analysis

The means by which the City funds its day-to-day operational JRMP activities is discussed in this section. This section includes citywide projected funding needs associated with the implementation of JRMP activities and provides the methods of reporting the yearly fiscal analysis in the Annual Report. The Storm Water Division's projected funding needs to implement WQIP strategies and flood risk management activities are also included to provide a full picture of the costs to implement the MS4 Permit.

Key changes made with respect to the 2008 JURMP are summarized below:

- Present projected Storm Water Division JRMP, WQIP, and flood risk management funding needs for FY 2016 through FY 2035. This period extends from the first year the updated JRMP will be implemented through the date when the City's last WQIP final goal is expected to be achieved. Funding needs are based on the 2015 update to the City's Watershed Asset Management Plan and are summarized in Appendix XXII. The numbers presented in Appendix XXII reflect the Division's anticipated funding needs in 2015, and will be updated as needed, to reflect current and refined funding needs based on new information, potential changes to water quality regulations, and/or operational/programmatic changes. Updates to the Watershed Asset Management Plan and funding needs may be posted on the Storm Water Division website, www.sandiego.gov/stormwater, when needed.
- Present projected JRMP funding needs of all other City departments and divisions for FY 2016 - FY 2019. This period covers the remainder of the Permit cycle, which ends in 2018, plus one additional year to account for the possibility of a delay in the issuance of the next Permit update.

Enforcement Response Plan

The City has developed enforcement tools and procedures that will be used, as necessary, to bring about compliance with requirements to implement BMPs and eliminate IC/IDs. The City has developed an Enforcement Response Plan (Appendix XIII) that summarizes the City's approach to enforcing its storm water requirements. The details of the enforcement approach for each program component are presented in that component's section for ease of reference by staff who will implement the program on a day-to-day basis. The main function of the Enforcement Response Plan document is to provide a reference that lists

where enforcement details applicable to each of the different program components can be found in the JRMP.

JRMP Implementation

Each City department is committed to implementing the relevant procedures and BMPs described in this JRMP. The goal of these actions is not only to meet regulatory requirements, but also to improve water quality for the City's residents. Results from the City's implementation of the JRMP will be documented and reported each year as part of the annual reporting process, similar to the approach in past years. Jurisdictional program data will be a significant part of the WQIP annual reports in watersheds in which the City has jurisdiction, and annual assessments will be completed through the WQIP annual reporting process. As part of the adaptive management and iterative approach, the City will refine its programs accordingly as new lessons are learned. Modifications to the JRMP will be documented to ensure clear communication and transferability from one staff person to another. Modifications to the JRMP require the approval of the Mayor or designee per the amended Storm Water Ordinance.

Certification

1.0 Introduction

Storm water pollution prevention is imperative for the protection of human health and the natural environment. Storm water pollution is a problem not only during a storm but also year-round during dry weather, due to human activities such as industrial operations, construction activities, over-irrigation, and littering. While the impact of runoff pollution may not be immediately realized, the cumulative effects can be dramatic. For instance, bacteria are commonly found in our coastal waters, along with soil particles, solids/debris, litter, oil, and chemical compounds that kill aquatic organisms and can cause human illness.

Potential storm water contaminants include harmful viruses and parasites that cause human illness. 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, harming aquatic organisms. Fertilizer constituents from lawns, 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 municipal separate storm sewer system (MS4; hereafter, "storm drain system") and receiving waters making them muddy, turbid, and inhospitable to natural aquatic organisms. Sediment and trash can also transport bacteria downstream.

The Storm Water Division of the Transportation & Storm Water Department is the lead for the City of San Diego's (City) efforts to reduce pollutants in runoff to the maximum extent practicable (MEP) and is supported by many other City departments in its efforts.

Figure 1-1 illustrates the Storm Water Division's mission and goals.

Figure 1-1. Storm Water Division Mission and Goals

Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), requires the City of San Diego and the other 20 municipal agencies subject to the Permit to prepare both jurisdictional and watershed scale plans that detail how they will comply with the new requirements. Each agency, including the City, prepares its own Jurisdictional Runoff Management Plan (JRMP). The watershed plans, known as Water Quality Improvement Plans (WQIP), are collaboratively prepared by the municipal agencies and focus on a particular watershed. The Storm Water Division has led the City's efforts to update this JRMP and six WQIPs.

The City has participated in the preparation of WQIPs for the six Watershed Management Areas (WMA) in which it has jurisdiction. Each WQIP identifies the highest priority water quality condition(s), or problems, and the corresponding numeric goals, strategies, and schedules to address those problems. In addition to documenting the City's day-to-day operational activities and processes to improve water quality, the JRMP also includes enhanced WQIP strategies. These enhanced strategies go above and beyond the City's JRMP activities, and are needed to further improve water quality in the region to comply

with more stringent regulations, such as Total Maximum Daily Loads (TMDLs) and Special Protections for Areas of Special Biological Significant (ASBS), which are also required by the Municipal Permit.

The Storm Water Division, along with other City departments, is engaged in a number of activities that will cumulatively result in improved water quality. These activities include but are not limited to public education, employee training, water quality monitoring, storm water best management practice (BMP) development and enforcement within the City of San Diego's jurisdictional boundaries. In addition, the Storm Water Division provides technical expertise and guidance to all City departments to ensure implementation and compliance with the Municipal Permit. The Storm Water Division represents the City on Municipal Permit issues before the RWQCB. Furthermore, the Storm Water Division prepares and transmits an annual report of all City JRMP-related activities and is the responsible agent that certifies that the City complies with the Municipal Permit.

1.1 Regulatory Background

The 1972 Federal Water Pollution Control Act (Clean Water Act) (CWA) 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 pollution 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 CWA amendments, which established a framework for regulating non-point source pollutants.

Because of the intermittent, variable, and unpredictable nature of storm water runoff, the United States Environmental Protection Agency, which administers the CWA, reasoned that the problems caused by storm water discharges were better managed at the local level. This management occurs through non-point source controls, such as the use of BMPs, to prevent the pollutants from entering storm water and runoff. The State implements the CWA and the California Porter-Cologne Water Quality Control Act through its agency, the State Water Resources Control Board (SWRCB), which uses a system of regional entities (the RWQCBs) to implement these laws.

The Municipal Permit, originally issued in 1990 by the RWQCB, has been significantly revised multiple times since its inception. In 2008, the City of San Diego updated its Jurisdictional Urban Runoff Management Plan (JURMP) document as required by Order No.

R9-2007-0001. An updated Municipal Permit was adopted on May 8, 2013, then amended on February 11, 2015 and again on November 18th, 2015, by the RWQCB. The 2013 Municipal Permit requires the 18 municipalities in San Diego County, the County of San Diego, the San Diego County Regional Airport Authority, and the San Diego Unified Port District (Copermittees) to update their JURMPs. The 2013 Municipal Permit also replaced all references to "urban runoff" with "runoff" to emphasize the applicability of the Permit to all discharges to and from the Copermittees' storm drain systems, regardless of whether the source of a given discharge would generally be considered "urban." Accordingly, the name of the JURMP has also been changed to "Jurisdictional Runoff Management Plan".

This revised JRMP contains a comprehensive description of the City's storm water program, with updates to specific measures the City will implement or require to be implemented to comply with the Municipal Permit. This document is based on the most updated information available at the time this document was prepared. Each year, the City will submit a JRMP Annual Report to the RWQCB, and any changes to the City's JRMP will be noted in that document. Any program modifications will be for the advancement of the City's program and will comply with all regulations as presented in the Municipal Permit.

In 1993, the City of San Diego enacted the Storm Water Management and Discharge Control Ordinance (Storm Water Ordinance), codified in San Diego Municipal Code Sections 43.0301 to 43.0312). The City established the Storm Water Ordinance to ensure the health, safety, and general welfare of San Diegans by controlling non-storm water discharges. The Storm Water Ordinance was amended in 2001, 2008, and again in 2015 (see Appendix I, "Storm Water Ordinance").

In addition, the City Council adopted revisions to the City's Land Development Code, which includes Sections 142.0101 to 142.050 (Grading Regulations) and Sections 142.0201 to 142.0230 (Storm Water Runoff and Drainage Regulations). The California Coastal Commission approved the changes to the regulations on November 16, 2001. The objectives of the ordinance revisions are to control storm water pollution from sediments, erosion, and construction materials to the MEP during construction and during the use of developed sites. The City adopted "construction" and "post-construction" BMPs in the Storm Water Standards Manual in December 2002. The updated Storm Water Standards Manual, incorporating the new requirements in the Municipal Permit, went into effect on February 16, 2016 and is included in Appendix VII.

Currently, some of the Copermittees including the City are pursuing a subvention of funds from the State to pay for certain activities required by the 2007 Municipal Permit, including some of the activities in the JURMP. Nothing in this JRMP should be viewed as a waiver of those claims or as a waiver of the rights of the City to pursue a subvention of funds from the State to pay for certain activities required by the 2013 Municipal Permit, including the implementation of certain activities in this JRMP. In addition, several Copermittees,

including the City, have filed petitions with the SWRCB challenging some of the requirements of the 2013 Municipal Permit. Nothing in this JRMP should be viewed as a waiver of those claims. Because the SWRCB has not issued a stay of the 2013 Municipal Permit, Copermittees must comply with the Municipal Permit's requirements while the SWRCB process is pending.

1.2 Purpose and Objectives

The primary purpose of this document is to outline the strategies and processes the City will implement to reduce the discharge of pollutants from its storm drain system to the MEP in accordance with the Municipal Permit. To present the full picture of all the activities the City performs to improve water quality and meet the requirements of the Municipal Permit, the strategies identified in the Water Quality Improvement Plan (WQIP) for each of its Watershed Management Areas (WMAs) are also included in the JRMP, as stated in the previous section.

There are two types of strategies included in both the JRMP and the WQIPs:

1) JRMP strategies – These strategies describe the day-to-day operational activities and processes to improve water quality required by the Municipal Permit. . Both the Storm Water Division and other City departments and divisions are responsible for implementing JRMP strategies. The introduction to each section of this document identifies the JRMP strategies included in the WQIPs that fulfill the Municipal Permit requirements for that JRMP section, as well as the department(s) or division(s) responsible for implementing those strategies. Each City department or division is responsible for implementing the applicable JRMP strategies to meet Municipal Permit requirements and also perform the following:
    - Certify acceptance of this JRMP
    - Identify a staff member to coordinate with the Storm Water Division and oversee implementation of the department's or division's storm water policies and procedures
    - Comply with the minimum and activity-specific BMPs in the JRMP
    - Maintain records as required by the Municipal Permit
    - Provide staff training
    - Report the status of the JRMP implementation to the Storm Water Division
    - Annually certify compliance with all Municipal Permit requirements for which the department or division is responsible

2) Additional strategies – These strategies go above and beyond the City's JRMP strategies (day-to-day operational activities and processes) to meet water quality goals established in the WQIPs and are referred to as "enhanced" JRMP strategies and "optional" strategies. The Storm Water Division, not other City departments, is responsible for implementing these strategies and are identified at the end of each section, where applicable. Enhanced JRMP strategies are marked with an asterisk. WQIP Enhanced JRMP and optional strategies are identified at the end of each JRMP section, where applicable and enhanced JRMP strategies are marked with an asterisk.

The full list of JRMP, JRMP enhanced and optional strategies the City will implement is included as Appendix XX of the JRMP.

1.3 City Setting

The City of San Diego encompasses approximately 342 square miles within San Diego County. It is adjacent to both Mexico and the Pacific Ocean, and includes 70 miles of coastline. According to 2010 census data, the City is home to approximately 1.3 million residents.

1.3.1 Watersheds

The WMAs in which the City has jurisdiction, along with major water bodies in each, are listed in Table 1-1 below.

Table 1-1. City of San Diego Watershed Management Areas

Hydrologic Unit	WMA	Major Surface Water Bodies
San Dieguito (905.00)	San Dieguito River	• San Dieguito River • San Dieguito Lagoon • Pacific Ocean
Peñasquitos (906.00)	Peñasquitos	• Los Peñasquitos Lagoon • Pacific Ocean
	Mission Bay	• Mission Bay • Pacific Ocean • San Diego Marine Life Refuge Area of Special Biological Significance (ASBS)
San Diego (907.00)	San Diego River	• San Diego River • Pacific Ocean
Pueblo San Diego (908.00) Sweetwater (909.00) Otay (910.00)	San Diego Bay	• Chollas Creek • Sweetwater River • Otay River • San Diego Bay

Hydrologic Unit	WMA	Major Surface Water Bodies
		• Pacific Ocean
Tijuana (911.00)	Tijuana River	• Tijuana River • Tijuana Estuary • Pacific Ocean

1.3.2 MS4 Map

A map of the City's MS4 is included in Appendix III of this JRMP.

1.3.3 Environmentally Sensitive Areas

Environmentally sensitive areas (ESAs), as defined in the Municipal Permit, include but are not limited to the following:

- CWA Section 303(d) List of Water Quality Limited Segments
- Areas designated as Areas of Special Biological Significance by the SWRCB and the RWQCB
- State Water Quality Protected Areas
- Water bodies designated with the RARE beneficial use by the SWRCB and the San Diego RWQCB. The RARE beneficial use, as designated by the Water Quality Control Plan for the San Diego Basin, includes uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.
- Any other equivalent ESAs that have been identified by the Copermittees

A map of the ESAs within or adjacent to the City's jurisdiction is included as Appendix XVI.

1.4 Structure of the JRMP

As the blueprint for the City's actions to protect and improve water quality, the JRMP first describes the programs and activities that the Storm Water Division will implement to identify and abate sources of water quality pollution. Second, the JRMP describes the construction and post-construction BMPs and procedures the City implements on development projects. Third, the JRMP identifies the storm water BMPs implemented by various City departments to ensure the City will reduce pollutants in runoff and storm water to the MEP while conducting their daily activities. The sections of the JRMP are summarized below.

Section

1.0 Introduction

The introduction includes a general regulatory background leading up to the creation of this JRMP. City hydrologic setting, demographic information, and ESAs within the City are discussed in this section.

2.0 Program Organization and Legal Authority

This section identifies and describes the departments within the City that conduct and oversee JRMP-related activities and presents the City's storm water program organization.

3.0 Illicit Discharge Detection and Elimination

This section describes the processes by which illicit connections and illicit discharges are detected, investigated, and eliminated by the City. It also describes non-storm water discharge prohibitions and the City's approach to controlling and eliminating such discharges, including enforcement measures.

4.0 Development Planning

This section addresses how the City will reduce discharge of pollutants from development projects. Information regarding the City's General Plan, the City's newly updated Storm Water Standards Manual and related implementation methods are also included.

5.0 Construction

This section provides a description on the prioritization of the City's watershed-based inventory of construction sites within the City. Updates to the construction BMPs are also described. Other program implementation information, including construction and grading permit approval process, contract specifications, and inspection and enforcement procedures, is also included in this section.

6.0 Industrial and Commercial

This section provides a description on the prioritization of the City's watershed-based inventory of industrial and commercial facilities within the City, including mobile businesses known to operate in the City. This section describes the Minimum Industrial and Commercial BMPs that are required to be implemented at industrial and commercial facilities. This section also includes a discussion of facility inspection frequencies and procedures for inspections and enforcement.

7.0 Municipal

This section provides a description on the updated prioritization of the City's watershed-based inventory of municipal facilities. A description of pollution prevention methods and Minimum Municipal BMPs to be implemented at specific municipal facilities and during specific municipal activities is included in this section. This section also includes a discussion of municipal inspection frequencies and inspection and enforcement procedures.

Within this section, the City of San Diego includes the following sub-sections for its relevant municipal functions:

7.3.1 Airports

7.3.2 Buildings/Parking/Landscaping

7.3.3 City-Owned Leased Properties

7.3.4 Environmental Services

7.3.5 Fire-Rescue Activities

7.3.6 Non-Emergency Police Activities

7.3.7 Public Utilities – Wastewater Collection

7.3.8 Public Utilities – Wastewater Treatment

7.3.9 Public Utilities – Water System Operations, Construction, and Maintenance

7.3.10 Qualcomm Stadium

7.3.11 Recreational Lands and Facilities

7.3.12 Special Events

7.3.13 Storm Drain Conveyance System Operations and Maintenance

7.3.14 Streets

7.3.15 Fleet Services

7.3.16 Additional Water Quality Improvement Plan Strategies for the Storm Water Division

8.0 Residential Areas

This section provides a description of the newly updated residential oversight program and the oversight and enforcement methods the City staff will use to implement the program.

9.0 Public Education and Participation

This section describes the education programs and activities focused on improving water quality that will be used by the City including content, form, and frequency for each target audiences.

10.0 Fiscal Analysis

This section provides a summary of projected City funding needs to comply with Municipal Permit requirements. The Storm Water Division summary includes funding needs for JRMP activities, WQIP strategies, and flood risk management. The summary for other City departments and divisions only addresses JRMP activities because the other departments and divisions are not responsible for WQIP or flood risk management activities. The section also discusses anticipated funding sources and the City's approach to required annual fiscal analysis reporting.

11.0 Conclusions and Recommendations

This section describes conclusions and recommendations that were drawn from updates made to the JRMP.

12.0 References

2.0 Program Organization and Legal Authority

2.1 Introduction

As specified in Section E.1.a of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), the City of San Diego (City) establishes, maintains, and enforces adequate legal authority within its jurisdiction to control pollutant discharges into and from its municipal separate storm sewer system (MS4; hereafter, "storm drain system"). The City has established and updated local ordinances that have been incorporated into the City's Municipal Code, which provide legal authority for enforcing storm water requirements. The City's major provisions relating to storm water are:

- Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code Sections 43.0301 to 43.0312) (Storm Water Ordinance).
- Land Development Code, specifically Sections 129.0101 through 129.0120 (General Construction Permit Authority and Procedures); Sections 142.0101 to 142.0150 (Grading Regulations); and Sections 142.0201 to 142.0230 (Storm Water Runoff and Drainage Regulations).

Where violations of the Municipal Code are established, administrative and judicial enforcement procedures are available in the following sections of the San Diego Municipal Code:

- Storm Water Ordinance Enforcement Authority, Sections 43.0310 to 43.0312.
- Code Enforcement Judicial and Administrative Remedies, Sections 12.0101 to 12.1105.
- Recovery of Code Enforcement Penalties and Costs, Sections 13.0101 to 13.0425.
- Enforcement Authority for the Land Development Code, Sections 121.0201 to 121.0206.
- Violations of the Land Development Code and General Remedies, Sections 121.0301 to 121.0316.

As a municipal corporation, the City "generally shall have all municipal powers, functions, rights, privileges, and immunities . . . granted to municipal corporations by the Constitution and laws of the State of California," as stated in San Diego Charter Section 1. This includes the authority to enter into contracts. San Diego Municipal Code Section 22.3210 sets forth the City's procedures for entering into contracts with other public agencies.

This legal authority empowers the City, at a minimum, to do the following as required by Section E.1.a of the Municipal Permit:

1. Prohibit and eliminate all illicit discharges and illicit connections to the City's storm drain system.
2. Control the contribution of pollutants in discharges of runoff associated with industrial and construction activity to its storm drain system and control the quality of runoff from industrial and construction sites, including industrial and construction sites which have coverage under the State Water Resources Control Board (SWRCB) Industrial General Permit, Order No. 2014-0057-DWQ or SWRCB Construction General Permit, Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ, as well as to those sites which do not.
3. Control the discharge of spills, dumping, or disposal of materials other than storm water into the storm drain system. Section 3.0 of this document provides more information on discharge prohibitions.
4. Control the contribution of pollutants from one portion of the storm drain system to another portion of the storm drain system through interagency agreements among the 18 municipalities in San Diego County, the County of San Diego, the San Diego County Regional Airport Authority, and the San Diego Unified Port District.
5. Control the contribution of pollutants from one portion of the storm drain system to the portion of the storm drain system within the City's jurisdiction by coordinating and cooperating with other owners of the storm drain system such as the California Department of Transportation, the United States federal government, or sovereign Native American Tribes through interagency agreements, where possible.
6. Require compliance with conditions in City ordinances, permits, contracts, orders, or other similar means to hold dischargers to the storm drain system accountable for their contributions of pollutants and flows.
7. Require the use of best management practices (BMPs) to prevent or reduce the discharge of pollutants in storm water from the City's storm drain system to the maximum extent practicable (MEP).
8. Require documentation on the effectiveness of BMPs implemented to prevent or reduce the discharge of pollutants in storm water from the City's storm drain system to the MEP.
9. Utilize enforcement mechanisms to require compliance with City ordinances, permits, contracts, order, or similar means. The City's Enforcement Response Plan is included in Appendix XIII.

10. Carry out all inspection, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with City ordinances, permits, contracts, order, or similar means and with the requirements of the Municipal Permit, including the prohibition of illicit discharges and connections to the storm drain system, which includes the authority to enter, monitor, inspect, take measurements, review and copy records, and require regular reports from industrial facilities, including construction sites, discharging to the City's storm drain system.

The City's Storm Water Ordinance also incorporates, by reference, the City's updated minimum BMP requirements that are applicable to private businesses and residents. Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources are included in Appendix IX of this Jurisdictional Runoff Management Plan (JRMP).

2.2 Departmental Roles and Responsibilities

Personnel from various City departments are involved in implementing the City's storm water program. Figure 2-1 presents the current City of San Diego Organizational Chart. Within the City's structure, those departments that perform activities that may affect storm water quality have adopted BMPs and procedures. Some departments, such as Transportation & Storm Water (T&SW), Public Utilities, Public Works, Real Estate Assets, and Development Services, have multiple divisions with different roles for different portions of the City's storm water program. Additional organizational charts indicating the divisions within these departments with significant storm water program roles are presented as figures 2-2 through 2-4. Departments in Figure 2-2 are in the Infrastructure/Public Works group in Figure 2-1. Figure 2-3 provides a more detailed organizational chart for the Storm Water Division of the T&SW, which is the lead for the City's storm water program. Departments and divisions in Figure 2-4 are in the Internal Operations and Neighborhood Services groups in Figure 2-1.

The Storm Water Division is primarily responsible for many of the JRMP components and plays a supporting role in all components for which it does not have a primary role. The Storm Water Division also takes the lead in most interactions with the local regulatory agency, the RWQCB, and has led the City's efforts to update the City's six Water Quality Improvement Plans (WQIP) in which it has jurisdiction. Each WQIP identifies one or more of the highest priority water quality condition and corresponding numeric goals, strategies, and schedules. The JRMP incorporates all the WQIP strategies, as well as other activities and processes that the City will undertake to improve water quality in the region and to comply with the Municipal Permit. The Storm Water Division is responsible for the implementation of all applicable WQIP strategies. Most other departments have one section that presents their primary BMP responsibilities and administrative requirements, which do not include WQIP strategy implementation. Some departments other than T&SW

also have primary roles in more than one of the JRMP components. Details regarding the roles of different divisions within each department are provided within the individual JRMP sections where applicable.

Figure 2-1. Current City of San Diego Organizational Chart

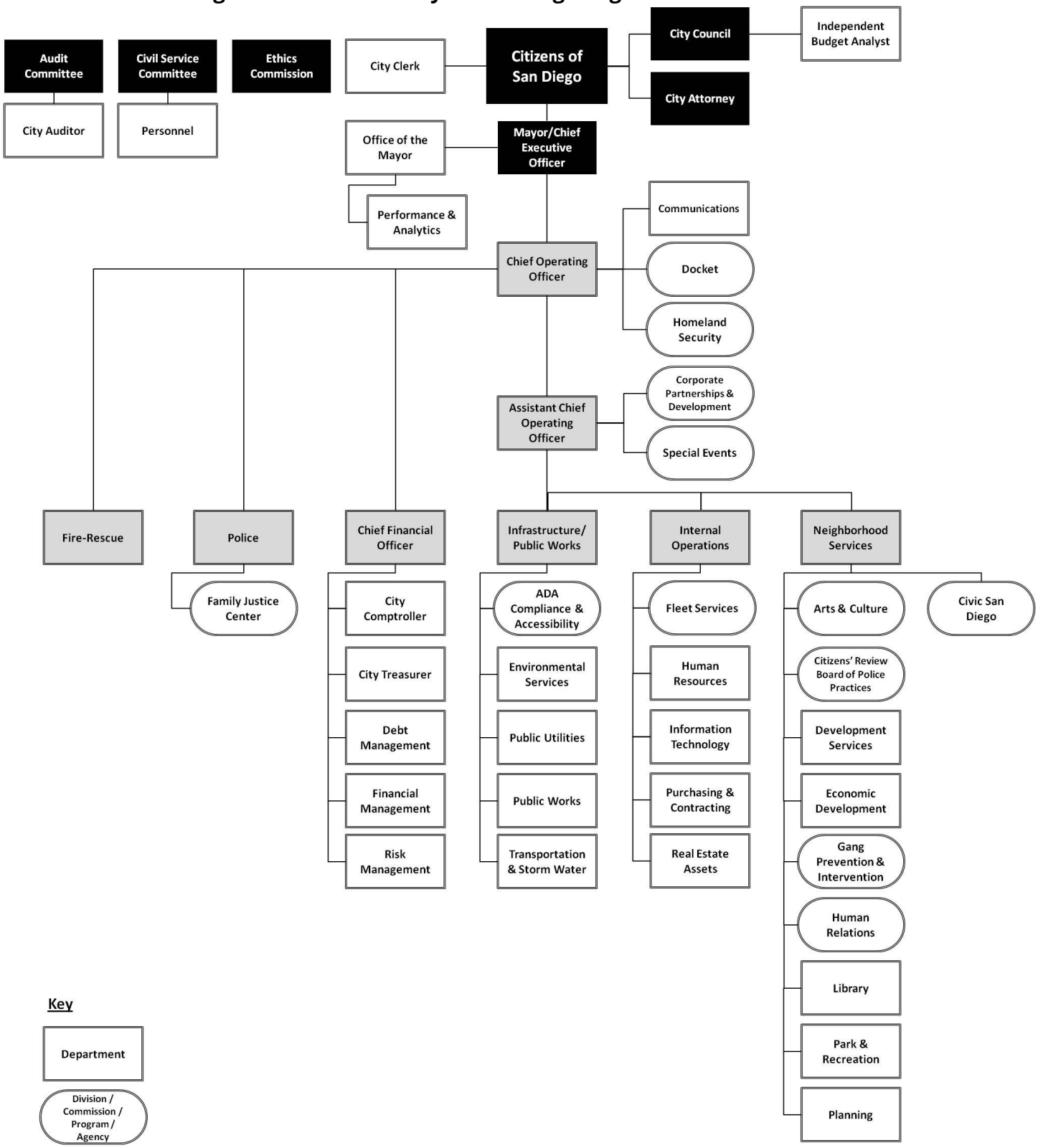


Figure 2-2. Summary of Divisions with Significant Storm Water Program Roles within the Infrastructure/Public Works Group

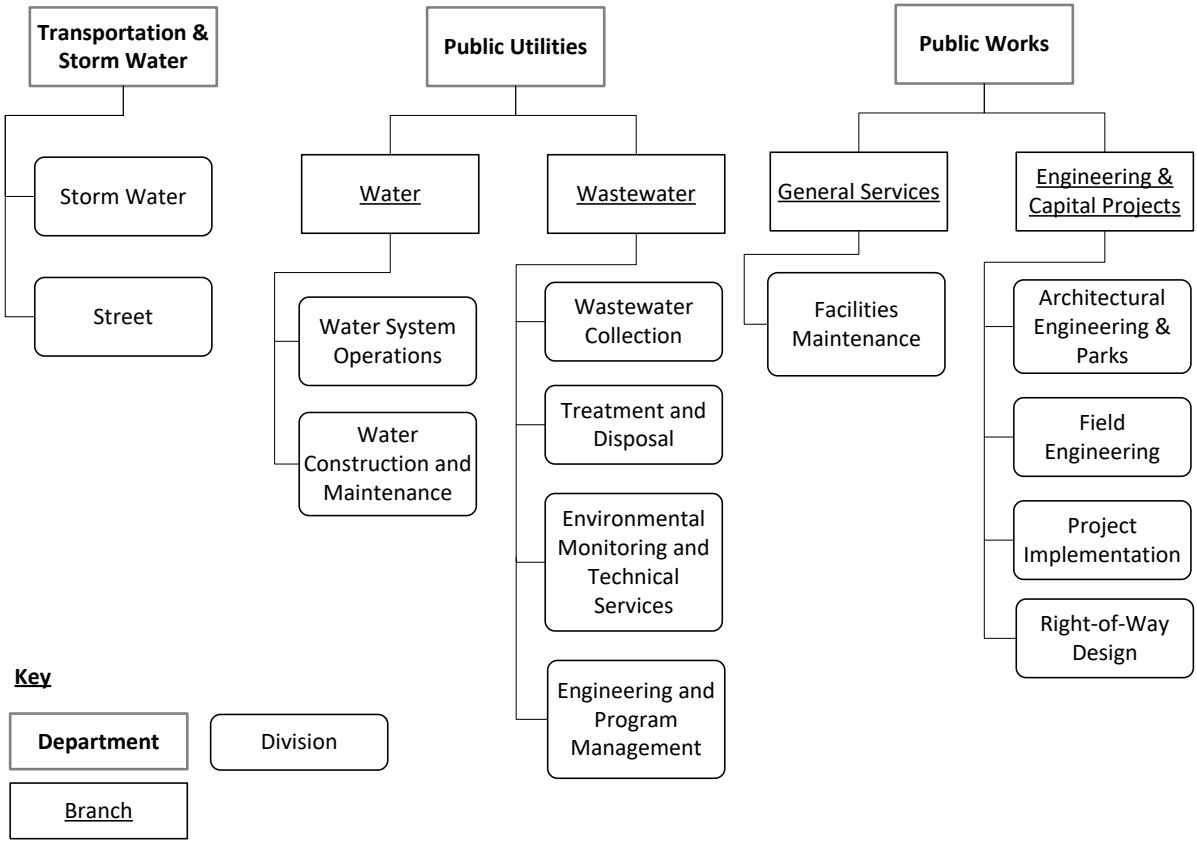


Figure 2-3. Storm Water Division Organizational Chart

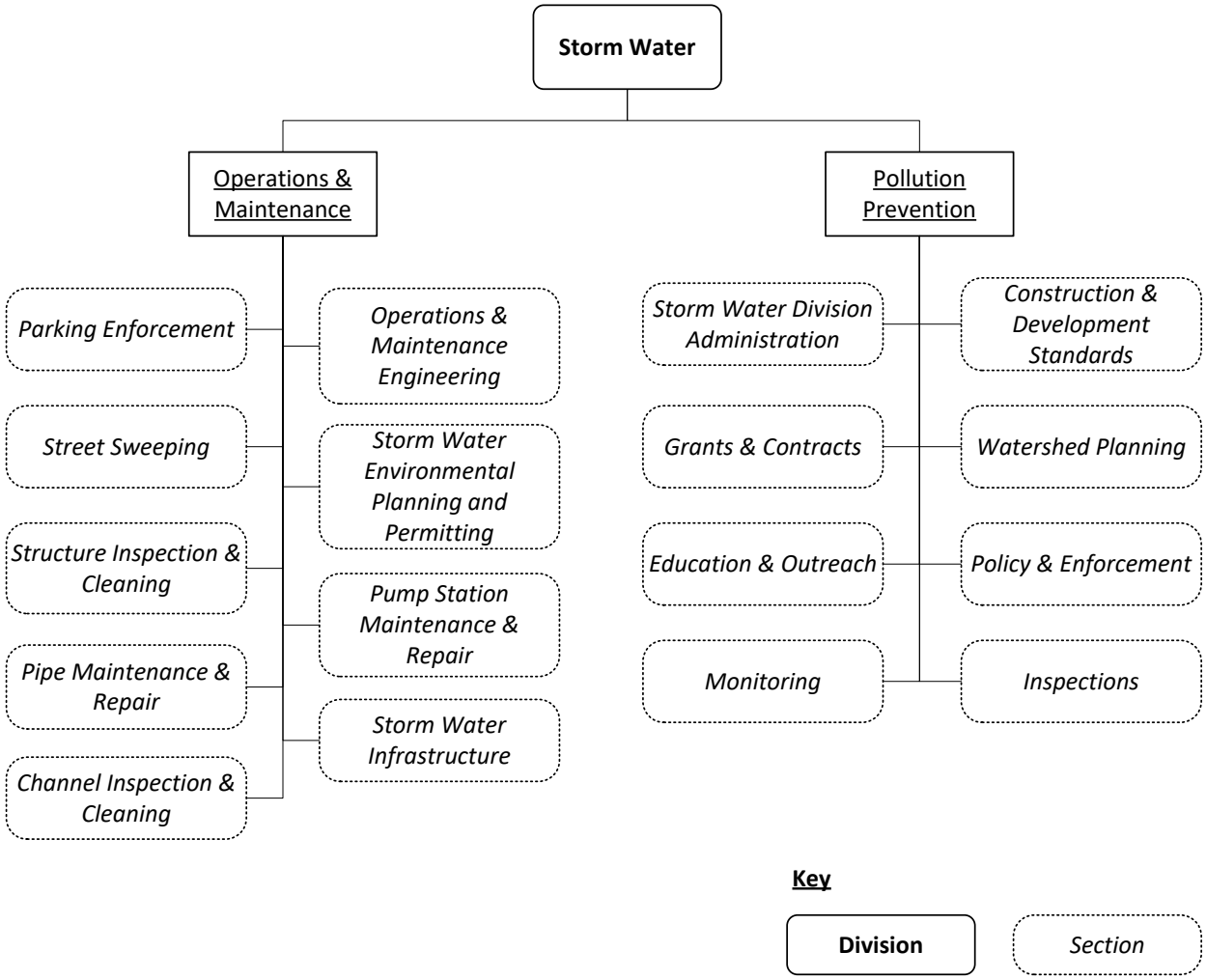
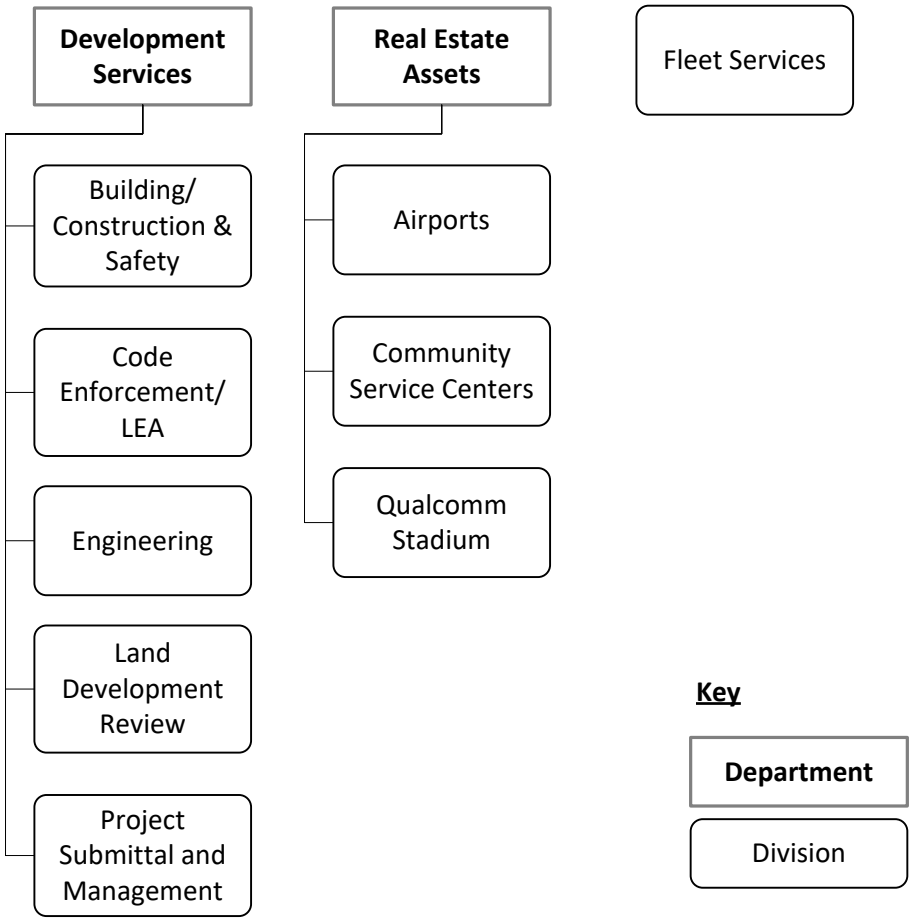


Figure 2-4. Summary of Divisions with Significant Storm Water Program Roles within the Internal Operations and Neighborhood Services Groups



2.3 JRMP Modifications

As program implementation progresses, the JRMP may need to be modified. Externally, JRMP modifications are submitted to the RWQCB as part of the Water Quality Improvement Plan (WQIP) Annual Reports. The revised JRMP is required to be made available to the public via the Regional Clearinghouse; the City also posts the most current version of its JRMP on the Storm Water Division website.

Internally, proposed modifications to the JRMP, including associated appendices, will be documented during the annual reporting process to ensure clear communication and transferability from one City staff person to another. Proposed modifications to the JRMP will be made in consultation with the affected departments, and must be approved by the Mayor or designee under San Diego Municipal Code Section 43.0310. Because there is no City Manager under the City's strong mayor form of governance, per the San Diego Charter

article XV, the Mayor or designee can give the authority to the City Manager under Charter Section 260. The Storm Water Division will record documentation of approval by the Mayor or designee. The updated JRMP will then be circulated to all City departments with storm water program responsibilities.

2.4 Certification of Legal Authority

The City of San Diego has the adequate legal authority to implement and enforce the requirements of the Municipal Permit as provided in the statement from the Chief Operating Officer. Enforcement, appeal, and administrative order/injunction processes are described in the Enforcement Response Plan (Appendix XIII) and in the Storm Water Ordinance (Appendix I).

3.0 Illicit Discharge Detection and Elimination

3.1 Introduction

This section is applicable to the Storm Water Division of the Transportation & Storm Water Department, the Wastewater Collection Division of the Public Utilities Department (PUD), and the Fire-Rescue Department. The goal of the Illicit Discharge Detection and Elimination (IDDE) Program is to actively seek and eliminate illicit connections and illicit discharges (IC/IDs) to the City of San Diego's (City) municipal separate storm sewer system (MS4; hereafter, "storm drain system"). This goal is achieved through implementation of required monitoring, enforcement, and public education programs. This section discusses illicit discharges, categories of non-storm water discharges that are allowed under certain conditions, and the City's procedures for IC/ID detection, prevention, response, and enforcement.

Responsible Department(s) or Division(s):

- Storm Water Division of the Transportation & Storm Water Department

Supporting Department(s) or Division(s):

- Wastewater Collection Division of the Public Utilities Department
- Water Conservation Team of the Public Utilities Department
- Fire-Rescue Department

Unauthorized discharges or connections can result in illicit discharges of pollutants to the City's storm drain system and ultimately receiving waters. The City's Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code Sections 43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I) defines IC/IDs as the following:

- ***Illicit connection*** means any man-made physical connection to the storm drain system that conveys an illicit discharge.
- ***Illicit discharge*** means any discharge to the storm drain system that is not composed entirely of storm water, except discharges allowed under a National Pollutant Discharge Elimination System (NPDES) permit and discharges conditionally allowed under the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as set forth in San Diego Municipal Code Section 43.0305. Illicit discharges include irrigation runoff discharged to the storm drain system.

In addition to the IDDE program, the City conducts other programs that result in the discovery of IC/IDs. An example of an existing program is the Dry Weather Major MS4 Outfall Discharge Monitoring Program (MS4 Outfall Monitoring Program) and industrial/commercial facility inspections (see Section 6.0, "Industrial and Commercial"). The Storm Water Division maintains a public hotline for the purpose of public reporting of IC/IDs to the storm drain system and is responsible for ensuring the abatement of IC/IDs. Beyond monitoring and enforcement, the City relies on its Storm Water Division's Public Education and Participation Program to reduce discharges by raising public awareness and encouraging behaviors that reduce the amount of pollutants released to the storm drain system (See Section 9.0, "Public Education and Participation").

The City's Jurisdictional Runoff Management Plan (JRMP) must meet the requirements of the Municipal Permit, as described in Table 3-1.

Table 3-1. Municipal Permit Requirements - IDDE

JRMP Section	Municipal Permit Section	Municipal Permit Requirement (Summary)
3.2	E.2.a., Attachment A	Address all non-storm water discharges as illicit discharges unless it is identified as a discharge authorized by a separate NPDES permit or as a conditionally allowed category of non-storm water discharges.
3.3	E.2.b.(2)	Utilize City personnel and contractors to assist in identifying and reporting IC/IDs during their daily activities.
3.3.1, 3.3.2	E.2.b.(3)	Promote, publicize, and facilitate public reporting of the presence of IC/IDs. Operate a public hotline capable of receiving reports in English and Spanish 24 hours per day and seven days a week. Designate email address for receiving electronic reports from the public and display on City's website and the Regional Clearinghouse.
3.3.2	E.2.b. (4)-(6)	Implement practices and procedures to prevent, respond to, contain, and clean up any spills that may discharge to the storm drain system, including the infiltration of seepage from sanitary sewers. Coordinate with upstream Copermittees and/or entities to prevent illicit discharges from upstream sources into the storm drain system within its jurisdiction.
3.3.3	D.2., E.2.c.	Conduct field screening of MS4 outfalls and other portions of its storm drain system within its jurisdiction to detect IC/IDs.
3.3.3.2	E.2.b.(1)	Maintain an updated map of its entire storm drain system and corresponding drainage areas and confirm the map's accuracy during field screening.
3.4, 3.5, 3.6	E.2.d.	Investigate and eliminate IC/IDs.
3.8	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

The JRMP activities described throughout the remainder of this chapter fulfill the requirements of the Municipal Permit listed in Table 3-1. These JRMP activities are also summarized and included as strategies in each of the City's six Water Quality Improvement Plans (WQIPs). Table 3-2 below identifies the applicable JRMP activities that have been

identified as WQIP strategies. These strategies are also included in Appendix XX of the JRMP.

Table 3-2. JRMP Strategies Identified in the WQIPs

Strategy ID	Strategy
CSD-JRMP-21	Review policies and procedures to ensure discharges from swimming pools meet permit requirements.
CSD-JRMP-40	Implement Illicit Discharge, Detection, and Elimination (IDDE) Program per the JRMP. Requirements include: maintaining an MS4 map, using municipal personnel and contractors to identify and report illicit discharges, maintaining a hotline for public reporting of illicit discharges, monitoring MS4 outfalls, and investigating and addressing any illicit discharges.
CSD-JRMP-41	Implement Illicit Discharge, Detection, and Elimination (IDDE) Program per the JRMP. Requirements include: maintaining an MS4 map, using municipal personnel and contractors to identify and report illicit discharges, maintaining a hotline for public reporting of illicit discharges, monitoring MS4 outfalls, and investigating and addressing any illicit discharges.
CSD-JRMP-54	Continue to implement escalating enforcement responses to compel compliance with statutes, ordinances, permits, contracts, orders, and other requirements for IDDE, development planning, construction management, and existing development in the Storm Water Code Enforcement Unit's Standard Operating Procedures (SOPs) - Enforcement Response Plan.

Additional strategies have been identified to help meet the water quality goals in the WQIPs; those strategies are identified in Section 3.9. These strategies will be managed by the Storm Water Division and are considered enhancements to the IDDE Program. The full list of WQIP strategies is included as Appendix XX of the JRMP.

3.2 Non-Storm Water Discharges

Non-storm water discharges to the storm drain system are prohibited unless the discharge has been authorized by a separate NPDES permit or is conditionally allowed by the Municipal Permit. Some categories of non-storm water discharges are allowed on the condition that they are addressed in accordance with the requirements of the Municipal Code and the Municipal Permit and are discussed below.

The City will periodically review and evaluate conditionally allowed discharges to determine whether specified categories may be significant sources of pollutants to receiving waters. Where a category of non-storm water discharge is determined to be a significant source of

pollutants, the City will consider amending the Municipal Code to prohibit that category of discharge or require BMPs. See Appendix IX for a list of the City's Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources and Appendix XIII for the Enforcement Response Plan, which details enforcement measures.

3.2.1 Prohibited Discharges

Irrigation runoff that reaches the City's storm drain system is prohibited by the Municipal Permit and the San Diego Municipal Code. Under the previous Municipal Permit, irrigation runoff was allowed unless it was shown to be a source of pollutants. Irrigation runoff includes intended or unintended overspray and excessive application of irrigation water from sprinklers or hosing activities. Other examples of prohibited discharges include wash water from power washing, and hazardous materials, such as automotive fluids, that enter the City's storm drain system.

The following two groups of non-storm water discharges are not allowed unless they have coverage under an NPDES permit, as required by Section E.2.a.(1)-(2) of the Municipal Permit.

1. The following discharges of non-storm water to the storm drain system will be considered illicit discharges unless the discharge has coverage under NPDES Permit No. CAG919001 (Order No. R9-2007-0034, or subsequent order) for discharges to San Diego Bay, or NPDES Permit No. CAG919002 (Order No. R9-2008-0002, or subsequent order) for discharges to surface waters other than San Diego Bay:
    a. Uncontaminated pumped ground water.
    b. Discharges from foundation drains (if not covered under an NPDES permit, the discharge is only prohibited if the system is designed to be located at or below the groundwater table to actively or passively extract groundwater during any part of the year).
    c. Water from crawl space pumps.
    d. Water from footing drains (if not covered under an NPDES permit, the discharge is only prohibited if the system is designed to be located at or below the groundwater table to actively or passively extract groundwater during any part of the year).

Applications for the NPDES Permit No. CAG919001 and NPDES Permit No. CAG919002 can be found online at www.waterboards.ca.gov/sandiego. Any parties discharging the above non-storm water discharges must submit a Notice of Intent to the State Water Resources Control Board (SWRCB) along with an initial sampling and monitoring report, a project map, and an application fee.

2. Discharges of non-storm water from water line flushing and water main breaks to the storm drain system will be considered illicit discharges unless the discharge has coverage under NPDES Permit No. CAG679001 (Order No. R9-2010-0003 or subsequent order).
    a. This includes water line flushing and water main break discharges from water purveyors issued a water supply permit by the California Dept. of Public Health or federal military installations.
    b. Discharges from recycled or reclaimed water lines to the storm drain system will also be addressed as illicit discharges unless the discharge has coverage under a separate NPDES permit.

Section E.2.d.(3)(e) of the Municipal Permit requires that if the City is unable to identify and document the source of a recurring non-storm water discharge to or from the storm drain system, then the City must address the discharge as an illicit discharge and update its JRMP as needed to address the common and suspected sources of the non-storm water discharge within its jurisdiction.

In accordance with Attachment A ("Discharge Prohibitions and Special Protections") of the Permit, additional prohibited discharges include the following:

- Discharges of recycled water to lakes or reservoirs used for municipal water supply or to inland surface water tributaries are prohibited, unless the RWQCB issues a NPDES permit authorizing such a discharge; the proposed discharge has been approved by the State Department of Health Services and the operating agency of the impacted reservoir; and the discharger has an approved fail-safe long-term disposal alternative.
- The unauthorized discharge of treated or untreated sewage to receiving waters is prohibited. All discharges of treated or untreated sewage from vessels to Mission Bay or other small boat harbors are prohibited.

In accordance with Attachment A of the Permit, additional restrictions for discharges from areas draining to an Area of Special Biological Significance (ASBS) include the following. A map of areas within the City of San Diego draining to an ASBS is included as Appendix X.

- Existing storm water discharges into ASBS are allowed only if the discharges are authorized by an NPDES permit issued by the RWQCB or the SWRCB and meet the following requirements:
    - Are essential for flood control or slope stability, including roof, landscape, road, and parking lot drainage.
    - Are designed to prevent soil erosion.

  - Occur only during wet weather.
  - Are composed of only storm water runoff.
  - Do not alter natural ocean water quality in an ASBS.
- The discharge does not contain trash.
- Only discharges from existing storm water outfalls are allowed. Any proposed or new storm water runoff discharge shall be routed to existing storm water discharge outfalls and shall not result in any new contribution of waste to an ASBS (i.e., no additional pollutant loading). "Existing storm water outfalls" are those that were constructed or under construction prior to January 1, 2005. "New contribution of waste" is defined as any addition of waste beyond what would have occurred as of January 1, 2005. A change to an existing storm water outfall, in terms of re-location or alteration, in order to comply with these special conditions, is allowed and does not constitute a new discharge.
- Non-storm water discharges are prohibited except as provided below.
  - Discharges that are essential for emergency response purposes, structural stability, slope stability or occur naturally such as:
    - Discharges associated with emergency firefighting operations.
    - Foundation and footing drains.
    - Water from crawl space or basement pumps.
    - Hillside dewatering.
    - Naturally occurring groundwater seepage via a storm drain.
    - Non-anthropogenic flows from a naturally occurring stream via a culvert or storm drain, as long as there are no contributions of anthropogenic runoff.
  - An NPDES permitting authority may authorize non-storm water discharges to an storm drain system with a direct discharge to an ASBS only to the extent the NPDES permitting authority finds that the discharge does not alter natural ocean water quality in the ASBS.
  - Authorized non-storm water discharges shall not cause or contribute to a violation of the water quality objectives in Chapter II of the Ocean Plan nor alter natural ocean water quality in an ASBS.

3.2.2 Conditionally Allowed Discharges

Conditionally allowed non-storm water discharges are described in Section E.2.a.(3)-(4) of the Municipal Permit and include the following:

- Discharges of non-storm water to the storm drain system from the following categories are allowed unless the City or the RWQCB identifies the discharge as a source of pollutants to receiving waters:
    - Diverted stream flows.
    - Rising ground waters.
    - Uncontaminated ground water infiltration to storm drain system.
    - Springs.
    - Flows from riparian habitats and wetlands.
    - Discharges from potable water sources.
    - Discharges from foundation drains (only applies if the system is designed to be located above the groundwater table at all times of year and is only expected to discharge non-storm water under unusual circumstances).
    - Discharges from footing drains (only applies if the system is designed to be located above the groundwater table at all times of year and is only expected to discharge non-storm water under unusual circumstances).
- Discharges of non-storm water to the storm drain system from the following categories are allowed on the condition that the discharge is addressed by the following BMPs, which are also discussed in the City's Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources in Appendix IX; otherwise, they will be addressed as illicit discharges.
    - Air conditioning condensation

      Air conditioning condensation discharges have been identified as a source of pollutants, including copper, based on monitoring completed by the City, and are prohibited from entering the City's storm drain system unless the following BMPs are followed in order.

        - Direct air conditioning condensation to the sanitary sewer, if allowed. Contact the Development Services Department at (619) 446-5000 to obtain a building permit to direct the condensation to the sanitary sewer system.
        - Direct air conditioning condensation discharges to onsite landscaped or pervious area to infiltrate or evaporate, without resulting in erosion

or runoff to the storm drain system or any adjacent property. Directing discharges to landscaping close to a building foundation is not recommended.

- If the above BMP options are not feasible AND the discharge does not contain pollutants exceeding the California Toxics Rule (CTR), air conditioning condensation may enter the City storm drain system. Condensation must be proven to contain no pollutants that contribute to CTR water quality exceedances with monitoring conducted using Environmental Protection Agency standard protocols.

- Individual residential vehicle washing

  Water associated with washing shall be controlled to minimize entrance to City storm drains, curbs and gutters, or any other part of the City's storm drain system. BMPs are always required when washing vehicles, boats and other equipment in residential areas.

  When washing vehicles, boats, or other equipment in an area that may reach the storm drain system, the following BMPs must be employed as applicable to the site.

  - Minimize the quantity of water and detergent used when washing by using a control nozzle or bucket.
  - If only biodegradable soaps and uncontaminated water are used, wash water may be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. This can be accomplished by washing the vehicle on a landscaped area or using a berm to direct wash water to a landscaped area.
  - Drains that connect to the storm drain system in wash areas shall be protected to avoid discharges. Designated washing areas may consist of a container, a berm, or a liner to collect and contain liquids and prevent runoff.
  - Any contained wash water shall be disposed of properly. Examples for capturing and disposing of wash water include collecting and capturing using a wet vacuum, mop, absorbents, or equivalent or discharging to a landscaped area. Allowing residual water to evaporate is an acceptable method of disposal only if all standing water has been removed and properly disposed of to avoid tracking

offsite. Any remaining residue on pavement or other impervious areas shall be removed to prevent future pollutant discharges. Captured wash water may be disposed through the sanitary sewer system with PUD's approval. Contact the PUD at (858) 654-4100 for approval of any discharges to the sanitary sewer system.

- Dispose of wash water containing oil, paint, or other hazardous waste in accordance with applicable regulations.
- If all applicable vehicle washing BMPs are employed and there is no landscaped area to direct wash water to, some wash water may be allowed to enter the storm drain system.

- Dechlorinated swimming pool/spa discharges
  - Discharge swimming pools, spas, reflective pools, ponds, and fountain water either by:

    (1) discharging water to the sanitary sewer system; or

    (2) slowly draining water to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.
  - Discharge to the storm drain system is only permissible if the surface flow path is cleared of trash, debris, and sediment, the water is dechlorinated, has a pH in the 7-8 range, is within the ambient temperature, has no algae, algaecide, or suspended solids, and is not saline.
  - Dispose of filter backwash water only to the sanitary sewer system, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.
  - Discharge of saline swimming pool water to City storm drains, curb gutters, or any other part of the City's storm drain system is prohibited unless the saline water can be discharged through a pipe or concrete channel directly to a naturally saline water body (e.g., the Pacific Ocean).
  - Prior to discharging large quantities of water to the sanitary sewer system, contact the PUD at (858) 654-4100 to determine whether the discharge is allowed and applicable permitting requirements.

3.2.3 Firefighting Discharges

In accordance with Section E.2.a.(5) of the Municipal Permit, non-storm water discharged to the storm drain system as a result of emergency and non-emergency firefighting activities is conditionally allowed unless the City or the RWQCB identifies the discharge as a significant source of pollutants to receiving waters. Firefighting discharges to the storm drain system not identified as a significant source of pollutants to receiving waters must be addressed, as follows, and in accordance with the Minimum Municipal BMPs in Section 7.3.5 and Appendix IX:

- Non-emergency firefighting discharges
    - Building fire suppression system maintenance discharges (e.g. sprinkler line flushing) shall be addressed by BMPs to prevent the discharge of pollutants to the storm drain system.
    - Non-emergency firefighting discharges (i.e., discharges from controlled or practice blazes, firefighting training, and maintenance activities not associated with building fire suppression systems) are subject to the Minimum Municipal BMPs described in Section 7.3.5 of this JRMP in order to reduce or eliminate pollutants in such discharges to the storm drain system.
- Emergency firefighting discharges
    - During emergency situations, priority of efforts is directed toward life, property, and the environment (in descending order). The Minimum Municipal BMPs listed in Section 7.3.5 are encouraged to prevent pollutants from entering the storm drain system, but shall not interfere with immediate emergency response operations or impact public health and safety.

3.3 IC/ID Prevention and Detection

The main objective of the City's IDDE program is to prevent, actively seek, and eliminate IC/IDs to the storm drain system. Detection and prevention of IC/IDs is achieved primarily by:

1. Operating a public complaint phone hotline and website.
2. Conducting dry weather field screening of major MS4 outfalls.
3. Inspecting industrial/commercial and municipal facilities, construction sites, and residential areas (see sections 5.0, 6.0, 7.0, and 8.0).
4. Maintaining the storm drain system and sewer system (see Section 7.0).
5. Educating the local community (see Section 9.0).

This section discusses specifically how the City's complaint hotline and MS4 outfall monitoring are used to detect non-storm water discharges.

3.3.1 Public Reporting of IC/IDs

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 IC/IDs 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 Storm Water Division Hotline (619-235-1000) and email (SWPPP@sandiego.gov). IC/IDs can also be reported using the "Get It Done" website (https://www.sandiego.gov/get-it-done) or the mobile app. Other public comments are also received via the "Think Blue" website (www.ThinkBlue.org) and the County of San Diego's Storm Water Hotline (1-888-846-0800) and email (watersheds@sdcounty.ca.gov).

The Water Conservation team of the Public Utilities Department and Storm Water Code Enforcement team of the Storm Water Department coordinate enforcement activities by internally referring cases to other Code Enforcement sections. Many cases originate from reporting via "Get It Done." Over-irrigation complaints with runoff reaching the curb and gutter are referred to the Storm Water Code Enforcement team. Over-irrigation that reaches the sidewalk or driveway but does not leave the property is referred to the Water Conservation enforcement team. The City uses its municipal personnel to assist in identifying and reporting IC/IDs during their daily activities. Details of municipal staff training can be found in Section 7.0, "Municipal".

Once a complaint is received by the Storm Water Division Hotline, it is logged into an electronic database for documentation and tracking purposes. The complaint is then forwarded to Storm Water Division Code Enforcement staff for investigation. Investigations are initiated for all complaints with details suggesting an actual or potential discharge to the storm drain system or receiving waters. If investigators find evidence of a violation with the potential to release pollutants or an actual IC/ID, every effort is made to find the responsible party and inform them of the complaint or issue a Notice of Violation (NOV). Parties found to be responsible for a violation or an IC/ID are required to clean up or remove pollutants to the maximum extent practicable (MEP). Any refusal by the responsible party to perform clean up of a violation or discharge will be handled by Code Enforcement staff and appropriate enforcement actions will be taken.

The City validates, investigates, inspects, and appropriately follows-up on IC/IDs that are reported or detected, to identify the source(s) of the discharge. Complaints are typically validated in the field. IC/IDs potentially harming human health are placed at the highest priority, with IC/IDs potentially threatening aquatic health or reaching a receiving water body as the next most important priority for investigation. If the reported IC/ID is identified, voluntary compliance and enforcement mechanisms are implemented to immediately eliminate the IC/ID once the source has been identified and education is

provided to help prevent future IC/IDs (see Section 3.6 for additional detail on enforcement action).

3.3.2 Spill Reporting, Response, and Prevention

The City implements spill prevention, response, and reporting mechanisms to prevent, respond to, contain, and clean-up all sewage and other harmful spills that discharge to, or may have the potential to discharge to it's the City's storm drain system. The City coordinates with spill response teams to prevent entry of spills into the storm drain system and to prevent the contamination of surface water, ground water, and soil to the MEP. If necessary, the City will coordinate with upstream and downstream jurisdictions and/or agencies to prevent spills and illicit discharges into or from the City's storm drain system. This section is intended to provide an overview of the City's general spill prevention, response, and reporting actions. The City's Sanitary Sewer Management Plan and hazardous materials response plan shall be referenced first when responding to sewer and hazardous materials spills, respectively.

The Municipal Permit requires that sewage discharges that are caused by blockages or other problems within a privately owned lateral or failing septic systems be dealt with appropriately. If a spill from a private sewer lateral is not contained and no action is taken by the responsible party to repair the lateral, the City will take necessary action to contain the sewage spill, repair the lateral, and bill the responsible party. The City's Code Enforcement staff handle citations and the PUD respond to all private or public sewage spills and mitigate the clean-up on the public right of way. For private spills, PUD will seek cost recovery through Risk Management for labor and equipment incurred in cleaning up the spill on public right of way. Costs for pollution detection and abatement must be paid in full by the discharger, in addition to any other penalties, or a lien may be filed against the property in accordance with the abatement procedure.

If any spill or discharge is determined to pose a threat to human health or the environment, the incident is reported to the RWQCB in accordance with Section 1.l.(6) of Attachment B of the Municipal Permit. If any doubt exists, staff shall refer to the chemical release assessment form and 304 form for hazardous materials spill reporting guidelines (Appendix XII).

If the involvement of City staff is necessary, the nature of the spill dictates which City department will take action to control, contain, and clean-up the spill or discharged materials, which is summarized in Table 3-3. Corrective actions are implemented to the extent that they are applicable to the discharge and are discussed in further in Section 3.5.

Table 3-3. Responsible Parties for Spill Abatement and Cleanup

Response Action	Public Spill	Private Spill
Sewage		
Abate/Mitigate	PUD Wastewater Collection Division	Responsible party or if unknown, notify PUD Wastewater Collection Division staff
Clean off surface	PUD Wastewater Collection Division	Responsible party or if unknown, notify PUD Wastewater Collection Division staff
Clean out storm drain system	PUD Wastewater Collection Division	Responsible party or if unknown, notify PUD Wastewater Collection Division staff
Hazardous Material / Unknown		
Abate/Mitigate	Fire Department	Fire Department
Clean off surface and disposal	Storm Water Division (via licensed Hazardous Waste Hauler)	Responsible private party, or if unknown, Storm Water Division (via licensed Hazardous Waste Hauler)
Clean out storm drain system	Storm Water Division (via licensed Hazardous Waste Hauler)	Responsible private party, or if unknown, Storm Water Division (via licensed Hazardous Waste Hauler)
Other		
Abate/Mitigate	Responsible department (staff or via private contractor)	Responsible party if known, if unknown, Storm Water Division
Clean off surface	Responsible department (via Storm Water Division or private contractor)	Responsible private party, or if unknown, Storm Water Division
Clean out storm drain system	Responsible department (via Storm Water Division or private contractor)	Responsible private party, or if unknown, Storm Water Division

3.3.3 MS4 Outfall Monitoring

In 2013, the City began routine visual monitoring of major MS4 outfalls to detect non-storm water discharges from the City's storm drain system to receiving water bodies, in accordance with the updated monitoring requirements of the Municipal Permit. A "major outfall" is defined as an outfall that is 36 inches in diameter or drains an industrial area and is at least 12 inches in diameter and discharges to a receiving water body. Monitoring is performed at each applicable Watershed Management Area (WMA) during dry weather to detect non-storm water and IC/IDs to its storm drain system. Table 3-4 summarizes the WMAs spanning the City of San Diego.

Table 3-4. City of San Diego Watershed Management Areas

Hydrologic Unit	WMA	Major Surface Water Bodies
San Dieguito (905.00)	San Dieguito River	• San Dieguito River • San Dieguito Lagoon • Pacific Ocean
Peñasquitos (906.00)	Peñasquitos	• Los Peñasquitos Lagoon • Pacific Ocean
	Mission Bay	• Mission Bay • Pacific Ocean • San Diego Marine Life Refuge ASBS
San Diego (907.00)	San Diego River	• San Diego River • Pacific Ocean
Pueblo San Diego (908.00) Sweetwater (909.00) Otay (910.00)	San Diego Bay	• Sweetwater River • Otay River • San Diego Bay • Pacific Ocean
Tijuana (911.00)	Tijuana River	• Tijuana River • Tijuana Estuary • Pacific Ocean

The 2013 Municipal Permit emphasizes the identification and elimination of flow from the City's storm drain system instead of specific storm water pollutants. By working towards eliminating or reducing dry weather flows, the City is able to concentrate on reducing and eliminating a wide range of pollutants that may be transported to receiving waters by non-storm water discharges to the storm drain system.

The City has implemented procedures to routinely investigate and inspect segments of its storm drain system that have a reasonable potential of receiving, containing, or discharging pollutants due to IC/IDs or other non-storm water sources as discussed in sections 3.3 and 3.4.

In accordance with Permit Section E.2.d (1), non-storm water discharges found during field work are prioritized for investigation by City staff, recorded on the MS4 outfall monitoring datasheet if needed, included in Appendix XVIII, and reported to Storm Water Division Code Enforcement staff for appropriate enforcement action as discussed in Section 3.6. Detailed procedures for discharge investigations and the prioritization of investigations and discharges are discussed in Section 3.4.

3.3.3.1 ASBS Monitoring

Additional monitoring is performed in the areas draining to the La Jolla ASBS as described in the La Jolla ASBS Compliance Plan, which can be accessed at the City's website

(www.sandiego.gov). The ASBS Compliance Plan requires that all outfalls within the ASBS have a NPDES permit. If City staff determines that a private outfall in the ASBS does not have a NPDES permit, staff will notify the RWQCB for them to take the appropriate action.

3.3.3.2 MS4 Map

As part of the City's JRMP and MS4 Outfall Monitoring Program, the City has updated and continues to maintain a map (Appendix III) that includes the following information:

- All storm drain system segments owned, operated, and maintained by the City, including MS4 outfall monitoring locations and drainage basins.
- All known locations of inlets that discharge and/or collect runoff into the City's storm drain system.
- All known locations of connections with other storm drain systems not owned or operated by the City (e.g. storm drain systems operated by the California Department of Transportation).
- All known locations of MS4 outfalls and private outfalls that discharge runoff collected from areas within the City's jurisdiction.
- All segments of receiving waters within the City's jurisdiction that receive and convey runoff discharged from the City's MS4 outfalls.
- Locations of the inventoried major MS4 outfalls within the City's jurisdiction, pursuant to Section D.2.a.(1) of the Municipal Permit.
- Locations of the non-storm water persistent flow MS4 outfall monitoring stations, identified pursuant to Section D.2.a.(1) of the Municipal Permit.

The MS4 map in Appendix III displays the City's current storm drain system data, which includes known pipes, channels, inlets, outlets, and other types of storm drain system conveyances and structures. The City's GIS storm drain system data includes both the City's storm drain infrastructure and known storm drain infrastructure belonging to other agencies or private parties that connects into the City's storm drain system. In accordance with Section E.2 of the Municipal Permit, each watershed within the City's jurisdiction contains at least one monitoring station. The status of major MS4 outfalls marked as having persistent flow, and the subset of those outfalls selected for additional analytical monitoring, will change in the future as the City collects more data from outfall monitoring and as sources of flow are eliminated. More details about the additional analytical monitoring performed at persistent flow outfalls, including which outfalls have been selected for monitoring, is included in the WQIPs. Updates will be provided through the WQIP annual reporting process.

If field staff note inaccuracies in the map during field screening, the inaccuracies will be reported to the appropriate City staff so that updates can be made. The need for updates to the map will be assessed at least annually, and at that time, updates will be made where necessary. The Geographic Information System (GIS) files used in developing the City's MS4 map will be made available to RWQCB staff upon request.

3.3.3.3 Routine MS4 Outfall Monitoring and Trash Assessment Procedures

During each site visit, an MS4 outfall monitoring datasheet (Appendix XVIII) is completed. The steps involved in obtaining the information to complete the datasheet are listed below.

Site Location and Documentation

The first task in conducting a routine site visit is locating the site. This is achieved by using GPS coordinates and the location description provided by the major outfall monitoring site inventory. A hand-held GPS device is used in the field to verify or update coordinates. Once the site has been located and verified, photos are taken to document the condition of the site. Photos are taken of the site and are taken such that they sufficiently display any water present and notable landmarks when possible.

Atmospheric Conditions

Weather conditions and rainfall information are recorded on the field datasheet. It is important to record the nature of the tide (i.e., incoming, outgoing, high) and its height if the outfall may be tidally influenced. Since monitoring is only permitted to be conducted during dry weather, it is important to document that the monitoring is being completed during dry weather conditions: >72 hours since the last rain, or <72 hours since the last rain and ≤0.1 inches of precipitation. If neither of those conditions are met, then dry weather monitoring cannot be conducted. The field team shall then stop work until dry weather conditions apply again.

Accessibility, Structural Condition and Signs of Illicit Activity

This section of the datasheet requires the observer to identify if the site is safe to access, overgrown with vegetation, within critical habitat, evidence of an illicit connection or illegal dumping. Additional information recorded in this section of the datasheet includes the following.

> ***Sample Point Condition –*** "Damaged" means that the outfall structure is cracked, has partially collapsed, or is otherwise in need of repair. "Scour Pond" means an unpaved area just downstream of the outfall has been eroded by outfall discharges such that a depression that allows water to collect and pond has formed. Scour ponds may be sources of bacteria. "Erosion" means there is evidence of erosion at or immediately downstream of an outfall that could result in a blockage or could potentially contribute to water quality issues. "Blockage" means the flow path

through the outfall is significantly obstructed. Outfalls to which none of the above apply and that are in good structural condition are marked as "Normal".

Trash Present – Trash assessments are performed for a designated area around each outfall visited for field screening. The area of assessment is determined using the best professional judgment of the field team. If a trash assessment is performed, the field crew will fill out the trash assessment form included as Appendix XVIII.

Flow Classification and Estimation

At each site, the outfall is assessed for the presence of flowing or ponded water. If a site has flowing water, sampling staff shall also observe whether the flow reaches the receiving water body, if possible. At sites with flowing water, the flow rate is also measured and recorded on the field datasheet in gallons per minute (gpm). There are several methods that can be used to measure the rate of flow, but the most commonly used is the flowing creek or box culvert method or "leaf float method". This is done by using a stop watch or equivalent to measure the time it takes for a leaf or similar object to float across a pre-measured distance of flowing water. The flow rate can then be calculated by using width, depth, and velocity measurements. The three methods used to measure flow rate and a description of each are included below:

Flowing creek of box culvert method ("leaf float") – This method requires the physical measurement of the cross-sectional area and the velocity of the flowing water. Discharge is determined as the product of the area times the velocity:

Flow rate (gpm) = Velocity (ft/sec) x Depth (ft) x Width (ft) x 448.8

This method involves using a stop watch to measure the time (in seconds) it takes for a leaf or similar object to float across a pre-measured distance (in feet) of the surface of the flowing water. The flow rate can then be calculated by using the equation above.

Filling a bottle or known volume method – The rate can be determined by measuring the amount of time it takes to fill a bottle with a known volume in milliliters. Dividing the volume by the time (in seconds) and then multiplying by a conversion factor of 0.01585 gives a flow rate in gpm.

Flowing pipe method – This method is applicable to discharges from circular pipes. The rate can be determined by measuring the diameter of the outfall and the depth and velocity of the flowing water from the pipe. Calculations can be performed at the office, if unable to do so in the field.

Runoff and Site Characteristics

Observations of biology, deposits, and vegetation observed at the site are recorded for all sites, even if the site is dry.

Biology – Select all applicable options (more than one can be selected). Note that additional categories of organisms can also be notes by writing them in next to the "Other" option.

Deposits – Select one or more of the following: none, coarse particulate, fine particulate, stains/minerals, oily deposit, other. Coarse particulates include particles such as sand or gravel and fine particulates include any particulates that are smaller than the coarse particulates, such as from the presence of clay sediment. Stains or oily deposits, if observed, may require upstream source investigations if they appear recent. Mineral deposits can result in orange/red deposits and oil deposits are black in color.

Vegetation – Sites within manholes will almost always have no vegetation, so "none" shall be marked on the datasheet. If the vegetation is observed as less than what is typical for the site, due to excessive erosion or plant removal for instance, the site is considered to have "Limited" vegetation. Sites with vegetation that is overgrown and is impeding, or may impede, flow from the site, or that may contribute to other water quality issues, are considered to have "Excessive" vegetation. Sites observed with typical vegetation for the site are marked as "Normal".

Observations for floatables, odor, color, and clarity are assessed and recorded on a field datasheet only for sites with ponded or flowing water.

Floatables – Select one or more of the following: none, trash, bubbles/foam, sheen, algae, fecal matter, trash, or other. Only materials present on or very close to the surface of the water shall be included for this observation. For example, if trash is observed well below the water surface or at a dry site, trash shall not be marked as a floatable. However, trash would still be recorded in the trash assessment section in these cases.

Odor – Choose any of the following options that are most representative of the site conditions: none, musty, rotten eggs, chemical, sewage, or other. Any time a sewage odor is noted, additional investigation shall be completed, and/or the appropriate authorities or agencies shall be notified.

Color – Choose one of the following options most representative of the water when viewed *in situ*: none, yellow, brown (silty), white (milky), gray, other.

Clarity – If the water has minimal or no turbidity, mark "Clear." If the field team views the water at the site and can see more than 4" below the surface of the water,

the clarity field is marked as "Slightly Cloudy". When visibility is limited to less than 4" below the surface of the water, it is marked as "Opaque". If a limited amount of water is present at a site, the field team may collect the water and assess the clarity of the water in a clear plastic cup.

Potential Runoff Sources and Elimination

The flow source is assessed for all sites that have ponded or flowing water. If a site has flowing or ponded water, an upstream investigation may be necessary to determine the source of water. The source is traced upstream with the assistance of the City's MS4 map. Observations and notes are recorded on the field datasheet for evidence of an IC/ID, water source, basis for source identification, and source elimination.

Potential source categories include tidal (if the conductivity measurement is above 20.00 millisiemens/centimeter), ground water, irrigation runoff, vehicle washing, wet cleaning or power washing, pool or spa discharge (indicate if discharge was dechlorinated), water line break, sewage, NPDES permitted discharge, other, or unknown. Examples of NPDES permitted discharges include line flushing by local water utilities and groundwater dewatering conducted after obtaining a discharge permit from the RWQCB.

If the source of water is identified, the source elimination status is recorded as "Yes" if it was eliminated, "No" it was not eliminated. An example of flow source elimination is if washing activity from a business is stopped after talking with the responsible party and reporting the issue to the City. If multiple sources were identified, and some, but not all sources were eliminated, "No" shall be marked, and a full explanation of actions taken to eliminate any flow source shall be described in the comments.

Lastly, the location of the discharge and any identified responsible party(ies) are also recorded on the datasheet.

3.4 IC/ID Investigation

The following sections include a description of the procedures utilized by the Storm Water Division monitoring staff and enforcement officials when investigating IC/IDs. The City's investigations are designed to identify the source or sources of IC/IDs, and the investigations may result in identifying sources within the City's jurisdiction or, in some cases, to sources outside the City's jurisdiction. Approaches to addressing discharges from sources within and outside the City's jurisdiction are discussing in more detail in the following sections.

3.4.1 Monitoring Investigative Procedures and Prioritization

The City's monitoring staff adheres to the following guidelines for IC/ID investigation in accordance with the *San Diego County Copermittees Draft Investigation Procedures* prepared

for the County of San Diego. Validated IC/IDs are first prioritized to determine the appropriate response and whether field source investigations are needed. In accordance with Permit Section E.2.d.(1), the criteria for the prioritizations include the following:

1. Obvious illicit discharges (e.g., unusual color or odor) will be immediately investigated.
2. If sampling is conducted at an MS4 outfall in response to a complaint investigation or another monitoring program, then the sampling results shall be used to inform the prioritization process and determine the appropriate response. The prioritization considerations include:
    a. Pollutant level identified as an immediate threat to human health or the environment.
    b. Pollutants identified as causing or contributing to the highest priority water quality conditions identified within the WQIP for the respective WMA.
    c. Pollutants identified as causing or contributing to an exceedance of a numeric action level.
    d. Pollutants identified as causing or contributing, or threatening to cause or contribute to impairments in water bodies listed on the Clean Water Act Section 303(d) List of Water Quality Limited Segments and/or environmentally sensitive areas (ESAs) within the City's jurisdiction. A map of ESAs within the City's jurisdiction is included as Appendix XVI.
    e. Pollutants identified from sources or land uses known to exist within the area, drainage basin, or watershed that discharges to the portion of the storm drain system within the City's jurisdiction included in the investigation.

If it is determined that an IC/ID needs to be investigated immediately or is considered to be a high priority, monitoring field staff will perform the necessary investigation and attempt to identify the source(s) or potential source(s) of the IC/ID. Illicit discharges will typically be followed from the location where they are first observed in an upstream direction along the storm drain system.

The following steps are to be taken during a field investigation:

1. Proceed upstream along storm drain system conveyance as needed to trace possible source.
    a. If monitoring staff are initially unable to locate the source of the flow (e.g. the flow is traced to a seep, flow discharges from a pipe, the channel terminates, etc.) the following shall be considered possibilities: first, the flow may originate from a road gutter. Check catch basins and gutters between sites

for evidence of flows such as runoff from power washing, car washing, irrigation runoff, etc. There may also be an illicit connection to the system, possibly between manholes. Finally, look for evidence of recent or past dumping such as wet and/or stained pavement or gutters.

b. If necessary, contact the appropriate department/division for assistance on tracking below ground storm drain system. When tracking flows in below ground systems it may be necessary to follow flows from the outfall or manhole to the next manhole with a junction. Manholes will not always need to be checked if there are no junctions between them. Field staff will record information on the surrounding areas and look for water flowing in gutters and streets.

c. If flow is observed coming from only one location within the storm drain system, continue tracking upstream from that outlet. If flow is observed coming from more than one location, track them upstream one at a time, using visual observations, odors, and/or field screening sampling to determine the order of investigation. It is generally easiest to track the largest flows first, but if they are about the same size, start with the one that is easiest, shortest, or with the least number of junctions, or track those originating from areas with the greatest potential for illicit discharges.

2. Collect samples at upstream confluences as needed for chemical analyses.
3. If possible, trace dry weather flow from conveyance to street/storm drains.
    a. If a flow source is not easily identified, samples may be collected as needed for chemical analysis. Such analyses shall be selected based on the field staff's best professional judgment regarding what sources may be present.
4. If dry weather flow is traced to a facility, collect sample at curb or public right of way and submit for chemical analysis. Document with photos.
5. If the flow is coming from another jurisdiction, make a note and notify your supervisor, so a formal notification in writing can be made to a representative of the relevant jurisdiction informing them of the situation. Field staff will not trace flows into other jurisdictions.

3.4.1.1 Discharge Investigation Endpoints

The discharge at each major outfall shall be evaluated by analyzing all of the information and data available prior to determining the source of the discharge. The information provided below includes four potential endpoints of a discharge investigation and includes general guidance regarding the potential characteristics and constituents of concern typically associated with each endpoint. This allows field staff to focus on specific

endpoints as they evaluate multiple constituents/characteristics of the discharge in order to determine the source of the discharge.

Natural in Origin and Conveyance (Endpoint A)

If the City suspects the source of a non-storm water discharge as natural in origin (i.e., non-anthropogenically influenced), then the City will document the discharge and provide the data and evidence necessary to demonstrate to the RWQCB that the discharge is natural in origin and does not require further investigation. Examples of non-storm water discharges that may be natural in origin include the following:

- Natural sources infiltrating or entering the storm drain may include:
- Diverted stream flows
- Rising ground waters
- Uncontaminated ground water infiltration to storm drain systems
- Springs
- Flows from riparian habitats and wetlands
- Discharges from foundation drains
- Discharges from footing drains

Discharges will be addressed as illicit discharges by a future amendment to the Storm Water Ordinance only if the City or the RWQCB identifies the discharge as a source of pollutants to receiving waters (Municipal Permit Section E.2.a.(3)).

The constituents and characteristics of these types of discharges are summarized below.

Potential Characteristics	Potential Constituents
• Dissolved oxygen tend to be low • Color tends to be clear • Turbidity tends to be low • Hardness tends to be high • Total dissolved solids tend to be high • Bubbling into channel • Seeping into storm drain system pipe joints • Cracks from tree roots • Moist sides/bottom of channel • High water table in region	• Iron • Manganese • Selenium • Sodium • Calcium • Nitrate

Illicit Discharge or Connection (Endpoint B)

If the City identifies the source of a discharge as a controllable source, the City's Enforcement Response Plan will be used to enforce its legal authority to prohibit and eliminate IC/IDs to its storm drain system. Using a combination of observations (discoloration and odor) and immediate in-field results (pH, dissolved oxygen, turbidity, and detergents), field staff may be able to determine if the flow is the result of an illicit discharge or connection.

The constituents and characteristics of these types of discharges are summarized below.

Potential Characteristics	Potential Activities
• Foam/suds • Colored discharge • Low Dissolved Oxygen • Oil Sheen • High or low pH • Odor • Nitrogen • Phosphorus • Metals • Trash/Materials • High Turbidity	• Vehicle Washing • Steam Cleaning • Pool Discharge • Concrete/Plaster • Acid Washing • Sewer Overflows • Construction • Greywater Discharge • Irrigation

Other Non-Storm Water Discharges (Endpoint C)

Non-storm water discharges must be addressed as illicit discharges or connections unless a non-storm water discharge is either identified as a discharge authorized by a separate NPDES permit, or identified as a category of non-storm water discharges or flows that are addressed by other requirements. If the City identifies the source of the discharge as a category of non-storm water discharges listed in Section 3.2.2, and the discharge is in exceedance of numeric action levels in the respective WQIP, then the City will work to determine if:

1. The discharge is an isolated incident or set of circumstances that will be addressed through its Enforcement Response Plan.
2. The category of discharge must be addressed through the prohibition of that category of discharge as an illicit discharge, which would result in an amendment to the Storm Water Ordinance.

Unidentified (Endpoint D)

If field staff is unable to identify the source of the discharge, the discharge must be addressed as an illicit discharge, and the City must update its JRMP to address the common

and suspected sources of the non-storm water discharge within its jurisdiction. Also, per the Assessment Requirements in Municipal Permit Section D.4.b, additional investigation may be necessary.

3.4.2 Enforcement Official Investigative Procedures and Prioritization

Upon receiving a complaint, enforcement officials must initiate the investigation process to determine if a non-storm water discharge exists, if such discharge is a violation of the Municipal Code, and the impact to water quality. Methods of investigation include direct observation, drive-bys, foot patrols, odors, and storm drain inspections. Enforcement officials respond in a timely manner to obtain evidence supporting their investigation results to determine the corresponding enforcement level depending on the assigned priority of the complaint. Complaints received via the Storm Water Division Hotline are prioritized in accordance with the Storm Water Division's *Policy & Enforcement Unit Standard Operating Procedures*. Any complaint not within the jurisdiction of the City will be forwarded to the appropriate agency or jurisdiction within one working day.

3.4.2.1 Follow-up Investigations

The appropriate enforcement official conducts a follow-up investigation after a reasonable amount of time for resolution has passed, or on the date noted for compliance on the NOV, and/or on the date agreed upon with the responsible party. If compliance has not been achieved, the responsible party will be contacted for information on why the IC/ID has not been eliminated. Follow-up inspections and actions are documented in the enforcement official's investigation report. The IC/ID will also be referred to appropriate City departments or other agencies if additional remedial assistance is necessary.

3.4.2.2 Education of Responsible Parties

Educational material is provided to the alleged responsible parties when identified. When a responsible party cannot be determined, letters or educational materials that explain how to comply with the Municipal Code may be distributed to the neighboring residences or businesses.

3.4.2.3 Complaint and Violation Database

Code Enforcement staff maintain case files on all complaints for reference, follow-up, and reporting to management and the RWQCB (e.g., the JRMP Annual Report). The City will maintain records and a database of the following information for IC/ID investigations:

- Location of incident, including hydrologic subarea, portion of storm drain system receiving the non-storm water or illicit discharge, and point of discharge or potential discharge from storm drain system to receiving water.
- Source of information initiating the investigation (e.g., public reports, staff or contractor reports and notifications, field screening, etc.).

- Date the information used to initiate the investigation was received.
- Date the investigation was initiated.
- Dates of follow-up investigations.
- Identified or suspected source of the illicit discharge or connection, if determined.
- Known or suspected related incidents, if any.
- Result of the investigation.
- If a source cannot be identified and the investigation is not continued, document the response pursuant to the requirements of Municipal Permit Section E.2.d.(3).

3.4.3 Other Investigative Procedures

In addition to the investigation procedures previously described in this section, the City may also employ the following methods to identify the source of an IC/ID:

Review of Plans – As-built drawings for the area of concern may be obtained to verify connections. However, an illicit connection is likely to have occurred after the as-built drawings were created, so additional techniques shall also be employed.

Dye Testing – Dye testing is useful to confirm hydraulic connections between the potential source and the location downstream. Fluorescent dye is discharged at the source of the potential IC/ID and is monitored downstream. This method is used only when necessary because the public and appropriate regulatory agencies in the surrounding area need to be informed of the cause of the water discoloration.

Smoke Testing – Smoke testing can be used only on underground storm water conveyance facilities, to determine potential hydraulic connections between the source and downstream location. Again, the public and appropriate agencies need to be informed of the cause for smoke coming from the storm drain system.

Video Monitoring – Mobile video cameras may be used to record observations in an underground storm water conveyance facility. The public and regulatory agencies generally do not need to be informed prior to initiating this kind of investigation.

Confined Space Entry – In some cases, underground conveyances are large enough that a crew trained in confined space entry may investigate the section of pipe or culvert in question instead of using video monitoring. All applicable health and safety regulations must be followed. The public and regulatory agencies, however, generally do not need to be informed prior to initiating a confined space entry.

Potential Sewage IC/IDs – Further testing of suspected sewage-related flows is conducted when visual and odor observations do not adequately confirm the presence of sewage.

- Ammonia - Sewage frequently contains ammonia levels of 30 milligrams/Liter or greater. Typically, this can be measured with an inexpensive field screening kit.
- Bacteria - Sewage generally has high levels of total and fecal coliform bacteria and *Enterococci* bacteria. Sewage treatment plants and many laboratories routinely conduct these indicator analyses.

3.5 IC/ID Elimination

From the information gathered during investigation of an IC/ID, City enforcement officials ensure the IC/ID is eliminated, establish required corrections, evaluate applicable storm water BMPs, provide suggestion to prevent future IC/IDs, and take appropriate enforcement action as described in Section 3.6 and in the City's Enforcement Response Plan (Appendix XIII). The City takes immediate action towards the elimination of detected IC/IDs to the City's storm drain system which may include the referral to the appropriate City department or other agency for abatement (as summarized in Table 3-3), or working with a responsible party for an IC/ID, if one is identified during investigation. If the discharge originates from a source outside the City's jurisdiction, the City will also notify the agency with jurisdiction over the source and, where applicable, the RWQCB.

If a responsible party has been identified during an IC/ID investigation, the responsible party is required to take appropriate action to eliminate the IC/ID and to perform any necessary clean-up or remediation in accordance with the City's Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX). Any refusal by the responsible party to perform necessary actions to eliminate the IC/ID will be handled by Code Enforcement staff and appropriate enforcement action will be taken. If a responsible party is identified, but neglects to perform the necessary corrective action, the City may bill the responsible party for abatement costs. Additionally, the City will perform abatement of an IC/ID to the City's storm drain system if a responsible party is not identified.

When a discharge originates from a source outside the City's jurisdiction, the City does not have legal authority to require that the discharge be eliminated. The City will notify the responsible agency with jurisdiction over the source of the discharge so that that agency can take action to eliminate the discharge. In the event that the responsible agency is not responsive or otherwise does not eliminate the discharge in a timely manner, the City may notify the RWQCB as well.

Appropriate remedial actions that may be taken to eliminate discharges may include the following:

- Redirect non-hazardous discharges to the sanitary sewer, collection container, or onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.
- Redirect hazardous discharges to a collection container for reuse or disposal via a licensed hazardous waste disposal service.
- If a discharge cannot reliably be stopped without eliminating the physical connection from the source of the discharge to the storm drain system, disconnect the illicit connection such that discharges are not conveyed to the storm drain system. This type of remedial action typically applies only when the primary function of a connection is to convey an illicit discharge, such as a pipe connecting a commercial vehicle wash area to the storm drain system.

Note that discharges to the sanitary sewer system are subject to conditions and approval by the City's PUD. In some cases, special permits from the local wastewater authority are needed before material can be discharged to the sanitary sewer system in addition to approval by the PUD.

3.6 IC/ID Enforcement

Enforcement action related to IC/IDs will be taken by the City's enforcement officials, which typically include inspectors and Code Enforcement staff. While enforcement officials have several different methods available to obtain compliance with applicable regulations, officials generally follow an established enforcement system to abate the violation and to bring the responsible party into compliance.

If compliance is not achieved as noted during a follow-up visit, enforcement officials contact the responsible party for information on why the violations have not been corrected; as the Permit requires that violations are corrected within 30 days of becoming aware of the violation or that a rationale is recorded explaining why the corrections have not been made. Violations are reviewed to determine if additional enforcement action is needed, which is dependent on the nature of the discharge, corrective actions taken, and prior compliance history.

As described in Section 3.5, if the City identifies that the source of a discharge is outside its jurisdiction, the City will notify the agency that does have jurisdiction over the source and ask that jurisdiction to take the steps necessary to eliminate the discharge. The City does not have legal authority to apply the enforcement process described below to such sources. If the sources are not eliminated in a timely manner, the City may elect to report the discharge and responsible agency to the RWQCB.

The established enforcement system is described below as escalated levels of enforcement. Generally, escalated enforcement action is taken after Level 1 enforcement.

Additional escalated enforcement actions are described in the Enforcement Response Plan (Appendix XIII). Enforcement actions discussed below may change as needed due to increasingly stricter water use regulations in response to drought conditions or in response to unanticipated circumstances.

Level 1. Educational letters, BMP documents, or pamphlets

Enforcement officials utilize Level 1 enforcement when proof of an alleged discharge cannot be found. Also, enforcement officials will use education to enforce new minimum BMP requirements for municipal, residential, and industrial/commercial sectors.

Level 2. Education and Issuance of a Notice of Violation (NOV)

For violations of the City's Storm Water Ordinance, if a responsible party is identified and sufficient evidence exists, a NOV may be issued. For initial violations of regulations such as the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), educational letters or pamphlets will be distributed to the violator, as well as potentially a NOV. The NOV states that an illicit discharge has occurred (or is occurring) and establishes an abatement deadline. After the City completes adequate outreach and education regarding minimum BMPs to responsible parties, the City may pursue additional levels of enforcement for failure to implement the minimum BMPs.

Level 3. Issuance of an Administrative Citation

Enforcement officials utilize Level 3 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 enforcement official will generally include educational information on the types of BMPs that shall be implemented thereafter to avoid future violations.

Level 4. Issuance of Administrative Civil Penalties

City enforcement officials utilize Level 4 enforcement when proof of discharge and a responsible party can be identified and the discharge is more severe than discharges receiving Level 3 enforcement. After reviewing all the case information, the enforcement official determines the appropriate penalty, and issues a Civil Penalty Notice and Order. The City may assess administrative civil penalties up to a rate of $10,000 each day the violation continues, may recover the costs of enforcement, and may establish other appropriate corrective measures. In the event the responsible party does not comply with the Civil Penalty 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. (San Diego Municipal Code Section 43.0311)

Level 5. City Attorney Referral (Civil or Criminal Action)

Enforcement officials utilize Level 5 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.

3.7 Education and Training

3.7.1.1 New Employees

The Storm Water Division is responsible for developing and providing all new employee trainings. All new City staff will receive a basic introduction to storm water issues 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.

3.7.1.2 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Storm Water Division's Code Enforcement and monitoring staff in consultation with the Storm Water Division Education and Outreach Program (e.g., including the "Think Blue" logo on materials). Table 3-5 lists the activities, specific targeted communities, and the anticipated completion dates.

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

Activity	Target Audience(s)*	Schedule
Copy of Storm Water Ordinance	1-4	Ongoing
Storm Water Division Hotline to report IC/IDs	1-4	Ongoing
"Think Blue" educational brochures	1-4	Ongoing
Distribute "Contain, Control, Capture" BMP document	1-4	Ongoing
Business specific BMP factsheets	1, 3	Ongoing
Clean Construction Brochure for construction sites	2	Ongoing
Construction BMPs flyer	2	Ongoing

* Denoted as follows:

1. Industrial Owners and Operators
2. Construction Site Operators
3. Commercial Owners and Operators
4. Residential Community, General Public, and School Children

3.8 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the JRMP annual report is due by October 31, 2015. Starting the following fiscal year, WQIP annual reports, which will include the JRMP annual report, are due by January 31 (e.g., the fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

As part of the annual reporting process for the IDDE component of the JRMP, the City will list sources of discharges to the City's storm drain system, including sources outside the City's jurisdiction, which were identified during the reporting year and recorded in the City's databases. This information will be used both for the City's JRMP annual report and in preparing WQIP annual reports.

3.9 Additional Water Quality Improvement Plan Strategies for the Storm Water Division

In addition to the JRMP strategies described in the preceding sub-sections, the Storm Water Division has identified additional BMPs, or strategies, to achieve water quality improvement goals in affected WMAs. The City has developed these strategies and included them in the City's six watershed-based WQIPs, as required by Section B.3 of the Municipal Permit.

The Storm Water Division is responsible for implementing the additional strategies listed in Table 3-6. More information about the specific strategies listed below is available in JRMP Appendix XX, which is a table listing all the strategies from the City's six WQIPs. Several of the strategies include coordination between Storm Water and Public Utilities staff to identify and eliminate IC/IDs, including irrigation runoff. Continuous flow monitoring to identify sources of dry weather flow, including irrigation runoff and other IC/IDs, is included in some of the City's special studies and source investigation efforts. The WQIP strategies are subject to change and are contingent upon annual budget approvals and funding availability, and they will be modified through the adaptive management process as needed.

Table 3-6. Additional IDDE Program WQIP Strategies

Strategy ID(s)	Strategy
CSD-JRMP-55*	Focused enforcement of irrigation runoff.
CSD-JRMP-56*	Focused enforcement of water-using mobile businesses.
CSD-JRMP-57*	Focused enforcement of all minimum BMPs for existing residential, commercial, and industrial development.
CSD-JRMP-58*	Focused enforcement associated with property-based inspections.
CSD-JRMP-59*	Focused enforcement of sweeping and maintenance of private roads and parking lots in targeted areas.
CSD-JRMP-60*	Focused identification and enforcement of actionable erosion and slope stabilization issues on private property and require stabilization and repair.
CSD-NS-18	Continue participating in source reduction initiatives.
CSD-NS-23	Conduct special studies.
CSD-NS-24	Lower Tijuana River WMA Sediment Source Characterization Study
CSD-NS-25	Peñasquitos Watershed Special Study
CSD-NS-26	Participate in Reference Watershed Study.
CSD-NS-27	Participate in Reference Beach Study.
CSD-NS-28	Tecolote Creek Quantitative Microbial Risk Assessment (QMRA).
CSD-NS-29	San Dieguito Source Identification and Prioritization Process
CSD-NS-30	Collaborate with City of San Diego PUD and other watershed stakeholders in the Lake Hodges Water Quality Concentration Study. Study will characterize conditions and identify sources.
CSD-NS-31	Using adaptive management, delist the beach segment from the TMDL and Attachment E of the MS4 Permit.

* Strategies marked with an asterisk are considered "jurisdictional" in the MS4 Permit, but are considered enhancements to the JRMP to target highest priority water quality conditions.

3.10 Famosa Slough Activities and Commitments

Famosa Slough is listed as an impaired water body on the Clean Water Act section 303(d) list for eutrophication, which has been caused by excessive nutrients (total nitrogen and total phosphorus). To address eutrophication in the Famosa Slough area of the San Diego River WMA, the City will conduct the activities listed below per the commitment with the San Diego Water Board to develop and implement a TMDL alternative.

The implementation actions noted in this section are subject to updates and changes through the adaptive management process. Additional details and updates will be included in the WQIP, future JRMP updates and through the annual reporting process.

Implementation Schedule

Year	Schedule to Address the Eutrophication Impairment in Famosa Slough.	
	Activity	**Month/Year**
0	Properly implement an illicit discharge detection and elimination program in compliance with existing requirements of the Regional MS4 Permit to effectively prohibit the City's non-storm water discharges into the MS4 system that discharge into Famosa Slough. Implementation includes illicit discharge detection and elimination, and the assessment of accomplishments / progress.	Ongoing
0	City prepares JRMP Compliance Monitoring Plan and QAPP updates for Famosa Slough. City submits QAPP to San Diego Water Board for review.	Dec 2017
1	City modifies the JRMP to include water quality monitoring activities and weekly enforcement patrols specific to Famosa Slough. Modifications to the JRMP will also include the addition of this schedule and a statement committing the City to develop and implement Water Quality Improvement Plan strategies, Load Reduction Plans, and Implementation Plans (patrols and monitoring) for the Famosa Slough project.	Jan 2018
1	City initiates the preparation of the San Diego River Watershed WMA WQIP Goals, Strategies, Load Reduction Plans, Implementation Plans, and Schedules that align with the City's Famosa Slough final TMDL and technical report, the San Diego Water Board's Famosa Slough Staff Reports and this schedule.	Jan 2018
1	Begin compliance monitoring program for the Slough.	May 2018
1	Begin algae harvesting in response to excessive algal blooms.	May 2018
1	City submits for review to the San Diego Water Board, the WQIP goals, strategies, and schedules associated with Famosa Slough project for acceptance to the January 2019 WQIP update. Update materials will be presented to the San Diego River WMA Consultation Panel in July 2018.	July 2018
2	City incorporates WQIP goals, strategies, monitoring plan, QAPP, and schedules associated with Famosa Slough project into San Diego River WQIP Annual Report.	Jan 2019

Year	Schedule to Address the Eutrophication Impairment in Famosa Slough.	
	Activity	**Month/Year**
2	San Diego Water Board accepts the WQIP update for Famosa Slough within 90 days of WQIP Annual Report submittal.	Apr 2019
3	City submits annual WQIP Report and annual Monitoring Report for the Slough demonstrating achievement of annual milestone(s) that complies with section B.3.c. of the Regional MS4 Permit.	Jan 2020
4	City submits annual WQIP Report and annual Monitoring Report for the Slough demonstrating achievement of annual milestone(s) that complies with section B.3.c. of the Regional MS4 Permit.	Jan 2021
5	City submits annual WQIP Report and annual Monitoring Report for the Slough demonstrating 40% attainment with required reduction in waste load allocations.	Jan 2022
6	City submits annual WQIP Report and annual Monitoring Report for the Slough demonstrating achievement of annual milestone(s) that complies with section B.3.c. of the Regional MS4 Permit.	Jan 2023
7	City submits annual WQIP Report and annual Monitoring Report for the Slough demonstrating achievement of annual milestone(s) that complies with section B.3.c. of the Regional MS4 Permit.	Jan 2024
8	City submits annual WQIP Report and annual Monitoring Report for the Slough demonstrating achievement of annual milestone(s) that complies with section B.3.c. of the Regional MS4 Permit.	Jan 2025
9	City submits annual WQIP Report and annual Monitoring Report for the Slough demonstrating 80% attainment with required reduction in waste load allocations.	Jan 2026
10	City submits annual WQIP Report and annual Monitoring Report for the Slough demonstrating achievement of annual milestone(s) that complies with section B.3.c. of the Regional MS4 Permit.	Jan 2027
11	City submits annual WQIP Report and annual Monitoring Report for the Slough demonstrating 100% attainment with required reduction in waste load allocations.	Jan 2028

Famosa Slough Drainage Area Storm Water Code Enforcement Patrols

The City's Storm Water Code Enforcement Officers will conduct weekly patrols through the Famosa Slough drainage area to address violations to the San Diego Municipal Code §43.0301 – 43.0312, the "Stormwater Management and Discharge Control Ordinance." The area has been divided into three areas that Code Enforcement Officers will visit weekly.

Patrols will not occur in case of wet weather, emergencies or otherwise unforeseeable staffing issues.

Officers will complete a form that documents each patrol that includes all discharges, addresses, enforcement actions taken and any other pertinent information. This information will be included in the JRMP/WQIP Annual Reports.

Enhanced Street Sweeping

The City will study the option of conducting additional or enhanced street sweeping, including parking restrictions, in the Famosa Slough drainage area, as resources allow. The specific additions or enhancements will be included in the WQIP and/or the annual JRMP update once the street sweeping actions have been determined.

Targeted Outreach Campaign

The City will develop and implement a targeted public outreach campaign to inform the local residents and businesses of the ecological importance of the Famosa Slough as well as highlight prohibited discharges and consequences of violating the municipal code. Outreach actions may include, but are not limited to, targeted fact sheets, social media activities, coordination with local schools and Friends of the Famosa Slough. Details of the outreach campaign will be included in the WQIP, future updates of the JRMP, and through the annual reporting process.

Famosa Slough Monitoring and Algal Mat Removal

The City is developing a Monitoring Plan and QAPP for the Famosa Slough was submitted to the Regional Board in December 2017. Baseline monitoring will begin in May 2018, with compliance monitoring beginning in May 2019. Details of the monitoring activities will be described in the monitoring plan.

At a minimum, the City will conduct the following activities:

- Water quality monitoring on a quarterly basis for nutrients (TP, TN, and DO) and general constituents (such as temperature, salinity, pH)
- Monitoring of biomass for algal mats in the slough weekly June 1st through October 31st of the year.
- Monthly monitoring of biomass for algal mats in the slough November 1st through May 31st of the year.
- Algal mat removal, twice per year June 1st through October 31st of the year, and/or as necessary.

San Diego River WMA WQIP Update

The City will develop and implement San Diego River WMA Water Quality Improvement Plan Goals, Strategies, Load Reduction Plans, Implementation Plans and Schedules that follow the Famosa Slough TMDL Technical Report, the San Diego Water Board's Famosa Slough Staff Report, and the schedule noted above. Updates to the implementation actions discussed in this section will be included through the annual reporting process.

4.0 Development Planning

4.1 Introduction

The development of urban areas has the potential to negatively impact the surrounding environment. Development can facilitate the introduction of human-generated pollutants into the environment, and the addition of impervious surfaces can alter natural drainage patterns. The Regional Water Quality Control Board, San Diego Region Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit) requires the City to establish a development planning program to ensure all development projects incorporate minimum best management practices (BMPs) in accordance with Section E.3. The Permit prescribes minimum source control BMP requirements and site design Low Impact Development (LID) requirements for all projects regardless of the size. Additionally, the Permit requires Priority Development Projects (PDPs) to incorporate pollutant control BMPs and hydromodification management BMPs.

Accordingly, the City of San Diego (City) has developed a program to reduce the negative impacts of urban development through careful land use planning and thoughtful project design. The program includes establishing requirements for development projects; review and

Responsible Department(s), Branch(es), or Division(s):

- Engineering Division of the Development Services Department (Sections 4.3, 4.4, 4.5, 4.7, 4.8)
- Building/Construction & Safety Division of the Development Services Department (Section 4.4)
- Land Development Review Division of the Development Services Department (Section 4.4)
- Engineering & Capital Projects Branch of the Public Works Department (Sections 4.3, 4.4, 4.5, 4.7, 4.8)
- Storm Water Division of the Transportation & Storm Water Department (Sections 4.2, 4.3.2.1, 4.5, 4.6, 4.7, 4.8)
- Environmental Services Department (Section 4.3.2.1 only)
- Engineering and Program Management Division of the Public Utilities Department (Section 4.3.2.1 only)
- Street Division of the Transportation & Storm Water Department (Section 4.3.2.1 only)

Supporting Department(s), Branch(es), or Division(s):

- Code Enforcement/LEA Division of the Development Services Department (Section 4.4.3 only)
- Project Submittal and Management Division of the Development Services Department (Section 4.5 only)

approval process; inspection procedures; training of staff and record keeping.

The General Plan is the City's strategic framework for development. Through the "Urban Runoff Management" section within the Conservation element and the "Storm Water Infrastructure" section within the Public Facilities, Services, and Safety element, it provides general guidance related to reducing impacts of development on storm water quality. The Planning Department consults the Storm Water Division of the Transportation & Storm Water Department (T&SW), the Development Services Department (DSD), and the Public Works Department (PWD) to incorporate updated storm water requirements in the General Plan or community plans updates.

The City's Jurisdictional Runoff Management Plan (JRMP) must meet the requirements of the Municipal Permit, as described in Table 4-1.

Table 4-1. Municipal Permit Requirements – Development Planning

JRMP Section	Municipal Permit Section	Requirement (Summary)
4.2 and Appendix VII	E.3.a.	The City must prescribe general, source control, and LID BMP requirements, as outlined in the Permit, during the planning process for all development projects.
4.2 and Appendix VII	E.3.b-c.	In addition to the BMP requirements for all development, the City must also require each PDP to implement onsite structural BMPs to control pollutants in storm water, and manage hydromodification that may be caused by storm water discharged from a project.
4.3 through 4.6	E.3.e.(1)(b)	The City must identify the roles and responsibilities of its various municipal departments in implementing the structural BMP requirements, including each stage of a project from application review and approval through BMP maintenance and inspections
4.4	E.3.e.(1)(d)	The City must require and confirm that prior to occupancy and/or intended use of any portion of the PDP, each structural BMP is inspected to verify that it has been constructed and is operating in compliance with all of its specifications, plans, permits, ordinances, and the requirements of the Municipal Permit.
4.6	E.3.e.(2)	The City must develop, maintain, prioritize, and update at least annually, a watershed-based

JRMP Section	Municipal Permit Section	Requirement (Summary)
		database to track and inventory all PDPs and associated structural BMPs within its jurisdiction.
4.6	E.3.e.(3)	The City is required to verify that structural BMPs on each PDP are adequately maintained, and continue to operate effectively to remove pollutants in storm water to the maximum extent practicable through inspections, self-certifications, surveys, or other equally effective approaches.
4.4.3, 4.6.3	E.3.f.	The City must enforce its legal authority established for all development projects, as necessary, to achieve compliance with the requirements of the Permit.
4.8	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

The JRMP activities described throughout the remainder of this chapter fulfill the requirements of the Municipal Permit listed in Table 4-1. These JRMP activities are also summarized and included as strategies in each of the City's six Water Quality Improvement Plans (WQIPs). Table 4-2 below identifies the applicable JRMP activities that have been identified as WQIP strategies. These strategies are also included in Appendix XX of the JRMP.

Table 4-2. JRMP Strategies Identified in the WQIPs

Strategy ID	Strategy
CSD-JRMP-01	Establish guidelines and standards for all development projects; provide technical support related to implementation of source control BMPs to minimize pollutant generation at each project and implement LID BMPs to maintain or restore hydrology of the area or implement easements to protect water quality, where applicable and feasible. Includes internal coordination and collaboration between City departments (DSD, PWD, and Engineering) to improve success and long-term benefits of BMPs.
CSD-JRMP-02	Develop Design Standards for Public LID BMPs.
CSD-JRMP-06	Provide technical education and outreach to the development community on the design and implementation requirements of the MS4 Permit and Water Quality Improvement Plan requirements.

Strategy ID	Strategy
CSD-JRMP-07	For PDPs, administer a program and provide technical support to other City departments to ensure implementation of on-site structural BMPs to control pollutants and manage hydromodification by developing City wide storm water development standards and design guidelines.
CSD-JRMP-08	Institute a program to verify and enforce maintenance and performance of treatment control BMPs.
CSD-JRMP-09	Update Storm Water Standards Manual to determine nature and extent of storm water requirements applicable to development projects and to identify conditions of concern for selecting, designing, and maintaining appropriate structural BMPs.
CSD-JRMP-38	Development of a strategy and identification of candidate areas of existing development necessary for implementing retrofit projects and facilitate the implementation of such projects.
CSD-JRMP-39	Development of a strategy and identification of candidate areas necessary to implement stream, channel, or habitat rehabilitation projects and facilitate implementation of such projects.

Additional strategies have been identified to help meet the water quality goals in the WQIPs; those strategies are identified in Section 4.9. These strategies will be managed by the Storm Water Division and are considered enhancements to the Development Planning Program. The full list of WQIP strategies is included as Appendix XX of the JRMP.

4.2 Development Planning Program Implementation

The City's Storm Water Standards Manual (Appendix VII) establishes development requirements and prescribes performance standards for structural BMPs in accordance with the Municipal Permit. The Storm Water Standards Manual is part of the City's Land Development Manual and is enforceable via the San Diego Municipal Code, including Sections 43.0307, 129.0104, and 142.0210. The City of San Diego developed the first Storm Water Standards Manual in 2001 in accordance with the 2001 Municipal Permit and has updated it twice since then to incorporate updated requirements in subsequent Municipal Permits.

The Storm Water Division, Development and Construction Standards Section updated the Storm Water Standards Manual to ensure it meets current Municipal Permit requirements. The updated Storm Water Standards Manual, that went into effect on February 16, 2016, is included in Appendix VII.

4.3 Development Projects Review and Approval

The City of San Diego has established procedures for reviewing and approving all development projects to ensure that they meet the BMP requirements described in the Storm Water Standards Manual and comply with the Municipal Permit. Private developments as well as Capital Improvement Program (CIP) projects and other public projects are subject to the same storm water BMP requirements as stated in the Storm Water Standards Manual. However, the City's procedures for design, review and approval slightly varies between public and private projects.

The Development Services Department and the Engineering and Capital Projects Branch of Public Works Department are primarily responsible for performing activities in this section. A general description of the submittal and review procedures is provided in the sections below.

4.3.1 Private Development Projects Review and Approval

DSD is responsible for reviewing submittals of proposed private development projects. Every private project is required to fill out the Storm Water Requirements Applicability Checklist (Form DS-560) to determine if the project is a PDP, Standard Development Project (SDP), or Exempt and to determine which requirements apply. The storm water review process for private projects begins with DSD's engineering staff (reviewer), who reviews the Storm Water Requirements Applicability Checklist included in each submittal and ensures that the project has been properly identified as a PDP, a SDP, or Exempt. The reviewer adds a project tag in the Project Tracking System (PTS) indicating the project category (PDP, SDP, Exempt).

In the case of a SDP, the assigned reviewer checks the submitted construction documents to ensure that the project meets the minimum site design and source control BMP requirements set forth for all development projects in the Storm Water Standards Manual.

If a project is determined to be a PDP, it is required to submit a Storm Water Quality Management Plan[1] (SWQMP) at initial submittal to assure incorporation of structural BMPs at initial design. The SWQMP is a project-specific document that describes how the development will meet all of the structural BMP requirements specified in the Storm Water Standards Manual. Reviewers ensure that the SWQMP sufficiently demonstrates how the project will meet all of the site design, source control, structural pollutant control BMP and

[1] Projects subject to the requirements of the current Storm Water Standards Manual may submit a Water Quality Technical Report (WQTR) in place of a SWQMP. For the purposes of this document, SWQMP refers to either a Storm Water Quality Management Plan or a Water Quality Technical Report, whichever is appropriate for a given project.

hydromodification requirements, if applicable, specified in the Storm Water Standards Manual.

After the SWQMP has been accepted and prior to permit issuance, the applicant must submit a Storm Water Management and Discharge Control Maintenance Agreement (Maintenance Agreement). The Maintenance Agreement gives the City legal authority to require the property owner to perform maintenance structural BMPs on the site and includes a structural BMPs exhibit. The Maintenance Agreement is recoded with the County Recorder and runs with the land, so maintenance responsibility is transferred with sale of the property. The Maintenance Agreement is signed by the project property owner and by DSD's Deputy City Engineer. Additionally, the reviewer verifies that the construction documents, e.g. plans, include a separate BMP plan sheet to show all structural BMPs with details and cross sections as appropriate.

At the end of the review cycles and prior to permit issuance, the engineering review staff reviews all applicable project documents to ensure consistency; this includes the project plans, Maintenance Agreement BMP exhibit and the SWQMP. Construction permits will not be issued for the project unless the structural BMP information is consistent among all of the project's documents. Furthermore, any construction changes proposed after permit issuance are checked and reviewed by a reviewer prior to approval to ensure that the proposed change is in compliance with the Storm Water Standards Manual requirements. The reviewer requests the applicant to revise BMP information on plans, Maintenance Agreement exhibit and SWQMP as necessary to reflect the construction changes.

4.3.2 Conditional Use Permits for Mining Operations

A Reclamation Plan approved under a Conditional Use Permit (CUP) for a mining operation cannot be implemented until the developer obtains a grading permit from the City. Any violation of this requirement is to be reported immediately to Code Enforcement. For future CUP's issued for mining projects, reviewers will impose conditions to specifically state that a Grading Permit will be required in order to implement the Reclamation Plan, and that SWPPP coverage under the Statewide Construction General Permit (CGP) will be required prior to grading activities. Training has been provided to DSD and Planning staff to ensure that this review and approval process is completed and that City reviewers and inspectors can differentiate between coverage under the CGP and the Industrial General Permit (IGP) process.

Mining operators will be required to submit annual reports to the State about the status of the mining operations. The City's Surface Mining and Reclamation Act (SMARA) lead also gets a copy of this report and when mining operations have ceased, will now direct the operator to obtain a Grading Permit to implement the Reclamation Plan.

The City will inspect BMPs for SMARA projects quarterly during dry seasons and monthly during wet seasons in order to help ensure effective BMPs are in place. As part of the grading permit approval process, projects will be tagged with the appropriate construction inspection frequency according to the site location.

~~4.3.2~~4.3.3 Capital Improvements Program and other Public Project

The Engineering and Capital Projects Branch of PWD is the primary department responsible for the design, project management and construction management of most proposed CIP projects and other public improvement projects within the City of San Diego. PWD is responsible for incorporating applicable structural BMPs requirements into all Capital Improvement Program projects and other public improvement projects (projects) under its authority, including source control, site design BMPs, pollutant control and hydromodification control in accordance with the Municipal Permit.

PWD established a Standard Operating Procedure (SOP), SOP-4.5.6 (Appendix V), to ensure all applicable BMPs are designed and constructed to meet the Municipal Permit requirements and in accordance with the Storm Water Standards Manual. The SOP establishes an internal process that details storm water procedures for design, quality assurance/quality control, construction inspection, data tracking, reporting and relevant staff roles and responsibilities. The SOP reflects PWD current staffing and procedures and may be updated regularly to reflect changes in the organizational structural and process; however, it will always meet the intent of the permit.

~~4.3.2.1~~4.3.3.1 Internal Review of Public Projects by Select Departments

While the majority of CIPs and public improvements are designed and managed by PWD as described above, a few departments implement minor public improvement projects. This section outlines the procedure for these departments to ensure compliance with applicable storm water requirements.

Environmental Services Department Projects

The Environmental Services Department (ESD) occasionally initiates minor public improvement projects on ESD facilities. ESD Deputy City Engineer (DCE) is responsible for overseeing the project design to ensure it meets the requirements of the Storm Water Standards Manual. DCE completes the Storm Water Requirements Applicability Checklist (DS-560) to determine if the project is a PDP, SDP, or Exempt. If the project is a SDP, the ESD Deputy City Engineer is responsible for verifying that adequate site design and source control BMPs are included in the construction documentation in accordance with the Storm Water Standards Manual. If the project is a PDP, the ESD DCE is responsible for routing the project to PWD for review. The review of the project will then follow the procedures described in Section 4.3.2.

Public Utilities Department Projects

For projects designed and managed internally, the Public Utilities Department (PUD) is responsible for determining whether each proposed project is a PDP, SDP, or Exempt. If the project is a SDP, PUD is responsible for verifying that adequate site design and source control BMPs are included in the construction documentation in accordance with the Storm Water Standards Manual. If the project is a PDP, PUD is responsible for reviewing the SWQMP to ensure the project will meet all of the site design, source control, and structural pollutant control BMP requirements specified in the Storm Water Standards Manual. PUD is also responsible for determining whether the project is subject to hydromodification management requirements and reviewing any proposed structural hydromodification control BMPs. If PUD routes the project through PWD rather than reviewing it internally, the review will then follow the procedures described in Section 4.3.2.

Transportation & Storm Water Department Projects

The Transportation & Storm Water Department initiates minor public improvement projects such as sidewalks, roadway improvements and storm drain facilities. The Deputy City Engineer at the Division initiating the project is responsible for reviewing the project scope against the Storm Water Standards Manual requirements to determine if structural BMP requirements apply. This process begins with completing the Storm Water Requirements Applicability Checklist (DS-560) to determine if the project is a PDP, SDP, or Exempt. If the project is a PDP or SDP, the Senior Engineer is responsible for routing the project to PWD for review. The review of the project will then follow the procedures described in Section 4.3.2.

~~4.3.2.2~~4.3.3.2 Civic San Diego Projects

Civic San Diego is a city-owned non-profit organization that manages several development projects in urban neighborhoods. Civic San Diego projects are either submitted to DSD or PWD for final implementation. Projects initiated by a private developer are submitted to Civic San Diego Board for discretionary approval and subsequently obtain a construction permit from DSD. DSD staff handles these projects similar to other private development projects; they are subject to the same submittal and review procedures described in sections 4.3.1.

Projects initiated by Civic San Diego staff are handled as public improvement projects. They transfer to PWD for final design, bid & award and construction management, therefore, follow the standards and procedures described in section 4.3.2.

4.4 Inspection / Verification of New Structural BMPs

Verifying that structural BMPs are constructed per the approved SWQMP and construction plans is a critical component of the City's program. This procedure involves extensive

coordination between different City departments, divisions, and sections. A description of the procedure is provided below.

4.4.1 Private Development Projects

Three different City groups are responsible for inspecting private projects to verify proper installation and construction of structural BMPs. These groups include building inspectors from DSD's Division of Building/Construction and Safety, landscape inspectors from DSD's Land Development Review Division, and resident engineers from PWD's Field Engineering Division. The DSD civil engineering reviewer determines which inspection group or groups will be required to verify structural BMPs at a given project. This determination is made based on both the approval type (i.e. the type of permits for which the project is applying) and the types of structural BMPs proposed. The civil engineering reviewer updates the project record in the Project Tracking System (PTS) database to indicate which group or groups are required to verify the structural BMPs.

The identified group inspects the structural BMPs upon completion to confirm that they are installed or constructed per the approved development plans. This inspection is then recorded in the PTS database. The identified inspection group also collects a Permanent BMP Construction Self-Certification Form (Form DS-563) signed by the engineer of work, which indicates that the engineer certifies that the structural BMPs have been completed in accordance with the approved SWQMP and development plans. The identified inspection group also records receipt of Form DS-563 in the PTS database. Until the engineer of record signs and submits the DS-563 Form certifying the structural BMPs to the inspector, there is a Tier III hold in PTS. This prevents a project close out/final sign off until it is verified that all structural BMPs are constructed per plans and certified by the engineer of record.

4.4.2 Capital Improvement Program and other Public Projects

PWD's Field Engineering Division is responsible for verifying proper installation and construction of structural BMPs at all CIP projects, other public improvement projects and engineering permit projects to meet the Municipal Permit and Storm Water Standards Manual requirements. PWD established a Standard Operating Procedure, SOP-6.18 (Appendix XV), to ensure all structural BMPs are constructed in accordance with the project's approved SWQMP and construction plans. The SOP establishes an internal procedure that details storm water construction inspection and roles and responsibilities. Additionally, PWD and DSD developed a Memorandum of Understanding (MOU) for inspection of construction and structural BMPs (Appendix XXI). The MOU details the roles and responsibility of the departments' inspection staff to ensure all projects with structural BMPs are inspected to meet the Municipal Permit requirements. The SOP and MOU reflect

current staffing and procedures and may be updated regularly to reflect changes in the organization and/or processes; however, they will always meet the intent of the permit.

4.4.3 Enforcement

If a City inspector or resident engineer finds that a structural BMP has not been installed or constructed in accordance with the approved plans and SWQMP, he or she will utilize the enforcement mechanisms described in Sections 4.4.3.1 and 4.4.3.2 to ensure that the problem is corrected.

As required by Section E.6.c of the Municipal Permit, inspectors and resident engineers will ensure that all violations are corrected in a timely manner with a goal of correction within 30 days or prior to the next rain event, whichever is sooner. If more than 30 calendar days are required to achieve compliance, inspectors and resident engineers will record the rationale in an electronic record.

4.4.3.1 Enforcement for Private Projects

The primary enforcement mechanism for ensuring that structural BMPs are properly constructed at private sites is withholding project approvals. If the inspector or resident engineer finds that a structural BMP was not constructed or was constructed incorrectly, he or she will inform the contractor of the problem and require them to construct the BMPs in accordance with the approved plans. If the contractor does not correct the problem, the project will be denied final approval.

If necessary, escalated enforcement actions will be initiated by DSD's Code Enforcement Division. Escalated enforcement actions include Administrative Citations and Civil Penalties that may include fines for noncompliance.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of available escalated enforcement actions.

4.4.3.2 Enforcement for Capital Improvement Program and Other Public Projects

In the event that a resident engineer determines that a structural BMP has not been installed or has been installed or constructed incorrectly at a CIP or other public project, the resident engineer will withhold operational acceptance and will inform the contractor of the issue. If the contractor fails to correct the problem, the City may take escalated enforcement actions including Termination of Contract.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of available escalated enforcement actions.

4.5 Projects Records

The Municipal Permit requires the City to report annually on its development projects and provide the data requested per the Annual Report Form in Attachment D of the Permit. Development projects and public improvement project documents and records are essential to be maintained to provide the necessary data for the annual reporting and update the City's Structural BMP inventory to conduct maintenance verifications and inspections. Project Inventory and Tracking Forms are developed as an internal tool to facilitate record keeping and compilation of required data for the annual report. It is the responsibility of each department that reviews, approves and manages development projects or public improvement projects to develop, maintain, and update their own forms to track projects and maintain project records. The Storm Water Division will provide support to other departments to ensure the data tracked meets the reporting requirements.

4.5.1 Private Development Projects

DSD's Project Submittal and Management Division sends copies of Maintenance Agreements and construction plans (D-sheets) for all private PDPs to the Storm Water Division. The engineering staff at DSD uploads the accepted SWQMP to a shared site for Storm Water Division staff. The Storm Water Division then updates the EMIS database with the new project information from the Maintenance Agreements. After the DSD inspector or PWD Field Engineering Division (PWD-FED) resident engineer has verified construction or installation of the structural BMPs at a private project, he or she sends a copy of the signed Permanent BMP Construction Self-Certification (Form DS-563) to the Storm Water Division.

4.5.2 Public Projects

PWD is responsible for maintaining relevant storm water project documents and tracking required data in accordance with the procedures detailed in SOP-4.5.6 (Appendix V) and SOP-6.18 (Appendix XV).

4.6 Structural BMP Maintenance Verifications and Inspections

After structural BMPs are installed, the City takes measures to track these BMPs and to verify they are properly maintained and operating effectively. These activities apply to structural BMPs at both private projects and CIP projects.

4.6.1 Inventory Tracking

The Storm Water Division is responsible for conducting treatment control BMP maintenance verification activities, and it maintains its inventory of projects and BMPs in its Environmental Management Information System (EMIS) database. The Storm Water

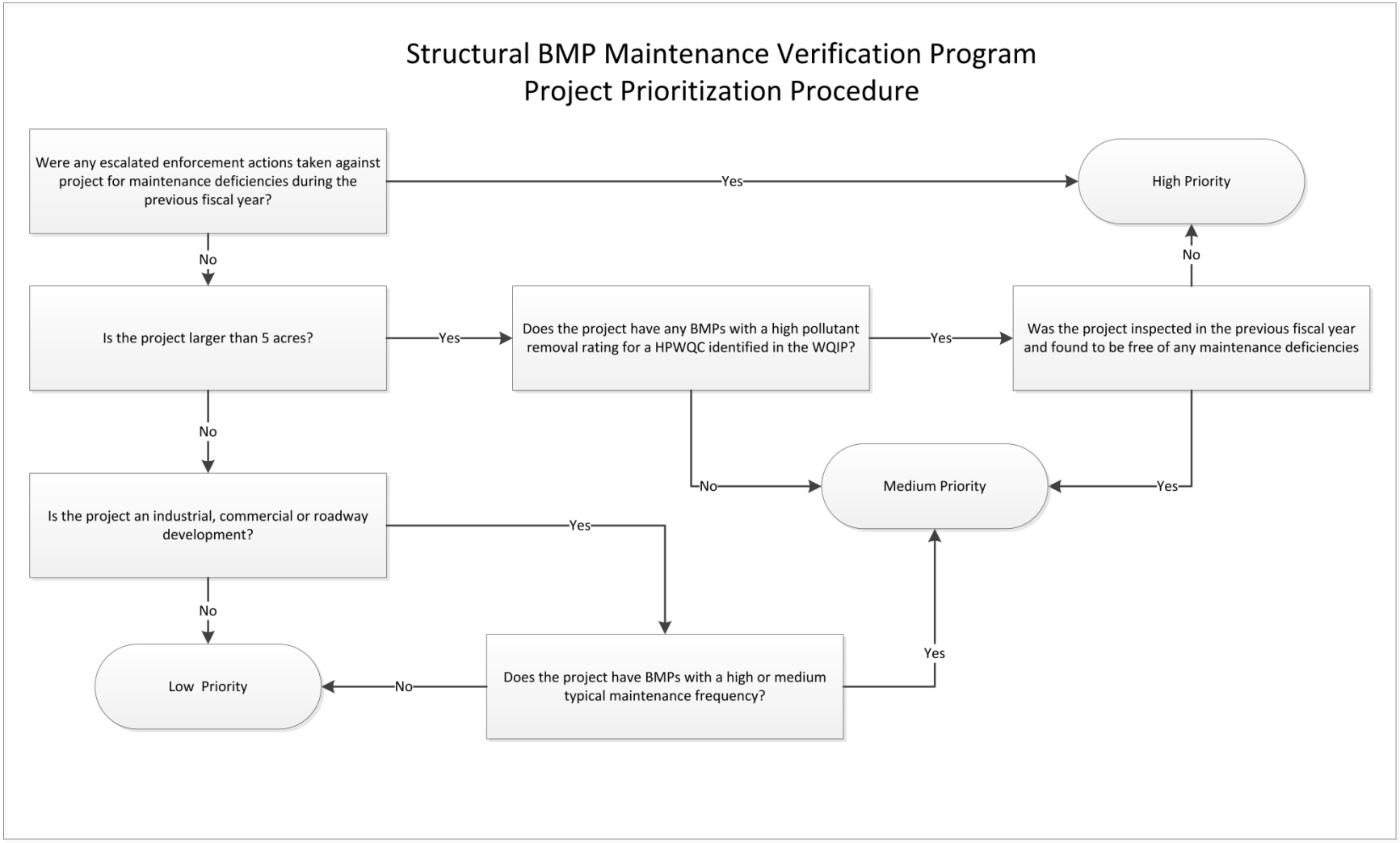
Division updates the inventory by uploading new projects to EMIS based on records received from other City departments of newly installed BMPs.

In accordance with Section E.3.e.(2).(a) of the Municipal Permit, the inventory includes the following project information:

- Project address
- Project hydrologic subarea
- Descriptions of treatment control BMPs at each project
- Dates of construction
- Party responsible for treatment control BMP maintenance
- Dates and findings of maintenance verification activities (inspections and mail-based verifications)
- Corrective actions and/or resolutions, when applicable

The Storm Water Division annually prioritizes the treatment control BMP maintenance verification inventory. The City updated its prioritization procedure in response to the new Municipal Permit. The new prioritization procedure was designed with the intention of assigning higher priorities to the projects with BMPs that have the greatest potential for providing significant reductions in pollutants identified as high priority water quality conditions in the WQIPs for each watershed. The complete prioritization procedure is presented in Figure 4-1.

Figure 4-1. Maintenance Verification Project Prioritization Procedure



4.6.2 Maintenance Verification and Inspections

The Storm Water Division is responsible for annually verifying that all structural BMPs on the inventory are being properly maintained. It performs this verification through two main activities: an annual maintenance verification mailing and a direct maintenance inspection program. These two activities are described in greater detail in the following sections.

4.6.2.1 Annual Maintenance Verification

Each year the Storm Water Division mails an Annual Maintenance Verification Form to the parties responsible for maintenance of structural BMPs. This form contains project-specific information, including a list of all the BMPs at the project and their locations. The responsible party is required to complete and sign the form, certifying that the structural BMPs for which they are responsible are being properly maintained. All returned Annual Maintenance Verification Forms are recorded in the Storm Water Division's EMIS database. Direct maintenance inspections will be performed at all projects that do not complete the Annual Maintenance Verification Form, regardless of the project's priority.

4.6.2.2 Maintenance Inspections

The Storm Water Division also verifies maintenance of structural BMPs by directly inspecting projects. Table 4-3 below presents the minimum percentages of projects that the City will inspect each year.

Table 4-3. Minimum Annual Project Inspection Percentages

Project Group	Percent Inspected Annually
High priority projects	100% (prior to the start of the rainy season)
All projects	20%

All high priority projects will be inspected prior to the rainy season, as required by the Municipal Permit. Medium and low priority projects will not require inspection if they have completed their Annual Maintenance Verification Form. However, many of these projects may still be inspected, since the City will annually inspect 20 percent of the projects on its inventory, and that number may include projects that may have already completed the Annual Maintenance Verification Form. The Storm Water Division uses its inspection activities both to verify BMP maintenance at projects that have not completed an Annual Maintenance Verification Form and to confirm the information reported by projects that have completed the form.

Maintenance inspections include examination of all structural BMPs at a project to verify that each structural BMP is working, being maintained properly, and is in compliance with all applicable City ordinances and permits. The first time a project is inspected by the

Storm Water Division, the inspector also obtains GPS coordinates of each structural BMP and records a narrative description of each BMP's location. While at a project site, inspectors will also attempt to verify that the Storm Water Division has the correct responsible party identified for the project and make any updates if necessary. The inspection findings and any updated BMP or responsible party information are all recorded in the EMIS database. If any maintenance deficiencies are found during an inspection, appropriate enforcement actions will be taken as described in the following section.

4.6.3 Enforcement

If an inspector finds maintenance deficiencies with any structural BMPs at a private or City-maintained site, he or she first attempts to explain the deficiencies and necessary corrective actions to the responsible party, if the responsible party is present. If the responsible party performs all necessary corrective actions promptly in response to the verbal explanation from the inspector, the case is closed, and the resolution is documented in the EMIS database. Otherwise, the Storm Water Division issues a Notice of Deficient Maintenance to the responsible party. The Notice of Deficient Maintenance lists all of the BMPs at the project that had maintenance deficiencies. It indicates the type and location of each BMP and describes the deficiencies observed by the inspector as well as the required corrective actions. Responsible parties are required to perform the corrective actions and submit photos or maintenance records that sufficiently demonstrate that all necessary maintenance activities were completed. Storm Water Division inspectors review the submitted photos or maintenance records. If the inspector deems the submittal sufficient, the case is closed, and the resolution is documented in the EMIS database. The inspector may also request additional documentation or perform a re-inspection at his or her discretion.

If a responsible party at a private project fails to sufficiently respond to a Notice of Deficient Maintenance by the response deadline, the Storm Water Division inspector may issue a Notice of Violation. If the responsible party still fails to perform the necessary corrective actions, the inspector may issue an Administrative Citation. Administrative Citations are considered an escalated enforcement action.

If the responsible party at a City-maintained project does not perform the necessary corrective actions in response to the Notice of Deficient Maintenance, department management from T&SW and the department responsible for maintenance will meet to resolve the issue promptly.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of available escalated enforcement actions.

Storm Water Division inspectors will ensure that all violations are corrected in a timely manner with a goal of correction within 30 days or prior to the next rain event, whichever is

sooner. If more than 30 calendar days are required to achieve compliance, inspectors will record the rationale in the EMIS database.

4.7 Education and Training

4.7.1 General Storm Water Training for New Employees

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

4.7.2 Activity Specific Training

This section describes activity-specific trainings provided by DSD, PWD, and T&SW's Storm Water Division. DSD, PWD, and T&SW will create, execute, and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 4-4. The Storm Water Division, Development and Construction Section provides support to other City departments with the development of training materials at their request and contingent upon available resources.

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

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.	Engineering Plan Review Staff	Ongoing
2. Training sessions on the updated Storm Water Standards requirements.	Engineering Plan Review Staff	Ongoing
3. Educate staff and ensure that the in-house standards for the review of	Engineering Plan Review Staff	Ongoing

Training Module/Item	Staff Level	Available
SWQMPs are followed.		
PWD		
4. 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; methods to minimize impacts to receiving waters from development, standard operating procedures, training plans, checklists and preparation of JRMP report.	Storm Water Task Force Members, Senior Engineers and Project Managers in Project Implementation and Design Divisions	Monthly
5. Train staff on storm water compliance requirements during planning and design per Training Plan prepared by Storm Water Task Force.	Storm Water Task Force Members, Senior Engineers, Project Managers and Assistant Engineers in Project Implementation and Design Divisions	As required in Training Plan
6. Formal Training Module on storm water compliance requirements during planning, design and construction phases of all CIP projects.	Project Managers, Designers, Environmental Section staff, Resident Engineers (Project Management Academy)	Annual
7. Storm water topics are discussed at the monthly meeting of resident engineers.	Resident Engineers	As needed
8. Treatment Control BMP Inspection requirements.	Resident Engineers	As needed
Storm Water Division		
9. Citywide training on new requirement of the updated Storm Water	City wide to employees involved in implementing requirements of this chapter	Prior to implementation of updated Storm Water

Training Module/Item	Staff Level	Available
Standards Manual.		Standards Manual

4.7.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Planning Department and DSD in consultation with the Storm Water Division (e.g., including the "Think Blue" logo on materials). Table 4-5 lists the activities, specific targeted communities, and availability.

Table 4-5. Department External Outreach Activities by Target Audience

Dept/Division Activity	Target Audience(s)*	Available
Planning Department		
Storm Water related information on Department Web site	1,4	Ongoing
DSD		
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
Holds quarterly coordination meetings with the construction industry with water quality as a standing topic.	1	Ongoing
Storm Water Division materials in business licenses and renewals.	2,3	Ongoing

* Denoted as follows:

1. Construction Site Owners and Developers
2. Industrial Owners and Operators
3. Commercial Owners and Operators
4. Residential Community, General Public, and School Children

4.8 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the JRMP annual report is due by October 31, 2015. Starting the following fiscal year, WQIP annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017). The Municipal Permit requires the City to report annually on development projects within its jurisdiction and provide the data requested per the Annual Report Form in Attachment D of the Permit.

Project Inventory and Tracking Forms are developed as an internal tool to facilitate record keeping and compilation of required expenditure data and JRMP activities for the annual report. At the beginning of each fiscal year, the Storm Water Division will provide support to PWD and DSD to update the internal annual reporting forms as necessary. It is the responsibility of each department or division that has a construction management/inspection role to develop, maintain, update their own forms to track projects and maintain project records. The Storm Water Division will provide support to other departments or divisions to ensure the data tracked meets the reporting requirements.

To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

4.9 Additional Water Quality Improvement Plan Strategies for the Storm Water Division

In addition to the JRMP strategies described in the preceding sub-sections, the Storm Water Division has identified additional BMPs, or strategies, to achieve water quality improvement goals in affected WMAs. The City has developed these strategies and included them in the City's six watershed-based WQIPs, as required by Section B.3 of the Municipal Permit. The Storm Water Division is responsible for implementing the additional strategies listed in Table 4-6. More information about the specific strategies listed below is available in JRMP Appendix XX, which is a table listing all the strategies from the City's six WQIPs. The WQIP strategies are subject to change and are contingent upon annual budget approvals and funding availability, and they will be modified through the adaptive management process as needed.

Table 4-6. Additional Development Planning Program WQIP Strategies

Strategy ID(s)	Strategy
CSD-JRMP-04*	Train staff on LID regulatory changes and LID practices.
CSD-JRMP-05*	Amend municipal code and ordinances, including zoning ordinances, to facilitate and encourage LID opportunities to support compliance with the MS4 Permit and TMDLs in a reasonable manner. Ensure consistency with the City of San Diego's BMP Design Manual. Update the Storm Water Standards Manual accordingly.

Strategy ID(s)	Strategy
CSD-JRMP-10*	Amend BMP Design Manual for trash areas. Require full four-sided enclosure, siting away from storm drains and cover. Consider the retrofit requirement.
CSD-JRMP-11*	Amend BMP Design Manual for animal-related facilities, such as such as animal shelters, "doggie day care" facilities, veterinary clinics, breeding, boarding and training facilities, groomers, and pet care stores.
CSD-JRMP-12*	Amend BMP Design Manual for nurseries and garden centers.
CSD-JRMP-13*	Amend BMP Design Manual for auto-related uses.
CSD-JRMP-14*	Offsite Alternative Compliance Option (WMAA)
CSD-NS-02	Investigation and research of emerging BMP technology.
CSD-NS-03	Approve and implement a green infrastructure policy.
CSD-NS-04	Create a manual that outlines right-of-way design standards.
CSD-NS-47	Coordinate with Development Services Department to prohibit introduction of invasive plants in new development and redevelopment projects.

* Strategies marked with an asterisk are considered “jurisdictional” in the MS4 Permit, but are considered enhancements to the JRMP to target highest priority water quality conditions.

5.0 Construction

5.1 Introduction

Construction and grading activities have the potential to adversely impact receiving waters due to the presence of pollutants on construction sites. The Regional Water Quality Control Board (RWQCB), San Diego Region Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit) requires the City to establish and implement a construction management program to control and reduce the discharge of pollutants from construction sites and entering the City's conveyance system. The Municipal Permit prescribes specific requirements related to construction management including inventory and tracking, implementation of construction best management practices (BMPs), inspection, enforcement, training and reporting. Table 5-1 details the requirement with reference to relevant permit sections.

Responsible Department(s), Branch(es), or Division(s):

- Engineering Division of the Development Services Department
- Building/Construction & Safety Division of the Development Services Department
- Engineering & Capital Projects Branch of the Public Works Department
- Environmental Services Department (Section 5.2.3.1 only)
- Engineering and Program Management Division of the Public Utilities Department (Section 5.2.3.2 only)
- Street Division of the Transportation & Storm Water Department (Section 5.2.3.3 only)
- Storm Water Division of the Transportation & Storm Water Department (Sections 5.2.3.3, 5.6, 5.7, 5.8)

Chapter 5 of the City's Jurisdictional Runoff Management Plan (JRMP) details roles and responsibilities of different City departments that perform construction management of any private development projects and public improvement projects to ensure the requirements of the Municipal Permit are met. The Development Services Department (DSD) and the Engineering and Capital Projects Branch of the Public Works Department (PWD) are the City groups primarily responsible for performing the activities described in this chapter. Other City departments such as the Public Utilities Department (PUD), the Environmental Services Department (ESD), Street Division and Storm Water Division of the

Transportation & Storm Water Department (T&SW) oversee minor public improvement construction projects.

The City's Storm Water Standards Manual establishes the minimum storm water construction requirements in accordance with the Municipal Permit. The updated Storm Water Standards Manual, that went into effect on February 16, 2016, is included in Appendix VII.

The Development and Construction Standards Section of the Storm Water Division, works closely and collaboratively with other City departments to incorporate their review, approval and inspection processes into the Storm Water Standards Manual to ensure successful implementation of the requirements through the review and approval process.

Table 5-1. Municipal Permit Requirements – Construction

JRMP Section	Municipal Permit Section	Requirement (Summary)
5.3	E.4. b.	Maintain, and update, at least quarterly, an inventory of construction sites within its jurisdiction, and identify sites that represent a high threat to downstream surface water quality.
5.4	E.4.c.	The City must implement, or require the year-round implementation of effective, site specific, seasonally appropriate, and construction phase appropriate BMPs to reduce discharges of pollutants in storm water from construction sites to the maximum extent practicable, and effectively prohibit non-storm water discharges from construction sites into the municipal separate storm sewer system (MS4).
5.2	E.4.a.	The City must ensure construction requirements are met through the project authorization or approval process prior to issuance of any local permit(s) that allows the commencement of construction projects that involve ground disturbance or soil disturbing activities that can potentially generate pollutants in storm water runoff.
5.5	E.4.d.	The City must conduct construction site inspections to require and confirm compliance with its local permits and applicable local ordinances, and the requirements of the Permit. Priority for site inspections must consider threat to water quality, as well as the nature of the construction activity, topography, and the characteristics of soils and receiving water quality.
5.6	E.4.e.	The City must enforce its legal authority established for all its inventoried construction sites, as necessary, to achieve compliance with the requirements of the Permit.
5.8	E.8., F. 3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

The JRMP activities described throughout the remainder of this chapter fulfill the requirements of the Municipal Permit listed in Table 5-1. These JRMP activities are also summarized and included as strategies in each of the City's six Water Quality Improvement Plans (WQIPs). Table 5-2 below identifies the applicable JRMP activity that have been identified as a WQIP strategy. This strategy is also included in Appendix XX of the JRMP.

Table 5-2. JRMP Strategies Identified in the WQIPs

Strategy ID	Strategy
CSD-JRMP-15	Administer a program to oversee implementation of temporary BMPs that control sediment and other pollutants during the construction phase of projects. Includes requirements to inspect at appropriate frequencies and effectively enforce requirements through process controlled by other City departments. The City will inspect BMPs for Surface Mining and Reclamation Act (SMARA) projects quarterly during dry seasons and monthly during wet seasons in order to help ensure effective BMPs are in place. As part of the grading permit approval process, projects will be tagged with the appropriate construction inspection frequency according to the site location. Mining operators will be required to submit annual reports to the State about the status of the mining operations. The City's SMARA lead also gets a copy of this report and when mining operations have ceased, will now direct the operator to obtain a Grading Permit to implement a Reclamation Plan. The City will inspect BMPs for SMARA projects quarterly during dry seasons and monthly during wet seasons in order to help ensure effective BMPs are in place. As part of the grading permit approval process, projects will be tagged with the appropriate construction inspection frequency according to the site location.

5.2 Projects Approval Process

The Municipal Permit requires the City to ensure the construction requirements are met through preparation of applicable construction BMP plans prior to issuance of any construction permits for private projects or authorization of construction activities for public improvements.

The Storm Water Standards Manual (Appendix VII) identifies the required Water Pollution Control Plan (WPCP) based on permit type and disturbed area. Additionally, the Storm

Water Standards Manual provides templates for the different WPCP types, to be followed as a guide.

5.2.1 Construction and Grading Approval Process for Private Projects

DSD - Engineering staff is responsible for plan check and issuance of construction permits for private development projects and Right of Way Permits for private entities within the City of San Diego jurisdiction. Staff reviewing projects and issuing permits ensures that projects prepare and submit the applicable construction BMP plan, in accordance with the Storm Water Standards Manual before construction permit issuance. Responsible staff verifies that projects subject to the State Water Resources Control Board Construction (SWRCB) General Permit, Order No 2009-0009-DWQ, as amended by Order No 2010-0014-DWQ and Order No 2012-0006-DWQ (CGP or Construction General Permit), have a Storm Water Pollution Prevention Plan (SWPPP) and obtain coverage under the CGP by recording the WDID number on the construction plans.

A Reclamation Plan approved under a Conditional Use Permit (CUP) for a mining operation cannot be implemented until the developer obtains a grading permit from the City. Any violation of this requirement is to be reported immediately to Code Enforcement. For future CUP's issued for mining projects, reviewers will impose conditions to specifically state that a Grading Permit will be required in order to implement the Reclamation Plan, and that SWPPP coverage under the Statewide Construction General Permit (CGP) will be required prior to grading activities.

5.2.2 Approval of Construction of Capital Improvement Program Projects

The Engineering and Capital Projects Branch of PWD is responsible for planning, design and construction of the City's Capital Improvement Program (CIP) projects. PWD is responsible for implementing applicable construction storm water requirements at all construction projects under its authority, to ensure compliance with the Municipal Permit and meeting the Storm Water Standards Manual requirements.

PWD is responsible for ensuring the applicable construction BMP plans (WPCP or SWPPP) for CIP projects and other public improvements are prepared and included in the construction documents prior to initiation of any construction activities. PWD developed a Standard Operating Procedure (SOP), SOP-6.18 (Appendix XV), which establishes an internal process that details storm water procedures for verification of applicable requirements, BMP plan review, construction inspection, inventory management, reporting, and relevant staff roles and responsibilities. The SOP reflects PWD current staffing and procedures and may be updated regularly to reflect changes in the organizational structural and process; however, it will always meet the intent of the permit.

5.2.3 Approval of Other City Construction Activities

As described in Section 4.3, select departments review their own public improvement projects to ensure that structural BMP requirements are met. These same departments must also ensure that construction BMP requirements for their projects are met.

5.2.3.1 Environmental Services Department Projects

The Deputy City Engineer in the Environmental Services Department (ESD) is responsible for determining which of their department's projects are routed through PWD for review. For all construction projects that are not routed through PWD, the Deputy City Engineer is responsible for verifying that the project has the proper construction BMP documentation (WPCP or SWPPP) as required by the Storm Water Standards Manual and that it has coverage under the CGP, if necessary.

5.2.3.2 Public Utilities Department Projects

The Public Utilities Department (PUD) determines which of their projects will be routed through PWD for review. For all construction projects that are not routed through PWD, PUD is responsible for verifying that the project has the proper construction BMP documentation (WPCP or SWPPP) as required by the Storm Water Standards Manual and that it has coverage under the CGP, if necessary.

5.2.3.3 Transportation & Storm Water Department Projects

Some construction projects initiated by T&SW, Street Division and Storm Water Division are not routed through PWD for review. Construction Projects are defined as 1) Replacement of an entire existing structure; or 2) Construction of new structures. For all T&SW construction projects that are not routed through PWD, a Civil Engineer and/or Public Works Superintendent from the responsible Division is responsible for verifying that the construction project has the proper construction BMP plan as required by the Storm Water Standards Manual and that it has coverage under the CGP, if applicable.

5.3 Construction Site Inventory Management

The Municipal Permit requires the City to maintain a ***watershed based inventory*** of all construction projects. The Permit prescribes a detailed list of project specific information/data that must be included in the inventory and updated quarterly, Permit Section E.4.b.

The City maintains its inventory of construction projects in two separate electronic databases. The inventory of private projects is divided based on approval type. PWD's Field Engineering Division (PWD-FED) maintains the inventory of all CIP projects and any private projects requiring grading or right of way permits. DSD- Inspection Services maintains the inventory of all other private construction projects. Each department will be updating its database, prior to the submittal deadline of the FY 2016 annual report, to capture the data required by Permit Section E.4.b.

5.3.1 Development Services Department Inventory Management

DSD-Building Construction & Safety Division maintains its watershed-based inventory of construction projects in its Project Tracking System (PTS) database. DSD's engineering reviewers continuously update the inventory by adding new projects to PTS when submitted to the City for plan check. The plan reviewer updates project status throughout the process and enters relevant construction information prior to permit issuance. Project priority (High, Medium, or Low) is assigned by engineering staff to each project, based on the matrix in the Storm Water Standards Manual and entered in PTS.

When construction permits are issued, projects are assigned to either DSD-Inspection Services or PWD-FED, based on permit type, for construction inspection. All construction inspections performed by DSD-inspection services staff are recorded in the PTS database.

5.3.2 Field Engineering Division Inventory Management

PWD is responsible for maintaining a watershed-based inventory of construction projects that meets the requirements of the Municipal Permit. PWD staff tracks the required project data and updates the database according to the procedures established in SOP 6.18 (Appendix XV).

5.4 Construction Site BMP Implementation

The Municipal Permit requires the City to implement, or require implementation of effective construction BMPs at all construction sites year round. The Municipal Permit requires implementation of BMPs in specific categories and the Storm Water Standards Manual (Appendix VII) establishes the minimum performance standards that must be met in each category.

It is the City's responsibility to ensure construction sites install and maintain effective construction BMPs through proper construction site inspection and follow-up actions as needed.

5.5 Site Inspection Process and Frequency

In accordance with the Municipal Permit, the City established, in the Storm Water Standards Manual (Appendix VII), minimum inspection frequencies based on construction site priority. The factors considered in determining site priority are detailed in the Storm Water Standards Manual and include high threat to water quality.

Table 5-3 Minimum Inspection Frequencies for Compliance Verification

Site Priority	Criteria	Rainy Season	Dry Season
ASBS	Projects located within the ASBS watershed	Weekly	Quarterly

High (High Threat to Water Quality)	Risk Level 2 & 3 LUP Type 2 & 3	Bi-weekly	Quarterly
Medium	Risk Level 1 (outside ASBS) LUP Type 1 (outside ASBS) WPCP projects within Peñasquitos WMA	Monthly	Quarterly
Low	All WPCP projects not determined to be Medium Priority	Quarterly	As-Needed

The City designates projects that represent a high threat to water quality with a "High" site priority to be inspected at least bi-weekly during the rainy season and quarterly during the dry season. The City has aligned the local definition of "high threat to water quality" to the risk determination approach of the CGP. The CGP determines risk level based on project specific sediment risk and receiving water risk, which addresses the required factors of the Municipal Permit, Section E.4.b.(2). The CGP provides that "a list of sediment sensitive waterbodies will be posted on the State Water Board's website". By using this tool for determining receiving water risk the City's approach will consistently be aligned with that of the SWRCB and if additional receiving waters become identified by the SWRCB as sensitive to sediment, then sites draining to those newly listed water bodies will be prioritized appropriately without a need to update the City's manual.

PWD and DSD developed a Memorandum of Understanding (MOU) for inspection of construction and structural BMPs (Appendix XXI). The MOU details the roles and responsibility of the departments' inspection staff to ensure all construction projects within the City's jurisdiction are properly inspected during construction to meet the Municipal Permit requirements.

The City will inspect BMPs for Surface Mining and Reclamation Act (SMARA) projects quarterly during dry seasons and monthly during wet seasons in order to help ensure effective BMPs are in place. As part of the grading permit approval process, projects will be tagged with the appropriate construction inspection frequency according to the site location. Mining operators will be required to submit annual reports to the State about the status of the mining operations. The City's SMARA lead also gets a copy of this report and when mining operations have ceased, will now direct the operator to obtain a Grading Permit to implement a Reclamation Plan.

5.5.1 Development Services Department Site Inspection Process

DSD-Building Construction & Safety Division is responsible for overseeing work performed on private properties within the City that require any a permit, including but not limited to building, mechanical, plumbing, electrical, gas, demolition, etc. Inspectors are assigned to a geographical district and perform thousands of inspections for issued permits within their district. Sites are also inspected at the request of another department or in response to

public complaints. As detailed in the Storm Water Standards Manual, some permit types do not warrant storm water construction inspection due to the minimum potential of generating pollutants. These projects generally do not involve grading or have minimal ground disturbance and are often indoors such as:

- Electrical Permit
- Fire Alarm Permit
- Fire Sprinkler Permit
- Plumbing Permit
- Sign Permit
- Mechanical Permit
- Spa Permit
- Individual Right of Way Permits that exclusively include the following activities: water service, sewer lateral, or utility service
- Right of Way Permits with a project footprint less than 150 linear feet that exclusively include of one of the following activities: curb ramp, sidewalk and driveway apron replacement, pot holing, geotechnical borings, curb and gutter replacement, and retaining wall encroachments

Private projects with Building permits or Demolition permits are inspected by DSD-Building Construction & Safety Division inspectors per the minimum required frequency described above based on the sites' priority rating. Inspectors record all of their storm water construction inspections in the PTS database. If there are no BMP deficiencies, the inspector notes: Pass on PTS; otherwise the inspector completes a Storm Water Notice (Form DS-3) and issues a copy to the contractor. The DS-3 allows inspectors to record descriptions of deficiencies, corrective measures required, and the date when corrective measures were implemented. Inspectors require that the contractor performs corrective measures within two days of the initial inspection or immediately when there is a high likelihood of rain in the forecast. If an inspector observes an active pollutant discharge from a construction site to the MS4, the inspector will immediately report the discharge to the T&SW Code Enforcement staff.

Inspectors accurately and thoroughly conduct storm water construction inspections to verify compliance with the Storm Water Standards requirements; accurately capture the required information on DS-3 and keep hard copy records of DS-3 and supporting documents.

5.5.2 Field Engineering Division Site Inspection Process

PWD is responsible for performing construction BMP inspections at sites with engineering permits and at all CIP projects in accordance with the Municipal Permit. PWD conducts storm water inspections according to the inspection frequency established in the Storm Water Standards Manual. Additionally, PWD staff conducts storm water inspections and

collects the required site information according to the procedures established in SOP 6.18 (Appendix XV) to ensure compliance with the Municipal Permit.

5.6 Construction Site Enforcement

To ensure compliance with the Municipal Permit and with the Construction Storm Water BMP Performance Standards, the City has established an enforcement process under the appropriate sections of the San Diego Municipal Code, which may include Sections 129.0101 through 129.0120 (General Construction Permit Authority and Procedures); Sections 142.0101 to 142.0150 (Grading Regulations); Sections 142.0201 to 142.0230 (Storm Water Runoff and Drainage Regulations); Sections 121.0201 through 121.0206 (Enforcement Authority for the Land Development Code); and Sections 121.0301 through 121.0316 (Violations of the Land Development Code and General Remedies).

If DSD or PWD-FED observes an illegal discharge at a construction site, they report the discharge to T&SW, and T&SW Code Enforcement Officers will conduct enforcement activities for discharges as described in Section 3.6.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of available escalated enforcement actions.

5.6.1 Private Development Projects

DSD is responsible for enforcing construction BMP inspections at all private development sites, except sites with engineering permits, in accordance with the Municipal Permit. DSD implements an enforcement process according to the procedures established in DSD Internal Inspection Procedures (Appendix XXIII). Additionally, DSD staff collects and tracks the required enforcement information according to the procedures established to ensure compliance with the Municipal Permit.

The City will inspect BMPs for SMARA projects quarterly during dry seasons and monthly during wet seasons in order to help ensure effective BMPs are in place. As part of the grading permit approval process, projects will be tagged with the appropriate construction inspection frequency according to the site location.

5.6.2 Public Projects

PWD is responsible for enforcing construction BMP inspections at sites with engineering permits and at all CIP projects in accordance with the Municipal Permit. PWD implements an enforcement process according to the procedures established in SOP-6.18 (Appendix XV). Additionally, PWD staff collects and tracks the required enforcement information according to the procedures established in SOP 6.18 to ensure compliance with the Municipal Permit.

5.6.3 Notification of Non-Compliant Sites

In accordance with Section E.6.e. of the Municipal Permit, the City will notify the RWQCB in writing within five calendar days of issuing escalated enforcement at a construction site that poses a significant threat to water quality as a result of violations or other non-compliance. The inspection group issuing the escalated enforcement action is responsible for notifying the RWQCB. Written notification may be provided to the appropriate RWQCB staff member by email.

Additionally, if a City inspector discovers that a construction site is required to have coverage under the CGP but has not filed a Notice of Intent, that inspector's group will notify the RWQCB of the violation within five calendar days from the time the City became aware of the circumstances. At minimum, the construction project location and name of owner or operator will be provided to the RWQCB. Written notification may be provided electronically by email to Nonfilers_R9@waterboards.ca.gov.

5.7 Education and Training

5.7.1 General Storm Water Training for New Employees

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

5.7.2 Construction Activity-Specific Training

This section describes activity-specific trainings provided by DSD and PWD Field Engineering Division. DSD and PWD Field Engineering Division will create, execute, and fund activity-specific training sessions that incorporate the minimum storm water BMPs in Table 5-4.

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

Activity	Staff Level	Schedule
DSD		
10. Staff trainings and 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.	Inspection Staff	Ongoing
11. Storm Water BMP annual training before the start of the rainy season.	Inspection Staff	Annual
PWD Field Engineering Division		
12. Storm water requirements training before the start of the rainy season.	Resident Engineers	Annual
13. General Storm water topics and issues are discussed at the monthly meeting of resident engineers.	Resident Engineers	As needed
14. Construction BMP topics such as Site BMP evaluations, Erosion Control, Sediment Control, Waste Management and Materials Pollution Control, Tracking Controls, Inspections and Documentation, Enforcement Policy, and Understanding BMP plans (SWPPP/WPCP).	Resident Engineers	As needed

5.7.3 Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the DSD in consultation with the T&SW Storm Water Division (e.g., including the "Think Blue" logo on materials). Table 5-5 lists the activities, specific targeted communities, and availability.

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

Activity	Target Audience(s)*	Available
PWD-Field Engineering Division		
AGC – QSD/QSP Training: City of San Diego storm water construction BMP Policies, inspection requirements, enforcement	1	As requested

Activity	Target Audience(s)*	Available
procedures.		
DSD		
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
Quarterly coordination meetings with the construction industry with water quality as a standing topic.	1	Ongoing
DSD (Building Inspection)		
At the first scheduled inspection, provide copy of a Storm Water Notice (DS-3) for informational purposes if there are no violations. This form provides information about storm water requirements for construction sites.	1-3	Ongoing
Storm Water Compliance Notice to Contractors from Director of DSD and PW, and Storm Water Clean Construction – Think Blue brochure, which advises about implementing proper BMPs at construction sites.	1-3	Ongoing

* Denoted as follows:
5. Construction Site Owners and Developers
6. Industrial Owners and Operators
7. Commercial Owners and Operators
8. Residential Community, General Public, and School Children

5.8 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the JRMP annual report is due by October 31, 2015. Starting the following fiscal year, WQIP annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, DSD and PWD develop a budget to track expenditures for implementing JRMP activities.

The Municipal Permit requires the City to report annually on construction projects within its jurisdiction and provide the data requested per the Annual Report Form in Attachment D of the Permit. The Storm Water Division will work collaboratively with other City departments or divisions to develop Project Inventory and Tracking Forms as an internal tool to facilitate record keeping, tracking expenditures and compilation of required data for the annual report. It is the responsibility of each department or division that has a construction management/inspection role to develop, maintain, and update their own forms to track projects and maintain project records. The Storm Water Division will provide support to other departments or divisions to ensure the data tracked for JRMP activities and expenditure meet the reporting requirements.

To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

6.0 Industrial and Commercial

6.1 Introduction

Principally, the City of San Diego (City) Transportation & Storm Water Department, Storm Water Division staff carries out the industrial and commercial section of the Jurisdictional Runoff Management Plan (JRMP). Other departments such as the Public Utilities Department, Wastewater Division, also conduct storm water inspections as part of their routine food establishment and industrial facility inspections to assist the Storm Water Division's efforts.

Responsible Department(s) or Division(s):

- Storm Water Division of the Transportation & Storm Water Department

Supporting Department(s) or Division(s):

- Office of the City Treasurer (supporting role for Section 6.2 only)
- Public Utilities Department, Wastewater Division

Storm Water Division staff members are responsible for performing storm water inspections of businesses throughout 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 Division Hotline (619-235-1000) or referrals from other departments within the City and County. Code Enforcement staff within the Storm Water Division respond to hotline calls about illicit discharges at businesses and, where necessary, take action to enforce the City's Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code Section 43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I). More information about the City's Storm Water Division Hotline and investigations in response to calls received is provided in Section 3 of the JRMP.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 6-1.

Table 6-1. Municipal Permit Requirements – Industrial/Commercial Facilities and Areas

JRMP Section	Municipal Permit Section	Requirement (Summary)
6.2	E.5.a.(1)(a)-(b), E.5.a.(2), E.5.a.(3)	The City must maintain, and update at least annually, a watershed-based inventory and map of the existing development within its jurisdiction that may discharge a pollutant load to and from the municipal separate storm sewer system (MS4; hereafter, "storm drain system"). The inventory must include the required descriptions listed in the Municipal Permit.
6.3	E.5.b.(1)(a) -(b), E.5.b.(1)(c)(i), E.5.b.(1)(d)	The City must designate a minimum set of best management practices (BMPs) required for all inventoried existing development, including special event venues. The City must also require the implementation, operation, and maintenance of BMPs by commercial areas and industrial facilities.
6.4.1	E.5.c.(1)(a)(iv)	The City must conduct inspections at frequencies as described in the Municipal Permit, e.g., annually perform onsite inspections of an equivalent of at least 20 percent of its inventoried existing development, inspect inventory at least once every five years.
6.4.2	E.5.c.(2)	Inspections performed by the City must satisfy the minimum inspection content requirements listed in the Municipal Permit.
6.4.3	E.5.c.(3)	The City must track all inspection and re-inspections. All inspection records must retain the minimum requirements listed in the Municipal Permit.
6.5	E.5.d.	The City must enforce its legal authority established for all its inventoried existing development, as necessary, to achieve compliance with the requirements of the Municipal Permit.

6.6	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

The JRMP activities described throughout the remainder of this chapter fulfill the requirements of the Municipal Permit listed in Table 6-1. These JRMP activities are also summarized and included as strategies in each of the City's six Water Quality Improvement Plans (WQIPs). Table 6-2 identifies the applicable JRMP activities that have been identified as WQIP strategies. These strategies are also included in Appendix XX of the JRMP.

Table 6-2. JRMP Strategies Identified in the WQIPs

Strategy ID	Strategy
CSD-JRMP-17	Administer a program to require implementation of minimum BMPs for existing development that are specific to the facility, area types, and PGAs, as appropriate. Includes inspection of existing development at appropriate frequencies and using appropriate methods.
CSD-JRMP-18	Update minimum BMPs for existing residential, commercial, and industrial development. Specific updates to BMPs include required street sweeping, catch basin cleaning, and maintenance of private roads and parking lots in targeted areas.
CSD-JRMP-20	Implement property based inspections.
CSD-JRMP-37	Require implementation of BMPs to address application, storage, and disposal of pesticides, herbicides, and fertilizers on commercial, industrial, and municipal properties. Includes education.

6.1.1 Background

Industrial facilities and commercial areas within the City's jurisdiction are included on the industrial and commercial inventory. Minimum Industrial and Commercial BMPs are required of all industrial facilities and commercial areas, as appropriate to site conditions and activities, detailed in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX). Inspection frequencies are implemented based on the pollution potential and threat to water quality of the facility and area, and as appropriate to confirm Minimum Industrial and Commercial BMP implementation and effectively prohibit non-storm water discharges to the storm drain system.

Each facility has the potential to discharge pollutants into the storm drain system and hence impact local water quality. As part of this program, pollution prevention methods will continue to be used as the primary mechanism for reducing business discharges of pollutants into regional storm drain systems. Often, this source-focused method is the

most cost effective and simple solution to reducing pollution. Inspections and enforcement procedures will continue to be conducted to verify compliance and, in some cases, to provide more site-specific direction for Minimum Industrial and Commercial BMP implementation.

Illicit discharges tend to be the major area of concern with mobile businesses. Due to the nature of their activities, mobile businesses will continue to be regulated differently than other commercial businesses. Mobile businesses can be difficult to identify because many do not have City business licenses. Additionally, new mobile businesses are started, and previously existing mobile businesses go out of business on a relatively regular basis. For the reasons listed above, and also simply because they are not consistently present at a fixed location, inspections of mobile businesses are conducted differently than stationary businesses.

6.2 Industrial and Commercial Source Inventory

The industrial and commercial development inventory is a watershed-based inventory of industrial facilities and commercial areas within the City's jurisdiction. The inventory consists of industrial and commercial development from the City Treasurer's business tax license list, State Water Resources Control Board (SWRCB) Storm Water Multiple Application and Report Tracking System (SMARTS), and commercial and industrial land use designations[2]. Every five years the existing land use is assessed, and the inventory is updated accordingly. The inventory is updated annually to account for new development identified through the business tax license list or SMARTS database.

Industrial facilities and commercial areas are inventoried by Parcel ID, as defined in the SANGIS Parcel layer. Parcel ID is a unique identifier assigned to parcel areas (a grouping of parcels or single parcel). The inventory will be maintained in the City's database, which is capable of storing APN(s) and business information (e.g., business name, address, contact) for enforcement tracking purposes. APN information is retrieved from the SANGIS Parcel layer and business information is retrieved from the business tax license database and SMARTS database. Business information may also be added to and/or updated in the database through inspection findings.

The inspection database, in conjunction with the inventory, provides a compliance history for each facility, and streamlines the allocation of resources for future inspection, enforcement, and outreach efforts. Per Section E.5.a of the Municipal Permit, the inventory will include the following information for each facility and area, as appropriate:

[2] Land use designations are based on the most readily available Land Use GIS datasets from SANGIS.

- Name and location (hydrologic subarea (HSA) and address).
- Classification as commercial or industrial.
- Status of facility as active or inactive.
- Identification of mobile businesses, where applicable.
- Standard Industrial Classification (SIC) and/or North American Industrial Classification System (NAICS) codes and associated description, which best reflects the principal products or services provided by each business, where applicable.
- SWRCB Industrial General Permit, Order No. 2014-0057-DWQ (IGP or Industrial General Permit) Notice of Intent (NOI) and/or Waste Discharger Identification (WDID) number, where applicable.
- Identification of pollutants generated and potentially generated by the facility or area.
- Whether the facility is adjacent to an environmentally sensitive area (ESA).
- Whether the facility or area is tributary to and within the same HSA as a water body segment listed as impaired on the Clean Water Act Section 303(d) List of Water Quality Limited Segments (303(d) list) and generates pollutants for which the water body segment is impaired.

An annually updated map showing the location of inventoried existing development, watershed boundaries, and water bodies is also maintained by the Storm Water Division.

6.2.1 Prioritization-Based Inspection Type Assignment

The Industrial and Commercial Inspection program will perform two inspection types, onsite inspections and parcel inspections. A parcel inspection is an inspection method (i.e., drive-by inspection) identified in Section E.5.c.(1)(a)(i) of the MS4 Permit. Every five years, the inventory is assessed, and each Parcel ID is assigned an inspection type. The inventory assessment prioritizes and assigns onsite inspections where the inspection will have the greatest potential to affect storm water and receiving water quality.

The assignment of an onsite inspection is based on criteria that evaluates water quality condition priorities, regulatory factors, and site-specific attributes. Specifically, criteria consider the Highest Priority Water Quality Conditions (HPWQCs) as identified by Water Quality Improvement Plans (WQIPs), potentially generated pollutants as determined by business type and activities, and whether the site is an industrial facility. The watershed management area-specific WQIPs are comprehensive, living documents that identify and prioritize water quality conditions based on best available receiving water and MS4 data, regulatory requirements, MS4 discharge potential to receiving water, and other sources and considerations. The onsite inspection criteria consider relevant and watershed-specific

water quality conditions, and known business and industrial activities to prioritize the inventory.

6.3 Best Management Practice Requirements

The implementation, operation, and maintenance of Minimum Industrial and Commercial BMPs by responsible parties of industrial facilities and commercial areas is required by the City in order to prevent pollutants from entering its storm drain system. The City has updated its Minimum Industrial and Commercial BMPs specific to industrial facilities and commercial areas, which are included in this JRMP as Appendix IX "Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources."

6.3.1 Additional Controls for Industrial and Commercial Businesses

Environmentally sensitive receiving waters within the City of San Diego are of special concern in terms of sensitivity to discharges from industrial facilities and commercial areas. If an industrial facility or commercial area is believed to be a significant source of other key pollutants and the standard Minimum Industrial and Commercial BMPs listed in Appendix IX are not adequate, the City will require additional structural or non-structural BMPs so that discharges of the key pollutants of concern will be reduced to the maximum extent practicable (MEP).

The City may also require such facilities or areas to prepare storm water pollution prevention plans (SWPPPs) and perform monitoring, even if they are not subject to the IGP.

The City also has programs to identify, prioritize, and implement potential projects to retrofit areas of existing development, including industrial and commercial areas, and to rehabilitate streams, channels, and habitat. The retrofit and rehabilitation programs are not part of the industrial and commercial inspection and enforcement program but instead are implemented through a variety of other avenues, as described in more detail in Appendix XIX of this JRMP.

6.4 Inspections

The Storm Water Division conducts a combination of onsite and parcel inspections of inventoried industrial facilities and commercial areas to ensure compliance with the established Minimum Industrial and Commercial BMPs and applicable local ordinances and permits, to reduce the discharge of pollutants in storm water to the MEP, and to effectively prohibit non-storm water discharges to the storm drain system.

In addition, the City has identified facilities in its municipal inventory that have activities closely aligned with those of industrial and commercial facilities, and will inspect them as part of the industrial and commercial inspection program. These facilities are classified as "municipal industrial" in the industrial and commercial development inventory.

Public Utilities Department Food Establishment Wastewater Discharge (FEWD) Program and Industrial Wastewater Control Program (IWCP) inspectors also conduct inspections at commercial and industrial sites, respectively, and share inspection results related to storm water with the Storm Water Division. In the event that high priority storm water issues are identified during the inspections conducted through these other programs, the facility will be referred to the Storm Water Division for any necessary follow-up action. Additionally, Storm Water Division staff report potential IGP non-filers to the RWQCB as described in more detail in Section 6.5.2 below.

6.4.1 Inspection Frequency

All industrial facilities and commercial areas are inspected at least once over 5-years. Annually, a number of onsite inspections are performed equating to at least 20% of the industrial and commercial development inventory. Industrial facilities and commercial areas will also be inspected in response to valid public complaints.

In addition, areas with a concentration of facilities identified as high priority due to an observed or potential detriment to the highest priority water quality concerns in their watershed will be targeted for additional focused efforts, which may include more frequent onsite inspection.

In accordance with the City's Final Compliance Plan for the La Jolla Area of Special Biological Significance (ASBS), the City will perform higher numbers of inspections at facilities that fall within the ASBS drainage area. Commercial areas will receive two inspections annually, both of which will occur during the rainy season. ~~once prior to, and once during, the rainy season.~~ Currently, no industrial facilities exist in the ASBS drainage area, however if an industrial facility were to begin operating in this area, they would receive inspections monthly during the rainy season.

6.4.2 Inspection Content

Parcel inspections will include, at a minimum:

- Visual inspections for the presence of actual non-storm water discharges,
- Visual inspections for the presence of actual or potential discharges of pollutants,
- Visual inspections for the presence of actual or potential illicit connections, and
- Verification that the description of the facility or area in the inventory has not changed.

On-site inspections will include, at a minimum:

- Assessment of compliance with applicable local ordinances and permits related to non-storm water and storm water discharges and runoff,

- Assessment of the implementation of applicable Minimum Industrial and Commercial BMPs,
- Verification of coverage under the IGP, when applicable, and
- Documentation of any problems or violations found, and subsequent follow-up action taken.

See Section 6.4.3.2 for additional details regarding follow-up activities, and Section 6.5 for enforcement details.

6.4.3 Inspection Methods and Tracking

Inspection type (i.e., onsite or parcel inspection) for each site is determined through an assessment process that considers a site's threat to water quality and potential to discharge pollutants that impact receiving water quality conditions. This inspection type assignment is reassessed every five years in order to account for changes in site activities, receiving water quality conditions and/or regulatory drivers.

On-site and parcel inspections are conducted by inspectors specifically trained in the application of storm water regulations. The following describes the general procedures that inspectors follow to conduct inspections.

Prior to visiting a facility, the inspector will typically access the electronic database and complete the general information portion of the Storm Water Compliance Inspection Form. The inspector will also typically review any applicable data, such as prior inspection history, inspection reports, photos, individual state issued permits, annual reports (for sites already known to maintain coverage under separate state permits), and the site specific SWPPP, where available.

For on-site inspections, inspectors will typically perform the following tasks:

- Obtain updated information (if any) for the City's electronic inspection database, including changes in ownership or operations.
- Verify facility operational details in order to verify or properly reassign the SIC and NAICS codes, if applicable.
- Evaluate the implementation of all applicable Minimum Industrial and Commercial BMPs, and any enhanced procedural or structural BMPs that the facility employs. This is completed by interviewing the facility representative, observing all outdoor areas and indoor areas that drain to outdoor areas, and reviewing pertinent storm water documents, such as the BMP plan and training records, as applicable.
- Observe all discharge points and storm water conveyance structures for evidence of illicit discharges or illicit connections.

- Check for coverage under the IGP, if applicable.
- Provide educational materials, as appropriate.
- Communicate inspection results and any necessary corrections to the appropriate responsible party(ies). Discuss the target timeline for corrections that cannot be made immediately.

For parcel inspections, inspectors will typically perform the following tasks:

- Identify if Parcel ID is an active commercial area or industry.
- Drive through property areas (e.g., parking lot, alley, back of building) at reasonable speeds (approximately 5 mph).
- Visually inspect outside areas for evidence of non-stormwater discharges, discharge of pollutants and illicit connections and/or discharges.
- If active discharges are observed, locate the appropriate responsible party(ies) on site and communicate necessary corrections. Discuss the target timeline for corrections that cannot be made immediately.
- If evidence of potential or previous discharges is observed, record findings in field form or online database. The case will be opened and earmarked for follow-up.
- Identify potential pollutants generated.

Inspections are tracked using the City's electronic database. Inspectors utilize one of two standard Storm Water Compliance Inspection Forms, to record either business or property inspection data, which are included in Appendix XI. The forms are also available on the Storm Water Division's online database, which can be used to enter data directly.

6.4.3.1 Mobile Business Inspections

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 and commercial inventory, notify them of Minimum Industrial and Commercial BMP requirements, inspect them on an as needed basis, and take enforcement actions when necessary. The most common triggers for these inspections are anticipated to be receipts of incident reports and direct visual observations by City staff or members of the public.

The mobile facilities known to operate within the City's jurisdiction are noted on the City's commercial inventory. The following business types are some of the more common types of mobile business in the City.

- Mobile vehicle washing
- Pest control services
- Mobile carpet, drape or furniture cleaning
- Mobile construction trades
  - Painting and coating
  - Cement mixing or cutting
  - Masonry
  - Other contractors
- Landscaping
- Pool and fountain cleaning
- Power washing services

6.4.3.2 Follow-Up Activities

City staff initiates follow-up actions immediately when high priority issues are identified during routine industrial and commercial facility inspections. Deficiencies and required corrections are detailed verbally by the inspector during the routine inspection with the responsible party(ies). If corrections can be completed immediately, the inspector will document the corrections made at that time. If additional time is needed, the target timeline is discussed with the responsible party(ies), with a goal of completing the corrections as soon as possible, but at minimum prior to the next forecast rain event, or within 30 calendar days, whichever is sooner.

If corrections cannot be made at the time of the routine inspection, the responsible party(ies) is instructed to provide documentation of corrections made, generally via photos or documents submitted via email or mail to the inspector. If this is not possible, or not appropriate due to the scope of the site or issue, the responsible party(ies) is instructed to notify the inspector when the corrections have been made in order to schedule a physical site re-inspection. All communications with the responsible party(ies), including re-inspection dates and results, rationale for departures from the target timeframe for corrections, and enforcement actions taken, are documented in the online database. Information from the database will be made available to RWQCB staff upon request. Throughout the follow-up process, inspectors provide education and guidance, and involve

other regulatory agencies, such as the RWQCB or County of San Diego Department of Environmental Health, as applicable.

The enforcement steps that may be taken to bring about compliance are detailed in Section 6.5.

Establishing good record keeping procedures during the inspection, follow-up, and enforcement process is critical. Inspection records are linked to the facility in the online database, so that records include all facility-specific data including the facility name and location (including address and HSA). Information specific to the inspection include the date of the routine inspection, and any re-inspections that are conducted, inspection findings and observations including issues or violations, a record of all follow-up or enforcement actions taken, and the date Minimum Industrial and Commercial BMP deficiencies or violations were resolved.

6.4.4 General Storm Water Training

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

Existing Storm Water Division inspection staff receive annual storm water refresher training. Training includes updates on applicable regulations, Minimum Industrial and Commercial BMP implementation, and pollutant analyses.

6.5 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit.

The City ensures that pollution prevention methods and Minimum Industrial and Commercial BMPs are implemented by enforcing its Storm Water Ordinance. City inspectors and enforcement officials properly document each observed violation at facilities failing to comply with storm water requirements, generally taking photographs, recording written accounts of observed conditions, and retaining copies of any pertinent documents as necessary.

If the City inspector or enforcement official observes a significant and/or immediate threat to water quality, such as an active illicit discharge, action will be taken to require the business owner and/or operator to immediately cease and correct the discharge or activity. For other types of deficiencies, a timeline is discussed with the responsible party(ies) in

order to bring about compliance within 30 calendar days, or prior to the next rain event, whichever is sooner. Written notification is provided to the inspected party following the inspection, detailing all deficiencies. The responsible party(ies) may provide compliance documentation or schedule a re-inspection as described in Section 6.4.3.2. If corrections cannot be verified within the target timeframe, a subsequent written notification is sent to the responsible party(ies) requiring response within a specified timeframe. Failure to respond or come into compliance within this timeframe, or a mutually agreed upon timeframe, appropriate to the scale of the corrections needed, will result in additional escalated enforcement action.

Escalated enforcement action is taken at the discretion of the City inspector or enforcement official, providing flexibility to apply the actions necessary to bring about compliance on a case-by-case basis. Depending on the severity of the violation, escalated enforcement actions can range from education to an Administrative Civil Penalty. Any fines issued are progressive, in consideration of any previous violations incurred. The case may also be turned over to the City Attorney's office for criminal or civil prosecution as a last resort, if necessary. See the Enforcement Response Plan in Appendix XIII for additional detail regarding escalated enforcement actions.

The City also maintains the authority to require businesses to prepare SWPPPs or to conduct sampling and analysis where deemed necessary.

6.5.1 Mobile Business Enforcement

Most violations associated with mobile businesses are anticipated to be related to illicit discharges. The City's enforcement approach to such discharges will require the discharge to be stopped and the area cleaned of discharged materials immediately upon discovery. Educational materials may also be provided to operators who are not aware of the City's storm water requirements. Businesses that do not possess the materials necessary to implement the required Minimum Industrial and Commercial BMPs will likely be required to demonstrate to the City that they have obtained such materials and can properly use them before the City allows such businesses to resume operations in the City. Mobile businesses that do not have City business licenses will be required to obtain them.

Escalated enforcement action is taken at the discretion of the enforcement official, providing flexibility to apply the actions necessary to bring about compliance on a case-by-case basis. Depending on the severity of the violation, escalated enforcement actions can range from education, to an Administrative Civil Penalty. Any fines issued are progressive, in consideration of any previous violations incurred. The case may also be turned over to the City Attorney's office for criminal or civil prosecution as a last resort, if necessary.

6.5.2 Identification of Industrial Non-Filers

Storm Water Division industrial and commercial inspection program staff review inspection data from industrial facilities on a regular basis throughout the year. All industrial facilities determined through this process to be potentially subject to the statewide IGP that do not have coverage under the IGP are considered potential non-filers. These businesses are reported to the RWQCB within five calendar days from the date that Storm Water Division staff identified the businesses as potential non-filers through the process described above. Written notification is provided electronically by email to Nonfilers_R9@waterboards.ca.gov unless otherwise agreed upon by Storm Water Division staff and the RWQCB. Where possible, Storm Water Division industrial and commercial inspection program staff also notify the business owner and/or operator of each potential non-filer of the IGP filing requirements, provide the owner/operator with a fact sheet that provides resources for further information as needed, and direct them to contact the RWQCB for further information about the IGP.

6.6 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the JRMP annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

6.7 Additional Water Quality Improvement Plan Strategies for the Storm Water Division

In addition to the JRMP strategies described in the preceding sub-sections, the Storm Water Division has identified additional BMPs, or strategies, to achieve water quality improvement goals in affected WMAs. The City has developed these strategies and included them in the City's six watershed-based WQIPs, as required by Section B.3 of the Municipal Permit. The Storm Water Division is responsible for implementing the additional

strategy listed in Table 6-3. More information about the specific strategy listed below is available in JRMP Appendix XX, which is a table listing all the strategies from the City's six WQIPs. The WQIP strategies are subject to change and are contingent upon annual budget approvals and funding availability, and they will be modified through the adaptive management process as needed.

Table 6-3. Additional Industrial and Commercial Program WQIP Strategy

Strategy ID(s)	Strategy
CSD-23	Implement property based inspections.

7.0 Municipal

7.1 Introduction

The City of San Diego (City) has over 10,000 employees, and contracts many more. Due to the City's organizational size and complexity, this chapter is organized into sub-sections according to City functions and services to help City departments understand their requirements and effectively implement the appropriate Minimum Municipal best management practices (BMPs). Each sub-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, a call-out box on the first page of each sub-section identifies the department(s) or division(s) responsible for the activities described in the sub-section. If and when reorganization occurs, some responsibilities may change. The Storm Water Division will inform the Regional Water Quality Control Board, San Diego Region (RWQCB) of any changes through the annual reporting process as they occur.

This Jurisdictional Runoff Management Plan (JRMP) replaces and expands upon the 2008 Jurisdictional Urban Runoff Management Plan. Major program changes applicable to municipal properties include the update of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), additional details regarding enforcement, and changes to the annual reporting schedule.

This JRMP will begin implementation on July 1, 2015. Updates to the JRMP will be included in the JRMP annual reports, which City departments submit to the Storm Water Division by an internally established data collection deadline each year. It is the responsibility of each department to secure the budget for all aspects of program implementation, including planning, implementation, construction, maintenance, education and training, and reporting for the JRMP, as applicable.

The following are guidelines to assist departments in the implementation of the elements of the JRMP that apply to each department:

1) Identify 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 storm water requirements, and ensuring data is tracked and reported to the Storm Water Division each year. This representative may represent the department during storm water audits by the federal United States Environmental Protection Agency (USEPA) and other agencies, and respond to storm water-related issues, such as notices of violation, that occur within the department. In addition, this representative will be the point of contact for their

department for the Storm Water Division, and will meet with the Storm Water Division as needed to coordinate on storm water issues.

2) Adopt JRMP (June 2015)

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

3) Distribute (June 2015)

After City Council approval of the JRMP, anticipated in June 2015, the next step is to distribute the JRMP to the affected divisions within the department with the appropriate transmittal requiring them to begin implementation. The department will make copies of the JRMP (or applicable sections) and distribute these to appropriate personnel.

4) Train/ Develop Awareness (Ongoing)

The department must schedule and ensure both the general storm water training for all personnel, and activity or department specific training for those personnel engaged in activities covered by the JRMP, are completed. The department must maintain records of the personnel trained so that the status of the training can be reported to the RWQCB.

5) Practice/ Implement (Ongoing)

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. The City's Storm Water Contract Language (Appendix VIII) must be incorporated into agreements for contracted services so that vendors will follow the same Minimum Municipal BMPs as the City.

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

Periodically, the department, along with the Storm Water Division, may 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 JRMP (Ongoing)

If as a result of any assessment or review of the department's activities, the practices and guidelines utilized by the department will require updates, including to the Minimum Municipal BMPs, the Storm Water Division will recommend changes to the department for review and co-approval. Once approved, the new guidelines will be incorporated into the department's JRMP section and policies and procedures and the JRMP will be updated per the procedure specified in the Storm Water Ordinance. The appropriate employee

awareness and training will be provided. Such changes will be reported by the Storm Water Division to the RWQCB through the annual reporting process.

8) Report (Ongoing)

The RWQCB Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), requires the City to report on its storm water activities annually. Departments are responsible for collecting information in anticipation of annual reporting, including training records. The Storm Water Division will compile the reports for all City departments and prepare the annual report to the RWQCB.

For fiscal year 2015, the JRMP annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan (WQIP) annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, each municipal department must track their expenditures for implementing JRMP activities. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses in an internal reporting form and submit it to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination. The Storm Water 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 the JRMP. The inspections will check what practices and policies have been adopted and implemented so that the general effectiveness of the JRMP in instilling practices to reduce pollutants in urban runoff can be assessed. Inspections will take place once prior to the rainy season (in September), and once during the rainy season (between January and April). 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 Division staff will be available to assist in addressing issues.

Additional voluntary self-inspections and re-inspections, performed by department staff, should be held as frequently as necessary to assess program effectiveness and ensure proper implementation of Minimum Municipal BMPs. Occasional spot inspections by Storm Water 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 RWQCB and USEPA staff.

The Storm Water Division will coordinate with the departments to verify the implementation of Minimum Municipal BMPs, and the completion of two annual inspections. Enforcement of the City's Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code Sections 43.0301 to 43.0312) (Appendix I) is the responsibility of the Storm Water Division.

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 Division each year as part of the proof that the City is doing its part to reduce pollutants in storm water and urban runoff.

7.1.1 Connection to Water Quality Improvement Plans

In addition to the JRMP update, the Municipal Permit also requires developing WQIPs for the six WMAs in which the City has jurisdictional area. The City has worked collaboratively with other agencies in those WMAs to develop six WQIPs. In each WQIP, the City has identified numeric goals, strategies to achieve the goals, and associated timelines that apply to the City. Two general types of strategies are included in the WQIPs: strategies that describe the baseline level of activity required by the Municipal Permit (JRMP strategies) and, where necessary to meet numeric goals, additional, enhanced strategies. The JRMP strategies applicable to the municipal chapter of the JRMP are listed in Table 7-1, below:

Table 7-1. JRMP Strategies Identified in the WQIPs

Strategy ID	Strategy
CSD-JRMP-23	Implementation of operation and maintenance activities (inspection and cleaning) for MS4 and related structures (catch basins, storm drain inlets, channels as allowed by resource agencies, detention basins, pump stations, etc.) for water quality improvement and for flood control risk management.
CSD-JRMP-27	Implement additional BMPs in coordination with Master Maintenance Plan Enhancements
CSD-JRMP-28	Proactively repair and replace municipal separate storm sewer system (MS4) components to provide source control from MS4 infrastructure.
CSD-JRMP-29	Replacement of hard assets.
CSD-JRMP-30	Coordinate with other City departments (PUD) to implement controls to prevent infiltration of sewage into the MS4 from leaking sanitary sewers.
CSD-JRMP-32	Implement operation and maintenance activities for public streets, unpaved roads, paved roads, and paved highways.

The departments or divisions identified as responsible for implementing activities described in sub-sections 7.3.1 through 7.3.15 will implement the above JRMP strategies, as applicable, in the course of carrying out their baseline compliance responsibilities as described in these JRMP sub-sections. The Storm Water Division is responsible for the additional, enhanced WQIP strategies that apply to the municipal component of the JRMP. Enhanced WQIP strategies are described in sub-section 7.3.16. Appendix XX of this JRMP provides the full list of all the City's WQIP strategies.

7.2 Municipal Inventory

The Municipal Facilities Inventory is provided as Appendix II.A. This inventory includes all City owned and operated buildings, such as libraries, operations yards, water treatment facilities, police, fire and rescue stations, and recreation centers, as well as public parks, open space areas, landfills, and other City facilities. Municipal facilities whose operations are closely aligned with those of industrial and commercial businesses have been identified as such in the inventory to clarify where additional inspections may be warranted. Municipal infrastructure, including MS4 (hereafter, "storm drain system") or sewer system structures or pipelines, roads, and parking lots, are identified in the Municipal Infrastructure Inventory in Appendix II.B.

7.3 Best Management Practice Requirements and Implementation

The Minimum Municipal BMPs mirror the Minimum Industrial and Commercial BMPs, to ensure consistency across the City. The Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources have been updated to reflect practices that address the City's highest priority water quality conditions designated in the WQIP for each respective WMA. Specific implementation of the Minimum Municipal BMPs is detailed in the following subsections by municipal department, division, or activity, as appropriate. The following subsections also include department, division, or activity specific training, inspection, education, enforcement, discharge notification, and reporting procedures, as appropriate.

7.3.1 Airports

This section is applicable to the City of San Diego (City) 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 goal of this section is to reduce the impact of Airports Division activities on storm water quality and provide guidance for the protection of water quality and receiving waters.

Responsible Department(s) or Division(s):

- Airports Division of the Real Estate Assets Department

This section contains the Minimum Municipal best management practices (BMPs) implemented by the Airports Division, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting applicable to the Airports Division. Airports Division facilities are listed in the Municipal Facilities Inventory in Appendix II.A.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.1-1.

Table 7.3.1-1 Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.1.1	E.5.b.	Implement and maintain BMPs.
7.3.1.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.1.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.1.3	Attachment B.1.l.(6)	Report pollutant discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") or receiving waters.
7.3.1.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.1.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for Airports Division facilities and activities are listed in Table 7.3.1-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the Airports Division engages in. If future activities are begun by the Airports Division that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.1-2. Airports Division Minimum Municipal BMPs

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **Airports Division BMP Implementation:** No illicit connections are known to exist on municipal facilities. Any suspected illicit connections discovered by municipal staff will be reported to the "Think Blue" Hotline for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **Airports Division BMP Implementation:** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 11, below.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**Minimum Municipal BMP:** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **Airports Division BMP Implementation:** When hangar floor washing occurs, wash water is either vacuumed up by the cleaning machine, or collected in French drains and sump-pumped to the sewer. Wash water is never discharged outside of the building or to the storm drain system. Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**Minimum Municipal BMP:** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **Airports Division BMP Implementation:** Aircraft are washed where parked by outside contractors. Where possible, dry cleaning methods are encouraged. Contract language requires dry wiping of any oily areas of the vehicle prior to washing, minimal use of cleaning products, containment of the wash area using berms and/or liners, vacuuming up all wash water and residual pollutants, and the protection of any nearby storm drain inlets using booms and mats, as necessary. Waste products are removed from the site by the contractor for disposal.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**<u>Minimum Municipal BMP:</u>** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **<u>Airports Division BMP Implementation:</u>** Where sprinkler systems are used, regular maintenance and visual observation of the irrigation system is performed to prevent overspray, leaks, and other problems that could result in runoff to City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. If rain is forecast, sprinklers are temporarily shut off to prevent water waste and runoff from saturated landscaped areas. Irrigation time periods and volumes are adjusted as needed to prevent oversaturation. When watering by hand, the amount of water applied is carefully controlled to prevent irrigation runoff. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed. During maintenance activities, soil and water are prevented from entering the storm drain system. After digging out a line, all soil is returned to the hole and compacted. The area is swept to remove any remaining soil. When bailing out an area after a line break, muddy water is discharged onto a pervious area.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
9	Control air conditioning condensation discharges.	**<u>Minimum Municipal BMP:</u>** Air conditioning condensation discharges shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>Airports Division BMP Implementation:</u>** For existing buildings, all condensate lines shall be discharged to the sanitary sewer where feasible. Where not feasible, air conditioning condensation discharges that would otherwise reach the City's storm drain system shall be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Landscaped areas should be at least five feet away from a building, and the landscaped area should slope away from buildings. For new development or building remodels, all condensate lines shall be connected to the sanitary sewer. If air conditioning and chiller units are treated with descaling or anti-algal agent, all flushing agent residues are disposed of properly, and the condensate line is bypassed while flushing unit. When heating, ventilating, and air conditioning (HVAC) condenser tubes are flushed, water is captured and disposed of properly. If chemicals are used, ESD-HMMP is contacted for disposal options.
11	Eliminate floor mat cleaning discharges.	**<u>Minimum Municipal BMP:</u>** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **<u>Airports Division BMP Implementation:</u>** Floor mats are cleaned offsite by an outside contractor.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
13	Regularly clean and maintain structural BMPs and LID installations, to ensure proper performance.	**Minimum Municipal BMP:** BMPs installed, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **Airports Division BMP Implementation:** The Airports Division is responsible for the inspection and maintenance of any treatment control BMPs, or structural BMPs, on Airports Division properties. These installations are inspected, and maintained where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**Minimum Municipal BMP:** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **Airports Division BMP Implementation:** All unpaved areas on Airport facilities with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
Good Housekeeping		
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning, the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>Airports Division BMP Implementation:</u>** Parking lots, runways, and driveways are swept every two months by an outside contractor, for whom compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Curbs are swept by hand, and blowers are used to remove debris and sediment from under cars and other difficult to reach areas, then vacuum sweepers remove all debris. This process ensures that the entire parking lot, runway, and driveway areas are cleaned during each event.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**Minimum Municipal BMP:** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **Airports Division BMP Implementation:** The Airports Division is responsible for the inspection and maintenance of any storm drain inlets or building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on Airports Division properties. These structures are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **Airports Division BMP Implementation:** Trash and debris are picked up around airport grounds, including trash and recycling containers and dumpsters, daily. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and placed in dumpsters.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **Airports Division BMP Implementation:** Liquids are stored within hangars and buildings where they will not drain to outdoor areas in the event of a spill or leak. This requirement is included in the contract language for all entities occupying hangar space.
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **Airports Division BMP Implementation:** Hazardous materials are stored within hangars and buildings where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. This requirement is included in the contract language for all entities occupying hangar space. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **Airports Division BMP Implementation:** Materials that are a potential source of pollutants should not be stored outdoors. In the event that a special circumstance, such as construction activities, requires outdoor storage, materials will be stored in a manner that prevents contact with storm water including placing materials out of the path of runoff, or diverting runoff around storage areas, and providing appropriate cover if rain is forecast. Materials will be checked on a regular basis to verify the structural BMPs (such as roofs, awnings, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **Airports Division BMP Implementation:** Hazardous materials are labeled with the material and include additional information as required by other agencies.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
Pesticide and Fertilizer Management		
22	Properly manage pesticides and fertilizers.	**<u>Minimum Municipal BMP:</u>** Pesticides and fertilizers shall be applied in strict accordance with manufacturer's label, as authorized by U.S. Environmental Protection Agency. Chemicals shall be stored safely in covered and contained areas. Waste products shall be disposed of in accordance with the manufacturer's label and applicable hazardous waste regulations. The use of integrated pest management principles is encouraged to reduce or eliminate use of chemicals. SDMC §43.0307(a). **<u>Airports Division BMP Implementation:</u>** No pesticides are applied on Airport properties. Fertilizers are applied very rarely. When applied, fertilizers are used as directed, and applied by hand to the target area. If any spill were to occur outside the target area, the product would be removed immediately. Herbicides are applied as needed, up to three times per year to control growth in the areas immediately surrounding the runway, by an outside contractor, for whom compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Fertilizers and herbicides are not applied if there is a 40% or greater chance of rain.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
		Planning
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**<u>Minimum Municipal BMP:</u>** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **<u>Airports Division BMP Implementation:</u>** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for Airport facilities.
		Outdoor Work Areas
24	Implement controls to minimize pollution from exposed outdoor work areas.	**<u>Minimum Municipal BMP:</u>** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **<u>Airports Division BMP Implementation:</u>** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, “Storm Water Contract Language.” Minor pieces of equipment used in airport operations

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
		maintenance is taken to City-approved vendors for repair when needed. Aircraft maintenance is performed in hangars, where feasible. Where not feasible, the following precautions are taken, as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows into onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**<u>Minimum Municipal BMP:</u>** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **<u>Airports Division BMP Implementation:</u>** Vehicles and equipment are routinely monitored for leaks, and serviced immediately if necessary. If vehicles or equipment are leaking, drip pans located within hangars are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **Airports Division BMP Implementation:** Spill cleanup kit materials, including absorbents, mats, and booms are located within hangars and Airport facilities, appropriate for response to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill and calling the Storm Water Division of the Transportation & Storm Water Department to assist with cleanup procedures. Emergency phone numbers are posted in a visible place with the spill kit.
28	Immediately clean up spills.	**Minimum Municipal BMP:** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **Airports Division BMP Implementation:** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept,

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
		shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area until the spill response staff, is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**<u>Minimum Municipal BMP:</u>** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **<u>Airports Division BMP Implementation:</u>** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.
Training and Education		
30	Provide pollution prevention signage for storm drains.	**<u>Minimum Municipal BMP:</u>** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **<u>Airports Division BMP Implementation:</u>** All municipal storm drain inlets located on City owned parcels managed by the Airport Division are labeled with "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue", via installed medallions. Medallion placement is checked annually during routine inspections, and if necessary, replaced before September 30 of each year.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**Minimum Municipal BMP:** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **Airports Division BMP Implementation:** The system used by the Airports Division may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.
32	Train appropriate employees on storm water pollution prevention.	**Minimum Municipal BMP:** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **Airports Division BMP Implementation:** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the Airports Division annually, to include training on the implementation of all components of the applicable BMP Plan. In addition, the Airport facilities are subject to the State Water Resources Control Board Industrial General Permit, Order No. 2014-0057-DWQ (IGP or Industrial General Permit), and a member of a compliance group. As such, training specific to IGP SWPPP implementation is conducted annually for crew members, biannually for key personnel, and teleconferences are conducted twice per year with the group leader for applicable updates.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **Airports Division BMP Implementation:** Trash and debris are removed throughout Airport facilities daily through pickup or sweeping activities, including around dumpsters, to ensure all areas remain free of loose litter, debris, liquids, powders, and sediment. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.
34	Properly store and dispose of green waste.	**Minimum Municipal BMP:** Green waste shall be properly stored and disposed of such that it will not be transported to the storm drain system by storm water or non-storm water runoff. SDMC §43.0307(a). **Airports Division BMP Implementation:** Green waste is collected and placed into dumpsters after regular landscape maintenance activities. Periodically, green waste dumpsters are rented from the Environmental Services Department in anticipation of larger landscape maintenance projects, so the wastes will be disposed of to the green waste section of the landfill. Landscape activities are scheduled to occur during dry weather, where feasible. Temporary green waste dumpsters are placed away from storm drains and concentrated flow paths, and covered in the event of rain.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
35	Manage animal waste and animal washing in a manner that prevents transport of wastes and wash water off-site.	**Minimum Municipal BMP:** Animals and animal waste shall be managed and stored in a manner that prevents animal supplies, waste, and wash water from entering the storm drain system. Collect and dispose of animal waste through trash receptacles or the sanitary sewer, as appropriate. SDMC §43.0307(a). **Airports Division BMP Implementation:** Any pet owners bringing their animals onto Airport facilities will be instructed to clean up after their pets and dispose of all wastes properly to the trash. Signage will be posted in areas that are frequented, to serve as a reminder, in the event that verbal and/or written notification is not sufficient.
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **Airports Division BMP Implementation:** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.

BMP ID[1]	BMP Title	Airports Division Minimum Municipal BMPs
37	Cooking oil waste shall be managed to prevent illicit discharges.	**Minimum Municipal BMP:** Waste cooking oil shall be managed in a manner that prevents discharges. SDMC §43.0307(a). **Airports Division BMP Implementation:** Restaurants on Airport facilities will be instructed to utilize indoor waste cooking oil bins where appropriate facilities exist to maintain compliance with health, fire, and other applicable department codes. Where indoor facilities are incompatible with such codes, waste containers shall be kept within a covered and/or contained area to prevent residual waste transport in runoff. The chosen storage option (cover, containment, or both) shall be sufficient to prevent the discharge of any storm water that has contacted any residual waste oil on the bin or surrounding areas. This means that overhead cover is sufficient to prevent any storm water contact with the bin, the containment is of a high enough capacity to retain all storm water that has contacted the bin, or both in conjunction will prevent any discharge of residual waste oil, even during heavy rains and/or windy conditions. Areas surrounding the waste container that are not covered or contained shall be kept free of residual waste oil. Any oil spilled in outdoor areas during grease transport or collection activities will be cleaned immediately, in accordance with Minimum Municipal BMP 28.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water Division is responsible for developing and providing all new employee trainings. All new City staff will receive a basic introduction to storm water issues via a "Storm Water and You" training module presented at the "New Employee Orientation".

Airports Division Specific Training

The Airports Division will create, execute, and fund training sessions, detailed in Table 7.3.1-3, that cover the implementation of the Minimum Municipal BMPs in Table 7.3.1-2.

The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.1-3. Airports Division-Specific Minimum Municipal BMP Training(s)

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

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 Division (e.g., including the "Think Blue" logo on materials). Table 7.3.1-4 lists the activities, specific targeted communities, and the anticipated schedule.

Table 7.3.1-4. Department External Outreach Activities by Target Audience

Activity	Target Audience(s)*	Schedule
1. Ensure Commercial Operating Permits (COPs) contain language to inform permittees of the regulations from the City Airports and other controlling agencies concerning acceptable activities and the applicable Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources. Permittees will be notified of any potential fines for failing to comply with the regulations.	3	Current COPs are issued with applicable Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources regarding their activity on the airport.
2. 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 completed as part of SWPPP implementation .
3. Inform all new development they must comply with industry standards for SWPPPs and measures to comply with State and local requirements.	3	Currently completed as part of SWPPP implementation .

* Denoted as follows:

1. Industrial Owners and Operators
2. Construction Site Owners and Developers
3. Commercial Owners and Operators
4. Residential Community, General Public, and School Children

7.3.1.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.1-5, 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 7.3.1-5. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

Additionally, facilities within the Airports Division inventory whose activities are closely aligned with those of industrial or commercial businesses have been identified. The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility. These facilities are denoted within the municipal facility inventory, provided as Appendix II.A.

7.3.1.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the Airports Division will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the Airports Division will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, the Airports Division will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.1.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.2 Buildings/Parking/Landscaping

This section is primarily applicable to the City of San Diego (City) Public Works Department, Facilities Maintenance Division, Library Department, and the Office of the City Treasurer. The Purchasing & Contracting Department plays a supporting role by ensuring that agreements with vendors that provide contracted operations and maintenance services include the City's standard language (Appendix VIII). The standard contract language requires the vendors to comply with the Jurisdictional Runoff Management Plan (JRMP), including compliance with applicable best management practices (BMPs) from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX).

The City of San Diego currently owns over 1,600 buildings, parking lots, parking structures, and landscaped areas that are located in areas potentially exposed to storm water. The goal of this section is to reduce the impact on storm water quality of department or division operations and maintenance activities in these areas and provide guidance for the protection of water quality and receiving waters. This section contains Minimum Municipal 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. The facilities related to the operations and maintenance of buildings, parking areas, and landscaped areas are listed in the Municipal Facilities Inventory; see Appendix II.A. In addition, the Facilities Maintenance Division performs structural repairs, as needed, for the City-owned "Portland Loo" restroom locations.

Responsible Department(s) or Division(s):

- Facilities Maintenance Division of the Public Works Department Library Department
- Office of the City Treasurer

Supporting Department(s) or Division(s):

- Purchasing & Contracting Department

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit and Permit), as described in Table 7.3.2-1.

Table 7.3.2-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A; Appendix II.B	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.2.1	E.5.b.	Implement and maintain BMPs.
7.3.2.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.2.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.2.3	Attachment B.1.l.(6)	Report pollutant discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") or receiving waters.
7.3.2.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.2.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for facilities and operation and maintenance activities for buildings, parking areas, and landscape areas are listed in Table 7.3.2-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the respective department or division engages in. If future activities are begun by the department or division that are not covered by the BMPs below, the applicable Minimum Municipal BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.2-2. Buildings/Parking/Landscaping Minimum Municipal BMPs

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **Buildings/Parking/Landscaping BMP Implementation:** No illicit connections are known to exist on municipal facilities. Any suspected illicit connections discovered by municipal staff will be reported to the "Think Blue" Hotline for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **Buildings/Parking/Landscaping BMP Implementation:** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 11, below.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**<u>Minimum Municipal BMP:</u>** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Any water from processing activities, such as tile cutting, is contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite. If necessary, solids are allowed to settle out prior to disposal, and solids are disposed of to a solid waste dumpster.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**<u>Minimum Municipal BMP:</u>** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Municipal vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
5	Properly dispose of water from fire sprinkler maintenance activities.	**<u>Minimum Municipal BMP:</u>** Fire sprinkler system discharges containing corrosion inhibitors, fire suppressants, or antifreeze shall be disposed through the sanitary sewer system, not the storm drain system. Fire sprinkler system discharges without corrosion inhibitors, fire suppressants, or antifreeze shall be disposed through the sanitary sewer, if practicable. When not practicable to discharge to the sanitary sewer system, the water shall not be discharged unless adequate precautions have been taken to prevent the transport of pollutants to the storm drain system. SDMC §43.0304 & §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Where maintenance is performed by municipal staff, fire sprinkler system effluent is discharged to the sanitary sewer. Where maintenance is performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language."

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**<u>Minimum Municipal BMP:</u>** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Where maintenance is performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Where sprinkler systems are used, regular maintenance and visual observation of the irrigation system is performed to prevent overspray, leaks, and other problems that could result in runoff to City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. If rain is forecast, sprinklers are temporarily shut off to prevent water waste and runoff from saturated landscaped areas. Irrigation time periods and volumes are adjusted as needed to prevent oversaturation. When watering by hand, the amount of water applied is carefully controlled to prevent irrigation runoff. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed. During maintenance activities, soil and water are prevented from entering the storm drain system. After digging out a line, all soil is returned to the hole and compacted. The area is swept to remove any remaining soil. When bailing out an area after a line break, muddy water is discharged onto a pervious area.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
9	Control air conditioning condensation discharges.	**<u>Minimum Municipal BMP:</u>** Air conditioning condensation discharges shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** For existing buildings, all condensate lines shall be discharged to the sanitary sewer where feasible. Where not feasible, air conditioning condensation discharges that would otherwise reach the City's storm drain system shall be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Landscaped areas should be at least five feet away from a building, and the landscaped area should slope away from buildings. For new development or building remodels, all condensate lines shall be connected to the sanitary sewer. If air conditioning and chiller units are treated with descaling or anti-algal agent, all flushing agent residues are disposed of properly, and the condensate line is bypassed while flushing unit. When HVAC condenser tubes are flushed, water is captured and disposed of properly. If chemicals are used, ESD-HMMP is contacted for disposal options.
11	Eliminate floor mat cleaning discharges.	**<u>Minimum Municipal BMP:</u>** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Floor mats are cleaned offsite by an outside contractor.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
13	Regularly clean and maintain structural BMPs, including LID installations, to ensure proper performance.	**<u>Minimum Municipal BMP:</u>** BMPs installed, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** The Department or Division responsible for the operation of the facility is responsible for the inspection and maintenance of any treatment control BMPs, or structural BMPs, on their properties. These installations are inspected, and maintained where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**<u>Minimum Municipal BMP:</u>** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** All unpaved areas on facilities with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
		Good Housekeeping
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Paved parking lots, roads, and driveways maintained by the Storm Water Division of the Transportation & Storm Water Department are swept at least once per year, and City yards are swept once per month. See Section 7.3.14 for additional details. Where departments or divisions maintain their own paved facilities, sweeping occurs at least once per year. In either case, the entire impervious surface is swept during each sweeping event. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**Minimum Municipal BMP:** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **Buildings/Parking/Landscaping BMP Implementation:** The Department or Division responsible for the operation of the facility is responsible for the inspection and maintenance of any storm drain inlets or building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on their properties. These structures are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **Buildings/Parking/Landscaping BMP Implementation:** Trash and debris are picked up around municipal building, parking, and landscaped areas, including trash and recycling containers and dumpsters, as needed to keep them free of accumulated debris. This is completed on up to a daily frequency for high use areas. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and placed in dumpsters for disposal. Good housekeeping practices are implemented for onsite activities, which include cleaning any outdoor work areas throughout, and immediately following the activity. See Minimum Municipal BMP 24 for additional details regarding outdoor work areas.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor area.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **Buildings/Parking/Landscaping BMP Implementation:** Liquids are stored within buildings or other secondary containment structures where they will not drain to outdoor areas in the event of a spill or leak.
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **Buildings/Parking/Landscaping BMP Implementation:** Hazardous materials are stored within buildings, or within secondary containment and cover, where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system. **Buildings/Parking/Landscaping BMP Implementation:** Materials that are a potential source of pollutants should not be stored outdoors. In the event that a special circumstance, such as construction activities, requires outdoor storage, materials will be stored in a manner that prevents contact with storm water including placing materials out of the path of runoff, or diverting runoff around storage areas, and providing appropriate cover if rain is forecast. Materials will be checked on a regular basis to verify the structural BMPs (such as roofs, awnings, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **Buildings/Parking/Landscaping BMP Implementation:** Hazardous materials are labeled with the material and include additional information as required by other agencies.
Pesticide and Fertilizer Management		
22	Properly manage pesticides and fertilizers.	**Minimum Municipal BMP:** Pesticides and fertilizers shall be applied in strict accordance with manufacturer's label, as authorized by U.S. Environmental Protection Agency. Chemicals shall be stored safely in covered and contained areas. Waste products shall be disposed of in accordance with the manufacturer's label and applicable hazardous waste regulations. The use of integrated pest management principles is encouraged to

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
		reduce or eliminate use of chemicals. SDMC §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** City employees in approved classifications who apply pesticides must be licensed pesticide handlers. These employees are trained in the proper storage, handling and disposal of pesticides. Where outside contractors are used, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Pesticide applications are based on the recommendations of a licensed Pest Control Advisor. Fertilizers and pesticides are applied sparingly, directly to the intended area, and in accordance with manufacturer's directions as approved by the USEPA, at times when rain is not predicted and irrigation is not scheduled. Any pesticides or fertilizers that are spilled, or fall outside their intended area, are removed immediately and thoroughly. Where possible, integrated pest management methods are used, including: No controls, physical/mechanical controls, environmental controls (mulching, pest-resistant vegetation, prescribed burns), biological controls (predators, parasites, etc.), less toxic chemical controls (e.g., soaps and oils) and/or hot water. Where chemical controls are necessary, the least toxic chemicals that will do the job (e.g., biodegradable products) are used. Pesticides and fertilizers are applied and handled, in accordance with existing state regulations (California Title 3, Division 6, Pesticides and Pest Control Operations), and detailed records are kept. Unused chemicals are collected and disposed of as a regulated waste. Pest control application procedures are reviewed annually, and conform to the current San Diego County Department of Agriculture regulations.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
		Planning
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **Buildings/Parking/Landscaping BMP Implementation:** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for buildings, parking, and landscaping area activities.
		Outdoor Work Areas
24	Implement controls to minimize pollution from exposed outdoor work areas.	**Minimum Municipal BMP:** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **Buildings/Parking/Landscaping BMP Implementation:** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential,

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
		Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Minor pieces of equipment used in operations and maintenance are taken to City-approved vendors for repair when needed. All activities are performed indoors where feasible, such as pre-painting items, or cutting activities. Where not feasible, the following precautions are taken, as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows into onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles or equipment.	**<u>Minimum Municipal BMP:</u>** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Municipal vehicles and equipment are monitored daily for leaks, and taken to the fleet services vehicle maintenance facility or a City approved equipment repair vendor immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste. See Section 7.3.15 for additional details regarding vehicle maintenance.
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**<u>Minimum Municipal BMP:</u>** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms are located in close proximity to liquid storage locations, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill and calling the Storm Water Division. Emergency phone numbers are posted in a visible place with the spill kit.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
28	Immediately clean up spills.	**<u>Minimum Municipal BMP:</u>** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's "Think Blue" Hotline at 619-235-1000. Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept, shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area until the spill response staff, is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
		spill internally, or delegate cleanup responsibilities to the citywide hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**Minimum Municipal BMP:** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **Buildings/Parking/Landscaping BMP Implementation:** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
		Training and Education
30	Provide pollution prevention signage for storm drains.	**<u>Minimum Municipal BMP:</u>** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** All municipal storm drain inlets located on City owned parcels are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue" by the property managing department. Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**<u>Minimum Municipal BMP:</u>** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** The system used may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**<u>Minimum Municipal BMP:</u>** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by individual division or department annually, to include training on the implementation of all components of the applicable BMP Plan.
	Waste Management	
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**<u>Minimum Municipal BMP:</u>** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **<u>Buildings/Parking/Landscaping BMP Implementation:</u>** Trash and debris are picked up around municipal building, parking, and landscaped areas, including trash cans and dumpsters, weekly to keep them free of accumulated debris. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
34	Properly store and dispose of green waste.	**Minimum Municipal BMP:** Green waste shall be properly stored and disposed of such that it will not be transported to the storm drain system by storm water or non-storm water runoff. SDMC §43.0307(a). **Buildings/Parking/Landscaping BMP Implementation:** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Green waste is generally collected and placed into dumpsters after regular landscape maintenance activities, or used onsite as mulch or a soil amendment. Green waste dumpsters may also be rented from the Environmental Services Department in anticipation of larger landscape maintenance projects, so the wastes will be disposed of to the green waste section of the landfill. Landscape activities are scheduled to occur during dry weather, when feasible. Temporary green waste dumpsters or piles are placed away from storm drains and concentrated flow paths, and covered in the event of rain.
35	Manage animal waste and animal washing in a manner that prevents transport of wastes and wash water off-site.	**Minimum Municipal BMP:** Animals and animal waste shall be managed and stored in a manner that prevents animal supplies, waste, and wash water from entering the storm drain system. Collect and dispose of animal waste through trash receptacles or the sanitary sewer, as appropriate. SDMC §43.0307(a). **Buildings/Parking/Landscaping BMP Implementation:** Signs and/or waste collection stations are placed in public areas where pet waste is noted to accumulate. Animal wastes are also removed, bagged, and placed into waste receptacles during regular facility housekeeping activities, in accordance with Minimum Municipal BMP 17, above.

BMP ID[1]	BMP Title	Buildings/Parking/Landscaping Minimum Municipal BMPs
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **Buildings/Parking/Landscaping BMP Implementation:** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water Division is responsible for developing and providing all new employee trainings. All new City staff will receive a basic introduction to storm water issues via a "Storm Water and You" training module presented at the "New Employee Orientation".

Building/Parking/Landscaping-Specific Training

The departments or divisions responsible for the operation and maintenance of City-owned buildings, parking areas, and landscape areas will create, execute, and fund training sessions, detailed in Table 7.3.2-3, that cover the implementation of the Minimum Municipal BMPs in Table 7.3.2-2. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.2-3. Buildings/Parking/Landscaping-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Painting (Oil or Water Based)	Supervisor, Crew	Ongoing
Dry Wall and Stucco Work	Supervisor, Crew	Ongoing
Concrete and Asphalt Work	Supervisor, Crew	Ongoing
storm drain system Inspection and Cleaning	Supervisor, Crew	Ongoing

Training Module/Item	Staff Level	Schedule
Refuse Dumpsters	Supervisor, Crew	Ongoing
Material Loading and Unloading	Supervisor, Crew	Ongoing
Materials Handling, Storage, and Disposal	Supervisor, Crew	Ongoing
Ponds and Fountains Maintenance	Supervisor, Crew	Ongoing
Roof Vents and Equipment Maintenance	Supervisor, Crew	Ongoing
HVAC, Chillers and Refrigerators Maintenance	Supervisor, Crew	Ongoing
Boiler Maintenance	Supervisor, Crew	Ongoing
Cooling Tower Maintenance	Supervisor, Crew	Ongoing
Fire Sprinkler Flushing	Engineer (Project Officer)	Ongoing
Installation and Removal of Parking Meters	Supervisor, Crew	Ongoing

Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the departments or divisions responsible for the operation and maintenance of City-owned buildings, parking areas, and landscape areas in consultation with the Storm Water Division (e.g., including the "Think Blue" logo on materials). Table 7.3.2-4 lists the activities, specific targeted communities, and the anticipated schedule.

Table 7.3.2-4. Department External Outreach Activities by Target Audience

Activity	Target Audience(s)*	Schedule
Library Department/Office of City Treasurer/Customer Service Department		
"Think Blue" Brochure available in lobby information rack	1-4	Ongoing
"Think Blue" "3 C's" handout available in lobby information rack	1-4	Ongoing
"Think Blue" Flyer insert in Business Tax Renewal mailing	3	Ongoing

* Denoted as follows:
5. Industrial Owners and Operators
6. Construction Site Owners and Developers
7. Commercial Owners and Operators
8. Residential Community, General Public, and School Children

7.3.2.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.2-5, 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 7.3.2-5. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

Additionally, the buildings, parking areas, and landscape areas on the municipal inventory whose activities are closely aligned with those of industrial or commercial businesses have been identified. The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility. These facilities are denoted within the municipal facility inventory, provided as Appendix II.A.

7.3.2.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the department or division will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the department or division will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, the department or division will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.2.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the JRMP annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.3 City-Owned Leased Properties

This section is applicable to the City of San Diego (City) 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 language that READ will include within lease agreements requiring compliance with the Minimum BMPs for Residential, Commercial, Industrial, and Municipal Sites/Sources (Appendix IX), in addition to inventory, inspection, pollutant discharge reporting, education, and reporting requirements.

Responsible Department(s) or Division(s):

- Real Estate Assets Department

READ manages an array of City-owned leased properties that may include commercial, industrial, agricultural, or residential uses operating onsite. Although READ manages these leases, the lease-holding entities are managed according to the same procedures applied to activities conducted on private property. For example, commercial or industrial businesses operating on City-owned properties through READ leases are included on the Industrial/Commercial Inventory (Appendix IV) and regulated through the City's industrial and commercial education, inspection, and enforcement program (Jurisdictional Runoff Management Plan (JRMP) Section 6.0, "Industrial and Commercial").

Additionally, industrial, commercial, or residential READ facilities are included in the corresponding inventories as appropriate.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.3-1.

Table 7.3.3-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
6.2; 8.2; Appendix II.A	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
6.3; 8.3; Appendix IX	E.5.b.	Implement and maintain BMPs.
6.4; 8.4.1	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
6.5; 8.4.7; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
6.4; 8.4.2.2	Attachment B.1.l(6)	Report pollutant discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") or receiving waters.
6.6; 8.5	E.8., F.3.b.(3)	Track and submit data for Water Quality Improvement Plan Annual Reports, and track and report estimated fiscal year budget expenditures.

7.3.3.1 Methods to Implement Minimum Residential, Industrial, and Commercial BMPs

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:

"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 San Diego Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code Sections 43.0301 to 43.0312).

Therefore, LESSEE shall, at a minimum, implement and comply, as applicable, with the Minimum Residential BMPs adopted under the San Diego Municipal Code Section 43.0307(a).

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."

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 San Diego Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code Sections 43.0301 to 43.0312).

Therefore, LESSEE shall, at a minimum, implement and comply, as applicable, with the Minimum Industrial and Commercial BMPs adopted under the San Diego Municipal Code Section 43.0307(a).

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."

BMPs for Agricultural Leases

During agricultural 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 San Diego Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code Sections 43.0301 to 43.0312).

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."

General Storm Water Training

The Storm Water Division of the Transportation & Storm Water Department 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". Staff that do not participate in the "New Employee Orientation" (e.g. seasonal, part-time, etc.) will receive general storm water training as part of their employee orientation within their department.

Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the READ in consultation with the Storm Water Division (e.g., including the "Think Blue" logo on materials). Table 7.3.3-2 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 7.3.3-2. Department External Outreach Activities by Target Audience

Activity	Target Audience(s)*	Schedule
1. Include Storm Water requirements 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

* Denoted as follows:
1. Industrial Owners and Operators
2. Construction Site Owners and Developers
3. Commercial Owners and Operators
4. Residential Community, General Public, and School Children

7.3.3.2 Inspection Procedures

Industrial, commercial, and residential READ facilities are inspected through the industrial and commercial, or residential, inspection programs, as applicable. See sections 6.4 and 8.4.1 for additional details. Agricultural lands leased by READ are regulated and inspected at the discretion of the State of California through the Irrigated Lands Regulatory Program.

7.3.3.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Ordinance. Enforcement actions for READ facilities are taken by the Storm Water Division as necessary; see sections 6.5 and 8.4.7 for additional details. Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

7.3.3.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the JRMP annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.4 Environmental Services

This section is applicable to the City of San Diego (City) Environmental Services Department (ESD) which operates and manages the collection, reduction, and disposal of solid waste within the City. Services provided by ESD include the collection of refuse and recyclable wastes, solid waste and hazardous waste code enforcement activities at the landfill, and educating the public and businesses on recycling options. Additionally, ESD is responsible for operating and maintaining the Miramar Landfill and eight inactive landfills.

ESD also oversees and runs the Household Hazardous Waste (HHW) Program. The HHW Program includes measures 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 sanitary sewer system, the ground, and the municipal separate storm sewer system (MS4; hereafter, "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.

Responsible Department(s) or Division(s):

- Environmental Services Department

Both the City and the private sector provide collection services for HHW. In 1999, a permanent household hazardous waste transfer facility was opened at the Miramar Landfill and now serves residents with weekly HHW disposal services. Additionally, 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.

The fiscal responsibility for the diversion of HHW is equally shared by the ESD (for diversion from the landfill), the Storm Water Division of the Transportation & Storm Water Department (for diversion from the ground and storm water), and Public Utilities Department (PUD) Environmental Monitoring and Technical Services (for diversion from the sanitary 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.

The goal of this section is to reduce the impact of ESD's activities on storm water quality and provide guidance for the protection of water quality and receiving waters. This section contains the Minimum Municipal BMPs implemented by ESD, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements applicable to the ESD.

ESD facilities are listed in the Municipal Facilities Inventory; see Appendix II.A.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.4-1.

Table 7.3.4-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.4.1	E.5.b.	Implement and maintain BMPs.
7.3.4.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.4. 3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.4.3	Attachment B.1.l.(6)	Report pollutant discharges to the storm drain system or receiving waters.
7.3.4.4	E.8., F.3.b(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.4.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for ESD facilities and activities are listed in Table 7.3.4-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the ESD engages in. If future activities are begun by the ESD that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.4-2. ESD Minimum Municipal BMPs

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **ESD BMP Implementation:** No illicit connections are known to exist on ESD facilities. Any suspected illicit connections discovered by ESD staff will be reported to the Storm Water Division Hotline at 619-235-1000 for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **ESD BMP Implementation:** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 11, below.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**Minimum Municipal BMP:** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & §43.0307(a). **ESD BMP Implementation:** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**Minimum Municipal BMP:** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **ESD BMP Implementation:** Municipal vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**<u>Minimum Municipal BMP:</u>** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **<u>ESD BMP Implementation:</u>** Where maintenance is performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Where sprinkler systems are used, regular maintenance and visual observation of the irrigation system is performed to prevent overspray, leaks, and other problems that could result in runoff to City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. If rain is forecast, sprinklers are temporarily shut off to prevent water waste and runoff from saturated landscaped areas. Irrigation time periods and volumes are adjusted as needed to prevent oversaturation. When watering by hand, the amount of water applied is carefully controlled to prevent irrigation runoff. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed. During maintenance activities, soil and water are prevented from entering the storm drain system. After digging out a line, all soil is returned to the hole and compacted. The area is swept to remove any remaining soil. When bailing out an area after a line break, muddy water is discharged onto a pervious area.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
8	Properly dispose of discharges from swimming pools, spas, fountains, reflective pools, ponds, and filter backwash.	**Minimum Municipal BMP:** Swimming pools, spas, fountains, reflective pools, ponds, and filter backwash water shall be properly disposed of to prevent pollutants from entering the storm drain system. SDMC §43.0304 & §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **ESD BMP Implementation:** Fountain maintenance is performed by facility staff. All water is discharged to landscaping when maintenance occurs.
11	Eliminate floor mat cleaning discharges.	**Minimum Municipal BMP:** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **ESD BMP Implementation:** Floor mats are cleaned by facility staff, using a vacuum. All wastes are disposed of appropriately to the trash. Wet cleaning is not performed.
13	Regularly clean and maintain structural BMPs and Low Impact Development (LID) installations, to ensure proper performance.	**Minimum Municipal BMP:** BMPs installed, including LID and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **ESD BMP Implementation:** The ESD is responsible for the inspection and maintenance of any treatment control BMPs, or structural BMPs, on ESD properties. These installations are inspected, and maintained where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**<u>Minimum Municipal BMP:</u>** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **<u>ESD BMP Implementation:</u>** Other than active working areas and top decks of the landfills, all unpaved areas on ESD facilities with the potential for erosion have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. Mulch is used on exposed soil at landfills. In the event that any pervious or impervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
Good Housekeeping		
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>ESD BMP Implementation:</u>** Paved parking lots, roads, and driveways maintained by the Storm Water Division are swept at least once per year, and City yards are swept once per month. See Section 7.3.14 for additional details. Where ESD maintains their own paved facilities, sweeping occurs at least once per year. In either case, the entire impervious surface is swept during each sweeping event. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**Minimum Municipal BMP:** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **ESD BMP Implementation:** The ESD is responsible for the inspection and maintenance of any storm drain inlets or building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on ESD properties. These structures are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **ESD BMP Implementation:** Trash is picked up around ESD grounds, including trash and recycling containers and dumpsters, as needed to keep them free of accumulated debris. This is completed on up to a daily frequency for high use areas. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and placed in dumpsters for disposal. Good housekeeping practices are implemented for onsite activities, which include cleaning any outdoor work areas throughout, and immediately following the activity. See Minimum Municipal BMP 24 for additional details regarding outdoor work areas.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **ESD BMP Implementation:** Liquids are stored within buildings or other secondary containment structures where they will not drain to outdoor areas in the event of a spill or leak.
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **ESD BMP Implementation:** Hazardous materials are stored within buildings, or within secondary containment and cover, where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **ESD BMP Implementation:** Materials stored at the landfill are placed on pervious ground, away from the path of runoff, and hydrologically contained by a collection pond, where storm water flows are retained. Collected water is reused onsite for dust control purposes. Hazardous materials are provided with appropriate cover and containment to prevent material contact with rainwater and any runoff. Materials will be checked on a regular basis to verify the structural BMPs (such as roofs, awnings, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **ESD BMP Implementation:** Hazardous materials are be labeled with the material and include additional information as required by other agencies.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
Pesticide and Fertilizer Management		
22	Properly manage pesticides and fertilizers.	**Minimum Municipal BMP:** Pesticides and fertilizers shall be applied in strict accordance with manufacturer's label, as authorized by U.S. Environmental Protection Agency. Chemicals shall be stored safely in covered and contained areas. Waste products shall be disposed of in accordance with the manufacturer's label and applicable hazardous waste regulations. The use of integrated pest management principles is encouraged to reduce or eliminate use of chemicals. SDMC §43.0307(a). **ESD BMP Implementation:** No pesticides or fertilizers are applied on ESD properties. Instead, integrated pest management methods are used, including: No controls, physical/mechanical controls, environmental controls (mulching, pest-resistant vegetation, prescribed burns), biological controls (predators, parasites, etc.), less toxic chemical controls (e.g., soaps and oils) and/or hot water.
Planning		
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **ESD BMP Implementation:** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for ESD Facilities.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
Outdoor Work Areas		
24	Implement controls to minimize pollution from exposed outdoor work areas.	**<u>Minimum Municipal BMP:</u>** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **<u>ESD BMP Implementation:</u>** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Minor pieces of equipment used in ESD operations maintenance are taken to City-approved vendors for repair when needed. All activities are performed indoors where feasible, such as pre-painting items, or cutting activities. Where not feasible, the following precautions are taken, as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows into onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
		matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**<u>Minimum Municipal BMP:</u>** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **<u>ESD BMP Implementation:</u>** Municipal vehicles and equipment are monitored daily for any leaks, and taken to the fleet services vehicle maintenance facility or a City approved equipment repair vendor immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as appropriate for the spilled material. See Section 7.3.15 for additional details regarding vehicle maintenance.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **ESD BMP Implementation:** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located in close proximity to liquid storage locations, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill and calling the Citywide hazardous waste contractor to assist with cleanup procedures. Emergency phone numbers are posted in a visible place with the spill kit.
28	Immediately clean up spills.	**Minimum Municipal BMP:** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **ESD BMP Implementation:** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a non-hazardous spill, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Then the spent material is swept, shoveled, or otherwise mechanically removed

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
		using dry methods and disposed of properly. If absorbents are insufficient to retain spilled materials, the spilled material is confined to the spill area until the spill response staff is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill if the structure of the existing area is insufficient to prohibit material from spreading. In the event of a hazardous materials spill, trained staff will don appropriate personal protective equipment and contain the spill using absorbent or by other means available. Potentially affected drain inlets are blocked off as necessary during cleanup activities. Then the hazardous waste is cleaned up, containerized, and properly labeled. If the management of the spill is beyond the abilities of ESD staff, the Fire-Rescue Department is called to control and mitigate the release and/or the Citywide hazardous waste contractor must be contacted for immediate response and clean-up of the spill. Additionally, the spill assessment form and 304 form must be completed for hazardous materials spills to determine if regulatory reporting is required and to document the spill. Failure to make appropriate notifications within 15 minutes may result in fines. See Section 3 for detailed information on discharge reporting and notification requirements.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**<u>Minimum Municipal BMP:</u>** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **<u>ESD BMP Implementation:</u>** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
Training and Education		
30	Provide pollution prevention signage for storm drains.	**Minimum Municipal BMP:** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **ESD BMP Implementation:** All municipal storm drain inlets located on City owned parcels managed by ESD are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue". Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**Minimum Municipal BMP:** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **ESD BMP Implementation:** The system used may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**<u>Minimum Municipal BMP:</u>** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **<u>ESD BMP Implementation:</u>** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the ESD annually, to include training on the implementation of all components of the applicable BMP Plan. In addition, landfill facilities are subject to the State Water Resources Control Board Industrial General Permit, Order No. 2014-0057-DWQ (IGP or Industrial General Permit). As such, training specific to IGP SWPPP implementation is conducted annually for pollution prevention team members.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **ESD BMP Implementation:** Trash and debris are removed throughout ESD facilities daily through pickup or sweeping activities, including around collection dumpsters, to ensure all areas remain free of loose litter, debris, liquids, powders, and sediment. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.
34	Properly store and dispose of green waste.	**Minimum Municipal BMP:** Green waste shall be properly stored and disposed of such that it will not be transported to the storm drain system by storm water or non-storm water runoff. SDMC §43.0307(a). **ESD BMP Implementation:** Green waste generated from ESD landscaping activities is collected and taken to the green waste area of the landfill. Green waste piles stored at the landfill are placed on pervious ground, away from the path of runoff, and hydrologically contained by a collection pond, where storm water flows are retained. Collected water is reused onsite for dust control purposes. Contaminated or unsuitable greenery materials are hauled to the landfill. Adequate windrow temperatures and moisture content are maintained, the finished product is stored upgradient of the raw product, and equipment that is used to handle finished product is free of any residue of raw product.

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
35	Manage animal waste and animal washing in a manner that prevents transport of wastes and wash water off-site.	**Minimum Municipal BMP:** Animals and animal waste shall be managed and stored in a manner that prevents animal supplies, waste, and wash water from entering the storm drain system. Collect and dispose of animal waste through trash receptacles or the sanitary sewer, as appropriate. SDMC §43.0307(a). **ESD BMP Implementation:** Animal waste is not actively accepted at the landfill. Animal bedding, when received, is added to green waste windrows. Adequate windrow temperatures and moisture content are maintained, the finished product is stored upgradient of the raw product, and equipment that is used to handle finished product is free of any residue of raw product. Windrows are located on impervious ground, away from the path of runoff, and hydrologically contained by a collection pond, where storm water flows are retained. Contaminated animal bedding or unsuitable waste materials are hauled to the landfill.
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **ESD BMP Implementation:** For ESD Facilities: • Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. • Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows. For Resident rollout carts: City policy requires all residents to maintain rollout carts with functioning lids that are kept closed. Functioning lids help

BMP ID[1]	BMP Title	ESD Minimum Municipal BMPs
		prevent rainwater from entering the bins and collection system. Annually, ESD will notify Residents regarding City policy to maintain functioning lids. For City maintained street litter containers: • All containers will be equipped with a metal top/cover to prevent rainwater from entering. • If containers become damaged to where rainwater could enter or the container could leak, ESD will address the damage to prevent rainwater from entering/exiting. For Landfill operations: • All solid waste cover is compacted daily. No water is allowed to stand on any landfill cover. • Mulch is applied to slope, intermediate cover areas, and stockpiles. • Areas are revegetated when operationally feasible. • Collection pond is pumped down between storm events. • Tackifier is applied to exposed cut/fill areas. For Inactive Landfill operations: • Bare spots are covered with mulch/compost. • Silt fences, wattles, geotextiles, rock rip rap, energy dissipaters or other structural BMPs are installed as applicable. • Areas are revegetated as necessary. • Deck and slope surfaces are maintained for proper drainage. For Bin Style Events, materials are moved from a private vehicle to bin or packer. Site is returned to the original condition when finished. For all community cleanup events, the area is surveyed after the event and any trash or debris is disposed of to the landfill.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water 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".

ESD-Specific Training

The ESD will create, execute, and fund training sessions, detailed in Table 7.3.4-3, that cover the implementation of the Minimum Municipal BMPs in Table 7.3.4-2. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.4-3. ESD-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Support Services		
Minimum Municipal BMPs for Collecting, Packaging, and Storing HHW	Contractor Staff; City Field Crew Employees if applicable	Ongoing; Prior to operations at HHW transfer facility and one-day events.
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
Hazardous Substances Enforcement Team		
Review Minimum Municipal BMPs for hazardous waste storage area	Supervisor, Crew	Annual
Facility Maintenance Staff And Vendors		
Storm Drain Maintenance (internal staff and vendor)	Supervisor, Crew	Annual
Parking Lot Maintenance (internal staff and vendor)	Supervisor, Crew	Annual
Litter and Recycling Container Storage Area Maintenance (internal staff)	Supervisor, Crew	Annual
Proper Fire Sprinkler Flushing Disposal (vendor)	Supervisor, Crew	Annual
Landscape and Irrigation Maintenance (vendor)	Supervisor, Crew	Annual

Training Module/Item	Staff Level	Schedule
Fountain Maintenance (internal staff)	Supervisor, Crew	Annual
Disposal Staff		
Standard Operating Procedures (SOPs)	Supervisor, EMS manager	Ongoing
Structural BMP installation	Supervisor	Ongoing
Nursery operations	Supervisor	Ongoing

Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the ESD in consultation with the Storm Water Division (e.g., including the "Think Blue" logo on materials). Table 7.3.4-4 lists the activities, specific targeted communities, and the anticipated schedule.

Table 7.3.4-4. Department External Outreach Activities by Target Audience

Activity	Target Audience(s)*	Schedule
"Think Blue" informational materials on display in Environmental Services Foyer information rack	1-4	Ongoing
Storm Water related article placement in *Curbsider Newsletter*	1-4	Ongoing
"Think Blue" informational materials on display in Environmental Services Foyer information rack	1-4	Ongoing
HHW Transfer Facility Brochure	4	Ongoing
Auto Product Recycling Event Flyer	4	Ongoing
Auto Product Recycling Event Water Bill Insert	4, Other – City Water Bill Customer List	1 – 2 times annually
Auto Product Recycling Event *Pennysaver* Inserts	4, Other – Selected zip codes all mailing addresses in zip code	Each Event (7-8 per year)
Auto Product Recycling Event San Diego *Union-Tribune* Inserts	4, Other – Selected zip codes - all subscribers in zip code	Each Event (7-8 per year)
Auto Product Recycling Event Ads	4	1-5 ads per each event
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.
Customer Service Hotline	1-4	Ongoing

Activity	Target Audience(s)*	Schedule
Certified Oil Collection Center Inspections	3	Annually
ESD web page	1-4	Update as needed

* Denoted as follows:
5. Industrial Owners and Operators
6. Construction Site Owners and Developers
7. Commercial Owners and Operators
8. Residential Community, General Public, and School Children

7.3.4.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.4-5, 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 7.3.4-5. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

Additionally, the ESD has identified the facilities within its inventory whose activities are closely aligned with those of industrial or commercial businesses. The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility. These facilities are denoted within the municipal facility inventory, provided as Appendix II.A.

7.3.4.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to §43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, ESD will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event

that corrections cannot be completed within this timeframe, ESD will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, ESD will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 “Conditionally Allowed Non-Storm Water Discharges” to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions

must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.4.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.5 Fire-Rescue Activities

This section is applicable to the City of San Diego (City) Fire-Rescue Department's fire and rescue activities. The goal of this section is to reduce the impact of these activities on storm water quality. This section contains Minimum Municipal best management practices (BMPs) the Fire-Rescue Department will implement during non-emergency operations, as well as emergency fire-rescue activities where appropriate, in addition to inventory, inspection, pollutant discharge reporting, education and annual reporting requirements.

The Fire-Rescue Department's inventory includes the 46 fire stations, fire communications, fire training facility, fire logistics facility, air operations base, 10 permanent lifeguard stations and 47 seasonal lifeguard towers. The Fire-Rescue Department will update any changes to the inventory, activities, and/or Minimum Municipal BMP implementation on an annual basis as part of the reporting process. Fire-Rescue Department facilities are listed in the Municipal Facilities Inventory; see Appendix II.A.

Responsible Department(s) or Division(s):

- Fire-Rescue Department

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.5-1.

Table 7.3.5-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.5.1	E.5.b.	Implement and maintain BMPs.
7.3.5.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.5.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.5.3	Attachment B.1.l.(6)	Report pollutant discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") or receiving waters.
7.3.5.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.5.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for Fire-Rescue Department facilities and activities are listed in Table 7.3.5-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the Fire-Rescue Department engages in. If future activities are begun by the Fire-Rescue Department that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

During emergency situations, priority of efforts is directed toward life, property, and the environment (in descending order). The Minimum Municipal BMPs listed below should be implemented, but should not interfere with immediate emergency response operations or impact public health and safety.

Table 7.3.5-2. Fire-Rescue Department Minimum Municipal BMPs

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **Fire-Rescue Department BMP Implementation:** No illicit connections are known to exist on Fire-Rescue Department facilities. Any suspected illicit connections discovered by Fire-Rescue Department staff will be reported to the "Think Blue" Hotline for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **Fire-Rescue Department BMP Implementation:** During training activities, direct water flows to landscaped areas, whenever possible. When flows cannot be directed to a landscaped area, the officer in charge will ensure that all areas which may come into contact with water flows are cleaned of any debris or other pollutant sources prior to starting the training activity, so that pollutants do not enter the storm drain system. Further implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 11, below.
3	Properly dispose of process and wash water.	**Minimum Municipal BMP:** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **Fire-Rescue Department BMP Implementation:** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Any water from processing activities, such as tile cutting, is contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite. If necessary, solids are allowed to settle out prior to disposal, and solids are disposed of to a solid waste dumpster.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**Minimum Municipal BMP:** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **Fire-Rescue Department BMP Implementation:** Non-fire engine and lifeguard and off-road vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities. Fire engines and lifeguard and off-road vehicles are washed at the stations by department personnel with biodegradable soaps. All wash water is contained and diverted to the sanitary sewer, where appropriate connections exist. Where connections do not exist, wash water is diverted into landscaping or other pervious areas as long as no water is discharged to the storm drain system or offsite.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**Minimum Municipal BMP:** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **Fire-Rescue Department BMP Implementation:** Where sprinkler systems are used, regular maintenance and visual observation of the irrigation system is performed to prevent overspray, leaks, and other problems that could result in runoff to City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. If rain is forecast, sprinklers are temporarily shut off to prevent water waste and runoff from saturated landscaped areas. Irrigation time periods and volumes are adjusted as needed to prevent oversaturation. When watering by hand, the amount of water applied is carefully controlled to prevent irrigation runoff. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed. During maintenance activities, soil and water are prevented from entering the storm drain system. After digging out a line, all soil is returned to the hole and compacted. The area is swept to remove any remaining soil. When bailing out an area after a line break, muddy water is discharged onto a pervious area.
8	Properly dispose of discharges from swimming pools, spas, fountains, reflective pools, ponds, and filter backwash.	**Minimum Municipal BMP:** Swimming pools, spas, fountains, reflective pools, ponds, and filter backwash water shall be properly disposed of to prevent pollutants from entering the storm drain system. SDMC §43.0304 & §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **Fire-Rescue Department BMP Implementation:** Fountain maintenance water is discharged to landscaping when maintenance occurs.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
11	Eliminate floor mat cleaning discharges.	**Minimum Municipal BMP:** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **Fire-Rescue Department BMP Implementation:** Floor mats are primarily cleaned using a vacuum. If wet cleaning is needed, this is done within a mop sink with a connection to the sanitary sewer.
13	Regularly clean and maintain structural BMPs and LID installations, to ensure proper performance.	**Minimum Municipal BMP:** BMPs installed, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** The Fire-Rescue Department is responsible for the inspection and maintenance of any treatment control BMPs, or structural BMPs, on Fire-Rescue Department properties. These installations are inspected, and maintained where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**<u>Minimum Municipal BMP:</u>** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **<u>Fire-Rescue Department BMP Implementation:</u>** All unpaved areas on Fire-Rescue Department facilities with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
Good Housekeeping		
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>Fire-Rescue Department BMP Implementation:</u>** All lifeguard and fire station cement areas are swept weekly, and fire station parking lots and driveways are swept twice per year by the Storm Water Division of the Transportation & Storm Water Department. The entire parking lot and driveway areas are cleaned during each event. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**Minimum Municipal BMP:** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** The Fire-Rescue Department is responsible for the inspection and maintenance of any storm drain inlets or building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on Fire-Rescue Department properties. These structures are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Trash and debris are picked up around Fire-Rescue facilities, including trash and recycling containers and dumpsters, as needed to keep them free of accumulated debris. This is completed weekly. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and placed in dumpsters for disposal. Good housekeeping practices are implemented for onsite activities, which include cleaning any outdoor work areas throughout, and immediately following the activity. See Minimum Municipal BMP 24 for additional details regarding outdoor work areas.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Liquids are stored within buildings or other secondary containment structures where they will not drain to outdoor areas in the event of a spill or leak.
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Hazardous materials are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Materials that are a potential source of pollutants should not be stored outdoors. In the event that a special circumstance, such as construction activities, requires outdoor storage, materials will be stored in a manner that prevents contact with storm water including placing materials out of the path of runoff, or diverting runoff around storage areas, and providing appropriate cover if rain is forecast. Materials will be checked on a regular basis to verify the structural BMPs (such as roofs, awnings, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Hazardous materials are labeled with the material and include additional information as required by other agencies.
Pesticide and Fertilizer Management		
22	Properly manage pesticides and fertilizers.	**Minimum Municipal BMP:** Pesticides and fertilizers shall be applied in strict accordance with manufacturer's label, as authorized by U.S. Environmental Protection Agency (USEPA). Chemicals shall be stored safely in covered and contained areas. Waste products shall be disposed of in accordance with the manufacturer's label and applicable hazardous waste regulations. The use of integrated pest management principles is encouraged to reduce or eliminate use of chemicals. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:**

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
		City employees in approved classifications who apply pesticides must be licensed pesticide handlers. These employees are trained in the proper storage, handling and disposal of pesticides. Where outside contractors are used, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Pesticide applications are based on the recommendations of a licensed Pest Control Advisor. Fertilizers and pesticides are applied sparingly, directly to the intended area, and in accordance with manufacturer's directions as approved by the USEPA, at times when rain is not predicted and irrigation is not scheduled. Any pesticides or fertilizers that are spilled, or fall outside their intended area, are removed immediately and thoroughly. Where possible, integrated pest management methods are used, including: No controls, physical/mechanical controls, environmental controls (mulching, pest-resistant vegetation, prescribed burns), biological controls (predators, parasites, etc.), less toxic chemical controls (e.g., soaps and oils) and/or hot water. Where chemical controls are necessary, the least toxic chemicals that will do the job (e.g., biodegradable products) are used. Pesticides and fertilizers are applied and handled, in accordance with existing state regulations (California Title 3, Division 6, Pesticides and Pest Control Operations), and detailed records are kept. Unused chemicals are collected and disposed of as a regulated waste. Pest control application procedures are reviewed annually, and conform to the current San Diego County Department of Agriculture regulations.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
		Planning
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **Fire-Rescue Department BMP Implementation:** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for Fire-Rescue Department Facilities.
		Outdoor Work Areas
24	Implement controls to minimize pollution from exposed outdoor work areas.	**Minimum Municipal BMP:** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Minor pieces of equipment used in operations and

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
		maintenance are taken to City-approved vendors for repair when needed. All activities are performed indoors where feasible, such as pre-painting items, or cutting activities. Where not feasible, the following precautions are taken, as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows into onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles or equipment.	**Minimum Municipal BMP:** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Municipal vehicles are monitored daily for leaks, and non-fire engine vehicles are taken to the fleet services vehicle maintenance facility immediately if necessary. If a fire engine is leaking, fleet services staff will service the vehicle where it sits. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste. Leaking equipment is repaired or taken to a City approved equipment repair vendor promptly. See Section 7.3.15 for additional details regarding vehicle maintenance.
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located in close proximity to liquid storage locations, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill until it can be removed.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
28	Immediately clean up spills.	**<u>Minimum Municipal BMP:</u>** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **<u>Fire-Rescue Department BMP Implementation:</u>** Spills that occur on City property or in the City's right-of-way are the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system, will respond. In the event of a biohazard spill, the Police Department is responsible for contacting the citywide contractor for cleanup. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept, shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents or other spill kit materials would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area. The City's "Think Blue" Hotline is called to report the spill and request cleanup assistance. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
		that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**<u>Minimum Municipal BMP:</u>** **If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a).** **<u>Fire-Rescue Department BMP Implementation:</u>** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
Training and Education		
30	Provide pollution prevention signage for storm drains.	**<u>Minimum Municipal BMP:</u>** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **<u>Fire-Rescue Department BMP Implementation:</u>** All municipal storm drain inlets located on City owned parcels managed by the Fire-Rescue Department are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue". Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**<u>Minimum Municipal BMP:</u>** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **<u>Fire-Rescue Department BMP Implementation:</u>** The system used by the Fire-Rescue Department may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**Minimum Municipal BMP:** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **Fire-Rescue Department BMP Implementation:** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the Fire-Rescue Department annually, to include training on the implementation of all components of the BMP Plan.
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Trash and debris are removed throughout Fire-Rescue Department facilities daily through pickup or sweeping activities, including around dumpsters, to ensure all areas remain free of loose litter, debris, liquids, powders, and sediment. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.

BMP ID[1]	BMP Title	Fire-Rescue Department Minimum Municipal BMPs
34	Properly store and dispose of green waste.	**Minimum Municipal BMP:** Green waste shall be properly stored and disposed of such that it will not be transported to the storm drain system by storm water or non-storm water runoff. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Green waste is generally collected and placed into dumpsters after regular landscape maintenance activities, or used onsite as mulch or a soil amendment. Green waste dumpsters may also be rented from the Environmental Services Department in anticipation of larger landscape maintenance projects, so the wastes will be disposed of to the green waste section of the landfill. Landscape activities are scheduled to occur during dry weather, when feasible. Temporary green waste dumpsters or piles are placed away from storm drains and concentrated flow paths, and covered in the event of rain.
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **Fire-Rescue Department BMP Implementation:** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water 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”.

Fire-Rescue Department-Specific Training

The Fire-Rescue Department will create, execute, and fund training sessions, detailed in Table 7.3.5-3, that cover the implementation of the Minimum Municipal BMPs in Table 7.3.5-2. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.5-3. Fire-Rescue Department-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Vehicle washing	All	Ongoing
Training Activities	All	Ongoing
Hazardous Waste Storage Area	All	Ongoing
Hazardous Materials Storage Area	All	Ongoing
storm drain system Inspection and Cleaning	All	Ongoing
Refuse Dumpsters	All	Ongoing
Landscaping	All	Ongoing
Parking Lot/Structure Maintenance	All	Ongoing

Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Fire-Rescue Department in consultation with the Storm Water Division (e.g., including the "Think Blue" logo on materials). Table 7.3.5-4 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 7.3.5-4. Department External Outreach Activities by Target Audience

Activity	Target Audience(s)*	Schedule
Lifeguards		
1. Boaters- Sewage/Bilge BMPs	4	Ongoing
2. Recreation Vehicle- Sewage BMPs	4	Ongoing
3. Beach Day Users- BMPs	4	Ongoing
4. Mission Bay Boater's Guide/Map	4	Ongoing

* Denoted as follows:

9. Industrial Owners and Operators
10. Construction Site Owners and Developers
11. Commercial Owners and Operators

12. Residential Community, General Public, and School Children

7.3.5.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.5-5, 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 7.3.5-5. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

Additionally, the Fire-Rescue Department has identified the facilities within its inventory whose activities are closely aligned with those of industrial or commercial businesses. The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility. These facilities are denoted within the municipal facility inventory, provided as Appendix II.A.

7.3.5.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC 43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the Fire-Rescue Department will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the Fire-Rescue Department will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, the Fire-Rescue Department will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 "Conditionally Allowed Non-Storm Water Discharges" to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.5.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan

annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.6 Non-Emergency Police Activities

This program section is applicable to the City of San Diego (City) 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 Minimum Municipal best management practices (BMPs) the Police Department will implement during non-emergency activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

The Police Department's facilities inventory includes nine area command stations, headquarters, and the traffic division, air patrol, and canine patrol facilities. The Police Department will update any changes to the inventory, activities, and/or BMP implementation on an annual basis as part of the reporting process described in Section 7.3.6.4, "Annual Reporting."

Responsible Department(s) or Division(s):

- Police Department

Police Department facilities are listed in the Municipal Facilities Inventory; see Appendix II.A.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.6-1.

Table 7.3.6-1 Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.6.1	E.5.b.	Implement and maintain BMPs.
7.3.6.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.6.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.6.3	Attachment B.1.l.(6)	Report pollutant discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") or receiving waters.
7.3.6.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.6.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for Police Department facilities are listed in Table 7.3.6-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the Police Department engages in. If future activities are begun by the Police Department that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.6-2. Police Department Activities Minimum Municipal BMPs

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **Police Department BMP Implementation:** No illicit connections are known to exist on Police Department facilities. Any suspected illicit connections discovered by Police Department staff will be reported to the "Think Blue" Hotline for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **Police Department BMP Implementation:** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 11, below.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**<u>Minimum Municipal BMP:</u>** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **<u>Police Department BMP Implementation:</u>** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Any water from processing activities, such as tile cutting, is contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite. If necessary, solids are allowed to settle out prior to disposal, and solids are disposed of to a solid waste dumpster.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**<u>Minimum Municipal BMP:</u>** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **<u>Police Department BMP Implementation:</u>** Municipal vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
5	Properly dispose of water from fire sprinkler maintenance activities.	**<u>Minimum Municipal BMP:</u>** Fire sprinkler system discharges containing corrosion inhibitors, fire suppressants, or antifreeze shall be disposed through the sanitary sewer system, not the storm drain system. Fire sprinkler system discharges without corrosion inhibitors, fire suppressants, or antifreeze shall be disposed through the sanitary sewer, if practicable. When not practicable to discharge to the sanitary sewer system, the water shall not be discharged unless adequate precautions have been taken to prevent the transport of pollutants to the storm drain system. SDMC §43.0304 & §43.0307(a). **<u>Police Department BMP Implementation:</u>** Where maintenance is performed by municipal staff, fire sprinkler system effluent is discharged to the sanitary sewer. Where maintenance is performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language."

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**<u>Minimum Municipal BMP:</u>** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **<u>Police Department BMP Implementation:</u>** Where maintenance is performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Where sprinkler systems are used, regular maintenance and visual observation of the irrigation system is performed to prevent overspray, leaks, and other problems that could result in runoff to City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. If rain is forecast, sprinklers are temporarily shut off to prevent water waste and runoff from saturated landscaped areas. Irrigation time periods and volumes are adjusted as needed to prevent oversaturation. When watering by hand, the amount of water applied is carefully controlled to prevent irrigation runoff. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed. During maintenance activities, soil and water are prevented from entering the storm drain system. After digging out a line, all soil is returned to the hole and compacted. The area is swept to remove any remaining soil. When bailing out an area after a line break, muddy water is discharged onto a pervious area.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
9	Control air conditioning condensation discharges.	**<u>Minimum Municipal BMP:</u>** Air conditioning condensation discharges shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>Police Department BMP Implementation:</u>** For existing buildings, all condensate lines shall be discharged to the sanitary sewer where feasible. Where not feasible, air conditioning condensation discharges that would otherwise reach the City's storm drain system shall be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Landscaped areas should be at least five feet away from a building, and the landscaped area should slope away from buildings. For new development or building remodels, all condensate lines shall be connected to the sanitary sewer. If air conditioning and chiller units are treated with descaling or anti-algal agent, all flushing agent residues are disposed of properly, and the condensate line is bypassed while flushing unit. When heating, ventilating, and air conditioning (HVAC) condenser tubes are flushed, water is captured and disposed of properly. If chemicals are used, ESD-HMMP is contacted for disposal options.
11	Eliminate floor mat cleaning discharges.	**<u>Minimum Municipal BMP:</u>** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **<u>Police Department BMP Implementation:</u>** Floor mats are cleaned offsite by an outside contractor.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
13	Regularly clean and maintain structural BMPs and LID installations, to ensure proper performance.	**<u>Minimum Municipal BMP:</u>** BMPs implemented, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **<u>Police Department BMP Implementation:</u>** The Police Department is responsible for the inspection and maintenance of any treatment control BMPs, or structural BMPs, on [Airports Division] properties. These installations are inspected, and maintained where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**<u>Minimum Municipal BMP:</u>** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **<u>Police Department BMP Implementation:</u>** All unpaved areas on Police Department facilities with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
Good Housekeeping		
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>Police Department BMP Implementation:</u>** Paved parking lots, roads, and driveways maintained by the Storm Water Division of the Transportation & Storm Water Department are swept at least once per year, and City yards are swept once per month. See Section 7.3.14 for additional details. Where departments or divisions maintain their own paved facilities, sweeping occurs at least once per year. In either case, the entire impervious surface is swept during each sweeping event. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**Minimum Municipal BMP:** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **Police Department BMP Implementation:** The Police Department is responsible for the inspection and maintenance of any storm drain inlets or building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on Police Department properties. These structures are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **Police Department BMP Implementation:** Trash and debris are picked up around municipal building, parking, and landscaped areas, including trash and recycling containers and dumpsters, as needed to keep them free of accumulated debris. This is completed on up to a daily frequency for high use areas. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and placed in dumpsters for disposal. Good housekeeping practices are implemented for onsite activities, which include cleaning any outdoor work areas throughout, and immediately following the activity. See Minimum Municipal BMP 24 for additional details regarding outdoor work areas.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **Police Department BMP Implementation:** Liquids are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak.
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **Police Department BMP Implementation:** Hazardous materials are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **Police Department BMP Implementation:** Materials that are a potential source of pollutants should not be stored outdoors. In the event that a special circumstance, such as construction activities, requires outdoor storage, materials will be stored in a manner that prevents contact with storm water including placing materials out of the path of runoff, or diverting runoff around storage areas, and providing appropriate cover if rain is forecast. Materials will be checked on a regular basis to verify the structural BMPs (such as roofs, awnings, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **Police Department BMP Implementation:** Hazardous materials are be labeled with the material and include additional information as required by other agencies.
Pesticide and Fertilizer Management		
22	Properly manage pesticides and fertilizers.	**Minimum Municipal BMP:** Pesticides and fertilizers shall be applied in strict accordance with manufacturer's label, as authorized by U.S. Environmental Protection Agency (USEPA). Chemicals shall be stored safely in covered and contained areas. Waste products shall be disposed of in accordance with the manufacturer's label and applicable hazardous waste regulations. The use of integrated pest management principles is encouraged to reduce or eliminate use of chemicals. SDMC §43.0307(a).

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
		<u>Police Department BMP Implementation:</u> City employees in approved classifications who apply pesticides must be licensed pesticide handlers. These employees are trained in the proper storage, handling and disposal of pesticides. Where outside contractors are used, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Pesticide applications are based on the recommendations of a licensed Pest Control Advisor. Fertilizers and pesticides are applied sparingly, directly to the intended area, and in accordance with manufacturer's directions as approved by the USEPA, at times when rain is not predicted and irrigation is not scheduled. Any pesticides or fertilizers that are spilled, or fall outside their intended area, are removed immediately and thoroughly. Where possible, integrated pest management methods are used, including: No controls, physical/mechanical controls, environmental controls (mulching, pest-resistant vegetation, prescribed burns), biological controls (predators, parasites, etc.), less toxic chemical controls (e.g., soaps and oils) and/or hot water. Where chemical controls are necessary, the least toxic chemicals that will do the job (e.g., biodegradable products) are used. Pesticides and fertilizers are applied and handled, in accordance with existing state regulations (California Title 3, Division 6, Pesticides and Pest Control Operations), and detailed records are kept. Unused chemicals are collected and disposed of as a regulated waste. Pest control application procedures are reviewed annually, and conform to the current San Diego County Department of Agriculture regulations.
Planning		

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **Police Department BMP Implementation:** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for Police Department Facilities.
Outdoor Work Areas		
24	Implement controls to minimize pollution from exposed outdoor work areas.	**Minimum Municipal BMP:** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **Police Department BMP Implementation:** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, “Storm Water Contract Language.” Minor pieces of equipment used in operations and maintenance are taken to City-approved vendors for repair

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
		when needed. All activities are performed indoors where feasible, such as pre-painting items, or cutting activities. Where not feasible, the following precautions are taken, as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**<u>Minimum Municipal BMP:</u>** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **<u>Police Department BMP Implementation:</u>** Municipal vehicles and equipment are monitored daily for leaks, and taken to the fleet services vehicle maintenance facility or a City approved equipment repair vendor immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste. See Section 7.3.15 for additional details regarding vehicle maintenance.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **Police Department BMP Implementation:** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located in close proximity to liquid storage locations, appropriate to the type and size of potential spills. Response procedures are detailed in Minimum Municipal BMP 28. Emergency phone numbers, including the City's "Think Blue" Hotline are posted in a visible place with the spill kit.
28	Immediately clean up spills.	**Minimum Municipal BMP:** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **Police Department BMP Implementation:** Spills that occur on City property or in the City's right-of-way are the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system, will respond. In the event of a biohazard spill, the Police Department is responsible for contacting the citywide contractor for cleanup. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
		residue has been absorbed. Then the spent material is swept, shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents or other spill kit materials would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area. The City's "Think Blue" Hotline is called to report the spill and request cleanup assistance. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**<u>Minimum Municipal BMP:</u>** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **<u>Police Department BMP Implementation:</u>** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
		Training and Education
30	Provide pollution prevention signage for storm drains.	**Minimum Municipal BMP:** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **Police Department BMP Implementation:** All municipal storm drain inlets located on City owned parcels managed by the Police Department are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue". Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**Minimum Municipal BMP:** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **Police Department BMP Implementation:** The system used by the Police Department may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity. The Police Department will inspect and maintain BMPs installed at outdoor firing ranges. The BMP's including swales with mulch and gravel bases, screens on inlets, and straw wattles around parking areas have been installed at the facility on 4008 Federal Boulevard to prevent release of soil to onsite storm drains. The BMPs at these facilities will be inspected annually to ensure that they are functioning properly.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**Minimum Municipal BMP:** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **Police Department BMP Implementation:** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the Police Department annually, to include training on the implementation of all components of the BMP Plan.
		Waste Management
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **Police Department BMP Implementation:** Trash and debris are picked up around municipal building, parking, and landscaped areas, including trash cans and dumpsters, weekly to keep them free of accumulated debris. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
34	Properly store and dispose of green waste.	**<u>Minimum Municipal BMP:</u>** Green waste shall be properly stored and disposed of such that it will not be transported to the storm drain system by storm water or non-storm water runoff. SDMC §43.0307(a). **<u>Police Department BMP Implementation:</u>** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Green waste is generally collected and hauled offsite after regular landscape maintenance activities, although if needed, it may be used onsite as mulch or a soil amendment. Green waste dumpsters may also be rented from the Environmental Services Department in anticipation of larger landscape maintenance projects, so the wastes will be disposed of to the green waste section of the landfill. Landscape activities are scheduled to occur during dry weather, when feasible. Any temporary green waste dumpsters or piles are placed away from storm drains and concentrated flow paths, and covered in the event of rain.

BMP ID[1]	BMP Title	Police Department Minimum Municipal BMPs
35	Manage animal waste and animal washing in a manner that prevents transport of wastes and wash water off-site.	**Minimum Municipal BMP:** Animals and animal waste shall be managed and stored in a manner that prevents animal supplies, waste, and wash water from entering the. Collect and dispose of animal waste through trash receptacles or the sanitary sewer, as appropriate. SDMC §43.0307(a). **Police Department BMP Implementation:** Canine Police Unit Officers from all jurisdictions pick up dog waste daily with bags and dispose of in trash cans. While on patrol, waste will be picked up and disposed of in trash cans immediately. Animals shall be kept away from the storm drain system to prevent accidental discharge of animal waste. Any water used to clean animals or animal housing shall be disposed of to the sanitary sewer or be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the or any adjacent property. If animal wash areas exist on site, they shall be designed to prevent discharges to the storm drain system. Animal wash areas shall not be established near storm drains.
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **Police Department BMP Implementation:** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water 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".

Police Department-Specific Training

The Police Department will create, execute, and fund training sessions, detailed in Table 7.3.6-3, that cover the implementation of the Minimum Municipal BMPs in Table 7.3.6-2. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.6-3. Police Department-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Minimum Municipal BMPs for Air Support	Supervisor, Crew	Ongoing
Minimum Municipal BMPS for Canine Patrol Units-educating officers from all jurisdictions pick up dog waste daily with bags and dispose of in trash cans.	Supervisor, Crew	Ongoing
Parking Structure Sump Pump Maintenance	Supervisor, Crew	Ongoing

7.3.6.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.6-4, 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 7.3.6-4. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

Additionally, the Police Department has identified the facilities within its inventory whose activities are closely aligned with those of industrial or commercial businesses. The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility. These facilities are denoted within the municipal facility inventory, provided as Appendix II.A.

7.3.6.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the Police Department will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the Police Department will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, the Police Department will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 “Conditionally Allowed Non-Storm Water Discharges” to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.6.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.7 Public Utilities - Wastewater Collection

The City of San Diego (City) Public Utilities Department (PUD) Wastewater Collection Division (WWCD) operates the facilities covered under this section. Among other tasks, the WWCD provides wastewater conveyance services, including ongoing preventive cleaning, maintenance, televising, and repair of the Municipal Sewage Collection System, i.e., sewer pipelines, including emergency removal of sewer line stoppages, equipment overhaul and repair, onsite facility inspections, and maintenance of the structural integrity of sewer mains and manholes in the collection system. The WWCD prevents and eliminates the discharge of sewage to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") due to spills, leaks, and sanitary sewer overflows through its Sewer System Management Plan.

Responsible Department(s) or Division(s):

- Wastewater Collection Division of the Public Utilities Department

Sewage systems themselves are not a regular source of storm water pollution, however 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 Minimum Municipal best management practices (BMPs) that WWCD will implement for wastewater collection activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

Collection facilities that are covered under this program are a complex combination of gravity sewers, lift stations, force mains, 8 small pump stations with storm drain inlets, approximately 23 interceptor pump stations and approximately 55 diversion valves. WWCD will update any changes to the inventory, activities, and/or Minimum Municipal BMP Implementation on an annual basis as part of the reporting process. WWCD facilities are listed in the Municipal Facilities Inventory; see Appendix II.A.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.7-1.

Table 7.3.7-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A and Appendix II.B	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.7.1	E.5.b.	Implement and maintain BMPs.
7.3.7.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.7.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.7.3	Attachment B.1.l.(6)	Report pollutant discharges to the storm drain system or receiving waters.
7.3.7.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.7.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for wastewater collection activities are listed in Table 7.3.7-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the WWCD engages in. If future activities are begun by the WWCD that are not covered by the Minimum Municipal BMPs below, the applicable Minimum Municipal BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.7-2 Wastewater Collection Division Minimum Municipal BMPs

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
		Discharge Control
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **WWCD BMP Implementation:** No illicit connections are known to exist on WWCD facilities. Any suspected illicit connections discovered by WWCD staff will be reported to the "Think Blue" Hotline for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **WWCD BMP Implementation:** Discharges from the Sanitary Sewer are prevented through the implementation of a system wide cleaning plan, whereby every pipe is cleaned on at least a 5 year frequency. If a problem is noted, the cleaning frequency is adjusted or the pipe is repaired or replaced as appropriate. Additionally, sewage infiltration to the storm drain system is prevented through regular inspection, sewer main televising, and field staff education on the seepage recognition. The WWCD also complies with the State of California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Sewers for the acceptable separation between the newly installed sewer pipelines and the storm drain system. Additional implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 9, below.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**Minimum Municipal BMP:** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **WWCD BMP Implementation:** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Any water from processing activities, such as tile cutting, is contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite. If necessary, solids are allowed to settle out prior to disposal, and solids are disposed of to a solid waste dumpster.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**Minimum Municipal BMP:** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **WWCD BMP Implementation:** Municipal vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
5	Properly dispose of water from fire sprinkler maintenance activities.	**<u>Minimum Municipal BMP:</u>** Fire sprinkler system discharges containing corrosion inhibitors, fire suppressants, or antifreeze shall be disposed through the sanitary sewer system, not the storm drain system. Fire sprinkler system discharges without corrosion inhibitors, fire suppressants, or antifreeze shall be disposed through the sanitary sewer, if practicable. When not practicable to discharge to the sanitary sewer system, the water shall not be discharged unless adequate precautions have been taken to prevent the transport of pollutants to the storm drain system. SDMC §43.0304 & §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>WWCD BMP Implementation:</u>** Where maintenance is performed by municipal staff, fire sprinkler system effluent is discharged to the sanitary sewer. Where maintenance is performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language."

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**<u>Minimum Municipal BMP:</u>** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **<u>WWCD BMP Implementation:</u>** Where maintenance is performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Where sprinkler systems are used, regular maintenance and visual observation of the irrigation system is performed to prevent overspray, leaks, and other problems that could result in runoff to City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. If rain is forecast, sprinklers are temporarily shut off to prevent water waste and runoff from saturated landscaped areas. Irrigation time periods and volumes are adjusted as needed to prevent oversaturation. When watering by hand, the amount of water applied is carefully controlled to prevent irrigation runoff. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed. During maintenance activities, soil and water are prevented from entering the storm drain system. After digging out a line, all soil is returned to the hole and compacted. The area is swept to remove any remaining soil. When bailing out an area after a line break, muddy water is discharged onto a pervious area.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
9	Control air conditioning condensation discharges.	**<u>Minimum Municipal BMP:</u>** Air conditioning condensation discharges shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>WWCD BMP Implementation:</u>** For existing buildings, all condensate lines shall be discharged to the sanitary sewer where feasible. Where not feasible, air conditioning condensation discharges that would otherwise reach the City's storm drain system shall be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Landscaped areas should be at least five feet away from a building, and the landscaped area should slope away from buildings. For new development or building remodels, all condensate lines shall be connected to the sanitary sewer. If air conditioning and chiller units are treated with descaling or anti-algal agent, all flushing agent residues are disposed of properly, and the condensate line is bypassed while flushing unit. When heating, ventilating, and air conditioning (HVAC) condenser tubes are flushed, water is captured and disposed of properly. If chemicals are used, ESD-HMMP is contacted for disposal options.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
13	Regularly clean and maintain structural BMPs and LID installations, to ensure proper performance.	**Minimum Municipal BMP:** BMPs installed, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **WWCD BMP Implementation:** The PUD is responsible for the inspection and maintenance of any treatment control BMPs, or structural BMPs, on WWCD properties. These installations are inspected, and maintained where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**Minimum Municipal BMP:** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **WWCD BMP Implementation:** All unpaved areas on WWCD facilities with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
Good Housekeeping		
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>WWCD BMP Implementation:</u>** Paved parking lots, roads, and driveways maintained by the Storm Water Division of the Transportation & Storm Water Department are swept at least once per year, and City yards are swept once per month. See Section 7.3.14 for additional details. Where departments or divisions maintain their own paved facilities, sweeping occurs at least once per year. In either case, the entire impervious surface is swept during each sweeping event. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**Minimum Municipal BMP:** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **WWCD BMP Implementation:** The PUD is responsible for the inspection and maintenance of any storm drain inlets or building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on WWCD properties. These structures are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **WWCD BMP Implementation:** Trash and debris are picked up around municipal building, parking, and landscaped areas, including trash and recycling containers and dumpsters, as needed to keep them free of accumulated debris. This housekeeping is completed on up to a daily frequency for high use areas. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and placed in dumpsters for disposal. Good housekeeping practices are implemented for onsite activities, which include cleaning any outdoor work areas throughout, and immediately following the activity. See Minimum Municipal BMP 24 for additional details regarding outdoor work areas.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **WWCD BMP Implementation:** Liquids are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak.
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **WWCD BMP Implementation:** Hazardous materials are stored within buildings, or within secondary containment and cover, where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system. SDMC §43.0307(a). **WWCD BMP Implementation:** Materials that are a potential source of pollutants are not stored outdoors, where feasible. In the event that outdoor storage is necessary, materials will be stored in a manner that prevents pollutants from reaching the storm drain system. Methods may include any one, or a combination, of the following practices as needed to prevent pollutant transport in the event that rain is forecast, and as appropriate for the type of material and the location stored: • Placing materials out of the path of runoff; • Containing materials using berms, fiber rolls, gravel bags, or other structural containment; • Diverting runoff around storage areas; and • Providing appropriate cover. Materials will be checked on a regular basis to verify the structural BMPs (such as gravel bags, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **WWCD BMP Implementation:** Hazardous materials are be labeled with the material and include additional information as required by other agencies.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
Planning		
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **WWCD BMP Implementation:** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for WWCD facilities and projects.
Outdoor Work Areas		
24	Implement controls to minimize pollution from exposed outdoor work areas.	**Minimum Municipal BMP:** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **WWCD BMP Implementation:** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, “Storm Water Contract Language.” Minor pieces of equipment used in operations and

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
		maintenance are taken to City-approved vendors for repair when needed. All activities are performed indoors where feasible, such as pre-painting or cutting activities. Where not feasible, the following precautions are taken as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows into onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**Minimum Municipal BMP:** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **WWCD BMP Implementation:** Municipal vehicles and equipment are monitored daily for leaks, and taken to the fleet services vehicle maintenance facility or a City approved equipment repair vendor immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste. See Section 7.3.15 for additional details regarding vehicle maintenance.
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **WWCD BMP Implementation:** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located in close proximity to liquid storage locations, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill and calling the Storm Water Division to assist with cleanup procedures. Emergency phone numbers are posted in a visible place with the spill kit.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
28	Immediately clean up spills.	**<u>Minimum Municipal BMP:</u>** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **<u>WWCD BMP Implementation:</u>** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept, shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area until the spill response staff, is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
		hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**Minimum Municipal BMP:** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **WWCD BMP Implementation:** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
Training and Education		
30	Provide pollution prevention signage for storm drains.	**<u>Minimum Municipal BMP:</u>** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0304(a). **<u>WWCD BMP Implementation:</u>** All municipal storm drain inlets located on City owned parcels managed by the WWCD are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue". Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**<u>Minimum Municipal BMP:</u>** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **<u>WWCD BMP Implementation:</u>** The system used by the WWCD may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**Minimum Municipal BMP:** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **WWCD BMP Implementation:** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the PUD annually, to include training on the implementation of all components of the BMP Plan.
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **WWCD BMP Implementation:** Trash and debris are picked up around municipal building, parking, and landscaped areas, including trash cans and dumpsters, weekly to keep them free of accumulated debris. If wet cleaning is needed, all wash water will be captured and disposed of according to BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.

BMP ID[1]	BMP Title	Wastewater Collection Division Minimum Municipal BMPs
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **WWCD BMP Implementation:** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water 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” training.

Wastewater Collection Division-Specific Training

The PUD creates, executes, and funds training sessions, detailed in Table 7.3.7-3, that cover the implementation of the Minimum Municipal BMPs in Table 7.3.7-2 via an annual training session called the Fall Classic. Attendance at this event is mandatory for all WWCD staff, excluding administrative personnel. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.7-3. Wastewater Collection Division-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Storm Water Pollution Prevention – Minimum Municipal BMP implementation	Supervisor, Crew	Ongoing

7.3.7.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.7-4, 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). The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility.

Table 7.3.7-4. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

7.3.7.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the WWCD will perform the necessary correction within

30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the WWCD will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, the WWCD will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 “Conditionally Allowed Non-Storm Water Discharges” to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions

must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.7.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.8 Public Utilities - Wastewater Treatment

The City of San Diego (City) Public Utilities Department (PUD) Treatment and Disposal Division (T&D) is responsible for the conveyance, treatment and disposal of wastewater and its by-products with support from the Environmental Monitoring and Technical Services (EMTS), and Engineering and Program Management (EPM) Divisions. Central Support Facilities (CSF) is a section of the T&D Division who oversees department-wide facilities and equipment maintenance. These Divisions operate plants and pump stations, ensure regulatory compliance, and oversee design, construction, and upgrades to facilities.

Sewage systems themselves are not a regular source of storm water pollution, however raw sewage contains pollutants that can pose a serious threat to both human health and the quality of receiving waters if it enters the municipal separate storm sewer system (MS4; hereafter, "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 the Minimum Municipal best management practices (BMPs) that the Divisions will implement for treatment and disposal activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

Responsible Department(s) or Division(s):

- Treatment and Disposal Division of the Public Utilities Department

Supporting Department(s) or Division(s):

- Environmental Monitoring and Technical Services Division
- Engineering and Program Management Division

T&D 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 Metro Biosolids Center. The second category includes eight large pump stations. Some of the aforementioned facilities are subject to the State Water Resources Control Board Industrial General Permit, Order No. 2014-0057-DWQ. As such, these facilities have Storm Water Pollution Prevention Plans in place. These Divisions oversee the facility maintenance of the Metropolitan Operations Complex (MOC) and the Environmental Monitoring and Technical Services Laboratory.

These Divisions will update any changes to the inventory, activities, and/or Minimum Municipal BMP implementation on an annual basis as part of the reporting process.

Division facilities are listed in the Municipal Facilities Inventory; see Appendix II.A.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.8-1.

Table 7.3.8-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A and Appendix II.B	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.8.1	E.5.b.	Implement and maintain BMPs.
7.3.8.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.8.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.8.3	Attachment B.1.l.(6)	Report pollutant discharges to the storm drain system or receiving waters.
7.3.8.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.8.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for T&D and EMTS Division facilities and activities, and EPM Division projects are listed in Table 7.3.8-2, below. These Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the T&D, EMTS, and EPM Divisions engage in. If future activities are begun by the T&D, EMTS, and EPM Divisions that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.8-2. T&D, EMTS, and EPM Division Minimum Municipal BMPs

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **T&D, EMTS, and EPM BMP Implementation:** No illicit connections are known to exist on T&D or EMTS facilities, or on EPM projects. Any suspected illicit connections discovered by T&D, EMTS, and EPM staff will be reported to the "Think Blue" Hotline for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **T&D, EMTS, and EPM BMP Implementation:** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 9, below.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**<u>Minimum Municipal BMP:</u>** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **<u>T&D, EMTS, and EPM BMP Implementation:</u>** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite. Any water from processing activities, including reverse osmosis reject water, is contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. If necessary, solids are allowed to settle out prior to disposal, and solids are disposed of to a solid waste dumpster.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**<u>Minimum Municipal BMP:</u>** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **<u>T&D, EMTS, and EPM BMP Implementation:</u>** Municipal vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**<u>Minimum Municipal BMP:</u>** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **<u>T&D, EMTS, and EPM BMP Implementation:</u>** Where maintenance is performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Where sprinkler systems are used, regular maintenance and visual observation of the irrigation system is performed to prevent overspray, leaks, and other problems that could result in runoff to City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. If rain is forecast, sprinklers are temporarily shut off to prevent water waste and runoff from saturated landscaped areas. Irrigation time periods and volumes are adjusted as needed to prevent oversaturation. When watering by hand, the amount of water applied is carefully controlled to prevent irrigation runoff. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed. During maintenance activities, soil and water are prevented from entering the storm drain system. After digging out a line, all soil is returned to the hole and compacted. The area is swept to remove any remaining soil. When bailing out an area after a line break, muddy water is discharged onto a pervious area.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
9	Control air conditioning condensation discharges.	**<u>Minimum Municipal BMP:</u>** Air conditioning condensation discharges shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>T&D, EMTS, and EPM BMP Implementation:</u>** For existing buildings, all condensate lines shall be discharged to the sanitary sewer where feasible. Where not feasible, air conditioning condensation discharges that would otherwise reach the City's storm drain system shall be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Landscaped areas should be at least five feet away from a building, and the landscaped area should slope away from buildings. For new development or building remodels, all condensate lines shall be connected to the sanitary sewer. If air conditioning and chiller units are treated with descaling or anti-algal agent, all flushing agent residues are disposed of properly, and the condensate line is bypassed while flushing unit. When HVAC condenser tubes are flushed, water is captured and disposed of properly. If chemicals are used, the Environmental Services Department, Hazardous Materials Management Program is contacted for disposal options.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
13	Regularly clean and maintain structural BMPs and LID installations, to ensure proper performance.	**Minimum Municipal BMP:** BMPs installed, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** The PUD is responsible for the inspection and maintenance of any treatment control BMPs, or structural BMPs, on T&D and EMTS properties. These installations are inspected, and maintained where necessary, at least once per year. This activity typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**Minimum Municipal BMP:** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** All unpaved areas on T&D or EMTS facilities, or EPM projects, with the potential for erosion have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
Good Housekeeping		
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>T&D, EMTS, and EPM BMP Implementation:</u>** Paved parking lots, roads, and driveways maintained by the Storm Water Division of the Transportation & Storm Water Department are swept at least once per year, and City yards are swept once per month. See Section 7.3.14 for additional details. Where departments or divisions maintain their own paved facilities, sweeping occurs at least once per year. In either case, the entire impervious surface is swept during each sweeping event. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**Minimum Municipal BMP:** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** The PUD is responsible for the inspection and maintenance of any storm drain inlets or building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on T&D and EMTS projects. These structures are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. This activity typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** Trash is picked up around T&D and EMTS grounds, and EPM projects, including trash and recycling containers and dumpsters, as needed to keep them free of accumulated debris. This housekeeping is completed on up to a daily frequency for high use areas. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and placed in dumpsters for disposal. Good housekeeping practices are implemented for onsite activities, which include cleaning any outdoor work areas throughout, and immediately following the activity. See Minimum Municipal BMP 24 for additional details regarding outdoor work areas.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** Liquids are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak.
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** Hazardous materials are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** Materials that are a potential source of pollutants are not stored outdoors, where feasible. In the event that outdoor storage is necessary, materials will be stored in a manner that prevents pollutants from reaching the storm drain system. Methods may include any one, or a combination, of the following practices as needed to prevent pollutant transport in the event that rain is forecast, and as appropriate for the type of material and the location stored: • Placing materials out of the path of runoff; • Containing materials using berms, fiber rolls, gravel bags, or other structural containment; • Diverting runoff around storage areas; and • Providing appropriate cover. Materials will be checked on a regular basis to verify the structural BMPs (such as gravel bags, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** Hazardous materials are be labeled with the material and include additional information as required by other agencies.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
Planning		
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **T&D, EMTS, and EPM BMP Implementation:** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for T&D and EMTS facilities, and EPM projects.
Outdoor Work Areas		
24	Implement controls to minimize pollution from exposed outdoor work areas.	**Minimum Municipal BMP:** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, “Storm Water Contract Language.” Minor pieces of equipment used in operations and

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
		maintenance are taken to City-approved vendors for repair when needed. All activities are performed indoors where feasible, such as pre-painting items, or cutting activities. Where not feasible, the following precautions are taken, as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows into onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**Minimum Municipal BMP:** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** Municipal vehicles and equipment are monitored daily for leaks, and taken to the fleet services vehicle maintenance facility or a City approved equipment repair vendor immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste. See Section 7.3.15 for additional details regarding vehicle maintenance.
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located in close proximity to liquid storage locations, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill and calling the Storm Water Division to assist with cleanup procedures. Emergency phone numbers are posted in a visible place with the spill kit.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
28	Immediately clean up spills.	**<u>Minimum Municipal BMP:</u>** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **<u>T&D, EMTS, and EPM BMP Implementation:</u>** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept, shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area until the spill response staff, is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
		hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**Minimum Municipal BMP:** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **T&D, EMTS, and EPM BMP Implementation:** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
Training and Education		
30	Provide pollution prevention signage for storm drains.	**<u>Minimum Municipal BMP:</u>** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **<u>T&D, EMTS, and EPM BMP Implementation:</u>** All municipal storm drain inlets located on City owned parcels managed by the PUD are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue". Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**<u>Minimum Municipal BMP:</u>** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **<u>T&D, EMTS, and EPM BMP Implementation:</u>** The system used by the T&D, EMTS, and EPM may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**Minimum Municipal BMP:** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **T&D, EMTS, and EPM BMP Implementation:** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the PUD annually, to include training on the implementation of all components of the BMP Plan.
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** Trash is picked up around T&D and EMTS grounds, and EPM projects, including trash cans and dumpsters, as needed to keep them free of loose trash, litter, debris, liquids, powders, and sediment. This housekeeping is completed on up to a daily frequency for high use areas. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.

BMP ID[1]	BMP Title	T&D, EMTS, and EPM Division Minimum Municipal BMPs
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **T&D, EMTS, and EPM BMP Implementation:** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water 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" training.

Division-Specific Training

The PUD creates, executes, and funds training sessions, detailed in Table 7.3.8-3, that cover the implementation of the Minimum Municipal BMPs in Table 7.3.8-2 via an annual training session called Fall Classic. It's mandatory that division employees (excluding administrative staff) attend this training on an annual basis. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.8-3. Division-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Fall Classic (Minimum Municipal BMP Implementation)	Supervisor, Crew	Ongoing

7.3.8.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.8-4, 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). The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility.

Table 7.3.8-4. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

7.3.8.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the responsible Division will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the responsible Division will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, the responsible Division will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is

determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 "Conditionally Allowed Non-Storm Water Discharges" to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.8.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.9 Public Utilities - Water System Operations, Construction, and Maintenance

This section is applicable to the City of San Diego (City) Public Utilities Department (PUD), Water System Operations (WSO) and Water Construction and Maintenance (WCM) Divisions, which operate and maintain the potable water supply, water filtration plants, and distribution systems for the citizens of the City. The goal of this section is to reduce the impact of water operations, maintenance, and construction activities on storm water quality and provide guidance for the protection of water resources. This section contains Minimum Municipal best management practices (BMPs) these Divisions implement for water operations, maintenance, and construction activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

Responsible Department(s) or Division(s):

- Water System Operations Division of the Public Utilities Department
- Water Construction and Maintenance Division of the Public Utilities Department

The water systems for the City include more than 3,000 miles of pipeline, approximately 50 potable water pump stations, three treatment plants, 22 potable water reservoirs, seven 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. PUD systems serve approximately 1.4 million regional customers, and provide water and water storage to other municipalities and water districts in San Diego County. The water system operations inventory includes the aforementioned facilities, an environmental laboratory, and a training facility. The WSO Division also manages the permit requirements for the Reservoirs and Recreation Program special event. Water system operations facilities are listed in the Municipal Facilities Inventory; see Appendix II.A.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.9-1.

Table 7.3.9-1 Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.9.1	E.5.b.	Implement and maintain BMPs.
7.3.9.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.9.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.9.3	Attachment B.1.l.(6)	Report pollutant discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") or receiving waters.
7.3.9.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.9.1 Methods to Implement Minimum Municipal BMPs

Municipal BMPs for the WSO and WCM divisions' facilities and activities are listed in Table 7.3.9-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the WSO and WCM divisions engage in. If future activities are begun by the WSO or WCM divisions that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.9-2. WSO and WCM Divisions Minimum Municipal BMPs

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **WSO and WCM Divisions BMP Implementation:** No illicit connections are known to exist on WSO divisions' facilities. Any suspected illicit connections discovered by WSO and WCM division staff will be reported to the "Think Blue" Hotline for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **WSO and WCM Divisions BMP Implementation:** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 9, below.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**<u>Minimum Municipal BMP:</u>** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Any water from processing activities is contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite. If necessary, solids are allowed to settle out prior to disposal, and solids are disposed of to a solid waste dumpster.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**<u>Minimum Municipal BMP:</u>** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** Municipal vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
5	Properly dispose of water from fire sprinkler maintenance activities.	**<u>Minimum Municipal BMP:</u>** Fire sprinkler system discharges containing corrosion inhibitors, fire suppressants, or antifreeze shall be disposed through the sanitary sewer system, not the storm drain system. Fire sprinkler system discharges without corrosion inhibitors, fire suppressants, or antifreeze shall be disposed through the sanitary sewer, if practicable. When not practicable to discharge to the sanitary sewer system, the water shall not be discharged unless adequate precautions have been taken to prevent the transport of pollutants to the storm drain system. SDMC §43.0304 & §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>WSO and WCM Divisions BMP Implementation:</u>** Where maintenance is performed by municipal staff, fire sprinkler system effluent is discharged to the sanitary sewer. Where maintenance is performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language."

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
9	Control air conditioning condensation discharges.	**<u>Minimum Municipal BMP:</u>** Air conditioning condensation discharges shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>WSO and WCM Divisions BMP Implementation:</u>** For existing buildings, all condensate lines shall be discharged to the sanitary sewer where feasible. Where not feasible, air conditioning condensation discharges that would otherwise reach the City's storm drain system shall be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Landscaped areas should be at least five feet away from a building, and the landscaped area should slope away from buildings. For new development or building remodels, all condensate lines shall be connected to the sanitary sewer. If air conditioning and chiller units are treated with descaling or anti-algal agent, all flushing agent residues are disposed of properly, and the condensate line is bypassed while flushing unit. When heating, ventilating, and air conditioning (HVAC) condenser tubes are flushed, water is captured and disposed of properly. If chemicals are used, the Environmental Services Department, Hazardous Materials Management Program is contacted for disposal options.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
13	Regularly clean and maintain structural BMPs and LID installations, to ensure proper performance.	**Minimum Municipal BMP:** BMPs installed, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **WSO and WCM Divisions BMP Implementation:** The PUD is responsible for the inspection and maintenance of any treatment control BMPs, or structural BMPs, on WSO and WCM Divisions properties and projects. These installations are inspected, and maintained where necessary, at least once per year. This activity typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**Minimum Municipal BMP:** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **WSO and WCM Divisions BMP Implementation:** All unpaved areas on WSO and WCM divisions facilities and projects with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
Good Housekeeping		
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** Paved parking lots, roads, and driveways maintained by the Storm Water Division of the Transportation & Storm Water Department are swept at least once per year, and City yards (such as the Chollas Operations Yard) are swept once per month. See Section 7.3.14 for additional details. Where departments or divisions maintain their own paved facilities, sweeping occurs at least once per year. In either case, the entire impervious surface is swept during each sweeping event. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**Minimum Municipal BMP:** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **WSO and WCM Divisions BMP Implementation:** The PUD is responsible for the inspection and maintenance of any storm drain inlets or building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on WSO and WCM Divisions properties and projects. These structures are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. These activities typically occur during the dry season, between May and September, with additional maintenance performed throughout the year as needed.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **WSO and WCM Divisions BMP Implementation:** Trash is picked up around WSO and WCM divisions' grounds, including trash and recycling containers and dumpsters, as needed to keep them free of accumulated debris. This activity is completed on up to a daily frequency for high use areas. Good housekeeping practices are implemented for onsite activities, which include cleaning any outdoor work areas throughout, and immediately following the activity. See Minimum Municipal BMP 24 for additional details regarding outdoor work areas.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**<u>Minimum Municipal BMP:</u>** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** Liquids are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak.
19	Properly store and dispose of hazardous substances.	**<u>Minimum Municipal BMP:</u>** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** Hazardous materials are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system. SDMC §43.0307(a). **WSO and WCM Divisions BMP Implementation:** Materials that are a potential source of pollutants are not stored outdoors, where feasible. In the event that outdoor storage is necessary, materials will be stored in a manner that prevents pollutants from reaching the storm drain system. Methods may include any one, or a combination, of the following practices as needed to prevent pollutant transport in the event that rain is forecast, and as appropriate for the type of material and the location stored: • Placing materials out of the path of runoff; • Containing materials using berms, fiber rolls, gravel bags, or other structural containment; • Diverting runoff around storage areas; and • Providing appropriate cover. Materials will be checked on a regular basis to verify the structural BMPs (such as gravel bags, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **WSO and WCM Divisions BMP Implementation:** Hazardous materials are be labeled with the material and include additional information as required by other agencies.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
		Planning
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **WSO and WCM Divisions BMP Implementation:** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for WSO and WCM divisions' facilities and projects.
		Outdoor Work Areas
24	Implement controls to minimize pollution from exposed outdoor work areas.	**Minimum Municipal BMP:** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **WSO and WCM Divisions BMP Implementation:** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Minor pieces of equipment used in operations and

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
		maintenance are taken to City-approved vendors for repair when needed. All activities are performed indoors where feasible, such as pre-painting items, or cutting activities. Where not feasible, the following precautions are taken, as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows into onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**<u>Minimum Municipal BMP:</u>** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** Municipal vehicles and equipment are monitored daily for leaks, and taken to the fleet services vehicle maintenance facility or a City approved equipment repair vendor immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste. See Section 7.3.15 for additional details regarding vehicle maintenance.
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**<u>Minimum Municipal BMP:</u>** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located in close proximity to liquid storage locations, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill and calling the Storm Water Division to assist with cleanup procedures. Emergency phone numbers are posted in a visible place with the spill kit.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
28	Immediately clean up spills.	**<u>Minimum Municipal BMP:</u>** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **<u>WSO and WCM Divisions' BMP Implementation:</u>** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept, shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area until the spill response staff, is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
		hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**<u>Minimum Municipal BMP:</u>** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
Training and Education		
30	Provide pollution prevention signage for storm drains.	**<u>Minimum Municipal BMP:</u>** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** All municipal storm drain inlets located on City owned parcels managed by the PUD are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue". Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**<u>Minimum Municipal BMP:</u>** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** The system used by the WSO and WCM divisions may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**Minimum Municipal BMP:** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **WSO and WCM Divisions BMP Implementation:** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the WSO and WCM annually, to include training on the implementation of all components of the BMP Plan.
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **WSO and WCM Divisions BMP Implementation:** Trash and debris are removed throughout WSO and WCM divisions' facilities daily through pickup or sweeping activities, including around dumpsters, to ensure all areas remain free of loose litter, debris, liquids, powders, and sediment. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.

BMP ID[1]	BMP Title	WSO and WCM Divisions Minimum Municipal BMPs
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**<u>Minimum Municipal BMP:</u>** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **<u>WSO and WCM Divisions BMP Implementation:</u>** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water 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” training.

WSO and WCM Divisions Specific Training

The PUD creates, executes, and funds training sessions, detailed in Table 7.3.9-3, that cover the implementation of the Minimum Municipal BMPs in Table 7.3.9-2, via an annual training session called Spring Training. This training session is mandatory for all WSO and WCM divisions' staff, excepting administrative personnel. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.9-3. WSO and WCM Divisions – Specific Minimum Municipal BMP Training

Training Module/Item	Staff Level	Schedule
Storm Water Pollution Prevention and Minimum Municipal BMP Implementation	Supervisor and Crew members	Ongoing

7.3.9.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.9-4, 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). The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility.

Table 7.3.9-4. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

7.3.9.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the responsible Division will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the responsible Division will develop an anticipated schedule for corrections to be made, and

provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, the responsible Division will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 “Conditionally Allowed Non-Storm Water Discharges” to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.9.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.10 Qualcomm Stadium[3]

This section is applicable to the City of San Diego (City) Qualcomm 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 "Qualcomm Stadium"). The goal of this section is to reduce the impacts of Qualcomm Stadium events and operations on receiving waters. This section contains Minimum Municipal best management practices (BMPs) Qualcomm Stadium will implement for operations and maintenance activities, in addition to inventory, inspection, pollutant discharge reporting, education and annual reporting requirements applicable to Stadium activities.

Qualcomm Stadium is a municipal facility located at 9449 Friars Road, San Diego. Qualcomm Stadium is listed in the Municipal Facilities Inventory; see Appendix II.A.

Responsible Department(s) or Division(s):

- Qualcomm Stadium

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.10-1.

[3] Note that Qualcomm Stadium was renamed to SDCCU Stadium in September 2017.

Table 7.3.10-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.10.1	E.5.b.	Implement and maintain BMPs.
7.3.10.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.10.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.10.3	Attachment B.1.l.(6)	Report pollutant discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") or receiving waters.
7.3.10.4	E.8, F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.10.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for Qualcomm Stadium are listed in Table 7.3.10-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX) for all activities Qualcomm Stadium engages in. If future activities are begun by Qualcomm Stadium that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.10-2. Qualcomm Stadium Minimum Municipal BMPs

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **Qualcomm Stadium BMP Implementation:** No illicit connections are known to exist at Qualcomm Stadium. Any suspected illicit connections discovered by Qualcomm Stadium staff will be reported to the "Think Blue" Hotline for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **Qualcomm Stadium BMP Implementation:** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 11, below.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**<u>Minimum Municipal BMP:</u>** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **<u>Qualcomm Stadium BMP Implementation:</u>** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning occurs following every event, and all wash water is contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite. Any water from processing activities, such as tile cutting, is contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. If necessary, solids are allowed to settle out prior to disposal, and solids are disposed of to a solid waste dumpster.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**Minimum Municipal BMP:** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **Qualcomm Stadium BMP Implementation:** Golf carts are washed at the mechanic's yard, where water is discharged to pervious areas. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Municipal vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities. All Parking Lot Event Permits include language prohibiting vehicle washing.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**<u>Minimum Municipal BMP:</u>** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **<u>Qualcomm Stadium BMP Implementation:</u>** Where maintenance is performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Where sprinkler systems are used, regular maintenance and visual observation of the irrigation system is performed to prevent overspray, leaks, and other problems that could result in runoff to City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. If rain is forecast, sprinklers are temporarily shut off to prevent water waste and runoff from saturated landscaped areas. Irrigation time periods and volumes are adjusted as needed to prevent oversaturation. When watering by hand, the amount of water applied is carefully controlled to prevent irrigation runoff. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed. During maintenance activities, soil and water are prevented from entering the storm drain system. After digging out a line, all soil is returned to the hole and compacted. The area is swept to remove any remaining soil. When bailing out an area after a line break, muddy water is discharged onto a pervious area.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
7	Eliminate nursery irrigation discharges.	**Minimum Municipal BMP:** All irrigation water and associated pollutants from nurseries, garden centers, and similar facilities shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **Qualcomm Stadium BMP Implementation:** Sod grown for field patching activities is grown over a pervious area, and watered by hand, with the volume carefully metered using a control nozzle to avoid oversaturation.
9	Control air conditioning condensation discharges.	**Minimum Municipal BMP:** Air conditioning condensation discharges shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **Qualcomm Stadium BMP Implementation:** For existing buildings, all condensate lines shall be discharged to the sanitary sewer where feasible. Where not feasible, air conditioning condensation discharges that would otherwise reach the City's storm drain system shall be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Landscaped areas should be at least five feet away from a building, and the landscaped area should slope away from buildings. For new development or building remodels, all condensate lines shall be connected to the sanitary sewer. If air conditioning and chiller units are treated with descaling or anti-algal agent, all flushing agent residues are disposed of properly, and the condensate line is bypassed while flushing unit. When heating, ventilating, and air conditioning (HVAC) condenser tubes are flushed, water is captured and disposed of properly. If chemicals are used, ESD-HMMP is contacted for disposal options.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
11	Eliminate floor mat cleaning discharges.	**Minimum Municipal BMP:** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **Qualcomm Stadium BMP Implementation:** Floor mats are cleaned offsite by an outside contractor.
13	Regularly clean and maintain structural BMPs and LID installations, to ensure proper performance.	**Minimum Municipal BMP:** BMPs installed, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Qualcomm Stadium is responsible for the inspection and maintenance of any treatment control BMPs, or structural BMPs, on Qualcomm Stadium property. These installations are inspected, and maintained where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**<u>Minimum Municipal BMP:</u>** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **<u>Qualcomm Stadium BMP Implementation:</u>** All unpaved areas at Qualcomm Stadium with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
Good Housekeeping		
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning, the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>Qualcomm Stadium BMP Implementation:</u>** Parking lots and driveways are swept after every event, and occasionally before events. Areas are also swept after rain event where flooding has occurred. Wet cleaning occurs following every event, and wash water is managed in accordance with Minimum Municipal BMP 3, above.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**Minimum Municipal BMP:** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Qualcomm Stadium is responsible for the inspection and maintenance of any storm drain inlets or building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on Qualcomm Stadium property. Building drain assets are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed. Storm drain inlets are inspected weekly, and cleaned if accumulated debris is noted. Mats, screens, and socks are used to prevent debris from entering drains, and are maintained regularly. Event vendors also temporarily cover drains to prevent debris entry, as applicable.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Trash is picked up around Qualcomm Stadium, including trash and recycling containers and dumpsters, during and following all events. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and placed in dumpsters.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Liquids are stored within buildings or other secondary containment structures where they will not drain to outdoor areas in the event of a spill or leak.
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Hazardous materials are stored within buildings, or within secondary containment and cover, where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Older equipment that becomes rusty will be painted to prevent storm water contact. Soil piles are contained using Tackifier, applied annually. Materials are checked on a regular basis to verify the structural BMPs (such as roofs, awnings, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Hazardous materials are be labeled with the material and include additional information as required by other agencies.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
Pesticide and Fertilizer Management		
22	Properly manage pesticides and fertilizers.	**<u>Minimum Municipal BMP:</u>** Pesticides and fertilizers shall be applied in strict accordance with manufacturer's label, as authorized by U.S. Environmental Protection Agency. Chemicals shall be stored safely in covered and contained areas. Waste products shall be disposed of in accordance with the manufacturer's label and applicable hazardous waste regulations. The use of integrated pest management principles is encouraged to reduce or eliminate use of chemicals. SDMC §43.0307(a). **<u>Qualcomm Stadium BMP Implementation:</u>** Pesticides are rarely applied, and only by licensed pesticide handlers. Fertilizers are applied sparingly, directly to the intended area, and in accordance with manufacturer's directions as approved by the USEPA, at times when rain is not predicted and irrigation is not scheduled. Any pesticides or fertilizers that are spilled, or fall outside their intended area, are removed immediately and thoroughly. Where possible, integrated pest management methods are used, including: No controls, physical/mechanical controls, environmental controls (mulching, pest-resistant vegetation, prescribed burns), biological controls (predators, parasites, etc.), less toxic chemical controls (e.g., soaps and oils) and/or hot water. Where chemical controls are necessary, the least toxic chemicals that will do the job (e.g., biodegradable products) are used. Pesticides and fertilizers are applied and handled, in accordance with existing state regulations (California Title 3, Division 6, Pesticides and Pest Control Operations), and detailed records are kept. Unused chemicals are collected and disposed of as a regulated waste. Pest control application procedures are reviewed annually, and conform to the current San Diego County Department of Agriculture regulations.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
Planning		
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**<u>Minimum Municipal BMP:</u>** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **<u>Qualcomm Stadium BMP Implementation:</u>** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for Qualcomm Stadium.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
Outdoor Work Areas		
24	Implement controls to minimize pollution from exposed outdoor work areas.	**<u>Minimum Municipal BMP:</u>** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **<u>Qualcomm Stadium BMP Implementation:</u>** Maintenance of vehicles and equipment is conducted at the mechanic's yard. No storm drain system connections exist in the work area. Drip pans and other tools are utilized to reduce pollution potential. The work area is cleaned at the conclusion of the activity to remove any accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. During painting activities, paint is mixed, and equipment cleaned, in the east tunnel, which drains to the sanitary sewer. All paint containers are equipped with secure lids. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**Minimum Municipal BMP:** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Vehicles and equipment are routinely monitored for leaks, and serviced immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste.
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located in close proximity to liquid storage locations, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill and calling the Storm Water Division of the Transportation & Storm Water Department to assist with cleanup procedures. Emergency phone numbers are posted in a visible place with the spill kit.
28	Immediately clean up spills.	**Minimum Municipal BMP:** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
		City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **<u>Qualcomm Stadium BMP Implementation:</u>** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept, shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area until the spill response staff, is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**<u>Minimum Municipal BMP:</u>** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **<u>Qualcomm Stadium BMP Implementation:</u>** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. Mats, screens, and socks are used to prevent debris from entering drains, and are maintained regularly. Event vendors also temporarily cover drains to prevent pollutant discharge, as applicable.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
Training and Education		
30	Provide pollution prevention signage for storm drains.	**<u>Minimum Municipal BMP:</u>** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **<u>Qualcomm Stadium BMP Implementation:</u>** All municipal storm drain inlets located on City owned parcels managed by Qualcomm Stadium are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue". Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**<u>Minimum Municipal BMP:</u>** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **<u>Qualcomm Stadium BMP Implementation:</u>** The system used by Qualcomm Stadium may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**<u>Minimum Municipal BMP:</u>** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **<u>Qualcomm Stadium BMP Implementation:</u>** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the Qualcomm Stadium annually, to include training on the implementation of all components of the BMP Plan.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**<u>Minimum Municipal BMP:</u>** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **<u>Qualcomm Stadium BMP Implementation:</u>** Trash and debris are removed throughout Qualcomm Stadium daily through pickup or sweeping activities, including around dumpsters, to ensure all areas remain free of loose litter, debris, liquids, powders, and sediment. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. The trash compactor drains to the sanitary sewer if leaks occur. Sufficient disposal containers are provided to meet volume demands. 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. Dumpsters are repaired or replaced if found to leak.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
34	Properly store and dispose of green waste.	**Minimum Municipal BMP:** Green waste shall be properly stored and disposed of such that it will not be transported to the storm drain system by storm water or non-storm water runoff. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Green waste is collected and placed into dumpsters after regular landscape maintenance activities. Periodically, green waste dumpsters are rented from the Environmental Services Department in anticipation of larger landscape maintenance projects, so the wastes will be disposed of to the green waste section of the landfill. Landscape activities are scheduled to occur during dry weather, where feasible. Temporary green waste dumpsters are placed away from storm drains and concentrated flow paths, and covered in the event of rain.
35	Manage animal waste and animal washing in a manner that prevents transport of wastes and wash water off-site.	**Minimum Municipal BMP:** Animals and animal waste shall be managed and stored in a manner that prevents animal supplies, waste, and wash water from entering the storm drain system. Collect and dispose of animal waste through trash receptacles or the sanitary sewer, as appropriate. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Animal wastes are removed, bagged, and placed into waste receptacles during regular facility housekeeping activities, in accordance with Minimum Municipal BMP 17, above.

BMP ID[1]	BMP Title	Qualcomm Stadium Minimum Municipal BMPs
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.
37	Cooking oil waste shall be managed to prevent illicit discharges.	**Minimum Municipal BMP:** Waste cooking oil shall be managed in a manner that prevents discharges SDMC §43.0307(a). **Qualcomm Stadium BMP Implementation:** All waste cooking oil bins are stored indoors.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water 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".

Qualcomm Stadium-Specific Training

Qualcomm Stadium will create, execute, and fund training sessions that cover the implementation of the Minimum Municipal BMPs in Table 7.3.10-3. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.10-3. Qualcomm Stadium-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
How to train Employees regarding Minimum Municipal BMPs for Stadium seat cleaning	Supervisor, Crew	Ongoing

Training Module/Item	Staff Level	Schedule
Parking lot cleanup Minimum Municipal BMPs	Supervisor, Crew	Ongoing
Equipment cleaning Minimum Municipal BMPs	Crew	Ongoing
Pesticide/Chemical application Minimum Municipal BMPs for Stadium fields and landscaping	Supervisor, Crew	Ongoing
Soil Storage and Stabilization	Supervisors	Ongoing
Minimum Municipal BMPs for Vendor Disposal activities	Contractors and Vendors	Ongoing

Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by Qualcomm Stadium in consultation with the Storm Water Division (e.g., including the "Think Blue" logo on materials). Table 7.3.10-4 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 7.3.10-4. Department External Outreach Activities by Target Audience

Activity	Target Audience(s)*	Schedule
Visitor information provided and posted in various locations on proper disposal of trash	4	Ongoing
Minimum Municipal BMPs for stadium vendors	3	Ongoing
"Think Blue" message on Friars Rd. marquis	1-4	Ongoing
Provide vendors and contractors access to Stadium activity specific Minimum Municipal BMPs	1,3,4	Ongoing

* Denoted as follows:

13. Industrial Owners and Operators
14. Construction Site Owners and Developers
15. Commercial Owners and Operators
16. Residential Community, General Public, and School Children

7.3.10.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.10-5, 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). The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility.

Table 7.3.10-5. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

Qualcomm Stadium staff also 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 are effectively being implemented. Stadium staff will note any deficiencies during the inspection and coordinate with the Event Hosts/Organizers to resolve the issue.

7.3.10.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, Qualcomm Stadium will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, Qualcomm Stadium will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, Qualcomm Stadium will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher-ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 "Conditionally Allowed Non-Storm Water Discharges" to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.10.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The

fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.11 Recreational Lands and Facilities

This section is applicable to the City of San Diego (City) Park and Recreation Department. 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 municipal separate storm sewer system (MS4; hereafter, "storm drain system") and receiving waters.

The Park and Recreation Department is responsible for landscape assets associated with treatment control best management practices (BMPs), including incidental surface trash and debris removal around landscaping, but not including the substrate material in which landscape assets grow in cases where the substrate material is part of the functional design of the treatment control BMP (i.e., the substrate material is designed to treat and/or store runoff). Landscape assets include landscaping related assets associated with structural BMPs, such as plants, trees, and irrigation systems, that primarily provide recreational and/or aesthetic levels of service but which are not essential to the drainage and/or treatment design performance of the structural BMP.

Responsible Department(s) or Division(s):

- Park and Recreation Department

The goal of this section is to reduce the impact of Park and Recreation Department operations and maintenance activities on storm water quality and provide guidance for the protection of water quality and receiving waters. This section contains Minimum Municipal BMPs 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. Park and Recreation Department facilities are listed in the Municipal Facilities Inventory; see Appendix II.A, including the City-owned "Portland Loo" restroom locations, for which the Park and Recreation Department is the asset owner and responsible for performing the routine inspections and managing the cleaning contract, and the Public Works Department, Facilities Maintenance Division, handles structural repairs.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.11-1.

Table 7.3.11-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.11.1	E.5.b.	Implement and maintain BMPs.
7.3.11.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.11.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.11.3	Attachment B.1.l(6)	Report pollutant discharges to the storm drain system or receiving waters.
7.3.11.4	E.8, F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.11.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for Park and Recreation Department facilities and activities are listed in Table 7.3.11-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the Park and Recreation Department engages in. If future activities are begun by the Park and Recreation Department that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Additionally, Park and Recreation Department facilities that fall within the La Jolla Area of Special Biological Significance (ASBS) have been outfitted with specific structural and non-structural BMPs to effectively control soil erosion, prevent pesticide discharges, limit trash, and reduce runoff from parking areas. These efforts are detailed in the Mission Bay/La Jolla Water Quality Improvement Plan.

Table 7.3.11-2. Park and Recreation Department Minimum Municipal BMPs

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **Park and Recreation Department BMP Implementation:** No illicit connections are known to exist on Park and Recreation Department facilities. Any suspected illicit connections discovered by Park and Recreation staff will be reported to the "Think Blue" Hotline for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **Park and Recreation Department BMP Implementation:** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 11, below.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**Minimum Municipal BMP:** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **Park and Recreation Department BMP Implementation:** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wash water from the wet cleaning of outdoor concrete, where necessary, is discharged to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Outdoor showers located at shoreline parks are either connected to the sanitary sewer, or drain into the pervious areas adjacent to the showers for infiltration. There is no discharge to the storm drain system. No processing activities occur on Park and Recreation facilities.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**Minimum Municipal BMP:** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **Park and Recreation Department BMP Implementation:** Municipal vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities. Mowers are washed in wash racks, or other areas that discharge to the sewer system, at Park and Recreation Department maintenance yards.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**<u>Minimum Municipal BMP:</u>** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **<u>Park and Recreation Department BMP Implementation:</u>** Where sprinkler systems are used, visual observation of the irrigation system is performed following mowing events, to ensure mowing did not result in broken sprinkler heads. If damage occurred, a service request is called in. Signage is also posted in some areas, and an online reporting form is available, to encourage members of the public to report leaks immediately. The spray pattern is also observed periodically to prevent overspray that could result in runoff to City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. If rain is forecast, sprinklers are temporarily shut off to prevent water waste and runoff from saturated landscaped areas. Irrigation time periods and volumes are adjusted as needed to prevent oversaturation. When watering by hand, the amount of water applied is carefully controlled to prevent irrigation runoff. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed. During maintenance activities, soil and water are prevented from entering the storm water system. After digging out a line, all soil is returned to the hole and compacted. The area is swept to remove any remaining soil. When bailing out an area after a line break, muddy water is discharged onto a pervious area.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
7	Eliminate nursery irrigation discharges.	**<u>Minimum Municipal BMP:</u>** All irrigation water and associated pollutants from nurseries, garden centers, and similar facilities shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **<u>Park and Recreation Department BMP Implementation:</u>** Native plants grown for open space restoration activities are grown over a pervious area, and watered by hand, with the volume carefully metered using a control nozzle to avoid oversaturation. The central nursery has outfitted their stock with drip lines to avoid overwatering of the nursery stock. All plants are grown over pervious ground to further reduce the likelihood of discharge.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
8	Properly dispose of discharges from swimming pools, spas, fountains, reflective pools, ponds, and filter backwash.	**<u>Minimum Municipal BMP:</u>** Swimming pools, spas, fountains, reflective pools, ponds, and filter backwash water shall be properly disposed of to prevent pollutants from entering the storm drain system. SDMC §43.0304 & §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>Park and Recreation Department BMP Implementation:</u>** Discharge swimming pools, spas, reflective pools, ponds fountain water either by (1) discharging water to the sanitary sewer system; or (2) slowly draining water to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system, open space areas, or any adjacent property. Discharge to the storm drain system is only permissible if the water is dechlorinated, has a pH in the 7-8 range, is within the ambient temperature, has no algae or suspended solids, and is not saline. Dispose of filter backwash water only to the sanitary sewer system, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Discharge of saline swimming pool water to City storm drains, curb gutters, or any other part of the City's storm drain system is prohibited unless the saline water can be discharged through a pipe or concrete channel directly to a naturally saline water body (e.g., the Pacific Ocean). Prior to discharging large quantities of water to the sanitary sewer system, contact the PUD at 858-654-4100 to determine whether the discharge is allowed and applicable permitting requirements.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
11	Eliminate floor mat cleaning discharges.	**Minimum Municipal BMP:** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **Park and Recreation Department BMP Implementation:** Floor mats are vacuumed, swept, or shaken out over a pervious surface.
13	Regularly clean and maintain structural BMPs and LID installations, to ensure proper performance.	**Minimum Municipal BMP:** BMPs installed, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** The Storm Water Division of the Transportation & Storm Water Department is responsible for the maintenance of all City-owned structural BMPs, excepting those owned by the Public Utilities Department. The Storm Water Division does not maintain the vegetation of structural BMPs such as vegetated swales or bioretention areas, for which any necessary mowing, trimming, or other regular maintenance is conducted during regular landscaping activities, when these structural BMPs are located on facilities that are the responsibility of other divisions or departments. The Storm Water Division does maintain the substrate and other operational components of such structural BMPs. Treatment control BMPs, or structural BMPs, are typically cleaned in September and/or March by the responsible City division, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer. Structural BMPs are inspected at least annually, and maintained as necessary by the responsible City division.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**<u>Minimum Municipal BMP:</u>** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **<u>Park and Recreation Department BMP Implementation:</u>** All unpaved areas on Park and Recreation Department facilities with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
Good Housekeeping		
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>Park and Recreation Department BMP Implementation:</u>** Paved parking lots, roads, and driveways maintained by the Storm Water Division are swept at least once per year, and City yards are swept once per month. See Section 7.3.14 for additional details. Where departments or divisions maintain their own paved facilities, sweeping occurs at least once per year. In either case, the entire impervious surface is swept during each sweeping event. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**Minimum Municipal BMP:** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Building drain assets, which include public building-related drainage items such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk, on City owned parcels managed by the Park and Recreation Department shall be inspected and cleaned of debris or other foreign material at least once per year by the Storm Water Division. Collected debris shall be disposed of appropriately. All storm drain system structures (catch basins, storm drain inlets, open channels, etc.) located on City owned parcels managed by the Park and Recreation Department are inspected and cleaned of debris or other foreign material generally annually by the Storm Water Division. See Section 7.3.13 for additional details regarding storm drain structure cleaning.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Trash is picked up around Park and Recreation grounds, including around trash and recycling containers and dumpsters, daily to keep them free of accumulated debris. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and placed in dumpsters for disposal, or used onsite as a soil amendment. Good housekeeping practices are implemented for onsite activities, which include cleaning any outdoor work areas throughout, and immediately following the activity. See Minimum Municipal BMP 24 for additional details regarding outdoor work areas.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Liquids are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak.
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Hazardous materials are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Soil and greenery stockpiles are contained using wattles, and other materials are covered with tarps if rain is forecast, as applicable. Materials are stored on pervious ground, away from the path of runoff, to prevent pollutant transport. Materials will be checked on a regular basis to verify the structural BMPs (such as roofs, awnings, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Hazardous materials are be labeled with the material and include additional information as required by other agencies.
Pesticide and Fertilizer Management		
22	Properly manage pesticides and fertilizers.	**Minimum Municipal BMP:** Pesticides and fertilizers shall be applied in strict accordance with manufacturer's label, as authorized by U.S. Environmental Protection Agency. Chemicals shall be stored safely in covered and contained areas. Waste products shall be disposed of in accordance with the manufacturer's label and applicable hazardous waste regulations. The use of integrated pest management principles is encouraged to reduce or eliminate use of chemicals. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** City employees in approved classifications who apply pesticides must be licensed pesticide handlers. These employees are trained in the proper storage, handling and disposal of

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
		pesticides. Where outside contractors are used, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Pesticide applications are based on the recommendations of a licensed Pest Control Advisor. Fertilizers and pesticides are applied sparingly, directly to the intended area, and in accordance with manufacturer's directions as approved by the USEPA, at times when rain is not predicted and irrigation is not scheduled. Any pesticides or fertilizers that are spilled, or fall outside their intended area, are removed immediately and thoroughly. Where possible, integrated pest management methods are used, including: No controls, physical/mechanical controls, environmental controls (mulching, pest-resistant vegetation, prescribed burns), biological controls (predators, parasites, etc.), less toxic chemical controls (e.g., soaps and oils) and/or hot water. Where chemical controls are necessary, the least toxic chemicals that will do the job (e.g., biodegradable products) are used. Pesticides and fertilizers are applied and handled, in accordance with existing state regulations (California Title 3, Division 6, Pesticides and Pest Control Operations), and detailed records are kept. Unused chemicals are collected and disposed of as a regulated waste. Pest control application procedures are reviewed annually, and conform to the current San Diego County Department of Agriculture regulations.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
		Planning
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan, shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **Park and Recreation Department BMP Implementation:** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for Park and Recreation Department facilities.
		Outdoor Work Areas
24	Implement controls to minimize pollution from exposed outdoor work areas.	**Minimum Municipal BMP:** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Minor pieces of equipment used in operations and

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
		maintenance, such as mowers and chainsaws, are repaired at indoor Park and Recreation equipment repair shops when needed. Where performing activities indoors is not feasible, the following precautions are taken, as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows into onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**<u>Minimum Municipal BMP:</u>** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0304(a); 43.0307(a). **<u>Park and Recreation Department BMP Implementation:</u>** Municipal vehicles and equipment are monitored daily for leaks, and taken to the fleet services vehicle maintenance facility, a Park and Recreation Department equipment repair shop, or a City approved equipment repair vendor immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste. See Section 7.3.15 for additional details regarding vehicle maintenance.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located in close proximity to liquid storage locations, and on vehicles, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill and calling a pre-determined vendor or City department to assist with cleanup procedures. Emergency phone numbers are posted in a visible place with the spill kit.
28	Immediately clean up spills.	**Minimum Municipal BMP:** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept,

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
		shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area until the spill response staff, or a designated vendor or City department, is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**Minimum Municipal BMP:** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **Park and Recreation Department BMP Implementation:** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
Training and Education		
30	Provide pollution prevention signage for storm drains.	**<u>Minimum Municipal BMP:</u>** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0304(a). **<u>Park and Recreation Department BMP Implementation:</u>** All municipal storm drain inlets located on City owned parcels managed by the Park and Recreation Department are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue". Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**<u>Minimum Municipal BMP:</u>** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **<u>Park and Recreation Department BMP Implementation:</u>** The system used by the Park and Recreation Department may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**Minimum Municipal BMP:** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **Park and Recreation Department BMP Implementation:** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the Park and Recreation Department annually, to include training on the implementation of all components of the BMP Plan.
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Trash is picked up around Park and Recreation grounds, including around trash and recycling containers and dumpsters, daily to keep them free of accumulated debris. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
34	Properly store and dispose of green waste.	**Minimum Municipal BMP:** Green waste shall be properly stored and disposed of such that it will not be transported to the storm drain system by storm water or non-storm water runoff. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Green waste is collected and placed into dumpsters after regular landscape maintenance activities. Interim storage is located in an area contained by an earthen berm, where Environmental Services Department (ESD) collects the wastes for disposal to the green waste section of the landfill. Landscape activities are scheduled to occur during dry weather, where feasible. Green waste dumpsters are placed away from storm drains and concentrated flow paths, and covered in the event of rain.
35	Manage animal waste and animal washing in a manner that prevents transport of wastes and wash water off-site.	**Minimum Municipal BMP:** Animals and animal waste shall be managed and stored in a manner that prevents animal supplies, waste, and wash water from entering the storm drain system. Collect and dispose of animal waste through trash receptacles or the sanitary sewer, as appropriate. SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Signage reminding pet owners of their responsibility to collect and properly dispose of pet wastes is placed in parks and open space areas. Signs in open space areas also encourage “pack-in, pack-out” practices. Waste collection stations are installed where pet waste is noted to accumulate in regularly serviced areas. Animal wastes are also removed, bagged, and placed into waste receptacles during regular facility housekeeping activities, in accordance with Minimum Municipal BMP 17, above.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**<u>Minimum Municipal BMP:</u>** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **<u>Park and Recreation Department BMP Implementation:</u>** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Waste receptacles that are not outfitted with lids are emptied daily to prevent the discharge of contaminated storm water. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.

BMP ID[1]	BMP Title	Park and Recreation Department Minimum Municipal BMPs
37	Cooking oil waste shall be managed to prevent illicit discharges.	**Minimum Municipal BMP:** Waste cooking oil shall be managed in a manner that prevents discharges SDMC §43.0307(a). **Park and Recreation Department BMP Implementation:** Restaurants on Park and Recreation Department facilities will be instructed to utilize indoor waste cooking oil bins where appropriate facilities exist to maintain compliance with health, fire, and other applicable department codes. Where indoor facilities are incompatible with such codes, waste containers shall be kept within a covered and/or contained area to prevent residual waste transport in runoff. The chosen storage option (cover, containment, or both) shall be sufficient to prevent the discharge of any storm water that has contacted any residual waste oil on the bin or surrounding areas. This means that overhead cover is sufficient to prevent any storm water contact with the bin, the containment is of a high enough capacity to retain all storm water that has contacted the bin, or both in conjunction will prevent any discharge of residual waste oil, even during heavy rains and/or windy conditions. Areas surrounding the waste container that are not covered or contained shall be kept free of residual waste oil. Any oil spilled in outdoor areas during grease transport or collection activities will be cleaned immediately, in accordance with Minimum Municipal BMP 28.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water 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”.

Park and Recreation Department-Specific Training

The Park and Recreation Department will create, execute, and fund training sessions that cover the implementation of the Minimum Municipal BMPs in Table 7.3.11-3. The Storm

Water Division can assist departments with the development of training materials at their request.

Table 7.3.11-3. Park and Recreation Department-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Storm Water Minimum Municipal BMPs as covered in Park and Recreation BMP Handbook	All Park and Recreation Field Supervisors and Employees	Ongoing

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 Department in consultation with the Storm Water Division (e.g., including the "Think Blue" logo on materials). Table 7.3.11-4 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 7.3.11-4. Department External Outreach Activities by Target Audience

Activity	Target Audience(s)*	Schedule
Issuing park permits	Patrons 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	Patrons who request to reserve parks for their activities	Ongoing
Issuing department Minimum Municipal BMPs to the permittee for potential pollutants resulting from the activity	Patrons 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 Minimum Municipal 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,	General public who enter the recreation facilities or who apply for permits	Ongoing

Activity	Target Audience(s)*	Schedule
bulletin boards, and/or literature racks containing materials available to the general public who enter the facility		

7.3.11.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.11-5, 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 7.3.11-5. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

Additionally, the Park and Recreation Department has identified the facilities within its inventory whose activities are closely aligned with those of industrial or commercial businesses. These facilities are denoted within the municipal facility inventory, provided as Appendix II.A. The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility.

Park and Recreation Department will also 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 the Park and Recreation BMP Manual 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.

7.3.11.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the Park and Recreation Department will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the Park and Recreation Department will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of

improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, the Park and Recreation Department will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher-ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 “Conditionally Allowed Non-Storm Water Discharges” to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.11.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.12 Special Events

This section is applicable to the City of San Diego (City) Office of Special Events, which issues permits for special events as defined in San Diego Municipal Code, Sections 22.4001 to 22.4038 (Special Events Ordinance). Through the special event application process, the Office of Special Events provides event hosts/organizers (hereafter, "applicants") with guidelines and example best management practices (BMPs) to ensure appropriate pollution prevention measures are taken.

The goal of this section is to outline the measures taken by the Office of Special Events to reduce the impact of special events on storm water quality. It contains the Minimum Municipal BMPs the Office of Special Events will require applicants to implement, in addition to source identification, inspection, pollutant discharge reporting, education and annual reporting requirements.

Responsible Department(s) or Division(s):

- Office of Special Events

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 provides permitting services include runs, walks, triathlons, festivals, farmer's markets, street fairs, and parades. In addition, the Park and Recreation Department, Public Utilities Department Water System Operations and Water Construction and Maintenance Divisions, Qualcomm Stadium, and other municipal facility staff issue permits for activities taking place on land managed by these departments, and are addressed in the associated Jurisdictional Runoff Management Plan (JRMP) sections. In general, a Special Event is defined as any organized activity that takes place outdoors on public streets, public sidewalks, and public right-of-ways within the City. A Special Event may also incorporate private property, when included as an extension of the Special Event venue.

Although Special Events permitted by the City occur largely on City public property, the Special Event itself is not considered a municipal facility, area, or activity that would require inclusion in the municipal inventory. Special Events are tracked in a database by the Office of Special Events in lieu of inclusion in an inventory, since events are, by nature, temporary. City properties, on which Special Events may occur, are included in the City's Municipal Properties Inventory, included as Appendix II.A. Minimum Municipal BMPs are required of Special Events in order to identify and control potential pollutant sources, as described later in this section.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.12-1.

Table 7.3.12-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.12.1	E.5.b.	Implement and maintain BMPs.
7.3.12.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.12.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.12.3	Attachment B.1.l.(6)	Report pollutant discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") or receiving waters.
7.3.12.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.12.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for Special Events are listed in Table 7.3.12-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), excepting those that have been identified as not applicable for special events, which have been omitted. If future activities are conducted during special events that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.12-2. Office of Special Events Minimum Municipal BMPs

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. SDMC §43.0306. **Office of Special Events BMP Implementation:** Illicit connections are man-made physical connections to the storm drain system that convey discharges that are not composed entirely of storm water. Illicit discharges include grey water (i.e., laundry rinse water); waste water; or irrigation water, including recycled or reclaimed water, that are effectively prohibited from being discharged to the storm drain system under the Municipal Permit. Any suspected unpermitted physical connections to the City's storm drain system shall be reported to the City's Storm Water Division Hotline at 619-235-1000. Illicit connections to the storm drain system shall be removed immediately.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **Office of Special Events BMP Implementation:** To eliminate illicit discharges, do not allow any solid or liquid material except uncontaminated storm water to enter City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. Connections that convey illicit discharges to the City's storm drain system are illicit connections and shall be eliminated. Additional guidance about how to manage common types of discharges is provided in Minimum Municipal BMPs 3 through 11 below. Report any suspected illicit discharges to the Storm Water Division Hotline at 619-235-1000.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**<u>Minimum Municipal BMP:</u>** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & §43.0307(a). **<u>Office of Special Events BMP Implementation:</u>** Process water, from processes such as, stone/tile cutting, cement mixing, industrial rinsing, or water used to detect tire leaks, and wash water from activities such as mopping, hosing, pressure washing, or any other commercial or industrial applications, contains pollutants and shall not be disposed of to City storm drains, curbs and gutters, or any other part of the City's storm drain system. All process and wash water shall be contained, captured, and disposed of appropriately. Use permanent or temporary containment/collection measures to direct or pump process or wash water to the sanitary sewer, collection container, or onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. If wastewater contains powders or solids (e.g., stone- or tile-cutting water, concrete slurry), pretreatment may be necessary to settle out solids before water may be reused or pumped to the sanitary sewer. Contact the Public Utilities Department (PUD) at 858-654-4100 for approval to discharge to the sanitary sewer system, as an industrial pretreatment permit may be required.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**<u>Minimum Municipal BMP:</u>** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a).

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
		<u>Office of Special Events BMP Implementation:</u> This BMP is applicable to all industrial and commercial properties and activities, regardless of whether the activity is conducted by the property owner, lessee, contractor, or other persons. Water associated with washing activities shall not be allowed to enter City storm drains, curbs and gutters, or any other part of the City's storm drain system. Wash areas shall not include any drains that connect to the storm drain system. Sanitary sewer drains within wash areas are allowable if appropriate permits have been obtained from the PUD at 858-654-4100 for details. Drains connected to dead sumps are allowable if proof of appropriate wastewater disposal can be provided promptly upon City request. Construction of any new drains or rerouting of existing drainage systems will generally require a permit from the Development Services Department at 619-446-5000 for details. When washing is conducted outside permanent designated wash areas, all wash water shall be contained, captured, and disposed of appropriately. Designated washing areas may consist of a container, a berm, or a liner to collect and contain liquids and prevent runoff. Use of a control nozzle or similar mechanism is required to maximize control over the quantity of water used. Discharge to the City's storm drain system is strictly prohibited. Contained water shall be collected and captured using a wet vacuum or equivalent. Allowing residual water to evaporate is an acceptable method of disposal only if all standing water has been removed and properly disposed of to avoid tracking offsite. Any remaining residue on pavement or other impervious areas shall be removed to prevent future pollutant discharges. Captured wash water may be disposed through the sanitary sewer system with PUD's approval. Contact PUD at 858-654-4100 for approval of any discharges to the sanitary sewer system; businesses are responsible for obtaining necessary permits.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
		Dispose of wash water containing oil, paint, or other hazardous waste in accordance with applicable regulations. If only biodegradable soaps and uncontaminated water are used, wash water may be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. This can be accomplished by washing the vehicle on a landscaped area or using a berm to direct wash water to a landscaped area.
8	Properly dispose of discharges from swimming pools, spas, fountains, reflective pools, ponds, and filter backwash.	**<u>Minimum Municipal BMP:</u>** Swimming pools, spas, fountains, reflective pools, ponds, and filter backwash water shall be properly disposed of to prevent pollutants from entering the storm drain system. SDMC §43.0304 & §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **<u>Office of Special Events BMP Implementation:</u>** Discharge of water from swimming pools, spas, fountains, and other recreational or demonstrational water features (such as dunk tanks, water games, and product demonstration tanks) either by (1) discharging water to the sanitary sewer system; or (2) slowly draining water to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Discharge to the storm drain system is only permissible if the surface flow path is cleared of trash, debris and sediment, the water is dechlorinated, has a pH in the 7-8 range, is within the ambient temperature, has no algae, algaecide or suspended solids, and is not saline. Dispose of filter backwash water only to the sanitary sewer

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
		system, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Discharge of saline swimming pool water to City storm drains, curb gutters, or any other part of the City's storm drain system is prohibited unless the saline water can be discharged through a pipe or concrete channel directly to a naturally saline water body (e.g., the Pacific Ocean). Prior to discharging large quantities of water to the sanitary sewer system, contact the PUD at 858-654-4100 to determine whether the discharge is allowed and applicable permitting requirements.
9	Control air conditioning condensation discharges.	**Minimum Municipal BMP:** Air conditioning condensation discharges shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **Office of Special Events BMP Implementation:** This Minimum Municipal BMP applies to portable facilities, such as trailers, food trucks, portable restrooms, or medical units, which utilize air conditioning or chiller units that may be present at Special Events. Condensate from such units that would otherwise enter the storm drain system shall be prevented from discharging to the storm drain system through collection or redirection for disposal to landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property, or be disposed of to the sanitary sewer.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
11	Eliminate floor mat cleaning discharges.	**<u>Minimum Municipal BMP:</u>** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **<u>Office of Special Events BMP Implementation:</u>** Utilize dry cleaning methods where possible. If dry cleaning techniques including shaking out mats outdoors are used, the areas in which mats are shaken shall be cleaned by vacuuming or sweeping to prevent material shaken off mats from eventually being transported to the storm drain system. Mats may also be cleaned by vacuuming them directly, which does not release pollutants. If mats must be cleaned using water, outdoor washing should be conducted such that wash water is fully captured and disposed of to the sanitary sewer system. Alternatively, mats may be washed with potable water and biodegradable detergent such that the water drains to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
Good Housekeeping		
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>Office of Special Events BMP Implementation:</u>** Paved event areas, including parking lots, roads, sidewalks, and driveways shall be swept as needed throughout the event, and at the conclusion of the event, to return the event area to equal or better condition as before the event began. The entire impervious area of the parking lots, roads, sidewalks, and driveways must be cleaned at the end of each Special Event. Spot cleaning throughout the event shall occur as needed. Cleaning using wet methods such as power washing may be substituted for sweeping provided that all wash water is contained, captured, and disposed of properly. See Minimum Municipal BMP 3 for additional details on disposal of wash water. Where pollutants related to the special event extend outside of the designated event area, such as through aerial deposition, the entire affected area shall be cleaned at the conclusion of the event.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
17	Implement good housekeeping to keep site free of trash and debris.	**<u>Minimum Municipal BMP:</u>** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **<u>Office of Special Events BMP Implementation:</u>** Conduct cleaning prior to, during, and after the event as needed to ensure trash, sediment, litter, and other debris does not accumulate. Monitor activities with the potential for aerial pollutant transport, and adjust material use and cleanup activities as necessary to reduce pollutant transport. Ensure that trash is picked up around the trash and recycling containers and dumpsters at all times. Provide enough trash and recycling containers and dumpsters in all appropriate areas to meet disposal needs.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
Material Storage and Handling		

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**<u>Minimum Municipal BMP:</u>** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **<u>Office of Special Events BMP Implementation:</u>** Secondary containment shall be used for liquid storage in outdoor areas. This includes liquid food, cooking oil, beverage items, and cleaning products. Secondary containment consists of a container or leak-proof structure outside of the primary container, designed to prevent accidental releases of materials from the storage area. To maintain the effectiveness of secondary containment, regularly remove and appropriately dispose of spills, precipitation, or other liquids that accumulate in the secondary containment. Provide liquid storage containers with covers to prevent precipitation from accumulating in or causing overflows from the secondary containment. A variety of methods are available, including but not limited to: containers, curbs, and vendor products. To maintain the effectiveness of secondary containment, regularly remove and appropriately dispose of spills, precipitation, or other liquids that accumulate in the secondary containment. Provide liquid storage containers with covers to prevent precipitation from accumulating in or causing overflows from the secondary containment. If evidence of spills due to inadequate containment is observed, the City enforcement official may specify a minimum required containment capacity. Other applicable regulations may apply to the use of secondary containment, especially for hazardous materials, which are regulated by the County of San Diego Department of Environmental Health at 858-505-6880. See Minimum Municipal BMPs 19 and 20 for additional information.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
19	Properly store and dispose of hazardous substances.	**<u>Minimum Municipal BMP:</u>** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows if leaks or spills occur. SDMC §43.0307(a). **<u>Office of Special Events BMP Implementation:</u>** Proper storage and disposal of all hazardous materials and wastes is required. Hazardous materials and wastes generated by business and Special Event activities are additionally regulated by the County of San Diego Department of Environmental Health. Disposal of hazardous wastes using an authorized hazardous waste collection service is required. Store hazardous materials and wastes, and their primary storage containers, with sufficient cover and/or containment to prevent contact with storm water. See Minimum Municipal BMP 20 for additional details regarding storage.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**<u>Minimum Municipal BMP:</u>** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **<u>Office of Special Events BMP Implementation:</u>** When runoff from precipitation, irrigation, or water from other sources moves along the ground it can pick up pollutants and convey them to the storm drain system. Covering, containing, and/or elevating materials off of the ground prevents pollutants from contaminating storm water by preventing run-on from directly contacting materials, and by preventing materials from being transported by water or wind. This is especially pertinent when rain is forecast to occur during the event. Some examples of cover include roofs, awnings, and tarps. Where coverage is not feasible or is cost prohibitive, alternative approaches such as installing berms around the stored materials, or directing runoff to pervious areas may be allowed. Outdoor materials that are not a potential source of pollutants do not require coverage. Note that installing structural coverage will usually require obtaining permits from the City prior to installation. To determine applicable regulations and whether a permit would be required, contact the Development Services Department at 619-446-5000.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **Office of Special Events BMP Implementation:** Hazardous materials and wastes generated by business activities are regulated locally by the County of San Diego Department of Environmental Health. Hazardous materials shall be labeled and such label shall include additional information as required by other agencies.
Planning		
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **Office of Special Events BMP Implementation:** The Minimum Municipal BMPs detailed in this table may serve as the suggested BMP plan for Special Events. Applicants shall identify/describe BMPs to be used at the event on the event application. If the suggested Minimum Municipal BMPs are not selected, the Applicant must propose equivalent BMPs, satisfactory to the Office of Special Events.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**<u>Minimum Municipal BMP:</u>** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **<u>Office of Special Events BMP Implementation:</u>** Maintain vehicles and equipment to prevent leaks and spills. This can be achieved by maintenance to prevent leaks from operative vehicles. Prevent storm water, ground water, and soil contamination by capturing leaks and spills before they contact the ground. Drip pans or sealable containers are also a simple way to prevent time-intensive clean up, expensive disposal of hazardous wastes, and the need to continually replace spill kit absorbent materials. Used automotive fluids, such as oil or antifreeze, are considered hazardous wastes and shall be disposed of according to current regulations. Contact the County of San Diego Department of Environmental Health at http:/www.sdcounty.ca.gov/deh.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **Office of Special Events BMP Implementation:** The type of spill kit necessary will depend on the materials that could potentially spill at the site or mobile activity. Special attention should be paid to liquids, hazardous materials and waste storage and handling. Adequate materials shall be kept on location to respond to the largest potential spill. Examples of spill kit materials include granular absorbents, absorbent pads, absorbent rolls, or rags. If a site or activity poses the risk of large or hazardous spills, emergency phone numbers shall be posted in a visible place with the spill kit and also included in the spill cleanup procedure discussion in the BMP Plan. For information regarding proper handling and cleanup of business-related hazardous materials contact the County of San Diego's Department of Environmental Health. http://www.sdcounty.ca.gov/deh.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
28	Immediately clean up spills.	**<u>Minimum Municipal BMP:</u>** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **<u>Office of Special Events BMP Implementation:</u>** Spills shall be cleaned using dry methods primarily. Examples of dry cleanup methods include applying dry absorbent and removing and disposing of the absorbent properly, and absorbing spilled materials with rags. Materials used to clean up hazardous wastes shall be disposed of in accordance with applicable regulations. If spills cannot be cleaned effectively using dry methods only, wet methods such as pressure washing or mopping may be used provided all wash water is contained, captured, and disposed of appropriately. Any discharge of water from a spill clean up to the City's storm drain system is illegal and prohibited. Allowing water to evaporate is an acceptable method of disposal only if all standing water has been removed and properly disposed of to avoid tracking off site. Any remaining residue on pavement or other impervious areas shall be removed to prevent future pollutant discharges. Captured wash water shall be collected and captured using a wet vacuum or equivalent. Captured wash water may be directed to the sanitary sewer system with the approval of PUD. Contact PUD at (858) 654-4100 for approval of any discharges to the sanitary sewer system. Wash water containing oil, paint, or other hazardous waste must be disposed of properly in accordance with applicable regulations. If only biodegradable soaps and uncontaminated water are used, wash water may be directed to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**<u>Minimum Municipal BMP:</u>** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **<u>Office of Special Events BMP Implementation:</u>** Temporary measures must be taken to protect storm water conveyances from spills, debris, or contaminated runoff during Special Events. Examples of activity-related materials that might accidentally enter storm water conveyances include fluid leaks or spills, litter, or other debris. Applicants must protect all storm drains identified on their site plans. Fabric or other effective materials shall be placed over storm drain inlets for the duration of the event, to prevent debris, and non-storm water discharges from entering. Drain covers shall be reinforced as necessary, such as with chicken wire, to prevent Special Event patrons from stepping through the drain cover and into the inlet. Tape may be used to secure protective materials without creating a trip hazard. No sand bags, gravel bags, or other items are to be used to secure protective materials where they may create a trip hazard. Drains are not to be covered when measurable rain is forecast at a 40% chance or greater as of 24 hours prior to the start of the event setup. The Applicant will be responsible for contacting the Storm Water Planner prior to the event to determine final BMP requirements in the event that rain is forecast. If material enters the storm drain inlet, the Applicant will be responsible for ensuring the material is immediately removed, by completing or arranging for proper cleanup by a qualified party. Note that bodily entry into storm drains is considered "confined space entry," and is not recommended without adherence to applicable regulations. See the Occupational Safety and Health Administration (OSHA) website for more

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
		information about confined space entry. http://www.osha.gov. If materials have entered the storm drain system that cannot be fully recovered, the Applicant will be responsible for reporting the discharge to the Storm Water Division Hotline at 619-235-1000.
Training and Education		
30	Provide pollution prevention signage for storm drains.	**Minimum Municipal BMP:** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **Office of Special Events BMP Implementation:** Provide temporary signage in visible areas, particularly near inlets, throughout the event venue with language to serve as a reminder not to discharge anything to the storm drain system.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**<u>Minimum Municipal BMP:</u>** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **<u>Office of Special Events BMP Implementation:</u>** Applicants are encouraged to train event staff, vendors, service providers, volunteers, 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. Service Provider and Vendor contracts should also include such responsibilities. Training shall include instruction on the implementation of all of these Minimum Municipal BMPs to the extent that they are applicable to the Special Event. For storm water educational resources, see the City's Storm Water Division website: http://www.sandiego.gov/thinkblue.
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**<u>Minimum Municipal BMP:</u>** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **<u>Office of Special Events BMP Implementation:</u>** Waste disposal areas shall be monitored throughout the Special Event and maintained as needed to prevent the accumulation of trash, debris, liquids, and other pollutants. Waste receptacles that are full shall be emptied to prevent waste overflow. At the conclusion of the Special Event, all temporary waste receptacles shall be removed, and the area cleaned of

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
		any residual waste. Dry cleaning methods such as sweeping are preferred to keep temporary trash areas clean. If wet cleaning methods are used to clean up liquid spills, all wash water shall be contained, captured, and disposed of appropriately using one or more of the following methods: • Collect and capture using a wet vacuum, mop, absorbent material or equivalent. • Allowing residual water to evaporate is an acceptable method of disposal only if all standing water has been removed and properly disposed of to avoid tracking offsite. Any remaining residue on pavement or other impervious areas shall be removed to prevent future pollutant discharges. • Direct to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. • Dispose of wash water that does not contain hazardous waste to the sanitary sewer system if allowed by the PUD: call 858-654-4100 for details. • Wash water containing hazardous wastes requires disposal by an appropriate contractor. Additional information about hazardous material disposal can be obtained from the County of San Diego Department of Environmental Health. More information regarding what types of items may be placed in trash receptacles can be obtained from your waste disposal company. The City Environmental Services Department also reviews Special Event Permit Applications to determine if appropriate trash and recycling disposal considerations have been made.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
35	Manage animal waste and animal washing in a manner that prevents transport of wastes and wash water off-site.	**Minimum Municipal BMP:** Animals and animal waste shall be managed and stored in a manner that prevents animal supplies, waste, and wash water from entering the storm drain system. Collect and dispose of animal waste through trash receptacles or the sanitary sewer, as appropriate. SDMC §43.0307(a). **Office of Special Events BMP Implementation:** Animal waste can be a source of bacteria, viruses, and other pollutants. Animal waste shall be collected promptly and properly disposed of to avoid the spread of disease and the contamination of runoff. Any water used to clean animals or animal housing (including trailers) shall be disposed of to the sanitary sewer or allowed to infiltrate into landscaping without runoff. If animal wash areas exist on site, they shall be designed to prevent discharges to the storm drain system. Animal wash areas shall not be established near storm drains.
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **Office of Special Events BMP Implementation:** Waste receptacles shall be kept outfitted with lids, covers, overhead protection, or be able to fully contain any rainwater that may contact waste materials in the event that rain is forecast. Storage areas shall be located away from storm drains and storm water flows. Also see Minimum Municipal BMP 37 for additional requirements for waste cooking oil storage.

BMP ID[1]	BMP Title	Office of Special Events Minimum Municipal BMPs
37	Cooking oil waste shall be managed to prevent illicit discharges.	**Minimum Municipal BMP:** Waste cooking oil shall be managed in a manner that prevents discharges. SDMC §43.0307(a). **Office of Special Events BMP Implementation:** Waste containers for oils, grease, fats, or tallow shall be kept within a covered and/or contained area to prevent residual waste transport in runoff. The chosen storage option (cover, containment, or both) shall be sufficient to prevent the discharge of any storm water that has contacted any residual waste oil on the bin or surrounding areas. This means that overhead cover is sufficient to prevent any storm water contact with the bin and any residue in the surrounding area, the containment is of a high enough capacity to retain all storm water that has contacted the bin and any residue in the surrounding area, or both in conjunction will prevent any discharge of residual waste oil, even during heavy rains and/or windy conditions. Areas surrounding the waste container that are not covered or contained shall be kept free of residual pollutants. Cooking oil waste shall be disposed of appropriately at the end of every Special Event, and shall not be abandoned, or disposed of in the curb, gutter, or any other part of the storm drain system. Service Provider and Vendor contracts should also include such responsibilities.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water Division of the Transportation & Storm Water Department is responsible for developing and providing all new employee trainings. All new Office of Special Events Department staff will receive a basic introduction to storm water issues via a "Storm Water and You" training module presented at the "New Employee Orientation."

Office of Special Events-Specific Training

The Office of Special Events will create, execute, and fund training that covers the implementation of the Minimum Municipal BMPs in Table 7.3.12-2, as described in Table

7.3.12-3, below. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.12-3. Office of Special Events-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Training Video	City wide Special Events Management team	Ongoing

Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Office of Special Events in consultation with the Storm Water Division (e.g., including the "Think Blue" logo on materials). Table 7.3.12-4 lists the activities, specific targeted communities, and the anticipated schedule.

Table 7.3.12-4. Department External Outreach Activities by Target Audience

Activity	Target Audience(s)*	Schedule
Customer Video – "Storm Water Protection at Special Events." Delivered to customer by: o City's Website o Online event application featuring potentially applicable Minimum Municipal BMPs o Applicant workshop(s) o Pre and Post meetings for large Special Events	3,4	Ongoing

* Denoted as follows:

17. Industrial Owners and Operators
18. Construction Site Owners and Developers
19. Commercial Owners and Operators
20. Residential Community, General Public, and School Children

7.3.12.2 Inspection Procedures

The Storm Water Division, Policy and Enforcement Section, will conduct periodic inspections of Special Events (no less than once annually) to ensure that the Special Event Permit Requirements identified in Table 7.3.12-2 above, or the equivalent BMP Plan set forth by the Applicant are effectively being implemented. If potential discharges to the storm drain system are identified during inspection, City staff will provide education, report the potential discharge to the City's Storm Water Division Hotline at 619-235-1000, and provide escalated enforcement action, as needed.

7.3.12.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to §43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the Storm Water Division will require that corrections be performed generally immediately, but at minimum prior to the next predicted rain event. Due to the temporary and brief nature of special events, correction and enforcement timeframes are generally shorter than for fixed facilities. In the event that corrections cannot be completed within the established timeframe, the Storm Water Division will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, if applicable, the Storm Water Division will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible party(ies) does not perform the necessary corrective actions in response to the direction of the Storm Water Division Staff member, escalated enforcement action will be taken in accordance with the industrial and commercial, or mobile enforcement response procedures, as applicable. See Section 6.0 for additional details, and the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 “Conditionally Allowed Non-Storm Water Discharges” to review the list of conditionally allowed non-storm water discharges. 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 requiring reporting through the 24 hour reporting process.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.12.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the JRMP annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.13 Storm Drain Conveyance System Operations and Maintenance

The City of San Diego (City) Storm Water Division of the Transportation & Storm Water (T&SW) Department is responsible for the operation and maintenance of the municipal separate storm sewer system (MS4; hereafter, "storm drain system"), as well as street sweeping, and leads efforts to protect and improve the water quality of rivers, creeks, bays, and the ocean. The goal of this program is to reduce the impact of storm drain system operations and maintenance, and street sweeping activities on storm water quality in the San Diego region. This section contains Minimum Municipal best management practices (BMPs) the Storm Water Division will implement, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

Responsible Department(s) or Division(s):

- Storm Water Division of the Transportation & Storm Water Department

The Storm Water Division is responsible for the maintenance of storm drain assets located within public streets, on City-owned parcels, and on drainage easements dedicated to the City, except for those owned by the Public Utilities Department. Storm drain assets are defined as components of the storm drain system (box culverts, brow ditches, channels not used for compensatory wetlands, and storm drains) as well as associated drainage structures (cleanouts, inlets, energy dissipaters, headways, low flow diversions, outlets, spillways, tide gates, pump stations, and treatment control or structural BMPs) which are designed to provide drainage and/or water quality treatment.

Storm drain asset maintenance includes all activities required to ensure appropriate operation of the conveyance or structure. Treatment control or structural BMP maintenance includes trash and debris removal from BMPs designed to collect trash and debris, and the maintenance of natural soil and other filtration media in the substrate associated with the BMP, where the substrate is part of the functional design of the BMP. The Storm Water Division is additionally responsible for the required street sweeping of all pavement located within the public right-of-way or City owned property managed by the T&SW Department or the Park & Recreation Department.

The Storm Water Division inventory includes the buildings that the division occupies, as well as portions of one operations yard. Additionally, the Storm Water Division uses GIS to identify the locations of major storm drain system components for the City of San Diego (see Appendix III, "MS4 Map").

The Storm Water Division's portion of the Chollas Operations Yard is included in the Municipal Facilities Inventory; see Appendix II.A. With respect to Storm Water Division operations discussed in this section, "facility" refers only to the Storm Water Division's

portion of the Chollas Operations Yard. Appendix II.B includes an inventory of the storm drain system and related structures that the Storm Water Division maintains, including flood management structures, and the roads, streets, highways, and parking lots that the Storm Water Division sweeps.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.13-1.

Table 7.3.13-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A and Appendix II.B	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.13.1	E.5.b.	Implement and maintain BMPs.
7.3.13.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.13.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.13.3	Attachment B.1.l.(6)	Report pollutant discharges to the storm drain system or receiving waters.
7.3.13.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.13.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for Storm Water Division facilities and activities are listed in Table 7.3.13-2, below. The Minimum Municipal BMPs detailed Table 7.3.13-2 serve as the BMP plan for the Storm Water Division's operations. Additional detail regarding specific activities is provided in Division training documents. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the Storm Water Division engages in. If future activities are begun by the Storm Water Division that are not covered by the Minimum Municipal BMPs below, the applicable Minimum Municipal BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.13-2. Storm Water Division Minimum Municipal BMPs

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **Storm Water Division BMP Implementation:** No illicit connections are known to exist in Storm Water Division maintained storm drains. Any suspected illicit connections discovered by Storm Water Division Operations and Maintenance staff will be reported to the Storm Water Division Hotline at 619-235-1000 for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **Storm Water Division BMP Implementation:** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 12, below.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**Minimum Municipal BMP:** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & §43.0307(a). **Storm Water Division BMP Implementation:** Water used in storm drain system jetting is recollected by vactor truck, and waste water from any other maintenance activity, such as saw cutting, is recollected using a portable vacuum. Wash water is never discharged to the storm drain system. Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**Minimum Municipal BMP:** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **Storm Water Division BMP Implementation:** Municipal vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
11	Eliminate floor mat cleaning discharges.	**Minimum Municipal BMP:** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **Storm Water Division BMP Implementation:** Floor mats are cleaned offsite by an outside contractor.
12	Minimize rising groundwater, diverted stream flows, uncontaminated groundwater infiltration, springs, riparian habitat/wetland flows, potable water sources, and foundation/footing drain discharges.	**Minimum Municipal BMP:** Discharges from rising groundwater, diverted stream flows, riparian habitat and wetlands, uncontaminated groundwater infiltration to the storm drain system, springs, and potable water sources are exempt unless they are identified as a source of pollutants to receiving waters by the City or the RWQCB. SDMC §43.0304 & §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305(b) and (d). **Storm Water Division BMP Implementation:** All flows identified as a source of pollutants to receiving waters by the City or the RWQCB from rising groundwater, diverted stream flows, riparian habitat and wetlands, uncontaminated groundwater infiltration to the storm drain system, springs, and potable water sources shall be disposed of to the sanitary sewer system, landscaping, or to the storm drain system after obtaining an individual NPDES permit from the RWQCB.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
13	Regularly clean and maintain structural BMPs and Low Impact Development (LID) installations, to ensure proper performance.	**<u>Minimum Municipal BMP:</u>** BMPs installed, including LID and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **<u>Storm Water Division BMP Implementation:</u>** The Storm Water Division is responsible for the maintenance of all structural BMPs located within the public right-of-way, drainage easements, or City owned property managed by the Transportation & Storm Water Department or the Park & Recreation Department. The Storm Water Division does not maintain the vegetation of structural BMPs such as vegetated swales or bioretention areas, for which any necessary mowing, trimming, or other regular maintenance is conducted during regular landscaping activities, when these BMPs are located on facilities that are the responsibility of the Park and Recreation Department. The Storm Water Division does maintain the substrate and other operational components of such BMPs. Treatment control or structural BMPs, are inspected, and cleaned as necessary, during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**<u>Minimum Municipal BMP:</u>** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **<u>Storm Water Division BMP Implementation:</u>** All unpaved areas of the Storm Water Division's portion of the Chollas Operations Yard with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

<table>
<tr><th>BMP ID[1]</th><th>BMP Title</th><th>Storm Water Division Minimum Municipal BMPs</th></tr>
<tr><td colspan="3">Good Housekeeping</td></tr>
<tr><td>15</td><td>Regularly clean parking lots.

(Includes sweeping of improved streets, curb and gutters)</td><td>
<u>Minimum Municipal BMP:</u>

Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a).

<u>Storm Water Division BMP Implementation:</u>

The Storm Water Division sweeps all paved municipal parking areas, and roads, streets, and highways in the public right-of-way, and at City operations yards. Street sweeping services may also be provided for paved parking areas associated with other City departments, on request. Paved parking lots, roads, and driveways that are the responsibility of the Storm Water Division are swept depending on the threat level, utilizing the following schedule as a baseline:
<table>
<tr><th>Debris Volume</th><th>Frequency</th></tr>
<tr><td>1. High</td><td>Up to twice/month</td></tr>
<tr><td>2. Medium</td><td>Monthly</td></tr>
<tr><td>3. Low</td><td>Once/year</td></tr>
</table>
In accordance with strategies listed in the Water Quality Improvement Plans, some areas may be swept less frequently in exchange for more frequent sweeping of targeted areas. Additional discussions of the Water Quality Improvement strategies related to this Minimum Municipal BMP are provided in Section 7.3.16.

The entire impervious surface of parking lots is swept during each sweeping event. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property.
</td></tr>
</table>

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**<u>Minimum Municipal BMP:</u>** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **<u>Storm Water Division BMP Implementation:</u>** The Storm Water Division is responsible for the inspection and maintenance of building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on the Storm Water Division's portion of the Chollas Operations Yard. These structures are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed. All storm drain system structures (catch basins, storm drain inlets, open channels, etc.) located in the public rights of way and on City owned parcels managed by the Storm Water Division and Park and Recreation Department are inspected and cleaned of debris or other foreign material generally annually. In accordance with the strategies listed in the Water Quality Improvement Plan, some inlets may be inspected and cleaned less frequently in exchange for more frequent inspection and cleaning of targeted areas. Additional discussions of the Water Quality Improvement strategies related to this BMP are provided in Section 7.3.16. When practical, work is to be done when conditions are dry. Storm drains are generally cleaned using dry methods, primarily removal using a vactor truck or by hand crews and waste materials disposed of to the landfill. If necessary, smaller storm drain pipes are cleaned utilizing a water jetting procedure. In this case, all water is collected via vactor truck at the nearest downstream access point. Work areas surrounding the storm drain structure are cleaned of any residual pollutants following cleaning activities. Note that any storm drain structure that is designed to be self-

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
		cleaning is typically cleaned of any accumulated debris observed during an inspection immediately. There are rare cases where different equipment must be mobilized to perform the cleaning or an emergency exists and the cleaning may be delayed up to 30 days. Anthropogenic litter observed in open channels must be cleaned in a timely manner after obtaining all appropriate environmental clearances.
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **Storm Water Division BMP Implementation:** Trash and debris are picked up around Storm Water Division buildings, parking lots, and landscaped areas, including trash and recycling containers and dumpsters, as needed to keep them free of accumulated debris. This is completed on up to a daily frequency for high use areas. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and placed in dumpsters for disposal. Good housekeeping practices are implemented for onsite activities, which include cleaning any outdoor work areas throughout, and immediately following the activity. See Minimum Municipal BMP 24 for additional details regarding outdoor work areas.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **Storm Water Division BMP Implementation:** Liquids are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak.
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **Storm Water Division BMP Implementation:** Hazardous materials are stored within buildings where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **Storm Water Division BMP Implementation:** Materials that are a potential source of pollutants should not be stored outdoors. In the event that a special circumstance, such as construction activities, requires outdoor storage, materials will be stored in a manner that prevents contact with stormwater including placing materials out of the path of runoff, or diverting runoff around storage areas, and providing appropriate cover if rain is forecast. Materials will be checked on a regular basis to verify the structural BMPs (such as roofs, awnings, tarps, etc.) are in good condition.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **Storm Water Division BMP Implementation:** Hazardous materials are be labeled with the material and include additional information as required by other agencies.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
		Planning
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**<u>Minimum Municipal BMP:</u>** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **<u>Storm Water Division BMP Implementation:</u>** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for the Storm Water Division's operations. Additional detail regarding specific activities is provided in Division Standard Operating Procedure documents, and the training program is detailed under "Storm Water Division Specific Training" later in this Section. With respect to Storm Water Division operations discussed in this section, "facility" refers only to the Storm Water Division's portion of the Chollas Operations Yard.
		Outdoor Work Areas
24	Implement controls to minimize pollution from exposed outdoor work areas.	**<u>Minimum Municipal BMP:</u>** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
		areas. SDMC §43.0307(a). **<u>Storm Water Division BMP Implementation:</u>** Most of the day to day activities performed by the Storm Water Division, Operations and Maintenance consist of removing pollutants from the storm drain system. Whenever an activity does not include pollutant removal from the storm drain system (i.e. Pipe repair, repairing damaged drainage structures, etc.) the following precautions are taken, as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats, gravel bags, or sandbags, directing anticipated flows into onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. If painting near or over a watercourse, netting or tarps are used to prevent pollutant discharge. Routine outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**Minimum Municipal BMP:** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **Storm Water Division BMP Implementation:** Municipal vehicles and equipment are monitored daily for leaks, and taken to the fleet services vehicle maintenance facility or a City approved equipment repair vendor immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste. See Section 7.3.15 for additional details regarding vehicle maintenance.
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **Storm Water Division BMP Implementation:** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located on vactor trucks, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill until all material can be removed. Emergency phone numbers are posted in a visible place with the spill kit.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
28	Immediately clean up spills.	**<u>Minimum Municipal BMP:</u>** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **<u>Storm Water Division BMP Implementation:</u>** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept, shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area until the spill response staff, is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
		hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**Minimum Municipal BMP:** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **Storm Water Division BMP Implementation:** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats, gravel bags, and/or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
Training and Education		
30	Provide pollution prevention signage for storm drains.	**<u>Minimum Municipal BMP:</u>** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **<u>Storm Water Division BMP Implementation:</u>** All municipal storm drain inlets located on City owned parcels managed by the Storm Water Division are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue". Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**<u>Minimum Municipal BMP:</u>** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **<u>Storm Water Division BMP Implementation:</u>** The system used by the Storm Water Division may include signs posted in work areas or in break areas, tailgate trainings, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**Minimum Municipal BMP:** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **Storm Water Division BMP Implementation:** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the Storm Water Division annually, to include training on the implementation of all components of the BMP Plan.
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **Storm Water Division BMP Implementation:** Trash and debris are picked up around the municipal building, parking, and landscaped areas, including trash cans and dumpsters, used and maintained by the Storm Water Division weekly to keep them free of accumulated debris. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.

BMP ID[1]	BMP Title	Storm Water Division Minimum Municipal BMPs
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **Storm Water Division BMP Implementation:** Wastes generated from storm drain system cleaning activities are placed into roll-off dumpsters, or contained within the vactor truck, prior to being hauled to a collection site, where they are placed in a plastic lined pit surrounded by wattles and sandbags to prevent the flow of storm water into the storage area. Roll-off dumpsters are outfitted with covers to prevent contact with storm water in the event of rain. The wastes are removed and hauled to the landfill weekly, or as needed depending on volume. Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water 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" training.

Storm Water Division-Specific Training

The Storm Water Division will create, execute, and fund training sessions, which are performed by each section and detailed in Table 7.3.13-3, that cover the implementation of the Minimum Municipal BMPs in Table 7.3.13-2. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.13-3. Storm Water Division-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Vehicle and Equip cleaning and fueling	All Storm Water Division Supervisors and Field Employees	Ongoing
Material Delivery and Storage	All Storm Water Supervisors and Field Employees	Ongoing
Spill Prevention and Control	All Storm Water Division Supervisors and Field Employees	Ongoing
Storm Drain Inlet Protection	All Storm Water Division Supervisors and Field Employees	Ongoing
Gravel Bag Berm and Sandbag Barrier	All Storm Water Division Supervisors and Field Employees	Ongoing
Street Sweeping and Vacuuming	All Storm Water Division Supervisors and Field Employees	Ongoing
Silt Fence and Fiber Rolls	All Storm Water Division Supervisors and Field Employees	Ongoing

Department Education and Outreach to the Public

This section identifies the various public education and outreach activities to be performed by the Storm Water Division (e.g., including the "Think Blue" logo on materials). Table 7.3.13-4 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 7.3.13-4. Department External Outreach Activities by Target Audience

Activity	Target Audience(s)*	Schedule
Door hangers with storm water educational message	3,4	Ongoing

* Denoted as follows:

21. Industrial Owners and Operators
22. Construction Site Owners and Developers
23. Commercial Owners and Operators
24. Residential Community, General Public, and School Children

7.3.13.2 Inspection Procedures

The Storm Water Division inspects its portion of the Chollas Operations Yard twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing

Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. Section 7.3.13.3 provides additional discussion of potential pollutant discharges, below. As shown in Table 7.3.13-5, 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 7.3.13-5. Municipal Facility Inspection Requirements[1]

Inspection	Timeframe
First	September
Second	January - April

[1] The Storm Water Division's portion of the Chollas Operations Yard is the only Storm Water Division facility subject to these inspection frequency requirements. Inspection and cleaning frequencies applicable to storm drain system infrastructure and roads, streets, and parking lots are discussed in Table 7.3.13-2.

In addition to the facility inspections discussed above, the Storm Water Division is also responsible for routinely inspecting storm drain structures throughout the City generally annually, and more frequently where program enhancements are called for in the WQIP. Table 7.3.13-2 provides additional detail on storm drain system infrastructure inspection frequencies.

Treatment control BMPs, or structural BMPs, are inspected and cleaned as necessary during the dry season, between May and September, by the responsible City division and according to the specifications of the manufacturer.

7.3.13.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to §43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection of the Storm Water Division's portion of the Chollas Operations Yard it is determined that improvements to Minimum Municipal BMP implementation are required, the Storm Water Division will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the Storm Water Division will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities.

Following the completion of corrective actions, the Storm Water Division will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In

the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 "Conditionally Allowed Non-Storm Water Discharges" to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.13.4 Replacement of Hard Assets

When maintenance is not enough to ensure proper operation of the storm drain system (i.e., storm drain conveyances and structures), the Storm Water Division will take the

necessary steps to replace the necessary storm drain system component to restore its proper function. Projects will be prioritized based on need and are subject to funding availability.

7.3.13.5 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.14 Streets

This section is applicable to the City of San Diego (City) Street Division of the Transportation & Storm Water (T&SW) Department. The Street Division is responsible for the operation and maintenance of streets and sidewalks, with the exception of street sweeping, which is performed by the Storm Water Division of the T&SW Department. The goal of this program is to reduce the impact of Street Division operations and maintenance activities on storm water quality in the San Diego region. This section contains Minimum Municipal best management practices (BMPs) the Street Division will implement for streets operations and maintenance activities, in addition to inventory, inspection, pollutant discharge reporting, education, and annual reporting requirements.

The Street Division is responsible for the maintenance of transportation surface assets within the public right-of-way. Transportation surface assets are defined as engineered asphalt, concrete, and other surfaces designed primarily to accommodate public pedestrian and vehicle traffic, which typically provide drainage and/or water quality treatment secondarily.

Responsible Department(s) or Division(s):

- Street Division of the Transportation & Storm Water Department

The Street Division facilities are listed in the Municipal Facilities Inventory; see Appendix II.A.

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.14-1.

Table 7.3.14-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A; Appendix II.B	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.14.1	E.5.b.	Implement and maintain BMPs.
7.3.14.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.14.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.14.3	Attachment B.1.l.(6)	Report pollutant discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") or receiving waters.
7.3.14.4	E.8, F.3.b.(3)	Track and submit data for Annual Report

JRMP Section	Municipal Permit Section	Requirement (Summary)
		Forms, track and report estimated fiscal year budget expenditures.

7.3.14.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for Street Division facilities and activities are listed in Table 7.3.14-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the Street Division engages in. If future activities are begun by the Street Division that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.14-2. Street Division Minimum Municipal BMPs

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
Discharge Control		
2	Eliminate illicit non-storm water discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**<u>Minimum Municipal BMP:</u>** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. San Diego Municipal Code (SDMC) §43.0305 and RWQCB, San Diego Region Order No. R9-2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **<u>Street Division BMP Implementation:</u>** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 11, below.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**Minimum Municipal BMP:** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **Street Division BMP Implementation:** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via mop sink or toilet connections. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the sanitary sewer, or to landscaping as long as no water is discharged to the storm drain system or offsite. Any water from processing activities, such as saw cutting, is vacuumed and collected for proper disposal to the sanitary sewer, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. If necessary, solids are allowed to settle out prior to disposal, and solids are disposed of to a solid waste dumpster.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**Minimum Municipal BMP:** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **Street Division BMP Implementation:** Municipal vehicles are taken to a fleet maintenance facility by the driver, for washing within a contained wash bay. See Section 7.3.15 for additional details regarding fleet maintenance and washing activities.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**<u>Minimum Municipal BMP:</u>** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **<u>Street Division BMP Implementation:</u>** Where sprinkler systems are used, regular maintenance and weekly visual observation of the irrigation system is performed to prevent overspray, leaks, and other problems that could result in runoff to City storm drains, curb gutters along City streets, or any other part of the City's storm drain system. If rain is forecast, sprinklers are temporarily shut off to prevent water waste and runoff from saturated landscaped areas. Irrigation time periods and volumes are adjusted as needed to prevent oversaturation. When watering by hand, the amount of water applied is carefully controlled to prevent irrigation runoff. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed. During maintenance activities, soil and water are prevented from entering the storm drain system. After digging out a line, all soil is returned to the hole and compacted. The area is swept to remove any remaining soil. When bailing out an area after a line break, muddy water is discharged onto a pervious area.
11	Eliminate floor mat cleaning discharges.	**<u>Minimum Municipal BMP:</u>** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **<u>Street Division BMP Implementation:</u>** Floor mats are cleaned offsite by an outside contractor.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**Minimum Municipal BMP:** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **Street Division BMP Implementation:** All unpaved areas within the Street Division areas with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.
Good Housekeeping		
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **Street Division BMP Implementation:** Trash is picked up around the Street Division areas, including trash and recycling containers and dumpsters, at least monthly. Supervisors visually inspect outdoor areas weekly. Vegetative debris, such as leaf litter and clippings are removed from paved surfaces during landscaping activities and used onsite or placed in dumpsters.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**<u>Minimum Municipal BMP:</u>** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **<u>Street Division BMP Implementation:</u>** Liquids, and any solids which may be easily mobilized by storm water, are stored within buildings or other secondary containment structures where they will not drain to outdoor areas in the event of a spill or leak. Liquids stored on vehicles are placed into secondary containment structures.
19	Properly store and dispose of hazardous substances.	**<u>Minimum Municipal BMP:</u>** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **<u>Street Division BMP Implementation:</u>** Hazardous materials are stored within buildings, or within secondary containment and cover, where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **Street Division BMP Implementation:** Stockpiles are stored within concrete enclosures, away from the path of runoff. Wattles, sandbags, gravel bags, and/or other materials are placed on the open side of the enclosure, and used to protect the nearest downstream storm drain system connection to prevent material transport. Containment materials are checked on a regular basis to verify the structural BMPs are in good condition. Future regrading and construction plans include improvement to stockpile storage areas to further prevent pollutant transport.
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **Street Division BMP Implementation:** Hazardous materials are be labeled with the material and include additional information as required by other agencies.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
Pesticide and Fertilizer Management		
22	Properly manage pesticides and fertilizers.	**<u>Minimum Municipal BMP:</u>** Pesticides and fertilizers shall be applied in strict accordance with the manufacturer's label, as authorized by the U.S. Environmental Protection Agency to minimize the introduction of pollutants to the storm drain system. Chemicals shall be stored safely in covered and contained areas. Waste products shall be disposed of in accordance with the manufacturer's label and applicable hazardous waste regulations. The use of integrated pest management principles is encouraged to reduce or eliminate use of chemicals. SDMC §43.0307(a). **<u>Street Division BMP Implementation:</u>** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Apply pesticides and fertilizers carefully according to the requirements on the manufacturer's label. If outdoor pesticide or fertilizer use is necessary, carefully use only the needed amount and clean up afterwards to prevent irrigation water or other runoff from carrying chemicals to storm drains. Be sure to check the label to verify if the product can be used on exterior impervious surfaces, such as driveways and building foundations. Reference the Street Division Weed Abatement Standard Operating Procedure for details specific to herbicide application. Reduce the risk of pesticide use by using less toxic alternatives and Integrated Pest Management (IPM). For more information about IPM, see the University of California Statewide IPM Program at http://www.ipm.ucdavis.edu.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
		Planning
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **Street Division BMP Implementation:** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for the Street Division.
		Outdoor Work Areas
24	Implement controls to minimize pollution from exposed outdoor work areas.	**Minimum Municipal BMP:** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **Street Division BMP Implementation:** Where performed by an outside contractor, compliance with applicable BMPs from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources is required. See Appendix VIII, "Storm Water Contract Language." Minor pieces of equipment used in operations and

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
		maintenance are taken to City-approved vendors for repair when needed. All activities are performed indoors where feasible, such as pre-painting items, or cutting activities. Where not feasible, the following precautions are taken, as appropriate to the activity: All potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats, gravel bags, or sandbags, directing anticipated flows into onsite landscaped or pervious area(s) to infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**<u>Minimum Municipal BMP:</u>** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **<u>Street Division BMP Implementation:</u>** Municipal vehicles and equipment are monitored daily for leaks, and taken to the fleet services vehicle maintenance facility or a City approved equipment repair vendor immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste. See Section 7.3.15 for additional details regarding vehicle maintenance.
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**<u>Minimum Municipal BMP:</u>** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **<u>Street Division BMP Implementation:</u>** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located on vactor trucks, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill and contacting the Storm Water Division to assist with cleanup procedures. Emergency phone numbers are posted in a visible place with the spill kit.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
28	Immediately clean up spills.	**<u>Minimum Municipal BMP:</u>** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **<u>Street Division BMP Implementation:</u>** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept, shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area until the spill response staff, is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
		hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**<u>Minimum Municipal BMP:</u>** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **<u>Street Division BMP Implementation:</u>** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats, gravel bags, and/or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
		Training and Education
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**<u>Minimum Municipal BMP:</u>** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **<u>Street Division BMP Implementation:</u>** The system used by the Street Division may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.
32	Train appropriate employees on storm water pollution prevention.	**<u>Minimum Municipal BMP:</u>** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **<u>Street Division BMP Implementation:</u>** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the Street Division annually, to include training on the implementation of all components of the applicable Minimum Municipal BMP Plan.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **Street Division BMP Implementation:** Trash and debris are picked up around municipal building, parking, and landscaped areas, including trash cans and dumpsters, at least monthly to keep them free of accumulated debris. Supervisors visually inspect outdoor areas weekly. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.
34	Properly store and dispose of green waste.	**Minimum Municipal BMP:** Green waste shall be properly stored and disposed of such that it will not be transported to the storm drain system by storm water or non-storm water runoff. SDMC §43.0307(a). **Street Division BMP Implementation:** Green waste is generally collected and placed into dumpsters after regular landscape maintenance activities, or used onsite as mulch or a soil amendment. Landscape activities are scheduled to occur during dry weather.

BMP ID[1]	BMP Title	T&SW Street Division Minimum Municipal BMPs
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **Street Division BMP Implementation:** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows. Roll-off dumpsters are outfitted with covers for use in the event of rain.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

In addition to the Minimum Municipal BMPs described in the table above, when applying slurry seal coatings, the following slurry types will be used in order to prevent premature surface erosion:

- Residential Streets: Type I over Type II
- Major and Collector Roads: Type II over Type III with Type I over the bike lanes
- New developments or smooth streets: Stand-alone Type I

General Storm Water Training

The Storm Water 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”.

Street Division-Specific Training

The Storm Water Division will create, execute, and fund training sessions, detailed in Table 7.3.14-3, that cover the implementation of the Minimum Municipal BMPs in Table 7.3.14-2, for Street Division employees.

Table 7.3.14-3. Street Division-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Concrete finishing and curing	All Street Division Supervisors and Field Employees	Ongoing
Grinding, saw cutting, 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
Silt Fence and Fiber Rolls	All Street Division Supervisors and Field Employees	Ongoing

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 Division (e.g., including the "Think Blue" logo on materials). Table 7.3.14-4 lists the activities, specific targeted communities, and the anticipated completion dates.

Table 7.3.14-4. Department External Outreach Activities by Target Audience

Activity	Target Audience(s)*	Schedule
1. Door hangers with storm water educational message	3,4	Ongoing

* Denoted as follows:

25. Industrial Owners and Operators
26. Construction Site Owners and Developers
27. Commercial Owners and Operators
28. Residential Community, General Public, and School Children

7.3.14.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown

in Table 7.3.14-5, 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). The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility.

Table 7.3.14-5. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

7.3.14.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the Street Division will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the Street Division will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, the Street Division will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher-ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 "Conditionally Allowed Non-Storm Water Discharges" to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.14.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.15 Fleet Services

This section is applicable to the City of San Diego (City) Fleet Services Division. The goal of this section is to reduce the impact of Fleet Services Division operations and maintenance activities on storm water quality and provide guidance for the protection of water quality and receiving waters. This section contains Minimum Municipal 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 Fleet Services Division operates and maintains a number of vehicle maintenance facilities, and operations yards. The primary operations yards are: Central Operations, Miramar Place, Chollas, 20th & B, and Rose Canyon Operations Yards. Additional vehicle repair facilities are located at Police garages (8 facilities). Fleet Services Division facilities are listed in the Municipal Facilities Inventory; see Appendix II.A.

Responsible Department(s) or Division(s):

- Fleet Services Division

The City's program must meet the requirements of the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), as described in Table 7.3.15-1.

Table 7.3.15-1. Municipal Permit Requirements

JRMP Section	Municipal Permit Section	Requirement (Summary)
Appendix II.A	E.5.a.	Inventory municipal areas, activities, and potential sources of pollutants.
7.3.15.1	E.5.b.	Implement and maintain BMPs.
7.3.15.2	E.5.c.	Inspect municipal areas and activities, and implement any necessary follow up actions.
7.3.15.3; Appendix XIV	E.5.d.	Maintain legal authority to achieve compliance for municipal areas and activities.
7.3.15.3	Attachment B.1.l.(6)	Report pollutant discharges to the municipal separate storm sewer system (MS4; hereafter, "storm drain system") or receiving waters.
7.3.15.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

7.3.15.1 Methods to Implement Minimum Municipal BMPs

Minimum Municipal BMPs for Fleet Services Division facilities and activities are listed in Table 7.3.15-2, below. These Minimum Municipal BMPs correspond to those outlined in the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX), for all activities the Fleet Services Division engages in. If future activities are begun by the Fleet Services Division that are not covered by the Minimum Municipal BMPs below, the applicable BMP from the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources will be utilized to ensure proper management.

Table 7.3.15-2. Fleet Services Division Minimum Municipal BMPs

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
Discharge Control		
1	Eliminate illicit connections to the municipal separate storm sewer system (MS4; hereafter, "storm drain system").	**Minimum Municipal BMP:** Find and abate all illicit connections to the storm drain system through properly approved procedures, permits, and protocols. San Diego Municipal Code (SDMC) §43.0306. **Fleet Services Division BMP Implementation:** No illicit connections are known to exist on municipal facilities. Any suspected illicit connections discovered by municipal staff will be reported to the "Think Blue" Hotline for follow-up by Code Compliance Officers. Code Compliance Officers shall require the immediate removal of any such connection by the responsible party.
2	Eliminate illicit non-storm water discharges.	**Minimum Municipal BMP:** Non-storm water (water other than rain) shall not be discharged to the City's storm drain system. SDMC §43.0304(a). Limited exceptions may apply. SDMC §43.0305 and RWQCB, San Diego Region Order No. R9- 2013-0001, as amended by R9-2015-00001 and R9-2015-0100. **Fleet Services Division BMP Implementation:** Implementation of this Minimum Municipal BMP is detailed in BMPs 3 through 11, below.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
3	Properly dispose of process and wash water.	**Minimum Municipal BMP:** All process water and wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. SDMC §43.0304 & § 43.0307(a). **Fleet Services Division BMP Implementation:** Any wash water generated from the cleaning of building interiors is discharged to the sanitary sewer via wash racks, which are connected to a clarifier to remove oil and solids for separate disposal. Wet cleaning is not anticipated to occur in outdoor areas, however if necessary, all wash water will be contained and collected for proper disposal to the wash rack, or to onsite landscaped or pervious area(s) to infiltrate or evaporate, without resulting in erosion or runoff to the storm drain system or any adjacent property. Any water from Fleet Services Division activities, such as tire leak testing, is contained and collected for proper disposal to the sanitary sewer via the wash rack.
4	Eliminate the discharge of vehicle, boat, and equipment wash water.	**Minimum Municipal BMP:** Discharge of vehicle, boat, and equipment wash water shall be contained, captured, and reused, or properly disposed of to the sanitary sewer, an appropriate waste hauler, or to landscaping or other pervious surfaces. No drains within wash areas shall be connected to the storm drain system. SDMC §43.0304 and §43.0307(a). **Fleet Services Division BMP Implementation:** Vehicles and equipment are washed in wash racks, which are connected to the sanitary sewer via clarifier, to remove oil and solids for separate disposal. Wash racks and clarifiers are cleaned out regularly, depending on the size and level of use. Contaminated wastes are hauled to a disposal facility for incineration every 2 months.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
6	Eliminate irrigation runoff.	**Minimum Municipal BMP:** Irrigation runoff to the storm drain system shall be eliminated through proper landscape maintenance and watering practices. SDMC §43.0304 & §43.0307(a). **Fleet Services Division BMP Implementation:** Only hand watering is performed for the very limited potted plants located at Fleet Services Division facilities. Water is carefully controlled to prevent overspray or oversaturation. All drought and permanent water use restrictions may be more stringent than this Minimum Municipal BMP and must be followed.
9	Control air conditioning condensation discharges.	**Minimum Municipal BMP:** Air conditioning condensation discharges shall be prevented from reaching City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0307(a). Conditionally allowed non-storm water discharges are described in SDMC §43.0305. **Fleet Services Division BMP Implementation:** All air conditioning condensate lines on Fleet Services Division facilities are either plumbed directly to sewer, or discharge into a container which is disposed to sewer by hand.
11	Eliminate floor mat cleaning discharges.	**Minimum Municipal BMP:** Floor mats shall be cleaned in a manner such that there is no discharge to City storm drains, curbs and gutters, or any other part of the City's storm drain system. SDMC §43.0304 & §43.0307(a). **Fleet Services Division BMP Implementation:** Floor mats are cleaned offsite by an outside contractor.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
13	Regularly clean and maintain structural BMPs and LID installations, to ensure proper performance.	**Minimum Municipal BMP:** BMPs installed, including Low Impact Development (LID) and structural BMPs, must be inspected at a minimum annually, and properly operated and maintained. SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** The Fleet Services Division is responsible for the inspection and maintenance of any treatment control BMPs, or structural BMPs, on Fleet Services Division properties. These installations are inspected, and maintained where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed, and according to the specifications of the manufacturer.
Erosion and Sediment Control		
14	Protect unpaved areas, including landscaping, from erosion using vegetation or physical stabilization.	**Minimum Municipal BMP:** Exposed soils that are actively eroding, or prone to erosion due to disturbance, shall be protected from erosion. Significant accumulations of eroded soil shall be removed or contained to prevent sediment transport in runoff to the storm drain system. SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** All unpaved areas on Fleet Services Division facilities with the potential for erosion, have been stabilized utilizing vegetation, gravel, structural containment such as curbs, or other equivalent measures. In the event that any pervious areas are disturbed or otherwise become destabilized, temporary cover and containment measures will be installed, including erosion control blankets, gravel bags, fiber rolls, and silt fences. These measures will be maintained and replaced as needed to maintain their effectiveness, until the area can be more permanently stabilized. This requirement does not apply to natural, undeveloped areas, except where erosion is occurring as a direct result of onsite human activity, such as paving, land disturbance, or vegetation removal.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
		Good Housekeeping
15	Regularly clean parking lots.	**<u>Minimum Municipal BMP:</u>** Paved parking areas, roads, and driveways located on the property shall be swept at least once per year. During each cleaning, the entire area shall be cleaned. Sweeping is the preferred method. Wet cleaning methods, such as power washing, may be substituted for sweeping if all wash water is contained, captured, and disposed of appropriately. SDMC §43.0307(a). **<u>Fleet Services Division BMP Implementation:</u>** Paved parking lots, roads, and driveways are swept by the Storm Water Division of the Transportation & Storm Water Department at least once per year, and City yards are swept once per month. See Section 7.3.14 for additional details.
16	Keep storm drain inlets and under drains free of sediment, trash, and debris.	**<u>Minimum Municipal BMP:</u>** Accumulated materials shall be removed from onsite storm drains and under drains at least once per year. Storm drains and under drains shall be kept free of significant amounts of sediment, trash, and debris. SDMC §43.0307(a). **<u>Fleet Services Division BMP Implementation:</u>** The Fleet Service Division is responsible for the inspection and maintenance of any storm drain inlets or building drain assets (such as building gutters, downspouts, under drains and other appurtenances designed primarily to convey water away from a building structure, garden or sidewalk) on Fleet Service Division properties. Building drain assets are inspected, and cleaned of debris or other foreign material where necessary, at least once per year. This typically occurs during the dry season, between May and September, with additional maintenance performed throughout the year as needed. Drains on Fleet Services Division facilities are inspected and cleaned twice per year using a vactor truck.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
17	Implement good housekeeping to keep site free of trash and debris.	**Minimum Municipal BMP:** Outdoor areas shall be cleaned as needed to keep them free of accumulations of trash, sediment, litter, and other debris. SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** Trash is picked up around Fleet Services Division grounds, including trash and recycling containers and dumpsters, regularly.
Material Storage and Handling		
18	Provide and maintain secondary containment to catch spills when storing potential liquid pollutants in outdoor areas.	**Minimum Municipal BMP:** Effective secondary containment shall be provided and maintained for all containers of liquid stored in outdoor areas to prevent leaks or spills from discharging pollutants to the storm drain system. Containers shall be kept in good condition and securely closed when not in use. Secondary containment shall also be provided for all liquids during transport to prevent spills due to leaks or punctures. SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** Liquids, and any solids which may be easily mobilized by storm water, are stored within buildings or other secondary containment structures where they will not drain to outdoor areas in the event of a spill or leak.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
19	Properly store and dispose of hazardous substances.	**Minimum Municipal BMP:** Hazardous materials and wastes shall be stored, managed, and disposed of in accordance with federal, state, and local laws and regulations. Hazardous materials and wastes and their primary storage containers shall also be stored such that they will not come into contact with storm water or other non-storm water flows, even if leaks or spills occur. SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** Hazardous materials are stored within buildings, or within secondary containment and cover, where they will not drain to outdoor areas in the event of a spill or leak, or come in contact with storm water. Hazardous wastes are disposed of as required by law. Material storage areas are checked on a regular basis to verify the structural BMPs are in good condition.
20	Cover, contain, and/or elevate materials stored outside that may become a source of pollutants in storm water or non-storm water.	**Minimum Municipal BMP:** Materials stored outdoors shall be covered, contained, and/or elevated to prevent storm water and non-storm water from contacting and/or transporting materials and pollutants to the storm drain system SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** Materials that are a potential source of pollutants and are regularly stored outdoors, are elevated off the ground using pallets or racks or contained, located away from the path of runoff, and covered using tarps or other means in the event of rain to prevent storm water contact. Materials are checked on a regular basis to verify the structural BMPs (such as roofs, awnings, tarps, etc.) are in good condition.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
21	Label containers to prevent mishandling of hazardous materials and other potential pollutants.	**Minimum Municipal BMP:** Outdoor containers and storage areas for pollutants shall be labeled to facilitate proper material handling and spill response. Hazardous materials and wastes shall be clearly labeled in accordance with all applicable regulations. SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** Hazardous materials are be labeled with the material and include additional information as required by other agencies.
		Planning
23	Develop a written plan that identifies appropriate BMPs, including spill response, and includes procedures for proper implementation.	**Minimum Municipal BMP:** A site-specific or mobile activity-specific written plan, called a BMP Plan shall be maintained that identifies all BMPs to be used and provides clear instruction on how to properly implement each BMP. The BMP Plan shall include written procedures for preventing and responding to spills appropriate in scale to facility activities and potential spills. The BMP Plan shall be appropriately scaled to the size of the facility and potential for discharges. The BMP Plan shall be updated as site conditions or activities change. The BMP Plan must include an employee training program. SDMC §43.0307(b). **Fleet Services Division BMP Implementation:** The Minimum Municipal BMPs detailed in this table serve as the BMP plan for Fleet Services Division Facilities.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
Outdoor Work Areas		
24	Implement controls to minimize pollution from exposed outdoor work areas.	**<u>Minimum Municipal BMP:</u>** Activities that may generate pollutants shall be conducted in covered, contained areas, or equivalent measures taken to prevent the discharge of associated pollutants. When these activities are conducted outside, the work areas shall be cleaned at least once a day to minimize pollutant accumulation, and the activities shall not be conducted when it is raining unless measures have been taken to prevent the discharge of associated pollutants. Work areas that are not covered and contained shall also be located such that runoff flowing through the work areas is minimized. Work areas shall be designed such that concentrated flows are not directed through the work areas. SDMC §43.0307(a). **<u>Fleet Services Division BMP Implementation:</u>** All maintenance activities are performed within work bays where facilities exist. Where no facility has been built, maintenance occurs in an area contained by a berm, and wattles are used where needed. No storm drain system connections are in close proximity to the work area. The work area is cleaned at the conclusion of the activity to remove accumulated sediment, debris, oil and grease, particulate matter, and other pollutants, as necessary. Outdoor activities are not conducted during rain events unless adequate precautions have been taken to prevent pollutant discharge to the storm drain system.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
Spill Prevention and Response		
25	Prevent or capture liquid leaks from vehicles and equipment.	**Minimum Municipal BMP:** Leaking vehicles or equipment shall be repaired promptly. Drip pans or other equivalent means shall be used to capture spills or leaks of oil and other fluids from vehicles awaiting maintenance and during maintenance activities. Captured fluids shall be disposed of in accordance with applicable hazardous materials regulations. SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** Municipal vehicles and equipment are monitored daily for leaks, and taken to the fleet services vehicle maintenance facility or a City approved equipment repair vendor immediately if necessary. If vehicles or equipment are leaking, drip pans are used until repairs are completed, and affected areas are cleaned up with dry methods and disposed of as a regulated waste.
26	Maintain a readily accessible spill cleanup kit that is appropriate for the materials stored onsite.	**Minimum Municipal BMP:** Materials and equipment appropriate for the type and quantity of potential spills shall be kept onsite and with any mobile activities, in order to serve as a spill cleanup kit. Keep cleanup materials in close proximity to locations where spills may occur, with instructions for their use clearly displayed. SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** Spill cleanup kit materials, which may include a combination of absorbents, mats, and booms, are located in close proximity to liquid storage locations, appropriate to the type and size of potential spills. Response procedures may include complete spill collection and disposal, or sealing or otherwise protecting storm drain inlets or containing the spill and calling the Storm Water Division to assist with cleanup efforts. Emergency phone numbers are posted in a visible place with the spill kit.
28	Immediately clean up spills.	**Minimum Municipal BMP:** Spills shall be cleaned up immediately and prevented from entering the storm drain system. Spills that enter a storm drain and cannot be fully recovered shall be reported promptly to the

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
		City's Storm Water Division Hotline at 619-235-1000. SDMC §43.0307(a). **<u>Fleet Services Division BMP Implementation:</u>** Spills that occur on City property or in the City's right-of-way are primarily the responsibility of the party that caused the spill to clean up. If a responsible party cannot be identified or fails to take immediate action, responsibility will fall to the City department or division responsible for maintenance of the area in which the spilled material is present, which may extend into the storm drain system. In the event of a minor spill, either hazardous or non-hazardous in nature, absorbent is applied to the spill area, and potentially affected drain inlets are blocked off as necessary during cleanup activities. Absorbents are left in place until all residue has been absorbed. Then the spent material is swept, shoveled, or otherwise mechanically removed using dry methods and disposed of to a dumpster or to a hazardous waste facility, as appropriate. In the event of a major spill of non-hazardous materials, where absorbents would be insufficient to retain all spilled materials, all potentially affected drains are blocked off, and the spilled material is confined to the spill area until the spill response staff, is able to remove it. Spill kit materials, such as booms, sandbags, and vendor products, may be used to contain the spill, if the structure of the existing area is insufficient to prohibit material from spreading. If a hazardous material spill of a reportable quantity occurs, which requires external resources to manage or poses an immediate health and safety risk, the department or division that caused the spill, or to whom the spill was reported, is responsible for contacting the Fire-Rescue Department. The Fire-Rescue Department will either abate and mitigate the spill internally, or delegate cleanup responsibilities to the citywide hazardous waste contractor. See Section 3 for detailed information on discharge reporting and notification requirements.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
29	Temporarily protect storm drains from non-storm water discharges while conducting activities that have the potential to result in a discharge.	**<u>Minimum Municipal BMP:</u>** If activities cannot be fully contained, or minor failures in containment would potentially result in discharges of non-storm water to the storm drain system, temporary measures shall be used to protect storm drains. Any activity-related materials that enter the storm drain system shall be removed promptly and disposed of appropriately (in accordance with other minimum BMPs). SDMC §43.0304(a). **<u>Fleet Services Division BMP Implementation:</u>** Prior to starting any activities with the potential to generate or release any non-storm water discharge, all potentially affected storm drain system connections are identified, and steps are taken to prevent non-storm water or pollutants from entering, as appropriate. Protections may include blocking off inlets or gutters, such as with mats or sandbags, directing anticipated flows to onsite landscaped or pervious area(s) where it can infiltrate or evaporate without resulting in erosion or runoff to the storm drain system or any adjacent property, installing a capture and collection point, such as a sandbag barrier and vacuum, or other effective means.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
		Training and Education
30	Provide pollution prevention signage for storm drains.	**<u>Minimum Municipal BMP:</u>** Pollution prevention signage shall be provided for all onsite storm drain inlets and catch basins with prohibitive language (e.g., "No Dumping – Drains to Ocean"). SDMC §43.0307(a). **<u>Fleet Services Division BMP Implementation:</u>** All municipal storm drain inlets located on City owned parcels managed by the Fleet Services Division are labeled with signage such as "No Dumping—Goes to Ocean/No Tire nada—Llega al Mar/"Think Blue". Most frequently, this requirement is accomplished through storm drain stenciling with materials provided by "Think Blue". Medallions, placards, concrete stamping, and other equivalent methods are also used. Label placement and legibility is checked annually during routine inspections, and if necessary, replaced or refreshed before September 30 of each year.
31	Implement a pollution prevention system for uncovered outdoor sources of pollutants.	**<u>Minimum Municipal BMP:</u>** A system to remind employees or contractors to complete required maintenance shall be provided for trash areas without overhead coverage, uncovered outdoor work areas, and other outdoor areas of the site that require frequent maintenance to mitigate pollution potential. SDMC §43.0307(a). **<u>Fleet Services Division BMP Implementation:</u>** The system used by the Fleet Services Division may include signs posted in work areas or in break areas, maintenance logs completed by employees, or email reminders sent to responsible employees or contractors whenever maintenance needs to be done, as appropriate to the specific area or activity.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
32	Train appropriate employees on storm water pollution prevention.	**Minimum Municipal BMP:** Initiation training and annual refresher training shall be provided to all employees with full or partial responsibility for BMP implementation on- or off-site. All such employees shall be familiar with the BMP Plan for onsite or mobile activity. Records of training shall be kept for at least three years, including topics, dates, and employee names, at a minimum, and shall be available upon request. SDMC §43.0307(b). **Fleet Services Division BMP Implementation:** Municipal Employees will receive general storm water training by the Storm Water Division at the time of hire. Additional training will be conducted by the Fleet Services Division annually, to include training on the implementation of all components of the applicable Minimum Municipal BMP Plan.
Waste Management		
33	Keep trash/waste disposal areas free of exposed trash, sediment, and debris.	**Minimum Municipal BMP:** Disposal areas for trash and other wastes shall be cleaned as frequently as necessary to keep these areas free of loose trash, litter, debris, liquids, powders, and sediment. Liquid waste, hazardous waste, medical waste, universal waste, and other items prohibited by current regulations shall not be placed in solid waste dumpsters. SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** Trash and debris are removed throughout Fleet Services Division facilities daily through pickup or sweeping activities, including around dumpsters, to ensure all areas remain free of loose litter, debris, liquids, powders, and sediment. If wet cleaning is needed, all wash water will be captured and disposed of according to Minimum Municipal BMP 3, above. Sufficient disposal containers are provided to meet volume demands. Dumpsters are repaired or replaced if found to leak.

BMP ID[1]	BMP Title	Fleet Services Division Minimum Municipal BMPs
36	Protect waste storage areas from contact with storm water and non-storm water flows on to the property.	**Minimum Municipal BMP:** Stored trash and other wastes shall be protected from contact with storm water and non-storm water flows. Trash and other wastes shall be contained to prevent transport of trash off site, and to keep surrounding areas and on site storm drains free of trash and other wastes. SDMC §43.0307(a). **Fleet Services Division BMP Implementation:** Lids are kept closed on trash cans and dumpsters to prevent rainwater from entering. Trash and waste storage areas are located away from storm drain inlets and outside the paths of concentrated flows.

[1] BMP ID numbers correspond to the ID number on the master list of Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources found in Appendix IX. Only the applicable Minimum Municipal BMPs from Appendix IX are included in this table.

General Storm Water Training

The Storm Water 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”.

Fleet Services Division-Specific Training

Fleet Services Division will create, execute, and fund training sessions that cover the implementation of the Minimum Municipal BMPs in Table 7.3.15-3. The Storm Water Division can assist departments with the development of training materials at their request.

Table 7.3.15-3. Fleet Services Division-Specific Minimum Municipal BMP Training(s)

Training Module/Item	Staff Level	Schedule
Parking Lot Cleanup Minimum Municipal BMPs	Supervisor, Crew	Ongoing
Material Management Minimum Municipal BMPs	Supervisor, Crew	Ongoing
Painting and Paint Disposal Minimum Municipal BMPs	Supervisor, Crew	Ongoing
Equipment Washing and Cleaning Minimum Municipal BMPs	Supervisor, Crew	Ongoing

7.3.15.2 Inspection Procedures

The City inspects all municipal facilities twice annually. The purpose of the facility inspections is to evaluate the adequacy of existing Minimum Municipal BMPs, modify and improve BMPs where necessary, and identify any potential pollutant discharges. As shown in Table 7.3.15-4, 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 7.3.15-4. Municipal Facility Inspection Requirements

Inspection	Timeframe
First	September
Second	January - April

Additionally, Fleet Services Division facilities whose activities are closely aligned with those of industrial or commercial businesses have been identified. The Storm Water Division will perform annual inspections of select municipal facilities. When the Storm Water Division inspects a municipal facility, that inspection will count for one of the two annually required municipal inspections for that facility. These facilities are denoted within the municipal facility inventory, provided as Appendix II.A.

7.3.15.3 Enforcement

The City enforces its legal authority for all its inventoried existing development, as necessary, to achieve compliance in accordance with the Municipal Permit by enforcing its

Storm Water Management and Discharge Control Ordinance (SDMC §43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I).

If as a result of any inspection, it is determined that improvements to Minimum Municipal BMP implementation are required, the Fleet Services Division will perform the necessary correction within 30 calendar days, or prior to the next predicted rain event, whichever is sooner. In the event that corrections cannot be completed within this timeframe, the Fleet Services Division will develop an anticipated schedule for corrections to be made, and provide a rationale for the extension in the system used to track deficiencies and correction activities. This information, as well as the record of improvements and changes made, will be provided to the Storm Water Division as part of the annual reporting process.

Following the completion of corrective actions, the Fleet Services Division will conduct a follow-up inspection of the BMPs to verify that the original issues have been resolved. In the event that additional corrections are necessary, a revised anticipated schedule for corrections to be made will be developed.

If the responsible City staff member or group does not perform the necessary corrective actions in response to the direction of their immediate superior, escalated enforcement action will be taken by involving higher-ranking representatives within the responsible department or division, who may enact internal disciplinary procedures, until the deficiencies are resolved.

Refer to the Enforcement Response Plan (Appendix XIII) for a complete listing of potential escalated enforcement actions.

Pollutant Discharge Notification

Certain non-storm water discharges, because of their nature or magnitude, require timely reporting to the RWQCB. A significant threat to water quality or human health is determined on a case-by-case basis by the respective department or 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 the Storm Water Ordinance Section 43.0305 “Conditionally Allowed Non-Storm Water Discharges” to review the list of conditionally allowed non-storm water discharges. 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.

When the respective department or division determines that a discharge poses a significant threat to water quality or human health, the respective department or division must provide verbal notification to the RWQCB within 24 hours of becoming aware of the discharge. Additionally, a more detailed written report of the event and follow up actions must be sent by the respective department or division to the RWQCB within five days of the discharge.

The respective department or division will also notify other regulatory agencies as necessary. See Section 3 for detailed information on discharge reporting and notification requirements.

7.3.15.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the Jurisdictional Runoff Management Plan (JRMP) annual report is due by October 31, 2015. Starting the following fiscal year, Water Quality Improvement Plan annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal annual reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

7.3.16 Additional Water Quality Improvement Plan Strategies for the Storm Water Division

In addition to implementing the Minimum Municipal BMPs and other storm water program activities described in sections 7.3.1 through 7.3.15, the City of San Diego (City) Storm Water Division of the Transportation & Storm Water Department has identified additional BMPs, or strategies, to achieve water quality improvement goals in affected Watershed Management Areas (WMAs). The City has developed these strategies and included them in the City's six watershed-based Water Quality Improvement Plans (WQIPs), as required by Section B.3 of the Municipal Permit. The Storm Water Division is responsible for managing the additional strategies listed in Table 7.3.16-1. More information about the specific strategies listed below is available in Jurisdictional Runoff Management Plan Appendix XX, which is a table listing all the strategies from its six WQIPs. The WQIP strategies are subject to change and are contingent upon annual budget approvals and funding availability, and they will be modified through the adaptive management process as needed.

Responsible Department(s) or Division(s):

- Storm Water Division of the Transportation & Storm Water Department

Table 7.3.16-1. Additional Municipal Program WQIP Strategies

Strategy ID(s)	Strategy
CSD-JRMP-24*	Enhanced catch basin cleaning to increase pollutant removal (up to 4 times per year) in the rainy season.
CSD-JRMP-25*	Enhanced catch basin cleaning to increase pollutant removal (between 2-4 times per year in medium priority areas in the rainy season).
CSD-JRMP-31*	Identify sewer leaks and areas for sewer pipe replacement prioritization.
CSD-JRMP-34*	Enhance street sweeping through equipment replacement (replace mechanical sweepers with regenerative air sweepers) and route optimization (sweep all routes twice per month) in targeted areas.
CSD-JRMP-35*	Initiate sweeping of medians on high-volume arterial roadways.
CSD-NS-01	Conduct a special study on outfall repair/relocation.
CSD-NS-13	Trash mitigation in the western portion of the Otay River HU.
CSD-NS-15	Coordinate and work with Parks and Recreation, where appropriate, to ensure that the City is not creating erosion issues.

Strategy ID(s)	Strategy
CSD-NS-16	Conduct a Comprehensive Benefits Analysis to identify benefits other than water quality that are applicable to each of the specific WQIP strategies.
CSD-NS-17	Address and clean up trash from transient encampments with collaboration from the Environmental Services Department, which consults with the Homeless Outreach Team.
CSD-NS-19	Coordinate with Fleet Services to replace City-owned vehicle brake pads with copper-free brake pads as they become commercially available.
CSD-NS-22	Coordinate with appropriate City Departments that monitor for erosion, and complete minor repair and slope stabilization on municipal property.
CSD-NS-32	Conduct a Cost of Service Study.
CSD-NS-49	Los Peñasquitos Wetland Restoration Project
CSD-NS-50	San Dieguito Wetland Restoration Project
CSD-NS-51	Collaboration with the Regional Board.
CSD-NS-52	Collaborate with Metals TMDL RPs and the Regional Board to Adopt Site Specific Objectives
CSD-NS-53	Refinement of Water Quality Regulations
CSD-NS-54	Collaboration with Federal, State and Local Agencies
CSD-STRUCT-01	Restoration of natural areas to allow water percolation, and installation of site appropriate drainage devices to protect Sunset Cliffs Natural Park from soil erosion.[1]
CSD-STRUCT-02	San Diego River Restoration and Trash Removal Project: The City of San Diego will implement a project involving restoration of native habitat and trash removal along 5,750 feet of the San Diego River covering approximately 57 acres. Work on this project is scheduled to begin in 2016 and be completed by 2022.[1]
CSD-GI-01 to CSD-GI-14, CSD-GI-16	Green Infrastructure[1]
CSD-GS-01 to CSD-GS-10	Green Streets[1]

Strategy ID(s)	Strategy
CSD-MUTA-01, CSD-MUTA-03 to CSD-MUTA-07, CSD-MUTA-09	Multiuse Treatment Areas: Infiltration and Detention Basins[1]
CSD-MUTA-16, CSD-MUTA-17	Multiuse Treatment Areas: Stream, Channel and Habitat Rehabilitation Projects[1]
CSD-PDP-01 to CSD-PDP-06	Water Quality Improvement BMPs: Priority Development Projects[1]
CSD-WQBMP-01 to CSD-WQBMP-03	Water Quality Improvement BMPs: Proprietary BMPs[1]
CSD-WQBMP-04 to CSD-WQMP-08	Water Quality Improvement BMPs: Dry Weather Flow Separation and Treatment Projects[1]
CSD-AddOp-01, CSD-AddOp-02	Additional Opportunities
WMA-1 to WMA-12, WMA-14, WMA-15	Watershed Management Area (WMA) Strategies

[1] In some cases, construction and/or maintenance of projects in these categories may require coordination with other City of San Diego departments, divisions, or agencies.

* Strategies marked with an asterisk are considered "jurisdictional" in the MS4 Permit, but are considered enhancements to the JRMP to target highest priority water quality conditions.

8.0 Residential Areas

8.1 Introduction

Principally, the City of San Diego (City) Transportation & Storm Water Department (T&SW), Storm Water Division staff oversee the residential component of the Jurisdictional Runoff Management Plan (JRMP). Other departments/divisions, such as the Public Utilities Department (PUD), Water Division, Police Department, and the Development Services Department contribute to the City's residential program.

Responsible Department(s) or Division(s):

- Storm Water Division of the Transportation & Storm Water Department

Supporting Department(s) or Division(s):

- Public Utilities Department, Water Division (Section 8.4.1.3 only)
- Police Department (Section 8.4.1.3 only)
- Development Services

The City has developed an extensive program that aims to reduce pollutant runoff from residential areas and activities to the maximum extent practicable (MEP). About a quarter of the City has a residential land use designation, which includes single- and multi-family residences, and a small portion of other residential areas. Since residential land use comprises such a large area of the City, residential activities can have a considerable effect on the quality of receiving waters in and around the City. The Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit) mandates that the City implement a residential component of the Jurisdictional Runoff Management Plan (JRMP), in an effort to further reduce the discharge of pollutants in storm water runoff. The City's residential program must meet the requirements of the Municipal Permit, as described in Table 8-1 on the following page.

Table 8-1. Permit Requirements – Residential

JRMP Section	Municipal Permit Section	Requirement (Summary)
8.2, Appendix VI	E.5.a.	The City must maintain, and update at least annually, a watershed-based inventory and map of the existing development within its jurisdiction that may discharge a pollutant load to and from the municipal separate storm sewer system (MS4; hereafter, “storm drain system"). The inventory must include the required descriptions listed in the Municipal Permit.
8.3, Appendix IX	E.5.b.(2)	The City must designate a minimum set of best management practices (BMPs) required for all inventoried existing development. Promote and encourage the implementation of BMPs to reduce pollutants in storm water discharges to the MEP and prohibit discharges associated with the application, storage, and disposal of pesticides, herbicides and fertilizers from residential areas.
8.4.1	E.5.c.	Conduct inspections of inventoried existing development to ensure compliance with storm water requirements.
8.4.2, 8.4.3, 8.4.4	E.5.c.(3)	Record and track inspection findings.
8.4.3, 8.4.6	E.5.c.(1)(b)	Implement all follow-up actions (i.e., education and outreach, re-inspection, enforcement) necessary to confirm compliance with storm water requirements.
8.4.2, 8.4.3, 8.4.4	E.5.c.(1)(a)	Establish appropriate inspection frequencies for residential management areas (RMAs).
8.5	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

The JRMP activities described throughout the remainder of this chapter fulfill the requirements of the Municipal Permit listed in Table 8-1. These JRMP activities are also summarized and included as strategies in each of the City’s six Water Quality Improvement Plans (WQIPs). Additional strategies have been identified to help meet the water quality goals in the WQIPs; those strategies are identified in Section 8.6. These strategies will be

managed by the Storm Water Division and are considered enhancements to the Residential Program. The full list of WQIP strategies is included as Appendix XX of the JRMP.

8.2 Residential Inventory

In accordance with the new Municipal Permit requirements the City has created an inventory with distinct residential areas, known as RMAs, as part of the existing development inventory. Inventoried residential areas are managed and tracked through the use of an electronic database and Geographic Information System (GIS). The residential inventory, included in Appendix VI, includes the following information:

1. Name and location (hydrologic subarea (HSA) and address).
2. Status of area as active or inactive.
3. Identification if the area is or includes a Common Interest Area/Home Owner Association, or mobile home park.
4. Identification of pollutants generated and potentially generated by the area.
5. Whether the area is adjacent to an environmentally sensitive area (within 200 feet).
6. Whether the area is tributary to and within the same HSA as a water body segment listed as impaired on the Clean Water Act Section 303(d) List of Water Quality Limited Segments and generates pollutants for which the water body segment is impaired.

The City's Storm Water Division maintains an annually updated map showing the location of the RMAs, watershed boundaries, and water bodies. The City's RMAs have been organized first by neighborhood and then by Watershed Management Area (WMA), as displayed in the RMA map included in Appendix VI. An inventory of the RMAs including associated potential pollutants is also listed in the table in Appendix VI. The RMA's potential pollutants have been generated in accordance with the Regional Workgroup format to remain consistent with other City inspection programs. However, potential pollutants associated with each RMA may be adjusted based on the associated highest priority water quality conditions (HPWQCs) identified by the respective WMA's WQIP and data collected during field inspections. Some information in the RMA inventory has been intentionally left blank, pending further analysis and data collected during future field inspections.

8.3 Best Management Practice Requirements

The City has updated the Minimum Residential BMPs required for residences, which is included in the Minimum BMPs for Residential, Industrial, Commercial and Municipal Sites/Sources (Appendix IX). Any future changes to the Minimum Residential BMPs will be

reported to the RWQCB during JRMP annual reporting. Section 3.0 ("Illicit Discharge Detection and Elimination") of the City's JRMP provides additional information on prohibited and conditional discharges to the City's storm drain system.

Although there are many BMPs included in the Minimum Residential BMPs, the City's residential oversight program will initially focus on providing education on and enforcing the following BMPs:

- Eliminate irrigation runoff to the storm drain system. Minimizing irrigation runoff also prevents fertilizers and pesticides applied to landscaping from being transported to the storm drain system.
- Eliminating erosion by protecting unpaved areas, including landscaping, from erosion using vegetative or physical stabilization such as mulch, gravel, or retaining walls.
- Pick up and properly dispose of pet waste.
- Eliminate the accumulation of trash and yard waste going into the storm drain system, including the curb and gutter.

The City's residential program will focus on these BMPs because they are consistent with Citywide water conservation efforts and will address many WQIP goals, as listed in Appendix XX, for the City's WMAs. Information regarding the City's educational outreach for residences can be found in Sections 8.4.5 and 9.0.

8.3.1 Additional Controls for Residential Areas

In addition to the Minimum Residential BMPs described in Appendix IX, the City has developed an additional program to identify, prioritize, and implement potential projects to retrofit areas of existing development and to rehabilitate streams, channels, and habitat in order to enhance receiving water quality and local communities. Appendix XIX of this document describes the City's retrofit and rehabilitation program in further detail.

8.4 Program Implementation

The City's residential program focuses primarily on addressing the HPWQCs for each WMA, as established within the WQIPs. For example, since a HPWQC for the Peñasquitos WMA is the impairment of habitat by hydromodification and sedimentation/siltation during wet weather conditions, residential educational outreach, inspections, and enforcement in the Peñasquitos WMA will place an emphasis on addressing erosion and activities that may contribute sediment to the storm drain system. Other watersheds will focus on their specific priority conditions.

The City continually adjusts the focus of its residential program to target the greatest sources of pollutants contributing to the HPWQCs. For this reason, the City's residential program discussed below may change through an adaptive management process.

The Storm Water Division has established an iterative implementation strategy that most efficiently meets the goals of the residential program through continual program planning, implementation, assessment, and improvement which will result in continual prioritizing of efforts into specific RMAs over the next five years.

This section describes the mechanisms the City will utilize in order to assess non-storm water discharges from residential land uses within the City's jurisdiction and enforce the implementation of Minimum Residential BMPs in order to prevent storm water pollution and protect our natural resources.

8.4.1 Oversight Programs and Procedures

This section describes the various City programs that provide oversight of Minimum Residential BMP implementation and serves as the primary means for RMA inspections. As the program is implemented over the next five years, adaptive management will be used to determine if additional programs will be needed for inspections. Any updates to the program will be provided during the annual reporting process.

8.4.1.1 Dry Weather Major MS4 Outfall Monitoring

Routine field monitoring of non-storm water discharges by City staff is a primary mechanism for overseeing RMAs and detecting non-storm water discharges to the City's storm drain system. If an illicit connection or illicit discharge (IC/ID) is observed during routine monitoring of residential areas, such as during the City's Dry Weather Major MS4 Outfall Monitoring Program, the Storm Water Division staff conducting the monitoring will investigate the discharge immediately and attempt to eliminate the discharge through providing education and/or a verbal warning to the responsible party.

Monitoring staff report violations observed in the field to the Storm Water Division Hotline at the time the discharge is discovered or upon completion of investigation to allow Code Enforcement staff to follow-up accordingly. If the IC/ID is also related to a water conservation issue, such as improper car washing or irrigation runoff that does not enter the storm drain system, monitoring staff will report the issue to the PUD Water Division's Water Waste Hotline. Procedures for investigating non-storm water discharges are included in Section 3.0 ("Illicit Discharge Detection and Elimination") of this JRMP.

8.4.1.2 Responding to Public Complaints

The City's Storm Water Division Hotline (619-235-1000), Water Waste Hotline (619-533-5271), and the "Waste No Water" smart phone application are other primary mechanisms for overseeing RMAs and for reporting residential violations of the City's Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code Sections

43.0301 to 43.0312) (Storm Water Ordinance) (see Appendix I). The City's Storm Water Division Hotline is advertised through various media as part of the City's storm water education program, "Think Blue". "Think Blue" is the City's principal method for distributing information to the public regarding the City's Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX) and is described in further detail in Section 9.0 ("Public Education and Participation").

If a residential storm water violation is reported to the City or observed by City or contract staff, the Storm Water Division's Code Enforcement staff will typically conduct an onsite or patrol assessment of where the violation was reportedly observed depending on the nature of the complaint. Complete evaluations will only be performed in response to validated complaints.

Reports of water waste received via the Water Waste Hotline are handled by the PUD Code Enforcement staff. Instances of water waste that reach the storm drain system (including the curb and gutter), such as irrigation runoff and improper car washing, will be referred to the Storm Water Division's Code Enforcement Officers for investigation.

Both PUD and Storm Water Code Enforcement staff will take and document appropriate actions in response to validated reports of Municipal Code violations. Code Enforcement staff track and record all enforcement actions in an electronic database. Information from the database will be made available to RWQCB staff upon request and will be reported through the annual JRMP reporting process. Complaint and enforcement records include, at a minimum:

- Name and location of residential area (address and HSA) consistent with the inventory name and location.
- Date of violation and/or complaint investigation.
- Investigation method (i.e. patrol, onsite, etc.).
- Observations and findings from the investigation.

For onsite evaluations of residential areas, records also include:

- Description of any problems or violations found during the investigation.
- Description of enforcement actions issued, including escalated enforcement actions (i.e. written/verbal warning, Notices of Violation (NOV), etc.).
- The date Minimum Residential BMP deficiencies or violations were resolved.

8.4.1.3 Other Oversight Mechanisms

Residential management areas are also assessed for the presence of non-storm water discharges by other City departments or programs during routine field work. Some examples of other City staff that routinely perform field work in residential areas are

discussed below. All City staff are encouraged to and trained on how to identify and report non-storm water discharges.

***Public Utilities Department, Water Division* –** Water meter readers and other PUD staff will leave a door hanger at a residence observed to be in violation of the City's water conservation regulations, storm water regulations, or other local, state, or federal regulations (i.e., mandatory State drought regulations) if water waste is observed during routine field work. Violations are tracked in an electronic database which records at least the violators contact information and the location of the violation. Complaint data is forwarded to the Storm Water Division at least annually for incorporation into annual reports and for use in assessing the residential oversight program, which includes at least the information presented in the bulleted list above.

The PUD also performs pre- and post-project inspections at residences that undergo retrofit projects as part of the City's grass replacement, microirrigation installation, and rain barrel rebate programs. Data collected for the rebate program includes responsible party information (i.e., name, phone number, email, etc.), project location (including address and watershed), and other project details (such as location and size of rain barrel, area of roof draining to barrel, whether smart controllers were installed, proposed square feet of grass removed, etc.). This data is provided to the Storm Water Division at least annually.

Street Sweeping (T&SW) – Street sweepers cover a large portion of the City during routine sweeping activities, which provides an opportunity for substantial oversight of the City's RMAs. Street sweeping staff provide a significant oversight of the City and are trained to report significant storm water violations, particularly items such as yard waste in the curb and gutter. A list of the areas within the City that are routinely swept and the associated sweeping frequencies is posted on the City's website (sandiego.gov).

Retired Senior Volunteer Patrol – The City of San Diego Police Department's Retired Senior Volunteer Patrol (RSVP) assists in providing an increased level of crime prevention within specific geographic boundaries, including residential areas, by providing additional patrolling. This program also provides an opportunity for significant oversight of residential areas. Additionally, RSVP officers will leave door hangers at residences where water waste is observed as part of the City's Water Conservation Program.

Development Services Department (DSD) – The DSD Neighborhood Code Compliance Division staff perform routine mobile home park inspections and responds to complaints pertaining to other residential care facilities and will perform inspections as needed.

Storm Water Division (T&SW) – The Storm Water Division is responsible for regular treatment control BMP inspections for approximately 300 residences in the City's jurisdiction. If an IC/ID is observed during an inspection, in addition to reporting the

violation to the Storm Water Division Hotline, inspectors will record the violation on the inspection form and provide education to the responsible party where feasible.

8.4.2 Residential Inspections

The Municipal Permit requires that RMAs within the City are inspected once within the Permit term, at a minimum. Inspection frequencies are determined by the potential for the residential area to contribute non-storm water discharges and pollutants and in response to valid complaints received from the public or from City staff. Frequencies also reflect the priorities established within the WQIPs for each WMA, as presented in Appendix XX.

The RMA Patrol Program is the primary method through which residential areas are inspected. RMA Patrol protocols have been prepared to standardize the process (Appendix VI). The RMA Patrol protocols include discussions of the following information:

1. Patrol types
2. Required minimum BMPs for residential areas
3. Possible issues associated with different residential types
4. Inspection and follow up requirements
5. Violation protocols, follow-up, and enforcement
6. Data management and reporting

Other mechanisms used by the City to oversee residential areas, such as leveraging inspections performed by PUD staff and treatment control BMP inspections at residential Priority Development Projects, as well as developing new inspection and/or patrolling efforts to target residential areas, are discussed in the following section.

Inspections of RMAs are completed through the following:

1. **Complaint investigations.** Investigations are performed regularly in response to valid complaints reported to the Storm Water Division Hotline and PUD's Waste Water hotline by many City staff members that routinely perform field work such as PUD, Operations & Maintenance, and Park and Recreation staff, and from members of the public.
2. **Dry weather major MS4 outfall monitoring**. Site visits to a major MS4 outfall serves as an inspection of a large portion or the RMA since monitoring staff are essentially inspecting the major outfall's entire drainage area. If an outfall is found to be dry, the RMA is considered to be inspected. If there is flowing or ponded water present at the outfall, monitoring staff proceed to perform a discharge investigation as discussed in Section 3.0 ("Illicit Discharge Detection and

Elimination"). If monitoring staff visit residential areas within the outfall's drainage area, then this too contributes to the inspection of an RMA.

3. **RSVP patrols.**
4. **PUD inspections.** This includes routine inspections performed by water meter readers, inspections performed as part of the City's retrofit rebate programs, and complementary surveys/audits of residences for irrigation audit).
5. **Street sweeping routes.**
6. **Structural BMP inspections.** There are several hundred residential properties on the City's structural BMP inventory. Discharges may be observed and reported by inspection staff making visits to these areas for structural BMP inspections..

8.4.3 Follow-Up Inspections

The City will implement all follow-up actions necessary to require and confirm compliance with the applicable Minimum Residential BMPs, local ordinances, and permits where feasible. The Storm Water Division Code Enforcement staff or the PUD Code Enforcement staff conduct follow-up inspections in response to valid complaints as needed, which will be tracked in the respective departmental electronic database.

Code enforcement staff may utilize a variety of follow-up actions in response to observed or reported violations of the City's Storm Water Ordinance. These actions may include providing education, and issuing verbal or written warnings, NOVs, and Administrative Citations. Depending on the severity of the violation, follow-up to a reported or observed violation may include providing education to the responsible party(ies) regarding the City's storm water regulations or enforcement. Education provided to the responsible party may include providing factsheets, discussion of options with the responsible party on how to better implement Minimum Residential BMPs, such as changing procedures for routine activities (e.g., car washing, landscaping, etc.) or participating in the City's various rebate programs for Low Impact Development retrofit projects (e.g., rain barrel installation, grass replacement, microirrigation conversion).

If a follow-up inspection is necessary, Code Enforcement Officers will conduct a follow-up inspection after a reasonable amount of time for resolution has passed (about two weeks), or on the date noted for compliance on any issued written warning or NOV, and/or on the date agreed upon with the responsible party. Enforcement actions taken by Code Enforcement staff in response to non-compliance are discussed in Section 8.4.6.

8.4.4 Data Management and Program Evaluation

Inspection and enforcement data collected during residential inspections discussed previously in Section 8.4.2 will be used to evaluate the effectiveness of the City's residential oversight program in reducing non-storm water discharges to the City's storm drain system. To ensure the required inspection frequencies are being met, the Storm Water Division will utilize GIS, specifically geocoding, to routinely evaluate the data collected from the oversight programs. Regular evaluation will assist in identifying potential gaps in the City's residential oversight program, which will allow the City to focus or adjust efforts and resources as needed. This process will ensure that all RMAs are assessed for the presence of non-storm water discharges within the five-year Permit term. If significant geographic gaps are found in the data collected, the City will work with multiple departments as possible and utilize Storm Water Division staff to ensure all RMAs have been inspected at least once within the Permit term through additional field work or other assessment methods as needed.

8.4.5 Residential Education

Education and outreach aimed at residents helps facilitate the implementation of Minimum Residential BMPs. Since multiple jurisdictions lie within each WMA, a mass media campaign is the most effective and beneficial in reaching residents across the region. For this reason, the City will continue to implement its "Think Blue" outreach program as discussed in detail in Section 9.0 ("Public Education and Participation") of this document. "Think Blue" provides a broader, more universal message and normative behavior reinforcement than individual cities can provide on their own. Initially, residential outreach materials will focus on educating residences on appropriate landscaping practices, such as eliminating irrigation runoff and appropriate pet waste management.

8.4.6 Enforcement

The City enforces its legal authority for all its inventoried residential management areas, as necessary, to achieve compliance in accordance with the Municipal Permit as described within this section. Enforcement of the Minimum Residential BMPs will be carried out by both the Storm Water Division Code Enforcement staff and the PUD Code Enforcement staff. The City will continue to utilize escalated enforcement mechanisms when necessary to address particularly problematic individuals, activities, and areas.

The residential program has been designed to ensure that adequate City enforcement, complaint investigation, and complaint reporting is conducted, so that pollutants associated with residential activities and areas are minimized to the MEP. The residential program also has an education component, described in Section 9.0 ("Public Education and Participation"), so that residents are made aware of any updated Minimum Residential BMP requirements, such as eliminating discharges from irrigation runoff. The City will continue

to use enforcement mechanisms when necessary to address particularly problematic individuals, activities, and areas.

During investigations of incidents reported to the hotline or discovered by City or contract staff during routine field work that are associated with a residential source, City staff address issues of storm water concern where feasible, and provide education where appropriate. Voluntary compliance and escalating enforcement mechanisms are implemented to immediately eliminate an IC/ID once the source has been identified. Violations to the City's Municipal Code will be investigated by City personnel with enforcement authority. Violations are documented and depending on the nature and severity of the violation, enforcement may consist of any of the enforcement measures described in the Enforcement Response Plan (Appendix XIII), which typically includes education, verbal warnings, written warnings, NOVs, and Administrative Citations in escalating order.

If compliance is not achieved, Code Enforcement staff will contact the responsible party for information on why the violations have not been corrected, as the Permit requires that violations are corrected within 30 days of becoming aware of the violation or that rationale explaining why the corrections have not been made is recorded. Follow-up inspections are documented in the Enforcement Officer's activity log and investigation reports.

8.5 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the JRMP annual report is due by October 31, 2015. Starting the following fiscal year, WQIP annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

8.6 Additional Water Quality Improvement Plan Strategies for the Storm Water Division

In addition to the JRMP strategies described in the preceding sub-sections, the Storm Water Division has identified additional BMPs, or strategies, to achieve water quality improvement goals in affected WMAs. The City has developed these strategies and

included them in the City's six watershed-based WQIPs, as required by Section B.3 of the Municipal Permit. The Storm Water Division is responsible for implementing the additional strategies listed in Table 8-2. More information about the specific strategies listed below is available in JRMP Appendix XX, which is a table listing all the strategies from the City's six WQIPs. The WQIP strategies are subject to change and are contingent upon annual budget approvals and funding availability, and they will be modified through the adaptive management process as needed.

Table 8-2. Additional Residential Program WQIP Strategies

Strategy ID(s)	Strategy
CSD-NS-06	Residential and Commercial BMP: Rain Barrel
CSD-NS-07	Residential and Commercial BMP: Grass Replacement
CSD-NS-08	Residential and Commercial BMP: Downspout Disconnect
CSD-NS-09	Residential and Commercial BMP: Microirrigation
CSD-NS-10	Provide Onsite Water Conservation Surveys.

9.0 Public Education and Participation

9.1 Introduction

This section is applicable to the Transportation & Storm Water Department (T&SW), Storm Water Division. Routine daily activities can potentially contribute pollution to urban runoff and consequently affect the quality of the receiving waters. While some individual activities may not have a significant effect on water quality, collectively these activities may contribute a significant amount of pollutants to receiving waters. Receiving water quality is a concern to all, not only because water degradation can have a negative effect on public health and safety, but it also can negatively impact the aquatic environment, riparian habitat, tourist and beach-oriented economies, property values, and the aesthetic value of the area surrounding the water body.

Responsible Department(s) or Division(s):

- Storm Water Division of the Transportation &

Education is an important step in working towards improving receiving water quality both locally and regionally. By increasing public awareness and encouraging a change in both the attitude and the behavior of the general public and the regulated community, the City of San Diego (City) may reduce or eliminate storm water pollution caused by common daily activities.

Public participation also plays an important role in achieving the goals of the Jurisdictional Runoff Management Plan (JRMP). Involving the general public and school children in the City's JRMP-related programs help to improve storm water awareness among individuals and may lead to improved water quality. Collaboration between the City's Storm Water Division and the community helps foster a sense of shared responsibility in protecting water quality both locally and regionally. Community involvement also helps guide public education and participation planning. The City encourages public participation through the programs discussed in this section and modifies storm water education goals in response to community feedback. Annual telephone surveys and feedback from other programs discussed in this section are used to keep educational programs and activities current and relevant. Educational programs and activities are tailored to meet the needs of the following target audiences:

- Municipal departments and personnel
- Construction site managers
- Industrial and commercial owners and operators
- Residential community, general public, and school children

The goal of this section is to ensure education and outreach is being conducted to the City's targeted audiences in accordance with the Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit) and in accordance with the strategies described in the Water Quality Improvement Plans (WQIPs) for each of the Watershed Management Areas (WMAs) spanning the City's jurisdiction. Additionally, this section outlines the strategies, methods, and communication tools the City employs to encourage public participation, awareness, knowledge, and retention of storm water best management practices (BMPs) in an effort to improve overall water quality.

To meet the requirements of the Municipal Permit, the City has implemented an evolving training and public information and outreach plan utilizing a wide array of tools, tactics, and activities. The City's Public Education and Participation Program must meet the requirements of the Municipal Permit, as described in Table 9-1.

Table 9-1. Permit Requirements – Education

JRMP Section	Municipal Permit Section	Requirement (Summary)
9.2	E.7.a.(1)	Provide educational activities to reduce storm water pollutants associated with the application of pesticides, herbicides, fertilizers, and other pollutants of concern.
9.2	E.7.a.(3)	Provide education/training for target audiences.
9.2.6, 9.3.2	E.7.a.(2)	Provide educational activities to facilitate the proper management and disposal of used oil and toxic materials.
9.4	E.8., F.3.b.(3)	Track and submit data for Annual Report Forms, track and report estimated fiscal year budget expenditures.

The JRMP activities described throughout the remainder of this chapter fulfill the requirements of the Municipal Permit listed in Table 9-1. These JRMP activities are also summarized and included as strategies in each of the City's six WQIPs. Table 9-2 below identifies the applicable JRMP activities that have been identified as WQIP strategies. These strategies are also included in Appendix XX of the JRMP.

Table 9-2. JRMP Strategies Identified in the WQIPs

Strategy ID	Strategy
CSD-JRMP-03	Outreach to impacted industry regarding minimum BMP requirement updates.
CSD-JRMP-19	Outreach to property managers and trash haulers to elevate the emphasis of power washing as a pollutant source.
CSD-JRMP-33	Outreach to street sweeping enhancement-targeted areas.
CSD-JRMP-42	Implement a public education and participation program to promote and encourage development of programs, management practices, and behaviors that reduce the discharge of pollutants in storm water prioritized by high-risk behaviors, pollutants of concern, and target audiences.
CSD-JRMP-43	Continue implementation of a Pet Waste Program.
CSD-JRMP-44	Promote and encourage implementation of designated BMPs in commercial and industrial areas.
CSD-JRMP-47	Develop a targeted education and outreach program for homeowners with orchards or other agricultural land uses on their property.
CSD-JRMP-48	Enhance school and recreation-based education and outreach.
CSD-JRMP-49	Develop education and outreach to reduce irrigation runoff.
CSD-JRMP-52	Continue to promote and encourage implementation of Integrated Pest Management (IPM) for residents and businesses.

Additional strategies have been identified to help meet the water quality goals in the WQIPs; those strategies are identified in Section 9.5. These strategies will be managed by the Storm Water Division and are considered enhancements to the Public Education and Participation Program. The full list of WQIP strategies is included as Appendix XX of the JRMP.

9.2 Educational Outreach

This section describes the content, form, and frequency of education and outreach efforts for the City's target audiences. New development and construction target audiences as well as industrial, commercial, and municipal outreach programs are discussed briefly in this section and in detail in Sections 4.0 ("Development Planning"), 5.0 ("Construction"), 6.0 ("Industrial and Commercial"), and 7.0 ("Municipal"), respectively.

The City's successful education and outreach programs are founded on a carefully aligned set of communication goals that complement one another, yet recognize the varied

audiences, tools, and techniques to be considered in order to achieve meaningful changes in behavior.

Specific education and outreach goals and objectives identified by the City include:

- Identify diverse audiences and carefully target sustained communications through Community Based Social Marketing (CBSM).
- Ensure distribution of clear, concise and consistent information to target audiences.
- Foster cooperative approaches with the 18 municipalities in San Diego County, the County of San Diego, the San Diego County Regional Airport Authority, and the San Diego Unified Port District (collectively, "Copermittees") to ensure widespread distribution of consistent information.
- Cultivate an employee base that is knowledgeable about storm water pollution prevention issues and techniques and carries pollution prevention messages throughout their communities.
- Demonstrate a measurable increase in target audience knowledge and behavior of the target audiences regarding storm water pollution prevention.
- Foster widespread, comprehensive and long-term school-age education programming related to storm water pollution prevention.

9.2.1 Outreach Strategy

The Municipal Permit requires Copermittees to focus efforts on addressing the highest priority water quality conditions (HPWQCs) for each WMA, as established within the WQIP for each WMA. The City continues to adapt the focus of its residential outreach to target the greatest sources of pollutants contributing to the various HPWQCs within each of the six WMAs within the City's jurisdiction.

Since multiple jurisdictions lie within each WMA, a common mass media campaign is effective and beneficial for all San Diego Copermittees. The City of San Diego and other San Diego Copermittees continue to utilize a regional "Think Blue" outreach program as discussed in detail in this section. "Think Blue" provides a universal message and normative behavior reinforcement for all Copermittees.

The City and the Copermittees provide "Think Blue" with funding to develop, place and track overarching education, outreach, and advertising tools on behalf of the region. "Think Blue" defines priorities, target audiences and target pollutants each fiscal year. These elements are developed with input from a designated subcommittee that reviews "Think Blue" goals and objectives for the region as identified at the beginning of each fiscal year.

The City's "Think Blue" program continues to be active on three levels:

- Watershed – The City, along with other Copermittees, is responsible for implementing a minimum of two educational or outreach activities in each watershed.
- Regional – A joint public educational campaign where funds from all of the Copermittees are leveraged for broad based media buys and activities that benefit all Copermittees.
- Jurisdictional – The City and each Copermittee are responsible for conducting more localized outreach using regional "Think Blue" messaging to augment their individual jurisdictional campaigns.

The City employs CBSM practices in an effort to develop sustainable behavior change in target populations and audiences located in areas of the City that have significant levels of pollutants of concern in accordance with the Municipal Permit and the HPWQCs identified in the WQIPs for each WMA.

These BMP requirements for each target audience are promoted and presented through a variety of outreach tools and threaded into the City's CBSM pilot projects as appropriate. Special care is taken to contact hard-to-reach communities through alternative media, non-traditional outreach partnerships, and social organizations.

9.2.2 Websites

One method for conveying the City's outreach strategy is through use of websites. The City utilizes several websites to convey information to the public such as, but not limited to, water quality and watershed health, available programs and activities for various ages and interests, storm water regulations and explanations of code enforcement policies. The primary websites the City uses is the City's storm water home page, Think Blue website, and the regional Project Clean Water website.

The City's storm water home page (https://www.sandiego.gov/stormwater) is a resource for the public to learn about storm water, pollution prevention measures, pilot projects conducted by the City, storm water regulations and code enforcement. The City's Storm Water Standards Manual and sections of the City's Municipal code provide guidance on new and re-development projects and compliance at existing developments. The public may also report storm water pollution via the website by submitting a Storm Water Service Request. The website details other forms of reporting, such as, the Get It Done app, the hotline phone number and email.

The City's Think Blue website (https://www.sandiego.gov/thinkblue), which is accessible from the City's storm water home page as well as directly through www.thinkblue.org, is a central source information for public education and outreach opportunities. On these

pages the public may obtain event schedules, informational material, links to other resources, contact information, and news and/or events pertaining to the City's watersheds. More information on the Think Blue strategy is presented in Section 9.2.1.

The public may follow news regarding watershed health and water quality improvement efforts on the Project Clean Water (PCW) website (http://www.projectcleanwater.org/), which is accessible from the City's Think Blue website and the storm water home page. On PCW, the public can provide comment and recommendations to water quality improvement plans as drafts are released for review. See Section 9.3 for more information.

9.2.3 Municipal Staff Training

The Storm Water Division is responsible for developing and delivering general training to City employees to provide a guideline and promote awareness of storm water. Individual departments, particularly those with field crews that have more opportunity to cause a discharge into the municipal separate storm sewer system (MS4; hereafter, "storm drain system") are responsible for training their employees in the BMPs for protecting storm drains as well as proper cleanup of potential pollutants.

9.2.3.1 New Employees

The Storm Water Division is responsible for developing and providing all new employee trainings. New City staff receive a basic introduction to storm water issues at the "New Employee Orientation." Material covered in this introduction include, but are not limited to, the identification and reporting of illicit discharges and connections, urban runoff, and inadequate BMP implementation. Staff that do not participate in the "New Employee Orientation" (e.g. seasonal, part-time, etc.) receive general storm water training as part of their employee orientation from their respective department.

9.2.3.2 Municipal Activity-Specific Training

Departments that perform regular maintenance activities specifically identified in the Municipal Permit and/or perform work that can directly impact water quality create, execute, and fund activity-specific training sessions for their employees. These trainings must introduce work processes, functions, and behaviors that incorporate the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX) necessary for staff to prevent illicit discharges into the City's storm drain system. The City provides the most in-depth and frequent trainings to those employees and departments whose work has the most potential impact to storm water.

9.2.4 Construction Site Operators

Construction site operators can alter the landscape and natural flow of storm water runoff and generally create increased amounts of impervious surface. During such activities, construction site owners, developers, and employees could potentially discharge a number of different types of pollutants to receiving waters. It is important that this audience is

educated to ensure that BMPs are incorporated during the site design stage, throughout the construction process, and during the post-construction phase to reduce impacts from construction and development.

Activities that may be a high threat to receiving water quality include:

- Land clearing or alteration, resulting in higher erosion rate
- Exposed soil and material storage rock piles
- Earthwork, demolition, and generation of dust from construction traffic
- Other pollutants (e.g., waste and materials)

Potential impacts of activities include:

- Alteration of impervious area and natural drainage patterns
- Sedimentation of storm water runoff
- Pollutant transport
- Water degradation in receiving waters
- Degradation of aquatic and riparian ecosystems

Training, information materials and quarterly coordination meetings are provided to construction site operators, and other public audiences, regarding storm water pollution prevention measures and water quality requirements, as discussed in Section 5.7.3.

9.2.5 Industrial Facility Operators

Industrial sites include a wide range of businesses, including, but not limited to, manufacturing facilities, oil and gas facilities, hazardous waste treatment facilities, landfills, recycling facilities, transportation facilities, etc. Activities from industrial owners and operators can be a high threat to water quality due to the nature of the industry type. The City is committed to providing education to this audience to encourage the use of BMPs during day to day operations that may have the potential to contribute to pollutants in storm water runoff. Education is provided to industrial facility operators regarding storm water pollution prevention measures during routine BMP compliance inspections as needed.

9.2.6 Commercial Facility Operators

Commercial sites include a wide range of businesses including, but not limited to, restaurants, gas stations, automotive businesses, landscape maintenance service businesses, and mobile cleaning businesses. Activities associated with commercial business operations can pose a high threat to water quality due to the nature of the industry type. The City is committed to providing education to this audience to encourage

the use of BMPs during daily activities that may have the potential to contribute to pollutants in storm water runoff. Education is provided to commercial facility operators regarding storm water pollution prevention measures during routine BMP compliance inspections as needed.

9.2.7 Residential Community, General Public, and School Children

This subsection describes the ways Storm Water Division delivers its "Think Blue" messages to the public. Specific education and outreach activities offered by the various departments are included in their department's specific JRMP sections. For example, "Think Blue" messages can be found in bill inserts, information racks in community service centers, libraries, and the Office of the City Treasurer. Other departments assist by distributing storm water related messaging through mailings, newsletters, bill messaging, and at special events.

Outreach with traditional education and outreach tools is ongoing or implemented as needed based on the evolving CBSM strategy. These tools and materials may include the following.

"Think Blue" Program Logo and Slogan – The "Think Blue" logo and slogan ("A change for the better begins with you.") have been incorporated into the majority of outreach materials in an attempt to brand and legitimize the City's storm water program to the public.

Advertising – Well-placed advertising of "Think Blue" public service announcements (PSAs) is a critical part of the City's overall storm water program's outreach and education efforts. Forms of advertising include:

- Social media (e.g., Facebook, Instagram, etc.)
- Billboard space
- Radio drive-time
- News publications
- Air time on local network and cable stations
- Free time from cable, radio, TV network during prime time
- Sports events (Padres, Chargers, Aztecs)

New media including movie theater ads, pod casting, blogs, etc.

Web Page – The City's "Think Blue" website (https://www.sandiego.gov/thinkblue) provides a wide variety of storm water related information for all target audiences. The site provides a number of resources such as downloadable program brochures, fact sheets, reports, news, Project SWELL information, and information on the City's pilot projects.

Visitors to the site are able to view storm water television PSAs and the City's general storm water training video.

Hotline – The City's "Think Blue" Hotline number, available on the City's Think Blue website and Think Blue information materials, is available for residents to report storm water issues and/or pollution. Storm water issues and pollution can also be reported via the "Get It Done" web page and app. The mobile app makes it more convenient for people to report incidents when and where they see them, at any time of the day or day of the week. This is especially helpful for discharges that may occur outside of normal work hours, such as irrigation runoff.

Public Access Channels – The City's City TV 24 government access cable channel is a useful resource for the delivery of storm water messaging to the public. The station airs "Think Blue" PSAs and storm water hotline slides.

Special Events – Special events offer a wide variety of opportunities for the Education and Outreach Program to educate the public about storm water pollution. In collaboration with Regional Copermittees and the City's Office of Special Events, the Storm Water Division seeks out appropriate venues and community events to relay storm water pollution messages to the public. Such messages may include proper disposal of trash and liquids at events and general storm water messaging as appropriate. There may also be appropriate occasions for the program to sponsor its own events including Community Clean-up Days, household hazardous waste (HHW) and use oil collection events, Storm Drain Stenciling Days, and more.

Speakers Bureau – A variety of civic, volunteer, business groups and others hold periodic meetings that spotlight invited speakers.

Partnerships – Success in reaching diverse residents and businesses from throughout the City is accelerated by implementing cooperative support efforts among two or more organizations and groups. Such cooperative ventures expand the pool of individuals providing information and obtaining feedback, show that the issue is of significant importance, provide third-party credibility to the issue by involving others, and 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.

Groups that the Storm Water Division has worked with in the past include:

- Higher Education Institutions
- Environmental Organizations (San Diego Coastkeeper, San Diego River Park Foundation, I Love A Clean San Diego Inc, Wildcoast, Groundwork, etc.)
- Local School Districts/San Diego Unified Schools

- Construction Industry
- Business and Industry Groups
- Tourism
- Civic Associations
- Legislators

Collateral Materials – The City has developed a number of "Think Blue" related collateral materials and continues to update and create new pieces as needed. The City continues to create materials in alternative formats and languages, including English, Spanish, Vietnamese, Tagalog, and Chinese, as appropriate.

Collateral materials that will continue to be used include:

Fact Sheets – Information sheets provide bulleted, factual information about the overall storm water program or BMPs for specific activities. Fact sheets include minimum BMPs that are specific to residential, industrial/commercial, treatment control, and development practices that have the potential to generate pollutants, such as bacteria, trash, irrigation runoff, metals, nutrients, pesticides, herbicides, and fertilizers.

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 informational brochure continues to be a primary component in delivering general storm water pollution messages to the public. Each brochure is printed in English and Spanish (alternate formats upon request) and provides a concise call to action to residents and businesses to be mindful of storm water pollution and their impacts on water quality. "Think Blue" has produced a pollution prevention tips brochure, "3 C's (Control, Contain, Capture)" card, six watershed brochures, rebate brochures and sustainable landscapes brochures. The City, through its education, inspection, and enforcement personnel, has handed out thousands of these brochures to municipal employees, industrial and commercial businesses, and the general public.

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" website.

Informational Booklets – The City distributes informational booklets describing BMPs in an effort to provide information to specific business types that have potential for causing illicit discharges into storm drains. Pollutants addressed by these informational booklets include, but are not limited to, oil and grease, sediment, trash, and toxic materials.

Bill Inserts – The Storm Water Division utilizes the City's billing system as a mechanism to reach residents and licensed businesses to educate them on the Minimum BMPs for Residential, Industrial, Commercial, and Municipal Sites/Sources (Appendix IX). Storm water pollution prevention messages have been imprinted on water bills in collaboration with the Public Utilities Department, and storm water informational flyers are distributed with Business License renewals in collaboration with the Office of the City Treasurer. The City is exploring distribution of storm water messages through City billing as appropriate.

Promotional Items – Promotional items sponsored by the Storm Water Division provide reminders of the Program and key messages. The Storm Water Division has already developed a host of promotional items including "Scoop the Poop" pet waste bag dispensers, lawn signs and pencils, as well as, reusable bags and water bottles, absorbent towels, hand held buckets, pens and key chains that contain the "Think Blue" logo, hotline, and website. Additional promotional items are developed as appropriate.

9.2.7.1 School Children

Project SWELL – Outreach and education directed to school-aged is a long-term commitment for the City carried through Project SWELL (Stewardship, Water Education for Lifelong Leadership). Through the Project SWELL elementary school-based science curricula, the City educates San Diego Unified School District students in Kindergarten through 6th grade classrooms 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. Project SWELL reaches over 60,000 students per year. The program will continue to be updated to conform to curriculum standards and new information and technology as it becomes available.

Watershed and Pollution Prevention Education – In collaboration with I Love a Clean San Diego, "Think Blue" offers standards-based classroom presentations for middle and high school students within the City of San Diego. Watershed presentations teach students the importance of water quality protection and help students identify everyday actions they can take to keep their local watershed healthy. Students discuss watersheds, urban run-off, the water cycle, food webs, biomagnification, eutrophication and marine debris. The

watershed presentations reach over 3,000 students annually with pollution prevention information and demonstrations.

"Think Blue" Brigade – The "Think Blue" Brigade is a middle and high school environmental club within San Diego schools dedicated to the protection of San Diego's beaches, bays, and waterways through participation in pollution prevention events and projects - all while earning valuable community service hours. The "Think Blue" Brigade helps hundreds of students take action to prevent pollution.

9.2.7.2 Targeted Education

Based on the criteria described above and in accordance with the strategies listed in the applicable WQIPs, the City is targeting the following communities and high-risk activities.

Home Owners Associations

The City performs educational outreach and offers incentives to home owners associations (HOAs). The City continues to offer incentives to HOAs for adjusting property landscaping, irrigation systems, and maintenance activities to prevent non-storm water discharges from their properties and to utilize water-conservation techniques. BMP workshops are also conducted with property managers and maintenance personnel. City inspections of industrial and commercial properties have shown that the involvement of property managers/owners can be an efficient way to target a large audience since managers/owners often educate their tenants on the City's BMP requirements and may enforce the use of BMPs on the property.

Irrigation Runoff

Water meter reader personnel are trained to report illicit connections and illicit discharges (IC/IDs) and irrigation runoff issues as they come across such activities during their normal activities. Information collected in the field regarding instances of irrigation runoff is then communicated to Code Enforcement staff for appropriate follow-up actions.

Informational door hangers are left at residences and/or businesses noted to have irrigation runoff. The City is working to ensure these door hangers also provide specific information about storm water runoff, how pollutants can reach local waterways, the effects of these pollutants on the waterways, and the types of activities and materials that can pollute waterways.

The City continues to expand its public outreach on drought awareness that incorporates tips and information on reducing water use, especially through eliminating irrigation runoff and using drought tolerant landscaping. The City has partnered with the local water authorities to promote rebates to both residences and businesses for water conserving tools such as rain barrels, irrigation controllers, and artificial grass installation.

Individual Residential Car Washing

As discussed in Section 3.0 ("Illicit Discharge Detection and Elimination") of this JRMP, residents are required to implement the Minimum Residential BMPs, as feasible, and must minimize the amount of pollutants from entering the City's storm drain system, which includes City streets. Residents are encouraged to use professional car washes or implement BMPs at their homes to prevent water produced by residential car washing from entering the storm drain system. Incidents of individual residential car washing are typically identified during residential inspections and during the City's Dry Weather Major MS4 Outfall Discharge Monitoring Program. The City targets residential areas that continue to be a problem with additional educational materials and any necessary enforcement measures.

Mobile Businesses

The City provides information and outreach regarding storm water quality to mobile business owners and operators. Businesses are given educational materials outlining pollution prevention methods and other Minimum Industrial and Commercial BMPs related to their activities prior to the issue of a business license and during inspections.

Spanish-Speaking Population

The City targets the large Spanish-speaking population in the City by offering a number of educational brochures and handouts, including the letters distributed in response to observed discharges during dry weather MS4 outfall monitoring, in both English and Spanish.

9.3 Public Participation Programs

This section describes the steps taken, primarily by the Storm Water Division, to include public participation in the development and implementation of the City's JRMP, WQIPs, and additional activities related to public participation. Public participation efforts focus 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.

Public meetings are an integral part of a program's success. When new strategies, laws, plans, and projects are being pursued it is important to solicit the public's feedback in order to ensure it is successful.

Additionally, the City will continue to solicit feedback through focus groups and surveys. The program continues to receive feedback about proper BMP implementation and potential barriers, educational programs, street sweeping and other storm water services,

and general storm water pollution prevention knowledge (non-treatment, proper BMPs, etc.)

The City has chosen to pursue 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 Permit, as described in Table 9-3.

Table 9-3. Permit Requirements – Public Participation

JRMP Section	Municipal Permit Section	Requirement (Summary)
9.3	E.7.b.(1) (Pg. 110)	Provide a process for public participation in updating the HPWQCs, numeric goals, and water quality improvement strategies in the WQIPs.
9.3	E.7.b.(2) (Pg. 110)	Provide opportunities for the public to provide the City with recommendations for improving the effectiveness of the water quality improvement strategies implemented within its jurisdiction.
9.3	E.7.b.(3) (Pg. 110)	Provide opportunities for the public to participate in programs and/or activities that can result in the prevention or elimination IC/IDs.

9.3.1 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 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 are 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 Division and this JRMP to *"increase the knowledge and reduce the polluting behaviors of target audiences"*

- Assessing 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 resonate with key stakeholders and encourage behavioral changes
- Utilizing CBSM pilots to receive direct feedback from residents and businesses regarding 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 help shape and ultimately implement storm water pollution prevention activities and programs
- Providing measurements of program achievements through community input
- Utilizing the Storm Water Division Hotline (619-235-1000) and website (www.thinkblue.org and Get It Done, https://www.sandiego.gov/get-it-done) as information access points

9.3.2 Public Participation Strategies and Tactics

The City actively engages the public and target audiences in the development and implementation of the JRMP. The City makes presentations and receives input and feedback regarding the JRMP to the Public Utilities Advisory Committee (PUAC) meetings and the Natural Resources and Culture Council. The public has provided input for the JRMP through the California Environmental Quality Act process, during which a website was created specifically for review of the JRMP with a 30-day public comment period.

Additionally, the Storm Water Division regularly interacts with the public. The division has been called upon to provide testimony to the Natural Resources and Cultural Council. Staff is involved in the PUAC and its Storm Water Subcommittee in an effort to keep the public apprised of storm water issues and to receive public input. As needed, the City poses specific questions and brings significant issues forward to the committee for consideration.

Public participation is also provided through traditional outreach and education venues. As the issues surrounding storm water evolves, so too do the City's outreach methods. Tools available to the City of San Diego include the following.

Telephone Surveys – The City of San Diego conducts a baseline survey specifically related to storm water pollution prevention. This survey is conducted annually to measure attitudinal and behavioral changes.

Focus Groups – Focus groups are utilized as an excellent means of quickly obtaining useful input in testing the effectiveness and resonance of strategic communications messages.

Storm Water Hotlines – The Storm Water Division Hotline provides the public the opportunity to contact the City if someone witnesses an illicit discharge entering the storm drain system. The hotline is an invaluable asset in helping the Storm Water Division Code Enforcement Section cite and educate those residents and businesses that violate the City's Stormwater Management and Discharge Control Ordinance (Stormwater Ordinance). The City partners with the County of San Diego's Storm Water Hotline (1-888-846-0800) that allows County residents to call in illicit discharges. The City has also developed the Get It Done reporting tools, which allows people to report discharges via the City's website or via a mobile app.

Special Events – The City regularly sponsors and advertises special events such as Community Clean-up Days, HHW and used oil collection events, and more, which encourages the public participation. The City facilitates the proper disposal of used oil, toxic materials, and other HHW through education, providing public information, and providing dedicated collection centers through a partnership with the City's Environmental Services Department. Residents within the City of San Diego can recycle used oil and dispose of HHW, green waste, recyclables, and other materials at the City's HHW Transfer Facility at no charge. The City's website identifies the hours, location, and additional information on accepted and unaccepted waste. Appointments can be made on the website, and a phone number is available for questions.

Website and Social Media – The City's "Think Blue" website provides the public with the ability to offer comments and a variety of programs and initiatives regarding storm water issues. The website also provides information on how the public can become involved in the WQIP process. As a comprehensive information repository, the Storm Water Division website encourages public involvement by informing the public about the important issues associated with the Storm Water Program.

In addition to the website, the City also maintains "Think Blue San Diego" pages with Facebook and other social media websites, such as Instagram and YouTube. Online social media not only allows the City to engage the public in current storm water programs, events, and local issues, but also provides an interactive platform to gather input about community needs, concerns, and responsiveness to outreach efforts.

Stakeholder Interviews – The City meets with key local and regional stakeholders in an effort to create partnerships and trust. The City consults stakeholders about concerns, issues of interest, and opportunities for the improving the Program.

Speakers Bureau – The City formats its speakers' bureau engagements to allow time for audience questions. Questions are recorded and logged as appropriate to ensure the public issues are understood and will be potentially useful in helping to guide future outreach efforts.

Door-to-Door Canvassing – The City utilizes door to door canvassing to ensure residents in a particular area are receiving critical storm water related information, especially as it relates to potential construction issues. Providing one-on-one communication is useful in identifying issues particular to that geographic region.

Meetings, Hearings, Open Houses, and Workshops – The City hosts public meetings in an effort to provide the public with the opportunity to have it questions answered and its concerns acknowledged. The City continues to properly notify these meetings and provide times and locations that are convenient for the public to attend.

Partnerships – The City seeks out and coordinates initiatives and activities with well-established organizations in an effort to engage the public and encourage their support and participation. Examples of such groups include:

- Educational Institutions
- Environmental Groups
- Scouting Groups
- Construction Industry
- Business and Industry Groups
- Tourism
- Civic Associations
- Legislators

9.4 Annual Reporting

The Municipal Permit requires the City to report on its storm water activities annually. For fiscal year 2015, the JRMP annual report is due by October 31, 2015. Starting the following fiscal year, WQIP annual reports, which will include the JRMP annual report, are due by January 31 (e.g. The fiscal year 2016 report will be due on January 31, 2017.). At the beginning of each fiscal year, the Storm Water Division will provide updated internal annual reporting forms to each department or division to provide guidance on the expenditures and JRMP activities that must be tracked throughout the fiscal year. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses using the provided internal reporting forms and submit them to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff upon commencement of JRMP annual reporting coordination.

9.5 Additional Water Quality Improvement Plan Strategies for the Storm Water Division

In addition to the JRMP strategies described in the preceding sub-sections, the Storm Water Division has identified additional BMPs, or strategies, to achieve water quality improvement goals in affected WMAs. The City has developed these strategies and included them in the City's six watershed-based WQIPs, as required by Section B.3 of the Municipal Permit. The Storm Water Division is responsible for implementing the additional strategies listed in Table 9-4. More information about the specific strategies listed below is available in JRMP Appendix XX, which is a table listing all the strategies from the City's six WQIPs. The WQIP strategies are subject to change and are contingent upon annual budget approvals and funding availability, and they will be modified through the adaptive management process as needed.

Table 9-4. Additional Public Education and Participation Program WQIP Strategies

Strategy ID(s)	Strategy
CSD-JRMP-22*	Promote and encourage implementation of designated BMPs for residential and non-residential areas.
CSD-JRMP-45*	Expand outreach to homeowners' association (HOA) common lands and HOA incentives.
CSD-JRMP-46*	Develop an outreach and training program for property managers responsible for HOAs and maintenance districts.
CSD-JRMP-50*	Develop and distribute regional training materials for water-using mobile businesses.

Strategy ID(s)	Strategy
CSD-JRMP-51*	Enhance education and outreach based on results of effectiveness survey and changing regulatory requirements.
CSD-JRMP-53*	Improve consistency and content of websites to highlight enforceable conditions and reporting methods.
CSD-NS-11	Enhance and expand trash cleanups through community-based organizations involving target audiences.
CSD-NS-14	Develop a targeted education and outreach program for homeowners with orchards or other agricultural land uses on their property.

* *Enhanced JRMP Strategy*

10.0 Fiscal Analysis

10.1 Introduction

Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit) requires the City of San Diego (City) to secure the resources necessary to meet the requirements outlined in this Jurisdictional Runoff Management Plan (JRMP). The City is also responsible for reporting the JRMP fiscal analysis to the RWQCB each year. To satisfy this requirement, the Storm Water Division of the Transportation & Storm Water Department annually collects citywide financial information through the forms completed by each department and from within the Storm Water Division, analyzes the fiscal information, and reports the findings to the RWQCB.

The Municipal Permit also requires the municipalities in the San Diego Region to develop Water Quality Improvement Plans (WQIPs) for each Watershed Management Area (WMA). The City has jurisdiction in six of the eight WMAs in the San Diego Region and has collaborated with other jurisdictions to develop six WQIPs. Once the WQIP are approved, fiscal analysis data will be submitted to the RWQCB through the WQIP annual reporting process as later discussed in this section. During the period before the WQIPs are approved, referred to as the "transitional period" in the Municipal Permit, the City will submit its fiscal analysis data to the RWQCB via its JRMP annual reports. It is anticipated that the WQIPs will be approved during FY 2016 and that the first WQIP annual reports will be due in January 2017.

Table 10-1 below summarizes how the fiscal analysis component meets Permit requirements.

Table 10-1. Municipal Permit Requirements – Fiscal Analysis

JRMP Section	Municipal Permit Section	Requirement (Summary)
10.3	E.8.a	Each Copermittee must secure the resources necessary to meet all requirements of the Municipal Permit.
10.3[1]	E.8.b	Each Copermittee must conduct an annual fiscal analysis of its jurisdictional management program in its entirety.
10.3[1]	E.8.c-d.	Each Copermittee must submit a summary of the annual fiscal analysis with each WQIP Annual Report as required by the Municipal Permit, and provide documentation used to develop the summary upon request by the RWQCB.

[1] The JRMP describes the method used to develop the fiscal analyses required by these Permit sections. The actual analyses are performed each year as part of the City's annual reporting process.

10.2 Storm Water Municipal Permit Compliance Funding Needs

The City has developed projected funding needs that will be used to submit annual budget requests to secure the resources necessary to comply with the Municipal Permit. The categories presented below are defined differently from the terms used in the MS4, the WQIPs, and other Sections of the JRMP. These funding needs include four general categories:

1. **JRMP, Storm Water Division:** Storm Water Division funding needs to implement JRMP activities as required by Provision E in the Municipal Permit;[4]
2. **Flood Risk Management:** Storm Water Division funding needs for flood risk management programs associated with the JRMP, such as infrastructure repair and replacement;

[4] Some of the strategies within the "JRMP" section of the City's master WQIP strategy table (Appendix XX) are enhancements to provide additional water quality improvement beyond what had been provided via program implementation prior to the WQIPs. Enhanced catch basin cleaning and street sweeping programs proposed in targets areas of the City are examples of these types of strategies. The funding needs for "enhanced" JRMP strategies are not included in the JRMP funding needs category since the enhanced strategies go beyond the minimum requirements of Provision E of the Permit. Since the enhancements have been designed to help achieve WQIP goals, the costs of enhanced JRMP strategies are included within the WQIP category of funding needs.

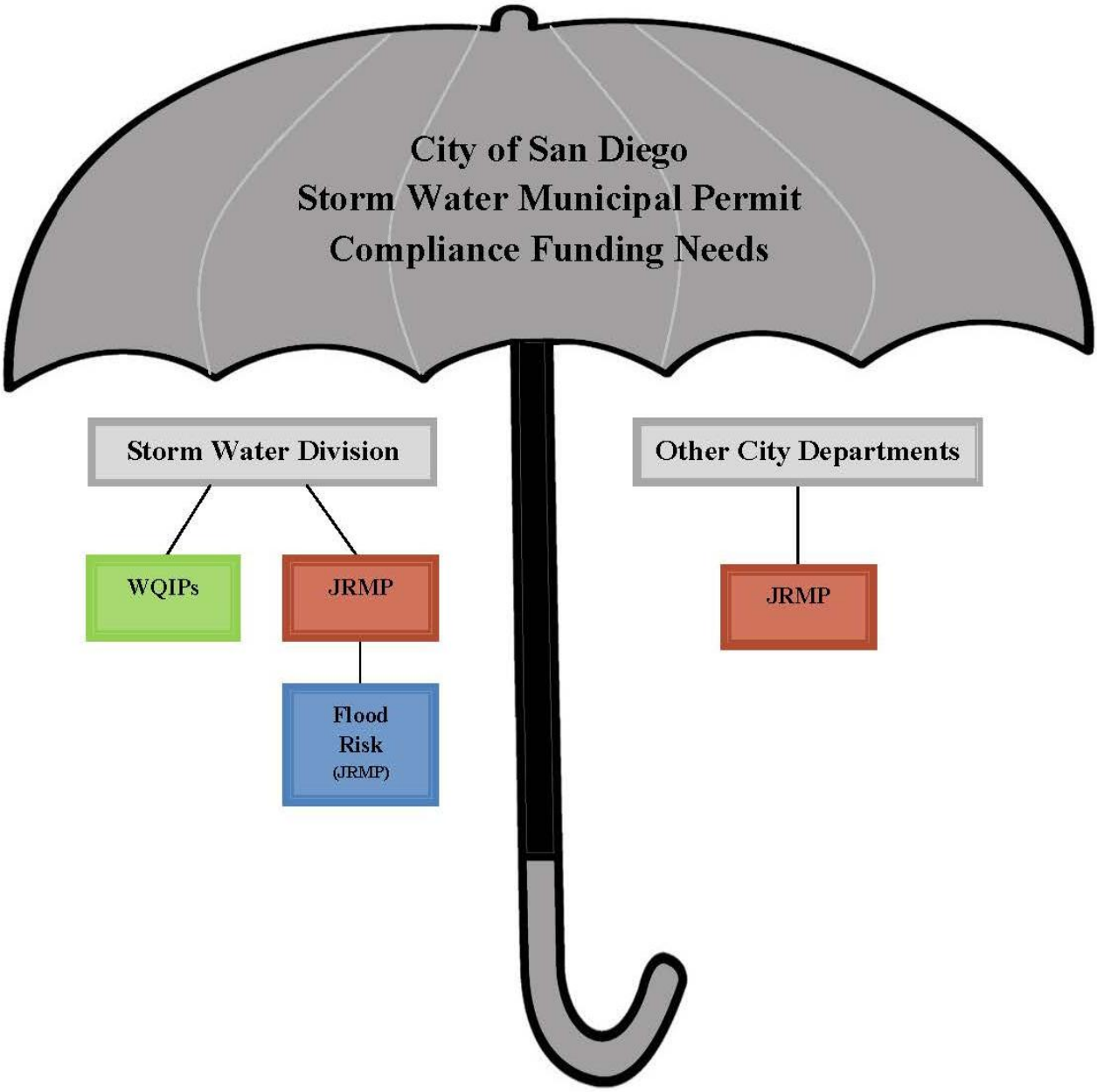
3. **WQIP:** Storm Water Division funding needs for activities managed by the Storm Water Division to meet the goals identified in each of the City's six WQIPs; and
4. **JRMP, Other Departments and Divisions:** Funding needs for City departments and divisions other than the Storm Water Division to implement JRMP activities, as required by the Municipal Permit. Examples of JRMP activities include administration, training, and best management practice (BMP) implementation.

Figure 10-1 shows the relationship of the City's funding needs, as described above, to comply with the Municipal Permit. The Storm Water Division's water quality compliance funding needs, which represent the first three categories above and the left side of Figure 10-1, are included in this document to provide a full picture of the resources the Storm Water Division will need to comply with the Municipal Permit over the next 20 years. The Storm Water Division's funding needs are presented for the next 20 years to align with the schedules in the WQIPs, which are described in more detail in the following section. The source of the funding needs is the Storm Water Division's 2015 Watershed Asset Management Plan (WAMP) Cost Update, which is available on the Storm Water Division's website[5]. The WAMP is the Storm Water Division's long-range planning document used to manage the storm water assets it owns and operates to improve water quality and mitigate flood risk. The 2015 WAMP funding needs estimate reflect the Division's anticipated funding needs in 2015, and will be updated as needed, to reflect current and refined funding needs based on new information, potential changes to water quality regulations, and/or operational/programmatic changes. Updates to the WAMP may be posted to the Storm Water Division's website when needed. The most recent version of the WAMP posted on the website, if more recent than provided in the JRMP, supersedes the funding need estimates provided in the JRMP.

Citywide funding needs to implement JRMP activities for non-Storm Water Division departments and divisions (category four above and the right side of Figure 10-1) are also presented in this section to illustrate the full resources the City will need to comply with the Municipal Permit. These funding needs are presented for the next four fiscal years to coincide with the remainder of the current Municipal Permit term (FY 2016 – FY 2018) plus one additional year. Categories one, two, and three do not apply to non- Storm Water Division departments and divisions.

[5] http://www.sandiego.gov/stormwater/plansreports/

Figure 10-1. Relationships among Municipal Permit Compliance Funding Needs



10.2.1 Storm Water Division Municipal Permit Compliance 20-Year Funding Needs

Note: *Estimates of funding needs presented in this section were based on the best information available at the time they were prepared. As program implementation progresses, updates to estimated funding needs are likely to change. For the most recent estimate of funding needs, refer to the WAMP available at the Storm Water Division website, www.sandiego.gov/stormwater/plansreports.*

Funding needs for the Storm Water Division to implement its JRMP activities, flood risk management programs, and WQIP activities for the next 20 years are summarized in Table 10-2. The summaries distinguish between costs associated with City Capital Improvement Projects (CIPs), which is a separate funding source, and other program costs that are funded through the General Fund.

Each of the City's six WQIPs has a distinct schedule for achieving the applicable final goal(s), as shown below:

- San Diego River WMA: FY 2031
- San Diego Bay WMA: FY 2031
- Peñasquitos WMA: FY 2035
- San Dieguito WMA: FY 2031
- Mission Bay WMA: FY 2031
- Tijuana River WMA: FY 2028

For most watersheds, the year the final goal(s) will be achieved aligns with existing Total Maximum Daily Loads (TMDL) and Area of Special Biological Significance (ASBS) compliance schedules.

The cost projections in Table 10-2 are presented from FY 2016 through FY 2035 to show the period from the date the JRMP will begin implementation (FY 2016) to the date of the latest final goal to be attained as described in the City's six WQIPs (FY 2035). To maintain comparability among WQIP projected costs for different watersheds, where a WQIP final goal is projected to be attained before FY 2035, ongoing operation and maintenance costs to maintain compliance in that watershed after final goal attainment were projected from the year of the final goal through FY 2035.

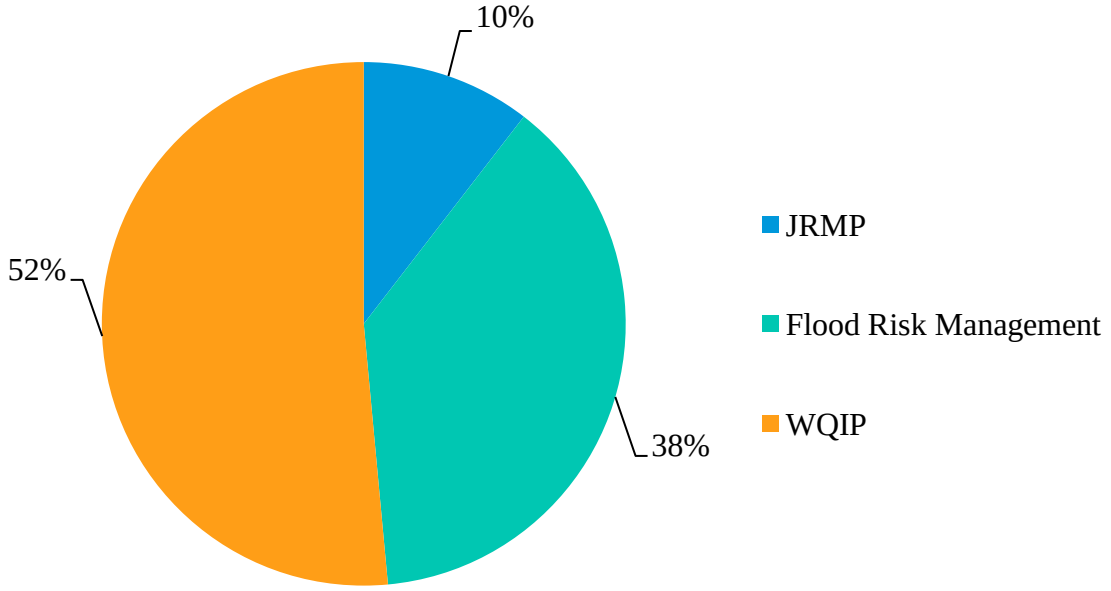
Figure 10-2 shows the share of total projected Storm Water Division funding needs for JRMP activities, flood risk management programs, and WQIP activities for the 20- year compliance period (FY 2016 – FY 2035). As discussed in the previous section, funding needs were derived from the Storm Water Division's 2015 WAMP Cost Update. Note that the

projected funding needs are based on achieving compliance with existing requirements. If other, additional requirements go into effect in the future, projected funding needs may change.

Table 10-2. Storm Water Division Municipal Permit Compliance Funding Needs, FY 2016-FY 2035

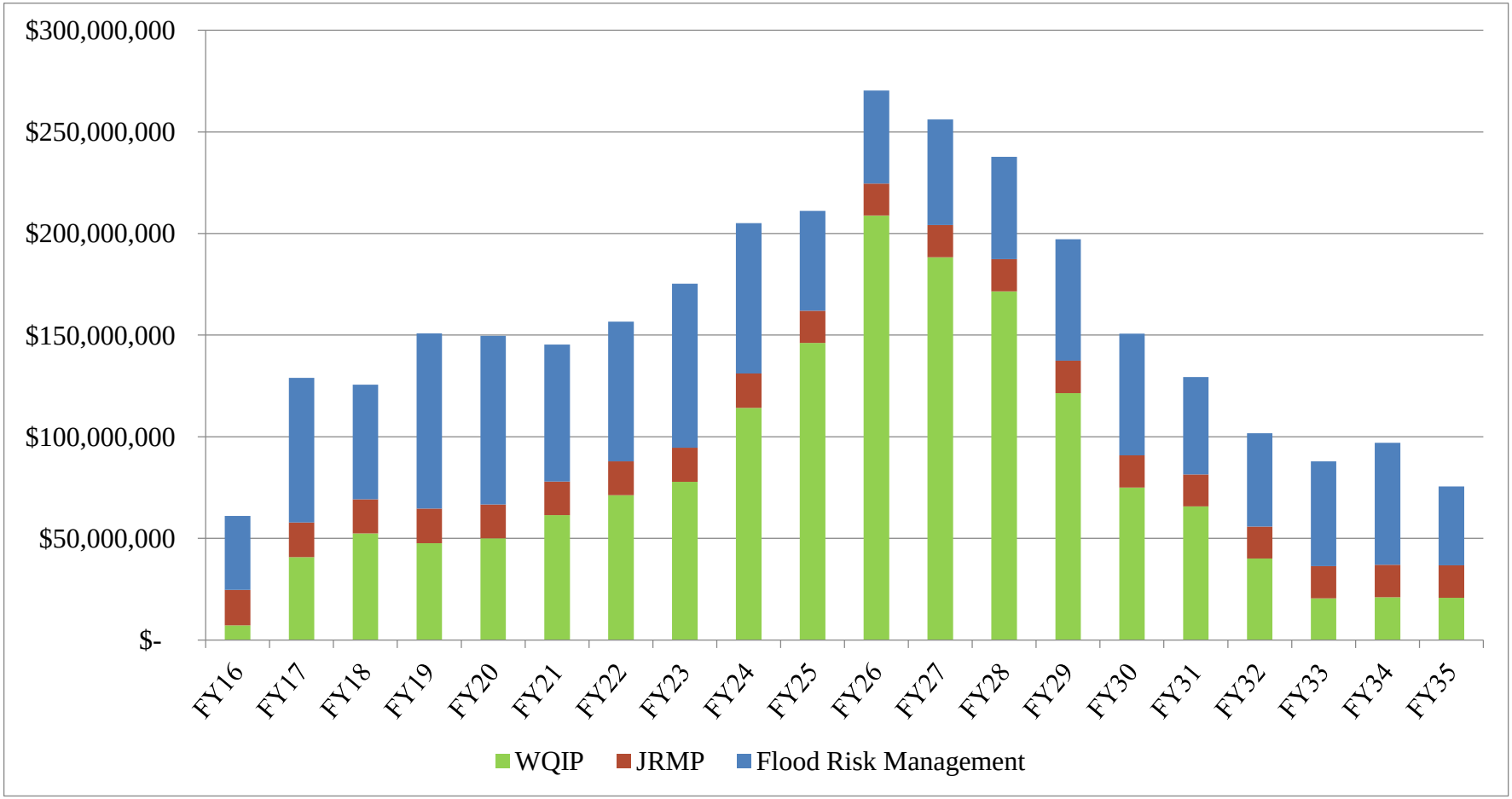
Budget Category	CIP	General Fund	Total
JRMP	-	$325,950,098	$325,950,098
Flood Risk Management	$557,652,626	$627,155,834	$1,184,808,460
WQIPs			
San Dieguito	*$446,332*	*$6,371,611*	*$6,817,943*
Peñasquitos	*$969,161,878*	*$137,707,179*	*$1,106,869,057*
Mission Bay	*$26,114,687*	*$12,494,901*	*$38,609,588*
San Diego River	*$231,308,861*	*$32,078,145*	*$263,387,006*
San Diego Bay	*$129,782,660*	*$45,551,046*	*$175,333,706*
Tijuana River	-	*$11,252,592*	*$11,252,592*
WQIP Subtotal	$1,357,094,779	$245,455,474	$1,602,550,253
Totals	**$1,914,747,405**	**$1,198,561,406**	**$3,113,308,811**

Figure 10-2. Proportional Shares of Storm Water Division Funding Needs, FY 2016-FY 2035



The Storm Water Division has also identified its annual funding needs over the 20-year compliance period (FY 2016 – FY 2035) and it is included as Appendix XXII. Figure 10-3 illustrates the anticipated funding needs from year to year for the Storm Water Division to implement its JRMP activities, flood risk management programs, and WQIP activities. Figure 10-4 shows the projected General Fund and CIP costs for each of these years, and figures 10-5 and 10-6 show more detailed breakdowns of the CIP and General Fund costs, respectively.

Figure 10-3. Storm Water Division Annual Funding Needs, FY 2016-FY 2035



Note: WQIP costs include the cost of construction CIPs, but not the cost of ongoing operation and maintenance after construction is complete. The ongoing operation and maintenance costs are instead captured in the JRMP and Flood Risk Management categories.

Figure 10-4. Storm Water Division Annual General Fund and CIP Funding Needs, FY 2016-FY 2035

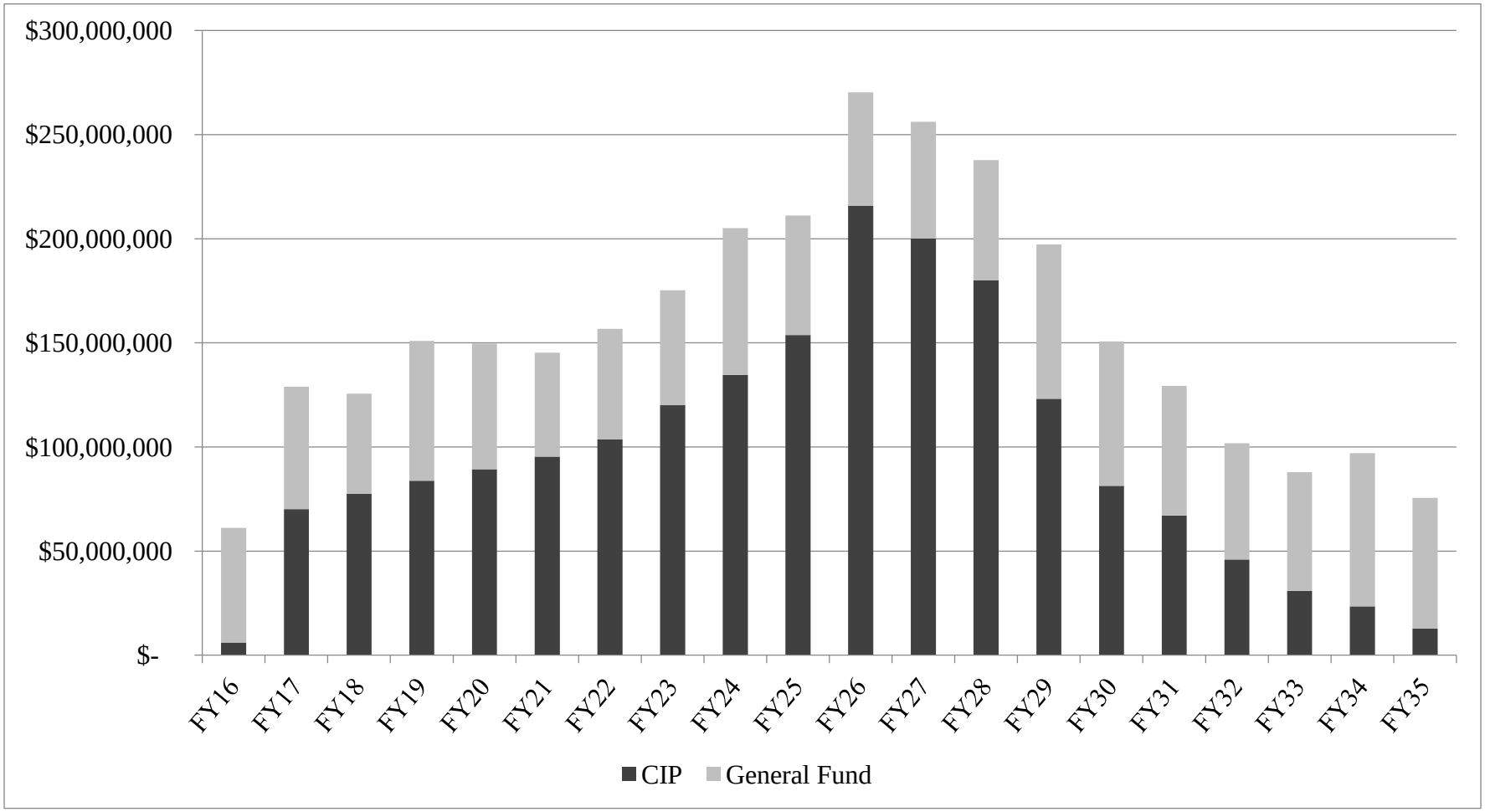


Figure 10-5. Storm Water Division Annual CIP Funding Needs, FY 2016-FY 2035

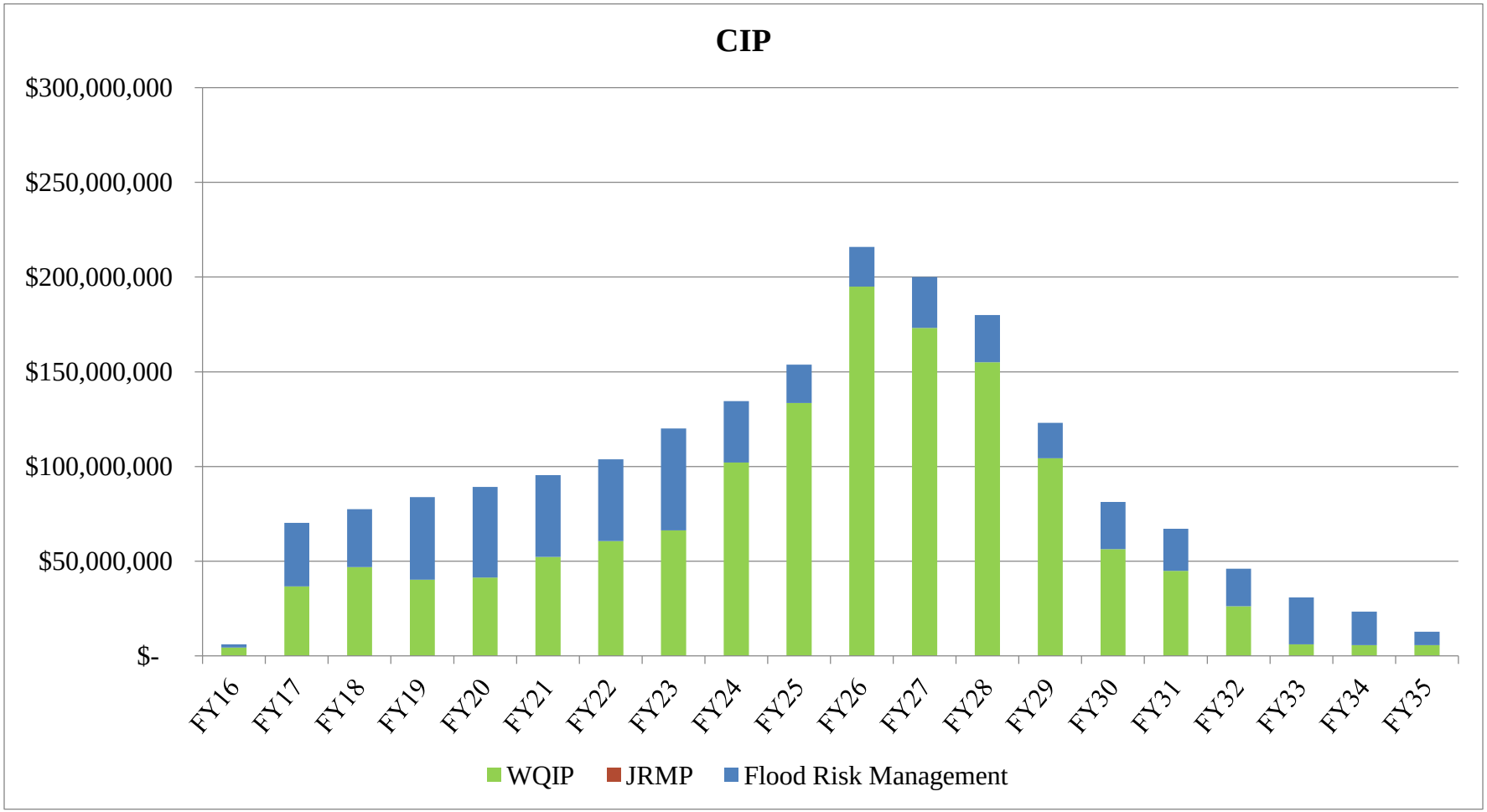
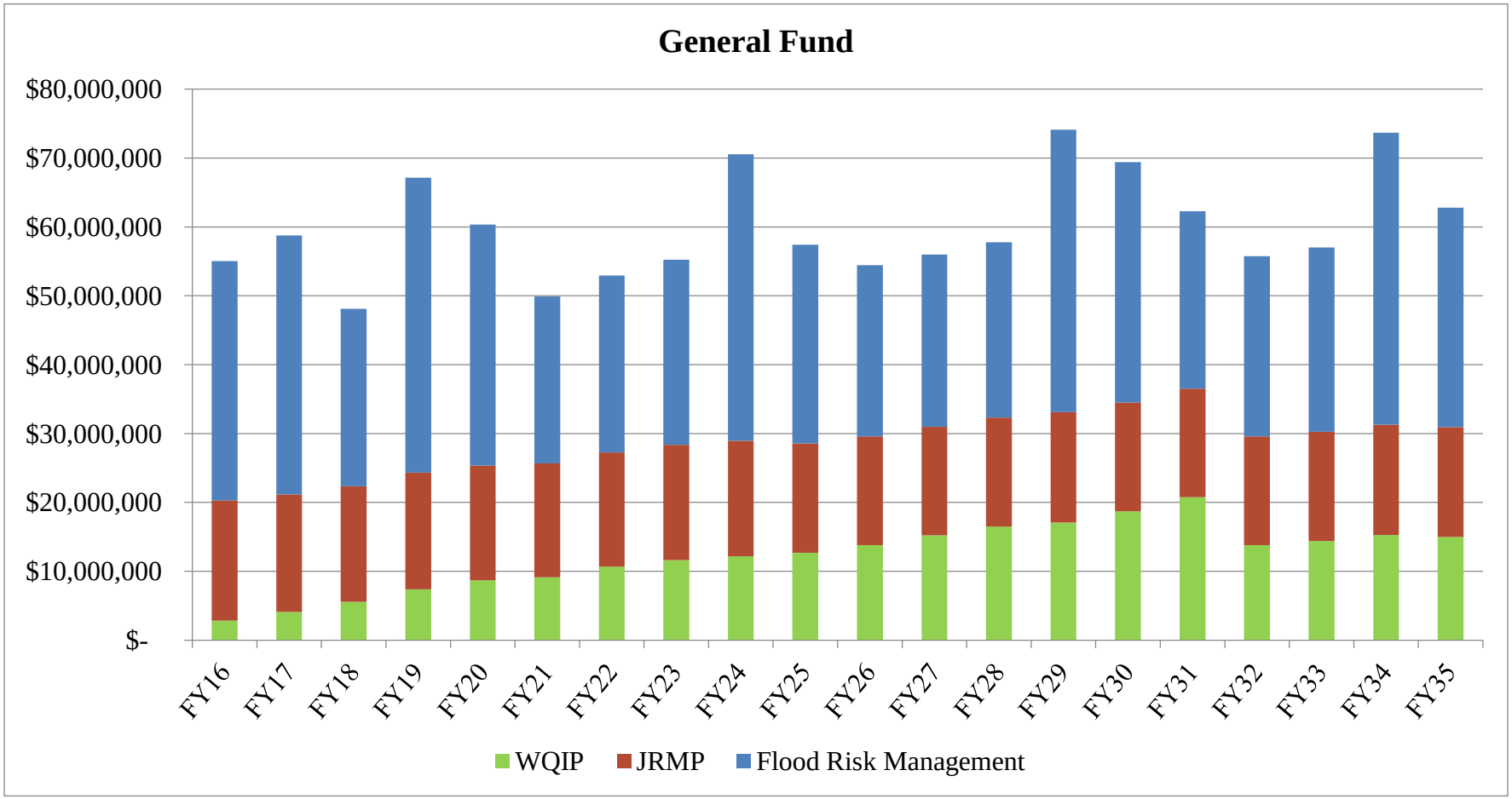


Figure 10-6. Storm Water Division Annual General Fund Funding Needs, FY 2016-FY 2035



10.2.1.1 Storm Water Division Funding Sources

Funding for Municipal Permit-required activities undertaken by the Storm Water Division comes primarily from the City's General Fund, supplemented by approximately $6 million in revenue from the City's Storm Drain Fund. Bonds are used to finance Storm Water Division CIPs, as necessary, and are repaid by the General 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.

General Fund

The General Fund is the main fund for the City, and is supported by major revenue sources including property tax, sales tax, transient occupancy tax, and franchise fees. The General Fund is used to provide core community services.

Bonds

Funding for Storm Water Division CIPs comes primarily from bonds financed through SANDAG's TransNet program.

Other Funding Sources

The Storm Water Division pursues grant funding for storm water projects, where available. Grant funding can be a useful supplementary mechanism to pay for structural improvements, such as green infrastructure. It is also possible that public-private partnerships may provide a funding source for storm water programs or projects in the future.

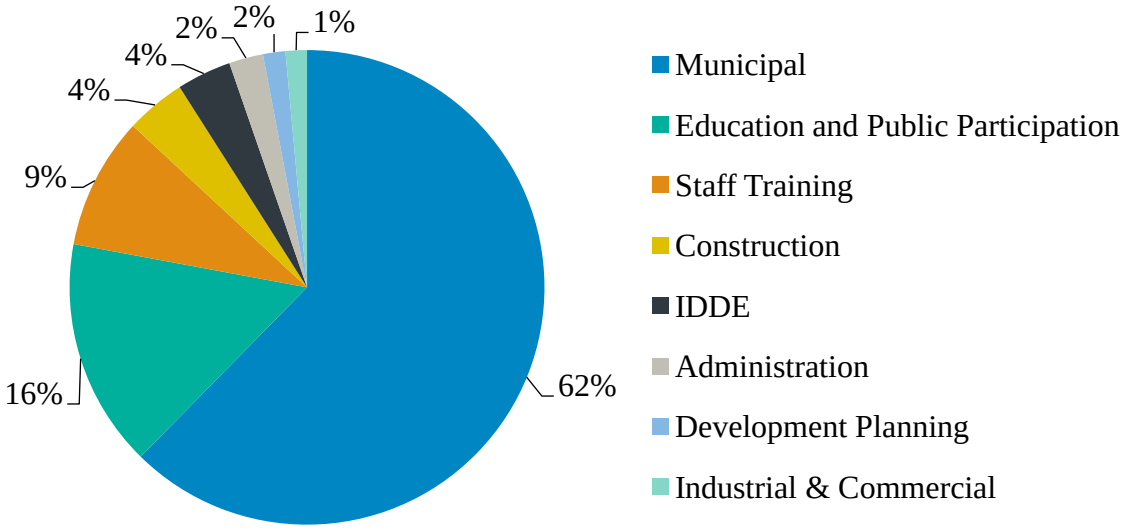
10.2.2 Non-Storm Water Division Citywide JRMP Implementation Funding Needs FY 2016 – FY 2019

City departments and divisions other than the Storm Water Division prepared funding needs to implement their JRMP activities for the next four fiscal years (Table 10-3 and Figure 10-7). Four-year cost projections are provided to coincide with the remainder of the current Municipal Permit term (FY 2016 – FY 2018) plus one additional year. The cost projections include, but are not limited to, administration, training, and best management practice (BMP) implementation by non-Storm Water Division departments and divisions. The cost projections do not include costs for the Engineering Branch of the Public Works Department because storm water costs for CIPs are difficult to forecast accurately several years out into the future due to annual changes in CIP needs. Flood risk management programs and WQIP activities do not apply to non-Storm Water Division departments and divisions; therefore, those funding needs are not included in Table 10-3.

Table 10-3. Non-Storm Water Division Citywide JRMP Implementation Funding Needs, FY 2016-FY 2019

Budget Category	FY 2016	FY 2017	FY 2018	FY 2019	Totals
Non-Storm Water Division Citywide costs	$3,631,936	$3,807,987	$3,991,003	$4,182,737	$15,613,664

Figure 10-7. Non-Storm Water Division Citywide JRMP Implementation Funding Needs by Storm Water Program Component, FY 2016-FY 2019



Note: costs for the Engineering Branch of the Public Works Department are not included in this figure because of difficulty in forecasting storm water CIP costs through FY 2019 due to annual changes in CIP.

10.2.2.1 Non-Storm Water Division Citywide Funding Sources for JRMP Implementation

Citywide implementation of Municipal Permit requirements by departments and divisions other than the Storm Water Division is funded through four main types of governmental funds: the General Fund, Special Revenue Funds, Enterprise Funds, and Internal Service Funds. Additional information about these categories of funding sources is provided below.

General Fund

The General Fund is the main fund for the City, and is supported by major revenue sources including property tax, sales tax, transient occupancy tax, and franchise fees. Departments funded by the General Fund provide core community services.

Special Revenue Funds
Special Revenue Funds account for revenues received for specifically identified purposes. Some of the larger funds that fall under this category include Transnet, Gas Tax and Special Promotion programs.

Enterprise Funds
Enterprise Funds are initiated for specific purposes and funded through fees for services. This funding type is designated for the operations, management, maintenance, and development of the department providing the service. For implementation of Citywide JRMP activities, activities are funded through the following enterprise funds:

- Airports Fund
- Development Services Enterprise Fund
- Golf Course Enterprise Fund
- Recycling Fund
- Refuse Disposal Fund
- Sewer Revenue Funds
- Water Utility Fund

Internal Service Funds
Internal Service Funds are comprised of fees for services provided by one City department to another City department or division. For implementation of Citywide JRMP activities, activities are funded through the following internal service funds:

- Engineering and Capital Projects Fund
- Equipment Division Funds

Other Funding Sources
The City of San Diego pursues grant funding a variety of projects, some of which may help the City comply with storm water requirements. For example, water conservation grant funding may be used to reduce landscape irrigation, which typically helps reduce irrigation runoff to the municipal separate storm sewer system.

10.2.3 Annual Reporting

The City has developed a long-term analysis of estimated budget requirements. This exercise has been completed to allow the City to plan for securing the resources necessary to meet the requirements of the Municipal Permit and to provide important services to City residents, such as flood risk management. Actual amounts budgeted for each year will be set through the City's budgeting process. As part of the required annual reporting process each year, the City will prepare a summary of expenditures from the reporting period and a

list of funding sources for both the current and upcoming fiscal years. The list of funding sources will identify legal restrictions that apply to proposed funding sources where applicable. For example, for the annual report covering FY 2017, the City will report the estimated expenditures for implementing the storm water program in FY 2017 and the funding sources for program costs for both FY 2017 and FY 2018.

Information necessary to complete the fiscal analysis each year will be collected from each responsible department or division. At the beginning of each fiscal year, each municipal department tracks their expenditures for implementing JRMP activities. To allow the Storm Water Division sufficient time to complete the annual report, each department or division will summarize its JRMP-related activities and expenses in an internal reporting form and submit it to the Storm Water Division by the City's established internal data collection deadline. This internal deadline will be determined by Storm Water Division staff each year upon commencement of JRMP annual reporting coordination.

The City will report its fiscal analysis information in its JRMP annual reports until the RWQCB approves the WQIPs. The deadline for JRMP annual report submittal during the transitional period is October 31 following the end of the fiscal year. For example, FY 2015 ends on July 1, 2015, and the FY 2015 JRMP annual report is due to the RWQCB on October 31, 2015. After the WQIPs are approved, the JRMP annual report forms and fiscal analysis data will not be provided directly to the RWQCB on their own. Instead, they will be included as part of the WQIP annual reports. The City's fiscal analysis data will be included in the WQIP annual report for each of the six WQIPs to which the City is a party. The WQIP annual reports for each reporting period are due January 31 of the following year. For example, the FY 2018 WQIP annual reports will be due on January 31, 2019. It is anticipated that the WQIPs will be approved during FY 2016 and that the first WQIP annual reports will be due in January 2017.

11.0 Conclusions and Recommendations

Based on experience gained through implementing programs as required by the previous Regional Water Quality Control Board, San Diego Region (RWQCB) Order No. R9-2007-0001, the City of San Diego (City) has updated its Jurisdictional Runoff Management Plan (JRMP) to both improve upon storm water programs in the City and to meet the requirements of the RWQCB Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit). Under the Municipal Permit, the City has also designed a number of new programs. The City anticipates assessing and refining these new programs as well as continuing to assess and improve existing ones so that the City's storm water program is implemented as efficiently as possible. Continually working to improve existing programs and implementing additional programs may be effective in reducing or eliminating polluted runoff from the variety of areas and activities discussed throughout the JRMP. The City will continue to work with other 17 municipalities in San Diego County, the County of San Diego, the San Diego County Regional Airport Authority, and the San Diego Unified Port District to develop methods to foster and assess long-term success in regional water quality improvement.

12.0 References

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