

**CII Subcommittee Agenda
December 11, 2008
- 1:00 to 2:30 p.m.
Millbrae Community Center Conference Room
477 Lincoln Circle - Millbrae**

- | | | |
|-----|--|---|
| 1. | Introductions, Announcements, Changes to Agenda, Approve October Meeting Summary - 5 min. | <i>Ward Donnelly</i> |
| 2. | Update on TAC and Any Other Matters That Affect CII Not Covered Elsewhere - 5 min. <i>OUTCOME: Obtain information.</i> | <i>Matt Fabry</i> |
| 3. | Update on Pollution Prevention Group's Activities – 10 min. <i>OUTCOME: Obtain update.</i> | <i>Whomever</i> |
| 4. | Update from Regional Water Board – 15 min. <i>OUTCOME: Obtain information from Regional Water Board staff about issues needing inspectors' attention.</i> | <i>Cecil Felix</i> |
| 5. | Discuss Inspection Reporting for Municipal Regional Stormwater Permit Reporting – 10 min. <i>OUTCOME: Obtain information and provide input, as needed</i> | <i>Fred Jarvis/ Everyone</i> |
| 6. | ACCWP's Efforts to Better Control Discharges from Mobile Food Processing Units – 10 min. <i>OUTCOME: Obtain information and discuss its potential applicability to San Mateo.</i> | <i>Fred Jarvis/ Dermot Casey/ Everyone</i> |
| 7. | Training Work Group Projects – 10 min. <i>OUTCOME: Obtain update on projects.</i> | <i>Fred/ Dermot Casey/ Work Group Members/ Everyone</i> |
| 8. | Share Information on Illicit Discharge and Industrial/Commercial Inspection Problems – 15 min. <i>OUTCOME: Identify common problems and gain information on successful ways to resolve them.</i> | <i>everyone</i> |
| 9. | Consider Moving CII Meeting Date to Third Thursdays – 5 min. <i>OUTCOME: Agree on whether to move the meeting dates to avoid possible conflicts with WAM meetings.</i> | <i>Ward/ Everyone</i> |
| 10. | Agree on Next Meeting Date of February 19 and Topics – 5 min. | <i>everyone</i> |

DRAFT CII Subcommittee Report

Meeting Date: October 9, 2008

Subcommittee Action:

1. Agreed to submit comments by October 23 on the draft Compliance Program, which describes how to achieve compliance using incentives and disincentives. The one-page Enforcement Response Plan will be part of the Compliance Program.
2. Agreed to conduct training of the approximately ten new business inspectors once the municipal regional stormwater permit has been adopted. There is interest in conducting the training at an actual business or corporation yard, and CII Subcommittee members are encouraged to suggest possible training locations. Planning for this training workshop should start about six months prior to the actual training, which may occur in late spring or summer.

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

Other Information/Announcements:

- **MRP.** BASMAA is continuing to try to offer suggestions to the Water Board staff on some portions of the draft permit. SCVURPPP staff is trying to identify an option for doing the business inspection, illicit discharge, and construction reporting, and SMCWPPP's forms and annual evaluation methods have been provided to SCVURPPP as examples. In addition, there continues to be interest by BASMAA's member agencies on developing trash and litter control permit language. BASMAA has a work group that is evaluating options to offer the Water Board staff.
- **Bay Area Pollution Prevention Group (BAPPG).** Burlingame participated in BAPPG's thermometer exchange with 33 people attending an event on Sunday in the library. Some of the participants came from neighboring cities. Daly City had 11 people participate in its thermometer exchange. A press conference was held at the Palo Alto Baylands to call attention to the state-wide October 4-11th *No Drugs Down the Drain Week*.
- **Regional Water Board's Recent Enforcement Efforts.** The Regional Water Board staff continues to collect administrative civil liabilities (ACLs) from Industrial General Permittees who have submitted late annual reports. The Regional Water Board staff believes that late reports are symptomatic of other compliance problems, and collecting fines is relatively straight forward. There are also several proposed ACLs for overflows from sanitary sewer collection systems, including a couple in San Mateo County. The Regional Water Board with help from the State Water Resources Control Board filed a notice of its intent to sue the U.S. Maritime Administration for the continued paint exfoliation (with heavy metals and PCBs) from a number of highly deteriorated ships located in Suisun Bay.
- **Carpet Cleaners.** Sometimes carpet cleaners discharge carpet cleaning wastewaters to vegetation when they are unable to go back to their office and dispose of this water to the sanitary sewer. The size of the vegetated area may be too small for the 100 gallons or so of wastewater that may be discharged.
- **Caltrans Coordination.** Caltrans was concerned about overwatering runoff. Caltrans and local inspection staff visited the property owner to encourage proper watering. Caltrans collected a 2-liter sample of the runoff for testing, and it views overwatering as an illicit discharge.

Subcommittee Work That Affects Other Subcommittees: Any work that affects the development of a Compliance Program with an Enforcement Response Plan (ERP) should be of interest to the New Development Subcommittee and construction inspectors.

Next Steps: Training Work Group will continue working on the Compliance Program and ERP.

Next Meeting Date: Subcommittee will meet on December 11, 2008 at 1:00 pm.

CII Subcommittee Attendance – 2008/09

| Name | Agency | PHONE | FAX No. | E-Mail | Aug. | Oct. | Dec | Feb | April | June |
|---------------------------------|------------------------|----------------------|--------------|--|------|------|-----|-----|-------|------|
| | City of Atherton | | | | | | | | | |
| Bozhena Palatnik Gilbert Yau | City of Belmont | 659 593-7463 | | Bpalatnik@Belmont.gov | √ | √ | | | | |
| Matt Fabry | City of Brisbane | 415 508-2134 | 415 467-5547 | mfabry@ci.brisbane.ca. | | | | | | |
| Eva Justimbaste | City of Burlingame | 342-3727 | 342-3712 | eva.justimbaste@veoliawaterna.com | √ | √ | | | | |
| Muneer Ahmed | City of Colma | 757-8888 | 757-8890 | Muneer.ahmed@colma.ca.us | | | | | | |
| Ward Donnelly | City of Daly City | 991-8208 | 991-8220 | wdonnelly@dalcity.org | √ | √ | | | | |
| Cynthia Royer | City of Daly City | 991-8203 | 991-8220 | Croyer@dalcity.org | | | | | | |
| John Latu | City of East Palo | 853-3165 | | jlatu@cityofepa.org | | | | | | |
| Norm Dorais | City of Foster City | 286-3279 | 349-7204 | ndorais@fostercity.org | | | | | | |
| Gary Whelen/ Tom Jahns | City of Half Moon | 726-88260 | | | | | | | | |
| Jen Chen | Town of Hillsborough | | | | | | | | | |
| John Simonetti | City of Menlo Park | 321-0384 | 321-4265 | | | | | | | |
| Virginia Parks/ Jennifer Ng | City of Menlo Park | 330-6752 330-6743 | | vkfparks@menlopark.org | √ | | | | | |
| Catherine Allin | City of Millbrae | 259-2470 | 259-2398 | callin@ci.millbrae.ca.us | √ | | | | | |
| David Ocampo | City of Millbrae | 259-2392 | 259-2398 | docampo@ci.millbrae.ca.us | | | | | | |
| Kevin Cesar | City of Millbrae | 222-0545 | | | | √ | | | | |
| Raymund Donguines | City of Pacifica | 738-3767 | 738-3003 | donguinesr@ci.pacifica.ca.us | √ | | | | | |
| | Town of Portola Valley | | | | | | | | | |
| Gary Lepori | City of Redwood | 780-7472 | | glepori@redwoodcity.org | | | | | | |
| Ray Bartolo | City of Redwood | | | rbartolo@redwoodcity.org | | | | | | |
| Gino Quinn | City of San Bruno | | | | | | | | | |
| | City of San Carlos | | | | | | | | | |
| Vern Bessey | City of San Mateo | 522-7342 | 522-7351 | vbessey@cityofsanmateo.org | | | | | | |
| Alan Atwater | City of San Mateo | 522-7343 | 522-7351 | AAAtwater@cityofsanmateo.org | | √ | | | | |
| Rob Lecel | City of San Mateo | 522-7344 | 522-7351 | RLecel@cityofsanmateo.org | | √ | | | | |
| | City of So. San | | | | | | | | | |
| Cassie Prudhel | City of So. San Fran | 829-3840 | 829-3855 | Cassie.prudhel@ssf.net | | | | | | |
| | Town of Woodside | | | | | | | | | |
| Dermot Casey | County of San Mateo | 363-4957 | 363-7337 | djcasey@co.sanmateo.ca.us | √ | √ | | | | |
| Matt Fabry | SMCWPPP Coordinator | 415 508-2134 | 415 467-5547 | mfabry@ci.brisbane.ca. | √ | | | | | |
| Michael Li | SBSA | 594-8411 Ext. 139 | 591-7122 | mli@sbsa.org | √ | √ | | | | |
| Norm Domingo | SBSA | 650 594-8411 | | ndomingo@sbsa.com | | | | | | |
| Habte Kifle | Water Board | 510 622-2371 | | hk@waterboards.ca.gov | | | | | | |
| Cecil Felix | Water Board | 510 622-2343 | | CFelix@waterboards.ca.gov | √ | | | | | |
| Fred Jarvis | EOA, Inc. | 510 832-2852 | 510 832-2856 | Fejarvis@eoainc.com | √ | √ | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| No. Attending | | | | | 11 | 9 | | | | |

Industrial and Commercial Business Inspection Data

| Information Collected | Detailed Records in Co-permittees' Files | Auditable Database | Summaries in Annual Reports |
|--|--|--------------------|-----------------------------|
| <u>Background Information</u> | | | |
| Co-permittee name | ✓ | ✓ | |
| Name of agency performing inspection | ✓ | ✓ | |
| Name of inspector for each inspection | ✓ | ✓ | |
| Business or facility name ¹ | ✓ | ✓ | |
| Address of facility | ✓ | ✓ | |
| Type of business | ✓ | ✓ | |
| Name of local operator ¹ | ✓ | ✓ | |
| Priority of business/facility for inspection per MRP ¹ | ✓ | ✓ | |
| Whether facility covered under Industrial General Permit | ✓ | | |
| Unique facility ID (assigned by inspection agency) | ✓ | ✓ | |
| <u>Inspection Information</u> | | | |
| Date of each inspection | ✓ | ✓ | |
| Facility contact | ✓ | ✓ | |
| Determination of whether commercial or industrial activities have no exposure to stormwater ¹ | ✓ | | |
| List of substantial violation(s) of co-permittee's ordinances: <ul style="list-style-type: none"> • Illicit discharges to MS4, • Use of inadequate BMPs, • Other violations | ✓ | ✓ | |
| List of less significant and potential violations ¹ of co-permittee's ordinances | ✓ | ✓ | |
| Determination that there are no violations (no action required) | ✓ | ✓ | |
| Determination of whether facility not covered under a General Permit may need to be | ✓ | | |
| Frequency of inspections – (report generated from database) | | ✓ | |
| Comparison of frequency of inspections for each business to inspection plan – (report generated from database) | | ✓ | |
| Frequency of substantial, less significant, and potential violations, types of violations, and types of violations by type of business – (reports generated from database) | | ✓ | |
| <u>Follow Up Actions</u> | | | |
| Indication whether re-inspections were required | ✓ | ✓ | |
| Re-inspection dates | ✓ | ✓ | |
| Violations corrected | ✓ | ✓ | |
| Date violations corrected or scheduled to be corrected | ✓ | ✓ | |
| Enforcement actions taken per agency's Enforcement Response Plan, including as applicable, number of verbal warnings, written warnings/warning notices, notices of violation, cost recovery actions, administrative fines, and legal actions | ✓ | ✓ | |
| Notification of Water Board for extended time frames for problem corrections ¹ | ✓ | ✓ | |
| Information on facilities that may need Industrial General Permit | ✓ | ✓ | |

¹ Per draft MRP dated December 4, 2007 and updated December 14, 2007

Industrial and Commercial Business Inspection Data

| Information Collected | Detailed Records in Co-permittees' Files | Auditable Database | Summaries in Annual Reports |
|---|--|--------------------|-----------------------------|
| coverage (provide to Water Board staff) | | | |
| <u>Programmatic Information</u> | | | |
| Copy of Inspection Plan created per MRP requirements | ✓ | | |
| Copy of any agreement(s) if co-permittee contracts with another agency or entity to perform inspections | ✓ | | |
| <u>Commercial & Industrial Business Inspections - Annual Reporting</u> | | | |
| Number of inspections completed for each type of business (e.g., food service facilities, automotive related, and Industrial General Permittees) in co-permittee's jurisdiction | | | ✓ |
| Comparison of number of facility inspections completed for each type of business with total number of businesses within each type | | | ✓ |
| Cumulative number of facility inspections completed since initiation of MRP requirement for each type of business | | | ✓ |
| Number of substantial, less significant, and potential violations for each type of business | | | ✓ |
| Number and percent of substantial violations corrected | | | ✓ |
| Number and percent of substantial violations requiring more than 48 hours for correction | | | ✓ |
| Number and percent of less significant violations corrected | | | ✓ |
| Number of different types of enforcement actions taken | | | ✓ |
| Facilities that may need to have coverage under the Industrial General Permit but have not filed for coverage | | | ✓ |
| <u>Commercial & Industrial Business Inspections - 4th Annual Report</u> | | | |
| Evaluate trends in number and percent of facilities inspected that have illicit non-stormwater discharges | | | ✓ |
| Evaluate trends in use of adequate vs. inadequate BMPs | | | ✓ |
| For facilities inspected annually, evaluate trends in substantial violations found and use of adequate vs. inadequate BMPs | | | ✓ |
| Evaluate how well inspection priorities assigned to each type of business correspond to number and types of violations found | | | ✓ |

Illicit Discharge Detection and Elimination

| Information Collected | Detailed Records in Co-permittees' Files | Auditable Database | Summaries in Annual Reports |
|--|--|--------------------|-----------------------------|
| <u>Check Point Screening for Illicit Discharges</u> | | | |
| Locations and types of strategic MS4 check points used for screening illicit discharges | ✓ | ✓ | |
| Location, date, and amount of time spent screening strategic MS4 check points | ✓ | ✓ | |
| Weather at time of screening strategic MS4 check points | ✓ | | |
| Total number of strategic MS4 check points screened each year (report generated from database) | | ✓ | |
| Total number of incident types observed each year (report generated from database) | | ✓ | |
| <u>Non-Check Point Findings of Illicit Discharges</u> | | | |
| Source of illicit discharge reports (e.g., illicit discharge inspectors, interdepartmental staff, other agency, citizen complaints, other) | ✓ | ✓ | |
| Basis of information about illicit discharge: field follow-up investigation or unverified report | ✓ | | |
| Total number of incident types observed each year (report generated from database) | | ✓ | |
| <u>Data on Each Illicit Discharge</u> | | | |
| Location of illicit discharge | ✓ | ✓ | |
| Source of illicit discharge (e.g., residential, industrial, commercial, automotive facilities, food facilities, construction sites, public facilities and utilities and other/unknown) | ✓ | ✓ | |
| Incident Type (e.g., vehicle washing, used oil dumping, accidental spill, pool discharge, sewage spill, etc.) | ✓ | ✓ | |
| Estimate of volume of illicit discharge, if quantifiable | ✓ | ✓ | |
| Frequency of illicit discharge: one time incident, intermittent, or continuous | ✓ | ✓ | |
| If applicable, name of waterbody into which illicit discharge occurred or was observed | ✓ | ✓ | |
| Results of any field testing and whether samples were collected for laboratory chemical testing | ✓ | ✓ | |
| Results of any laboratory testing relating to illicit discharge | ✓ | ✓ | |
| Name and contact information for person and/or business responsible for illicit discharge | ✓ | ✓ | |
| <u>Follow-Up Activities for Each Illicit Discharge</u> | | | |
| List of other agencies notified about illicit discharge and date(s) of referral | ✓ | ✓ | |
| Time required to abate illicit discharge, if it was a continuous or intermittent discharge | ✓ | ✓ | |
| Volume of illicit discharge cleaned up, if any | ✓ | ✓ | |
| Provide type of door hanger educational outreach materials distributed in area where illicit discharge originated, but source was indeterminable | ✓ | | |
| Enforcement actions taken per agency's Enforcement Response Plan: including, as applicable, number of verbal warnings, | ✓ | ✓ | |

Illicit Discharge Detection and Elimination

| Information Collected | Detailed Records in Co-permittees' Files | Auditable Database | Summaries in Annual Reports |
|--|--|--------------------|-----------------------------|
| written warnings/warning notices, notices of violation, cost recovery actions, administrative fines, and legal actions | | | |
| Information about illicit discharge abatement: Number of illicit discharges that 1) did not need abatement because they were one-time incidents; 2) were abated; or 3) have not been abated and are ongoing (report generated from database) | | ✓ | |
| Average amount of time required to abate each illicit discharge that was continuous or intermittent (report generated from database) | | ✓ | |
| <u>Programmatic Information</u> | | | |
| Name, job title, and contact information for each copermittee's Illicit Discharge Coordinator | ✓ | | |
| Description of user friendly illicit discharge reporting methods that copermittee has created for public | ✓ | | |
| Description of co-permittee's methods for publicizing and encouraging public to report illicit discharges | ✓ | | |
| Description of activities implemented to publicize and encourage public to report illicit discharges | ✓ | | |
| Co-permittee's program for training maintenance and other field staff to recognize illicit discharges and report them to the Illicit Discharge Coordinator | ✓ | | |
| Documentation of maintenance and other field staff's efforts to find and report illicit discharges | ✓ | | |
| Types of educational outreach BMP materials given to responsible parties | ✓ | | |
| <u>Illicit Discharge Detection/Elimination - Annual Reports</u> | | | |
| Summary of Co-permittees' Illicit Discharge Detection Program for current Fiscal Year: | | | |
| Public outreach to publicize and encourage reporting of illicit discharges via user friendly methods | | | ✓ |
| Strategic MS4 checkpoint screening including checkpoints visited and frequency of visits | | | ✓ |
| Municipal staff participation including efforts to train, remind, and encourage maintenance and other field staff, while conducting their maintenance and other field work, to look for and report illicit discharges to co-permittees' Illicit Discharge Coordinators and Illicit Discharge Coordinators' activities to find illicit discharges | | | ✓ |
| Total number of illicit discharges found each fiscal year | | | ✓ |
| Number and percent of sources of illicit discharges (e.g., residential, industrial, commercial, automotive facilities, food facilities, construction sites, public facilities and utilities and other/unknown) | | | ✓ |
| Number and percent of incident types (e.g., vehicle washing, used oil dumping, accidental spill, pool discharge, sewage spill, | | | ✓ |

Illicit Discharge Detection and Elimination

| Information Collected | Detailed Records in Co-permittees' Files | Auditable Database | Summaries in Annual Reports |
|---|--|--------------------|-----------------------------|
| etc.) | | | |
| Information about number of illicit discharges comprising a one-time incident that did not require abatement, number abated, and number that are unabated and ongoing | | | ✓ |
| Number of enforcement actions taken per agency's Enforcement Response Plan including, as applicable, total number of: verbal warnings, written warnings/warning notices, notices of violation, cost recovery actions, administrative fines, and legal actions | | | ✓ |
| <u>Illicit Discharge Detection/Elimination - 4th Annual Report</u> | | | |
| Information on the number of illicit discharges found each fiscal year and analysis of any trends | | | ✓ |
| Analysis to determine if there are any trends in the incident types and sources of illicit discharges | | | ✓ |
| Analysis to determine if there are any trends in sources of illicit discharge reports (e.g., public; other agency; co-permittee's maintenance, other field staff, or Illicit Discharge Coordinator; and other) | | | ✓ |
| Comparison of the incident types, quantity, and number of illicit discharges found by screening strategic MS4 checkpoints versus illicit discharges found by other methods | | | ✓ |
| Evaluation of effectiveness of educational outreach to residents and businesses | | | ✓ |
| Evaluation of effectiveness of co-permittees' enforcement actions | | | ✓ |

**Agreement To Comply with Clean Water Program (CWP)
“Best Management Practices”
at
Mobile Food Vehicle Operations**

Agreement

- 1 I agree to dispose all wastewater into the **Sanitary Sewer** at my commissary.
- 2 I agree to follow the CWP “Best Management Practices” listed below as a condition of my Health Permit.
- 3 I agree to ensure all employees and contractors operating my mobile food vehicle are adequately trained in these CWP “Best Management Practices”, and that they will comply with these requirements.
- 4 I understand that I may be fined, and my health permit suspended or revoked, if I dispose my wastewater to any place (e.g., street, curb gutter, storm drain, etc.) other than the Sanitary Sewer at my commissary.

CWP Best Management Practices

DO dispose all wash water, spent cleaning solutions, and gray water from your holding tank into the **SANITARY SEWER** connection at your commissary.

- **DO NOT** dispose of these waste streams to the STORM DRAIN system (including no disposal to street, sidewalk, outdoor drain inlet, curb gutter, culvert, flood channel, creek, etc.). **To do so is ILLEGAL**, and may jeopardize your ability to receive a permit in the future, as well as result in legal action against you, including imposition of fines and penalties.

DO sweep up food particles, cigarette butts, and litter from the areas where your customers park and/or eat the food purchased from your food vehicle.

- **DO NOT** use water to clean these areas, and
- **DO NOT** leave these areas before you have cleaned them.

DO transport your used cooking oil back to your commissary for proper disposal.

- **DO NOT** dispose your used cooking oil to trash bins/dumpsters, outdoor areas, or any drains.

DO clean your mobile food unit, floor mats, trash bins, etc., at your commissary where appropriate disposal (e.g., SANITARY SEWER drains, etc.) is assured.

- **DO NOT** clean your mobile food unit or any of its equipment while out on your route - cleaning must occur at your commissary only.

DO provide an appropriately sized trash bin for your customers, and keep the area where it is located swept clean.

Name _____ Signature _____

Date _____ License plate _____ Decal # _____