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**CII Subcommittee Meeting**  
**March 16, 2016 – 1:00 to 2:30 pm**  
**County Environmental Health – Conference Room**  
 2000 Alameda de las Pulgas – San Mateo

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**AGENDA**

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|---|---------|---|
| <b>1. Introductions, Announcements, and Review Agenda</b><br><i>Outcome: Agree on agenda and receive announcements.</i>   | 5 min.  | <i>Ward Donnelly</i>                                |
| <b>2. Approval of Meeting Summary</b><br><i>Outcome: Approve September 2015 meeting summary with any needed changes.</i>  | 5 min.  | <i>Everyone</i>                                     |
| <b>3. Regional Water Board Staff Update</b><br><i>Outcome: Hear updates from Regional Water Board staff and new policy to attend subcommittee meetings.</i>   | 10 min  | <i>Devender Narala, SF Bay Regional Water Board</i> |
| <b>3. Update on County Environmental Health (CEH) Inspections</b><br><i>Outcome: Obtain status of CEH inspections for FY15/16 and data tracking tables.</i>   | 15 min. | <i>Patrick Ledesma, CEH</i>                         |
| <b>5. Adopted MRP 2.0</b><br><i>Outcome: Discuss changes to Provisions C.4 and C.5 and Program assistance needed.</i>   | 20 min  | <i>Kristin/ Everyone</i>                            |
| <b>6. CII Training Workshop</b><br><i>Outcome: Discuss possible workshop topics, speakers and dates for this FY.</i>  | 15 min  | <i>Kristin/ Everyone</i>                            |
| <b>6. Share Information on Illicit Discharge and Industrial/Commercial Inspection Problems</b><br><i>Outcome: Identify common problems and gain information on successful ways to resolve them.</i> | 15 min. | <i>Everyone</i>                                     |
| <b>7. Agree on Next Meeting Date and Topics</b><br><i>Outcome: Agree on next meeting date of April 20<sup>th</sup> or June 15<sup>th</sup> and topics.</i>  | 5 min.  | <i>Everyone</i>                                     |

## **DRAFT CII Subcommittee Report**

**Meeting Date:** September 16, 2015

**Subcommittee Actions:**

- Agreed that the June 2015 subcommittee meeting summary was acceptable.

**Requested Action or Feedback/Guidance (if any):** None.

**Other Information/Announcements:**

- **Update on County Environmental Health (CEH) Inspections.** The CEH Stormwater Inspection data are available on SMCWPPP's flowstobay.org website under Annual Report Guidance. On the Annual Report Guidance page there is a list of the individual cities. When you click on a city name you are directed to a OneDrive folder. This folder contains an Excel workbook with a tab containing all of the inspection data and a summary tab for annual reporting. The folder also contains one or two files with the pdf inspection reports. The Excel spreadsheets and pdf files will be periodically updated with the current CEH inspection report data. The FY15/16 inspection files were not posted on the website yet. Patrick Ledesma will look into getting those posted.

CEH is pilot testing paperless inspection forms in the field. This FY will be a combination of electronic and hard copy forms until all of the inspectors switch to paperless.

- **MRP 1.0 Annual Reporting.** There were no comments on Annual Reporting for FY14/15.
- **MRP 2.0 Compliance Assistance.** Kristin solicited feedback from the Subcommittee regarding what priority assistance they would like to receive from C/CAG (i.e., SMCWPPP) in the future to help with compliance with MRP 2. Subcommittee members were encouraged to provide input to their TAC representative regarding, for example, whether there is a need for training or assistance with implementing Mobile Business Control requirements (e.g., outreach, inventories and updating the enforcement table). The group agreed that the quarterly Subcommittee meetings were important to continue.

A revised Tentative Order (TO) will be released a few weeks before permit adoption in November. The next Subcommittee meeting is tentatively scheduled for December 16, 2015, but it may be canceled.

- **Other Information.** Members shared some interesting commercial business inspection cases.

Kristin will post an updated version of the Mobile Business Enforcement Action table on the SMCWPPP website. If you have any additional enforcement actions please email them to Kristin to be included in the updated table.

There is an upcoming two day Workshop (September 30<sup>th</sup> and October 1<sup>st</sup>) through UC Berkeley Extension on the State Industrial Stormwater General Permit (IGP). The flyer was emailed to the Subcommittee and passed around at the meeting.

Kristin distributed the Working Draft Regional BMPs for Mobile Washers of Exterior Surfaces developed by the BACWA Pretreatment Committee. It was noted that these BMPs state no discharge to storm drain but the BASMAA Mobile Surface Cleaner BMPs do allow discharges under specific conditions.

The revised State General Permit for Discharges from Utility Vaults and Underground Structures to Waters of the U.S. became effective on July 1, 2015. This permit “encourages communication between Dischargers under this Order and local agencies responsible for MS4s”. The permit also requires a Discharge Characterization Study and a BMP Plan. The Notice of Intent (NOI) applications and BMP Plans for dischargers are available on the State Board website at [http://www.swrcb.ca.gov/water\\_issues/programs/npdes/utilityvaults.shtml](http://www.swrcb.ca.gov/water_issues/programs/npdes/utilityvaults.shtml).

**Subcommittee Work That Affects Other Subcommittees:** None.

**Next Steps:**

- Post the updated Mobile Business Enforcement Actions table to the [flowstobay.org](http://flowstobay.org) website.

**Next Meeting Date:** The Subcommittee is tentatively scheduled to meet next on Wednesday December 16, 2015 at 1:00 pm. *<post-meeting note: the December 16 meeting has been cancelled>*

MRP R2-2015-0049	MRP R2-2009-0074
<b>Provision C.4 Industrial and Commercial Site Controls</b>	
<b>C.4.a. Legal Authority for Effective Site Management</b>	
ii. Implementation Level	Same in previous permit C.4.a.ii.(1).
	Removed C.4.a.ii.(2) Permittees shall notify the discharger of any actual or potential pollutant sources and violations and require problem correction within a reasonably short and expedient time frame commensurate with the threat to water quality. Permittees shall require timely correction of problems involving rapid temporary repair, and may allow longer time periods for implementation of more permanent solutions, if these require significant capital expenditure or construction. Violations shall be corrected prior to the next rain event or within 10 business days after the violations are noted. If more than 10 business days are required for correction, a rationale shall be given in the tabulated sheets.
<b>C.4.b Industrial and Commercial Business Inspection Plan</b>	
ii.(1) Facilities for Prioritization into Inspection Plan Commercial and industrial facilities with the functional aspects and types described below, and other facilities identified by the Permittees as reasonably likely to contribute to pollution of stormwater runoff, shall be prioritized for inspection on the basis of the potential for water quality impact using criteria such as pollutant sources on site, pollutants of concern, proximity to a waterbody, potential and actual discharge history of the facility, and other relevant factors.	Same as C.4.b.ii.(3)
ii.(1).(a) Sites that include the following types of functions that may produce pollutants when exposed to stormwater ....	Same as previous permit C.4.b.ii.(1)
ii.(1).(b) The following types of industrial and commercial businesses that have a reasonable likelihood to be sources of pollutants to stormwater and non-stormwater discharges....	Same as previous permit C.4.b.ii.(2)
ii.(2) Inspection Plan: The Inspection Plan shall be updated annually and shall contain the following information	New requirement

MRP R2-2015-0049	MRP R2-2009-0074
ii.(2).(a) A description of the process for prioritizing inspections and frequency of inspections.	Same as C.4.b.i.(2)
<p><u>The prioritization criteria shall assign a more frequent inspection schedule to the highest priority facilities per Provision C.4.b.ii.(1).</u></p>	<p>Similar to C.4.b.i.(1) Total number and a list of industrial and commercial facilities requiring inspection, within each Permittee’s jurisdiction, to be determined on the basis of a prioritization criteria designed to assign a more frequent inspection schedule to the highest priority facilities per Section C.4.b.ii. below.</p>
<p>If any geographical areas are to be targeted for inspections due to high potential for stormwater pollution, these areas should be indicated in the Inspection Plan.</p>	Same as C.4.b.i.(2)
ii.(2).(b) Assign appropriate inspection frequency for each industrial and commercial facility based on the priority established in Provision C.4.b.ii.(2)(a) above, potential for contributing pollution to stormwater runoff, and commensurate with the threat to water quality.	Same as C.4.b.ii.(5)
ii.(2).(c) A mechanism to include new businesses that warrant inspections.	Same as C.4.b.i.(2)
ii.(2).(d) Total number and a list of all industrial and commercial facilities requiring inspections, within each Permittee’s jurisdiction, based on the prioritization criteria established in Provision C.4.(b)ii.(2)(a).	Similar to C.4.b.i.(1)
<p>This list shall be updated annually.</p>	<p>Similar to C.4.b.ii. Each Permittee shall annually update and maintain a list of industrial and commercial facilities in the Inspection Plan to inspect that could reasonably be considered to cause or contribute to pollution of stormwater runoff.</p>
ii.(2).(e) List of facilities scheduled for inspection each fiscal year of the MRP permit term. Each fiscal year’s inspection list shall be added to the Inspection Plan at the beginning of the fiscal year as part of the annual update. Previous fiscal years’ inspection lists shall remain in the Inspection Plan.	New requirement for Inspection Plan (previously submitted in Annual Report C.4.b.iii.(2))
ii.(3).(a), (c) and (d)	Same as C.4.b.ii.(6)

MRP R2-2015-0049	MRP R2-2009-0074
<p>ii.(3).(b) A brief description of business activity or pollutant source, including SIC code. Examples: outdoor process/manufacturing areas, outdoor material storage areas, outdoor waste storage and disposal areas, outdoor vehicle and equipment storage and maintenance areas, outdoor parking areas and access roads, outdoor wash areas, rooftop equipment, and outdoor drainage from indoor areas;</p>	<p>Similar to  C.4.b.ii.(6).(b) A brief description of business activity including SIC code;  C.4.c.ii.(4).(f) Type of Activity or Pollutant Source  Examples: Outdoor process/manufacturing areas, Outdoor material storage areas, Outdoor waste storage/disposal areas, outdoor vehicle and equipment storage/maintenance areas, Outdoor parking areas and access roads, Outdoor wash areas, Rooftop equipment, Outdoor drainage from indoor areas</p>
<p>iii Reporting</p>	<p>Same as C.4.b.iii.(1)</p>
<p><b>C.4.c Enforcement Response Plan (ERP)</b></p>	
<p>ii.(1) Enforcement Procedures – A description of the Permittee’s procedures, from the discovery of problems through the confirmation of implementation of corrective actions. This shall include guidance for appropriate enforcement actions, followup inspections, referrals to another agency, appropriate time periods for implementation of corrective actions, and the roles and responsibilities of staff responsible for implementing the ERP.</p>	<p>Similar to  C.4.c.ii.(1) The ERP will provide guidance on appropriate use of the various enforcement tools, such as verbal and written notices of violation, citations, cleanup requirements, administrative and criminal penalties.  C.4.c.ii.(2) A description of the Permittee’s procedures for follow-up inspections and enforcement actions or referral to another agency, including appropriate time periods for each level of corrective action.</p>
<p>ii.(2) Enforcement Tools and Field Scenarios – A discussion of the various, escalating enforcement tools for different field scenarios, including, but not limited to potential discharges (e.g., housekeeping issues, evidence of actual non-stormwater discharges, lack of BMPs, inadequate BMPs, and inappropriate BMPs), actual non-stormwater discharges, non-compliance with previous enforcement actions, and sites with a history of potential and/or actual non-stormwater discharges.</p>	<p>Similar to C.4.c.ii.(1) Required enforcement actions – including timeframes for corrections of problems – for various field violation scenarios.</p>

MRP R2-2015-0049	MRP R2-2009-0074
<p>ii.(3) Timely Correction of Potential and Actual Non-stormwater Discharges – A description of the Permittee’s procedures for assigning due dates for corrective actions. Permittees shall require timely correction of <u>all potential and actual non-stormwater discharges</u>. <u>Permittees shall require active non-stormwater discharges to cease immediately</u>. Corrective actions shall be implemented before the next rain event, but no longer than 10 business days after the <u>potential and/or actual non-stormwater discharges</u> are discovered. <u>Corrective actions can be temporary and more time can be allowed for permanent corrective actions</u>. If more than 10 business day are required for compliance, a rationale shall be recorded in the electronic database or equivalent tabular system.</p>	<p>Similar to C.4.c.ii.(2) All violations must be corrected in a timely manner with the goal of correcting them before the next rain event but no longer than 10 business days after the violations are discovered. If more than 10 business days are required for compliance, a rationale shall be recorded in the electronic database or equivalent tabular system.</p>
<p>ii.(4) Referral and Coordination with Other Agencies – Each Permittee shall enforce its stormwater ordinances to achieve compliance at sites with observed potential and actual non-stormwater discharges required in Discharge Prohibition A.1. For cases in which Permittee enforcement tools are inadequate to remedy the noncompliance, the Permittee shall refer the case to the Water Board, district attorney, or other relevant agencies for additional enforcement.</p>	<p>Similar to C.4.c.ii.(3) Each Permittee shall enforce its stormwater ordinances as necessary to achieve compliance at sites with observed violations. For cases in which Permittee enforcement tools are inadequate to remedy the noncompliance, the Permittee shall refer the case to the Water Board, district attorney or other relevant agencies for additional enforcement.</p>
<b>C.4.d Inspections</b>	
ii.(1) Inspections	Same as C.4.b.ii.(4)
ii.(2) Recordkeeping (a-f, h)	Same as C.4.c.ii.(4).a, b, c, d, g, e, h
ii.(2) (g) Problem resolution <u>date</u>	C.4.c.ii.(4).(h) Problem Resolution
ii.(3) Data Evaluation – Permittees shall evaluate the frequency of potential and actual non-stormwater discharges by business category. Note trends and, as needed, implement focused inspections or education in subsequent years to address trends.	
iii. Reporting	Same as C.4.c.iii for 2015-2016 Annual Report and small reduction in reporting beginning with 2016-2017 Annual Report
<b>C.4.e Staff Training</b>	
ii. At a minimum, provide inspection training, within the 5-year term of this Permit, in the following topics	C.4.d.ii At a minimum, train inspectors, within the 5-year term of this Permit, in the following topics
ii.(1) Urban runoff pollution prevention	Same as C.4.d.ii.(1)
ii.(2) Inspection procedures;	Same as C.4.d.ii.(2)

MRP R2-2015-0049	MRP R2-2009-0074
ii.(3) Business Inspection Plan;	New requirement
ii.(4) Enforcement Response Plan;	New requirement
ii.(5) Illicit Discharge Detection and Elimination;	Same as C.4.d.ii.(3) Illicit Discharge Detection, Elimination and follow-up
ii.(6) Appropriate BMPs to be used at different industrial and commercial facilities.	Same as C.4.d.ii.(4) Implementation of typical BMPs at Industrial and Commercial Facilities
iii.(1) Report dates of training	Same as C.4.d.iii.(1)
iii.(2) Report training topics covered	Same as C.4.d.iii.(2)
iii.(3) Report percentage of industrial and commercial site inspectors attending training	New requirement (previously C.4.d.iii.(3) Percentage of Permittee inspectors attending training)
iii.(4) Report percentage of Illicit Discharge, Detection, and Elimination inspectors attending training	New requirement (previously C.4.d.iii.(3) Percentage of Permittee inspectors attending training)
<b>Provision C.5 Illicit Discharge Detection and Elimination</b>	
<b>C.5.a. Legal Authority</b>	
ii.(1) (a, c-f)	Same as C.5.a.ii.(1) (a, c-f)
ii.(1).(b) Discharges of wash water resulting from the cleaning of exterior surfaces and pavement, or the equipment and other facilities of any commercial business, or any other public or private facility, <u>including discharges from mobile cleaning businesses</u>	Similar to C.5.a.ii.(1).(b) Discharges of wash water resulting from the cleaning of exterior surfaces and pavement, or the equipment and other facilities of any commercial business, or any other public or private facility
ii.(2) Permittees shall have adequate legal authority to prohibit, discover through inspection and surveillance, and eliminate illicit connections and discharges to <u>the MS4</u>	Similar to C.5.a.ii.(2) Permittees shall have adequate legal authority to prohibit, discover through inspection and surveillance, and eliminate illicit connections and discharges to storm drains
ii.(3) Permittees shall have adequate legal authority to control the discharge of spills, dumping, or disposal of materials other than storm water to <u>the MS4</u> .	Similar to C.5.a.ii.(2) Permittees shall have adequate legal authority to control the discharge of spills, dumping, or disposal of materials other than storm water to storm drains
<b>C.5.b Enforcement Response Plan</b>	



MRP R2-2015-0049	MRP R2-2009-0074
<p>ii.(1) Enforcement Procedures – A description of the Permittee’s procedures, from the discovery of problems through the confirmation of implementation of corrective actions. This shall include guidance for appropriate enforcement actions, followup inspections, referrals to another agency, appropriate time periods for implementation of corrective actions, and the roles and responsibilities of staff responsible for implementing the ERP.</p>	<p>Similar to C.5.b.ii.(3) If corrective actions are not implemented promptly or if there are repeat violations, Permittees shall escalate responses as needed to achieve compliance, including referral to other agencies were necessary.</p>
<p>ii.(2) Enforcement Tools and Field Scenarios – A discussion of the various, escalating enforcement tools for different field scenarios, including, but not limited to potential discharges (e.g., housekeeping issues, evidence of actual non-stormwater discharges, lack of BMPs, inadequate BMPs, and inappropriate BMPs), actual non-stormwater discharges, non-compliance with previous enforcement actions, and sites with a history of potential and/or actual non-stormwater discharges.</p>	<p>Similar to C.5.b.ii.(1) Recommended responses and enforcement actions – including timeframes for corrections of problems – for various types and degree of violations. The ERP shall provide guidelines on when to employ the range of regulatory responses from warnings, citations and cleanup and cost recovery, to administrative or criminal penalties.</p>
<p>ii.(3) Timely Correction of Potential and Actual Non-stormwater Discharges – A description of the Permittee’s procedures for assigning due dates for corrective actions. Permittees shall require timely correction of <u>all potential and actual non-stormwater discharges</u>. <u>Permittees shall require active non-stormwater discharges to cease immediately</u>. Corrective actions shall be implemented before the next rain event, but no longer than 10 business days after the <u>potential and/or actual non-stormwater discharges</u> are discovered. Corrective actions can be temporary and more time can be allowed for permanent corrective actions. If more than 10 business day are required for compliance, a rationale shall be recorded in the electronic database or equivalent tabular system.</p>	<p>Similar to C.5.b.ii.(2) Timely Correction of Violations: All violations must be corrected in a timely manner with the goal of correcting them before the next rain event but no longer than 10 business days after the violations are discovered. If more than 10 business days are required for compliance, a rationale shall be recorded in the electronic database or equivalent tabular system. Immediate correction can be temporary and short-term if a long-term, permanent correction will involve significant resources and construction time. An example would be replumbing of a wash area to the sanitary sewer, which would involve an immediate short-term, temporary fix followed by permanent replumbing.</p>
<p><b><i>C.5.c. Spill, Dumping and Complaint Response Program</i></b></p>	
<p>ii.(1) Each Permittee shall have a central contact point for the public and Permittee’s staff to report spills, dumping, and complaints. At a minimum, this central contact point shall include a phone number.</p>	<p>Similar to C.5.c.i Permittees shall have a central contact point, including a phone number for complaints and spill reporting, and publicize this number to both internal Permittee staff and the public. If 911 is selected, also maintain and publicize a staffed, non-emergency phone number with voicemail, which is checked during normal business hours.</p>
<p>Permittee shall also include, as feasible, user friendly web reporting for spills and dumping.</p>	<p>New requirement</p>

MRP R2-2015-0049	MRP R2-2009-0074
(2) Each Permittee shall publicize the phone number and web reporting address, if used, to internal Permittee's staff and the public.	Similar to C.5.c.i ..... publicize this number to both internal Permittee staff and the public.
The Permittee's website shall be one of the places the central contact point is publicized. The Permittee's website shall be updated with the central contact point to report spills and dumping by June 30, 2016. This central contact point shall be readily searchable on the Permittee's website.	New requirement
(3) Each Permittee shall require its municipal staff conducting routine maintenance and inspection activities to report illicit discharges found during their activities to the central contact point so that illicit discharge staff can investigate and track.	New requirement but similar to C.5.e.i. Permittees shall perform routine <u>surveys for illicit discharges and illegal dumping</u> in above ground check points in the collection system including elements that are typically inspected for other maintenance purposes, such as end of pipes, creeks, flood conveyances, storm drain inlets and catch basins, in coordination with public works/flood control maintenance surveys, video inspections of storm drains, and <u>during other routine Permittee maintenance and inspection activities when Permittee staff are working in or near the MS4 system.</u>
(4) Each Permittee shall maintain and update, as needed, a spill, dumping, and complaint response flow chart and/or phone tree for the Permittee's staff responsible for the spill and dumping response program. At a minimum, this flow chart and/or phone tree shall identify staff or positions responsible for receiving the complaints and investigating and abating the complaints.	New requirement
(5) Each Permittee shall maintain and update, as needed, a spill, dumping, and complaint response flow chart and phone tree or contact list for internal use that shows the various responsible agencies and their contacts, who would be involved in illicit discharge incident response that goes beyond the Permittee's immediate capabilities.	Same as C.5.c.i Permittees shall develop a spill/dumping response flow chart and phone tree or contact list for internal use that shows the various responsible agencies and their contacts, who would be involved in illicit discharge incident response that goes beyond the Permittees immediate capabilities. The list shall be maintained and updated as changes occur.
(6) Each Permittee shall conduct reactive inspections in response to spill, dumping, and complaint reports and shall also conduct followup inspections, as needed, to ensure that corrective measures have been effectively implemented to achieve and maintain compliance.	Same as C.5.c.i Permittees shall conduct reactive inspections in response to complaints and follow-up inspections as needed to ensure that corrective measures have been implemented to achieve and maintain compliance
iii. Reporting - Permittees shall provide the following information in the 2016 and 2020 Annual Reports	New requirement

MRP R2-2015-0049	MRP R2-2009-0074
iii.(1) The spill and dumping reporting phone number <u>and the web address</u> , if used;	Similar to C.5.c.iii Submit the complaint and spill response phone number
iii.(2) A screen shot of the Permittee’s website showing the central contact point;	New requirement
iii.(3) A discussion of how the central contact point – spill and dumping reporting phone number and, if used, the web address – is being publicized to Permittees’ staff and the public.	New requirement
	Removed reporting requirement for spill contact list
<b><i>C.5.d Tracking and Case Follow-up</i></b>	
i. All incidents or discharges reported to the spill, dumping, and complaints central contact point, <u>that might discharge into the MS4</u> , shall be logged to track followup and response through problem resolution. The data collected shall be sufficient to demonstrate escalating responses for repeated problems and inter/intra-agency coordination, where appropriate. <u>It is not necessary to track and report data according to this provision if they are tracked and reported according to State Water Resource Control Board Order No. 2006-0003-DWQ.</u>	Similar to C.5.f.i All incidents or discharges reported to the complaint/spill system that might pose a threat to water quality shall be logged to track follow-up and response through problem resolution. The data collected shall be sufficient to demonstrate escalating responses for repeated problems, and inter/intra-agency coordination, where appropriate.
ii.(1) Complaint information	Same as C.5.f.ii.(1)
ii.(2) Investigation information (a) Date and time started, (b) Type of pollutant, (c) Entered storm drain and/or receiving water, (d) Date <u>and time</u> abated, and (e) Type of enforcement <u>based on the Permittee’s ERP.</u>	Similar to C.5.f.ii.(2) (a) Date and time started, (b) Type of pollutant, (c) Entered storm drain and/or receiving water, (d) Date abated, (e) Type of enforcement (if applicable).
	Removed C.5.f.ii.(3)Response time (days) (a) Call to investigation (b) Investigation to abatement (c) Call to abatement
iii. Reporting	Same as C.5.f.iii
	Removed C.5.f.iii.(4) Summary of major types of discharges and complaints.
<b><i>C.5.e Control of Mobile Sources</i></b>	

MRP R2-2015-0049	MRP R2-2009-0074
ii.(1) (a, b, d, e) and (2)	Same as C.5.d.ii.(1) and (2)
ii.(1).(c) Regularly updating mobile business inventories	New requirement
iii.(1) Report in 2017 Annual Report:	
(a) minimum standards and BMPs for each of the various types of mobile businesses; (b) enforcement strategy	Same as C.5.d.iii
(c) a list and summary of the specific outreach events and education conducted to the different types of mobile businesses operating within the Permittee's jurisdiction; (d) the number of inspections conducted at mobile businesses and/or job sites in 2016-2017; (e) discuss enforcement actions taken against mobile businesses in 2016-2017; (f) Permittee's inventory of mobile businesses operating within the Permittee's jurisdiction; (g) a list and summary of the county-wide or regional activities conducted, including sharing of mobile business inventories, BMP requirements, enforcement action information, and education (Permittees' annual reports may refer to the county-wide or regional reports for this information.).	New requirements
iii.(2) Report in 2019 Annual Report	
(a) changes to minimum standards and BMPs for each of the various types of mobile businesses; (b) changes in enforcement strategy	Same as C.5.d.iii

MRP R2-2015-0049	MRP R2-2009-0074
<p>(c) minimum standards and BMPs developed for additional types of mobile businesses;</p> <p>(d) a list and summary of specific outreach events and education conducted to each type of mobile businesses operating within the Permittee’s jurisdiction during the Permit term;</p> <p>(e) a discussion of the inspections conducted at mobile businesses and/or job sites;</p> <p>(f) Permittee’s inventory of mobile businesses operating within the Permittee’s jurisdiction;</p> <p>(g) a discussion of the enforcement actions taken against mobile businesses during the permit term.</p>	New requirements
<b><i>C.5.f Municipal Separate Storm Sewer System (MS4) Map</i></b>	
<p>ii. Permittees shall make maps of the MS4 publicly available, either electronically or in hard copy. Public availability shall be made through a single point of contact that is convenient for the public, such as a staffed counter or web accessible maps. The MS4 map availability shall be publicized through Permittee directories and web pages.</p>	<p>Same as C.5.e.ii. Make maps of the MS4 publicly available, either electronically or in hard copy by July 1, 2010. The public availability shall be through a publicized single point of contact that is convenient for the public, such as a staffed counter or web accessible maps. The MS4 map availability shall be publicized through Permittee directories and web pages</p>
<p><b>iii. Reporting</b> – In the 2016 and 2019 Annual Reports, Permittees shall discuss how they make MS4 maps available to the public and how they publicize the availability of the MS4 maps.</p>	New requirement

MRP R2-2015-0049	MRP R2-2009-0074
	<p>Removed C.5.e. Collection System Screening requirements:</p> <p>Permittees shall develop and implement a screening program utilizing the USEPA/Center for Watershed Protection publication, “Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessment.” Permittees shall implement the screening program by conducting a survey of strategic collection system check points (one screening point per square mile of Permittee urban and suburban jurisdiction area, less open space) including some key major outfalls draining industrial areas as defined in 40 CFR 122.26 (b)(5) once each year in dry weather conditions meaning no significant rainfall within the past 3 weeks. Routine surveys that occur on an ongoing basis during regular conveyance system inspections may be credited toward this requirement.</p> <p>Reporting – Permittees shall provide a summary of their collection screening program, a summary of problems found during collection system screening, and any changes to the screening program in each Annual Report.</p>
<b><i>Provision C.12 PCBs Control</i></b>	
	<p>Removed C.12.a. Implement Project throughout Region to Incorporate PCBs and PCB- Containing Equipment Identification into Existing Industrial Inspections</p>
<b><i>Provision C.13 Copper Controls</i></b>	
<b>C.13.b. Manage Discharges from Pools, Spas, and Fountains that Contain Copper-Based Chemicals</b>	
b.ii. Implementation Level	Same as C.13.b.ii
b.iii.(1) In the 2016 Annual Report, the Permittees shall certify that legal authority currently exists to prohibit the discharges to storm drains of water containing copper-based chemicals from pools, spas, and fountains.	Same as C.13.b.iii. The Permittees shall certify adequate legal authority in their 2011 Annual Report or otherwise provide justification for schedule not to exceed one year to comply.

MRP R2-2015-0049	MRP R2-2009-0074
b.iii.(2) In the 2016 Annual Report, the Permittees shall report how copper containing discharges from pools, spas, and fountains are addressed to accomplish the prohibition of the discharge.	New requirement
b.iii.(3) The Permittees shall report annually on any enforcement activities	New requirement
<b>C.13.c. Industrial Sources</b>	Same as C.13.d
<b><i>Provision C.15. Exempt and Conditionally Exempt Discharges</i></b>	
<b>C.15.b.v Discharge Type – Swimming Pool, Hot Tub, Spa, and Fountain Water Discharges</b>	Same as C.15.b.v

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**AGENDA**  
**Commercial/Industrial Stormwater Inspector Workshop**  
**SMCWPPP CII Subcommittee**  
**Wind Room, Library Community Center**  
**1000 E. Hillsdale Blvd., Foster City, CA 94404**  
**Thursday, April 17, 2014**  
**8:00 a.m. – 12:00 noon**

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<b>Refreshments</b> <i>Registration</i>	8:00 – 8:30
<b>Welcoming Remarks</b> <i>Ward Donnelly, City of Daly City, Commercial, Industrial, and Illicit Discharge Control Subcommittee Chair</i>	8:30 – 8:35
<b>Regulatory Refresher</b> <i>Kristin Kerr, EOA, Inc.</i>	8:35 – 9:00
<b>Performing Stormwater Inspections</b> <i>Patrick Ledesma, County Environmental Health</i>	9:00 – 9:45
<b>Your City Attorney’s Role in Enforcement Actions</b> <i>Lance Bayer, Attorney for City of San Mateo</i>	9:45 – 10:35
<b>Break</b>	10:35 – 10:50
<b>Group Table Top Exercise: Discussing Inspection Scenarios</b> <i>Facilitator</i>	10:50 – 11:50
<b>Closing Remarks</b> <i>Ward Donnelly, CII Chair</i>	11:50 – 11:55

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**Evaluation Summary**  
**44 Summaries**  
**53 Attendees**  
**83% completed evaluation forms**

**Commercial/Industrial Stormwater Inspector Training Workshop**  
**SMCWPPP CII Subcommittee**  
**Thursday, April 17, 2014**  
**8:00 a.m. – 12:00 noon**

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**What Did You Think of the Following Presentations and Activities?**

**1. Regulatory Refresher –Kristin Kerr, EOA**

very helpful **35** somewhat helpful **8** not helpful **1**

Comments:

- Did a good job of explaining our authority.
- It is difficult to cover the info in the allotted amount of time.
- Good overview of NPDES/regulatory umbrella.
- Good.
- Thanks for breaking it down for us. Good to know more about NOIs. More info on updates and new requirements please. QISP training??
- Great overview, especially for new inspectors. Good review of major industrial permit changes.
- Good to know the latest updates on the permit.
- Did a great job.
- I needed to know why we are inspecting. MS4 Permit good overview of the MS4.
- Very informative but screen is hard to read and type on handout is too small.
- Would like to have asked questions during presentation.

2. **Performing Stormwater Inspections** – *Patrick Ledesma, County Environmental Health*  
very helpful **38** somewhat helpful **4** not helpful **1**

Comments:

- I like the pictures.
- Good and fun speaker.
- Good examples.
- Pictures and descriptions of issues were very helpful in showing big picture.
- Pretty good actually.
- The projector was not too bright.
- Good.
- Great humor and example photos. Very engaging. More info on utility box discharges. Ok? With BMPs? Car washing with “Just water”? Ok? More info.
- He clarified important concepts and showed applicable examples.
- Very nice job. Simple and direct.
- Lots of good information. Will help when doing inspections. Great pictures.
- Very good presentation and lots of good info. Still too light in room for PowerPoint presentation and pics on handout are too small.
- Gave good examples of Illicit Discharge where you do not see.

3. **Your City Attorney’s Role in Enforcement Actions** – *Lance Bayer, Attorney for City of San Mateo*

very helpful **31** somewhat helpful **10** not helpful **0**

Comments:

- Coverage is too broad and scattered. Needs more time.
- Very informative on enforcement actions.
- Great Info.
- Good story.
- Good.
- Wow! Interesting. Cool to hear from an attorney about enforcement and liability. Pictures and PowerPoint would have been good to outline points. Necessary evidence. Engaging speaker.
- It was good to discuss the pertinent actions and how a violation can escalate to enforcement.
- I think most inspectors don’t want to go this far with enforcement. Info supplied was informative if this turns into an investigation for enforcement.

- Good information, basic knowledge that everyone should be aware of and know as inspectors.
- Mr. Bayer explained himself thoroughly and simplified things. Gave good understanding of the land and what can be done against violators.
- Would like to hear additional cases of incidents where D.A. gets involved in Stormwater violations.

#### 4. **Group Exercise: Inspection Scenarios**

very helpful **28** somewhat helpful **5** not helpful **0**

Comments:

- Did not attend this portion.
- Helps put things into prospective before going out to the field. Scenarios really helped with getting to understand the levels of enforcement, violations and documentation.
- Realistic.
- Useful.
- Good.
- It was interesting to hear different perspectives and feedback from the group.
- Spent a little too much time on each scenario. Maybe do 5 minute to 10 minutes.
- It's productive to get other inspector views and ideas.
- Good scenarios/good input.

**Did this workshop meet your expectations?** Yes **42** No **0**

Exceeded

#### **What parts of the workshop were most useful to you?**

- PowerPoint/visual media.
- The photos and PowerPoint slides with explanations.
- Pictures.
- Enforcement action; performing inspections.
- Example pictures were very helpful.
- Photos, exercise etc.
- Inspection process examples.
- Scenarios (3)
- Table top examples (2)
- Inspection scenarios.
- Group scenarios.

- Real examples.
- Real-world examples
- Discussions of real world scenarios.
- Exercises (3)
- Group Exercise.
- Feel more confident and well-informed about approaching grey area that may fall in between a verbal warning and written warning.
- Picture examples, group activities, developing case on stormwater violation.
- Inspection and enforcement presentations provide reference for my job.
- I found the group exercises the most useful because it was good to discuss with different people their opinions/thoughts.
- Having exercises and attorney speak about regulations and laws.
- Attorney.
- Lance Bayer.
- All of it.
- Required refresher (make new permit requirements)
- The Refresher
- The inspection scenarios and regulatory update.
- Inspection training.
- Updates on CII requirements for reporting.
- Performing Stormwater inspections talk and regulation review.
- The workshop was very interesting and useful.
- All 3 parts were beneficial/informative. Patrick's part was most immediately useful.

### **What would have made this workshop more useful?**

- The entire workshop was very useful.
- Colored PowerPoint pictures.
- Discussion on options available to cities to staff for these inspections.
- Darker room so we can see slides.
- Better projector/Less sunlight glare.
- Very difficult to see slides.
- Being able to better see slides or handouts.
- Hard to see the slides.
- Lighting in room made it difficult to see screen/photos.
- Better media, less light.
- I had trouble seeing the PowerPoint. Lighting too low on projector.
- Fresh fruits.
- More stories – they help you remember, and reinforce or remind us of the importance of what we do.
- More examples of violations and corrective actions.
- More exercises.
- More examples and actual enforcement scenarios.
- N/A
- More videos (2)
- Lighting is bad for PowerPoint's. Maybe use better colors or brighter screen. More on recognizing PCB era equipment.

- Provide the material (online) before the training so we can generate more discussion or more questions.
- Maybe better PowerPoint. Hard to see screen.
- Just right.

### **What topics would you recommend for a future workshop?**

- Go over more “Best Management Practices” so that we can educate further, and help to be more of a resource for helpful situations.
- Sampling of discharges/hydrocarbon filters.
- More videos and pictures.
- Specific examples and follow through on different kinds of violations.
- Where is the line? When does it become an illicit discharge? Emptying utility boxes? Washing cars without soap? Volume?
- You had a pretty good variety.

### **General Comments**

- Very well put together.
- Good food.
- Food (fruit) is bad, rancid. Bagel not as good.
- Please find a quality cater next time.
- Ask food team for help.
- Good job!
- Great video on spills from Seattle Public Works. Good to switch up presentation media and get us involved.
- It was better than last year.
- #2 presentation is very useful in a day to day.
- Great training.
- Thank you for providing food.

### CII Subcommittee Attendance – FY 2015/16

Name	Agency	E-Mail	Sept. 16th	March 16th	
Steve Tyler	City of Atherton	styler@ci.atherton.ca.us			
Bozhena Palatnik	City of Belmont	Bpalatnik@Belmont.gov			
John Tallitsch	City of Belmont	jtallitsch@belmont.gov			
Randy Breault	City of Brisbane	rbreault@ci.brisbane.ca.us	✓		
Keegan Black	City of Brisbane	kblack@ci.brisbane.ca.us			
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Kiley Kinnon	City of Burlingame	kiley.kinnon@veolia.com	✓		
Louis Gotelli	City of Colma	Louis.Gotelli@colma.ca.us			
Ward Donnelly	City of Daly City	wdonnelly@dalycity.org	✓		
Cynthia Royer	City of Daly City	croyer@dalycity.org			
Michele Daher	City of East Palo Alto	mdaher@cityofepa.org			
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Allan Shu	City of Foster City	ashu@fostercity.org			
Larry Carnahan	City of Half Moon Bay	larryc@hmbcity.com			
Mark Lander	City of Half Moon Bay	markl@csgengr.com	✓		
Ali Hatefi	Town of Hillsborough	ahatefi@HILLSBOROUGH.NET	✓		
Virginia Parks	City of Menlo Park	vkfparks@menlopark.org	✓		
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Mark Swenson	City of San Mateo	<a href="mailto:mswenson@cityofsanmateo.org">mswenson@cityofsanmateo.org</a>	✓		
Sven Edlund	City of San Mateo	sedlund@cityofsanmateo.org	✓		

Name	Agency	E-Mail	Sept. 16th	March 16 <sup>th</sup>	
Rob Lecel	South San Francisco	rob.lecel@ssf.net			
Andy Wemmer	South San Francisco	Andrew.wemmer@ssf.net	✓		
Kristen Font	South San Francisco				
	Town of Woodside				
Dermot Casey	County of San Mateo	<a href="mailto:djcasey@co.sanmateo.ca.us">djcasey@co.sanmateo.ca.us</a>			
Pat Ledesma	County of San Mateo	<a href="mailto:PLedesma@smcgov.org">PLedesma@smcgov.org</a>	✓		
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