



# **COMMERCIAL & INDUSTRIAL BUSINESS INSPECTION PLAN**



**June 2005**

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**INTRODUCTION**

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The Contra Costa Clean Water Program's (Program's) Stormwater Management Plan (Plan) is the mechanism used by Program co-permittees to implement its joint municipal National Pollutant Discharge Elimination System (NPDES) permit. The Plan includes a requirement that co-permittees prepare and utilize a written inspection plan to outline specific steps each municipality will take to conduct effective facility inspections (Performance Standard INSP-1). This model inspection plan (Inspection Plan) satisfies the performance standard and forms a basis for the City of Brentwood to conduct effective inspections within its jurisdiction. The City of Brentwood utilizes this model plan in conjunction with its stormwater ordinances to implement our stormwater inspection program.

The Program has made efforts to develop a comprehensive and coordinated inspection program for all co-permittees. This Inspection Plan describes many activities that are currently implemented.

**1.1 Goal of the Inspection Program**

The goal of the inspection program is to reduce pollutant and non-stormwater discharges to the stormdrain system from industrial and commercial businesses through facility inspections and education. To achieve this goal, a multi-faceted approach has been developed to include the following tasks:

1. Identify businesses with high potential to generate stormwater pollution.

2. Develop and implement a systematic inspection program.
3. Develop and distribute educational information to businesses about stormwater issues.
4. Develop an effective enforcement mechanism to achieve compliance with the local stormwater ordinance.
5. Implement a training program to create highly skilled inspectors capable of eliminating pollutants at the source.
6. Conduct focused outreach activities to targeted industrial and commercial sectors.
7. Prepare reports to document inspection activities.
8. Analyze trends and modify the Inspection Plan when necessary to improve the inspection program.

## **1.2 Inspection Program Organization**

Fifteen (15) Program co-permittees (Antioch, Clayton, Concord, Danville, El Cerrito, Lafayette, Martinez, Moraga, Oakley, Orinda, Pinole, Pittsburg, Pleasant Hill, San Ramon and Walnut Creek) contracts with the Central Contra Costa County Sanitary District (CCCSD), the East Bay Municipal Utility District (EBMUD), and the Delta Diablo Sanitation District (DDSD) to conduct stormwater inspections within their jurisdictions. The unincorporated County contracted with the Contra Costa County Hazardous Materials Division (County HazMat) to conduct stormwater inspections within its jurisdiction. The cities of Brentwood, Hercules, San Pablo and Richmond conduct stormwater inspections using their staff.

## **1.3 Ad hoc Industrial/Commercial Advisory Workgroup**

The Program established an ad hoc Industrial/Commercial Advisory Workgroup comprised of co-permittees and contracted agencies responsible for stormwater inspections. The workgroup is comprised of representatives from CCCSD, DDS, EBMUD, County HazMat, Brentwood, Concord, Hercules, San Pablo and Richmond. The workgroup's role is to assist in achieving consistency in inspections, to improve the inspection program, coordinate inspector training and outreach activities and develop educational information for business owners and operators. Recommendations and/or activities planned by the workgroup are reported to the Program's Management Committee by Program staff.

## IMPLEMENTATION OF THE INSPECTION PLAN

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This section provides the mechanism to implement the Inspection Plan.

### **2.1 Business Identification**

A countywide and regional analysis of businesses was conducted during the Program's first permit period (1993-1998). This effort identified a base-line universe of industrial and commercial businesses with high potential to cause stormwater pollution ("Identified/Targeted Business"). The City of Brentwood is to annually review its business license database by Standard Industrial Code (SIC), and/or POTW permitted facility databases, and/or Contra Costa County Watershed Program Clean Water Database, and/or Hazardous Materials Inspection Facility Database and Notice of Intent listings (NOI) to keep Identified/Targeted Business listings current and up-to-date.

### **2.2 Identified/Targeted Business Types and Inspection Frequency**

Business types identified as having high potential to cause stormwater pollution in the City of Brentwood's jurisdiction include manufacturing facilities, industrial facilities, food service facilities, vehicle service facilities, retail gas outlets, and nurseries. The City uses the Pollutants of Concern (POC) process to assist in evaluating the types of businesses identified as targeted for inspections under this program. Table 2-1 summarizes the business types with the potential to discharge POC's. The list of POC's is identified by the Program's Draft Pollutant's of Concern Pollution Prevention and

Control Measures Plan, December 2004. The City's goal is to inspect all Identified/Targeted Businesses within its jurisdiction at least once every five (5) years. Activities within the City of Brentwood, however, are currently very light with respect to manufacturing and industrial facilities. Table 2-2 describes specific business types that are subject to inspection at more frequent intervals based on several factors. These factors include, but are not limited to, high personnel turnover rates, facility location to sensitive water bodies, and high volume of potentially hazardous substances used on a regular basis.

### **2.3 Inspection Types**

Three types of inspections will be conducted – routine inspections, priority inspections and “call-out” inspections. “Routine” inspections are conducted at Identified/Targeted Businesses at a minimum of once every five (5) years. If a business shows evidence of active non-stormwater pollutant discharges during a routine inspection, it is subject to “priority” inspection at least once the following year after compliance is achieved. “Call-out” inspections are conducted as needed following reported or referred non-stormwater discharge or pollutant exposure. Table 2-2 describes the types of inspection that are performed.

### **2.4 Facility Inspections**

An inspector designated by the local agency will visit a business facility. The inspector will provide identification and review the business operation, maintenance and discharge practices with the on-site facility representative. The inspector will also conduct a visual inspection to evaluate potential pollutant and pollutant exposure impacts on the stormdrain system from the business. The following areas are inspected, at a minimum:

- A. Outdoor process/manufacturing areas;
- B. Outdoor material storage areas;
- C. Outdoor waste storage and disposal areas;
- D. Outdoor vehicle and heavy equipment storage and maintenance areas;
- E. Outdoor parking areas and access roads;
- F. Outdoor wash areas;
- G. Work practices from indoor areas that can either drain to outdoor areas (e.g.: hosing indoor floors) or be discharged to outside areas (e.g.: dumping mop water);
- H. Stormwater conveyance system maintenance;
- I. Emergency response practices (e.g.: hazardous waste spill response); and
- J. Other areas (such as loading and unloading facilities, warehouse facilities and rooftop downspouts).

If any problems or areas of concern are identified, the inspector will notify the facility representative and discuss potential solutions. If a stormwater violation is identified, the inspector will notify the facility representative in writing using one of the enforcement documents identified below. This enforcement document will also be used to instruct the representative to take corrective action and to establish a correction schedule to solve the problem or violation. If an active discharge is observed the inspector may collect samples and have them analyzed for appropriate parameters. The inspector may also take photographs to document violations and obtain copies of documents as needed to record the compliance status of the business with the City of Brentwood's stormwater ordinance. An exit interview is conducted with the facility representative following each inspection.

Individual inspections are documented using the Stormwater Inspection Report Form (Appendix 2-1) or its equivalent.

## **2.5 Education**

Inspectors distribute and discuss appropriate educational and BMP materials with the facility representative during an inspection. These materials will serve a dual purpose - to educate businesses and provide a narrative standard that may be utilized in cases where enforcement of ordinances is required. Distribution of educational materials is documented on the inspection form. Education of the City of Brentwood's stormwater management program is ongoing from the initial inspection through any potential enforcement actions.

## **2.6 Enforcement**

There are a variety of enforcement tools available to the City of Brentwood and/or its representatives to achieve and maintain commercial and industrial facility compliance with local stormwater ordinances. These include education, a Warning Notice/Pollutant Exposure Notice (WN/PEN), issuance of a Notice of Violation (NOV), and fines or referrals to other agencies of the District Attorney's office. Table 2-4 provides guidance for minimum procedures of compliance enforcement. Generally, these enforcement procedures are applied in escalating steps, although the City of Brentwood may skip steps, as appropriate in egregious cases. The level of evidence available influences the level of enforcement that can be taken as a result of a particular inspection. Any documents issued shall identify the applicable ordinance section violated, the corrective actions to be taken, and should have the business submit a formal response (when applicable). Table 2-4 continues on the next page to describe general enforcement procedures in the form of a flowchart.

Pollutant exposure, evidence of a historical pollutant discharge, or a stated business practice that has a potential to pollute the stormdrain system will result in issuance of a WN/PEN. The inspector and the facility representative will discuss the WN/PEN, appropriate BMPs or facility improvements and establish a schedule to eliminate the problem. Education is used to communicate a general understanding of the stormwater program and its purpose during inspection. The inspector may conduct one or more follow-up inspections to ensure compliance. Following compliance, the business will be scheduled for a routine inspection. If compliance is not achieved through the WN/PEN, the enforcement procedure will escalate to Level II.

*Level II Notice of Violation*

An active non-stormwater pollutant discharge that violates the local stormwater ordinance or a significant pollutant exposure that are identified during an inspection will result in issuance of a Notice of Violation (NOV). The inspector and facility representative will discuss the violation and potential solutions. A written notice will be issued requiring the condition to be abated immediately. If required, a remediation schedule will be approved by the inspector who will follow-up to ensure that the discharge has been terminated and the business practices that resulted in the discharge has been corrected. The inspector may also recommend implementation of appropriate best management practices (BMPs). Businesses that fail to comply with Level I enforcement procedures will also receive an NOV and be subject to timely corrective action and follow-up inspection. The City of Brentwood or authorized representative may also employ Cease and Desist Orders, Orders to Clean and Abate, Notice to Clean or any other similar notification outlined in the stormwater ordinance that identifies a problem, requires correction or abatement but does not assess fines.

Any business receiving a NOV will then be considered a Priority Business. As a Priority Business, the facility will be inspected at least once during the following year to ensure compliance with the local stormwater ordinance. If the facility is compliant, it will then be scheduled for a routine inspection.

*Level III Formal Enforcement (Administrative Penalties, Cost Recovery)*

An egregious violation of the local stormwater ordinance that cannot be resolved through the NOV or WN/PEN enforcement actions will initiate formal enforcement of the stormwater ordinance. Formal enforcement actions will result in penalties being assessed in the form of citations, agency cost-recovery, and/or formal negotiated settlement. Such actions will be coordinated by the City of Brentwood Stormwater Manager.

Business practices constituting gross violation include a pattern of non-compliance after issuance of NOV with repeat violations, failure to adequately address previous violations or notices, and/or directly discharging hazardous materials to the storm drain system. The City of Brentwood Stormwater Manager has the discretion to include any serious violation(s) as warranting this level of enforcement so long as there is documentation and/or evidence available to support this action.

*Level IV Legal Action and/or Referral to State and Federal Agencies*

Inadequate measures taken by facility manager(s) to satisfy Level III enforcement violations will result in the City of Brentwood Stormwater Manager referring the case to its city attorney or County District Attorney. If a serious stormwater violation that poses an imminent threat to human health and the environment is identified during an inspection, the City of Brentwood may refer the violation to qualified emergency response personnel, the District Attorney, the Regional Water Quality Control Board

(RWQCB), the California Department of Fish and Game and/or the U.S. Environmental Protection Agency.

## **2.7 Inspector Training**

The Program will conduct training and workshops on an on-going basis to ensure effective and consistent inspections throughout the county. This training may include presentations by industry representatives, inspectors from sister agencies and informational updates from stormwater inspectors at various agencies. Additional training on new regulations will be conducted as needed. The Program's training and workshops are planned and coordinated by the ad hoc Industrial/Commercial Advisory Workgroup. Inspectors may also attend in house training, regional conferences, etc., as appropriate to improve their skills.

## **2.8 Industry Outreach**

The City of Brentwood will conduct outreach activities to target businesses that are potential stormwater polluters and educate facility owners/operators about stormwater regulations and how stormwater pollution can be minimized. Such outreach activities may be conducted for individual businesses or a group of businesses. The City of Brentwood may also participate in Program activities that target specific industry groups. For example, the Program works with the Green Business Program that provides certification for businesses that comply with stormwater and other environmental regulations.

## **2.9 Reporting**

The City of Brentwood will report its inspection activities on an annual basis using the reporting form provided in Appendix 2-2 or its equivalent. This report will be included in the City of Brentwood Annual Report, which is submitted to the RWQCB, and will also be used to periodically evaluate the inspection program.

### 3 SUMMARY

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The goal of the stormwater inspection program is to reduce pollutants and non-stormwater discharges to the stormdrain system from industrial and commercial businesses through facility inspections and education. This Plan is used as a framework to implement the inspection program. If necessary, modifications to this Plan are made annually.

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**TABLE 2-1**  
**INSPECTION FREQUENCY BY BUSINESS TYPE**

<b>Inspection Frequency</b>				
<u><b>Business Type</b></u>	<u><b>Annual</b></u>	<u><b>1-2 Years</b></u>	<u><b>2-3 Years</b></u>	<u><b>5 Years</b></u>
Notice of Intent (NOI) Filers				
Community/Commercial Pools				
Priority Businesses				
[subset]				
[subset]				
Pretreatment Permitted Facilities				
Vehicle Service Facilities (General)				
Oil Change Shops				
Auto Body Shops				
Fleet Operations				
Retail Car Washes				
Autobody and Carwash Facility				
Food Service Facilities				
Fast Food Restaurants				
Full Service Food Restaurants				
Embedded Food Services (cafeteria, deli, etc.)				
Grocery Stores				
Retail Gas Outlets				
Plant Nurseries				
Golf Courses (Food/Vehicle Operations)				

**TABLE 2-1 (cont.)**  
**INSPECTION FREQUENCY BY BUSINESS TYPE**

Manufacturing Facilities				
Cement & Asphalt Batch Plants				
Corporation Yards				
Auto Dismantlers				
Special Study Areas/Projects				
Other				

**TABLE 2-2**  
**SUMMARY OF INSPECTION TYPES**

Contra Costa Clean Water Program

<b>Inspection Type</b>	<b>Minimum frequency</b>
"Routine" Inspection	Once every 5 years
"Priority" Inspection	Annually until compliance is achieved; then once every 5 years
"Call-out" Inspection	As needed

TABLE 2-3

MINIMUM ENFORCEMENT PROCEDURES

VIOLATION	ENFORCEMENT LEVEL			
	I Warning Notice	II Notice of Violation	III Formal/ Penalty	IV Legal Action
1) Failure to effectively apply Best Management Practices (BMPs) to minimize potential exposure of raw materials, products, equipment, waste materials, and work material storage and material handling areas to stormwater	XX			
2) Evidence of discharges present (stains, sludge, eroded concrete, etc.)	XX			
3) Stated practice of activity having potential to pollute stormwater system	XX			
4) Observed discharge of washwaters <sup>1</sup> to the storm drain system	XX			
5) Illicit connection to storm drainage system, such as a floor drain	XX			
6) First failure to correct violations 1-5		XX		
7) Failure of applicable facility to file a NOI <sup>2</sup>		XX		
8) Failure of applicable facility to have a SWPPP <sup>3</sup> , Monitoring Plan or Annual Monitoring Report		XX		
9) Discharge of small quantities <sup>4</sup> of pollutants that have reached the stormdrain system, creek, lagoon, marsh, or bay/delta		XX		
10) Visible pollutants present in stormwater runoff (during wet weather) such as oil sheen or litter		XX		
11) Second failure to correct violations 1-6. First failure to correct violations 7-10			XX	
12) Discharge of large quantities of pollutants that have reached the stormdrain system, creek, lagoon, marsh, or bay/delta			XX	
13) Industrial process wastewaters or sanitary sewage discharged into storm drainage system			XX	
14) Failure to correct violations that resulted in Level III Enforcement				XX

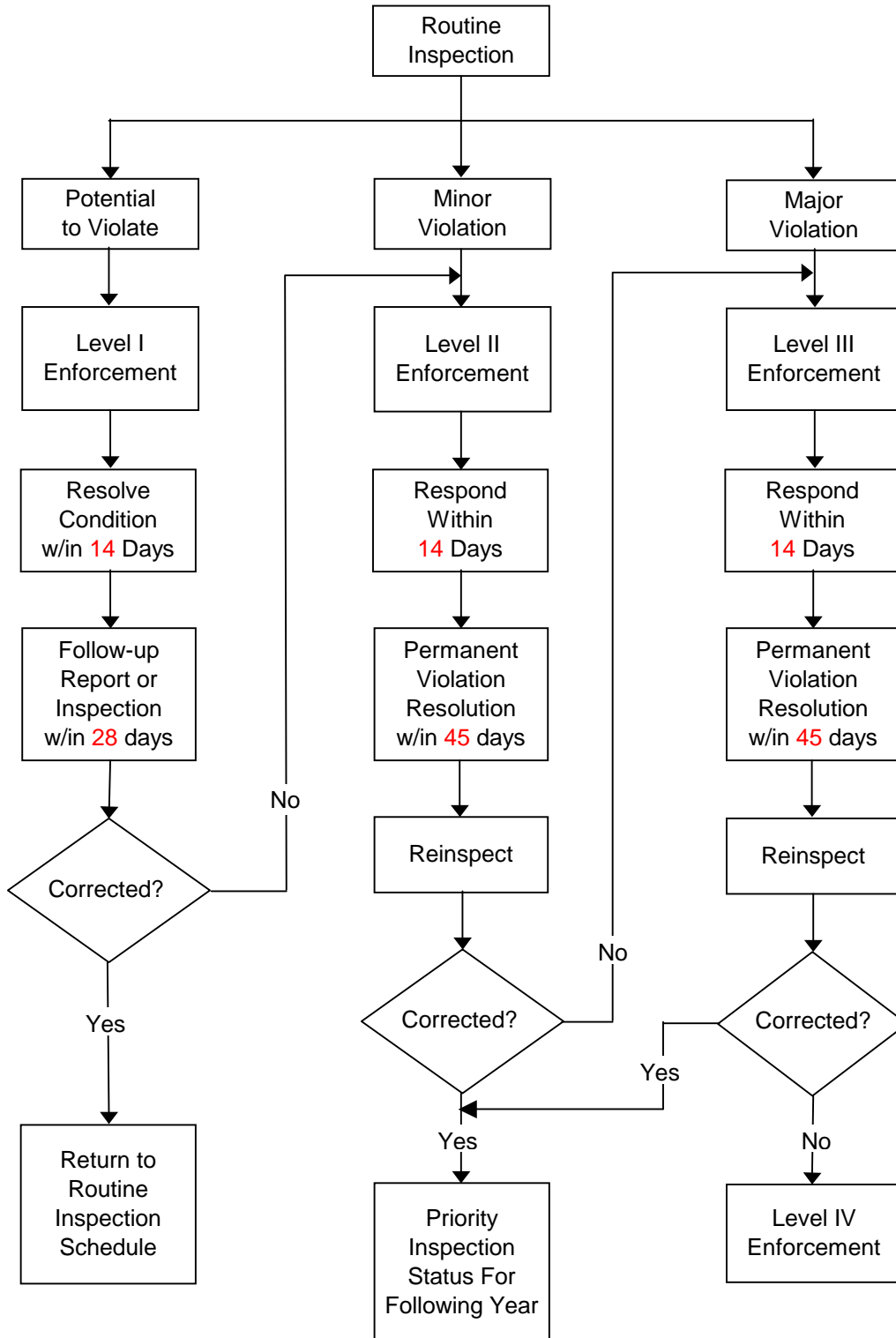
<sup>1</sup> Washwater includes wastewater from 1) business washing of vehicles, equipment (including buckets, mats, and utensils), parking lots, or sidewalks, 2) mobile cleaners/steamers/rug cleaners, 3) high pressure hosing for painting preparation, and 4) any other types of washing

<sup>2</sup> Facilities required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Industrial Activities

<sup>3</sup> Stormwater Pollution Prevention Plan

<sup>4</sup> Small quantities defined as less than 1-gallon for liquid materials based on RWQCB's Enforcement Policy's "ACL Ticket-Violation Categories"

**Table 2-3 (cont.)  
Model Enforcement Flowchart**



APPENDIX 2-1

**Stormwater Inspection Report**

<b>Inspection date</b>

<b>Facility name</b>	<b>Site address</b>	<b>City</b>	<b>Zip code</b>

<b>Primary contact name and title</b>	<b>Phone number</b>	<b>Inspector name</b>

<b>Secondary contact name and title</b>	<b>Phone number</b>	<b>Inspector name</b>

<b>Property owner</b>	<b>Mailing address</b>	<b>City</b>	<b>Zip code</b>


<b>City permit number</b>	<b>SIC code</b>	<b>Parcel #</b>	<b>Stormwater facility type</b>
			<input type="checkbox"/> Residential <input type="checkbox"/> Restaurant <input type="checkbox"/> Vehicle Service Facility <input type="checkbox"/> Other (see below)
<b># of employees</b>	<b>Days of operation</b>	<b>Hours of operation</b>	

<b>Type of business or operation / major activity</b>

<b>Inspection type</b>	<b>Enforcement action</b>	<b>#</b>	<b>Follow-up inspection required?</b>
<input type="checkbox"/> Routine	<input type="checkbox"/> Warning Notice		<input type="checkbox"/> Yes <input type="checkbox"/> No

			<table border="1"> <tr> <th>Sample collected?</th> <th>Sample no.</th> </tr> <tr> <td><input type="checkbox"/> Yes   <input type="checkbox"/> No</td> <td></td> </tr> </table>	Sample collected?	Sample no.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Sample collected?	Sample no.						
<input type="checkbox"/> Yes <input type="checkbox"/> No							

**Site Map (optional): Sketch inspection site showing major site features, e.g.; buildings, outdoor storage areas, storm drain inlets, creeks, illicit discharge / connection location, etc.**



**Initial observations / changes since last inspection:**



**Stormwater Permit Status (choose one only):**

Facility has filed NOI. WDID # \_\_\_\_\_  
Does the facility have a SWPPP?

Yes     No     Refer to  
RWQCB

If yes: Is the SWPPP being implemented?  
Is self-monitoring being implemented?

Yes     No  
 Yes     No  
 Yes     No

Has the facility self-certified no exposure?

- Facility is not covered and does not appear to need coverage.
- Facility not covered but may require coverage.
- Facility has an individual NPDES permit.

Permit # \_\_\_\_\_

**Stormwater Inspection:**

<b>Illicit connections discovered? If Yes, describe under Deficiencies / Observations</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
---	--

Areas of Activity	N/A	BMPs				Pollutant exposure	Illicit discharge	Deficiencies / Observations  Enter code for Pollutant Type in boxes below and briefly describe. (Additional space on back page)
		Any in place?		Appear Effective?				
		Yes	No	Yes	No			
a. floor cleaning								<input type="checkbox"/> <input type="checkbox"/>
b. equipment cleaning								<input type="checkbox"/> <input type="checkbox"/>
c. manufacturing, residues and spills								<input type="checkbox"/> <input type="checkbox"/>
<b>OUTDOORS</b>								
a. outdoor process/mfg areas								<input type="checkbox"/> <input type="checkbox"/>
b. outdoor material storage areas								<input type="checkbox"/> <input type="checkbox"/>
c. outdoor waste storage/disposal areas								<input type="checkbox"/> <input type="checkbox"/>
d. outdoor vehicle and heavy equipment storage, maintenance areas								<input type="checkbox"/> <input type="checkbox"/>

e. outdoor parking areas and access roads									<input type="checkbox"/>	<input type="checkbox"/>
---	--	--	--	--	--	--	--	--	--------------------------	--------------------------

Areas of Activity	N/A	BMPs				Pollutant exposure	Illicit discharge	Deficiencies / Observations Enter code for Pollutant Type in boxes below and briefly describe. (Additional space on back page)	
		Any in place?		Appear Effective?					
		Yes	No	Yes	No				
f. outdoor wash areas								<input type="checkbox"/>	<input type="checkbox"/>
g. outdoor drainage from indoor areas								<input type="checkbox"/>	<input type="checkbox"/>
h. other (describe)								<input type="checkbox"/>	<input type="checkbox"/>

**Pollutant Type:** (enter number in boxes above - use more than one code if necessary)

- |                           |                      |                                |
|---------------------------|----------------------|--------------------------------|
| 1. Construction materials | 4. Automotive fluids | 7. Yard waste                  |
| 2. Sewage                 | 5. Fuels             | 8. Litter                      |
| 3. Food waste             | 6. Hazardous waste   | 9. Other (specify next to box) |

<b>Additional Deficiencies / Observations:</b>

<b>Educational materials distributed:</b>
---

**Quantity Type**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**APPENDIX 2-1(cont.)**

**Instructions for completing the Contra Costa Clean Water Program  
Stormwater Inspection Report  
Revised March 31, 2004**

Inspection Report Field	Instructions
Inspection Date	Write the date of the inspection.
Facility Name	Write the name of the facility.
Site Address	Write the street address of the site.
City	Write the city the site is located.
Zip Code	Write the zip code of the site.
Primary contact name and title	Write the name and title of the primary contact at the site.
Phone number	Write the phone number of the primary contact.
Inspector name	Write the name of the inspector that met with the primary contact.
Secondary contact name and title	If applicable, write the name and title of a secondary contact at the site. Secondary contact is the contact person when the primary contact is not available
Phone number	Write the phone number of the secondary contact.
Inspector name	If applicable, write the name of a second inspector that met with <i>either</i> contact persons.
Property owner	If different from the primary or secondary contact person, write the name of the property owner. OR indicate whether the property owner is either the primary or secondary contact.
Mailing address, City, Zip code	Write the mailing address, city, and zip code of the property owner if different from the site address.
City Permit number	To be used by city staff to indicate a permit number such as a business license, etc.
SIC code (two fields)	Write the SIC code(s) that best describes the <i>activities</i> conducted at the site.
Parcel #	Write the county assessor's parcel number of the site.
# of employees	Write the total number (or range) of employees that work at the site.
Days of operation	Write the days (Sunday through Saturday) the site is in operation.
Hours of operation	Write the range of hours the site is in operation; include <i>all</i> shifts.
Stormwater facility type	Check <i>one</i> of the following boxes:
Residential	- the site of the inspection is residential (in response to an illicit discharge investigation or call-out)
Restaurant	- the site is a food service facility <sup>1</sup> or restaurant
Vehicle Service Facility	- the site is a vehicle service facility
Other (see below)	- the site is not one of the other three previous selections; describe the type of business in the "Type of business or operation / major activity" field below

<sup>1</sup> This can include other commercial facilities that also provide food service (e.g. hotel).

**Instructions for completing the CCCWP Stormwater Inspection Report (continued)**

Inspection Report Field	Instructions
Type of business or operation / major activity	Describe the business activity (if not residential, vehicle service, or a restaurant).
Inspection type	Check <i>one</i> of the following boxes:
Routine	- the inspection is the routine, regularly scheduled inspection
Investigation / call-out	- the inspection is in response to an illicit discharge report or referral call (from the public, another agency, another department, etc.)
Compliance verification	- the inspection is a follow-up to confirm the site's progress since the last inspection
Enforcement follow-up (1-year)	- the inspection is the next year follow-up at a site with enforcement activities during the last inspection
Enforcement action	Check <i>all</i> of the boxes that apply:
Warning Notice	- the site is issued a Warning Notice
Notice of Violation	- the site is issued a Notice of Violation
Referral Notice (note referral agency)	- the inspection report or a separate referral notice should be referred to another regulatory agency (e.g., Regional Board, POTW, HazMat, Fire Department, etc.) Note the primary referral agency.
#	Indicate the number that identifies the enforcement action.
Follow-up inspection required?	Check whether or not a follow-up inspection is required. Enforcement follow-up is documented on the Warning Notice or Notice of Violation.
Sample collected?	Check whether or not a sample was taken. (e.g., stormwater discharge, process discharge, an unidentified non-stormwater discharge)
Sample no.	Describe the identifying sample number for future reference.
Initial observations / changes since last inspection	Indicate whether there have been any changes to the site's status of compliance since the last inspection. For example, if this is a follow-up inspection, were the BMPs effective? Were the requirements implemented? has the facility achieved compliance? Write any comments, notes, observations, or recommendations.
Site map	This is optional but could be used to record the map site features. Recording the location of illicit connections (if known) may be useful for follow-up inspections.

**Instructions for completing the CCCWP Stormwater Inspection Report (continued)**

Inspection Report Field	Instructions
Stormwater Permit Status	Check <i>one</i> of the following boxes:
	Facility has filed NOI. - the site has submitted a Notice of Intent (NOI) to comply with the California Industrial General Permit See <i>Additional Instructions on NOI Facilities</i> below.
	Facility is not covered and does not appear to need coverage. - the facility <u>does not</u> appear to fit under one of the eleven industrial categories that must obtain coverage under a permit for stormwater discharges
	Facility is not covered but may require coverage. - the facility <u>does</u> appear to fit under one of the eleven industrial categories that must obtain coverage under a permit for stormwater discharges; AND - has not filed a NOI or obtained coverage under an individual permit Check “Yes” in “Referral to RWQCB” below.
	Facility has an individual NPDES permit; Permit # <sup>2</sup> - the facility has obtained an individual stormwater permit write the permit number.
Referral to RWQCB?	Check whether or not the stormwater inspection report should be forwarded to Regional Board staff.
<b><i>Additional Instructions on NOI Facilities</i></b> <sup>3</sup> - <i>If the facility has filed a NOI, complete the following:</i>	
WDID# <sup>2</sup>	Write the waste discharger identification number (WDID). The WDID appears at the top of all correspondence from the State or Regional Boards (e.g., annual report forms, invoice for annual permit fee).
Does the facility have a SWPPP?	Indicate whether or not the facility has developed a SWPPP. If the facility does not have a SWPPP, check “Yes” in “Referral to RWQCB” below.
If yes: (the facility has a SWPPP)	Answer <i>both</i> of the following questions:
	Is the SWPPP being implemented? Indicate whether or not the facility is <i>implementing</i> its SWPPP. If the facility does not implement its SWPPP, check “Yes” in “Referral to RWQCB” below. Briefly describe in “Additional Observations / Notes” which portion of the SWPPP the facility does not implement.
	Is self-monitoring being implemented? Indicate whether or not the facility conducts self-monitoring. Self-monitoring includes: non-stormwater discharge visual observations; stormwater visual observations; and stormwater sampling. Only check “Yes” if facility conducts <u>all three</u> parts of the self-monitoring. If the facility does not conduct any part of the self-monitoring, check “Yes” in “Referral to RWQCB” below. Describe in “Additional Observations / Notes” which self-monitoring component the facility does not implement.
Has the facility self certified no exposure?	Indicate whether or not the facility has applied for a stormwater sampling exemption by certifying the facility has no pollutant exposure to stormwater.

<sup>2</sup> The inspector can request the site contact telephone the inspector with the WDID or permit number within a certain time period.

<sup>3</sup> Note the CCCWP inspector has no legal authority to enforce the Industrial General Permit. The coordination of information between the CCCWP and Regional Board staff on NOI facilities are currently under development. These instructions provide guidance but may change at a later date.

**Instructions for completing the CCCWP Stormwater Inspection Report (continued)**

<b>Inspection Report Field</b>		<b>Instructions</b>
Illicit connections discovered?		Check Yes or No depending on whether an illicit connection to the storm drain was discovered. Further descriptive information should be included in Deficiencies / Observations.
Indoor/Outdoor Areas of Activity		Respond to each activity area listed. Either check “N/A” or complete the “BMP” and “Type of Discharge” information.
	N/A - Not Applicable	Check box if the site does not have that activity area. Go to the next activity area. OR Check box if there is no reasonable potential for pollutant discharge to the storm drains from this area. Go to the next activity area.
	Best Management Practice - BMP	For each activity area at the site, answer the first question (“In Place?”). Answer the second question (“Effective?”) only if the answer to the first question is “Yes”.
	In place?	- Does the facility appear to implement BMPs that prevent pollutant discharge to stormwater? Check “Yes” or “No”.
	Appear effective?	- If the facility does implement BMPs, do the BMPs appear to be effective at preventing pollutant discharge to stormwater? Check “Yes” or “No”.
	Type of Discharge	Describe the type(s) of pollutant discharge from each applicable activity area.
	Pollutant exposure	Check if the activity may lead to a pollutant discharge to the storm drain because pollutants are exposed to stormwater runoff.
	Illicit discharge	Check if the pollutant discharge to the storm drain is a non-stormwater discharge which is not exempted by ordinance. <sup>4</sup> Indicate under Deficiencies / Observations whether or not the non-stormwater discharge was occurring at the time of the inspection.
Deficiencies / Observations <i>and</i> Additional Deficiencies / Observations		Continue any comments from “Initial observations / changes since last inspection” field from page 1. Write any deficiencies noted, comments, notes, observations, recommendations. Indicate the pollutant type in the box.
Educational materials distributed		Indicate the quantity and type (title) of the educational materials given out during the inspection.

<sup>4</sup> *Non-stormwater discharges which are conditionally exempted (please refer to the NPDES permit for specific criteria) include: discharges in compliance with an NPDES permit; properly managed water line flushing and other discharges from potable water sources; landscape irrigation and lawn watering; irrigation water; diverted stream flows; groundwater infiltration to storm drains; uncontaminated pumped groundwater percolation and footing drains; water from crawl space sumps; air conditioning condensate; springs; individual residential car washing; flows from riparian habitats and wetlands; dechlorinated swimming pool discharges; and flows from firefighting.*

**APPENDIX 2-2**  
**ANNUAL INSPECTION REPORTING FORM**  
**Contra Costa Clean Water Program**

Description	Industrial/ NOI	Commercial			Misc. <sup>(2)</sup>	Total
		Restaurants	Vehicle Service Facility	Other <sup>(1)</sup>		
<b>INSPECTION SUMMARY</b>						
Number of Facilities scheduled for Inspection						
Number of Facilities Inspected						
Number of Routine Facility Inspections						
Number of Priority Facility Inspections						
Number of Call-out Inspections						
Number of Follow up Inspections						
<b>ENFORCEMENT</b>						
Total Number of Enforcement Actions						
Number of Notices of Violation (NOV) Issued						
Number of Warning/Pollutant Exposure Notices (WN/PEN) issued						
Number of Fines Levied						

Description	Industrial/ NOI	Commercial			Misc. <sup>(2)</sup>	Total
		Restaurants	Vehicle Service Facility	Other <sup>(1)</sup>		
Number of Referrals						
<b>BUSINESS EDUCATION &amp; OUTREACH</b>						
Number of Educational Materials Distributed						
<b>INSPECTOR TRAINING</b>						
Number of Inspector Training Sessions						
Number of Inspectors Trained						

(1) Nursery, golf course, grocery, retail gas outlet

(2) Mobile surface cleaners, corporation yards, contractor's yards, call out to residential