

CITY OF BRENTWOOD MUNICIPAL SUMMARY

2003/2004 ANNUAL REPORT

New Development and Construction Controls

The City of Brentwood has issued 34 grading permits and 26 encroachment permits to begin construction on major projects, as well as 1,958 building permits during FY 2003/04. The City has awarded 5 contracts for capital improvement construction projects during the same reporting period. During the course of the reporting period there were 39 ongoing projects which required proof of coverage under the State's General Construction Permit. These ongoing projects, in some cases, have continued activities from the previous reporting period, while others, issued permits during this reporting period, will have SWPPP activities documented during the following reporting period. In addition, the projects requiring proof of coverage, in many cases, required both a grading and encroachment permit.

Code Enforcement personnel issued 37 Notices of Violation, 46 citations and 68 notices to comply out of 356 inspections and 548 follow-up inspections for both new residential and commercial projects for stormwater violations during FY 2003/04.

As indicated in the previous annual report, the first citation carries a \$100 fine, \$250 for the second occurrence and \$500 for the third violation. City policy is to issue the citation to the developer of the property. Therefore, citations issued because of stormwater violations caused by three separate sub-contractors on the same project result in fines to the developer totaling \$850. Each subsequent violation on that project would be fined \$500. It is our belief that it is the developer's responsibility to adequately train and supervise their sub-contractors. Receiving fines for violations caused by their sub-contractors has been an effective tool to encourage the developers to train and supervise construction on their projects.

The city is experiencing an increased demand for commercial development as demonstrated by the number of applications receiving discretionary approval during the report period. Conditions of approval were placed on these projects requiring the installation of pre-treatment controls for stormwater run-off prior to discharging into a public drainage facility. These control measures have included fossil filters, deflection screens, gravity separators and vegetative swales. To date, 23 structural pre-treatment facilities have been constructed for commercial or residential projects. The City requires the developer to ensure maintenance on private facilities as recommended by the manufacturer to prevent further degradation of water quality.

The City of Brentwood Public Works Department will be responsible for the City of Brentwood's stormwater treatment BMP operation and maintenance verification program. As all of these units have been installed only recently, the operation and maintenance verification program will be developed as the warranty periods for installation of these units expire. Initially all, all structural BMP's will be plotted and stored in the City of Brentwood's GIS Intranet Map Room, with links to the location, type, size, model, depth, installation date, warranty expiration date and scheduled maintenance. The City Public Works Department is currently evaluating its staffing

**ILLICIT DISCHARGE CONTROL ACTIVITIES
PERFORMANCE STANDARDS (PSs)**

ILLICIT DISCHARGE CONTROL ACTIVITIES

PERFORMANCE STANDARDS (PSs)

Municipality: City of Brentwood

Permit Year: Five (2003/2004)

Qualitative Results – Illicit Discharge Control Activities PSs

Introduction:

The City of Brentwood is continuing to expand code enforcement efforts and authority. The City currently has one code enforcement officer 50% dedicated to storm water pollution prevention. Cooperation between departments has resulted in identification, containment and clean-up of illicit discharges in time to prevent the effluent from reaching any of the local creeks.

The number of staff that are responsible for implementation of the Illicit Discharge Control Activities Performance Standards includes at least 2 Public Works and 1 Code Enforcement personnel.

The revised Group Program model Illicit Discharge Control Plan and amended Performance Standards is provided in Volume I, Section 7 of the Group Activities Report. While the City of Brentwood's Illicit Discharge Control Activities Plan has not been fully implemented, the City has made great strides in prevention, identification, awareness and enforcement. With the City now experiencing the bulk of its growth, implementation of controls is coinciding with the this growth curve rather than being in the position of playing catch-up, as would be the case in a city that is at or near its build out.

Implementation & Evaluation:

The engineering department has compiled GIS data accurately reflecting the location of most public improvements. New developments are required to submit electronic data reflecting locations of all infrastructure including, but not limited to, roads, sidewalks, fire hydrants, street lights, sewer, water and storm drain locations. This allows the mapping division to keep the maps current. All storm drains 18" diameter and above have been incorporated into our GIS system upon acceptance. In addition, all structural pre-treatment units will begin to be incorporated upon acceptance of the associated project.

Several meetings have been held with engineering, police, public works and code enforcement staff to identify a process that is comprehensive and can be implemented. Purchase of an intra-net server will allow central tracking of all incidents of illicit discharge as well as being able to map the locations for identifying hot spots throughout the city.

During the reporting period, the City of Brentwood Police Department, in cooperation with Public Works staff, fielded three call-in incidents of hazardous material discharges either in the public roadway, storm drain or in a private parking lot. The County Hazardous Materials Program team was dispatched in each case to evaluate, contain, clean up and report the incident. Attached is a sample copy of the incident report, included as ***Attachment "I"***.

Modifications:

The City of Brentwood now has a Code Enforcement Officer assigned 50% of the time solely to inspection, prevention, enforcement, tracking and follow-up of illicit discharges and related activities.

Fiscal Year 2004/2005 Goals:

All City of Brentwood staff will be trained and/or provided with literature to identify and report inadequate pollution prevention measures, activities which can result in illicit discharges, actual illicit discharges and pollutants traditionally not considered as illicit such as grass clippings or other organic material. The City of Brentwood is in the process of finalizing a written procedure for the routing and follow-up of all calls relating to stormwater violations or illicit dumping incidents.

Performance Standard Status – Illicit Discharge Control Activities PSs

| PS# | Description | Status | | | Evaluation ² | | |
|--|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| DEVELOP AN ILLICIT DISCHARGE CONTROL INSPECTION PROGRAM | | | | | | | |
| IDCA-1 | <p>Prepare a written Illicit Discharge Control Plan (Plan) that demonstrates the agency's commitment to conducting effective proactive and reactive investigation, tracking, and elimination of illicit discharges, and describes the level of effort for conducting these activities in the following fiscal year. The plan will demonstrate that the agency has:</p> <p>Proactive: Field Screening</p> <p>A. Identified, verified and prioritized field screening areas for investigation and/or repeat inspections;</p> <p>B. Developed a schedule for conducting investigations of the high priority areas during the coming year;</p> <p>C. Selected which agency or group will conduct the field screening activities and estimated the number of labor hours required to implement the program;</p> <p>D. Determined how the illicit discharge investigations will be implemented;</p> <p>Reactive: Spill Response Procedures</p> <p>E. Developed and implemented spill response protocols and procedures describing the role of each involved agency;</p> <p>F. Developed spill responsibility flowcharts by common spill type outlining agency procedures including enforcement and follow-up;</p> <p>G. Developed spill responder phone lists, updated as needed, identifying primary and back-up agency contacts during normal working hours, after-hours, and holiday coverage;</p> <p>H. Determined how the illicit discharge investigations will be implemented;</p> <p>Proactive & Reactive Reporting, Follow-up, and Enforcement</p> <p>I. Established how activities will be documented (e.g., by including sample inspection forms);</p> <p>J. Adopted minimum enforcement procedures;</p> <p>K. Developed procedures for follow-up enforcement or referral to another agency, including appropriate time periods for action; and,</p> <p>L. Demonstrated proper legal authority.</p> | X | | | X | | |

| PS# | Description | Status | | | Evaluation ² | | |
|---|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| IDCA-2 | Provide inspectors and appropriate staff with annual training to develop the knowledge and skills necessary to conduct effective proactive and reactive field investigations, with guidance from the Program and the Regional Board staff. Provide field crews and inspectors with updated spill responsibility flowcharts and phone lists. | X | | | X | | |
| IDCA-3 | The Plan will include an evaluation of the illicit discharge inspection results from the previous year and an assessment detailing which types of non-stormwater discharges were most prevalent. Adjust plan, as appropriate | X | | | X | | |
| PROACTIVE: FIELD SCREENING PROGRAM | | | | | | | |
| IDCA-4 | Develop or obtain accurate maps of the agency's storm drain system, including major drain segments, reaches, and outfalls. | X | | | X | | |
| IDCA-5 | Survey priority areas at least once per year. | X | | | X | | |
| IDCA-6 | Expand the illicit discharge inspection program to include medium or low priority field screening sites until the entire drainage area within the jurisdiction has been inspected once. | X | | | X | | |
| IDCA-7 | Determine the appropriate frequency for repeat inspections of medium and low priority areas based on an investigation of the agency's entire drainage area. | X | | | X | | |
| IDCA-8 | Utilize electronic information where appropriate on significant storm drainage facilities and screening points to track illicit discharges from neighboring jurisdictions which may enter the agency's storm drain system. | X | | | X | | |

| PS# | Description | Status | | | Evaluation ² | | |
|---|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| IDCA-9 | <p>Conduct field-screening investigations, which includes inspecting portions of the agency's storm drain system for potential sources of illicit discharges. Inspectors will:</p> <p>A. Survey priority areas, make observations, record observed or suspected dry weather flows.</p> <p>B. When possible, attempt to determine the type of flow and try to trace the flow to its source by following storm drain maps, inspecting manholes, and making surface observations. Record findings.</p> <p>C. If the responsible party is identified, educate the party on the impacts of their actions, explain the stormwater requirements, and provide BMPs, as appropriate. Initiate follow-up and/or enforcement procedures, if applicable. Record activities.</p> | X | | | X | | |
| REACTIVE: INVESTIGATE SPILL REPORTS/COMPLAINTS | | | | | | | |
| IDCA-10 | Inspectors investigate spill reports and/or complaints within their jurisdiction and record their activities. | X | | | X | | |
| IDCA-11 | Inspectors are familiar with the existing spill response and clean-up programs that cover the agency's jurisdiction, and coordinate illicit discharge program activities with these existing programs. This coordination will include annual correspondence and provision of updated spill responsibility flowcharts and phone lists to appropriate local and neighboring agencies. | X | | | X | | |
| IDCA-12 | Through internal communication and public education, encourage the use of "911" to report large or hazardous spills. If the use of the "911" is not appropriate, establish and publicize an alternative telephone number for reporting spills. | X | | | X | | |
| IDCA-13 | Establish a mechanism for obtaining information about spill incidents so that source identification and follow-up actions can be conducted. | X | | | X | | |
| IDCA-14 | Identify an appropriate role for participation in spill response drills, and ensure that adequate spill response supplies are available. | X | | | X | | |

| PS# | Description | Status | | | Evaluation ² | | |
|--|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| FOLLOW-UP, ENFORCEMENT, AND REPORTING | | | | | | | |
| IDCA-15 | <p>If a discharge is traced to a residential source, inspectors will conduct the following activities or coordinate the following activities with the appropriate agency:</p> <p>A. Continue inspection and follow-up activities until compliance is achieved. Record activities.</p> <p>B. Meet with the responsible party to discuss methods of eliminating the illicit discharge, including disposal options, recycling and possible discharge to the sanitary sewer, as appropriate. Provide Program information to the responsible party.</p> <p>C. Begin enforcement procedures, if appropriate.</p> | X | | | X | | |
| IDCA-16 | Provide inspectors with sufficient authority to initiate enforcement procedures. | X | | | X | | |
| IDCA-17 | Develop criteria for initiating enforcement actions. The criteria will be developed in conjunction with the Program to help ensure enforcement actions are conducted consistently throughout the county. | X | | | X | | |
| IDCA-18 | Summarize field investigations, and enforcement and follow-up activities in the Annual Report. | X | | | X | | |
| IDCA-19 | Document the number and types of spill incidents reported and responded to. (Agencies do not need to document or report automotive fluid spills.) This information is incorporated in the Annual Report submitted to the Regional Board. | X | | | X | | |
| IDCA-20 | Consider implementing a pilot program of a computerized data management system for managing and tracking information collected during field investigations and follow-up activities. Information would be linked through a data management system to storm drain and area maps through a GIS or other system to improve coordination and efficiency of future activities. | X | | | X | | |

1. A performance standard is "Modified" if: (a) it was or will be deleted; (b) the language or content of the performance standard was or will be changed; and/or (c) the implementation schedule for the performance standard was or will be changed.

An explanation of how the performance standard was or will be "Modified" is provided in the Qualitative Results form. The implementation status is provided in the "Modified Performance Standards" form.

2. An evaluation of the PSS' effectiveness is provided in the Qualitative Results form.

Quantitative Results – Illicit Discharge Control Activities PSs

| <i>Description</i> | <i>Industrial Areas</i> | <i>Commercial Areas</i> | <i>Residential Areas</i> | <i>Total</i> |
|--|-------------------------|-------------------------|--------------------------|--------------|
| Field Screenings | | | | |
| Total number of field screening areas identified within the Agency's entire drainage area. | | | | |
| Total number of field screening areas identified in the Annual Illicit Discharge Control Plan. | | | | |
| Number of priority field screening areas inspected. | | | | |
| Number of medium and low priority areas inspected. | | | | |
| Number of illicit connections/illegal discharges eliminated. | | | | |
| Number of incidents that involved removal of the following materials | | | | |
| Construction materials/debris | | | | 1 |
| Sewage | | | | |
| Food wastes | | | | |
| Automotive fluids | | | | 2 |
| Yard wastes | | | | |
| Other | | | | |
| Other | | | | |
| Enforcement Activities | | | | |
| Number of Enforcement Actions Taken | | | | |
| Written corrective measures | | | | 3 |

| <i>Description</i> | <i>Industrial Areas</i> | <i>Commercial Areas</i> | <i>Residential Areas</i> | <i>Total</i> |
|--|-------------------------|-------------------------|--------------------------|--------------|
| Notices to comply | | | | |
| Stop work orders | | | | |
| Notices of violation | | 9 | 35 | 44 |
| Fines | | 5 | 50 | 55 |
| Other | | | | |
| Number of enforcement referrals (e.g., to code enforcement, City or District Attorney, other agencies, Regional Board, etc.) | | 22 | 146 | 168 |
| Education/Outreach Activities | | | | |
| Number of illicit discharge control education materials distributed. | | | | |
| Number of employees attending illicit discharge control training workshops. | | | | 4 |

**MUNICIPAL MAINTENANCE
PERFORMANCE STANDARDS (PSs)**

MUNICIPAL MAINTENANCE
PERFORMANCE STANDARDS (PSs)

Municipality: City of Brentwood

Permit Year: Five (2003/2004)

Qualitative Results – Municipal Maintenance PSs

Introduction:

The City of Brentwood's Public Works department is responsible for maintenance of the roads and storm drain system. The City of Brentwood also has enterprise funds that are responsible for solid waste collection, wastewater treatment and potable water distribution.

Implementation & Evaluation:

The Public Works department mechanically sweeps each curbed street weekly. Heavily traveled bike paths and vehicular thoroughfares are often swept twice a week. Additionally, every catch basin and culvert within our jurisdiction is cleaned annually. During the reporting period, the City Public Works Department swept at least 18,424 miles of curbed street accounting for 1,982 cubic yards of material prevented from entering the City's storm drain system, including 385 pounds of copper, 385 pounds of lead, 14,131 pounds of total petroleum hydrocarbons and 3,212 tons of sediment. Due to the high volume of construction activity within the City and its outskirts, additional mechanical sweeping was performed in the public right-of-way and within private developments that drain into the City's storm drain system at various intervals. The number of publicly owner storm drain facilities inspected and cleaned by the Public Works Department includes 3,175 inlets, 38 culverts, 10 V-ditches and 1 pump station accounting for 743 cy of material removed from inlets, 318 cy from culverts and 32 cy from V-ditches, with 163 pounds of copper, 333 pounds of lead and 5,883 pounds of total petroleum hydrocarbons removed. In addition, there were 52 maintenance inspections of pump stations during the reporting period.

The City of Brentwood operates a 4.5 mgd wastewater treatment plant (WWTP) under Order No. 5-00-171 NPDES No. CA0082660. This order requires the construction and use of a reclaimed water system. The non-potable water supply system is 100% complete. Currently, the non-potable source is raw water pumped in from the Delta and purchased from the East Contra Costa Irrigation District. The City is currently utilizing this water supply to irrigate turf and landscaping in parks and in roadway parkway areas. Golf courses within the City, as well as the Roddy Ranch Golf Course in unincorporated Contra Cost County, are also currently utilizing this water supply for irrigation purposes. The City is waiting on a permit to utilize the reclaimed water directly from the wastewater treatment plant for parks and landscaping in the public right-of-way. Issuance of this permit is expected by September, 2004.

The City is implementing performance standard MUNI-89 by requiring developers and Capital Improvement projects to stencil the legend "No Dumping Drains to Creek" on 100% of all newly constructed catch basins. See *City of Brentwood Standard Conditions of Approval for Tentative Subdivision Maps*, Item No. 12 and for *Commercial and Industrial Projects*, Item No. 35, included as **Attachment "J"**, and *Requirement Prior to Issuance of Building Permit* checklist for developers, included as **Attachment "K"**.

Modifications:

Fiscal Year 2004/2005 Goals:

The City of Brentwood will be fully implementing the construction debris recycling program during FY 2003/04.

Performance Standard Status – Municipal Maintenance PSs

| PS # | Description | Status | | | Evaluation ² | | |
|--|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| STREET CLEANING FREQUENCY | | | | | | | |
| MUNI-1 | Sweep curbed streets on at least a monthly average <i>unless an alternative schedule is approved as described in MUNI-2</i> . In calculating this average, the number of curb miles swept in a fiscal year divided by the number of curb miles within an agency will equal twelve or greater. | X | | | X | | |
| MUNI-2 ^a | If sweeping streets less than on a monthly average, the rationale for the alternative standard must be described in a written action plan. The rationale should demonstrate the alternative schedule is equivalent in terms of protecting water quality as the annual average sweeping. The action plan will be submitted to the Regional Board as part of the Annual Report. The alternative standard will not be effective until approved by the Regional Board's Executive Officer, and approval will be presumed unless it is rejected in writing within 90 days of its submittal. | | X | | | | |
| MUNI-3 | For agencies that do not sweep every street at least once a month, the street sweeping that is conducted to achieve the monthly average described in MUNI-1 above should be prioritized to sweep the streets that have been found to typically be the dirtiest and to conduct sweeping prior to the rainy season. | X | | | X | | |
| MUNI-4 | Identify and target areas for more frequent sweeping throughout the year or just prior to the rainy season. | X | | | X | | |
| STREET CLEANING OPERATION TO MAXIMIZE POLLUTANT REMOVAL | | | | | | | |
| MUNI-5 | Check that street sweeping equipment is in proper adjustment. | X | | | X | | |
| MUNI-6 | Operate street sweeping equipment at the speed specified by the manufacturer. | X | | | X | | |
| MUNI-7 | When using broom sweepers, the operator will check that the proper weights on main and gutter brooms are used. | X | | | X | | |

^a Curbed streets swept on at least a monthly average.

| PS # | Description | Status | | | Evaluation² | | |
|-------------|---|--------------------|-----------------------|-----------------------------|-------------------------------|----------------|----------------------|
| | | Implemented | Not Applicable | Modified¹ | Effective | Unknown | Not Effective |
| MUNI-8 | Discourage allowing residents to “opt out” of street sweeping program. | X | | | X | | |
| MUNI-9 | When purchasing new sweepers, review all alternative equipment and new technologies to maximize pollutant removal. | X | | | X | | |
| MUNI-10 | Provide operators with adequate resources to conveniently report trees interfering with street sweeping. | X | | | X | | |
| MUNI-11 | Track and report curbed miles swept in the Annual Report. | X | | | X | | |
| MUNI-12 | Track volume or weight of material removed in the Annual Report. | X | | | X | | |
| MUNI-13 | Identify and target areas for additional efforts to remove vehicles, as appropriate. | X | | | X | | |
| MUNI-14 | Specify in all new or re-bid contracts that in case of equipment failure, back up equipment must be available to ensure the route is completed and all information necessary for record keeping will be provided. | X | | | X | | |
| MUNI-15 | Maintain a consistent sweeping schedule to the maximum extent practicable (MEP). A copy of the street sweeping schedule shall be submitted with the Annual Report. | X | | | X | | |
| MUNI-16 | Take appropriate measures to keep curbed areas clear during street sweeping. Measures may include, but are not limited to, posting “no stopping,” “no parking” signs in Business Districts, near large apartment complexes, etc.; posting street sweeping signs on streets where appropriate; and, distributing newsletters and other public education materials notifying residents and businesses of street sweeping schedules. | X | | | X | | |
| MUNI-17 | Schedule street sweeping activities when parked cars have minimal impact. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|--|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| MUNI-18 | <p>Investigate and develop, if necessary, alternative methods of handling leaf fall and develop an appropriate leaf removal program, such as:</p> <ul style="list-style-type: none"> Operate street sweeping equipment in tandem, Utilize a leaf removal machine just prior to street sweeping, Utilize a front end loader with a dump truck just prior to sweeping, and/or Encourage residents to collect and compost leaves or coordinate with a local composting program. If composting is infeasible, agencies may schedule removal of bagged leaves. | X | | | X | | |
| DISPOSAL OF STREET SWEEPING MATERIALS | | | | | | | |
| MUNI-19 | Ensure proper handling and disposal of materials removed from streets to prevent discharges of pollutants to surface waters or groundwater. | X | | | X | | |
| ROUTINE INSPECTION AND CLEANING | | | | | | | |
| MUNI-20 | Inspect, and clean, as necessary, public storm drainage facilities (i.e., inlets, V-ditches, pump stations, open channels, and watercourses), once a year on average unless an alternative schedule is approved as described in MUNI-21. The inspections and needed cleaning will preferably occur prior to the rainy season. In calculating this average, some facilities may be inspected more than once per year and others less than once per year. | X | | | X | | |
| MUNI-21 ^b | If it is necessary to inspect and clean public storm drainage facilities (i.e., inlets, V-ditches, pump stations, open channels, and watercourses), less than once a year on an annual average, the rationale for the alternative standard must be described in a written action plan. The rationale should demonstrate the alternative schedule is equivalent in terms of protecting water quality as the annual average inspection. The action plan will be submitted to the Regional Board as part of the Annual Report. The alternative standard will not be effective until approved by the Regional Board's Executive Officer, and approval will be presumed unless it is rejected in writing within 90 days of its submittal. | | X | | | | |

^b Public storm drainage facilities are inspected and cleaned once a year on average.

| PS # | Description | Status | | | Evaluation² | | |
|----------------------|--|--------------------|-----------------------|-----------------------------|-------------------------------|----------------|----------------------|
| | | Implemented | Not Applicable | Modified¹ | Effective | Unknown | Not Effective |
| MUNI-22 | When cleaning storm drain inlets and lines, remove the maximum amount of material at the nearest access point to minimize discharges to watercourses. | X | | | X | | |
| MUNI-23 | Develop a storm drainage facility inspection and maintenance plan. The plan will include: A. Schedule for inspecting storm drainage facilities; B. Rationale for determining when to clean inlets, etc.; C. Identification of target areas that tend to accumulate excessive pollutants for sweeping; and, D. Inventory of the major storm drain system. | X | | | X | | |
| MUNI-24 | Unless provided for in an alternative plan approved by the Regional Board's Executive Officer, inspect and clean as needed public storm drainage facilities that have been identified to accumulate excessive pollutants twice a year. Preferably, inspections will occur prior to and after the rainy season to prevent flooding and discharge of pollutants. | X | | | X | | |
| MUNI-25 | Inspect storm drain inlets monthly during the wet season in areas suspected of illegal dumping, and clean as necessary. | X | | | X | | |
| MUNI-26 | When sweeping over storm drain inlets, prevent pushing debris into the inlet. | X | | | X | | |
| RECORDKEEPING | | | | | | | |
| MUNI-27 | Report the amount of material removed when cleaning storm drainage facilities. | X | | | X | | |
| MUNI-28 | Document and track responses to spill incidents. | X | | | X | | |
| MUNI-29 | Track storm drain inlets, which require more frequent cleaning. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|-----------------------------|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| MUNI-30 | Document and maintain the following records: A. Areas/sites inspected; B. Silt and vegetation quantities removed; C. Man-made materials removed, and type and estimate of volume removed; D. Disposal practices and follow-up actions; E. Spill incidents and follow-up actions; F. Application of chemicals (type used, areas applied); and, G. Areas for possible improvements. | X | | | X | | |
| DISPOSAL OF MATERIAL | | | | | | | |
| MUNI-31 | A plan for the storage, use and disposal of hazardous materials will be developed and implemented to insure these materials are not allowed to enter the storm drain system. The plan will include employee training and spills management. Disposal of the material will be at an appropriate facility. | X | | | X | | |
| SPILL RESPONSE | | | | | | | |
| MUNI-32 | If a spill is suspected to be toxic or a hazardous material, maintenance staff will call the public safety dispatcher, 911, County Hazardous Material Program and/or appropriate designated personnel. | X | | | X | | |
| MUNI-33 | If non-hazardous materials are spilled, maintenance staff should contain the spill area immediately to prevent additional dumping and discharge of pollutants into the storm drain system and sweep as soon as practicable. | X | | | X | | |
| MUNI-34 | Establish response/removal procedures for spills after work hours with appropriately designated personnel. | X | | | X | | |
| MUNI-35 | Maintenance staff will report measurable spills to and work with appropriately designated personnel to determine the proper follow-up response. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|--|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| MUNI-36 | If appropriate, maintenance staff will notify appropriate designated personnel and agencies for possible future enforcement action. | X | | | X | | |
| GEOGRAPHICAL PROBLEM AREAS | | | | | | | |
| MUNI-37 | <p>Instead of flushing streets and allowing water to drain into storm drain inlets when steep and narrow streets exist and where it is difficult to use a street sweeper or vacuum:</p> <p>A. Encourage residents to maintain streets by removing leaves, litter, etc.,</p> <p>B. If flushing streets or sidewalks, protect the storm drain inlet, and remove materials using vacuum equipment or by some other appropriate means to remove residual material and water to the maximum extent practicable.</p> | X | | | X | | |
| MUNI-38 | <p>When cars are left on the street:</p> <p>A. Consider posting restricted parking signs on sweeping days to increase accessibility;</p> <p>B. Post temporary signs to remove cars and sweep according to posted schedule; and,</p> <p>C. Protect the storm drain inlet, and remove material using vacuum equipment or by some other appropriate means to remove residual material and water.</p> | X | | | X | | |
| INSPECTION AND MAINTENANCE OF STORMWATER FACILITIES | | | | | | | |
| MUNI-39 ^c | Inspect pump stations after the wet season and develop a time schedule for maintenance activities prior to the next wet season. | | X | | | | |
| MUNI-40 | Inspect trash racks and/or oil absorbent booms after significant storms. Remove debris in trash racks and replace oil absorbent booms as needed. | X | | | X | | |

^c There are no pump stations in our jurisdiction.

| PS # | Description | Status | | | Evaluation ² | | |
|---|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| PERMIT AND OTHER REGULATORY REQUIREMENTS | | | | | | | |
| MUNI-41 | Comply with the regulatory requirements of the appropriate agencies (e.g., California Department of Fish and Game, the U.S. Army Corps of Engineers, etc.). | X | | | X | | |
| TARGET AREAS FOR IMPROVEMENT | | | | | | | |
| MUNI-42 | Identify illegal dumping hot spots. Conduct regular inspections, postings and sweep-up to discourage additional dumping incidents. Consider appropriate actions to prevent illegal dumping. | X | | | X | | |
| MUNI-43 | Coordinate with appropriate personnel and agencies to enforce laws in targeted areas to prevent illegal dumping. | X | | | X | | |
| MUNI-44 | Evaluate additional areas for use of trash racks, oil absorbent booms, outlet protection, etc. to reduce pollution to watercourses. | X | | | X | | |
| DESILTING AND DISPOSAL | | | | | | | |
| MUNI-45 | Minimize desilting activities and disturbances of channel bottoms during the wet season. | X | | | X | | |
| MUNI-46 | Dispose of desilted material properly and do not allow it to re-enter the watercourse after removal to the maximum extent practicable. | X | | | X | | |
| VEGETATION | | | | | | | |
| MUNI-47 | Retain (design approved) low growing vegetation in channel bottoms and slopes to detain runoff, minimize erosion, and trap sediment, and enhance riparian habitat when evaluating the need to maintain channel design capacity, as appropriate. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|-------------------------------------|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| LITTER CONTROL | | | | | | | |
| MUNI-48 | Require an adequate number of litter receptacles in commercial areas and other litter source areas. | X | | | X | | |
| MUNI-49 | Require the pick-up of litter receptacles on a frequent basis to minimize or prevent spillage. | X | | | X | | |
| MUNI-50 | Promote public education efforts to include an anti-littering message. Specifically, encourage: 1) residents to compost yard waste; 2) residents and businesses to remove litter from their property and properly contain waste; and 3) owners of loading docks, restaurants and other litter source areas to sweep outdoor areas daily and properly contain waste. | X | | | X | | |
| MUNI-51 | Encourage appropriate personnel and agencies to post signs and enforce anti-littering laws. | X | | | X | | |
| MUNI-52 | Document and maintain the following records: A. Areas targeted for litter removal, and B. Total amount of material removed. | X | | | X | | |
| GRAFFITI ABATEMENT PRACTICES | | | | | | | |
| MUNI-53 | Take reasonable and practicable measures to protect the storm drain inlets (such as, tarps in work areas, sandbags, booms or barriers around stormwater inlets) prior to removing graffiti from walls, signs, sidewalks, or other structures needing graffiti abatement. Clean up afterwards by sweeping or vacuuming thoroughly, and/or by using oil absorbent and properly disposing of the absorbent. | X | | | X | | |
| MUNI-54 | Prohibit the discharge of debris, sweeping compound waste, paint waste, or wash water containing sweeping compounds to the storm drain. | X | | | X | | |

| PS # | Description | Status | | | Evaluation² | | |
|-------------|--|--------------------|-----------------------|-----------------------------|-------------------------------|----------------|----------------------|
| | | Implemented | Not Applicable | Modified¹ | Effective | Unknown | Not Effective |
| MUNI-55 | Direct runoff from all types of sand blasting and high-pressure water (no cleaning agents) washing activities into a landscaped or dirt area. If a landscaped area is not available, filter runoff through an appropriate filtering device (e.g., coarse sand bags or filter fabric to keep sand, particles, and debris out of storm drain). | X | | | X | | |
| MUNI-56 | Avoid conducting graffiti abatement activities during a rainstorm. If it rains during graffiti abatement activities unexpectedly, take appropriate action to minimize the impact on the quality of stormwater (e.g., divert runoff around work areas). | X | | | X | | |
| MUNI-57 | Train employees and volunteers conducting graffiti abatement in using these performance standards. Incorporate these performance standards into agency contract specifications. Provide volunteers and contractors conducting graffiti abatement with educational material describing the graffiti abatement performance standards. | X | | | X | | |
| MUNI-58 | It is recommended one supervisor/management-level person be assigned the responsibility for ensuring these performance standards are implemented. | X | | | X | | |
| MUNI-59 | Clean equipment used for graffiti abatement activities in accordance with the performance standards. | X | | | X | | |
| MUNI-60 | Dispose of cleaning compounds in accordance with the corporation yard's Stormwater Pollution Prevention Plan (SWPPP). | X | | | X | | |
| MUNI-61 | Consider using a waterless chemical cleaning method for graffiti removal (e.g., gels or trigger spray compounds). | X | | | X | | |
| MUNI-62 | If using a graffiti abatement method that generates wash water containing a cleaning compound (such as high-pressure washing with a cleaning compound) protect storm drains and dispose of materials properly. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|--|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| GENERAL PRACTICES FOR ROAD REPAIR & MAINTENANCE | | | | | | | |
| MUNI-63 | Schedule excavation and road maintenance activities for dry weather, if feasible. | X | | | X | | |
| MUNI-64 | Perform major equipment repairs at the corporation yard, when practical. | X | | | X | | |
| MUNI-65 | When refueling or maintaining vehicles and equipment on-site, use a location away from storm drain inlets and creeks. | X | | | X | | |
| MUNI-66 | Recycle used motor oil, diesel oil, concrete, broken asphalt, etc., whenever possible. | X | | | X | | |
| MUNI-67 | Provide proper containment of diesel fuel used to lubricate or clean equipment or parts. | X | | | X | | |
| MUNI-68 | Train employees in using these general practices for road repair and maintenance activities. | X | | | X | | |
| ASPHALT/CONCRETE REMOVAL | | | | | | | |
| MUNI-69 | Take measures to protect storm drain inlets prior to breaking up asphalt or concrete (e.g., cover inlets). Clean afterwards by sweeping all related materials. | X | | | X | | |
| MUNI-70 | After breaking up old pavement, remove and dispose of properly. | X | | | X | | |
| MUNI-71 | During saw-cutting operations, block or berm around storm drain inlets using sandbags or an equivalent filter device, or absorbent materials such as pads, pillows and socks to contain slurry. If slurry enters the storm drain system, have the material removed to the maximum extent practicable. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|-----------------------------|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| MUNI-72 | Remove saw-cut slurry (e.g., with a shovel or vacuum) before leaving at the end of the day. | X | | | X | | |
| PATCHING/RESURFACING | | | | | | | |
| MUNI-73 | Prohibit the stockpiling of materials in streets, gutter areas or near storm drain inlets or creeks unless these areas are protected. | X | | | X | | |
| MUNI-74 | Protect storm drain openings before applying seal coat, slurry seal, etc. Prevent to the maximum extent practicable material from entering storm drain inlets and sweep up debris, if needed. | X | | | X | | |
| MUNI-75 | Do not wash excess material from exposed aggregate concrete or similar treatments into an unprotected street or storm drain inlet. Designate an unpaved area for sweeping up and proper disposal of excess materials. | X | | | X | | |
| MUNI-76 | Use only as much water as necessary for dust control to avoid runoff. | X | | | X | | |
| MUNI-77 | Sweep up as much material as possible and dispose of properly. Only wash down streets if runoff is controlled or contained. | X | | | X | | |
| MUNI-78 | Catch drips from parked paving equipment with pans or absorbent material placed under the machines or berm the area around them to the maximum extent practicable. | X | | | X | | |
| MUNI-79 | Clean up all spills and leaks from other equipment and work site areas using "dry" methods (absorbent materials and/or rags). Properly dispose of absorbent materials and rags. If spills occur on dirt areas, dig up and remove contaminated soil properly in a timely basis. | X | | | X | | |
| MUNI-80 | Prior to completion of the job, remove stockpiles (asphalt materials, sand, etc.). | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|--|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| MUNI-81 | If it rains unexpectedly, take appropriate action to prevent pollution of stormwater runoff (e.g., divert runoff around work areas). | X | | | X | | |
| SIGNING AND STRIPING | | | | | | | |
| MUNI-82 | Store spill absorbent materials on vehicles to be used in the event of a spill. | X | | | X | | |
| MUNI-83 | Contain and sweep up waste materials, and dispose of them properly according to the Material Safety Data Sheet. | X | | | X | | |
| AGENCY EQUIPMENT CLEANUP & STORAGE | | | | | | | |
| MUNI-84 | Flush sprayer paint supply lines at the corporation yard. Use approved collection methods and dispose of recycled waste materials at an appropriate waste facility. | X | | | X | | |
| MUNI-85 | To the maximum extent practicable, clean sprayers and patch paving equipment at the end of the day. Use approved collection methods and dispose or recycle waste materials at an approved facility. | X | | | X | | |
| MUNI-86 | Cover sprayers, patch and paving equipment to prevent rainfall from contacting pollutants (examples of cover include, but are not limited to, tarps, overhangs or inside of buildings). | X | | | X | | |
| GENERAL BMPS FOR MUNICIPAL MAINTENANCE FACILITIES | | | | | | | |
| MUNI-87 | Assign one person the primary responsibility for coordinating implementation of BMPS. This person will also be responsible for ensuring that all individuals using the facility are aware of BMPS. | X | | | X | | |
| MUNI-88 | Prepare spill containment kits and store them in locations that have potential for spills (fueling areas, etc.). | X | | | X | | |
| MUNI-89 | Stencil/mark inlets to the storm drainage system within the facility with a message such as "No Dumping, Drains to Bay." | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|-----------------------------------|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| MUNI-90 | Refer to existing plans (e.g., Hazardous Materials Business Plans and/or Spill Prevention Control and Countermeasures Plan), incorporate stormwater BMPs in any updates, and periodically review with persons using the facility. | X | | | X | | |
| MUNI-91 | Conduct a facility inspection annually. | X | | | X | | |
| MUNI-92 | Prepare a Storm Water Pollution Prevention Plan (SWPPP) for each maintenance facility. | X | | | X | | |
| MUNI-93 ^d | Develop and post BMPs for other public agencies that use the corporation yard. | | X | | | | |
| MUNI-94 | Distribute educational materials and post them in appropriate areas. | X | | | X | | |
| WASHING VEHICLES/EQUIPMENT | | | | | | | |
| MUNI-95 | Clean all vehicles and equipment on designated wash pad areas. | X | | | X | | |
| MUNI-96 | Monitor wash pad areas to make sure they are consistently used. | X | | | X | | |
| MUNI-97 | Wash vehicles and equipment, whether on-site or off-site, so wash water drains to the sanitary sewer or is recycled. Ensure the on-site wash pad area and sump are large enough so that all wash water drains to the sanitary sewer or recycling system. Re-grade the area, if necessary, or install dikes to control wash water. | X | | | X | | |
| FUEL DISPENSING AREAS | | | | | | | |
| MUNI-98 | A plan for the storage, use and disposal of hazardous materials will be developed and implemented to insure these materials are not allowed to enter the storm drain system. The plan will include employee training and spills management. | X | | | X | | |

^d Other public agencies do not use our corporation yard.

| PS # | Description | Status | | | Evaluation ² | | |
|-------------------------|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| MUNI-99 | Store spill containment kits nearby. If spills occur, use dry methods to sweep the fueling area and follow procedures (e.g., the Hazardous Materials Business Plan (HMBP) and/or Spill Prevention Control and Countermeasure Plan). | X | | | X | | |
| MUNI-100 | Train employees in proper fueling and sweeping procedures. | X | | | X | | |
| MUNI-101 | Do not conduct fueling over open ground. The ground should be covered by concrete or asphalt protected with a sealant. | X | | | X | | |
| MUNI-102 | Install signs reminding people not to “top off” tanks. | X | | | X | | |
| MUNI-103 ^e | Discourage mobile fueling. If equipment is fueled with a mobile fuel truck, establish designated areas for fueling. | | X | | | | |
| MUNI-104 | Investigate covering existing liquid fuel dispensing areas and implement if financially feasible. | X | | | X | | |
| MUNI-105 | Design new fueling areas to limit to the maximum extent practicable “runon” of stormwater and runoff of spills. | X | | | X | | |
| CHEMICAL STORAGE | | | | | | | |
| MUNI-106 | Store paint and other chemicals in an approved covered containment area. Design the floor inside so that any spilled materials will be contained and easily removed. Keep all containers with hazardous materials or waste closed when not filling or emptying. Label the outside according to Department of Transportation regulations. Protect the area from vandalism. | X | | | X | | |
| MUNI-107 | If containers with hazardous materials or wastes are stored outside, keep containers in an approved containment area. Ensure all of the containers are closed with tight-fitting lids. | X | | | X | | |

^e Fueling occurs at fixed stations within our jurisdiction.

| PS # | Description | Status | | | Evaluation ² | | |
|-----------------------|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| MUNI-108 | Annually review agency's plan for hazardous materials storage requirements. | X | | | X | | |
| MUNI-109 | Review Material Safety Data Sheets so incompatible materials have appropriate separation. | X | | | X | | |
| CHEMICAL USAGE | | | | | | | |
| MUNI-110 | Keep necessary safety equipment and spill containment kits readily accessible in areas where chemicals are used. Inspect safety equipment regularly so that they are operational. | X | | | X | | |
| MUNI-111 | Review Material Safety Data Sheets. | X | | | X | | |
| MUNI-112 | Minimize the use of chemicals. Use water-based paints and non-toxic chemicals as much as possible. | X | | | X | | |
| MUNI-113 | Dispose of excess chemicals at an appropriate disposal location or recycle the chemical. | X | | | X | | |
| MUNI-114 | Wipe oil based paint out of brushes. Filter and reuse thinners. A plan for the storage, use and disposal of hazardous materials will be developed and implemented so that these materials are not allowed to enter the storm drain system. The plan will include employee training and spills management. | X | | | X | | |
| MUNI-115 | Rinse latex paint out of brushes and discharge rinse water to the sanitary sewer. Dry excess paint in cans and dispose of the cans in the trash. A plan for the storage, use and disposal of hazardous materials will be developed and implemented to insure these materials are not allowed to enter the storm drain system. The plan will include employee training and spills management. | X | | | X | | |
| MUNI-116 | Collect used automobile fluids and dispose of them at an appropriate facility or recycle them. A plan for the storage, use and disposal of hazardous materials will be developed and implemented to insure these materials are not allowed to enter the storm drain system. The plan will include employee training and spills management. | X | | | X | | |

| PS # | Description | Status | | | Evaluation² | | |
|--|---|--------------------|-----------------------|-----------------------------|-------------------------------|----------------|----------------------|
| | | Implemented | Not Applicable | Modified¹ | Effective | Unknown | Not Effective |
| MUNI-117 | Properly dispose of or recycle used solvents/chemicals. A plan for the storage, use and disposal of hazardous materials will be developed and implemented to insure these materials are not allowed to enter the storm drain system. The plan will include employee training and spills management. | X | | | X | | |
| FLEET MAINTENANCE/VEHICLE PARKING AREAS | | | | | | | |
| MUNI-118 | Inspect equipment for leaks on a regular basis. Use drip pans under leaky vehicles. Repair vehicles with significant leaks. | X | | | X | | |
| MUNI-119 | Drain and replace motor oil and other fluids in a covered shop area. If fluids are changed outdoors, designate an area where there are no connections to storm drains or the sanitary sewer and where spills can be easily swept up. | X | | | X | | |
| MUNI-120 | Periodically dry sweep the area. | X | | | X | | |
| GENERAL HOUSEKEEPING | | | | | | | |
| MUNI-121 | Inspect the yard routinely to ensure there are no illegal discharges to the storm drain system. During storms, pollutant discharges will be controlled to the maximum extent practicable. | X | | | X | | |
| MUNI-122 | Sweep the paved portion of the corporation yard(s). Dispose of material removed from streets and storm drainage facilities regularly to eliminate exposure to rainwater and runoff to the storm drain system. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|--|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| GENERAL BMPS FOR PESTICIDES (pesticides include herbicides) | | | | | | | |
| MUNI-123 | Consider alternatives for pesticide/herbicide control including: A. No controls, B. Physical/mechanical controls (hand labor, and county work furlough crews, etc.), C. Alternative vegetation controls (mulching, prescribed burns, etc.), D. Biological controls (predators, parasites, goats, etc.), E. Less toxic chemical controls (e.g., soaps and oils), and/or F. Hot water. | X | | | X | | |
| MUNI-124 | Use the most effective, least toxic pesticides. Take into consideration the LD50, overall risk to the applicator and impact to the environment. | X | | | X | | |
| MUNI-125 | Comply with all appropriate federal, state and local laws and regulations including the following directives: A. Federal: U.S. EPA Air and Toxics Division, Pesticides, B. State: Cal-EPA Department of Pesticide Regulation, and C. Local: Contra Costa County Agricultural Commissioner. | X | | | X | | |
| MUNI-126 | Appropriate agency personnel will read and follow label instructions. | X | | | X | | |
| MUNI-127 | Encourage applicators to attend meetings and other professional avenues for continuing education (e.g., U.C. Cooperative Extension classes, Pesticide Applicator Professional Association). | X | | | X | | |
| MUNI-128 | Contact the U.C. Statewide IPM Project, the U.C. Cooperative Extension Office as well as private consulting firms, and libraries for information on integrated pest management, as appropriate. | X | | | X | | |
| MUNI-129 | Use state-certified pesticide applicators. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|------------------------|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| PESTICIDE USAGE | | | | | | | |
| MUNI-130 | Apply pesticides at the appropriate time to maximize their effectiveness and minimize the likelihood of discharging non-degraded pesticides in stormwater runoff. | X | | | X | | |
| MUNI-131 | Do not mix or load pesticides adjacent to a storm drain inlet, culvert or watercourse. | X | | | X | | |
| MUNI-132 | Select pesticides and application techniques along road sides that will retain some vegetative cover to help prevent soil erosion, trap pollutants and slow the rate of stormwater runoff, where possible. | X | | | X | | |
| MUNI-133 | Calibrate field equipment prior to use to ensure desired application rate. Mix only as much material as necessary for treatment. | X | | | X | | |
| MUNI-134 | Follow all legal requirements for Pesticide Management Zones (defined as areas where specific pesticide residues have been detected in groundwater) in Section 6800, Title 3 of the California Code of Regulations. | X | | | X | | |
| MUNI-135 | Train applicators in the safe use of pesticides and proper inspection of applicator equipment to prevent accidental pesticide leaks, spills and hazards to applicators and the environment. | X | | | X | | |
| MUNI-136 | If changing pesticides or cleaning spray tanks, use tank rinse water as product over a targeted area within the application site. | X | | | X | | |
| MUNI-137 | Maintain a record of all treatments including pesticide use for each site. | X | | | X | | |
| MUNI-138 | Reduce to the maximum extent practicable the use of algacides containing copper as an active ingredient if discharges may ultimately reach watercourses or the San Francisco Bay-San Joaquin Delta. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|---|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| COPPER AS AN ACTIVE INGREDIENT | | | | | | | |
| MUNI-139 | Reduce to the maximum extent practicable the use of copper-based pesticides. If applying copper as an algaecide, consider using a chelated form of copper for greater solubility (less settling to the bottom). | X | | | X | | |
| MUNI-140 | Summarize annual copper usage (including usage by contractors) and provide this information in the Program's Annual Report. | X | | | X | | |
| MUNI-141 | Eliminate the use of copper-based pesticides (when a comparable alternative exists). | X | | | X | | |
| DIAZINON AS AN ACTIVE INGREDIENT | | | | | | | |
| MUNI-142 | Explore the possibility of using alternative controls or less toxic chemicals before using diazinon. | X | | | X | | |
| MUNI-143 | Promote public outreach efforts to educate homeowners about the effects of home use of diazinon and other insecticides on aquatic life. Program will contact the Department of Pesticide Regulation to elicit their assistance. | X | | | X | | |
| MUNI-144 | Reduce or eliminate the use of diazinon when a comparable product exists. | X | | | X | | |
| PESTICIDE STORAGE | | | | | | | |
| MUNI-145 | Develop and implement a plan for the storage, use and disposal of hazardous materials so that these materials are not allowed to enter the storm drain system. The plan will include employee training and spills management. | X | | | X | | |
| MUNI-146 | Prepare spill kits, store the kits near pesticides, and train employees to use them. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|-------------------------------|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| MUNI-147 | Store pesticides and other chemicals indoors in a locked and posted storage unit. | X | | | X | | |
| MUNI-148 | Store pesticides in labeled containers. | X | | | X | | |
| PESTICIDE DISPOSAL | | | | | | | |
| MUNI-149 | Rinse empty pesticide containers and dispose of rinse water per California Code of Regulations requirements. | X | | | X | | |
| MUNI-150 | Dispose of triple rinsed empty pesticide containers according to recommendations of the Contra Costa County Agricultural Commissioner and the manufacturer. | X | | | X | | |
| MUNI-151 | Attempt to find a qualified user for any unwanted pesticides, or return it to the manufacturer if unopened. | X | | | X | | |
| MUNI-152 | Develop and implement a plan for the storage, use and disposal of hazardous materials so that these materials are not allowed to enter the storm drain system. The plan will include employee training and spills management. | X | | | X | | |
| FERTILIZER APPLICATION | | | | | | | |
| MUNI-153 | Avoid applications if runoff is probable. On hillsides, avoid applying more water than the soil can absorb. | X | | | X | | |
| MUNI-154 | Check irrigation equipment prior to applying fertilizer to determine if it is working properly. Monitor irrigation systems to avoid over watering. | X | | | X | | |
| MUNI-155 | Confine fertilizer to targeted area. If fertilizer has been applied to hardscape areas (e.g., roadways, walkways, paved surfaces), sweep, vacuum or blow back fertilizer from these areas before irrigating and/or rainfall. Do not wash down hardscape areas. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|---|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| PARK AND GENERAL LANDSCAPE AREAS | | | | | | | |
| MUNI-156 | Select fertilizers to complement local soil conditions, climate and plant health. | X | | | X | | |
| MUNI-157 | Fertilize plants based on plant type, physical appearance, soil or foliage testing. | X | | | X | | |
| MUNI-158 | If over-application is suspected, test soil and/or plant tissue for nutrients and trace elements as needed prior to applying fertilizer. If copper is not needed, eliminate it from the micronutrient blend. | X | | | X | | |
| MUNICIPAL GOLF COURSES | | | | | | | |
| MUNI-159 ^f | Distribute educational materials promoting the implementation of Best Management Practices to municipal golf course operators. | | X | | | | |
| MUNI-160 ^g | Test well water or other irrigation source water (e.g., nitrates) to help determine fertilizer requirements, as needed. | | X | | | | |
| MUNI-161 ^h | Test soil and foliage on greens and tees, as needed, to determine need for applications. If copper is not needed, the agency will eliminate it from the micronutrient blend. | | X | | | | |
| MUNI-162 ⁱ | Design golf courses to restore and/or maintain riparian areas/wetland and establish vegetation buffer zones along sensitive wetland areas to reduce runoff into waterways. Also, consider using detention ponds to control runoff and remove excess nutrients and/or divert excess irrigation water to areas where it can be used (e.g., roughs). | | X | | | | |

^f There are no municipal golf courses within our jurisdiction.

^g Ibid.

^h Ibid.

ⁱ Ibid.

| PS # | Description | Status | | | Evaluation ² | | |
|---------------------------|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| MUNI-163 ^j | Prepare a management plan which includes: 1) a comprehensive review of existing practices; and 2) a plan for fertilizer (and pesticide) use to minimize the amount needed and to control runoff. | | X | | | | |
| MUNI-164 ^k | Test soil and foliage in fairways as necessary to determine need for applications. If copper is not needed, eliminate it from the micronutrient blend. | | X | | | | |
| FERTILIZER STORAGE | | | | | | | |
| MUNI 165 | Store fertilizers indoors, in a shed or in a storage cabinet. | X | | | X | | |

1. A performance standard is "Modified" if: (a) it was or will be deleted; (b) the language or content of the performance standard was or will be changed; and/or (c) the implementation schedule for the performance standard was or will be changed.

An explanation of how the performance standard was or will be "Modified" is provided in the Qualitative Results form. The implementation status is provided in the "Modified Performance Standards" form.

2. An evaluation of the PSs' effectiveness is provided in the Qualitative Results form.

^j Ibid.

^k Ibid.

Quantitative Results – Municipal Maintenance PSs

| <i>Description</i> | <i>Industrial Areas</i> | <i>Commercial Areas</i> | <i>Residential Areas</i> | <i>Total</i> |
|--|-------------------------|-------------------------|--------------------------|--------------|
| Street Sweeping | | | | |
| Total number of curb miles within Agency's jurisdiction | | | | N/C |
| Number of curb miles swept | | | | 18,425 |
| Total volume of material removed through sweeping (cubic yards) | | | | 1,982 |
| Estimated Amount Removed by Sweeping for the Following Parameters | | | | |
| Copper (lbs) | | | | 385.4 |
| Lead (lbs) | | | | 385.4 |
| Total Petroleum Hydrocarbons (lbs) | | | | 14,131 |
| Sediment (tons) | | | | 3,212 |
| Other | | | | |
| Publicly Owned Storm Drain Facilities | | | | |
| Total Number of Storm Drain Facilities | | | | |
| Inlets | | | | 3,496 |
| Culverts (miles) | | | | N/C |
| V-Ditches/Roadside Ditches (miles) | | | | N/C |
| Pump Stations | | | | 5 |
| Constructed Channels ⁽¹⁾ (miles) | | | | N/C |
| Natural Watercourses ⁽²⁾ (miles) | | | | 6 |
| Trash Racks | | | | N/C |

| <i>Description</i> | <i>Industrial Areas</i> | <i>Commercial Areas</i> | <i>Residential Areas</i> | <i>Total</i> |
|--|-------------------------|-------------------------|--------------------------|--------------|
| Number of Storm Drain Facilities Inspected/Cleaned | | | | |
| Inlets | | | | 3,175 |
| Culverts | | | | 38 |
| V-Ditches/roadside ditches (miles) | | | | 10 |
| Pump stations | | | | 1 |
| Constructed Channels ⁽¹⁾ (miles) | | | | N/A |
| Natural Watercourses ⁽²⁾ (miles) | | | | N/A |
| Trash racks | | | | 0 |
| Volume of Material Removed from Storm Drain Facility Cleaning (cubic yards) | | | | |
| Inlets | | | | 743 |
| Culverts | | | | 318 |
| V-Ditches/roadside ditches | | | | 32 |
| Pump stations | | | | 0 |
| Constructed Channels ⁽¹⁾ | | | | 0 |
| Natural Watercourses ⁽²⁾ | | | | 0 |
| Trash racks | | | | 0 |
| Total Estimated Amount Removed Through Storm Drain Facility Cleaning for the Following Parameters | | | | |
| Copper (lbs) | | | | 162.9 |
| Lead (lbs) | | | | 333.0 |
| Total Petroleum Hydrocarbons (lbs) | | | | 5,883.5 |

| <i>Description</i> | <i>Industrial Areas</i> | <i>Commercial Areas</i> | <i>Residential Areas</i> | <i>Total</i> |
|---|-------------------------|-------------------------|--------------------------|--------------|
| Other | | | | |
| Number of Storm Drain Inlets requiring more frequent cleaning | | | | N/C |
| Number of Pump Station Maintenance inspections | | | | 52 |
| Number of Illegal Dumping Hot Spots Identified during Routine Inspections | | | | N/C |
| Miscellaneous Municipal Activities | | | | |
| Number of Municipal Maintenance Facility Inlets Stenciled/Marked with the "No Dumping" Message | | | | 321 |
| Number of Municipal Maintenance Facility Inspections for Leaky Vehicles and Equipment | | | | N/C |
| Total Volume of Material Collected from Litter Receptacles | | | | N/C |
| Pesticide/Herbicide Use | | | | |
| Total quantity of pesticides/herbicides applied (lbs) | 23.5 | 4,540 | 0 | 4,563.5 |
| Total quantity of pesticides/herbicides applied (gallons) | 153.5 | 6.8 | 0 | 160.3 |
| Total quantity of pesticides/herbicides applied with copper as an active ingredient (lbs) | 0 | 0 | 0 | 0 |
| Total quantity of pesticides/herbicides applied with copper as an active ingredient (gallons) | 0 | 0 | 0 | 0 |
| Total quantity of pesticides/herbicides applied with diazinon as an active ingredient (lbs) | 0 | 0 | 0 | 0 |
| Total quantity of pesticides/herbicides applied with diazinon as an active ingredient (gallons) | 0 | 0 | 0 | 0 |

| <i>Description</i> | <i>Industrial Areas</i> | <i>Commercial Areas</i> | <i>Residential Areas</i> | <i>Total</i> |
|--|-------------------------|-------------------------|--------------------------|--------------|
| Fertilizer Use | | | | |
| Total amount of fertilizer applied (lbs) | | 27,011 | | 27,011 |
| Total amount of fertilizer applied (gallons) | | 0 | | 0 |
| Number of Employees Attending Municipal Maintenance Training/Workshops | | | | |
| Municipal training/workshops | | | | 4 |
| Program training/workshops | | | | 4 |
| Other | | | | |

- (1) **Constructed Channels** – A constructed channel means a constructed pathway for conveying stormwater runoff. The constructed channel may be earthen, rock or concrete lined. It is differentiated from a “v-ditch” in so much as it has a defined bed.
- (2) **Natural Watercourses** – A natural watercourse means a natural pathway for conveying stormwater runoff within defined bed and banks.

**INSPECTION ACTIVITIES
PERFORMANCE STANDARDS (PSs)**

INSPECTION ACTIVITIES

PERFORMANCE STANDARDS (PSs)

Municipality: City of Brentwood

Permit Year: Five (2003/2004)

Qualitative Results – Inspection Activities PSs

Introduction:

Commercial developments are fast approaching the volume of residential development projects as the City of Brentwood's customer base made up from a current population of over 38,000 residents and the development from neighboring cities make commercial developments a viable option. Although the City has historically been relatively light with Industry, some of the City's existing industrial businesses are in the process of relocation to a new industrial park land use designation area to accommodate redevelopment. With this new industrial park comes expansion of existing industry and development of new industrial businesses. As these new businesses come into existence, the Public Works Department is beginning to map the storm drain systems and to create a data base for inspection and tracking of each new and existing facility. Public Works is currently evaluating the staffing requirements with respect to the enhanced operation & maintenance verification program requirements.

The Contra Costa County Clean Water Program, on behalf of all co-permittees, has updated the Model Commercial/Industrial Inspection Plan by strengthening its activities through contracts with publicly owned treatment works, expansion of its education and outreach materials for industrial/commercial facilities and private citizens, increased training of personnel, and the development of a multi-agency Industrial/ Commercial Ad-Hoc Advisory Workgroup. The City of Brentwood contracts with Delta Diablo Sanitation District for disposal of all of debris. The City of Brentwood has also expanded its enforcement and tracking efforts through the use of code enforcement personnel.

Implementation & Evaluation:

The City of Brentwood has been requiring all commercial projects to install structural pre-treatment units on-site immediately upstream of the point where they discharge into a public drainage system. As the warranties on several of these projects begin to expire, the City's Public Works Department is beginning to implement a maintenance program to inspect the privately owned units to ensure that adequate maintenance has been performed by the owners, as well as inspection and cleaning of all publicly owned units on a regular basis.

The City's Public Works and Parks & Recreation Departments are preparing to have more organized source controls in place for existing facilities. With the establishment of more single and multi-family residential, commercial, industrial and park sites in the City, each department encouraged to consolidate source control efforts so that one entity would have inter-jurisdictional responsibility for the establishment and monitoring of Stormwater Control Plans, rather than segregating controls amongst individual departments.

The types of priority businesses identified for inspection during the reporting period include automotive service facilities, automobile body repair shops, car washes, golf courses and pool companies.

The City's Public Works Department and Code Enforcement have teamed up in the enforcement of proper BMP's. For instance, code enforcement may identify a non-stormwater discharge during a routine inspection or callout and in turn dispatch Public Works to perform the cleanup, while during another instance Public Works personnel may respond to a callout and dispatch Code Enforcement to issue a citation. Code Enforcement has issued 17 enforcement actions during the reporting period, including 7 NOV's, 9 citations and 1 NTC, with 50 follow ups for various businesses and work performed at residences.

The most prevalent non-stormwater discharges from businesses and residences inspected during the reporting period include general debris, concrete residue and malodorous/colorful substances. It appears that pool companies have been a major contributor to these discharges with multiple violations from individual companies. Documenting these repeat offenders has helped in eliminating discharges through proactive inspections of the activities by these companies.

Three of the City's Public Works personnel responsible for facility inspections attended a Hazardous Materials Recognition & Awareness Training Workshop on April 8, 2004.

The City Public Works Department is preparing to provide educational briefings and material to vehicle service facilities, various small industrial facilities such as auto body shops and concrete batching and finishing companies, pool companies, car washes and golf courses relating to material such as petroleum products, paint, concrete and pesticides.

Modifications:

The City of Brentwood will intensify inspection performance standards as more commercial and industrial sites are completed.

Fiscal Year 2004/2005 Goals:

The City's Public Works Department will develop its maintenance program to inspect privately owned structural pretreatment units to ensure that adequate maintenance has been performed by the owners, as well as inspect and clean all publicly owned units on a regular basis, including a written procedure to comply with the inspection performance standards for priority businesses.

Performance Standard Status – Inspection Activities PSs

| PS # | Description | Status | | | Evaluation ² | | |
|--|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| DEVELOP AN INDUSTRIAL AND COMMERCIAL BUSINESS INSPECTION PLAN | | | | | | | |
| INSP-1 | <p>Use a written inspection plan that outlines specific steps the agency will take to conduct effective facility inspections. The written inspection plan consists of:</p> <p>A. A review of the types of businesses within the agency's jurisdiction that account for the variability of business types, complexity, and number; a listing by category of business types that have greater potential to cause stormwater pollution;</p> <p>B. A priority list of businesses or business types that include the number of facilities that will be inspected during the fiscal year; and</p> <p>C. As appropriate, a summary of efforts to coordinate inter/intra-agency issues.</p> | X | | | X | | |
| INSP-2 | <p>Adequately train facility inspectors. This includes the knowledge and skills necessary to conduct effective stormwater inspections, with coordination from the Program. This may include: stormwater regulations and requirements (including the agency's ordinance, municipal stormwater permit, and the industrial stormwater general permit); the impacts of non-stormwater discharges to the storm drains; inspection techniques and procedures; follow-up and enforcement procedures; and stormwater BMPs.</p> | X | | | X | | |
| INSP-3 | <p>Conduct outreach in addition to inspection activities, to inform facility representative about appropriate stormwater BMP information. This may include responding to telephone calls from business representatives, making presentations to business groups, or participating in focused outreach efforts coordinated by the targeted business groups.</p> | X | | | X | | |
| INSP-4 | <p>Inspect priority facilities as defined in the inspection plan at least once per year. The goal is to inspect facilities that have the potential to impact stormwater quality, at least once during the five-year permit period.</p> | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|---------------------------------|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| INSP-5 | Evaluate inspection results from the previous year to assess which industry types had the most impact on stormwater quality. Adjustments to the inspection plan are based on this assessment. | X | | | X | | |
| INSP-6 | Expand the inspection program to include additional types of outreach and inspection activities (e.g., public/private sector workshops, multi-lingual materials, etc.). | X | | | X | | |
| CONDUCTING AN INSPECTION | | | | | | | |
| INSP-7 | Respond to complaints or referrals from agencies concerning a facility. The response may include actions such as: interviewing the caller concerning the specific nature of the discharge; inspecting the site; locating any non-stormwater discharges to the storm drains; informing the facility representative of appropriate stormwater BMPs; and conducting follow-up measures to ensure compliance is achieved. | X | | | X | | |
| INSP-8 | Update the list of businesses from the following, as appropriate: inter/intra-agency referrals; other agency lists (e.g., Fire Department); business licenses; PG&E bills; water/utility bills; etc. | X | | | X | | |
| INSP-9 | Inspectors review existing information on the site and its regulatory history. | X | | | X | | |
| INSP-10 | Notifying the facility prior to the inspection is discretionary. | X | | | X | | |
| INSP-11 | Inspectors review the facility layout to locate the storm drain system and/or stormwater drainage path, storage areas, process areas, vehicle and heavy equipment wash and maintenance areas, and stormwater sampling locations, if applicable. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|---------|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| INSP-12 | <p>Inspections for potential discharges of pollutants may include, but are not limited to, the following areas and activities:</p> <p>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. Rooftop down spouts, G. Outdoor wash areas, H. Outdoor drainage from indoor areas, and I. Stormwater conveyance system maintenance and emergency response practices.</p> | X | | | X | | |
| INSP-13 | Inspectors report inspection information on the stormwater facility inspection report form. | X | | | X | | |
| INSP-14 | Inspectors use the facility's SWPPP, if available, as a tool in assessing the facility's stormwater pollution control activities. (This does not imply a review or approval of the adequacy of the SWPPP.) | X | | | X | | |
| INSP-15 | Inspectors identify and inform the facility representative about problems and violation(s), if applicable. A schedule for correcting problems identified during the inspection and a means for verifying its implementation is coordinated between the inspector and the facility representative. This information is also noted on the inspection form. | X | | | X | | |
| INSP-16 | Inspectors provide facility representatives with appropriate BMP information, education materials, and inter/intra-agency referrals, as appropriate. | X | | | X | | |
| INSP-17 | Inspectors obtain ongoing training to support inspection activities and to continue to improve program implementation. Inspector(s) representing the agency attend the Program's inspector training workshops. The Program will annually assess inspector training needs. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|---------------------------------------|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| EVALUATING FACILITY COMPLIANCE | | | | | | | |
| INSP-18 | The inspector determines if the facility is in compliance with the agency's stormwater ordinance (i.e., there are no unpermitted non-stormwater discharges, and pollutant exposure to rain is minimized). | X | | | X | | |
| INSP-19 | Inspectors prioritize facilities for re-inspection. If a problem is identified during the inspection, inspectors will perform a follow-up inspection or initiate a self-certification process where the facility representative certifies in writing that the problem has been removed or corrected within the time specified by the inspector. | X | | | X | | |
| ENFORCEMENT | | | | | | | |
| INSP-20 | Inspectors begin enforcement procedures, if appropriate, immediately. | X | | | X | | |
| INSP-21 | Agency conducts enforcement activities and reports these activities as set forth in the Inspection Plan. These activities are set forth by the agency's ordinance. | X | | | X | | |
| REPORTING | | | | | | | |
| INSP-22 | Annually review and assess the Inspection Plan and inspection results. This review is incorporated into the Annual Report. | X | | | X | | |

1. A performance standard is "Modified" if: (a) it was or will be deleted; (b) the language or content of the performance standard was or will be changed; and/or (c) the implementation schedule for the performance standard was or will be changed.

An explanation of how the performance standard was or will be "Modified" is provided in the Qualitative Results form. The implementation status is provided in the "Modified Performance Standards" form.

2. An evaluation of the PSs' effectiveness is provided in the Qualitative Results form.

Quantitative Results – Inspection Activities PSs

| Description | Industrial/ NOI | Commercial | | | Misc. ⁽²⁾ | Total |
|--|--------------------|-------------|--------------------------------|----------------------|----------------------|-------|
| | | Restaurants | Vehicle Service Facility | Other ⁽¹⁾ | | |
| INSPECTION SUMMARY | | | | | | |
| Number of Facilities scheduled for Inspection | | | | | | |
| Number of Facilities Inspected | | | | | 129 | |
| Number of Routine Facility Inspections | | | | | | |
| Number of Priority Facility Inspections | | | | | | |
| Number of Call-out Inspections | | | | | 13 | |
| Number of Follow up Inspections | | | | | 50 | |
| ENFORCEMENT | | | | | | |
| Total Number of Enforcement Actions | | | | | 17 | |
| Number of Notices of Violation (NOV) Issued | | | | | 7 | |
| Number of Warning/Pollutant Exposure Notices (WN/PEN) issued | | | | | | |
| Number of Fines Levied | | | | | 9 | |
| Number of Referrals | | | | | 17 | |

| Description | Industrial/ NOI | Commercial | | | Misc. ⁽²⁾ | Total |
|--|--------------------|-------------|--------------------------------|----------------------|----------------------|-------|
| | | Restaurants | Vehicle Service Facility | Other ⁽¹⁾ | | |
| BUSINESS EDUCATION & OUTREACH | | | | | | |
| Number of Educational Materials Distributed | | | | | | |
| INSPECTOR TRAINING | | | | | | |
| Number of Inspector Training Sessions | | | | | | 3 |
| Number of Inspectors Trained | | | | | | 3 |

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

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

**PUBLIC EDUCATION & INDUSTRIAL OUTREACH
PERFORMANCE STANDARDS (PSs)**

PUBLIC EDUCATION & INDUSTRIAL OUTREACH

PERFORMANCE STANDARDS (PSs)

Municipality: City of Brentwood

Permit Year: Five (2003/2004)

Qualitative Results – Public Education & Industrial Outreach PS

Introduction:

The City of Brentwood continues its attempts to educate the public about stormwater pollution and the environmental significance of the watersheds through newsletters, local newspaper articles, water bill inserts, public events, workshops and special programs. The CornFest, an annual community event is the most successful venue to distributing PEIO literature and materials. Another successful outreach event the City of Brentwood has been hosting is the annual creek clean-up day.

Implementation & Evaluation:

Teresa Wooten has been responsible for implementation of the Public Education & Industrial Outreach Performance Standards in conjunction with Program activities and for acting as a liaison with the PEIO Subcommittee for the bulk of the reporting period. Recently, Jeff Cowling has stepped in to replace Teresa. Currently, two staff members (Engineering and Public Works) are responsible for implementation of the Municipality's various PEIO activities.

The City's public outreach includes public information articles which have appeared in seasonal editions of the community newsletter distributed by the City. These articles discuss programs and efforts which eventually result in a reduction of water pollution. The topics include:

1. Household hazardous waste collection center location
2. Working to preserve local farms - preservation of permeable surfaces
3. Rebates for electric grasscycling lawn mowers
4. Treated water from waste water treatment plant outfalling to Marsh Creek
5. Solid waste diversion nears 50%
6. Hi-tech irrigation system for parks – reduction in runoff/waste
7. Free hazardous waste drop-off
8. Free clean up day for residents announced
9. Water quality report
10. Free leaf bags to avert clogged gutters
11. Solid waste hotline for extra pickups
12. City teams with disabled to keep parks clean
13. Annexed area to receive garbage service
14. New ordinance expected to boost recycling of construction debris
15. City still giving out free leaf bags
16. Using water wisely during the winter
17. Scouts & explorers to collect Yule trees
18. Cub scouts & parents join in cleanup of Marsh Creek
19. Time to clean weeds & other fire hazards
20. Public works week to focus on Community – recycling
21. Honor students adopt-a-roadway cleanup
22. Split duty truck for waste collections

The annual creek clean up day hosted by the City of Brentwood, in conjunction with the California Coastal Commission and the Contra Costa Resource Conservation District, is a public volunteer effort to clean up debris along the Marsh Creek watershed and its smaller tributaries. Marsh Creek itself is the City's major drainage tributary to the San Joaquin Delta. City Park staff provides educational instruction, PEIO handout material, safety advice, debris bags, gloves, debris hauling and refreshments to all participants. The City's two local newspapers, The Brentwood News and the Brentwood Press, as well as The East County Living magazine, "110 Degrees", advertise the Annual Marsh Creek Clean up Day and report on the participation. Attached is a bulletin advertising the September 18, 2004 event included as **Attachment "G"**.

Another annual activity which the City of Brentwood actively endorses and hosts each spring is the "bike to work day". This event is an attempt to get local commuters out of their cars for at least one day while encouraging alternative routes such as the Marsh Creek bicycle trail. Besides reducing pollutants caused by the use motorized vehicles, traveling by bicycle along the watershed at a slower pace in a peaceful and enjoyable environment serves as an educational awareness function towards preservation of this valuable resource.

Several years ago, a formal in depth study of the Marsh Creek watershed was performed by a group of University of California at Berkeley graduate students. This study focused on preservation of the environmental function of the watershed and enhancing the natural experience as a wildlife transportation and recreational corridor for the general public. The study, based upon technical data and site surveys, culminated with a public workshop and review by the City Council and Planning Commission. It included exhibits and displays on effective riparian habitat, designs incorporating environmentally adaptive development adjacent to the watershed, public information placards or monuments along the creek pathway, park "peninsulas" adjacent to the watershed and innovative drainage designs to minimize creek outfall (similar to the C.3 provision concepts). Conceptual designs from this study are currently being referenced with respect to the design of new developments adjacent to the creek.

The Natural Heritage Institute and the Delta Science Center at Big Break, through a grant from the State of California Coastal Conservancy, the San Francisco Bay Fund, the CALFED Bay-Delta Program, the Witter Foundation, and the David and Lucile Packard Foundation has prepared an informative booklet, *The Past and Present Condition of the Marsh Creek Watershed*. A copy of the cover and inset page is included as **Attachment "H"**.

A copy of each Program developed PEIO materials are compiled in Volume IV "Public Education & Industrial Outreach" of the Annual Report.

The City of Brentwood has been supporting the Contra Costa County Hazardous Waste program with published special collection events at the City's waste transfer facility. An excerpt from *Hometown News*, Spring 2004 edition, advertising a free drop-off on April 26, 2004 is included with **Attachment "C"**.

The City currently operates 22 vehicles and other motorized equipment using non-polluting fuels.

The City has included in its Construction Standard Details a requirement to stencil all storm drain inlets with a "Drains to Creek" logo for all new and modified development projects. In addition, this stenciling requirement is included as an item in the City's checklist for completed improvements prior to the issuance of a building permit.

Modifications:

The City is still in the process of fully implementing performance standards PEIO-4 and PEIO-5. Personnel have been trained in the answering and routing of these calls. A written procedure has not yet been completed.

Fiscal Year 2004/2005 Goals:

The City of Brentwood is will continue its public outreach with educational inserts inside monthly water bills, community newsletters and local newspaper articles. In addition, the City will be working with developers to sensibly plan projects located adjacent to the creek. Design efforts may include amenities to encourage multi-mode (walk, jog, bicycle and equestrian) pedestrian use along the creek for transportation and recreation by providing accessible links to retail/employment centers and parks. These amenities are intended to enhance the natural experience of the watershed environment through the use of indigenous riparian landscaping, while also providing educational plaques with benches along the path highlighting the environmental sensitivity of the watershed and defining the indigenous plant and wildlife species and their contribution to the watershed.

Performance Standard Status – Public Education & Industrial Outreach PSs

| PS # | Description | Status | | | Evaluation ² | | |
|--|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| PARTICIPATION IN PEIO SUBCOMMITTEE AND PROGRAM ACTIVITIES | | | | | | | |
| PEIO-1 | Designate a person who will implement the Public Education & Industrial Outreach (PEIO) activities in conjunction with Program activities and act as a liaison with the PEIO Subcommittee. | X | | | X | | |
| INTERNAL AGENCY COMMUNICATION AND TRAINING FOR AGENCY STAFF AND OFFICIALS | | | | | | | |
| PEIO-2 | Agency is responsible for identifying, developing, and communicating information about their Stormwater Management Plan so that its designated clean water staff and governing officials will be informed about its requirements, their role in implementing the Stormwater Management Plan, and progress made in the annual report. This includes the adaptation and/or development and distribution of materials to all appropriate agency staff and officials involved with clean water activities, including at least one information piece annually. | X | | | X | | |
| PEIO-3 | New employees involved with clean water activities will be provided with information about the CCCWP. | X | | | X | | |
| PROCEDURES AND TRAINING FOR HANDLING TELEPHONE CALLS | | | | | | | |
| PEIO-4 | Agency has a written procedure to follow for answering and efficiently routing stormwater-related telephone calls to appropriate agency staff for handling. | X | | | X | | |
| PEIO-5 | Agency staff assigned to answering or responding to telephone calls will be trained and be familiar with established written procedures. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|---|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| DISTRIBUTION OF PROGRAM INFORMATION PIECES | | | | | | | |
| PEIO-6 | Prior to the commencement of the fiscal year (i.e., July 1), agency will be responsible for identifying and implementing a plan describing how it will distribute copies of Program informational materials to its targeted audiences (e.g., developers, general public, etc.). | X | | | X | | |
| PEIO-7 | Agency will put forth reasonable efforts to distribute Program materials to its targeted audiences. Approximately one-half or more of the materials should be distributed within twelve months of receipt. | X | | | X | | |
| PEIO-8 | All reasonable attempts will be made by agency to responsibly track the number of Program educational materials distributed with sufficient accuracy and documentation to be able to demonstrate compliance with PEIO-7. Such documentation will be included in the agency's annual report. | X | | | X | | |
| STORM DRAIN INLET STENCIL/MARKINGS AND SIGNS | | | | | | | |
| PEIO-9 | Agency will have stenciled/marked (e.g., paint, thermoplastics, plaques, etc.) ninety percent of its agency-owned storm drain inlets; or, conducted activities that are demonstrably equivalent in terms of achieving awareness by residents that pollutants should not be disposed down storm drains. "Demonstrably equivalent" means the agency will provide examples of comparable alternative activities or have available a statistically valid survey to show its residents are as knowledgeable about storm drain pollution as residents in comparable communities who use markings, stencils or signs. A description of the "demonstrably equivalent" activities must be submitted in writing and approved in advance by the Regional Board's Executive Officer. This approval will be presumed unless disapproved in writing within 45 days of its submittal. | X | | | X | | |
| PEIO-10 | As a goal, all installed stencils, markings and signs will be sufficiently maintained to be readable. | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|---|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| AGENCIES' COMMUNITY OUTREACH PROGRAM | | | | | | | |
| PEIO-11 | <p>Participate in community outreach activities that are listed following this form, for the purpose of communicating the general stormwater pollution prevention messages and complementing the Program's specific message(s) for its targeted audience(s). Annually, agencies will participate in activities in the following manner:</p> <p><u>Over 100,000 in population</u></p> <ul style="list-style-type: none"> Agency will participate in four activities; <p><u>Between 50,000 and 100,000</u></p> <ul style="list-style-type: none"> Agency will participate in three activities. <p><u>Less than 50,000</u></p> <ul style="list-style-type: none"> Agency will participate in two activities. | X | | | X | | |
| PEIO-12 | <p>Increased outreach activities will be implemented in the following manner:</p> <p><u>Over 100,000 in population</u></p> <ul style="list-style-type: none"> Agency will participate in six activities during the third year of the Permit and eight activities in the fourth and fifth years of the Permit. <p><u>Between 50,000 and 100,000</u></p> <ul style="list-style-type: none"> Agency will participate in five activities during the third year of the Permit and six activities in the fourth and fifth years of the Permit. <p><u>Less than 50,000</u></p> <ul style="list-style-type: none"> Agency will participate in three activities in the third year of the Permit and four activities in the fourth and fifth years of the Permit. <p>Refer to the "Community Outreach Activities" list following this form, for description of community outreach activities. Additionally, one of the increased activities must be from the "F" Category – "Develop Watershed Awareness" to be conducted in the third and fifth years of the Permit.</p> | X | | | X | | |

| PS # | Description | Status | | | Evaluation ² | | |
|--|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| COORDINATION WITH PUBLIC SCHOOLS (K-12) | | | | | | | |
| PEIO-13 | Information provided by the Program about educational programs (e.g., Bay Saver Club, "Kids in Creeks" workshops, community stewardship grants, etc.), will be supported by agency and promoted to the public schools within its jurisdiction. | X | | | X | | |
| PEIO-14 | Agency will offer public schools within its jurisdiction computer programs, children's educational activity booklets, and other Program materials. This may include disseminating information on how to obtain copies of materials if this is a more efficient way to achieve distribution. | X | | | X | | |
| PEIO-15 | Agency, in conjunction with the Program, will work with the local school district to encourage appropriate stormwater pollution prevention and watershed resource information is taught to public school children within its jurisdiction. | X | | | X | | |
| NON-COMPLIANCE WITH PERFORMANCE STANDARDS | | | | | | | |
| PEIO-16 ^a | If performance standards are not met, then agency notifies the Regional Board and implements a plan to meet the standards as part of the annual report process. | | X | | | | |
| PEIO-17 ^b | If the Program conducts or receives a statistically valid survey identifying an inadequate level of awareness of stormwater related pollution and/or watershed resource problems in one or more of its agencies when compared to surrounding agencies, then the affected agency(ies) will identify and implement a program within one year to improve its performance in order to attain a level of understanding equivalent to that being achieved in comparable communities. | | X | | | | |

^a All PEIO Performance Standards have been implemented.

^b The Program conducted a Public Opinion Survey this fiscal year. Refer to Volume I, Section 4 for a detailed discussion on the purpose, scope and findings of this survey.

| PS # | Description | Status | | | Evaluation ² | | |
|----------------------------------|--|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| HOUSEHOLD HAZARDOUS WASTE | | | | | | | |
| PEIO-18 | Agency will individually support the Household Hazardous Waste Programs. | X | | | X | | |
| PEIO-19 | Agency will disseminate available materials and information encouraging County residents to properly dispose of their household hazardous wastes. | X | | | X | | |
| TRANSPORTATION MANAGEMENT | | | | | | | |
| PEIO-20 | Agency will individually participate in regional efforts encouraging the use of public transportation and other alternative modes of transportation. | X | | | X | | |
| PEIO-21 | Agency demonstrates efforts to promote public transportation by public employees where available and feasible. | X | | | X | | |
| PEIO-22 | Agency will evaluate the feasibility of using non-polluting fuels in public vehicles. | X | | | X | | |
| PEIO-23 | Agency will disseminate available materials and information to the public encouraging public transportation use and other alternative modes of transportation. | X | | | X | | |

1. A performance standard is "Modified" if: (a) it was or will be deleted; (b) the language or content of the performance standard was or will be changed; and/or (c) the implementation schedule for the performance standard was or will be changed.

An explanation of how the performance standard was or will be "Modified" is provided in the Qualitative Results form. The implementation status is provided in the "Modified Performance Standards" form.

2. An evaluation of the PSs' effectiveness is provided in the Qualitative Results form.

COMMUNITY OUTREACH ACTIVITIES

A. Participate in Existing Community Events – Distribute Program information by participating in existing community events (e.g., fairs, festivals, exhibits, etc.) held within its jurisdiction or nearby jurisdiction(s). This participation may include setting up of a booth, web page, kiosk display, or other creative means of communicating stormwater pollution prevention messages, using a specific message to a target group, or making a presentation to a local community service group.

B. Initiate New Community Events - Play a major role in planning and staging a community or citywide event. Examples include the following:

- Earth Day or other festival or fair;
- Business mixer;
- Seminar or target group; and/or
- Contest.

C. Contact Media and Conduct Advertising - Maintain local media contacts with local newspaper, radio, and television stations to communicate general stormwater pollution prevention messages, complement the Program's specific targeted audience(s) and message(s), and complement regional PEIO activities. Local media contact may include the adaptation and/or development and distribution of stormwater related press releases or the use of advertising in local publications.

D. Provide Program Information Through Other Outreach Activities - Other outreach activities may include, but not be limited to, the following items:

- Agency newsletter;
- Other agency newsletter;
- Local magazine;
- Utility bill inserts;
- Mailing to target group; and/or
- Computer bulletin board or network.

E. Develop and Implement Integrated Outreach Activities - Activities increasing the effectiveness of pollution prevention messages include, but are not limited to, the following items:

- Point of Purchase display and giveaway;
- Plan, create, and distribute videos;
- Create and stage a play;
- Develop special displays or kiosks for stormwater pollution related message(s) (e.g., interactive slides in movie theaters, etc.);
- Develop/implement program for school curriculum providing necessary equipment and/or supplies;
- Support and partner with other agencies to increase and/or improve pollution prevention capabilities (e.g., helping set up oil and/or antifreeze collection facilities);
- Make and place signs on sweepers or other vehicles; and
- Place messages on workers' tee shirts.

F. Develop Watershed Awareness – This area includes one or more of the following activities:

- Identify and support a Friends of a Watershed group, encourage creek cleanups (or if this is infeasible, lagoon or shoreline cleanups), Adopt-a-Creek or other volunteer monitoring and resource inventory activities;
- Conduct a creek lagoon, shoreline or wetland cleanup;
- Participate in a local event in its jurisdiction or neighboring jurisdiction(s) which may include the Coastal Commission's Annual Coastal Clean-up Day or Earth Day activities;
- Identify, support and implement educational programs (e.g., Kids in Creeks workshops, Environmental Action Challenge activities, etc.); and/or,
- Identify, support and implement public awareness activities due to natural occurrences (e. g., El Niño landslides, earthquakes, etc.).

Quantitative Results - Public Education & Industrial Outreach PSs

| AMOUNT OF PEIO MATERIALS DISTRIBUTED BY YOUR AGENCY | TOTAL |
|--|-------|
| Waste Disposal: | |
| “Clean It” Safer Housecleaning Methods that Really Work Guides | |
| “Get Rid Of It” A Painter’s Guide to Storage, Disposal and Clean-Up of Paint Waste Brochures | |
| Used Oil Recycling Program: | |
| Mr. Funnelhead Coloring Books (English Version) | |
| “Used Oil” Funnels | |
| Certified Oil Collection Centers Information Sheets | |
| Mr. Funnelhead School Education Brochures | |
| Mr. Funnelhead Public Education Brochures | |
| “Recycle Oil, It’s Right” Brochures (English Version) | |
| “Recycle Oil, It’s Right” Brochures (Spanish Version) | |
| Mr. Funnelhead Magnet 2002 | |
| Mr. Funnelhead Magnet 2003 | |
| Mr. Funnelhead New Magnet 2004 | |
| Mr. Funnelhead Erasers | |
| Mr. Funnelhead Pencils | |
| Mr. Funnelhead Tattoos | |
| Mr. Funnelhead Carrying Bags | |
| Promotional Items: | |
| Program Water Drop Pens | |
| Program Water Drop Erasers | |
| Program Water Drop Keychains | |
| Program Mini-Lifesavers | |
| Wildflowers Seed Packets | |
| “Hi. Mind if I pollute your water?” Brochures | |
| Sport Water Bottles | |
| Bent Pen – Fish | |
| Bent Pen – Flower Pot | |
| Program Auto Garbage Bags | |
| “Grow It” The Less Toxic Garden Guides | |
| A Kid’s Guide to Backyard Bugs | |
| Water is life. Rescue it. Gator Clips | 150 |
| Water is life. Rescue it. Coin Holders | 200 |

| AMOUNT OF PEIO MATERIALS DISTRIBUTED BY YOUR AGENCY | TOTAL |
|---|--------------|
| Water is life. Rescue it. Sponges | 150 |
| Water is life. Rescue it. Seed Bookmarks | |
| Water is life. Rescue it. Spray Bottles | |
| "Recycle" Rulers | 150 |
| General Information: | |
| "Mantenga Nuestros Aroyos, Belia DeltaLLimpios Para Nuestros Niños" Brochures | |
| "TIPS to Protect Our Restaurant & Keep Our Water Clean" Poster | |
| "TIPS to Protect Our Restaurant & Keep Our Water Clean" Brochures | |
| Don't Set a Table for Pests! Restaurant Brochures (English/Spanish Version) | |
| Pest Management/Pesticide Use: | |
| Controlling Ants in Your House – English and Spanish versions | |
| Controlling Aphids | |
| Controlling Snails and Slugs in Your Garden – English and Spanish versions | |
| Controlling Yellowjackets Around Your Home – English and Spanish versions | |
| Finding a Pest Control Company | 50 |
| How to Control Weeds | |
| Keeping Cockroaches Out of Your House – English and Spanish versions | |
| Keeping Fleas off Your Pets – English and Spanish versions | |
| Keeping Mosquitoes Away | |
| Naturally Managing Pests With a Healthy Garden | |
| Pesticides and Water Quality | 100 |
| Tips for a Healthy Beautiful Lawn – English and Spanish versions | |
| Safe Use and Disposal of Pesticides – English and Spanish versions | |
| Living with Spiders The Helpful Hunters – English and Spanish versions | |
| Wonderful Roses | |
| Media Outreach: | |
| Outdoor Billboards | |
| BART Rail Boards | |
| Bus Shelter Posters | |
| Bus Boards | |
| Theater Advertisements | |
| Public Service Announcements (Radio): | |
| Specify Station: | |
| Specify Station: | |
| Specify Station: | |

| AMOUNT OF PEIO MATERIALS DISTRIBUTED BY YOUR AGENCY | TOTAL |
|---|--------------|
| Public Service Announcements (Television/Cable): | |
| Specify Station: | |
| Specify Station: | |
| Specify Station: | |
| Public Service Announcements (Newspapers/Periodicals): | |
| Specify Publication: 110 Degrees Magazine | 7,000 |
| Specify Publication: Parks & Recreation Activity Guide - Summer | 6,700 |
| Specify Publication: | |
| Newspaper Advertisements: | |
| Specify Publications: Brentwood News | 7,000 |
| Specify Publications: Brentwood Press | 7,000 |
| Specify Publications: | |
| Community Newsletters: | |
| Specify Publications: City Newsletter – Summer 2003/2004 | 12,800 |
| Specify Publications: City Newsletter – Fall 2003 | 6,700 |
| Specify Publications: City Newsletter – Winter 2004 | 6,000 |
| Radio Advertisements: | |
| Specify Station: | |
| Specify Station: | |
| Television/Cable Advertisements | |
| Specify Station: | |
| Specify Station: | |
| Measurement/Research Activities: | |
| Public Opinion Surveys | |
| Focus Groups | |
| Workshops: | |
| Specify Subject: | |
| Specify Subject: | |
| Specify Subject: | |
| Public Outreach: | |
| 1-800-No Dumping Telephone Calls | |
| Public Speaking Engagements | |
| Other: | |

| AMOUNT OF PEIO MATERIALS DISTRIBUTED BY YOUR AGENCY | TOTAL |
|---|--------------|
| Other: | |
| Other: | |
| Number of Storm Drain Inlets Stenciled or Stamped By: | |
| Volunteers | |
| Municipal Staff | |
| Fish Door Hangers Distributed | |
| Amount of Household Hazardous Wastes Collected: | |
| Motor Oil (gallons) | 988 |
| Household Paint (gallons) | 2,300 |
| Pesticides (gallons) | 243 |
| Miscellaneous (gallons) (e.g., acids, antifreeze, batteries, etc.) | 2,448 |
| Transportation Management | |
| Number of Public Agency Vehicles Using Non-Polluting Fuels | |
| Number of Public Employees Using Public Transportation | |
| Number of Education Materials Encouraging Public Transportation Use | |
| Other | |
| Backyard Bugs guide | 500 |
| Grow It Guides | 500 |
| Neon Assorted Pencils with black imprint | 1,000 |
| Grow It Guides | 500 |
| Used Oil Containers | 1,000 |
| "Using Site Design Techniques to Meet Development Standards for Stormwater Quality" | 58 |
| | |

**NEW DEVELOPMENT & CONSTRUCTION CONTROLS
PERFORMANCE STANDARDS (PSs)**

NEW DEVELOPMENT & CONSTRUCTION CONTROLS

PERFORMANCE STANDARDS (PSs)

Municipality: City of Brentwood

Permit Year: Five (2003/2004)

Qualitative Results - New Development & Construction Controls PSs

Introduction:

The City of Brentwood issued 1,958 building permits between July 2003 and June 2004. This volume of construction has caused the New Development and Construction Control section of our MS4 permit to continue to be the primary focus relative to implementation. Code Enforcement has been actively engaged through the building department on a routine and on-call basis to assist construction and building inspectors with BMP compliance and tracking.

The City of Brentwood has formally adopted elements of the amendment to the group permit with Provision C.3. Specifically, the City has implemented Ordinance No. 670 which requires compliance with BMP guidelines or requirements adopted by any federal, regional, or county agency and addresses the requirement for a stormwater control plan in the development review process, and Ordinance No. 754 which expands construction and demolition debris recycling efforts. In addition, the concepts of Provision C.3 have been incorporated into the City's Standard Conditions of Approval with respect to permanent Structural BMP's and encouraging maximal use of permeable surfaces in all new developments.

The quantities reflected in the NDCC Quantitative Results forms are estimates based upon best professional judgment. Evidence of site inspections is available for each site with relevant information including project name and number, assigned project inspector, site contact, WDID number, availability of written SWPPP, season, type of work, comments and enforcement action, if any.

Implementation & Evaluation:

The City of Brentwood now has an Ordinance No. 754, effective October 1, 2003 which is intended to boost its rate of recycling and diversion beyond the currently achieved state-mandated goal of diverting 50 percent of its solid waste from landfills. Brentwood's new recycling ordinance for construction debris applies to all projects valued at \$75,000 or more. See City of Brentwood Standard Conditions of Approval for Tentative Subdivision Maps, Item No. 35, and for Commercial and Industrial Projects, Item No. 52, included as ***Attachment "J"***.

The City of Brentwood has implemented all of the New Development and Construction Control performance standards as of June 30, 2002. Some of these performance standards have been implemented at levels greater than required. The City currently requires Storm Water Pollution Prevention Plans on all sites of 1 acre or more or on projects resulting in 5,000 square feet or more of impervious area.

Erosion and sediment control and construction site inspections have been performed at the required intervals during both the rainy and non-rainy season. The inspections reflected on the NDCC Quantitative Results forms include inspections for each construction project performed at least once weekly and during pre-rain, rain and post-rain events, with documentation posted in daily logs and/or on recently implemented standard SWPPP inspection report forms. However, along with day-to-day construction quality control inspections, the City's construction and

building inspectors are trained to inspect each active construction site on a *daily* basis to comply with written project specific and industry standard SWPPP requirements and to ensure that BMP's are sufficiently maintained. As far as inactive sites are concerned, along with day-to-day inspection duties to ensure public safety and access, it is also the City inspector's responsibility to ensure frequent site visits include BMP maintenance and avoidance of illicit discharge. In addition, each City inspector is responsible to ensure that each developer performs his own project SWPPP inspections at required intervals and during pre-rain, rain and post-rain events, with documentation reflected on standard forms typically attached with each certified SWPPP.

In conformance with the RWQCB's modification of the Municipal Separate Storm Sewer System (MS4) permit, all new development in the City of Brentwood is now required to implement water quality measures that will retain on-site all new run-off to less than historical flows. If on-site detention to this level is infeasible, other methods must be utilized to capture and treat approximately 80% of all run-off prior to discharge into a public storm drain, creek or other drainage system. The City has issued a booklet, *Using Site Design Techniques to Meet Development Standards for Stormwater Quality*, to local developers, engineers, architects and other interested organizations. This booklet provides guidance for sizing acceptable water quality measures and is intended to work in conjunction with design parameters discussed in the book distributed by BASMAA, *Start at the Source*. See City of Brentwood memorandum and distribution list regarding New Water Quality Requirements Sizing Criteria, dated February 26, 2004, included as **Attachment "E"**, and above noted booklet included as **Attachment "F"**.

The City of Brentwood requires the installation of structural pre-treatment units on all commercial sites, major residential sites and clusters of small subdivisions. There are currently 23 pre-treatment units installed within private developments and the public right-of-way. Additionally, each commercial site is required to install an inlet in every trash enclosure that discharges to the sanitary system or, if discharging to the storm drain system, has fossil filter cartridges installed.

The number of staff that is responsible for implementation of the NDCC Performance Standards includes at least 4 Planners, 1 Code Enforcement Officer, 3 plan checkers and 6 construction inspectors.

The City of Brentwood is participating in the development of the C.3 Guidebook, which will be incorporated into our development plan review and permitting process.

The designated representative responsible for overall implementation of the New Development and Controls component of the Stormwater Management Plan is Eunejune Kim. Eunejune is responsible to ensure that permanent design and temporary construction BMP controls are incorporated in the new development plan review and permitting process. The designated representative to act as a liaison with the New Development & Construction Controls Committee will be Jeff Cowling. Jeff is responsible that these controls are carried out and maintained during construction and that specified permanent controls are installed in accordance with the approved design.

See *City of Brentwood Standard Conditions of Approval for Tentative Subdivision Maps*, Item No's. 12, 14, 27, 28, 29, 50, 52, 57, 61, 74, 99 & 107, and for *Commercial and Industrial Projects*, Item No's. 9, 10, 34, 35, 36, 37 & 51, relating to temporary construction and permanent stormwater controls for new development, included as **Attachment "J"**.

Modifications:

In conformance with the RWQCB's modification of the Municipal Separate Storm Sewer System (MS4) permit, all new development in the City of Brentwood is now required to implement water

quality measures that will retain on-site all new run-off to less than historical flows. If on-site detention to this level is infeasible, other methods must be utilized to capture and treat approximately 80% of all run-off prior to discharge into a public storm drain, creek or other drainage system. See City of Brentwood memorandum and distribution list regarding New Water Quality Requirements Sizing Criteria, dated February 26, 2004, included as **Attachment "E"**.

Fiscal Year 2004/2005 Goals:

Although the City of Brentwood is currently implementing all of the required performance standards, there are several items needing improved documentation. These standard forms were implemented mid-year and it is the City's goal to enforce documentation in a consistent manner on these standard forms to ensure more accurate tracking. New forms have been developed and distributed in an attempt to increase the documented inspections by making them less cumbersome. These forms have been included as Attachments "A" and "B"

In accordance with Procedure C.3.e, an Operation & Maintenance Verification Program for treatment measures is required. Initially all, all structural BMP's will be plotted and stored in the City of Brentwood's Intranet Map Room with links to the location, type, size, model, depth, installation date, warranty expiration date and scheduled maintenance. As all of these units have been installed only recently, development of the maintenance and verification program will be refined as the warranty periods for installation of these units expire. The City has, however, established a Community Facilities District budget for maintenance when the developer warranties expire.

As the City of Brentwood is currently experiencing unprecedented growth from new development and construction, it is appropriate that the City designate offsite areas for compensatory mitigation where sufficient site planning measures may not be feasible. The City currently has a substantial supply of undeveloped land within its boundaries that qualifies as productive agricultural land. The City has recently adopted an Agricultural Enterprise Program which includes a component to compensate property owners, through agricultural conversion mitigation fees, for voluntarily retaining their land in an undeveloped state in perpetuity through conservation easements. This will provide another opportunity to retain permeable land and create drainage basins to mitigate for the lack of treatment BMP's at other development sites while reducing or eliminating agricultural source pollution. A "Regional Stormwater Facility" funded by compensatory mitigation would create another vehicle to support the Agricultural Enterprise Program.

Because the City of Brentwood is experiencing development growth at a rate exceeding any of the other cities covered by the group permit, we have decided to become a representative on the NDCC Committee.

Performance Standard Status – New Development & Construction Controls PSs

| <i>PS #</i> | <i>Description</i> | <i>Status</i> | <i>Evaluation²</i> |
|-------------|--------------------|---------------|-------------------------------|
|-------------|--------------------|---------------|-------------------------------|

| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
|--|---|-------------|----------------|-----------------------|-----------|---------|---------------|
| MEASURES AND POLICIES TO CONTROL THE QUALITY OF STORMWATER RUNOFF | | | | | | | |
| NDCC-1 | Provide ongoing review of existing legal authorities provided in erosion control and stormwater ordinances to implement General Plan policies and authorize discretionary review of development projects. If necessary, amend existing ordinance(s) or develop and adopt new ordinance(s). | X | | | X | | |
| NDCC-2 | Incorporate policies and implementation measures into the General Plan, when amended, to help preserve and enhance water quality and protect sensitive areas. | X | | | X | | |
| NDCC-3 ^a | Implement programs based on Regional Board's Staff Recommendations to the maximum extent practicable. Such programs are intended to achieve a similar or higher standard for protection of water quality including habitat protection in sensitive areas. Demonstrate alternative programs if agency disagrees with the Regional Board's Staff Recommendations. | | X | | | | |
| NDCC-4 ^b | Continue to improve performance standards within the permit period in response to upcoming Regional Board's Staff Recommendations and other relevant technical information to the maximum extent practicable | | X | | | | |

DEVELOPMENT PLAN REVIEW AND PERMITTING

| | | | | | | | |
|--------|---|---|--|--|---|--|--|
| NDCC-5 | Evaluate the effect of development on stormwater runoff and wetlands in the California Environmental Quality Act (CEQA) review process (e.g., use a revised checklist). | X | | | X | | |
|--------|---|---|--|--|---|--|--|

^a Originally developed in fiscal year 1997/98, this Performance Standard and the San Francisco Bay Regional Water Quality Control Board's 5 April 1994 *Staff Recommendations for New and Redevelopment Controls for Stormwater Programs (Staff Recommendations)* have been replaced by the subsequent adoption of new more stringent requirements controlling stormwater discharges associated with (1) construction sites and (2) areas of new development and redevelopment. For a detailed report on these new requirements, please refer to Volume I, Section 3 of this report.

^b When developed in fiscal year 1997/98, this Performance Standard anticipated an update to the San Francisco Bay Regional Water Quality Control Board's 5 April 1994 *Staff Recommendations for New and Redevelopment Controls for Stormwater Programs (Staff Recommendations)*. However, the subsequent adoption of more stringent requirements for controlling stormwater discharges associated with construction sites and areas of new development and redevelopment have effectively replaced the 1994 *Staff Recommendations*, and the Regional Board staff's plans to prepare an update. For a detailed report on these new requirements, please refer to Volume I, Section 3 of this report.

| PS # | Description | Status | | | Evaluation ² | | |
|-----------|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| NDCC-6 | Require stormwater quality control measures during and after construction of municipal capital improvement projects, as appropriate. Incorporate appropriate control measures in project documents, such as plans and contract specifications. | X | | | X | | |
| NDCC-7 | Require developers and owner/builders to control stormwater quality impacts of their projects during construction. Require developers of projects with significant stormwater pollution potential to mitigate impacts through site planning and design practices and/or installing stormwater treatment controls. | X | | | X | | |
| NDCC-8 | Incorporate the Contra Costa Clean Water Program's model development conditions of approval into standards for development to the maximum extent practicable. | X | | | X | | |
| NDCC-9 | Require developers and owner/builders of projects that include permanent structural stormwater controls to ensure ongoing operation and maintenance of such controls, as part of project approval documents, as appropriate. | X | | | X | | |
| NDC3-a.i. | Ensure access to treatment measures to Contra Costa Mosquito and Vector Control District staff. | X | | | X | | |
| NDCC-10 | Develop and implement appropriate design guidelines and practices (e.g., BASMAA's "Start at the Source" document), which incorporate water quality protection measures for both public and private projects. | X | | | X | | |
| NDCC-11 | Require private and public development projects to include permanent stormwater quality controls, as appropriate, if sufficient site planning measures are not implemented or feasible. | X | | | X | | |

EROSION AND SEDIMENT CONTROL

| | | | | | | | |
|---------|---|---|--|--|---|--|--|
| NDCC-12 | Maintain an erosion control program that includes requirements for minimum BMPs, sufficient enforcement authority, training and tools for inspectors, and information for developers and contractors. | X | | | X | | |
|---------|---|---|--|--|---|--|--|

| PS # | Description | Status | | | Evaluation ² | | |
|--|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| CONSTRUCTION SITE FIELD INSPECTIONS | | | | | | | |
| NDCC-13 | Prior to construction of any project needing permits, proof of coverage (i.e., under the General Construction Activity Storm Water Permit promulgated by the State Water Resources Control Board, Army Corps 404 Permit, Regional Water Quality Control Board's 401 Water Quality Certification, etc.) will be required. Require developers to prepare, submit to the agency for review and approval, and implement an effective erosion and sediment control plan or similar administrative document that contains erosion and sediment control provisions during the construction period. | X | | | X | | |
| NDCC-14 | Inspect construction sites for adequacy of stormwater quality control measures on a regular basis. Frequency of inspections will be based on considerations such as the size of the project, its potential impact on stormwater quality, and the amount of construction activity. | X | | | X | | |
| NDCC-15 | For construction sites requiring erosion and/or sediment control plans, inspect sites prior to the beginning of the wet season each year to ensure measures will be taken to prevent erosion and minimize discharges of sediment from disturbed areas. Submit documentation by October 15 of each year that all sites issued grading permits have been inspected by September 30 for compliance with erosion control best management practices. | X | | | X | | |
| NDCC-16 | Inspectors review Storm Water Pollution Prevention Plans, if applicable, prior to conducting inspections. | X | | | X | | |

| | | | | | | | |
|---------|---|---|--|--|---|--|--|
| NDCC-17 | <p>During inspections, inspectors will:</p> <ul style="list-style-type: none"> ➤ Inspect and prohibit non-stormwater discharges to the maximum extent practicable, except those discharges that contain no pollutants; | X | | | X | | |
|---------|---|---|--|--|---|--|--|

| PS # | Description | Status | | | Evaluation ² | | |
|--|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| | <ul style="list-style-type: none"> ➤ Whenever possible, visually observe the quality of stormwater runoff during and after a major storm event; and, ➤ Require proper implementation and maintenance of erosion control and materials/waste management BMPs (e.g., covering stockpiled materials, and designating work and storage areas) to minimize the discharge of pollutants. | | | | | | |
| NDCC-18 | If appropriate, inspectors will require problems to be corrected and document illicit discharges (or contact their Illicit Discharge Coordinator) so that illicit discharges are reported in the Annual Report. | X | | | X | | |
| NDCC-19 | For construction sites requiring erosion control plans, ensure a self-inspection program by the developer is implemented or inspect all priority construction sites within 7 days following each significant storm event or series of events during the wet season of each year to evaluate the effectiveness of erosion and sediment control measures, and, if necessary, require additional erosion protection measures be implemented. | X | | | X | | |
| COORDINATION WITH THE CONTRA COSTA COUNTY FLOOD CONTROL & WATER CONSERVATION DISTRICT (FCD) | | | | | | | |
| NDCC-20 ^c | The New Development & Construction Controls Committee, on behalf of all co-permittees, will continue discussing with the FCD policies regarding the operation and maintenance of new flood control facilities to maximize stormwater quality control benefits. | | X | | | | |
| NDCC-21 | Study and, if appropriate, implement operation and maintenance procedures for new flood control facilities, which maximize stormwater quality controls. | X | | | X | | |
| EDUCATIONAL ACTIVITIES | | | | | | | |
| NDCC-22 | Provide educational materials (e.g., BMP flyers, "Blueprint for a Clean Bay", Construction Site BMP plan sheet, etc.) to municipal staff, developers, contractors, construction site operators, and owners/builders, as appropriate. | X | | | X | | |

^c See Volume I, Section 3 for a detailed discussion regarding New Development & Construction Controls Committee's discussions with the Contra Costa County Flood Control & Water Conservation District.

| PS # | Description | Status | | | Evaluation ² | | |
|---|---|-------------|----------------|-----------------------|-------------------------|---------|---------------|
| | | Implemented | Not Applicable | Modified ¹ | Effective | Unknown | Not Effective |
| NDCC-23 | Educate staff responsible for development plan review and permitting of stormwater quality issues and controls. | X | | | X | | |
| NDC3-a.ii. | Provide and/or reference available educational materials (e.g., "Start at the Source", California BMP Handbooks (2003 Edition), and Provision C.3 requirements and guidance) to municipal staff, developers, contractors, construction site operators, and owners/builders, early in the planning process and as appropriate. | X | | | X | | |
| COMMITTEE MEETINGS AND WORKSHOPS | | | | | | | |
| NDCC-24 | Educate construction site inspectors on the proper implementation and maintenance of erosion and sediment controls and materials/waste management BMPs. | X | | | X | | |
| NDCC-25 | At least one agency representative attends CCCWP new development and construction controls workshops. | X | | | X | | |
| NDCC-26 | In addition to the representative assigned to the Contra Costa Clean Water Program, designate a person responsible for implementing the New Development and Construction Controls component of the SWMP and for acting as a liaison with the New Development & Construction Controls Committee. | X | | | X | | |

1. A performance standard is "Modified" if: (a) it was or will be deleted; (b) the language or content of the performance standard was or will be changed; and/or (c) the implementation schedule for the performance standard was or will be changed.

An explanation of how the performance standard was or will be "Modified" is provided in the Qualitative Results form. The implementation status is provided in the "Modified Performance Standards" form.

2. An evaluation of the PSs' effectiveness is provided in the Qualitative Results form.

Quantitative Results - New Development & Construction Controls PSs

| <i>Description</i> | <i>Industrial Projects</i> | <i>Commercial Projects</i> | <i>Residential Projects</i> | <i>Total</i> |
|--|----------------------------|----------------------------|-----------------------------|--------------|
| Development Plan Review and Permitting | | | | |
| Number of New and Redevelopment Projects ¹ Issued a Permit to Begin Construction | | 11 | 21 | 32 |
| Number Incorporating Permanent Structural Stormwater Quality Control Measures | | 10 | 4 | 14 |
| Number Incorporating Site Planning and Design Measures for Stormwater Quality Protection | | 1 | 21 | 21 |
| Number of Municipal Capital Improvement Projects ² Awarded Contracts | | 5 | | 5 |
| Number Implementing Stormwater Quality Control Measures during Construction | | 3 | | 3 |
| Number Incorporating Stormwater Quality Control Measures after Construction | | 3 | | 3 |
| Construction Site Erosion and Sediment Control | | | | |
| Number of Construction Projects ³ | | 13 | 26 | 39 |
| Number of Construction Projects that were inactive or active during the rainy season ⁴ . | | 13 | 24 | 37 |
| Number of Projects Requiring (a) Proof of Coverage under the State's General Construction Permit, and (b) Submittal of a Stormwater Pollution Prevention Plan (SWPPP) ⁵ | | 13 | 26 | 39 |

¹Discretionary projects constructed in a "Sensitive Area" and/or is five (5) acres or greater in disturbed area. For a definition of "Sensitive Area," refer to Section 3, Attachment B of the Stormwater Management Plan.

²Capital Improvement Projects resulting in a land disturbance of five (5) acres or more.

³Construction projects requiring a grading permit and/or an erosion and sediment control plan.

⁴Construction projects requiring a grading permit and/or erosion and sediment control plan, which were either inactive or active during the rainy season. The rainy season is October 15th to April 1st or as defined by agency's local ordinance.

⁵Construction projects resulting in a land disturbance of one (1) acre or more.

| <i>Description</i> | <i>Industrial Projects</i> | <i>Commercial Projects</i> | <i>Residential Projects</i> | <i>Total</i> |
|--|--------------------------------|--------------------------------|---------------------------------|--------------|
| Construction Site Inspections | | | | |
| Number of Pre-Rainy Season Construction Site Inspections Conducted and Reported to the San Francisco Bay and/or Central Valley Regional Water Quality Control Board(s) | | 13 | 24 | 37 |
| Total Number of Rainy Season Inspections Conducted | | 406 | 1160 | 1566 |
| Average ⁶ Number of Rainy Season Inspections Conducted Per Site | | 58 | 58 | 116 |
| Number of Rainy Season Inspections to the Least Visited Site | | 28 | 45 | 73 |
| Number of Rainy Season Inspections to the Most Visited Site | | 103 | 103 | 206 |
| Number of Dry Season Inspections Conducted | | 238 | 680 | 918 |
| Number of Enforcement Actions Taken: | | | | |
| Written Corrective Measures | | 24 | 147 | 171 |
| Notices to Comply | | 8 | 61 | 69 |
| Stop Work Orders | | 2 | 1 | 3 |
| Notices of Violation | | 9 | 35 | 44 |
| Fines | | 5 | 50 | 55 |
| Other: | | | | |

⁶The average number of rainy season inspections conducted is calculated by dividing the "Total Number of Rainy-Season Inspections Conducted" by the total "Number of Construction Sites that were inactive or active during the rainy season".

| <i>Description</i> | <i>Industrial Projects</i> | <i>Commercial Projects</i> | <i>Residential Projects</i> | <i>Total</i> |
|---|----------------------------|----------------------------|-----------------------------|--------------|
| Education Activities | | | | |
| Number of New Development and Construction Control Education Materials Distributed: | | | | |
| BMP's for the Construction Industry Pamphlet | | | | |
| "Blueprint for a Clean Bay" Booklet | | | | |
| "Builders Guide to Reuse and Recycling" | | | | |
| "Start at the Source" Manual | | | | 57 |
| Construction Site BMP Plan Sheet | | | | |
| "Yes" / "No" 5x8 Cards | | | | |
| Other: | | | | |
| Number of Employees Attending New Development and/or Construction Training/Workshops: | | | | |
| Municipal Training/Workshops | | | | 7 |
| Program\SFBRWQCB Training/Workshops | | | | |
| Other: | | | | |

**MUNICIPAL STORMWATER PROGRAM
BUDGET SUMMARY**

Municipality: City of Brentwood

| Activity | Fiscal Year 03/04 Estimated Full-Time Equivalent Staff ⁽¹⁾ | Fiscal Year 03/04 Budgeted | Fiscal Year 03/04 Estimated | Fiscal Year 04/05 Budgeted |
|--|--|----------------------------------|-----------------------------------|----------------------------------|
| A. New Development & Construction Controls | 1.0 | \$ 142,590 | \$ 145,243 | \$ 159,778 |
| B. Public Education & Industrial Outreach | 0.1 | \$ 17,460 | \$ 19,703 | \$ 21,673 |
| C. Municipal Maintenance | 6.0 | \$ 392,700 | \$ 392,700 | \$ 431,970 |
| D. Inspection | 0.1 | \$ 5,775 | \$ 5,775 | \$ 6,353 |
| E. Illicit Discharge Control | 0.35 | \$ 15,000 | \$ 80,850 | \$ 90,000 |
| F. Monitoring | N/A | N/A | N/A | N/A |
| G. Special Studies | N/A | N/A | N/A | N/A |
| H. Watershed Management | N/A | N/A | N/A | N/A |
| I. Agency Administration | 0.5 | \$ 58,220 | \$ 58,220 | \$ 64,042 |
| J. Group Program (Program Administration, Monitoring, Specialist Studies, Watershed Activities, & Public Education) | N/A | \$ 58,950 | \$ 58,950 | \$ 83,667 |
| K. Stormwater Utility Assessment Administration | N/A | \$ 0 | \$ 0 | \$ 0 |
| TOTAL | 8.05 | \$ 690,695 | \$761,441 | \$ 857,483 |

(1) A full-time equivalent (FTE) staff person works an average of 1,700 hours per year assuming a 40-hour workweek, sick leave, holidays and vacation.

level in order to manage the program, but is looking into hiring a third party firm to monitor and inspect private BMP's within the City's jurisdiction. The City has, however, established a Community Facilities District budget for maintenance when the developer warranties expire.

Forms developed by the City for weekly inspections/minor corrective actions, for more extensive inspections during a rain event and a pollution investigative report are included in the appendix as **Attachments "A" and "B"**, respectively.

Public Education and Industrial Outreach

The City of Brentwood has distributed 4,358 pieces of Contra Costa Clean Water Program literature and other informative items, including 1,000 6-quart used-oil recycling containers during the city's annual CornFest sponsored by the Chamber of Commerce in July. As our supply did not last until the end of the event, the City will order a larger quantity for next year's festival, as well as a supply available for pick up by anyone on demand. Information on free hazardous material drop off and the availability of the used oil containers will again be published in future additions of *Hometown News*, the newsletter prepared under the direction of the City Manager's office.

Other public outreach articles that have appeared recently in *Hometown News* which have discussed programs and efforts which eventually result in a reduction of water pollution have included topics such as *Household Hazardous Waste Collection Center Location, Rebates for Electric Grasscycling Lawn Mowers, Treated Water from Waste Water Treatment Plant Outfalling to Marsh Creek, Solid Waste Diversion nears 50%, Free Clean up Day for Residents Announced, Free Leaf Bags to Avert Clogged Gutters, Solid Waste Hotline for Extra Pickups, Annexed Area to Receive Garbage Service, New Ordinance Expected to Boost Recycling of Construction Debris, Cub Scouts & Parents Join in Cleanup of Marsh Creek and, Honor Students Adopt-a-Roadway Cleanup.*

Copies of the articles included in these newsletters are included as **Attachment "C"**. An information pamphlet, *Future Solutions Now, You Can Keep Our Creeks, the Bay and Delta Clean*, is included as **Attachment "D"**.

Approximately 321 storm drain inlets have been stenciled/marked with the "No Dumping" message in or around new or modified public and private facilities during the reporting period.

Municipal Maintenance

The City of Brentwood's Public Works Department mechanically sweeps every curbed street weekly. Heavily traveled bike paths and vehicular thoroughfares are often swept twice weekly. During the reporting period, the City Public Works Department swept at least 18,424 miles of curbed street accounting for 1,982 cubic yards of material prevented from entering the City's storm drain system, including 385 pounds of copper, 385 pounds of lead, 14,131 pounds of total petroleum hydrocarbons and 3,212 tons of sediment. Due to the high volume of construction activity within the City and its outskirts, additional mechanical sweeping was performed in the public right-of-way and within private developments that drain into the City's storm drain system at various intervals. The number of publicly owner storm drain facilities inspected and cleaned by the Public Works Department includes 3,175 inlets, 38 culverts, 10 V-ditches and 1 pump station accounting for 743 cy of material removed from inlets, 318 cy from culverts and 32 cy from V-ditches, with 163 pounds of copper, 333 pounds of lead and 5,883 pounds of total petroleum hydrocarbons removed. In addition, there were 52 maintenance inspections of pump stations during the reporting period.

The City of Brentwood does not use any pesticides or fertilizers containing copper or diazinon. Maintenance personnel have been aware of clean water issues and have been responsible for notifying the City's program coordinator on several occasions when illegal discharges have been identified. The maintenance crews have been instrumental in preventing these discharges from reaching the creeks by blocking the flow downstream and removing the contaminated discharge from the City's storm drain system.

The City of Brentwood operates a 4.5 mgd wastewater treatment plant (WWTP) under Order No. 5-00-171 NPDES No. CA0082660. This order requires the construction and use of a reclaimed water system. The non-potable water supply system is now functionally complete but a permit for use in public landscape/park irrigation and street sweeping remains pending.

Inspection Activities

The City of Brentwood Public Works Department and Code Enforcement conducted 129 total facility and business activity inspections during the reporting period. Code Enforcement has issued 17 enforcement actions during the reporting period, including 7 NOV's, 9 citations and 1 NTC, with 50 follow ups for various businesses and work performed at residences.

The most prevalent non-stormwater discharges from businesses and residences inspected during the reporting period include general debris, concrete residue and malodorous/colorful substances. It appears that pool companies have been a major contributor to these discharges with multiple violations from individual companies. Documenting these repeat offenders has helped in eliminating discharges through proactive inspections of the activities by these companies.

The City Public Works Department is beginning to map the storm drain systems and to create a data base for inspection and tracking of each new and existing facility. Public Works is currently evaluating the staffing requirements with respect to the enhanced operation & maintenance verification program requirements. Public Works will also adapt its maintenance program to inspect privately owned structural pretreatment units to ensure that adequate maintenance has been performed by the owners, as well as inspect and clean all publicly owned units on a regular basis, including a written procedure to comply with the inspection performance standards for priority businesses.

Illicit Discharge Control Activities

The City of Brentwood has issued a total of 168 enforcement actions for illicit discharges from construction related activities at new and existing residential, commercial and industrial establishments during the reporting period. Code Enforcement has performed 50 follow-up inspections to ensure that illicit discharges are avoided at high risk areas and activities. Pool companies performing residential construction activities in hilly subdivisions are a particular focus of concern and target of follow-up.

The engineering department has compiled GIS data accurately reflecting the location of most public improvements. New developments are required to submit electronic data reflecting locations of all infrastructure including, but not limited to, roads, sidewalks, fire hydrants, electroliers, sewer, water and storm drain locations. This allows the mapping division to keep the maps current. All storm drains 18" diameter and above will be incorporated into our GIS system within the next six months.

Several meetings have been held with engineering, police, public works and code enforcement staff to identify a process that is comprehensive and can be implemented. Purchase of an intranet server will allow central tracking of all incidents of illicit discharge as well as being able to map the locations for identifying hot spots throughout the city.