



CITY OF HERCULES

111 CIVIC DRIVE, HERCULES, CA 94547

PHONE: 510 • 799 • 8200

February 1, 2012

Bruce H. Wolfe, Executive Officer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Ms. Pamela Creedon, Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Dear Mr. Wolfe and Ms. Creedon:

Enclosed is the City of Hercules' Short-Term Trash Reduction Plan submitted in accordance with Provision C.10.a. in NPDES Permit No. CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board, and/or NPDES Permit No. CA0083313 issued by the Central Valley Regional Water Quality Control Board.

I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

Steve Duran, City Manager
City of Hercules

Baseline Trash Load and Short-Term Trash Load Reduction Plan



Submitted by:

CITY OF HERCULES

111 CIVIC DRIVE

HERCULES, CA 94547

In compliance with Provisions C.10.a(i) and C.10.a(ii) of Order R2-2009-0074

February 1, 2012

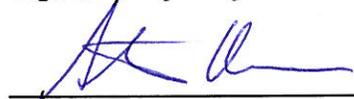
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**CITY OF HERCULES
SHORT-TERM TRASH LOAD REDUCTION PLAN**

CERTIFICATION STATEMENT

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature by Duly Authorized Representative:



Steve Duran
City Manager



Date

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ABBREVIATIONS

BASMAA	Bay Area Stormwater Management Agencies Association
BID	Business Improvement District
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CASQA	California Stormwater Quality Association
CDS	Continuous Deflection Separator
CEQA	California Environmental Quality Act
CY	Cubic Yards
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
GIS	Geographic Information System
MRP	Municipal Regional Stormwater NPDES Permit
MS4	Municipal Separate Storm Sewer System
NGO	Non-Governmental Organization
NPDES	National Pollutant Discharge Elimination System
Q	Flow
SFRWQCB	San Francisco Regional Water Quality Control Board
SWRCB	State Water Resource Control Board
TMDL	Total Maximum Daily Load
USEPA	United States Environmental Protection Agency
Water Board	San Francisco Regional Water Quality Control Board
WDR	Waste Discharge Requirements

PREFACE

This Baseline Trash Load and Short-Term Trash Load Reduction Plan (Plan) is submitted in compliance with provision C.10.a(i) and C.10.a(ii) of the Municipal Regional Stormwater NPDES Permit (MRP) for Phase I communities in the San Francisco Bay (Order R2-2009-0074). This Plan was developed using a regionally consistent format developed by the Bay Area Stormwater Management Agencies Association (BASMAA). Based on new information that becomes available during the implementation of this Short-Term Plan (e.g., revisions to baseline loading estimates or load reduction credits of quantification formulas), the City of Hercules may choose to amend or revise this Plan. If revisions or amendments are necessary, a revised Short-Term Plan will be submitted to the Water Board via the City of Hercules' annual reporting process.

1.0 INTRODUCTION

The Municipal Regional Stormwater NPDES Permit for Phase I communities in the San Francisco Bay (Order R2-2009-0074), also known as the Municipal Regional Permit (MRP), became effective on December 1, 2009. The MRP applies to 76 large, medium and small municipalities (cities, towns and counties) and flood control agencies in the San Francisco Bay Region, collectively referred to as Permittees. Provision C.10 of the MRP (Trash Load Reduction) requires Permittees to reduce trash from their Municipal Separate Storm Sewer Systems (MS4s) by 40 percent before July 1, 2014.

Required submittals to the San Francisco Bay Regional Water Quality Control Board (Water Board) by February 1, 2012 under MRP provision C.10.a (Short-Term Trash Loading Reduction Plan) include:

1. (a) Baseline trash load estimate, and (b) description of the methodology used to determine the load level.
2. A description of the Trash Load Reduction Tracking Method that will be used to account for trash load reduction actions and to demonstrate progress and attainment of trash load reduction levels.
3. A **Short-Term Trash Loading Reduction Plan** that describes control measures and best management practices that will be implemented to attain a 40 percent trash load reduction from its MS4 by July 1, 2014;

This Short-Term Trash Load Reduction Plan (Short-Term Plan) is submitted by the City of Hercules in compliance with the portions of MRP provision C.10.a.i listed as 1a and 3 above. In compliance with 1b, BASMAA submitted a progress report on behalf of Permittees that briefly describes the methodologies used to develop trash baseline loads (BASMAA 2011a). These methods are more fully described in BASMAA (2011b, 2011c). Lastly, the *Trash Load Reduction Tracking Method Technical Report* (BASMAA 2011d) was submitted by BASMAA on behalf of Permittees in compliance with submittal 2 described above. The Baseline Loading Rates and Tracking Method projects are briefly described below.

Baseline Trash Generation Rates Project

Through approval of a BASMAA regional project, Permittees agreed to work collaboratively to develop a regionally consistent method to establish baseline trash loads from their MS4s. The project, also known as the *BASMAA Baseline Trash Generation Rates Project* assists Permittees in establishing a baseline to demonstrate progress towards MRP trash load reduction goals (i.e., 40 percent). The intent of the project was to provide a scientifically-sound method for developing (default) baseline trash generation rates that can be adjusted, based on Permittee/site specific conditions; and used to develop baseline loading rates and loads. Baseline loads form the reference point for comparing trash load reductions achieved through control measure implementation.

Baseline trash loading rates are quantified on a volume per unit area basis and based on factors that significantly affect trash generation (e.g., land use, population density, and economic profile). The method used to establish baseline trash loads for each Permittee builds off “lessons learned” from previous trash loading studies conducted in urban areas (Allison and Chiew 1995; Allison et al. 1998; Armitage et al. 1998; Armitage and Rooseboom 2000; Lippner et al. 2001; Armitage 2003; Kim et al. 2004; County of Los Angeles 2002, 2004a, 2004b; Armitage 2007). The method is based off a conceptual model developed as an outgrowth of these studies (BASMAA 2011b). Baseline trash loading rates were developed through the quantification and characterization of trash captured in Water Board recognized

full-capture treatment devices installed in the San Francisco Bay area. Methods used to develop trash baseline loading rates are more fully described in BASMAA (2011b, 2011c, and 2012).

Trash Load Reduction Tracking Method Summary

The trash load reduction tracking method, described in the *Trash Load Reduction Tracking Method Technical Report*, assists Permittees in demonstrating progress towards reaching trash load reduction goals defined in the MRP (e.g., 40 percent). The tracking method is based on information gained through an extensive literature review and Permittee experiences in implementing stormwater control measures in the San Francisco Bay Area. The literature review was conducted to evaluate quantification methods used by other agencies to assess control measure effectiveness or progress towards quantitative goals. Results are documented in the *Trash Load Reduction Tracking Method: Technical Memorandum # 1 – Literature Review* (BASMAA 2011d).

Methods attributable to specific trash control measures fall into two categories: 1) trash load reduction quantification formulas; and 2) load reduction credits (BASMAA 2011e). Quantification formulas were developed for those trash control measures that were deemed feasible and practical to quantify load reductions at this time. Load reduction credits were developed for all other control measures included in the methodology development. Both categories of methods assume that as new or enhanced trash control measures are implemented by Permittees, a commensurate trash load reduction will occur. Progress towards load reduction goals will be demonstrated through comparisons to established trash baseline load estimates developed through the BASMAA *Baseline Generation Rates Project*.

Short-Term Trash Load Reduction Plan

The purpose of this Short-Term Plan is to describe the current level of implementation of control measures and best management practices, and identify the type and extent to which new or enhanced control measures and best management practices will be implemented to attain a 40 percent trash load reduction from their MS4 by July 1, 2014. The Short-Term Plan was developed using a template created by BASMAA through a regional project. New and enhanced trash control measures (i.e., Best Management Practices) that Permittees may implement to demonstrate trash load reduction goals are included in Table 1.1. This list was developed collaboratively through the BASMAA Trash Committee, which included participation from Permittee, stormwater program, Water Board and non-governmental organization (NGO) staff. The list of control measures is based on: 1) the potential for Permittees to implement; 2) the availability of information required to populate formulas and develop credits; and 3) the expected benefit of implementation. Load reductions associated with each control measure are demonstrated either through a quantification formula (QF) or credits (CR) described in the *Trash Load Reduction Tracking Method Technical Report* (BASMAA 2011e).

In efforts to reduce trash discharged from MS4s, Permittees may choose to implement control measures that are not included in Table 1.1 or described more fully in BASMAA (2011e). If a Permittee chooses to do so, methods specific to calculating trash load reductions for that control measure would need to be developed. Additionally, at that point, consideration should be given to updating this Short-Term Plan.

Additionally, based on new information that becomes available during the implementation of this Short-Term Plan (e.g., revisions to baseline loading estimates or load reduction credits of quantification formulas), the City of Hercules may amend or revise this Plan. If revisions or amendments are necessary,

a revised Short-Term Plan will be submitted to the Water Board via the City of Hercules' annual reporting process.

Table 1.1. Trash control measures for which load reduction quantification credits or formulas were developed to track progress towards trash load reduction goals.

Load Reduction Credits
Single-use Carryout Plastic Bag Ordinances
Polystyrene Foam Food Service Ware Ordinances
Public Education and Outreach Programs
Activities to Reduce Trash from Uncovered Loads
Anti-Littering and Illegal Dumping Enforcement Activities
Improved Trash Bin/Container Management Activities
Quantification Formulas
Full-Capture Treatment Devices

This Short-Term Plan is organized into the following sections:

- Introduction;
- Trash Baseline Load Estimate;
- Load Reduction Calculation Process
- Planned Implementation of New or Enhanced Control Measures;
- Implementation Schedule; and
- References

2.0 BASELINE TRASH LOADING ESTIMATE

Note: Based on the results of a third monitoring event for the BASMAA Baseline Trash Generation Rates Project, this section will be updated with default trash generation rates and provided to Permittees. Tables and sections are therefore subject to change.

This section provides the estimated annual trash baseline load from the City of Hercules' Municipal Separate Storm Sewer System (MS4). In compliance with Provision C.10.a.ii of the MRP, the City of Hercules worked collaboratively with other MRP Permittees through BASMAA to develop data and the process necessary to establish baseline trash loading estimate from our MS4. The collaborative project was managed through the BASMAA Trash Committee and included a series of steps described in BASMAA (2012) and listed below. The approach was intended to be cost-effective and consistent, but still provide an adequate level of confidence in trash loads from MS4s, while acknowledging that uncertainty in trash loads still exists. The approach entailed the following steps:

1. Conduct literature review;
2. Develop conceptual model;
3. Develop and implement sampling and analysis plan;
4. Test conceptual model;
5. Develop and apply default trash **generation rates** to Permittee effective loading areas;
6. Adjust default trash generation rates based on baseline levels of control measure implementation by the Permittee to develop trash **baseline loading rates**; and,
7. Calculate Permittee-specific annual trash **baseline load**.

Through the collaborative BASMAA project, default baseline trash generation rates (volume per area) were developed for a finite set of categories, based on factors that significantly affect trash loads (e.g., land use). These trash generation rates were then applied to effective loading areas in applicable jurisdictional areas within the City of Hercules. Trash generation rates were then adjusted based on baseline street sweeping, storm drain inlet maintenance, and stormwater pump station maintenance conducted in each applicable area. The sum of the trash loads (i.e., rate multiplied by area) from each effective loading area represents the City of Hercules' baseline trash load from its MS4. A full description of the methods by which trash baseline loads were developed is included in BASMAA (2012a) and is summarized below.

Default Trash Generation Rates (Regional Approach)

A set of default trash generation rates for wet and dry seasons were developed via the BASMAA regional collaborative project (BASMAA 2012a). Default generation rates were developed based on a comparison between trash characterization monitoring results, land uses, economic profiles, and other factors that were believed to possibly affect trash generation. Three trash characterization monitoring events were scheduled via the *Trash Generation Rates Project*. Due to the compliance timeline in the MRP, only two of three trash characterization monitoring events were used to develop trash generation rates described in BASMAA (2012a) and presented in this section. Following the completion of the third characterization event (Fall/Winter 2011), this section of the Plan will be updated to reflect the most up-to-date trash generation and loading rates available. Trash generation rates based on the results of two of the three characterization events are shown in Table 2-1 for each trash loading category.

Table 2-1: Regional Default Trash Generation Rates.

Land Use Category	Generation Rates (Gallons/acre/year)
High Density Residential	17.04
Low Density Residential	1.25
Rural Residential	0.17
Commercial and Services/ Heavy, Light and Other Industrial	7.08
Retail and Wholesale	29.99
K-12 Schools	13.14
Urban Parks	2.14

Permittee Characteristics

Incorporated in 1900, the City of Hercules covers 4,160 acres in Contra Costa County, and has a jurisdictional area of 2,214 acres. According to the 2010 Census, it has a population of 24,060, with a population density of 1,323.5 people per square mile, and average household size of 2.96. Of the 24,060 who call the City of Hercules home, 22.8% are under the age of 18, 8.6% are between 18 and 24, 27.1% are between 25 and 44, 31.1% are between 45 and 65, and 10.5% are 65 or older.

Top employers in the City of Hercules include Bio-Rad Laboratories, Mechanics Bank, Hercules Middle School, Hercules High School, and City of Hercules. The median household income was \$75,196 in 2000¹.

Jurisdictional and Effective Loading Areas

Default trash baseline generation rates presented in Table 2-1 were applied to effective loading areas with jurisdictional areas within the City of Hercules. The City of Hercules' jurisdictional areas includes all urban land areas within the City of Hercules boundaries that are subject to the requirements in the MRP. Land use areas identified by a combination of the ABAG 2005 land use dataset and Permittee knowledge that were not included within the City's jurisdictional areas include:

- Federal and State of California Facilities and Roads (e.g., Interstates, State Highways, Military Bases, Prisons);
- Roads Owned and Maintained by Contra Costa County;
- Colleges and Universities (Private or Public);
- Non-urban Land Uses (e.g., agriculture, forest, rangeland, open space, wetlands, water);
- Communication or Power Facilities (e.g., PG & E Substations);
- Water and Wastewater Treatment Facilities; and
- Other Transportation Facilities (e.g., airports, railroads, and maritime shipping ports).

Once the City of Hercules' jurisdictional area was delineated, an effective trash loading area was developed by creating a 200-foot buffer around all streets within the City's jurisdictional area. The

¹ From the 2000 Census. The median household income for the City of Hercules from the 2010 Census is not currently available.

purpose of the effective loading area is to eliminate land areas not directly contributing trash to the City’s MS4 (e.g., large backyards and rooftops). Both the jurisdictional and the effective loading areas for the City of Hercules are presented in Table 2-2.

Table 2-2: Jurisdictional areas and effective loading areas in the City of Hercules by land use classes identified by ABAG (2005).

Land Use Category	Jurisdictional Area (Acres)	Effective Loading Area (Acres)	% of Effective Loading Area
High Density Residential	257	250	14
Low Density Residential	1,291	1,250	70
Rural Residential	27	6	1
Commercial and Services/ Heavy, Light and Other Industrial	159	86	6
Retail and Wholesale	46	37	5
K-12 Schools	100	47	3
Urban Parks	198	116	7
TOTAL	2,078	1,793	100%

Permittee-Specific Baseline Trash Loading Rates

Regional default trash generation rates developed through the BASMAA regional collaborative project were applied to effective loading areas within the City of Hercules based on identified land uses. These generation rates were then adjusted based on the calculated effectiveness of baseline street sweeping, storm drain inlet maintenance and pump station maintenance implemented by the City. These adjustments were conducted in GIS due to the site specificity of baseline generation rates and baseline control measure implementation. The following sections describe the baseline level of implementation for these three control measures. A summary of trash baseline generation and loading rates for the City of Hercules are provided in Table 2-3 and areas associated with these rates are illustrated in Figure 2-1.

Baseline Street Sweeping

A "baseline" street sweeping program is defined as the sweeping frequency and parking enforcement implemented by the City of Hercules prior to effective date of the MRP. Baseline street sweeping differs from "enhanced" street sweeping, which includes increased parking enforcement and/or sweeping conducted at a frequency greater than baseline ceiling (i.e., once per week for retail land uses and twice per month for all other land uses). The baseline ceiling was created to not penalize implementers of enhanced street sweeping programs prior to the effective date of the MRP. For those Permittees that sweep less frequent than the baseline ceiling, their current sweeping frequency serves as their baseline.

The City of Hercules' baseline and current street sweeping program includes sweeping most streets in residential areas once per month and most arterials roads twice per month. Parking enforcement signs for street sweeping are not posted in the City, but parking enforcement equivalent occurs on all major

arterials and some residential areas. The estimated trash load reduced via baseline street sweeping is presented in Table 2-3.

Baseline Storm Drain Inlet Maintenance

Within the City, storm drain inlets were cleaned at a baseline level of one time per year prior to the effective date of the MRP. Based on this baseline frequency and the effectiveness rating developed in BASMAA (2012b), the baseline storm drain maintenance program in the City of Hercules has an annual effectiveness rating of 5%. The estimated trash load reduced via baseline storm drain inlet maintenance is presented in Table 2-3.

Baseline Stormwater Pump Station Maintenance

The City of Hercules does not own any stormwater pump stations with trash racks.

Baseline Trash Loading Estimate

The estimated baseline trash load from the City of Hercules was calculated as the sum of the loads from the City’s effective loading area, adjusted for baseline implementation of street sweeping, storm drain inlet maintenance, and pump station maintenance. The preliminary annual trash baseline load for the City of Hercules is presented in Table 2-3. Preliminary baseline trash loading rates are presented in Figure 2-1 to provide a geographical illustration of areas with estimated low, moderate, high and very high trash loading rates.

Table 2-3: Preliminary annual trash baseline load for the City of Hercules.

Category	Annual Load (gallons)
Preliminary Generation Trash Load	8,416
Load Removed via Baseline Street Sweeping	1,932
Load Removed via Baseline Storm Drain Inlet Maintenance	324
Load Removed via Baseline Stormwater Pump Station Maintenance	0
Preliminary Trash Baseline Load	6,159

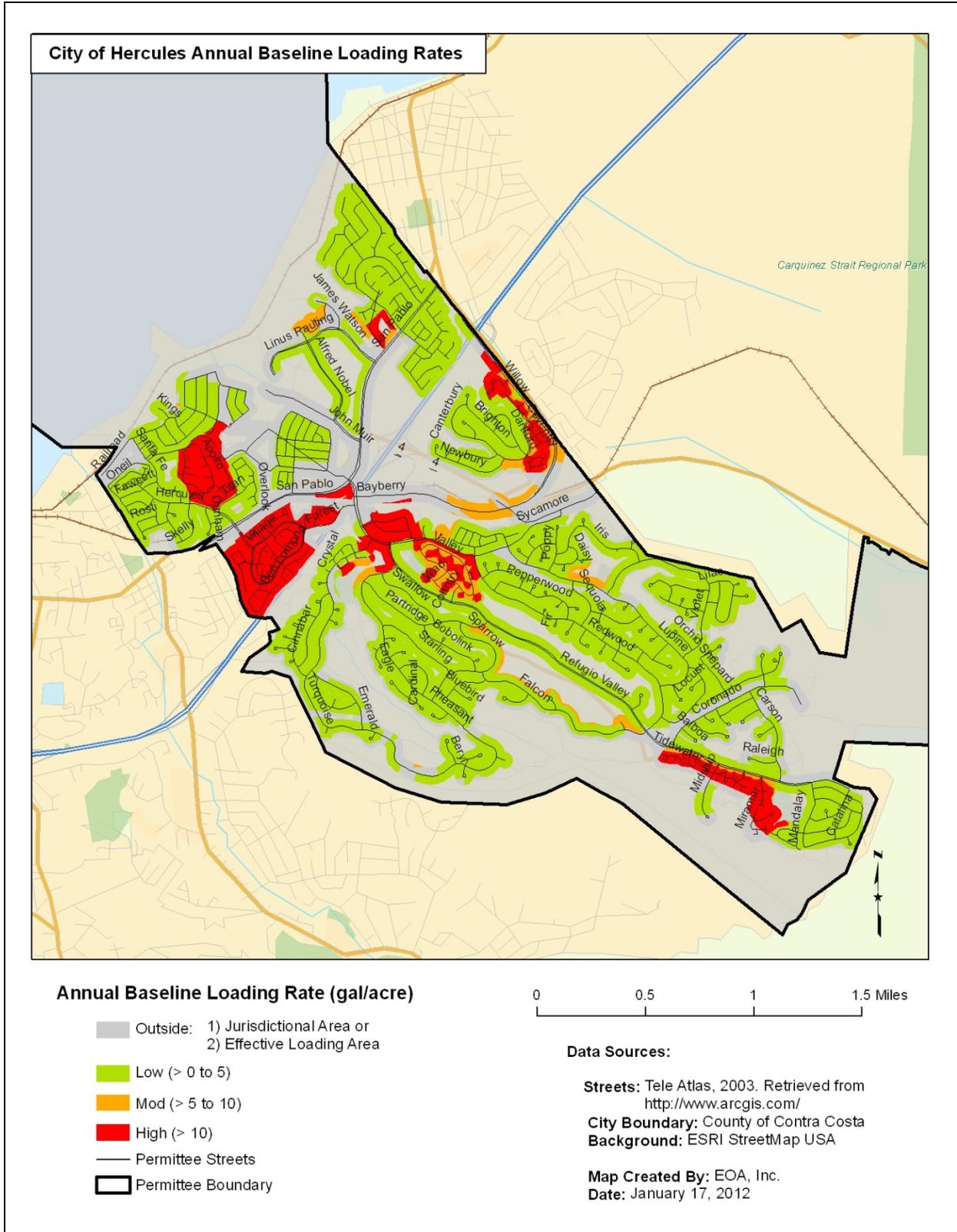


Figure 2-1: Estimated trash baseline loading rates for geographical areas in the City of Hercules.

3.0 LOAD REDUCTION CALCULATION PROCESS

Using the guiding principles and assumptions described BASMAA (2011e), a stepwise process for calculating trash load reductions was developed collaboratively through BASMAA. This process is fully described in Trash Load Reduction Tracking Method Technical Report (BASMAA 2011e) and is briefly summarized in this section. The process takes into account what point in the trash generation and transport process a trash control measure: 1) prevents trash generation, 2) intercepts trash in the environment prior to reaching a water body, or 3) removes trash that has reached a water body. In doing so, it avoids double-counting of trash load reductions associated with specific control measures.

To demonstrate trash load reductions, baseline trash loading rates will be adjusted using the following process:

- Step #1:** Existing Enhanced Street Sweeping
- Step#2:** Trash Generation Reduction
- Step #3:** On-land Interception
- Step #4:** Trash Interception in the Stormwater Conveyance System
- Step #5:** Trash Interception in Waterways
- Step #6:** Comparison to Baseline Trash Load

Reductions calculated in Steps 2 and 5 are assumed to be implemented at a constant rate on an “area-wide” basis. For example, if a new region-wide public education strategy is implemented within the San Francisco Bay area, all Permittees can apply load reduction credits associated with this control measure. In contrast, Steps 1, 3 and 4 are “area-specific” reductions that only apply to specific areas within a Permittee’s jurisdiction. Area-specific control measures include full-capture treatment devices and enhanced street sweeping. Area-specific reductions may require the use of a Geographic Information System (GIS) to calculate.

Reductions are generally applied in the sequence as presented in Figure 2-1 and described below, although some reductions may be applied “in-parallel” and calculated during the same sub-step in the process.

Step #1: Existing Enhanced Street Sweeping

Trash load reductions due to existing enhanced street sweeping implemented prior to the effective date of the MRP and conducted at levels above baseline levels are not incorporated into each Permittee’s trash baseline load. Therefore, load reductions associated with existing enhanced are accounted for first in the trash load reduction calculation process. Existing enhanced street sweeping includes street sweeping conducted at a frequency greater than **1x/week** for streets within retail land use areas or greater than **2x/month** for streets in all other land use areas. The result of adjustments made to trash baseline loads due to the implementation of existing enhanced street sweeping is a set of **current baseline loading rates** and a **current baseline load**.

Step #2: Trash Generation Reduction Control Measures

Trash generation reduction control measures prevent or greatly reduce the likelihood of trash from being deposited onto the urban landscape. They include the following area-wide control measures:

- CR-1: Single-Use Carryout Plastic Bag Ordinances
- CR-2: Polystyrene Foam Food Service Ware Ordinances
- CR-3: Public Education and Outreach Programs
- CR-4: Reduction of Trash from Uncovered Loads
- CR-5: Anti-Littering and Illegal Dumping Enforcement
- CR-6: Improved Trash Bin/Container Management
- CR-7: Single-Use Food and Beverage Ware Ordinances

Load reductions associated with trash generation reduction control measures are applied on an area-wide basis.² Therefore, reductions in current baseline loading rates are adjusted uniformly based on the implementation of the control measure and the associated credit claimed.

Baseline loading rate adjustments for all generation reduction controls measures implemented may be applied in-parallel, but should be applied prior to calculating on-land interception measures discussed in Step #3. The result of adjustments to trash baseline loading rates due to the implementation of these enhanced control measures will be a set of **street loading rates**. The **street load** is the volume of trash estimated to enter the environment and available for transport to the MS4 if not intercepted via on-land control measures described in Step #2.

Step #3: On-land Interception Control Measures

Once trash enters the environment, it may be intercepted and removed through the following control measures prior to reaching the stormwater conveyance system:

- QF-1: On-land Trash Cleanups (Volunteer and/or Municipal) (Area-wide)
- QF-2: Enhanced Street Sweeping (Area-specific)

Since on-land trash cleanups can affect the amount of trash available to street sweepers, load reductions associated with their implementation will be quantified first, followed by street sweeping enhancements. On-land trash cleanups will be applied as an area-wide reduction and all effective loading rates will be adjusted equally. Enhanced street sweeping, however, is an area-specific control measure and only those effective loading rates associated with areas receiving enhancements will be adjusted. Due to the spatial nature of enhanced street sweeping, GIS may be needed to conduct this step.

The result of adjustments to effective loading rates due to the implementation of these enhanced control measures will be a set of **conveyance system loading rates**. The **conveyance load** is the volume of trash estimated to enter the stormwater conveyance system (e.g., storm drains).

² The only exception to this statement are load reductions associated with the establishment of Business Improvement Districts (BIDs) or equivalent, which are specific to geographic areas and considered "area-specific".

Step #4: Control Measures that Intercept Trash in the MS4

Control measures that intercept trash in the stormwater conveyance system are area-specific. Therefore, they only apply to land areas and associated trash loads reduced. Conveyance system loading rates developed as a result of Step #3 should be adjusted in-parallel for the following control measures:

- QF-3a: Partial-capture Treatment Device: Curb Inlet Screens (Area-specific)
- QF-3b: Partial-capture Treatment Device: Stormwater Pump Station Trash Racks Enhancements (Area-specific)
- QF-4: Enhanced Storm Drain Inlet Maintenance (Area-specific)
- QF-5: Full-Capture Treatment Devices (Area-specific)

Load reductions for these control measures are calculated in-parallel because they are applied to independent geographical areas. Reductions from all control measures described in this step are area-specific and may require the use of GIS to calculate a set of **waterway loading rates**. Once waterway loading rates have been determined, a **waterway load** will be developed and used as a starting point for calculating load reductions associated with trash interception in waterways discussed in Step #5.

Step #5: Control Measures that Intercept Trash in Waterways

The load of trash that passes through the stormwater conveyance system without being intercepted may still be removed through interception in waterways. There are two control measures associated with interception in waterways:

- QF-3c: Partial-capture Treatment Device: Litter Booms/Curtains (Area-wide)
- QF-7: Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal) (Area-wide)

As these control measures are implemented, load reduction estimates can be calculated in-parallel for these two measures.

Step #6: Comparison to Baseline Trash Load

Applying the four steps described in the processes above will provide an estimated trash load (volume) remaining after trash control measures are implemented. As depicted in the following equation, the relative percent difference between the baseline load and the load remaining after control measures are implemented is the percent reduction that will be used to assess progress towards MRP trash load reduction goals.

$$\frac{\text{Baseline Load} - \text{Remaining Load}}{\text{Baseline Load}} = \% \text{ Reduction}$$

4.0 ENHANCED TRASH CONTROL MEASURES

This section describes the new or enhanced trash control measures planned for implementation by the City of Hercules. The enhanced control measures described are designed to reach a 40% reduction by July 1, 2014. New and enhanced control measures that will be implemented by City of Hercules include those listed in Table 4.1.

Table 4.1. Trash control measures that will be implemented by City of Hercules to reach the 40% trash load reduction.

Control Measure
Single-use Carryout Plastic Bag Ordinances
Polystyrene Foam Food Service Ware Ordinances
Public Education and Outreach Programs
Activities to Reduce Trash from Uncovered Loads
Anti-Littering and Illegal Dumping Enforcement Activities
Improved Trash Bin/Container Management (Municipally or Privately-Controlled)
Full-Capture Treatment Devices

CR-1: Single-use Carryout Plastic Bag Policy

Single-use plastic carryout bags have been found to contribute substantially to the litter stream and to have adverse effects on marine wildlife (United Nations 2009, CIWMB 2007, County of Los Angeles 2007). The prevalence of litter from plastic bags in the urban environment also compromises the efficiency of systems designed to channel storm water runoff. Furthermore, plastic bag litter leads to increased clean-up costs for the Permittees and other public agencies.

Based on recent experiences of municipalities throughout the State, the process Permittees must go through to enact a single-use carryout plastic bag policy/ordinance is difficult due to intense scrutiny and opposition from not only public interest groups and lobbyists, but also merchants and community members. In most cases, most opposition groups are pressing for the development of Environmental Impact Reports (EIRs) in accordance with the California Environmental Quality Act (CEQA).

Baseline Level of Implementation

Prior to adoption of the MRP, Permittees within the Bay area have enacted policies or ordinances on Single-use Carryout Plastic Bags. To avoid penalizing these early implementers, an applicable control measure implemented by a Permittee prior to the effective date of the MRP will be credited equally to a control measure implemented after the effective date. Therefore, the baseline level of implementation is not applicable for this control measure.

Enhanced Level of Implementation

The City of Hercules plans to adopt an ordinance prohibiting the distribution of all types of single-use carryout bags at all retail establishments with the exception of restaurants. The ordinance is scheduled to take effective prior to July 1, 2013. The total percent trash reduced from MS4s as a result of implementing a single-use carryout plastic bag ordinance will be reported in the Annual Report submitted each September to the Water Board.

Reduction from Implementing Control Measure

The City of Hercules will receive a 12 percent reduction credit for implementing specific enhanced control measures described in Enhanced Level of Implementation section above. The 12 percent reduction credit will be applied to the City of Hercules' baseline trash load. This percent reduction credit is consistent with methods presented in the BASMAA (2011e). A summary of all load reductions anticipated through the implementation of this plan are included in Section 4.0.

CR-2: Polystyrene Foam Food Service Ware Policy

Polystyrene foam is used as food ware in the food service industry. According to the USEPA, floatable debris in waterways, such as products made of polystyrene, is persistent in the environment and has physical properties that can have serious impacts on human health, wildlife, the aquatic environment and the economy (USEPA 2002). Due to its properties, polystyrene foam used as food ware is typically not recycled. Since 1990, over 100 government agencies within the United States, including over twenty within the Bay area have enacted full or partial bans on polystyrene foam food service ware.

Baseline Level of Implementation

Prior to adoption of the MRP, over twenty agencies within the Bay area enacted full or partial bans on polystyrene foam food service ware. To avoid penalizing these early implementers, an applicable control measure implemented by a Permittee prior to the effective date of the MRP will be credited equally to a control measure implemented after the effective date. Therefore, the baseline level of implementation is not applicable for this control measure.

Enhanced Level of Implementation

The City of Hercules adopted an ordinance banning polystyrene foam food service ware at the point-of-sale. The ordinance prohibits food vendors from distributing polystyrene foam and beverage ware at City sponsored events, on City owned property and at all retail food vendors. The ordinance became effective on June 12, 2008. The percent trash reduction from MS4s as a result of implementing a polystyrene foam food service ware ordinance will be reported in the Annual Report submitted each September.

Percent Reduction from Enhancements

The City of Hercules will receive an 8 percent reduction credit for implementing specific enhanced control measures described in *Enhanced Level of Implementation* section above. The 8 percent reduction credit will be applied to City of Hercules' baseline trash load. This percent reduction credit is consistent with methods presented in the BASMAA (2011e). A summary of all load reductions anticipated through the implementation of this plan are included in Section 4.0.

CR-3: Public Education and Outreach Programs

Permittees in the San Francisco Bay Area have implemented public education and outreach programs to inform residents about stormwater issues relating to pollutants of concern, watershed awareness and pollution prevention. Public education and outreach efforts include developing and distributing brochures and other print media; posting messages on websites and social networking media (Facebook, Twitter etc.), attending community outreach events, and conducting media advertising. In recent years, some municipal agencies have implemented anti-litter campaigns to increase public awareness about the impacts of litter on their communities and water quality; and to encourage the public to stop littering.

Baseline Level of Implementation

The City of Hercules implemented the following public education and outreach control measures prior to the effective date of the MRP. The City sponsored Kids for the Bay, distributed informational/educational materials and answered questions in relating to clean water issues. These control measures are considered baseline because they were either not related to trash reduction specifically, or they are not planned to be continued during the term of the MRP. New actions or actions started prior to the effective date of the MRP and continued into the future are described under the next section.

Enhanced Level of Implementation

The City of Hercules will implement the following public education and outreach control measures prior to July 1, 2014.

Advertising Campaigns: The Contra Costa Cleanwater Program conducted a countywide anti-littering campaign on our behalf.

Outreach to school-age Children or Youth: Implement an outreach program to promote anti-littering behavior in school-age children from K through 12 at least 3 events a year.

Media Relations: The City will participate in or contribute to a media relations campaign with the use of free media focusing on litter issues. The media relations campaign will be designed to significantly increase the overall awareness of anti litter messages and associated behavior change in target audiences.

Percent Reduction from Enhancements

The City of Hercules will receive a 6 percent reduction credit for implementing specific enhanced control measures described in *Enhanced Level of Implementation* section above. The 6 percent reduction credit will be applied to the City of Hercules' baseline trash load. This percent reduction credit is consistent with methods presented in the BASMAA (2011e). A summary of all load reductions anticipated through the implementation of this plan are included in Section 4.0.

CR-4: Reduction of Trash from Uncovered Loads

Although it is currently illegal to operate a vehicle that is improperly covered and which its' contents escapes³, vehicles remain an important trash source to MS4s and local waterways. Specifically, vehicles that do not secure or cover their loads when transporting trash and debris have a high risk of contributing trash to MS4s. Land areas that generate trash from vehicles include roads, highways (on/off ramps, shoulders or median strips) and parking lots. To help address the dispersion of trash from unsecured or uncovered vehicles destined for landfills and transfer stations, Permittees may require municipally-contracted trash haulers to cover or secure loads or work with municipal or private landfill and transfer station operators to educate waste haulers on securing loads and/or to enhance enforcement of existing regulations.

Baseline Level of Implementation

The baseline trash load described in Section 2.0, assumes that prior to adoption of the MRP the City of Hercules has not adopted control measures to reduce trash from vehicles with uncovered loads. Therefore, implementation of any of the control measures described in this section is considered to be enhanced implementation.

Enhanced Level of Implementation

The City of Hercules will implement the following enhanced control measures to reduce trash from vehicles with uncovered loads prior to July 1, 2014.

Require Municipal Trash Haulers to Cover Loads: Develop and include language in the City's hauling service contracts that require contracted trash and construction debris haulers to cover loads when transporting trash and debris to landfills and transfers stations.

Enhanced Enforcement Program for Vehicles with Uncovered Loads: Establish an Enforcement Program that will prohibit the transportation of trash or debris without a cover. The Enforcement Program will include citations and fines.

Reduction from Enhancements

The City of Hercules will receive a 5 percent reduction credit for implementing specific enhanced control measures described in *Description of Enhanced Level of Implementation* section above. The 5 percent reduction credit will be applied to the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the City of Hercules. This percent reduction credit was obtained from the *Trash Load Reduction Tracking Method Report* (BASMAA 2011e) and is presented in the Trash Load Reduction Summary Table included in Section 4.

³ In accordance with the California Vehicle Code Sections 23114 and 23115, it is against the law to operate a vehicle on the highway which is improperly covered, constructed, or loaded so that any part of its contents or loads spills, drops, leaks, blows, or otherwise escapes from the vehicle. Exempted materials include hay and straw, clear water and feathers from live birds. Additionally, any vehicle transporting garbage, trash, or rubbish, used cans or bottles, waste papers, waste cardboard, etc. must have the load covered to prevent any part of the load from spilling on the highway (CVC 2011). Significant fines are possible for non-compliance.

CR-5: Anti-Littering and Illegal Dumping Enforcement Activities

Successful anti-littering and illegal dumping enforcement activities include laws or ordinances that make littering or dumping of trash illegal. Laws are enforced by various municipal agency staff (e.g., police, sheriff and public works department staff) who issue citations in response to citizen complaints or other enforcement methods (e.g., surveillance cameras, signage and/or physical barriers installed at illegal dumping hot spots). In some California jurisdictions, the minimum fine for littering is \$500 and the maximum penalty for highway littering is \$1000 (City of San Francisco 2001). However, it is difficult to enforce small littering events unless they are witnessed or solid proof exists linking the offender to the litter. As a result, enforcement tends to focus on larger scale illegal dumping activities.

Baseline Level of Implementation

The baseline trash load described in Section 2.0, assumes that the City of Hercules has adopted a basic anti-littering and illegal dumping enforcement program that entails receiving and responding to complaints from citizens as resources allow.

Enhanced Level of Implementation

The City of Hercules will implement the following enhanced anti-littering and illegal dumping enforcement control measures prior to July 1, 2014.

Anti-Littering and Illegal Dumping Enforcement Program: Implement a program that will investigate, collect evidence from illegal dump sites in an attempt to identify offenders. The implementation will also include citations as warranted.

Percent Reduction from Enhancements

The City of Hercules will receive a 2 percent reduction credit for implementing specific enhanced control measures described in *Description of Enhanced Level of Implementation* section above. The 2 percent reduction credit will be applied to the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the City of Hercules. This percent reduction credit was obtained from the *Trash Load Reduction Tracking Method Report* (BASMAA 2011e) and is presented in the Trash Load Reduction Summary Table included in Section 4.

CR-6: Improved Trash Bin/Container Management

Receptacles used to place/store trash or recyclables prior to collection by a public agency or private waste hauler reduce the potential for littering and trash loading to stormwater conveyance systems and receiving waters (City of Los Angeles 2004). For the purposes of assigning trash load reduction credits, receptacles fall into the following two categories:

- **Private Trash/Recycling Bins:** A receptacle for placing trash or recyclables generated from a household, business, or other location that is serviced by a trash hauler. Bins are specifically-designed, heavy-duty plastic wheeled containers with hinged lids; or large multi-yard metal or plastic containers rectangular in shape.
- **Public Area Trash Containers:** A receptacle for placing incidental trash generated in public spaces that provides people with a convenient and appropriate place to dispose of trash. The design and size of public area trash containers vary widely, depending on their setting and use.

The effectiveness of bins/containers and bins in reducing trash in the environment is likely dependent upon: the location and density of the receptacles, size of the bin/container in relationship to the size needed to service users, frequency of maintenance, and the ability of the bin/container to capture and contain the trash deposited.

Baseline Level of Implementation

The baseline trash load described in Section 2.0, assumes that the City of Hercules has not implemented enhanced trash bin/container management practices prior to effective date of the MRP. The City of Hercules currently has an ordinance that requires appropriate trash service for private properties.

Enhanced Level of Implementation

The City of Hercules will implement the following improved trash bin/container management practices prior to July 1, 2014.

Adequate Trash Service Program: Implement a program that identifies businesses or households that have inadequate trash service; and through City's code enforcement program requiring businesses and households to sufficiently remedy the issue.

Strategic Plan for Public Area Trash Containers: The strategic plan will identify whether public area trash containers are sufficiently located in high trash generating areas and are adequately designed to manage trash types that typically are generated from activities occurring at these areas are in locations where people dispose of these items such as near schools or parks. The plan will also identify an increased level of inspection and maintenance of public area trash containers is needed at high trash generating sites.

Percent Reduction from Enhancements

The City of Hercules will receive a 6 percent reduction credit for implementing specific enhanced control measures described in *Description of Enhanced Level of Implementation* section above. The 6 percent reduction credit will be applied to the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the City of Hercules. This percent reduction credit was obtained from the *Trash Load Reduction Tracking Method Report* (BASMAA 2011e) and is presented in the Trash Load Reduction Summary Table included in Section 4.

QF-5: Full-Capture Treatment Devices

As defined by the Municipal Regional Stormwater Permit (MRP), a full-capture system or device is any single device or series of devices that traps all particles retained by a 5 mm mesh screen and has a design treatment capacity of not less than the peak flow rate (Q) resulting from a one-year, one-hour, storm in the sub-drainage area. A list of the full-capture systems and devices recognized by the San Francisco Bay Regional Water Quality Control Board (Water Board) is included in *Trash Load Reduction Tracking Method Report* (BASMAA 2011e). Trash loads reduced via publically or privately owned and operated devices within a Permittee's jurisdictional area that have been recognized by the Water Board as full-capture may be used to demonstrate attainment of trash load reduction goals.

Baseline Level of Implementation

Prior to adoption of the MRP, some Permittees installed and maintained full capture devices. To avoid penalizing these early implementers, an applicable control measure implemented within a Permittee's jurisdictional area prior to the effective date of the MRP will be credited equally to a control measure implemented after the effective date. Therefore, the baseline level of implementation is no trash full-capture devices have been installed.

Enhanced Level of Implementation

A total of 9 trash full-capture treatment devices have been installed in the City of Hercules prior to July 1, 2014. A list of these full-capture devices is included in Table QF-6-1. All devices listed within this table are enhanced trash control measures. Table QF-6-1 also includes the area treated and the calculated trash load reduced from each full-capture treatment device. These calculations are consistent with the approach described in the *Trash Load Reduction Tracking Method Report* (BASMAA 2011e).

Percent Reduction from Enhancements

The total estimated annual volume of trash that will be reduced by July 1, 2014 as a result of implementing full capture devices is 15.2 cubic feet. This volume is equal to approximately a 1.6 percent reduction in the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the City of Hercules Both values provided within this section are included in Trash Load Reduction Summary Table included in Section 4.

Table QF-6-1. Trash full-capture treatment devices within the jurisdictional boundaries of the City of Hercules that are planned for installation by July 1, 2014.

Device ID	Public or Private	Device Name	Location (Cross Streets)	Installation Date/Anticipated Installation Date	Total Area Treated (acres)	Trash Load Reduced
	PUBLIC	CDS - Storm Pollutant Separation Chamber	End of Trestle Cove (Victoria by the Bay)	2002	104	41 gal/year
	PUBLIC	CDS - Storm Pollutant Separation Chamber	Victoria Park/Tug Boat Lane (Victoria by the Bay)	2002	104	41 gal/year
	PUBLIC	Stormsceptor 900	Maple Drive/Black Walnut Place (Sycamore Villas)	2001	21.7	5 gal/year
	PUBLIC	CDS – Model PMSU20_15	Cottage Lane/alley	2003	5.5	1 gal/year
	PUBLIC	CDS – Model PMSU20_20	Willet Street/ Sycamore (Baywood)	2004	4.25	1 gal/year
	PUBLIC	CDS – Model PMSU20_20	Willet Street/ Sycamore (Baywood)	2004	4.25	1 gal/year
	PUBLIC	Vortech Model 2000	North Front Street/Central Street (Bayside)	2005	12.5	3 gal/year
	PUBLIC	Vortech Model 2000	North Front Street/Drake Lane (Bayside)	2005	12.5	3 gal/year
	PUBLIC	Vortech Model 1000	South Front Street/De Anza Lane (Bayside)	2005	10	2 gal/year

5.0 SUMMARY OF TRASH CONTROL MEASURE ENHANCEMENTS

The City of Hercules is committed to reducing the potential for trash impacts in local water bodies in the San Francisco Bay Area. The planned enhanced trash control measures described in Section 3.0 are also listed in Table 4-1. The enhancements are intended to comply with the 40% trash load reduction goal in MRP provision C.10.

Table 5-1. Planned enhanced trash control measure implementation within the jurisdictional boundaries of the City of Hercules and associated trash loads reduced.

Trash Control Measure	Summary Description of Control Measure	% Reduction (Credits)	Trash Load Reduced	Cumulative % Reduction (Compared to Baseline)
Single-use Carryout Plastic Bag Ordinance (CR-1)	Adopt an ordinance prohibiting the use of single-use bags.	12%	739	12%
Polystyrene Foam Food Service Ware Ban (CR-2)	Adopted an ordinance prohibiting the distribution of Polystyrene	8%	493	20%
Public Education and Outreach Programs (CR-3)	Advertising campaign, outreach to school-age children, media relations	6%	370	26%
Activities to Reduce Trash from Uncovered Loads (CR-4)	Implementation of Vehicles with Uncovered Loads Enforcement Program	5%	308	31%
Anti-Littering and Illegal Dumping Enforcement Activities (CR-5)	Implementation of Illegal Dumping Enforcement Program	2%	123	33%
Improved Trash Bin/Container Management (Municipally or Privately-Controlled) (CR-6)	Adequate Trash Service Program & Strategic Plan for Public Area Trash Containers.	6%	370	39%
Single-Use Food and Beverage Ware Ordinance (CR-7)		n/a	n/a	39%
Enhanced On-land Trash Cleanups (Volunteer and/or Municipal) (QF-1)		NA	0	39%
Enhanced Street Sweeping (QF-2) – (Existing and Future Enhanced)		NA	0	39%
Curb Inlet Screens (Partial-capture Treatment Device) (QF-3a)		NA	0	39%
Enhanced Storm Drain Inlet Maintenance (QF-4)		NA	0	39%
Full-capture Treatment Devices (QF-5)	Installed 9 Large Full-Capture Devices	NA	102	40.7%
Enhanced Pump Station Trash Rack Cleaning (Partial-capture Treatment Device) (QF-3b)		NA	0	40.7%
Litter Booms (Partial-capture Treatment Device) (QF-3c)		NA	0	40.7%
Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal) (QF-6)		NA	0	40.7%

5.1 Annual Reporting and Progress Towards Trash Load Reduction Goal(s)

Consistent with MRP Provision C.10.d (i), the City of Hercules intends to report on progress towards MRP trash load reduction goals on an annual basis beginning with the Fiscal Year 2011-2012 Annual Report. Annual reports will include:

1. A brief summary of all enhanced trash load reduction control measures implemented to-date;
2. The dominant types of trash likely removed via these control measures;
3. Total trash loads removed (credits and quantifications) via each control measure implementation; and
4. A summary and quantification of progress towards trash load reduction goals.

Similar to other MRP provision, annual reporting formats will be consistent region-wide. Annual reports are intended to provide a summary of control measure implementation and demonstrate progress toward MRP trash reduction goals. For more detailed information on specific control measures, the City of Hercules will retain supporting documentation on trash load reduction control measure implementation. These records should have a level of specificity consistent with the trash load reduction tracking methods described in the *BASMAA Trash Load Reduction Tracking Method Technical Report* (BASMAA 2011e).

5.2 Considerations of Uncertainties

Baseline trash loading and load reduction estimates are based on the best available information at the time this Short-Term Plan was developed. As with any stormwater loading and reduction estimate, a number of assumptions were used during calculations and therefore uncertainty is inherent in the baseline trash load estimate presented in Section 2.0 and the load reduction estimate presented in this section. For these reasons, the baseline loading estimates presented in this plan should be considered first-order estimates. During the implementation of this Short-Term Plan and subsequent plans, additional information may become available to allow the calculation of a more robust baseline load.

6.0 IMPLEMENTATION SCHEDULE

Implementation of enhanced trash control measures by the City of Hercules is currently planned to occur in a timeframe consistent with MRP requirements. A preliminary implementation schedule for all planned enhancements is described in Table 5-1. This schedule provides a timeframe for reducing trash discharged from the City of Hercules' MS4 by 40%.

Based on new information that becomes available during the implementation of this Short-Term Plan (e.g., revisions to baseline loading estimates or load reduction credits of quantification formulas), the City of Hercules may choose to amend or revise this Plan and/or the associated implementation schedule. If revisions or amendments occur, a revised Short-Term Plan and implementation schedule will be submitted to the Water Board via the City of Hercules' annual reporting process.

Table 6-1. Preliminary implementation schedule for enhanced trash control measures in the City of Hercules

Trash Control Measure	Beginning Date of Implementation
Single-use Carryout Plastic Bag Ordinance (CR-1)	July 2013
Polystyrene Foam Food Service Ware Ban (CR-2)	February 2012
Public Education and Outreach Programs (CR-3)	February 2012
Activities to Reduce Trash from Uncovered Loads (CR-4)	July 2013
Anti-Littering and Illegal Dumping Enforcement Activities (CR-5)	July 2013
Improved Trash Bin/Container Management (Municipally or Privately-Controlled) (CR-6)	July 2013
Full-capture Treatment Devices (QF-5)	February 2012

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