

The Town of
Woodside

August 27, 2010

Mr. Bruce Wolfe
Executive Officer
San Francisco Bay Regional Water Quality Control Board
1410 Clay Street, Suite 1400
Oakland, CA 94612

RE: Town of Woodside Yearly Deliverables (June 30, 2009- July 1, 2010)
San Mateo Countywide Stormwater Pollution Prevention Program
Authorized Signature for Report Submittals

Dear Mr. Wolfe:

The attached represents the Town of Woodside's Yearly Deliverables (June 30, 2009- July 1, 2010) for the San Mateo Countywide Stormwater Pollution Prevention Program.

The Yearly Deliverables and all attachments have been prepared under my direction in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system or who are directly responsible for gathering the information, the information is to the best of my knowledge true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine for knowing violations.

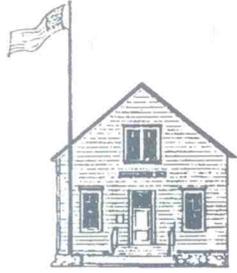
P.O. Box 620005
2955 Woodside Road
Woodside, CA 94062

Sincerely,

A handwritten signature in black ink, appearing to read 'Gratien Etchebehere', written in a cursive style.

Gratien Etchebehere
Community Preservation Officer

650-851-6790
Fax: 650-851-2195
townhall@woodsidetown.org



The Town of
Woodside

Date: August 27, 2010

Mr. Bruce Wolfe
Executive Officer
San Francisco Bay Regional Water Quality Control Board
1410 Clay Street Suite 1400
Oakland, CA 94612

Subject: Notification of Duly Authorized Representative for the Town of Woodside

Dear Mr. Wolfe:

This is to document the person that I am authorizing to represent the Town for signing and certifying municipal regional stormwater NPDES-permit required reports for submittal to the San Francisco Bay Regional Water Quality Control Board (Regional Water Board) and signing and certifying responses to other information requests from the Regional Water Board.

The following person, Gratien Etchebehere is duly authorized by me to sign and certify stormwater required reports for submittal to the Regional Water Board or authorize the City/County Association of Governments (C/CAG) of San Mateo County to sign and certify countywide/regional reports and studies prepared on behalf of the Town.

Gratien Etchebehere
Community Preservation Officer

P.O. Box 620005
2955 Woodside Road
Woodside, CA 94062

As describe above, the person listed above is also authorized to direct C/CAG's Executive Director or San Mateo Countywide Water Pollution Prevention Program's Stormwater Coordinator to sign and certify reports prepared by the San Mateo Countywide Water Pollution Prevention Program (Countywide Program) or Bay Area Stormwater Management Agencies Association (BASMAA) on behalf of the Town. This authorization for the submittal of countywide and BASMAA reports will typically occur by an affirmative vote of my duly authorized representative at the Countywide Program's Stormwater Technical Advisory Committee meetings, but the authorization may also be obtained through email, telephone, face to face contact, or other method of communication.

This notification will remain in effect until it is changed by me or my successor.

Very truly yours,

A handwritten signature in blue ink that reads "Susan George". The signature is written in a cursive, flowing style.

Susan George
Town Manager

650-851-6790
Fax: 650-851-2195
townhall@woodsidetown.org

FY 2009-2010 Annual Report
Permittee Name: Town of Woodside

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Section 1 – Permittee Information

Background Information					
Permittee Name:	Town of Woodside				
Population:	5,352				
NPDES Permit No.:	CAS612008				
Order Number:	R2-2009-0074				
Reporting Time Period (month/year):	July / 2009 through June / 2010				
Name of the Responsible Authority:	Graien Etchebehere	Title:	Community Preservation Officer		
Mailing Address:	P.O. Box 620005				
City:	Woodside	Zip Code:	94062	County:	San Mateo
Telephone Number:	(650) 851-6790	Fax Number:	(650) 851-2195		
E-mail Address:	basquecheese@hotmail.com				
Name of the Designated Stormwater Management Program Contact (if different from above):	same	Title:			
Department:					
Mailing Address:					
City:		Zip Code:		County:	
Telephone Number:		Fax Number:			
E-mail Address:					

Section 2 - Provision C.2 Reporting Municipal Operations

Program Highlights and Evaluation
 Highlight/summarize activities for reporting year.

Summary: The Town of Woodside has implemented the appropriate BMP's required with the new stormwater permit with the help of the countywide program, in which the Town has been actively involved.

C.2.a ► Street and Road Repair and Maintenance

Place an X in the boxes next to implemented BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type NA in the box. If one or more of these BMPs were not adequately implemented during the reporting fiscal year then indicate so and provide explanation in the comments section below:

X	Control of debris and waste materials during road and parking lot installation, repaving or repair maintenance activities from polluting stormwater
X	Control of concrete slurry and wastewater, asphalt, pavement cutting, and other street and road maintenance materials and wastewater from discharging to storm drains from work sites.
X	Sweeping and/or vacuuming and other dry methods to remove debris, concrete, or sediment residues from work sites upon completion of work.

Comments:

C.2.b ► Sidewalk/Plaza Maintenance and Pavement Washing

Place an X in the boxes next to implemented BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type NA in the box. If one or more of these BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:

X	Control of wash water from pavement washing, mobile cleaning, pressure wash operations at parking lots, garages, trash areas, gas station fueling areas, and sidewalk and plaza cleaning activities from polluting stormwater
X	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs

Comments:
 The Town of Woodside does not wash pavement or have any plazas to wash.

C.2.c ▶ Bridge and Structure Maintenance and Graffiti Removal

Place an X in the boxes next to implemented BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type NA in the box. If one or more of these BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:

X	Control of discharges from bridge and structural maintenance activities directly over water or into storm drains
NA	Control of discharges from graffiti removal activities
NA	Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities
X	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs for graffiti removal

Comments:

The Town of Woodside has not had and does not currently have any issues with graffiti. If there was an incident with graffiti involved, the Town would use the proper BMP's to remove it.

C.2.d ▶ Stormwater Pump Stations

Does your municipality own stormwater pump stations: Yes No

If your answer is No then skip to C.2.e.

(For FY 10-11 Annual Report only) Complete the following table for dry weather DO monitoring and inspection data for pump stations¹ (add more rows for additional pump stations):

Pump Station Name and Location	First inspection Dry Weather DO Data		Second inspection Dry Weather DO Data	
	Date	mg/L	Date	mg/L

(For FY 10-11 Annual Report only) Summarize corrective actions as needed for DO monitoring at or below 3 mg/L. Attach inspection records of additional DO monitoring for corrective actions:

Summary:

Attachments:

¹ Pump stations that pump stormwater into stormwater collection systems or infiltrate into a dry creek immediately downstream are exempt from DO monitoring.

(For FY 10-11 Annual Report only) Complete the following table for wet weather inspection data for pump stations (add more rows for additional pump stations):

Pump Station Name and Location	Date (2x/year required)	Presence of Trash (Cubic Yards)	Presence of Odor (Yes or No)	Presence of Color (Yes or No)	Presence of Turbidity (Yes or No)	Presence of Floating Hydrocarbons (Yes or No)

C.2.e. ► Rural Public Works Construction and Maintenance

Does your municipality own/maintain rural² roads: Yes No

If your answer is **No** then skip to **C.2.f.**

Place an **X** in the boxes next to implemented BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type **NA** in the box. If one or more of the BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:

X	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas
X	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources
X	No impact to creek functions including migratory fish passage during construction of roads and culverts
X	Inspection of rural roads for structural integrity and prevention of impact on water quality
X	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts and excessive erosion
X	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate
X	Inclusion of measures to reduce erosion, provide fish passage, and maintain natural stream geomorphology when replacing culverts or design of new culverts or bridge crossings

Comments including listing increased maintenance in priority areas:

The Town of Woodside strives to preserve all riparian areas and minimize any negative impacts caused by runoff from roadways.

² Rural means any watershed or portion thereof that is developed with large lot home-sites, such as one acre or larger, or with primarily agricultural, grazing or open space uses.

C.2.f. ► Corporation Yard BMP Implementation			
Place an X in the boxes below that apply to your corporation yard(s):			
<input checked="" type="checkbox"/>	We do not have a corporation yard		
<input type="checkbox"/>	Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit		
<input type="checkbox"/>	We certify that we have a current Stormwater Pollution Prevention Plan (SWPPP) for the Corporation Yard(s)		
Place an X in the boxes below next to implemented SWPPP BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type NA in the box. If one or more of the BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:			
<input checked="" type="checkbox"/>	Control of pollutant discharges to storm drains such as wash waters from cleaning vehicles and equipment		
<input checked="" type="checkbox"/>	Routine inspection prior to the rainy seasons of corporation yard(s) to ensure non-stormwater discharges have not entered the storm drain system		
<input type="checkbox"/>	Containment of all vehicle and equipment wash areas through plumbing to sanitary or another collection method		
<input checked="" type="checkbox"/>	Use of dry cleanup methods when cleaning debris and spills from corporation yard(s) or collection of all wash water and disposing of wash water to sanitary or other location where it does not impact surface or groundwater when wet cleanup methods are used		
<input checked="" type="checkbox"/>	Cover and/or berm outdoor storage areas containing waste pollutants		
Comments: The Town of Woodside has a very small corporation yard and contracts out all of its vehicle maintenance work, including equipment washing.			
If you have a corporation yard(s) that is not an NOI facility, complete the following table for inspection results for your corporation yard(s) or attach a summary including the following information:			
Corporation Yard Name	Inspection Date (1x/year required)	Inspection Findings/Results	Follow-up Actions
Town Hall Yard	4/23/2010	Some asphalt left uncovered.	Made sure they covered the asphalt and observed it was covered.

Section 3 - Provision C.3 Reporting New Development and Redevelopment

C.3.a. ► New Development and Redevelopment Performance Standard Implementation Summary Report

(For FY 10-11 Annual Report only) Provide a brief summary of the methods of implementation of Provisions C.3.a.i.(1)-(8).

Summary:

The Town of Woodside has no projects which require to be listed under Section C.3 of this permit.

C.3.b. ► Green Streets Status Report

(All projects to be completed by December, 2014)

On an annual basis (if applicable), report on the status of any pilot green street projects within your jurisdiction. For each completed project, report the capital costs, operation and maintenance costs, legal and procedural arrangements in place to address operation and maintenance and its associated costs, and the sustainable landscape measures incorporated in the project including, if relevant, the score from the Bay-Friendly Landscape Scorecard.

Summary:

NA

C.3.b.v.(1) ► Regulated Projects Reporting Table

Fill in attached table C.3.b.v.(1) or attach your own table including the same information

C.3.h.iv. ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

(1) Fill in attached table C.3.h.iv.(1) or attach your own table including the same information

(2) On an annual basis, provide a discussion of the inspection findings for the year and any common problems encountered with various types of treatment systems and/or HM controls. This discussion should include a general comparison to the inspection findings from the previous year.

Summary:

(3) On an annual basis, provide a discussion of the effectiveness of the O&M Program and any proposed changes to improve the O&M Program (e.g., changes in prioritization plan or frequency of O&M inspections, other changes to improve effectiveness program).
Summary:

Section 4 – Provision C.4 Industrial and Commercial Site Controls

C.4.a.ii: Legal Authority

(For FY 09-10 Annual Report only) Do you have adequate legal authority to obtain effective stormwater pollutant control on industrial sites? Yes No

If No, explain:

C.4.c.ii.(5): Enforcement Response Plan

(For FY 09-10 Annual Report only) Have you developed and implemented an Enforcement Response Plan by April 1, 2010? Yes No

If No, explain:

Program Highlights

Provide background information, highlights, trends, etc. For FY 09-10 Annual Report describe steps taken to revise your program to meet new data tracking and reporting requirements.

The Town of Woodside has a very small commercial center and no industrial businesses. The Town has a contract with San Mateo County Environmental Health to conduct all stormwater inspections for commercial businesses.

C.4.b.i: Business Inspection Plan

(For FY 09-10 Annual Report only) Do you have a Business Inspection Plan? Yes No

If No, explain:
 See above.

C.4.b.iii.(1) ► Potential Facilities List

List below or attach your list of industrial and commercial facilities in your Inspection Plan to inspect that could reasonably be considered to cause or contribute to pollution of stormwater runoff.

See attached.

C.4.b.iii.(2) ► Facilities Scheduled for Inspection

List below or attach your list of facilities scheduled for inspection during the current fiscal year.

See Attached.

C.4.c.iii.(1) ► Facility Inspections

Fill out the following table or attach a summary of the following information.

	Number	Percent
Number of businesses inspected (if known)	10	
Total number of inspections conducted	10	
Violations issued (excluding verbal warnings)	0	
Sites inspected in violation	0	0
Violations ¹ resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	0	0

¹ Total number of violations equals the number of initial enforcement actions (i.e. one violation issued for several problems during an inspection at a site). It does not equal the total number of enforcement actions because one violation issued at a site may have a second enforcement action for the same violation at the next inspection if it is not corrected.

C.4.c.iii.(2) ► Frequency and Types/Categories of Violations Observed

Fill out the following table or attach a summary of the following information.

Type/Category of Violations Observed	Number of Violations
Actual discharge (e.g. non-stormwater discharge)	0

Potential discharge (e.g. BMPs not in place or ineffective)	0
---	---

C.4.c.iii.(2) ▶ Frequency and Type of Enforcement Conducted

Fill out the following table or attach a summary of the following information.

	Enforcement Action (as listed in ERP) ¹	Number of Enforcement Actions Taken	% of Enforcement Actions Taken ²
Level 1	Verbal Warning	0	0
Level 2	Notice of Violation	0	0
Level 3	Notice to Comply	0	0
Level 4	Legal Action	0	0
Total		0	0

Notes:

¹Agencies to list specific enforcement actions as defined in their ERPs.

²Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

C.4.c.iii.(3) ▶ Types of Violations Noted by Business Category

Fill out the following table or attach a summary of the following information.

Business Category ¹	Actual Discharge Violations	Potential Discharge Violations
No violations observed or potential violations observed.		

Notes:

¹ List your Program's standard business categories.

C.4.c.iii.(4) ▶ Non-Filers

List below or attach a list of the facilities required to have coverage under the Industrial General Permit but have not filed for coverage:

0

C.4.d.iii ▶ Staff Training Summary

****See San Mateo County Staff Training****

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
See San Mateo County Staff Training				

Section 5 – Provision C.5 Illicit Discharge Detection and Elimination

C.5.a.ii ▶ Legal Authority

(For FY 09-10 Annual Report only) Do you have adequate legal authority to prohibit and control illicit discharges and escalate stricter enforcement to achieve expedient compliance? Yes No

If No, explain:

C.5.b.ii.(4) ▶ Enforcement Response Plan

(For FY 09-10 Annual Report only) Have you developed and implemented an Enforcement Response Plan by April 1, 2010? Yes No

If No, explain:

Program Highlights

Provide background information, highlights, trends, etc. For FY 09-10 Annual Report describe steps taken to revise your program to meet new data tracking and reporting requirements.

The Town of Woodside invested in a new program called TRAKIT. TRAKIT has a code enforcement module, which ensures that no violations fall through the cracks and is easily documented.

C.5.c.iii ▶ Complaint and Spill Response Phone Number and Spill Contact List

List below or attach your complaint and spill response phone number and spill contact list.

Contact	Description	Phone Number
Gratien Etchebehere	Community Preservation Officer	650 851 6790
Eunejune Kim	Deputy Town Engineer	650 851 6790

C.5.d.iii ▶ Evaluation of Mobile Business Program

Describe implementation of minimum standards and BMPs for mobile businesses and your enforcement strategy. This may include participation in the BASMAA Mobile Surface Cleaners regional program or local activities.

Description: The Town of Woodside does not have mobile businesses.

C.5.e.iii ▶ Evaluation of Collection System Screening Program

Provide a summary or attach a summary of your collection screening program, a summary of problems found during collection system screening and any changes to the screening program this FY.

Description: Does not apply.

C.5.f.iii.(1), (2), (3) ▶ Spill and Discharge Complaint Tracking

Spill and Discharge Complaint Tracking (fill out the following table or include an attachment of the following information)

	Number	Percentage
Discharges reported (C.5.f.iii.(1))	0	
Discharges reaching storm drains and/or receiving waters (C.5.f.iii.(2))	0	
Discharges resolved in a timely manner (C.5.f.iii.(3))	0	

C.5.f.iii.(4) ▶ Summary of major types of discharges and complaints

Provide a narrative or attach a table and/or graph.

The Town responded to seven reported violations, all concerning equestrian facilities. The Town obtained 100% compliance with verbal warnings and deadlines given to the owners. In most of the cases, the owners were unaware of the proper BMP's for horse facilities.

Section 6 – Provision C.6 Construction Site Controls

C.6.a.iii.▶ Legal Authority			
(For FY 09-10 Annual Report only) Is your agency's legal authority adequate for C.6 compliance?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
If No, explain:			

C.6.b.ii.(3) ▶ Enforcement Response Plan			
(For FY 09-10 Annual Report only) Was your Enforcement Response Plan developed and implemented by April 1, 2010?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
If No, explain:			

C.6.e.iii.1.a b c ▶ Site/Inspection Totals		
Number of sites disturbing < 1 acre of soil requiring storm water runoff quality inspection (i.e. High Priority) (C.6.e.iii.1.a)	Number of sites disturbing ≥ 1 acre of soil (C.6.e.iii.1.b)	Total number of storm water runoff quality inspections conducted (C.6.e.iii.1.c)
#76	#0	#76

C.6.e.iii.1.d ▶ Construction Activities Storm Water Violations		
BMP Category	Number of Violations ¹	% of Total Violations ²
Erosion Control	8	30
Run-on and Run-off Control	1	3
Sediment Control	3	11
Active Treatment Systems	13	48
Good Site Management	2	7
Non Stormwater Management	0	0
Total	27	100%

Notes:

¹Count one violation in a category for each site and inspection regardless of how many violations/problems occurred in the BMP category.

²Percentage calculated as number of violations in each category divided by total number of violations in all six categories.

C.6.e.iii.1.e ▶ Construction related storm water enforcement actions			
	Enforcement Action (as listed in ERP) ¹	Number Enforcement Actions Taken	% Enforcement Actions Taken ²
Level 1	Verbal Warning	27	100
Level 2	Notice of Violation	0	0
Level 3	Notice to Comply	0	0
Level 4	Legal Action	0	0
Total		27	100%

Notes:

¹Agencies should list the specific enforcement actions as defined in their ERPs.

²Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

C.6.e.iii.1.f, g ▶ Illicit Discharges	
	Number
Number of illicit discharges, actual and those inferred through evidence (C.6.e.iii.1.f)	0
Number of sites with discharges, actual and those inferred through evidence (C.6.e.iii.1.g)	0

C.6.e.iii.1.h.1 ▶ Violation Correction Times

	Number	Percent
Violations fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii.1.h)	27	100% ²
Violations not fully corrected within 30 days after violations are discovered (C.6.e.iii.1.i)	0	0% ³
Total number of violations for the reporting year ¹	27	100%

Notes:

¹Total number of violations equals the number of initial enforcement actions (i.e. one violation issued for several problems during an inspection at a site). It does not equal the total number of enforcement actions because one violation issued at a site may have a second enforcement action for the same violation at the next inspection if it is not corrected.

²Calculated as number of violations fully corrected in a timely period after the violations are discovered divided by the total number of violations for the reporting year.

³Calculated as number of violations not fully corrected within 30 days after the violations are discovered divided by the total number of violations for the reporting year.

C.6.e.iii.(2) ▶ Evaluation of Inspection Data

Describe your evaluation of the tracking data and data summaries and provide information on the evaluation results (e.g., data trends, typical BMP performance issues, comparisons to previous years, etc.).

Description: All of the issues were minor and were easily corrected by the contractors.

C.6.e.iii.(2) ▶ Evaluation of Inspection Program Effectiveness

Describe what appear to be your program's strengths and weaknesses, and identify needed improvements, including education and outreach.

Description: The Town of Woodside's inspection program is very stringent and every site receives multiple inspections throughout the wet season. Most of the contractors are aware of this and maintain compliance.

C.6.f ▶ Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance

Section 7 – Provision C.7. Public Information and Outreach

C.7.b.ii.1 ▶ Advertising Campaign

Summarize advertising efforts. Include details such as messages, creative developed, and outreach media used. The detailed advertising report may be included as an attachment. If advertising is being done by participation in a countywide or regional program, refer to the separate countywide or regional Annual Report.

Summary: Please see the countywide report.

C.7.b.iii.1 ▶ Pre-Campaign Survey

(For the FY 10-11 Annual Report only) Summarize survey information such as sample size, type of survey (telephone survey, interviews etc.). Attach a survey report that includes the following information. If survey was done regionally, refer to a regional submittal that contains the following information:

- Summary of how the survey was implemented.
- Analysis of the survey results.
- Discussion of the outreach strategies based on the survey results.
- Discussion of planned or future advertising campaigns to influence awareness and behavior changes regarding trash/litter and pesticides.

Place an X in the appropriate box below:

	Survey report attached
X	Reference to regional submittal:

C.7.c ▶ Media Relations

Summarize the media relations effort. Include the following details for each media pitch in the space below, AND/OR refer to a regional report that includes these details:

- Topic and content of pitch
- Medium (TV, radio, print, online)
- Date of publication/broadcast

Summary: Please see the countywide report.

C.7.d ▶ Stormwater Point of Contact

(For FY 09-10 Annual Report only, unless changes made) Provide details of website or phone number used as the point of contact. Report on how the point of contact is publicized and maintained. If any change occurs in this contact, report in a subsequent Annual Report.

Contact Summary: All inquiries are reported to Gratien Etchebehere, the Community Preservation Officer or Eunejune Kim, the Deputy Town Engineer at (650) 851-6790.

C.7.e ▶ Public Outreach Events

Describe general approach to event selection. Provide a list of outreach materials and giveaways distributed. Use the following table for reporting and evaluating public outreach events

Event Details	Description (messages, audience)	Evaluation of Effectiveness
Provide event name, date, and location. Indicate if event is local, countywide or regional.	Identify type of event (e.g., school fair, farmers market etc.), type of audience (school children, gardeners, homeowners etc.) and outreach messages (e.g., Enviroscene presentation, pesticides, stormwater awareness)	Provide general staff feedback on the event (e.g., success at reaching a broad spectrum of the community, well attended, good opportunity to talk to gardeners etc.). Provide other details such as: <ul style="list-style-type: none"> • Estimated overall attendance at the event. • Number of people that visited the booth, comparison with previous years • Number of brochures and giveaways distributed • Results of any spot surveys conducted
Earth Day on the Bay, Redwood City, 4/17/2010, 9am-5pm, and it is a local event.	Lively, friendly crowd all there to learn about water and marine issues.	The overall attendance was several thousand and 375 people at the booth. They gave out lots of material for both adults and children.
See the county wide program event.		

C.7.f. Watershed Stewardship Collaborative Efforts

Summarize watershed stewardship collaborative efforts and/or refer to a regional report that provides details. Describe the level of effort and support given (e.g., funding only, active participation etc.). State efforts undertaken and the results of these efforts. If this activity is done regionally refer to a regional report.

Evaluate effectiveness by describing the following:

- Efforts undertaken
- Major accomplishments

Summary: Please visit the watershed stewardship resource guide on the "flows to bay" website.

C.7.g. Citizen Involvement Events

List the types of events conducted (e.g., creek clean up, storm drain inlet marking, native gardening etc.). Use the following table for reporting and evaluating citizen involvement events.

Event Details	Description	Evaluation of effectiveness
Provide event name, date, and location. Indicate if event is local, countywide or regional	Describe activity (e.g., creek clean-up, storm drain marking etc.)	Provide general staff feedback on the event. Provide other evaluation details such as: <ul style="list-style-type: none"> • Number of participants. Any change in participation from previous years. • Distance of creek or water body cleaned • Quantity of trash/recyclables collected (weight or volume). • Number of inlets marked. • Data trends
Please see the Community Action Grant Page on the "flows to bay" website.		

C.7.h. ▶ School-Age Children Outreach

Summarize school-age children outreach programs implemented. A detailed report may be included as an attachment. Use the following table for reporting school-age children outreach efforts.

Program Details	Focus & Short Description	Number of Students/Teachers reached	Evaluation of Effectiveness
Provide the following information: Name Grade or level (elementary/ middle/ high)	Brief description, messages, methods of outreach used	Provide number or participants	Provide agency staff feedback. Report any other evaluation methods used (quiz, teacher feedback etc.). Attach evaluation summary if applicable.
See attachments.			

Section 8 - Provision C.8 Water Quality Monitoring

C.8 ► Water Quality Monitoring

State below if information is reported in a separate regional report. Municipalities can also describe below any Water Quality Monitoring activities in which they participate directly, e.g. participation in RMP workgroups, fieldwork within their jurisdictions, etc.

Summary: Separate

Section 9 – Provision C.9 Pesticides Toxicity Controls

C.9.a ▶ Adopt an Integrated Pest Management (IPM) Policy or Ordinance			
(For FY 09-10 Annual Report only) Attach a copy of your individual IPM ordinance or policy.	<input checked="" type="checkbox"/>	Attached	<input type="checkbox"/>
Not attached, explain below			
If Not attached, explain:			

C.9.b ▶ Implement IPM Policy or Ordinance	
Report implementation of IPM BMPs by showing trends in quantities and types of pesticides used, and suggest reasons for increases in use of pesticides that threaten water quality, specifically organophosphorous pesticides, pyrethroids, carbaryl, and fipronil. A separate report can be attached as evidence of your implementation.	
Summary: The Town of Woodside does not use pesticides or herbicides or spray any chemicals.	

C.9.c ▶ Train Municipal Employees	
Enter the number of employees that applied or used pesticides (including herbicides) within the scope of their duties this reporting year.	0
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within the last 3 years.	0
Enter the percentage of municipal employees who apply pesticides who have received training in the IPM policy and IPM standard operating procedures within the last three years.	0

C.9.d. ▶ Require Contractors to Implement IPM

Did your municipality contract with any pesticide service provider in the reporting year?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
If yes, attach one of the following:				
<input type="checkbox"/>	Contract specifications that require adherence to your IPM policy and standard operating procedures, OR			
<input type="checkbox"/>	Copy(ies) of the contractors' IPM certification(s) or equivalent, OR			
<input type="checkbox"/>	Equivalent documentation.			
If not attached, explain:				

C.9.e. ▶ Track and Participate in Relevant Regulatory Processes

Summarize participation efforts, information submitted, and how regulatory actions were affected OR reference a regional report that summarizes regional participation efforts, information submitted, and how regulatory actions were affected.

Summary: NA

C.9.f. ▶ Interface with County Agricultural Commissioners

Provide a summary of improper pesticide usage reported to County Agricultural Commissioners and follow-up actions to correct violations, if any. A separate report can be attached as your summary.

Summary: NA

C.9.h.ii. ▶ Public Outreach: Point of Purchase

Provide a summary of public outreach at point of purchase, and any measurable awareness and behavior changes resulting from outreach (here or in a separate report); OR reference a report of a regional effort for public outreach in which your agency participates.

Summary: The Town has brochures posted that lists "non toxic" pesticides and herbicides.

--

C.9.h.vi ▶ Public Outreach: Pest Control Operators

Provide a summary of public outreach to pest control operators and landscapers and reduced pesticide use (here or in a separate report); **OR** reference a report of a regional effort for outreach to pest control operators and landscapers in which your agency participates.

Summary: The county wide program offers training for landscapers on how to reduce the use of chemicals and which chemicals are better to use.

Section 10 - Provision C.10 Trash Load Reduction

C.10.a.i ▶ Short-Term Trash Loading Reduction Plan

(For FY 10-11 Annual Report only) Provide description of actions/tasks initiated/conducted/completed in developing a Short-Term Trash Loading Reduction Plan (due February 1, 2012).

Description: *Town staff has discussed this issue at the countywide meetings.*

C.10.a.ii ▶ Baseline Trash Load and Trash Load Reduction Tracking Method

(For FY 10-11 Annual Report only) Provide description of actions/tasks initiated/conducted/completed to gather trash loading data and develop a Baseline Trash Load and Trash Load Reduction Tracking Method (due February 1, 2012).

Description: *Town staff has discussed this issue at the countywide meetings.*

C.10.a.iii ▶ Minimum Full Trash Capture

(For FY 10-11 Annual Report and Each Annual Report Thereafter) Provide a description of actions/tasks initiated/conducted/completed in implementing Minimum Full Trash Capture Devices (due July 1, 2014) within individual jurisdictions. Include information on Full Trash Capture Devices installed under Bay-area Wide Trash Capture Demonstration Project administered by San Francisco Estuary Partnership.

Description: *Town staff has discussed this issue at the countywide meetings. Staff has realized that we are exempt from this requirement but we are considering our options.*

C.10.b.iii ▶ Trash Hot Spot Assessment

(For FY 10-11 Annual Report and Each Annual Report Thereafter) Provide volume of material removed from each Trash Hot Spot cleanup, and the dominant types of trash (e.g., glass, plastics, paper) removed and their sources to the extent possible. Provide required photo documentation.

Fill out the following table or attach a summary of the following information.

Trash Hot Spot	Cleanup Date	Volume of Material Removed	Dominant Type of Trash	Trash Sources (where possible)
The hot spot will be cleaned up the 9/15/2010				

C.10.d Summary of Trash Load Reduction Actions

Provide summary of new trash load reduction actions or increased levels of implementation of existing actions that were implemented after adoption of the MRP (control measures and best management practices) including the types of actions and levels of implementation, and the total trash loads and dominant types of trash removed from each type of action.

Suggested trash load reduction actions to track and report may include:

- Anti-litter Campaigns
- Anti-litter/Dumping Enforcement Activities
- Curbside Recycling Programs
- Education and Outreach Efforts
- Free Trash Pickup/Dropoff Days
- County HHW Program Activities
- Improved Trash Bin Management
- Inspection/Maintenance of Storm Drain Outfalls
- Litter Pickup and Control
- Removal of Homeless Encampments
- Solid Waste Recycling Efforts
- Source Controls/Bans/Prohibitions
- Storm Drain Operation and Maintenance
- Storm Drain Signage/Marking
- Street Sweeping Activities
- Trash Removal from Receptacles
- Volunteer Creek Cleanups

Type of Trash Load Reduction Action	Date of First Implementation	Level of Implementation (specify if level was increased after MRP adoption)	Total Trash Load Removed by Action	Dominant Types of Trash Removed by Action

Section 11 - Provision C.11 Mercury Controls

C.11.a.i ▶ Mercury Recycling Efforts

List below or attach lists of efforts to promote, facilitate, and/or participate in collection and recycling of mercury containing devices and equipment at the consumer level (e.g., thermometers, thermostats, switches, bulbs).

NA

C.11.a.ii ▶ Mercury Collection

Provide an estimate of the mass of mercury collected through these efforts, or provide a reference to a report containing this estimate.

Amount collected: NA

FY 2009-2010 Annual Report
Permittee Name: Town of Woodside

C.11 – Mercury Controls

- C.11.b ▶ Monitor Methylmercury
- C.11.c ▶ Pilot Projects to Investigate and Abate Mercury Sources in Drainages
- C.11.d ▶ Pilot Projects to Evaluate and Enhance Municipal Sediment Removal and Management Practices
- C.11.e ▶ Conduct Pilot Projects to Evaluate On-Site Stormwater Treatment via Retrofit
- C.11.f ▶ Diversion of Dry Weather and First Flush Flows to POTWs
- C.11.g ▶ Monitor Stormwater Mercury Pollutant Loads and Loads Reduced
- C.11.h ▶ Fate and Transport Study of Mercury in Urban Runoff
- C.11.i ▶ Development of a Risk Reduction Program Implemented Throughout the Region
- C.11.j ▶ Develop Allocation/Sharing Scheme with Caltrans

State below if information is reported in a separate regional report. Municipalities that participate directly in regional activities to can provide descriptions below.

Summary: NA

Section 12 - Provision C.12 PCBs Controls

C.12.a.i.iii ▶ Municipal Inspectors Training

(For FY 09-10 Annual Report only) List below or attach description of results of training municipal industrial inspectors to identify, in the course of their existing inspections, PCBs or PCB-containing equipment.

Description: NA

C.12.a.ii.iii ▶ Ongoing Training

(For FY 10-11 Annual Report and Each Annual Report Thereafter) List below or attach description of ongoing training development and inspections for PCB identification, including documentation and referral to appropriate regulatory agencies (e.g. county health departments, Department of Toxic Substances Control, California Department of Public Health, and the Water Board) as necessary.

Description: NA

- C.12.b ▶ Conduct Pilot Projects to Evaluate Managing PCB Containing Materials and Wastes during Building Demolition and Renovation Activities
- C.12.c ▶ Pilot Projects to Investigate and Abate On-land Locations with Elevated PCB Concentrations
- C.12.d ▶ Conduct Pilot Projects to Evaluate and Enhance Municipal Sediment Removal and Management Practices
- C.12.e ▶ Conduct Pilot Projects to Evaluate On-Site Stormwater Treatment via Retrofit
- C.12.f ▶ Diversion of Dry Weather and First Flush Flows to POTWs
- C.12.g ▶ Monitor Stormwater PCB Pollutant Loads and Loads Reduced
- C.12.h ▶ Fate and Transport Study of PCBs in Urban Runoff
- C.12.i ▶ Development of a Risk Reduction Program Implemented Throughout the Region

State below if information is reported in a separate regional report. Municipalities that participate directly in regional activities to can provide descriptions below.

Summary: NA

Section 13 - Provision C.13 Copper Controls

C.13.a.i and iii ► Legal Authority: Architectural Copper			
(For FY 10-11 Annual Report only) Do you have adequate legal authority to prohibit discharge of wastewater to storm drains generated from the installation, cleaning, treating, and washing of the surface of copper architectural features, including copper roofs to storm drains?	X	Yes	No
If No, explain and provide schedule for obtaining authority within 1 year:			

C.13.b.i and iii ► Legal Authority: Pools, Spas, and Fountains			
(For FY10-11 Annual Report only) Do you have adequate legal authority to prohibit discharges to storm drains from pools, spas, and fountains that contain copper-based chemicals?	X	Yes	No
If No, explain and provide schedule for obtaining authority within 1 year:			

C.13.c ► Vehicle Brake Pads
Reported in a separate regional report.

C.13.d.iii ► Industrial Sources Copper Reduction Results
List below or attach annotated lists or tables from your Industrial and Commercial Site Controls portion of this report, that highlight copper reduction results among the facilities identified as potential users or sources of copper, facilities inspected, and BMPs addressed. For FY09-10 describe below or highlight in the C.4 Evaluation portion (if provided) of this report the steps taken to revise your program to meet new data tracking and reporting requirements for implementation levels described in C.13.d.ii.
Summary: NA

C.13.e ▶ Studies to Reduce Copper Pollutant Impact Uncertainties

Revised. Description reads "State below if information is reported in a separate regional report. Municipalities that participate directly in regional activities to can provide descriptions below."

Summary: NA

Section 14 - Provision C.14 PBDE, Legacy Pesticides and Selenium Controls

C.14 a ► Control Programs for PBDEs, Legacy Pesticides and Selenium Controls

Revised. Description reads "State below if information is reported in a separate regional report. Municipalities that participate directly in regional activities to can provide descriptions below."

Summary: NA

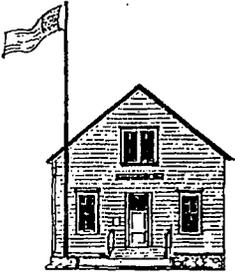
Section 15 - Provision C.15 Exempted and Conditionally Exempted Discharges

C.15.b.iii.(1), C.15.b.iii.(2) ▶ Planned and Unplanned Discharges of Potable Water

Is your agency a water purveyor?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
If No, skip to C.15.b.vi.(2):				
If Yes, Complete the attached reporting tables or attach your own table with the same information. Describe program highlights below. For FY 09-10 only, describe steps taken to revise your program to meet new monitoring, data tracking and reporting requirements.				
Summary:				

C.15.b.vi.(2) ▶ Irrigation Water, Landscape Irrigation and Lawn or Garden Watering

<p>Provide implementation summaries of the required BMPs to promote measures that minimize runoff and pollutant loading from excess irrigation. Generally the categories are:</p> <ul style="list-style-type: none"> • Promote conservation programs • Promote outreach for less toxic pest control and landscape management • Promote use of drought tolerant and native vegetation • Promote outreach messages to encourage appropriate watering/irrigation practices • Implement Illicit Discharge Enforcement Response Plan for ongoing, large volume landscape irrigation runoff.
<p>Summary: The Town of Woodside provides brochures which promote the use of less toxic pest control and landscape management and promote the use of drought tolerant landscaping.</p>



The Town of
Woodside

August 27, 2010

Mr. Bruce Wolfe
Executive Officer
San Francisco Bay Regional Water Quality Control Board
1410 Clay Street, Suite 1400
Oakland, CA 94612

RE: Town of Woodside Yearly Deliverables (June 30, 2009- July 1, 2010)
San Mateo Countywide Stormwater Pollution Prevention Program
Authorized Signature for Report Submittals

Dear Mr. Wolfe:

The attached represents the Town of Woodside's Yearly Deliverables (June 30, 2009- July 1, 2010) for the San Mateo Countywide Stormwater Pollution Prevention Program.

The Yearly Deliverables and all attachments have been prepared under my direction in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system or who are directly responsible for gathering the information, the information is to the best of my knowledge true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine for knowing violations.

P.O. Box 620005
2955 Woodside Road
Woodside, CA 94062

Sincerely,

A handwritten signature in black ink, appearing to read 'Gratien Etchebehere', written in a cursive style.

Gratien Etchebehere
Community Preservation Officer

650-851-6790

Fax: 650-851-2195

townhall@woodsidesidtown.org

C.1



The Town of
Woodside

Date: August 27, 2010

Mr. Bruce Wolfe
Executive Officer
San Francisco Bay Regional Water Quality Control Board
1410 Clay Street Suite 1400
Oakland, CA 94612

Subject: Notification of Duly Authorized Representative for the Town of
Woodside

Dear Mr. Wolfe:

This is to document the person that I am authorizing to represent the Town for signing and certifying municipal regional stormwater NPDES-permit required reports for submittal to the San Francisco Bay Regional Water Quality Control Board (Regional Water Board) and signing and certifying responses to other information requests from the Regional Water Board.

The following person, Gratien Etchebehere is duly authorized by me to sign and certify stormwater required reports for submittal to the Regional Water Board or authorize the City/County Association of Governments (C/CAG) of San Mateo County to sign and certify countywide/regional reports and studies prepared on behalf of the Town.

Gratien Etchebehere
Community Preservation Officer

P.O. Box 620005
2955 Woodside Road
Woodside, CA 94062

As describe above, the person listed above is also authorized to direct C/CAG's Executive Director or San Mateo Countywide Water Pollution Prevention Program's Stormwater Coordinator to sign and certify reports prepared by the San Mateo Countywide Water Pollution Prevention Program (Countywide Program) or Bay Area Stormwater Management Agencies Association (BASMAA) on behalf of the Town. This authorization for the submittal of countywide and BASMAA reports will typically occur by an affirmative vote of my duly authorized representative at the Countywide Program's Stormwater Technical Advisory Committee meetings, but the authorization may also be obtained through email, telephone, face to face contact, or other method of communication.

This notification will remain in effect until it is changed by me or my successor.

Very truly yours,

A handwritten signature in black ink that reads "Susan George". The signature is written in a cursive, flowing style.

Susan George
Town Manager

650-851-6790
Fax: 650-851-2195
townhall@woodsidetown.org

C.2



**SITE SPECIFIC STORMWATER POLLUTION PREVENTION PLAN
FOR CORPORATION YARD/MAINTENANCE FACILITY
Town of Woodside**

**Date Originally Prepared: 3/12/2010
Date Last Update: None**

1.0 Introduction

This site specific stormwater pollution prevention plan (SWPPP) serves as the Town of Woodside's SWPPP for its corporation yard. This SWPPP is based on experience that the Town has gained since the San Mateo Countywide Water Pollution Prevention Program (Countywide Program) prepared its "Model Stormwater Pollution Prevention Plan for Corporation Yards" (Model Plan) in 1995. The Model Plan provided a general framework for assisting municipalities to identify any stormwater pollutant generation problems at their corporation yards and to plan for needed improvements. The 1995 Model Plan encouraged each municipality to describe existing and planned best management practices (BMPs) for common corporation yard activities. The Model Plan was developed to improve corporation yard practices based on the following deficiencies commonly found at that time:

1. A number of wash racks at corporation yards were connected to the storm drain system instead of receiving pre-treatment and being discharged to the sanitary sewer¹;
2. There was an inadequate use of BMPs for the outdoor storage of materials and wastes, including lack of containment of waste materials collected from sweeping streets and cleaning storm drain systems; and
3. There was a lack of spill kits at fueling areas.

The San Francisco Bay Regional Water Quality Control Board adopted a municipal regional stormwater permit (MRP) on October 14, 2009, and the MRP became effective on December 1, 2009. One of the requirements of the MRP is for municipalities to implement the Corporation Yard BMP Implementation section of the permit (Provision C.2.f). These requirements are summarized as follows:

"prepare, implement, and maintain a site specific Stormwater Pollution Prevention Plan (SWPPP) for corporation yards, including municipal vehicle maintenance, heavy equipment and maintenance vehicle parking areas, and material storage facilities to comply with water quality standards. Each SWPPP shall incorporate all applicable BMPs that are described in the California Stormwater Quality Association's Handbook for Municipal Operations and the Caltrans Storm Water Quality Handbook Maintenance Staff Guide, May 2003, and its addenda, as appropriate."

The site specific SWPPP is required to be completed by July 1, 2010. In addition, municipalities are required to:

¹ The San Mateo Countywide Stormwater Pollution Prevention Program's Fiscal Year 1994/95 Annual Report stated that eight of the nineteen municipalities inspected had wash racks connected to the storm drain system

"(1) Implement BMPs to minimize pollutant discharges in stormwater and prohibit non-stormwater discharges, such as wash waters and street sweeper, vactor, and other related equipment cleaning wash water. Pollution control actions shall include, but not be limited to, good housekeeping practices, material and waste storage control, and vehicle leak and spill control.

(2) Routinely inspect corporation yards to ensure that no non-stormwater discharges are entering the storm drain system and, during storms, pollutant discharges are prevented to the maximum extent practicable. At a minimum, an inspection shall occur before the start of the rainy season."

2.0 Related Pollution Prevention Plans

In addition to this SWPPP, there are two *[modify number as appropriate for your municipality]* other existing plans that describe pollution prevention activities at the corporation yard facility. A Spill Prevention Control and Countermeasure (SPCC) Plan was prepared in accordance with requirements set forth in Title 40 of the Federal Code of Regulations. The SPCC Plan contains operating guidelines for spill prevention and control of petroleum hydrocarbons stored at the facility. In addition, spill response procedures and an inventory of the hazardous materials stored at this facility are described in the facility's Hazardous Materials Business Plan (AB 2185 Business Plan).

This site specific SWPPP was developed by considering the SPCC plan; the facility's Hazardous Materials Business Plan; the Countywide Program's Template Site Specific SWPPP Plan; specific activities conducted at the corporation yard; the Countywide Program's existing BMPs²; and the new MRP's requirements including all applicable and appropriate BMPs described in the California Stormwater Quality Association's Handbook for Municipal Operations (2003) and Caltrans' Storm Water Quality Handbook Maintenance Staff Guide (2003).

3.0 Facility Description

The corporation yard is located at 2955 Woodside Road and comprises approximately .5 acres. The following activities are conducted at the corporation yard:

1. Vehicle and equipment washing;
2. Vehicle and equipment maintenance and repair;
3. Fuel dispensing;
4. Municipal vehicle, heavy equipment, and employee parking;
5. Waste and recycling storage; and
6. Outdoors materials storage.

The *Town of Woodside* uses appropriate BMPs to minimize the potential contribution of pollutants to stormwater and to prevent the possibility of creating a nonstormwater discharge disallowed by the MRP.

The facility site map (Figure 1) depicts the corporation yard and provides the following information:

- Boundaries of the corporation yard;

² The Countywide Program's "Tips for a Cleaner Bay How Your Business Can Prevent Stormwater Pollution" and the "Vehicle Service Facility BMPs" are particularly relevant.

- Footprint of all buildings, structures, and paved areas including parking lots.
- Location of activities that could potentially contribute pollutants to stormwater or cause a nonstormwater discharge;
- Stormwater collection and conveyance system including the direction of stormwater drainage to storm drain inlets at the facility;
- On-site surface water bodies, if any;
- Portions, if any, of the corporation yard impacted by run-on from surrounding areas;
- Locations of any BMPs that prevent stormwater pollution, treat stormwater runoff, or recycle washwaters for discharge to the sanitary sewer.

Insert a figure showing the corporation yard with the appropriate information or modify the list of items included on the figure to cover what is reasonably available or delete above text that refers to having a facility site map

4.0 Corporation Yard Pollution Prevention Team

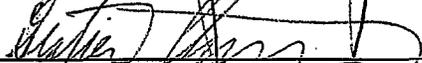
The stormwater pollution prevention team responsible for assisting the corporation yard's management to implement, maintain, provide training, and update this site-specific SWPPP and conduct corporation yard inspections consists of the following individual(s):



 Paul Nagegast, Public Works Director



 Antonio Corgas, Maintenance Supervisor



 Gratien Etchebehere, Community Preservation Officer

5.0 Corporation Yard BMPs

The following sections describe general BMPs and activity specific BMPs that are used at the corporation yard to minimize the discharge of pollutants in stormwater to the maximum extent practicable and to effectively prohibit non-stormwater discharges that are disallowed by the MRP.

5.1 General Good Housekeeping BMPs

Good housekeeping, such as maintaining a clean and orderly facility, is practiced at the corporation yard in order to minimize the risk of contributing litter and other pollutants to stormwater. In addition, pollution prevention practices are used at the corporation yard to prevent pollutants from coming in contact with stormwater runoff. Examples of good housekeeping and pollution prevention practices employed include the following BMPs:

- A clean and orderly corporation yard is maintained.
- Materials that have the potential to discharge pollutants to stormwater are covered prior to predicted rains and during rainfall events if these materials cannot be stored permanently under a roofed or covered area.
- Container lids are closed when not in use.
- Storm drain inlet labels are maintained.

- A sufficient number of covered litter receptacles are provided at the corporation yard and they are cleaned out frequently enough to prevent overflow and spillage.
- Materials and wastes that may be spilled or mobilized by stormwater are stored as far away from storm drain inlets as practical.
- Vehicles and equipment are maintained to minimize drips and leakage.
- Drip pans or absorbent pads are used under leaking vehicles and equipment to capture fluids.
- Spill clean up occurs promptly.
- Spill containment kits are stored in locations that have the potential for spills.
- Washwaters and other non-stormwater discharges disallowed by the MRP are prevented from being discharged to the storm drain system.
- Maintenance staff who work at the corporation yard have been trained on the use of these general good housekeeping BMPs.
- The corporation yard is inspected quarterly to make sure BMPs are being appropriately used.

5.2 Activity Specific BMPs

The following BMPs or their equivalent are implemented at the Town's corporation yard in order to comply with the MRP's requirements.

Vehicle and Equipment Washing

The following vehicle and equipment washing BMPs are used at the corporation yard.

1. There is an outdoor equipment washing area that has the following characteristics: The area is paved and surrounded by berms or graded to prevent washwaters from flowing off and stormwater from adjoining areas from flowing onto the wash area. The wash area is sloped for washwater collection. Washwaters drain to an oil-water separator.
2. A trash container is provided in or nearby the wash area.

Vehicle and Equipment Maintenance and Repair

The BMPs listed in this section are used to prevent or reduce the discharge of pollutants to stormwater from vehicle and equipment maintenance and repair activities.

1. Vehicle and equipment maintenance and repair activities are conducted indoors whenever feasible.
2. Maintenance activity areas are kept clean, well organized, and equipped with clean up supplies.
3. Vehicles and equipment are maintained to minimize drips and leakage.
4. Used fluids are promptly transferred to the proper waste or recycling drums/containers. Drain and drip pans or open containers are not left lying around.
5. Dry clean up methods, such as sweeping, vacuuming, and/or a damp mop, are used. Vehicle equipment and maintenance and repair areas are never hosed down unless all of the washwater is collected and disposed to the sanitary sewer.
6. The vehicle and equipment maintenance and repair area is swept at least weekly.
7. Drip pans are used under leaky vehicles and equipment, and absorbent pads and materials are used as appropriate.
8. Used absorbent material from cleaning small spills is promptly and properly removed.

9. Outdoor vehicle and equipment maintenance are not performed during rain events unless required by emergency conditions.
10. If temporary work must be conducted outdoors, a tarp, ground cloth, or drip pan is placed under the vehicle or equipment to capture spills and drips.
11. Staff responsible for vehicle and equipment maintenance and repair has been trained on the use of these BMPs and refresher training occurs on a regular basis.

Fuel Dispensing

The Town of Woodside does not have a fuel dispensing area for their vehicles.

Municipal Vehicle, Heavy Equipment, and Employee Parking

The following BMPs for municipal and employee parking areas are used to control potential stormwater pollutants, such as litter and oil from leaking vehicles.

1. Parking lots are kept clean and orderly. Litter and debris are removed in a timely fashion.
2. Parking lots are swept weekly to prevent the accumulation of litter and debris.
3. When surface cleaning is needed, BASMAA's³ "Pollution from Surface Cleaning" BMPs are used.
4. Heavy equipment is inspected for leaks each work week and repairs are made as soon as possible.
5. Drip pans or absorbent material are used under leaking vehicles and equipment to capture fluids until repairs can be made.
6. Parking lots are inspected at least weekly to assure compliance with these BMPs.
7. Staff who park municipal vehicles, heavy equipment, and private vehicles at the corporation yard have been trained on the use of these BMPs.

Waste and Recycling Storage

The following waste handling and storage BMPs are used to prevent wastes and recyclables from contributing pollutants to stormwater or causing a non-stormwater discharge disallowed by the MRP.

1. Waste collection and recycling areas are kept clean.
2. Dumpster and waste recycling areas are inspected, swept, and picked up daily during work days.
3. Rubbish and recyclables that have been collected from streets and storm drains are stored under a roof or cover, if possible. Dumpsters and recycling containers are not overfilled, and lids are kept closed when not in use.
4. Hazardous wastes are stored in compliance with hazardous waste regulations including the use of appropriate containers constructed of compatible materials with the lids securely closed when not in use.
5. An ample supply of appropriate spill cleanup materials is located near waste storage areas.

³ Bay Area Stormwater Management Agencies Association.
<http://www.basmaa.org/Portals/0/documents/pdf/Pollution%20from%20Surface%20Cleaning.pdf>

6. In the event of a spill, dry clean up methods are used.
7. Staff responsible for waste storage has been trained on the use of these BMPs, and refresher training occurs on a regular basis.

Outdoor Material Storage

The Town of Woodside does not store materials outside, but buys them as needed.

C.4

Town of Woodside

Enforcement Response Plan for the Municipal Stormwater Program

Agency: Town of Woodside

Dated: April 1, 2010

Description and Purpose of Enforcement Response Plan

This enforcement response plan (ERP) provides guidance to inspection staff to assist them to take consistent actions needed to achieve effective and timely compliance with the municipality's stormwater ordinance and other enforcement authorities allowed by the local municipal code. The ERP was developed to comply with the following sections of the municipal regional stormwater permit (MRP):

- Industrial and Commercial Site Controls – ERP (Provision C.4.c);
- Illicit Discharge Detection and Elimination – ERP (Provision C.5.b); and
- Construction Site Control – ERP (Provision C.6.b).

As shown in Appendix A these different MRP sections contain similar, but not identical requirements for developing and implementing an ERP. This template integrates the requirements from these three different MRP provisions into one ERP to facilitate consistent enforcement response within the agency.

The selection of an appropriate enforcement action and the escalation of enforcement are based on the seriousness of the violation and the violator's response to the agency's previous attempts to achieve compliance. The ERP includes suggested amounts of time to allow for the correction of violations based on the goal stated in the MRP¹. The nature of a specific violation may require tailoring of the timeframes for correction and/or the use of temporary measures to promptly address a violation before a permanent solution may be implemented. As required by the MRP, this ERP also describes when it may be appropriate to refer violations to another agency, such as the San Francisco Bay Regional Water Quality Control Board (Water Board), for additional enforcement.

The agency has authority to enforce municipal stormwater control requirements under the following sections of its municipal code:

- 1) Grading Ordinance: Section 151.20
- 2) Public Nuisance: Section 10.60

Types of Enforcement Actions and Their Use

This ERP describes a range of enforcement options available for use to encourage prompt correction of violations and the prevention of conditions that pose a threat to cause future violations. There are administrative and judicial (civil and criminal) remedies in the stormwater ordinance and other parts of the agency's code that provide a range of discretionary options for responding appropriately to a given violation depending on the magnitude of the violation, the duration and history of non-compliance, the good faith efforts of the violator to achieve compliance, and whether the violation may interfere with the agency's compliance with the MRP. The following table lists and describes available enforcement actions, provides examples of their use, and lists suggested time schedules for compliance.

¹ The MRP states that violations must be corrected in a timely manner with a goal of correction before the next rain event, but not longer than 10 business days after discovery unless agency staff document reasons why a longer period is needed in the agency's database or equivalent

Town of Woodside

Enforcement Actions² Overview

Enforcement Actions	Use	Examples			Suggested Time Schedule to Achieve Compliance
		Industrial/Commercial Business	Illicit Discharge	Construction Site	
Verbal Warning	For <u>threatened violations</u> due to inadequate housekeeping, lack of appropriate BMPs to prevent pollution, or threatened non-stormwater discharges disallowed by MRP.	Inappropriate storage of material out-of-doors that may contribute to pollutants in stormwater during rainfall, such as lids on dumpster being left open.	A wash area is present where washwaters may flow to MS4 based on the configuration, operational procedures, or evidence of a possible discharge.	Lack of an updated erosion control plan that reflects current conditions at a construction site.	Before the next rainfall event, but not longer than 10 business days, unless more timely compliance is feasible or other exceptions apply ³ .
Written Warning/ Notice of Violation	Issue for <u>minor violations</u> or if the response to a verbal warning is inadequate. A written warning may be in the form of a written inspection report, such as a completed Standard Stormwater Facility Inspection Report Form; letter; or checklist that describes	Use of best management practices that are almost effective, but do not achieve the maximum extent practicable standard, for the pollutant generating activity they are intended to control.	A non-stormwater discharge that is not specifically allowed by the MRP, but might be if adequate documentation and procedures had been followed to verify the adequate control of pollutants and obtain necessary	Lack of having a copy of the Stormwater Pollution Prevention Plan at the construction site.	Before the next rainfall event, but not longer than 10 business days, unless more timely compliance is feasible or other exceptions apply ² .

² Where allowed by local municipal code, enforcement actions may include cost recovery for municipal staff time and associated expenses to initiate and track enforcement, conduct recordkeeping, collect and test samples, and verify a return to compliance.

³ The MRP states that violations must be corrected in a timely manner with a goal of correction before the next rain event, but not longer than 10 business days after discovery unless agency staff document reasons why a longer period is needed in the agency's database or equivalent.

Enforcement Actions² Overview (continued)

Enforcement Actions	Use	Examples			Suggested Time Schedule to Achieve Compliance
		Industrial/Commercial Business	Illicit Discharge	Construction Site	
	violations, expected corrections, and schedule for correction.		approvals.		
Notice to Comply	Issue for <u>major violations</u> or if the response to written warning is inadequate. A notice to comply may be in the form of a cease and desist order ⁴ , notice to clean ² , notice to abate ⁵ , or a letter that describes violations, expected corrections, and schedule for correction.	Use of best management practices that are ineffective for the pollutant generating activity they are intended to control.	Discharge of non-stormwater discharges to MS4 that contain soap or other pollutants.	Inadequate use of BMPs to control sediment runoff from a construction site.	Before the next rainfall event, but not longer than 10 business days, unless more timely compliance is feasible or other exceptions apply ² If more time is needed than provided above, consider issuing a stop work order for construction sites, or requiring the immediate cessation of pollutant or illicit discharge generating activities until long-term remedies may be implemented.

Escalation of Enforcement Actions

This ERP incorporates a progressive enforcement response policy that is designed to maintain a fair and equitable system for enforcement to ensure that enforcement actions are proportionate to the violations, to provide maximum flexibility and effectiveness of enforcement actions, and to provide a system of escalating enforcement actions to encourage prompt compliance. The stormwater ordinance and other municipal codes allow for a degree of enforcement flexibility and a range of enforcement options that are needed to most efficiently gain compliance. An enforcement action may be upgraded or escalated depending on the circumstances of the case.

Joint Compliance Inspections

⁴ The model stormwater ordinance provides that an authorized enforcement official may issue cease and desist orders and notices to clean.

⁵ The model stormwater ordinance provides that any condition caused or permitted to exist in violation of the stormwater ordinance is a nuisance and may be summarily abated and/or restored by any enforcement official.

Enforcement Actions² Overview (continued)

In some situations it is appropriate to have joint compliance inspections with other agencies because the nature of the violation or because the violations are ongoing or repeated violations and may benefit from the enforcement options provided by other environmental statutes. Using the results of a joint compliance inspection, the regulatory agencies will be able to decide how to most efficiently achieve compliance.

Referral to Other Agencies

The MRP states that where enforcement tools are inadequate, the violations should be referred to the Regional Water Board, district attorney, or other relevant agencies for additional enforcement (Provision C.4.c). The legal enforcement action may include referral to the San Mateo County District Attorney Environmental Crimes Unit. Referrals may also be made to the California Department of Fish and Game and possibly to the U.S. Environmental Protection Agency, if the Regional Water Board staff is unable to provide effective assistance.

Appendix A

Comparison of Municipal Regional Stormwater Permit's Enforcement Response Plan Requirements

Task Description	Provision C.4 Industrial/Commercial	Provision C.5 Illicit Discharge Detection/Elimination	Provision C.6 – Construction Site Control
Overall Description	Develop and implement ERP that serves as <u>inspection staff's</u> reference document to take <u>consistent actions to achieve timely and effective</u> compliance.	Develop and implement an ERP that will serve as guidance for <u>inspection staff</u> to take <u>consistent actions to achieve timely and effective</u> abatement of illicit discharges.	Develop and implement ERP that serves as <u>inspection staff's</u> reference document to take <u>consistent actions to achieve timely and effective</u> compliance. {identical to Prov. C.4)
Required Enforcement Actions/Recommended Responses	Include <u>timeframes for correction of various field violation scenarios</u> and <u>provide guidance</u> on appropriate use of various <u>enforcement tools</u> , such as verbal and written notices, <u>citations</u> , <u>cleanup requirements</u> , <u>administrative and criminal penalties</u> .	Include <u>timeframes for correction of various types and degree of violations</u> . ERP will provide <u>guidelines</u> on when to employ the range of <u>regulatory responses</u> from warnings, <u>citations and cleanup</u> and cost recovery, to <u>administrative or criminal penalties</u> .	Include <u>timeframes for correction of problems for various field violation scenarios</u> .
Timely Correction of Violations	States <u>violations as a goal should be corrected before the next rain event, but no longer than 10 business days after discovery unless reasons are recorded in Permittee's database or equivalent</u> . Include appropriate time periods for each level of corrective action. Describe permittee's procedures for follow up inspections, enforcement actions, and referral to another agency.	<u>Goal of correcting violations before the next rain event but not longer than 10 business days after discovery unless rationale is recorded in database or equivalent</u> . Immediate correction can be temporary and short-term if a long-term, permanent correction will involve significant resources and construction time. An example of replumbing a wash area is described.	All violations must be corrected in a timely manner with <u>goal of correcting them before the next rain event but no longer than 10 business days after</u> the violations are <u>discovered</u> . If more than 10 business days are required for compliance, a <u>rationale</u> shall be <u>recorded in database or equivalent</u> .
Escalation of Enforcement/Referrals	Enforce stormwater ordinances as necessary to achieve compliance. Where enforcement tools are inadequate, <u>refer</u> the case to the Water Board, district attorney or <u>other relevant agencies</u> for additional enforcement.	If corrective actions are not implemented promptly or if there are repeat violations, permittees shall <u>escalate responses</u> as needed to achieve compliance, including <u>referral to other agencies</u> where necessary.	Take <u>progressively stricter responses</u> to achieve compliance. ERP shall include structures for progressively stricter responses & various violation scenarios that evoke progressively stricter responses.
Recordkeeping	Maintain adequate records to demonstrate compliance and	All incidents or discharges reported to the complaint/spill system that might pose a	Specific information required for each inspection and problems

Task Description	Provision C.4 Industrial/Commercial	Provision C.5 Illicit Discharge Detection/Elimination	Provision C.6 – Construction Site Control
	appropriate follow-up enforcement responses. Lists specific information that should be tracked regarding business inspections; list includes type of enforcement and problem resolution.	threat to water quality shall be logged to track follow up and response through problem resolution. Data collected shall be sufficient to demonstrate escalating responses to repeated problems, and inter/intra-agency coordination, where appropriate. Specific spill and discharge complaint tracking information requirements are listed in Provision C.5.f.ii.	found and resolved is listed in Provision C.6.e.ii.(4).
Reporting	Lists information for inclusion in the annual report including number and percent of violations resolved within 10 working days or otherwise resolved in a longer but still timely manner. Frequency and types/categories of violations observed. Frequency and type of enforcement. Summary of types of violations by business category.	Number of discharges reported; number of discharges reaching storm drains and/or receiving waters; number and percentage of discharges resolved in a timely manner; and summary of major types of discharges and complaints.	Reporting of inspection results is required in Provision C.6.e.iii. Agencies must report the number and percentage of each type of enforcement action listed in its ERP.
Time Frame for Development and Implementation of ERP	April 1, 2010	April 1, 2010	April 1, 2010



**INDUSTRIAL AND COMMERCIAL BUSINESS INSPECTION PLAN
Town of Woodside**

Date Originally Prepared: 8/10/2010

Date Last Updated: 8/10/2010

BACKGROUND

This industrial and commercial business inspection plan (Inspection Plan) serves as the Town's prioritized inspection work plan that the Town will implement to comply with the municipal regional stormwater permit's (MRP) Provision C.4.b requirements. This MRP provision requires that an Inspection Plan be developed. The Inspection Plan's attached Prioritized Inspection List of Businesses (Inspection List) must be submitted with the 2010 Annual Report, and an annually updated Inspection List must be submitted with subsequent annual reports.

Municipal staff used the following steps to create this Inspection Plan and comply with the MRP. Steps 1 and 2 address MRP requirements for the Inspection Plan and Step 3 addresses compliance with MRP requirements for creating an Inspection List that is included as an attachment to the Inspection Plan.

Steps

1. Identify a method of establishing priorities for inspections and the frequency of inspections for each category of priority.
2. Describe the method that will be used to identify newly opened businesses that may need inspection.
3. Develop an Inspection List that includes:
 - a. A list of all of the industrial and commercial businesses located within the municipality's jurisdiction that require inspection;
 - b. A determination of the priority for inspection of each business on the Inspection List using the identified method of establishing inspection priorities;
 - c. Identification of businesses on the Inspection List that are scheduled for inspection during the current fiscal year; and
 - d. An annual update or revision of the Inspection List starting in 2011.

Each of these steps was followed to develop this Inspection Plan as described in the following sections.

**STEP 1: IDENTIFY A METHOD OF ESTABLISHING PRIORITIES FOR INSPECTIONS AND
FREQUENCY OF INSPECTIONS**

What the MRP Requires

The MRP requires that each of the businesses to be inspected be assigned a priority for inspection based on "the potential for water quality impact using criteria such as pollutant sources on site, pollutants of concern, proximity to a waterbody, violation history of the facility, and other relevant factors" (Provision C.4.b.ii.(3)). In addition, the MRP requires that appropriate inspection frequencies be established based on the priority for inspection, "potential for contributing pollution to stormwater runoff" and be "commensurate with the threat to water quality" (Provision C.4.b.ii.(5)).

Further, the MRP requires: "A description of the process for prioritizing inspections and frequency of inspections" (Provision C.4.b.i.(2)).

Dated June 21, 2010

Description of Prioritization Process and Assignment of Inspection Frequencies to Different Priorities

→ Businesses meeting the following criteria generally have been assigned as having a high priority for inspection:

1. Retail food facilities, hazardous materials users, automotive service facilities, and hazardous waste generators that have a history of using inadequate best management practices.

All other businesses have generally been assigned as having a low priority for inspection.

→ High priority for inspection means that the business will typically be inspected annually. Low priority for inspection means that the business will be inspected less frequently than annually, such as every other year or every third year¹.

STEP 2: DESCRIBE METHOD THAT WILL BE USED TO IDENTIFY NEW BUSINESSES

What the MRP Requires

The MRP requires that the Inspection Plan have a "mechanism to include newly opened businesses that warrant inspection ..." (Provision C.4.b.i.(2)).

Description of Method for Identifying New Businesses

→ The following describes how new businesses that may warrant an inspection are identified so that they will be included on the Inspection List.

1. San Mateo County Health performs all the inspections for the Town of Woodside. They add businesses to the list when the new business obtains permits from San Mateo County Health. The inspectors will also add a business if they see it out in the field.

STEP 3: DEVELOP AN INSPECTION LIST

This step includes the following four substeps associated with the development and maintenance of the Inspection List:

- a. Develop a list of all of the industrial and commercial businesses that require inspection;
- b. Determine the priority for inspection of each business on the Inspection List;
- c. Identify businesses on the Inspection List that are scheduled for inspection during the current fiscal year; and
- d. Prepare an annual update or revision of the Inspection List starting in 2011.

What the MRP Requires

Develop a List of All Businesses Requiring Inspection

¹ The municipality may define other categories of priority and their associated inspection frequency. Most municipalities have previously used two categories of frequency for inspection and this approach has been retained in this template.

The MRP requires that the Inspection Plan be used to maintain an Inspection List of industrial and commercial businesses "that could reasonably be considered to cause or contribute to pollution of stormwater runoff" (Provision C.4.b.ii).

In particular, the MRP lists the following types of businesses as needing to be inspected if they "have a reasonable likelihood to be sources of pollutants to stormwater and non-stormwater discharges:" (Provision C.4.b.ii(2))

- 1) Industrial facilities², as defined in 40 CFR 122.26(b)(14), including those subject to the State General NPDES Permit for Stormwater Discharges Associated with Industrial Activity;
- 2) Vehicle salvage yards;
- 3) Metal and other recycled material collection facilities, waste transfer facilities;
- 4) Vehicle mechanical repair, maintenance, fueling, or cleaning;
- 5) Building trades central facilities or yards, corporation yards, nurseries, and greenhouses;
- 6) Building material retailers and storage;
- 7) Plastic manufacturers; and
- 8) Other facilities designated by the city or Water Board as having a reasonable potential to contribute to pollution of stormwater runoff. The Water Board staff places a priority on inspecting retail food facilities, and these businesses should be included in the Inspection List if they "have a reasonable likelihood to be sources of pollutants to stormwater and non-stormwater discharges."

In addition, the MRP lists the following functional aspects of businesses that may produce pollutants when exposed to stormwater as part of the criteria for developing the Inspection List:

- 1) Outdoor process and manufacturing areas;
- 2) Outdoor material storage areas;
- 3) Outdoor waste storage and disposal areas;
- 4) Outdoor vehicle and equipment storage and maintenance areas;
- 5) Outdoor wash areas;
- 6) Outdoor drainage from indoor areas;
- 7) Rooftop equipment; and
- 8) Other sources determined by the city or Water Board to have a reasonable potential to contribute to pollution of stormwater runoff.

Establish Inspection Priority for Businesses on the Inspection List

The MRP requires that businesses that have a reasonable potential to pollute stormwater runoff be prioritized using factors listed in the MRP (Provision C.4.b.ii.(3)).

Identify Businesses Scheduled for Inspection During the Current Fiscal Year

The MRP requires that the annual report include "the list of facilities scheduled for inspection during the current fiscal year" (Provision C.4.b.iii.(2)).

Annual Updates

The MRP requires that the Inspection List be annually updated and maintained (Provision C.4.b.ii). The annual updates should include new businesses; any needed modifications to inspection priorities based on recent inspections, illicit discharge notifications, or other relevant factors; and

² The MRP appears to use the terms "facilities" and "businesses" interchangeably. This template generally uses the term business since that is used in the title of Provision C.4.b., and it is the term most inspectors use.