

**STORM WATER MANAGEMENT PROGRAM
FOR THE
CITY OF LOS BANOS
REPORT OF WASTE DISCHARGE**

SEPTEMBER 14, 2003

REVISION DATE: OCTOBER 15, 2004

REVISION DATE: SEPTEMBER 30, 2005

**UNDER THE CALIFORNIA STATE WATER RESOURCES CONTROL
BOARD
GENERAL PERMIT FOR SMALL CITIES**

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State Water Resources Control Board
NOTICE OF INTENT
TO COMPLY WITH THE TERMS OF THE GENERAL PERMIT FOR
STORM WATER DISCHARGES FROM
SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS
(WATER QUALITY ORDER NO. 2003 - 0005 - DWQ)

I. NOI Status

Mark Only One Item 1. New Permittee 2. Change of Information WDID #: _____

II. Agency Information

A. Agency City of Los Banos					
B. Contact Person Raymond J. DeSa			C. Title Public Works Director		
D. Mailing Address 411 Madison Avenue			E. Address (Line 2)		
F. City Los Banos		State CA	G. Zip 93635	H. County Merced	
I. Phone (209) 827-7056		J. FAX (209) 827-7069		K. Email Address	
L. Operator Type (check one) 1. <input checked="" type="checkbox"/> City 2. <input type="checkbox"/> County 3. <input type="checkbox"/> State 4. <input type="checkbox"/> Federal 5. <input type="checkbox"/> Special District 6. <input type="checkbox"/> Government Combination					

III. Permit Area

City of Los Banos

IV. Boundaries of Coverage (include a site map with the submittal)

Properties within the current City Limits

V. Billing Information

A. Agency City of Los Banos, Public Works Department					
B. Contact Person Raymond J. DeSa			C. Title Public Works Director		
D. Mailing Address 411 Madison Avenue			E. Address (Line 2)		
F. City Los Banos		State CA	G. Zip 93635	H. County Merced	
I. Phone (209) 827-7056		J. FAX (209) 827-7069		K. Email Address ray.desa@losbanos.org	
Fees are based on the daily population served by the Small MS4. To determine your fee, consult the current fee schedule (California Code of Regulations, Title 23, Division 3, Chapter 9 Article 1), which can be viewed at www.swrcb.ca.gov/stormwtr/municipal.html .					
L. Population <u>29,139</u>					
Fee <u>\$5000.00</u>					
Check(s) should be made payable to the SWRCB and submitted to the appropriate RWQCB.					
SWRCB Tax ID is: 68-0281986					

VI. Discharger Information (check applicable box(es) and complete corresponding information)

1. Applying for Individual General Permit Coverage

2. Applying for a permit with one or more co-permittees

The undersigned agree to work as co-permittees in implementing a complete small MS4 storm water program. The program must comply with the requirements found in Title 40 of the Code of Federal Regulations, parts 122.32. Attach additional sheets if necessary. Each co-permittee must complete an NOI.

Lead Agency	Signature
Agency	Signature
Agency	Signature
Agency	Signature

3. Separate Implementing Entity (SIE)

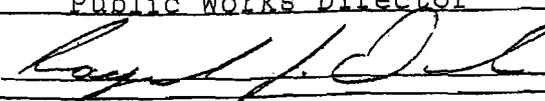
A. Agency			
B. Contact Person		C. Title	
D. Mailing Address		E. Address (Line 2)	
F. City	State CA	G. Zip	H. County
I. Phone	J. FAX	K. Email Address	
H. Operator Type (check one) 1. <input type="checkbox"/> City 2. <input type="checkbox"/> County 3. <input type="checkbox"/> State 4. <input type="checkbox"/> Federal 5. <input type="checkbox"/> Special District 6. <input type="checkbox"/> Government Combination			
Minimum Control Measures being implemented by the SIE (check all that apply)			
<input type="checkbox"/> Public Education	<input type="checkbox"/> Public Involvement	<input type="checkbox"/> Illicit Discharge/Elimination	
<input type="checkbox"/> Construction	<input type="checkbox"/> Post Construction	<input type="checkbox"/> Good Housekeeping	
<p>"I agree to coordinate with the agency identified in Section III of this form and comply with its qualifying storm water program. I certify under penalty of law that this document and all attachments were prepared under my direction and supervision 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 or persons who manage the system, or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. Additionally, I certify that the provisions of the permit, including the development and implementation of a Storm Water Management Program, will be complied with."</p>			
N. Signature of Official		Date	

VII. Storm Water Management Plan (check box)

As per section A.2. of this General Permit, the SWMP is attached.

VIII. Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision 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 or persons who manage the system, or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. Additionally, I certify that the provisions of the permit, including the development and implementation of a Storm Water Management Program, will be complied with."

A. Printed Name: <u>Raymond J. DeSa</u>
B. Title: <u>Public Works Director</u>
C. Signature: <u></u>
D. Date: <u>07/14/03</u>

II. Introduction

The City of Los Banos has experienced a relatively rapid rate of growth, in virtually every section of the City over the past several years. Regulation and disposal of runoff from these growth areas has been accomplished by capturing runoff in storm drainage detention basins and discharging the detained storm water into existing water conveyance systems.

In anticipation of new regulations, and to accommodate projected growth, the City has developed and adopted the City of Los Banos Storm Drainage Master Plan. The SDMP included implementation of the best management practices and the six control measures outlined in the attached document. The Los Banos Municipal Code, as well as the adopted Administrative Citation process, provides the enforcement means necessary to ensure compliance with the Storm Water Management Program.

The City currently performs many of the BMPs outlined in the Plan, such as street sweeping, bi-annual Citywide cleanups, storm water detention, etc. This SWMP will provide more formal guidelines and accurate accounting procedures for said activities.

This Storm Water Management Program (SWMP) describes the storm water quality management activities proposed by the City of Los Banos, California, ("City") in compliance with the federal storm water quality regulations, 40 CFR Part 122 et seq. (Phase II), Porter-Cologne Water Quality Control Act § 13376, and with the State Water Resources Control Board General Permit for Small Cities 2003-0005-DWQ, adopted 30 April 2003.

The federal and state regulations require designated MS4s to develop a plan to undertake six Minimum Control Measures (MCMs). The permittees are also required to demonstrate a 5-year work plan, with a reasonable budget for the activities. The storm water pollution prevention plan must also include appropriate performance measures for the work plan. This report describes the control measures, work plan, and budget and performance measures for the City.

The Minimum Control Measures include:

1. Public Outreach and Education
2. Public Participation and Involvement
3. Illicit Discharge Elimination
4. Construction Site BMPs over 1 Acre
5. Post Construction BMPs
6. Municipal Activities

The City provides positive storm drainage to the community. The storm drainage system includes pipelines, local and regional detention, as well as discharges to waters of the United States. Storm drainage serves residential, commercial, industrial, park and undeveloped land uses. The City is a full service municipality providing water, sewer, storm drainage, streets and parks services to the community.

The objectives of this Storm water Pollution Prevention Plan are:

- To meet the requirements of 40 CFR Part 122, Porter-Cologne Water Quality Control Act § 13376, and the SWRCB General Permit # CAS000004.
- To address storm water quality concerns specific to the community.
- To provide a plan consistent with the community's values and means.
- To involve the community in development and implementation of the plan in order to meet the requirements in the most cost-effective manner.

IV. STORM WATER MANAGEMENT PROGRAM

Approach

The permittee is taking an approach that assumes a general level of urban runoff pollution that can be addressed by a variety of citywide pollution prevention activities. Insufficient evidence is available about specific sources of pollutants and their loading rates to develop a more targeted approach. The pollution prevention activities to be undertaken are organized into the Minimum Control Measures:

1. Public Outreach and Education
2. Public Participation and Involvement
3. Illicit Discharge Elimination
4. Construction Site Best Management Practices
5. Post Construction Best Management Practices
6. Municipal Activities

The approach to storm water pollution prevention will also be an adaptive management plan. The results of each year's activities will be evaluated in preparation for the next year's work. Priorities and scheduling of activities may change from this initial plan, based on the needs of the community, to meet the overall objective of reducing the potential for pollution in urban runoff. The City of Los Banos, Public Works Department will be managing the program, with the Public Works Inspector implementing the minimum control measures. The department and inspector can be reached at (209) 827-7056.

TASK CODING: The task numbers are coded to indicate where they fit into the 5-year work plan. The first number indicates the year of the activity. The second number identifies it within the year, usually as part of a continuing program element that corresponds with one of the six Minimum Control Measures.

PUBLIC OUTREACH AND EDUCATION

The objectives of the Public Outreach and Education Element of this Storm Water Management Plan are:

- To raise public awareness that citizen's actions have an impact on storm water quality.
- To involve the public in the development of the Storm Water Management Plan, and
- To develop support for the necessary funding.

A. General Public Education on Storm Water Quality impacts and prevention measures.

The purpose of these tasks is to provide the widest communication with the general public about what they can do to prevent storm water pollution. Because Los Banos has a significant multi-lingual population, public information should be provided in at least English and Spanish. Public outreach should also be implemented at cultural events, where different groups may be reached most effectively.

Task 1.1 Develop or purchase bi-lingual public outreach and education materials, such as brochures, magnets, posters, and coloring books for general public information about storm water quality control activities.

Since the NPDES Storm water Program was established in 1991, a number of the Phase I permittees have developed a wide range of public education materials that are in the public domain, and available for use by the Phase II permittees. Examples can be found in the Model Urban Runoff Program, or by contacting the Phase I permittees.

Tasks 2.1, 3.1, 4.1, 5.1 Annually distribute educational materials to the public, schools, multi-cultural events and libraries. In addition, annually distribute 9,000 to 10,000 developed materials with municipal utility bills. Estimated figures for annual distribution of purchased and developed materials to be 12,000 to 15,000

Tasks 1.2, 2.2, 3.2, 4.2, 5.2 Distribute educational materials at point of sale of household, automotive and garden chemicals, at multi-cultural events and other relevant venues. Annually distribute information to commercial outlets, further utilizing previously described public outreach materials. Begin with 25 the first year, increasing by 25 annually, until all commercial outlets are covered.

Tasks 4.4, 5.4, Review needs and results, and conduct additional public education, based on the community's response to the first three years of outreach. At the completion of each year's public education program, each city should review the results and set priorities for the next year's target audience for storm water quality control education. For example, if a neighborhood has been the focus of education related to crankcase oil dumping in storm drains, results can be measured by the number of occurrences of such dumping before and after the education effort. The City will then conduct a public survey to assess additional needs.

B. Education of Specific Community Groups

The purpose of this task is to focus on certain business types that have a higher potential to generate pollutants in municipal runoff. The first of these are restaurants and automotive repair shops. But other businesses that may benefit from focused education include canneries, car wrecking yards, metal recycling, farm equipment repair, farm fertilizer and chemical distributors, and commercial/residential landscape service providers, vehicle steam cleaning services, pool service companies, and pest control companies. This program element can include incentives and public recognition for good environmental citizenship by businesses.

Tasks 2.3, 3.3,4.3,5.3 Prepare and distribute education materials annually to 20 or more restaurants and auto repair shops about Best Management Practices for their business.

Since the NPDES Storm water Program was established in 1991, a number of the Phase I permittees have developed public education materials to focus on the high-risk behaviors of certain businesses. Many of these public education materials are in the public domain, and available for use by the Phase II permittees. Examples can be found in the Model Urban Runoff Program, or by contacting the Phase I permittees. Santa Clara Valley Water District and the Fresno Metropolitan Flood Management District are leaders in this area.

Task 3.4 Follow-up education with restaurants and auto repair shops on annual basis.

Tasks 4.5, 5.5 Educate additional targeted business groups, with the highest potential for storm water polluting actions and distribute educational materials annually.

Depending on the results in the first three years of public education for targeted businesses, and new information gathered during the early years of the SWMP, the Cities should adapt their management plan for education of certain businesses. For example, if good results are achieved with restaurants and vehicle repair shops, then public education for business could be shifted to the next highest priority business sector.

PUBLIC PARTICIPATION AND INVOLVEMENT

The objectives of the Public Participation and Involvement Element are:

- To educate the public about the relationship between community activities and runoff pollution,
- To educate about specific pollutants and what citizens can do about them, and
- To foster participation in community-based projects and volunteer activities regarding pollution prevention.

The purpose of these activities is to support community participation in preventing and eliminating sources of pollution in urban runoff. The second purpose is to provide opportunities for the community to prioritize the types of activities that should be included in the Storm Water Management Program and any implementing ordinances, as adopted by each City Council. These two processes provide a key connection between the behaviors of the

community and most cost-effective means of preventing pollution. Notices for public hearings shall be in compliance with applicable State and local requirements.

A. Storm Drain Marking and Community Cleanup Days

Task 1.3 Purchase storm drain stencils or placards, depending on durability and ability of volunteers to mark storm drains.

Since 1991, vendors have developed and Phase I permittees have tested the effectiveness of storm drain marking devices. The City will need to evaluate marking devices best suited for their storm drain system, and the work force available to install them.

Task 2.4 Commencing with the year 2003, Mark ¼, or approximately 500, of the City's storm drains or install marking tiles using volunteers whenever possible, continuing annually to completion. Use City crews or alternative work programs when volunteers not available or appropriate.

Based on past experience, painted storm drain stencils have a useful life of about 4-5 years. Replacement of storm drain marking devices, whether painted or glued placards or tiles, will require a consistent replacement program. New development is required to install City-approved markings.

Task 3.5 Mark the next quadrant (25%) of the City's storm drains, as in Task 2.4.

Task 4.6 Mark the third quadrant (25%) of the City's storm drains, as in Task 2.4.

Task 5.6 Mark the final quadrant (25%) of the City's storm drains, as in Task 2.4.

Tasks 2.5, 3.6, 4.7 & 5.7 Conduct two annual community cleanup days with volunteers. This cleanup day can be coordinated with the County's household hazardous waste disposal schedule, with Earth Day activities, or with other community events.

ILLICIT DISCHARGE DETECTION AND ELIMINATION

The objectives of the Illicit Discharge Detection and Elimination Element are:

- To control illicit discharges or illegal connections to storm drains by methodical field surveys and investigations of the storm drain system.
- To prevent improper disposal of wastes in a program that combines public education, alternative disposal options, incentives, and enforcement as needed, and,
- To contain and clean up accidental spills with proper methods.

The purpose of this section is to provide a program under which uncontrolled sources of pollution directly discharged to storm drains are eliminated. Formulate the work plan for violations of the discharge standards, conduct field investigations and provide a complaint/spill response program.

Illicit discharges can include sewer lines improperly connected to storm drains, or improper dumping of crankcase oil, household chemicals or other deleterious materials into storm drains or streams. It can even include the discharge of chlorinated swimming pool water into a storm drain. This part of the program is the most detection and enforcement-oriented part of the SWMP.

The City should conduct an assessment of the extent and nature of any illicit discharges. The detection and elimination program can then be prioritized toward the most probable source of illicit discharges. Table III of this SWMP contains a map identifying the discharge points of the City's storm drain system. Public Works staff has been issued detailed system maps showing the collection points, direction of flow and discharge points. This map is continually updated as additional infrastructure is added to the system.

Task 1.4 Develop the outline of Illicit Discharge Detection and Elimination Program.

This task should include the work plan for periodic inspection of the storm drain system inspection checklists, procedures to prioritize sites, and the plan of action for responding to any illicit discharges identified. Illicit discharge inspection is done continually through visual inspection of storm facilities. Illicit discharges may include fixed pipeline connections from non-storm water sources, and illegal dumping into the City's storm drain system. A two-part approach is needed for each of these possible pollution sources. Illicit discharges are discovered by periodic inspection of pipelines and by responding to complaints of odors or foul water in storm drains. Responses to complaints will be continually logged and monitored. Illegal dumping detection may require a hotline system for citizen reporting of observed dumping, and education of City employees and the public to report illegal dumping. Employee education will be done semi-annually at regularly scheduled Public Works training sessions. The work plan should set priorities among the activities, and include an annual assessment step to adapt the management of the Illicit Discharge Detection and Elimination Program to the highest priorities. Responses to complaints will be continually logged and monitored. The tracking system for violations is in place through the City's Administrative Citation Process and is ongoing.

**Tasks 1.5
2.6,3.7,4.8
5.8** Conduct inspections of known illegal dump sites.

To begin first year and continue each year thereafter. Will include periodic inspection of all priority sites and response to complaint calls.

Task 1.6 Develop inspection checklists in year one.

Implement those checklists.

**Tasks 1.7,
2.7,3.8,4.9,
5.9** Pipeline inspection to be done annually.

Annual inspections will be in addition to periodic inspections, and will occur at a specific number of locations, or will cover a specific length of pipelines.

**Tasks 1.8
3.9,5.10** Perform semi-annual Public Works employee training sessions.

These sessions will focus on the inspection and detection of, and response to reported or

discovered illicit discharges. Employees will be trained in identification and reporting of illicit discharge, as well as management of complaint calls from the public.

Tasks 1.9, Conduct pilot surveillance of the targeted areas for illicit discharges. Revise the scope and the approach to detecting illicit discharges.

The first year's work on illicit discharge detection and elimination should be focused on understanding the scope of the problem, if any, and the effort that will be required to address the entire city. A pilot program will inspect a section of the City with the highest likelihood of illicit discharges. The pilot program will test various detection methods, such as TV inspection, smoke testing, or pipeline sediment testing to assess costs, equipment needs and effectiveness in detecting illicit discharges. The results of the pilot test should be used to refine a multi-year program, to address citywide illicit discharges on a periodic basis. This will include evaluation, identification, and annual reporting of any significant sources of pollutants from the list of non-storm water discharges. Currently planned to be done annually; subject to change, based on needs and funding.

Tasks.2.8, 3.10,4.10 5.11 Conduct annual survey of targeted areas of the City for illicit discharges. The performance measure will be to survey the entire City on a 5-year rotation.

Divide the City into quadrants. Lines of delineation are Highway 152 and Highway 165. Survey will begin in southwest quadrant, or that which is most heavily influenced by commercial/ industrial usage.

Task 2.9, 3.11,4.11 5.12 Eliminate illicit discharges by cooperation of property owners whenever possible, or by City action or enforcement action if necessary.

Through the adoption of the City's administrative citation process, Ordinances #949 and #950, which specifically prohibit non-storm water discharges, the City has developed a tiered procedure for prohibiting and eliminating illicit discharges and illegal dumping. The tiers include education, voluntary compliance, mandatory compliance with a violation citation, and legal action, as each case warrants. Staff responsibilities are established for each tier of enforcement. Protocols to involve the RWQCB are included.

The City, when necessary, will modify the existing Storm Sewer Ordinance to meet additional requirements or develop a new one to meet the Regional Board requirements. Erosion and sediment control, as well as non-sediment waste discharges from construction sites, are monitored and enforced currently through the existing Administrative Citation process (Ord. #949, #950).

Whenever an illicit discharge or illegal dumping situation is identified, the City, through Code Enforcement, will take action with the responsible parties to eliminate the pollution source. This is monitored on a continuous basis. Files maintained at Public Works Department, as well as Code Enforcement office.

CONSTRUCTION SITE RUNOFF CONTROL, OVER 1 ACRE

The objective of the Construction Site Runoff Control Element is:

- To develop and implement a control program to reduce the potential for the discharge of pollutants into urban runoff from construction sites over 1 acre.

In March 2003, the Federal regulations will require construction sites over 1 acre, or less than an acre if part of a larger project, to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). Construction over 5 acres has been subject to the regulations since 1991. A SWPPP describes the Best Management Practices that will be used during construction to reduce the sources of potential pollution, control sediments and educate construction workers. Under the General Storm Water Permit for Small MS4s, cities participating in the General Permit will be delegated the responsibility to require SWPPPs and inspect their implementation at construction sites. The City may consider using the existing resources, such as the State Storm Water Handbook for Construction, as guidance for Best Management Practices.

Task 1.10 Educate local developers, construction firms and Building Department staff about the new requirements for Best Management Practices during construction.

Developers and construction firms in the San Joaquin Valley have already been working with the storm water pollution program in Phase I cities and for any project over 5 acres. The Building Department has developed their own program, design standards and plan review procedures to incorporate storm water pollution prevention measures. The City will prepare handouts, design standards and guidance documents specific to the City. Workshops or distribution of a newsletter informing the development community of the new requirements will be done as needed and on a continual basis. Additionally, the City will include the following Information in the Annual Report: Numbers of workshops given, copies of agenda and attendance sheets, numbers of newsletters distributed and/or numbers of people educated on construction standards, BMPs, and relevant subjects per year.

Tasks 1.11, 2.10,3.12, 4.12,5.13 Require Storm Water Pollution Prevention Plans, (SWPPPS) in accordance with the SWRCB General Permit for Construction Activities, after March 10, 2003, for all construction over 1 acre, for both public and private projects.

Prior to March 10, 2003 the City began requiring each project over 1 acre to include storm water Pollution Prevention Measures in the design and construction of the project. All commercial sites, as well as any site over 1 acre in size, are currently reviewed by the City Engineer for applicable Storm Water Pollution Prevention Requirements. The owner or developer is required to prepare a Storm Water Pollution Prevention Plan (SWPPP) and to submit a Notice of Intent (NOI) and fee to the RWQCB. The RWQCB sends a notice back to the developer, with the project's WDID number.

In order to obtain a building permit, the developer must provide the City with a copy of the project's NOI and SWPPP. The City of Los Banos, Public Works Department reviews the SWPPP and the project plans to determine that the construction and post-construction BMPs are appropriate for controlling the potential pollutant sources from the site. This review is part of the regular plan review and building permit issuance. Prior to issuance of a permit, it will be required that all SWPPPs be reviewed for evidence of compliance with State requirements.

Task 1.12 Public Works and Building Department inspectors observe the implementation of BMPs on permitted projects to assure effectiveness.

To include observing concrete and stucco washout, containment of construction chemicals, control of dirt tracked off-site, installation of on-site pollution prevention structures, etc. Construction sites of one acre or more are inspected on a daily basis. Upon completion of project, developer sends RWQCB a Notice of Termination. This process will be ongoing.

Task 1.13 The City will modify the existing Storm Sewer Ordinance to meet additional requirements or develop a new one to meet the Regional Board requirements. Erosion and sediment control as well as non-sediment waste discharges from construction sites is monitored and enforced currently through the existing administrative citation process (Ord. 949, Ord.950).

Task 3.13 Continue training for building inspectors and plan review engineers on SWPPP requirements and best management practices.

After the initial phases of the work plan, the Building Department may need continuing education in new materials and methods of storm water pollution prevention that are relevant to new construction. The products and methods used in storm water pollution prevention are rapidly evolving. This will be done on an annual basis with all field personnel.

POST-CONSTRUCTION BMPs

The objective of the Post Construction Best Management Practices (BMP) Element is:

To reduce the potential for discharge of pollutants from new development and redevelopment areas, using a strategy that combines reducing and eliminating sources of pollutants, managing site runoff volumes and flow rates, such that they are similar to pre- construction levels, and treating runoff as appropriate.

Existing development which generates pollution will be addressed by Public Outreach and Education, and if warranted by a serious condition, by the Illicit Discharge Elimination element of the SWMP. The City may use the Existing Storm Water Handbooks, or may consider Post-Construction BMPs guidance documents, developed by Phase I cities, such as Modesto.

Task 1.14 Educate local developers, engineering firms and building department staff about post-construction BMP requirements. Prepare handouts and guidance documents.

Distribute materials annually to builders and developers, through newsletters, stakeholders meetings, etc. This task can be combined with task 1.16.

Task 1.15 Develop a model Long-Term Maintenance and Monitoring agreement for Post Construction BMPs, that will assure that BMPs are being operated and maintained on private property, and to cover costs of annual inspection.

Phase I cities have found the need to assure long-term maintenance and measurable effectiveness of post-construction BMPs by entering into an agreement with the developer. Not every project will require an agreement, only those with a high potential for pollution and complex post-construction BMPs, such as oil-water separators at gas stations.

Examples of such agreements are available from Phase I cities. Enter into and implement an agreement on appropriate projects. This task is regulated through the existing Code Enforcement/ Inspection process on a continual basis.

Task 2.11 Require appropriate post-construction BMPs on new development, as well as redevelopment projects.

As discussed in Task 2.12 below, include post-construction BMPs as part of the plan review and building permit process.

Task 2.12 Include SWPPP BMP needs in regular update of City Standard Specifications.

Whenever the City updates its design standards, post-construction BMPs will be included. This includes the design standards contained in Attachment 4 of the General Permit. Standards will be reviewed annually and updated as needed. (Refer to Attachment 4 in the General Permit.)

Task 3.14 Continue training for building inspectors and plan review engineers on SWPPP requirements and best management practices. Training will include Attachment 4 requirements and inspection and maintenance procedures.

This task can be combined with Task 3.13.

Task 4.13 Implement Storm Water ordinance enforcement provision, meeting minimum General Permit requirements, including design standards contained in Attachment 4, with a tiered level of enforcement. This provision utilized to deal with problem sites, where post-construction BMPs are not being utilized or maintained. To be done on a continual basis.

MUNICIPAL ACTIVITIES

The objective for the Municipal Activities Element is:

- To identify, develop and implement Best Management Practices and good housekeeping procedures, to address urban runoff pollution associated with municipal operations.

The City provides water, sewer, storm drain, streets, parks and recreation services. They also are the owner of a number of public works construction projects that have the potential to generate pollutants and sediment in runoff. The program is a progression of activities that educate City staff and then take positive action to eliminate the potential sources of storm water pollution from municipal activities.

Task 1.16 Conduct an annual inspection and assessment of municipal activities, such as the corporation yard, pipeline repair procedures, street pavement maintenance activities, parks, fertilizer and pesticide applications, etc. to prioritize the BMPs to be implemented within City operations
2.13,3.15,
4.14,5.14

The State BMP Handbooks and the Model Urban Runoff Program provide guidance on how a city should conduct an assessment of their physical plant for the potential to release pollutants to storm drainage. Potential sources such as material storage, vehicle maintenance, and field activities are included.

Tasks 1.17, Develop a training program regarding BMPs for municipal activities, such as
2.14,3.16, good housekeeping, landscape maintenance chemical use, containment of
4.15,5.15 industrial chemicals and fuels, sediment and erosion control. Staff to be trained include Public Works water, sewer, storm drain maintenance, Code Enforcement as good housekeeping, landscape maintenance chemical use, containment of industrial chemicals and fuels, sediment and erosion control. Staff to be trained include Public Works water, sewer, storm drain maintenance, Code Enforcement and applicable Building Department personnel, as well as road maintenance, fleet maintenance and parks maintenance personnel, annually.

Tasks 1.18, Participate in related regional regulatory activities that involve the water quality of the
2.15,3.17, San Joaquin River, to coordinate the City's SWMP with regional, multi-pollutant remed-
4.16,5.16 iation measures.

Participation may include the Storm Water Task Force, any TMDL committees, and the river groups that have a relationship to either the sources of pollution, or the health of the receiving streams.

Task 1.19 Obtain or update General Permit participation for any industrial activities conducted by the City

Certain municipal activities, such as the wastewater treatment plant, fleet maintenance, and airports are required to participate in the SWRCB General Storm water Permit for Industrial Activities, unless certain very limited exemptions exist. The City should review its compliance in the industrial permit requirements

Task 2.16 Conduct BMP training for field supervisors, construction inspectors and design engineers for the City's own construction projects.

This task can be combined with Task 2.17.

Task 2.17 Begin implementation of BMPs for municipal operations and capital improvement projects.

Task 2.18 Update the Standard Operating Procedure (SOP) for responding to chemical or sewer spills onto City streets and into storm drains.

The SOP should include first responder risk assessment methods, notification procedures, public access control, collaboration with public safety officials, cleanup protocols, incident closure, and outside resources such as hazardous materials cleanup contractors or mutual aid agreements. The type of spills to be covered should include raw sewage, hazardous materials, unknown materials and explosive materials.

Task 2.19 Develop an employee feedback system. Provide employees with suggestion forms that may be reviewed monthly.

Task 2.20 Review and revise BMPs for municipal activities with operational and construction staff input. Staff input to be collected through in house surveys and at training session round table discussions.

Task 3.19 Conduct follow-up training for City staff annually, or on an as-needed basis for specific topics related to municipal activities

Tasks 1.20 Assess street sweeping effectiveness annually.

2.20,3.20

4.17,5.17 Conduct targeted studies to optimize street sweeping effectiveness with existing equipment, comparing the frequency of sweeping or speed of sweepers for residential, commercial and industrial areas. All streets to be swept bi-weekly.

Tasks 4.18, 5.18, Research street-sweeping options, to improve sweeping effectiveness.

Evaluate available research in other cities regarding street sweeping methods and equipment, for possible improvements. To be done annually.

Task 5.19 Conduct pilot testing for metals in the oldest detention basins (2 total in City), to determine whether metals accumulation is occurring, and to assess the need for routine evaluations of storm basins.

Collect data on the construction date, maintenance activities and land use in the tributary area of 2 storm basins, to characterize the potential for heavy metals sources. Test the soil in each basin, using Standard EPA methods to determine the concentration of heavy metals sources. Compare the metals concentrations found to the standards for related metals limits, such as toxic pits and cumulative metals concentrations allowable in biosolids land application. Analyze the probable accumulation rate of metals in storm basins in the City to begin to assess whether Best Management Practices such as soil stripping or metals source controls are needed to prevent excess metals accumulation.



**Table IV.1
Summary of Pollution Prevention Work Plan**

Control Measure	Year 1	Year 2	Year 3	Year 4	Year 5
Public Education and Outreach	1.1 Develop or purchase bilingual ed. materials for general public information. Distribute.	2.1 Distribute educational materials to public, schools, events, library, & in City utility billing.	3.1 Distribute educational materials to public, schools, events, library, & in City utility billing.	4.1 Distribute educational materials to public, schools, events, library, & in City utility billing.	5.1 Distribute educational materials to public, schools, events, library, & in City utility billing.
	1.2 Distribute ed. materials @ pt. of sale & commercial outlets;25 first year.	2.2 Distribute ed. materials @ pt. of sale & commercial outlets ;25 more.	3.2 Distribute ed. materials @ pt. of sale & commercial outlets ;25 more	4.2 Distribute ed. materials @ pt. of sale & commercial outlets ;25 more	5.2 Distribute ed. materials @ pt. of sale & commercial outlets ;25 more
		2.3 Prepare & distribute educational materials to 20 or more restaurants & auto repair.shops re:BMPs.	3.3 Prepare & distribute educational materials to additional restaurants & auto repair shops re:BMPs	4.3 Prepare & distribute educational materials to additional restaurants & auto repair shops re:BMPs	5.3Prepare & distribute educational materials to additional restaurants & auto repair shops re:BMPs
				4.4 Assess additional public education needs.	5.4 Assess additional public education needs.
				3.4 Follow up education with restaurants and auto repair shops.	4.5 Educate additional business groups.
Public Participation and Involvement	1.3 Buy storm drain stencils or tiles.	2.4 Mark approx. 500 storm drains, using volunteers.	3.5 Mark approx. 500 more storm drains in the next section of the City.	4.6 Mark approx. 500 more storm drains in the next section of the City	5.6 Mark approx. 500 more storm drains in the next section of the City
		2.5 Conduct two annual community cleanup days with volunteers.	3.6 Conduct two annual community cleanup days with volunteers.	4.7 Conduct two annual community cleanup days with volunteers	5.7 Conduct two annual community cleanup days with volunteers
Illicit Discharge Detection and Elimination	1.4 Develop outline of illicit discharge detection and elimination program.				
	1.5 Conduct inspections of known illegal dump sites.	2.6 Conduct inspections of known illegal dump sites.	3.7 Conduct inspections of known illegal dump sites.	4.8 Conduct inspections of known illegal dump sites.	5.8 Conduct inspections of known illegal dump sites.
	1.6 Develop inspection check-lists; implement.				
	1.7 Annual pipeline inspection.	2.7 Annual pipeline inspection.	3.8 Annual pipeline inspection.	4.9 Annual pipeline inspection.	5.9 Annual pipeline inspection.
	1.8 Perform semi-annual Public Works employee training sessions.		3.9 Perform semi-annual Public Works employee training sessions.		5.10 Perform semi-annual Public Works employee training sessions.

Control Measure	Year 1	Year 2	Year 3	Year 4	Year 5
	1.9 Conduct pilot surveillance of target areas for illicit discharge. Revise.				
		2.8 Survey first quadrant.	3.10 Survey second quadrant.	4.10 Survey third quadrant.	5.11 Survey fourth quadrant.
		2.9 Eliminate illicit discharges with co-operation of property owners; City action, established continuous process.	3.11 Eliminate illicit discharges with co-operation of property owners; City action, established continuous process.	4.11 Eliminate illicit discharges with co-operation of property owners; City action, established continuous process.	5.12 Eliminate illicit discharges with co-operation of property owners; City action, established continuous process.
Construction Site Runoff Control	1.10 Educate local developers, construction firms and Building Dept. on BMP requirements.				
	1.11 Require SWPPPs for const. proj.-1acre or more & less than 1 acre if part oflgr.plan of developmt. or sale	2.10 Require SWPPPs for const. proj.-1acre or more & less than 1 acre if part oflgr.plan of developmt. or sale	3.12 Require SWPPPs for const. proj.-1acre or more & less than 1 acre if part oflgr.plan of developmt. or sale	4.12 Require SWPPPs for const. proj.-1acre or more & less than 1 acre if part oflgr.plan of developmt. or sale	5.13 Require SWPPPs for const. proj.-1acre or more & less than 1 acre if part oflgr.plan of developmt. or sale
	1.12 Pub.Wks & Bldg. Inspectors observe implementation of BMPs on permitted projects; ongoing process.		3.13 Continue training for building inspectors and plan review engineers on SWPPP reqmts.,BMPs.		
	1.13 City to modify storm/sewer ord. as needed to meet Regional Board. requirements.				
Post-Construction BMPs	1.14 Educate local developers and engineering firms about BMP requirements.	2.11 Require appropriate post-construction BMPs on new development & re-development proj.	3.14 Train building inspectors and plan review engineers on SWPPP requirements.	4.13 Implement SW Ordinance enforcement provisions to deal with problem sites.	
	1.15 Implement Long Term Maintenance and Monitoring Agreements for private BMPs.	2.12 Include SWPPP BMPs needs in regular update of City standard specifications.			
Municipal Activities - Good Housekeeping	1.16 Begin annual inspect./assesmt. of municipal activities; BMP training/supervisors, inspectors, eng.,etc. City projects.	2.13 Conduct annual inspect./assesmt. of municipal activities; BMP training/supervisors, inspectors, eng.,etc. City projects.	3.15 Conduct annual inspect./assesmt. of municipal activities; BMP training/supervisors, inspectors, eng.,etc. City projects	4.14 Conduct annual inspect./assesmt. of municipal activities; BMP training/supervisors, inspectors, eng.,etc. City projects	5.14 Conduct annual inspect./assesmt. of municipal activities; BMP training/supervisors, inspectors, eng.,etc. City projects
	1.17 Develop training program re: BMPs for City staff.	2.14 Conduct BMP training for City staff in BMPs.	3.16 Followup training with City staff in BMPs.	4.15 Followup training with City staff in BMPs.	5.15 Followup training with City staff in BMPs.
	1.18 Participate in related reg. regulatory activities re: water qual.,SJV river/City SWMP.	2.15 Participate in related reg. regulatory activities re: water qual.,SJV river/City SWMP.	3.17 Participate in related reg. regulatory activities re: water qual.,SJV river/City SWMP.	4.16 Participate in related reg. regulatory activities re: water qual.,SJV river/City SWMP.	5.16 Participate in related reg. regulatory activities re: water qual.,SJV river/City SWMP.

Control Measure	Year 1	Year 2	Year 3	Year 4	Year 5
	1.19 Verify & update industrial SW permits for WWTP, airport, or corporation yard.				
		2.16 Conduct BMP training for applicable personnel for City construction projects..			
		2.17 Begin implementation of BMPs for muni. Operations & capital impvmt.projects.	3.18 Conduct follow-up training for City staff.		
		2.18 Develop or revise SOP for street or storm drain spills.			
		2.19 Develop employee feedback system.	3.19 Conduct follow-up training for City staff.		
		2.20 Review and revise BMPs with staff input.			
	1.20 Assess street sweeping options annually.	2.21 Assess street sweeping options annually.	3.20 Assess street sweeping options annually.	4.17 Assess street sweeping options annually.	5.17 Assess street sweeping options annually.
	1.21 Research street sweeping options annually.	2.22 Research street sweeping options annually.	3.21 Research street sweeping options annually.	4.18 Research street sweeping options annually.	5.18 Research street sweeping options annually.
					5.19 Conduct pilot metals testing on storm water detention basins.

End of Table IV.



V. 5-Year Work Plan Budget

Table 4.1 estimates costs for the additional activities proposed to be included in the SWMP. These activities are in addition to current City services that have a beneficial impact on stormwater quality, such as system maintenance, street sweeping, and solid waste disposal.

This estimate provided costs per activity. Not all activities will occur in one year. Some activities will occur every year. The staff time is for each year that the activity occurs.

**Estimate of Costs and Staff Time
For Additional Storm Water Activities**

<u>Control Measure</u>	<u>Probable Material Cost in Year Activity Occurs</u>	<u>Staff Time per City</u>
Public Education and Outreach. Obtain and distribute public education brochures or novelties.	\$8000.00	80 hrs/year
Public Participation and Involvement: Purchase storm drain stencils or tile; organize volunteers.	\$3000.00	50 hrs/year
Illicit Discharge Detection and Elimination: Develop program and map - Conduct investigations, allowance for lab work - Correct discharges	\$2,000 to \$25,000 \$1,000 each occurrence \$0	40-80 hrs 100 hrs varies
Construction site runoff control: Educate local developers and construction companies -	\$500	40 hrs/workshop
Post-construction runoff control: Educate developers and local engineering firms -	\$500	40 hrs/workshop
Pollution Prevention/Good Housekeeping: Provide BMP training for staff- Conduct housekeeping assessment - Implement BMPs	\$500 \$0 varies	40 hrs/workshop 60 hrs varies
Permitting and Reporting Requirements: Annual report and fee to SWRCB – Permit Renewal in Year 5	\$5,000 \$10,000	40 hrs/yr
Total Program costs per City in Busiest year:	\$20,000 to \$50,000, depending on mapping and BMPs required	
Population: City Estimated Program Cost per Capita:	30,000 \$1.00 to \$2.50 /yr	

**Projected Five-Year Direct Cost Distribution,
Based on Planned Activities**

Control Measure	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5
Public Education & Outreach	\$8,000	\$5,000	\$5,000	\$5,000	\$5,000
Public Participation & Involvement	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000
Illicit Discharge Detection & Elimination	\$2,000- \$25,000	\$5,000	\$5,000	\$5,000	\$5,000
Construction Site Runoff Control		\$500			
Post-Construction Runoff Control		\$500			
Pollution Prevention/Housekeeping	\$500	varies	varies	varies	varies
Permitting and Reporting	\$3,000- \$5,000	\$3,000- \$5,000	\$3,000- \$5,000	\$3,000- \$5,000	\$10,000- \$15,000
Total:	\$20,000- \$50,000	\$20,000+	\$20,000+	\$20,000+	\$20,000- \$30,000+

VI. Performance Measurement and Reporting

The purpose of this section is to establish the methods by which the permittee will measure and report on their efforts to implement the Storm Water Management program. The cities' performance under the General Permit will be measured in two ways:

1. Storm Water Management Program activities completed as scheduled.
2. Tabulation of potential pollutants removed from the City's environment each year. These include measures such as the number of pounds of street sweepings collected each year, or the number of illicit discharges discovered and eliminated.

The performance measures are organized on the suggested worksheet shown in *Figure 1*, for routine use by field supervisors during the year.

In the event that the City is not able to comply with the General Permit, or with the planned activities of their Storm Water Management Program, the City shall notify the Central Valley Regional Water Quality Control Board (CVRWQCB) within 30 days. If an emergency condition exists that endangers human health or the environment, the City shall notify the CVRWQCB within 24 hours of becoming aware of the circumstances, and follow-up with a written report within 5 days.

By September 15th of each year, beginning in 2004, the Cities must submit an annual report to the Central Valley Regional Water Quality Control Board. The report shall include:

1. The status of compliance with permit conditions.
2. An assessment of the appropriateness and effectiveness of the identified BMPs.
3. Status of identified measurable goals,
4. Results of information collected and analyzed, including monitoring data, if any, during the reporting period;
5. A summary of the storm water activities the City plans to undertake during the next reporting cycle;
6. Any proposed changes to the SWMP along with a justification of why the changes are necessary, and
7. A change in the person or persons implementing and coordinating the SWMP.

Figure 2 is an annotated outline of the annual report to be submitted by the City.

The City will retain the records corresponding to the SWMP implementation for at least 5 years, or during the duration of the General Permit. Such records are public documents, accessible to the public in accordance with the Public Information Act.

Figure VI.1
Storm Water Management Program
Monthly Tabulation of Storm Water Quality Activities

City of Los Banos

Month/Year _____

Activity	Tally	Notes
Street Sweeping, tons or # of bins		
Garden Refuse Pickup, Tons		
Storm inlets marked		
Illicit discharges or illegal connections found and eliminated		
Corporation Yard cleanup activities		
Bulky Item Pickup Days & Estimated Tons Removed		
Catch Basins and Storm Drains Cleaned		
Public Education Contacts by Field Crews		

Figure VI.2

Storm Water Management Program **City of Los Banos**

Outline of Annual Report to CVRWQCB

I. Executive Summary

(This section should summarize the main challenges encountered and accomplishments achieved by the cities during the year.)

II. Control Measures Implemented

- i. Public Involvement and Outreach
- ii. Public Participation
- iii. Illicit Discharge/Illegal Connection Elimination
- iv. Construction BMPs
- v. Post-Construction BMPs
- vi. Municipal Operations

(This section should record the Tasks completed for each control measure. This discussion may include an assessment of the effectiveness of the various Tasks. Measurements of actual potential pollutants removed from the City's environment, such as tons of street sweepings or bulky items, should be tabulated. The section should also include a report of any enforcement actions taken. If the year's tasks included any monitoring, the monitoring data should be attached to the annual report.)

III. Funding Status

(This section should present the current and next year's budget for storm water quality activities for the City. This section may also include a discussion of the cost effectiveness of any of the control measure tasks.)

IV. Next Year's Work Plan

(This section should present the SWMP tasks to be accomplished during the coming year. This discussion can include the justification for any adaptive management changes in the planned work, based on the effectiveness or lack thereof of a previous year's task.)