



Coronado Unified School District

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STORM WATER MANAGEMENT PLAN

OEMC Job No. 03-247



March 2006

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DESCRIPTION

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**CORONADO UNIFIED SCHOOL DISTRICT
STORM WATER MANAGEMENT PLAN**

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**CORONADO UNIFIED SCHOOL DISTRICT
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GLOSSARY OF TERMS

authorized non-storm water discharges	Certain categories of discharges that are not composed entirely of storm water but are not found to pose a threat to water quality. They include: water line flushing; landscape irrigation; diverted stream flows; rising ground waters; uncontaminated ground water infiltration (as defined at 40 CFR § 35.2005(20)) to separate storm sewers; uncontaminated pumped ground water; discharges from potable water sources; foundation drains; air conditioning condensate; irrigation water; springs; water from crawl space pumps; footing drains; lawn watering; individual residential car washing; flows from riparian habitats and wetlands; dechlorinated swimming pool discharges; and discharges or flows from emergency fire fighting activities. If any of the above authorized non-storm water discharges (except flows from fire fighting activities) are found to cause or contribute to an exceedance of water quality standards or cause or threaten to cause a condition of nuisance or pollution, the category of discharge must be prohibited.
BMP	Best Management Practice. Schedule of activities, prohibition of practices, maintenance procedure, and other management practice to prevent or reduce storm water pollution. BMPs may include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.
BMP, Source Control	Any BMP that aims to prevent or reduce storm water pollution by reducing the potential for contamination at the source of pollution.
BMP, Structural	Any structural facility designed and constructed to mitigate the adverse impacts of storm water and urban runoff pollution (e.g. canopy, structural enclosure). The category may include both Treatment Control BMPs and Source Control BMPs.
BMP, Treatment Control	Any engineered system designed to remove pollutants by simple gravity settling of particulate pollutants, filtration, biological uptake, media adsorption or any other physical, biological, or chemical process.
C	Centigrade
CFR	Code of Federal Regulations
City	The City of Coronado that has jurisdiction over the MS4 that receives urban runoff from District facilities
County	San Diego County
CWA	Federal Clean Water Act (also known as Federal Water Pollution Control Act)
DCIA	Directly connected impervious area. The area covered by a building, impermeable pavement, and/or other impervious surfaces, which drains directly into the storm drain without first flowing across permeable land area (e.g., lawns).
District	Coronado Unified School District
EPA	United States Environmental Protection Agency

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GLOSSARY OF TERMS

F	Fahrenheit
General Construction Permit	Water Quality Order No. 99-08-DWQ NPDES General Permit No. CAS000002 Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction Activity, adopted on August 19, 1999 and modified on December 2, 2002.
General Industrial Permit	Water Quality Order No. 97-03-DWQ NPDES General Permit No. CAS000001 Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities.
General Small MS4 Permit	Water Quality Order No. 2003-01005-DWQ NPDES General Permit No. CAS000004 Waste Discharge Requirements from Small Municipal Separate Storm Sewer Systems, which was adopted on April 30, 2003.
illicit non-storm water discharge	Any discharge to the Small MS4 that is not composed entirely of storm water except discharges pursuant to a separate NPDES permit and authorized non-storm water discharges.
Integrated Pest Management (IPM)	As defined by the Healthy Schools Act of 2000, IPM is a "pest management strategy that focuses on long-term prevention or suppression of pest problems through a combination of techniques such as monitoring for pest presence and establishing treatment threshold levels, using non-chemical practices to make the habitat less conducive to pest development, improving sanitation, and using mechanical and physical controls. Pesticides that pose the least possible hazard and are effective in a manner that minimizes risks to people, property, and the environment are used only after careful monitoring indicates they are needed according to pre-established guidelines and treatment thresholds."
JPA	Joint Powers Agreement
local storm water agency	Local agency (e.g., San Diego County or local city) that receives storm runoff from District facility.
MEP	Maximum Extent Practicable. The technology-based standard for reducing pollutants in storm water that Small MS4 operators must meet. MEP is generally the result of emphasizing pollution prevention and source control BMPs as the first line of defense in combination with structural and treatment control BMPs, where appropriate, to provide additional lines of defense.
mg/L	milligrams per liter
Minimum Control Measure	A storm water program area that must be addressed by all regulated Small MS4s. The six minimum control measures are addressed in Sections 3 through 6.

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MS4	Municipal separate storm sewer system. Conveyance system or system of conveyances (including roads, culverts and other drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels or storm drains).
MS4, small	A MS4 that is not permitted under the federal Phase I storm water regulations, which is owned or operated by the United States, a state, city, county, district, or other public body. Small MS4s include storm sewer systems at school, college and university campuses. Small MS4s do not include separate storm sewer systems in very discrete areas, such as individual buildings.
MS4, small non-traditional	A MS4 that is operated at a separate campus or institution (e.g., school site, hospital or prison).
MS4, small regulated	A Small MS4 that discharges to a water of the United States or another MS4 regulated by an NPDES permit.
MS4, small traditional	A MS4 that is operated throughout a community (e.g., city or county).
new development	Land disturbing activities; structural development, including construction or installation of a building or structure, creation of impervious surfaces; and land subdivision.
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&G	oil and grease
O&M	operations and maintenance
Outdoor Material Storage Areas	Outdoor material storage areas refer to storage areas or storage facilities solely for the storage of materials. Improper storage of materials outdoors may provide an opportunity for toxic compounds, oil and grease, heavy metals, nutrients, suspended solids, and other pollutants to enter the storm water conveyance system.
outfall	A point where a MS4 discharges to waters of the United States and does not include open conveyances connecting two municipal storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other waters of the United States and are used to convey waters of the United States (40 CFR § 122.26(b)(9)).
point source	Any discernible, confined, and discrete conveyance, including, but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural storm water runoff (40 CFR § 122.2).

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pollutant	Any substance introduced into the environment that adversely affects the usefulness of a resource.
pollution prevention	Practices and actions that reduce or eliminate the generation of pollutants.
redevelopment	The creation or addition of at least 5,000 square feet of impervious area on an already developed site. Redevelopment includes, but is not limited to: the expansion of a building footprint or addition of a structure; structural development including an increase in gross floor area and/or exterior construction or remodeling; and land disturbing activities related with structural or impervious surfaces.
RWQCB	California Regional Water Quality Control Board, San Diego Region
SDCOE	San Diego County Office of Education
SIC	standard industrial classification
Small MS4 JPA	Joint Powers Agreement with the San Diego County Office of Education
Storm Event	A rainfall event that produces more than 0.1 inch of precipitation and that is separated from the previous storm event by at least 72 hours of dry weather.
SWMP	Storm Water Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
Trash Storage Areas	A trash storage area refers to an area where a trash receptacle or receptacles (dumpsters) are located for use as a repository for solid wastes. Loose trash and debris can be easily transported by the forces of water or wind into nearby storm drain inlets, channels, and/or creeks.
Treatment	The application of engineered systems that use physical, chemical, or biological processes to remove pollutants. Such processes include, but are not limited to, filtration, gravity settling, media adsorption, biodegradation, biological uptake, and chemical oxidation.
TSS	total suspended solids
U.S.	United States
U. S. EPA	United States Environmental Protection Agency
WDID	Waste Discharge Identification
WQS	water quality standards

SECTION 1

EXECUTIVE SUMMARY

1.1 INTRODUCTION

Coronado Unified School District (District) is located in Southern California. Urban runoff from District facilities is discharged to the Pacific Ocean and San Diego Bay.

The United States Environmental Protection Agency (U. S. EPA) has established the following two-phased program to address storm water discharges from municipal separate storm sewer systems (MS4s), industrial and construction activities:

- The Phase I regulations require that storm water management programs be developed and implemented by Large MS4s (serving populations of 100,000 people or more), certain industrial activities and construction activities disturbing five acres or more.
- The Phase II regulations require that storm water management programs be developed and implemented by Small MS4s (serving populations of less than 100,000) and construction activities disturbing one acre or more.

In California, the federal storm water regulations for Small MS4s are being implemented through Water Quality Order No. 2003-0005-DWQ National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004 Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Small MS4 Permit), which was adopted on April 30, 2003 by the State Water Resources Control Board (SWRCB). A copy of the General Small MS4 Permit is provided in Appendix F. The SWRCB has specifically identified school districts as owners and operators of Small MS4s.

The main goal of the General Small MS4 Permit is to protect water quality from urban runoff pollution. This is to be accomplished by addressing the various ways storm water quality can be impacted by school district activities. Compliance will require a coordinated effort by all staff (administration, facilities planning, teachers, and operation and maintenance).

In San Diego County, a number of school districts have entered into a Joint Powers Agreement with the San Diego County Office of Education (Small MS4 JPA) to coordinate the establishment, revision, direction and implementation of the storm water best management practices (BMPs) needed to comply with the General Small MS4 Permit.

1.2 REQUIREMENTS

The General Small MS4 Permit requires that each District:

- Submit a Notice of Intent to comply with the terms of the General Small MS4 Permit to the RWQCB within 180 days after being designated.
- Develop a Storm Water Management Plan (SWMP) that includes Best Management Practices (BMPs) that address the six minimum program areas identified below. The selected BMPs must reduce pollutants in storm water runoff to a technology-based standard of Maximum Extent Practicable (MEP) to protect water quality. The SWMP must also include measurable goals and timetables for implementation. The six minimum control measures are:
 - ✓ Public Education and Outreach on Storm Water Impacts
 - ✓ Public Involvement/Participation
 - ✓ Illicit Discharge Detection and Elimination

- ✓ Construction Site Storm Water Runoff Control
- ✓ Post-Construction Storm Water Management in New Development and Redevelopment
- ✓ Pollution Prevention/Good Housekeeping for Municipal Operations
- Conduct construction site inspections to verify that BMPs are in place and properly maintained.
- Conduct surveillance monitoring to confirm that illicit non-storm water discharges are detected and eliminated.
- Submit annual reports to the RWQCB describing progress in SWMP implementation.
- In addition, districts that serve populations over 50,000 or are subject to growth of at least 25 percent over ten years must comply with supplemental receiving water limitations and adopt specific design standards for future improvements.

1.3 BMP SUMMARY

The BMPs are summarized below and are listed in Table 1.1. The BMPs applicable to each minimum control measure (e.g., Public Education and Outreach) are addressed in greater detail in Sections 3 through 8.

Public Education and Outreach

- **BMP PE-1. Develop Educational Program.** Develop a plan for educating students, staff consultants and contractors, and members of the public that use school district facilities.
- **BMP PE-2. Educate Students.** Inform students using educational materials and assemblies.
- **BMP PE-3. Train Employees and Other Facility Users.** Train District employees (including maintenance and operations, administration and teachers) and other facility users (e.g., clubs, organizations, etc.) using educational materials and meetings.
- **BMP PE-4. Inform Consultants and Contractors.** Inform consultants and contractors, (including architects and engineers) using educational materials.

Public Involvement/Participation

- **BMP PI-1. Public Notice.** Provide notice, as required, regarding the public meeting at which the District Board will consider adoption of a resolution authorizing the Superintendent to implement and enforce the SWMP.
- **BMP PI-2. Storm Drain Marking Program.** Enlist volunteers and implement a phased program to add labels at drainage inlets (e.g. *Discharges to Creek*) to indicate that the inlets drain to the creek, bay, etc.
- **BMP PI-3. Local Watershed Input.** Identify organizations and individuals interested in the local watershed(s). Meet with representatives and conduct meetings at least annually to obtain input.
- **BMP PI-4. Community Activity.** Support activities that would allow students and staff to be involved in watershed improvement.

Illicit Discharge Detection and Elimination

- **BMP ID-1. Legal Authority.** Revise District policy, as needed, to prohibit illicit non-storm water discharges to the District MS4s.
- **BMP ID-2. Map Preparation.** Develop drainage system maps that show the location of all drainage inlets, conveyance facilities (e.g. pipes and open channels or ditches) and outfalls, and the waters of the United States or permitted MS4s that receive discharges from those outfalls.
- **BMP ID-3. Illicit Discharge Elimination.** Develop and implement a program that will lead to the detection and elimination of illicit non-storm water discharges to the District storm drainage system.

Construction Site Storm Water Runoff Control

- **BMP CS-1. Legal Authority.** Revise District policy, as needed, to require construction site operators to install and maintain adequate erosion and sediment controls to reduce pollutants in storm water runoff.
- **BMP CS-2. Construction Plan Review.** Modify existing District procedures, as needed, to assure construction plans and specifications are adequately reviewed to verify that erosion, sedimentation, and construction material and waste controls are adequate to reduce pollutants in storm water runoff.
- **BMP CS-3. Construction Site Inspection.** Modify existing District procedures, as needed, to assure that site conditions are adequately inspected by District staff to assure erosion, sediment, and construction material and waste controls are adequately in place and maintained in order to reduce pollutants in storm water runoff.
- **BMP CS-4. Construction Site - Public Inquiries/Complaints.** Develop District procedures for receipt, tracking and response to inquiries or complaints regarding construction site runoff.

Post-Construction Storm Water Management in New Development and Redevelopment

- **BMP PC-1. Legal Authority.** Revise District policy, as needed, to require that post-construction BMPs be considered during the planning and design process for new and remodeled school district improvements that involve the disturbance of one-acre or more.
- **BMP PC-2. Design Standards.** Develop District post construction facility design standards that are suitable and effective for preventing post-construction storm runoff pollution from District facilities.
- **BMP PC-3. BMP Inspection.** Inspect structural or treatment control BMP's to verify proper maintenance and operation.

Pollution Prevention/Good Housekeeping

- **BMP PP-1. Source Control – General.** Evaluate existing housekeeping, material storage, waste disposal, and equipment cleaning procedures. Develop and implement modifications necessary to prevent pollution.
- **BMP PP-2. Spill Prevention/Response.** Evaluate existing procedures. Develop and implement modifications necessary to address spill response at all District facilities.
- **BMP PP-3. Environmentally Preferable Products.** Develop and implement plan to minimize the use of products containing hazardous ingredients or toxic chemicals.

- **BMP PP-4. Bus Maintenance Facility.** Implement SWPPP for bus maintenance facilities.

1.4 BMPs APPLICABLE TO SPECIFIC DEPARTMENTS OR ACTIVITIES

In order to facilitate implementation, the BMPs that apply to specific school district departments (e.g., Facility Maintenance and Operations) or activities (special events) are also presented in the appendices:

- **Appendix A: Facility Planning BMPs.**
- **Appendix B: Maintenance and Operations BMPs**
- **Appendix C: Grounds Maintenance BMPs**
- **Appendix D: Teacher/Administration BMPs**
- **Appendix E: Special Event BMPs**

The intent of the appendices is to provide convenient handouts that describe the storm water BMP responsibilities for each group or activity.

Table 1.1. BMP Summary.

Minimum Control Measure	BMPs		SWMP Section
	No.	Description	
1. Public Education and Outreach on Storm Water Impacts	PE-1	Develop Educational Program	3
	PE-2	Educate Students	3
	PE-3	Train Employees and Other Facility Users	3
	PE-4	Inform Consultants and Contractors	3
2. Public Involvement/Participation	PI-1	Public Notice	4
	PI-2	Storm Drain Marking Program	4
	PI-3	Local Watershed Input	4
	PI-4	Community Activity	4
3. Illicit Discharge Detection and Elimination	ID-1	Legal Authority	5
	ID-2	Map Preparation	5
	ID-3	Illicit Discharge Elimination	5
4. Construction Site Storm Water Runoff Control	CS-1	Legal Authority	6
	CS-2	Construction Plan Review	6
	CS-3	Construction Site Inspection	6
	CS-4	Construction Site - Public Inquiries/ Complaints	6
5. Post-Construction Storm Water Management in New Development and Redevelopment	PC-1	Legal Authority	7
	PC-2	Design Standards	7
	PC-3	BMP Inspection	7
6. Pollution Prevention/ Good Housekeeping	PP-1	Source Control – General	8
	PP-2	Spill Prevention/Response	8
	PP-3	Environmentally Preferable Products	8

SECTION 2

INTRODUCTION

2.1 BACKGROUND

2.1.1 District Sites

The District is located approximately 4 miles west of San Diego and is within the jurisdiction of the California Regional Water Quality Control Board, San Diego Region (9) (RWQCB). The District serves elementary through high school students.

The District owns and operates storm drainage systems at 7 sites, situated within the City of Coronado and County of San Diego (County), California. The sites are listed below and are shown in Figure 2-1 (the numbers correspond to the site numbers on the figure):

1. District Office / Palm Academy
2. Coronado High School
3. Coronado Middle School
4. Coronado Village Elementary School
5. Silver Strand Elementary School
6. Crown Elementary
7. Coronado Royale Retirement Hotel (long-term land lease)

Potential sources of pollutants that could affect storm water runoff quality include:

- Facility maintenance activities (sediment, nutrients, metals, pesticides, bacteria [sanitary sewer overflows] and trash)
- Grounds maintenance activities (sediment, nutrients, herbicides, and trash)
- Vehicle and equipment maintenance activities (oil and grease and solvents)
- Outdoor eating areas (nutrients and trash)
- Outdoor material storage and parking areas (oil and grease, and metals)
- Swimming pool discharges (chlorine)

2.1.2 Affected Watersheds

All District facilities, except Silver Strand Elementary School, are tributary to the Pacific Ocean. Silver Strand Elementary School is tributary to San Diego Bay.

The Pacific Ocean shoreline near Coronado and the San Diego Bay shoreline near Silver Strand Elementary School are not included on the final list of water quality limited segments (California 2002 Section 303(d) List), which was approved by the U.S. EPA on July 25, 2003. The California 2002 Section 303(d) List identifies surface waters that do not meet water quality standards, even after point sources of pollution (e.g. discharges from wastewater treatment plants) have installed minimum required levels of pollution control.



- LEGEND**
- ① District Office/Palm Academy
 - ② Coronado High School
 - ③ Coronado Middle School
 - ④ Coronado Village Elementary School
 - ⑤ Silver Strand Elementary School
 - ⑥ Crown Elementary
 - ⑦ Coronado Royale Retirement Hotel

Figure 2-1 Coronado Unified School District

Filename: Coronado.dwg

2.1.3 District Growth

The District has not been subject to student and staff growth of at least 25 percent over ten years. Consequently, the District is not required to comply with the additional receiving water limitations or adopt the mandatory specific Design Standards specified in the General Small MS4 Permit.

2.1.4 Small MS4 JPA

It is anticipated that the District will be designated by the RWQCB as a non-traditional Small MS4 because it operates storm drainage systems at each of its campuses and other facilities. The District has entered into a Joint Powers Agreement with the San Diego County Office of Education (Small MS4 JPA) to coordinate the establishment, revision, direction, and implementation of the storm water pollution prevention measures needed to comply with the General Small MS4 Permit. Assistance to the District in preparation of this Storm Water Management Plan is provided through the Small MS4 JPA.

2.2 REGULATORY REQUIREMENTS

Section 402(p) of the Clean Water Act requires that the United States Environmental Protection Agency (U. S. EPA) establish a phased program to regulate storm water discharges from municipal separate storm sewer systems (MS4s) and industrial activities. A MS4 is a conveyance system or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) designed or used for collecting or conveying storm water.

The Phase I federal storm water regulations were promulgated on November 16, 1990. The Phase I regulations require that storm water permits be issued for Large MS4s (serving populations of 100,000 people or more), certain industrial activities and construction activities disturbing five acres or more.

The Phase II federal storm water regulations were promulgated on December 8, 1999. The Phase II regulations require that storm water permits be issued for Small MS4s (serving populations of less than 100,000) and construction activities disturbing one acre or more.

The California Regional Water Quality Control Board, San Diego Region (RWQCB) has adopted a Large MS4 permit that regulates discharges of urban runoff from MS4s owned and operated by San Diego County (County), the incorporated cities in the County and the San Diego Unified Port District (all co-permittees). The Large MS4 permit (which was adopted on February 21, 2001 and amended on November 15, 2001) requires that the County and cities implement urban runoff management programs. Implementation is underway.

The federal storm water regulations for Small MS4s, industrial activities and construction activities are being implemented in California through the following three statewide general permits adopted by the State Water Resources Control Board (SWRCB) and enforced by local California Regional Water Quality Control Boards:

- Water Quality Order No. 2003-01005-DWQ National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004 Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems, which was adopted on April 30, 2003 (General Small MS4 Permit). The General Small MS4 Permit is applicable to the operators of two types of MS4s that are not permitted under the federal Phase I storm water regulations:

- ✓ Traditional Small MS4s. Designated in Attachments 1 or 2 to the General Small MS4 Permit: MS4s serving small urbanized cities and counties and areas of special concern to the SWRCB or a California Regional Water Quality Control Board due to high population density, high growth potential, significant contributor of pollutants to an interconnected permitted city or county, or the discharge storm runoff to a sensitive water body.
- ✓ Non-traditional Small MS4s. Anticipated to be designated by a RWQCB: MS4s that serve public campuses (including schools and community colleges), military bases, prisons, and hospital complexes
- Water Quality Order No. 97-03-DWQ NPDES General Permit No. CAS000001 Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities (General Industrial Permit). The General Industrial Permit applies to certain identified industrial activities (e.g. school bus maintenance facilities). The SWRCB is currently considering adoption of a revised General Industrial Permit, and those revisions will continue to apply to Districts with school bus maintenance facilities.
- Water Quality Order No. 99-08-DWQ NPDES General Permit No. CAS000002 Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction Activity, which was adopted on August 19, 1999 and was modified on December 2, 2002 (General Construction Permit). The General Construction Permit applies to construction projects that result in land disturbance of one acre or more.

2.2.1 General Small MS4 Permit Requirements

The General Small MS4 Permit requires that school districts:

- Submit a Notice of Intent to comply with the terms of the Small MS4 General Permit to the RWQCB within 180 days after being designated.
- Develop a Storm Water Management Plan (SWMP) that includes Best Management Practices (BMPs) that address the following six minimum program areas. The selected BMPs must reduce pollutants in storm water runoff to a technology-based standard of Maximum Extent Practicable (MEP) to protect water quality. The SWMP must also include measurable goals and timetables for implementation. The six minimum control measures include:
 - ✓ Public Education and Outreach on Storm Water Impacts
 - ✓ Public Involvement/Participation
 - ✓ Illicit Discharge Detection and Elimination
 - ✓ Construction Site Storm Water Runoff Control
 - ✓ Post-Construction Storm Water Management in New Development and Redevelopment
 - ✓ Pollution Prevention/Good Housekeeping for Municipal Operations
- Conduct construction site inspections to verify effective BMPs are in place and maintained.
- Conduct surveillance monitoring to detect illicit non-storm water discharges.
- Submit annual reports to the RWQCB describing progress in SWMP implementation.

In addition, districts subject to growth of at least 25 percent over ten years or that serve combined student and staff populations over 50,000 must also:

- Comply with supplemental receiving water limitations that require that storm runoff discharges "... not cause exceedance of water quality standards contained in a Statewide Water Quality Control Plan, the California Toxics Rule (CTR), or in the applicable RWQCB Basin Plan."
- Adopt policies to "...ensure implementation specific Design Standards ..." for future improvements. The policy must be adopted within five years of designation as a regulated Small MS4.

2.3 PROGRAM BENEFITS

The benefits of the District's storm water management program include:

- Improved water quality in streams, lakes, rivers and the Pacific Ocean;
- Improved understanding for students and staff (and their families) regarding how storm water runoff quality can be affected by school district operations and activities; and
- Reduced discharges of pollutants, including sediment, nutrients, bacteria and viruses, oil and grease, metals, organics and pesticides into the local and regional storm drain systems and related surface waters.

SECTION 3

PUBLIC EDUCATION AND OUTREACH

3.1 REQUIREMENTS

In accordance with the General Small MS4 Permit, the District must: "...implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff."

3.2 DESCRIPTION

Public education and outreach is important for success of the storm water management program because it will allow the District to:

- Enlist cooperation from the local community;
- Increase public awareness regarding:
 - ✓ Storm water pollution;
 - ✓ The need for storm water management; and
 - ✓ Storm runoff impacts on local surface waters (i.e., rivers, creeks, bays, and/or the ocean).
- Help the public understand what they can do to reduce storm water pollution; and
- Ensure District employees understand and comply with the Small MS4 General Permit requirements.

In order to comply with the General Small MS4 Permit, the District must implement a program to inform the public about the storm runoff impacts on surface waters and enlist public support in SWMP implementation. The BMPs listed below include identification of suitable educational materials and methods, and educating students and training staff. The overall objective is to educate the students and staff regarding storm water issues and to obtain their cooperation.

3.3 BMPs

The four Public Education and Outreach BMPs are as follows:

- **BMP PE-1. Develop Educational Program.**
- **BMP PE-2. Educate Students.**
- **BMP PE-3. Train Employees and Facility Users.**
- **BMP PE-4. Inform Consultants and Contractors.**

The Public Education and Outreach BMPs are described in Table 3.1 along with:

- Measurable goals and dates for implementation.
- The person responsible for implementation.

In addition, the Public Education and Outreach BMPs that apply to specific District staff, classes or activities are also described in the appendices.

Table 3.1. Minimum Control Measure – Public Education and Outreach.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Program Development			
BMP PE-1. Develop Educational Program. Identify existing and develop new educational and training materials (e.g., brochures, checklists, inspection forms, etc.) that can be used to effectively educate students and facility users, train staff and inform consultants and contractors regarding storm water runoff controls. Identify target audiences. Develop strategy. Confer with San Diego County and/or other related storm water agencies and school districts in compiling existing resources and guidance materials. The educational and training materials shall address: <ul style="list-style-type: none">• Measures that can be taken to prevent storm water pollution; and• The need to eliminate illicit non-storm water discharges, and implement new construction plan review and construction inspection procedures, new design standards and source control requirements.• Consider use of school newspaper articles; special assemblies; distribution of storm water brochures and magnets; storm water displays; and/or use of the District web page to address urban runoff issues.	Identify educational materials and target audiences and develop education strategy.	6/30/07 (Complete)	Superintendent

Table 3.1. Minimum Control Measure – Public Education and Outreach.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Program Implementation			
BMP PE-2. Educate the Students. Use the educational materials developed in BMP PE-1. Subtasks include: <ul style="list-style-type: none">Distributing educational materials; andDiscussing storm water quality issues in classrooms and at assemblies.	Initiate student education program.	7/01/07 (Ongoing Program)	Superintendent
BMP PE-3. Train Employees and Facility Users. Use the educational materials developed in BMP PE-1. Target groups include Maintenance and Operations, Facility Planning, Facilities and Grounds staff administration and teachers, and other non-employee facility users (clubs, volunteer organizations, etc.). Subtasks include: <ul style="list-style-type: none">Distributing educational materials; andConducting training sessions.	Initiate employee training program.	7/01/07 (Ongoing Program)	Assistant Superintendent and Supervisor Maintenance and Operations
BMP PE-4. Inform Consultants and Contractors. Distribute educational materials developed in BMP PE-1. Subtasks include: <ul style="list-style-type: none">Distribute educational materials; andConduct workshops for consultants and contractors.	Initiate program to educate consultants and contractors.	7/01/07 (Ongoing Program)	Supervisor Maintenance and Operations

SECTION 4

PUBLIC INVOLVEMENT/PARTICIPATION

4.1 REQUIREMENTS

In accordance with the General Small MS4 Permit, the District must: "...at a minimum comply with State and local public notice requirements when implementing a public involvement/participation program."

4.2 DESCRIPTION

Public involvement/participation is important to obtain broader public support, incorporate public expertise, and take advantage of other related programs. The potential BMPs include public meetings, volunteer water quality monitoring, volunteer educators and speakers, storm drain stenciling, community clean-ups, incentive programs for students to participate on District facility litter cleanup days, and "adopt a storm drain" programs. In addition, the District could consider round table discussions by student, parent and/or teacher groups to identify additional BMPS for improving storm water runoff quality.

In order to comply with the General Small MS4 Permit, the District must implement a program to involve the public in SWMP implementation. The BMPs listed below include notifying the public regarding the District's plan for SWMP implementation, enlisting volunteers for the storm drain stenciling program, and reaching out to individuals, agencies and organizations interested in the local watershed. The overall objective is to involve the public in SWMP development and implementation.

4.3 BMPS

The four Public Involvement/Participation BMPs are as follows:

- **BMP PI-1. Public Notice.**
- **BMP PI-2. Storm Drain Marking Program.**
- **BMP PI-3. Local Watershed Input.**
- **BMP PI-4. Community Activity.**

The Public Involvement/Participation BMPs are described in Table 4.1 along with:

- Measurable Goals and dates for implementation.
- The person responsible for implementation.

In addition, the Public Involvement/Participation BMPs that apply to specific District staff, classes or activities are also described in the appendices.

Table 4.1. Minimum Control Measure – Public Involvement/Participation.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Notify Public			
BMP PI-1. Public Notice. Provide requisite notice regarding public meetings at which the District Board will consider adoption of a resolution directing the Superintendent to implement and enforce the SWMP.	Post requisite notice.	12/31/06 (Complete)	Superintendent
Involve Public			
BMP PI-2. Storm Drain Marking Program. Develop program. Enlist volunteers and implement program to label the District's storm drain inlets. Stencil or mark drain inlets in a phased program.	Enlist volunteers. Stencil or otherwise label 33% of the drainage inlets annually.	6/30/07 (33% Complete)	Supervisor Maintenance and Operations
		6/30/08 (66% Complete)	
		6/30/09 (100% Complete)	
BMP PI-3. Local Watershed Input. Identify organizations and individuals interested in the local watersheds and meet with representatives at least annually to obtain input.	Meet with watershed organizations and other interested parties, at least annually, to obtain input.	7/01/07 (Initiate Ongoing Program)	Supervisor Maintenance and Operations
BMP PI-4. Community Activity. <ul style="list-style-type: none">Support student and staff involvement in watershed improvement activities.Consider incentive programs for students or staff to develop site-specific BMPs that could be implemented to improve storm runoff quality (e.g. reduce litter).	Support creek or beach "clean up" days (if any).	7/01/07 (Initiate Ongoing Program)	Supervisor Maintenance and Operations

SECTION 5

ILLICIT DISCHARGE DETECTION AND ELIMINATION

5.1 REQUIREMENTS

In accordance with the General Small MS4 Storm Water Permit, the District must:

- 1) Develop, implement, and enforce a program to detect and eliminate illicit discharges (as defined at 40 CFR § 122.26(b) (2)) into the regulated Small MS4;
- 2) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and locations of all waters of the U. S. that receive discharges from those outfalls;
- 3) To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the MS4 and implement appropriate enforcement procedures and actions;
- 4) Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit;
- 5) Inform public employees, businesses, and the general public of the hazards that are generally associated with illegal discharges and improper disposal of waste..."

However, the General Small MS4 Storm Water Permit authorizes certain categories of non-storm water discharges ("authorized" non-storm water discharges, see paragraph 5.2) provided they are not identified by the RWQCB as significant contributors of pollutants to the Small MS4. If the RWQCB Executive Officer determines that any "authorized" non-storm water discharge(s) may be a significant source of pollutants to waters of the U. S., or pose a threat to water quality standards (beneficial uses), the Executive Officer may require the District to monitor, submit a report and implement BMPs.

5.2 DESCRIPTION

Illicit non-storm water discharges can significantly degrade surface water quality and threaten aquatic life, wildlife, and human health. They consist of discharges to the storm drainage system that are not composed entirely of storm water (excluding authorized non-storm water discharges). Illicit non-storm water discharges can include direct connections to the storm drainage system (e.g., cross-connections with a sanitary sewer system) and discharges that enter drainage inlets (e.g., wash water, paint residue and used oil).

In order to comply with the General Small MS4 Storm Water Permit, the District must develop, implement, and enforce a program to detect and eliminate illicit non-storm water discharges. The BMPs listed below include amendments to existing District policy, development of a map showing storm drainage patterns, facilities and outfalls at each of the Districts sites, periodic surveillance for non-storm water discharges during dry weather, and corrective actions to eliminate illicit discharges. The overall objective is to assure that illicit non-storm water is not discharged into the District MS4. However, certain categories of non-storm water discharges are "authorized" unless they are identified by the RWQCB as significant contributors of pollutants to the Small MS4. Accordingly, the District will allow the following "authorized" non-storm water discharges, which will be considered exempt from SWMP requirements:

1. water line flushing;
2. landscape irrigation;
3. diverted stream flows;

4. rising ground waters;
5. uncontaminated ground water infiltration (as defined at 40 CFR § 35.2005(20));
6. uncontaminated pumped ground water;
7. discharges from potable water sources;
8. foundation drains;
9. air conditioning condensation;
10. irrigation water;
11. springs;
12. water from crawl space pumps;
13. footing drains;
14. lawn watering;
15. individual residential car washing;
16. flows from riparian habitats and wetlands;
17. dechlorinated swimming pool discharges; and
18. flows from fire fighting activities.

5.3 BMPS

The three Illicit Discharge Detection and Elimination BMPs are as follows:

- **BMP ID-1. Legal Authority.**
- **BMP ID-2. Map Preparation.**
- **BMP ID-3. Illicit Discharge Elimination.**

The Illicit Discharge Detection and Elimination BMPs are described in Table 5.1 along with:

- Measurable goals and dates for implementation.
- The person responsible for implementation.

In addition, the Illicit Discharge Detection and Elimination BMPs that apply to specific District staff, classes or activities are also described in the appendices.

Table 5.1. Minimum Control Measure – Illicit Discharge Detection and Elimination.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Amend District Policy			
BMP ID-1. Legal Authority. Review existing District policy <ul style="list-style-type: none">Identify if any District policy must be revised or augmented to effectively prohibit illicit non-storm water discharges into the District MS4s.Adopt required policy and/or amendments, including amendments requiring the elimination of illicit discharges.	Review existing District policy.	12/31/06 (Complete)	Superintendent
	Adopt required policy and/or amendments to District policy.	6/30/07 (Complete)	
Locate Outfalls			
BMP ID-2. Map Preparation. Develop and implement plan for mapping of the District outfalls. <ul style="list-style-type: none">Show known outfalls and receiving streams based on existing records.Identify data gaps.Field locate existing outfalls.	Develop plan.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Map 33 percent complete.	6/30/07 (Complete)	
	Map 66 percent complete.	6/30/08 (Complete)	
	Map 100 percent complete.	6/30/09 (Complete)	

Table 5.1. Minimum Control Measure – Illicit Discharge Detection and Elimination.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Eliminate Non-Storm Water Discharges			
BMP ID-3. Illicit Discharge Elimination. <ul style="list-style-type: none">Develop and implement plan to detect and eliminate illicit non-storm water discharges (including custodial wash water disposal, washdown of outdoor eating areas, building washdown and vehicle/equipment washing) to District drainage systems and illegal dumping.Identify priority sites for inspection (e.g. sites where evidence of illicit discharges has been observed and sites where sewer system overflows or failures have occurred, or illicit discharges may result from facility or equipment washdown).Establish procedures for receiving reports regarding illicit discharges from the public.Evaluate alternative washwater disposal practices (e.g. use of custodial mop sinks).Evaluate the effectiveness of current measures taken to prevent and respond to spills (sewage, chemical, oil, etc). See BMP PP-2.Establish a system for tracking elimination of illicit discharges, including monitoring for sewage spills from on-site septic tanks (if any), and oil or chemical spills.Train District employees involved in the program annually. Develop inspection procedures/inspection checklists for inspectors. Utilize a tiered approach to training.	Develop plan.	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Implement plan.	7/01/07 (Initiate Ongoing Program)	

SECTION 6

CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

6.1 REQUIREMENTS

In accordance with the General Small MS4 Permit, the District must:

“...develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the Small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include the development and implementation of, at a minimum:

- 1) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions, or other effective mechanisms, to ensure compliance, to the extent allowable under State, or local law;
- 2) Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;
- 3) Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
- 4) Procedures for site plan review, which incorporate consideration of potential water quality impacts;
- 5) Procedures for receipt and consideration of information submitted by the public; and
- 6) Procedures for site inspection and enforcement of control measures.”

6.2 DESCRIPTION

Construction sites can be a significant source of polluted storm water runoff. Sediment is usually the primary pollutant of concern. However, storm water runoff can also be polluted by construction wastes (e.g. concrete truck washout, spilled petroleum products, paint, etc.).

In order to comply with the General Small MS4 Permit, the District must require and enforce effective construction site controls. The BMPs listed below include evaluation of, and revisions to, existing District policy (as needed to implement the SWMP), and evaluation of and revision to existing District procedures for review of construction plans, inspection of construction sites to verify BMPs are in place and effective and establishment of procedures for response to inquiries and complaints regarding construction site runoff. The overall objective of these BMPs is to assure that all land disturbance projects comply with the General Construction Permit.

6.3 BMPs

The four Construction Site Storm Water Runoff Control BMPs are as follows:

- **BMP CS-1. Legal Authority.**
- **BMP CS-2. Construction Plan Review.**
- **BMP CS-3. Construction Site Inspection.**
- **BMP CS-4. Construction Site - Public Inquiries/Complaints.**

The Construction Site Storm Water Runoff Control BMPs are described in Table 6.1 along with:

- Measurable goals and dates for implementation.
- The person responsible for implementation.

In addition, typical construction site BMPs are listed in Table 6.2 for consideration by the District. The Construction Site Storm Water Runoff Control BMPs that apply to specific District staff are also described in the appendices.

6.4 REFERENCES

The following references are available to assist with BMP selection:

1. California Stormwater Quality Association (CSQA), "Construction Handbook," dated January 2003. Available on-line at: <http://www.cabmphandbooks.com/>
2. CalTrans, "Construction Site Best Management Practices (BMPs) Manual," dated March 2003. Available on-line at: <http://www.dot.ca.gov/hq/construc/stormwater/manuals.html>
3. The City of San Diego, "Think Blue San Diego" website. Fact sheets available on-line at: www.thinkbluesd.org

Table 6.1. Minimum Control Measure – Construction Site Storm Water Runoff Control.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Amend District Policy			
BMP CS-1. Legal Authority. <ul style="list-style-type: none">Review relevant sections of District policy and construction contract and vendor requirements:<ul style="list-style-type: none">✓ Identify amendments needed to assure the District has adequate legal authority to:<ul style="list-style-type: none">Require the construction site controls necessary to reduce pollutants in storm water runoff, including implementation of effective erosion and sediment BMPs;Prohibit non-storm water discharges and requiring compliance with environmental regulations; andRequire post-construction BMPs be considered for all construction projects that disturb one acre or more.✓ Develop tiered approach for enforcement of violations of District policy regarding construction site controls (e.g., verbal warning, notice of violation with time schedule, Stop Work orders, etc.).✓ Adopt required amendments.Include adequate language in bid documents to require erosion and sediment control and construction waste management.	Identify necessary amendments to District policy.	12/31/06 (Complete)	Superintendent
	Revise District policy, as required.	6/30/07 (Complete)	

Table 6.1. Minimum Control Measure – Construction Site Storm Water Runoff Control.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Evaluate District Procedures			
BMP CS-2. Construction Plan Review. <ul style="list-style-type: none">• Increase awareness regarding the need for construction site storm water management.• Review existing procedures. Identify procedures that should be revised or augmented to assure construction plans include effective BMPs, Construction SWPPPs are prepared (where applicable), and that grading permit applicants provide proof of coverage under the California General Construction Permit (where applicable).• Identify effective construction site BMPs suitable for District.• Train District employees (see BMP PE-3) regarding revised plan review procedures.• Inform architects and contractors (see BMP PE-4) regarding the revised plan review procedures.	Increase public, contractor and District employee awareness of the construction storm water management program.	12/31/06 (Initiate Ongoing Program)	Supervisor Maintenance and Operations
	Develop revised District plan review procedures.	6/30/07 (Complete)	
	Revise District construction plan review procedures and requirements, and implement.	7/01/07 (Initiate Ongoing Program)	

Table 6.1. Minimum Control Measure – Construction Site Storm Water Runoff Control.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Evaluate District Procedures (Continued)			
BMP CS-3. Construction Site Inspection. <ul style="list-style-type: none">Review existing procedures. Identify procedures that should be revised or augmented to assure effective BMPs are both in-place and are maintained on construction sites in accordance with the approved construction plans and Construction SWPPPs (where applicable).Develop checklists for inspectors.Establish criteria for identification of priority sites (e.g. sites that are large or steep with substantial potential for erosion and sites located near storm drain inlets or surface waters).Develop plan to assure that construction sites greater than 1 acre are inspected twice during the dry season and that during the <u>wet</u> season:<ul style="list-style-type: none">✓ Priority sites are inspected weekly; and✓ Other sites are inspected every two weeks.Establish a system for tracking and correction of BMP deficiencies.Provide annual training for District employees (see BMP PE-3) and inform consultants and contractors (see BMP PE-4) regarding revised District site inspection procedures.	Review existing District site inspection procedures.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Revise District construction site inspection procedures as necessary.	6/30/07 (Complete)	
	Implement revised construction site inspection procedures.	7/1/07 (Initiate Ongoing Program)	
BMP CS-4. Construction Site - Public Inquiries/Complaints. <ul style="list-style-type: none">Develop District procedures for receipt, tracking, and response to public inquiries or complaints regarding construction site runoff.Train District employees (see BMP PE-3) regarding revised procedures.	Develop revised response procedures.	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Implement revised public response procedures.	7/1/07 (Initiate Ongoing Program)	

Table 6.2. Typical Construction Site BMPs.

Best Management Practices	Typical Construction Activities										Plant and Irrigate
	Demolish Pavement/ Structures	Clear and Grub	Construct Access Roads	Grading (including cut and fill slopes)	Excavate and Backfill	Prepare subgrade	Construct Bridges/ Culverts	Construct AC/ Concrete Paving	Construct Structures	Construct Retaining Walls	
Temporary Soil Stabilization											
Scheduling	x	x	x	x	x	x		x	x	x	x
Preservation of Existing Vegetation		x	x	x			x			x	
Hydraulic Mulch	x	x		x	x				x		x
Hydroseeding	x	x		x	x				x		x
Soil Binders	x	x		x	x						
Straw Mulch	x	x		x	x				x		x
Geotextiles, Mats/Plastic Covers and Erosion Control Blankets	x	x	x	x	x	x			x		x
Temporary Sediment Control											
Silt Fence	x	x	x	x	x	x			x		x
Fiber Rolls	x	x	x	x	x				x		x
Gravel Bag Berm	x	x	x	x	x				x		x
Check Dam	x	x		x	x						
Desilting Basin	x	x	x	x	x				x		x
Sediment Trap	x	x	x	x	x	x			x		x
Sediment Basin		x		x	x						x
Temporary Runoff Controls											
Earth Dikes/Drainage Swales and Lined Ditches		x	x	x					x		
Outlet Protection/ Velocity Dissipation Devices		x	x	x					x		

Table 6.2. Typical Construction Site BMPs.

Best Management Practices	Typical Construction Activities										Plant and Irrigate
	Demolish Pavement/ Structures	Clear and Grub	Construct Access Roads	Grading (including cut and fill slopes)	Excavate and Backfill	Prepare Subgrade	Construct Bridges/ Culverts	Construct AC/ Concrete Paving	Construct Structures	Construct Retaining Walls	
Slope Drains				x					x		
Temporary Stream Crossing			x		x		x		x		
Clear Water Diversion	x		x		x		x		x	x	
Wind Erosion Control		x	x	x	x	x		x			x
Sediment Tracking Control	x	x	x	x	x	x		x	x	x	x
Street Sweeping and Vacuuming	x	x	x	x	x	x		x	x	x	x
Stabilized Construction Roadway		x	x	x							
Entrance/Outlet Tire Wash		x	x	x							x
Waste and Material Management											
Stockpile management	x		x					x			
Spill Prevention and Control	x	x	x	x	x	x	x	x	x	x	x
Solid Waste Management	x	x	x	x	x	x	x	x	x	x	x
Hazardous Waste Management	x	x	x	x	x	x	x	x	x	x	x
Containment Soil Management	x	x		x			x				
Concrete Waste Management	x		x						x	x	x

Table 6.2. Typical Construction Site BMPs.

	Typical Construction Activities										
	Demolish Pavement/ Structures	Clear and Grub	Construct Access Roads	Grading (including cut and fill slopes)	Excavate and Backfill	Prepare Subgrade	Construct Bridges/ Culverts	Construct AC/ Concrete Paving	Construct Structures	Construct Retaining Walls	Plant and Irrigate
Sanitary/Septic Waste Management	x	x	x	x	x	x	x	x	x	x	x
Liquid Waste Management								x	x		
Vehicle and Equipment Management											
Vehicle and Equipment Management	x	x	x	x	x	x	x	x	x	x	x
Cleaning	x	x	x	x	x	x	x	x	x	x	x
Fueling	x	x	x	x	x	x	x	x	x	x	x
Maintenance	x	x	x	x	x	x	x	x	x	x	x
Non-Storm Water Management											
Water Conservation	x	x	x	x	x	x			x		x
Dewatering	x			x	x		x		x	x	x
Protect Existing Water Pipelines											

SECTION 7

POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

7.1 REQUIREMENTS

In accordance with the General Small MS4 Permit, the District must:

- "1) Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the Small MS4 by ensuring that controls are in place that would prevent or minimize water quality impacts;
- 2) Develop and implement strategies, which include a combination of structural and/or non-structural BMPs appropriate for your community;
- 3) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law; and
- 4) Ensure adequate long-term operation and maintenance of BMPs."

However, the General Small MS4 Permit does not require redesign of K-12 school or community college facilities that have been submitted to the Department of General Services, Division of the State Architect before adoption of the permit, and which receive final approval from the State Allocation Board or the Public Works Board, as appropriate, on or before December 31, 2004.

7.2 DESCRIPTION

Studies have indicated that prior planning and facility design is the most cost-effective approach to mitigating the storm water quality degradation that can result from new urban development and redevelopment. After construction is completed, storm runoff can be impacted by both a) the types of pollutants in storm runoff (e.g. sediment, oil and grease, nutrients, pesticides and heavy metals) and b) the increased quantity of runoff (e. g. resulting in downstream stream bank scouring and flooding).

In order to comply with the General Small MS4 Permit, the District must require post-construction storm runoff be addressed in the planning and design process, and provide for long-term operation and maintenance (O&M) to maintain the effectiveness of post-construction BMPs (e.g. detention basins). However, the General Small MS4 Permit does not require redesign of K-12 school or community college facilities that have been submitted to the Department of General Services, Division of the State Architect before adoption of the Permit on April 30, 2003, and which receive final approval from the State Allocation Board or the Public Works Board, as appropriate, on or before December 31, 2004.

The BMPs listed below include amendments to existing District policy, evaluation, and revision of existing District requirements for the design of new facilities, and verification that the District provides for O&M of post-construction BMPs. The overall objective is to assure that impacts to storm runoff are adequately considered when designing District facility improvements.

7.3 BMPs

The three Post-Construction Storm water Management in New Development and Redevelopment BMPs are as follows:

- **BMP PC-1. Legal Authority.**
- **BMP PC-2. Design Standards.**
- **BMP PC-3. BMP Inspection.**

The Post-Construction Storm Water Management in New Development and Redevelopment BMPs are described in Table 7.1 along with:

- Measurable goals and dates for implementation.
- The person responsible for implementation.

In addition, the Post-Construction Storm Water Management in New Development and Redevelopment BMPs that apply to specific District staff are also described in the appendices.

Table 7.1. Minimum Control Measure – Post-Construction Storm Water Management in New Development and Redevelopment.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Amend District Policy			
BMP PC-1. Legal Authority. Review existing District policy and identify amendments needed to assure the District has adequate legal authority to require that: <ul style="list-style-type: none">• Post-construction BMPs be considered for all construction projects that disturb one acre or more; and• Post-construction BMPs are adequately maintained (e.g., require long-term maintenance agreements).	Review existing District policy.	12/31/06 (Complete)	Superintendent
	Revise District policy as required.	6/30/07 (Complete)	
Develop Design Standards			
BMP PC-2. Design Standards. <ul style="list-style-type: none">• Review existing standards that are being implemented by the surrounding Phase 1 municipalities, identify requirements or standards that are appropriate for the District and should be added regarding post-construction BMPs for new development or redevelopment.• Develop a program to inspect the quality of storm water runoff after a major event in areas where post-construction runoff controls are utilized. Evaluate effectiveness of post-construction BMPs.• Train employees and designers (see BMP PE-4) regarding post-construction BMP design standards.	Review existing design standards. Identify suitable post-construction BMPs.	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Revise District design requirements as necessary to implement post-construction BMPs.	6/30/08 (Complete)	
	Implement revised design standards, train employees and inform designers.	7/01/08 (Initiate Ongoing Program)	
Evaluate District Procedures			
BMP PC-3. BMP Inspection. Conduct inspections to verify that public and privately owned post-construction controls (e.g. storm water detention basins, vegetated swales, etc.) are operating properly and adequately maintained. Evaluate post-construction effectiveness.	Implement program.	7/01/08 (Initiate Ongoing Program)	Supervisor Maintenance and Operations

SECTION 8

POLLUTION PREVENTION/GOOD HOUSEKEEPING

8.1 REQUIREMENTS

In accordance with the General Small MS4 Permit, the District must accomplish the following:

- "1) Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and
- 2) Using training materials that are available from U. S. EPA, the State, or other organizations, the program must include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet building maintenance, new construction and land disturbances, and storm water system maintenance."

8.2 DESCRIPTION

Pollution prevention/good housekeeping for municipal operations requires that the District examine municipal operations to identify source control measures that can be taken to mitigate storm runoff pollution. This control measure includes maintenance activities, maintenance and inspection schedules, inspection procedures, and material storage and disposal procedures.

In order to comply with the General Small MS4 Permit, the District must maintain work areas in a neat and clean condition and implement pollution prevention practices. The BMPs listed below include good housekeeping, and spill prevention and response. The overall objective is to prevent storm runoff pollution at District facilities through source control.

8.3 BMPs

The three Pollution Prevention/Good Housekeeping BMPs are as follows:

- **BMP PP-1. Pollution Prevention/Good Housekeeping – General.**
- **BMP PP-2. Spill Prevention/Response.**
- **BMP PP-3. Environmentally Preferable Products**

The Pollution Prevention/Good Housekeeping BMPs are described in Table 8.1 along with:

- Measurable goals and dates for implementation.
- Responsible person for implementation.

In addition, the Pollution Prevention/Good Housekeeping BMPs that apply to specific District staff, classes or activities are also described in the appendices.

Table 8.1. Minimum Control Measure – Pollution Prevention/Good Housekeeping.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Evaluate District Procedures			
BMP PP-1. Pollution Prevention/Good Housekeeping. Review existing District housekeeping, material storage, waste disposal, equipment and facility cleaning, and street and municipal parking lot sweeping procedures. Identify procedures that should be revised or augmented to assure reduction of pollutants in storm water to the maximum extent practicable. Train District employees (see BMP PE-3) regarding revised procedures. As a minimum, implement the following practices: • <u>General.</u> ✓ Clean outdoor work areas daily to prevent potential pollutants and debris from contact with storm runoff. Work areas shall not be hosed down, but vacuumed, swept or mopped; ✓ Place drip trays or pans beneath vehicles and equipment that are leaking while awaiting servicing or during servicing; ✓ Inspect work areas periodically to verify that facilities are clean and uncluttered and ✓ Continue implementing the IPM program. • <u>Material Storage.</u> Place materials (e.g. fertilizer, etc.) indoors, under a structural cover or tarp; and place materials that could leak or spill (oil, etc.) on or within secondary containment.	Review existing District procedures and activities.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Implement revised District procedures.	6/30/07 (Initiate Ongoing Program)	

Table 8.1. Minimum Control Measure – Pollution Prevention/Good Housekeeping.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Evaluate District Procedures (Continued)			
BMP PP-1. Pollution Prevention/Good Housekeeping (Continued). <ul style="list-style-type: none">• O&M. Clean out catch basins at least annually to remove accumulated debris and litter. Install screens or use other methods to prevent litter from entering catch basins at drainage inlets. Keep dumpster lids closed, and sweep up dumpster area regularly (do not hose down). Remove debris and trash from grates at drainage inlets before and after storm events and verify that waste materials and wash water (e.g., paintbrushes and rollers) are properly disposed of.• Erosion. Divert upstream runoff away from or across slopes (pipe, concrete chute) to prevent slope erosion and identify drainage areas subject to erosion. Determine source/cause. Evaluate feasible alternatives for reducing erosion.• Parking Lots. Identify drainage inlets and other points of concentration where runoff leaves parking lots. Monitor during storm events to identify priority locations based on drainage magnitude, parking lot use, and storm water appearance and evaluate treatment alternatives (e.g., diversion to vegetated swales, catch basin inserts, etc.).• Pool. Identify where pool drainage is discharged and confirm that pool discharges are adequately dechlorinated prior to discharge.• Feedback. Develop a procedure to obtain employee feedback regarding BMP effectiveness.	Review existing District procedures and activities.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Implement revised District procedures.	6/30/07 (Initiate Ongoing Program)	

Table 8.1. Minimum Control Measure – Pollution Prevention/Good Housekeeping.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
Pollutant Reduction			
BMP PP-2. Spill Prevention/Response. <ul style="list-style-type: none">Review existing District spill/leak prevention, response, and cleanup procedures, and equipment.Identify procedures that should be revised or augmented to assure reduction of pollutants in storm water to the maximum extent practicable.Provide additional equipment, if needed.Train District employees (see BMP PE-3) regarding revised procedures.	Review existing District spill/leak response and clean up procedures and equipment.	12/30/06	Supervisor Maintenance and Operations
	Develop and implement revised District procedures as necessary.	6/30/07 (Complete)	
BMP PP-3. Environmentally Preferable Products. Develop and implement a plan to minimize the use of products that contain hazardous ingredients or toxic chemicals for pest control, and facility, fleet maintenance, or grounds maintenance in favor of alternative environmentally preferable products that pose a lower risk to employees, the public and the environment.	Develop Plan	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Implement Plan	7/01/07 (Initiate Ongoing Program)	

SECTION 9

MONITORING AND REPORTING

9.1 MONITORING

In summary, the BMPs described in Sections 3 through 8 require that the District accomplish and document the completion of following monitoring:

9.1.1 Construction Site Inspections (BMP CS-3)

Inspect construction activities that result in land disturbance to verify that adequate BMPs are in place and are properly maintained.

9.1.2 Surveillance for Illicit Non-Storm Water Discharges (BMP ID-3)

Conduct periodic surveillance to detect and address illicit non-storm water discharges, including illegal dumping.

9.1.3 Structural or Treatment Control BMP Inspections (BMP PC-3)

Conduct periodic inspections (on at least an annual basis) to verify proper maintenance and operation of structural BMPs (e.g. containment structures) and treatment BMPs (e.g. sand/oil separators, absorbent pillows, etc).

9.2 REPORTING

9.2.1 Annual Reports

Following designation, the District must submit annual reports to the RWQCB on September 15 of each year. As stated in the General Small MS4 Permit, the reports must summarize the activities performed throughout the preceding reporting period (July 1 through June 30) and must include:

- a. The status of compliance with permit conditions;
- b. An assessment of the appropriateness and effectiveness of the identified BMPs;
- c. Status of progress towards meeting the identified measurable goals;
- d. Results of information collected and analyzed, including monitoring data, if any, during the reporting period;
- e. A summary of the storm water activities the District plans to undertake during the next reporting cycle;
- f. If there are any proposed change(s) to SWMP along with a justification of why the change(s) are necessary; and
- g. A change in the person or persons implementing and coordinating SWMP.

9.2.2 Noncompliance Reports

The District must notify the RWQCB within thirty days if it is unable to certify compliance with the SWMP or other General Small MS4 Permit requirements:

"Instances of noncompliance resulting in emergencies (i.e., that endanger human health or the environment) shall be reported orally to the RWQCB within 24 hours from the time the discharger becomes aware of the circumstance and in writing to the RWQCB within five days of the occurrence. The notification shall identify the noncompliance event and an initial assessment of any impact caused by the event, describe the actions necessary to achieve compliance, and include a time schedule indicating when compliance will be achieved. The time schedule and corrective measures are subject to modification by the RWQCB Executive Officer."

9.3 RECORDS

9.3.1 Record Retention

The District must keep records required by the Small MS4 Permit for at least five years or the duration of the General Permit (if the permit term is extended beyond five years). The RWQCB Executive Officer may specify a longer time for record retention.

9.3.2 Record Submittal

The District must submit records to the RWQCB Executive Officer upon request.

9.3.3 Record Availability

The District must make its records, including the Small MS4 Permit and SWMP, available to the public during regular business hours.

SECTION 10
CERTIFICATION

10.1 CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, 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 for knowing violations.

Date

Superintendent

APPENDIX A

FACILITY PLANNING BMPs

The District is implementing a Storm Water Management Plan (SWMP). The SWMP includes a number of best management practices (BMPs) to prevent storm water pollution. The below-listed BMPs are applicable to facility planning activities.

A.1 OBJECTIVE

Minimize storm water pollution.

A.2 BMPs

The Facility Planning BMPs are as follows:

- **BMP PE-1. Develop Educational Program.**
- **BMP PE-4. Inform Consultants and Contractors.**
- **BMP PI-1. Public Notice.**
- **BMP PI-3. Local Watershed Input.**
- **BMP PI-4. Community Activity.**
- **BMPs ID-1, CS-1 and PC-1. Legal Authority.**
- **BMP CS-2. Plan Review.**
- **BMP CS-3. Site Inspection.**
- **BMP CS-4. Public Inquiries/Complaints.**
- **BMP PC-2. Design Standards.**

The Facility Planning BMPs are described in Table A.1 along with:

- Measurable goals and dates for implementation.
- The person responsible for implementation.

Table A.1. Facility Planning BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
<p>BMP PE-1. Develop Educational Program. Identify existing and develop new educational and training materials (e.g., brochures, checklists, inspection forms, etc.) that can be used to effectively educate students and facility users, train staff and inform consultants and contractors regarding storm water runoff controls. Identify target audiences. Develop strategy for education and training.</p> <p>Confer with San Diego County and/or other related storm water agencies and school districts in compiling existing resources and guidance materials (i.e., checklists, inspection forms) that can be used to educate.</p> <p>The educational and training materials shall address:</p> <ul style="list-style-type: none"> • Measures that can be taken to prevent storm water pollution; and • The need to eliminate illicit non-storm water discharges, and implement new construction plan review and construction inspection procedures, new design standards and source control requirements. • Consider use of school newspaper articles; special assemblies; distribution of storm water brochures and magnets; storm water displays; and/or use of the District web page to address urban runoff issues. 	Identify educational materials and target audiences and develop education strategy.	6/30/07 (Complete)	Superintendent
<p>BMP PE-4. Inform Consultants and Contractors. Distribute educational materials. Subtasks include:</p> <ul style="list-style-type: none"> • Distribute educational materials; and • Conduct workshops for consultants and contractors. 	Initiate program to educate consultants and contractors.	7/01/07 (Ongoing Program)	Supervisor Maintenance and Operations

Table A.1. Facility Planning BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP PI-1. Public Notice. Provide requisite notice regarding public meetings at which the District Board will consider adoption of a resolution directing the Superintendent to implement and enforce the SWMP.	Post requisite notice	12/31/06 (Complete)	Superintendent
BMP PI-3. Local Watershed Input. Identify organizations and individuals interested in the local watersheds and meet with representatives at least annually to obtain input.	Meet with watershed organizations and other interested parties, at least annually, to obtain input.	7/01/07 (Initiate Ongoing Program)	Supervisor Maintenance and Operations
BMP PI-4. Community Activity. Support student and staff involvement in watershed improvement activities. Consider incentive programs to reduce litter.	Support creek or beach "clean up" days (if any).	7/01/07 (Initiate Ongoing Program)	Supervisor Maintenance and Operations
BMPs ID-1, CS-I and PC-I. Legal Authority. Review existing District policy <ul style="list-style-type: none"> Identify if any District policy must be revised or augmented to effectively prohibit illicit non-storm water discharges into the District MS4s; require adequate erosion and sediment controls during construction, and require that post – construction BMPs be considered during the planning and design process for new or remodeled improvements. Adopt required policy amendments. The amendments must include elimination of illicit non-storm water discharges. 	Review existing District policy.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Adopt required amendments to District policy.	6/30/07 (Complete)	

Table A.1. Facility Planning BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP CS-2. Construction Plan Review. <ul style="list-style-type: none"> • Increase awareness regarding the need for construction site storm water management. • Review existing procedures. Identify procedures that should be revised or augmented to assure construction plans include effective BMPs, Construction SWPPPs are prepared (where applicable), and that grading permit applicants provide proof of coverage under the California General Construction Permit (where applicable). • Train employees regarding revised plan review procedures. • Inform consultants and contractors regarding the revised plan review procedures. 	Increase consultant, contractor and District employee awareness of the construction storm water management program.	12/31/06 (Initiate Ongoing Program)	Supervisor Maintenance and Operations
	Develop revised District plan review procedures. Identify effective construction site BMPs suitable for District.	6/30/07 (complete)	
	Revise District construction plan review procedures and requirements as necessary.	7/01/07 (Initiate Ongoing Program)	

Table A.1. Facility Planning BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP CS-3. Construction Site Inspection. <ul style="list-style-type: none"> Review existing procedures. Identify procedures that should be revised or augmented to assure effective BMPs are both in-place and are maintained on construction sites in accordance with the approved construction plans and Construction SWPPPs (where applicable). Develop procedures for site inspection. Develop checklists for inspectors. Establish criteria for identification of priority sites (e.g. sites that are large or steep with substantial potential for erosion and sites located near storm drain inlets or surface waters). Develop plan to assure that construction sites greater than 1 acre are inspected twice during the dry season and that during the <u>wet</u> season: <ul style="list-style-type: none"> ✓ Priority sites are inspected weekly; and ✓ Other sites are inspected every two weeks. Establish a system for tracking and correction of BMP deficiencies. Provide annual training for District employees and inform consultants and contractors regarding revised District site inspection procedures. 	Review existing District site inspection procedures.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Revise District construction site inspection procedures as necessary.	6/30/07 (Complete)	
	Implement revised construction site inspection procedures.	7/1/07 (Initiate Ongoing Program)	
BMP CS-4. Construction Site - Public Inquiries/Complaints. <ul style="list-style-type: none"> Develop District procedures for receipt, tracking, and response to public inquiries or complaints regarding construction site runoff. Train District employees regarding revised procedures. 	Develop revised response procedures.	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Implement revised public response procedures.	7/1/07 (Initiate Ongoing Program)	

Table A.1. Facility Planning BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP PC-2. Design Standards. <ul style="list-style-type: none"> Review existing standards that are being implemented by the surrounding Phase 1 municipalities, identify requirements or standards that are appropriate for the District and should be added regarding post-construction BMPs for new development or redevelopment. Develop a program to inspect the quality of storm water runoff after a major event in areas where post-construction runoff controls are utilized. Evaluate effectiveness of post-construction BMPs. Train employees and designers (see BMP PE-4) regarding post-construction BMP design standards. 	Review existing design standards. Identify suitable post-construction BMPs.	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Revise District design requirements as necessary to implement post-construction BMPs.	6/30/08 (Complete)	
	Implement revised design standards, train employees and inform designers.	7/01/08 (Initiate Ongoing Program)	

APPENDIX B

MAINTENANCE AND OPERATIONS BMPs

The District is implementing a Storm Water Management Plan (SWMP). The SWMP includes a number of best management practices (BMPs) to prevent storm water pollution. The below-listed BMPs are applicable to maintenance and operations activities.

B.1 OBJECTIVE

Minimize storm water pollution.

B.2 BMPs

The Maintenance and Operations BMPs are as follows:

- **BMP PE-3. Train Employees and Facility Users.**
- **BMP PP-1. Pollution Prevention/Good Housekeeping.**
- **BMP PP-2. Spill Prevention/Response.**
- **BMP PP-3. Environmentally Preferable Products.**
- **BMP ID-2. Map Preparation.**
- **BMP ID-3. Illicit Discharge Elimination.**
- **BMP CS-3. Construction Site Inspection.**
- **BMP CS-4. Public Inquiries/Complaints.**
- **BMP PC-3. BMP Inspection.**

The Maintenance and Operations BMPs are described in Table B.1 along with:

- Measurable goals and dates for implementation.
- The person responsible for implementation.

Table B.1. Maintenance and Operations BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP PE-3. Train Employees and Facility Users. Provide annual training. Subtasks include: <ul style="list-style-type: none"> • Distributing educational materials; and • Conducting training sessions. 	Initiate training program.	7/01/07 (Ongoing Program)	Supervisor Maintenance and Operations
BMP PP-1. Pollution Prevention/Good Housekeeping. Review existing District housekeeping, material storage, waste disposal, equipment and facility cleaning, and street and municipal parking lot sweeping procedures. Identify procedures that should be revised or augmented to assure reduction of pollutants in storm water to the maximum extent practicable. Train District employees (see BMP PE-3) regarding revised procedures. As a minimum, implement the following practices: <ul style="list-style-type: none"> • General. <ul style="list-style-type: none"> ✓ Clean outdoor work areas daily to prevent potential pollutants and debris from contact with storm runoff. Work areas shall not be hosed down, but vacuumed, swept or mopped; ✓ Place drip trays or pans beneath vehicles and equipment that are leaking while awaiting servicing or during servicing; ✓ Inspect work areas periodically to verify that facilities are clean and uncluttered; and ✓ Continue implementing the IPM program. • Material Storage. Place materials (e.g. fertilizer, etc.) indoors, under a structural cover or tarp; and place materials that could leak or spill (oil, etc.) on or within secondary containment. 	Review existing District procedures and activities.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Implement revised District procedures.	6/30/07 (Initiate Ongoing Program)	

Table B.1. Maintenance and Operations BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP PP-1. Pollution Prevention/Good Housekeeping (Continued). <ul style="list-style-type: none"> • O&M. Clean out catch basins at least annually to remove accumulated debris and litter. Install screens or use other methods to prevent litter from entering catch basins at drainage inlets. Keep dumpster lids closed, never place liquid waste in dumpster and sweep up dumpster area regularly (do not hose down). Remove debris and trash from grates at drainage inlets before and after storm events and verify that waste materials and wash water (e.g., paintbrushes and rollers) are properly disposed of. • Erosion. Divert upstream runoff away from or across slopes (pipe, concrete chute) to prevent slope erosion and identify drainage areas subject to erosion. Determine source/cause. Evaluate feasible alternatives for reducing erosion. • Parking Lots. Identify drainage inlets and other points of concentration where runoff leaves parking lots. Monitor during storm events to identify priority locations based on drainage magnitude, parking lot use, and storm water appearance and evaluate treatment alternatives (e.g., diversion to vegetated swales, catch basin inserts, etc.) • Pool. Identify where pool drainage is discharged and confirm that pool discharges are adequately dechlorinated prior to entering the storm drain. • Feedback. Develop a procedure to obtain employee feedback regarding BMP effectiveness. 	Review existing District procedures and activities.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Implement revised District procedures.	6/30/07 (Initiate Ongoing Program)	

Table B-1. Maintenance and Operation BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP PP-2. Spill Prevention/Response. <ul style="list-style-type: none"> Review existing District spill/leak prevention, response, and cleanup procedures, and equipment. Identify procedures that should be revised or augmented to assure reduction of pollutants in storm water to the maximum extent practicable. Provide additional equipment, if needed. Train District employees regarding revised procedures. 	Review existing District spill/leak response and clean up procedures and equipment.	12/30/06	Supervisor Maintenance and Operations
	Develop and implement revised District procedures as necessary.	6/30/07 (Complete)	
BMP PP-3. Environmentally Preferable Products. Develop and implement a plan to minimize the use of products that contain hazardous ingredients or toxic chemicals for pest control, and facility, fleet maintenance, or grounds maintenance in favor of alternative environmentally preferable products that pose a lower risk to employees, the public and the environment.	Develop Plan	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Implement Plan	7/1/07 (Initiate Ongoing Program)	
BMP ID-2. Map Preparation. Develop and implement plan for mapping of the District outfalls. <ul style="list-style-type: none"> Show known outfalls and receiving streams based on existing records. Identify data gaps. Field locate existing outfalls. 	Develop plan.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Map 33 percent complete.	6/30/07 (Complete)	
	Map 66 percent complete.	6/30/08 (Complete)	
	Map 100 percent complete.	6/30/09 (Complete)	

Table B-1. Maintenance and Operation BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP ID-3. Illicit Discharge Elimination. <ul style="list-style-type: none"> Develop and implement plan to detect and eliminate illicit non-storm water discharges (including custodial wash water disposal, washdown of outdoor eating areas, building washdown and vehicle/equipment washing) to District drainage systems and illegal dumping. Identify priority sites for inspection (e.g. sites where evidence of illicit discharges has been observed and sites where sewer system overflows or failures have occurred, or illicit discharges may result from facility or equipment washdown). Establish procedures for receiving reports regarding illicit discharges from the public. Train District employees involved in the program annually. Develop inspection procedures/inspection checklists for inspectors. Utilize a tiered approach to training. Evaluate alternative washwater disposal practices (e.g. use of custodial mop sinks). Establish a system for tracking elimination of illicit discharges, including monitoring for sewage spills from on-site septic tanks (if any), and oil or chemical spills. 	Develop plan.	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Initiate program.	7/01/07 (Initiate Ongoing Program)	

Table B-1. Maintenance and Operation BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP CS-3. Construction Site Inspection. <ul style="list-style-type: none"> Review existing procedures. Identify procedures that should be revised or augmented to assure effective BMPs are both in-place and are maintained on construction sites in accordance with the approved construction plans and Construction SWPPPs (where applicable). Establish criteria for identification of priority sites (e.g. sites that are large or steep with substantial potential for erosion and sites located near storm drain inlets or surface waters). Develop procedures for site inspection, including checklists for inspectors. Develop plan to assure that construction sites greater than 1 acre are inspected twice during the dry season and that during the wet season: <ul style="list-style-type: none"> ✓ Priority sites are inspected weekly; and ✓ Other sites are inspected every two weeks. Establish a system for tracking and correction of BMP deficiencies. Provide training for District employees and facility users and inform consultants regarding revised District site inspection procedures. 	Review existing District site inspection procedures.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Revise District construction site inspection procedures as necessary.	6/30/07 (Complete)	
	Implement revised construction site inspection procedures.	7/1/07 (Initiate Ongoing Program)	

Table B-1 Maintenance and Operation BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP CS-4. Public Inquiries/Complaints. <ul style="list-style-type: none"> Develop District procedures for receipt, tracking, and response to public inquiries or complaints regarding construction site runoff. Train employees regarding revised procedures. 	Develop revised response procedures.	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Implement revised public response procedures.	7/1/07 (Initiate Ongoing Program)	
BMP PC-3. BMP Inspection. Conduct inspections to verify that public and privately owned post-construction controls (e.g. storm water detention basins, vegetated swales, etc.) are operating properly and adequately maintained. Evaluate post-construction effectiveness.	Implement program.	7/01/08 (Initiate Ongoing Program)	Supervisor Maintenance and Operations

APPENDIX C

GROUNDS MAINTENANCE BMPs

The District is implementing a Storm Water Management Plan (SWMP). The SWMP includes a number of best management practices (BMPs) to prevent storm water pollution. The below-listed BMPs are applicable to grounds maintenance activities.

C.1 OBJECTIVE

Minimize storm water pollution.

C.2 BMPs

The four Grounds Maintenance BMPs are as follows:

- **BMP PE-3. Train District Employees.**
- **BMP PP-1. Pollution Prevention/Good Housekeeping.**
- **BMP PP-3. Environmentally Preferable Products.**
- **BMP ID-3. Illicit Discharge Elimination.**

The Grounds Maintenance BMPs are described in Table C.1 along with:

- Measurable goals and dates for implementation.
- The person responsible for implementation.

Table C.1. Grounds Maintenance BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP PE-3. Train Employees. Provide annual training. Subtasks include: <ul style="list-style-type: none"> Distributing educational materials; and Conducting training sessions. 	Initiate employee training program.	7/01/07 (Ongoing Program)	Supervisor Maintenance and Operations
BMP PP-1. Pollution Prevention/Good Housekeeping. Review existing District housekeeping, material storage, waste disposal, equipment and facility cleaning, and street and municipal parking lot sweeping procedures. Identify procedures that should be revised or augmented to assure reduction of pollutants in storm water to the maximum extent practicable. Train District employees (see BMP PE-3) regarding revised procedures. As a minimum, implement the following practices: <ul style="list-style-type: none"> General. <ul style="list-style-type: none"> ✓ Clean outdoor work areas daily to prevent potential pollutants and debris from contact with storm runoff. Work areas shall not be hosed down, but vacuumed, swept or mopped; ✓ Place drip trays or pans beneath vehicles and equipment that are leaking while awaiting servicing or during servicing; ✓ Inspect work areas periodically to verify that facilities are clean and uncluttered; ✓ Consider measures that would reduce the generation of pollutants (e.g. integrated pest management); and ✓ Continue implementing the IPM program. 	Review existing District procedures and activities.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Revise District procedures.	6/30/07 (Initiate Ongoing Program)	

Table C.1. Grounds Maintenance BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP PP-1. Pollution Prevention/Good Housekeeping (Continued). <ul style="list-style-type: none"> • Material Storage. Store new and used materials indoors, under a structural cover or tarp. Store materials that could leak or spill (bags of fertilizer, etc.) indoors or within secondary containment. Place drip trays or pans beneath vehicles and equipment that are leaking while awaiting servicing or during servicing and keep dumpster lids closed, never dispose of liquid waste in dumpster, and sweep up dumpster area regularly (do not hose down). • Erosion. Identify drainage areas subject to erosion. Determine source/cause. Evaluate feasible alternatives for reducing erosion and divert upstream runoff away from or across slopes (pipe, concrete chute) to prevent slope erosion. • Feedback. Develop a procedure to obtain employee feedback regarding BMP effectiveness. 	Review existing District procedures and activities.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Revise District procedures.	6/30/07 (Initiate Ongoing Program)	
BMP PP-4. Environmentally Preferable Products. Develop and implement a plan to minimize the use of products that contain hazardous ingredients or toxic chemicals for pest control, and facility, fleet maintenance, or grounds maintenance in favor of alternative environmentally preferable products that pose a lower risk to employees, the public and the environment.	Develop plan.	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Implement Program.	7/01/07 (Initiate Ongoing Program)	

Table C.1. Grounds Maintenance BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP ID-3. Illicit Discharge Elimination. <ul style="list-style-type: none"> Develop and implement plan to detect and eliminate illicit non-storm water discharges (including custodial wash water disposal, washdown of outdoor eating areas, building washdown and vehicle/equipment washing) to District drainage systems and illegal dumping. Identify priority sites for inspection (e.g. sites where evidence of illicit discharges has been observed and sites where sewer system overflows or failures have occurred, or illicit discharges may result from facility or equipment washdown). Establish procedures for receiving reports regarding illicit discharges from the public. Train District employees involved in the program annually. Develop inspection procedures/inspection checklists for inspectors. Utilize a tiered approach to training. Evaluate alternative washwater disposal practices (e.g. use of custodial mop sinks). Establish a system for tracking elimination of illicit discharges, including monitoring for sewage spills from on-site septic tanks (if any), and oil or chemical spills. 	Develop plan.	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Initiate program.	7/01/07 (Initiate Ongoing Program)	

APPENDIX D

TEACHER/ADMINISTRATION BMPs

The District is implementing a Storm Water Management Plan (SWMP). The SWMP includes a number of best management practices (BMPs) to prevent storm water pollution. The below-listed BMPs are applicable to teacher/administration activities.

D.1 OBJECTIVE

Minimize storm water pollution.

D.2 BMPs

The five Teacher/Administration BMPs are as follows:

- **BMP PE-2. Educate Students.**
- **BMP PE-3. Train Employees.**
- **BMP PP-1. Pollution Prevention/Good Housekeeping.**
- **BMP PI-2. Storm Drain Marking Program.**
- **BMP ID-3. Illicit Discharge Elimination.**

The Teacher/Administration BMPs are described in Table D.1 along with:

- Measurable goals and dates for implementation.
- The person responsible for implementation.

Table D.1. Teacher/Administration BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP PE-2. Educate Students. Provide annual training. Subtasks include: <ul style="list-style-type: none"> Distributing educational materials; and Discussing storm water quality issues in classrooms and at assemblies. Consider use of school newspaper articles; special assemblies; distribution of storm water brochures and magnets; storm water displays; and/or use of the District web page to address urban runoff issues.	Initiate public education program.	7/01/07 (Ongoing Program)	Superintendent
BMP PE-3. Train Employees. Provide annual training. Subtasks include: <ul style="list-style-type: none"> Distributing educational materials; and Conducting training sessions. 	Initiate employee training program.	7/01/07 (Ongoing Program)	Assistant Superintendent and Supervisor Maintenance and Operations
BMP PP-1. Pollution Prevention/Good Housekeeping. <ul style="list-style-type: none"> Review existing housekeeping, material storage, waste disposal, equipment and facility cleaning procedures. Identify procedures that should be revised or augmented to assure reduction of pollutants in storm water to the maximum extent practicable. Develop a procedure to obtain employee feedback regarding BMP effectiveness. Train District employees regarding revised procedures. 	Review existing District procedures and activities.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Implement revised District procedures.	6/30/07 (Initiate Ongoing Program)	

Table D.1. Teacher/Administration BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP PI-2. Storm Drain Marking Program. Develop program. Enlist volunteers and implement program to label the District's storm drain inlets. Stencil or mark drain inlets in a phased program.	Enlist volunteers. Stencil or otherwise label 33% of the drainage inlets annually.	6/30/07 (33% Complete)	Supervisor Maintenance and Operations
		6/30/08 (66% Complete)	
		6/30/09 (100% Complete)	
BMP ID-3. Illicit Discharge Elimination. <ul style="list-style-type: none"> Develop and implement plan to detect and eliminate illicit non-storm water discharges (including custodial wash water disposal, washdown of outdoor eating areas, building washdown and vehicle/equipment washing) to District drainage systems and illegal dumping. Identify priority sites for inspection (e.g. sites where evidence of illicit discharges has been observed or illicit discharges may result from facility or equipment washdown). Establish procedures for receiving reports regarding illicit discharges from the public. Train District employees, at least annually, regarding the prohibition of illicit non-storm water discharges. Evaluate alternative wastewater disposal practices (e.g. use of custodial mop sinks). Establish a system for tracking elimination of illicit discharges, including monitoring for sewage spills from on-site septic tanks (if any), and oil or chemical spills. 	Develop plan.	6/30/07 (Complete)	Supervisor Maintenance and Operations
	Initiate program.	7/01/07 (Initiate Ongoing Program)	

APPENDIX E

SPECIAL EVENT BMPs

The District is implementing a Storm Water Management Plan (SWMP). The SWMP includes a number of best management practices (BMPs) to prevent storm water pollution. The below-listed BMPs are applicable to special event activities.

E.1 OBJECTIVE

Minimize storm water pollution.

E.2 BMPs

The three Special Event BMPs are as follows:

- **BMP PE-3. Educate Other Facility Users.**
- **BMP PP-1. Pollution Prevention/Good Housekeeping.**
- **BMP ID-3. Illicit Discharge Elimination.**

The Special Event BMPs are described in Table E.1 along with:

- Measurable goals and dates for implementation.
- The person responsible for implementation.

Table E.1. Special Event BMPs.

BMP	Measurable Goal		Responsible Individual
	Goal	Date	
BMP PE-3. Educate Other Facility Users. Inform facility users of the need to prevent storm water runoff pollution and prevent illicit non-storm water discharges. Target groups include clubs, volunteer organizations, etc. that use District facilities.	Implement program.	7/01/07 (Ongoing Program)	Supervisor Maintenance and Operations
BMP PP-1. Pollution Prevention/Good Housekeeping. <ul style="list-style-type: none"> Review existing housekeeping, material storage, waste disposal, equipment and facility cleaning procedures. Identify procedures that should be revised or augmented to assure reduction of pollutants in storm water to the maximum extent practicable. Develop a procedure to obtain feedback regarding BMP effectiveness. Educate facility users regarding revised requirements. 	Review existing special event procedures and activities.	12/31/06 (Complete)	Supervisor Maintenance and Operations
	Implement revised requirements.	6/30/07 (Initiate Ongoing Program)	
BMP ID-3. Illicit Discharge Elimination. <ul style="list-style-type: none"> Inform non- District employees, at least annually, of the need to prevent illicit discharges to the storm drain system. Conduct surveillances to verify the elimination of illicit discharges. 	Implement program.	7/01/07 (Initiate Ongoing Program)	Supervisor Maintenance and Operations

APPENDIX F

GENERAL SMALL MS4 PERMIT

A copy of the General Small MS4 Permit is included in this section.

OEMC

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