

**Memorandum**

To: Chris Adair, Senior Water Resources Civil Engineer  
Donette Dunaway, Engineering Geologist

Cc: Rob Russell, Deputy City Manager/City Engineer  
Vanessa W. Vallarta, City Attorney  
Carl Niizawa, Deputy City Engineer  
Denise Estrada, Maintenance Services Director  
Michael Ricker, Water Resources Planner  
Ron Cole, Wastewater Manager

From: Christopher A. Callihan, Sr. Deputy City Attorney

**Re: City of Salinas Stormwater Progress Report**

Date: May 24, 2007

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Pursuant to your request, provided below is a list of tasks completed and continuing to be worked on by the City of Salinas to meet the terms of its NPDES Permit. This should provide you sufficient information on our past and current progress to supplement the other information you intend to include in your Staff Report to the Regional Board for its July meeting.

**A. Stormwater Management Plan--SWMP**

1. A revised SWMP was submitted for Regional Board Staff consideration on January 20, 2007.
2. City Staff met with Regional Board Staff on two separate occasions—March 20, 2007 and April 27, 2007—to review and discuss comments on the revised SWMP.
3. Key City Staff—including Deputy City Manager/City Engineer, Deputy City Engineer, City Attorney, Sr. Deputy City Attorney, Maintenance Services Director, Water Resources Planner, and Wastewater Manager—meet regularly to coordinate preparation of SWMP and generally to review progress on compliance with NPDES Permit.
4. City Staff are completing a second revision to the SWMP based on Regional Board Staff's comments. Second revised SWMP to be submitted to Regional Board Staff on June 18, 2007.

**B. Public Education and Outreach**

1. City Staff are coordinating with local school administrators and directors to develop and implement an in-school education program.

- a. Coordinated with Director of Curriculum for Monterey County Office of Education and school administrators to develop an in-school educational program.
  - b. Establishing collaborative educational program with public and quasi-public stakeholder groups (Watershed Institute, MRWPCA, Water Awareness Committee, school districts, et al).
  - c. 720 students grades 3-6 attended a water resource theme, inter-active musical assembly.
  - d. Gave presentations on water resources to three 5<sup>th</sup> grade classes.
  - e. Hired an educational consultant to refine curriculum.
  - f. Developing watershed management map classroom display for distribution to local grades 3-6 classrooms.
2. Coordinate media outreach program with agency stakeholder groups.
    - a. On-going implementation of media outreach regarding urban watershed management.
      - i. Developing educational program with Monterey Bay Aquarium
      - ii. Prepared source reduction outreach information on plastics and trash in conjunction with partner stakeholders
      - iii. Developing decal for City street sweepers
3. Funded and facilitated creek clean up, student participation events, Natividad Creek, Natividad Creek Basin.
  4. Purchased IPM literature in large volumes for distribution at Pesticide Professional Applicators Association training activities throughout 2007.
  5. Our Water Our World (OWOW) Program Co-sponsor with Salinas Valley Solid Waste and Ecology Action Committee. Facilitated distribution of IPM fliers at nursery and hardware businesses:
    - Home Depot-July 07
    - Orchard Supply
    - Bokay Nursery
    - McShane's Nursery
  6. Participated in the Urban Pollution Prevention Advisory Committee Meeting, 4-10-07 as agency collaborative member.
  7. Co-sponsor for Green Gardener IPM program. Training landscape professionals and home gardeners.
  8. Newsletters sent to all Salinas households stating that the City now accepts plastic shopping bags curbside for recycling to reduce plastic litter pollutants (Winter 2007). Done as mailer with City franchise hauler, BFI. Also informed of event to dispose of tires for free on Nov. 13-18, and Jan. 8-13 at the Salinas Sun Street Disposal center. Fall 2006, Newsletter sent to all Salinas households announcing electronic waste

disposal program in Salinas at the SVSWA site, Sun Street Center. Reduces heavy metals and other pollutants through safe disposal procedures.

9. January 2007, Salinas jointed FOG Program. Performs grease public outreach campaign-\$15,000. Media outreach includes 5 newspapers for print media, Internet website, Internet ads, 3 radio stations.
10. Provided public information at Council meeting of Feb 6, 2007, Report-National Pollution Discharge Elimination System Program Update, 2007.
11. Half page ad in the Coast Weekly, Salinas Californian and Herald newspapers that state, *Volunteer to Help the Ocean. Stencil the message "No dumping flows to Bay" above storm drains on city streets around the Monterey Peninsula and the City of Salinas.* Message also solicits volunteer participation in stenciling program.
12. Salinas continues to participate in 3 R, Reduce, Reuse, Recycle program with Salinas Valley Solid Waste Authority to plan and implement outreach events throughout the year. This year's list includes Earth Day, Farm Day, and Make a Difference Day.
13. Salinas website now posting regional/local water related events as info is available: Example-Snapshot Day, 5-5-07, Public Workshop IPM, McShane's Nursery (OWOW Our Water, Our World Program-City Co-sponsor of program)

### C. Municipal Maintenance

#### 1. Education and Training.

- a. Conducted an orientation training re: urban watershed management to 15 new Maintenance Services Department staff.
- b. Staff attended a 2-day intensive IPM Training course-AAIE Ecological Pest Management Conference. Napa.
- c. Salinas Walk-N-Talk (Santa Rita Creek)-4-14-07-2 staff members 100% of Maintenance Services field staff were trained on general BMPs for their area of responsibility. Maintenance personnel were provided training on specific BMPs affecting their responsibilities.
- d. Staff attended a half-day training on commercial and industrial inspection program.
- e. Green Waste Recycling, Pollution Prevention meeting: 9-6-06, 10 staff members.
- f. Low Impact Development and Watershed Management webcast: 3-21-07 Maintenance Services and Development and Engineering staff attending.
- g. Water Quality Standards, Impaired Waters, TMDL issues. EPA webcast, 3-28-07. 3 staff attendees.
- h. Water Wise Landscape Symposium-Water Awareness Committee: 3-23-07. 6 staff attendees.

- i. Watershed Academy. Alternative Highway Stormwater Management Practices. Izaak Walton League: 12-6-06. Webcast. 13 staff attendees.
  - j. Construction SWPPPs from A-Z- Webcast EPA. 3 staff attendees.
  - k. NPDES Pollution Prevention Refresher Training: 11-17-06. All staff of Maintenance Services Department.
  - l. War on Weeds Symposium. IPM topic: 11-17-06, CSUMB- 1 supervisory staff attending.
  - m. Agriculture Water Quality Alliance-Pesticide Run Off Prevention Practices and Water Quality Management: 2-15-07. 13 pesticide application staff members in attendance.
  - n. Local Government Stormwater Management Innovations-1 Inspection Staff attending: 10-25-07.
  - o. NPDES BMP training. Video "Keep It Clean": 3-15-07. 14 Wastewater staff members attending.
  - p. 2007 Annual Pesticide Applicator Safety Training: 3-27-07. Includes NPDES training and SWMP review. 47 staff attendees.
2. Completed upgrade of City maps regarding storm inlets and outfalls. Information has been digitized to enable future GIS analysis.
  3. Facilitated citywide clean-up day with BFI (City franchise waste hauler) free dumping and recycling to residents-November 18, May 19, 2007 at three sites. Removed approximately 300 tons of garbage and potential pollutants from City. Circulated survey material on storm water knowledge at November 18<sup>th</sup> event.
  4. Agency Collaboration. Co-sponsored and participated in Monterey County "Clean-Up Day", April 21, 2007. Mobilized volunteers at ten sites for removing all forms of garbage from creeks, roadways, and other public sites. Collaborated with churches, neighborhood and service groups including: East Salinas Neighbors United, St. Ansgar's Church, Loving Salinas, Salinas Valley Community Church, Return of the Natives, Sacred Heart Church, Monterey County Environmental Health Dept.
  5. Funded Return of Natives program at Natividad Creek Basin and Chavez Park. March 31. Clean-up and native plantings for watershed area restoration. Flows to the Bay Earth Day Celebration and Share-A-Thon, Natividad Creek Park with CSUMB. Salinas Creeks-School Clean-up and Planting Days: January 19, February 2, 16,17, March 10, 20, 30, 31, April 20, 21. Involves K-12 students and teachers. Estimated attendance, 1500.
  6. Responded to reports of used oil, other pollutants left by roadside and reported to the Monterey County Clean website-3 locations.
  7. Installed "No Littering" signs along bike path areas near Natividad Creek Detention Basin 10-5-06. Replaced "No Dumping" signs at 4 locations.
  8. Facilitated volunteer clean-up activities with service clubs and churches. 11-06

9. Salinas Valley Solid Waste agency member. Free drop off of batteries, e-waste on specified days. Household hazardous waste facility continues to accept potentially polluting products free to residents.
10. All pesticide applications supervised by Certified Pesticide Applicators-Department of Pesticide Regulation. All pesticide applicators received training in safe application of pesticides, IPM, NPDES program goals.
11. All recyclable pesticide containers disposed of at the County recycled pesticide container events monthly.
12. Free e-waste recycling collection events: Salinas Sports Complex March 9-10, 2007, City parking Lot # 13, Oldtown, Wal-Mart, April 18, 2007
13. Performed large-scale clean-ups of Soledad Street, Chinatown Area two times in 2007. Removed trash, human waste, shopping carts, other pollutants.
14. Mid-Year Budget Hearings: 1-07. Council approved additional Street Sweeper Operator position and purchased new street sweeper to address pollutant removal from street inventory.
15. Storm Drain stenciling and student outreach program. All drains at Northridge Mall, Westridge (Wal-Mart) center, Old Town Salinas, select parks and school sites completed with collaboration with Save the Whales, Stormwater and Education Alliance, Weed Warriors: "No dumping flows to Bay". City staff continues to stencil hot spots as identified.
16. May 22, 2007. Council approved Capital Improvement Projects for Storm Sewer activities totaling \$1,086,800. Includes:
  - Storm Sewer Drainage Repairs: \$250,000
  - Street Sweeping Equipment Acquisition: \$86,800
  - Storm Water Monitoring: \$300,000
  - NPDES Public Education: \$150,000
17. May 22, 2007. Council approved NPDES Storm Drain Sewer Operation Budget: \$700,700. NPDES Street Sweeping Operations Budget: \$733,500.

**D. Commercial/Industrial**

1. On-going inspection of industrial sites for compliance with City BMPs.
2. Received authorization to hire new position for Industrial/Commercial Inspections. In progress of writing new job description.

3. Coordinated with commercial/industrial businesses to co-sponsor The Ammonia Safety Workshop. Salinas Community Center: 5-24-07. 650 attendees. One training module provided on BMPs for commercial/industrial facilities. Distributed BMP fliers, educational material.
4. Distributed "Storm Water Pollution Prevention Training" information to industrial facilities during annual inspection.

#### **E. Monitoring Program**

1. Pacific Ecorisk, the City's consultant and contractor for the City's annual monitoring program collected samples on April 22, 2007, for the Spring benthic and sediment toxicity assessments. The City is awaiting lab results and is on target to meet our annual monitoring requirements.

#### **F. Illicit Discharge**

1. Coordinated with Code Enforcement staff for resolution of illegal dumping issues and homeless encampment pollution concerns at three sites.
2. The City has incorporated a standard provision in its Conditional Use Permits a provision requiring the implementation and maintenance of BMPs and Low Impact Development (LID) features in all development projects requiring a CUP. Example: Davis Road Gateway District, 555 West Market Street.
3. The Wastewater Division of the City's Maintenance Services Department has responded to 43 reports of illicit discharges since January 07. Typically, responses have been to cleanups of concrete washdowns, paint spills, grease, oil, fuel, grass clippings, glass, tile cutting, dirt, rock salt, garbage, and grey water discharges. To date all responses have resulted in complete recovery of the spills or discharges. City employees were responsible for reporting 44% for the incidents reported. Most significantly, an off duty Wastewater staff member witnessed a fuel spill while driving by a local card lock gas station. Fuel was spilling out across the station's surface from under a commercial delivery panel truck. The filler hose to the gas tank was vandalized and the driver was un-attentive to the vehicle being fueled. The employee pulled into the station, shut the fuel off, got the drivers attention, would not allow the vehicle to be moved and alerted the Fire Department and Wastewater staff to respond to block the path of the spill and begin cleanup. Approximately 24 gallons of fuel entered the City storm system. The alertness of the employee allowed a quick response to block the flow approximately one block from the station. Arrangements were made to have NRC Environmental Emergency Response Team to respond from the Bay Area to accomplish the recovery and cleanup of the spill from the storm system. City staff closed portions of John Street and adjoining streets and provided support for the eleven hour-long response and cleanup overseen by Monterey County Environmental Health. A successful response due to employee training and awareness.

## **G. Low Impact Development Design and Implementation**

1. The City's Development and Engineering Section has been busy with working with development architects and engineers on low impact development design and implementation. City engineers have spent considerable time in providing guidance with development architects and engineers with this new concept and the development inspection group working closely with the City's engineers in ensuring that low impact concepts are realized in the field. Recent low impact development progress:
  - a. New Developments
    - i. Kohl's Department Store – Opened in April
  - b. And others currently in construction:
    - i. Home Depot
    - ii. Tony's Corner Shopping Development which includes:
      - (a) Babies are Us
      - (b) Circuit City
      - (c) Beverages & More
      - (d) Starbucks
      - (e) Chili's
  - c. Boronda Square – 7 acre Commercial-Retail
  - d. Tynan Village - 171 Low Income residential units plus commercial
2. Redevelopments:
  - a. Growers Ice – Industrial Maintenance Yard – completed in April
  - b. And others currently in construction:
    - i. Sherwood Senior Housing Complex –124 Units
    - ii. Breadbox - Park facility parking area.
    - iii. Mission Linen – Industrial facility parking lot
3. The City has developed a standard for LID feature maintenance agreement to ensure future maintenance and proper operation of BMPs and LID features installed on the required construction/development projects. The City is, for example, requiring McDonalds to enter into such an agreement for its restaurant reconstruction on North Main Street.
4. Low impact development training has been accomplished in three ways:
  - a. In-house training

- b. Literature review of existing standards from other jurisdictions including Contra Costa County.
5. Webcast training opportunities from such groups as American Public Works Association "Strategies for Effective Stormwater BMP Design and Maintenance" given April 12<sup>th</sup> and National Association of Local Government Environmental Professionals "Low Impact Development and Watershed Management" given March 12<sup>th</sup>.

#### **H. CCAMP 309 AXX Toxicity Reduction Evaluation – Update Summary of Activities**

1. **June 2006** – City staff followed up with a RWQCB notification of pollutants of concern found at 309 AXX CCAMP Airport Blvd. monitoring site.
2. **June 2006** – City Staff identified a potential source for a discharge and with the Contract Industrial Facility Source Control Inspector with the Monterey Regional Water Pollution Control Agency conducted a joint inspection of Mann Packing Co. Inc. Facility and issued a correction notice for a discharge of process water including broccoli stems to the storm system.
3. **June 2006** – Continued presence of broccoli at the 309 AXX site solicited a drive-by inspection by City Staff and MRWPCA Contract Industrial Inspector. Outside chillers noted draining to drains thought to be industrial drains. Dye test of flow confirmed discharge to storm drains.
4. **July 7, 2006** – Mann Packing issued Notice of Violation with direction to submit an NOI for enrollment into the Industrial General Stormwater Program and issued a correction notice for discharges from chillers and for broccoli in the waste stream. Mann complied with the requirements
5. **July 11, 2006** – Water quality samples taken at 309 AXX site.
6. **July 20, 2006** – City Staff advanced annual Industrial Stormwater Inspection for the Mann Packing Facility. Additional Flow was noted from 6 rooftop hydro-vac units.
7. **August 2006** - Mann Packing was granted permission to re-pipe the hydro-vac discharge to the City's industrial waste system. Mann complied prior to the noticed date of September 25, 2006.
8. **September 7, 2006** – Water quality sampling 309 AXX site. Ongoing assessment
9. **October 24, 2006** – Water quality sampling 309 AXX site. Ongoing assessment.
10. **October 24, 2006** – City staff conducted joint inspection of Mann Packing facility with CCRWQCB staff member Brandon Sanderson. A discharge of chlorinated water from a box washer to a facility storm drain was noted. Mann staff was instructed to abate the

discharge. Correction was made the same day as the discharge was redirected with piping to the City's industrial waste facility. All rear area drains were closed from the City's storm system and temporarily redirected to the City's industrial waste facility drains.

11. **October 25, 2006** – City staff met with Mann Packing facility manager to discuss a permanent solution to allow outside process discharges to the industrial waste facility. Discussed design plans for diversion sump.
12. **November 1, 2006** – Contracted Greenline Pipeline Services to televise approximately 3,600 ft (50%) of storm system pipe in the 309 AXX drainage area to gain better understanding of potential discharges to the storm system.
13. **November 2, 2006** – Met with Mann staff to review engineered plans for permanent diversion sump for process discharges to the industrial waste facility.
14. **November 3, 2006** – Contacted Erik Furtado of the Monterey County Environmental Health regarding potential wells in use in the 309 AXX drainage area that might be in use for potential sources of high nitrates. Mann packing uses a well for its production water. Due to stringent water quality requirement for the food processing industry water quality is tested weekly.
15. **November 28, 2006** – Mann Packing Co. submitted plans for a permanent diversion structure to the industrial waste drains to the City's Permit Center. City staff expedited through the permitting process.
16. **November 30, 2006** – City staff abated an illicit discharge from vehicle washing observed at MV Transportation at 1215 Hansen Street.
17. **November 30, 2006** - Ongoing water quality sampling at 5 locations within the TRE site. Site #1 (309 AXX outfall) shows acceptable levels (110) for Fecal Coliform (50) for E-coli
18. **December 21, 2006** – The City mailed an area wide notice to all businesses within the 309 AXX site with notification of the pollutants of concern for this drainage area, potential sources, the City's ongoing investigation, allowable discharge information and a request for implementation of BMPs.
19. **December 27, 2006** – Requested clarification from RWQCB staff regarding discharges from icing, vacuum tubes and condensers at industrial sites
20. **January 3, 2007** – Received clarification that discharges from icing, vacuum tubes and condensers should be treated or abated from discharge to the storm system.
21. **January 10, 2007** – Conducted smoke testing of the 309 AXX drainage area to identify various facility connections to the City storm system.

22. **January 10, 2007** – Verbal notification to Mann Packing regarding the need for correction of discharges from icing, vacuum tubes and condensers while in the winter slowdown season.
23. **January 11, 2007** – Conducted 2<sup>nd</sup> full day of smoke testing
24. **January 30-31, 2007** – Conducted site inspections of 41 businesses in the TRE drainage area for potential storage or use of pesticides or fertilizers or unauthorized storm water discharges. No breakthrough in the investigation but earlier notices, pipeline videoing, smoke testing and inspection presence has raised the level of awareness of the problem. Industry managers are interested in talking about the problem.
25. **January 31, 2007** – Conducted ongoing water quality sampling at 5 TRE sites.
26. **February 28, 2007** – Received faxed results of January 31 sampling event. Sites 2, 3, 4, and 5 show Non Detect for Diazinon and Chlorpyrifos. Site #1 (309 AXX outfall to Reclamation Ditch 1665) results show Non-Detect for Chlorpyrifos but indicates the presence of Diazinon. These findings eliminated upstream sites and lead the City's investigation to the nearest potential source for pesticides to the 309 AXX outfall. Western Farm Service, Inc., at 1129 Terven Avenue.
27. **March 1, 2007** – Notice mailed to 4 landscape companies and 3 pest control companies identified as providing services to businesses in the TRE drainage area. Notice similar to earlier business notice discussing the pollutants of concern, the City's investigation, illicit discharge detection, implementation of BMPs. Companies were identified from the January 30<sup>th</sup> and 31<sup>st</sup> business site inspections.
28. **March 2, 2007** – City Staff conducted a drive-by compliance inspection of the Mann Packing facility. Was accompanied by Facility Manager, Tom Mangino. The permanent diversion sump to the industrial waste facility was completed and received a final inspection from City inspectors just hours earlier. Total project cost by Mann Packing estimates approximately \$70,000. City Staff also inspected the sites near outdoor vacuum tubes, condensers, and potential discharge from cold room floor washdown. The nearby storm drains had been permanently plugged and diverted by sump or direct piping to a nearby industrial waste drain. Ice melt discharges from the icing room near Harkins Road had been blocked from the storm drain and diverted with a sump pump to the industrial waste drain. Mann Packing estimates that the additional diversions to the industrial drains cost approximately \$17,000. These diversions were noted to have occurred approximately in mid February. With completion of these permanent diversions Mann Packing achieved compliance abating non-storm water discharges from the Mann Facility.
29. **March 7, 2007** – City Staff conducted an unannounced site visit of the Western Farm Service facility to acquire a grab sample from the front parking lot storm drain.

30. **March 7, 2007** – Western Farms closed storm drain valves in their facility drains to abate potential discharge to the City storm system. Valves to remain closed.
31. **March 16, 2007** – Received verbal notification from BSK laboratory regarding high result for Diazinon at 25 ug/l from the Western Farm Service facility. Notified Western Farm Service the following week.
32. **March 21, 2007** - Conducted a joint site inspections with Cecile DeMartini (CCRWQCB) of the Mann Packing, Soil Serve, Cool Pacific and Western Farm Service facilities. With the exception of Soil Serve all are primary within the TRE drainage area. Cool Pacific maintains a Low Threat Discharge Permit from the CCRWQCB and has received a Notice of Violation for a TDS exceedence. City Staff discussed the potential for a diversion of discharge flows to the City's industrial waste facility with General Manager, Tom Hubbard.
33. **March 26, 2007** – Received letter dated 3-22-07 from Cool Pacific requesting permission to divert its low threat discharge to the City's industrial waste drains. Cool Pacific informed that the City will consider this option but has concerns regarding wet weather flows that may be captured to the industrial waste facility and concerns with exceedences as the industrial waste facility is operated under a Waste Discharge Permit from the CCRWQCB with its own water quality objectives. The City is interested in seeing upcoming water sampling results scheduled for the month of May.
34. **March 28, 2007** – Instructed BSK laboratory to conduct EPA 8141A pesticide panel on backup sample taken on March 7, at the Western Farms Site.
35. **April 4, 2007** – Sample results show high levels of Chlorpyrifos (3.8 ug/l) and Dimethoate (25 ug/l) from the Western Farm Service drain. A source for both pesticides (Diazinon and Chlorpyrifos) as pollutants of concern in the 309 AXX Toxicity Reduction Evaluation investigation has been identified and is currently contained on site.
36. **April 2007** – Western Farms contracts services with Walters Steam Company of Watsonville, CA to conduct water quality sampling from Western Farms facility drains and conduct comparative work on treating the site discharge water. Western Farms is considering recapturing water from internal drains to be treated and reapplied during pesticide applications to treated lands. Sample results show presence of pesticides DDD, Dysolfotate and Chlorpyrifos.
37. **May 2, 2007** – City staff is contacted by Walters Steam Company, as to the City's response. Western Farm Service was verbally notified that they will be receiving a Notice of Violation for the presence of pesticide following the March 7, grab sample and a requirement to enroll in the Industrial General Storm Water Program.
38. **May 16, 2007** – City Staff Spoke to Cecile DeMartini regarding the cancellation of WDR's for Western Farms and Cool Pacific and enrollment into the Industrial General Storm Water Program. Cecil provided standard enrollment language forwarded by David

Innis. The Regional Board will be copied on the letters to Western Farm Service and Cool Pacific.

**39. May 21, 2007** – City Staff met with Cool Pacific to discuss the City's permission to divert their CCRWQCB permitted low threat discharge to the City's Industrial Waste Drains. The meeting with General Manager, Tom Hubbard, found that Cool Pacific, encouraged by our earlier discussions, had moved ahead with the diversion to the industrial drains without formal approval. Two sumps are installed with diversion valves to the storm system. Cool Pacific will be required to divert wet weather flows to the storm system to minimize impacts to the industrial wastewater treatment facility. Mr. Hubbard was verbally informed that water from process or treated areas must be maintained on the property and not discharged with the storm water during wet weather. Cool Pacific will receive formal notification this week of these requirements with additional notification to enroll in the Industrial General Stormwater Program. As Cool Pacific did not wait for formal approval the diversion sumps were installed without approved plumbing or electrical design plans and proper permits. The sumps will require an inspection from the City's Permit Center inspectors and the low threat discharge may have to continue to the storm system if alterations are needed to bring the installation to City Code standards. This diversion serves to remove an additional discharge from the 309AXX outfall with potential contributions to pollutants of concern that are not covered under the sampling requirements of the current Low Threat Discharge Permit. There is an additional area of the facility that has not yet been diverted but the City will work with Cool Pacific to complete this project as quickly as possible. The Regional Board will be notified as soon as the project is completed. Cool Pacific estimated expenditures for the diversions at \$70,000.

**40. May 21, 2007** – Conducted water quality sampling at the 309 AXX stormwater outfall.

**41. May 23, 2007** – City Staff met with Cool Pacific to discuss the diversion of their permitted low threat discharge to the City's industrial waste facility and arrange a meeting with City inspectors to expedite completion of the diversion project.

Actions to be taken include issuing notices to Western Farm Service and Cool Pacific. Analysis of water samples taken May 21, 2007 to determine affects to water quality with actions taken to date. Continue to locate sources of non-stormwater discharges to 309 AXX and address with appropriate actions.

To date Mann Packing Company has reported expenditures for diversions to the industrial waste facility drains at approximately \$87,000. Cool Pacific reported expenditures at approximately \$40,000. The City has expended in excess of \$9,000 for water quality sampling for the TRE site and with only partial billing available the City has expended approximately \$15,000 for TRE development not inclusive of employee time.