



January 20, 2012

Bruce Wolfe
Executive Director
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

**SUBJECT: AMENDMENT TO CITY OF REDWOOD CITY MRP ANNUAL REPORT
SUBMITTAL- FOR FISCAL YEAR 2010 – 2011, PROVISIONS C.5 and C.6**

Reference: San Mateo Countywide Water Pollution Prevention Program

Dear Mr. Wolfe:

This is the City of Redwood City's response to the Water Board email request of December 19, 2011, for additional information the subject Provisions C.5.e.iii. (Collection System Screening, Reporting); C.5.f.iii.(4) (Tracking and Case Follow-Up/Summary of major types of discharges and complaints); C.6.e.iii.1.d.-g, h.-i. (Inspections/Reporting). Please see Attachment A for responses.

The City's response amending the annual report is submitted in accordance with the provisions C.16 of the MRP and certified accordingly.

C.5.e.iii.

The City's Annual Report states that it annually cleans the storm drain system (all 16 pump stations, all storm drain inlets and all catch basin) prior to the wet season. How many storm drain inlets and catch basins did the City clean during the reporting period? Also, as required in the MRP, please provide a discussion on any problems - illicit discharges - found during the reporting year during the City's Collection System Screening Program.

C.5.f.iii.(4)

Please provide a tally of all the complaints received for the reporting period.

C.6.e.iii.1.d.-g.

Please review the numbers reported in these sections because they do not mesh and/or the data is incomplete.

C.6.e.iii.1.h.-i.

Please also provide more discussion on the 2 violations not corrected within 30 days after the violations were discovered.

We 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 assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing the violations.

Sincerely,



Marilyn Harang, Interim Director
Public Works Services Department

E-Copy: Jolanta Uchman, SF Bay Water Board
Robert M. Bell, City Manager
Pamela Thompson, City Attorney
Bill Ekern, Community Development Director
Peter Vorametsanti, Acting Community Development Manager
Hilary Stevenson, Deputy City Attorney

ATTACHMENT A - AMENDMENT

PROVISION C.5

C.5.e.iii ► Evaluation of Collection System Screening Program	Additional Information
Provide a summary or attach a summary of your collection screening program, a summary of problems found during collection system screening and any changes to the screening program this FY.	
<p>Description:</p> <p>Redwood City’s storm drains system cleaning and inspection program typically would extend from April through mid-October, overlapping two fiscal years. The budget reductions in fiscal year 2010-11 and resulting personnel reduction require some adjustments to storm drain maintenance cleaning and inspection activities. On average, the city completes the cleaning and inspection of approximately 1,400 inlets, catch basins, and manholes per reporting period.</p> <p><u>In fiscal year 2010-11, the city completed the following:</u></p> <p>Total inlets, catch basins, siphon and manhole inspected and cleaned: 1,430 (debris/trash removed: 73 cy)</p> <p>Total linear feet of creeks, drainage ditches, culverts inspected and cleaned: 19,330 (debris removed: 292 cy)</p> <p>Total number of pump stations screened, cleaned and inspected: 8 (debris/ trash removed: 31 cy)</p>	

C.5.f.iii.(4) ► Summary of major types of discharges and complaints	Amended Additional Information
Provide a narrative or attach a table and/or graph.	
<p>During FY 2010-11, the city received no complaints for illicit discharges. However, during this period, the City reported four illicit discharges related to sewer system overflows (SSO) that reached the waters of the state (storm drain system), emergency response which included repair/clearing of blockage, recovery and cleanup was implemented, and an incident report submitted to the Water Board via CIWQS.</p> <p>The Public Works Services department maintains a database, “Public Works Service Request” log of all complaints and request for service. Additionally, in the after-hours, weekends & holidays, calls are received by the Police Department dispatch, which pages directly to the department’s on-call personnel. These calls are responded to immediately and the resolutions are added to the databases.</p>	

PROVISION C.6

C.6.e.iii.1.d ► Construction Activities Storm Water Violations	No change																								
	<table border="1"> <thead> <tr> <th align="center">BMP Category</th> <th align="center">Number of Violations¹</th> <th align="center">% of Total Violations²</th> </tr> </thead> <tbody> <tr> <td>Erosion Control</td> <td align="center">11</td> <td align="center">28</td> </tr> <tr> <td>Run-on and Run-off Control</td> <td align="center">6</td> <td align="center">15</td> </tr> <tr> <td>Sediment Control</td> <td align="center">11</td> <td align="center">28</td> </tr> <tr> <td>Active Treatment Systems</td> <td align="center">0</td> <td align="center">0</td> </tr> <tr> <td>Good Site Management</td> <td align="center">5</td> <td align="center">13</td> </tr> <tr> <td>Non Stormwater Management</td> <td align="center">6</td> <td align="center">16</td> </tr> <tr> <td>Total</td> <td align="center">39</td> <td align="center">100%</td> </tr> </tbody> </table>	BMP Category	Number of Violations ¹	% of Total Violations ²	Erosion Control	11	28	Run-on and Run-off Control	6	15	Sediment Control	11	28	Active Treatment Systems	0	0	Good Site Management	5	13	Non Stormwater Management	6	16	Total	39	100%
BMP Category	Number of Violations ¹	% of Total Violations ²																							
Erosion Control	11	28																							
Run-on and Run-off Control	6	15																							
Sediment Control	11	28																							
Active Treatment Systems	0	0																							
Good Site Management	5	13																							
Non Stormwater Management	6	16																							
Total	39	100%																							

C.6.e.iii.1.e ► Construction Related Storm Water Enforcement Actions

No change

	Enforcement Action (as listed in ERP) ¹	Number Enforcement Actions Taken	% Enforcement Actions Taken ²
Level 1	Verbal warning	9	90
Level 2	Written warning	1	10
Level 3			
Level 4			
Total		10	100%

C.6.e.iii.1.f, g ► Illicit Discharges

No change

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

C.6.e.iii.1.h, i ► Violation Correction Times

Amended Additional Information

	Number	Percent
Violations fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii.1.h)	8	80% ²
Violations not fully corrected within 30 days after violations are discovered (C.6.e.iii.1.i)	2	20% ³
Total number of violations for the reporting year¹	10	100%

The table titled, *Construction Site Inspections Tracking Spreadsheet*, (attached) has been amended to correct an error in calculation. The numbers didn't match due to double entry for the same violations. One example was on 10/1/10 the issue was identified and the enforcement response took place on 10/6/10. Another example was on 11/15/10 and the enforcement response took place on 12/6/10.

Comments:

The amended number of fully corrected violations is 8 or 80%. The 2 violations marked "were not corrected within 30 days" relate to the same construction site, 579 California Way, a residential property. Because the contractor and inspector were investigating alternative solutions to address V-ditch issues and general construction site controls, beginning on 10/11/10 and other subsequent inspection dates through 3/10/2011. However, it took several different solutions to resolve the problem (see chronology below):

- 10/11/10: Inspection of the V-ditch, condition good, but verbal to maintain V-ditch is free of debris
- 10/18/10: Inspection issued initial verbal warning to ensure V-ditch is free of debris
- 11/8/2010: Took corrective action, installed 1 1/2" - 3" rock to keep the soils stable. This was unsuccessful
- 11/15/10: Subsequently, enhanced the corrective action by installing larger rock and extending the installation of the rock further up the hill.
- 12/6/2010: Due to slope of the driveway, stabilized larger construction site entrance with larger rock
- 12/20/2010: During rains, additional waddles were required at the bottom of the driveway, and maintenance performed

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

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

- 1/5/2011: inspected existing waddles, issued verbal warning to replace waddles when they are waterlogged or been driven over by vehicles, keep V-ditch clean of debris
- 2/4/2011: inspected (see previous entries on spreadsheet for this address)
- 3/10/2011: All waddles in good shape, V ditches in good shape

The information provided above addressing this issue was gleaned from reports produced by the former construction site inspector, who retired from City employment. (Information provided by the City's Building & Inspection division of the Community Development Department.

Construction Site Inspections Tracking Spreadsheet

INSTRUCTIONS: Obtain data from the Inspection Checklist for Construction Stormwater Controls completed during inspection. Enter data from one inspection per row. Column 7 (Project disturbs one acre or more?) should be answered yes or no for **only the first inspection at any site**. For sites disturbing 1 acre or more, there should be at least 1 inspection per month from October 15 to April 15. Enforcement Response Level (Columns 20-24) should correspond with the Enforcement Response Plan. Enter "1" for yes. Leave blank for no or no problem.

PURPOSE: Municipal Regional Permit Provision C.6.e.ii(4) requires agencies to track and report on the information identified in this spreadsheet. The data recorded in this spreadsheet will be needed to summarize inspection results as required for annual reporting. The spreadsheet must be provided to Water Board staff if specifically requested. Submission of this spreadsheet with the Annual Report is not required but encouraged.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26
Enter 1 per inspection	Enter 1 for each site	Site Name (Ref 2) ¹	Inspectn Date (Ref 1)	Weather During Inspectn (Ref 1a)	Rain with Runoff Since Prev. Inspectn? Y/N (Ref 1b)	ANSWER ONCE PER SITE: Project Disturbs 1 acre or more? (Y/N/See Previous Entry) ² Ref 6	Problems Observed (Ref 9-15)						AMENDED 1/20/2012 Specific Problem(s) (Ref 9-15)	Resolution (Ref 17)			Comments (including rationales for longer compliance times) (Ref 16)	Enforcement Response (Ref 16)					Violation Corrected? (Ref 17)		
							Erosion Control	Sediment Control	Run-on & Runoff	Active Treatmt	Site Management	Non Stormwtr Mgt		Illicit Discharge	Problem Fixed	Needs more time		Escalate enforcement	Verbal warning	Written warning/ Notice of violation	Stop Work Order	Notice to comply	Legal action	Corrected within 10 business days	NOT corrected within 30 Days
1	1	Single Family Home, 3911 Pepper Tree Court	10/1/2010	Foggy/no rain	No	No	1	1			1			Installation of wattles need to be completed	1				1					1	
1		Single Family Home, 3911 Pepper Tree Court	10/6/2010	Light rain	No	See previous entry									1				Wattles in place						
1		Single Family Home, 3911 Pepper Tree Court	11/1/2010	Sunny	Yes	See previous entry													Site looks good						
1		Single Family Home, 3911 Pepper Tree Court	12/1/2010	Damp/foggy	Yes	See previous entry	1	1			1			Jute netting needs to be replaced near driveway	1				Neting has been replaced	1				1	
1		Single Family Home, 3911 Pepper Tree Court	12/6/2010	Light rain	Yes	See previous entry													Site looks good - Netting replaced						
1		Single Family Home, 3911 Pepper Tree Court	1/4/2011	Partly cloudy	Yes	See previous entry													Site looks good						
1		Single Family Home, 3911 Pepper Tree Court	2/1/2011	Sunny	Yes	See previous entry													Site looks good						
1		Single Family Home, 3911 Pepper Tree Court	3/1/2011	Partly cloudy	Yes	See previous entry	1	1			1			Need to secure tree protetion fencing and add more rock to site entrance					1					1	
1		Single Family Home, 3911 Pepper Tree Court	3/4/2011	Cloudy	Yes	See previous entry	1	1						Rock has been replaced, but fence needs to be replaced						1				1	
1		Single Family Home, 3911 Pepper Tree Court	3/11/2011	Sunny	Yes	See previous entry									1				Fence replaced						
1		Single Family Home, 3911 Pepper Tree Court	4/1/2011	Light rain/sunny	No	See previous entry													Site in good shape						
1	1	Residence Bechwati, 579 California Way	10/11/2010	Rain	Yes	No	1	1	1					Continue to maintain deep V ditch at bottom all run off going into drainage syste on site					1						1
1		Residence Bechwati, 579 California Way	10/18/2010	Overcast	Yes	See previous entry	1	1	1					Ensure V ditch is free of debris		1			1						1
1		Residence Bechwati, 579 California Way	11/8/2010	Clear	Yes	See previous entry	1	1	1				1	Owner added large 1 1/2 - 3" stone to keep soils stable deepend dikes kept and silt from off site out of V ditch	1				1					1	
1		Residence Bechwati, 579 California Way	11/15/2010	Overcast	Yes	See previous entry	1	1	1		1			Suggested that larger rock be installed and extended futher uphill - deepen earthen dikes		1			1						1
1		Residence Bechwati, 579 California Way	12/6/2010	Overcast	Yes	See previous entry	1	1					1	Due to slope of driveway water run off need stabilized larger construction stabilized entrance with larger rock	1										
1		Residence Bechwati, 579 California Way	12/20/2010	Rain	Yes	See previous entry	1	1	1		1			Additional waddles required at bottom of driveway - Also needs maintenance		1			Rain caused heaby volume of run off from St above	1					1
1		Residence Bechwati, 579 California Way	1/5/2011	Rain	Yes	See previous entry	1	1	1				1	Replace waddles when they are water logged or been driven by vehicle keep V ditch clean of debris	1				1						1

¹ The references (for example "Ref 12") refer to the applicable item number on the Construction Site Stormwater Inspection Checklist.

² Answer Yes or No only once for each site. 1=Yes, 0=No.

Construction Site Inspections Tracking Spreadsheet

1 Enter 1 per inspection	2 Enter 1 for each site	3 Site Name (Ref 2) ¹	4 Inspectn Date (Ref 1)	5 Weather During Inspectn (Ref 1a)	6 Rain with Runoff Since Prev. Inspectn? Y/N (Ref 1b)	7 ANSWER ONCE PER SITE: Project Disturbs 1 acre or more? (Y/N/See Previous Entry) ² Ref 6	8-14 Problems Observed (Ref 9-15)						15 AMENDED 1/20/2012 Specific Problem(s) (Ref 9-15)	16-18 Resolution (Ref 17)			19 Comments (including rationales for longer compliance times) (Ref 16)	20-24 Enforcement Response (Ref 16)					25-26 Violation Corrected? (Ref 17)					
							8 Erosion Control	9 Sediment Control	10 Run-on & Runoff	11 Active Treatmt	12 Site Management	13 Non Stormwtr Mgt		14 Illicit Discharge	16 Problem Fixed	17 Needs more time		18 Escalate enforcement	20 Verbal warning	21 Written warning/ Notice of violation	22 Stop Work Order	23 Notice to comply	24 Legal action	25 Corrected within 10 business days	26 NOT corrected within 30 Days			
1		Residence Bechwati, 579 California Way	2/4/2011	Clear	Yes	See previous entry						1																
1		Residence Bechwati, 579 California Way	3/10/2011	Clear	No	See previous entry						1																
1		Residence Bechwati, 579 California Way	4/7/2011	Overcast	Yes	See previous entry						1																

Total # Inspections	21
Total # Sites	2

No. of sites disturbing ≥ 1 acre: 0

No. of sites disturbing < 1 acre: 2

	Erosn Control	Sed Control	Runoff/Runon	Active Treatmt	Site Mgt	NonStormwtr	Illicit Dischg
No. of sites disturbing ≥ 1 acre:	11	11	6	0	5	0	6
No. of sites disturbing < 1 acre:							
Total problems:	39						
Percentage by BMP category	28%	28%	15%	0%	13%	0%	15%

Total sites with Problems Fixed 8

	Verbal warn.	Written warn.	Stop work	Notice comply	Legal action	Total corrected within 10 business days	Total NOT corrected within 30 days
Total enforcement actions	9	1	0	0	0	8	2
Percentage within enforcement category:	90%	10%	0%	0%	0%	100%	25%

¹ The references (for example "Ref 12") refer to the applicable item number on the Construction Site Stormwater Inspection Checklist.

² Answer Yes or No only once for each site. 1=Yes, 0=No.