



**Municipal Regional Permit
National Pollution Discharge Elimination System
City of East Palo Alto
ANNUAL REPORT 2014-2015**

ATTACHMENT B

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CITY OF EAST PALO ALTO
OFFICE OF THE CITY MANAGER
2415 University Avenue • East Palo Alto, CA 94303

September 15, 2015

Ms. Sue Ma
California regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street Suite 1400
Oakland, CA 94612

Subject: Annual Report Fiscal Year 2013-2014 for Municipal Regional Permit for National Pollutant Discharge Elimination System Permit Order R2-2009-0074 City of East Palo Alto

Dear Mrs. Ma,

The enclosed report contains City of East Palo Alto's Annual Report for consideration of compliance with our MRP requirements as set forth in the above referenced permit.

I certify under penalty of law that this document and all attachments (submitted electronically) were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based on my inquiry of person or persons who manage the system, or those persons directly responsible for gathering the information, the enclosed details are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

The City remains committed to full compliance with the Municipal Regional Permit and is actively working to prevent pollutants from entering our storm water system. If you have any questions about our Clean Bay Program, please contact Ms. Michelle Daher at (650) 853-3197 or via email at mdaher@cityofepa.org.

Sincerely,


Kamal Fallaha
Public Works and Transportation Director

Section 1 – Permittee Information

Background Information					
Permittee Name:	City of East Palo Alto				
Population:	31,000				
NPDES Permit No.:	CAS612008				
Order Number:	R2-2009-0074R				
Reporting Time Period (month/year):	July 2014 through June 2015				
Name of the Responsible Authority:	Kamal Fallaha	Title:	Public Works Director		
Mailing Address:	1960 Tate Street				
City:	East Palo Alto	Zip Code:	CA	County:	94025
Telephone Number:	650-853-3117	Fax Number:	650-853-3179		
E-mail Address:	kfallaha@cityofepa.org				
Name of the Designated Stormwater Management Program Contact (if different from above):	Michelle Daher	Title:	Management Analyst		
Department:	Community and Economic Development				
Mailing Address:	1960 Tate Street				
City:	East Palo Alto	Zip Code:	CA	County:	94025
Telephone Number:	650-853-3197	Fax Number:	650-853-3179		
E-mail Address:	mdaher@cityofepa.org				

Section 2 - Provision C.2 Reporting Municipal Operations

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Summary:

- 1) **The City has attended Countywide program Municipal Operations Committee meetings to improve street sweeping, stormdrain cleaning, management of non-stormwater materials and trash capture device maintenance.**
- 2) **The City continues to prevent pollution potential by implementing BMPs in maintenance practices .**

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

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

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

Comments:

The City has moved to a slurry seal of asphalt with direct application with equipment that includes multiple barrier protection against spills. **Applications are only applied during non-storm weather with minimal potential for pollutant impacts.**

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

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

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

Comments: **The City continues to utilize vacuum equipment for washwater and cleanup of non-stormwater materials.**

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

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

NA	Control of discharges from bridge and structural maintenance activities directly over water or into storm drains
NA	Control of discharges from graffiti removal activities
NA	Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities
NA	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs for graffiti removal
NA	Employee training on proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.
NA	Contract specifications requiring proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.

Comments: **The City does not maintain any bridges or structures directly over water or into stormdrains. Graffiti removal is conducted with direct application, away from stormdrain infrastructure, with spill management tools on-site.**

C.2.d. ► Stormwater Pump Stations

Does your municipality own stormwater pump stations: **Yes** **No**

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

Complete the following table for dry weather DO monitoring and inspection data for pump stations¹ (add more rows for additional pump stations). If a pump station is exempt from DO monitoring, explain why it is exempt.

Pump Station Name and Location	First inspection Dry Weather DO Data		Second inspection Dry Weather DO Data	
	Date	mg/L	Date	mg/L
O'Connor Pump Station	Sept. 2, 2014	5.6	Sept. 2, 2014	8.6
O'Connor Pump Station	June 23, 2015	6.8	June 23, 2015	8.0
O'Connor Pump Station	Sept. 8, 2015	6.5	Sept. 8, 2015	7.2

¹ DO monitoring is exempted where all discharge from a pump station remains in a stormwater collection system or infiltrates into a dry creek immediately downstream.

Summarize corrective actions as needed for DO monitoring at or below 3 mg/L. Attach inspection records of additional DO monitoring for corrective actions: **No action required; testing above 3 mg/L**

Summary: **The Pump Station continues to have acceptable DO range. However, the City is having sediment removed to increase capacity so that the pumps are more efficient and effective, and hopefully this will aid DO levels by allowing for improved flow/circulation.**

Attachments: **None attached; follow-up inspections were not required.**

Complete the following table for wet weather inspection data for pump stations (add more rows for additional pump stations):

Pump Station Name and Location	Date (2x/year required)	Presence of Trash (Cubic Yards)	Presence of Odor (Yes or No)	Presence of Color (Yes or No)	Presence of Turbidity (Yes or No)	Presence of Floating Hydrocarbons (Yes or No)
O'Connor Pump Station (0.08")	11/12/14	20	No	No	Yes	No
O'Connor Pump Station (0.12")	12/9/14	25	No	No	Yes	No
O'Connor Pump Station (0.12")	01/08/15	25	No	No	Yes	No
O'Connor Pump Station (0.12")	02/11/15	30	No	No	Yes	No

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

Does your municipality own/maintain rural² roads: Yes No

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

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

NA	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas
NA	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources
NA	No impact to creek functions including migratory fish passage during construction of roads and culverts
NA	Inspection of rural roads for structural integrity and prevention of impact on water quality

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

Permittee Name: **City of East Palo Alto**

NA	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts and excessive erosion
NA	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate
NA	Inclusion of measures to reduce erosion, provide fish passage, and maintain natural stream geomorphology when replacing culverts or design of new culverts or bridge crossings
Comments including listing increased maintenance in priority areas: Not Applicable; no rural roads in East Palo Alto.	

C.2.f. ► Corporation Yard BMP Implementation

Place an **X** in the boxes below that apply to your corporations yard(s):

<input type="checkbox"/>	We do not have a corporation yard
<input type="checkbox"/>	Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit
<input checked="" type="checkbox"/>	We have a Stormwater Pollution Prevention Plan (SWPPP) for the Corporation Yard(s)

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

<input checked="" type="checkbox"/>	Control of pollutant discharges to storm drains such as wash waters from cleaning vehicles and equipment
<input checked="" type="checkbox"/>	Routine inspection prior to the rainy seasons of corporation yard(s) to ensure non-stormwater discharges have not entered the storm drain system
<input checked="" type="checkbox"/>	Containment of all vehicle and equipment wash areas through plumbing to sanitary or another collection method
<input checked="" type="checkbox"/>	Use of dry cleanup methods when cleaning debris and spills from corporation yard(s) or collection of all wash water and disposing of wash water to sanitary or other location where it does not impact surface or groundwater when wet cleanup methods are used
<input checked="" type="checkbox"/>	Cover and/or berm outdoor storage areas containing waste pollutants

Comments: The City complies with the above corp yard BMPs, with working stockpiles remaining uncovered during			
If you have a corporation yard(s) that is not an NOI facility, complete the following table for inspection results for your corporation yard(s) or attach a summary including the following information:			
Corporation Yard Name	Inspection Date (1x/year required)	Inspection Findings/Results	Follow-up Actions
150 Tara Road East Palo Alto	October 28, 2014	1. Removal of paint stockpile is required due to capacity issues; requires maintenance plan for disposal and EPA ID number for containment storage. 2. Removal of street sweeping debris bin being considered due to Corp Yard being on a month-to-month rental contract; site may be moved to a location without sanitary sewer lines.	1. Paint has been recycled by hauler—storage container at full capacity with maintenance plan on emptying contents. 2. Street sweeping debris bin has been removed permanently.

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

C.3.b.v.(2)(a) ► Green Streets Status Report

(All projects to be completed by December 1, 2014)

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

Summary:

The C.3 New Development and Redevelopment section of the Countywide program’s FY 14-15 Annual Report includes a description of activities conducted at the countywide or regional level.

The Green Street Pilot Project Summary Report submitted by BASMAA, on behalf of the MRP permittees, in BASMAA’s MRP FY 12-13 Regional Supplement – New Development and Redevelopment includes information on the green street project constructed in our jurisdiction, including capital costs, O&M costs, legal and procedural arrangements to address O&M and its associated costs, and sustainable landscape measures.

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

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

C.3.e.v. ► Alternative or In-Lieu Compliance with Provision C.3.c.

(For FY 11-12 Annual Report and each Annual Report thereafter)

Is your agency choosing to require 100% LID treatment onsite for all Regulated Projects and not allow alternative compliance under Provision C.3.e.?

	Yes	X	No
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Comments (optional):

The City of East Palo Alto has opted to allow the use of public land for private bioretention for one project located at 2485 PULGAS AVENUE, EAST PALO ALTO, CA. This Montage project, a 51 unit subdivision, was entitled prior to December 2011, but with vault-based stormwater treatment as the primary treatment type. The project was redesigned to incorporate LID prior to building plan submittal and most of the site includes on-site bioretention, with one micro-watershed that lacked space for full LID due to space and grading constraints. By allowing the flexibility of off-site LID on adjacent lands, the project was not required to be completely redesigned. Special circumstances include a public trail that requires private maintenance by the HOA of this subdivision; the landscaping had not been designed and the grading allowed for direct discharge to this area. The LID bioretention system was allowed to be included in the public right-of-way for this special circumstance.

C.3.e.vi ► Special Projects Reporting

1. Has your agency received, but not yet granted final discretionary approval of, a development permit application for a project that has been identified as a potential Special Project based on criteria listed in MRP Provision C.3.e.ii(2) for any of the three categories of Special Projects (Categories A, B or C)?		Yes	<input checked="" type="checkbox"/>	No
2. Has your agency granted final discretionary approval of a project identified as a Special Project in the March 15, 2015 report? If yes, include the project in both the C.3.b.v.(1)Table, and the C.3.e.vi. Table.		Yes	<input checked="" type="checkbox"/>	No
If you answered "Yes" to either question, 1) Complete Table C.3.e.vi .below. 2) Attach narrative discussion of 100% LID Feasibility or Infeasibility for each project.				

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

(1) Fill in attached table C.3.h.iv.(1) or attach your own table including the same information.
(2) On an annual basis, provide a discussion of the inspection findings for the year and any common problems encountered with various types of treatment systems and/or HM controls. This discussion should include a general comparison to the inspection findings from the previous year.
Summary: Vegetation Based: Many plants in Bioretention areas seem to be suffering from the drought. May need to update irrigation systems to improve watering schedule during FY 15/16. Vault systems appear to be fully functional. Firehouse Grill has closed down. New business: Wing Stop. Training in BMPs to ensure vault is not contaminated due to trash washout. Opening FY 15/16.
(3) On an annual basis, provide a discussion of the effectiveness of the O&M Program and any proposed changes to improve the O&M Program (e.g., changes in prioritization plan or frequency of O&M inspections, other changes to improve effectiveness program).
Summary: O&M Verification program seems to be working fine. We are typically annually inspecting due to the poor plant establishment in dry conditions. In future years, it is hopeful that the vegetation will be properly irrigated to ensure survival.

(4) During the reporting year, did your agency:					
• Inspect all newly installed stormwater treatment systems and HM controls within 45 days of installation?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	Not applicable. No new facilities were installed.
• Inspect at least 20 percent of the total number of installed stormwater treatment systems or HM controls? ³	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	Not applicable. No treatment measures
• Inspect at least 20 percent of the total number of installed vault-based systems?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	Not applicable. No vault systems.
If you answered "No" to any of the questions above, please explain:					

C.3.i. ► Required Site Design Measures for Small Projects and Detached Single Family Home Projects

On an annual basis, discuss the implementation of the requirements of Provision C.3.i, including ordinance revisions, permit conditions, development of standard specifications and/or guidance materials, and staff training.

Summary:

BASMAA prepared standard specifications in four fact sheets regarding the site design measures listed in Provision C.3.i, as a resource for Permittees. We have modified local ordinances/policies/procedures and forms/checklists to require all applicable projects approved after December 1, 2012 to implement at least one of the site design measures listed in Provision C.3.i. We are using the following Program and BASMAA products for C.3.i implementation:

- **BASMAA's site design fact sheets**
- **The countywide program's checklist**
- **C.3.i guidance provided by the countywide program found at:**
http://www.flowstobay.org/sites/default/files/SMCWPPP%20C.3%20Technical%20Guidance%20Handbook_Oct_2014.pdf#overlay-context=newdevelopment

³If there is only 1 treatment measure in the jurisdiction, the agency must inspect it every year.

C.3.b.v.(1) ► Regulated Projects Reporting Table (part 1) – Projects Approved During the Fiscal Year Reporting Period

Project Name Project No.	Project Location ¹⁰ , Street Address	Name of Developer	Project Phase No. ¹¹	Project Type & Description ¹²	Project Watershed ¹³	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft ²) ¹⁴	Total Replaced Impervious Surface Area (ft ²) ¹⁵	Total Pre- Project Impervious Surface Area ¹⁶ (ft ²)	Total Post- Project Impervious Surface Area ¹⁷ (ft ²)
Private Projects											
Montage/ Edenbridge DKB Homes	2485 PULGAS AVENUE, EAST PALO ALTO, CA	EDENBRIDGE HOMES	No discrete phases; continuous project	SWPPP_WDID 2 41C370905	San Francisquito Creek	4.98 ACRES	4.98 Acres	3.1 Acres; 135,036 square feet	0	0	135,036
MidPen Senior Housing w/ EPA Can DO	2358 University Avenue	MidPen Housing	Single Phase	Removal of four single family homes and two duplexes, and development of 41-unit 4-story building, and parking amenities	San Francisquito Creek	0.75 Acres	0.75 Acres	28,760 square feet	21,500 square feet	21,500 square feet	50,260 square feet
2331 University Clarum Homes	2331 University Avenue 2014-250 260 290	Clarum Homes	Single Phase.	New multi-family housing project, new residential development, roadway, walkways and parking stalls	San Francisquito Creek	0.87 Acres	0.87 acres	19,936 square feet	2,379 square feet	7,062 square feet	22,315 square feet

¹⁰Include cross streets

¹¹If a project is being constructed in phases, indicate the phase number and use a separate row entry for each phase. If not, enter "NA".

¹²Project Type is the type of development (i.e., new and/or redevelopment). Example descriptions of development are: 5-story office building, residential with 160 single-family homes with five 4-story buildings to contain 200 condominiums, 100 unit 2-story shopping mall, mixed use retail and residential development (apartments), industrial warehouse.

¹³State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.

¹⁴All impervious surfaces added to any area of the site that was previously existing pervious surface.

¹⁵All impervious surfaces added to any area of the site that was previously existing impervious surface.

¹⁶For redevelopment projects, state the pre-project impervious surface area.

¹⁷For redevelopment projects, state the post-project impervious surface area.

C.3.b.v.(1) ► Regulated Projects Reporting Table (part 1) – Projects Approved During the Fiscal Year Reporting Period

Project Name Project No.	Project Location ¹⁰ , Street Address	Name of Developer	Project Phase No. ¹¹	Project Type & Description ¹²	Project Watershed ¹³	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft ²) ¹⁴	Total Replaced Impervious Surface Area (ft ²) ¹⁵	Total Pre- Project Impervious Surface Area ¹⁶ (ft ²)	Total Post- Project Impervious Surface Area ¹⁷ (ft ²)
Sobrato Projects	2100 University Avenue	Sobrato	Single Phase.	Two tower buildings	San Francisquito Creek	128,659 square feet; 2.95 Acres	128,659 square feet; 2.95 Acres	118,858 square feet	33,984 square feet	84,874 square feet	118,858 square feet
Public Projects											
No regulated projects approved FY 14/15	None approved FY 14/15	None approved FY 14/15	None approved FY 14/15	None approved FY 14/15	None approved FY 14/15	None approved FY 14/15	None approved FY 14/15	None approved FY 14/15	None approved FY 14/15	None approved FY 14/15	None approved FY 14/15
Comments:											

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

Fill in table below or attach your own table including the same information.

Name of Facility/Site Inspected	Address of Facility/Site Inspected	Newly Installed? (YES/NO) ¹⁸	Party Responsible ¹⁹ For Maintenance	Date of Inspection	Type of Inspection ²⁰	Type of Treatment/HM Control(s) Inspected ²¹	Inspection Findings or Results ²²	Enforcement Action Taken ²³	Comments/Follow-up
Pitcher Drilling	218 Demeter	No	Terry Shewchuk	1) 06/08/2015	1) O&M Inspection	Bioretention Areas	1) Installation final; correct with proper vegetation and irrigation 2) Issues with minor erosion indicate need for flow dissipation.	None; follow-up next year.	1) Inspection FY 15/16 check on erosion control installation, if applied. (May provide photo documentation voluntarily)
First Free Wesleyan Tongan Church	432 Bell St	No	First Free Wesleyan Tongan Church	06/23/2014	Installation	Infiltration Trench and Permeable Joint Pavement	Required removal of soil stockpile and appropriate plant spacing along with irrigation plan which has been completed.	None	Ongoing issues to finalize O&M due to improper state filing of name. Property owner is updating name to First Free Wesleyan Tongan Church (presently no "t" in Westeleyan).
1160 Weeks St Subdivision	1160-63 Weeks St	No	NHA Investments, individual homeowners	06/04/15	Installation	Bioretention area; pervious pavement	Property has sold to new owners; site inspection indicates plantings may require replacement post-drought. Requires reinspection FY 15/16.	None	Requires reinspection FY 15/16.
YMCA	550 Bell St	NO	YMCA	06/04/2014	O&M Verification	Inspection indicates updated cleanout required for FY 2015/16	Requires O&M Verification for FY 15/16	None	Requires cleanout verification for FY 15/16.

¹⁸Indicate "YES" if the facility was installed within the reporting period, or "NO" if installed during a previous fiscal year.

¹⁹State the responsible operator for installed stormwater treatment systems and HM controls.

²⁰State the type of inspection (e.g., 45-day, routine or scheduled, follow-up, etc.).

²¹State the type(s) of treatment systems inspected (e.g., bioretention facility, flow-through planter, infiltration basin, etc...) and the type(s) of HM controls inspected, and indicate whether the treatment system is an onsite, joint, or offsite system.

²²State the inspection findings or results (e.g., proper installation, improper installation, proper O&M, immediate maintenance needed, etc.).

²³State the enforcement action(s) taken, if any.

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

Fill in table below or attach your own table including the same information.

Name of Facility/Site Inspected	Address of Facility/Site Inspected	Newly Installed? (YES/NO) ¹⁸	Party Responsible ¹⁹ For Maintenance	Date of Inspection	Type of Inspection ²⁰	Type of Treatment/HM Control(s) Inspected ²¹	Inspection Findings or Results ²²	Enforcement Action Taken ²³	Comments/Follow-up
Cummings Park	1765 E. Bayshore Rd	NO	Cummings Park BOA and HOA	12/09/2013	O&M Verification	Inspection of site required immediate cleanout of underground vault; verification provided.	Visual inspection indicated cleaner site upon Firehouse Grill closing. Cleanout verification required for FY 15/16 inspection.	None	Ongoing annual requirements of SWTM O&M required. BMPs improving but still requires annual review. FY 15/16 Inspection
La Estrellita Market	2387 University Ave	NO	Hector Cornelio	06/04/2015	O&M Verification	Inspection conducted in FY 14/15. Site is being cleaned but new vegetation management will be required due to drought.	Visual inspection of swale indicates many plants may not survive drought; may require planting in FY 15/16— follow-up in Fall	None	Requires FY 15/16 inspection plant survival.
SUHSD Myrtle Street School	980 Myrtle St	NO	Sequoia Union High School District	06/04/2015	O&M Verification	Visual inspection of Myrtle St School indicates biotreatment in good shape;	Newly developed/expanded campus will require installation inspections; as needed	None	Ongoing installations. Requires inspection FY 15/16
MPPFD Fire Station #2	2290 University Ave	NO	Menlo Park Fire Protection District	04/30/15	O&M Verification	Inspection of Phase I installation received certification of maintenance of vault and oil/sand separator. SWTMs pending installation.	Site manager to provided certification of Vault and oil/water separator prior O&M being finalized. Site still under construction	None	Certification of vault and oil/water separator required prior to October 15, 2014; further inspections as-needed for new/redevelopment of site Phase
Ravenswood Family Health Center	1885 Bay Rd, East Palo Alto, CA 94303	Yes	Ravenswood Family Health Center Luisa Buada	10/14/15 04/09/15	O&M Installation	Inspection for all above ground flow-through planters and bioretention areas	Properly installed with some minor issues with irrigation heads that were covered with groundcover beginning to show erosivity during inspection; corrected at time of inspection	None	Installation inspection indicates well designed; follow-up in one year to ensure vegetation establishment.
Cooley Landing Phase III		Yes	City of East Palo Alto	9/30/14 12/5/14 6/28/15	O&M Installation	Bioretention areas along driveway	Installation ok; many plantings failed, requiring replacement of system. Acterra has agreed to take the lead on re-planting, new groundcover, and watering schedule during Fall 2015	None	Follow-up in December 2015 post replanting.

C.3.e.vi.Special Projects Reporting Table												
Reporting Period –January1 – June 30, 2015												
Project Name & No.	Permittee	Address	Application Submittal Date ²⁴	Status ²⁵	Description ²⁶	Site Total Acreage	Density DU/Acre	Density FAR	Special Project Category ²⁷	LID Treatment Reduction Credit Available ²⁸	List of LID Stormwater Treatment Systems ²⁹	List of Non-LID Stormwater Treatment Systems ³⁰
No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.	No Special Projects to report in this reporting period.

²⁴Date that a planning application for the Special Project was submitted.

²⁵ Indicate whether final discretionary approval is still pending or has been granted, and provide the date or version of the project plans upon which reporting is based.

²⁶Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.

²⁷ For each applicable Special Project Category, list the specific criteria applied to determine applicability. For each non-applicable Special Project Category, indicate n/a.

²⁸For each applicable Special Project Category, state the maximum total LID Treatment Reduction Credit available. For Category C Special Projects also list the individual Location, Density, and Minimized Surface Parking Credits available.

²⁹: List all LID stormwater treatment systems proposed. For each type, indicate the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area.

³⁰List all non-LID stormwater treatment systems proposed. For each type of non-LID treatment system, indicate: (1) the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area, and (2) whether the treatment system either meets minimum design criteria published by a government agency or received certification issued by a government agency, and reference the applicable criteria or certification.

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

Program Highlights

Provide background information, highlights, trends, etc.

In accordance with this provision, the City of East Palo Alto actively participated in these efforts: 1) conducted inspections; 2) conducted training; 3) participated in the Commercial, Industrial and Illicit Discharge (CII) Subcommittee; 4) follow-up on escalated enforcement for occurrences requiring escalation.

The City has again hired a new inspector after the most recent inspector resigned at the end of FY 14/15; the new inspector for the Public Works and Transportation Department will begin training and business inspections will again commence once this training is complete.

Due to the high rental markets, many businesses that were scheduled for inspection have moved out of their prior locations. While it is possible these businesses remain in East Palo Alto, time will be needed to determine the new locations as many are not self-reporting via obtaining a use permit or business license. Those businesses that have closed up shop are noted in the inspection reporting as “closed”.

Due to the length of time and follow-up required for some businesses, a significant increase in the number of temporary shelters and encampments requiring abatement, along with inspection staff transitioning, a number of businesses listed for 2014/15 inspections have been reprioritized for 2015/16 inspections.

Refer to the C.4. Industrial and Commercial Site Controls section of the SMCWPPP FY 14-15 Annual Report for a description of activities of SMCWPPP and/or the BASMAA Municipal Operations Committee. For FY 15/16, the City is again updating business plans, facilities lists, and inspection frequencies and priorities; 2) conducting inspections; 3) conducting training; 4) participating in a countywide committee or work group.

The City contracts stormwater inspection services with San Mateo County Environmental Health Department (SMCEH) for industrial, food, and hazardous waste specialties. Palo Alto Regional Water Quality Control Plant (PARWQCP) also conducts stormwater inspections for facilities that are customers in their service area, deemed

to have potential for stormwater pollution. Included separately are those facilities planned for inspection from San Mateo County Environmental Health Department, and also listed are those facilities that will potentially be inspected by the City and/or PARWQCP, as indicated in the table along with prior inspection years.

C.4.b.i. ► Business Inspection Plan

Do you have a Business Inspection Plan? Yes No

If No, explain:

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C.4.b.iii.(1) ► Potential Facilities List—San Mateo County

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

Name	Street Number	Street Name	City
NEW BRIDGE MARKET	922	NEW BRIDGE	EAST PALO ALTO
JUST LUNCH	1950	UNIVERSITY	EAST PALO ALTO
FOUR SEASONS HOTEL	2050	UNIVERSITY	EAST PALO ALTO
SF SOUP CO	1950	UNIVERSITY	EAST PALO ALTO
WELLS REIT II-UNIVERSITY CIRCLE	1900	UNIVERSITY	EAST PALO ALTO
TOGOS/BASKIN ROBBINS	1741	BAYSHORE	EAST PALO ALTO
OFFICE DEPOT #978	1761	BAYSHORE	EAST PALO ALTO
HEW DRILLING	1045	WEEKS	EAST PALO ALTO
EMMANUEL PIZZA & BAKERY INC	1489	BAYSHORE	EAST PALO ALTO
EASTSIDE MARKET	2368	CLARKE	EAST PALO ALTO
COOLEY AVENUE MARKET	2235	COOLEY	EAST PALO ALTO
PG&E: COOLEY LANDING SUBSTATION	2000	Bay	EAST PALO ALTO
ACE FIRE EQUIPMENT & SVC CO INC	1870	BAYSHORE	EAST PALO ALTO
CARLOS AUTO REPAIR	350	DEMETER	EAST PALO ALTO
J'S PRODUCT PAINTING CO INC	75	DEMETER	EAST PALO ALTO
FOUR SEASONS HOTEL	2050	UNIVERSITY	EAST PALO ALTO
IKEA EAST PALO ALTO	1700	BAYSHORE	EAST PALO ALTO
RONALD MCNAIR SCHOOL	2033	PULGAS	EAST PALO ALTO
EASTSIDE COLLEGE CAFETERIA	1043	MYRTLE	EAST PALO ALTO
RAVENSWOOD CHILD DEVELOPMENT CT	951	OCONNOR	EAST PALO ALTO
ASPIRE EAST PALO ALTO CHARTER SCHOOL	1286	RUNNYMEDE	EAST PALO ALTO
OUR COMMON GROUND	2560	PULGAS	EAST PALO ALTO
OAKWOOD MARKET INC	2106	OAKWOOD	EAST PALO ALTO
LLANOS AUTO REPAIR	1849	BAY	EAST PALO ALTO
CASE FURNITURE STRIPPING	2532	PULGAS	EAST PALO ALTO

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GARDEN SUPERMARKET	1933	PULGAS	EAST PALO ALTO
CEO STEEL FABRICATION INC	2530	PULGAS	EAST PALO ALTO
AUTOZONE #3302	2160	University	EAST PALO ALTO
TORRES PRINTEX	1175	WEEKS	EAST PALO ALTO
E PALO ALTO SHELL	2194	UNIVERSITY	EAST PALO ALTO
EPA CORP YARD	150	TARA	EAST PALO ALTO
A 1 AUTO SERVICE & TOWING	2526	PULGAS	EAST PALO ALTO
INFINITY SALVAGE	2091	BAY	EAST PALO ALTO
Verizon Wireless Palo Alto East	140	Demeter	EAST PALO ALTO
LAS ADELITAS RESTAURANT & MEAT MKT	2373	UNIVERSITY	EAST PALO ALTO
CAVALLINO COLLISION CENTER			EAST PALO ALTO
The Home Depot Store #6603	1781	Bayshore	EAST PALO ALTO
THREE BROTHERS TACOS	2220	UNIVERSITY	EAST PALO ALTO
TAQUERIA LOS TEMOS	1491	BAYSHORE	EAST PALO ALTO
OCEANNA CAFE	1781	BAYSHORE	EAST PALO ALTO
STARBUCKS COFFEE CO 5977 1745		BAYSHORE	EAST PALO ALTO
ONE STOP MARKET	1493	BAYSHORE	EAST PALO ALTO
LA ESTRELLITA	2387	UNIVERSITY	EAST PALO ALTO
PARKING CO OF AMERICA	160	Demeter	EAST PALO ALTO
RAVENSWOOD CITY SCHOOL DIST	2160	EUCLID	EAST PALO ALTO
COSTANO ELEMENTARY SCHOOL	2695	FORDHAM	EAST PALO ALTO
CHEVRON SERVICE STATION #1081	2101	University	EAST PALO ALTO
TOUCHATT TRUCKING	2535	PULGAS	EAST PALO ALTO
MCDONALDS RESTAURANT	1721	BAYSHORE	EAST PALO ALTO
TACO BELL	1701	BAYSHORE	EAST PALO ALTO
TAQUERIA LA CAZUELA	2390	CLARKE	EAST PALO ALTO
BRENTWOOD SCHOOL	2086	CLARKE	EAST PALO ALTO

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CESAR CHAVEZ ACADEMY	2350	RALMAR	EAST PALO ALTO
LOS ROBLES MAGNET ACADEMY	2450	RALMAR	EAST PALO ALTO
CATERED TOO	325	DEMETER	EAST PALO ALTO
MCDONALDS RESTAURANT	2401	UNIVERSITY	EAST PALO ALTO
PITCHER DRILLING CO	218	DEMETER	EAST PALO ALTO
NEVERIA Y PALETERIA LAS DELICIAS	2398	UNIVERSITY	EAST PALO ALTO
EL SABOR MICHOCANO	2398	UNIVERSITY	EAST PALO ALTO
PAL MARKET	2398	UNIVERSITY	EAST PALO ALTO
CARNICERIA RODRIQUEZ	2398	UNIVERSITY	EAST PALO ALTO
OCONNOR PUMP STATION	1180	OCONNOR	EAST PALO ALTO
EAST PALO ALTO ACADEMY	1050	MYRTLE	EAST PALO ALTO
ILLINOIS PURDUE PUMP STA	335	Demeter	EAST PALO ALTO
EAST PALO ALTO SENIOR CENTER	560	BELL	EAST PALO ALTO
MI PUEBLITO	2150	UNIVERSITY	EAST PALO ALTO
THREE BROTHERS TACOS	1760	BAYSHORE	EAST PALO ALTO
SEVEN ELEVEN FOOD STORE #14336 E	77	NEWELL	EAST PALO ALTO
CAL SPRAY INC	1905	BAY	EAST PALO ALTO
GLOBAL STEEL FABRICATORS, INC.	255	DEMETER	EAST PALO ALTO
CREATIVE MONTESSORI LEARNING CENTER	1421	BAY	EAST PALO ALTO
SMCO THHW	2415	UNIVERSITY	EAST PALO ALTO
UNA FIGURA PERFECTA	1895	BAYSHORE	EAST PALO ALTO
IZZY BROOKLYN BAGELS	2220	UNIVERSITY	EAST PALO ALTO
LA TIENDITA MARKET	510	OCONNOR	EAST PALO ALTO

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C.4.b.iii.(1) ► Potential Facilities List—City of East Palo Alto & PARWQCP, with prior inspection years

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

Priority Level	Facility Name	Facility address	Type of Business	Last Inspection
High	Cavalino Collision Repair	1880 W Bayshore Rd, Palo Alto, CA	Automotive PARWQCP	2013/2014
High	CSI Chevron	2101 University Ave	Gas Station/ Automotive PARWQCP	2013/2014
High	East Palo Alto Shell	2194 University Ave	Gas Station/ Automotive PARWQCP	2013/2014
High	Infiniti Salvage	2091 Bay Road	Automotive PARWQCP	2013/2014
High	Higuerra's Hauling	2519 Pulgas Ave (confirm)	Hauling	Closed
High	Parking Company of America	160 Demeter St	Automotive PARWQCP	2013/2014
High	A'S TOWING	TBD	automotive	Closed
High	Alfredo's carpet	831 Weeks st	Painting/Carpeting Mobile Business	Closed
High	Light Tree Apartments	1805 E. Bayshore Rd	apartments	2013/2014
High	Mikes Trucking	2527 Hazelwood Wy	automotive	Closed
High	Calspray	1905 Bay Rd	Industrial PARWQCP	2013/2014
Medium	Rainer's Service Station	1905 East Bayshore Road	Automotive PARWQCP	2013/2014
High	Ravenswood Ranch	1103 Weeks St	ranch/farm	2013/2014
High	SPECIALTY TOWING AND	2666 MIDDLEFIELD RD #B	towing	2013/2014
HIGH	SUNRISE ENTERPRISE 87,	264 TARA ST	towing	2013/2014
HIGH	Toubar Equipment, CS Trucking, JDP recycling, Touchatt Trucking	2535 Pulgas Ave	automotive	2013/2014

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HIGH	Winston Taylor Concrete	1195 Garden	construction	2013/2014
High	Oasis Painting	2374 Palo Verde Ave	HOME BASED BUSINESS	2013/2014
High	Mitchell's Carpet	252 Azalea	Home Based Business	2013/2014
High	Mongird Construction; Marek Kozlowski Construction; Velasquez Construction; HZ Construction, HZ	2509 Pulgas (may move prior to inspection)	Multiple Business	2013/2014
Medium	A 1 AUTO SERVICE &	2526 PULGAS	Automotive (PARWQCP)	2013/2014
Medium	ARTEAGA AUTO CLEANING AND	867 Weeks St	mobile auto	2013/2014
Medium	City of East Palo Alto Corp Yard	150 Tara Rd	Corp Yard Annual Inspection	2014/2015
Medium	Gonzalez Tires	2470A Pulgas Ave	tires	2013/2014
C.4.b.iii.(1) ► Potential Facilities List—City of East Palo Alto (cont'd 2)				
Medium	LOZANO'S AUTO REPAIR	1802 BAY ROAD	automotive	2013/2014
Medium	PALO ALTO PARK MUTUAL WATER CO	2190 ADDISON AVENUE	water purveyor	2013/2014
Medium	Sam's Pressure Washing	2305 Clarke Ave	mobile pressure washing	2013/2014
Low	SPORT AUTHORITY	1775 EAST BAYSHORE RD	retail	2013/2014
Medium	LA FAMILIA DISCOUNT	1803 BAY ROAD	retail	2013/2014
Medium	Ana's Party Store	910 Newbridge St	retail	2013/2014
Low	WOODLAND ARMS APARTMENTS EQR	466 O'Keefe mike Riley 566-2013	residential high density apartments	2013/2014
Medium	PUBLIC STORAGE INC.	1961 E. BAYSHORE RD	storage	2013/2014
Low	Bridge Property Management	1969 Tate Street	residential high density apartments	2013/2014

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Low	MONTEREY APARTMENTS	1838 W. BAYSHORE STREET	apartments	2013/2014
Low	COLONIAL APARTMENTS	1483 VIA CONTENTA CT.	apartments	2013/2014
Low	EUCLID AVENUE APARTMENTS	1910-1950 EUCLID AVE	apartments	2013/2014
Low	LEITRIM HOUSE APARTMENTS	275 EAST O'KEEFE STREET	apartments	2013/2014
Low	WOODLAND ARMS APARTMENTS	1717 WOODLAND AVE	apartments	2013/2014
Low	PARK APARTMENTS	280 EAST O'KEEFE STREET #D	apartments	2013/2014
Low	RUNNYMEDE GARDENS	2301 COOLEY AVENUE	apartments	2013/2014
Low	TRADEWINDS APARTMENTS	C/O BRUCE SWENSON	apartments	2013/2014
High	CS Trucking	2535 Pulgas Ave	trucking	2013/2014
HIGH	Firehouse Grill	1765 E. Bayshore Rd	food (stormwater issues)	2013/2014
High	Menlo Food Corp	175 Demeter	Referred CEH	2013/2014
High	Starbucks	1745 E Bayshore	food (stormwater issues)	5/16/2013

C.4.b.iii.(1) ► Potential Facilities List—City of East Palo Alto Cont'd (3)					
Medium	Carlos Auto	350 Demeter	automotive	Referred to SMCEH	2013/2014
Medium	RE Bormann's Steel C	2450 Pulgas Ave	Industrial	Referred to SMCEH	2013/2014
List below or attach your list of industrial and commercial facilities in your Inspection Plan to inspect that could reasonably be considered to cause or contribute to runoff.					
Medium	Las Aldelitas	2373 university Ave	food/stormwater	Referred to SMCEH	2013/2014
Medium	La Estrellita	2387 University Ave	food/stormwater	Referred to SMCEH	2013/2014
Medium	Global Steel	255 Demeter	Industrial	Referred to SMCEH	2013/2014
Medium	Mi Pueblo	1731 E. Bayshore	food/stormwater	Referred to SMCEH	2013/2014
High	Palo Alto Concrete	1923 Pulgas	construction	CLOSED	2013/2014
Medium	JAT TRUCK #1	1244 LAUREL AVENUE	mobile auto	CLOSED	2013/2014
High	1172 Beech St Recycling	1172 Beech St	Home Based Recycling	CLOSED	2013/2014
Medium	JBR Taxi Cab	1885 East Bayshore Road #99	automotive	CLOSED	2013/2014

C.4.b.iii.(2) ► Facilities Scheduled for Inspection		
List below or attach your list of facilities scheduled for inspection during the current fiscal year.		
See C.4.b.iii (1) matrix for those facilities noted with FY 2015/16 for inspections likely to be conducted in the coming fiscal year.		
C.4.c.iii.(1) ► Facility Inspections—San Mateo County Environmental Health Department		
Fill out the following table or attach a summary of the following information. Indicate your violation reporting methodology below.		
<input checked="" type="checkbox"/>	Permittee reports multiple discrete violations on a site as one violation.	
<input type="checkbox"/>	Permittee reports the total number of discrete violations on each site.	
	Number	Percent
Number of businesses inspected	22	
Total number of inspections conducted	22	
Number of violations (excluding verbal warnings)	0	
Sites inspected in violation	0	
Violations resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	0	0%
Comments: 1) All violations noted on a particular site are included as a single violation. 2) Several sites closed down in part as a result of violations. 2) One site has ongoing violations due to the original construction design, which allows the ongoing sale of nursery products without sanitary sewer connection. The Home Depot has spent a tremendous amount of time and resources to develop new standard operating procedures to change the practices on-site to ensure stormwater compliance. Finalization of these new procedures will be used as a pilot for operations in other municipalities and are expected to be approved in FY 15/16.		

C.4.c.iii.(2) ▶ Frequency and Types/Categories of Violations Observed— San Mateo County Environmental Health Department

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

Type/Category of Violations Observed	Number of Violations
Actual discharge (e.g. active non-stormwater discharge or clear evidence of a recent discharge)	0
Potential discharge and other	0
Comments: Discharge streams are counted one discharge per inspection per site.	

C.4.c.iii.(1) ▶ Facility Inspections—City of East Palo Alto

Fill out the following table or attach a summary of the following information. Indicate your violation reporting methodology below.

<input checked="" type="checkbox"/>	Permittee reports multiple discrete violations on a site as one violation.
<input type="checkbox"/>	Permittee reports the total number of discrete violations on each site.

	Number	Percent
Number of businesses inspected	31	
Total number of inspections conducted	51	
Number of violations (excluding verbal warnings)	9	
Sites inspected in violation	9	
Violations resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	8	89%

Comments:

- 3) All violations noted on a particular site are included as a single violation.
- 4) Several sites closed down in part as a result of violations.
- 2) One site has ongoing violations due to the original construction design, which allows the ongoing sale of nursery products without sanitary sewer connection. The Home Depot has spent a tremendous amount of time and resources to develop new standard operating procedures to change the practices on-site to ensure stormwater compliance. Finalization of these new procedures will be used as a pilot for operations in other municipalities and are expected to be approved in FY 15/16.

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

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

Type/Category of Violations Observed	Number of Violations
Actual discharge (e.g. active non-stormwater discharge or clear evidence of a recent discharge)	0
Potential discharge and other	4
Comments: Discharge streams are counted one discharge per inspection per site.	

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

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

	Enforcement Action (as listed in ERP) ²⁵	Number of Enforcement Actions Taken	% of Enforcement Actions Taken ²⁶
Level 1	Verbal Warning / Written Notice/Minor Violation—Return to Compliance	17	65%
Level 2	Warning Notice or Administrative Action or Stop Work Notice	7	27%
Level 3	Administrative Action with Penalty and/or Cost Recovery	2	8%
Level 4	Legal Action	0	0%
Total		26	100%

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

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

Business Category ²⁷	Number of Actual Discharge Violations	Number of Potential/Other Discharge Violations
Automotive (may be home based)	0	5
Mobile Business/Home Based (not automotive)	0	4
Light Industrial	0	3
Food, Health, Restaurant or Market	0	5
Apartment Complex or subcontractor thereof	0	2

²⁵Agencies to list specific enforcement actions as defined in their ERPs.

²⁶Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

²⁷List your Program's standard business categories.

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C.4.c.iii.(4) ▶ Non-Filers

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

[WDID# 2 41C361853](#) Address: 2535 Pulgas Ave, East Palo Alto, CA 94303 Touchatt Trucking, CSS Trucking, and Toubar Equipment site is documented as having an Industrial General Permit, however records of inspections by the State have indicated no inspections have occurred. The City of East Palo Alto is requesting to see inspection records for this site. Requests for follow-up have not resulted in any information being provided.

C.4.d.iii ▶ Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
Randy Craig	December, 2014 January 2015, February 2015 March 2015, April 2015, May 2015 June 2015	Monthly Construction and New Development Inspections BMP inspections, pre and post construction	2	100%
Jordan Samari	July 2014 August 2014 September 2014 October 2014	Monthly Construction and New Development Inspections BMP inspections, pre and post construction	2	100%

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

Program Highlights

Provide background information, highlights, trends, etc.

[The City has been reliant on first providing an education to local businesses in proper BMPs to ensure illicit discharges are prevented. For detection, the team of staff and community members to notify when an illicit discharge is imminent, and contacts the City’s Code Enforcement officer to make a determination. If the Officer finds there is indeed an imminent threat to stormwater quality, the Environmental Inspector is sent to the scene to take a report and ensure compliance. The City participates in the SMCWPPP committee work group for CII Refer to the C.5 Illicit Discharge Detection and Elimination section of countywide program’s FY 14-15 Annual Report \(if applicable\) for description of activities at the countywide or regional level.](#)

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

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

Contact	Description	Phone Number
Public Right of Way: Jay Farr	Maintenance Division Manager	650-853-3105
Private Property: Jerome C	Code Enforcement Officer	650-853-5942
All: Michelle Daher	Management Analyst/Environmental Inspector	650-853-3197

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

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

Description:

[The City of East Palo Alto currently addresses mobile businesses by the following actions:](#)

- [1. Business Permit: Provide requirements for stormwater protection for potentially impacting businesses and requiring BMPs recommended by the BASMAA Mobile Surface Cleaners Program, etc](#)
- [2. Respond to complaints/observations of illicit discharges with inspection](#)
- [3. The City does not hire Mobile Surface Cleaners; surface cleaning is conducted in-house with the City’s vactor truck or smaller scale vacuum system in the course of surface cleaning.](#)

[Refer to the C.5 Illicit Discharge Detection and Elimination section of countywide program’s FY 14-15 Annual Report\(if applicable\) for a description of efforts by countywide committees/work group and the BASMAA Municipal Operations Committee to address mobile businesses.](#)

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

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

Description:

The City conducts a collection screening program prior to the beginning of the storm system (prior to October 30), and a screening at the end of the storm season (in June) to assess and clean the stormdrain system. The City inspects stormdrain inlets, and outfalls, as well as the “trash hot spot” for the City. The City participates in an annual walk through for San Francisquito Creek during the first two weeks of September, as a partner in the Joint Powers Authority, to observe and report on incidents of illegal dumping, homeless encampments, and any illicit discharges or water discoloration. Materials identified are addressed by the responsible party from each jurisdiction. If FY 14/15, the amount of non-stormwater materials found in these systems was generally quite lower with the exception of a significant disproportion of hazardous waste material being found in and around the creek, and a large number of persons creating encampments and temporary dwellings near the waterways. This has required a substantial amount of staff time, resulting in less time to dedicate towards business inspections.

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

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

	Number	Percentage
Discharges reported (C.5.f.iii.(1))	24	
Discharges reaching storm drains and/or receiving waters (C.5.f.iii.(2))	2	
Discharges resolved in a timely manner (C.5.f.iii.(3))	23	98.5%

Comments:

Many reports were unsubstantiated, but there was a case of hazardous waste that was illegally dumped directly into San Francisquito Creek which took over 2 months to retrieve due to lack of jurisdiction and unknown property ownership, lack of access along with unknown responsibility. In the end, the fire department was called to retrieve the materials with ropes. This matter is being looked into for better coordination.

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

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

A majority of these calls relate to either sanitary discharge or illegal dumping. A number of residents are calling in about leaking passenger vehicles, primarily because they do not like to see their neighbors parking on the street in front of their house. In some cases, people are dumping trash into the stormdrain system and lighting it on fire.

Section 6 – Provision C.6 Construction Site Controls

C.6.e.iii.1.a, b, c ▶ Site/Inspection Totals		
Number of High Priority Sites (sites disturbing < 1 acre of soil requiring storm water runoff quality inspection) (C.6.e.iii.1.a)	Number of sites disturbing ≥ 1 acre of soil (C.6.e.iii.1.b)	Total number of storm water runoff quality inspections conducted (include only High Priority Site and sites disturbing 1 acre or more) (C.6.e.iii.1.c)
#	#	#
1	2	18
Comments: 1) The City conducted construction inspections monthly for the Ravenswood Family Health Clinic and Montage Homes, and 1160 Weeks Street subdivision. 2) Of the monthly inspections, only minor violations have been observed during FY 14/15.		

C.6.e.iii.1.d ▶ Construction Activities Storm Water Violations		
BMP Category	Number of Violations²⁸ excluding Verbal Warnings	% of Total Violations²⁹
Erosion Control	0	0%
Run-on and Run-off Control	0	0%
Sediment Control	0	0%
Active Treatment Systems	0	0%
Good Site Management	0	0%
Non Stormwater Management	0	0%
Total³⁰		100%

²⁸Count one violation in a category for each site and inspection regardless of how many violations/problems occurred in the BMP category. For example, if during one inspection at a site, there are 2 erosion control violations, only 1 violation would be counted for this table.

²⁹Percentage calculated as number of violations in each category divided by total number of violations in all six categories.

³⁰The total number of violations may count more than one violation per inspection, since some inspections may result in violations in more than one category. For example, during one inspection of a site, there may have been both an erosion control violation and a sediment control violation. For this reason, the total number of violations in this table may not match the total number of enforcement actions reported in Table C6.e.iii.1.e.

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

	Enforcement Action (as listed in ERP) ³¹	Number Enforcement Actions Issued	% Enforcement Actions Issued ³²
Level 1 ³³	Verbal Warning / Written Notice/Minor Violation—Return to Compliance	11	100%
Level 2	Warning Notice or Administrative Action or Stop Work Notice	0	0%
Level 3	Administrative Action with Penalty and/or Cost Recovery	0	0%
Level 4	Legal Action	0	0%
Total			100%

C.6.e.iii.1.f, g ► Illicit Discharges

	Number
Number of illicit discharges, actual and those inferred through evidence at high priority sites and sites that disturb 1 acre or more of land (C.6.e.iii.1.f)	0
Number of sites with discharges, actual and those inferred through evidence at high priority sites and sites that disturb 1 acre or more of land (C.6.e.iii.1.g)	0

³¹Agencies should list the specific enforcement actions as defined in their ERPs.

³²Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

³³For example, Enforcement Level 1 may be Verbal Warning.

C.6.e.iii.1.h, i ► Violation Correction Times		
	Number	Percent
Violations (excluding verbal warnings) fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii.1.h)	0	0% ³⁴
Violations (excluding verbal warnings) not fully corrected within 30 days after violations are discovered (C.6.e.iii.1.i)	0	0% ³⁵
Total number of violations (excluding verbal warnings) for the reporting year³⁶		100%
<p style="text-align: center;">• Comments:</p> <p>The City did not have any stormwater violations due to construction inspections. All verbal violations were resolved immediately, or certainly within ten days or prior to a rain event, likely due to the generally dry year.</p>		

C.6.e.iii.(2) ► Evaluation of Inspection Data
Describe your evaluation of the tracking data and data summaries and provide information on the evaluation results (e.g., data trends, typical BMP performance issues, comparisons to previous years, etc.).
Description: Construction crews are responsive and willing to comply with requests for improving BMPs. We are seeing a significant increase in all contractors being familiar with expectations, and preempting City requirements by making proposals to ensure water quality is protected.

(ii)

C.6.e.iii.(2) ► Evaluation of Inspection Program Effectiveness
Describe what appear to be your program's strengths and weaknesses, and identify needed improvements, including education and outreach.
Description: The City's construction inspection program is a continual development as the stormwater construction inspectors continue to become trained and move on to other professions. The City continues to implement MRP requirements, such as: 1) participating in revising stormwater construction inspection forms and inspection data tracking tools through SMCWPPP; 2) The City provides training to new inspectors and provides updated

³⁴Calculated as number of violations fully corrected in a timely period after the violations are discovered divided by the total number of violations for the reporting year.

³⁵Calculated as number of violations not fully corrected within 30 days after the violations are discovered divided by the total number of violations for the reporting year.

- ³⁶The total number of violations reported in the table of Violation Correction Times equals the number of initial enforcement actions. I.e., This assumes one violation is issued for several problems during an inspection at a site. The total number of violations in the table of Violation Correction Times may not equal the total number of enforcement actions because one violation issued at a site may have a second enforcement action for the same violation at the next inspection if it is not corrected.

Permittee Name: [City of East Palo Alto](#)

inspection training for improving the inspection program; 3) While the City is able to continuously provide inspections for construction projects, we are still working on ensuring the project is not provided with occupancy/final inspection approval when BMPs have not been removed from the City stormdrain system. This is an ongoing issue that requires remedy.
 Refer to the C.6 Construction Site Control section of countywide program's FY 14-15 Annual Report (if applicable) for a description of activities at the countywide or regional level.

C.6.f ▶ Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
Randy Craig	December, 2014 January 2015, February 2015 March 2015, April 2015, May 2015 June 2015	Monthly Construction and New Development Inspections BMP inspections, pre and post construction	2	100%
Jordan Samari	July 2014 August 2014 September 2014 October 2014	Monthly Construction and New Development Inspections BMP inspections, pre and post construction	2	100%

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

C.7.b.ii.1 ▶ Advertising Campaign

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

Summary:

[The following separate report developed by BASMAA summarizes the activities of the Regional Youth Litter Campaign](#)
 • [BASMAA Be the Street Campaign Report](#)

C.7.b.iii.1 ▶ Pre-Campaign Survey

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

[Information on the pre-campaign survey for the BASMAA Regional Youth Litter Campaign was provided in the FY 11-12 Annual Report.](#)

Place an **X** in the appropriate box below:

	Survey report attached
<input checked="" type="checkbox"/>	Reference to regional submittal:

C.7.b.iii.2 ▶ Post-Campaign Survey

(For the Annual Report following the post-campaign survey) Discuss the campaigns and the measurable changes in awareness and behavior achieved. Provide an update of outreach strategies based on the survey results. If survey was done regionally, refer to a regional submittal that contains the following information:

[Information on the post-campaign survey for the BASMAA Regional Youth Litter Campaign was provided in the BASMAA FY 13-14 Annual Report.](#)

Place an **X** in the appropriate box below:

	Survey report attached
<input checked="" type="checkbox"/>	Reference to regional submittal:

C.7.c ► Media Relations

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

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

Summary:

[The following separate report developed by BASMAA summarizes media relations efforts conducted during FY 14-15:](#)

- [BASMAA Media Relations Final Report FY 14-15](#)

[This report and any other media relations efforts conducted countywide is included within the C.7 Public Information and Outreach section of the Countywide Program's FY 14-15 Annual Report.](#)

C.7.d ► Stormwater Point of Contact

Summary of any changes made during FY 14-15:

[No Change.](#)

C.7.e ► Public Outreach Events

Describe general approach to event selection. Provide a list of outreach materials and giveaways distributed.

Use the following table for reporting and evaluating public outreach events

Event Details	Description (messages, audience)	Evaluation of Effectiveness
City's Earth Day Event	Community Event, Earth Day	<p>Encouraged sign-ups with roughly</p> <ul style="list-style-type: none"> • 100 participants • Outreach for tree planting and care, water conservation, community cleanups, graffiti abatement, less toxic pest control • Distributed about 100 shower timers

C.7.f. ► Watershed Stewardship Collaborative Efforts

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

Evaluate effectiveness by describing the following:

- Efforts undertaken
- Major accomplishments

Summary:

The City provided support for Coastal Cleanup Day, Watershed Monitoring through the local high school, Menlo Atherton, through the Environmental Chemistry program, and partnership with Acterra (funded separately by grants) to engage the students in taking water quality samples. Eastside Preparatory School conducted their 8th annual Coastal Cleanup Day, which included watershed monitoring components.

C.7.g. ► Citizen Involvement Events

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

Event Details	Description	Evaluation of effectiveness
Provide event name, date, and location. Indicate if event is local, countywide or regional	Describe activity (e.g., creek clean-up, storm drain marking etc.)	Provide general staff feedback on the event. Provide other evaluation details such as: <ul style="list-style-type: none"> • Number of participants. Any change in participation from previous years. • Distance of creek or water body cleaned • Quantity of trash/recyclables collected (weight or volume). • Number of inlets marked. • Data trends
Fall 2014: The City assisted with Menlo Atherton High School Environmental Chemistry Program to engage citizen scientists to monitor water quality	Provide 30 minute presentation to 40 students in 3 classrooms, for a total of 120 students reached.	120 participants Cleaned 2 miles of creek Removed 240 gallons of trash Obtained data including select street runoff including oily sheen, turbidity, and temperature from streets.
April 2015	Earth Day Event	Acterra (local non-profit) partnered for Earth Day event, taking water quality samples, 40 participants

		Removed 50 gallons of trash from local streets
Monthly Alleluia Church Operation Clean Sweep Cleanup	Support Alleluia Church by assisting with drinks, snacks, supplies to peaceful march, sing and remove litter	Over 2000 lbs of trash and debris removed from City Streets About 60 volunteers, ongoing cleanup
Toyota Family Learning Event	Over 120 families participated in neighborhood cleanup through library program	Over 200 participants removed over 1500 pounds of trash from local roadway, celebrating with party at the end, with lunch and books provided by the library.

C.7.h. ► School-Age Children Outreach

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

Program Details	Focus & Short Description	Number of Students/Teachers reached	Evaluation of Effectiveness
Fall 2014: The City assisted with Menlo Atherton High School Environmental Chemistry Program to engage citizen scientists to monitor water quality	Provide 30 minute presentation to 40 students in 3 classrooms, for a total of 120 students reached. Ages 13-18	120 participants Cleaned 2 miles of creek Removed 240 gallons of trash Obtained data including select street runoff including oily sheen, turbidity, and temperature from streets.	This program is deemed effective as students come out on their own to return to clean up the community, even beyond the graduation from the program.
April 2015	Earth Day Event—all ages (infant to 80)	Acterra (local non-profit) partnered for Earth Day event, taking water quality samples, 40 participants Removed 50 gallons of trash from local	This program is deemed effective, as numbers for volunteer programs with partnering agencies have substantially increased overall.

		streets, with over 2000 gallons removed collectively.	
Monthly Alleluia Church Operation Clean Sweep Cleanup	Support Alleluia Church by assisting with drinks, snacks, supplies to peaceful march, sing and remove litter (all ages infant to 80)	Over 1500 gallons of trash and debris removed from City Streets About 60 volunteers, ongoing cleanup each month, with an average of 150 gallons collected each month, over 10 months each year.	This program is deemed most effective as it is community based and appears to be taking off with other local churches becoming engaged in "Operation Clean Sweep"—it is expected this program will expand during FY 2015/16 with the inclusion of a very large Catholic church in the Clean Zones program.
Toyota Family Learning Event	Over 120 families participated in neighborhood cleanup through library program (all ages, infant to 80+)	Over 200 participants removed over 1500 gallons of trash from local roadway, celebrating with party at the end, with lunch and books provided by the library.	This program is deemed effective as the local volunteers have moved on to becoming very engaged in setting up neighborhood outreach campaigns and their own "block clean-ups".
East Palo Alto Tennis and Tutoring Club	Thirty students removing litter over 2 hours, two events in the summer (middle school children)	30 students removed 500 gallons of litter from City streets	This program was deemed successful as the students were engaged and excited to take pride in their beautiful community.
Acterra Non Profit Cosco Busante Grant at Bay Trail/ Cooley Landing	Ongoing volunteer commitment to clean up Bay Trail, along Runnymede Drainage Ditch which discharges directly into San Francisquio Creek and Cooley Landing, right at the mouth of the San Francisco Bay. (high school aged students)	Average of 13 volunteers remove an average of 20 gallons of trash each, once per month, over 12 months for over 3120 gallons removed this year.	This program is deemed a success as Acterra seeks to provide local students with a connection to the natural world through cleanup and remediation planting. Students throughout the region are engaged and coming back to keep this area clean, which prevents people from illegally dumping since the area is activated.

Boys and Girls Club	One-time cleanup event to address litter in nearby streets (middle school students)	20 students removed 20 gallons of trash on average, each, 400 gallons total	This program is deemed highly effective and is likely to provide an avenue for the after school and summer program to provide community service opportunities in the future for these students.
Eastside Prep	Annual Cleanup Event of Runnymede Drainage Ditch between Runnymede Street and Highway 101—8 years consecutive cleanup events (middle and high school students, and families)	80 families remove an average of 40 gallons each over 4 hour block; 3200 gallons of trash removed annually	This program is deemed highly effective as students and families clean up their local waterway and take ongoing action in leadership to improve the community and reduce blight.
12,460 Gallons of trash removed by (non trash hot spot) volunteer commitment!			

Section 8 - Provision C.8 Water Quality Monitoring

C.8 ► Water Quality Monitoring

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

Summary

During FY 14-15, we contributed through the countywide Program to the BASMAA Regional Monitoring Coalition (RMC). In addition, we contributed financially to the Regional Monitoring Program for Water Quality in the San Francisco Estuary (RMP) and were represented at RMP committees and work groups. Monitoring efforts and results are documented in a separate report submitted March 15 of each year, as required in Provision C.8. For additional information on monitoring activities conducted by the Program, BASMAA RMC and the RMP, see the C.8 Water Quality Monitoring section of the Program's FY 14-15 Annual Report and the Integrated Monitoring Report.

City staff has advocated to be included in the monitoring program to further detail hot spots for PCBs, Mercury and Legacy Pesticides by collaborating to determine appropriate locations for sampling and coordinate sampling events.

Section 9 – Provision C.9 Pesticides Toxicity Controls

C.9.b ► Implement IPM Policy or Ordinance						
Report implementation of IPM BMPs by showing trends in quantities and types of pesticides used, and suggest reasons for increases in use of pesticides that threaten water quality, specifically organophosphates, pyrethroids, carbaryl, and fipronil. A separate report can be attached as evidence of your implementation.						
Trends in Quantities and Types of Pesticides Used³⁷						
Organophosphates Phantom EPA Reg#241-392	Amount³⁸					
	FY 09-10	FY 10-11	FY 11-12	FY 12-13	FY 13-14	FY 14-15
	Data unavailable	None Applied	None Applied	None Applied	None Applied	None Applied
Pyrethroids	Data unavailable	868 ounces	None Applied	None Applied	None Applied	None Applied
*Cy-Kick CS .05% * Note, reporting references two types of materials, diluted and concentrated.	Data unavailable	None Applied	None Applied	None Applied	None Applied	None Applied
Temp Ultra EPA Reg#431-1363 diluted ounces	Data unavailable	None Applied	None Applied	None Applied	None Applied	None Applied
Carbaryl	Data unavailable	None Applied	1585 ounces (diluted)	2489 ounces (diluted)	1.1 ounces (concentrated)	None Applied
Fipronil	Data unavailable	2396 ounces (diluted)	1235 ounces (diluted)	2713 ounces (diluted)	None Applied	None Applied
Organophosphates	Data unavailable	None Applied	None Applied	None Applied	None Applied	None Applied
Phantom EPA Reg#241-392	Data unavailable	None Applied	None Applied	None Applied	None Applied	None Applied

³⁷Includes all municipal structural and landscape pesticide usage by employees and contractors.

³⁸Weight or volume of the product or preferably its active ingredient, using same units for the product each year. The active ingredients in any pesticide are listed on the label. The list of active ingredients that need to be reported in the pyrethroids class includes: allethrin, bifenthrin, beta-cyfluthrin, bioallethrin, cyfluthrin, cypermethrin, cyphenothrin, deltamethrin, esfenvalerate, etofenprox, fenpropathrin, gamma-cyhalothrin, imiprothrin, lambda-cyhalothrin, metofluthrin, permethrin, phenothrin, prallethrin, resmethrin, sumithrin (d-phenothrin), tau-fluvalinate, tefluthrin, tetramethrin, tralomethrin, cis-permethrin, and zeta-cypermethrin.

C.9.c ▶ Train Municipal Employees	
Enter the number of employees that applied or used pesticides (including herbicides) within the scope of their duties this reporting year.	8
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within the last 3 years.	8
Enter the percentage of municipal employees who apply pesticides who have received training in the IPM policy and IPM standard operating procedures within the last three years.	100

C.9.d ▶ Require Contractors to Implement IPM			
Did your municipality contract with any pesticide service provider in the reporting year?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
If yes, attach one of the following:			
<input type="checkbox"/>	Contract specifications that require adherence to your IPM policy and standard operating procedures, OR		
<input type="checkbox"/>	Copy(ies) of the contractors' IPM certification(s) or equivalent, OR		
<input checked="" type="checkbox"/>	Equivalent documentation.		
If Not attached , explain: The City has worked with the contractor to use pesticides as a last resort. To date, no pesticides have been used during FY 13/14 by Terminix in East Palo Alto, per contractor report.			

C.9.e ▶ Track and Participate in Relevant Regulatory Processes
Summarize participation efforts, information submitted, and how regulatory actions were affected OR reference a regional report that summarizes regional participation efforts, information submitted, and how regulatory actions were affected.
Summary: During FY 14-15, we participated in regulatory processes related to pesticides through contributions to the countywide Program, BASMAA and CASQA. For additional information, see the Regional Report submitted by BASMAA on behalf of all MRP Permittees.

C.9.f ▶ Interface with County Agricultural Commissioners

Did your municipal staff observe any improper pesticide usage or evidence of improper usage (e.g., pesticides in storm drain systems, along street curbs, or in receiving waters) during this fiscal year?		Yes	X	No
<p>If yes, provide a summary of improper pesticide usage reported to the County Agricultural Commissioner and follow-up actions taken to correct any violations. A separate report can be attached as your summary.</p> <p>The City has been working with the San Mateo County Agricultural Commissioner to obtain EPA ID number, and to quantify the amount of Round-UP Pro Max that is being used in Public Right of Way areas, and continuously report this information in a timely basis, as well as label tools and equipment to notify the public of the spray locations, where applicable..</p>				

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

Provide a summary of public outreach at point of purchase, and any measurable awareness and behavior changes resulting from outreach (here or in a separate report); OR reference a report of a regional effort for public outreach in which your agency participates.
<p>Summary:</p> <p>See the C.9 Pesticides Toxicity Control section of Program's FY 14-15 Annual Report for information on point of purchase public outreach conducted countywide and regionally.</p>

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

Provide a summary of public outreach to pest control operators and landscapers and reduced pesticide use (here or in a separate report); OR reference a report of a regional effort for outreach to pest control operators and landscapers in which your agency participates.
<p>Summary:</p> <p>See the C.9 Pesticides Toxicity Control section of Program's FY 14-15 Annual Report for a summary of our participation in and contributions towards countywide and regional public outreach to pest control operators and landscapers to reduce pesticide use.</p>

Section 10 - Provision C.10 Trash Load Reduction

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

Provide the following:

- 1) Total number and types of full capture devices (publicly and privately-owned) installed to-date;
- 2) Total land area (acres) and land areas within each trash generation category (i.e., very high, high, moderate and low) treated by full capture devices (or other types of devices for non-population based Permittees); and, compare with the total required in the permit.
- 3) A narrative summary of maintenance activities implemented for each device, group of devices, or device type, including descriptions of typical maintenance frequencies and issues associated with maintaining these devices. Describe, in particular, any devices that have trash or debris overflowed, bypassed or are not functioning properly in any other manner. Describe corrective actions.

Type of Device	# of Devices	Acres Treated in FY 14-15 by Trash Generation Category				
		Low	Moderate	High	Very High	Total
EPA01	38	11	22	7	10	55
Total for all Types						55

Maintenance Summary (Describe, in particular, any devices that have trash or debris overflowed, bypassed or are not functioning properly in any other manner. Describe corrective actions).

***The City of East Palo Alto performed two clean-outs of MRP-required trash capture devices during FY 14-15. Once in June after the rainy season, and once in October, prior to the rainy season. A large number of leaf litter was filling stormdrain where the baskets were installed, resulting in a few locations experiencing localized flooding due to overwhelmed trash capture devices. Standing water has presented a hazard, and additional maintenance will be required in future years.**

****The MRP requires 30% of Retail/Wholesale Land to incorporate full trash capture. In East Palo Alto, with retail represents roughly 61 acres of land, which requires 18.3 acres for treatment under the MRP; the amount treated by full trash capture amounts to 25 acres, or roughly 41%, plus additional acreage treated amounting to 30 additional acres in areas that are not retail.**

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

Provide the volume of material removed during each MRP-required Trash Hot Spot cleanup during each fiscal year, and the dominant types of trash (e.g., glass, plastics, paper) removed and their sources in FY 2014-15 to the extent possible. Also, provide additional information on creek cleanups conducted beyond those required that are .

Trash Hot Spot	FY 14-15 Cleanup Date(s)	Volume of Trash Removed (cubic yards)					Dominant Type(s) of Trash in FY 2014-15	Trash Sources in FY 2014-15 (where possible)
		FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15		
San Francisquito Creek	09/20/14	9.7	3.5	1.6	3.6	2.4	Plastic, cigarette butts	Fast Food, Single use packaging

Additional Receiving Water Cleanups – If claimed as load reductions described in C.10.d – part C, describe the number and frequency of receiving water cleanups conducted in addition to those reported above. Include locations, cleanup dates, and the total volume of trash removed. Describe the overall plan, if any, associated with these additional cleanups if meant to change the trash condition of certain reaches of creeks or shorelines.

The City has supported a variety of community cleanups, amounting to a substantial trash load reduction in the community, focusing on community-led cleanups where leaders in the community request City support in conducting targeted events. The City has supported these events by providing locations, cleanup materials, and material removal for the events, while the community members organize themselves and provide supervision and support. In a few cases, the Police Department is involved for traffic control, for very large group cleanups. This tends to be a favorite event for the Police who support the event. In total, at least 12,460 gallons, or nearly 62 cubic yards of material was removed from the public right-of-way during these volunteer events.

C.10.c ► Long-Term Trash Load Reduction Plan

Provide descriptions of significant revisions made to your Long-term Trash Load Reduction Plan submitted to the Water Board in February 2014. Describe significant changes made to primary or secondary trash management areas (TMA), trash generation maps, control measures, or time schedules identified in your plan.

Description of Significant Revision	Associated TMA
No significant changes made to long term plans, to date.	

C.10.d ► PART A - Trash Control Measure Implementation and Assessment (Jurisdictional-wide Actions)

Provide a description of each jurisdictional-wide trash control measure implemented to-date. Identify the dominant trash source(s) and dominant type(s) of trash addressed by each control measure. For each jurisdictional-wide measure, identify the trash assessment method(s) used to demonstrate on-going reductions, summarize the results of the assessment(s), and estimate the associated reduction of trash within your jurisdictional area.

In FY 14/15, the City focused efforts in TMA #2, per the City's Long Term Trash Load Reduction Plan, which specifies that each year the City will focus on a specific TMA to reach full compliance within the required term.

Control Measure	Summary Description of Control Measure & Dominant Trash Sources and Types	Assessment Method(s)	Summary of Assessment Results To-date	Estimated % Trash Reduced
Single-use Plastic Bag Ordinance or Policy	No changes made since FY 13/14. See FY 13/14 Annual report for this information, already reported.	No changes made since FY 13/14.	See FY 13/14 Annual report for this information, already reported.	
Expanded Polystyrene Food Service Ware Ordinance or Policy	No changes made since FY 13/14.	See FY 13/14 Annual report for this information, already reported.	No changes made since FY 13/14. See FY 13/14 Annual report for this information, already reported.	
Other Source Control Actions with sufficient documentation and supporting assessment	No changes made since FY 13/14.	See FY 13/14 Annual report for this information, already reported.	No changes made since FY 13/14. See FY 13/14 Annual report for this information, already reported.	

C.10.d ► PART A - Trash Control Measure Implementation and Assessment (Jurisdictional-wide Actions)

No changes made to-date. See FY 13/14 Annual report for this information, already reported. In FY 14/15, the City focused efforts in TMA #2, per the City's Long Term Trash Load Reduction Plan, which specifies that each year the City will focus on a specific TMA to reach full compliance within the required term.

Control Measure	Summary Description of Control Measure & Dominant Trash Sources and Types	Assessment Method(s)	Summary of Assessment Results To-date	Estimated % Trash Reduced
No changes made to	date. See FY 13/14 Annual report for this information, already reported.	No changes made to No changes made to No changes made to	date. See FY 13/14 Annual report for this information, already reported.	No changes made to No changes made to No changes made to
No changes made to	date. See FY 13/14 Annual report for this information, already reported.		date. See FY 13/14 Annual report for this information, already reported.	
No changes made to	date. See FY 13/14 Annual report for this information, already reported.		date. See FY 13/14 Annual report for this information, already reported.	

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)

Complete the following trash control measure implementation and assessment summary for each primary trash management area (TMA) identified in your Long-term Plan. Include the following information:

- Identify the total jurisdictional area and the % of that area that generated very high (VH), high (H), moderate (M), or low (L) levels of trash in 2009, as depicted on trash generation maps;
- Identify the dominant trash source(s) and dominant type(s) of trash addressed or to-be addressed in the TMA;
- Provide the area currently treated by full capture devices, the quantity and type of devices installed to-date, and the % and acres of jurisdictional area in very high (VH), high (H), moderate (M), and low (L) generation categories that are currently treated by full capture devices in the TMA;
- Summarize control measures other than full capture devices implemented to-date, distinguishing between implementation that began pre- and post-MRP effective date. If not implemented in the entire TMA, describe generation category targeted and % of TMA addressed;
- Provide the acres of jurisdictional area in very high (VH), high (H), moderate (M), and low (L) generation categories in areas associated with actions other than full capture devices in the TMA;
- Describe the methods used to evaluate the effectiveness of control measures other than full capture devices, and any assessment results to-date. If the method was not implemented in the entire TMA, describe generation category targeted and % of TMA addressed.
- Provide the acres in VH, H, M or L generation categories after accounting for reduction associated with control measures other than full capture devices;
- Provide the acres in VH, H, M or L generation categories after accounting for reductions associated with ALL control measures (i.e., full capture and other actions) implemented to-date in the TMA
- Provide an estimate of the % of trash reduced in the TMA as a result of ALL control measures implemented to-date in the TMA. using the following formula:

$$\% \text{ Reduction} = 100 [(12A_{VH(2009)} + 4A_{H(2009)} + A_{M(2009)}) - (12A_{VH} + 4A_H + A_M)] / (12A_{VH2009} + 4A_{H2009} + A_{M2009})$$

where:

- $A_{VH(2009)}$ = total amount of the 2009 very high trash generation category in jurisdictional area
- $A_{H(2009)}$ = total amount of the 2009 high trash generation category in jurisdictional area
- $A_{M(2009)}$ = total amount of the 2009 moderate trash generation category in jurisdictional area
- A_{VH} = total amount of very high trash generation category in jurisdictional area in the reporting year
- A_H = total amount of high trash generation category in jurisdictional area in the reporting year
- A_M = total amount of moderate trash generation category in jurisdictional area in the reporting year
- 12 = Very High to Moderate weighing ratio
- 4 = High to Moderate weighing ratio
- 100 = fraction to percentage conversion factor

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		Area (Acres) in Each Trash Generation Category			
					VH	H	M	L
1, 3,4,5,6,7,8	No changes made to-date	No changes made to-date. See FY 13/14 Annual report for this information, already reported.	No changes made to-date. See FY 13/14 Annual report for this information, already reported.	Baseline Generation Areas (2009)				
Full Capture Devices	Area Treated by Full Trash Capture Devices (Acres)	Quantity and Type of Full Trash Capture Devices		Area Treated by Full Capture Devices				
	TMA #1	No changes made to-date. See FY 13/14 Annual report for this information, already reported. No changes made to-date. See FY 13/14 Annual report for this information, already reported.						
Actions other than Full Capture Devices	Summary Description of Other Actions Implemented in the TMA Since MRP Adoption			Area Not Treated by Full Capture Devices				
	No changes made to-date. See FY 13/14 Annual report for this information, already reported.							
	Assessment Methods for Control Measures Other than Full Capture Devices			Area after Accounting for Other Actions (based on assessment results)				
	No changes made to-date. See FY 13/14 Annual report for this information, already reported.							
	Summary of Assessment Results							
No changes made to-date. See FY 13/14 Annual report for this information, already reported.								
Area After Taking into Account Full Capture Devices AND Other Actions								
Estimated % Trash Reduction in this TMA								

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		% TMA in Each Trash Generation Category			
					VH	H	M	L
2	228	Pedestrian, vehicular & illegal dumping	Single use beverage containers; single use food packaging, single use plastic bags, household items, hazardous waste	Baseline Generation (Pre-MRP)	0%	99%	0%	1%
Area Treated by Full Trash Capture Devices (Acres)/percent of VH,H,M		Summary Descriptions of Full Trash Capture Devices (Quantity and Type)		After taking into account Full Capture Devices	0%	99%	0%	1%
Total Area (Acres)	0	See TMA #1						
% of TMA	0%							
% of VH/H/M	0%							
Summary Descriptions of Control Measures Implemented Since MRP Adoption, Other than Full Capture Devices				After taking into account All New or Enhanced (post MRP) Control Measures	3.7%	28.2%	56.7%	11.4%
During FY 14/15, the City has focused on improving street sweeping efficiency by adding street sweeping signage and enhancing enforcement by hiring two additional parking enforcement officers. Additionally, community cleanup events were focused in this TMA with special emphasis on addressing nearby temporary structures and encampments, by offering those without homes coordinated and enhanced support services. While these efforts have reduced the load of illegal dumping and litter on the streets substantially, the increasing number of residents due to the high cost of housing seems to be working against the efforts in reducing litter overall, but having a more scattered distribution for areas that are receiving a focus of litter abatement activities.								
Assessment Methods for Control Measures Other than Full Capture Devices								
Assessment methods were conducted in coordination with the SMCWPPP program and conducted in partnership with the regional assessment through EOA. For full details, see the SMC Annual Report.								
Summary of Assessment Results To-date								

<p>On-land visual assessments were conducted in this TMA in FY 14-15 and load reductions associated control measures other than full capture devices are considered to be working due to the substantial reduction in trash load for this TMA.</p>	<p>es</p>				
	<p>Estimated % Trash Reduction in TMA due to New or Enhanced</p>	<p>5%</p>			
	<p>Estimated % Trash Reduction Jurisdiction-wide due to New or Enhanced Post-MRP actions</p>	<p>50%</p>			

C.10.d ► PART C – Estimated Overall Trash Load Reduction

C.10.d ► PART C – Estimated Overall Trash Load Reduction

For Population-based Permittees, provide an estimate of the overall trash reduction percentage achieved to-date within the jurisdictional area of your municipality that generates problematic trash levels (i.e., Very High, High or Moderate trash generation). Base the estimate on the information presented in C.10.d – Parts A and B and creek/shoreline cleanups not reported in C.10.b.iii. Provide a statement regarding the confidence in the estimate and challenges and/or successes in measuring progress towards the 40% trash reduction target described in provision C.10.

Discussion of Trash Reduction Estimate:

The City has reduced the overall trash load by roughly 55% since the adoption of the MRP in 2009. This estimate is based on proactive efforts to reduce the incidence of trash flowing to the stormdrain system outfalls through the following primary efforts:

Enhanced maintenance activities and the installation of full trash capture devices;
 Reusable Bag Ordinance essentially eliminating single use plastic bags from City boundaries;
 Improved street sweeping efforts through installation of signage and enhanced enforcement ensuring street sweeping is more effective;
 Partnership in Pride Campaign with local volunteers dedicated to litter abatement and outreach distribution throughout the community, but with special focus in the TMA of significance. While the City did conduct significant on-land cleanups through the Partnership in Pride Campaign volunteer efforts, the quantity of trash/percentages are not being fully credited due to increase trash loads being seen likely due to increasing population demands. It is possible that full trash capture will be the only solution for this type of variation. Future assessments will enable the City to make a more clear determination on this—and the City will look into updating the O’Connor Pump station trash rack to meet the criteria for full-trash capture to address this issue, if ongoing enhancements do not bring fruition.

Estimated % Trash Reduction due to Jurisdictional-wide Actions	18%
Estimated % Trash Reduction due to Trash Full Capture Devices (All TMAs)	4%
Estimated % Trash Reduction due to Other Control Measures (All TMAs)	28%
SubTotal for Above Actions	50%
Estimated % Trash Reduction due to Creek/Shoreline Cleanups (All TMAs)	5%
Total Estimated % Trash Reduction in FY 13-14	55%

C.10.d Summary of Trash Reduction Actions				
<p>Guidance: Describe all trash management actions that were implemented in FY 2012-13 by your municipality to reduce trash impacting local water TMA #1 represents all full trash capture devices located in the City. During FY 14/15, the City has enhanced street sweeping and community wide cleanups in TMA #2.</p>				
Action	Description	Management Area(s) (Map ID)	Dominant Sources	Dominant Types
Management Area Specific Actions				
Full-Capture Treatment Devices	See description in section C.10.a.iii	TMA #2	Pedestrian and vehicle dominant trash sources; illegal dumping and litter, primarily.	Primarily single use packaging from fast food and/or lunch items from students; large quantity of bulky waste materials indicating inadequate trash service in the residential sector. Outreach targets all sectors.
Street Sweeping	Prior to MRP, the street sweeping program was not fully effective. There were no street sweeping signs in TMA #2 and there was no code enforcement or parking restrictions. To date, street sweeping signage and enforcement has brought a more robust street sweeping program for TMA #1. By the end of FY 15/16, this area will include street sweeping signage throughout.			
On-land Trash Cleanups	Prior to the MRP effective date there was little city-sponsored on-land cleanup activities and those activities provided by the community were not documented. To date, there are more than a dozen activities ongoing on an annual basis, resulting in better outreach to the community about littering and illegal dumping. These activities are both Permittee and volunteer-led.			
Partial-Capture Treatment Devices	The City installed bars across stormdrain inlets to prevent large items from entering the stormdrain system.			
Enhanced Storm Drain Inlet Maintenance	Prior to the MRP, there was minimal documentation and unknown frequency of the stormdrain inlet maintenance. To date, the City maintains the stormdrain inlets each twice a year. Once prior to the rainy season and once at the end of the rainy season. Additionally, particular inlets may require maintenance at more frequent intervals.			

C.10.d Summary of Trash Reduction Actions

Guidance: Describe all trash management actions that were implemented in FY 2012-13 by your municipality to reduce trash impacting local water TMA #1 represents all full trash capture devices located in the City. During FY 14/15, the City has enhanced street sweeping and community wide cleanups in TMA #2.

Action	Description	Management Area(s) (Map ID)	Dominant Sources	Dominant Types
Anti-littering and Illegal Dumping Enforcement Activities	Prior to the MRP, the City did not focus on anti-littering and illegal dumping activities unless complaint-driven. In FY 14/15, the City has worked holistically to identify the core source of this issue and is ongoing effort to eliminate the core problem: inadequate trash service for residents.			
Improved Trash Bins/Container Management	City staff has focused on reducing the duration of time containers are serviced from biweekly to weekly service.			
Creek, Channel, Shoreline Cleanups	See Outreach section C.7	TMA #2		
Area/Jurisdictional-wide Actions				
Single-Use Carryout Bag Policies	See FY 13/14 Annual Report	Citywide		
Public Education and Outreach Programs	See Outreach events C.7			

Section 11 - Provision C.11 Mercury Controls

C.11.a.i ► Mercury Recycling Efforts

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

- 1) **Promotion** (distribution of outreach in hard copy, through the City Manager's newsletter, Facebook page <https://www.facebook.com/The-City-of-East-Palo-Alto-Community-Health-and-Environment-112259492170496/timeline/?ref=hl>) of:
 - a) **Household Hazardous Waste (HHW)** programs, including promotion of HHW drop-off events within San Mateo County and local businesses including IKEA, Palo Alto Regional Water Quality Control Plant, and Home Depot that provide residents and small businesses the opportunity to drop-off of mercury-containing devices and equipment (e.g., bulbs, thermostats, thermometers and/or switches) at designated locations on specific dates, times and/or business hours.
The San Mateo County Environmental Health Department provides drop-off by appointments when residents contact them at: <http://www.cityofsanmateo.org/index.aspx?NID=161> or calling: (650) 363-4718
The Door-to-door service is another option for residents, and likely the simplest solution for disposal of mercury containing products. They can call to schedule a pick up at: <http://www.recycleworks.org/toxics/> or atyourdoor@wm.com via email or by calling 800-HHW-PKUP (800-449-7587)
 - b) The Thermostat Recycling Corporation, an organization developed on behalf of the thermostat manufacturers, that recycles mercury-containing thermostats and switches generated by residents and small businesses. The HVAC industry is the largest generator of these waste streams and is the targeted audience to inform of this recycling option. The City provides outreach brochures for this program at the Permit Center, where those who are obtaining permits for new installations can obtain this information..
- 2) **Facilitation/Organization** of HHW drop-off events conducted by the San Mateo County Environmental Health HHW program has been conducted within the City, with assistance by the City staff, but had very low participation. A second such event was scheduled for November 2015, but cancelled due to low participation. An alternative outreach campaign is being created to spread via word of mouth and other communication channels. The transient nature of many tenants in East Palo Alto makes these appointment-based drop off events challenging to have substantial participation.

C.11.a.ii ► Mercury Collection

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

Please refer to the FY 14-15 Countywide Program Annual Report for an estimate of the mass of mercury collected through collection and recycling efforts in the Countywide Program area.

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

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

Summary

[A summary of countywide Program and regional accomplishments for these sub-provisions are included within the C.11 Mercury Controls section of Program's FY 14-15 Annual Report, Integrated Monitoring Report](#)

Section 12 - Provision C.12 PCBs Controls

C.12.a.ii,iii ▶ Ongoing Training

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

Description:

[The City of East Palo Alto contracts with the San Mateo County Environmental Health Department for industrial inspections , and the Palo Alto Regional Water Quality Control Plant also inspects those with sanitary connections. PCBs and PCBs-containing equipment are inspected as part of the industrial inspections ; to date, no PCBs or PCBs-containing equipment have been identified . The City continues to obtain training through San Mateo County Stormwater Committee Commercial and Industrial Inspections program to identify these types of equipment as older buildings that have not been fully functional are starting to be rehabilitated for use by new companies. See the FY 12-13 Program Annual Report for a description of training provided countywide and/or regionally.](#)

C.12.b ▶ Conduct Pilot Projects to Evaluate Managing PCB-Containing Materials and Wastes during Building Demolition and Renovation Activities

C.12.c ▶ Pilot Projects to Investigate and Abate On-land Locations with Elevated PCB Concentrations

C.12.d ▶ Conduct Pilot Projects to Evaluate and Enhance Municipal Sediment Removal and Management Practices

C.12.e ▶ Conduct Pilot Projects to Evaluate On-Site Stormwater Treatment via Retrofit

C.12.f ▶ Diversion of Dry Weather and First Flush Flows to POTWs

C.12.g ▶ Monitor Stormwater PCB Pollutant Loads and Loads Reduced

C.12.h ▶ Fate and Transport Study of PCBs In Urban Runoff

C.12.i ▶ Development of a Risk Reduction Program Implemented Throughout the Region

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

Summary

[A summary of countywide Program and regional accomplishments for these sub-provisions are included within the C.12 PCB Controls section of Program's FY 14-15 Annual Report, Integrated Monitoring Report.](#)

Section 13 - Provision C.13 Copper Controls

C.13.a.iii.(2) ▶ Training, Permitting and Enforcement Activities

(FY 11-12 Annual Report and each Annual Report thereafter) Provide summaries of activities implemented to manage waste generated from cleaning and treating of copper architectural features, including copper roofs, during construction and post-construction including. :

- Development of BMPs on how to manage the water during and post construction
- Requiring the use of appropriate BMPs when issuing building permits
- Educating installers and operators on appropriate BMPs
- Enforcement actions taken again noncompliance

The City of East Palo Alto has participated in the development of materials geared at addressing copper architectural features, however, there is rarely an interest in installing these features in East Palo Alto. Should this become a problem, the City would require the use of appropriate BMPs when inspections are conducted by the Chief Building Official, and/or stormwater compliance inspector.

C.13.d.iii ▶ Industrial Sources Copper Reduction Results

Based upon inspection activities conducted under Provision C.4, highlight copper reduction results achieved among the facilities identified as potential users or sources of copper, facilities inspected, and BMPs addressed.

Summary

There have been no facilities identified as potential users or sources of copper in East Palo Alto. All industrial facilities that conduct metal work are inspected by the San Mateo County Environmental Health Department and the Palo Alto Regional Water Quality Control Plant., providing outreach regarding copper controls. One potential source, albeit minor, is the Home Depot in waste of pressure treated wood, with some amount of copper inserted in the process of pressure treating the wood, which has been disposed of in the regular trash system. This material is being separated out for specialty recycling.

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

Note: There are no reporting requirements in the FY 14-15 Annual Report for Section C.14.

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

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

Is your agency a water purveyor? **Yes** **No**

If **No**, skip to C.15.b.vi.(2):

If **Yes**, Complete the attached reporting tables or attach your own table with the same information. Provide any clarifying comments below.

Comments:

Ongoing efforts to ensure water is appropriately monitored during planned and unplanned discharges. Flushing is an ongoing issue. In particular, an incident occurred in March 2015 at the San Antonio Reservoir (SFPUC) which resulted in an untreated water distribution, which required substantial flushing to ensure the water was not consumed.

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

Provide implementation summaries of the required BMPs to promote measures that minimize runoff and pollutant loading from excess irrigation. Generally the categories are:

- Promote conservation programs
- Promote outreach for less toxic pest control and landscape management
- Promote use of drought tolerant and native vegetation
- Promote outreach messages to encourage appropriate watering/irrigation practices
- Implement Illicit Discharge Enforcement Response Plan for ongoing, large volume landscape irrigation runoff.

Summary:

The City of East Palo Alto is a water purveyor, required to meet stringent drought mandates from the Emergency Drought regulations. The City has reduced residential water use by over 12%, down to 39 gallons per person, per day, the lowest in the Bay Area. While the City promotes the replacement of water intensive turf, property owners and tenants have been replacing these vegetation voluntarily, in response to increased water costs—the City of East Palo Alto has a very price-sensitive market. Due to the lack of potable water for new development, changes in land use (increased intensity) requires that the developer/property owner has no positive increase in water consumption prior to being approved for new construction, with the exception of secondary units. The City’s conservation program includes the distribution of free low-flow shower heads, shut-off nozzles for hoses, color tablets for toilets to detect leaks, and rebates for high efficiency washing machines. The City requires all runoff irrigation is addressed immediately, with an escalating enforcement response for those who continue to have irrigation runoff, along with a two-day a week watering schedule. The City has intentions to implement illicit discharge enforcement plan should large volume irrigation runoff become an ongoing issue.

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System										
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity ³⁹ (NTU)	Implemented BMPs & Corrective Actions
2770 Hunter St	Water main/hydrant flushing	Storm drain	7/30/14	1100-1103	600	288000	0.02	9.4	6	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
2724 Xavier St	Water main/hydrant flushing	Storm drain	7/30/14	1110-1120	2500	360000	0.01	9.6	15	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
Westminster Dr	Water main/hydrant flushing	Storm drain	8/14/14	1040-1045	1000	288000	0.01	9.8	2	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
2251 Capitol	Water main/hydrant flushing	Storm drain	8/14/14	1310-1315	1250	360000	0.02	9.6	12	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
650 Runnymede	Water main/hydrant flushing	Storm drain	8/14/14	1325-1328	900	432000	0.03	9.4	20	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
Runnymede St X University Ave	Water main/hydrant flushing	Storm drain	8/14/14	1340-1345	1500	432000	0.02	9.3	15	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
Bay Rd X Pulgas Ave	Fire Flow Test	Storm drain	8/22/14	1140-1142	2200	1584000	0.01	9.3	6.8	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
Bay Rd X Tara St	Water main/hydrant flushing	Storm drain	8/22/14	1150-1155	300	432000	0.02	9.7	7.7	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
500 Weeks St	Water main flushing	Storm drain	9/18/14	0905-0920	1500	144000	0.14	8.8	35.4	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet

³⁹ Monitor the receiving water for turbidity if necessary and feasible. Include data in this column if available.

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System										
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity ⁴⁰ (NTU)	Implemented BMPs & Corrective Actions
940 Clarke Ct	Water main/hydrant flushing	Storm drain	9/25/14	1110-1120	1500	216000	0.08	9.2	18.4	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Carole Ct X Weeks St	Water main/hydrant flushing	Storm drain	9/26/14	1340-1345	1250	360000	0.04	9.3	27.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Tuscany Ct X Runnymede St	Water main/hydrant flushing	Storm drain	9/26/14	1455-1500	1750	504000	0.06	9.3	9.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2288 Tuscany Ct	Water main/hydrant flushing	Storm drain	9/26/14	1445-1450	1250	360000	0.04	9.4	8.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2309 Vines Ct	Water main/hydrant flushing	Storm drain	9/26/14	1505-1510	1750	504000	0.06	9.2	14.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Gloria Way X Bay Rd	Hydrant flushing for well sampling	Storm drain	10/08/14	1000-1015	1000	288000	0	9.6	2.63	Filter cloth & gravel bags around drain inlets
350 Demeter St	Fire flow test	Storm drain	10/17/14	0950-0955	5650	1627200	0.05	9.8	34.1	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Bay Rd X Pulgas Ave	Fire flow test	Storm drain	10/17/14	1040-1042	2260	1627200	0.01	9.8	30.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Donohoe St X Cooley Ave	Fire flow test	Storm drain	10/17/14	1350-1355	5475	1576800	0.08	9.1	44.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

⁴⁰ Monitor the receiving water for turbidity if necessary and feasible. Include data in this column if available.

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System										
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity ⁴¹ (NTU)	Implemented BMPs & Corrective Actions
2033 Pulgas Ave	Fire flow test	Storm drain	10/17/14	1100-1108	8760	1576800	0.08	9.5	45.7	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
O'Connor St X Euclid Ave	Fire flow test	Storm drain	10/17/14	1330-1335	5300	1526400	0.04	9.6	26.8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Camellia Dr X Pulgas Ave	Fire flow test	Storm drain	10/17/14	1115-1120	5300	1526400	0.06	8.9	74.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
East end of Weeks St	Fire flow test	Storm drain	10/17/14	0911-0915	4240	1526400	0.02	9.8	20.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Rutgers St X Fordham St	Water main/hydrant flushing	Storm drain	10/18/14	0900-0930	3000	144000	0.07	9.3	59	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Fordham St X Stevens Ave	Water main/hydrant flushing	Storm drain	10/18/14	0940-1010	3000	144000	0.06	8.6	47	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Illinois St X Fordham St	Water main/hydrant flushing	Storm drain	10/18/14	1020-1050	4500	216000	0.07	9.4	17.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Illinois St X Stevens Ave	Water main/hydrant flushing	Storm drain	10/18/14	1100-1130	3000	144000	0.18	9.5	11.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Illinois St X Purdue Ave	Water main/hydrant flushing	Storm drain	10/23/14	1000-1020	2000	144000	0.06	9.1	44.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

⁴¹ Monitor the receiving water for turbidity if necessary and feasible. Include data in this column if available.

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System

Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity ⁴² (NTU)	Implemented BMPs & Corrective Actions
Ralmar Ave X Albern St	Water main/hydrant flushing	Storm drain	10/23/14	1100-1115	2250	216000	0.02	9.1	23.1	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Menalto Ave X Bay Rd	Water main/hydrant flushing	Storm drain	10/24/14	1425-1440	1500	144000	0.02	9.3	73.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Menalto Ave X Holland St	Water main/hydrant flushing	Storm drain	10/24/14	1405-1420	1500	144000	0.06	9.2	90.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
E. Bayshore Rd X Menalto Ave	Water main/hydrant flushing	Storm drain	10/24/14	1330-1345	2250	216000	0.04	9.3	18	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
160 Jasmine Way	Water main/hydrant flushing	Storm drain	10/26/14	1120-1130	1000	144000	0.05	9.0	55	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
933 Clarke Ct	Water main/blowoff flushing	Storm drain	9/25/14	1130-1133	750	216000	0.06	9.3	9.83	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
940 Clarke Ct	Water main/blowoff flushing	Storm drain	9/25/14	1045-1055	1000	144000	0.06	9.2	39.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
949 Clarke Ct	Water main/blowoff flushing	Storm drain	9/25/14	1122-1125	750	216000	0.04	9.2	8.48	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
785 Carole Ct	Water main/blowoff flushing	Storm drain	9/26/14	1328-1324	1500	216000	0.08	9.4	13.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

⁴² Monitor the receiving water for turbidity if necessary and feasible. Include data in this column if available.

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System

Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity ⁴³ (NTU)	Implemented BMPs & Corrective Actions
809 Paul Robeson Ct	Water main/blowoff flushing	Storm drain	9/26/14	1400-1405	1500	432000	0.03	9.3	37.8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
819 Jamie Ln	Water main/blowoff flushing	Storm drain	9/26/14	1414-1420	1500	360000	0.05	9.4	39.8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2278 Tuscany Ct	Water main/blowoff flushing	Storm drain	9/26/14	1430-1435	1500	432000	0.06	9.2	23.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2151 Euclid Ave	Water main/hydrant flushing	Storm drain	3/15/15	1250-1300	4000	576000	0.02	9.2	8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Manhattan Ave X Woodland Ave	Water main/hydrant flushing	Storm drain	3/15/15	1315-1325	2500	360000	0.03	9.6	15	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1997 Manhattan Ave	Water main/hydrant flushing	Storm drain	3/15/15	1305-1315	2500	360000	0.03	9.5	12	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Pulgas Ave X Weeks St	Water main/hydrant flushing	Storm drain	3/20/15	1505-1515	2000	288000	0.14	9.63	21.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Pulgas Ave X Bay Rd	Water main/hydrant flushing	Storm drain	3/22/13	1010-1020	2000	288000	0.05	9.2	45.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2555 Pulgas Ave	Water main/hydrant flushing	Storm drain	3/22/15	1030-1040	2500	360000	0.11	9.6	55.3	Dechlorinating tablets, filter cloth & gravel bags

⁴³ Monitor the receiving water for turbidity if necessary and feasible. Include data in this column if available.

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System

Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity ⁴³ (NTU)	Implemented BMPs & Corrective Actions
										around drain inlets

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System

Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity ⁴⁴ (NTU)	Implemented BMPs & Corrective Actions
150 Tara St	Water main/hydrant flushing	Storm drain	3/22/15	1110-1115	1000	288000	0.11	9.4	16.8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1861 Bay Rd	Water main/hydrant flushing	Storm drain	3/22/15	1120-1130	2000	288000	0.06	9.4	24.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
350 Demeter St	Water main/hydrant flushing	Storm drain	3/22/15	1145-1155	2000	288000	0.07	9.5	31.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
325 Demeter St	Water main/hydrant flushing	Storm drain	3/22/15	1340-1350	2500	360000	0.06	9.2	30.4	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
219 Demeter St	Water main/hydrant flushing	Storm drain	3/22/15	1355-1405	1500	216000	0.08	9.3	21.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
141 Demeter St	Water main/hydrant flushing	Storm drain	3/22/15	1410-1420	2000	288000	0.11	9.0	33.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Bay Rd X Demeter St	Water main/hydrant flushing	Storm drain	3/22/15	1422-1430	1200	216000	0.04	9.4	21.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

⁴⁴ Monitor the receiving water for turbidity if necessary and feasible. Include data in this column if available.

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System										
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity⁴⁴ (NTU)	Implemented BMPs & Corrective Actions
1836 Bay Rd	Water main/hydrant flushing	Storm drain	3/22/15	1435-1445	2000	288000	0.03	9.0	13.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Tea Ct	Water main/hydrant flushing	Storm drain	3/27/15	0940-0950	2500	360000	0.16	9.6	21	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Runnymede Ct	Water main/hydrant flushing	Storm drain	3/28/15	0936-0956	5000	360000	0.08	9.4	46	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Veronica Ct	Water main/hydrant flushing	Storm drain	3/28/15	1005-1015	2000	288000	0.24	9.3	30.8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Mandela Ct	Water main/hydrant flushing	Storm drain	3/28/15	1116-1124	2000	360000	0.34	9.2	28.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
877-C Donohoe St	Water main/hydrant flushing	Storm drain	3/28/15	1140-1150	2000	288000	0.19	9.1	39.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Verbena Dr X Gardenia Wy	Water main/hydrant flushing	Storm drain	3/28/15	1415-1425	1000	144000	0.05	9.2	44	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Albani St X Laurel Ave	Water main/hydrant flushing	Storm drain	3/28/15	1800-1810	1000	144000	0.10	9.0	63	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Bell St X University Ave	Water main/hydrant flushing	Storm drain	4/26/15	1420-1430	1500	216000	0.09	9.6	22	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Wisteria Dr X Aster Wy	Water main/hydrant flushing	Storm drain	4/30/15	1420-1440	3000	216000	0.12	9.3	25.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System										
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity ⁴⁴ (NTU)	Implemented BMPs & Corrective Actions
1861 Bay Rd	Fire flow test	Storm drain	1/10/15	1200-1205	5650	1627200	0.25	9.2	63	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Runnymede St X Avelar St	Fire flow test	Storm drain	1/28/15	1000-1005	5650	1627200	0.05	9.2	46	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
325 Demeter St	Fire flow test	Storm drain	1/29/15	1400-1402	2060	1483200	0.03	9.3	120	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
837 Donohoe St	Fire flow test	Storm drain	2/11/15	1000-1005	2120	1526400	0.05	9.2	46.7	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Cooley Ave X Bell St	Fire flow test	Storm drain	3/13/15	0940-0942	2040	1468800	0.05	9.2	46	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1877 Bay Rd	Fire flow test	Storm drain	5/16/15	1040-1043	3570	1713600	0.05	9.3	23	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2396 University Ave	Fire flow test	Storm drain	6/12/15	1500-1502	2000	1440000	0.36	8.99	92.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1261 Runnymede Ct	Water main/blowoff flushing	Storm drain	3/28/15	0950-1000	1000	144000	.04	9.3	35	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1118 Mandela Ct	Water main/blowoff flushing	Storm drain	3/28/15	1020-1030	1000	144000	0.06	9	39	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1035 Ruth Ct	Water main/blowoff flushing	Storm drain	3/28/15	1032-1041	900	144000	0.32	9	25.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System										
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity⁴⁴ (NTU)	Implemented BMPs & Corrective Actions
2278 Tuscany Ct	Water main/blowoff flushing	Storm drain	3/28/15	1045-1055	1500	216000	0.02	9.1	20.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Salas Ct	Water main/blowoff flushing	Storm drain	3/28/15	1105-1115	1000	144000	0.22	9.3	30.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
841 Donohoe St	Water main/blowoff flushing	Storm drain	3/28/15	1120-1130	1000	144000	0.30	9	29.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

C.15.b.iii.(2) ► Unplanned Discharges of the Potable Water System ⁴⁵														
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Discharge Duration (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L) ⁴⁶	pH (standard units) ⁵²	Discharge Turbidity (Visual) ⁵²	Implemented BMPs & Corrective Actions	Time of discharge discovery	Regulatory Agency Notification Time ⁴⁷	Inspector arrival time	Responding crew arrival time
2833 Georgetown St	Main leak	Storm Drain	7/12/14	1400-1430	1500	72000				Closed valves, filter cloth, gravel bags around DI	1400		1430	1430
2450 Ralmar Ave	Hydrant knockdown	School soccer field	9/7/14	1930-2030	30000	720000				Closed valves	1930		2000	2000
1938 Capitol Ave	Service leak	Storm drain	10/26/14	0730-0830	300	7200				Closed valves, filter cloth, gravel bags around DI	0730		0800	0800
152 Jasmine Way	Main leak	Storm drain	10/26/14	0015-0145	27000	432000				Closed valves, filter cloth, gravel bags around DI	0015		0045	0045
10 Lita Lane	Service leak	Large empty lot/dirt field	1/14/15	0845-0845	7200	7200					0845		0945	0945
2792 Hunter St	Main leak	Storm drain	1/18/15	0700-0800	6000	144000				Closed valves, filter cloth, gravel bags around DI	0700		0745	0745
Temple Court	Main leak	Storm drain	1/16/15	1430-1500	6000	288000				Closed valves, filter cloth, gravel bags around DI	1430		1430	1430
Temple Court	Main leak	Storm drain	1/17/15	1130-1135	2000	576000				Closed valves, filter cloth, gravel bags around DI	1130		1130	1130
Temple Court	Main leak	Storm drain	1/17/15	1420-1430	2000	288000				Closed valves,	1420		1420	1420

⁴⁵ This table contains all of the unplanned discharges that occurred in this FY.

⁴⁶ Monitoring data is only required for 10% of the unplanned discharges. If you monitored more than 10% of your unplanned discharges, report all of the data collected.

⁴⁷ Notification to Water Board staff is required for unplanned discharges where the chlorine residual is >0.05 mg/L and total volume is ≥ 50,000 gallons. Notification to State Office of Emergency Services is required after becoming aware of aquatic impacts as a result of unplanned discharge or when the discharge might endanger or compromise public health and safety.

C.15.b.iii.(2) ► Unplanned Discharges of the Potable Water System ⁴⁵														
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Discharge Duration (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L) ⁴⁶	pH (standard units) ⁵²	Discharge Turbidity (Visual) ⁵²	Implemented BMPs & Corrective Actions	Time of discharge discovery	Regulatory Agency Notification Time ⁴⁷	Inspector arrival time	Responding crew arrival time
										filter cloth, gravel bags around DI				
Alberni St X Menalto Ave	Main leak	Storm drain	3/29/14	1000-1100	12000	288000				Closed valves, filter cloth, gravel bags around DI	1000		1030	1030
Gardenia Wy X Verbena Dr	Main leak	Storm drain	3/29/14	0900-1000	48000	1152000				Closed valves, filter cloth, gravel bags around DI	0900		0930	0930
Larkspur Dr X Sage St	Main leak	Storm drain	4/17/14	1000-1100	18000	432000	0.06	9.1	69.3	Closed valves, filter cloth, gravel bags around DI	1000		1030	1030
Circle Dr X Scofield Ave	Main leak	Storm drain	4/17-4/18/14	1400-1400	14400	14400	0.05	9.1	22	Closed valves, filter cloth, gravel bags around DI	1400		1430	1430
1215 Laurel Ave	Main leak	Storm drain	4/17/14	1030-1050	6000	432000	0.09	9.3	49	Closed valves, filter cloth, gravel bags around DI	1030		1050	1050
Lita Lane	Service leak	Large empty dirt lot/field	4/17/14	0900-1700	2400	7200					0900		0915	0915

C.15.b.iii.(2) ► Unplanned Discharges of the Potable Water System ⁴⁸														
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Discharge Duration (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L) ⁴⁹	pH (standard units) ⁵²	Discharge Turbidity (Visual) ⁵²	Implemented BMPs & Corrective Actions	Time of discharge discovery	Regulatory Agency Notification Time ⁵⁰	Inspector arrival time	Responding crew arrival time
2550 Annapolis Dr	Main leak	Storm drain	5/10/14	0650-0850	1200	14400				Closed valves, filter cloth, gravel bags around DI	0650		0730	0730
2543 Fordham St	Main leak	Storm drain	5/14/14	2200-2330	9000	14400				Closed valves, filter cloth, gravel bags around DI	2200		2300	2300
375 Donohoe St	Service leak	Storm drain	5/25-5/28/14	1800-1400	4080	1440	0.25	9.2	18	Closed valves, filter cloth, gravel bags around DI	1800		1900	1900
35 Buchanan Ct	Meter leak	Park strip	5/28/14	Unknown	Unknown	120					0800		0815	0815
2154 University Ave	Hydrant knockdown	Storm drain	3/1/14	1050-1110	10000	720000	0.15	9.4	40	Closed valves, filter cloth, gravel bags around DI	1050		1100	1100
Myrtle Ave X Pulgas Ave	Hydrant knockdown	Storm drain	3/15/14	1440-1500	20000	144000					1440		1500	1500

⁴⁸ This table contains all of the unplanned discharges that occurred in this FY.

⁴⁹ Monitoring data is only required for 10% of the unplanned discharges. If you monitored more than 10% of your unplanned discharges, report all of the data collected.

⁵⁰ Notification to Water Board staff is required for unplanned discharges where the chlorine residual is >0.05 mg/L and total volume is ≥ 50,000 gallons. Notification to State Office of Emergency Services is required after becoming aware of aquatic impacts as a result of unplanned discharge or when the discharge might endanger or compromise public health and safety.