

## ATTACHMENT G

### **STORM WATER POLLUTION PREVENTION PLAN (SWPPP)**

#### A. Objectives of the SWPPP:

The SWPPP has two major objectives: (a) to identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of storm water discharges and authorized non-storm water discharges from the facility; and (b) to identify and implement site-specific best management practices (BMPs) to reduce or prevent pollutants associated with storm water discharges and authorized non-storm water discharges from Hollywood Park Facility. BMPs may include a variety of pollution prevention measures and are generally categorized as non-structural BMPs (activity schedules, prohibitions of practices, maintenance procedures, and other low-cost measures) and as structural BMPs (treatment measures, run-off controls, overhead coverage.) To achieve these objectives, Hollywood Park should consider the five phase process for SWPPP development and implementation as shown in Table A.

A facility's SWPPP is a written document that shall contain a compliance activity schedule, a description of activities and pollutant sources, descriptions of BMPs, drawings, maps, and relevant copies or references of parts of other plans. The SWPPP shall be revised whenever appropriate and shall be readily available for review by facility employees or Regional Water Board inspectors.

#### B. SWPPP Requirements

##### 1. Availability

Retain the SWPPP on site or within reasonable access to the site. Hollywood Park must make it immediately available to Regional Board personnel on site or submit a copy of the SWPPP within two (2) weeks of receiving a request or, for discharges to a storm sewer system, to the municipal operator of the storm sewer system. Regional Board will maintain a copy of the SWPPP for the facility and the public may view a copy of the permittee's SWPPP at the Regional Board office. Upon receiving a request from the Regional Board for a copy of the SWPPP the permittee:

Shall provide a copy of the SWPPP to the Regional Board, as requested, within a reasonable time frame,

May contact the Regional Board to determine if the entire SWPPP is needed or if specific portions satisfy the requestor's needs,

May notify Regional Board of claims to confidential business information and/or security concerns with releasing the SWPPP to the public. The permittee shall identify the general sections of concern. Regional Board shall then coordinate with the permittee and requestor to provide such information as needed to satisfy the requestor's needs.

**TABLE A**

**FIVE PHASES FOR DEVELOPING AND IMPLEMENTING INDUSTRIAL  
STORM WATER POLLUTION PREVENTION PLANS**

**PLANNING AND ORGANIZATION**

Form pollution prevention team  
Review other plans

**ASSESSMENT PHASE**

Description of facility operation  
Develop a site map  
Inventory of materials and chemicals  
Identify potential pollutant sources  
Identify areas associated with industrial activity  
List significant leaks and spills  
List potential spill and leak areas  
Test for illicit non-storm water discharges  
Evaluate monitoring data

**BMP IDENTIFICATION PHASE**

Minimum BMPs  
Facility Specific BMPs

**IMPLEMENTATION PHASE**

Implement BMPs  
Collect and Review Records  
Train employees

**EVALUATION / MONITORING**

Conduct annual facility evaluation  
visual inspections  
Maintain/update proper records  
Review, revise, implement SWPPP

2. Planning and Organization

a. Form Pollution Prevention Team

A responsible facility official or duly authorized representative must sign the SWPPP, its significant updates, monitoring results, and all certifications required by the permit. The responsible facility official can be a vice president or higher, a general partner, or an owner of the company or facility. To delegate to a duly authorized representative, the responsible facility official must submit to Regional Board the name of the individual or a position (plant manager, superintendent, or equivalent) as the duly authorized representative having overall responsibility for environmental matters. The company official responsible for preparing, updating, and implementing the SWPPP and for compliance with the permit should be thoroughly familiar with the permit requirements.

The SWPPP will identify specific individuals (a pollution prevention team) by name or by title within the facility organization who are responsible for developing the SWPPP and assisting the plant manager in its implementation, maintenance, and modification. The activities and responsibilities of the pollution prevention team should address all aspects of the facility's SWPPP.

Other environmental management plans/permits for the facility should also be reviewed to determine their impact on storm water pollutants. Examples include any of the following plans: Federal Spill Control and Countermeasures, Hazardous Waste Reduction, Dangerous Waste and Toxics Reduction, Occupational Safety and Health Plans, and Air Pollution Control Plans.

b. Review Other Requirements and Existing Facility Plans

The SWPPP may incorporate or reference the appropriate elements of other regulatory requirements. Discharger should review all local, State, and Federal requirements that impact, complement, or are consistent with the requirements of this permit. Discharger should identify any existing facility plans that contain storm water pollutant control measures or relate to the requirements of this Permit. As example, if the facility operators is subject to Federal Spill Prevention Control and Countermeasures' requirements then, it should already have instituted a plan to control spills of certain hazardous materials. Similarly, if the facility is subject to air quality related permits and regulations may already have evaluated industrial activities that generate dust or particulates.

3. Assessment Phase

a. Description of the Facility Operation

Describe the facility activities conducted at the site and provide a general layout. Include buildings, storage of raw materials, and the movement of horses and flow of goods and materials through the facility. A process flow diagram would be helpful. Include any variations that could impact storm water including seasonal and climate-related changes in activities, particularly if the changes affect contact with storm water.

b. Site Map

The SWPPP shall include a site map. The site map shall be provided on an 8-½ x 11 inch or larger sheet and include notes, legends, and other data as appropriate to ensure that the site map is clear and understandable. If necessary, facility operators may provide the required information on multiple site maps.

The following information shall be included on the site map:

- i. The facility boundaries; the outline of all storm water drainage areas within the facility boundaries; portions of the drainage area impacted by run-on from surrounding areas; and direction of flow of each drainage area, on-site surface water bodies, and areas of soil erosion. The map shall also identify nearby water bodies (such as rivers, lakes, and ponds) and municipal storm drain inlets where the facility's storm water discharges and authorized non-storm water discharges may be received.
- ii. The location of the storm water collection and conveyance system, associated points of discharge, and direction of flow. Include any structural control measures that affect storm water discharges, authorized non-storm water discharges, and run-on. Examples of structural control measures are catch basins, berms, detention ponds, secondary containment, oil/water separators, diversion barriers, etc.
- iii. An outline of all impervious areas of the facility, including paved areas, buildings, covered storage areas, or other roofed structures.
- iv. Locations where materials are directly exposed to precipitation and the locations where significant spills or leaks may have occurred.
- v. Areas of facility activity. This shall include the locations of all storage areas and storage tanks, shipping and receiving areas, fueling areas, vehicle and equipment storage/maintenance areas,

material handling and processing areas, waste treatment and disposal areas, dust or particulate generating areas, cleaning and rinsing areas, and other areas of facility activity which are potential pollutant sources.

c. Materials Inventory

List materials with a narrative that describes materials handling practices including the following:

List of significant materials handled, treated, stored, or disposed of that can be exposed to storm water and result in storm water pollution of a significant amount. Include the location of each material that is exposed to storm water and a measure of its quantity, by volume or weight. Also include the significant materials handled during past activities.

Materials handled indoors that could be tracked outdoors by equipment or vehicles.

Explanations of how significant materials are handled, treated, stored, and disposed of to prevent pollution of storm water and how each material has or can contaminate storm water, including past activities.

A list of the pollutants that may be present in your storm water discharges.

Method( s) and location( s) of on-site storage and disposal and a list of significant past spills and leaks of toxic or hazardous pollutants.

*Note: The category of significant materials includes, but is not limited to, manure, process water, fuels; materials such as solvents, detergents, plastic pellets; hazardous substances designated under Section 101 (14) CERCLA; any chemical the facility is required to report pursuant to Section 313 of Title III of SARA; fertilizer;, pesticide;, and waste products such as ashes, slag, and sludge that have the potential to be released with storm water discharges.*

d. Identifying Areas Associated with Facility Activity

List pollutant generating activities and areas and describe their potential to be a pollutant source in a significant amount. Pollutant generating activities and areas can include:

Location of the presence and movement of horses and birds

On-site solid waste or residual treatment, storage, or disposal; material handling sites; refuse sites; and sites used for the application or disposal of process wastewaters.

Vehicle and equipment maintenance, fueling, and washing/cleaning.

Outdoor storage area(s) of materials or products, stockpile area(s), tank farms, etc.

Petroleum transfer area.

Roofs or other surfaces composed of materials that may be mobilized (eluted) by storm water, (e.g., galvanized or copper roofs).

Immediate access roads and areas where facility activity has taken place in the past and significant materials remain and are exposed to storm water.

Also check storage tanks, pipes, or pumping areas and note any leaks, spills, or staining. Is the loading and unloading of materials exposed to storm water? Do the dumpsters have a lid, or are they stored in a covered area? Verify whether the dumpsters or other disposal units have "unsealed" bottoms. Also pay attention to material handling equipment, including everything from vehicles to pallets, where raw and waste materials from industrial activities are exposed to storm water. *Note: Areas outside of Hollywood Park separate from the facility activity are excluded from permit coverage.*

e. Identify Past Spills and leaks

Update in the SWPPP the significant spills and leaks of oils and toxic or hazardous pollutants that have occurred during the three years prior to the effective date of this Permit. This list will provide additional information on the potential sources of storm water contamination. One way of identifying whether small spills and leaks are taking place is by noting areas with "residues" of a material that may pollute the storm water.

f. Non-Storm Water Discharges

Discharger shall investigate the facility to identify all non-storm water discharges and their sources. As part of this investigation, all drains (inlets and outlets) shall be evaluated to identify whether they connect to the storm drain system.

All non-storm water discharges shall be described. This shall include the source, quantity, frequency, and characteristics of the non-storm water discharges and associated drainage area.

Non-storm water discharges that contain significant quantities of pollutants or that do not meet the conditions provided in Special Conditions in the permit are prohibited (Examples of prohibited non-storm water discharges are contact and non-contact cooling water, boiler blowdown, rinse water, wash water, etc.). Non-storm water discharges that meet the conditions provided in Special Condition are authorized by

this General Permit. The SWPPP must include BMPs to prevent or reduce contact of non-storm water discharges with significant materials or equipment.

Include measures to identify and eliminate unpermitted discharges of process and domestic wastewater, and other wastewaters to storm drains or to surface waters. Process wastewater means any water directly or indirectly used in the operation of the Confined Animal Feeding Operation (CAFO) for any or all of the following: spillage or overflow from animal or poultry watering systems; washing, cleaning, or flushing pens, barns, manure pits, or other CAFO facilities; direct contact swimming, washing, or spray cooling of animals; or dust control. Process wastewater also includes any water which comes into contact with any raw materials, products, or byproducts including manure, litter, feed, or bedding.

SWPPP must include a certification by the responsible official from Hollywood Park that a test has been conducted for the presence of non-storm water discharges. Conduct the test during the dry season (July, August, and September) at all storm water discharge locations. Discharger must keep a record if unable to test or certify for the presence of non-storm water discharges because of not having access to a particular outfall, manhole, or other point of access to a final storm water discharge point.

Regional Board anticipates covering certain non-storm water discharges including discharges from fire fighting activities; fire protection system flushing, testing, and maintenance; discharges of potable water, including water line flushing provided that water line flushing water is dechlorinated; uncontaminated air conditioning or compressor condensate; irrigation drainage; uncontaminated ground water or spring water; and discharges associated with dewatering of foundations, footing drains, or utility vaults where flows are not contaminated with process materials such as solvents. The following information on these conditionally approved non-storm water discharges, except for discharges from fire fighting activities and of uncontaminated ground or spring water, must be included in the SWPPP:

- Identification and location of the discharge to the storm water collection system of each non-storm water discharge.
- Characterization of the non-storm water source, including estimated flows or flow volume, and likely pollutants, which may be present.
- Evaluation of non-storm water discharges for any chemical contamination.

- Evaluation, design, and implementation of available and reasonable best management practices to reduce or eliminate pollutants and/or flow volumes in non-storm water discharges.

g. Include a Monitoring (sampling and visual inspection) Plan

Identify who is responsible for monitoring and thoroughly describe monitoring procedures to meet permit requirements including sampling points, frequencies, methods, parameters, completing the discharge monitoring report, etc. At a minimum the monitoring plan must include:

Who conducts the sampling and visual inspections

Descriptions of all points of discharge to storm drains or to surface water and where samples will be taken and why sampling points were or were not selected at all multiple discharges

An explanation how volumes/rates of each discharge will be/are estimated considering storm duration, intensity and quantity; tributary area and slope; and permeability of pervious and impervious areas.

A record of the differences in exposure to pollutants, e.g., periodic vs. continuous; and pollutant concentrations likely in the discharge(s).

A list of the pollutant parameters (constituents) for analysis

Procedures for sample collection and handling, sending samples to the lab, and submitting the results to Regional Board

4. BMP identification Phase

Hollywood Park shall identify, describe and implement appropriate facility specific BMPs that will reduce or prevent pollutants in storm water discharges to achieve compliance with the BAT/BCT standard (for discharges from industrial areas (CAFO production areas), compliance with water quality standards, and meet the reduction goals of the pollutants of concern. These BMPs must include all of the minimum BMPs and additional facility specific BMPs as specified in the permit.

The Permit requires the implementation of best management practices to comply with state water quality standards and federal technology-based treatment requirements.

The technical basis for the selection of all storm water BMPs must be documented in the SWPPP including how storm water BMPs were selected; the pollutant removal performance expected from the BMP being selected (for treatment BMPs only); the technical bases which support the performance claims for the BMPs being selected; and an assessment of how the selected BMPs will achieve compliance with state water quality standards and the federal technology-based treatment requirements under 40 CFR part 125.3. Regional

Board expects the demonstration documentation to be based on good science and sound engineering judgment

a. Minimum BMPS

Discharger shall implement the minimum BMPs described in the permit throughout their facilities unless clearly inapplicable to the facility. If any of the minimum BMPs are not applicable to the facility, dischargers shall include a written explanation of inapplicability in their SWPPP. Discharger have the burden to prove inapplicability. Dischargers may use alternative BMPs instead of the minimum BMPs only if the dischargers provide specific justification in their SWPPP explaining why the minimum BMPs can not be implemented, and what alternative BMPs shall be implemented that will reduce or prevent pollutants in storm water discharges at least to the same degree. Dischargers have the burden to show that its alternative BMPs are at least as effective as the minimum BMPs.

b. Facility Specific BMPs

Dischargers, based upon the potential pollutant source assessment required in the permit shall identify and implement additional facility specific BMPs necessary to reduce or prevent pollutants in storm water discharges to achieve compliance with the BAT/BCT standard (for discharges from the industrial areas)..

5. Implementation Phase

Discharger shall include in the SWPPP a narrative description of each BMP implemented at the facility that includes:

- a. The type of pollutants the BMP is designed to reduce or prevent;
- b. The frequency, time(s) of day, or conditions when the BMP is scheduled for implementation;
- c. The locations within each area of activity or pollutant source where the BMP shall be implemented;
- d. Identification of the individual and/or position responsible for implementing the BMP;
- e. The procedures (including maintenance procedures) and/or instructions to implement the BMP; and
- f. The equipment and tools necessary to implement the BMP.

Include a schedule in the SWPPP for implementing additional or enhanced BMPs, which are either ordered by Regional Board or are necessary due to

facility changes or a self-inspection, within 30 days of self-determination or an Regional Board order. Modification of BMPs to reduce pollutants may also be necessary for a change in design, construction, or operation and maintenance (O&M) of any BMP, and/or if a BMP is observed to be insufficiently effective during a visual inspection. Non-capital BMPs must be completed within two (2) weeks and capital BMPs within six (6) months<sup>1</sup> after completing the implementation plan for addition or modification of BMPs.

Describe any capital improvements (e.g., detention pond, oil removal, filter, cover (roof) for exposed materials, paving, construction of outside storage buildings, overhangs, containment areas, covered fuel island with Portland cement pavement, etc.) Provide the date (s) of completion of the capital and non-capital improvements.

6. Annual Comprehensive Site Compliance Evaluation

Hollywood Park shall conduct comprehensive site compliance evaluation (evaluation) annually (December of each year). The SWPPP shall be revised, as appropriate, and the revisions implemented within 90 days of the evaluation. Evaluations shall include the following:

- a. A review of all visual observation records, inspection records, and sampling and analysis results.
- b. A visual inspection of all potential pollutant sources for evidence of, or the potential for, pollutants entering the drainage system.
- c. A review and evaluation of all BMPs (both structural and non-structural) to determine whether the BMPs are adequate, properly implemented and maintained, or whether additional BMPs are needed. The BMP evaluation shall include evaluations to determine if existing BMPs are effective at achieving adequate reductions of pollutants and if modified or new BMPs are warranted. Any proposals for revised BMPs will take into account water quality standards, discharge limitations contained in the Permit, and appropriateness of the BMP given environmental, technical, and economic factors. A visual inspection of equipment needed to implement the SWPPP, such as spill response equipment, shall be included.
- d. An evaluation report that includes, (i) identification of personnel performing the evaluation, (ii) the date(s) of the evaluation, (iii) necessary SWPPP revisions (including any proposals for modified or new BMPs), (iv) schedule, for implementing SWPPP revisions, and (v) any incidents of noncompliance and the corrective actions taken, If the above certification cannot be provided, explain in the evaluation report why the facility

---

<sup>1</sup> Unless circumstances warrant a longer period for implementation, which shall be discussed with and approved by Regional Board staff.

operator is not in compliance with this General Permit. The evaluation report shall be submitted as part of the annual report.

- e. RWQCB Staff shall be consulted regarding any proposals for modified or new BMPs made as a part of the evaluation report in advance of implementation of such modified or new BMPs.