

Summary of BASMAA MRP Enhancements
(As of January 2007)

Performance Standard (PS) or POC	Baseline Level of Implementation - summary	Potential Enhancements - summary (Supported by BASMAA)
<i>Construction Inspection Program PS</i>	<p>Overall goal is to:</p> <ol style="list-style-type: none"> 1) maintain current level of PS implementation with some enhancements; 2) ensure all municipalities are on level playing field (recognizing local differences in size/complexity) ; and 3) ensure that PS requirements are clear and enforceable by WB. <p>Contain the following key elements: legal authority, enforcement response plan/policy (ERP), inspection program, plan check, freq. of inspections, content of inspections, education and outreach program and a staff training program</p>	<p>Confirm key elements within 18 months</p> <p>ERP – modified to include: no more than three warning notices, citation and stop work order and referral to DA steps</p> <p>NOI – check as part of regular insp.</p> <p>Clarify distinction between large and small site and content of rainy season/ regular inspections</p> <p>All reporting on PS implementation as part of annual report</p>
<i>Industrial/Commercial Inspection Program PS</i>	<p>Same goals as above</p> <p>Contain the following key elements: legal authority, enforcement response plan/policy (ERP), inspection program, plan check, freq. of inspections(generally 1x in 5 yrs except where enforcement is underway and for facilities with a high potential for stormwater pollution then 1x/yr as part of prioritization of inspections), content of inspections, education and outreach program</p>	<p>Confirm key elements within 18 months</p> <p>ERP – modified to include:</p> <ul style="list-style-type: none"> • monetary penalty authority, • authority to address repeat offenders, • clarification of enforcement tiers, • clarification of maintenance of list of facilities to be inspected, • clarification of freq of inspections related to need for enforcement and potential for causing stormwater

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	and a staff training program	<p>pollution</p> <p>NOI – no special requirement to inspect other than as part of implementation of program (basically prioritization by co-permittee)</p> <p>All reporting on PS implementation as part of annual report</p>
<p><i>Illicit Discharge/Illegal Dumping (ICID), including Trash/Litter Control Program</i></p>	<p>Same Goals as above.</p> <p><u>Trash</u> - Not all stormwater programs have a specific program element that goes beyond the existing municipality programs which generally include some form of litter pick-up, free litter drop-off days at landfill, and reduced fees for low income residents.</p> <p>SCVURPPP program has a trash/litter program that includes the following elements/tasks:</p> <ul style="list-style-type: none"> • Identification and prioritization of trash problem areas 	<p>Enhancements include:</p> <ul style="list-style-type: none"> • Clarification on response authority, • Monetary penalty authority • Authority to address repeat offenders • Clarification on tiered violations • Clarification on response flow chart and response phone tree • Additional specific annual reporting requirements <p><u>Trash Enhancement</u> - New for most stormwater programs:</p> <ul style="list-style-type: none"> • Adopt an ordinance (if needed), • Identify and assess potential litter/trash high accumulation . areas/watersheds. • Identify potential management actions (BMPs) to reduce trash levels.in such locations. • Research current trash collection/control options • Identify high priority storm drain inlets within key urban areas/watersheds • Select locations for pilot projects and implement

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	<p>in urban streams and waterways and potential sources of trash present in those areas;</p> <ul style="list-style-type: none"> • Enhancement of existing municipal trash management practices or implementation new practices to address high priority trash problem areas; • Evaluation of the condition of urban streams and waterways with respect to the level of trash over time using a field monitoring program; • Utilization of outreach and community involvement programs to increase public awareness of the impact of urban activities on streams and waterways and to foster a sense of stewardship; • Evaluation of the effectiveness of trash management and education practices; and • Development and implementation of a standardized documentation and reporting mechanism for Annual Reports. 	<p>demonstration studies to assess their effectiveness and associated costs.</p> <ul style="list-style-type: none"> • Based on the evaluation of pilot projects, develop a schedule for phased implementation of appropriate trash removal/control program • Incorporate litter prevention messages in PIP outreach programs • All reporting on implementation as part of annual report
<p><i>Municipal Maintenance Activities PS</i></p>	<p>Same Goals as above.</p> <p>Current PS contain BMPs for the following major elements;</p> <ul style="list-style-type: none"> • Street sweeping w/ priority and freq.(includes measures for the selection and operation of equipment, measures to improve efficiency, disposal of sweep material, staff training and street flushing. • Street and Road repair • Sidewalk/Plaza Maintenance 	<p>Enhancements include:</p> <p>Confirm key elements within 12 months</p> <ul style="list-style-type: none"> • Additional detail on categories of sweeping priorities, clarification and standardization of freq. of street sweeping, additional reporting • Audit during life of permit • Additional clarification • Additional reporting reqts re certification

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	<ul style="list-style-type: none"> • Bridge and Structure maint. • Landscape maint. • Catch basin Inspection and Cleaning • Rural Public Works Maint. • Corporation Yards 	<ul style="list-style-type: none"> • Additional reporting reqts. and certifications • Additional reporting and implementation clarification • Inspect annually and clean as appropriate before rainy season • New pump station BMP with priority approach to define inspection and maintenance needs and new reporting requirements • This element is new for some programs
<i>Public Information and Participation (PIP) PS</i>	<p>Same Goals as above.</p> <p>Currently all programs have a PIP and/or Watershed Education Outreach program. For example, elements within these programs include: storm drain stenciling, media campaigns and relations efforts (local and regional), information phone/website, event program, watershed outreach program, education (school) program, pollutant specific program, and research effort.</p>	<p>Enhancements:</p> <ul style="list-style-type: none"> • Establish storm drain stenciling coverage goal of 90% over term of permit • Establish requirement to conduct 5 pitches per year • Establish requirement to conduct set number (sliding scale based on population) of events, and watershed outreach efforts to conduct either on an annually basis or over the term of the permit

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<i>New Development and Redevelopment (numeric sizing and source control)</i>	<p>Same Goals as above.</p> <p>Currently all programs have a numeric sizing and source control program for new development and redevelopment (except Vallejo)</p>	<p>Enhancements:</p> <ul style="list-style-type: none"> • Confirm all basic elements within 24 months (really only applies to Vallejo) • Incorporate a combined volume/flow numeric sizing criterion • Add language that allows measures that disperse and infiltrate runoff from impervious areas to be included as acceptable treatment measures. • Further specify information to be contained in annual O& M reports (prefer summary reports (transaction level of detail) on number of locations and inspections as opposed to details on each inspection for a subset of inspections) • Alternative Compliance – establish an impracticability criterion based on cost (i.e. threshold is 2% of project cost) and eliminate requirement to show impracticability of on-site treatment before allowing equivalent off-site treatment. • Modification to more closely match Water Board staff language except inclusion of finding of impracticability for use of off-site option. • Additional reporting requirement when alternate used, maintenance of full records for off-site or equivalent benefit options used.
<i>Conditionally Exempt Non-stormwater Discharges PS</i>	<p>Same Goals as above.</p> <p>Generally programs and municipalities rely on permit language and program guidance (where</p>	<p>Enhancements include:</p> <ul style="list-style-type: none"> • Confirmation that ordinances or other legal authority exist for municipality to implement program

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	available). Non-stormwater	<ul style="list-style-type: none"> • Grouped categories together • Provide numeric threshold criteria (thresholds based on current program guidance and/or Basin Plan criteria) to govern when a non-stormwater discharge is exempt • Provide summary of complaints in annual a report • Provide summary of educational material developed and distributed as part of PIP annual reporting • Provide summary of significant discharges to WB (>50,000 gals.) as part of annual report for unplanned discharges
<i>Monitoring</i>	<p>Programs encompass a variety of the following elements:</p> <ul style="list-style-type: none"> • RMP participation (all) • SWAMP participation via annual permit fee surcharge (all) • CEP participation (past five years – currently being redesigned) (all) • Status and trends in local receiving waters - SWAMP based (some) • Citizen monitoring (some) • Watershed Assessments (some) • Sediment Assessments (some) • Special Projects (some) 	<p>Enhancements (in addition to RMP and SWAMP participation) based on BASMAA monitoring priorities:</p> <ol style="list-style-type: none"> 1. RMP – Bay-wide monitoring and SWAMP – long-term 2. TMDL –POC – prioritized implementation related projects 3. Watershed Assessment – as part of separate provision 4. Other POCs 5. HMP as part of separate Perf. Standard 6. Sediment Assessment <ul style="list-style-type: none"> • Establish specific bay-wide objectives • CEP participation (past five years – currently being redesigned) (all via BASMAA coordinated with BACWA) • Status and trends in local receiving waters relying on ten year watershed rotation bases- SWAMP based protocols (all) • SWAMP participation focused on long-term trends

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		<ul style="list-style-type: none"> • Specific identification of types, frequency, interval and location – addresses Baykeeper decision (specifically includes fish, BMI, general WQ, temp., bedded sediment, water and sediment ox, chlorine, stream flow, microbial indicators, trash and stream survey type monitoring) • Possibly include list of surface water bodies to be sampled as part of status and trends monitoring • Citizen monitoring (all will encourage) • Watershed Assessments (included as separate provision separate from monitoring and specifies conduct over term of permit) • Sediment Assessments (unknown) • Special Projects (all and projects will be focused on TMDL agreed upon implementation projects) • Consistent reporting format and conduct of fifth year program based status and trends report • Electronic reporting of QA/QC'd data
<i>Copper</i>	<p>Same goals as above; in addition, copper is considered a pollutant of concern (POC) requiring special attention and enhanced control measures.</p> <p>All programs currently support and indirectly or directly participate in the brake pad partnership and engage in certain educational and outreach activities related to copper containing products and materials.</p>	<p>Enhancements largely involve increasing education and outreach and focusing PIP efforts and resources more specifically as follows.</p> <ul style="list-style-type: none"> • Conduct shelf survey on copper-containing pesticides, fungicides, algecides • Conduct targeted education and outreach on potential water quality impacts of pool and spa-related chemicals (see PIP program for further detail concerning level of implementation)

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		<ul style="list-style-type: none"> • Evaluate the extent and type of use of copper architectural features on exposed exteriors of commercial and public buildings in Bay Area via review of newly issued building permits or other means and assess the need for and type of control measures needed to address stormwater discharges from such projects
<p><i>Diazinon-Pesticide related toxicity</i></p>	<p>Same goals as above; in addition, level of implementation consistent with the RWQCB's total maximum daily load (TMDL) and related implementation plan for diazinon and pesticide-related toxicity in SF Bay.</p> <p>Most Bay Area Programs already have a pesticides control program focused on promoting use of intergrated pest management (IPM) practices</p>	<p>For those without specific pesticide provisions in their permit, the following enhancements will need to be put in place over the first 18 months. For those with pesticide/IPM programs, some fine tuning may be required to address the following:</p> <ul style="list-style-type: none"> • Adopt IPM policy or ordinance. • Conduct training in IPM for municipal staff and contractors. • Require municipal contractors to practice IPM. • Focus PIP program efforts and resources to undertake targeted eductaion to reduce reliance on pesticides that threaten water quality and minimize pesticide discharges and to provide targeted information on proper pesticide use and disposal and less toxic methods of pest prevention and control. • Through BASMAA, complete study as to water quality targets of TMDL by conclusion of 4th yearof permit.

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<i>Mercury</i>	<p>Same goals as above; in addition, level of implementation consistent with the RWQCB's total maximum daily load (TMDL) and related implementation plan for mercury in SF Bay.</p> <p>Some Bay Area Programs already have a focused control program for mercury; others may need to develop one.</p>	<p>For those without specific mercury provisions in their permit, the following enhancements will need to be put in place. For those with mercury programs, additional effort will be required to address the following:</p> <ul style="list-style-type: none"> • Encourage recycling and collection of mercury-containing equipment (including thermostats and light bulbs and switches). Estimate mass of mercury collected through the above in 4th Annual Report. • Over 4 years, conduct a site and PRP identification program (identify, rank, and map potentially key areas with significantly elevated mercury, confirm the potential presence of elevated mercury in selected highly ranked locations via visual inspections, validate through soil/sediment sampling, and provide available information on current site owner/operators and other potentially responsible parties to appropriate regulatory agencies to facilitate issuance of orders for further investigation and remediation of subject sites) • Quantify the amount of mercury-related sediment removed through street sweeping and catch basin cleaning practices, flood control projects, and other municipal stormwater program components. Estimate the amount of mercury-related sediment loading avoided via implementation of New Development and Redevelopment Control Measures and add to the above.

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		<ul style="list-style-type: none"> • By year 4, undertake a cost-benefit and feasibility study of the potential to implement further improved street sweeping (as provided in Municipal Maintenance Performance Standard) and consider additional opportunities to improve municipal sediment management practices, including as to evaluating the feasibility and cost-benefit of potential stormdrain inlet retrofits (same is required for PCBs). • Cooperate with the Bay Area Clean Water Agencies (BACWA) in performing a feasibility and cost-benefit study on the potential for reducing mercury in select stormwater discharges via diversion of certain flows to and treatment at POTWs (same is required for PCBs). • Focus PIP efforts and resources on public outreach and education efforts to address mercury risks related to consumption of impacted Bay fish • Develop an allocation of mercury load reduction for Caltrans to address
<i>PCBs</i>	<p>Same goals as above; in addition, PCBs are considered a pollutant of concern (POC) requiring special attention and enhanced control measures to the MEP; if a TMDL is adopted for PCBs, level of implementation will be consistent with implementation plan.</p> <p>A few Bay Area Programs already have a focused control program for PCBs; others may need to develop one.</p>	<p>For those without specific PCB provisions in their permit, the following enhancements will need to be put in place. For those with PCB programs, additional effort will be required to address the following:</p> <ul style="list-style-type: none"> • Train municipal construction/industrial building inspectors to identify improperly stored or dismantled PCB-containing equipment/materials

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		<ul style="list-style-type: none"> • Review available information where PCBs have previously required remediation and assess whether remediation plans addressed controlling potentially significant PCB discharges to urban runoff. Provide Regional Board with a list of sites and potentially responsible parties for further investigation and regulatory action • Quantify the amount of PCB-related sediment removed through street sweeping and catch basin cleaning practices, flood control projects, and other municipal stormwater program components. Estimate the amount of PCB-related sediment loading avoided via implementation of New Development and Redevelopment Control Measures and add to the above. • Develop an allocation of targeted PCB load reduction for Caltrans to address