STORM WATER MANAGEMENT PLAN
RWQCB Order No. 2003-0005-DWQ
NPDES General Permit No. CAS000004

for the

CALIFORNIA EXPOSITION & STATE FAIR

1600 Exposition Boulevard
Sacramento , California 95815

Prepared for:

CALIFORNIA EXPOSITI ON & STATE FAIR
1600 Exposition Boulevard
PO Box 15649
Sacramento, California 95852-1649

Prepared by:

SELLENS CONSULTING LLC
5031 Lourina Court
Fair Oaks, California 95628

May 2006

CERTIFICATION

This Storm Water Management Plan (SWMP) has been prepared for the CALIFORNIA EXPOSITION & STATE FAIR, and has been completed in compliance with the General Permit for California Regional Water Quality Control Board (RWQCB) Order No. 2003-0005-DWQ, NPDES General Permit No. CAS000004 .

I certify under penalty of law that this document and all attachments were prepared under my direction and/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 the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of 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 for knowing violations .

This SWMP for the CALIFORNIA EXPOSITION & STATE FAIR has been prepared by Sellens Consulting LLC.

Prepared By: _____ ____ _____

Michael Sellens, REA, RG — Date

SELLENS CONSULTING LLC

Approved By: _____ _____ _____

Norbert Bartosik — Date

CALIFORNIA EXPOSITION & STATE FAIR

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1.0 INTRODUCTION

On December 8, 1999, the US EPA promulgated regulations, known as Phase II of the Storm Water Regulations, requiring permits for storm water discharge from Small Municipal Separate Storm Sewer System (MS4). The California Exposition and State Fair (Cal Expo) has been designated by the Regional Water Quality Control Board – Central Valley Region (RWQCB), as a regulated MS4. Under State Water Resources Control Board (SWRCB), Water Quality Order No. 2003-0005-DWQ, NPDES General Permit No. CAS000004 (Order), Cal Expo is required to obtain coverage for the discharge of storm water.

Under the Order, Cal Expo has been given the option to apply for coverage under the General Permit, under an individual permit or as a co-permittee of an existing Medium or Large MS4 permit. Cal Expo has opted to comply with the Phase II Regulations through coverage under the General Permit. To obtain this coverage, Cal Expo is required to submit a Storm Water Management Plan (SWMP) and a Notice of Intent (NOI). This SWMP describes a comprehensive program to identify and reduce storm water discharges, with the purpose of protecting water quality by reducing the volume of potential pollutants in storm water run-off leaving Cal Expo.

It is Cal Expo's intention that the Phase II General Permit addresses the whole Cal Expo facility. A review of activities conducted throughout the facility has indicated that certain activities may be considered "Industrial Activities," and therefore would require their own Industrial Storm Water Permits. Nevertheless, any individual Industrial Storm Water Permit would be incorporated under the General Phase II Storm Water Permit.

1.1 General Permit Requirements

The General Permit contains three basic requirements:

1.1.1 Discharge Prohibition

The General Permit prohibits discharges of wastes that are prohibited under state and RWQCB plans as storm water. In addition, the General Permit prohibits discharges that cause or threaten to cause a nuisance, discharges that contain reportable concentrations of hazardous substances and any other discharges that are not allowed under a NPDES permit.

1.1.2 Effluent Limitations

The General Permit requires that the pollutants in storm water effluent be reduced. Best Management Practices (BMPs) need to be implemented that reduce pollutants in the storm water run-off to the Maximum Extent Practicable (MEP).

1.1.3 Storm Water Management Plan

The General Permit requires that a SWMP be prepared and implemented which describes BMP, measurable goals and timetables for the implementation in the six areas identified by the EPA and the RWQCB.

1.2 Industrial Storm Water Permit Conditions

A review of the activities at the Cal Expo facility indicates that an Industrial Storm Water Permit is required for the horse stable area at the eastern extent of the facility under the federal standards of 40 Code of Federal Regulations, Part 412 for Concentrated Animal Feeding Operation (CAFO). Therefore, although this area will be subject to the same Storm Water Phase II requirements as the rest of the facility, a separate Industrial Storm Water Permit will be obtained. This will result in the area being subject to the required sampling and reporting, beyond that already required under the Phase II Storm Water General Permit.

2.0 SITE LOCATION AND FACILITY DESCRIPTION

2.1 Facility Location

Cal Expo is located in Sacramento County at 1600 Exposition Boulevard in Sacramento, California (Section 66, T9N, R5E), at an elevation between 25 and 30 feet above mean sea level. The terrain is relatively flat with a very gentle grade towards the south and the American River. The location and the layout of the Cal Expo facility are shown in Figures 1 and 2, respectively.

The Cal Expo site was initially developed in 1968 and was part of a 1,000 acre parcel the state purchased for a fairground in 1948. Of the 1,000 acres, 300 acres were subsequently sold and developed (area north of Exposition Boulevard). Another 350 acres (area between America River Levee and the river) is undeveloped and is protected under the Bushy Lake Preservation Act. The current Cal Expo facility covers the remaining 350 acres. Of this area, approximately 50% consists of impervious areas, including parking lots, buildings/structures and public areas. The facility is owned by the State of California. Cal Expo is surrounded by both developed and undeveloped land. Surrounding properties include:

North: Exposition Boulevard and commercial /business and residential properties.

East: Ethan Way and commercial/business properties.

South: The Bushy Lake Preserve and the American River.

West: The Capital City Freeway (Highway Business 80) and commercial properties.

2.2 Facility Activities

The site provides a year-round, multi-use fairground facility. Cal Expo is comprised of areas both open and closed to the general public, including the fairgrounds themselves, horse racetrack and associated stable areas, livestock barns, recreation areas, e.g.. Water World (not operated by Cal Expo), concert facilities, maintenance areas and parking lots. Fairground activities throughout the year include the California State and Sacramento County Fairs, exhibits, trade shows, concerts, satellite wagering and a seasonal farmers' market. Racetrack (harness and thoroughbred racing) and stable activities are active for approximately 11 months of the year. The main livestock shows occur during the Sacramento County Fair and the California State Fair, although smaller shows do occur throughout the year. Livestock is on the facility, in certain areas, for fewer than 45 days per year. The water park (Water World) is seasonally operated by a private lessee. A farmers' market is typically operated once a week between April and November. Other activities, i.e. private parties, are conducted periodically throughout the year.

Cal Expo is an independent state agency, governed by the Food and Agriculture Code. It is self-sufficient and receives no government funding. Activities at Cal Expo

are reported to have an economic impact on the local economy of approximately $250 million. There is a permanent staff of approximately 100 at the facility. Temporary staff is employed for the State Fair that increases the number of total employees, for that period to approximately 2,000. The annual attendance at Cal Expo is approximately 2,500,000 people, of which approximately 1,000,000 attend during the California State Fair in August of each year.

2.3 Local Climate

The climate is considered mild, with hot, dry summers and moderate wet winters. Average temperatures range from 80 degrees Fahrenheit (F) in summer to 45 degrees F in winter, with temperature extremes of 115 degrees F in summer and 18 degrees F in winter. Annual precipitation is 18 inches, with over 80% of precipitation falling between November and March.

2.4 Surface Water and Groundwater

There are no natural surface water bodies present at the facility. However, there are a number of man-made water features (e.g. fountains and ponds) on the Cal Expo property. The largest of the man-made features is the lake within the infield of the racetrack. A lagoon-like feature is believed to have been present in the central area of the property prior to its development. Although there are no natural surface water features on the Cal Expo property, a number of surface water features are present in the areas adjacent to the facility. These include the American River, its levee and the flood plain directly south of the site. This includes Bushy Lake, a man-made and maintained wetland on the flood plain. To the east of Cal Expo are two drainage ditches, Chicken Ranch Slough and Strong Ranch Slough that drain the northeast Sacramento area.

There is one groundwater monitoring well at Cal Expo, located near the West Gate in Parking Lot A at the west end of the facility. Historical groundwater levels in this well have ranged between 12 feet and 22 feet below ground surface (bgs). Therefore, due to changes in elevation it is likely that groundwater across the site ranges between five feet and 30 feet bgs, being dependant on the locations within Cal Expo, the time of year and the level of the American River. It is also believed that the general groundwater flow is in a southerly direction, towards the river. There are six groundwater extraction wells on the facility. These wells draw water from depths between 88 and 145 feet bgs. The annual volume of groundwater extracted is 340 million gallons per year.

2.5 Storm Water and Surface Run-Off Drainage System

Storm water drainage in the paved areas of Cal Expo is controlled by two storm water drain systems. The main system, into which the majority of the facility's storm water drains, runs east-west throughout the complete width of Cal Expo. This system consists of a 42-inch storm drain that bisects the stable area on the east side of the facility, runs under the Racetrack and Grandstand, enlarges to a 54-inch pipe and collects storm water from the rest of the Cal Expo property. Into this main line numerous laterals

run from both the north and the south, throughout its whole length. A map showing the main line and the known laterals is presented in Figure 3. A second storm water system drains the paved parking lots adjacent to Exposition Boulevard on the north side of the facility. Storm water from the parking lots drain into a storm system, which also collects the storm water from the area on the north side of Exposition Boulevard. Both storm water lines flow to a city-owned pump station located on the levee in the southwest corner of Cal Expo, adjacent to Highway Business 80.

There is no known surface water runoff or drainage ditches in the main Cal Expo developed area into which storm water and pavement wash-down water would enter and exit the facility. It is believed that that the majority of the sites' surface water drains into the two storm water systems, discussed above. However, some surface water from the west end of the facility and the West Parking Lot does drain onto the unpaved area at the western edge of Cal Expo.

3.0 POTENTIAL SOURCES OF POLLUTION

In a review of areas and activities conducted throughout the Cal Expo facility, a number of sources of potential pollutants of concern have been identified. These activities and sources, and the potential pollutants of concern, are described in Table 1. It should be noted that these activities and sources are not facility wide, and may not be a potential concern at all times. Also, as the SWMP is implemented, additional areas and activities of concern may be identified and will be included in future submittals.

4.0 STORM WATER MANAGEMENT PLAN

4.1 General Requirements

This SWMP has been prepared to meet the requirements of the General Permit. It is Cal Expo's intention to comply with all permit requirements within five years of the permit being issued. This SWMP describes how problem areas will be identified and how any pollutants that do or may enter the storm water system will be controlled by BMPs that address the six Minimum Control Measures (MCMs) specified in the General Permit. The six MCMs are as follows:

1. **Public Education and Outreach**: Ensure greater public support and knowledge of storm water issues in the implementation of this and any other SWMP.

2. **Public Participation and Involvement**: Provide the public, tenants and facility employees with a way to contribute an active role in the development of better storm water management and become more informed on storm water issues.

3. **Illicit Discharge Detection and Elimination**: Intended to minimize discharges into the storm water system that are not storm water, and reduce and eliminate pollutants entering the storm water system and any receiving waters, i.e. American River.

4. **Construction Site Runoff Control**: Minimize polluted storm water from construction activities. At Cal Expo, this will also include surface run-off associated with facility activities.

5. **Post-Construction Run-Off Control**: Minimize impact to storm water caused by development and redevelopment. Planning and design to minimize pollutants in any run-off.

6. **Pollution Prevention/Good Housekeeping**: Reduction in the volume and type of storm water and surface run-off that enters the storm water system in the operation and maintenance of the facility's operations.

These MCMs will be obtained by the implementation of BMPs. Each BMP has specific measurable goals and a timetable for implementation to assist in the measuring of the program's effectiveness. However, it should be noted that full implementation of any BMP will be dependent on the problems and concerns identified and available funding.

The BMPs are common sense methods for controlling, preventing, reducing, or eliminating pollutants in any surface water run-off which enters the storm water system. There are basically two types of BMPs:

Source Control BMPs: Prevention or minimization of pollutants that are introduced into the run-off. These would include such elements as dry sweeping of paved areas and the education of the public and Cal Expo employees on disposal practices.

Physical Control BMPs: Removal of the pollutants from any surface runoff (i.e. sediment filter) and collecting run-off and transferring to the sanitary sewer system.

Appendix A of this Storm Water General Permit Application describes the six MCMs and the actions that Cal Expo is proposing for each of them, along with the Measurable Goals for the MCMs.

4.2 Storm Water Plan Management

The implementation of this SWMP and the resulting management will be overseen by Cal Expo maintenance department, with ultimate responsibility belonging to the Chief of the Plant Operations. In their roles they will designate individuals to oversee certain aspects of the SWMP and monitor activities at the facility, e.g. construction. These personnel will be responsible for the overseeing of contractors, vendors, etc. In addition, Cal Expo may retain non-Cal Expo personnel and organizations to oversee storm water related issues at staff trainings and during special events.

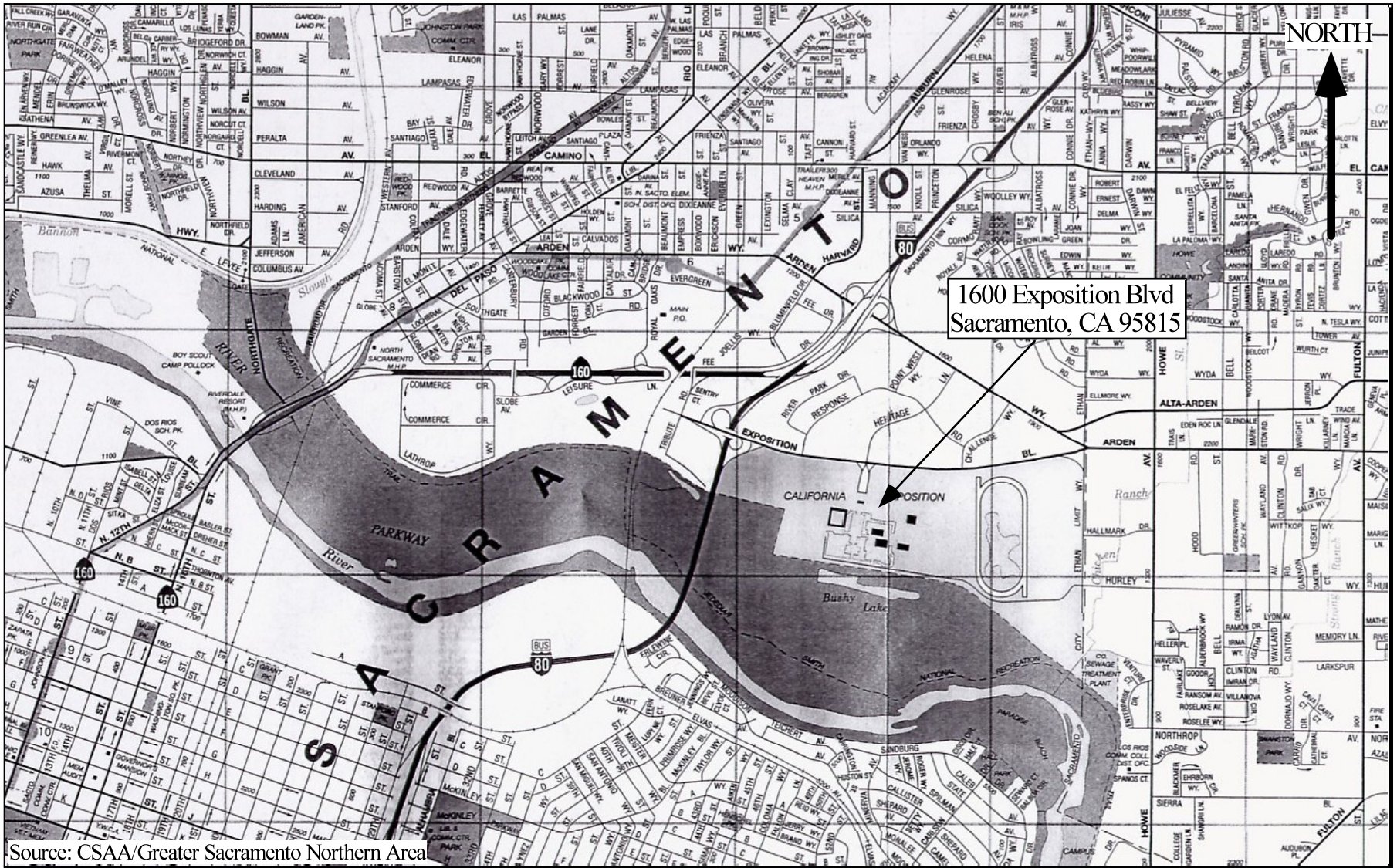
4.3 Storm Water Program Enforcement

All employees, tenants, operators and vendors will be informed of Cal Expo's SWMP, with compliance issues incorporated into new contracts issued to operate at the facility. Non-compliance with the contract terms will result in warnings, penalties and potential termination of a contract.

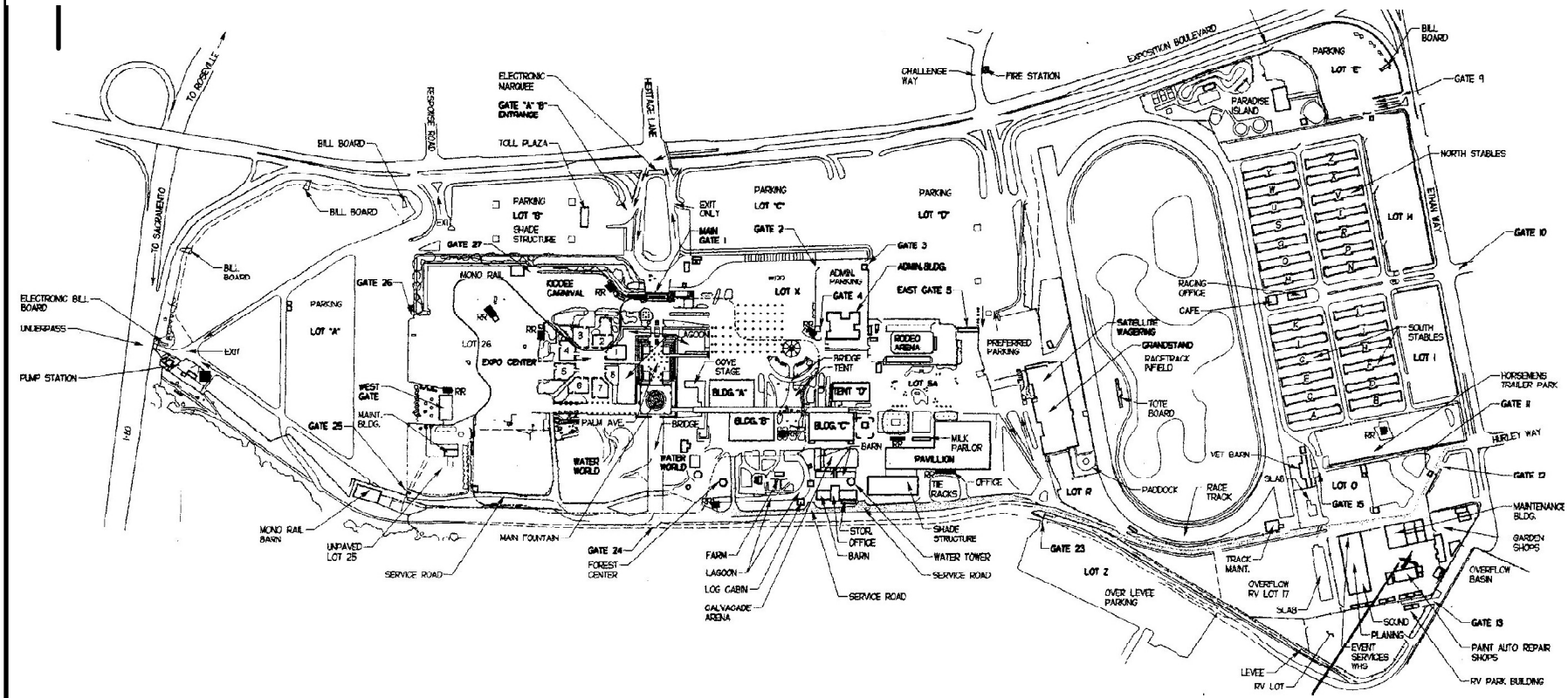
4.4 Reporting

Each year Cal Expo will report to the RWQCB the accomplishments achieved under each of the MCMs. The report will also include any modifications that have been made to the Phase II SWMP.

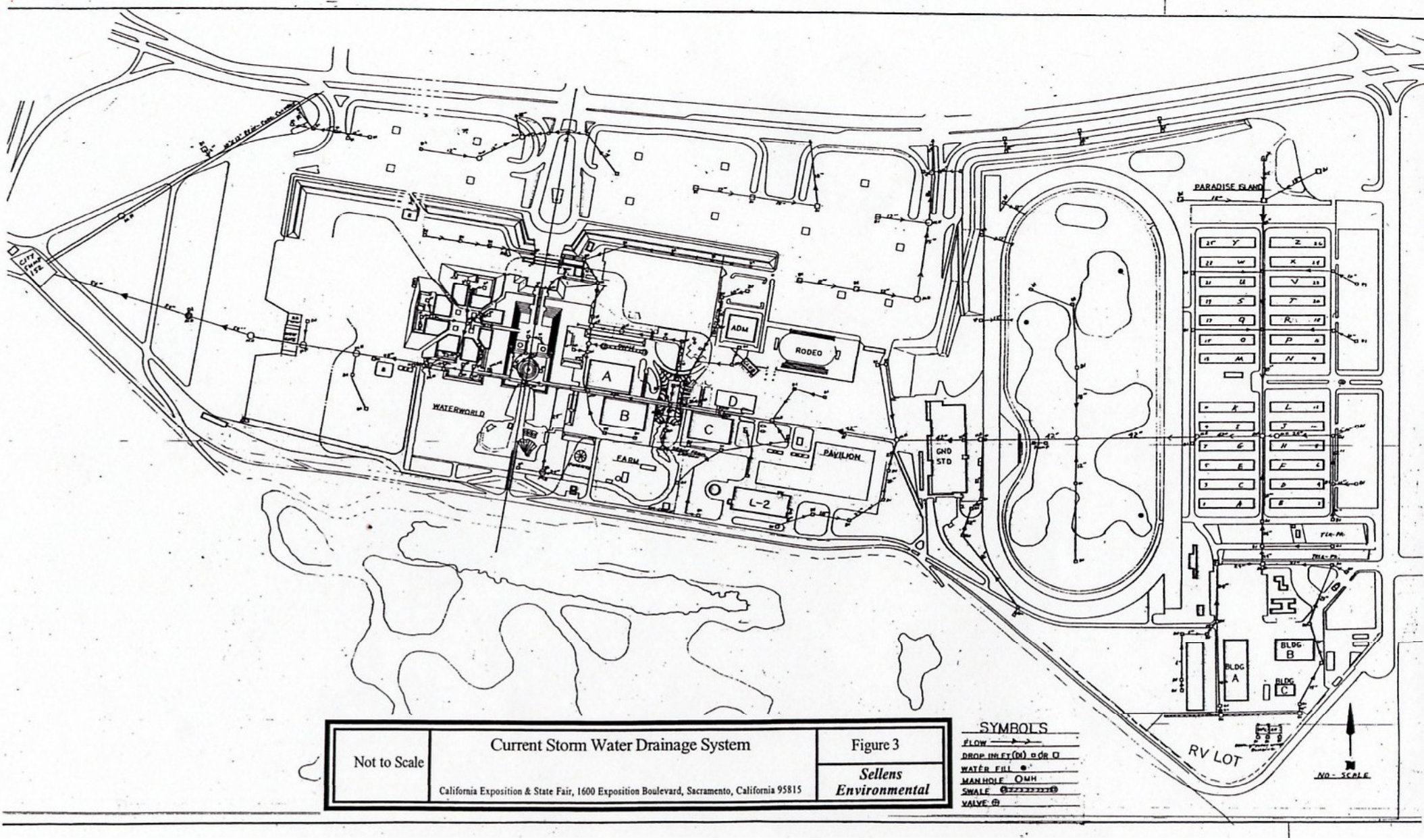
A copy of the NOI is included in Appendix B.



Scale (approx) 1" = 2,800'	Location of California Exposition & State Fair (Cal Expo) California Exposition & State Fair Sacramento, California	Figure 1



Scale (approx) 1" = 600'	Layout of Cal Expo California Exposition & State Fair Sacramento, California	Figure 2



Not to Scale	Current Storm Water Drainage System California Exposition & State Fair, 1600 Exposition Boulevard, Sacramento, California 95815	Figure 3 *Sellens Environmental*

Table 1
Potential Pollutant Activities and Sources
California Exposition and State Fair

	Activity/Source	Activities and Potential Pollutants of Concern
1.	Maintenance Area	The Cal Expo's maintenance area is located in the southeast portion of the facility. It consists of numerous trade shops plus a warehouse and office buildings. Within the area, numerous tasks are conducted including equipment and vehicle repairs, painting jobs, and some construction and assembling of equipment. Storage of equipment, materials, and vehicles is conducted both inside and outside of the buildings throughout the maintenance area. Two above ground storage tanks (gasoline and diesel) are within the maintenance yard and used for the fueling of equipment and vehicles. In addition, a natural gas vehicle fueling system is in the same area. The majority of potentially hazardous materials, e.g.. paint, fuels, lubricants, and landscaping products, are stored inside, although some of the waste products, e.g. waste oil, are stored outside in covered areas. In addition, some vehicle cleaning may be conducted in the area. Cal Expo's maintenance area is paved.
2.	Racing Stable Area (Backstrech)	Cal Expo operates horse training and racing facilities for approximately 900 horses year-round that are located in the eastern portion of the facility. The stable area is approximately 28 acres in size, of which approximately 75% is paved or covered. The area contains 26 stables each containing 40 horse stalls, a veterinary barn, six contained horse washing areas, four covered areas for the storage of animal related wastes, training and exercise areas, and racing administrative offices. The primary potential pollutants associated with this area are animal wastes including pathogens, nitrogen compounds, salts, and organic matter.
3.	Racetrack and Grandstand	The current racetrack area consists of a one-mile unpaved dirt track, an infield of approximately 30 acres that includes two ponds (11.5 acres), track maintenance areas, and the grandstand and associated areas. An aboveground diesel fuel tank is present in the main track maintenance area at the south end of the track. Potential contaminants include sediment run-off from the track, maintenance area, and other unpaved areas, fuels and other lubricants from the track maintenance area and equipment, and general litter and debris in the grandstand and surrounding area.
		Outside of the racing stables area, livestock areas at Cal Expo consist primarily of the two livestock pavilions in the southern central area of the facility and the adjacent horse stables. All these areas are covered. There are two uncovered livestock exhibition arenas used during fairtime and for some interim events. Additionally, some small isolated areas are used where animals are exhibited, e.g. petting farm. The areas that are used for livestock purposes are used less than 20% of the time, the majority of which is during the dry summer months. The used animal bedding from the livestock pavilions and horse stables are a potential source of coliform, nitrates, and other related environmental concerns. The animal wash racks are connected to the sanitary sewer system. Storm drains are present in this area. During times when there are a large number of animals in this area, the majority of the storm drains are temporary blocked and any surface flow or discharge is discharged to the sanitary sewer.

Table 1
Potential Pollutant Activities and Sources
California Exposition and State Fair

	Activity/Source	Activities and Potential Pollutants of Concern
4.	Parking Lot and Paved Areas	Cal Expo's main parking areas are located on the north and west sides of the facility. There are also small paved parking lots throughout the facility and unpaved overflow parking areas on the Cal Expo property between the levee and the American River. The parking area on the north side of the facility is totally paved, with the area drained by the storm water system. Whereas, the parking area on the west side of the facility is only partially paved (approx 35 %), with the majority of the storm water draining on to the unpaved areas. In addition to the parking areas, the majority of the facility's walkways and outside exhibition areas are paved. The storm water from these areas would be a potential source of oil/grease, fuels, and litter.
5.	Roof "Run-Off"	There is a lot of roof area at Cal Expo, e.g. exhibition buildings and animal pavilions, however, the potential pollutants from roof runoff is minimal. Nevertheless, there is the potential because of the volume and velocity of the run-off water of increased turbidity possibly entering the storm water system. A large number of the facility's roof drains are connected directly to the storm water system, hence eliminating the potential of any surface sheet flow picking up possible contaminants.
6.	Tenants	There is currently only one permanent tenant, other than the racing operator, at Cal Expo. The Water World operations (southwest area) offer pool and water related amusement activities. Some minor maintenance activities are conducted, however, the main potential contaminants associated with their activities include chlorinated water from pools and water rides, sediment from equipment washing, and general trash.
7.	Concessions/Food Services	During large fairground activities, e.g. the State Fair, mobile concessions are distributed around the fairground. These activities have the potential to generate contaminants including wash water, food residue, oil and kitchen greases, and general trash.
8.	Carnival	During fair times, carnival activities are located on paved areas in the western and central portion of the facility. Potential contaminants associated with the carnival activities include oil and grease lubricants, fuel for generators, chlorinated water from pools and water rides, sediment from equipment washing, and general trash.
9.	Grounds Maintenance	Areas of Cal Expo, on which there are no buildings, can be divided into two areas, (1) paved areas and (2) unpaved and landscaped. Throughout the fairgrounds are numerous maintained grassy areas and flower beds. Over irrigation in these areas can result in surface run-off that contains pesticides, herbicides, fertilizers, and sediment. Additionally, over use or misuse of those chemicals can result in them being present in storm water run-off. Also, fuels and oils associated with landscaping equipment, e.g. lawn mowers, are a potential source of pollutants.
10.	Equipment Washing	Equipment not washed in the wash rack areas can generate potential pollutants, including cleaning products, oil/grease, vehicle fluids, coliform (from animal wastes), and sediments.
11.	Litter and Debris/Trash Storage	Fairground wide, litter and debris, organic materials and general waste.
12.	Building Maintenance/Construction	Washing of painting equipment, paint chips, cleaning products, sediment.

APPENDIX A

MINIMUM CONTROL MEASURES

SECTION 1: PUBLIC EDUCATION AND OUTREACH

The Public Education and Outreach section of this SWMP addresses increasing public and professional awareness of storm water and surface run-off water quality concerns and the BMPs that may be implemented with the intention of protecting the waters that receive this run-off.

1.1 Proposed Programs

The following sections describe the BMPs, activities and objectives that Cal Expo will implement to meet the goals of the MCMs. Some of these programs are currently ongoing.

1.1.1 Storm Drain Markings

Currently, a number of the storm drains are marked; however, the majority of the markings are faded or not distinguishable. Cal Expo will identify all existing marked and unmarked storm water drains on the property and a program will be developed by which a permanent sign which will be attached to the drain. Following the initial marking a program will be set-up to inspect the labeling each year and remark if deemed necessary. Also, any new storm water drains will be incorporated into the program.

1.1.2 Storm Drain Conversions

Cal Expo will implement a program to identify storm drain inlets, which are in areas that have the highest potential of being a route for contaminants to get into the storm water system, i.e. storm drains adjacent to the animal pavilions during livestock shows. Once identified, a program will be put in place to ensure that those inlets are blocked during such events and surface water is diverted to the sanitary sewer system. The storm drains will be unblocked once the event is over and any clean-up is completed.

1.1.3 Public Education /Citizen Outreach

Cal Expo will provide space at market rates, when available, during the State Fair to local municipalities for information booths. This will give the municipalities, such as the City of Sacramento and RWQCB, direct access to the public to distribute educational materials. Cal Expo will contact local municipalities and local storm water advisory committees to inform them of the availability.

1.1.4 Promoter, Vendor, and Tenant Education

Cal Expo will provide to all promoters, vendors during the State Fair, and tenants, such as Water World, operating at Cal Expo, written information regarding the impacts of their activities on storm water quality and ultimately on the receiving waters. Such items will include information on the disposal of their process and rinse water. An example of the information to be provided would be the proper disposal of soda dispenser drip tray

waste to sinks connected to sanitary sewer rather than on the ground or into storm water drains. This information will be incorporated into the terms and conditions of any new contract to operate at the Cal Expo facility. Non-compliance with BMPs would subject the contractor to warnings, penalties or possible cancellation of their contract.

1.1.5 Public Outreach

Cal Expo will utilize available excess capacity on the facility's electronic signs to display storm water education information. The nature of the messages will be coordinated with local municipalities and local storm water advisory committees. Cal Expo will contact local municipalities and local storm water advisory committees to inform them of the availability and to get their input on the nature of the messages.

1.2 Goals and Assessment

The table below presents measurable goals for the BMPs to be implemented and assessed during the five year permit term. The purpose of measurable goals is to monitor permit compliance and the effectiveness of the program.

Table A1: PUBLIC EDUCATION AND OUTREACH BMPs

BMP #	BMP	Measurable Goal	Completion Date (m/y)
1	Identification of Storm Drains	Inventory existing storm water outfall markings and their quality	Ongoing
		Label all unmarked Storm Drains and Outfalls	Ongoing
		Implement annual plan to inspect markings and re-mark when necessary	6/06
		Require all new construction plans to include storm drain labeling, when required	Immediate
2	Storm Drain Conversions	Identify storm water drains in areas where there is potential for pollutants to enter the storm water system, based on activities	Ongoing
		Construct and implement temporary switch to sanitary sewer system	12/08

3	Public Education	Identify local municipalities and advisory committees to be contacted regarding availability of booth space at the State Fair	6/06
		Inform selected local municipalities and advisory committees for particular event	6/06/ongoing
4	Promoters Education	Prepare Promoters Education Packages	12/06
		Provide Vendor with Education Package and provide workshops, if applicable	1/07/ongoing
5	Tenant Education	Prepare Tenant Education Package	12/06
		Provide Tenant Education Package	12/06/ongoing
6	Public Outreach	Work with local agencies to design message for electronic signs to promote Storm Water protection awareness	6/06
		Place Storm Water protection message on electronic signs	6/06/ongoing

1.3 Documentation and Annual Reporting

Cal Expo's Maintenance Manager will maintain a record on the implementation of each BMP. The collected information will be used to evaluate and revise activities in an on-going effort to control storm water pollution to the MEP. Progress shall be reported to the RWQCB in an annual report.

SECTION 2: PUBLIC PARTICIPATION AND INVOLVEMENT

The Public Participation and Involvement portion of a SWMP addresses the importance of public involvement with respect to the protection of storm water and the receiving waters.

2.1 Proposed Programs

Due to the nature of the activities and the facility set-up, public participation and involvement at Cal Expo will be limited. However, Cal Expo will work with employees, tenants and vendors, along with any volunteers, to address storm water issues. The following sections describe the BMPs, activities and goals that Cal Expo will implement to meet the goals of the MCMs.

2.1.1 Employee, Promoter, Vendor, and Tenant Education

Cal Expo will prepare education packages that will be provided to all employees, promoters, vendors, and tenants operating at Cal Expo regarding the impacts of their activities on storm water quality and ultimately the receiving waters. Site meetings will be held at which all parties working or operating at the facility will be able to voice their ideas and opinions. Additionally, all parties will have the opportunity to assist in the preparation and revisions of the facility plan and with the implementation of the plan.

2.1.2 Public Participation

Cal Expo will investigate the possibility of having the public involved in storm water issues at the facility. This may include the design of storm drain labels or storm-water education activities during fair activities.

2.2 Goals and Assessment

The table below presents measurable goals for the BMPs to be implemented and assessed during the five year permit term. The purpose of measurable goals is to monitor permit compliance and the effectiveness of the program.

Table A2: PUBLIC PARTICIPATION AND INVOLVEMENT BMPs

BMP #	BMP	Measurable Goal	Completion Date (m/y)
7	Employee Education and Participation	Implement annual meetings to provide information and allow discussion on storm water management issues	6/06
8	Promoter and Vendor Education and Participation	Prepare Promoter and Vendor Education Package	12/06
		Implement annual meetings to provide information and allow discussion on storm water management issues	12/06
9	Tenant Education and Participation	Prepare Tenant Education Package	12/06
		Implement annual meetings to provide information and allow discussion on storm water management issues	12/06

2.3 Documentation and Annual Reporting

The Cal Expo Maintenance Manager will maintain a record on the implementation of each BMP. The collected information will be used to evaluate and revise activities in an on-going effort to control storm water pollution to the MEP. Progress shall be reported to the RWQCB in an annual report.

SECTION 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION

The Illicit Discharge Detection and Elimination section of the SWMP addresses non-storm water flows that are discharged to receiving waters via the storm water conveyance system. The objective of this program will be to implement BMPs to assist in the identification of illicit discharges and removal of those discharges from the system and on the prevention of new illicit discharges. The program, which will be integrated with the Public Education and Outreach Program, will be implemented through education, regulations and through spill prevention and response. Listings of potential discharges are presented in Table 1.

At Cal Expo, certain non-storm water discharges will be allowed under this SWMP. These discharges will include, but not limited to, the following:

- Fairground paving wash down with potable water (following removal of any trash)
- Water line flushing
- Uncontaminated groundwater infiltration, e.g. building sumps
- Discharges from potable water
- Air conditioning condensate
- Non-reclaimed irrigation water
- Dechlorinated swimming pool discharge
- Non-chlorinated ponds
- Fire fighting flows

3.1 Proposed Programs

The following sections describe the BMPs activities and goals that Cal Expo will implement to meet the goals of the MCM.

3.1.1 CAFO

In June 2002, the RWQCB-Central Valley Region classified the horse racing stables at the eastern end of the facility, adjacent to Ethan Way, as a concentrated animal feeding operation (CAFO) and required that Cal Expo submit a compliance schedule. The compliance schedule was to develop facilities or practices to eliminate dry weather flows from the racing stables entering the storm drain system, and eliminate or minimize the racing stable area pollutant loading during storm events. As a result, a system has been installed that diverts all dry weather flow into the sanitary sewer system. The system also retains the initial and most contaminated precipitation run-off in any storm event (42,000-gallons). This collected storm water is later discharged to the sanitary sewer system.

Due to the nature of the activity in this area and the resulting interpretation, this area will obtain its own Industrial Storm Water Permit, in accordance with 40 CFR, Part 412. Although a separate permit, it will be implemented under the Phase II Storm Water

General Permit. As part of the Industrial Permit, Cal Expo will implement a separate Storm Water Sampling Program for the Racing Stable Area. A copy of the Sampling Plan for the area is included as Attachment I. In addition, separate reporting for the Industrial Permit will be conducted.

3.1.2 Storm Drain System Map

Maintain and revise, if required, Cal Expo's Storm Drain System Map. This map will include locating all outfall drains, man-holes, location of storm water conveyance lines, and the names of all receiving waters. The map will be updated annually. This map will be used for identifying pollutant sources and prioritizing opportunities for water quality improvement

3.1.3 Storm Drain Marking

The Storm Drain marking program discussed in Section 1 will be implemented with the intention of discouraging disposal into the storm drains.

3.1.4 Facility Activity Evaluation

Determine that no potential illicit discharges are connected to the storm water system, for example, chlorinated pool overflows. If any connections are identified, the improper physical connections will be eliminated. Water use features, e.g. fountains, will be evaluated to ensure that water is being recycled and not being disposed of into the storm drain system.

3.1.5 Storm Screening

An audit of the facility will be conducted to identify potential areas of illicit discharges, e.g. fueling areas and waste storage areas. Cal Expo staff will be trained on the detection and identification of potential illicit discharges during storm periods.

3.1.6 Dry Weather Screening

Cal Expo staff will be trained on how to detect non-storm water discharges (not including those that are exempt and presented in the introduction to Section 3). Inspections will be conducted on a semi-annual basis. In areas of potential concern, e.g. in the vicinity of the livestock pavilion, animal stalls and barns, and animal wash-racks, inspections will be conducted on a daily basis when they are in use. If any non-storm water discharges are identified, Cal Expo staff will implement measures to correct the problem. To evaluate and monitor dry weather storm water discharges, Cal Expo will implement a Fair-Wide Dry Weather Sampling Program, with the corresponding Sampling Plan included as Attachment II. The sampling will be conducted twice a year. One of these sampling events will coincide with a time of maximum use of the facility and the other with one of the proposed semi-annual inspections.

3.2 Goals and Assessment

The table below presents measurable goals for the BMPs to be implemented and assessed during the five year permit term. The purpose of measurable goals is to monitor permit compliance and the effectiveness of the program.

Table A3: ILLICIT DISCHARG E DETECTION AND ELIMINATION BMPs

BMP #	BMP	Measurable Goal	Completion Date (m/y)
10	CAFO	Design of CAFO Storm Water Collection System	Completed
		Implementation of CAFO Storm Water Collection and Handling System	Ongoing
		Preparation and Implementation of CAFO Storm Water Sampling Plan	1/06
		Construction of Improved Waste Storage Areas	Completed
		Construction of Improved Animal Wash Racks	Completed
11	Storm System Map	Develop and update annually	Ongoing
12	Facility Activity Evaluation	Identify current facility activities and areas which are potential sources to impair storm water	9/06
13	Storm Screening	Identify all potential sources of potential illicit discharges	Ongoing
		Training of staff to identify and report concerns	Ongoing
		Correction of source of illicit discharge	Ongoing (depending on availability of funds)

14	Dry Weather Screening	Develop program to implement conducting of Dry Weather Screening, including inspection locations, sampling and reporting.	1/06
		Training of staff to identify and report concerns	Ongoing
		Track results with storm system map (BMP #11), identify possible source.	12/07

3.3 Documentation and Annual Reporting

The Cal Expo Maintenance Manager will maintain a record on the implementation of each BMP. The collected information will be used to evaluate and revise activities in an on-going effort to control storm water pollution to the MEP. Progress shall be reported to the RWQCB in an annual report.

SECTION 4: CONSTRUCTION SITE STORM WATER MANAGEMENT

The Construction Site Storm Water Management program is intended to reduce pollutants in storm water runoff. During construction activities, improper management can result in significant amounts of sediment being released into storm water and the receiving waters. EPA studies have determined that sediment run-off from construction sites are 10 to 20 times greater than that of agricultural lands. In addition, activities at construction sites, such as equipment fueling, can result in potentially harmful pollutants being released into the storm drain system. Phase II regulations discuss the use of a General permit to control discharges from construction sites that are between one and five acres in size. It should be noted that this includes any staging or storage areas associated with the construction project. It is Cal Expo's intention to apply the same actions to sites that are located in sensitive areas and are smaller than one acre.

4.1 Proposed Programs

Described below are the Construction Site Storm Water Runoff Control Program BMPs.

4.1.1 Pre-Planning and Design Policy

As part of the planning and design of any construction activity at the Cal Expo facility, a program will be introduced requiring that the proposed site and design be evaluated for potential storm water issues. This would include, but not be limited to, topography, drainage patterns, soil type, and construction design.

4.1.2 Erosion and Sediment Control Policy

Cal Expo will develop, implement and enforce an Erosion and Sediment Control Policy that requires all construction activities to undertake all reasonable efforts to prevent, mitigate, and control accelerated erosion resulting or arising from such earth disturbing activities. This Policy will include site plan reviews and inspections by Cal Expo personnel and a designated third party, if deemed necessary. It will be enforced during construction activities and adhering to it will be required for both Cal Expo employees and any contractors. The enforcement of the policy will be included in the terms and conditions of all construction contracts.

4.1.3 Staff Training

All Cal Expo personnel involved in construction activities shall be subject to training that focuses on the development, implementation and contents of the Storm Water Policy and how to recognize erosion and sediment problems and concerns.

4.1.4 Contractor Education and Requirements

Cal Expo will provide all contractors providing construction and excavation services at the facility with the Cal Expo Erosion and Sediment Control Policy. Based on the policy, all contractors will be required to provide their storm water protection plan prior to the start-up of any project. All contractor SWMPs will be reviewed and approved by Cal Expo personnel or their agent prior to start-up of the work. In addition, compliance with applicable storm water regulations will be incorporated into contractor contracts.

4.1.5 Site Inspections

During all construction activities, the project manager and the designated person overseeing storm water issues for construction will be required to conduct regular inspections, e.g. rain inspections, for evaluation of storm water controls. In addition, a program will be developed to include project checklists that address potential storm water issues. Violations must be immediately corrected, or at the earliest practicable opportunity, or the contractor will be subject to possible penalties or termination of the contract.

4.2 Goals and Assessment

The table below presents measurable goals for the BMPs to be implemented and assessed during the five year permit term. The purpose of measurable goals is to monitor permit compliance and the effectiveness of the program.

Table A4: CONSTRUCTION SITE STORM WATER MANAGEMENTS BMPs

BMP #	BMP	Measurable Goal	Completion Date (m/y)
15	Prepare and adopt a Storm Water Policy	Develop and adopt a facility wide Storm Water Policy for construction design and planning. This will includes internal reviews, reporting forms and staff training.	Ongoing, 6/06
16	Staff Training	Set-up and conduct training of Cal Expo personnel, with refreshers on an as-needed basis.	6/06
17	Contractor Training/Review	Prepare Contractors Standards document	6/06

18	Develop internal review procedure	Develop review procedures	3/06
19	Construction Site Inspection	Incorporate review of storm water prevention activities into normal oversight activities	9/06

4.3 Documentation and Annual Reporting

The Cal Expo Maintenance Manager will maintain a record on the implementation of each BMP. The collected information will be used to evaluate and revise activities in an on-going effort to control storm water pollution to the MEP. Progress shall be reported to the RWQCB in an annual report.

SECTION 5: POST-CONSTRUCTION STORM WATER MANAGEMENT

The goal of Post-Construction Storm Water Management MCM is to prevent or minimize the effect of new development or redevelopment for any project disturbing more than one acre of land on storm water run-off.

5.1 Proposed Programs

The following sections describe the BM's activities and goals that Cal Expo will implement to meet the goals of the MCM.

5.1.1 Storm Water Policy

Cal Expo will develop a Storm Water Policy with the intention of reducing pollutants in storm water run-off from new and redevelopment projects. This will address erosion and sediment control, construction materials and wastes, and will be obtained with pre-planning reviews, etc. Violations must be immediately corrected, or at the earliest possible opportunity, or the contractor will be subject to possible penalties or termination of the contract.

The Storm Water Policy plan will include, but not limited to, the following:

- Potential Pollutant Sources
- Site Map
- Preventive Maintenance
- Inspection Program
- Spill Prevention and Response Procedures
- Employee Training Program
- Contractor Training Program
- Written procedures and checklists for activities
- Development of required sampling plan, if deemed necessary.

5.1.2 Development Standards

All future development will be reviewed to ensure that storm water run-off is minimized and will not result in an increase in pollutants in the storm water run-off. This will be achieved by internal pre-plan review, along with the utilization of structural controls, (i.e. detention ponds, grassy swales and verges), run-off pretreatment and non-structural controls (i.e. alternative construction and site design).

5.2 Goals and Assessment

The table below presents measurable goals for the BMPs to be implemented and assessed during the five year permit term. The purpose of measurable goals is to monitor permit compliance and the effectiveness of the program.

Table A5: POST-CONSTRUCTION STORM WATER MANAGEMENT BMPs

BMP #	BMP	Measurable Goal	Completion Date (m/y)
20	Prepare and adopt a Storm Water Policy for Post-Construction Storm Water management	Development and adoption of a facility-wide Storm Water Policy. This will include but not be limited to internal pre-planning reviews, preparation of inspection and reporting forms.	Ongoing, 6/06
21	Develop Storm Water Standards for redevelopment	Develop Standards, including inspection reports, violation policy, etc.	9/06
		Implement Standards	12/06

5.3 Documentation and Annual Reporting

The Cal Expo Maintenance Operation will maintain a record on the implementation of each BMP. The collected information will be used to evaluate and revise activities in an on-going effort to control storm water pollution to the MEP. Progress shall be reported to the RWQCB in an annual report.

SECTION 6: POLLUTION PREVENTION /GOOD HOUSEKEEPING

The objectives of Cal Expo's Pollution Prevention/Good Housekeeping program will be to develop guidance for the Cal Expo employees and its operations, with the intention of reducing run-off and eliminating pollutant contamination of storm water.

6.1 Existing Programs

Below are descriptions of BMPs that are currently being conducted at Cal Expo:

- Storm Water System Maintenance : The facility's storm water drains and pipes are inspected and cleaned on an as-needed basis. Outfalls are cleaned of organic debris, i.e. leaves, on a regular basis as part of site cleaning.
- Pavement Sweeping: The pavement in the area where an activity has been conducted is swept with a vacuum truck following the completion of the activity. During long events, the pavement is swept on a daily basis, with small areas, such as food courts, occasionally pressure washed for sanitary reasons.
- CAFO Storm Water Retention: A system that diverts all dry weather flow from the storm water system into the sanitary sewer system and a collection system has been installed which retains the initial 42,000 gallons of storm water run-off prior to allowing storm water to enter Cal Expo's storm water drainage system. Additionally, four large covered areas have been constructed where all animal related wastes, e.g. straw bedding and manure, are stockpiled prior to off-site disposal. Daily street sweeping of the area has been introduced. New contained horse wash racks that are connected to the sanitary sewer system have also been installed.

6.2 Proposed Programs

Described below are the Pollution Prevention/Good Housekeeping BMPs that will be implemented at Cal Expo.

6.2.1 Spill Prevention Control and Countermeasures

The Spill Prevention Control and Countermeasures (SPCC) Plan for Cal Expo will be reviewed to ensure that it remains current. If deemed necessary it will be revised and updated. Staff training records will be reviewed and a training program will be designed and implemented. Coordination and assignment of inspections, maintenance and emergency preparedness responsibilities will be included in the training/review.

6.2.2 Development of Activity Specific Control Policies

If required, Cal Expo will develop and implement Run-Off Control Procedures for activities at the facility that may be generating pollutants and have the potential to impact storm water quality, but are not addressed in other areas of this SWMP. Using procedures and storm water maps developed under other parts of this SWMP, special policies will be developed for individual areas and activities that have the potential of impacting storm water quality run-off. The Run-Off Control Plan will include, but not limited to, the following:

- Potential Pollutant Sources
- Site Map
- Preventive Maintenance
- Inspection Program
- Spill Prevention and Response Procedures
- Employee Training Program
- Contractor Training Program
- Written procedures and checklists for activities
- Development of a sampling plan, if deemed necessary and not covered by existing plan

6.2.3 Pollution Prevention Evaluation

Cal Expo will evaluate methods to reduce the need for environmentally hazardous substances, along with the control, storage and disposal of these spent substances in the facility's operation. This will include activities associated with pesticides, herbicides and fertilizer applications. Cal Expo will also investigate methods to reduce waste to the MEP.

6.2.4 Development Standards

All future development will be reviewed to ensure that storm water run-off is minimized and will not result in an increase in pollutants in the storm water run-off. This will be achieved by internal pre-plan review, along with the utilization of structural controls, (detention ponds or run-off pretreatment) and non-structural controls (alternative construction and site design).

6.3 Goals and Assessment

The table below presents measurable goals for the BMPs to be implemented and assessed during the five year permit term. The purpose of measurable goals is to monitor permit compliance and the effectiveness of the program.

Table A6: POLLUTION PREVENTION/GOOD HOUSEKEEPING BMP's

BMP #	BMP	Measurable Goal	Completion Date (m/y)
22	Storm System Maintenance	Conduct and log	Current
23	Pavement Sweeping	Ongoing	Current
24	SPCC Maintenance	Review/Update of SPCC Plan	6/06
		Plan and Implement SPCC training	6/06
25	Development of Run-Off Control Plans	Prepare facility map which documents all operations of potential concern	On an as-needed basis
26	Pollution Prevention Evaluation	Identify all areas where potential pollutants are stored, e.g. drum storage areas. Evaluate storage areas and potential problems.	Ongoing
		Prepare plans to remediate all storage areas where concerns are identified.	6/06

6.4 Documentation and Annual Reporting

Cal Expo's Maintenance Manager will maintain a record on the implementation of each BMP. The collected information will be used to evaluate and revise activities in an on-going effort to control storm water pollution to the MEP. Progress shall be reported to the RWQCB in an annual report.

APPENDIX B

NOTICE OF INTENT (WQO 2003-0005-DWQ)

State Water Resources Control Board
NOTICE OF INTENT
TO COMPLY WITH THE TERMS OF THE GENERAL PERMIT FOR
STORM WATER DISCHARGES FROM
SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS
(WATER QUALITY ORDER NO. 2003 – 0005 - DWQ)

I. NOI Status

Mark Only One Item 1. [X]New Permittee 2. [ ]Change of Information WDID #:_____

II. Agency Information

A. Agency: California Exposition & State Fair				
B. Contact Person: Mr. Steve Launey		C. Title: Chief Plant Operations		
D. Mailing Address: PO Box 15649		E. Address (Line 2):		
F. City: Sacramento	State: CA	G. Zip: 95852	H. County: Sacramento	
I. Phone: (916)263-3773	J. FAX: (916) 263-1158	K. Email Address: SLauney@calexpo.com		

L. Operator Type (check one)
1. [ ] City 2. [ ] County 3. [X] State 4. [ ] Federal 5. [ ] Special District 6. [ ] Government Combination

III. Permit Area

California Exposition & State Fair

IV. Boundaries of Coverage (include a site map with the submittal)

See Attached Maps

North: Exposition Blvd; East: ETHAN Way; South: Bushy Lake Prese
-rve and the American River; West: Capital City Freeway (HW80)

V. Billing Information

A. Agency: California Exposition & State Fair				
B. Contact Person: Mr. Steve Launey		C. Title: Chief Plant Operations		
D. Mailing Address: PO Box 15649		E. Address (Line 2):		
F. City: Sacramento	State: CA	G. Zip: 95852	H. County: Sacramento	
I. Phone: (916) 263-3773	J. FAX: (916) 263-1158	K. Email Address: SLauney@calexpo.com		

Fees are based on the daily population served by the Small MS4. To determine your fee, consult the current fee schedule (California Code of Regulations, Title 23, Division 3, Chapter 9 Article 1), which can be viewed at www.swrcb.ca.gov/stormwtr/municipal.html.

L. Population_____

Fee _____

Check(s) should be made payable to the SWRCB and submitted to the appropriate RWQCB.

1. [X] Applying for Individual General Permit Coverage

2. [ ] Applying for a permit with one or more co-permittees

The undersigned agree to work as co-permittees in implementing a complete small MS4 storm water program. The program must comply with the requirements found in Title 40 of the Code of Federal Regulations, parts 122.32. Attach additional sheets if necessary. Each co-permittee must complete an NOI.

Lead Agency	Signature
Agency	Signature
Agency	Signature
Agency	Signature

3. [ ] Separate Implementing Entity (SIE)

A. Agency			
B. Contact Person	C. Title		
D. Mailing Address	E. Address (Line 2)		
F. City	State CA	G. Zip	H. County
I. Phone	J. FAX	K. Email Address	

H. Operator Type (check one)
1. [ ] City 2. [ ] County 3. [ ] State 4. [ ] Federal 5. [ ] Special District 6. [ ] Government Combination

Minimum Control Measures being implemented by the SIE (check all that apply)

[ ] Public Education [ ] Public Involvement [ ] Illicit Discharge/Elimination
[ ] Construction [ ] Post Construction [ ] Good Housekeeping

"I agree to coordinate with the agency identified in Section III of this form and comply with its qualifying storm water program. I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. Additionally, I certify that the provisions of the permit, including the development and implementation of a Storm Water Management Program, will be complied with."

N. Signature of Official _____ Date _____

VII. Storm Water Management Plan (check box)

[ ] As per section A.2. of this General Permit, the SWMP is attached.

VIII. Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. Additionally, I certify that the provisions of the permit, including the development and implementation of a Storm Water Management Program, will be complied with."

A. Printed Name: Brian May

B. Title: Deputy General Manager

C. Signature: Brian May D. Date: 11/13/03

ATTACHMENT I

CAFO/Racing Stable Area Sampling Plan

SAMPLING PLAN FOR THE CONCENTRATED ANIMAL FEEDING OPERATION/ RACING STABLE AREA

AT THE
CALIFORNIA EXPOSITION & STATE FAIR
1600 Exposition Boulevard
Sacramento, California 95815

Prepared for:

CALIFORNIA EXPOSITION & STATE FAIR
1600 Exposition Boulevard
PO Box 15649
Sacramento, California 95852-1649

Prepared by:

SELLENS CONSULTING LLC
5031 Lourina Court
Fair Oaks, California 95628

May 2006

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1.0 INTRODUCTION

The California Exposition and State Fair (Cal Expo) has been designated by the California Regional Water Quality Control Board (RWQCB) as a regulated Small Municipal Separate Storm Sewer System (MS4). Within the confines of Cal Expo property, Cal Expo operates horse training and racing facilities for approximately 900 horses year round. The facilities, located in the eastern portion of the facility, include 26 stables each containing 40 horse stalls, six enclosed horse washing areas, training track, horse exercise areas and four covered waste bedding accumulation areas. Based upon the nature of the operations within this area, it meets the classification of a Concentrated Animal Feeding Operation (CAFO). The locations of Cal Expo and the Racing Stables are shown in Figures 1 and 2, respectively.

Under the guidance of the MS4 requirements, Cal Expo is required to obtain permits for discharges via its storm water system. A condition of this permit is to prepare a Storm Water Management Plan (SWMP) which provides a comprehensive program to identify and reduce discharges via the storm water system, with the purpose of protecting water quality by reducing the volume of potential pollutants in storm water run-off leaving Cal Expo. As a result, Cal Expo has introduced various measures to meet this condition, such as, elimination of dry weather flow to the storm water drain system, improved handling and storage of animal wastes and soiled hay, and wash rack areas that are contained and connected to the sanitary sewer.

The purpose of this document is to outline a sampling and monitoring plan to monitor the effect of the implemented improvements and evaluate whether additional applications are required to improve the quality of the storm water run-off from the CAFO/Racing Stable area.

2.0 BACKGROUND

A CAFO typically concentrates animals in feeding and stall areas, including open corrals. At Cal Expo, the horses are kept in their stalls the majority of the time, only leaving the stalls for training and cleaning. This limits the volume of animal waste being disposed of in uncovered areas that have the potential of entering the storm water drainage system. Facility wastes include manure, bedding, hair, spilled feed and leachate from silage. The composition of animal waste depends on the size, maturity, health and composition of the animal feed. Generally, the primary pollutants associated with animal wastes include pathogens, nitrogen compounds, salts, and organic matter. During recent years, Cal Expo has implemented measures and practices with the objective of reducing the volume of these pollutants that can enter Cal Expo's storm water drainage system. These measures and practices include, but are not limited to, the following:

- Diverting all dry weather flow from the storm water drainage system into the sanitary sewer system.

- Construction of four large covered areas where all animal related wastes, i.e. straw bedding, are stockpiled prior to off-site disposal.

- Daily street sweeping operation to remove any dropped animal wastes or manure.

- Constructions of new horse wash racks that are contained and connected to the sanitary sewer system, to minimize the potential of any surface run-off.

- Construction of a collection system which retains the initial 42,000-gallons of storm water, prior to allowing storm water to enter Cal Expo's storm water drainage system. The collected storm water is retained for a minimum of 24 hours, after which it is disposed via the sanitary sewer system.

3.0 SAMPLING OBJECTIVES

The purpose of the proposed sampling and monitoring is as follows:

- Determine the level of contaminants being generated.
- Determine the level of contaminants that are entering the storm water drainage system.
- Determine the level of contaminants that are entering the City of Sacramento's lift station.
- Determine whether implemented "Best Management Practices" (BMP) are reducing the level of contaminants entering the storm water drainage system and leaving the Cal Expo property.

To meet these objectives, a storm water sampling program will be implemented.

4.0 SAMPLE LOCATION AND MONITORING PLAN

This section presents the monitoring plan that will be implemented for the CAFO area of Cal Expo. The section identifies the samples to be collected and the constituents to be analyzed.

4.1 Storm Water Sampling

Historically, storm water from the CAFO area flowed directly to storm water drains throughout the area and through Cal Expo's system, to the City of Sacramento's lift station (Sump 152) in the southwest corner of the facility. At the lift station, the storm water combines with the City of Sacramento 's storm water from the Point West and Arden Mall areas.

To monitor water quality being discharged from the Racing Stable area, Cal Expo proposed the implementation of the following monitoring plan.

- Daily inspections and visual monitoring of the storm water drainage system in Racing Stable area.

- Sampling and analysis of storm water run-off will be conducted a minimum of three times a year from separate storm events. One of these events will be the first significant storm event of the rainy season (October to April). The actual number of sampling events may be modified based on observations and analytical results.

- Each individual storm event sampling will be separated by a minimum of 72 hours.

- The sampling event activity will be conducted within the initial two hours, following the switch from retaining the storm water (initial 42,000-gallons) to direct discharge to the storm water drainage system.

During each sampling event, storm water samples will be conducted from the following locations. These locations are shown in Figure 3.

Location 1: At the basin where storm water is diverted into the CAFO area collection tanks. No sample will be collected until the collection tanks are full and surface storm water run-off is being directly discharged to the storm water drainage system.

Location 2: At the drop inlet in Parking Lot A (west side of Fairgrounds). This location is on Cal Expo's main storm water drainage system line (see Figure 2) and is the last location where storm water from the Cal Expo facility can enter the storm water drainage

system prior to combining with the City of Sacramento's storm water at the lift station.

Location 3: The holding tanks in the Racing Stable area, where the initial 42,000-gallons of storm water is collected.

4.1.1 Storm Water Sample Designation

A standard sample identification (SampID) scheme will be implemented to ensure consistent and unique sample numbers for all sampling locations and events.

Location: Samples will be labeled with the location as identified above, i.e. Location 1.

Season: Samples collected in any particular rainy season (October to April) will be labeled with a two numeric characters of the year in which the rainy season commenced, e.g. samples collected in November 2005 or February 2006, would be labeled "-05".

Event: The sampling event for the particular rainy season, as a two digit numeric character, i.e. -02.

Example: The initial storm water sample collected from Location 3 in December 2006 would be labeled "Location 3-06-01".

In addition to the SampID, all storm water samples will be labeled with the following information.

1. the site location (Cal Expo);
2. the date (M/D/Y) and time (24-hour clock) of sample collection; and
3. the initials of the sampler.

4.1.2 Sample Containers

All samples will be collected in laboratory supplied, pre-cleaned containers, and handled in accordance with EPA specifications for the appropriate methods. No sample containers will be reused. Clean, unused containers will be stored separately from used containers and containers containing samples.

3.1.3 Sample Custody and Documentation

Sample possession during all sampling events must be traceable from the time of sample collection until the results are verified and reported by the laboratory. To ensure sample possession is maintained, a "Chain-of-Custody" form will be prepared and maintained for each sampling event. The "Chain-of-Custody" forms will accompany all transportation and shipping of samples.

4.2 Sample Analysis

All samples collected in the field are subject to field observations and laboratory analysis. All laboratory analyses will be conducted by a California certified laboratory. All collected storm water samples will be analyzed for the following constituents and protocol:

Fecal Coliform (FC): Analysis following standard method SM 9221E

Total Coliform (TC): Analysis following standard method SM 9221E

Biological Oxygen Demand (BOD): Analysis following EPA Method 405.1

Chemical Oxygen Demand (COD): Analysis following EPA Method 410.4

pH: Analysis following EPA Method 150.1

Total Suspended Solids (TSS): Analysis following EPA Method 160 or SM2540D

Nitrates as Nitrogen (N): Analysis following EPA Method 353.2

4.3 Other Activities

In an effort to monitor, control, and minimize potential contaminants from entering the storm water drainage system, other activities will be implemented, continued and documented. These will include the following:

- Routine visual inspections of the Racing Stable waste containment areas. All containment structures e.g. covered areas where all animal related wastes are stockpiled prior to the off-site disposal and the storm water collection system will be inspected, at a minimum, each week throughout the entire year and at least once each 24 hours during storm events.

- Document any actions to correct deficiencies noted as a result of inspections. Deficiencies not corrected within 60 days shall be reported with an explanation of the factors preventing immediate correction.

- Document the storm event and duration of each storm-related discharge that results in an off-property discharge of storm water from the Racing Stable Area.

- Maintain a log of the time and volume of storm water discharges to the sanitary sewer that had been collected in the storm water collection system.

- Ongoing training of Cal Expo personnel, stable hands and any other personnel involved in Racing Stable Area's related activities on the handling of animal related wastes.

- Implementation of additional "street sweeping" events and other cleaning activities on an as needed basis.

- Maintain a record of the disposal of animal waste material.

- Evaluate ongoing evaluation of technologies and construction features that would reduce the potential and volume of contaminants entering the storm water system.

5.0 COMPLIANCE AND REPORTING

5.1 Sampling and Monitoring Summary

To meet the requirements of an Industrial Storm Water Permit, an annual report will be prepared and submitted prior to June 30 of each year. In addition, as the Cal Expo Racing Stable Area is part of the Storm Water Phase II Work Plan prepared under State Water Quality Control Board Water Quality Order No. 2003-0005-DWQ General Permit No. CAS000004 , the sampling and analysis data will be duplicated in the Phase II Storm Water annual report. This document has been prepared in a manner that allows it to also be used as a stand-alone document. A copy of this document will be kept at the Fairgrounds Maintenance Office and will be available to any county, state or federal compliance inspection related to the project upon request. Copies will also be supplied to the RWQCB, CCA and any consultant who is retained by Cal Expo involved with the project.

5.2 Training

Cal Expo will train individuals to conduct the sampling. These will include employees of Cal Expo and outside consultants. Training will include, but not limited to, sampling methods and protocols.

5.3 Implementation Schedule

This Storm Water Sampling and Monitoring Plan will be implemented immediately. The initial sampling event will be conducted during the first significant storm event of the 2005-2006 rainy season, when the sampling criteria outlined in section 4.1 is met. Further storm water sampling events will be conducted at times to be determined by Cal Expo personnel.

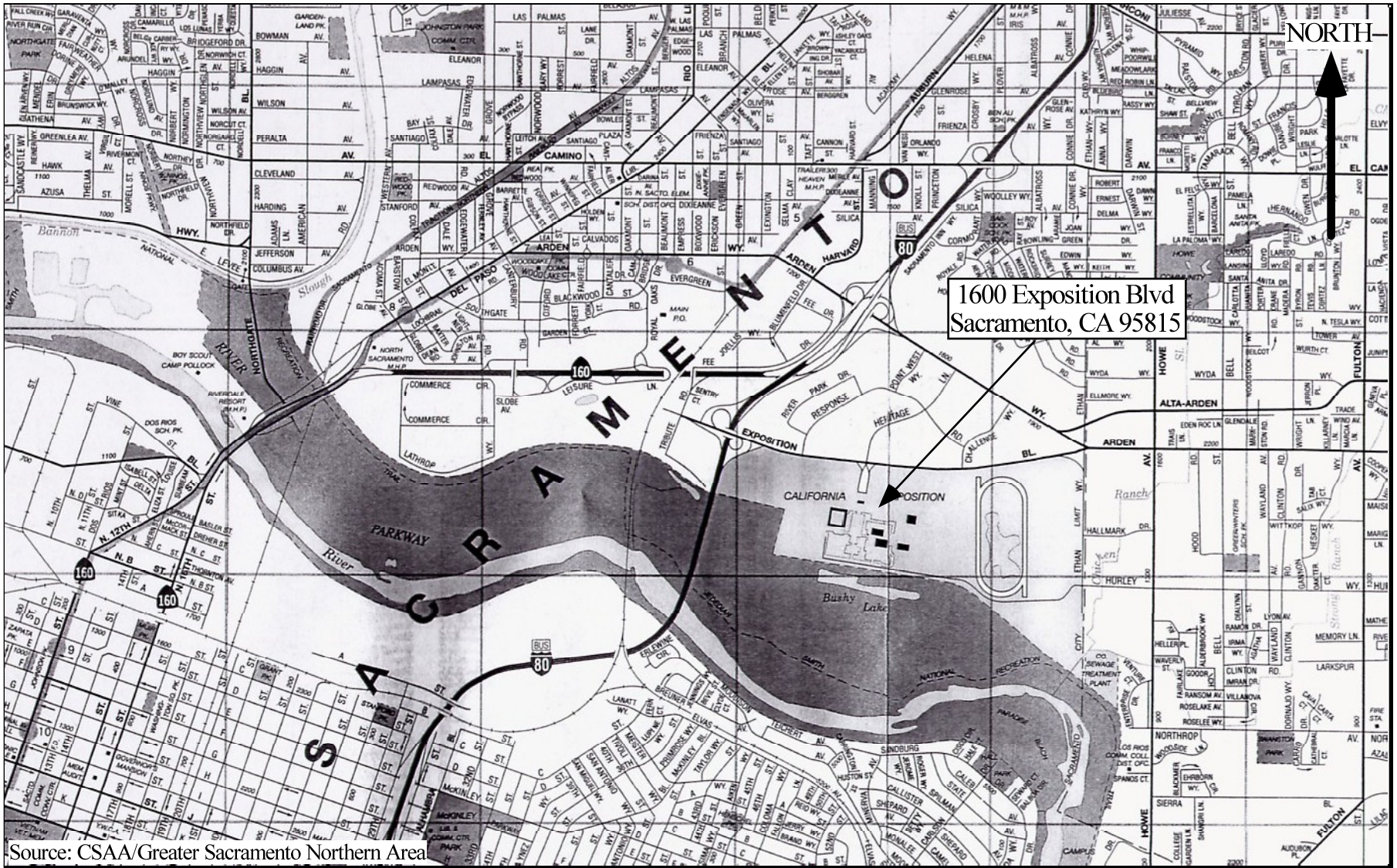
5.4 Reporting

Information related to the storm water sampling will be incorporated into Cal Expo's Phase II Storm Water Annual report. However, if requested by related regulatory agencies, results of any sampling events will be supplied on request. Copies of all reports will be maintained at Cal Expo for a minimum of five years and will be made available to any county, state or federal compliance officer upon reasonable request.

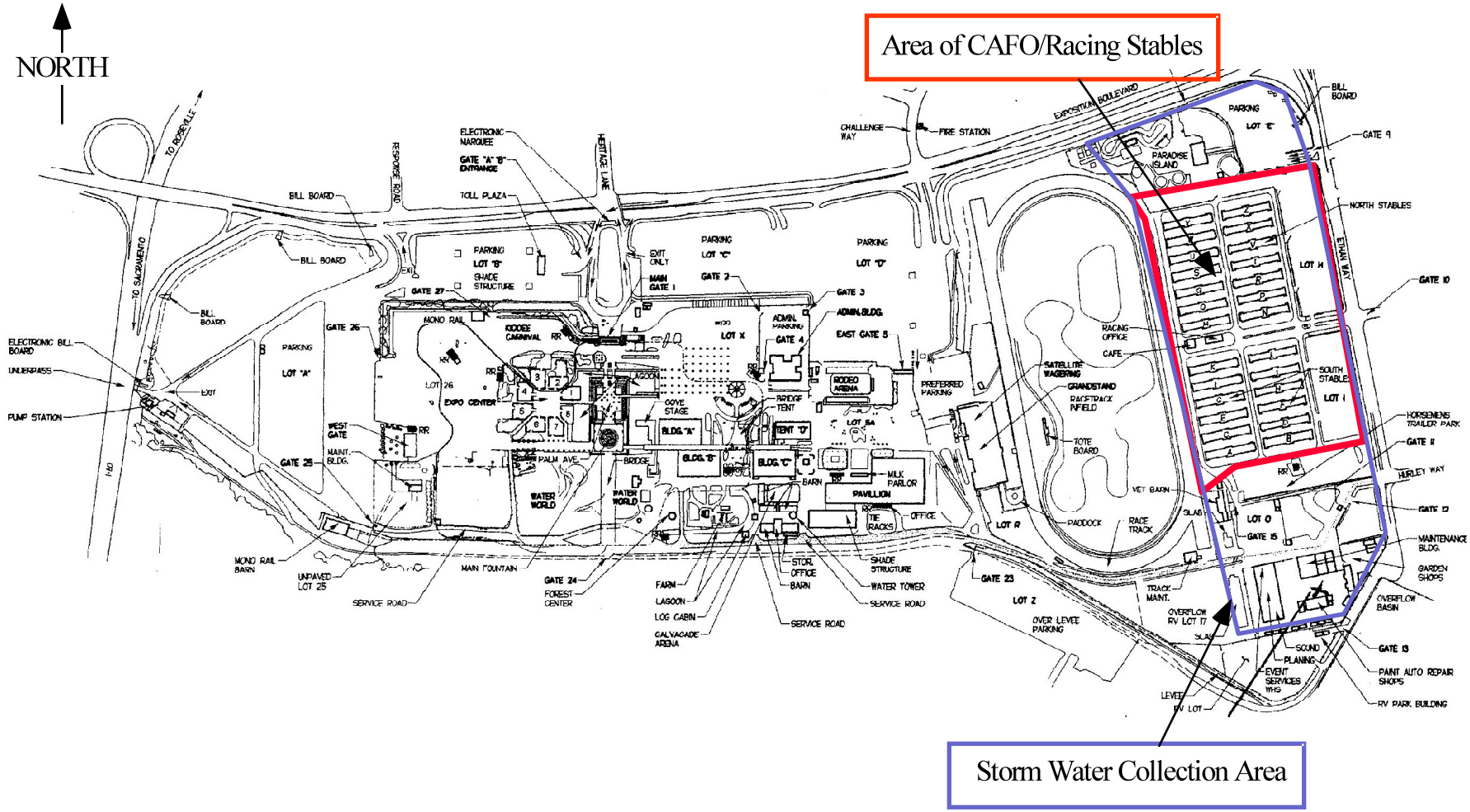
5.5 Provisions for Amendment of this Plan

Amendments to this plan will be made if Cal Expo experiences any changes in operation or the introduction of new BMPs that result in any significant changes in material handling or storage practices which could affect storm water. If sampling and analysis indicate that a particular parameter is not of concern, the future analyses of that parameter may be eliminated. Finally, amendments to this plan may be implemented if

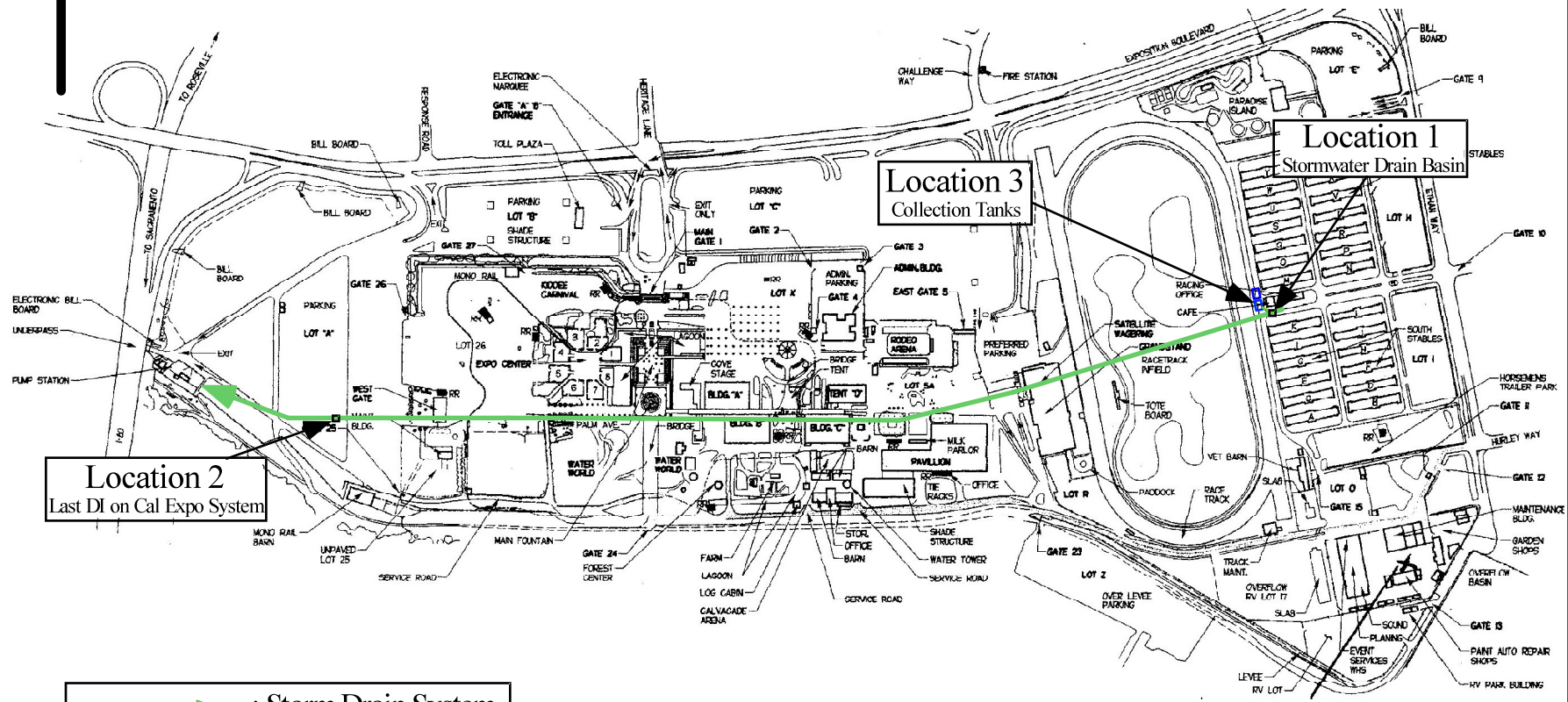
any regulatory agency determines that it is ineffective in controlling pollutants discharge to surface waters.



Scale (approx) 1" = 2,800'	Location of California Exposition & State Fair (Cal Expo) California Exposition & State Fair Sacramento, California	Figure 1



Scale (approx) 1" = 600'	Layout of Cal Expo, showing CAFO/Racing Stables Area California Exposition & State Fair Sacramento, California	Figure 2



Scale (approx) 1" = 600'	Layout of Cal Expo, Storm Water Sampling Locations California Exposition & State Fair Sacramento, California	Figure 3

ATTACHMENT II

Cal Expo General Sampling Plan

CAL EXPO GENERAL SAMPLING PLAN

FOR THE
CALIFORNIA EXPOSITION & STATE FAIR
1600 Exposition Boulevard
Sacramento, California 95815

Prepared for:

CALIFORNIA EXPOSITION & STATE FAIR
1600 Exposition Boulevard
PO Box 15649
Sacrament o, California 95852-1649

Prepared by:

SELLENS CONSULTING LLC
5031 Lourina Court
Fair Oaks, California 95628

May 2006

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1.0 INTRODUCTION

The California Exposition and State Fair (Cal Expo) has been designated by the California Regional Water Quality Control Board (RWQCB) as a regulated Small Municipal Separate Storm Sewer System (MS4). Within the confines of Cal Expo property, there are a number of activities that have the potential to deliver pollutants to the storm water drainage system.

Under the guidance of the MS4 requirements, Cal Expo is required to obtain permits for discharges via its storm water system. A condition of these permits is to prepare a Storm Water Management Plan (SWMP) that provides a comprehensive program to identify and reduce discharges via the storm water system, with the purpose of protecting water quality by reducing the volume of potential pollutants in storm water run-off leaving Cal Expo. As a result Cal Expo has introduced various measures, e.g. elimination of dry weather flow to the storm water drainage system, connection of wash racks to the sanitary sewer and education of tenants and vendors.

The purpose of this document is to outline a sampling and monitoring plan to monitor the effect of the implemented improvements and evaluate if additional applications are required to improve the quality of the storm water run-off from particular areas of the facility.

2.0 BACKGROUND

The site provides a year-round, multi-use fairground facility and racetrack. Cal Expo maintains areas both open and closed to the general public, which include the fairgrounds themselves, racetrack and associated stable areas, livestock barns, recreation areas, e.g. Water World (not operated by Cal Expo), concert facilities, maintenance areas and parking lots. Fairground activities throughout the year include the State and Sacramento County Fairs, exhibits, tradeshows, concerts, satellite wagering and farmers' market. Racetrack (harness and thoroughbred racing) and stable activities are active for approximately 11 months of the year. The main livestock shows occur during the Sacramento County Fair and the California State Fair, although smaller shows do occur throughout the year. Livestock is on the facility for fewer than 45 days per year. The water park is seasonally operated. A seasonal Farmers' Market is typically operated once a week between April and November. Other activities, e.g. private parties, are conducted periodically throughout the year. The location and layout of Cal Expo are shown in Figures 1 and 2, respectively.

Storm water drainage at Cal Expo is controlled by two storm water drain systems. The main system, into which the majority of the facility's storm water drains, runs east-west throughout the complete width of Cal Expo. This system consists of a 42-inch storm drain that bisects the stable area on the east side of the facility, runs under the racetrack and grandstand, enlarges to a 54-inch pipe and collects storm water from the rest of the Cal Expo property. Into this main line numerous laterals run from both the north and the south, throughout its whole length. A second storm water system drains the paved parking lots adjacent to Exposition Boulevard on the north side of the facility. Storm water from these parking lots drains into a storm water drainage system that also collects storm water from the area on the north side of Exposition Boulevard. Both storm water lines flow to a city-owned pump station located on the levee in the southwest corner of Cal Expo, adjacent to Highway Business 80.

There is no known surface water runoff (e.g. drainage ditches) in the main Cal Expo developed area into which storm water and pavement wash-down water would enter and exit the facility. It is believed that that the majority of the site's surface water drains into the two storm water systems, discussed above. However, some surface water from the west end of the facility and the West Parking Lot does drain onto the unpaved area at the western edge of Cal Expo.

3.0 SAMPLING OBJECTIVES

The purpose of the proposed sampling and monitoring is as follows:

- Determine the level of contaminants being generated in particular areas of the facility and those that are entering the storm water drainage system.
- Determine if implemented "Best Management Practices" (BMP) are reducing the level of contaminants that are entering the storm water drainage system and leaving the Cal Expo property.

To meet these objectives , a storm water system sampling program will be implemented , to monitor discharges to the storm water system during the wet and dry season .

4.0 SAMPLE LOCATION AND MONITORING PLAN

This section presents the monitoring plan that will be implemented for the Cal Expo facility. Additional sampling has been proposed that is associated with the facility's Racing Stables Area. Fair-wide sampling will, if possible, be coordinated with the sampling in the Racing Stables Area. The section identifies the samples to be collected and the constituents to be analyzed as part of the facility-wide sampling.

4.1 Storm Water System Monitoring and Sampling

Based upon a review of the Cal Expo storm water system and activities at the facility, the following actions are proposed to monitor water quality being discharged from the various operational areas at Cal Expo.

- When in use, active areas of the facility will be subject to daily inspections and visual monitoring of the storm water drainage system. These areas will include, but not be limited to the following:

  : Livestock Pavilions
  : Concession and Food Court Area
  : Carnival Area

- Sampling and analysis of one dry weather flow event, from the following locations:

  : Livestock Pavilion
  : Food Court/Concession Area
  : Parking Lot A, prior to the City of Sacramento 's lift station.[1]

  These locations are shown in Figure 3.

- Sampling and analysis of one storm water run-off event. This will be conducted in coordination with storm water sampling associated with the Racing Stable Area storm water sampling.

4.1.1 Storm Water Sample Designation

A sample identification (SampID) scheme will be implemented to ensure consistent and unique sample numbers for all sampling locations and events.

Location: Samples will be labeled with the location collected, i.e. Livestock Pavilion

[1]The lift station is on property owned by Cal Expo and on an easement granted to the City of Sacramento. At the lift station, storm water system run-off from Cal Expo combines with storm water system run-off from the Point West and Arden Mall area.

Date: The date on which the sample is collected, i.e. 01-06-06

Event: The sampling event for the particular year, as a two digit numeric character, i.e. -01.

Example: The initial water sample collected from the Livestock Pavilion on August 20, 2006, during the State Fair would be labeled "Livestock Pavilion/20 -08-06/01".

In addition to the SampID, all storm water samples will be labeled with the following information :

1. Site location (Cal Expo).
2. Date (M/D/Y) and time (24-hour clock) of sample collection
3. Initials of the sampler.

4.1.2 Sample Containers

All samples will be collected in laboratory supplied, pre-cleaned and treated containers according to EPA specifications for the appropriate methods. No sample containers will be reused. Clean, unused containers will be stored separately from used containers and those containing samples.

4.1.3 Sample Custody and Documentation

Sample possession during all sampling events must be traceable from the time of sample collection until the results are verified and reported by the laboratory. To ensure sample possession is maintained, a "Chain-of-Custody" form will be prepared and maintained for each sampling event. The "Chain-of-Custody" forms will accompany all transportation and shipping of samples.

4.2 Sample Analysis

Samples collected in the field are subject to field observations and laboratory analysis. All laboratory analyses will be conducted by a California certified laboratory. The analyses of the samples will be dependant on the area in which it is collected .

4.2.1 Livestock Pavilion

Water samples from the Livestock Pavilion Area will be analyzed for the following :

pH, following EPA Method 150.1

Total Suspended Solids (TSS), following EPA Method 160.2

Total Dissolved Solids (TDS), following EPA Method 160.1

Fecal and Total Coliform (FC/TC), following standard Method 9221E

Biological Oxygen Demand (BOD), following EPA Method 405.1

Nitrates as NO3 (N): Analysis following EPA Method 300.0

4.2.2 Food Court/Concession Area

During large dry season events, e.g. State Fair, this area is occasionally pressured washed after being swept for health reasons. Water samples from this area will be analyzed for the following:

pH, following EPA Method 150.1

Chemical Oxygen Demand (COD), following EPA Method 410.4

Total Oil and Grease (TOG), following EPA Method 1664

4.2.3 Parking Lot A

Sampling at the Parking Lot A site, will be the primary post facility sampling location. After this sampling location, Cal Expo's storm water combines with storm water from the City of Sacramento 's system at the city's lift station. Water samples from this area will be analyzed for the following:

pH, following EPA Method 150.1

Total Suspended Solids (TSS), following EPA Method 160.2

Total Dissolved Solids (TDS), following EPA Method 160.1

Fecal and Total Coliform (FC/TC), following standard Method 9221E

Biological Oxygen Demand (BOD), following EPA Method 405.1

Nitrates as NO3 (N): Analysis following EPA Method 300.0

Chemical Oxygen Demand (COD), following EPA Method 410.4

Total Oil and Grease (TOG), following EPA Method 1664

Sampling at this location, will likely be coordinated with sampling associated with the facility's Racing Stables.

4.3 Other Activities

In an effort to monitor, control and minimize potential contaminants entering the storm water system, other activates will be implemented, continued and documented. These will include the following:

- Drive-by visual inspections of the Cal Expo facility, storm water inlets and catchment areas will be conducted on a routine basis. Inspections will be

conducted, at a minimum, each week throughout the entire year and at least once each 24 hours during storm events.

- Document any actions to correct deficiencies noted as a result of inspections. Deficiencies not corrected within 60 days shall be reported with an explanation of the factors preventing immediate correction.

- Ongoing training of Cal Expo personnel and any other personnel involved in fairground related activities on the handling of wastes.

- Implementation of additional "street sweeping" events and other cleaning activities, on an as needed basis.

- Ongoing evaluation of technologies and construction features that would reduce the potential and volume of contaminants entering the storm water system.

5.0 COMPLIANCE AND REPORTING

5.1 Sampling and Monitoring Summary

This Sampling Plan for the Cal Expo facility, and its associated activities, is part of the Storm Water Phase II Work Plan prepared under State Water Quality Control Board Water Quality Order No. 2003-0005-DWQ General Permit No. CAS000004. This document has been prepared in a manner that will allow it to also be used as a stand alone document. A copy of this document will be kept at the Fairgrounds Maintenance Office and will be available to any county, state, or federal compliance inspection related to the project upon request. Copies will also be supplied to and kept by the RWQCB, CCA and any consultant retained by Cal Expo who is involved with the project.

5.2 Training

Cal Expo will train individuals to conduct the sampling. These will include employees of Cal Expo and outside consultants. Training will include, but not be limited to, sampling methods and protocols.

5.3 Implementation Schedule

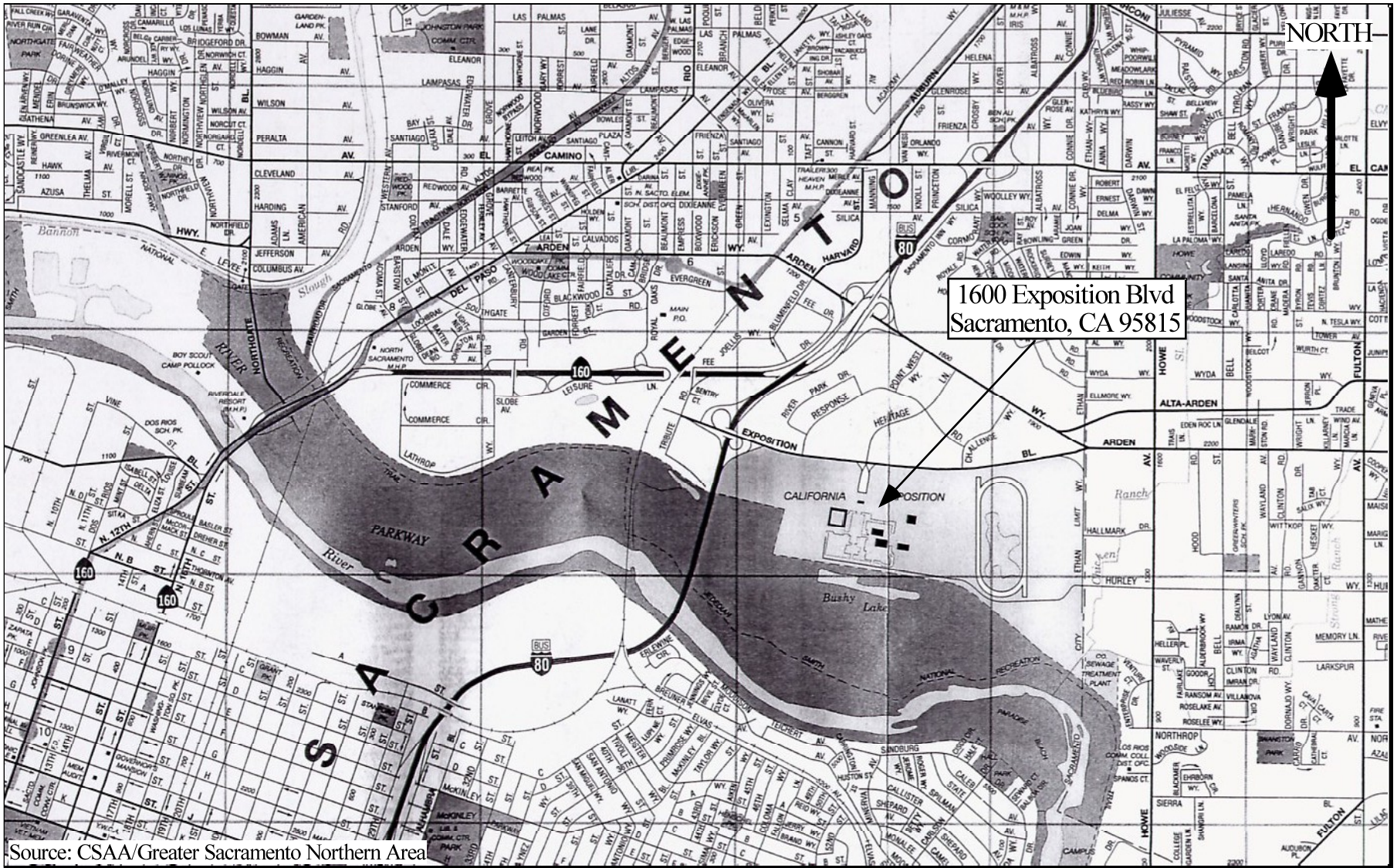
This Storm Water Sampling and Monitoring Plan will be implemented immediately. The initial sampling event will be conducted during the first significant storm event of the 2005-2006 rainy season, when the sampling criteria outlined in section 4.1 is met. Further storm water sampling events will be conducted at times to be determined by Cal Expo personnel, but will include events such as the State Fair.

5.4 Reporting

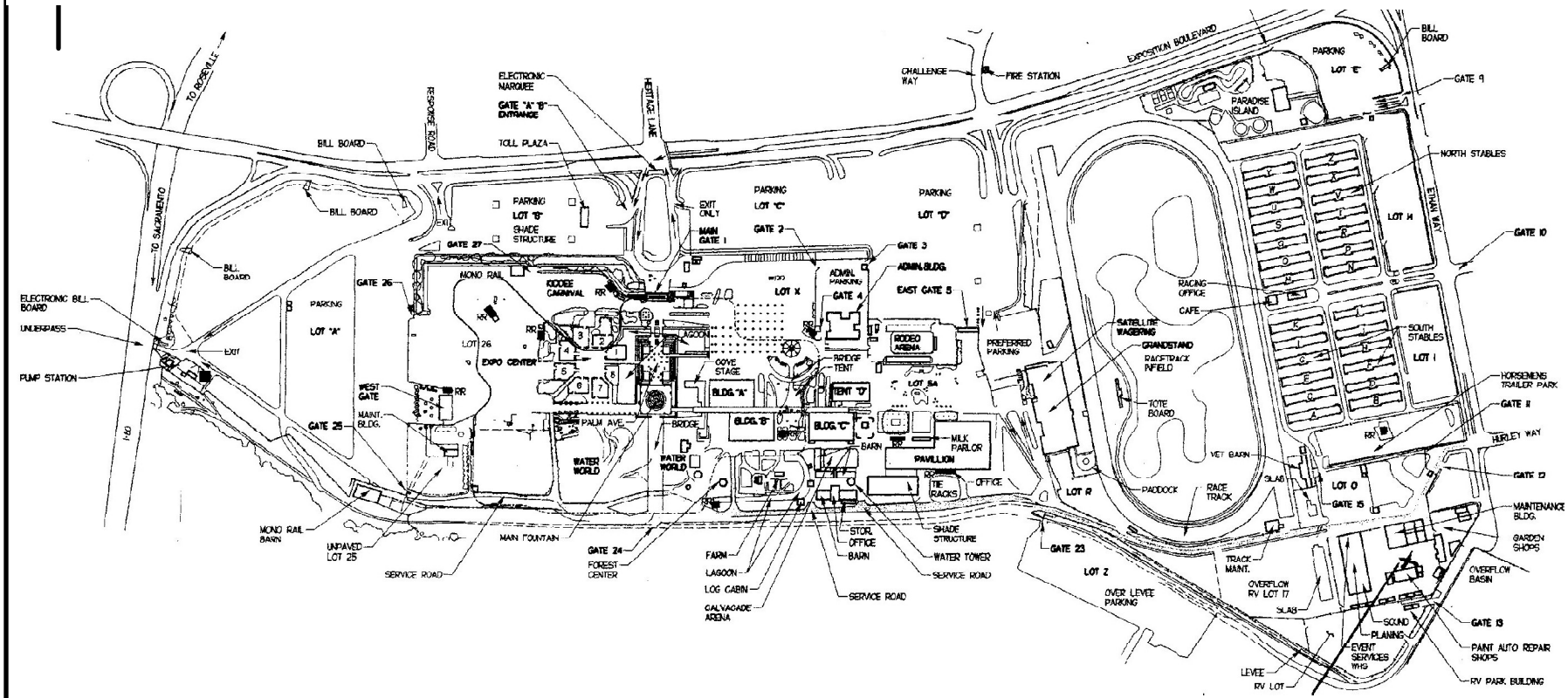
Information related to Cal Expo's fair-wide sampling and analysis will be incorporated into Cal Expo's Phase II Storm Water Annual report. However, if requested by related regulatory agencies, results of any sampling events will be supplied on request. Copies of all reports will be maintained at Cal Expo for a minimum of five years and will be made available to any county, state, or federal compliance officer upon reasonable request.

5.5 Provisions for Amendment of this Plan

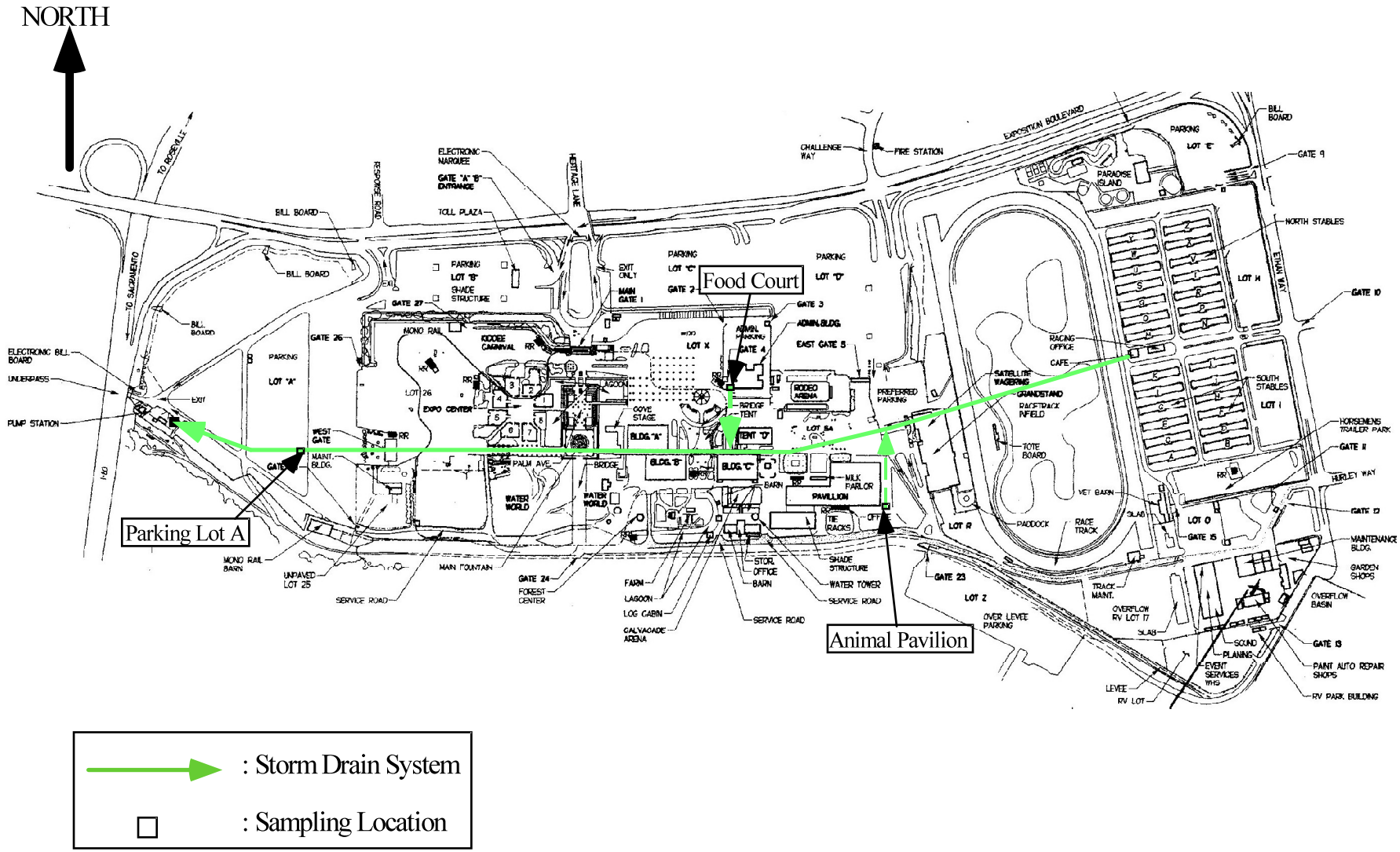
Amendments to this plan will be made if Cal Expo experiences any changes in operation or introduce any new BMPs that result in any significant changes in material handling or storage practices which could affect storm water. If sampling and analysis indicate that a particular parameter is not of concern, the future analysis of that parameter may be eliminated. Finally, amendments to this plan may be implemented if any regulatory agency determines that it is ineffective in controlling pollutants discharge to surface waters.



Scale (approx) 1" = 2,800'	Location of California Exposition & State Fair (Cal Expo) California Exposition & State Fair Sacramento, California	Figure 1



Scale (approx) 1" = 600'	Layout of Cal Expo California Exposition & State Fair Sacramento, California	Figure 2



Scale
(approx)
1" = 600'

Fair-Wide Storm Drain Sampling Locations

California Exposition & State Fair
Sacramento, California

Figure 3

CALIFORNIA EXPOSITION AND STATE FAIR

Backstretch Storm Water Operation and Management Plan

October 2005

Amended April 28, 2006

Background

In 2001 the California Exposition and State Fair (Cal Expo) was notified by the Regional Water Quality Control Board (RWQCB) that our backstretch stable area met the definition of a Confined Animal Feeding Operation (CAFO). Since that time Cal Expo has initiated a number of measures to improve the water quality of the storm water run-off. This management plan encompasses all those measures taken to date. As further refinements are incorporated to improve the backstretch storm water run-off water quality this plan will be amended and updated.

The purpose of the plan is to eliminate water run-off into the storm water system from areas where horses are stabled and where the waste straw and manure are stored prior to removal from the grounds. Best Management Practices are implemented to keep water run-off clean throughout the rest of the backstretch area.

Facilities Constructed

The first facilities to be constructed were horse wash areas to control water run-off from the washing of horses. All horses are now washed in these areas and the water is routed to the sanitary sewer system. Sand traps were installed on the sewer lines to prevent sand build-up in the lines.

Waste straw handling buildings were built to control the waste straw and manure from being exposed to rain water. Waste straw from the horse stalls and any waste material from clean-up around the stalls are taken directly to these covered buildings. Truck trailers are placed in these buildings, loaded and then removed from the grounds daily.

A storm water lift station was built to divert all dry weather water run-off from the backstretch along with the first 42,000 gallons of rain water from a storm into the sanitary sewer system. The first 42,000 gallons of water run-off is collected into two large tanks and pumped to the sanitary sewer system at the end of the rain event. A rain event is defined as any rain occurring after 48 hours from the last measurable rain. The tanks will be pumped to the sanitary sewer system within 48 hours after the end of a rain event.

Management and Operation

Management and Reporting

The Cal Expo Maintenance Department will monitor the backstretch lift station operation. Repairs to the system will be made as needed. The Maintenance Department will be responsible for maintaining logs and inspection reports. They will prepare a monthly report summarizing the results of activities for the previous month. This report will be sent to the Chief of Plant Operations to be included in the Storm Water Management Plan for Cal Expo as a whole. An annual report will be made and included with the Annual Storm Water Management Plan to the Regional Water Quality Control Board.

The Backstretch Best Management practices will be maintained and enforced by the horse racing operator. They will develop procedures and enforcement policies to ensure the Best Management Practices are in place and followed. Daily inspections and records will be maintained by the backstretch staff.

Cleaning

Clean up of the backstretch is performed by the horsemen and the backstretch staff. The horsemen keep the areas around their stables and the roadways clean. The backstretch staff remove garbage and keep all the sand traps cleaned in addition to keeping the area around the waste straw buildings and roadways clean.

Staff in the stable area clean inside the covered horse stalls and take the waste in wheel barrows to the manure handling buildings every day. Trucks are then loaded with the waste straw under cover inside the buildings and then removed from the facility. All debris cleaned up outside of the stables is disposed of in the straw handling buildings.

Inspections of the stable area are made daily to check the effectiveness of the cleaning and enforce Best Management Practices. A log of these inspections and any problems noted will be maintained. Corrective measures will be noted and the problem areas will be inspected again for compliance. Punitive measures will be taken for repeated cleanliness violations.

Lift Station Operation

All dry weather water run-off is diverted to a lift station and then pumped to the sanitary sewer system. A daily inspection will be made to ensure the system is operating properly. The lift station pit will be checked on a periodic basis for accumulation of sand. The system will be pumped when the level of the sand reaches a level requiring removal. Problems with the operation of the lift station will be corrected immediately and documented in an operation log.

At the start of a rain event a rain gauge detects the rain and switches the system to pump all run-off to the storage tanks. The system will shut the pump off when the storage tanks are full and allow the remaining water run-off to continue on to the storm water system. After 24 hours without rain the system will automatically switch back to pumping all water run-off to the sanitary sewer system. Cal Expo staff will monitor the weather and pump the water from the storage tanks to the sanitary sewer system some time during the 48 hour period after a rain event. All operations of the system will be documented in the daily lift station operation log.

SAMPLING PLAN FOR THE CONCENTRATED ANIMAL FEEDING OPERATION/ RACING STABLE AREA

AT THE
CALIFORNIA EXPOSITION & STATE FAIR
1600 Exposition Boulevard
Sacramento, California 95815

Prepared for:

CALIFORNIA EXPOSITION & STATE FAIR
1600 Exposition Boulevard
PO Box 15649
Sacramento, California 95852-1649

Prepared by:

SELLENS CONSULTING LLC
5031 Lourina Court
Fair Oaks, California 95628

May 2006

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LIST OF FIGURES

1.0 INTRODUCTION

The California Exposition and State Fair (Cal Expo) has been designated by the California Regional Water Quality Control Board (RWQCB) as a regulated Small Municipal Separate Storm Sewer System (MS4). Within the confines of Cal Expo property, Cal Expo operates horse training and racing facilities for approximately 900 horses year round. The facilities, located in the eastern portion of the facility, include 26 stables each containing 40 horse stalls, six enclosed horse washing areas, training track, horse exercise areas and four covered waste bedding accumulation areas. Based upon the nature of the operations within this area, it meets the classification of a Concentrated Animal Feeding Operation (CAFO). The locations of Cal Expo and the Racing Stables are shown in Figures 1 and 2, respectively.

Under the guidance of the MS4 requirements, Cal Expo is required to obtain permits for discharges via its storm water system. A condition of this permit is to prepare a Storm Water Management Plan (SWMP) which provides a comprehensive program to identify and reduce discharges via the storm water system, with the purpose of protecting water quality by reducing the volume of potential pollutants in storm water run-off leaving Cal Expo. As a result, Cal Expo has introduced various measures to meet this condition, such as, elimination of dry weather flow to the storm water drain system, improved handling and storage of animal wastes and soiled hay, and wash rack areas that are contained and connected to the sanitary sewer.

The purpose of this document is to outline a sampling and monitoring plan to monitor the effect of the implemented improvements and evaluate whether additional applications are required to improve the quality of the storm water run-off from the CAFO/Racing Stable area.

2.0 BACKGROUND

A CAFO typically concentrates animals in feeding and stall areas, including open corrals. At Cal Expo, the horses are kept in their stalls the majority of the time, only leaving the stalls for training and cleaning. This limits the volume of animal waste being disposed of in uncovered areas that have the potential of entering the storm water drainage system. Facility wastes include manure, bedding, hair, spilled feed and leachate from silage. The composition of animal waste depends on the size, maturity, health and composition of the animal feed. Generally, the primary pollutants associated with animal wastes include pathogens, nitrogen compounds, salts, and organic matter. During recent years, Cal Expo has implemented measures and practices with the objective of reducing the volume of these pollutants that can enter Cal Expo's storm water drainage system. These measures and practices include, but are not limited to, the following:

- Diverting all dry weather flow from the storm water drainage system into the sanitary sewer system.

- Construction of four large covered areas where all animal related wastes, i.e. straw bedding, are stockpiled prior to off-site disposal.

- Daily street sweeping operation to remove any dropped animal wastes or manure.

- Constructions of new horse wash racks that are contained and connected to the sanitary sewer system, to minimize the potential of any surface run-off.

- Construction of a collection system which retains the initial 42,000-gallons of storm water, prior to allowing storm water to enter Cal Expo's storm water drainage system. The collected storm water is retained for a minimum of 24 hours, after which it is disposed via the sanitary sewer system.

3.0 SAMPLING OBJECTIVES

The purpose of the proposed sampling and monitoring is as follows:

- Determine the level of contaminants being generated.
- Determine the level of contaminants that are entering the storm water drainage system.
- Determine the level of contaminants that are entering the City of Sacramento's lift station.
- Determine whether implemented "Best Management Practices" (BMP) are reducing the level of contaminants entering the storm water drainage system and leaving the Cal Expo property.

To meet these objectives, a storm water sampling program will be implemented.

4.0 SAMPLE LOCATION AND MONITORING PLAN

This section presents the monitoring plan that will be implemented for the CAFO area of Cal Expo. The section identifies the samples to be collected and the constituents to be analyzed.

4.1 Storm Water Sampling

Historically, storm water from the CAFO area flowed directly to storm water drains throughout the area and through Cal Expo's system, to the City of Sacramento's lift station (Sump 152) in the southwest corner of the facility. At the lift station, the storm water combines with the City of Sacramento's storm water from the Point West and Arden Mall areas.

To monitor water quality being discharged from the Racing Stable area, Cal Expo proposed the implementation of the following monitoring plan.

- Daily inspections and visual monitoring of the storm water drainage system in Racing Stable area.

- Sampling and analysis of storm water run-off will be conducted a minimum of three times a year from separate storm events. One of these events will be the first significant storm event of the rainy season (October to April). The actual number of sampling events may be modified based on observations and analytical results.

- Each individual storm event sampling will be separated by a minimum of 72 hours.

- The sampling event activity will be conducted within the initial two hours, following the switch from retaining the storm water (initial 42,000-gallons) to direct discharge to the storm water drainage system.

During each sampling event, storm water samples will be conducted from the following locations. These locations are shown in Figure 3.

Location 1: At the basin where storm water is diverted into the CAFO area collection tanks. No sample will be collected until the collection tanks are full and surface storm water run-off is being directly discharged to the storm water drainage system.

Location 2: At the drop inlet in Parking Lot A (west side of Fairgrounds). This location is on Cal Expo's main storm water drainage system line (see Figure 2) and is the last location where storm water from the Cal Expo facility can enter the storm water drainage

system prior to combining with the City of Sacramento's storm water at the lift station.

Location 3: The holding tanks in the Racing Stable area, where the initial 42,000-gallons of storm water is collected.

4.1.1 Storm Water Sample Designation

A standard sample identification (SampID) scheme will be implemented to ensure consistent and unique sample numbers for all sampling locations and events.

Location: Samples will be labeled with the location as identified above, i.e. Location 1.

Season: Samples collected in any particular rainy season (October to April) will be labeled with a two numeric characters of the year in which the rainy season commenced, e.g. samples collected in November 2005 or February 2006, would be labeled "-05".

Event: The sampling event for the particular rainy season, as a two digit numeric character, i.e. -02.

Example: The initial storm water sample collected from Location 3 in December 2006 would be labeled "Location 3-06-01".

In addition to the SampID, all storm water samples will be labeled with the following information.

1. the site location (Cal Expo);
2. the date (M/D/Y) and time (24-hour clock) of sample collection; and
3. the initials of the sampler.

4.1.2 Sample Containers

All samples will be collected in laboratory supplied, pre-cleaned containers, and handled in accordance with EPA specifications for the appropriate methods. No sample containers will be reused. Clean, unused containers will be stored separately from used containers and containers containing samples.

3.1.3 Sample Custody and Documentation

Sample possession during all sampling events must be traceable from the time of sample collection until the results are verified and reported by the laboratory. To ensure sample possession is maintained, a "Chain-of-Custody" form will be prepared and maintained for each sampling event. The "Chain-of-Custody" forms will accompany all transportation and shipping of samples.

4.2 Sample Analysis

All samples collected in the field are subject to field observations and laboratory analysis. All laboratory analyses will be conducted by a California certified laboratory. All collected storm water samples will be analyzed for the following constituents and protocol:

Fecal Coliform (FC): Analysis following standard method SM 9221E

Total Coliform (TC): Analysis following standard method SM 9221E

Biological Oxygen Demand (BOD): Analysis following EPA Method 405.1

Chemical Oxygen Demand (COD): Analysis following EPA Method 410.4

pH: Analysis following EPA Method 150.1

Total Suspended Solids (TSS): Analysis following EPA Method 160 or SM2540D

Nitrates as Nitrogen (N): Analysis following EPA Method 353.2

4.3 Other Activities

In an effort to monitor, control, and minimize potential contaminants from entering the storm water drainage system, other activities will be implemented, continued and documented. These will include the following:

- Routine visual inspections of the Racing Stable waste containment areas. All containment structures e.g. covered areas where all animal related wastes are stockpiled prior to the off-site disposal and the storm water collection system will be inspected, at a minimum, each week throughout the entire year and at least once each 24 hours during storm events.

- Document any actions to correct deficiencies noted as a result of inspections. Deficiencies not corrected within 60 days shall be reported with an explanation of the factors preventing immediate correction.

- Document the storm event and duration of each storm-related discharge that results in an off-property discharge of storm water from the Racing Stable Area.

- Maintain a log of the time and volume of storm water discharges to the sanitary sewer that had been collected in the storm water collection system.

- Ongoing training of Cal Expo personnel, stable hands and any other personnel involved in Racing Stable Area's related activities on the handling of animal related wastes.

- Implementation of additional "street sweeping" events and other cleaning activities on an as needed basis.

- Maintain a record of the disposal of animal waste material.

- Evaluate ongoing evaluation of technologies and construction features that would reduce the potential and volume of contaminants entering the storm water system.

5.0 COMPLIANCE AND REPORTING

5.1 Sampling and Monitoring Summary

To meet the requirements of an Industrial Storm Water Permit, an annual report will be prepared and submitted prior to June 30 of each year. In addition, as the Cal Expo Racing Stable Area is part of the Storm Water Phase II Work Plan prepared under State Water Quality Control Board Water Quality Order No. 2003-0005-DWQ General Permit No. CAS000004, the sampling and analysis data will be duplicated in the Phase II Storm Water annual report. This document has been prepared in a manner that allows it to also be used as a stand-alone document. A copy of this document will be kept at the Fairgrounds Maintenance Office and will be available to any county, state or federal compliance inspection related to the project upon request. Copies will also be supplied to the RWQCB, CCA and any consultant who is retained by Cal Expo involved with the project.

5.2 Training

Cal Expo will train individuals to conduct the sampling. These will include employees of Cal Expo and outside consultants. Training will include, but not limited to, sampling methods and protocols.

5.3 Implementation Schedule

This Storm Water Sampling and Monitoring Plan will be implemented immediately. The initial sampling event will be conducted during the first significant storm event of the 2005-2006 rainy season, when the sampling criteria outlined in section 4.1 is met. Further storm water sampling events will be conducted at times to be determined by Cal Expo personnel.

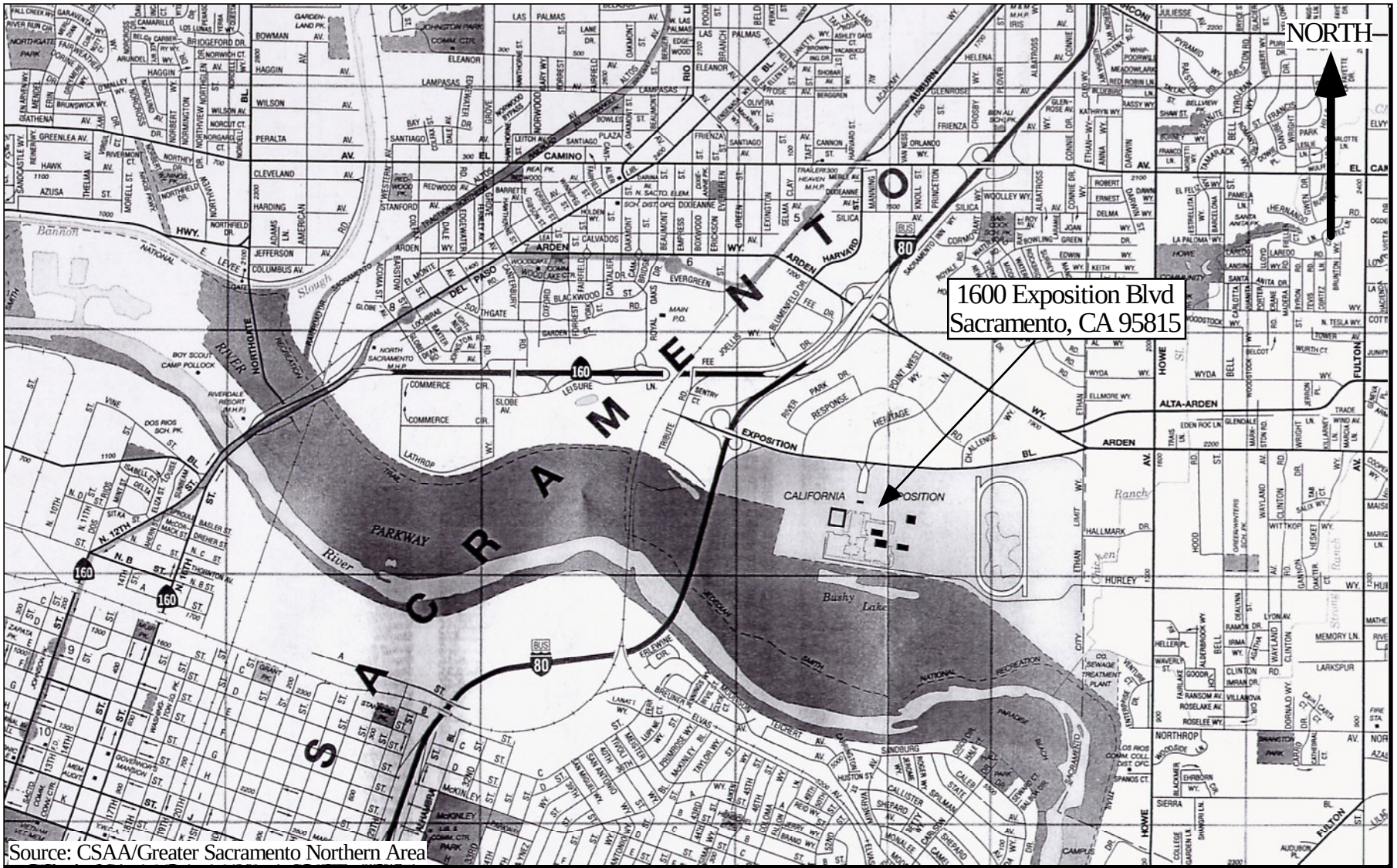
5.4 Reporting

Information related to the storm water sampling will be incorporated into Cal Expo's Phase II Storm Water Annual report. However, if requested by related regulatory agencies, results of any sampling events will be supplied on request. Copies of all reports will be maintained at Cal Expo for a minimum of five years and will be made available to any county, state or federal compliance officer upon reasonable request.

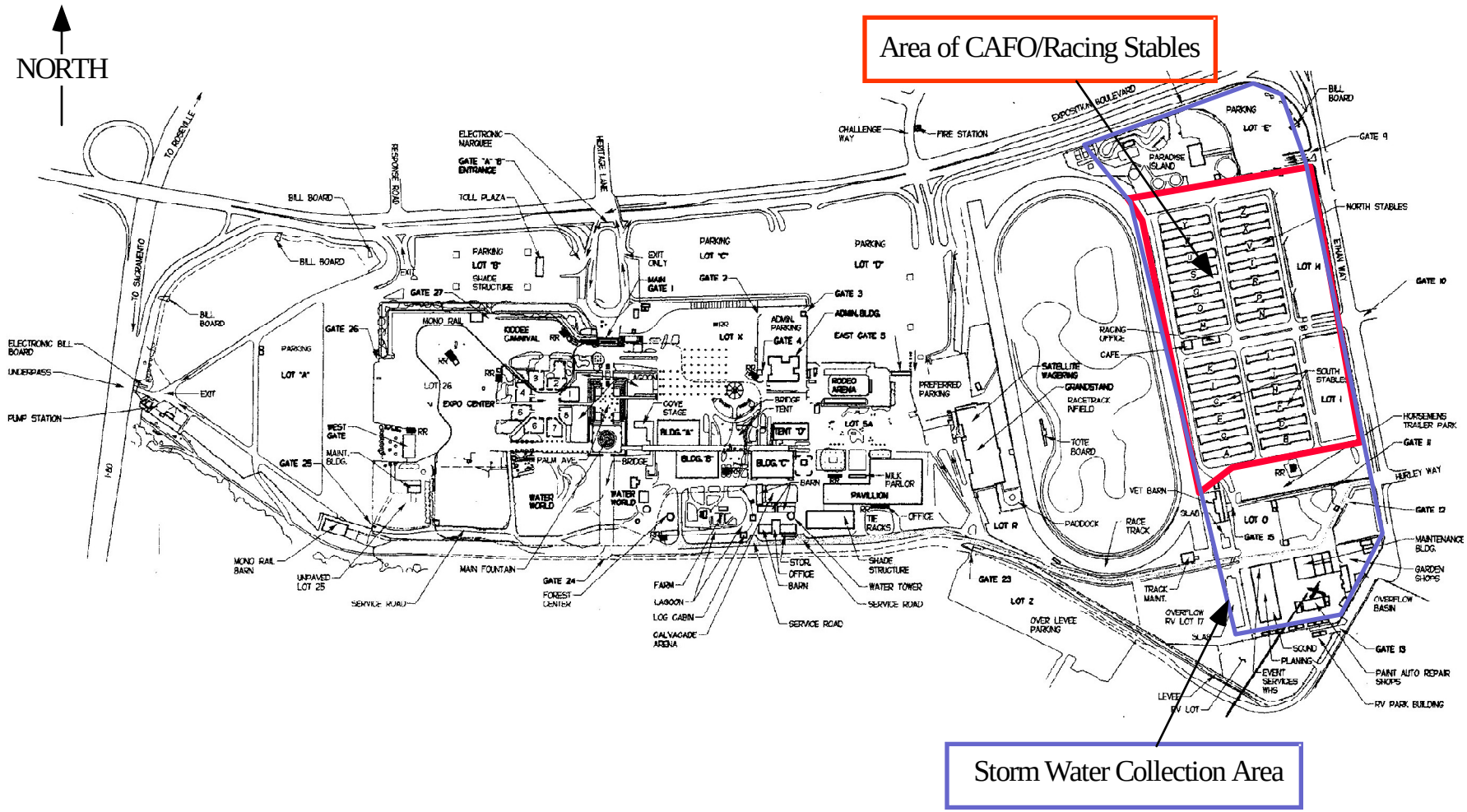
5.5 Provisions for Amendment of this Plan

Amendments to this plan will be made if Cal Expo experiences any changes in operation or the introduction of new BMPs that result in any significant changes in material handling or storage practices which could affect storm water. If sampling and analysis indicate that a particular parameter is not of concern, the future analyses of that parameter may be eliminated. Finally, amendments to this plan may be implemented if

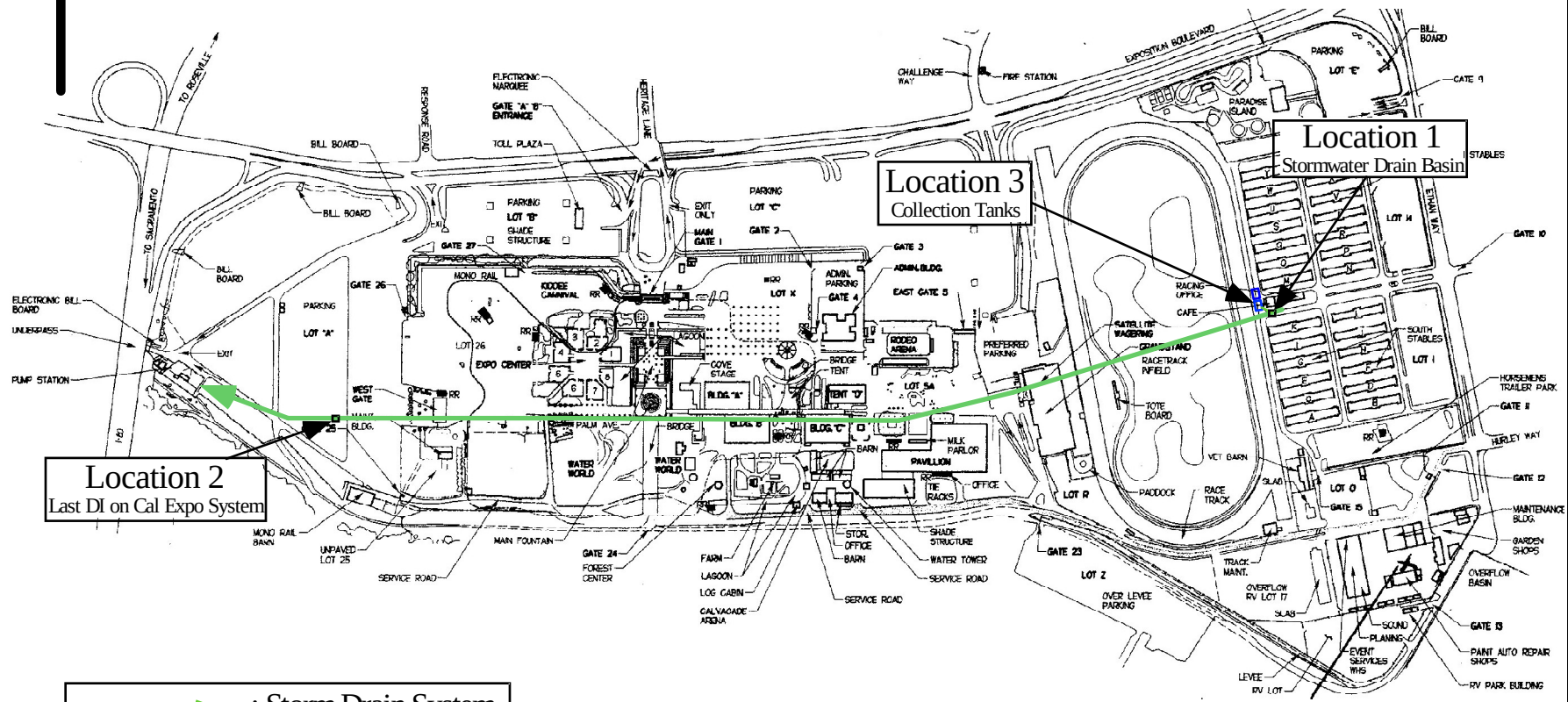
any regulatory agency determines that it is ineffective in controlling pollutants discharge to surface waters.



Scale (approx) 1" = 2,800'	Location of California Exposition & State Fair (Cal Expo) California Exposition & State Fair Sacramento, California	Figure 1



Scale (approx) 1" = 600'	Layout of Cal Expo, showing CAFO/Racing Stables Area California Exposition & State Fair Sacramento, California	Figure 2



Scale (approx) 1" = 600'	Layout of Cal Expo, Storm Water Sampling Locations California Exposition & State Fair Sacramento, California	Figure 3