Draft Revised Storm Water Management Plan Tracy Unified School District Tracy, California

Prepared for:

Tracy Unified School District 1875 West Lowell Avenue Tracy, California 95376



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CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on 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 possibili of fine and imprisonment for knowing violations.				
Del Correr	Dete			
Bob Corsaro,	Date			
Director of Risk Management, Environmental Compliance,				
Facility Use, and Energy Management				

1.0 INTRODUCTION

1.1 REGULATORY BACKGROUND

This Storm Water Management Plan (SWMP) is required under U.S. Environmental Protection Agency (EPA) Phase II storm water regulations, promulgated under the federal Clean Water Act (CWA). These regulations require the Tracy Unified School District (TUSD), Tracy, California to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit. The permit covers storm water discharges associated with the school district's municipally separate storm sewer system (MS4) and requires TUSD to develop a SWMP and report annually on progress. This SWMP outlines activities for the 5 year implementation period which commences following approval of the SWMP by the Regional Water Quality Control Board (RWQCB).

In 1990, U.S. EPA promulgated rules establishing Phase I of the NPDES storm water program. The Phase I program for MS4s requires operators of "medium" and "large" MS4s—that is, those that generally serve populations of 100,000 or greater—to implement a storm water management program as a means to control polluted discharges from these MS4s. The Storm Water Phase II Rule extends coverage of the NPDES storm water program to "small" MS4s including federal and state facilities, but takes a slightly different approach to developing and implementing the storm water management program.

Polluted storm water runoff is often transported to MS4s and ultimately discharged into local waterways (rivers, streams, lakes, and bays) without treatment. U.S. EPA's Storm Water Phase II Final Rule (Final Rule) establishes an MS4 storm water management program intended to improve the nation's waterways. Common storm water pollutants include oil and grease from roadways and parking lots, pesticides from lawns, sediment from construction sites, and trash. These pollutants are deposited into nearby waterways, impacting beneficial uses of the resource and interfering with the habitat for fish, other aquatic organisms, and wildlife.

The California State Water Resources Control Board (SWRCB) regulates discharges to State Waters as established by the Porter-Cologne Water Quality Control Act of 1962, regulated under Title 23 of the California Code of Regulations (CCR). The TUSD is located within the jurisdiction of the RWQCB, Central Valley Region 5S which administers the U.S. EPA NPDES permit program. A SWMP for TUSD has been prepared in response to requirements of the General Phase II Small MS4 Activities Storm Water Permit (General Permit). The General Permit requires applicable dischargers to prepare and implement a SWMP in order to:

- Reduce the discharge of pollutants to the "maximum extent practicable" (MEP);
- Protect water quality; and
- Satisfy the appropriate water quality requirements of the Clean Water Act and RWQCB Basin Plan.

1.2 PURPOSE

This document has been developed to comply with U.S. EPA Phase II NPDES requirements promulgated under the Clean Water Act and complies with the General Permit. In Attachment 3, the General Permit identifies TUSD as a non-traditional MS4. A non-traditional MS4 is defined by the general permit as a entity that operated similarly to a traditional MS4, but is operated at a separate campus or facility. Examples of non-traditional MS4 include, but are not limited to universities, state hospitals, state prisons,

military installations, school districts and other special districts. This SWMP covers 22 school sites as described in Section 2.

The purpose of the SWMP is to (1) identify pollutant sources potentially affecting the quality and quantity of storm water discharges, (2) provide best management practices (BMPs) for municipal and construction activities to reduce contamination in storm water and, (3) provide measurable goals to assess the effectiveness of BMPs that are designed to reduce the discharge of the pollutants into the storm drain system and associated waterways.

1.3 KEY PERSONNEL

Key personnel within the TUSD have provided input into development and implementation of the SWMP. Their contact information is listed below.

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2.0 TRACY UNIFIED SCHOOL DISTRICT

2.1 SITE DESCRIPTION

TUSD consists of <u>23</u> school sites and is located in southwest San Joaquin County in the City of Tracy, California. For the <u>2006/2007</u> school year, the TUSD included <u>18,290</u> faculty, staff and students. <u>The City of Tracy</u> (the City) has experienced substantial growth over the past 20 years and is expected to continue growing through 2025, although not as rapidly given the City's Growth Management Ordinance (City of Tracy, 2006). Table 2-1 presents population statistics for the years 1990 through 2006.

<u>Table 2-1</u> City of Tracy Population from 1990 through 2006

<u>Year</u>	<u>Population</u>
<u> 1 cui</u>	<u>r opulation</u>
1990	32,701
2000	54,700
2001	<u></u>
<u>2001</u>	<u>61,178</u>
<u>2002</u>	<u>65,643</u>
	'
2003	73,250
2006	80.000
<u>2006</u>	<u>~ 80,000</u>

During 2005 and 2006 a total of 626 building permits were issued for new housing units within the City of Tracy. New housing units will continue to generate growth within the school district and require TUSD continually respond with construction of new schools. Currently, student enrollment within TUSD is static; however the District projects the following through 2025: 1) three additional high schools will be constructed; 2) an additional 150 faculty and staff will be hired; and 3) and an additional 2400 students will be enrolled.

2.2 <u>SITE DRAINAGE</u>

Storm water runoff throughout the TUSD is conveyed through city owned storm sewers, open channels and West Side Irrigation (WSID) closed conduits and open channels. The conveyance system diverts all storm water to four outfalls that discharge to Old River and ultimately to the San Joaquin Delta. Due to capacity limitations of WSID facilities, City of Tracy storm water discharges are metered via detention basins prior to discharge to the WSID facilities.

2.3 RECEIVING WATERS

The California Regional Water Quality Control Board, Central Valley Region maintains a list of impaired water bodies titled CWA Section 303(d) List of Water Quality Limited Segment. Water bodies on this list do not meet water quality standards defined within the regional Water Quality Control Plan, even after point sources of pollution have installed the minimum required levels of pollution control technology. Currently, Old River (San Joaquin River to Delta-Mendota Canal) is listed for low dissolved oxygen (State Water Resources Control Board 2006). While a Total Maximum Daily Load (TMDL) action plan has not been initiated to improve water quality along this segment of Old River (TMDL is scheduled for

2019), numerous federal, state, and local efforts are underway to conduct additional research, institute point and non-point source management, and identify solutions to water quality problems in the region.

2.4 CLIMATE

Tracy Unified School District's climate is typical of a "Mediterranean Climate," with fairly mild winters and warm, dry summers. Temperatures range from average winter lows in December of 34 degrees to average summer highs in July of 93 degrees. In winter, low temperatures average 17 degrees, with a record low of 17 in 1998. The summer temperatures are generally over 100 degrees, with a record high of 112 in 1961.

Precipitation usually falls in the late fall, through the winter, and into the spring, with the majority of rain occurring from November to March. The summer is generally dry. The average annual precipitation is 10 inches (256 millimeters). Table 2-2 presents average temperature and precipitation data for the City of Tracy.

<u>Table 2-2</u> <u>City of Tracy Temperature and Precipitation Data</u>

	Temperature	e (degrees	Fahrenheit)	<u>Precipitation</u>
-	Average		Average	Average Depth
<u>Month</u>	<u>High</u>	<u>Mean</u>	Low	(Inches)
<u>January</u>	<u>55</u>	<u>45</u>	<u>35</u>	<u>1.97</u>
February	<u>62</u>	<u>50</u>	<u>38</u>	<u>1.92</u>
<u>March</u>	<u>66</u>	50 54 59 65	<u>41</u>	<u>1.71</u>
<u>April</u>	<u>73</u>	<u>59</u>	<u>44</u>	<u>0.7</u>
<u>May</u>	<u>81</u>		49 53 55 54	<u>0.59</u>
<u>June</u>	<u>88</u>	<u>71</u>	<u>53</u>	<u>0.08</u>
<u>July</u>	<u>93</u>	74 73	<u>55</u>	<u>0.04</u>
<u>August</u>	<u>92</u>	<u>73</u>	<u>54</u>	<u>0.06</u>
<u>September</u>	<u>88</u>	<u>70</u>	<u>52</u>	<u>0.26</u>
<u>October</u>	<u>79</u>	<u>63</u>	<u>47</u>	<u>0.65</u>
November	<u>65</u>	63 53 45	<u>40</u>	<u>1.19</u>
<u>December</u>	<u>55</u>	<u>45</u>	<u>34</u>	<u>1.41</u>

Source: The Weather Channel, Monthly Climatology

2.5 SITE ACTIVITIES AND OPERATIONS

TUSD consists of <u>23</u> traditional school sites and facilities (<u>Table 2-3</u>). Attachment 1 of Appendix 1 presents maps which delineate property boundaries for each of the <u>23</u> school sites and facilities.

Table 2-3
TUSD School Site/Facility Addresses

School Site/Facility	Address
1. District Education Center Complex	1875 West Lowell Ave.
2. District Service Center Complex	1875 West Lowell Ave.
3. Bohn Elementary School (K-5)	350 E. Mount Diablo Ave.
4. Central Elementary (K-5)	1370 Parker Ave.
5. Tracy Learning Center	51 E. Beverly Place
6. Duncan-Russell Continuation High School (10-12) <u>and Willow Community Day School (7-11)</u>	164 W. Grant Line Rd.
7. Freiler (Art) School (K-8)	2421 West Lowell Ave.
8. George and Evelyn Stein High School (10-12)	650 W. 10 th Street
9. Hirsch (Wanda) Elementary School (K-5)	1280 Dove Dr.
10. Jacobson (Melville S.) Elementary School (K-5)	1750 W. Kavanagh Ave.
11. Kelly (George) School (K-8)	535 Mabel Josephine Dr.
12. McKinley Elementary School (K-5)	800 W. Carlton Way
13. McKinley SDC Building	1618 Chester Drive
14. Monte Vista Middle School (6-8)	751 West Lowell Ave.
15. North Elementary School (K-8)	2875 Holly Dr.
16. Poet-Christian (Gladys) School (K-8)	1701 S. Central Ave.
17. South Elementary School (3-5) and West Park Elementary (K-2)	500 W. Mt. Diablo Ave. 501 W. Mt. Oso Road
18. Tracy Adult School	1902 N. Corral Hollow Rd.
19. Tracy High School (9-12)	315 E. 11 th Street
20. Villalovoz Elementary School (K-5)	1550 Cypress Dr.
21. West (Merrill) High School (9-12)	1775 West Lowell Ave
22. Institute for Global Comm. & Govt. (9-12)	1904 N. Corral Hollow Rd.
23. Williams (Earle E.) Middle School (6-8)	1600 Tennis Lane

The <u>23</u> facilities include many of the following activities/operations and facilities:

- Parking lots,
- Recreation fields and playgrounds,
- Food preparation/service facilities,
- Grease traps,
- Loading and unloading areas,
- Trash compactors (every high school and middle school), and
- Science laboratories (every high school and middle school).

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In addition to the common activities listed above, Tracy High School also has the following unique activities/operations:

- Swimming pool,
- Agriculture shop,
- Agriculture fields,
- Composting,
- Auto shop,
- Meat processing facility, and
- Two oil water separators.

Additionally, McKinley Elementary School has a retention basin. Storm water discharges from a parking lot located near the western boundary of the McKinley Elementary School which drains to this retention basin. Storm water is not discharged from this basin.

In addition to the above listed $\underline{23}$ schools sites, which are typical school facilities, the TUSD owns the following properties:

- <u>Delta Island School (K-8)</u>, located at 11022 W. Howard Road, which is not within the Tracy City boundaries, but is located in the City of Stockton. This site does not have any storm drains only dry wells to capture storm water runoff.
- <u>Inter–Faith Ministry</u>, located at 2441 Holly Drive, was originally the district maintenance shop, but is now leased by the TUSD to the Inter–Faith Ministry.
- Old Plunge Site, located at 1515 Holly Drive, was originally a swimming pool, but has been filled in and is now an equipment staging area.

3.0 POTENTIAL SOURCES OF POLLUTION

In order to aid in the identification of activities and sources of potential pollutants of concern, the key personnel that assisted in the development of this SWMP utilized information on historic storm water issues in addition to knowledge of day-to-day operations.

The BMPs identified in Section 5.0 were developed to address the pollutant sources and activities described on Table 3-1 as well as storm water quality entering the TUSD MS4.

Table 3-1 Pollutant Activity/Sources

Activity/Source	Pollutants of Concern	
Agriculture/composting	Bacteria, sediment, fertilizers, pesticides, organic matter, debris	
Building maintenance (washing, graffiti abatement)	Wash water, paint chips, cleaning products, dirt and sediment	
Chemical spills	Various cleaning compounds, diesel, paint, hazardous materials, vehicle fluids	
Construction activities	Concrete, drywall, paint, sediment	
Erosion	Sediment, organic matter	
Food service operations	Wash water, food residue, oil and grease	
Grounds maintenance	Green waste, fuel, oil, pesticides, herbicides, sediment	
Impervious areas	Increased flows and pollutant loading	
Irrigation runoff	Chloramines, fertilizers, pesticides, reclaimed water	
Litter and debris	Litter and debris	
Loading/unloading areas	Petroleum products, fertilizers, pesticides, herbicides, cleaning solutions, paint, litter, food residue	
Outdoor storage of raw materials	Sand, asphalt, soil, pesticides, herbicides, fertilizer, paint, solvents, fuel	
Painting (indoor)	Paint or rinse water (oil and water based), paint thinner	
Parking lot runoff	Oil/grease, litter, heavy metals	
Roof runoff	Particulate matter and associated pollutants	
Sewer line blockages/seepage	Raw sewage	
Trash storage areas	Organic materials, hazardous materials	
Vehicle and equipment washing (staff)	Cleaning products, oil/grease, vehicle fluids	
Utility line maintenance and repairs (water/ irrigation/ sewer)	Chloramines, chlorine, sediment, adhesive cements, primers	

Table 3-1 (continued) Pollutant Activity/Sources

Activity/Source	Pollutants of Concern
Pet feces	Coliform bacteria
Meat processing facility	Organic materials
Vehicle maintenance	Vehicle fluids, oil, hazardous materials
Science laboratories	Chemicals, hazardous waste
Pool facilities	Acid, calcium chloride, sodium bicarbonate, soda ash, chlorinated water
Student Charitable Carwashes	Soil, surfactants (soap/detergents), oil/grease

4.0 MINIMUM CONTROL MEASURES

4.1 MINIMUM CONTROL MEASURES AND BMPS

"Minimum Control Measures" (MCMs) is the term used by the U.S. EPA for the six MS4 program elements aimed at achieving improved water quality. The Final Rule specifies that a Phase II SWMP must include BMPs for the following six MCMs:

- Public Education and Outreach on Storm Water Impacts;
- Public Involvement / Participation;
- Illicit Discharge Detection and Elimination;
- Construction Site Storm Water Runoff Control;
- Post-construction Storm Water Management in New Development and Redevelopment; and,
- Pollution Prevention / Good Housekeeping for Facilities Operation and Maintenance.

The goal of the SWMP is to reduce the discharge of pollutants and to identify activities or structural improvements that help reduce the quantity and improve the quality of the storm water runoff. BMPs have been developed for the SWMP to reduce the discharge of pollutants to the storm drain system. BMPs include treatment controls, operating procedures, and practices to control site runoff, spills and leaks, sludge or waste disposal, or drainage from raw material storage. BMPs will be updated as appropriate to comply with any additions or changes to NPDES permit requirements.

4.2 HOW TO USE BMPS TO MEET PERMIT REQUIREMENTS

The BMPs described in Section 5.0 will be implemented by TUSD staff and outside contractors. Whenever TUSD staff or contractors perform work at TUSD, procedures outlined for each relevant BMP, or other proven technique that reaches the same goal, must be used in order to ensure compliance with storm water discharge regulations.

TUSD has already initiated many of the BMPs listed in Section 5.0 of this SWMP. In some cases the measure has not been formally documented as a written plan or program. The SWMP will document all existing BMPs and outline implementation of additional BMPs. Full development and implementation of BMPs will be completed through the 5-year implementation plan as presented in the following sections.

5.0 DEVELOPMENT AND IMPLEMENTATION OF BMPS

The BMPs will be implemented by TUSD students, parents, faculty, and staff. Implementation will be the responsibility of specific district departments and divisions. Each BMP is associated with one or more of these departments/divisions. The following list of acronyms identifies each department and division that is referenced in the following sections.

- District Education Center **DEC**
- District Service Center **DSC**
- Education Services Division *ESD*
- Facilities, Construction, and Planning Division *FCPD*

Each of the six MCMs contains a BMP implementation table which includes implementation year, description, measurable goal, and the responsible party for each BMP. The Implementation Details and Measurable Goals section follows each BMP implementation table explaining how each BMP will be implemented. Each BMP identified in the following sections address the pollutants listed in Table 3-1 of this document. BMPs will be implemented with the ultimate goal of improving storm water quality entering the TUSD MS4.

5.1 PUBLIC EDUCATION AND OUTREACH ON STORM WATER IMPACTS

The goal of this MCM is to ensure greater public awareness and compliance for the storm water management program. Specifically, this MCM is intended to teach the "public" (students, parents, faculty, and staff) the importance of protecting storm water quality, for the benefit of the environment and human health.

5.1.1 GENERAL PERMIT REQUIREMENTS:

Implement a public education program to distribute educational materials to students, faculty, and staff or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.

 Non-traditional MS4s that discharge into medium and large MS4s may integrate public education and outreach programs with the existing MS4 public education and outreach programs.

Table 5-1 presents selected BMPs for this MCM. The table identifies the current status of each BMP as well as implementation details, implementation year, associated measurable goals, and the district departments/divisions responsible for BMP implementation.

Table 5-1
BMP Implementation: Public Education and Outreach

Year	ВМР	Current Status	BMP Description	Measurable Goal	Responsible party
1	Public outreach/education for faculty and staff.	Currently, the district holds staff development, safety, and site council meetings. The district also posts a "quarterly newsletter", which is sent to students/parents.	The district will coordinate staff development, safety, and site council meetings that will include storm water issues. Publications will be developed to address storm water specific issues.	Ensure and document 100% of all coordination meetings regarding storm water issues, distribute all publications to faculty and staff semi-annually, post two articles in the quarterly newsletter annually.	ESD/All Principals
2	Public outreach/education for students	Currently, the district has science curriculums that can be modified to reflect storm water issues. The district also has service learning programs that may encompass storm water protection.	Modify the existing curriculum to incorporate storm water quality. The district will develop publications to address storm water issues. Distribution will occur through classroom packages, in-class presentations, and web-site postings. Additionally, student charitable carwash educational materials will be developed.	Ensure and document 100% of science curriculums that address storm water issues, distribute all publications to students semi-annually, post two articles in the quarterly newsletter annually.	1
3	Public outreach/education for parents	meetings quarterly. The	The district will coordinate city/district liaison meetings that will include storm water issues. Publications will be developed to address storm water		ESD/All Principals
3	Public education/outreach for district-wide contractors	Currently, the district has no storm water specific training for onsite contractors.	The district will develop a referral mechanism for contractors to obtain storm water education through local, state, or federal training. Referral mechanism may include brochures that include upcoming training dates and locations.	Ensure and document 100% of contractors that have storm water specific training annually.	ESD/All Principals

5.1.2 Implementation Details and Measurable Goals

5.1.2.1 Public Education/Outreach for Faculty and Staff

Implementation Details: First, the district will coordinate and integrate general storm water awareness in the staff development meetings, safety meetings, and site council meetings. Second, publications incorporating storm water education slogans, graphics and issues (i.e., spills, illegal dumping, and other public awareness issues) will be developed by the district. Publications may include posters, calendars, stickers, coloring books, fact sheets, and brochures. Distribution of these publications will be through the

coordination meetings, school specific campaigns, and special events. Finally, the district will develop and post storm water related articles in the quarterly newsletter semi-annually.

Measurable Goal: The district will ensure and document 100% of all coordination meetings that include storm water awareness issues. The district will distribute all publications to faculty and staff semi-annually. Storm water awareness articles will be posted in the quarterly newsletter semi-annually.

5.1.2.2 Public Education/Outreach for Students.

Implementation Details: First, the district will modify existing curriculum to incorporate storm water quality issues, such as pollution prevention and general storm water awareness. Second, the district will develop publications to address storm water issues (i.e., spills, illegal dumping, and other public awareness issues). One example of this includes development of educational materials for student body organizations regarding student charitable carwashes. Currently, TUSD is proposing to develop a policy prohibiting these activities and promoting the use of nearby commercial facilities. Educational materials will be needed to inform students of this policy, their remaining options for conducting charitable carwashes, and the related storm water benefits. Distribution of such materials will occur through classroom packages, in-class presentations, and web-site postings. Finally, the district will develop and post storm water related articles in the quarterly newsletter semi-annually.

Measurable Goal: The district will ensure and document 100% of science curriculums that incorporate storm water issues. The district will distribute all publications to students semi-annually. Storm water awareness articles will be posted in the quarterly newsletter semi-annually.

5.1.2.3 Public Education/Outreach for Parents.

Implementation Details: First, the district will participate in the City/School Liaison meetings and incorporate storm water awareness issues. Second, publications will be developed to address storm water specific issues, such as illegal dumping, spills, and other general storm water awareness issues. Finally, the district will develop and post storm water related articles in the quarterly newsletter semi-annually.

Measurable Goal: The district will ensure and document 100% of all City/School Liaison meetings that include storm water issues. The district will distribute all publications to parents semi-annually via the web site "parents connect", take-home packets, and PTA meetings. Strom water awareness articles will be posted in the quarterly newsletter semi-annually.

5.1.2.4 Public Education/Outreach for District-Wide Contractors.

Implementation Details: The district will develop a mechanism to refer all contractors to local, state, and federal storm water education/training. Referral mechanism will include brochures and fact sheets that identify upcoming training dates and locations. Distribution of these materials will be through contract packages and safety meetings

Measurable Goal: The district will ensure and document 100% of contractors that have storm water specific training on an annual basis.

5.2 PUBLIC INVOLVEMENT/ PARTICIPATION

The goal of this MCM is to foster active public support for the SWMP and direction as to its implementation. Participation by the students, parents, faculty, and staff ensures that the program reflects community goals and priorities and thus has the highest potential for success.

5.2.1 GENERAL PERMIT REQUIREMENTS:

• At a minimum, comply with State and local public notice requirements when implementing a public involvement participation program.

Table 5-2 presents selected BMPs for this MCM. The table identifies the current status of each BMP as well as the implementation details, implementation year, measurable goals, and the district departments/divisions that will be responsible for BMP implementation.

Table 5-2 BMP Implementation: Public Involvement/Participation

Year	ВМР	Current Status	BMP Descriptions	Measurable Goal	Responsible Party
	Storm drain labeling	Currently, there are no storm drain labeling activities.	Develop a program to label all the district storm drains with the slogan "no dumping " (except those drains located in lawns). DEC staff will be responsible for labeling storm drains. This program may be integrated with the adopt-a-drain program.	Label at least 90% of all storm drains at the end of the implementation year 2. Ensure 100% labeled by implementation year 3.	DSC
4	Adopt-a-drain program	Currently, there are no storm drain adoption programs.	Develop a adopt-a-drain program through school specific programs and the "services learning program."	Adopt at least 1 storm drain at each elementary school at the end of implementation year 4.	ESD/All K-5, K-8 Principals
2	Storm water coordination meetings	Currently, the district holds various meetings with staff, faculty, students, and the City of Tracy.	Coordinate and participate in the following meetings: 1) Staff development meeting, 2) safety meetings, 3) site council meetings, 4) city/district liaison meetings, and 5) management team meetings.	Incorporate storm water aspects into meetings at least two times a quarter. Ensure that all coordination meetings will have at a minimum 1 storm water impression annually.	DEC
5	District awareness surveys	Currently there are no surveys being conducted addressing storm water.	Develop survey sheets that will target different audiences in the district. These surveys will be distributed at earth day events, and other environmental events.	Complete at least 200 individual surveys by implementation year 5.	DEC
2	DEC Storm Water Hotline	Currently there are no storm water specific phone numbers.	Provide the DEC front desk phone number to field and refer water quality related questions. The number will be posted on the web site, newsletters, and school front offices. DEC front desk staff will be provided a referral form to fill out while fielding phone calls.	Document the number of water related calls through referral forms annually.	DEC

Table 5-2 (Continued) BMP Implementation: Public Involvement/Participation

Year	ВМР	Current Status	BMP Descriptions	Measurable Goal	Responsible Party
3	special events	Currently each school implements their own special events and campaigns. Events include cleanup days, environmental days, and other environmental awareness activities.	Include storm water aspects into future and existing school specific special events and campaigns. The district will track school specific special event activities.	Ensure and document storm water aspects are incorporated into each schools special events and campaigns semi-annually.	ESD/All Principals
1	Storm Water	TUSD utilizes public forums for ensuring the staff, teachers, parents, and students have adequate opportunity to provide comment on proposed TUSD policies.	TUSD will schedule public forums for all proposed storm water policies. Public forums will be posted on the TUSD website, within applicable district handouts, and within the appropriate City of Tracy newspapers.	Ensure one public forum is held for the development of each TUSD storm water policy and document public comments received.	<u>DEC</u>
1			Incorporate details of the TUSD storm water management program on the website including a link to the SWMP.	Provide access to the SWMP for 60-day public review upon notice from the RWQCB that the SWMP is complete.	DEC/ESD

5.2.2 Implementation Details and Measurable Goals

5.2.2.1 Storm Drain Labeling

Implementation Details: The district will develop a program to label all the district storm drains with the slogan "no dumping" (except those drains located in lawns). Labels will be designed, procured, and placed by DEC staff. This program may be integrated with the adopt-a-drain program.

Measurable Goal: The district will label at least 90% of all storm drains at the end of implementation year 2. Additionally, the district will ensure that 100% of the storm drains are labeled by implementation year 3.

5.2.2.2 Adopt-a Drain Program

Implementation Details: The district will develop an "adopt-a-drain" program through school specific programs and the "services learning program." The "adopt-a-drain" program will involve students, faculty, and district staff coordination in an effort to maintain school storm drains while providing a hands on approach to storm water education. The adopt-a-drain program will also involve storm drain inspections and labeling.

Measurable Goal: The district will ensure that one storm drain will be adopted at each school site by the end of implementation year 4.

5.2.2.3 Storm Water Coordination Meetings

Implementation Details: The district will coordinate and participate with the following meetings: 1) Staff development meeting, 2) safety meetings, 3) site council meetings, 4) city/district liaison meetings, and 5) management team meetings. Each of the meetings will incorporate storm water issues, such as illegal dumping, pollution prevention practices, and general storm water awareness. Additionally, a TUSD DSC representative will attend the San Joaquin County Phase II Partnership Meetings attended by other municipalities to share resources and knowledge.

Measurable Goal: The district will incorporate storm water aspects into any of the above listed meetings once a quarter. The district will ensure that all five coordination meetings have at a minimum 1 storm water impression annually.

5.2.2.4 District Awareness Surveys

The district will develop survey sheets that will target different audiences in the district. These surveys will be distributed at specials school day events, coordination meetings, and other environmental events. The surveys will include questions on general storm water awareness, for example the difference between a storm drain and a sanitary sewer drain. The surveys will be compiled by the DEC.

Measurable Goal: The district will complete at least 200 individual surveys by implementation year 5.

5.2.2.5 DEC Storm Water Hotline

The district will provide the DEC front desk phone number to track and refer water quality related questions, comments, and concerns. The phone number will be posted on the web site, newsletters, and school front offices. The DEC front desk staff will be provided with a referral form to track phone calls. The referral form will include brief questions in order to refer the storm water issue to proper district staff and maintain a formal tracking mechanism for phone calls.

Measurable Goal: The district will document the number of storm water related calls through referral forms annually.

5.2.2.6 School Specific Special Events

Implementation Details: The TUSD will assist each school in developing storm water related aspects into future and existing school special events and campaigns. Special events that incorporate storm water aspects have the ultimate goal of gaining support for reducing pollutants of concern in storm water runoff while promoting public involvement and participation. Examples of future and existing school special events and campaigns may include the following:

- April Keep America Beautiful Month
- Earth Day
- Arbor Day
- Campus Clean-up Day
- Bay or Slough Clean-up Day

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- Recycling Drive
- Community Open House
- Possible Sources for acquiring storm water education materials include:
 - 1. State Water Resources Control Board Water Education
 - 2. County of San Joaquin Public Works Department Storm Water Division

Measurable Goal: The district will ensure and track special events and campaigns that include storm water related aspects semi-annually.

5.2.2.7 Storm Water Policy Public Forums

Implementation Details: TUSD will facilitate and schedule public forums for all proposed storm water policies in order to promote public participation and awareness. Public forums will be posted on the TUSD website, within applicable district handouts, and within the appropriate City of Tracy newspapers to assure students, staff, faculty, and parents are aware of the forum.

Measurable Goal: TUSD will ensure a public forum is held for each proposed storm water policy. Comments received at public forums will be documented and considered during policy revision.

5.2.2.8 TUSD Website

Implementation Details: TUSD will incorporate details of the TUSD storm water management program on the website including hyperlinks to provide comment on the District SWMP, applicable resource agencies, and sources for storm water pollution prevention outreach. Storm Water Management Plan Annual Reports will also be posted to the website upon their completion. Contact information (phone number and email) for key personnel and DEC Storm Water Hotline will be included on the website enabling faculty, staff, and students the opportunity to communicate their concerns, questions, and viewpoints regarding the TUSD SWMP and associated storm water management policies.

Measurable Goal: Upon notice from the RWQCB that the SWMP is complete, the SWMP will be posted on the TUSD website for 60-day public review. The TUSD website will be updated annually to ensure the most accurate information and outreach materials regarding the SWMP are made available to the public.

5.3 ILLICIT DISCHARGE DETECTION AND ELIMINATION

The goal of this MCM is to reduce pollutants in storm water runoff to receiving waters. It requires the development and implementation of a system to identify and eliminate sources of illicit discharge and illegal dumping.

5.3.1 GENERAL PERMIT REQUIREMENTS:

• Develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at 40 Code of Federal Regulations (CFR) § 122.26(b)(2)) into the district.

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- Develop, if not already completed, a storm sewer system map showing the location of all outfalls and the names and locations of all waters of the U.S. that receive discharges from those outfalls.
- To the extent allowable under state or local law, effectively prohibit, through ordinance or other regulatory mechanism, non-storm water discharges into the district and implement appropriate enforcement procedures and actions.
- Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit.
- Inform students, parents, faculty, and staff of the hazards that are generally associated with illegal discharges and improper disposal of waste.
- Address categories, as outlined in the permit, of non–storm water discharge or flows only if identified as significant contributors of pollutants to the district.

Table 5-3 presents selected BMPs for this MCM. The table identifies the current status of each BMP as well as implementation details, implementation year, associated measurable goals, and the district departments/divisions responsible for BMP implementation.

Table 5-3
BMP Implementation: Illicit Discharge Detection and Elimination

	20.50	a			Responsible
Year	BMP	Current Status	BMP Description	Measurable Goal	party.
1	Separate Storm Sewer System Mapping	be updated to identify storm drains, outfall locations, waters of the U.S. locations, and flow direction.	Augment the existing site maps to identify flow direction, storm drain, outfall, and U.S. water locations.	The storm water conveyance maps will be created by implementation year 1 and will be updated semi-annually.	DEC
3	Storm drain and outfall inspections	Currently, custodial staff conducts a daily yard inspection to identify litter, broken glass, and other safety issues.	Modify the custodial daily yard inspection checklists to include visual observations of storm drains and outfalls. The daily checklists are submitted to the DEC monthly.	Ensure and document at least 90% of all storm drains and outfalls inspections annually.	DEC/DSC
3	Visual Inspections Tracking	Currently the custodial staff has formalized checklists to track daily yard inspections.	The district will retain the daily inspections checklists in a binder or database. The district will track these inspections on a monthly basis.	Ensure and document at least 90% of all yard inspections tracked annually.	DEC
3	Non-storm water discharge program	The daily yard inspections checklists will be modified to include visual observations of non-storm water discharges.	DEC.	Ensure and document at least 90% of all yards inspected for non-storm water discharges annually.	DEC/DSC
	Storm water training for custodians	Currently custodial, food service, and ground maintenance staff are required to attend safety meetings. Each safety meeting is tailored per target audience and is scheduled at various times throughout the year.	Modify appropriate meetings to include storm water issues. Track all safety meetings that incorporate storm water education. The district will retain copies of the meeting agendas.	At least 20% of all custodial staff will be trained on an annual basis. Ensure that 100% of all staff will be trained by implementation year 5.	DEC
4	Posting signage in public use areas	Currently, there is no signage for addressing illegal dumping in public use areas.	Develop signage addressing illegal dumping, litter, storm water protection. The signs will include the water hotline for reporting. Enforcement will be the responsibility of the DEC who will be fielding the hotline calls. Issues will be referred to the city code enforcement at the discretion of the DEC staff. Public use areas may include, play grounds, blacktop areas, and parking lots.	100% of all public use school areas will have a posted signage addressing storm water protection and illegal dumping at the end of implementation year 3.	DEC
2	Storm Water Policy	Currently the district does not have a storm water policy.	The district will develop a storm water policy. The policy will address illegal discharges, illegal dumping, and identified unauthorized non-storm water discharges. Progressive/escalating enforcement measures will accompany this policy.	The policy will be developed by implementation year 2	DEC

5.3.2 Implementation Details and Measurable Goals

5.3.2.1 Separate Storm Sewer System Mapping

Implementation Details: The district will modify the existing site maps to identify storm drain locations, outfall locations, U.S. water locations, and flow direction for the 22 jurisdictional school sites.

Measurable Goal: The storm water conveyance maps will be created by implementation year 1 and will be updated semi-annually.

5.3.2.2 Storm Drain and Outfall Inspections

Implementation Details: The district will modify the custodial daily yard inspection checklists to include visual observations of storm drains and outfalls. Visual observations will be conducted by identifying excessive debris, spills, or illegal discharges. The daily checklists are submitted to the DEC monthly.

Measurable Goal: The district will ensure and document at least 90% of all storm drains and outfalls inspections annually. Tracking will occur through monthly submittals of the daily checklists.

5.3.2.3 Visual Inspections Tracking

Implementation Details: The district will retain the daily inspections checklists in a binder or database. The database and/or binder will be maintained by the district and retained at the DEC. The district will track these inspections on a monthly basis.

Measurable Goal: The district will ensure and document at least 90% of all yard inspections tracked annually.

5.3.2.4 Non-Storm Water Discharge Program

Implementation Details: The district custodial staff will submit the daily inspections checklists monthly to the DEC. The daily checklists will be modified to incorporate the identification of the non–storm water discharges identified in Section D.2.c.6 of the General Permit. The checklist will also include the identification of the illegal discharges, debris, and potential pollutants of concern. Tracking of the checklists will be conducted by the district and retained at the DEC.

Measurable Goal: The district will ensure and document at least 90% of all yards inspected for non-storm water discharges annually.

5.3.2.5 Storm Water Training for Custodian

Implementation Details: The district will modify the existing safety meetings to include storm water issues. The district will track the existing safety meetings through agendas and sign-in sheets. Agendas and/or sign in sheets will be retained at the DEC.

Measurable Goals: The district will ensure and document that 20% of all custodial staff will be trained annually. The district will also ensure that 100% of all staff will be trained by implementation year 5.

5.3.2.6 Posting Signage for Public Use Areas

Implementation Details: The district will develop signage to address illegal dumping, litter, and storm water protection. The signs will have the DEC storm water hotline for reporting. Enforcement will be the responsibility of the DEC fielding the hotline calls. Issues will be referred to City Code Enforcement officers at the discretion of DEC staff. Public use areas may include, play grounds, blacktop areas, and parking lots.

Measurable Goal: The district will ensure that 100% of all public use school areas will have a posted signage addressing storm water protection and illegal dumping at the end of implementation year 3.

5.3.2.7 Storm Water Policy

Implementation Details: The district will develop a storm water policy. The policy will address illegal discharges, illegal dumping, and identified unauthorized non-storm water discharges. The policy will also identify an enforcement escalation mechanism to address situations of non-compliance. For example, the mechanism may include verbal warnings, written warnings, and referrals to City Code Enforcement.

Measurable Goal: The district will develop a policy by implementation year $\underline{2}$.

5.4 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

The goal of this MCM is to prevent sediment and construction waste at construction sites from entering the storm water conveyance system. To better achieve these goals, TUSD will comply with the Construction Storm Water General Permit, attempt to assure construction activities are completed by October 1 of each year, and at a minimum ensure that all graded land be protected from wind and water with an effective combination of erosion and sediment control BMPs to the MEP.

5.4.1 GENERAL PERMIT REQUIREMENTS:

- Develop and implement an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions or other effective mechanisms, to ensure compliance, to the extent allowable under State or local law.
- Develop and implement requirements for construction site operators to implement appropriate erosion and sediment control BMPs.
- Develop and implement requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.
- Develop and implement procedures for site plan review that incorporate consideration of potential water quality impacts.
- Develop and implement procedures for receipt and consideration of information submitted by the public.
- Develop and implement procedures for site inspection and enforcement of control measures.

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Table 5-4 presents selected BMPs for this MCM. The table identifies the current status of each BMP as well as implementation details, implementation year, associated measurable goals, and district departments/divisions responsible for BMP implementation.

Table 5-4
BMP Implementation: Construction Site Storm Water Runoff Control

Year	ВМР	Current Status	BMP Description	Measurable Goal	Responsible Party
2	Construction site inspections	Currently the DSA inspectors are contracted to conduct inspections for structural, erosion and sediment controls.	Track construction site inspections conducted by the DSA. The district will track the inspection checklists on a database identifying the dates inspected, ESC controls found onsite, NOI #, Contact information	Perform biweekly inspections during the dry season and weekly inspections during the rainy season.	FPCD
2	Public comment receipt for construction activities	Currently the district does not have a construction public	Modify the phone number to contact the DEC office. Front office personnel will be trained to deal with storm water calls and will be equipped with referral forms. The hotline number will be posted at the construction site as well as the web site.	through referral	FPCD
2	Contract specifications through bid package	Currently contract language is in place. Contract language discusses ESC controls for all school construction projects.	Contract language will be in place for all contracts between the District and construction contractor. Contracts will be updated annually. Contracts will include language regarding waste materials, nonstorm water discharges, illegal dumping, spill containment, erosion and sediment controls, and BMP maintenance. Contract language will include enforcement actions for occurrences of non-compliance. Bid packages will require contractor training for storm water issues.	Ensure and document at least 100% of all contracts given to construction contractors annually.	FPCD
4	DSA inspectors training	DSA may have their own storm water training process. Training should occur to the checklist used on- site for ESC and construction waste control.	The District will track DSA inspector training regarding storm water construction controls, waste, ESC, spills, and other issues.	Ensure and document 100% of all DSA inspectors' storm water training.	FPCD
3	Construction Plan review	Occurs at the DSA level for all school districts	Develop a mechanism to review storm water controls and designs from architect submittal prior to submittal to DSA for "stamp out."	Document 100% of all plans submitted to the DSA are reviewed by the district.	
1	Storm Water Policy	Currently the district does not have a storm water policy in place.	The district will develop a storm water policy. The policy will address erosion and sediment controls, waste management, spills, and unauthorized non-storm water discharges.	The policy will be developed by implementation year 1	DEC

5.4.2 Implementation Detail and Measurable Goals

5.4.2.1 Construction Site Inspections:

Implementation Details: The district will track construction site inspections conducted by the DSA. The program will consist of using a Microsoft Excel spreadsheet or Microsoft Access database to track the following information:

- Site name.
- Site owner, contact information.
- Site acreage.
- Notice of Intent (NOI) filing date and WDID#.
- Dates inspected.
- Notice of Termination (NOT) filing date.
- Comments.

To maintain quality control and quality assurance of the tracking system, TUSD will compare its construction database to the RWQCB construction database. This comparison will help determine the accuracy and inclusiveness of the TUSD tracking database. <u>Lastly, a TUSD representative will conduct inspections of construction sites for storm water pollution prevention measures and to ensure the site Storm Water Pollution Prevention Plan, if applicable, is on site and effectively implemented. Written procedures and inspection checklists will be developed and used by the District to ensure consistent compliance with TUSD's proposed updates to construction contract specifications and the Construction Storm Water General Permit</u>

Measurable Goal: The district will <u>perform bi-weekly inspections during the dry season and weekly</u> inspections during the rainy season of all construction sites.

5.4.2.2 Public Comments Receipt for Construction Activities:

Implementation Details: The district will provide the DEC front office phone number as the hotline. Front office personnel will be included in storm water awareness training and will be knowledgeable to deal with storm water calls. Front desk staff will also be equipped with referral forms indicating various issues, such as illegal spills, construction waste, issues of noncompliance. The hotline number will be posted at the construction site as well as the web site.

Measurable Goal: The district will document the number of storm water related calls through referral forms. The district will document 100% of all calls related to construction.

5.4.2.3 Construction Contract Specifications:

Implementation Details: The district will develop and implement storm water specific contract language for all hired construction contractors. Contracts will include language regarding waste materials, non-

storm water discharges, illegal dumping, spill containment, erosion and sediment controls, and BMP maintenance. Contract language will include enforcement actions for occurrences of non-compliance. Contracts will be updated annually

Measurable Goal: The district will ensure and document annually 100% of all contracts provided to construction contractors that contains storm water specific language.

5.4.2.4 DSA Inspectors Training:

Implementation Details: The district will track DSA inspector training regarding storm water construction controls, waste, ESC, spills, and other issues. Tracking will be included in the construction inspections tracking database.

Measurable Goal: The district will ensure and document 100% of all DSA inspectors' storm water training.

5.4.2.5 Construction Plan Review:

Implementation Details: The district will develop a mechanism to review storm water controls and design from architect submittal prior submittal to DSA for "stamp out." The district will implement a plan review and pre-design meeting with the architect to discuss storm water issues. Plans will be reviewed for post-construction considerations, erosion and sediment control feasibility, and other storm water considerations.

Measurable Goals: The district will document 100% of all plans submitted and reviewed.

5.4.2.6 Storm Water Policy:

Implementation Details: The district <u>and its contractors will comply with the Construction Storm Water General Permit.</u> To strengthen and ensure compliance with this statement a district-wide storm water policy <u>will be developed and shall require</u> erosion and sediment controls, waste management, spills, and unauthorized non-storm water discharges. The storm water policy will also address occurrences of noncompliance, associated enforcement actions, and referral to City Code Enforcement.

Measurable Goals: The policy will be developed by implementation year $\underline{1}$.

5.5 POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

Projects subject to the post-construction minimum control measure are new development and redevelopment projects that disturb 1 acre or greater including projects less than 1 acre that are part of a greater common plan. New developments are defined as "land disturbing activities; structural development, including construction or installation of a building or structure, creation of impervious surfaces; and land subdivision (Attachment 9 of the General Permit)." Redevelopment is defined as "an already developed site, the creation or addition of at least 5,000 square feet of impervious area (Attachment 9 of the General Permit)."

The goal for this MCM is to reduce non-point source pollution from the effects of hydromodification and urban runoff through planning and design, prior to development or re-development. Hydromodification is the change in the runoff hydrograph (flow pattern) from an area due to development. Impacts of land

development typically include 1) an increase in impervious surface; 2) decrease in amount of vegetation; 3) grading and compaction of soils; and 4) construction of drainage facilities. Typical effects of land development on the site runoff hydrograph include 1) less infiltration/evapotranspiration; 2) more surface runoff (increased volume); 3) increase in runoff peak flows; 4) increased duration of runoff; and 5) runoff being directly conveyed to creek. TUSD will incorporate hydromodification BMPs into new development and redevelopment projects intended to minimize the effects of increased urban runoff volume, peak flows, and duration. Where applicable, TUSD will also consider the utilizing accumulated non-potable storm water for irrigation of vegetated areas (e.g. sports fields, landscaping).

Post-construction runoff control focuses on site and design considerations, which are most effective when addressed in the planning and design stages of project development. Effective long-term management and maintenance are critical, so the best design opportunities are those needing the least amount of maintenance. The goal of the program is to integrate basic and practical storm water management controls into new development and re-development to protect water quality. Post-construction storm water management controls include permanent structural and non-structural BMPs (e.g., conservation of natural and permeable areas, permeable pavers, rooftop runoff infiltration galleries, and mechanical storm drain filters) that remain in place after the project is completed.

The General Permit does not require redesign of K-12 schools that have submitted to the Division of the State Architect before the adoption of the permit, and which receive final approval from the State Allocation Board before December 31, 2004.

5.5.1 GENERAL PERMIT REQUIREMENTS:

- Develop, implement, and enforce a program to address storm water runoff from new
 development and redevelopment projects that disturb greater than or equal to one acre,
 including projects less than one that are part of a larger common plan of development or
 sale, that discharge into the district by ensuring that controls are in place that would
 prevent or minimize water quality impacts.
- Develop and implement strategies which include a combination of structural and/or nonstructural BMPs appropriate for the district.
- Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law.
- Ensure adequate long-term operation and maintenance of BMPs.

Table 5-5 presents selected BMPs for this MCM. The table identifies the current status of each BMP as well as implementation details, implementation year, associated measurable goals, and the district departments/divisions responsible for BMP implementation.

Table 5-5
BMP Implementation: Post-Construction Storm Water

					Responsible
Year	BMP	Current Status	BMP Description	Measurable Goal	Party.
<u>3</u>	Develop a post-	TUSD reviews all plans for	Develop a process for review	Ensure all applicable	<u>FPCD</u>
	construction runoff	adherence to federal, state,	of architectural and	projects are designed	
	control program to	and local building and health	construction site plans that	appropriately to prevent	
	minimize water quality	codes.	will evaluate the potential	or minimize water	
	impacts from		impact to water quality.	quality impacts to the	
	<u>hydromodification</u>		Condition projects with	maximum extent	
			hydromodification BMPs	practicable.	
			where necessary.		
2	Design storm water	Contract language is in place	Develop and expand existing	Document 100% of all	FPCD
	specific contract	for the District hired	design standards language in	contracts that include	
	specifications for long-	architect.	contracts for new development	storm water runoff	
	term maintenance		and redevelopment projects	control language	
			which will include runoff	provided to architects.	
			controls and erosion and	•	
			sediment BMPs. The		
			language should be modified		
			to address long-term BMPs		
			and maintenance.		
1	Track impervious	The district currently tracks	Include the review of	Update and document	FPCD
	surfaces	square footage of	impervious surfaces in the	100% of all impervious	1102
	Surraces	iurisdictional school areas.	construction database. Track	surfaces annually.	
		jurisaretronar senoor areas.	impervious surface by square	surraces annually.	
			foot.		
			1001.		
2	Storm Water Policy	Currently the district does	The district will develop a	The policy will be	DEC
		not have a storm water	storm water policy. The	developed by	
		policy in place.	policy will address polluted	implementation year 2	
		_	storm water runoff, spills,		
			long-term maintenance of		
			post-construction BMPs.		
			•		

5.5.2 Implementation Details and Measurable Goals

5.5.2.1 Develop Post-Construction Runoff Control Program

Implementation Details: The District will develop a program and process for reviewing all applicable new development and redevelopment projects for impact to water quality. Where necessary, TUSD will condition projects with a combination of structural and non-structural BMPs intended to prevent or minimize storm water pollution. Review and conditioning of architectural and constructions site plans will be documented prior to submittal with the California Department of General Services, Division of the State Architect

Measurable Goal: TUSD will ensure all applicable projects are designed appropriately to prevent or minimize water quality impacts to the maximum extent practicable.

5.5.2.2 Design Contract Specifications for Long-term Maintenance.

Implementation Details: The district will develop design standards language in contracts for construction sites. The language will include conditions requiring runoff controls, erosion and sediment controls, as well as construction waste controls.

Measurable Goal: The district will document 100% of all contracts that include storm water runoff control language provided to architects.

5.5.2.3 Track Impervious Surfaces:

Implementation Details: The district shall include the review of impervious surfaces in the construction database. The district will track the existing impervious surfaces on an annual basis. Impervious surface will be tracked by square foot.

Measurable Goal: The district will update and document 100% of all impervious surfaces annually.

5.5.2.4 Storm Water Policy:

Implementation Details: The district will develop a storm water policy. The policy will address polluted storm water runoff, spills, long-term maintenance of post-construction BMPs and shall include an enforcement mechanism to address occurrences of non-compliance. Enforcement actions may include referral to the City Code Enforcement.

Measurable Goals: The district will develop the storm water policy by implementation year $\underline{2}$.

5.6 POLLUTION PREVENTION / GOOD HOUSEKEEPING FOR FACILITIES OPERATION AND MAINTENANCE

The goal of this MCM is to assure that district facility operations and maintenance activities occur in a manner protective of storm water quality.

5.6.1 GENERAL PERMIT REQUIREMENTS:

- Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from the district operations.
- Using training materials that are available from EPA, the State, or other organizations, include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet building maintenance, new construction and land disturbances, and storm water system maintenance.

Table 5-6 presents selected BMPs for this MCM. The table identifies the current status of each BMP as well as implementation details, implementation year, associated measurable goals and the district departments/divisions responsible for BMP implementation.

Table 5-6
BMP Implementation: Pollution Prevention/Good Housekeeping

Year	BMP	Current Status	BMP Descriptions	Measurable Goal	Responsible Party.
1	Centralized district automobile maintenance and car washing	Currently district vehicles and equipment is washed and stored at the DSC facility.	The district will continue to educate district staff to wash district owned vehicles at the designated DSC locations.	Ensure and document 100 % of district owned vehicles maintenance and washing.	DSC
1	Custodial and O&M staff training	Currently the district holds mandatory safety meetings for custodial, food services, and grounds maintenance staff.	The district will modify the existing mandatory safety meetings to address storm water controls, oil/water separators, grease traps inspections, trash bin exposure, trash compacting procedures, spill containment and cleanup, wash water disposal, as well as other operations and maintenance activities.	Include storm water issues in a minimum of 4 safety meetings annually.	DEC
3	Storm drain inspections/clean out	Currently, custodial staff conducts a daily yard inspection. Yard inspections to identify litter, broken glass, and other safety issues.	Modify the custodial daily yard inspection checklists to include visual observations of storm drains and outfalls. The daily checklists are submitted to the DEC monthly.	document at least 90% of all storm drains and outfalls will be inspected annually.	DEC/DSC
1	Ensure compliance with the Storm Water Industrial Permit.	Currently the district has a permitted transportation facility located in the DSC. The facility has been permitted since 1992 and is in compliance with the Industrial General Permit.	The district will update the Industrial Facility SWPPP annually, submit annual reports, conduct internal annual facility inspections, and collect two storm water samples per wet season.	Update the SWPPP annually, submit annual reports, conduct annual facility inspections, and collect two storm water samples per wet season.	DSC
3	Used oil recycling program	Currently the recycling programs are conduct at the DSC facility.	The district will use the existing program to track the amount of used oil recycled.	Document the total volume of oil recycled annually.	DSC
4	Sanitary Sewer Overflow (SSO) Inventory	Currently there is no inventory for the grease traps, oil water separators, and other devices with the potential for a SSO.	Develop and inventory of all the grease traps and oil/water separators. The inventory may account for inspections with county health to assess the status of the grease traps and oil/water separators.	Inventory 100% of all possible SSO devises.	DEC/DSC
1	School spill kit campaign	Currently each school does not have any controls to address potential spills.	The district will procure small spill kit packages for each school to be used by custodial staff in spill occurrences.	Ensure and document 100% of all schools have spill kits by implementation year 1.	DEC/DSC

5.6.2 Implementation details and Measurable Goals

5.6.2.1 Centralized District Automobile Maintenance and Vehicle Washing:

Implementation Details: The district will continue to educate district staff to wash district owned vehicles at the designated DSC locations. The message will be disseminated through staff newsletters, safety meetings, and mass e-mails (as appropriate).

Measurable Goal: The district will ensure and document 100 % of district owned vehicles maintenance and washing. Tracking will occur through maintenance logs.

5.6.2.2 Custodial, Operations, and Maintenance Staff Training:

Implementation Details: The district will modify the existing mandatory safety meetings to address storm water controls, oil/water separator inspections, grease trap inspections, trash bin exposure issues, trash compacting procedures, spill containment and cleanup, wash water disposal (i.e., mop water, floor cleaning water), as well as other operations and maintenance activities.

Measurable Goal: The district will include at a minimum storm water issues in 4 safety meetings annually.

5.6.2.3 Storm Drain Inspections/Clean Out

Implementation Details: The district will modify the custodial daily yard inspection checklists to include visual observations of storm drains and outfalls. Inspections will include identification of debris, obstructions, illegal spills, or signs of illegal discharges. The daily logs will also include actions taken to clean storm drains. The daily checklists are submitted to the DEC monthly.

Measurable Goals: The district will ensure and document at least 90% of all storm drains and outfalls inspected annually.

5.6.2.4 Ensure Compliance with the Industrial General Permit:

Implementation Details: The district will update the Industrial Facility SWPPP annually, submit annual reports, conduct annual facility inspections, and collect two storm water samples per wet season. Although, these tasks are required under the Industrial General Permit (CAS000001), the district services center implements current BMPs.

Measurable Goal: The district shall update the SWPPP annually, submit annual reports, conduct annual facility inspections, and collect two storm water samples per wet season.

5.6.2.5 Used Oil Recylce Program:

Implementation Details: The district will use the existing program to track the amount of used oil recycled annually. Although the used oil program in regulated under a different program, the district will account for the indirect improvement to water quality by ensuring that the used oil is stored, hauled, and documented in the proper manner.

Measurable Goal: The district will document the total volume of oil recycled annually.

5.6.2.6 Regular SSO Inventory:

Implementation Details: The district will develop and inventory all grease traps and oil/water separators located within the jurisdiction of TUSD. The inventory may account for inspections with county health to assess the status of the grease traps and oil/water separators.

Measurable Goal: The district will inventory 100% of all possible SSO devises (i.e., grease traps, oil/water separators).

5.6.2.7 School Spill Kit Campaign:

Implementation Details: The District will procure small spill kit packages for each school to be used by custodial staff in spill occurrences. Training associated with the use of these spill kits will be covered during faculty and staff training.

Measurable Goal: TUSD will ensure all schools have a small spill kit by the end of implementation year 1.

6.0 RECORD KEEPING

6.1 SWMP REVISIONS

The SWMP will be reviewed annually and updated whenever there are changes in activities or operations that may significantly affect the discharge of storm water pollutants. Given the fact TUSD discharges storm water to the City of Tracy which subsequently discharges storm water to the WSID, the City and WSID will be provided the opportunity to review this SWMP. TUSD will update the SWMP where necessary based on comments from the City of Tracy and WSID.

6.2 SWMP PUBLIC ACCESS

This SWMP is a public document and is intended for use by TUSD faculty and staff. Requests for copies of the SWMP can be obtained either on the TUSD website http://www.tracy.k12.ca.us/ or by calling the district education center at (209) 830-3200.

6.3 SWMP ANNUAL REPORTS AND RECORD KEEPING

The TUSD must submit annual reports to the RWQCB, Central Valley Region 5S each year. The first submission will be one year following approval of the SWMP. The report will summarize the activities performed throughout the annual reporting period and shall include the following:

- The status of compliance with permit conditions;
- An assessment of the appropriateness and effectiveness of the identified BMPs;
- Status of the identified measurable goals;
- Results of information collected and analyzed, including monitoring data, if any, during the reporting period;

TRACY UNIFIED SCHOOL DISTRICT, TRACY, CALIFORNIA

- A summary of the storm water activities TUSD plans to undertake during the next reporting cycle;
- Any proposed changes to the SWMP along with justification of why the changes are necessary; and
- A change in the person or persons implementing and coordinating the SWMP.

The TUSD must keep records required by the General Permit for at least 5 years or the duration of the General Permit, if continued. The RWQCB may specify a longer time for record keeping retention. The TUSD must submit the records to the RWQCB upon request. The TUSD must make the records, including the permit and SWMP, available to the public during regular business hours.

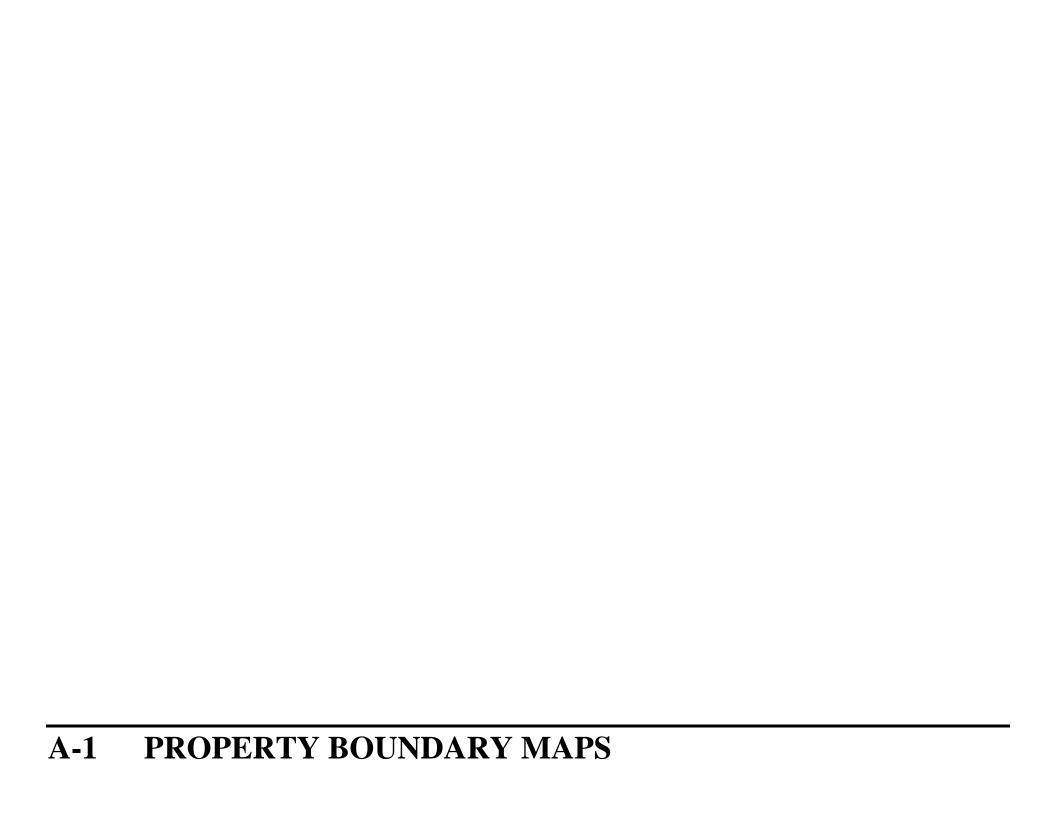
APPENDIX A NOTICE OF INTENT

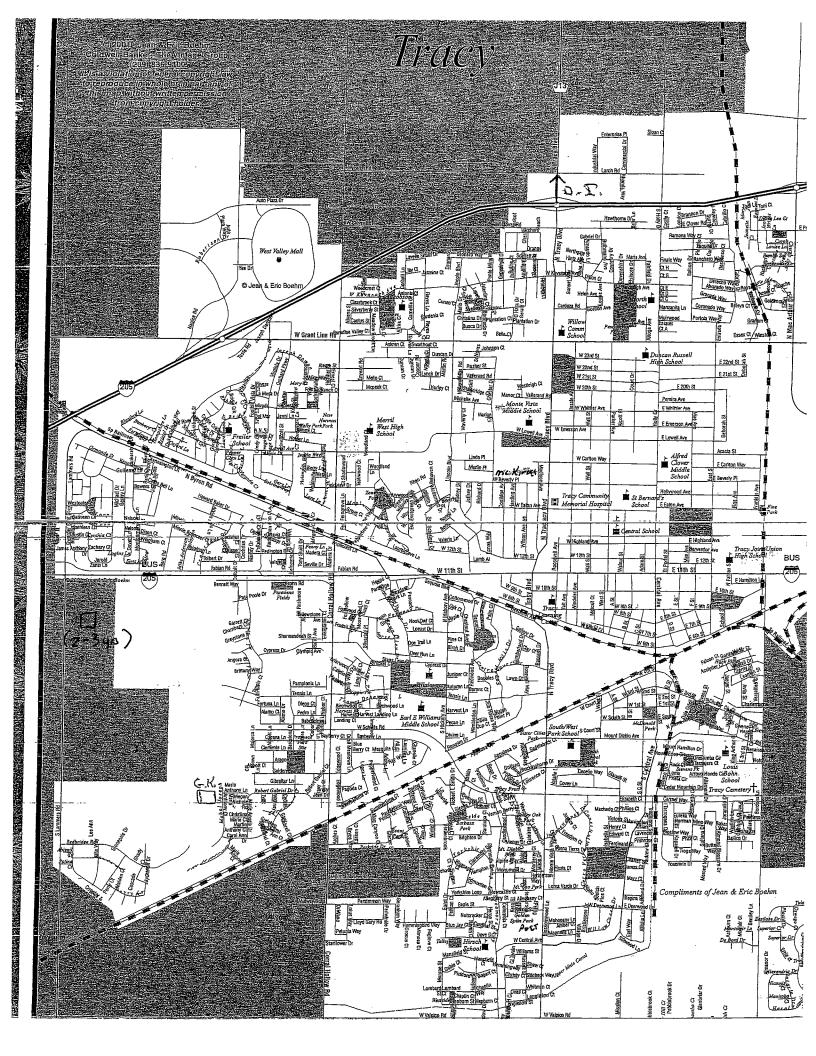
State Water Resources Control Board NOTICE OF INTENT TO COMPLY WITH THE TERMS OF THE GENERAL PERMIT FOR STORM WATER DISCHARGES FROM SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (WATER QUALITY ORDER NO. 2003 – 0005 - DWQ)

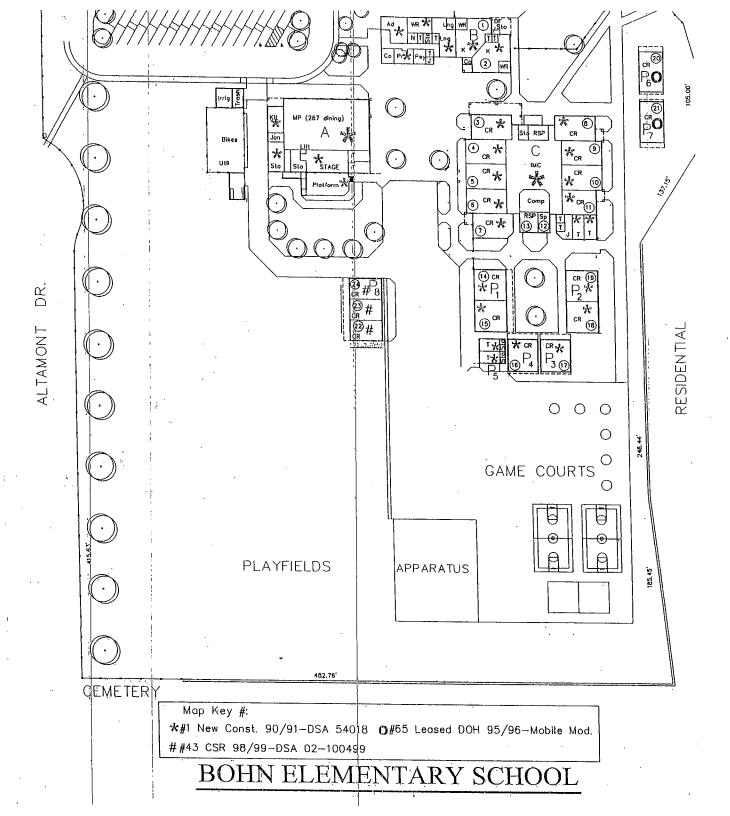
I. NOI Status

Agancy	Information					
A. Agency		istrict				
B. Contac	t Person Bob Corsaro				Director of Mai Coordinator	intenance, Building and Grounds/Safe
D. Mailing				E. Address (
F. City	Tracy		State	CA	G. Zip 95376	H. County San Joaquin County
I. Phone	(209) 830-3265	J. FAX (209) 830)-3269		K. Email Addre	saro@tusd.net
L. Operato	or Type (check one) 2. [] County 3. [] State	4. [] Federal	5. [X] 5	Special Distr	rict 6. [] Gov	vernment Combination
Permit	Area Tracy Unified School Di	istrict				
	aries of Coverage (include See attached site maps	a site map with the substand boundary		iptions.		
Billing A. Agency	Information Tracy Unified School Di	istrict				
	Tracy Unified School Di	istrict		C. Title Assist.	ant Superin	tendent for Rusiness Services
A. Agency	Tracy Unified School Di t Person Casey J. Goodall g Address					tendent for Business Services
A. Agency B. Contac	Tracy Unified School Di t Person Casey J. Goodall		State	Assista E. Address (H. County
A. Agency B. Contac D. Mailing F. City	Tracy Unified School Di t Person Casey J. Goodall g Address 1875 W. Lowell Avenue Tracy			Assista E. Address (Line 2)	H. County San Joaquin County
A. Agency B. Contac D. Mailing F. City I. Phone (Fees are b 23, Divisio L. Popu	Tracy Unified School Di t Person Casey J. Goodall g Address 1875 W. Lowell Avenue Tracy 209) 830-3200 ext. 1100	J. FAX (209) 83 by the Small MS4. To do e viewed at www.swrcb	80-325 etermine	Assista E. Address (CA 59	G. Zip 95376 K. Email Address	H. County San Joaquin County

VI. Discharger Information (check applicable box(es) and complete corresponding information) 1. [X] Applying for Individu al General Permit Coverage									
2. [] Applying for a parmit with any or more so parmittees									
	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 Codeof Federal Regulations, parts 122.32. Attach additional sheets if necessary. Each co-permittee must complete an NOI.								
	Lead Agency				Signature				
,	Agency				Signature				
	Agency	Agency				Signature			
	Agency	Agency				Signature			
	3. [] Separate Implementing Entity (SIE) A. Agency								
	B. Contact Person	. Contact Person				C. Title			
	D. Mailing Address			E. Address (Line 2)					
				Canan	L. Address	G. Zip		III County	
	F. City			State	CA			H. County	
I. Phone J. FAX K. Email Address									
	H. Operator Type (chect 1. [] City 2. []								
	Minimum Control Measures being implemented by the SIE (check all that apply) [] Public Education [] Public Involvement [] Illicit Discharge/Elimination [] Construction [] Post Construction [] Good Housekeeping								
	that this document and personnel properly gat directly responsible for aware that there are sig provisions of the perm	with the agency identified in Section III of this form and comply with its qualifying storm water program. I certify under penalty of law I all attachments were prepared under my direction and supervision in accordance with a system designed to assure that qualified her and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I am inficiant penalties for submitting false information, including the possibility of fine and imprisonment. Additionally, I certify that the t, including the development and implementation of a Storm Water Management Program, will be complied with."							
l	N. Signature of Official Date								
VII.	VII. Storm Water Management Plan (check box) [X] As per section A.2. of this General Permit, the SWMP is attached.								
VIII	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:	A. Printed Name: Bob Corsaro Director of Maintenance, Building and Grounds/Safety Coordinator C. Signature: D. Date:							
	B. Title:								
	C. Signature:								







Map Key #i

New Const. 1938-0SA 2305

New Const. 1947-DSA 4842

* New Const. 1947-DSA 7444

☑New Const. MR 1976-DSA 39630

@ Relo- Yr. Unk-DSA 41378

♦Relo- Yr. Unk.-DSA 45783

#24 MOD 89/90-DSA 47310

#44 CSR Relo 96/97-DSA 68425

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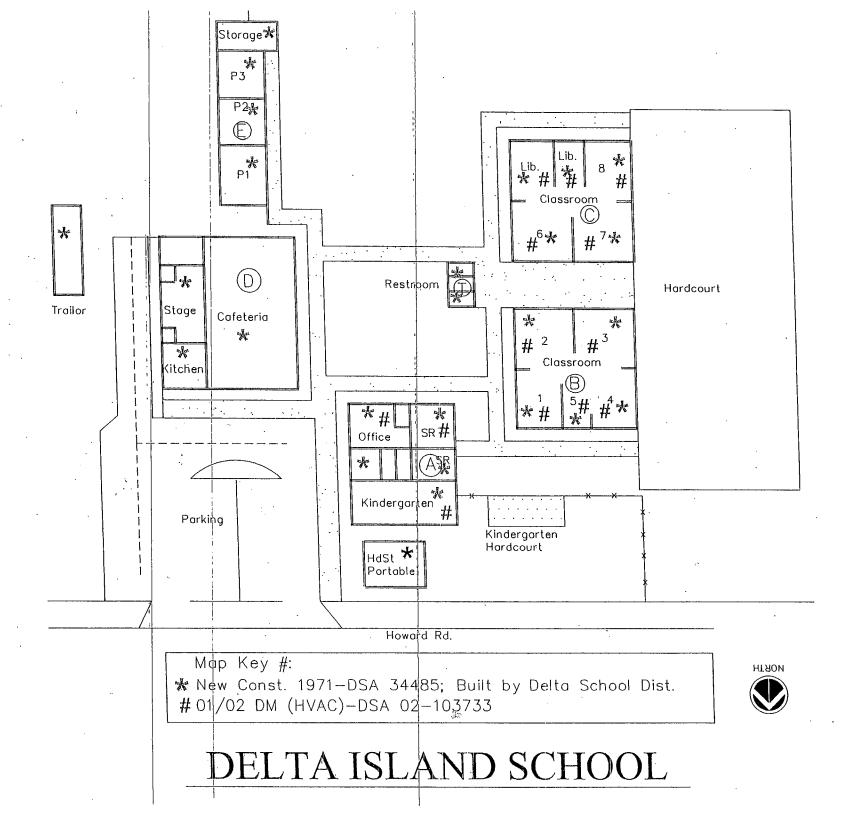


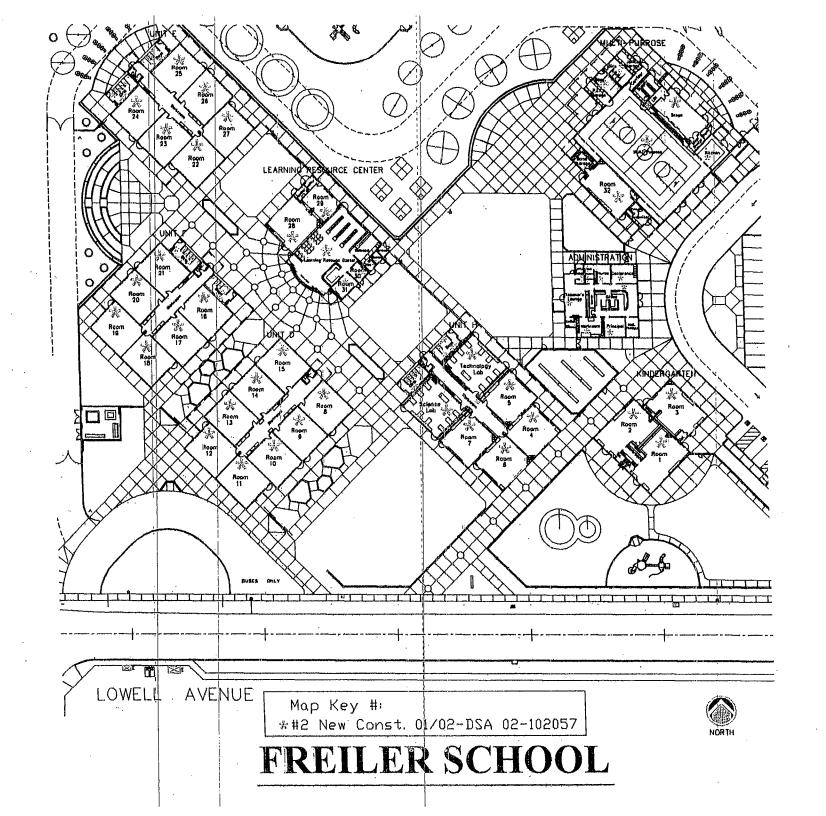
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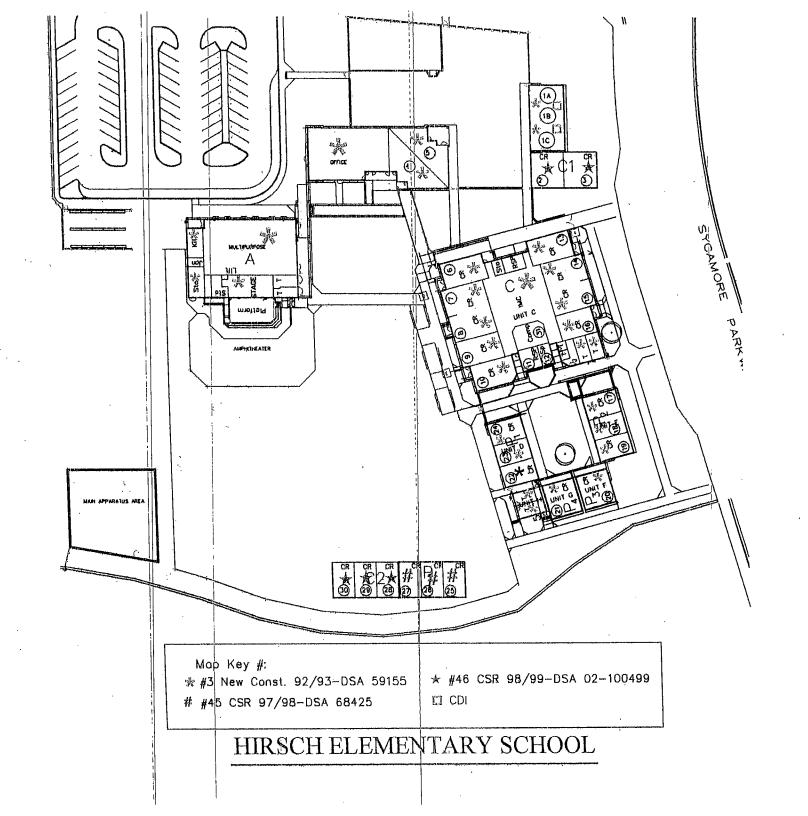
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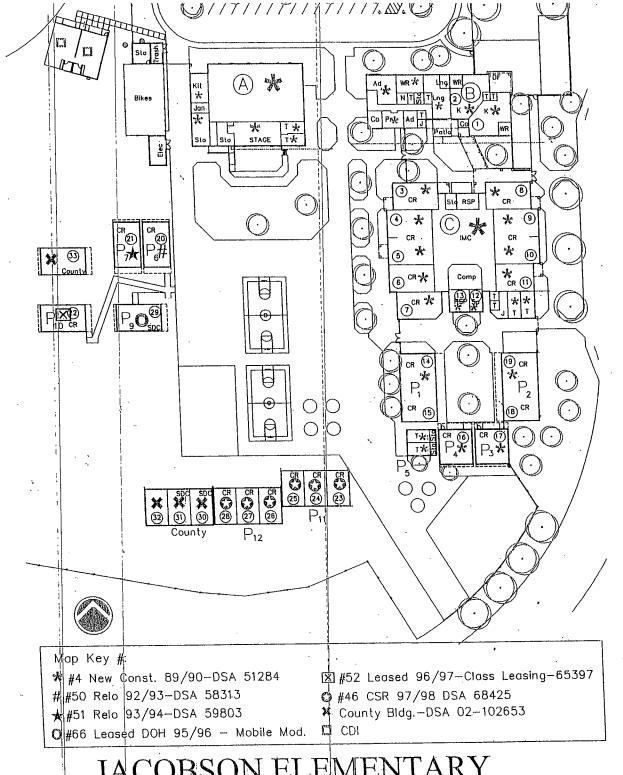
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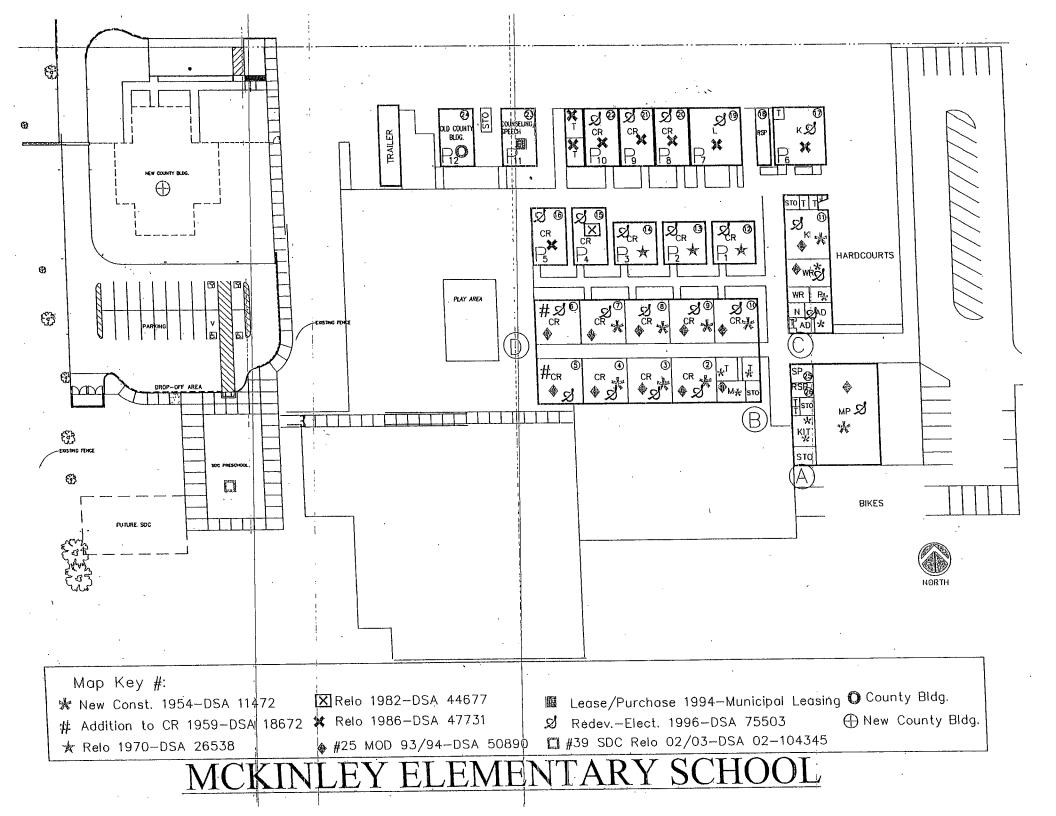
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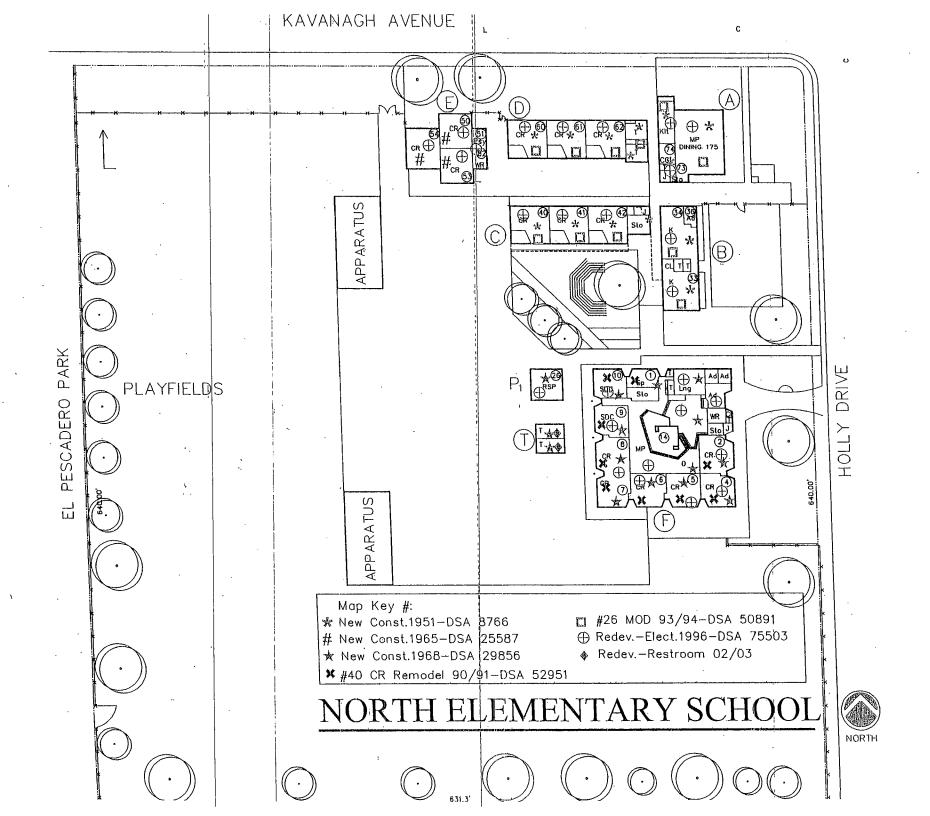


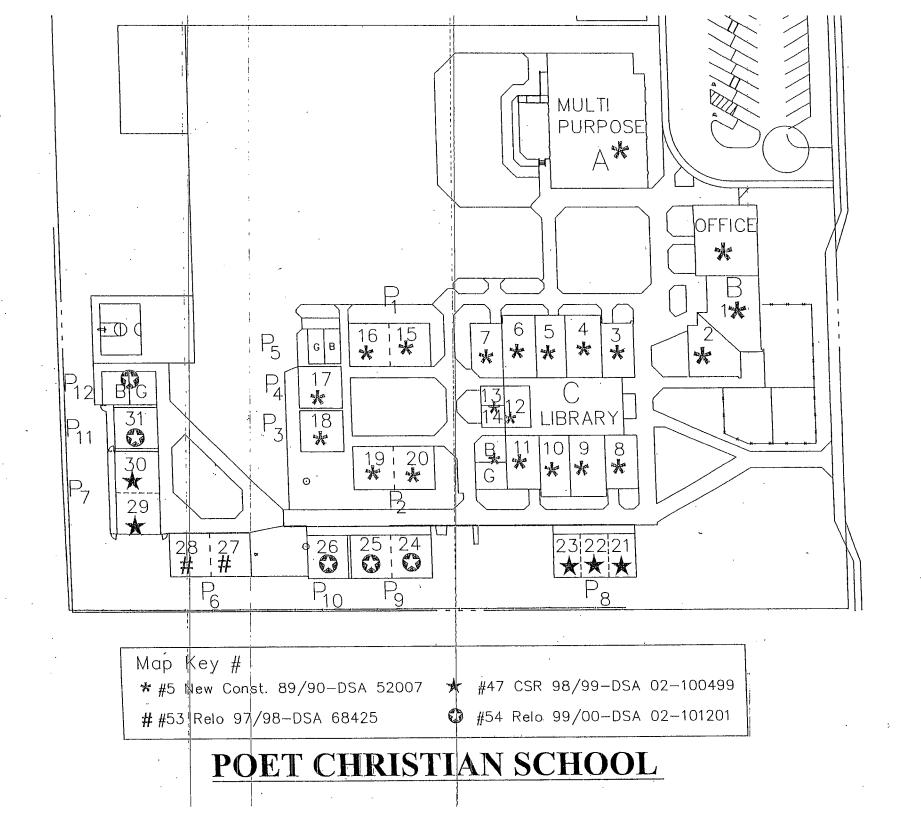


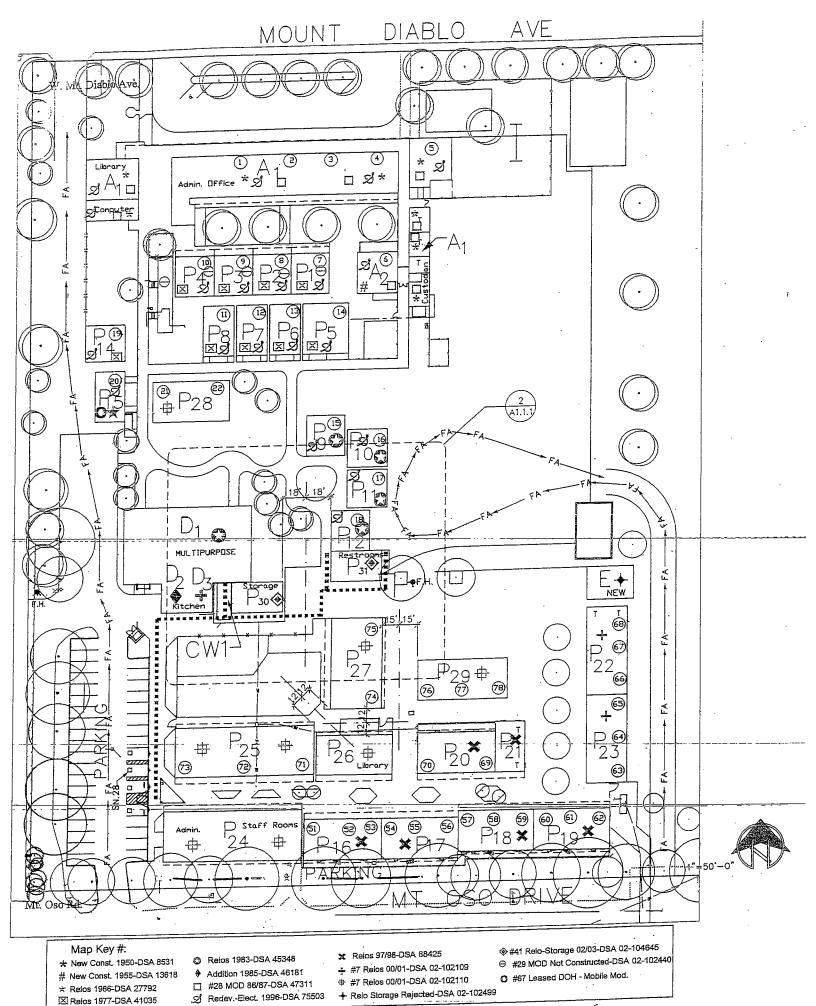




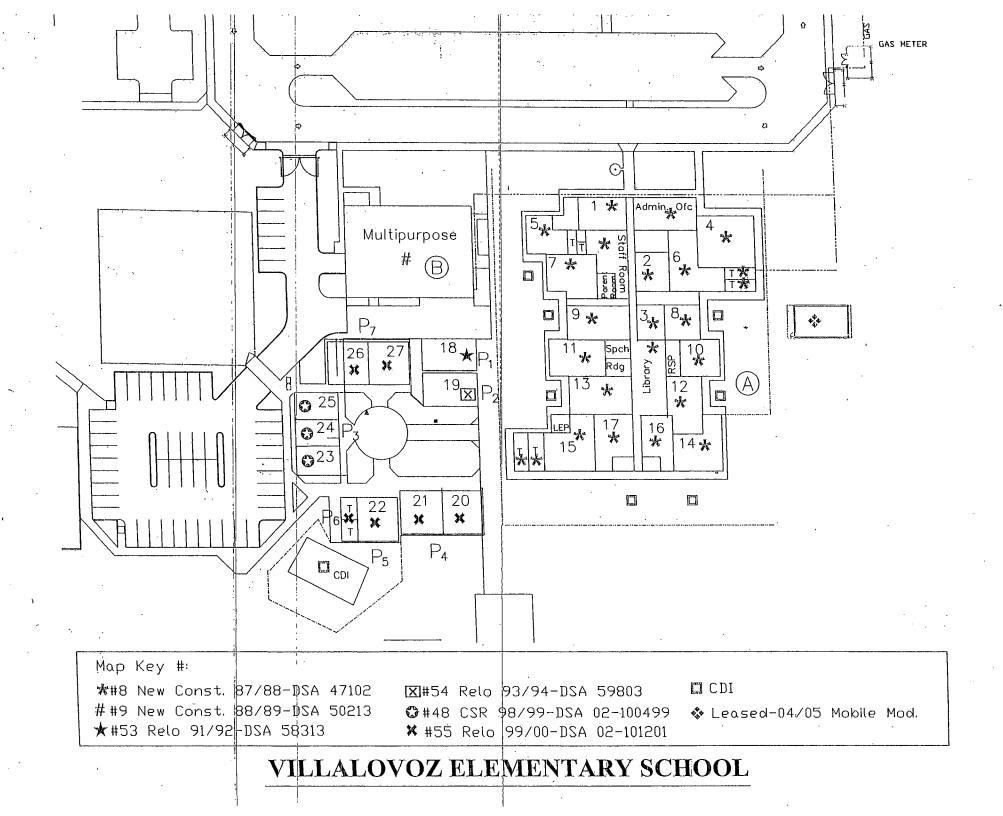






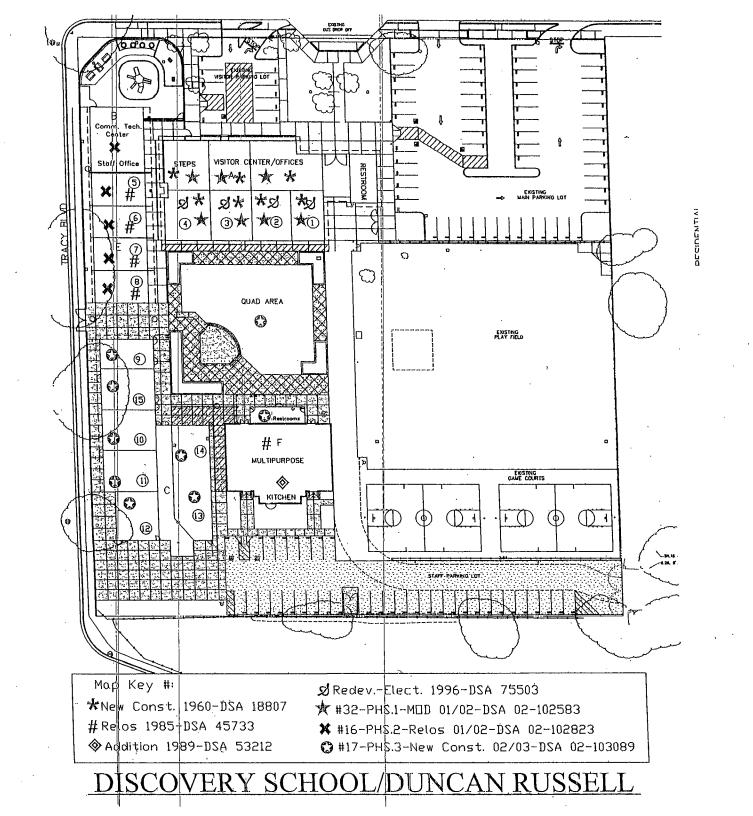


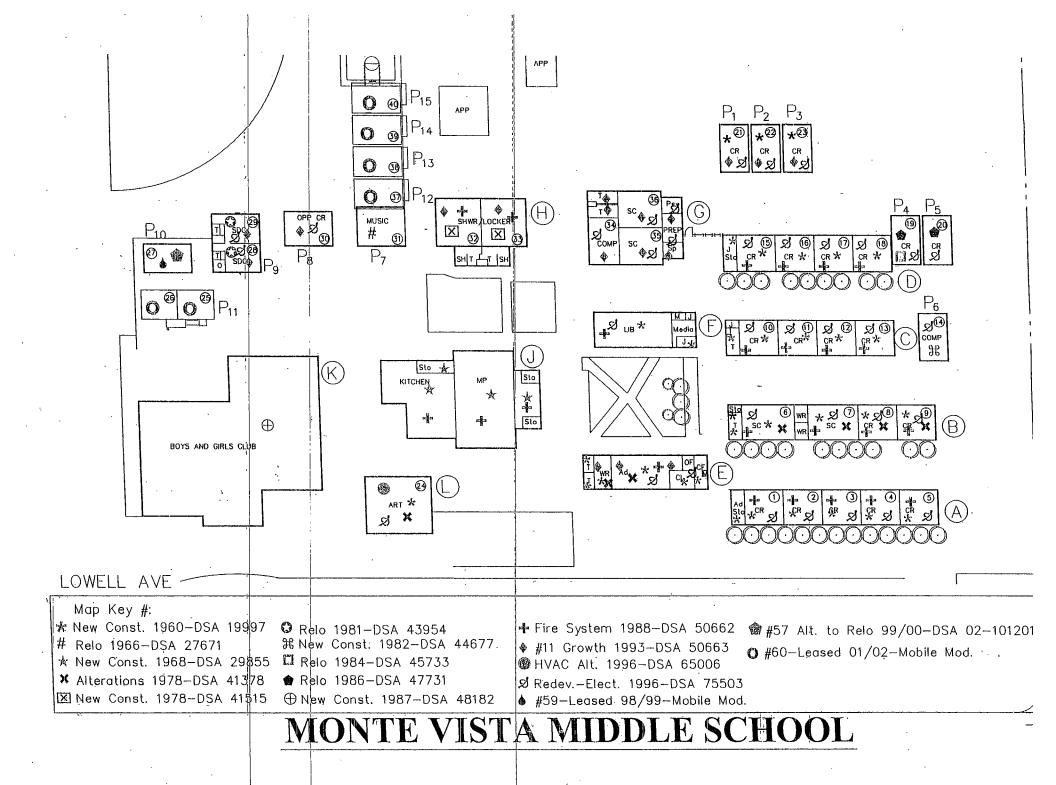
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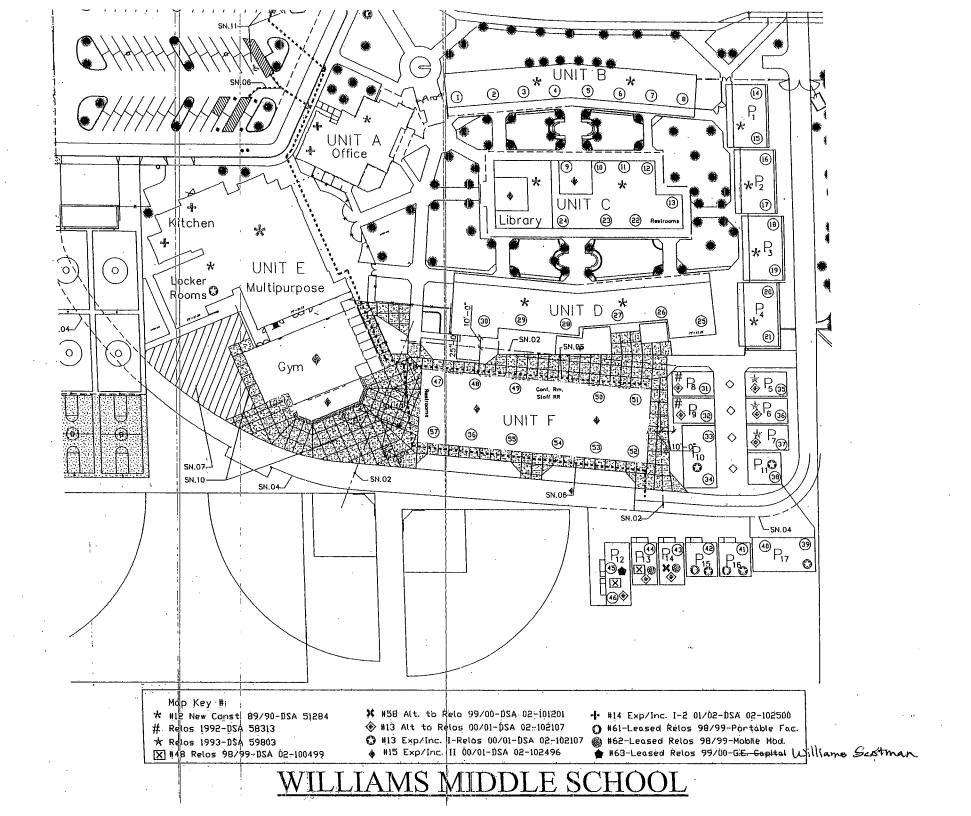


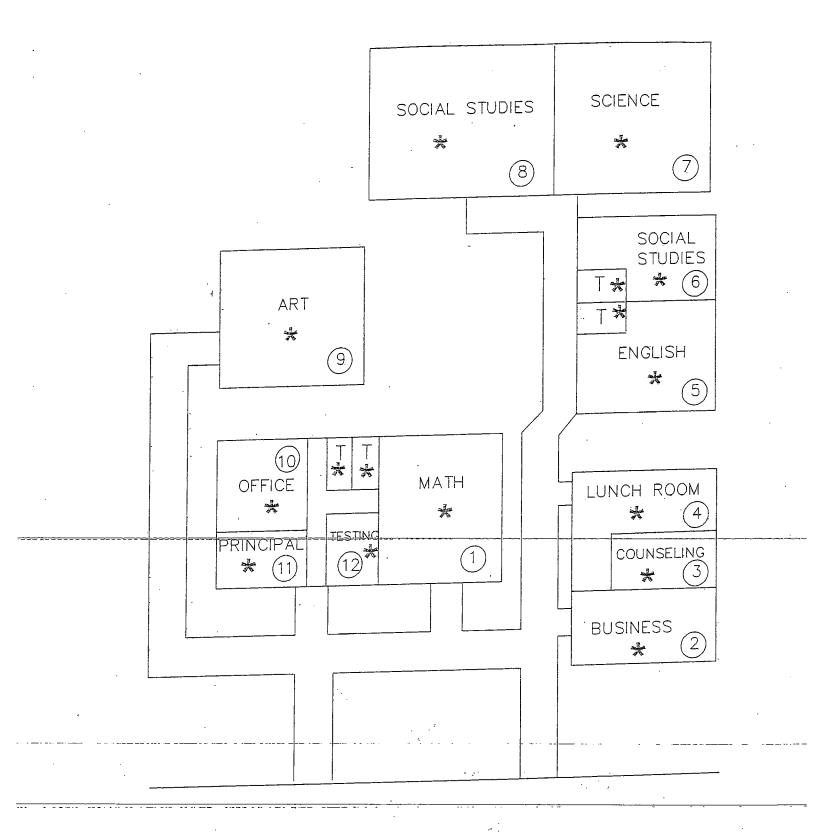
DRIVE

HOLLY





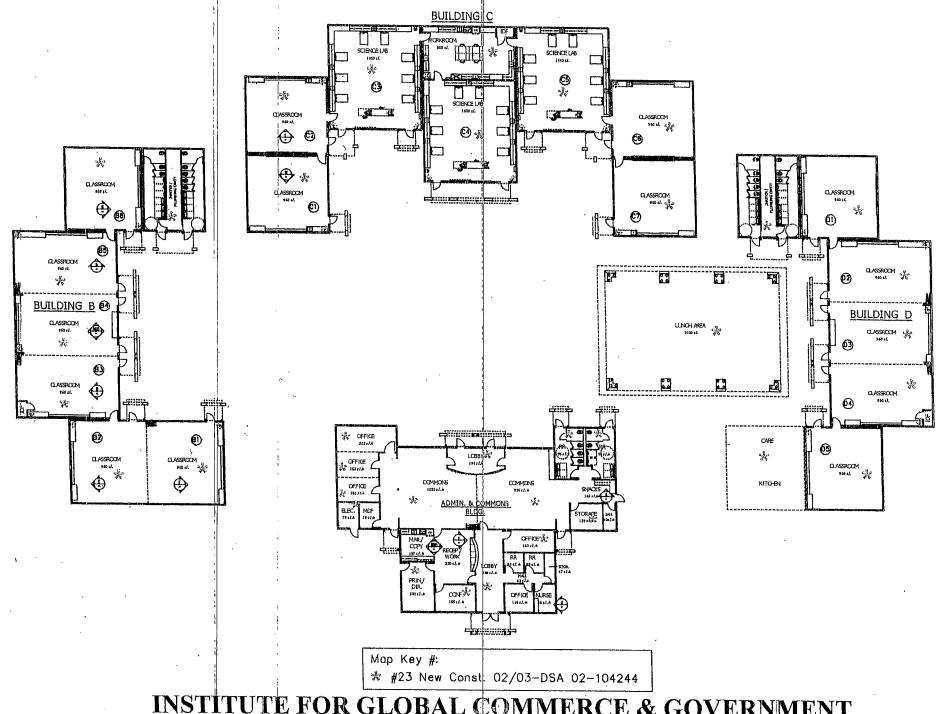




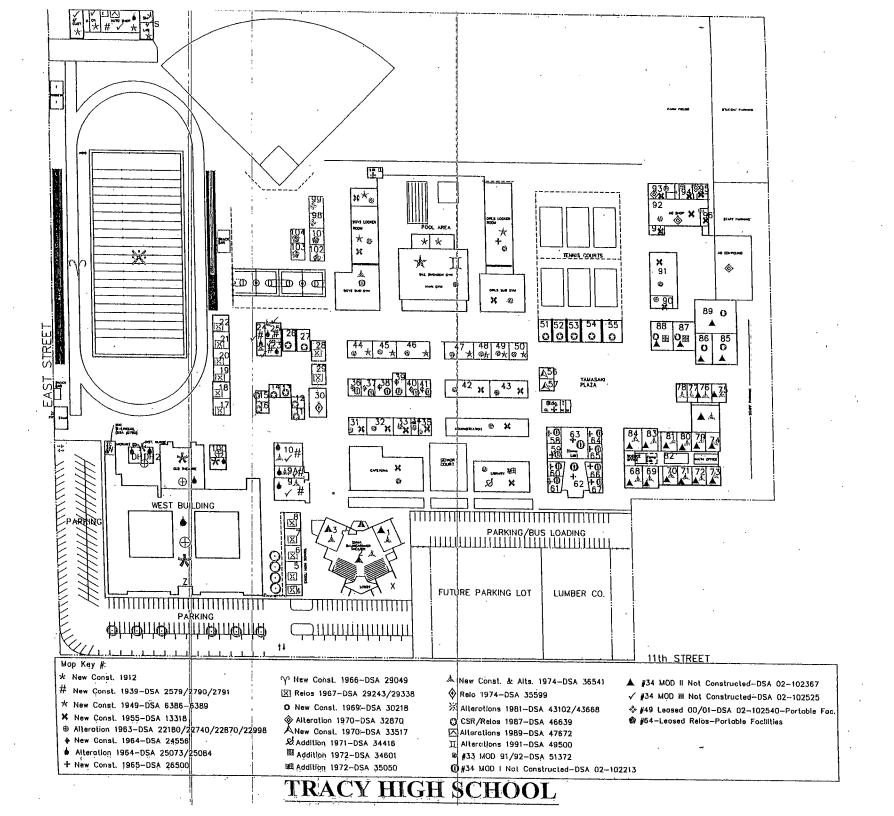
PARKING

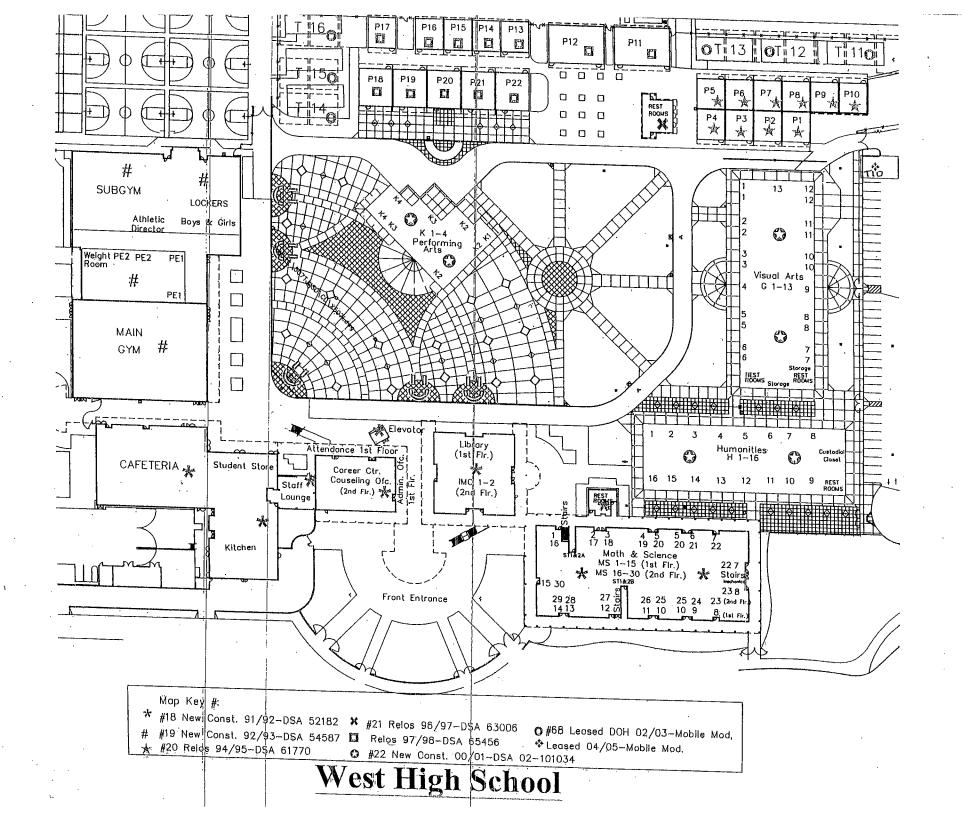
DUNCAN RUSSELL

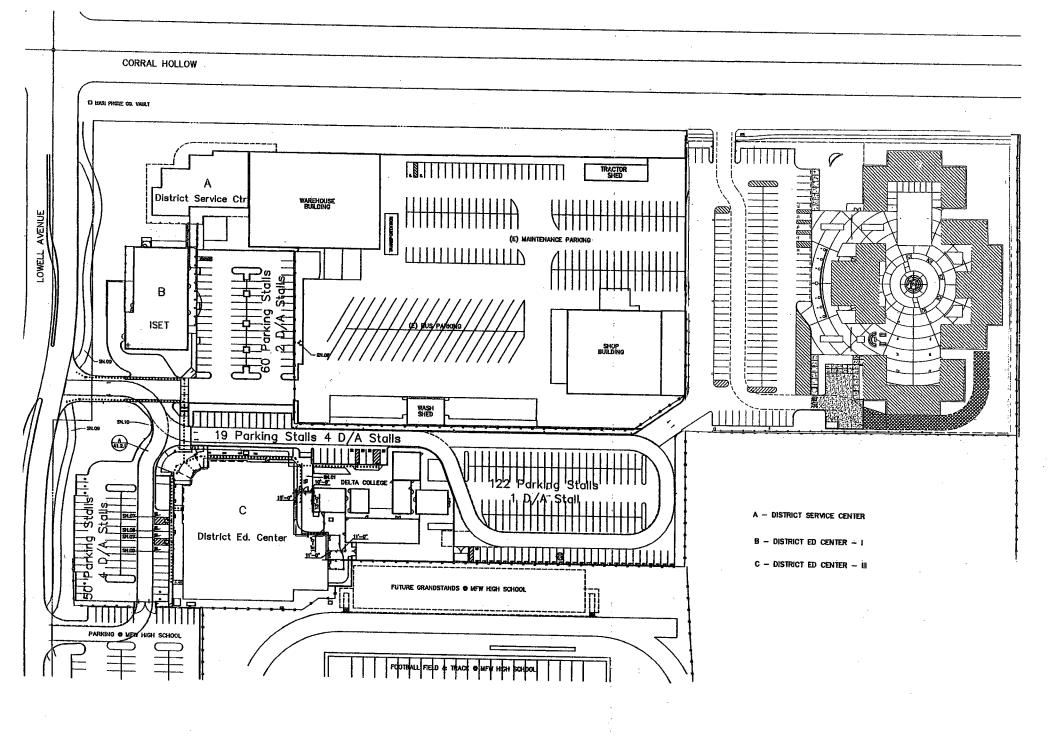
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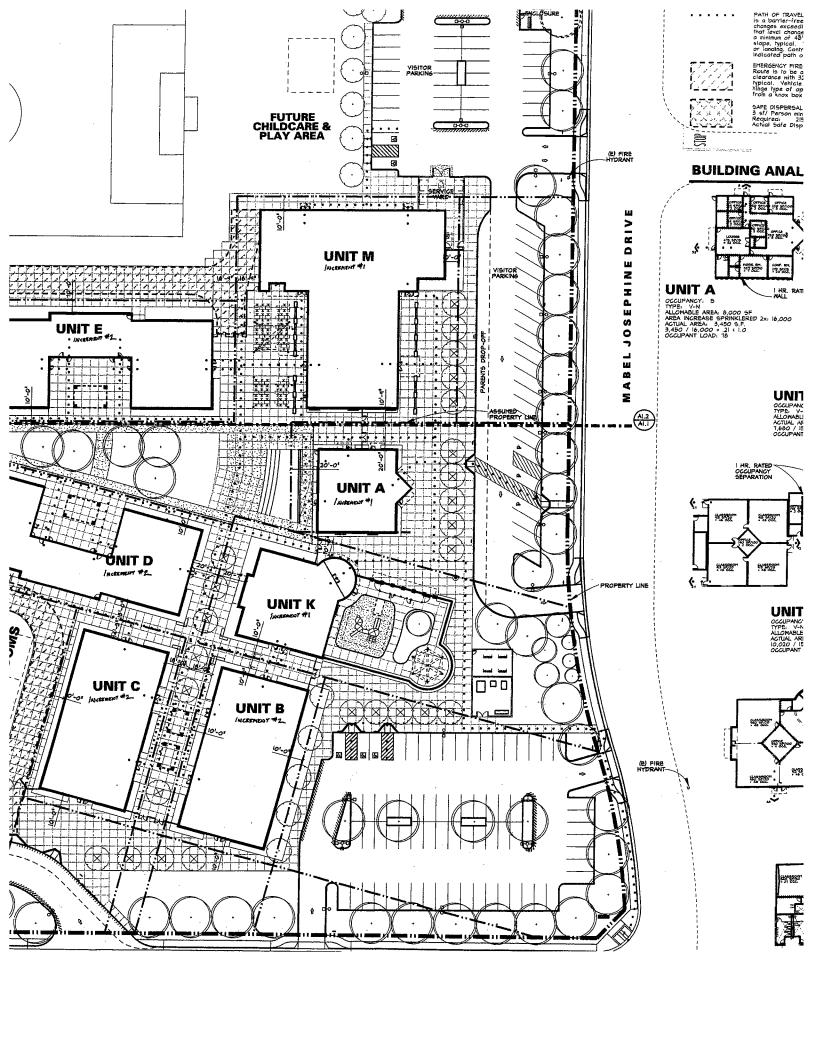


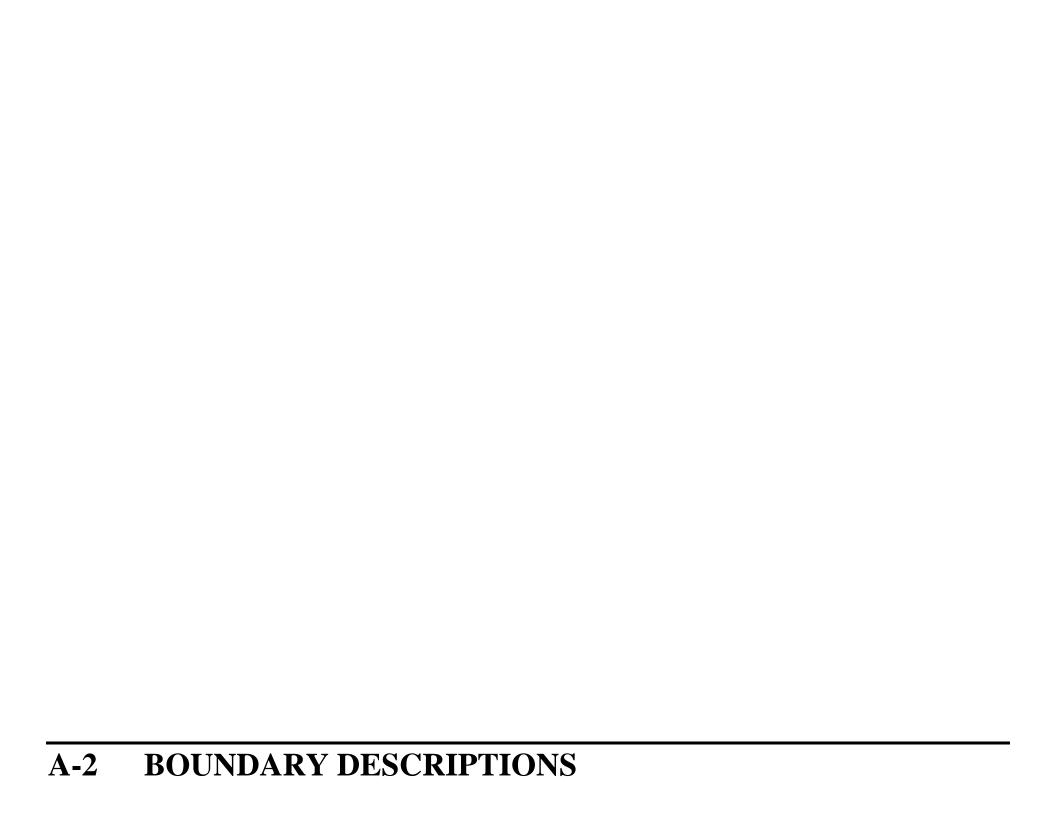
INSTITUTE FOR GLOBAL COMMERCE & GOVERNMENT











Tracy Unified School District Individual School Site Boundaries 2006-2007 School Year

Bohn K-5 Elementary: Beginning at NE corner of Valpico Rd & Tracy Bl... Tracy Bl N to W. Central Av. Behind W. Central Av E to Silkwood Ln. Behind Silkwood Ln E to RR tracks. RR tracks N to Schulte Rd. Schulte Rd W to Central Av. Central Av N to RR tracks just before 6th St. RR E tracks to MacArthur Av. MacArthur Av N to 11th St. 11th St E to Chrisman Rd. Chrisman Rd S to Valpico Rd. Valpico Rd W to Tracy Bl.

Central K-5 Elementary: Beginning at NE corner of 11th St & Tracy Blvd.... Tracy Bl N to Grant Line Rd. Grant Line Rd E to Chrisman Rd. Chrisman Rd S to 11th Street. 11th St W to Tracy Bl.

Delta Island K-8 Elementary: Beginning at NE corner of Old River & Alameda County Line... Alameda County Line N to N. Victoria Canal. N. Victoria Canal E to Middle River. Middle River SE to Inland. Inland N to Highway 4. Highway 4 E to San Joaquin River. San Joaquin River S to Old River. Old River W to Alameda County Line.

Hirsch K-5 YRE Elementary: Beginning at NE corner of Valpico Rd & Corral Hollow Rd... Corral Hollow Rd N to Schulte Rd. Schulte Rd E to Tracy Bl. Tracy Bl S to Valpico Rd. Valpico Rd W to Corral Hollow Rd.

Freiler K-8 YRE Elementary: Beginning at NE corner of Byron Rd & Corral Hollow Rd... Corral Hollow Rd N to Grant Line Rd. Grant Line Rd W to Highway 205. Highway 205 SW to Byron Rd (RR tracks). Byron Rd (RR tracks) SE to Corral Hollow Rd.

Jacobson K-5 YRE Elementary: Beginning at NE corner of Lammers Rd & Byron Rd...

Lammers Rd S to 11th Street. 11th Street E to Corral Hollow Rd. Corral Hollow Rd N to Byron Rd. Byron Rd W to San Jose Rd. San Jose Rd N to Middle Rd. Middle Rd W to Reeve Rd.

Reeve Rd S to Byron Rd. Byron Rd NW to Hansen Rd. Hansen Rd N to Old River. Old River E to Lammers Rd. Lammers Rd S to Bethany Rd. Bethany Rd E to Tracy Bl. Tracy Bl S to Grant

Line Rd. Grant Line Rd W to Hwy 205. Hwy 205 SW to Byron Rd.

Kelly K-8 Elementary: South of 11th Street, West of Corral Hollow, North of Valpico & East of Lammers Rd.

McKinley K-5 YRE Elementary: Beginning at NE corner of 11th St & Corral Hollow Rd. ... Corral Hollow Rd N to Grant Line Rd. Grant Line Rd E to Tracy Bl. Tracy Bl S to 11th St. 11th St W to Corral Hollow Rd.

North K-8 Elementary: For K-5: Beginning at NE corner of Tracy Bl & Grant Line Rd....

Tracy Bl N to Bethany Rd. Bethany Rd E to Sugar Cut. Sugar Cut N along Old River. Old River E to Chrisman Rd. Chrisman Rd S to Grant Line Rd. Grant Line Rd W to Tracy Bl. For 6-8:

Beginning at NE corner of Tracy Bl & Grant Line Rd.... Tracy Bl N to Bethany Rd. Bethany Rd E to Sugar Cut. Sugar Cut N along Old River. Old River E to Chrisman Rd. Chrisman Rd S to 11th Street. 11th St W to Holly Dr. Holly Drive N to Lowell Av. Lowell Av W to Tracy Bl. Tracy Bl to Grant Line Rd. (Both sides of Lowell Av between Holly Dr & Tracy Bl are in North's 6-8 zone.)

Poet-Christian K-8 Magnet School: Beginning at NE corner of W. Central Av & Tracy Bl...Tracy Bl N to Schulte Rd. Schulte Rd E to RR tracks. RR tracks S to Silkwood Ln. Behind Silkwood Ln W to W. Central Av. Behind W.Central Av W to Tracy Bl.

South/West Park K-5 Magnet School: Beginning at NE corner of Schulte Rd & Tracy Bl... Tracy Bl N to RR tracks. RR tracks NW to 11th St. 11th St E to MacArthur Rd. MacArthur Rd S to RR tracks. RR tracks SW along 6th St to Central Av. Central Av S to Schulte Rd. Schulte Rd W to Tracy Bl.

Villalovoz K-5 YRE Elementary: Beginning at NE corner of Schulte Rd & Corral Hollow Rd... Corral Hollow Rd N to 11th St. 11th St E to RR tracks. RR tracks SE to Tracy Bl. Tracy Bl S to Schulte Rd. Schulte Rd W to Corral Hollow Rd.

Monte Vista 6-8 Middle School: Beginning at NE corner of 11th St & Lammers Rd...

Lammers Rd N to Byron Rd. Byron Rd NW to San Jose Rd. San Jose Rd N to Middle Rd.

Middle Rd W to Reeve Rd. Reeve Rd S to Byron Rd. Byron Rd NW to Hansen Rd. Hansen Rd N to Old River. Old River E to Lammers Rd. Lammers Rd S to Bethany Rd. Bethany Rd E to Tracy Bl. Tracy Bl S to 11th St. 11th St E to MacArthur Rd. MacArthur Rd S to RR tracks. RR tracks W along 6th St to 11th St. 11th St W to Lammers Rd.

Williams 6-8 Middle School: Beginning at NE corner of Valpico Rd & Corral Hollow Rd... Corral Hollow Rd N to 11th St. 11th St E to RR tracks. RR tracks E along Sixth St to MacArthur Rd. MacArthur Rd E to Chrisman Rd. Chrisman Rd S to Valpico Rd. Valpico Rd W to Corral Hollow Rd.

Tracy High School (9-12): Beginning at NE corner of Tracy Bl & Valpico Rd... Tracy Bl N to Mt. Diablo Av. Mt. Diablo Av E to West St. West St N across RR Tracks to Sixth St. Sixth St W to Tracy Bl. Tracy Bl N to Eaton Av. Eaton Av E to Parker Av. Parker Av N to Grant Line Rd. Grant Line Rd W to Buthmann Av. Buthmann Av N to Clover Rd. Clover Rd W to Tracy Bl. Tracy Bl N Bethany Rd. Bethany Rd E to Sugar Cut. Sugar Cut N to Old River. Old River E to Chrisman Rd. Chrisman Rd S to Valpico Rd. Valpico Rd W to Tracy Bl. All addresses on the S side of Valpico Rd belong to Jefferson K-8 School District. Jefferson K-8 School District, New Jerusalem K-8 School District & Banta K-8 School District all "feed" into Tracy High School.

West High School (9-12): Beginning at NE corner of Valpico Rd & Lammers Rd... Lammers Rd N to Byron Rd. Byron Rd NW to San Jose Rd. San Jose Rd N to Middle Rd. Middle Rd W to Reeve Rd. Reeve Rd S to Byron Rd. Byron Rd NW to Hansen Rd. Hansen Rd N to Old River. Old River E to Lammers Rd. Lammers Rd S to Bethany Rd. Bethany Rd E to Tracy Bl. Tracy Bl S to Clover Rd. Clover Rd E to Buthmann Av. Buthmann Av S to Grant Line Rd. Grant Line Rd E to Parker Av. Parker Av. S to Eaton Av. Eaton Av W to Tracy Bl. Tracy Bl S to Sixth St. Sixth St E to West St. West St S across RR Tracks to Mt. Diablo Av. Mt. Diablo Av W to Tracy Bl. Tracy Bl S to Valpico Av. Valpico Av W to Lammers Rd. Addresses within Delta Island K-8 boundaries, Lammersville K-8 School District, Holt Union K-8 School District, & Mountain

House K-8 School District all "feed" into West High School.