

Jurisdictional Urban Runoff Management Plan

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7.0 INDUSTRIAL AND COMMERCIAL COMPONENT

7.1 Introduction

The overall goal of the Industrial and Commercial component is to establish a programmatic framework for the implementation of activities to minimize the impact of discharges from industrial and commercial businesses on receiving waters. This section provides a description of this framework. Two departments share responsibility for the oversight of business facilities and activities in the unincorporated County. The Department of Agriculture, Weights, and Measures (AWM) educates operators, inspects facilities, and oversees BMP implementation at agricultural businesses such as nurseries, greenhouses, pest control operations, golf courses, and cemeteries. The Department of Public Works (DPW) provides similar oversight for other commercial and industrial businesses in the County's inventory.

7.2 Stationary Sources Element

7.2.1 Background

The main objective of the industrial and commercial component of the JURMP is to minimize or eliminate the impacts of industrial and commercial activities on receiving waters and other sensitive environmental resources.

The County's industrial and commercial inventories include commercial businesses and industrial facilities. Examples of industrial facilities include manufacturing facilities and trucking businesses. Stationary commercial facilities include auto repair shops, restaurants, equine facilities, and wholesalers of many kinds but do not include mobile commercial facilities.

Each facility has the potential to discharge pollutants into the MS4 and hence impact local water quality. In this program, pollution prevention methods are used as an initial mechanism for reducing commercial discharges of pollutants into regional MS4s. Often, the most cost effective and simple solution to reducing pollution is to implement pollution prevention techniques at the source. The County also requires minimum site and activity specific BMPs to be implemented, and inspections and enforcement procedures are conducted to verify compliance and, in some cases, to provide more site-specific direction for BMP implementation.

7.2.2 Source Characterization

A watershed-based inventory of the industrial and commercial sites/sources within the County's jurisdiction has been compiled from previous inspections, Environmental Health databases and various directories. The following sections describe the County's source prioritization processes.

7.2.2.1 Source Prioritization Process

The County's prioritization goals are (1) to identify those sites that truly present a high threat to water quality, (2) to provide a mechanism by which new or un-inspected facilities can be incorporated appropriately into the business inspection inventory, and (3) to inspect each facility

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at least once annually if inspection data suggests non-compliance or the facility has not been inspected previously.

7.2.2.1.1 DPW Prioritization Process

To prioritize the inventory, DPW staff utilizes the factors outlined in Permit Section b(3)(b), items i - xiv, in determining if a particular facility poses a high threat to water quality.

Previously inspected facilities (“known” sites)

The following criteria are considered first by the inspector:

- Facility compliance history (for BMP deficiencies);
- Proximity to, and sensitivity of, receiving water bodies;
- Proximity to environmentally sensitive areas; and
- Clean Water Act (CWA) 303(d) water body and impairing pollutants generated by the facility.

Next, these criteria are compared to the facility’s potential to discharge, i.e., site design and construction, pollutant-generating activities, and material and waste handling.

Finally, the degree of management oversight, as determined by the inspector’s observation of the shop operations and review of stormwater-related documents, is also considered in the site’s classification as a High, Medium, or Low threat to water quality.

Un-inspected or new facilities

The facilities will be initially classified as Medium Priority if they meet one of these criteria: proximity to receiving water bodies; proximity to environmentally sensitive areas; sensitivity of the receiving water bodies; and CWA 303(d) water body and impairing pollutants potentially generated by the facility. These sites will be included first in the following year’s make-up portion. If the facilities do not meet any of the criteria, they will be classified initially as Low Priority.

The file of each inspected site, regardless of priority classification, is reviewed annually for possible change in prioritization.

The current system used by the County depends on the inspector’s fluency in using prioritization tools (e.g., GIS applications and various resource databases), knowledge of pollutant-generating activities and associated BMPs, and best professional judgment. The County continually provides refresher training and discussion in staff meetings to maintain consistency in prioritization.

Equine facilities

Commercial equestrian facilities vary greatly in facility design, ground slope, vegetation, soil permeability, number of horses, usable area, and other factors. Consequently, prioritization is an on-going challenge. Criteria for classifying an equine facility as High Priority are as follows:

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1. The facility area drains to a receiving water;
2. The facility is adjacent to or discharging directly into an environmentally sensitive area;
3. The facility is tributary to a CWA section 303(d) water body segment impaired by nutrients or bacteria; or
4. The facility has a history of non-compliance with stormwater regulations.

7.2.2.1.2 AWM Prioritization Process

Agricultural businesses including Nurseries/Greenhouses, Golf Courses, Cemeteries, Pest Control Businesses, and regulated Animal Facilities are evaluated for their threat to water quality and classified as High, Medium, or Low using the following criteria.

High Threat (inspected annually):

Sites with any of the following characteristics:

1. Property is:
 - a. Tributary to a CWA section 303(d) impaired water body segment (that generates pollutants for which the water body segment is impaired).
 - b. Within or directly adjacent to or discharging directly to coastal lagoons or other receiving waters within an environmentally sensitive area and operations pose significant potential of discharging pollutants.
 - c. Within 200 feet of any water body and operations pose significant potential of discharging pollutants to that receiving water.
2. Facility having ongoing history of non-compliance (excluding administrative type deficiencies such as training and annual review) in previous inspections and most recent inspection.
3. Site having any combination of factors that create a significant potential to discharge pollutants with or without meeting the characteristics above. These factors include but are not limited to: materials used; materials storage and management; wastes generated and management; irrigation methods and management; vehicle use and storage; facility design; size; potential to discharge to MS4; and non-storm water discharges.

Medium Threat (Inspection frequency determined individually):

Sites with the following characteristics:

1. Not determined to be High Threat and
2. Having a history of non-compliance (excluding administrative type deficiencies such as training and annual review) in previous inspections but was in compliance at the most recent inspection.

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Low Threat (Inspection frequency determined individually):

Sites with the following characteristics:

1. Not determined to be High or Medium Threat and
2. In compliance at most recent inspection and no significant history of non-compliances.

In establishing these classification criteria, all of the applicable parameters listed in RWQCB San Diego Region Order No. R9-2007-0001 section D.3.b.(3)(b) were addressed.

7.2.2.2 Updated Source Inventories

See Attachment 7.1.1, 7.1.2 and 7.1.3 for updated DPW and AWM inventories. The following Table 7.1 provides a summary of the facilities located in the DPW and AWM aforementioned attachments.

7.2.3 Best Management Practice Requirements

7.2.3.1 Updated BMP Requirements

Updates to the Watershed Protection Ordinance (WPO), effective April 12, 2008, reflect the new requirements of the Permit re-issuance. Stationary industrial and commercial sites / sources must meet the applicable requirements set out in WPO sections 67.801 through 67.806, sections 67.808 through 67.810, and section 67.813. These include operating practices and structural controls to reduce or eliminate the discharge of pollutants in runoff. The use of pollution prevention (P2) practices is always encouraged, and required where applicable and feasible. BMP requirements and options for each type of PGA are provided in Attachment 7.2. The specific application of BMPs is determined on a site-by-site basis to address the specific PGAs applicable to each facility identified in Attachment 7.2. BMP requirements for stationary industrial and commercial sites / sources are reviewed annually and updated as necessary and minimum BMP requirements are provided in Attachment 7.3.

7.2.3.2 Additional Controls for Stationary Commercial Sites / Sources

Permit section D.3.a.(2)(e) requires that additional controls be implemented or required for stationary industrial and commercial sites / sources tributary to CWA section 303(d) impaired water body segments where an area or activity generates pollutants for which the water body segment is impaired, or that are within, adjacent to, or discharging directly to coastal lagoons or other receiving waters within environmentally sensitive areas. The stationary industrial and commercial sites / sources inventory provided in Attachment 7.3 indicates which sites / sources have been determined to meet either of these criteria.

In addition to meeting all other requirements of this section, the following are required for these sites / sources, as applicable:

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- Include in the annual employee training and documentation, awareness of the environmentally sensitive area and the additional importance of minimizing discharges from the facility;
- Include in the annual employee training and documentation, awareness of the CWA 303(d) impaired water body and the associated pollutant(s) of concern generated by the facility;
- Prepare and maintain a site-specific spill response plan that describes the areas where spills are likely to occur, the location of on-site storm drains and discharge points, the type and location of spill-response materials to be used, and the person(s) responsible for spill containment and cleanup; and
- Implement structural controls as directed by the authorized enforcement official. Such controls may include signage on private storm drains, drainage inserts in private storm drains, berm construction, and overhead coverage (in accordance with zoning and building codes).

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Table 7.1 - Overview of Commercial and Industrial Stationary Sources by Watershed and Priority (FY 2007-2008)

Business Type	Est. No. (3/08)	TTWQ Priority			Watershed									
		High	Med	Low	Santa Margarita (902)	San Luis Rey (903)	Carlsbad (904)	San Dieguito (905)	Peñasquitos (906)	San Diego River (907)	Pueblo (908)	Sweetwater (909)	Otay (910)	Tijuana (911)
DPW														
Automobile Repair, Maintenance, Fueling, or Cleaning	242	26	53	163	28	13	23	24	0	109	0	44	1	0
Airplane and Boat Repair, Maintenance, Fueling, and Cleaning	8	1	7	0	0	0	0	2	0	4	0	2	0	0
Automobile and Other Vehicle Body Repair or Painting	51	7	41	3	3	0	4	10						
Equipment Repair, Maintenance, Fueling, and Cleaning	63	28	39	6										
Eating and Drinking Establishments	541	33	164	344	45	52	22	82	0	171	0	155	2	12
Paintball Fields & Other Recreational Sites	3	0	2	1										
Parking Lots and Storage	24	9	12	3	0	7	1	0	0	10	0	6	0	0
Retail and Wholesale Fueling	69	2	34	33	11	11	5	14	0	23	0	8	1	1
Other – Miscellaneous	143	27	72	44	4	9	19	9	0	94	0	7	0	1

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Business Type	Est. No. (3/08)	TTWQ Priority			Watershed									
		High	Med	Low	Santa Margarita (902)	San Luis Rey (903)	Carlsbad (904)	San Diego (905)	Peñasquitos (906)	San Diego River (907)	Pueblo (908)	Sweetwater (909)	Otay (910)	Tijuana (911)
Animal Facilities (e.g., kennels)	43	6	35	2	0	4	1	2	0	27	0	9	0	0
Equine Facilities	81	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Building Material Retailers and Storage	20	3	17	0	2	4	1	3	0	8	0	0	0	2
Industrial Facilities	163	104	23	36	17	8	10	22	0	65	0	38	1	1
AWM														
Pest Control Services (headquarters)	28	ND	ND	ND	2	11	5	1	0	4	0	5	0	0
Nurseries and Greenhouses	454	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Golf Courses	25	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cemeteries	7	ND	ND	ND	1	1	0	1	0	1	0	3	0	0

ND = Not Determined

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7.2.4 Program Implementation

As required by the Permit, a minimum of 25% of the entire inventory and 100% of the High Priority facilities will be inspected annually beginning the second year of permit implementation. Because the High Priority sites make up a fraction of the 25% minimum annual requirement, the remaining make-up portion shall consist of Medium and Low priority sites. Table 7.2 summarizes implementation roles and responsibilities for the commercial and industrial element.

Table 7.2 - Program Implementation Roles and Responsibilities for Stationary Sites and Sources

Program Activity	Responsible Staff	Minimum Frequency
A. Program Planning and Administration		
Review of source inventories	<ul style="list-style-type: none"> DPW Supervisor and Staff APW Supervisor and Staff 	Annual
Review of BMP requirements	<ul style="list-style-type: none"> DPW Supervisor and Staff APW Supervisor and Staff 	Annual
Review of implementation strategies and tools	<ul style="list-style-type: none"> DPW Supervisor and Staff APW Supervisor and Staff 	Annual
B. Facilitation Activities		
Staff training	<ul style="list-style-type: none"> WPP Staff AWM Staff 	Annual
Printed Materials	<ul style="list-style-type: none"> WPP Staff AWM Staff 	As needed
Newsletters / Direct Mailings	<ul style="list-style-type: none"> DPW Supervisor and Staff 	As needed
Presentations, Workshops, and Training	<ul style="list-style-type: none"> WPP Staff AWM Staff 	As needed
Website and Hotlines	<ul style="list-style-type: none"> WPP Staff AWM Staff 	As needed
Coordination with Industry Associations	<ul style="list-style-type: none"> DPW Supervisor and Staff AWM Supervisor and Staff 	As needed
C. Feedback & Verification		
Site Inspections	<ul style="list-style-type: none"> DPW Supervisor and Staff AWM Supervisor and Staff 	Annual (High Priority) As Needed (Other)
Complaint Investigations	<ul style="list-style-type: none"> DPW Supervisor and Staff AWM Supervisor and Staff 	As Needed
Special Investigations	<ul style="list-style-type: none"> DPW Supervisor and Staff AWM Supervisor and Staff 	As Needed

7.3 Mobile Sources Element

7.3.1 Background

Mobile businesses have been part of the County's inventory since the inception of the 2002 JURMP. These contractors have been inspected on an as needed basis. When mobile business are observed performing activities within the unincorporated areas of the County, inspectors make it a priority to stop and inspect their operations.

As part of an integrated program, the Copermittees have established a regional mobile business database by merging their mobile business inventories. The database tracks individual mobile businesses by location of headquarters and by the jurisdiction(s) where work commonly is done. In the County, new businesses are added primarily as a result of complaint investigations. (The County does not issue business licenses.) The County will continue to work with the Copermittees in refining this database.

7.3.2 Source Characterization

The following categories of mobile business are being identified by means of updated databases and directories as well as by field identification:

1. Mobile Automobile Repair and Maintenance
2. Mobile Equipment Repair and Maintenance
3. Mobile Vehicle Washing
4. Pest Control Services
 - a. Structural
 - b. Agricultural
5. Mobile Carpet, Drape or Furniture Cleaning
6. Cement Mixing, Masonry or Painting
 - a. Painting and Coating
 - b. Cement Mixing or Cutting
 - c. Masonry
7. Landscaping
8. Pool and Fountain Cleaning
9. Portable Sanitary Services
10. Power Washing Services

Table 7.3 provides estimated numbers of businesses in each category. All mobile businesses are considered to present a potential threat to water quality due to variable job locations.

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Table 7.3 - Summary of Mobile Business in the County's Inventory (FY 2007-2008)

Mobile Business Type	No. of Businesses
Dept. of Public Works (DPW)	
Auto Repair, Maintenance, Fueling, and Cleaning	Unknown
Equipment Repair, Maintenance, Fueling, and Cleaning	Unknown
Mobile Vehicle Washing	186
Mobile Carpet, Drape, or Furniture Cleaning	384
Painting and Coating Businesses	1,273
Cement Mixing and Cutting	44
Masonry Businesses	195
Pool and Fountain Cleaning	301
Portable Sanitary Toilet Servicing	5
Building and Pavement Washing	28
Dept. of Agriculture, Weights, and Measures (AWM)	
Pest Control	28
Landscaping Businesses	868

7.3.3 Best Management Practice Requirements

7.3.3.1 Updated BMP Requirements

Updates to the Watershed Protection Ordinance (WPO), effective April 12, 2008, reflect the new requirements of the January 2007 Permit re-issuance. Mobile sources must meet the applicable requirements set out in WPO sections 67.801 through 67.806, sections 67.808 through 67.810, and section 67.813. These include operating practices to reduce or eliminate the discharge of pollutants in runoff. The use of pollution prevention (P2) practices is always encouraged, and required where applicable and feasible. BMP requirements and options for each type of PGA are provided in Attachment 7.3. The specific application of BMPs is determined on a site-by-site

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basis to address the specific PGAs applicable to each facility. BMP requirements for stationary industrial and commercial sites / sources are reviewed annually and updated as necessary.

7.3.3.2 Additional Controls for Mobile Sources

Mobile business observed performing work near CWA 303(d) listed water bodies or ESAs will be inspected immediately upon observation and required to implement additional BMPs if necessary or required to cease and desist if additional BMPs cannot be provided.

7.3.4 Program Implementation

The County will meet the minimum requirements of Permit Section D.3.b., including contacting all known businesses performing work within the unincorporated area within three years of implementation of this JURMP. These activities will be conducted in collaboration with the Copermittees as part of the Regional Mobile Business Strategy discussed in RURMP Attachment 5.0.

7.4 Industrial and Commercial Component Effectiveness Assessment

Table 7.4 below summarizes the Level 1 outcomes and measures provisionally established for the Industrial and Commercial Component. Additional detail on the County's approach, including the assessment of Level 2, 3, and 4 measures, is provided in section 13.0.

Table 7.4 - Outcomes and Measures for Industrial and Commercial Activities

Program Activity	Measures of Success	
	Targeted Outcome	Measure of Success
Annual program review	Task completion	Completion (Y/N)
Outreach Events	TBD	% success
Complaint Resolution	Resolve all justified complaints	% success
Business Inspections	Meet minimum Permit standards for inspection frequency	% success

7.5 Program Review and Modification

Table 7.5 identifies modifications made to the Industrial and Commercial Component since its March 24, 2008, submittal.

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Table 7.5 - Modifications to the Industrial and Commercial Component

Date	Section(s)	Modification(s)
5-20-08	Multiple	Various non-substantive corrections including: formatting, punctuation, and grammar; insertion of textual references to tables and figures; corrections to and re-titling of tables for consistency; re-numbering and re-titling of headings for consistency.
5-20-08	7.5	Addition of Section 7.5 to allow for tracking of JURMP modifications.
5-20-08	7.3.2	Addition of previously omitted business types to Table 7.3.
06-30-10	Attachment 7.2	Revise stationary Commercial Source Profile for Pest Control to include SIC codes 0721 and 0762.
06-30-10	Attachment 7.3	The following modifications were made to Attachment 7.3: 1) Add 67.806(a)(6) to A.3. Green Waste and 67.808(a)(7)(E) to B.2.d. Animal Grooming and Washing; 2) Refine enforcement language as needed to clarify terms, e.g., the difference between wash water, rinsate, and wastewater; and 3) Clarify certain sections, e.g., Section B, p. 13, does not clearly identify grease traps and interceptors.
06-30-10	7.2.3.2	Revise additional controls for ESAs to account for various types and risk potential of site sources.
06-30-10	Table 7.1	Move <i>Equine Facilities</i> from AWM to DPW inventory.
06-30-10	7.2.2.1.1	Review, update, and incorporate TTWQ criteria for equine facilities.
06-30-10	7.2.3.2	Provide guidance matrices for developing tiered SWPPPs, a spill plan map, and modified sampling plan.
06-30-10	7.3.2	Revise text to address mobile businesses on a case-by-case basis and not categorically as high priority activities requiring annual inspection.
06-30-10	7.2.2.1.2	Update AWM TTWQ prioritization process.