

Jurisdictional Urban Runoff Management Plan

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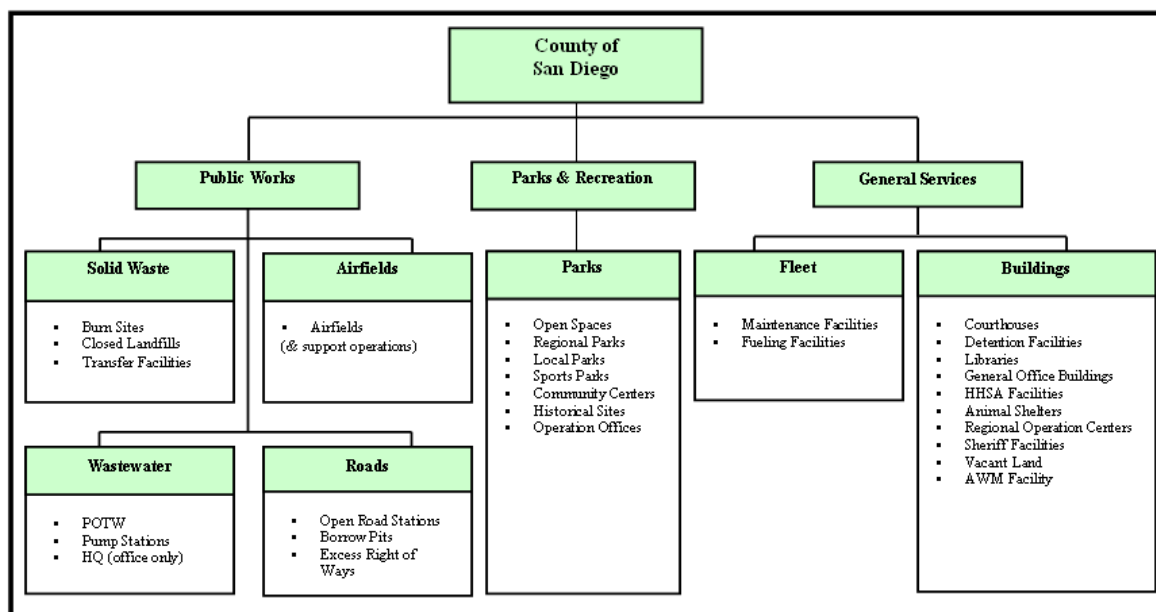
6.0 MUNICIPAL COMPONENT

6.1 Program Overview

In compliance with Permit Section D.3.a., the following sections establish a programmatic framework to identify and characterize municipal pollution sources and recommend BMPs to minimize the impact of illegal discharges on receiving waters.

The County owns and operates a wide assortment of facilities. Facilities range from general office buildings to large-scale operations such as airports, wastewater treatment plants, and closed landfills. Attachment 6.1 presents a prioritized, watershed-based list of County-owned and operated facilities. Linear infrastructure like streets and stormwater conveyance systems are also included within the County’s municipal program. The County also participates in a variety of activities that are not associated with a fixed location. These activities include “Pesticide, Herbicide, and Fertilizer application”, “Non-emergency Fire Fighting”, and “Special Events”. Figure 6.1 illustrates the organization relationship of the departments and groups primarily responsible for implementing the Municipal Component.

Figure 6.1: Overview of Departments and Groups Implementing the Municipal Component



The remainder of this section is organized according to the following municipal source types:

Roads, Streets, and Highways (section 6.2);

Municipal Separate Storm Sewer System (MS4; section 6.3);

Solid Waste Facilities (section 6.4);

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Wastewater Facilities (section 6.5);

Road Stations (section 6.6);

Fleet Maintenance (section 6.7);

Municipal Airfields (section 6.8);

Parks and Recreational Facilities (section 6.9);

Office Buildings and Other Municipal Facilities including Household Hazardous Waste Collection Facility (section 6.10);

Pesticide, Herbicide, and Fertilizer Management (section 6.11);

Non-emergency Fire Fighting Activities (section 6.12); and

Special Events (section 6.13).

Program Review and Modification (section 6.14)

6.1.1 Program Implementation and Assessment Strategy

In general, program implementation is the combined responsibility of each facility management team and the Watershed Protection Program (WPP). Stormwater program activities include the administration of the program through reviews and inventory updates, facilitation of the program through training, permitting and outreach, and feedback activities such as inspections and surveys. The implementation of the program provides a level 1 (documenting activities) effectiveness assessment outcome. Detailed program implementation roles and responsibilities are identified in each municipal sub-section below.

The target audience of the municipal program include County facility staff, lessees, contractors, event coordinators and volunteers. Through outreach and training activities, knowledge, awareness, and behavior can be enhanced providing a level 2 (raising awareness) and 3 (changing behavior) effectiveness assessment outcome. These outcomes are assessed through the feedback activities. Sources of pollutants are subsequently reduced as awareness increases and behaviors change, providing measureable reductions in pollutants (level 4 outcome [reducing loads from sources]). Figure 6.2 provides an overview of the major elements of the implementation strategy for the Municipal Element. Outcome details are further defined in each municipal section of the County's JURMP Annual Report.

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Program Implementation and Assessment Strategy			
<p style="text-align: center;">Program Implementation</p>  <ul style="list-style-type: none"> - Facility Management - DPW WPP 	<p style="text-align: center;">Target Audiences</p>  <ul style="list-style-type: none"> - Facility Staff - Lessees & Contractors - Event Coordinators & Volunteers 		<p style="text-align: center;">Sources</p>  <ul style="list-style-type: none"> - Facility Locations - Mobile Activities
OUTCOME LEVEL 1	OUTCOME LEVEL 2	OUTCOME LEVEL 3	OUTCOME LEVEL 4
Stormwater Program Activities	Knowledge & Awareness	Behaviors	Source Reductions (Measurable targets)
<p><u>Program Administration</u></p> <ul style="list-style-type: none"> ☑ Program reviews & updates ☑ Source inventory updates <p><u>Facilitation Activities</u></p> <ul style="list-style-type: none"> ☑ Staff training ☑ Hotlines <p><u>Feedback Activities</u></p> <ul style="list-style-type: none"> ☑ Facility self-inspections ☑ Inspection of leased facilities ☑ WPP facility audits ☑ Surveys & tests <p>(See Annual Report for Level 1 Results)</p>	<ul style="list-style-type: none"> ☑ General Concepts ☑ Specific Responsibilities 	<ul style="list-style-type: none"> ☑ BMP Implementation ☑ Parking Lot Sweeping ☑ Street & Road Sweeping ☑ Debris removal ☑ MS4 cleaning ☑ Storm drain stenciling ☑ Drainage enhancement ☑ Soil erosion reduction ☑ Sanitary sewer cleaning 	<ul style="list-style-type: none"> ☑ Reductions from street sweeping ☑ Reductions from parking lot sweeping ☑ Reductions from debris removal <p>(See Annual Report for Level 4 Results)</p>

Figure 6.2: Municipal Program Implementation and Assessment Strategy

6.1.2 Regulatory Requirements

Under permit section D.3.a.(8), Enforcement of Municipal Areas and Activities, the County “shall enforce its storm water ordinance for all municipal areas and activities as necessary to maintain compliance with this order”. The County’s Watershed Protection Ordinance (WPO) (Ordinance number 9926) regulates the protection of water resources and water quality by controlling polluted run-off discharges from entering receiving waters and the waters of the state (see Attachment 2.2). Municipal Facilities must meet the requirements set out in WPO sections 67.801 through 67.806, and sections 67.808 through 67.813. In addition, these facilities and activities must install, implement, and maintain all additional minimum BMPs, specified in section 67.809.

6.1.3 Facility Threat-to-Water Quality

Under permit section D.3.a.(7) the County shall inspect high priority municipal areas and activities annually. These areas include streets, parking facilities, MS4s, areas tributary to an impaired water body, landfills, water and wastewater treatment plants, solid waste transfer facilities, land application sites, maintenance and storage yards, household hazardous waste facilities, airfields, parks and recreation facilities, special events, power washing, and “other municipal areas and activities that the [County] determines may contribute a significant pollutant load to the MS4”. In order to ensure full compliance with this permit section, the County has established a Threat-to-Water Quality (TTWQ) questionnaire to determine each Municipal facility or property’s potential threat and subsequent priority rating. The questionnaire determines the TTWQ by asking questions about on-site activities, proximity to an environmentally sensitive area (ESA), and previous compliance history.

6.1.4 Municipal Priority Determination and Pollution Prevention Plans

Based on a site’s Threat-to-Water Quality a self-inspection priority is established. The lowest level threat is equivalent to the permit’s “high priority” annual self-inspection and maintenance frequency. The moderate level threat establishes a medium priority and requires quarterly self-inspection and maintenance. Sites with the highest threat to water quality are considered the highest priority and must perform monthly self-inspections and maintenance. This TTWQ priority system thereby ensures that the County is performing above and beyond permit requirements. All facilities and properties that have Pollutant Generating Activities (PGA) on-site must be reviewed for their TTWQ and must establish and maintain either a Stormwater Pollution Prevention Plan (SWPPP) or a Facility Pollution Prevention Plan (F3P). These plans will establish the PGAs that occur on-site and will provide a selection of BMPs appropriate for each PGA.

6.1.5 Municipal Audits

Audits are performed by the Watershed Protection Program staff independent of the site’s self-inspections. The TTWQ of a site determines the audit frequency. Sites determined to have the highest TTWQ are audited annually, while sites with a moderate threat are audited twice per permit cycle, and sites with a low threat are audited once per permit cycle. Audits ensure periodic review of stormwater practices and self-inspection documentation at County facilities and properties. The audit process validates compliance and reinforces the need for improved Best Management Practices to meet the requirements of the Permit and WPO. Additionally, audits provide a mechanism to evaluate County compliance and evaluate program effectiveness through annual reviews and inter-departmental reporting.

6.2 Roads, Streets, Highways, and Parking Facilities Element

6.2.1 Background

Department of Public Works (DPW) road crews work in areas all over the unincorporated County, from bustling towns to scenic county roads, and are responsible for maintaining nearly 2,000 miles of roads. This County-maintained system serves approximately 400,000 residents each day. Many segments of roads in the County are maintained by other agencies. For example, freeways and State highways (SR 52, 76, 78, 94, etc.) are maintained by Caltrans, and private roads are maintained by adjacent property owners.

6.2.2 Source Characterization

6.2.2.1 Source Inventory¹

The County operates an inventory of 1,929 miles of road surfaces. Table 6.1 provides a general inventory of roads, streets, and highways maintained by the County of San Diego and confined within the County limits. Due to its size, a more detailed roads inventory is not included in this report, but can be provided on request.

Table 6.1: General Inventory of County Roads (As of March 2008)

Type of Road Surface	Miles of Roads
Paved Roads	1,797
Unpaved Roads	105
Concrete Roads	27
Total	1,929

Figure 6.3 illustrates the general distribution of the County's road network. Detailed maps can also be accessed directly on-line at:

http://www.scdcpw.org/countyroads/crs/CRS_INDEX.html

¹ Inventory numbers are from the time of original JURMP submittal: March 24, 2008. Facility inventories are updated annually in the County's JURMP Annual Report.

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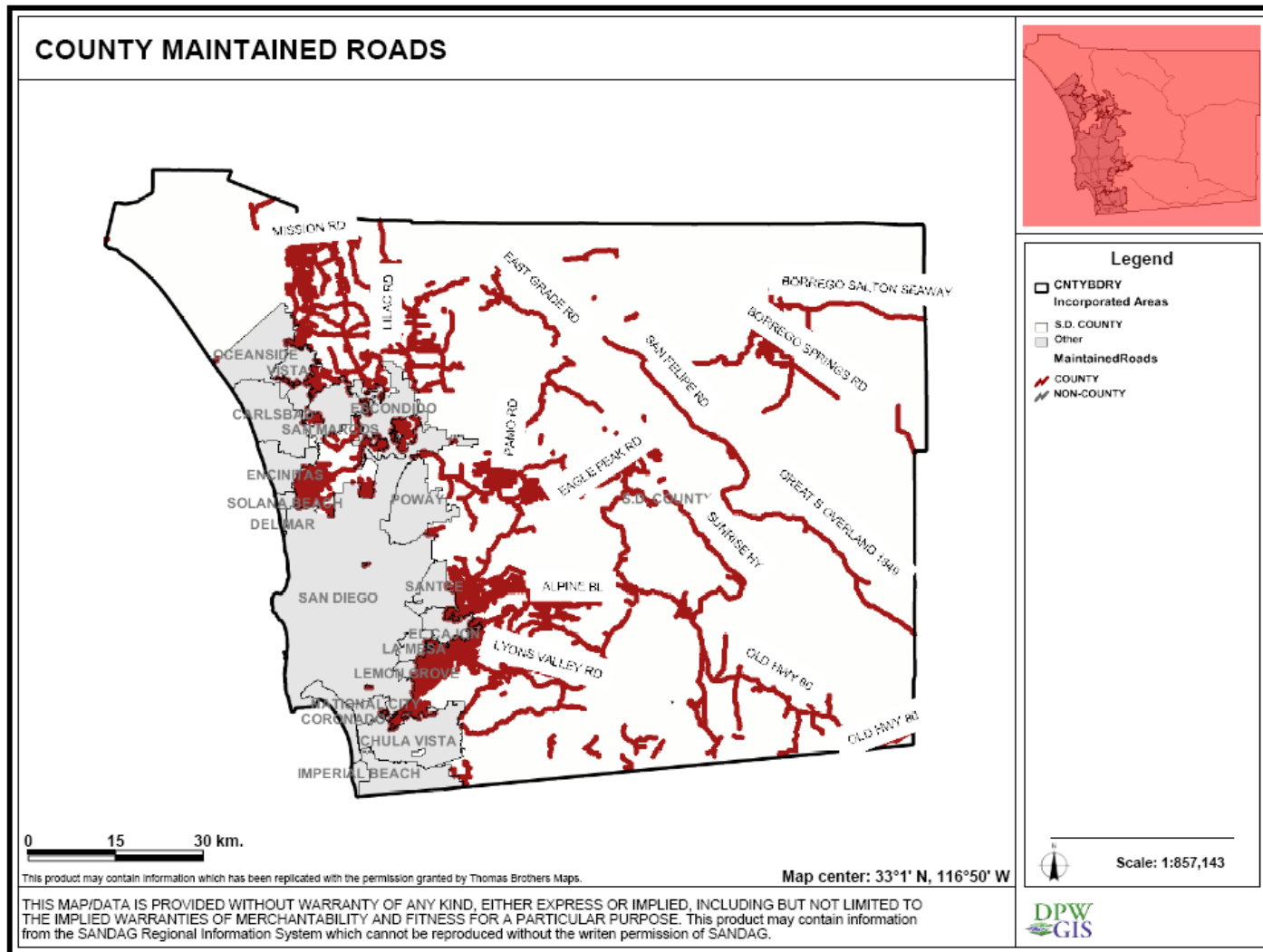


Figure 6.3: General Map of County Roads Network

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Roads are among the highest priority sources of pollutants in the unincorporated area. Permit section D.3.a(5) requires that municipal roads, streets, highways, and parking facilities possessing a curb and gutter be prioritized as high, medium, or low depending on the volumes of trash and/or debris that they generate. Because waste generation for individual road segments tends to be highly variable, the County uses the Average Daily Traffic (ADT) as an indicator of the potential volume of trash and/or debris that may be generated. Table 6.2 presents the criteria used to prioritize roads, streets, and highways for sweeping. Individual roads, streets, and highways may also be re-prioritized as appropriate based on historical data, field observations, or other relevant factors.

Table 6.2: TTWQ Prioritization Criteria for Roads, Streets and Highways

TTWQ Priority	Permit Category	Average Daily Traffic (ADT) Criterion
High	Roads, streets, highways, and parking facilities identified as consistently generating the highest volumes of trash and/or debris	ADT of more than 20,000 vehicles
Moderate	Roads, streets, highways, and parking facilities identified as consistently generating moderate volumes of trash and/or debris	ADT between 20,000 and 15,000 vehicles
Low	Roads, streets, highways, and parking facilities identified as generating low volumes of trash and/or debris	ADT of less than 15,000 vehicles

Parking facilities are assessed and reported individually in relation to the property or building in which it is associated. For example, parking-lots associated with road stations are assessed, maintained, and reported under the Road Stations Element (Section 6.6), as are lots associated with Parks (Section 6.9), Buildings (Section 6.10), etc. The parking-lot sweeping prioritization flow chart can be found in Attachment 6.4.

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Table 6.3: Overview of Program Activities Associated with Roads, Streets and Highways

Activity	Definition	Examples
Sweeping	Sweeping of roads provides two primary benefits to the County of San Diego. The more obvious benefit is the collection and removal of paper, leaves, and other visible debris in the gutters. Debris can block the catch basins and other storm water facilities, causing localized flooding during heavy rains. An equally important, but less visible benefit is the removal of metal particles, and other toxic waste products left by passing vehicles.	<ul style="list-style-type: none"> ▪ Sweeping inspection ▪ Scheduled sweeping ▪ Sweeping reports
Maintenance	One of the responsibilities of the County of San Diego, Roads Division is the maintenance of roads, streets and highways. The goal of this service is to effectively and economically preserve the County's 1,929 miles of roads infrastructure. Roads generally break up because preventive maintenance work was not done in a timely manner, there is more and heavier traffic on the roadway than it was built to handle, or the soil beneath the roadway fails. In addition there are other maintenance such as weed abatement and striping.	<ul style="list-style-type: none"> ▪ Pothole repair ▪ Resurfacing ▪ Striping ▪ Weed abatement ▪ Pavement preventative maintenance
Public Service Requests	Besides presenting a poor appearance, litter and trash can cause traffic hazards and affect drainage. Each year DPW crews remove more than 1,300 tons of litter along County-maintained roads. Driving hazards and large items are their first priority for removal. The public can help by reporting trash.	<ul style="list-style-type: none"> ▪ Graffiti toll free hotline (1-877-684-8000) ▪ Trash Help Line (858-874-4040)
Other Programs	Other programs require public assistance from businesses, or community commitment to implement new activities that can help to keep roads litter-free.	<ul style="list-style-type: none"> ▪ Adopt-A-Road program: Designates certain road sections (two miles) for private assistance with litter removal.

6.2.2.2 Activities and Pollutants

The operation and maintenance of roads, streets, and highways involves a variety of activities with the potential to contribute to stormwater pollution. Table 6.3 above provides a general overview and description of key program activities. Table 6.4 below lists the Pollutant-Generating Activities (PGAs) potentially associated with the operation of Roads, Streets, and Highways, and indicates the Pollutants-of-Concern (POCs) typically associated with them. Specific PGAs and POCs associated with Roads, Streets, and Highways vary depending on their actual uses and operations, and may therefore differ from those presented. Attachment 6.2 presents and defines a comprehensive listing of PGAs applicable to municipal operations and activities.

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Table 6.4: PGAs and POCs for Roads, Streets, and Highways.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading	X		X	X				
A.1.b	Storage of Materials	X		X			X		
A.2	WASTE HANDLING AND STORAGE								
A.2.a	Hazardous Waste						X	X	X
A.2.b	Solid Waste	X		X					
A.2.g	Green Waste		X	X		X			X
A.2.h	Recyclables / Reusables	X		X	X				
Category B: Vehicle and Equipment Activities									
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.c	Vehicle and Equipment Fueling				X		X	X	
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.b	Landscaping Activities	X	X	X					
C.1.c	Pesticide, Herbicide, and Fertilizer Application		X						X
C.1.f	Sidewalks	X		X					
C.1.j	Erodible Surfaces & Areas Under Construction	X		X			X		
C.2	ROADS AND STREETS								
C.2.a	Road and Street Maintenance	X			X		X		
C.2.b	Road and Street Use	X	X	X	X	X	X	X	X
C.3	STORM DRAIN SYSTEMS								
C.3a	Storm Drain Operation and Maintenance	X	X	X	X		X	X	X
C.3.c	Illicit Discharges & Connections	X	X	X	X	X	X	X	X
Category D: Specific Operations and Activities									
D.4	Abrasive Blasting	X			X				
D.10	Dust & Particulate-Generating Activities	X	X		X				
D.21	Painting or Coating Activities				X		X	X	
D.30	Welding				X				

6.2.3 Best Management Practice Requirements

The most important BMP for Roads, Streets, and Highways is sweeping. The County has previously established an annual street sweeping target as a minimum standard for all paved roads regardless of location, infrastructure improvements, or proximity to watercourses. In addition, regular inspections are conducted to assess specific sweeping needs. By ensuring minimum sweeping frequencies, and progressively increasing effort where needed, the County ensures an appropriate level of cleaning for all its roads. As described above, Permit section D.3.a(5) requires that roads, streets, highways, and parking facilities be prioritized as high, medium, or low depending on the volumes of trash and/or debris that they generate. The Permit also establishes minimum sweeping frequencies for each priority category. These are summarized in Table 6.5.

In most instances, the County's standards exceed these Permit minimums. Paved roads in urbanized areas or with infrastructure improvements are swept, on average, three times annually. Additionally, roadways with bike lanes are swept at least monthly to remove bicycle hazards such as glass.

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Table 6.5: Minimum Sweeping Frequencies by Threat-to-Water-Quality Priority (TTWQ)

TTWQ Priority	Sweeping Requirements
High	Twice per Month
Moderate	Monthly
Low	Annually

Sweeping data are collected by DPW road crews and reported on a monthly basis. To quantify sweeping activity, crews record the length of streets swept and the approximate amount of debris collected each month. Sweeping frequency and amounts of material collected vary by area, which may indicate regional variability in road conditions or may simply be a reflection of the size and characteristics of the road crew territory itself. Other variables include weather, linear feet of curb/gutter and sidewalk (more in urban station areas), unique occurrences (fire, flood, etc.), and contractor performance.

Roads, Streets, and Highways must also meet the applicable requirements set out in Watershed Protection Ordinance (WPO) sections 67.801 through 67.806, sections 67.808 through 67.810, and section 67.813. Per WPO section 67.809(a), municipal facilities must meet the BMP standards established by the County for equivalent operations conducted at commercial and industrial businesses. The use of pollution prevention (P2) practices is always encouraged where practicable. P2 practices that are generally recognized as being effective and economically advantageous at Roads, Streets, and Highways should be implemented. Specific BMP requirements are determined on a site-by-site basis to address the pollutant generating activities applicable to each facility. These requirements are reviewed annually and updated as necessary.

6.2.4 Program Implementation

Figure 6.4 shows the organizational relationship of DPW staff with primary responsibility for administering and implementing the Roads, Streets, and Highways element. Key roles and responsibilities are also summarized in Table 6.6.

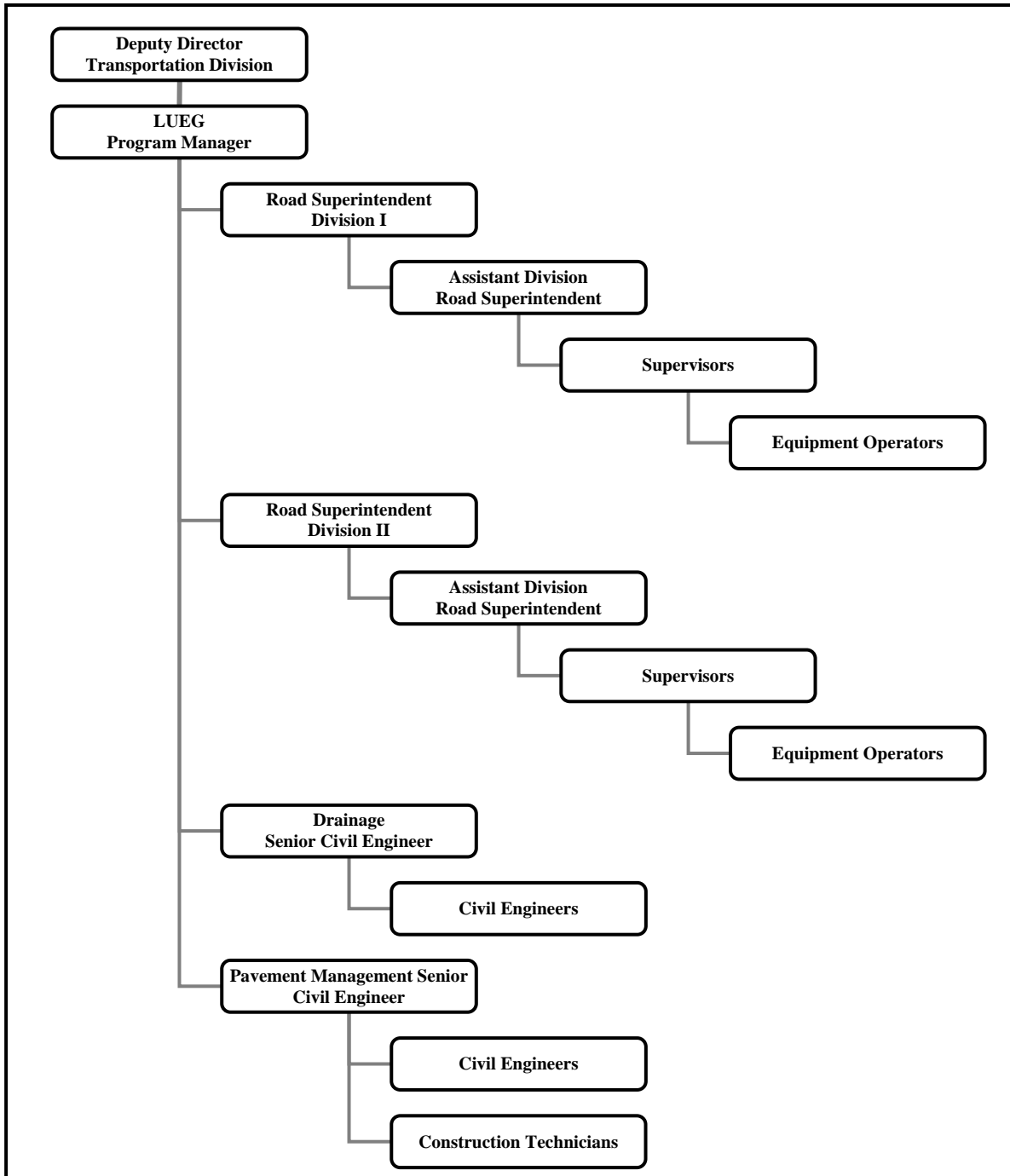


Figure 6.4: DPW Organizational Structure for the Roads Element

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Table 6.6: DPW Implementation Roles and Responsibilities for the Roads Element

Program Activity	Responsible Staff
Administrative Activities	
<u>Annual Program Reviews:</u> To ensure continued compliance with the Permit and implementation plans, program managers annually review applicable facilities inventories, BMP requirements, policies and procedures, and implementation strategies.	<ul style="list-style-type: none"> ▪ Roads Supervisors ▪ Equipment Operators
<u>Contract Administration:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Road Superintendents ▪ Asst. Road Superintendents ▪ Senior Civil Engineers
<u>Staff and Contractor Training:</u> DPW- road staff and contractors with urban runoff management responsibilities with urban runoff management responsibilities must receive training in accordance with the minimum standards set out in Section 10.2. Contractor training may either be provided by County staff or required as a contract condition.	<ul style="list-style-type: none"> ▪ Roads Supervisors
BMP Implementation	
<u>BMP Implementation:</u> BMPs are implemented by DPW- road staff and contractors as needed to address the specific activities and pollutants identified.	<ul style="list-style-type: none"> ▪ Roads Supervisors ▪ Equipment Operators ▪ Construction Technicians
<u>Contract Work:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Contractors
Compliance Verification	
<u>Compliance Documentation and Reporting:</u> All staff is responsible for ensuring adequate documentation of urban runoff within their areas of defined responsibility.	<ul style="list-style-type: none"> ▪ Roads Supervisors ▪ Senior Civil Engineers
<u>Inspections:</u> Inspections are conducted to assess maintenance and cleaning requirements.	<ul style="list-style-type: none"> ▪ Equipment Operators
<u>Special Investigations:</u> Special studies and investigations are occasionally needed to evaluate BMP options or to gather data and information necessary for program planning or assessment. These activities are determined on an as-needed basis.	<ul style="list-style-type: none"> ▪ Management

6.3 Municipal Separate Storm Sewer System (MS4) Element

6.3.1 Background

The Department of Public Works (DPW) flood control personnel are primarily responsible for the County's MS4. Flood control personnel build and maintain flood protection structures and flood warning systems, collect hydrologic data, assure projects meet flood control requirements, and comply with Federal Emergency Management Agency (FEMA) guidelines for the National Flood Insurance Program.

DPW flood control and road maintenance crews share responsibility for the maintenance of existing stormwater drainage structures and the construction of new County MS4 structures. Road maintenance crews are responsible for monitoring and maintaining portions of the MS4 that are affiliated with the maintenance of roads, streets, and highways in the unincorporated areas of the County. They are responsible for the curb and gutter systems, culverts, and storm drain structures that are part of these roads, streets, and highways. They are also responsible for some portions of the MS4 that are easily accessible by road personnel such as flood control channels immediately adjacent to a road or highway system and within the County right-of-way. Flood control personnel are responsible for all other MS4 structures that are not associated with a road, street, or highway system.

6.3.2 Source Characterization

6.3.2.1 MS4 Inventory²

The County maintains approximately 4 miles of open channel, 3,672 miles of linear MS4 systems, 2,944 drainage inlets, and five flood detention structures in the unincorporated County. Flood control and roads maintenance crews work in conjunction to inspect, repair, and clean the MS4 to ensure that the system is working correctly and that stormwater is diverted away from populated areas.

Inventories are maintained and recorded by road and flood control personnel in individual databases that are later combined for reporting purposes. The County is currently in the process of geo-coding its MS4 systems to better track their locations and other attributes. Table 6.7 provides a summary of MS4 structure types and a brief description of each; Table 6.8 identifies the inspection prioritization criteria.

² Facility inventories are updated annually in the County's JURMP Annual Report.

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Table 6.7: Inventory of MS4 Elements within the Unincorporated County (as of FY 2008-09)

Flood Control Device / Structure	Description	Linear Miles	Number
MS4 Open Channels (Self Cleaning)	Lined concrete flood control channels are inspected and maintained by County Flood Control personnel. Inlets to flood control channels prevent trash and debris from entering and are considered self-cleaning.	4	Not applicable
Linear MS4 Systems (Non-Self Cleaning)	Drainage systems located on public land or easements are primarily inspected and maintained by Road crews. Linear road drainage systems include curbed streets, gutters, and ditches that run along the road. Tracked by centerline miles.	3,672	Not applicable
Storm Drain Inlets	Any entrance to an enclosed underground storm drain system that, by design, accepts surface water. Storm drain inlets and outlets include culvert openings and storm drain inlet boxes and cleanouts. Inlets commonly have grates that prevent large pieces of debris from entering the storm drain system and/or have boxes to trap debris. Inlets have to be regularly inspected and cleaned of debris by both Road and Flood Control personnel.	Not applicable	2,944
Catch Basins	Above-ground, catch (detention) basins typically are open, dry, sometimes vegetated basins that utilize an outlet structure with a small orifice at the bottom to control the outflow of the water volume. Sediment, litter, and debris are typically captured at the inlet of the basin, or within the entire basin. Catch basins are primarily maintained by Flood Control personnel.	Not applicable	5

Total MS4

3,676

2,949

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Table 6.8: TTWQ Prioritization Criteria for MS4 Structures

TTWQ Priority	Description	Inspection Criteria
High	MS4 structures that are inspected annually	<ul style="list-style-type: none">▪ All new structures added to the MS4 inventory▪ MS4 structures prone to flooding▪ MS4 structures subject to Regional General Permit 53 standards (inspected annually between May 1 and September 30)▪ MS4 structures subject to excessive amounts of trash and debris (accumulates trash and debris greater than 33% design capacity annually)▪ MS4 structures that do not have a minimum of 2 years inspection data reflecting a low accumulation of trash and debris
Low	MS4 structures that are inspected at least every other year	<ul style="list-style-type: none">▪ MS4 structures that do not meet the criteria for high priority and have 2 years of inspection data reflecting a low accumulation of trash and debris

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6.3.2.2 Activities and Pollutants

Table 6.9 provides a comprehensive listing of the Pollutant-Generating Activities (PGAs) potentially associated with the operation and maintenance of MS4 structures, and indicates the Pollutants-of-Concern (POCs) typically associated with them. Specific PGAs and POCs associated with individual structures vary depending on their actual uses and operations, and may therefore differ from those presented. Descriptions of PGAs applicable to these and other municipal operations and activities are provided in Attachment 6.2.

Table 6.9: PGAs and POCs for MS4s.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading	X		X	X				
Category B: Vehicle and Equipment Activities									
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.c	Vehicle and Equipment Fueling				X		X	X	
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.c	Pesticide, Herbicide, and Fertilizer Application		X						X
C.1.j	Erodible Surfaces & Areas Under Construction	X		X					
C.3	STORM DRAIN SYSTEMS								
C.3a	Storm Drain Operation and Maintenance	X	X	X	X		X	X	X
C.3.b	Treatment Control BMP Maintenance	X		X	X		X	X	
C.3.c	Illicit Discharges and Connections	X	X	X	X	X	X	X	X
Category D: Specific Operations and Activities									
D.8	Cutting, Trimming, or Grinding	X			X				
D.10	Dust & Particulate-Generating Activities	X	X		X				
D.21	Painting or Coating Activities				X		X	X	
D.29	Weed Abatement and Vegetation Clearing	X		X					X

6.3.3 Best Management Practice Requirements

Permit section D.3.a.(3) requires the following in response to MS4 inspections:

- Any catch basin or storm drain inlet that is observed to have accumulated trash and debris greater than 33% of design capacity must be cleaned in a timely manner;
- Any MS4 structure that is designed to be self cleaning must be cleaned of any accumulated trash and debris immediately; and
- Open channels must be cleaned of observed litter in a timely manner.

Operation and maintenance of MS4 structures must also be conducted in accordance with the applicable requirements set out in Watershed Protection Ordinance (WPO) sections 67.801 through 67.806, sections 67.808 through 67.810, and section 67.813. Per WPO section 67.809(a), municipal facilities must meet the BMP standards established by the County for equivalent operations conducted at commercial and industrial businesses. The use of pollution prevention (P2) practices is always encouraged where practicable. P2 practices that are generally recognized as being effective and economically advantageous for MS4 structures should be implemented.

The operation and maintenance of County MS4s also involves other BMPs such as gabions, rip rap energy dissipaters, debris gates, grates, filter inserts and linear gross solids removal devices (“Lizard”). These devices are inspected and cleaned regularly with vector trucks and manual methods to ensure that they are clear of debris to prevent system backup and flooding. Specific BMP requirements are determined on a site-by-site basis to address the pollutant generating activities applicable to the area. These requirements are reviewed annually and updated as necessary.

6.3.4 Program Implementation

Figure 6.5 shows the organizational relationship of DPW staff with primary responsibility for administering and implementing the MS4 element. Key roles and responsibilities are summarized in Table 6.10.

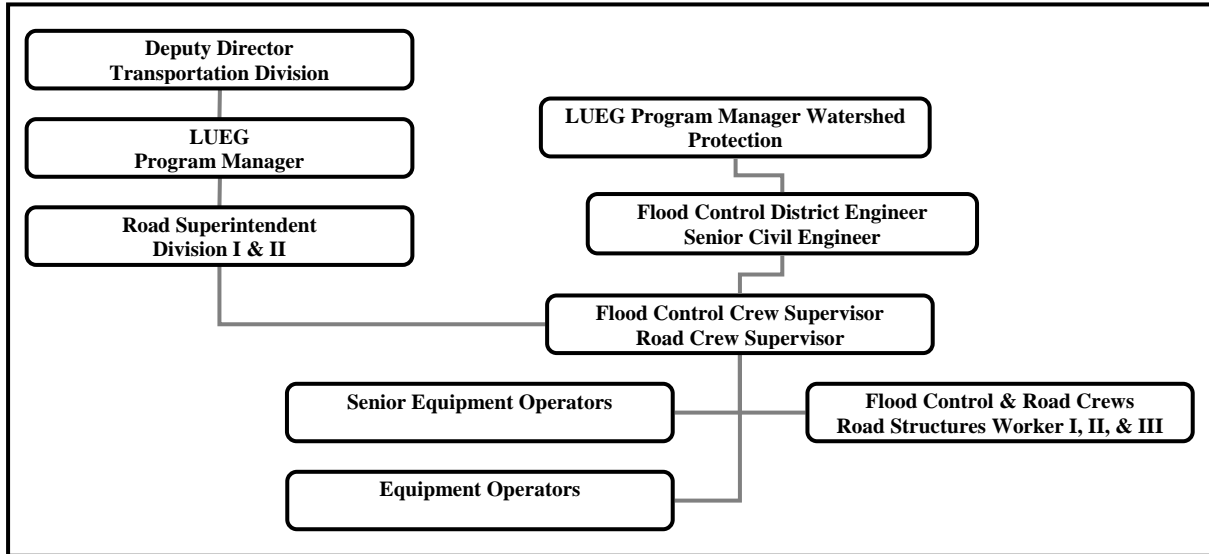


Figure 6.5: DPW Organizational Structure for the MS4 Element

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Table 6.10: DPW Implementation Roles and Responsibilities for the MS4 Element

Program Activity	Responsible Staff
Administrative Activities	
<u>Annual Program Reviews:</u> To ensure continued compliance with the Permit and implementation plans, program managers annually review applicable MS4 inventories, BMP requirements, policies and procedures, and implementation strategies.	<ul style="list-style-type: none"> Flood Control and Road Crew Supervisors
<u>Contract Administration:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation.	<ul style="list-style-type: none"> DPW Contract Administrator
<u>Staff and Contractor Training:</u> DPW – flood control staff and contractors with urban runoff management responsibilities with urban runoff management responsibilities must receive training in accordance with the minimum standards set out in Section 10.2. Contractor training may either be provided by County staff or required as a contract condition.	<ul style="list-style-type: none"> DPW Contract Administrator DPW Training Coordinator Stormwater Inspection Staff
BMP Implementation	
<u>BMP Implementation:</u> BMPs are implemented by DPW – flood control staff and contractors as needed to address the specific activities and pollutants identified.	<ul style="list-style-type: none"> Flood Control and Road Crew Supervisor Equipment Operators Road Structures Workers
<u>Contract Work:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> Contractors
Compliance Verification	
<u>Compliance Documentation and Reporting:</u> All staff is responsible for ensuring adequate documentation of urban runoff within their areas of defined responsibility.	<ul style="list-style-type: none"> Flood Control and Road Crew Supervisors and Staff
<u>Inspection of MS4 structures:</u> Flood Control and Road Crew Supervisors are responsible for managing and scheduling inspections of stormwater drainage systems and assessing the need for cleaning and maintenance of the MS4.	<ul style="list-style-type: none"> Flood Control and Road Crew Supervisors and Staff
<u>MS4 Cleaning and Maintenance</u>	<ul style="list-style-type: none"> Flood Control and Road Crew Supervisors and Staff Contractors
<u>MS4 Capital Improvement and Retrofitting Activities</u>	<ul style="list-style-type: none"> Flood Control and Road Crew Supervisors and Staff Contractors

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Program Activity	Responsible Staff
<u>Maintenance to Prevent Sanitary Sewer Infiltration</u>	<ul style="list-style-type: none">▪ Wastewater, Flood Control and Road Crew Personnel
<u>Special Investigations:</u> Special studies and investigations are occasionally needed to evaluate BMP options or to gather data and information necessary for program planning or assessment. These activities are determined on an as-needed basis.	<ul style="list-style-type: none">▪ Management

6.4 Solid Waste Facilities Element

6.4.1 Background

The County Department of Public Works (DPW) - Landfill Management Unit manages the County's inactive landfills and former refuse burning sites (burn sites). Although these sites no longer accept municipal solid waste (trash), continued monitoring and maintenance is required to minimize impacts to the environment and to protect public health and safety. To that end, the County regularly monitors landfill gas generation and migration, groundwater quality, and stormwater runoff quality. The County also maintains various systems at the sites to control landfill gas emissions, mitigate impacts to groundwater, and to manage the flow and discharge of storm water. On most of the sites, vegetation is used to control surface erosion. The County maintains inactive transfer stations that were previously used for collection of municipal solid waste in the rural communities of Campo, Dulzura, Alpine, and Julian.

6.4.2 Source Characterization

6.4.2.1 Facilities Inventory³

Inactive landfills and solid waste transfer facilities are designated high priority in the Permit and individual sites are assessed further for TTWQ by WPP. Additionally inactive landfills are also covered by the Statewide Industrial Permit. A SWPPP has been prepared for each of the inactive landfill sites. A Notice of Intent (NOI) has been completed for each inactive landfill and annual reports are submitted to the SWRCB through the industrial permit process.

Burn sites are former solid waste disposal sites where the trash was unofficially burned. They are located on private and public property and are inspected by the Department of Environmental Health (DEH) Local Enforcement Agency (LEA) to ensure compliance with California solid waste regulations. Maintenance of cover soils and post closure land use activities are regularly inspected to ensure there is no disturbance that could pose a threat to public health or the environment. A Facility Pollution Prevention Plan (F3P) will be prepared specifically for each burn site location that does not have a SWPPP.

Solid waste transfer facilities are for waste collection and temporary storage only. A Facility Pollution Prevention Plan (F3P) has been prepared specifically for each solid waste transfer bin location. As of 2010, all transfer facilities are inactive.

Table 6.11 provides a summary of the Solid Waste Facilities inventory maintained by the County. A complete inventory may be found in Attachment 6.1.1; Figure 6.6 shows the geographical distribution of these facilities.

³ Facility inventories are updated annually in the County's JURMP Annual Report.

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Table 6.11: Overview of the County's Solid Waste Facilities Inventory

Type of Property	Description
Burn Sites (Inactive)	Unauthorized areas formerly used to collect and burn wastes prior to the availability of public landfills and services. Known burn sites are generally capped with a soil barrier and monitored or may be remediated (removal of all debris & ash). Due to the accumulated burning of solid waste over time, these sites may contain heavy metals and chemicals of environmental concern.
Closed Landfills (Inactive)	Former solid waste disposal sites that have been capped and retired, but are routinely monitored to prevent any release of waste. These sites generally consist of slopes and fields with native vegetation and minimal activity.
Transfer Stations	A remote location where solid wastes and/or recyclables are collected and transferred to a larger permanent solid waste facility. The location provides temporary storage only.
Mitigation Sites	Property preserved as open space for mitigation purposes. Remediated (clean closed) burn-sites may be used as mitigation lands.
Buffer Properties	County owned property adjacent to a solid waste facility. Generally open space areas with native vegetation.

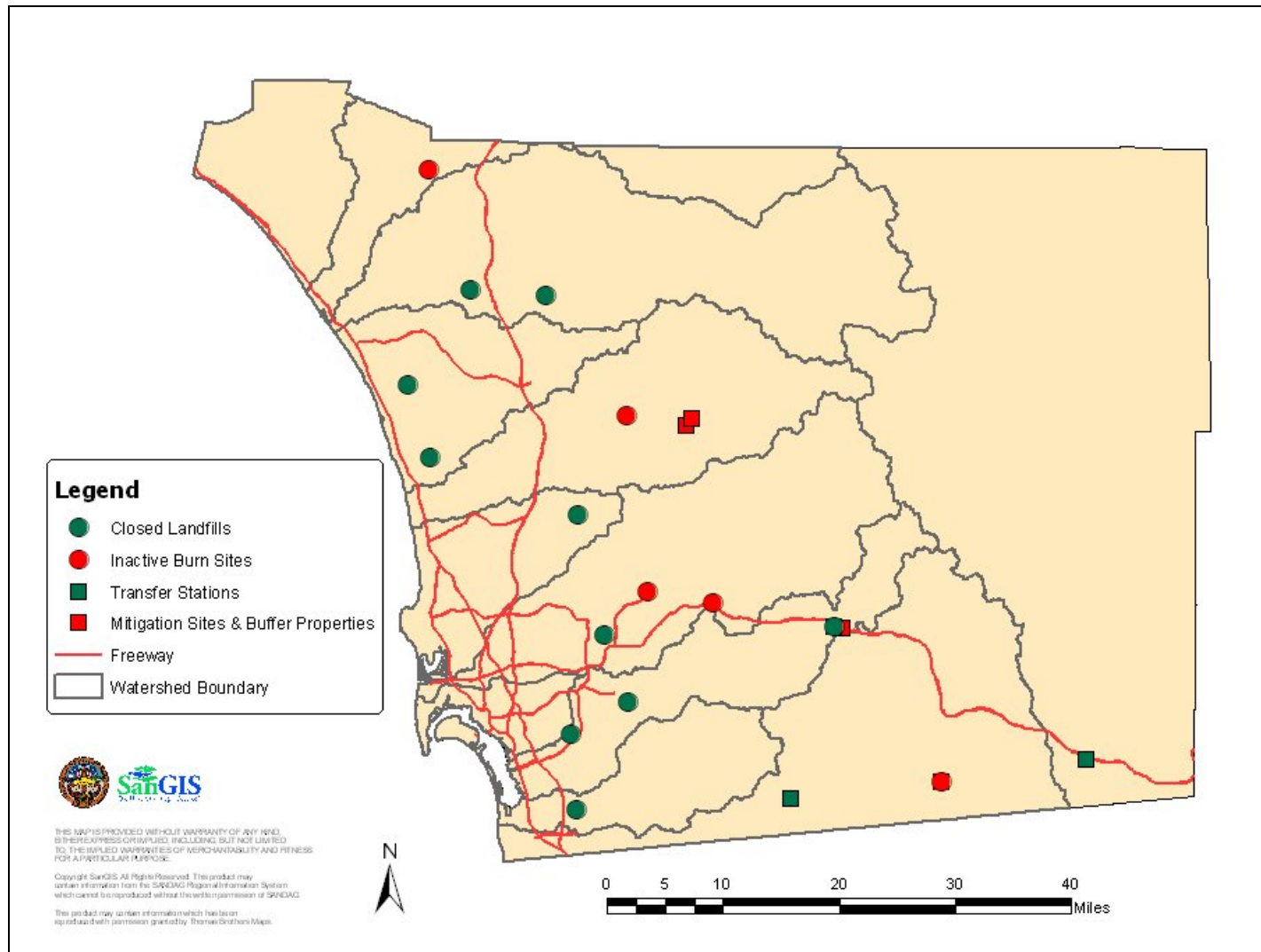


Figure 6.6: Solid Waste Facilities in the Unincorporated County

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6.4.2.2 Activities and Pollutants

Table 6.12 provides a comprehensive listing of the Pollutant-Generating Activities (PGAs) potentially associated with the operation of Solid Waste Facilities, and indicates the Pollutants-of-Concern (POCs) typically associated with them. Specific PGAs and POCs associated with individual facilities vary depending on their actual use and operation, and may therefore differ from those presented. Descriptions of PGAs applicable to these and other municipal operations and activities are provided in Attachment 6.2.

Table 6.12: PGAs and POCs for Solid Waste.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading	X							
A.1.b	Storage of Materials	X							
A.1.c	Liquid Container Storage				X		X	X	
A.2	WASTE HANDLING AND STORAGE								
A.2.a	Hazardous Waste				X		X	X	
A.2.b	Solid Waste	X		X		X			
A.2.f	Sanitary Wastes		X	X		X		X	
A.2.g	Green Waste	X	X	X		X			X
Category B: Vehicle and Equipment Activities									
B.1	VEHICLE AND EQUIPMENT STORAGE								
B.1.a	Outdoor Vehicle Storage	X			X		X	X	
B.1.b	Outdoor Equipment & Parts Storage	X			X		X	X	
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.a	Vehicle & Equipment Repair				X		X		
B.2.c	Vehicle & Equipment Fueling						X	X	
B.2.e	Equipment Cleaning	X			X		X	X	
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.a	Parking Areas	X		X	X		X	X	
C.1.b	Landscaping Activities	X	X	X		X			X
C.1.c	Pesticide, Herbicide, Fertilizer Application		X		X				X

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PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
C.1.j	Erodible Surfaces	X							
C.1.k	Earth Moving Activities & Construction	X		X			X		
C.3	STORM DRAIN SYSTEMS								
C.3a	Storm Drain Operation & Maintenance	X	X	X	X		X	X	X
C.3.b	Treatment Control BMP Maintenance	X		X					
C.3.c	Illicit Discharges & Connections	X	X	X	X	X	X	X	X
Category D: Specific Operations and Activities									
D.9	Differential Settling Maintenance	X							
D.10	Dust & Particulate-Generating Activities	X							
D.17	Gas Extraction, Well Installation & Destruction	X	X	X			X	X	
D.18	Leachate Collection System Maintenance		X		X	X	X	X	
D.19	Methane Recovery System Maintenance			X			X	X	
D.24	Recreational Uses	X		X					
D.29	Weed Abatement & Vegetation Clearing	X	X	X					X

6.4.3 Best Management Practice Requirements

Solid waste facilities must meet the applicable requirements set out in Watershed Protection Ordinance (WPO) sections 67.801 through 67.806, sections 67.808 through 67.810, and section 67.813. Per WPO section 67.809(a), municipal facilities must meet the BMP standards established by the County for equivalent operations conducted at commercial and industrial businesses. The use of pollution prevention (P2) practices is always encouraged where practicable. P2 practices that are generally recognized as being effective and economically advantageous at solid waste facilities should be implemented.

Specific BMP requirements are determined on a site-by-site basis in each Facility's Pollution Prevention Plan (F3P) or Stormwater Pollution Prevention Plan (SWPPP) to address the pollutant generating activities applicable to the facility. BMPs are implemented by Landfill management and staff. BMP requirements are reviewed annually and updated as necessary.

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6.4.4 Program Implementation

Figure 6.7 shows the organizational relationship of DPW staff with primary responsibility for administering and implementing the solid waste facilities element. Key roles and responsibilities are also summarized in Table 6.13.

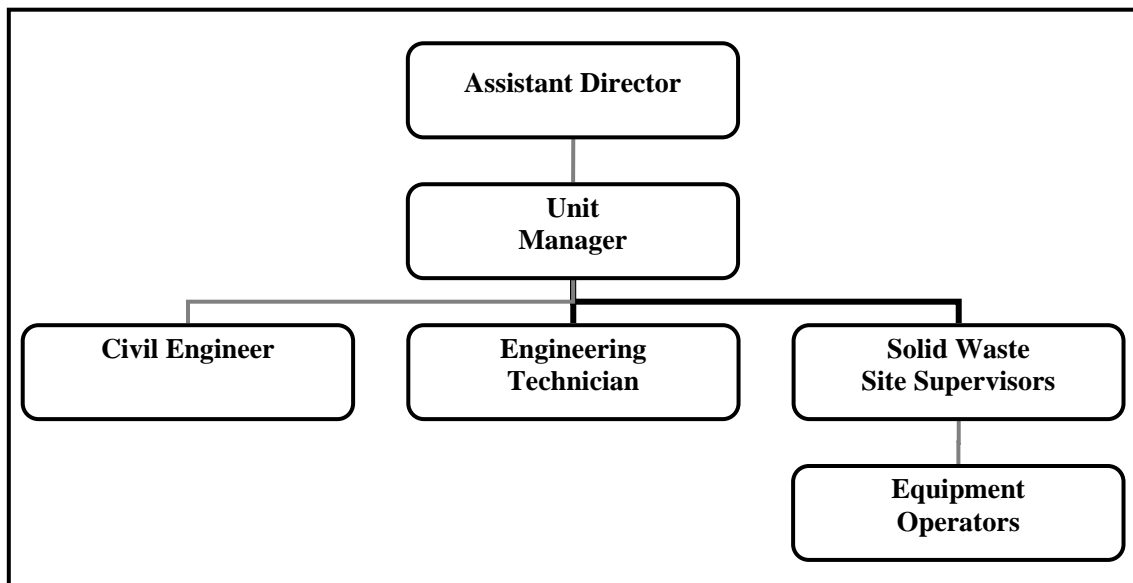


Figure 6.7: DPW Organizational Structure for the Solid Waste

Table 6.13: DPW Implementation Roles and Responsibilities for the Solid Waste

Program Activity	Responsible Staff
ADMINISTRATIVE ACTIVITIES	
<u>Annual Program Reviews:</u> To ensure continued compliance with the Permit and implementation plans, program managers annually review applicable facilities inventories, BMP requirements, policies and procedures, and implementation strategies.	<ul style="list-style-type: none"> ▪ Unit Manager ▪ Civil Engineer ▪ Engineer Technician
<u>Annual Pollution Prevention Plan Reviews:</u> Stormwater pollution prevention plans (SWPPPs) are required for all industrial high priority facilities. Facility pollution prevention plans (F3Ps) are required for those facilities that are not under the industrial permit, but covered under the municipal permit instead. Each SWPPP or F3P describes the facility location, identifies and describes on-site PGAs, describes BMP requirements, and identifies implementation roles and responsibilities. SWPPPs and F3Ps are reviewed annually and updated as needed.	<ul style="list-style-type: none"> ▪ Unit Manager ▪ Civil Engineer ▪ Engineer Technician
<u>Contract Administration:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Unit Manager ▪ Civil Engineer

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Program Activity	Responsible Staff
<u>Staff and Contractor Training:</u> DPW – solid waste facilities staff and contractors with urban runoff management responsibilities with urban runoff management responsibilities must receive training in accordance with the minimum standards set out in Section 10.2. Contractor training may either be provided by County staff or required as a contract condition.	<ul style="list-style-type: none"> ▪ Unit Manager ▪ Civil Engineer
BMP IMPLEMENTATION	
<u>SWPPP/F3P/ BMP Implementation:</u> BMPs are implemented by DPW – solid waste facilities staff and contractors as needed to address the specific activities (paving a trail, painting a building, etc.) and pollutants identified. Minimum BMP requirements and options are provided in each facility’s SWPPP or F3P.	<ul style="list-style-type: none"> ▪ Solid Waste Site Supervisors ▪ Engineer Technician ▪ Equipment Operators
<u>Contract Work:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Contractors
COMPLIANCE VERIFICATION	
<u>Compliance Documentation and Reporting:</u> All staff is responsible for ensuring adequate documentation of urban runoff within their areas of defined responsibility.	<ul style="list-style-type: none"> ▪ Civil Engineer ▪ Engineer Technician
<u>Facility Self-Inspection:</u> Facility inspections are conducted regularly based on TTWQ priority frequency to assess compliance with urban runoff management requirements. These typically consist of observations and records reviews.	<ul style="list-style-type: none"> ▪ Civil Engineer ▪ Engineer Technician
<u>Facility Auditing:</u> Auditing of solid waste facilities is conducted by the DPW WPP Audits Group. Auditing schedules and frequencies are determined based on TTWQ and compliance history.	<ul style="list-style-type: none"> ▪ DPW WPP Auditors
<u>Special Investigations:</u> Special studies and investigations are occasionally needed to gather data and information necessary for program planning or assessment. These activities are determined on an as-needed basis.	<ul style="list-style-type: none"> ▪ Varies

6.5 Wastewater Facilities Element

6.5.1 Background

The DPW Wastewater Management Program operates an extensive wastewater collection system consisting of approximately 390 miles of gravity and transmission force mains, pump stations, and water pollution control facilities. The DPW Wastewater Management program operates and maintains these facilities to prevent any adverse impact to surface and groundwater, health hazards, property damage and service interruptions resulting from accidental Sanitary Sewer Overflows (SSO).

6.5.2 Source Characterization

6.5.2.1 Facilities Inventory⁴

The Wastewater Management Program manages a variety of facilities including publicly owned treatment works, pump stations, and an office headquarters. Table 6.14 provides an updated summary of the facilities maintained and operated by the County. These facilities are also mapped in Figure 6.8; a complete inventory of wastewater facilities is included in Attachment 6.1.2.

Table 6.14: Overview of the Wastewater Facilities Inventory

Type of Property	Description
Publicly Owned Treatment Works	A wastewater processing facility that removes waste and toxins from the water in order to meet standards for human health and the environment prior to discharge.
Pump Station	Wastewater pipes and pumps used to pressurize the waste so that it can be transferred to a wastewater processing facility. The remote areas of land are generally unmanned and fenced off from the public.
Headquarters	Base of operations for DPW Wastewater personnel. Office building only.

Publicly Owned Treatment Works (POTWs) are designated as high priority in the Permit and individual sites are assessed further for TTWQ by WPP. Each of the POTWs has a discharge permit issued by the Regional Water Quality Control Board (RWQCB). Each County wastewater treatment facility pumps or treats less than 1 million gallons per day.

⁴ Facility inventories are updated annually in the County's JURMP Annual Report.

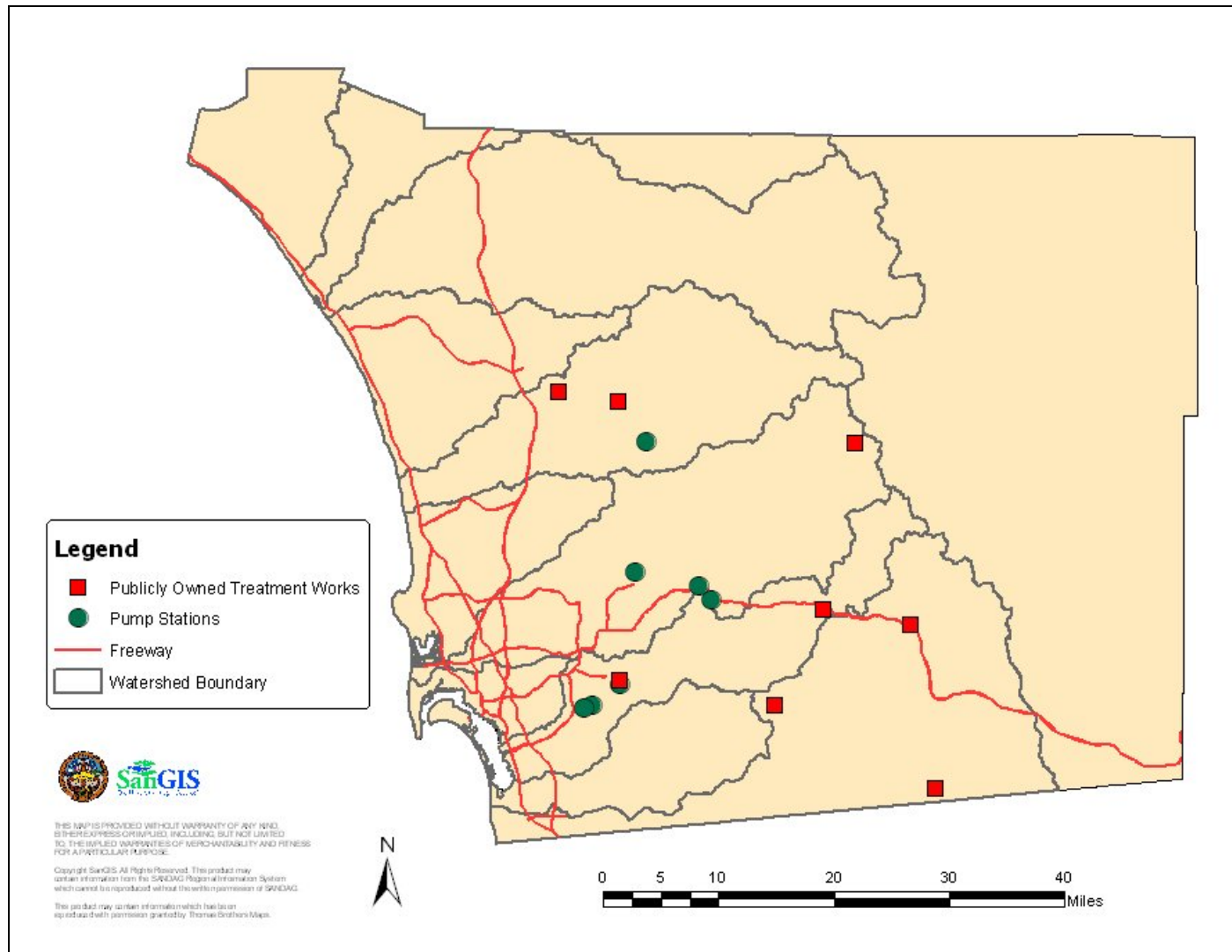


Figure 6.8: Wastewater Facilities in the Unincorporated County

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6.5.2.2 Activities and Pollutants

Table 6.15 provides a comprehensive listing of the Pollutant-Generating Activities (PGAs) potentially associated with the operation of Wastewater Facilities, and indicates the Pollutants-of-Concern (POCs) typically associated with them. Specific PGAs and POCs associated with individual facilities vary depending on their actual uses and operations, and may therefore differ from those presented. Descriptions of PGAs applicable to these and other municipal operations and activities are provided in Attachment 6.2.

Table 6.15: PGAs and POCs for Wastewater.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading		X	X					X
A.1.b	Storage of Materials		X		X	X	X	X	
A.1.c	Liquid Container Storage				X		X	X	X
A.2	WASTE HANDLING AND STORAGE								
A.2.a	Hazardous Waste						X	X	X
A.2.b	Solid Waste		X	X	X	X			
A.2.e	Liquid Waste		X		X	X	X	X	
A.2.f	Sanitary Wastes		X	X	X	X	X	X	
A.2.g	Green Waste	X	X	X		X			X
Category B: Vehicle and Equipment Activities									
B.1	VEHICLE AND EQUIPMENT STORAGE								
B.1.a	Outdoor Vehicle Storage	X			X		X	X	
B.1.b	Outdoor Equipment & Parts Storage				X		X	X	
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.a	Vehicle & Equipment Repair				X		X		
B.2.c	Vehicle & Equipment Fueling						X	X	
B.2.e	Equipment Cleaning	X	X		X	X	X	X	
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.a	Parking Areas	X		X	X		X	X	

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PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
C.1.b	Landscaping Activities	X	X	X		X			X
C.1.c	Pesticide, Herbicide, Fertilizer Application		X		X				X
C.1.f	Sidewalks	X		X					
C.1.j	Erodible Surfaces	X							
C.3	STORM DRAIN SYSTEMS								
C.3a	Storm Drain Operation and Maintenance	X	X	X	X		X	X	X
C.3.c	Illicit Discharges & Connections	X	X	X	X	X	X	X	X
Category D: Specific Operations and Activities									
D.10	Dust & Particulate-Generating Activities	X	X		X	X			
D.15	Floors, Mats, & Surface Cleaning	X				X		X	
D.25	Sludge Removal and Disposal	X	X		X	X			
D.27	Treatment Pond Maintenance	X	X			X		X	X
D.28	Wastewater Treatment	X	X	X	X	X	X	X	
D.29	Weed Abatement & Vegetation Clearing	X		X					X

6.5.3 Best Management Practice Requirements

Wastewater facilities must meet the applicable requirements set out in Watershed Protection Ordinance (WPO) sections 67.801 through 67.806, sections 67.808 through 67.810, and section 67.813. Per WPO section 67.809(a), municipal facilities must meet the BMP standards established by the County for equivalent operations conducted at commercial and industrial businesses. The use of pollution prevention (P2) practices is always encouraged where practicable. P2 practices that are generally recognized as being effective and economically advantageous at wastewater facilities should be implemented.

Specific BMP requirements are determined on a site-by-site basis in each Facility's Pollution Prevention Plan (F3P) to address the pollutant generating activities applicable to the facility. BMPs are implemented by Wastewater management and staff. BMP requirements are reviewed annually and updated as necessary.

6.5.4 Program Implementation

Figure 6.9 shows the organizational relationship of DPW staff with primary responsibility for administering and implementing the wastewater facilities element. Key roles and responsibilities are also summarized in Table 6.16.

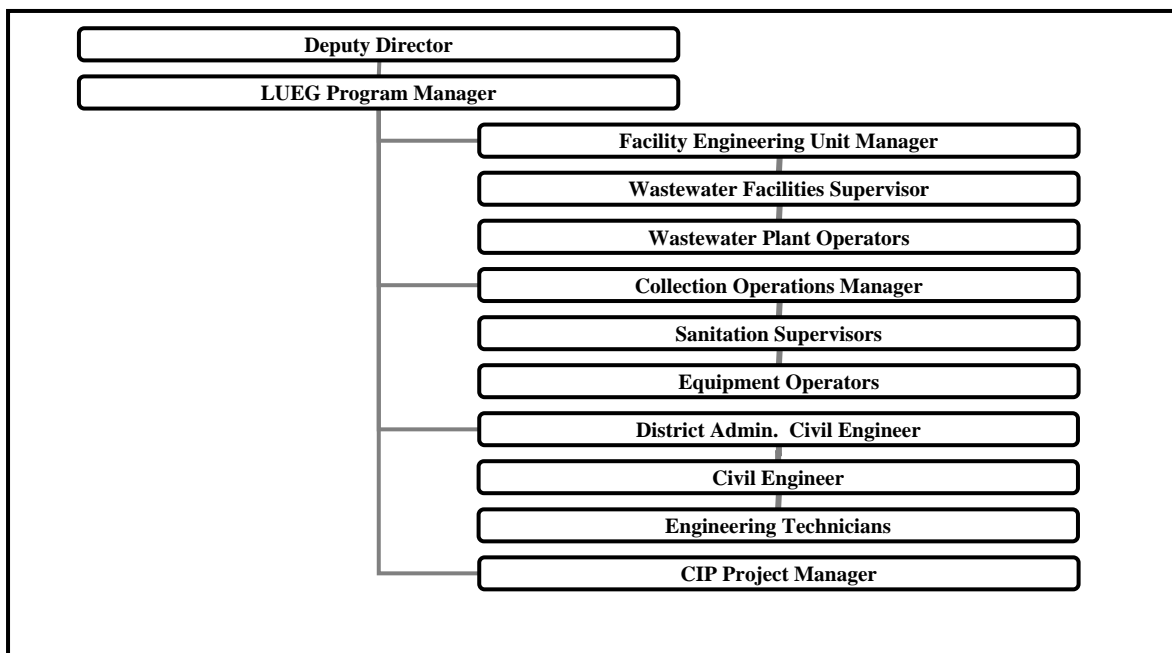


Figure 6.9: DPW Organizational Structure for the Wastewater

Table 6.16: DPW Implementation Roles and Responsibilities for the Wastewater

Program Activity	Responsible Staff
Administrative Activities	
<u>Annual Program Reviews:</u> To ensure continued compliance with the Permit and implementation plans, program managers annually review applicable facilities inventories, BMP requirements, policies and procedures, and implementation strategies.	<ul style="list-style-type: none"> ▪ Collection Operations Manager ▪ Wastewater Facilities Supervisors ▪ Sanitation Supervisors ▪ Facility Engineering Unit Manager
<u>Annual Facility Pollution Prevention Plan (F3P) Reviews:</u> F3Ps are required for all high priority facilities. Each F3P describes the facility location, identifies and describes on-site PGAs, describes BMP requirements, and identifies implementation roles and responsibilities. F3Ps are reviewed annually and updated as needed.	<ul style="list-style-type: none"> ▪ Civil Engineers ▪ Facility Engineering Unit Manager

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Program Activity	Responsible Staff
<u>Contract Administration</u> : For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ CIP Project Manager ▪ District Admin. Civil Engineer ▪ Facility Engineering Unit Manager ▪ Collection Operations Manager
<u>Staff and Contractor Training</u> : DPW - wastewater management facilities staff and contractors with urban runoff management responsibilities must receive training in accordance with the minimum standards set out in Section 10.2. Contractor training may either be provided by County staff or required as a contract condition.	<ul style="list-style-type: none"> ▪ Collection Operations Manager ▪ District Admin. Civil Engineer ▪ CIP Manager ▪ Unit Manager ▪ Wastewater Facilities Supervisors ▪ Sanitation Supervisors
Bmp Implementation	
<u>F3P/ BMP Implementation</u> : BMPs are implemented by DPW - wastewater management facilities staff and contractors as needed to address the specific activities (paving a trail, painting a building, etc.) and pollutants identified for each site or facility. Minimum BMP requirements and options are provided in each facility's F3P.	<ul style="list-style-type: none"> ▪ Wastewater Facilities Supervisors ▪ Sanitation Supervisors ▪ Equipment Operators ▪ Wastewater Plant Operators
<u>Contract Work</u> : For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Contractors
Compliance Verification	
<u>Compliance Documentation and Reporting</u> : All staff is responsible for ensuring adequate documentation of urban runoff within their areas of defined responsibility.	<ul style="list-style-type: none"> ▪ Collection Operations Manager ▪ Sanitation Supervisors ▪ Wastewater Facilities Supervisor
<u>Facility Self-Inspection</u> : Quarterly and monthly facility inspections are conducted to assess compliance with urban runoff management requirements. These typically consist of observations and records reviews.	<ul style="list-style-type: none"> ▪ Wastewater Facilities Supervisors ▪ Wastewater Plant Operators
<u>Facility Auditing</u> : Auditing of DPW - wastewater management facilities is conducted by the DPW WPP Audits Group. Auditing schedules and frequencies are determined based on TTWQ and compliance history.	<ul style="list-style-type: none"> ▪ DPW WPP Inspectors
<u>Special Investigations</u> : Special studies and investigations are occasionally needed to gather data and information necessary for program planning or assessment. These activities are determined on an as-needed basis.	<ul style="list-style-type: none"> ▪ Varies

6.6 Road Stations Element

6.6.1 Background

The DPW oversees the Roads Division, which manages road facilities servicing almost 2,000 miles of San Diego County public roads. The road station crews in bright orange vests, shirts and hard hats, are the most visible part of DPW, responding to requests for services including improvement projects, street sweeping, pothole repair, tree trimming, etc.

6.6.2 Source Characterization

6.6.2.1 Facilities Inventory⁵

The County operates a number of road facilities and oversees additional County-owned properties leased by third parties for commercial business. Roads Division crews oversee the operation of the following types of facilities: road stations, closed road stations, borrow pits, excess right-of-ways, and leased properties. “Corporate yards” are designated as high priority in the permit and individual road facilities are assessed further for TTWQ by WPP. Attachment 6.1.3 provides an updated prioritized, watershed-based inventory of the road facilities owned or operated by the County, and Table 6.17 provides a description of the major types of facilities within it. Figure 6.10 shows the geographical distribution of these facilities.

Table 6.17: Overview of the County’s Road Facilities Inventory

Type of Property	Description
Road Stations	County owned and operated staging areas for County Road Maintenance. Facilities generally include DPW and DGS operations such as buildings for equipment and material storage, crew offices, garages for vehicle and equipment maintenance, vehicle wash rack, and fueling station.
Closed Road Stations	Vacant County owned parcels of land that were once used as road stations.
Borrow Pits	Parcels of land used as temporary storage of raw materials during road maintenance.
Excess Right of Way	Open space area adjacent to roads for future expansion and clearance from private lands. May be used temporarily as a road maintenance staging area.
Leased Properties	County owned properties leased by third parties for commercial business.

⁵ Facility inventories are updated annually in the County’s JURMP Annual Report.

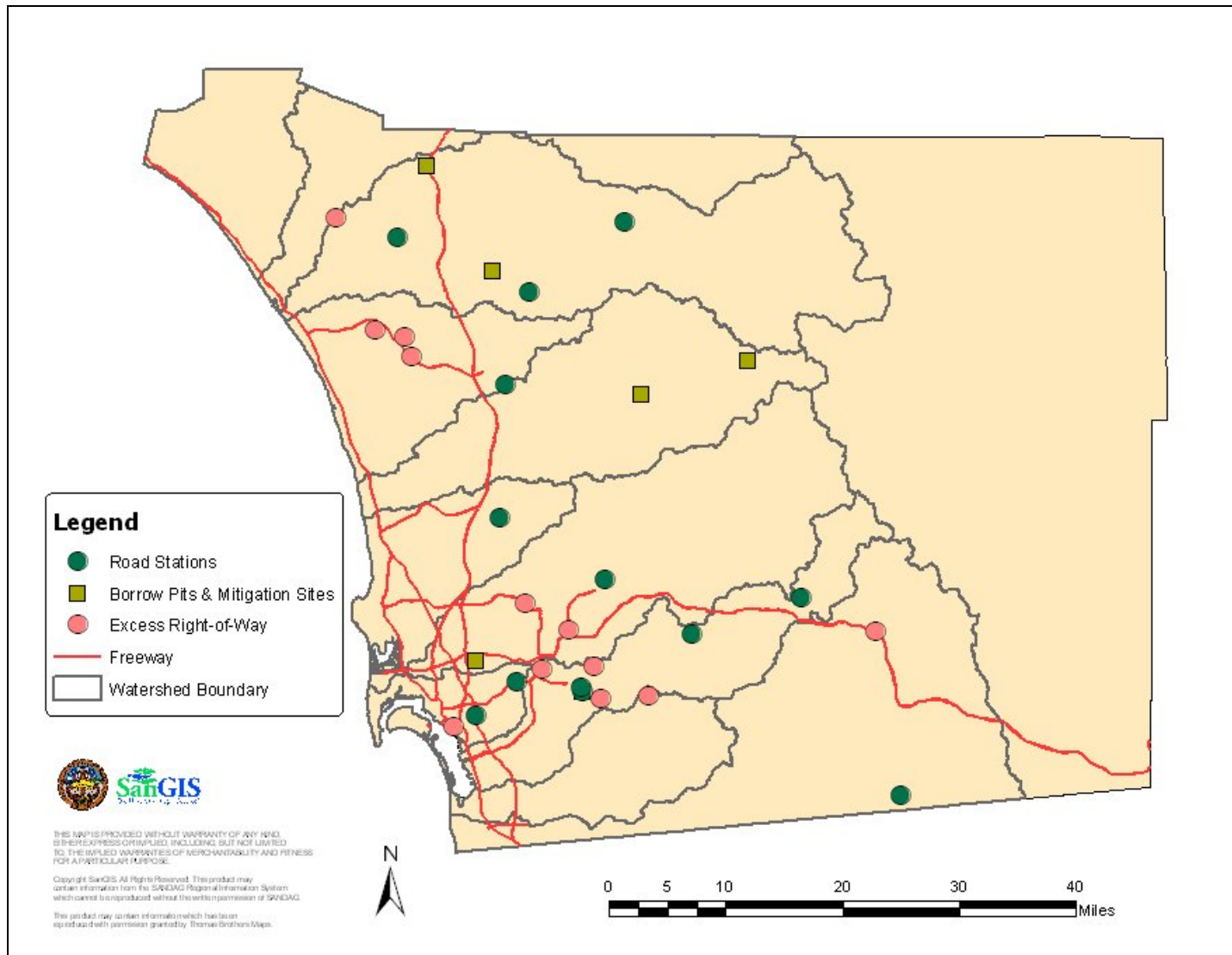


Figure 6.10: Road Stations and Related Facilities

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6.6.2.2 Activities and Pollutants

Table 6.18 provides a comprehensive listing of the Pollutant-Generating Activities (PGAs) potentially associated with the operation of each major category of Road Facility, and indicates the Pollutants-of-Concern (POCs) typically associated with them. Specific PGAs and POCs associated with individual facilities vary depending on their actual uses and operations, and may therefore differ from those presented. Descriptions of PGAs applicable to these and other municipal operations and activities are provided in Attachment 6.2.

Table 6.18: PGAs and POCs for Road Facilities.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading	X		X	X		X	X	
A.1.b	Storage of Materials	X	X		X		X	X	
A.1.c	Liquid Container Storage				X		X	X	
A.2	WASTE HANDLING AND STORAGE								
A.2.a	Hazardous Waste				X		X	X	X
A.2.b	Solid Waste			X	X	X	X	X	
A.2.e	Liquid Waste				X		X	X	
A.2.f	Sanitary Wastes		X	X		X		X	
A.2.g	Green Waste	X	X	X		X			X
A.2.h	Recyclables / Reusables	X		X	X		X	X	
Category B: Vehicle and Equipment Activities									
B.1	VEHICLE AND EQUIPMENT STORAGE								
B.1.a	Outdoor Vehicle Storage	X			X		X	X	
B.1.b	Outdoor Equipment & Parts Storage	X			X		X	X	
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.c	Vehicle & Equipment Fueling				X		X	X	
B.2.d	Vehicle Washing	X			X		X	X	
B.2.e	Equipment Cleaning	X			X		X	X	
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								

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PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
C.1.a	Parking Areas	X		X	X		X	X	
C.1.b	Landscaping Activities	X	X	X		X			X
C.1.c	Pesticide, Herbicide, Fertilizer Application		X		X				X
C.1.e	Rooftop & Downspout Maintenance	X		X	X		X		
C.1.f	Sidewalks	X		X					
C.1.h	Pressure Washing	X			X		X	X	
C.1.j	Erodible Surfaces	X							
C.3	STORM DRAIN SYSTEMS								
C.3a	Storm Drain Operation & Maintenance	X	X	X	X		X	X	X
C.3.b	Treatment Control BMP Maintenance	X		X	X		X	X	
C.3.c	Illicit Discharges & Connections	X	X	X	X	X	X	X	X
Category D: Specific Operations and Activities									
D.10	Dust & Particulate-Generating Activities	X							
D.15	Floors, Mats, & Surface Cleaning	X				X	X	X	
D.21	Painting or Coating Activities				X			X	

6.6.3 Best Management Practice Requirements

Road facilities must meet the applicable requirements set out in Watershed Protection Ordinance (WPO) sections 67.801 through 67.806, sections 67.808 through 67.810, and section 67.813. Per WPO section 67.809(a), municipal facilities must meet the BMP standards established by the County for equivalent operations conducted at commercial and industrial businesses. The use of pollution prevention (P2) practices is always encouraged where practicable. P2 practices that are generally recognized as being effective and economically advantageous at road facilities should be implemented.

Specific BMP requirements are determined on a site-by-site basis in each Facility's Pollution Prevention Plan (F3P) to address the pollutant generating activities applicable to the facility. BMPs are implemented by road management and staff. BMP requirements are reviewed annually and updated as necessary.

6.6.4 Program Implementation

Figure 6.11 shows the organizational relationship of DPW staff with primary responsibility for administering and implementing the road facilities element. Key roles and responsibilities are also summarized in Table 6.19.

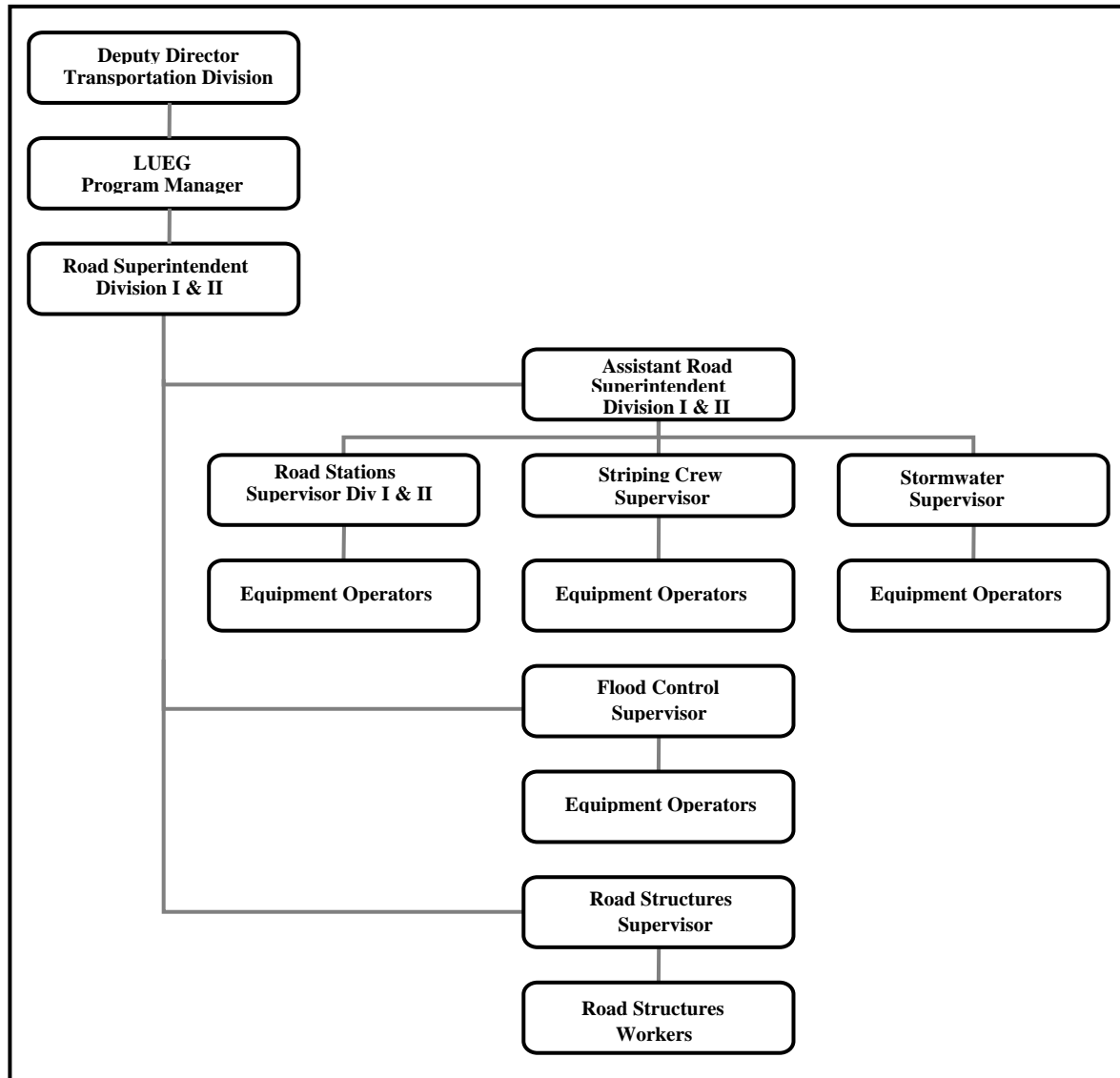


Figure 6.11: DPW Organizational Structure for the Road Facilities Element

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Table 6.19: DPW Implementation Roles and Responsibilities for the Road Facilities Element

Program Activity	Responsible Staff
Administrative Activities	
<u>Annual Program Reviews:</u> To ensure continued compliance with the Permit and implementation plans, program managers annually review applicable facilities inventories, BMP requirements, policies and procedures, and implementation strategies.	<ul style="list-style-type: none"> ▪ Roads stations Supervisors ▪ Equipment Operators ▪ Roads Workers
<u>Annual Facility Pollution Prevention Plan (F3P) Reviews:</u> F3Ps are required for all high priority facilities. Each F3P describes the facility location, identifies and describes on-site PGAs, describes BMP requirements, and identifies implementation roles and responsibilities. F3Ps are reviewed annually and updated as needed.	<ul style="list-style-type: none"> ▪ Road station Supervisors, Equipment Operators, and Roads Workers
<u>Contract Administration:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Transportation Division, ▪ Road Stations Manages
<u>Staff and Contractor Training:</u> DPW- road stations staff and contractors with urban runoff management responsibilities with urban runoff management responsibilities must receive training in accordance with the minimum standards set out in Section 10.2. Contractor training may either be provided by County staff or required as a contract condition.	<ul style="list-style-type: none"> ▪ Road station Supervisors ▪ Equipment Operators, ▪ Roads Workers ▪ Contractors staff
BMP Implementation	
<u>F3P/ BMP Implementation:</u> BMPs are implemented by DPW- road stations staff and contractors as needed to address the specific activities (paving a trail, painting a building, etc.) and pollutants identified for each site or facility. Minimum BMP requirements and options are provided in each facility's F3P.	<ul style="list-style-type: none"> ▪ Road Stations Equipment Operators ▪ Roads Workers ▪ Stormwater Teams
<u>Contract Work:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Contractors
Compliance Verification	
<u>Compliance Documentation and Reporting:</u> All staff is responsible for ensuring adequate documentation of urban runoff within their areas of defined responsibility.	<ul style="list-style-type: none"> ▪ All staff

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Program Activity	Responsible Staff
<u>Facility Self-Inspection</u> : Monthly facility inspections are conducted to assess compliance with urban runoff management requirements. These typically consist of observations and records reviews.	<ul style="list-style-type: none">▪ Equipment Operators▪ Roads Workers
<u>Facility Auditing</u> : Auditing of Road Station facilities is conducted by the DPW WPP Audits Group. Auditing schedules and frequencies are determined based on TTWQ and compliance history.	<ul style="list-style-type: none">▪ DPW WPP Auditors
<u>Special Investigations</u> : Special studies and investigations are occasionally needed to gather data and information necessary for program planning or assessment. These activities are determined on an as-needed basis.	<ul style="list-style-type: none">▪ Varies

6.7 Fleet Maintenance Element

6.7.1 Background

The Department of General Services (DGS) oversees the Fleet Management Division which provides support, repair and preventive maintenance services for County own vehicles and equipment. Fleet Management maintains a part shop, manages the County's vehicle replacement program, supervise operations of the fueling station facilities, and manages yearly vehicle registration, licensing, emissions and safety inspection processes.

6.7.2 Source Characterization

6.7.2.1 Facilities Inventory⁶

The County of San Diego Fleet Management Division operates the County's garage facilities and oversees the fuel stations. "Corporate yards" are designated as high priority in the permit and individual fleet facilities are assessed further for TTWQ by WPP. Table 6.20 provides a description of the types of facilities. Attachment 6.1.4 provides an updated prioritized, watershed-based inventory of all of the garage facilities and fuel stations.

Table 6.20: Overview of the County's Fleet Facilities Inventory

Type of Property	Definition
Garage	An establishment where cars are repaired, serviced, or parked. Commonly co-located with DPW Road Stations.
Fuel Station	A facility equipped to dispense fuel and lubricants for motor vehicles. Commonly co-located with DPW Road Stations.

6.7.2.2 Activities and Pollutants

Table 6.21 lists the Pollutant-Generating Activities (PGAs) potentially associated with the operation of each major category of Fleet Management Division facilities, and indicates the Pollutants-of-Concern (POCs) typically associated with them. Specific PGAs and POCs associated with individual facilities vary depending on their actual uses and operations, and may therefore differ from those presented. Attachment 6.2 presents and describes a comprehensive listing of PGAs applicable to municipal operations and activities.

⁶ Facility inventories are updated annually in the County's JURMP Annual Report.

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Table 6.21: PGAs and POCs for Fleet.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading			X			X	X	
A.1.b	Storage of Materials				X		X	X	
A.1.c	Liquid Container Storage				X		X	X	
A.2	WASTE HANDLING AND STORAGE								
A.2.a	Hazardous Waste				X		X	X	X
A.2.b	Solid Waste			X	X	X	X	X	
A.2.e	Liquid Waste				X		X	X	
A.2.h	Recyclables / Reusables			X	X		X	X	
Category B: Vehicle and Equipment Activities									
B.1	VEHICLE AND EQUIPMENT STORAGE								
B.1.a	Outdoor Vehicle Storage	X			X		X	X	
B.1.b	Outdoor Equipment & Parts Storage				X		X	X	
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.a	Vehicle and Equipment Repair				X		X	X	
B.2.b	Changing Vehicle Fluids				X		X	X	
B.2.c	Vehicle & Equipment Fueling				X		X	X	
B.2.d	Vehicle Washing	X			X		X	X	
B.2.e	Equipment Cleaning	X			X		X	X	X
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.a	Parking Areas	X		X	X		X	X	
C.1.b	Landscaping Activities	X	X	X		X			X
C.1.e	Rooftop & Downspout Maintenance	X		X	X		X		
C.1.f	Sidewalks	X		X					
C.1.h	Pressure Washing	X			X		X	X	
C.3	STORM DRAIN SYSTEMS								
C.3.c	Illicit Discharges & Connections	X	X	X	X	X	X	X	X
Category D: Specific Operations and Activities									

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PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
D.4	Abrasive Blasting	X			X		X	X	
D.8	Cutting, Trimming, or Grinding				X		X	X	
D.11	Fabrication				X		X		
D.15	Floors, Mats, & Surface Cleaning	X			X	X	X	X	
D.21	Painting or Coating Activities				X			X	
D.30	Welding				X				

6.7.3 Best Management Practice Requirements

Fleet Management locations must meet the applicable requirements set out in Watershed Protection Ordinance (WPO) sections 67.801 through 67.806, sections 67.808 through 67.810, and section 67.813. Per WPO section 67.809(a), municipal facilities must meet the BMP standards established by the County for equivalent operations conducted at commercial and industrial businesses. The use of pollution prevention (P2) practices is always encouraged, as practicable. P2 practices that are generally recognized as being effective and economically advantageous at Fleet Management locations should be implemented.

Specific BMP requirements are determined on a site-by-site basis in each Facility's Pollution Prevention Plan (F3P) to address the PGAs applicable to the facility. BMPs are implemented by fleet management and staff. BMP requirements are reviewed annually and updated as necessary.

6.7.4 Program Implementation

Figure 6.12 shows the organizational flow chart for DGS staff with primary responsibility for administering and implementing the Fleet Management element. Key roles and responsibilities are also summarized in Table 6.22.

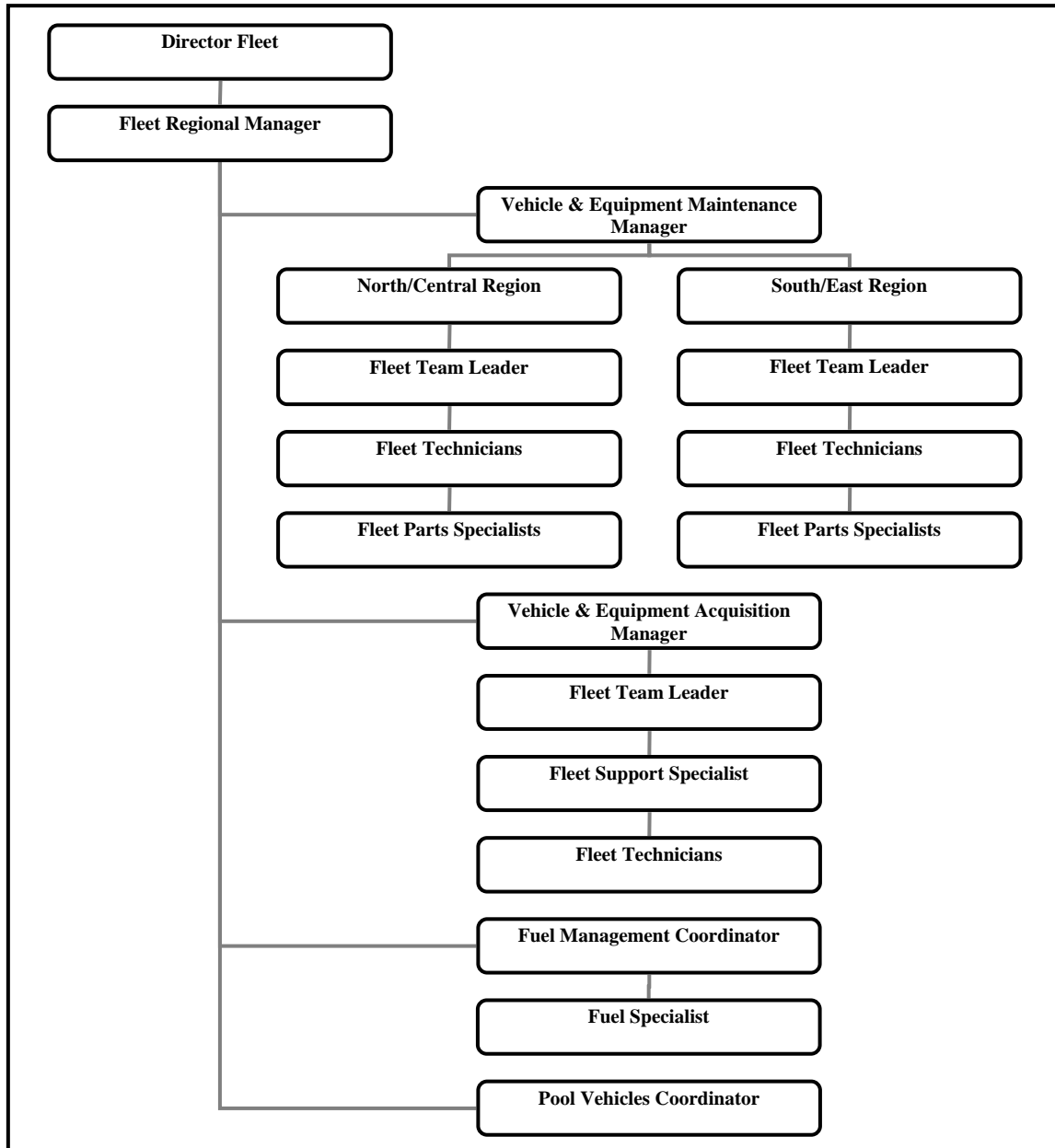


Figure 6.12: DGS Organizational Structure for the Fleet Management Element

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Table 6.22: DGS Implementation Roles and Responsibilities for Fleet

Program Activity	Responsible Staff
Administrative Activities	
<u>Annual Program Reviews:</u> To ensure continued compliance with the Permit and implementation plans, program managers annually review applicable facilities inventories, BMP requirements, policies and procedures, and implementation strategies.	<ul style="list-style-type: none"> ▪ Director Fleet ▪ Fleet Manager ▪ Fleet Team Leaders
<u>Annual Facility Pollution Prevention Plan (F3P) Reviews:</u> F3Ps are required for all high priority facilities. Each F3P describes the facility location, identifies and describes on-site PGAs, describes BMP requirements, and identifies implementation roles and responsibilities. F3Ps are reviewed annually and updated as needed.	<ul style="list-style-type: none"> ▪ Director Fleet ▪ Fleet Manager ▪ Fleet Team Leaders
<u>Contract Administration:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Contractors
<u>Staff and Contractor Training:</u> DGS- fleet management facilities staff and contractors with urban runoff management responsibilities with urban runoff management responsibilities must receive training in accordance with the minimum standards set out in Section 10.2. Contractor training may either be provided by County staff or required as a contract condition.	<ul style="list-style-type: none"> ▪ Fleet Manager ▪ Fleet Team Leaders ▪ Fleet Technicians
BMP Implementation	
<u>F3P/ BMP Implementation:</u> BMPs are implemented by DGS – fleet management facilities staff and contractors as needed to address the specific activities and pollutants identified for each site or facility. Minimum BMP requirements and options are provided in each facility’s F3P.	<ul style="list-style-type: none"> ▪ Fleet Team Leaders ▪ Fleet Technicians ▪ Fuel Specialist
<u>Contract Work:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Contractors
Compliance Verification	

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Program Activity	Responsible Staff
<u>Compliance Documentation and Reporting</u> : All staff is responsible for ensuring adequate documentation of urban runoff within their areas of defined responsibility.	<ul style="list-style-type: none"> ▪ Fleet Manager ▪ Fleet Team Leaders ▪ Fleet Technicians ▪ Fuel Specialist
<u>Facility Self-Inspection</u> : Monthly facility inspections are conducted to assess compliance with urban runoff management requirements. These typically consist of observations and records reviews.	<ul style="list-style-type: none"> ▪ Fleet Coordinators ▪ Fleet Technicians ▪ Fleet Parts Specialists ▪ Fleet Support Specialist ▪ Fuel Specialist
<u>Facility Auditing</u> : Auditing of DGS – fleet management facilities staff is conducted by the DPW WPP Audits Group. Auditing schedules and frequencies are determined based on TTWQ and compliance history.	<ul style="list-style-type: none"> ▪ DPW WPP Auditors
<u>Special Investigations</u> : Special studies and investigations are occasionally needed to gather data and information necessary for program planning or assessment. These activities are determined on an as-needed basis.	<ul style="list-style-type: none"> ▪ Varies

6.8 Municipal Airfields Element

6.8.1 Background

The County owns and operates four municipal airports within Region 9. These airports are located in the communities of Fallbrook, El Cajon, Carlsbad, and Ramona. Although all County airports share the basic similarity of providing flight and transportation services, each has unique surroundings and distinctive characteristics.

The DPW Transportation Division operates airports where activities typically include the maintenance of runways, ramps, terminals, hangars, and access roads. Airport operations also include leasing hangars, aircraft tie down space, and other areas of the airport property. Lessee's are required to comply with the "Rules and Regulations" for County Airports, which includes stormwater and water quality requirements.

6.8.2 Source Characterization

6.8.2.1 Source Inventory⁷

Table 6.23 is a summary inventory of County Airports. Attachment 6.1.5 contains a complete inventory of the municipal airfields (Permit sections D.3.a(1) and J.1.a.(1)(e)(i)). Municipal airports are designated as high priority facilities in the Permit and individual sites are assessed further for TTWQ by WPP.

Table 6.23: Overview of the County's Airports Inventory (As of March 2008)

Airport	Address	Acreage
Fallbrook Community Airport	2100 S. Mission Road, Fallbrook	290
Gillespie Field Airport	1960 Joe Crosson Drive, El Cajon	775
McClellan-Palomar Airport	2198 Palomar Airport Road, Carlsbad	487
Ramona Airport	2450 Montecito Road, Ramona	378

6.8.2.2 Activities and Pollutants

Table 6.24 provides a list of pollutant-generating activities typically conducted at Airport Facilities. It also shows the Pollutants-of-Concern generally associated with each PGA type.

⁷ Inventory numbers are from the time of original JURMP submittal: March 24, 2008. Facility inventories are updated annually in the County's JURMP Annual Report.

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Aircraft maintenance, fueling and repair are the primary activities that occur at airports. Secondary activities such as ramp and runway inspection and maintenance are required due to safety and maintaining compliance with the Federal Aviation Administration (FAA) regulations. Many of these activities already incorporate good BMPs that assist with the facilitation of watershed protection.

Table 6.24: PGAs and POCs for Airports.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading	X	X	X	X		X	X	
A.1.b	Storage of Materials	X	X		X		X	X	
A.1.c	Liquid Container Storage						X	X	
A.2	WASTE HANDLING AND STORAGE								
A.2.a	Hazardous Waste				X		X	X	
A.2.b	Solid Waste		X	X	X	X		X	
A.2.c	Food Grease & Oil						X	X	
A.2.f	Sanitary Wastes		X	X		X		X	
A.2.g	Green Waste	X	X	X		X			X
A.2.h	Recyclables / Reusables			X	X		X	X	
Category B: Vehicle and Equipment Activities									
B.1	VEHICLE AND EQUIPMENT STORAGE								
B.1.a	Outdoor Vehicle Storage	X			X		X	X	
B.1.b	Outdoor Equipment & Parts Storage				X		X	X	
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.a	Vehicle & Equipment Repair				X		X	X	
B.2.b	Changing Vehicle Fluids				X		X	X	
B.2.c	Vehicle & Equipment Fueling				X		X	X	
B.2.d	Vehicle Washing	X			X		X	X	
B.2.e	Equipment Cleaning	X			X		X	X	
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.a	Parking Areas	X		X	X		X	X	

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PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
C.1.b	Landscaping Activities	X	X	X		X			X
C.1.e	Rooftop & Downspout Maintenance	X		X	X		X	X	
C.1.f	Sidewalks	X		X					
C.1.g	Break Areas & Public Areas		X		X	X			
C.1.h	Pressure Washing	X		X	X		X	X	
C.1.i	Fire Sprinkler Testing & Maintenance				X	X			
C.1.j	Erodible Surfaces	X							
C.1.k	Earth Moving Activities & Areas Under Construction	X		X			X		
C.3	STORM DRAIN SYSTEMS								
C.3a	Storm Drain Operation & Maintenance	X	X	X	X		X	X	X
C.3.b	Treatment Control BMP Maintenance	X		X	X		X	X	
C.3.c	Illicit Discharges & Connections	X	X	X	X	X	X	X	X
Category D: Specific Operations and Activities									
D.1	Accident and Medical Emergency Response			X		X			
D.4	Abrasive Blasting	X			X		X	X	
D.5	Casting, Forging, or Forming				X			X	
D.8	Cutting, Trimming, or Grinding				X		X	X	
D.10	Dust & Particulate-Generating Activities	X			X				
D.15	Floors, Mats, & Surface Cleaning	X				X	X	X	
D.16	Food Preparation			X		X	X		
D.21	Painting or Coating Activities				X			X	
D.23	Ramp & Runway Maintenance	X		X	X		X	X	
D.30	Welding				X				

6.8.3 Best Management Practice Requirements

County Airports must meet the requirements set forth in the Watershed Protection Ordinance (WPO) sections 67.801 through 67.806, 67.808 through 67.810, and where applicable 67.813 and 67.814. In addition, these facilities must install, implement, and maintain all additional BMPs specified in section 67.809 for industrial areas and activities at the municipal facility. Upgrades to the WPO, effective April 12, 2008, reflect the new requirements of the Permit.

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Airports are designated as industrial facilities under the Standardized Industrial Classification: 4581. This designation requires airports to comply with the General Statewide Industrial Permit. Notice of Intent (NOI), SWPPPs and annual reports are completed for each airport and updated annually. The County of San Diego Airports program participates in group monitoring to fulfill monitoring requirements for the Statewide Industrial Permit.

Specific BMP requirements are determined on a site-by-site basis in each SWPPP to address PGAs applicable to the facility. BMPs are implemented by airports management and staff. BMP requirements are reviewed annually and updated as necessary.

6.8.4 Program Implementation

Figure 6.13 shows an organizational flow chart for DPW staff with primary responsibility for administering and implementing the Airports element.

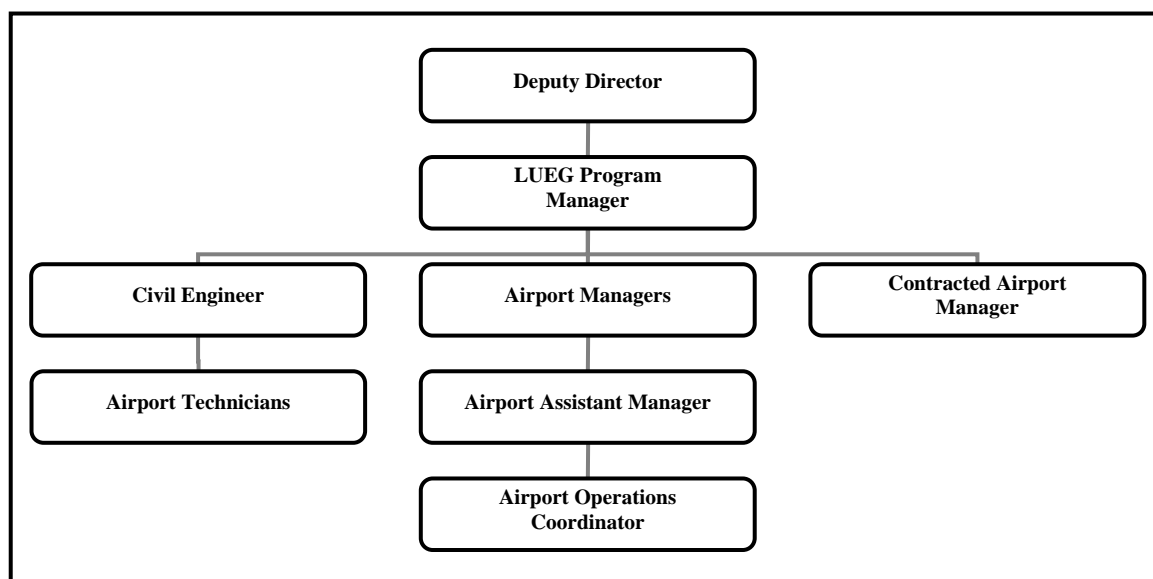


Figure 6.13: DPW Organizational Structure for the Airports Element

Two County airports are within the jurisdictional boundaries of incorporated cities: Gillespie Airport in the city of El Cajon and Palomar-McClellan Airport in the City of Carlsbad. Stormwater facility inspections may be coordinated with the County Airport representatives and stormwater inspectors from El Cajon and Carlsbad, respectively, to ensure compliance with water quality laws and regulations. Leases and contracts for fixed base operators, lessees, tenants, permit holders, and other airport users require each to abide by the “County of San Diego Airports Rules and Regulations”, which includes general and specific provisions for airport activities, as well as stormwater and water quality prohibitions.

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Table 6.25 describes the designation of responsibilities and minimum frequencies for the program planning, facilitation activities, BMP implementation and feedback and verification review for Airport Facilities elements.

Table 6.25: Program Implementation Roles and Responsibilities for Airports

Program Activity	Responsible Staff
Administrative Activities	
<u>Annual Program Reviews</u> : To ensure continued compliance with the Permit and implementation plans, program managers annually review applicable facilities inventories, sources, BMP requirements, policies and procedures, and implementation strategies.	<ul style="list-style-type: none"> ▪ Airport Managers ▪ Civil Engineer ▪ Contracted Airport Manager
<u>Annual Stormwater Pollution Prevention Plan (SWPPP) Reviews</u> : SWPPPs are required for all high priority facilities. Each SWPPP describes the facility location, identifies and describes on-site PGAs, describes BMP requirements, and identifies implementation roles and responsibilities. SWPPPs are reviewed annually and updated as needed.	<ul style="list-style-type: none"> ▪ Airport Managers ▪ Civil Engineer ▪ Contracted Airport Manager ▪ Airport Technicians ▪ Airport Assistant Manager
<u>Contract Administration</u> : For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Contractors
<u>Staff and Contractor Training</u> : DPW – airport facilities staff and contractors with urban runoff management responsibilities with urban runoff management responsibilities must receive training in accordance with the minimum standards set out in Section 10.2. Contractor training may either be provided by County staff or required as a contract condition.	<ul style="list-style-type: none"> ▪ Airport Managers ▪ Civil Engineer ▪ Contracted Airport Manager ▪ Airport Technicians ▪ Airport Assistant Manager ▪ Airport Coordinators ▪ Airport Operators
BMP Implementation	
<u>F3P/ BMP Implementation</u> : BMPs are implemented by DPW – airport facilities staff and contractors as needed to address the specific activities (paving a trail, painting a building, etc.) and pollutants identified for each site or facility. Minimum BMP requirements and options are provided in each facility's SWPPP.	<ul style="list-style-type: none"> ▪ Airport Managers ▪ Civil Engineer ▪ Contracted Airport Manager ▪ Airport Technicians ▪ Airport Assistant Manager ▪ Airport Coordinators ▪ Airport Operators

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Program Activity	Responsible Staff
<p><u>Contract Work</u>: For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.</p>	<ul style="list-style-type: none"> ▪ Contractors
Compliance Verification	
<p><u>Compliance Documentation and Reporting</u>: All staff is responsible for ensuring adequate documentation of urban runoff within their areas of defined responsibility.</p>	<ul style="list-style-type: none"> ▪ Airport Managers ▪ Civil Engineer ▪ Contracted Airport Manager ▪ Airport Technicians ▪ Airport Assistant Manager ▪ Airport Coordinators ▪ Airport Operators
<p><u>Facility Self-Inspection</u>: Quarterly facility inspections are conducted to assess compliance with urban runoff management requirements. These typically consist of observations and records reviews.</p>	<ul style="list-style-type: none"> ▪ Airport Managers ▪ Contracted Airport Manager ▪ Airport Technicians ▪ Airport Assistant Manager
<p><u>Facility Auditing</u>: Auditing of fleet management facilities is conducted by the DPW WPP Audits Group. Auditing schedules and frequencies are determined based on TTWQ and compliance history.</p>	<ul style="list-style-type: none"> ▪ DPW WPP Auditors
<p><u>Special Investigations</u>: Special studies and investigations are occasionally needed to gather data and information necessary for program planning or assessment. These activities are determined on an as-needed basis.</p>	<ul style="list-style-type: none"> ▪ Varies

6.9 Parks and Recreational Facilities Element

6.9.1 Background

Parks and Recreational Facilities enhance the quality of life in San Diego County by providing open space and recreational opportunities for residents and visitors. The Department of Parks and Recreation (DPR) manages many park locations totaling over 40,000 acres. A comprehensive program of maintenance, acquisition, and development of recreation facilities includes local and regional parks, fishing lakes, community centers, special use facilities, ecological preserves, and open spaces. Facilities are open year-round and are operated and maintained by County staff, volunteers, and service contracts.

6.9.2 Source Characterization

6.9.2.1 Facilities Inventory⁸

DPR crews oversee the operation and maintenance of open space parks, regional parks, local parks, sport parks, community centers, historical sites, and operation centers. Attachment 6.1.6 provides an updated, prioritized, watershed-based inventory of all of the Parks and Recreational facilities owned or operated by the County. Table 6.26 provides a description of each facility type. Figure 6.14 shows the geographical distribution of these facilities.

Table 6.26: Overview of the County's Parks and Recreational Facilities

Type of Property	Description
Open Space Parks	Open space parks are areas generally free from development or developed with low intensity uses that respect natural environmental characteristics. Open Space Parks preserve natural resources and allow passive outdoor recreation and scenic enjoyment.
Regional Parks	Regional Parks are typically larger park facilities that can accommodate multiple uses or activities. These parks serve a population within a five-mile radius or greater.
Local Parks	Local Parks are typically smaller park facilities that serve a population within a 1-mile radius.
Sports Parks	These park lands commonly include sport fields, courts, and/or tracks.
Community Centers	Community centers are facilities that meet the recreational, educational, and social needs of the local residents by offering services such as classes, events, and recreational activities.

⁸ Facility inventories are updated annually in the County's JURMP Annual Report.

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Historic Sites	Buildings and property with historical significance have been preserved in the County as Historical Sites. Historical sites offer the public recreational and educational opportunities through exhibits, collections, demonstrations, and activities.
Operations Centers	These facilities act as a base of operations for DPR personnel and provide storage for equipment and materials.

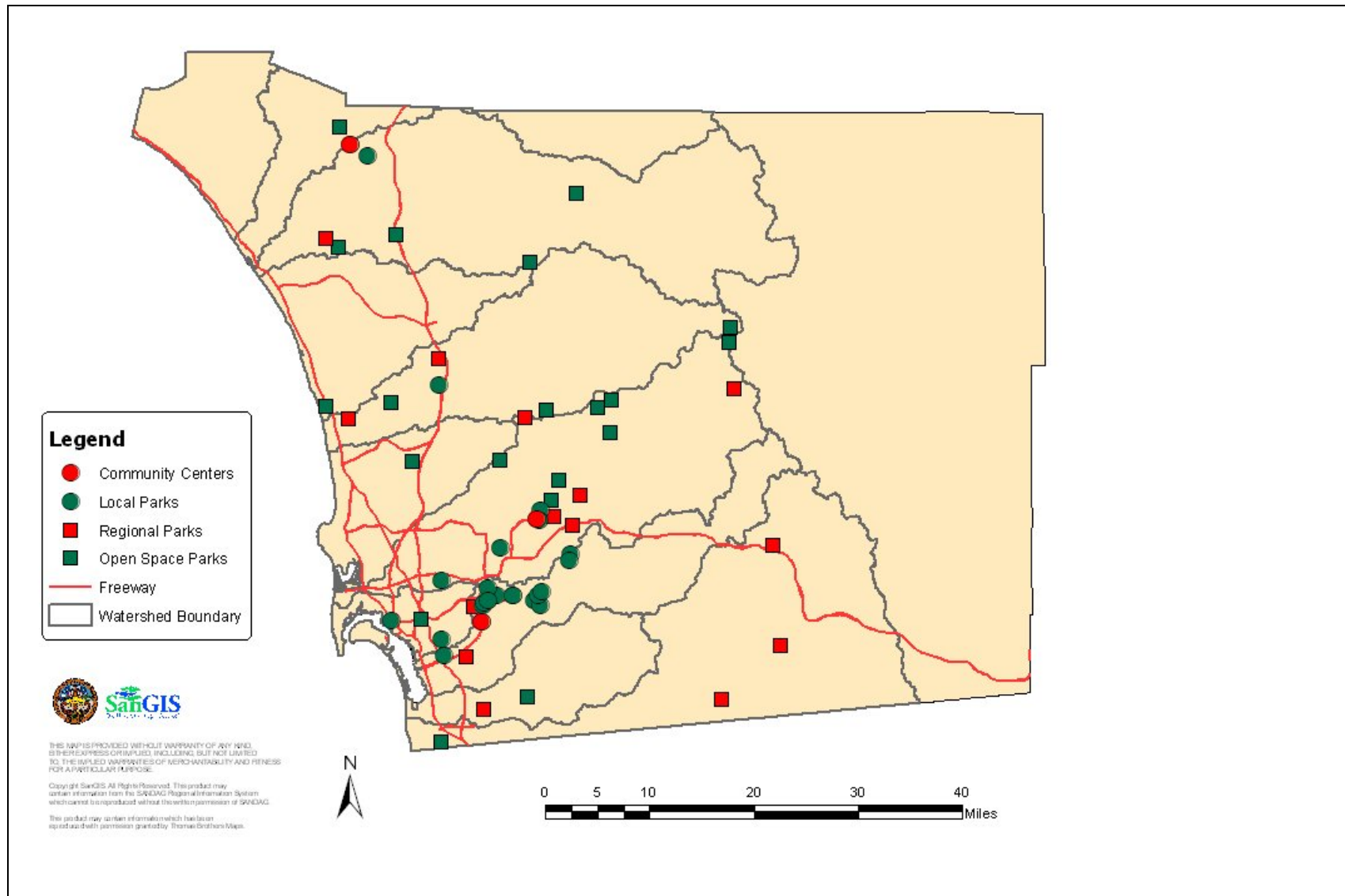


Figure 6.14: Parks and Recreational Facilities in the Unincorporated County

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6.9.2.2 Activities and Pollutants

Table 6.27 provides a comprehensive listing of the Pollutant-Generating Activities (PGAs) potentially associated with the operation of each major category of Parks and Recreational facilities, and indicates the Pollutants-of-Concern (POCs) typically associated with them. Specific PGAs and POCs associated with individual facilities vary depending on their actual uses and operations, and may therefore differ from those presented. Descriptions of PGAs applicable to these and other municipal operations and activities are provided in Attachment 6.2.

Table 6.27: PGAs and POCs for Parks.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading	X	X	X			X	X	
A.1.b	Storage of Materials	X	X		X		X	X	X
A.1.c	Liquid Container Storage				X		X	X	
A.2	WASTE HANDLING AND STORAGE								
A.2.a	Hazardous Waste				X		X	X	X
A.2.b	Solid Waste		X	X	X	X		X	
A.2.c	Food Grease and Oil					X	X		
A.2.d	Pet Waste / Manure		X			X			
A.2.e	Liquid Waste						X	X	
A.2.f	Sanitary Wastes		X	X		X			
A.2.g	Green Waste	X	X	X		X			X
A.2.h	Recyclables / Reusables			X	X		X	X	
Category B: Vehicle and Equipment Activities									
B.1	VEHICLE AND EQUIPMENT STORAGE								
B.1.a	Outdoor Vehicle Storage	X			X		X	X	
B.1.b	Outdoor Equipment & Parts Storage	X			X		X	X	
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.a	Vehicle & Equipment Repair				X		X	X	
B.2.b	Changing Vehicle Fluids				X		X	X	

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PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
B.2.c	Vehicle & Equipment Fueling						X	X	
B.2.e	Equipment Cleaning	X	X		X		X	X	
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.a	Parking Areas	X		X	X		X	X	
C.1.b	Landscaping Activities	X	X	X		X			X
C.1.c	Pesticide, Herbicide, Fertilizer Application		X		X				X
C.1.e	Rooftop & Downspout Maintenance	X		X	X		X		
C.1.f	Sidewalks	X		X					
C.1.g	Break Areas & Public Areas			X		X			
C.1.h	Pressure Washing	X			X		X		
C.1.j	Erodible Surfaces	X							
C.1.k	Earth Moving Activities & Areas Under Construction	X		X			X		
C.3	STORM DRAIN SYSTEMS								
C.3a	Storm Drain Operation & Maintenance	X	X	X	X		X	X	X
C.3.b	Treatment Control BMP Maintenance	X		X	X		X	X	
C.3.c	Illicit Discharges & Connections	X	X	X	X	X	X	X	X
Category D: Specific Operations and Activities									
D.10	Dust & Particulate-Generating Activities	X							
D.15	Floors, Mats, & Surface Cleaning	X			X	X	X	X	
D.16	Food Preparation			X		X	X		
D.21	Painting or Coating Activities				X			X	
D.24	Recreational Uses	X		X	X	X	X		
D.26	Special Events	X	X	X	X	X	X	X	
D.29	Weed Abatement & Vegetation Clearing	X	X	X		X			X
D.30	Welding				X				

6.9.3 Best Management Practice Requirements

Parks and Recreational facilities must meet the applicable requirements set out in Watershed Protection Ordinance (WPO) sections 67.801 through 67.806, sections 67.808 through 67.810, and

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section 67.813. Per WPO section 67.809(a), municipal facilities must meet the BMP standards established by the County for equivalent operations conducted at commercial and industrial businesses. The use of pollution prevention (P2) practices is always encouraged where practicable. P2 practices that are generally recognized as being effective and economically advantageous at Parks and Recreational facilities should be implemented.

Specific BMP requirements are determined on a site-by-site basis in each Facility's Pollution Prevention Plan (F3P) to address the pollutant generating activities applicable to the facility. BMPs are implemented by DPR management and staff. BMP requirements are reviewed annually and updated as necessary.

6.9.4 Program Implementation

Figure 6.15 shows the organizational relationship of staff with primary responsibility for administering and implementing the Parks and Recreational Facilities element. Key roles and responsibilities are also summarized in Table 6.28.

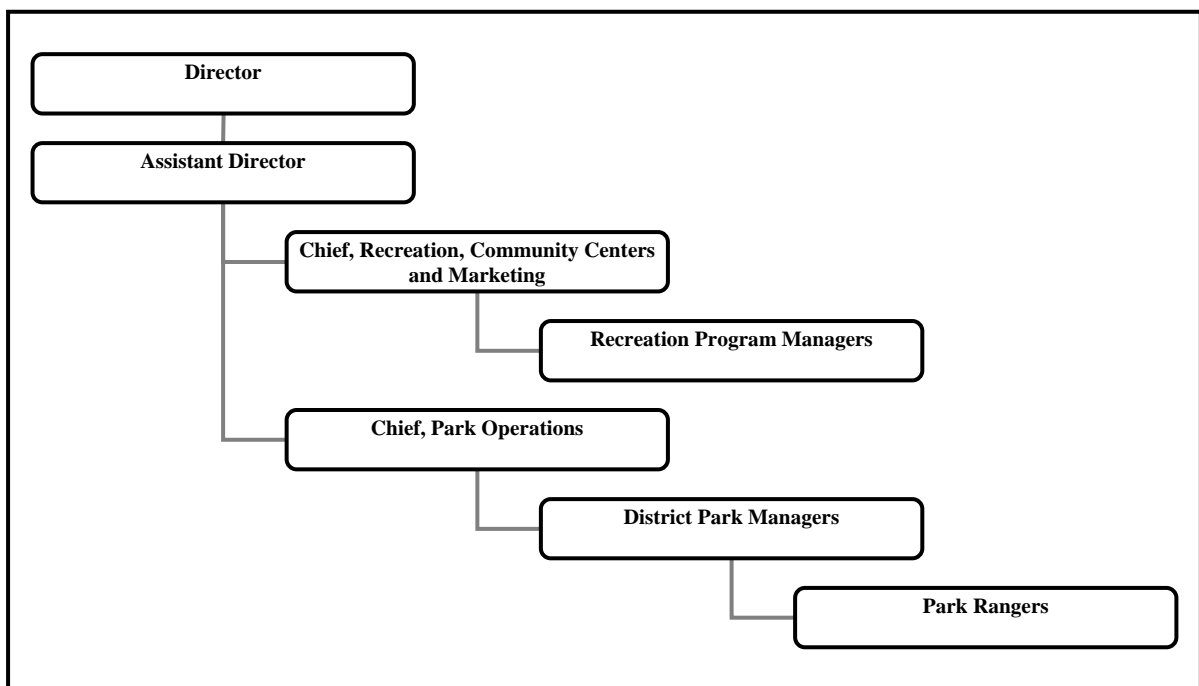


Figure 6.15: DPR Organizational Structure for the Parks and Recreational Facilities Element

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Table 6.28: DPR Implementation Roles and Responsibilities for Parks and Recreation

Program Activity	Responsible Staff
Administrative Activities	
<u>Annual Program Reviews:</u> To ensure continued compliance with the Permit and implementation plans, program managers annually review applicable facilities inventories, BMP requirements, policies and procedures, and implementation strategies.	<ul style="list-style-type: none"> ▪ Chief, Recreation, Community Centers ▪ Chief, Park Operations ▪ Recreation Program Managers ▪ District Park Managers
<u>Annual Facility Pollution Prevention Plan (F3P) Reviews:</u> F3Ps are required for all high priority facilities. Each F3P describes the facility location, identifies and describes on-site PGAs, describes BMP requirements, and identifies implementation roles and responsibilities. F3Ps are reviewed annually and updated as needed.	<ul style="list-style-type: none"> ▪ Recreation Program Managers ▪ District Park Managers ▪ Supervising Rangers ▪ Senior Park Rangers
<u>Contract Administration:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Recreation Program Managers ▪ District Park Managers
<u>Staff and Contractor Training:</u> DPR staff and contractors with urban runoff management responsibilities with urban runoff management responsibilities must receive training in accordance with the minimum standards set out in Section 10.2. Contractor training may either be provided by County staff or required as a contract condition.	<ul style="list-style-type: none"> ▪ District Park Managers ▪ Contractors ▪ Park Rangers ▪ Park Attendants ▪ Park Maintenance Workers
BMP Implementation	
<u>F3P/ BMP Implementation:</u> BMPs are implemented by DPR staff and contractors as needed to address the specific activities (paving a trail, painting a building, etc.) and pollutants identified for each site or facility. Minimum BMP requirements and options are provided in each facility's F3P.	<ul style="list-style-type: none"> ▪ Park Rangers ▪ Contractors ▪ Park Attendants ▪ Park Maintenance Workers
<u>Contract Work:</u> DPR through the County's Purchasing and Contracting Department has incorporated legal language in its contracts to notify consultants and contractors about their obligations regarding stormwater regulations. Contracts for work (construction, maintenance, repair, or other work with the potential to release pollutants to the MS4) include provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Contractors
Compliance Verification	

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Program Activity	Responsible Staff
<u>Compliance Documentation and Reporting</u> : All staff is responsible for ensuring adequate documentation of urban runoff within their areas of defined responsibility.	<ul style="list-style-type: none"> ▪ All staff
<u>Facility Self-Inspection</u> : Quarterly facility inspections are conducted to assess compliance with urban runoff management requirements. These typically consist of observations and records reviews.	<ul style="list-style-type: none"> ▪ District Park Managers ▪ Recreation Program Managers ▪ Park Rangers ▪ Park Attendants ▪ Park Maintenance Workers
<u>Facility Auditing</u> : Auditing of Parks and Recreational Facilities is conducted by the DPW WPP Audits Group. Auditing schedules and frequencies are determined based on TTWQ and compliance history.	<ul style="list-style-type: none"> ▪ DPW WPP Auditors
<u>Special Investigations</u> : Special studies and investigations are occasionally needed to gather data and information necessary for program planning or assessment. These activities are determined on an as-needed basis.	<ul style="list-style-type: none"> ▪ Varies

6.10 Office Buildings and Other Municipal Facilities Element

6.10.1 Background

The County owns and operates a variety of offices buildings and other municipal facilities throughout the San Diego Region. As part of the County's municipal obligation, these facilities are inspected and monitored internally. Due to the general nature of these offices and facilities many are inspected and maintained by the County Department of General Services (DGS). While DGS monitors and inspects a majority of these facilities, other County departments such as DEH, Health and Human Services Agency (HHSA), DPW, AWM, Clerk of the Board (COB), Probation (DOP), Sheriff, and the Controller and Assessors Office are obligated to meet stormwater standards for the activities they perform in respect to the facilities they occupy or use.

6.10.2 Source Characterization

6.10.2.1 Facilities Inventory ⁹

The County operates a large inventory of office buildings and other municipal facilities. “Other municipal facilities” include all remaining miscellaneous facilities that are not easily categorized. Many of these facilities are occupied by a variety of County departments, but are maintained by DGS. Attachments 6.1.1-6.1.7 provides an updated prioritized, watershed-based inventory of facilities that have the potential to affect the MS4 and receiving waters. Table 6.29 provides a description of each facility Type.

Table 6.29: Overview of Office Buildings & Municipal Facilities

Type of Property	Description
Agriculture Weights and Measures Facilities	The Department of Agriculture weights and Measures operates an Insectory Museum located in Chula Vista. Operations at the facility include maintaining the Insectory Museum as well as areas for AWM staff to park vehicles and store chemicals.
Animal Shelters	Animal shelters are operated by County Animal Control. These facilities house animals and act as operational centers for Animal Control personnel.
Courthouses	Courthouses are operated by a multitude of County and State employees that provide legal services and civil protection.
Detention Facilities	Facilities operated by the County of San Diego Probation or Sheriff Department that house those suspected of a crime and/or provide monitoring and outreach for offenders.
Libraries	Facilities primarily operated by the County Library Department, who distribute

⁹ Facility inventories are updated annually in the County's JURMP Annual Report.

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Type of Property	Description
	books and other media information.
General Offices	Office buildings where County workers perform work tasks, documentation, etc.
Household Hazardous Waste (HHW) Collection Facilities	DEH Community Health Division oversees collection facilities providing services for approximately 160,000 households in the unincorporated County. The facilities provide residents with a responsible way to dispose or recycle their HHW. HHW collection occurs outdoors, however HHW is stored in containers under cover.
HHSFA Facilities	Facilities operated by the Health and Human Service Agency, which include health centers, family resource centers, children housing centers, psychiatric hospitals, senior citizen assistance centers, drug rehabilitation assistance centers, and other health related facilities. Some of these facilities act as housing for their clients.
Regional Operations Centers	Regional and operations centers usually contain various County departmental offices and/or operations within a business park like setting. Many of the activities that occur at these facilities are common, which make it difficult to assign responsibilities to individual departments.
Sheriff's Facilities	Facilities operated by the County of San Diego Sheriff's department which include communication centers, crime labs, stations and substations used to store sheriff equipment and offices for personnel.

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6.10.2.2 Activities and Pollutants

Table 6.30 lists the Pollutant-Generating Activities (PGAs) potentially associated with the operation of each major category of office buildings and other municipal facilities and indicates the Pollutants-of-Concern (POCs) typically associated with them. Specific PGAs and POCs associated with individual facilities vary depending on their actual uses and operations, and may therefore differ from those presented. Attachment 6.2 presents and describes a comprehensive listing of PGAs applicable to municipal operations and activities.

Table 6.30: PGAs and POCs for Buildings and Other Facilities.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading	X		X	X		X	X	
A.1.b	Storage of Materials	X			X		X	X	
A.1.c	Liquid Container Storage				X		X	X	
A.2	WASTE HANDLING AND STORAGE								
A.2.a	Hazardous Waste				X	X	X	X	
A.2.b	Solid Waste			X	X	X			
A.2.c	Food Grease and Oil					X	X		
A.2.d	Pet Waste / Manure		X			X			
A.2.e	Liquid Waste					X	X	X	
A.2.f	Sanitary Wastes		X	X		X		X	
A.2.g	Green Waste	X	X	X		X			X
A.2.h	Recyclables / Reusables			X	X		X	X	
Category B: Vehicle and Equipment Activities									
B.1	VEHICLE AND EQUIPMENT STORAGE								
B.1.a	Outdoor Vehicle Storage	X			X		X	X	
B.1.b	Outdoor Equipment & Parts Storage				X		X		
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.a	Vehicle & Equipment Repair			X	X		X	X	
B.2.c	Vehicle & Equipment Fueling						X	X	

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PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
B.2.d	Vehicle Washing	X			X		X	X	
B.2.e	Equipment Cleaning	X	X		X		X	X	X
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.a	Parking Areas	X		X	X		X	X	
C.1.b	Landscaping Activities	X	X	X		X			X
C.1.c	Pesticide, Herbicide, & Fertilizer Application		X		X				X
C.1.d	Pool, Spa, & Fountain Maintenance	X	X			X		X	
C.1.e	Rooftop & Downspout Maintenance	X		X	X		X		
C.1.f	Sidewalks	X		X					
C.1.g	Break Areas & Public Areas			X		X			
C.1.h	Pressure Washing	X			X		X		
C.1.i	Fire Sprinkler Testing & Maintenance				X	X			
C.1.j	Erodible Surfaces	X							
C.1.k	Earth Moving Activities & Areas Under Construction	X		X			X		
C.3	STORM DRAIN SYSTEMS								
C.3a	Storm Drain Operation & Maintenance	X	X	X	X		X	X	X
C.3.b	Treatment Control BMP Maintenance	X		X	X		X	X	
C.3.c	Illicit Discharges & Connections	X	X	X	X	X	X	X	X
Category D: Specific Operations and Activities									
D.2	Animal Grooming & Washing	X				X		X	
D.8	Cutting, Trimming, or Grinding				X				
D.10	Dust & Particulate-Generating Activities	X							
D.15	Floors, Mats, & Surface Cleaning	X				X	X	X	
D.16	Food Preparation			X		X	X		
D.20	Mixing				X			X	
D.21	Painting or Coating Activities			X	X			X	
D.26	Special Events	X	X	X	X	X	X	X	
D.29	Weed Abatement & Vegetation Clearing	X		X					X
D.30	Welding				X				

6.10.3 Best Management Practice Requirements

Office buildings and other municipal facilities must meet the applicable requirements set out in Watershed Protection Ordinance (WPO) sections 67.801 through 67.806, sections 67.808 through 67.810, and section 67.813. Per WPO section 67.809(a), municipal facilities must meet the BMP standards established by the County for equivalent operations conducted at commercial and industrial businesses. The use of pollution prevention (P2) practices is always encouraged where practicable. P2 practices that are generally recognized as being effective and economically advantageous at offices buildings and other municipal facilities should be implemented.

Specific BMP requirements are determined on a site-by-site basis in each Facility's Pollution Prevention Plan (F3P) to address the pollutant generating activities applicable to the facility. BMPs are implemented by DGS or other assigned county staff. BMP requirements are reviewed annually and updated as necessary.

6.10.4 Program Implementation

Table 6.31 summarizes key roles and responsibilities in implementing this element.

Table 6.31: Implementation Roles and Responsibilities for Other Municipal Facilities

Program Activity	Responsible Staff
Administrative Activities	
<u>Annual Program Reviews:</u> To ensure continued compliance with the Permit and implementation plans, program managers annually review applicable facilities inventories, BMP requirements, policies and procedures, and implementation strategies.	<ul style="list-style-type: none"> ▪ DGS Facility Analyst ▪ DGS Facility Support Managers ▪ DGS Project Manager/Coordinator ▪ Other Dept. Management
<u>Annual Facility Pollution Prevention Plan (F3P) Reviews:</u> F3Ps are required for all high priority facilities. Each F3P describes the facility location, identifies and describes on-site PGAs, describes BMP requirements, and identifies implementation roles and responsibilities. F3Ps are reviewed annually and updated as needed.	<ul style="list-style-type: none"> ▪ DGS Facility Analyst ▪ DGS Facility Support Managers ▪ DGS Project Manager/Coordinator ▪ Other Facility staff
<u>Contract Administration:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ DGS Facility Contract Manager ▪ DGS Safety Coordinator ▪ DGS Facility Analyst ▪ Other Dept. Management

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Program Activity	Responsible Staff
<u>Staff and Contractor Training:</u> DGS - offices buildings and other municipal facilities staff and contractors with urban runoff management responsibilities with urban runoff management responsibilities must receive training in accordance with the minimum standards set out in Section 10.2. Contractor training may either be provided by County staff or required as a contract condition.	<ul style="list-style-type: none"> ▪ DGS Facility Contract Manager ▪ DGS Safety Coordinator ▪ DGS Facility Analyst ▪ Dept. Training Coordinators
BMP Implementation	
<u>F3P/ BMP Implementation:</u> BMPs are implemented by DGS - offices buildings and other municipal facilities staff and contractors as needed to address the specific activities (paving a trail, painting a building, etc.) and pollutants identified for each site or facility. Minimum BMP requirements and options are provided in each facility's F3P.	<ul style="list-style-type: none"> ▪ DGS Facility Support Managers ▪ Other Facility Staff ▪ Building Maintenance Supervisors
<u>Contract Work:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Contractors
Compliance Verification	
<u>Compliance Documentation and Reporting:</u> All staff is responsible for ensuring adequate documentation of urban runoff within their areas of defined responsibility.	<ul style="list-style-type: none"> ▪ DGS Facility Analyst ▪ DGS Facility Support Managers ▪ Building Maintenance Supervisors ▪ Other Facility Staff
<u>Facility Self-Inspection:</u> Quarterly facility inspections are conducted to assess compliance with urban runoff management requirements. These typically consist of observations and records reviews.	<ul style="list-style-type: none"> ▪ DGS Facility Analyst ▪ DGS Facility Support Managers ▪ Building Maintenance Supervisors ▪ Other Facility Staff
<u>Facility Auditing:</u> Auditing of offices buildings and other municipal facilities is conducted by the DPW WPP Audits Group. Auditing schedules and frequencies are determined based on TTWQ and compliance history.	<ul style="list-style-type: none"> ▪ DPW WPP Auditors
<u>Special Investigations:</u> Special studies and investigations are occasionally needed to gather data and information necessary for program planning or assessment. These activities are determined on an as-needed basis.	<ul style="list-style-type: none"> ▪ Varies

6.11 Pesticides, Herbicides and Fertilizer Management Element

6.11.1 Background

The department of AWM has certified applicators that provide support and oversee the proper use of pesticides, herbicides, and fertilizers along County paved and unpaved roads, excess right of ways, grounds landscaping, etc.

The County of San Diego also employs Integrated Pest Management (IPM) methodology. All available techniques are used to reduce pest populations to acceptable levels while minimizing the potential impact of pesticides and herbicides upon humans and the environment.

The management of pesticides, herbicides and fertilizers in parks as well as all other county owned open spaces are the responsibility of the respective department. The Department of Parks and Recreation has certified applicators within their personnel and other departments such as General Services have certified contractors that provide the service on behalf of the County.

6.11.2 Source Characterization

6.11.2.1 Pesticide, Herbicide and Fertilizer Application

All pesticide, herbicide, and fertilizer applications conducted by county staff will be performed consistent with the laws and regulations set forth in the California Food and Agricultural Code, the California Code of Regulations, and the State General Permit for aquatic pesticide application to waters of the United States. Environmental and atmospheric conditions will be considered prior to a pesticide application. Pesticide applications will be monitored through inspections conducted by the County Department of Agriculture's Pesticide Regulatory Program (PRP). Required permits for the application of Restricted Use Pesticides are obtained through the PRP program that conducts an assessment of environmental factors as part of the permitting process.

Pesticide applicators employed by the County are required to obtain and maintain Qualified Applicator Certification (QAC) in categories consistent with the scope of pesticides applications they perform. Certification is obtained through the California Department of Pesticide Regulation and maintenance of certification includes fulfillment of continuing education credit requirements.

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6.11.2.2 Activities and Pollutants

Table 6.32 provides a comprehensive listing of the PGAs potentially associated with the application of pesticides, herbicides, and fertilizers and indicates the POCs typically associated with them. Specific PGAs and POCs associated with individual facilities vary depending on their actual uses and operations, and may therefore differ from those presented. Descriptions of PGAs applicable to these and other municipal operations and activities are provided in Attachment 6.2.

Table 6.32: PGAs and POCs for Pesticide, Herbicide, and Fertilizer Application.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading		X					X	X
A.1.b	Storage of Materials		X					X	X
A.2	WASTE HANDLING AND STORAGE								
A.2.a	Hazardous Waste						X	X	X
A.2.b	Solid Waste	X	X	X				X	X
A.2.g	Green Waste		X	X		X		X	X
A.2.h	Recyclables / Reusables			X	X				
Category B: Vehicle and Equipment Activities									
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.e	Equipment Cleaning	X	X		X		X	X	X
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.b	Landscaping Activities	X	X	X					
C.1.c	Pesticide, Herbicide, and Fertilizer Application		X						X
Category D: Specific Operations and Activities									
D.6	Chemical Treatment		X					X	X
D.15	Floors, Mats, and Surface Cleaning	X	X		X	X		X	X
D.20	Mixing		X					X	X
D.22	Pesticide or Other Chemical Product Formulation		X					X	X
D.29	Weed Abatement and Vegetation Clearing	X							X

6.11.3 Best Management Practice Requirements

Pesticide-application BMPs include the following:

- Use Integrated Pest Management (IPM) to avoid runoff or leaching from excess chemical applications.
- Track pesticide applications by maintaining a pesticide application record.
- If rain or excessive wind is in the forecast, pesticide applications should be re-scheduled to avoid unnecessary runoff.
- Storm drains in the immediate vicinity of pesticide application must be covered during treatment.
- Fill tanks on a gravel surface, away from storm drains, sewers or ditches.

Pesticide, herbicide and fertilizer management 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. Per WPO section 67.809(a), municipal facilities must meet the BMP standards established by the County for equivalent operations conducted at commercial and industrial businesses. The use of P2 practices is always encouraged where practicable. P2 practices that are generally recognized as being effective and economically advantageous for pesticides, herbicides, and fertilizer management, should be implemented.

BMP requirements are reviewed annually and updated as necessary.

6.11.4 Program Implementation

Figure 6.16 shows the organizational flow chart for Agriculture Weights and Measures (AWM) staff with primary responsibility for administering and implementing the Pesticides, herbicides, and fertilizer management element. Key roles and responsibilities are also summarized in Table 6.33.

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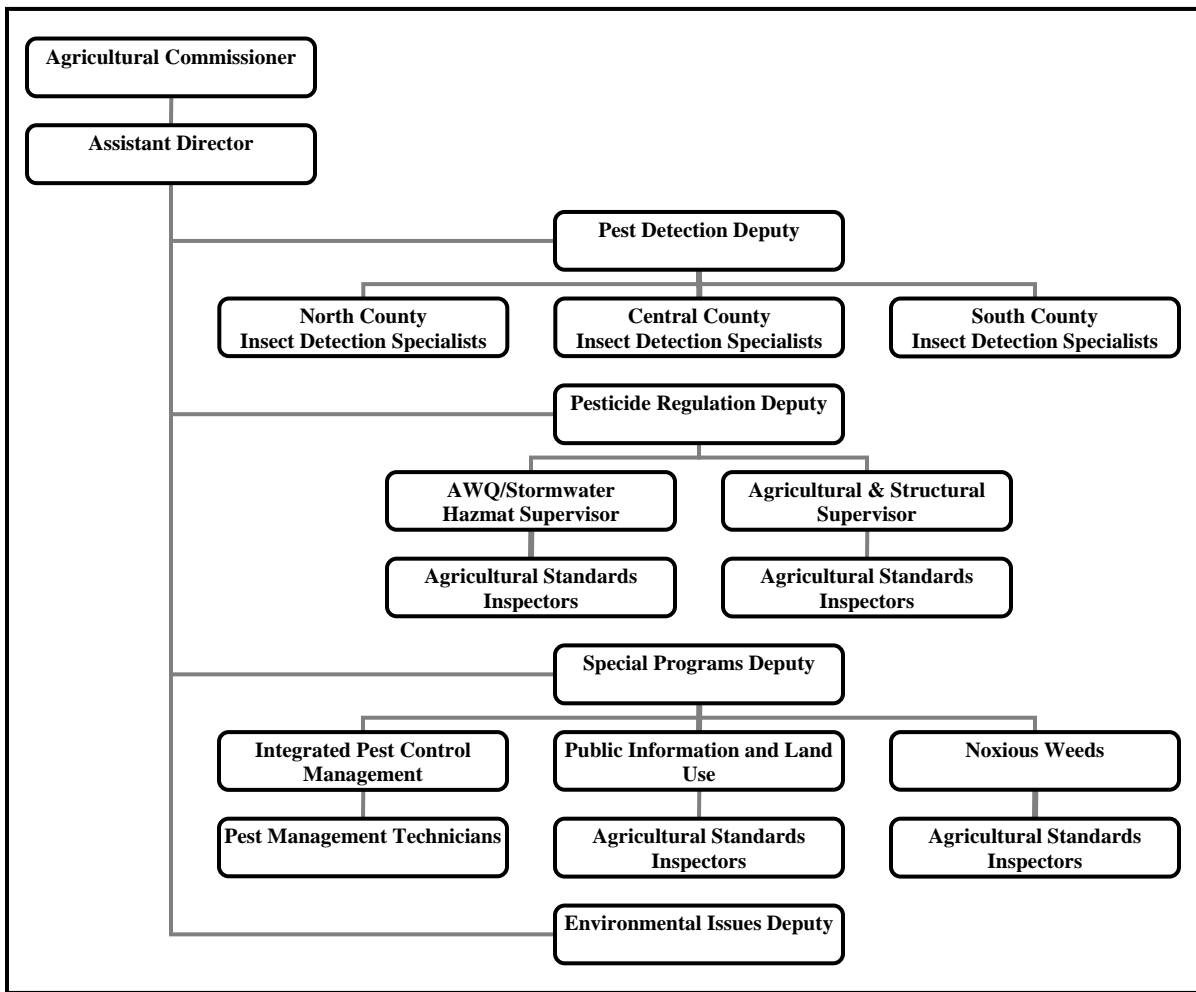


Figure 6.16: AWM Organizational Structure for the Pesticides, Herbicides, and Fertilizer Element

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Table 6.33: AWM Implementation Roles and Responsibilities for the Pesticides, Herbicides, and Fertilizer Element

Program Activity	Responsible Staff
Administrative Activities	
<u>Annual Program Reviews:</u> To ensure continued compliance with the Permit and implementation plans, program managers annually review applicable facilities inventories, BMP requirements, policies and procedures, and implementation strategies.	<ul style="list-style-type: none"> ▪ Agricultural Commissioner ▪ Assistant Director ▪ Pest Detection Deputy ▪ Pesticide Regulation Deputy ▪ Special Programs Deputy ▪ Environmental Issues Deputy
<u>Annual Stormwater Pollution Prevention Plan (SWPPP) Reviews:</u> An SWPPP is required for all high priority facilities. The SWPPP describes the facility location, identifies and describes on-site PGAs, describes BMP requirements, and identifies implementation roles and responsibilities. The SWPPP is reviewed annually and updated as needed.	<ul style="list-style-type: none"> ▪ DGS Facility Analyst ▪ DGS Facility Support Managers ▪ DGS Project Manager/Coordinator
<u>Contract Administration:</u> For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.	<ul style="list-style-type: none"> ▪ Pesticide Regulation Deputy ▪ Special Programs Deputy ▪ Environmental Issues Deputy
<u>Staff and Contractor Training:</u> AWM staff and contractors with urban runoff management responsibilities with urban runoff management responsibilities must receive training in accordance with the minimum standards set out in Section 10.2. Contractor training may either be provided by County staff or required as a contract condition.	<ul style="list-style-type: none"> ▪ Pest Detection Deputy ▪ Pesticide Regulation Deputy ▪ Special Programs Deputy ▪ AWQ/Stormwater Hazmat Supervisor ▪ Agricultural & Structural Supervisor
BMP Implementation	
<u>F3P/ BMP Implementation:</u> BMPs are implemented by AWM staff and contractors as needed to address the specific activities (paving a trail, painting a building, etc.) and pollutants identified for each site or facility.	<ul style="list-style-type: none"> ▪ Insect Detection Specialists ▪ Agricultural Standards Inspectors ▪ Pest Management Technicians

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Program Activity	Responsible Staff
<p><u>Contract Work</u>: For any construction, maintenance, repair, or other work with the potential to release pollutants to the MS4, contracts should include applicable provisions to prohibit releases and ensure BMP implementation. Regardless of the likelihood of discharging pollutants, contractors are responsible for meeting all applicable stormwater requirements.</p>	<ul style="list-style-type: none"> ▪ Contractors
Compliance Verification	
<p><u>Compliance Documentation and Reporting</u>: All staff is responsible for ensuring adequate documentation of urban runoff within their areas of defined responsibility.</p>	<ul style="list-style-type: none"> ▪ Insect Detection Specialists ▪ Agricultural Standards Inspectors ▪ Pest Management Technicians
<p><u>Facility Self-Inspection</u>: Quarterly facility inspections are conducted to assess compliance with urban runoff management requirements. These typically consist of observations and records reviews.</p>	<ul style="list-style-type: none"> ▪ DGS Facility Analyst ▪ DGS Facility Support Managers ▪ Building Maintenance Supervisors
<p><u>Special Investigations</u>: Special studies and investigations are occasionally needed to gather data and information necessary for program planning or assessment. These activities are determined on an as-needed basis.</p>	<ul style="list-style-type: none"> ▪ Varies

6.12 Non Emergency Fire Fighting and Related Activities Element

6.12.1 Background

The mission of the Fire Services Division of the Department of Planning and Land Use (DPLU) is to implement the building and fire codes in the unincorporated portions of the county and to assist fire protection agencies with equipment, training and apparatus in the protection of life, property and the environment. The County of San Diego is unique within the State of California in having 16 fire protection districts within its boundaries. Responsibility for the prevention and suppression of fire and emergency services in the unincorporated County is vested in a number of local, federal, state, and volunteer agencies. Generally, each local agency is responsible for structural fire protection and emergency medical response within their area of responsibility. Wildland fires are the responsibility of the State (CAL FIRE) on state and private lands and the federal government (Forest Service, etc.) on federally owned lands. However, mutual and automatic aid agreements enable non-lead fire agencies to respond to fire emergencies outside their district boundaries¹⁰. Since most fire fighters are Emergency Medical Technician (EMT) certified, the County generally relies on fire departments, local districts and service areas to provide first responder medical service in the unincorporated County. Advanced life support and basic life support ambulance services are provided by various public and private agencies.

6.12.2 Source Characterization

6.12.2.1 Facility Inventory¹¹

In the unincorporated areas of San Diego County, fire and emergency services outside of state and federally owned lands are provided by sixteen fire protection districts, seven County Service Areas, five Municipal Water Districts and several volunteer fire companies (see Table 6.34). Reservation fire departments also provide mutual fire service assistance to unincorporated County areas that are near or bordering tribal lands. Fire and municipal water districts are also responsible for the enforcement of fire regulations as they relate to planning, construction and development.

The California Department of Forestry and Fire Protection (CAL FIRE) provides wildland fire protection services for state owned and private lands outside of incorporated cities and designated by the State as State Responsibility Areas (SRA). CAL FIRE operates eighteen fire stations and one Air Attack Base. Stations are open year-round with winter staffing funded by the state for ten stations and the County for eight stations. Additional engines are funded by the state during the

¹⁰ In San Diego County, each fire protection agency is signatory to the State Master Mutual Aid Agreement, which enables non-lead agencies to respond to a fire emergency if requested. Independent fire districts may also choose to participate in automatic aid agreements, intended to have the closest fire station respond at the time of the call.

¹¹ Inventory numbers are from the time of original JURMP submittal: March 24, 2008. Facility inventories are updated annually in the County's JURMP Annual Report.

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fire season (normally May through November). They respond to structural and vehicular fires and medical emergencies as well as wildland fires. CAL FIRE provides structural fire protection services under contract to some local agencies.

The United States Forest Service (USFS) is responsible for fire protection, prevention and land management on federal lands within the boundaries of the Cleveland National Forest. USFS operates a total of thirteen wildland fire stations in San Diego County. The United States Fish and Wildlife Service (FWS) is responsible for fire protection, prevention and land management on federal preserve lands. FWS operates one wildland fire station in San Diego County. The Bureau of Land Management contracts with CAL FIRE for suppression of fires on BLM land. Private land within or adjacent to federal land may be protected by the federal agencies under an agreement with CAL FIRE.

Table 6.34: Fire Protection Organizations in Unincorporated San Diego County¹² (as of March 2008)

District	Services
Fire Protection Districts	
Alpine	▪ Fire protection, rescue, emergency medical, fire prevention
Bonita-Sunnyside	▪ Fire protection, rescue, emergency medical, fire prevention
Borrego Springs	▪ Fire protection, rescue, emergency medical, fire prevention, Local Responsibility Area (LRA) wildland
Deer Springs	▪ Fire protection, rescue, emergency medical, fire prevention
East County	▪ Fire protection, rescue, emergency medical, fire prevention
Julian-Cuyamaca	▪ Fire protection, rescue, emergency medical, fire prevention
Lakeside	▪ Fire protection, rescue, emergency medical, fire prevention
Lower Sweetwater	▪ Fire protection, rescue, emergency medical, fire prevention
North County	▪ Fire protection, rescue, emergency medical, fire prevention, LRA wildland
Pine Valley	▪ Fire protection, rescue, emergency medical, fire prevention
Rancho Santa Fe	▪ Fire protection, rescue, emergency medical, fire prevention
San Diego Rural	▪ Fire protection, rescue, emergency medical, fire prevention
San Marcos	▪ Fire protection, rescue, emergency medical, fire prevention
San Miguel	▪ Fire protection, rescue, emergency medical, fire prevention

¹² All provide fire protection, rescue, and emergency medical response. Fire protection districts provide fire prevention services. The County provides fire prevention services for the unincorporated portions of the county outside of fire protection districts. This table does not include the 18 CDF or 12 USFWS operated Fire Departments.

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District	Services
Valley Center	▪ Fire protection, rescue, emergency medical, fire prevention
Vista	▪ Fire protection, rescue, emergency medical, fire prevention
Municipal Water Districts¹³	
Mootamai	▪ Fire protection, rescue, emergency medical, fire prevention
Pauma	▪ Fire protection, rescue, emergency medical, fire prevention
Ramona	▪ Fire protection, rescue, emergency medical, fire prevention, LRA wildland
Rincon Del Diablo	▪ Fire protection, rescue, emergency medical, fire prevention
Yuima	▪ Fire protection, rescue, emergency medical, fire prevention
County Service Areas⁵	
Elfin Forest/Harmony Grove	▪ Fire protection, rescue, emergency medical
Mt. Laguna	▪ Fire protection, rescue, emergency medical
Palomar Mountain	▪ Fire protection, rescue, emergency medical
Boulevard	▪ Fire protection, rescue, emergency medical
Campo	▪ Fire protection, rescue, emergency medical
San Pasqual	▪ Fire protection, rescue, emergency medical
Pepper Drive	▪ Fire protection, rescue, emergency medical

The phrase Fire Departments, as defined by the Consolidated Fire Code, refers to any regularly organized fire department, fire protection district, a legally formed volunteer fire department, or fire company regularly charged with the responsibility of providing fire protection to the jurisdiction. The term emergency, describes a situation that, in the opinion of the incident commander, is declared to be an emergency, and exists from the receipt of an alarm notification until the emergency has concluded and equipment is returned to service.

Fire fighting flows originating during emergency operations are exempted from discharge requirements as articulated by the Permit. However, other discharges related to fire agency activities (non-emergency) must be conducted in a manner consistent with stormwater management requirements.

6.12.2.2 Activities and Pollutants

Table 6.35 lists the Pollutant Generating Activities (PGAs) potentially associated with the typical operations and responsibilities of each Fire Department. Specific PGAs occurring at individual facilities vary depending on their actual uses and operations, and may therefore differ from those

¹³ Source: County of San Diego, Consolidated Fire Code November 16, 2001 p.3; LAFCO: Profiles of Special Districts (2000).

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presented. A complete listing of PGAs along with detailed descriptions of each is included in Attachment 6.2

Table 6.35: PGAs and POCs for Non-Emergency Fire Fighting Activities.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading			X			X	X	
A.2	WASTE HANDLING AND STORAGE								
A.2.b	Solid Waste			X	X	X	X	X	
A.2.e	Liquid Waste		X		X			X	
A.2.g	Green Waste	X	X	X	X				X
Category B: Vehicle and Equipment Activities									
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.d	Vehicle Washing	X			X		X	X	
B.2.e	Equipment Cleaning	X			X		X	X	
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.j	Erodible Surfaces	X							
C.3	STORM DRAIN SYSTEMS								
C.3.c	Illicit Discharges & Connections	X	X	X	X	X	X	X	X
Category D: Specific Operations and Activities									
D.7	Control Burns	X	X		X			X	
D.10	Dust & Particulate-Generating Activities	X							
D.12	Firefighting Field Training & Drills	X		X					
D.13	Fire Access Roads / Fire Break Creation and Maintenance	X		X					
D.14	Fire Hydrant, Tank, & Hose Testing & Maintenance	X	X	X				X	

6.12.3 Best Management Practice (BMP) Requirements

The updated WPO, effective April 12, 2008, reflects the new requirements of the January 24, 2007 Permit re-issuance. Fire Departments 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. The use of pollution prevention (P2) practices is always encouraged, and required where applicable and feasible. Specific application of BMPs is determined on a site-by-site basis to address the specific PGAs applicable to each activity. BMP requirements are to be reviewed annually by the Department of Planning and Land Use, Fire Services Division, and updated as necessary.

The WPO requires all Fire Departments to comply with two inter-related sets of directives: (1) compliance with applicable discharge prohibition requirements, and (2) implementation of BMPs to prevent non-stormwater discharges and to reduce contaminants in stormwater discharges. The County will generally consider failure to comply with applicable discharge prohibitions as evidence of inadequate BMPs, staff training, and/or outreach and education. Applicable discharge prohibitions and BMP requirements are further described below.

Table 6.36: Summary of Discharge Prohibitions and BMP Requirements

Activity Type
PART A. Conditionally Exempted discharges which require BMPs to be implemented to the MEP
1. Discharges associated with fire suppression system testing or maintenance
• Hydrant Testing
• Fire Sprinkler Testing or Flushing
• Tank Flushing
2. Discharges Associated with Post-Emergency Fire Fighting Activities
3. Discharges Associated with Fire-related Field Training
PART B. Prohibited discharges which require BMPs to be implemented to the MEP
1. Discharges Associated with Live Fire Training
2. Discharges Associated with Other Emergency Activities (non-life threatening)
• Spill response
• Accident response
• Medical response
3. Discharges Associated with Activities Conducted at Fire Agency Facilities
• Vehicle and equipment washing and cleaning
• Vehicle fueling: mobile and fixed facility
• Vehicle and equipment maintenance and repair
• Facility maintenance: landscape, painting, roof repair, pavement washing, general housekeeping
4. Discharges Associated with Other Related Activities

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Activity Type
<ul style="list-style-type: none"> • Fire lane maintenance and creation
<ul style="list-style-type: none"> • Special events (open house)

6.12.4 Program Implementation

Figure 6.17 shows the organizational flow chart for DPLU staff with primary responsibility for administering and implementing the non-emergency fire fighting element. The County will continue to work with Fire Departments to identify, update, and provide guidance on implementation of the stormwater program. However, the ultimate responsibility for ensuring compliance with stormwater requirements will reside with the individual fire departments. Key roles and responsibilities are also summarized in Table 6.37.

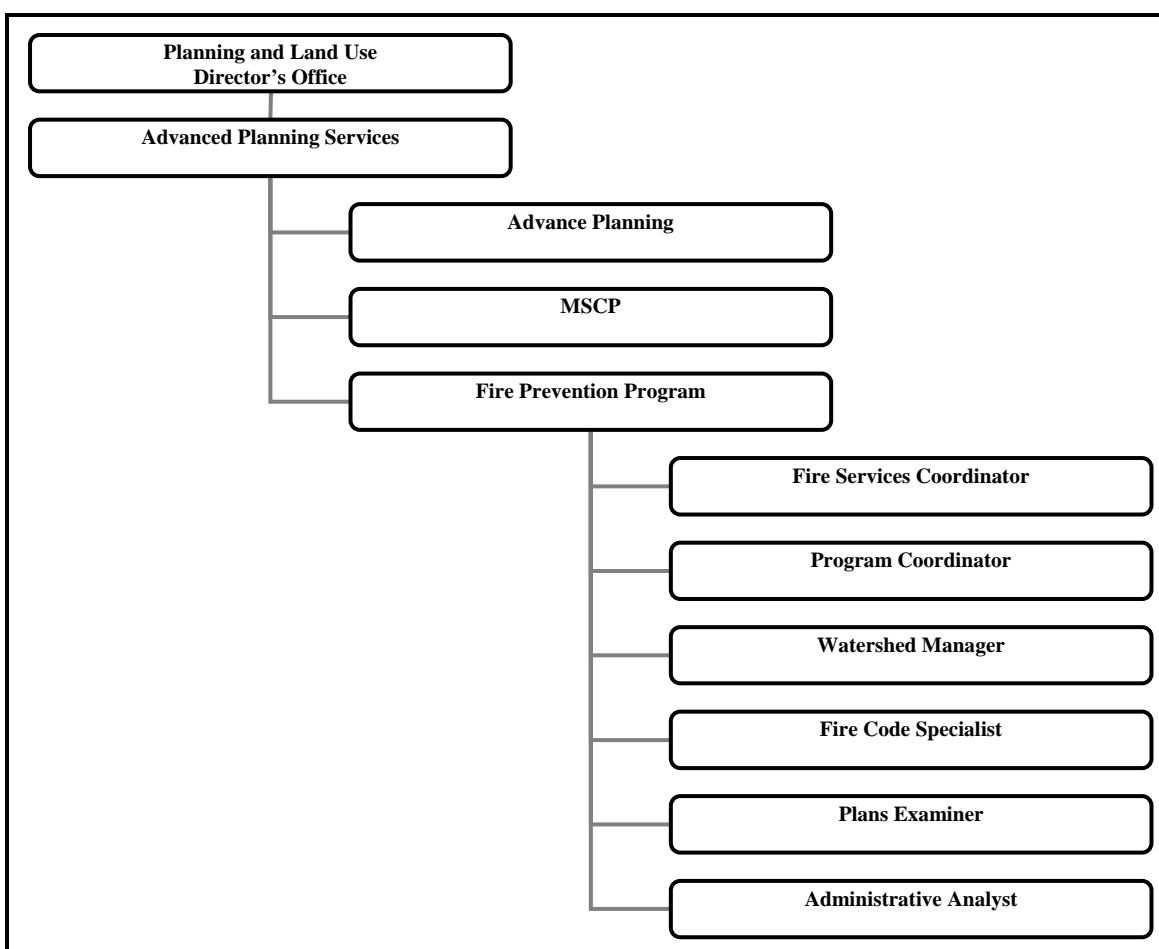


Figure 6.17: DPLU Organizational Structure for the Non-emergency Fire Fighting Element

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Table 6.37: DPLU Implementation Roles and Responsibilities for the Non-emergency Fire Fighting Element

Significant Activity	Description	Responsible Staff
Administrative Activities		
Source Characterization	Activities and pollutant sources should be evaluated to ensure that all potential pollutants are accounted for and sufficiently addressed.	<ul style="list-style-type: none"> Watershed Manager
BMP Requirements and Recommendations	Regular review of BMPs will help identify improvement needs and corrective actions that should be taken. Where appropriate, BMPs should be revised to meet the MEP requirements.	<ul style="list-style-type: none"> Watershed Manager
Implementation Strategies and Tools	Strategies to include outreach and education for communities through partnerships with associations, member agencies, and fire districts.	<ul style="list-style-type: none"> Lead Staff
Staff Training	Training should ensure that staff is knowledgeable of stormwater requirements and able to properly conduct their job responsibilities and implement BMPs.	<ul style="list-style-type: none"> Watershed Manager, Fire Services Coordinator
Facilitation of Targeted Outcomes		
Formal Agreements	Contracted services needs to include stormwater language and requirements included within the document. Stormwater requirements should also be provided to ensure that contractor is aware of issues or any specific requirements such as use of specific BMPs.	<ul style="list-style-type: none"> Lead Staff
Permits	Where permits are required & issued by a County employee, language can be incorporated to include any applicable stormwater requirements.	<ul style="list-style-type: none"> Lead Staff
Inspections	Inspections conducted by Fire Departments or County staff, should also address any applicable stormwater requirements. Inspection types include, fire extinguishing systems, storage lots (wood chips, compost, yard waste, recycling, etc.), etc.	<ul style="list-style-type: none"> Lead Staff

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Significant Activity	Description	Responsible Staff
Outreach	Community outreach will assist with customer acceptance and understanding of stormwater activities. Additionally, there are many considerations that home owners should make when implementing defensible space and maintaining surrounding vegetation. Opportunities include community events, association meetings, and fire station open house events.	<ul style="list-style-type: none"> All program staff
Training (municipal staff or contractors; “target audience”)	All County staff is required to receive annual stormwater training which is tailored to their specific job responsibilities. Since fire personnel are not employed by the County, the fire departments within the unincorporated County in Region 9 will receive a stormwater training presentation and handout materials.	<ul style="list-style-type: none"> All program staff
Partnerships (professional and industry organizations, etc.)	Partnerships with organizations help facilitate acceptance and implementation of stormwater requirements by the fire community. Partnerships provide a venue to provide training and outreach to the community as well as Fire Department personnel. Organizations that should be considered include: CDF, DFG, USFWS, Fire Chief Assoc., Fire District Assoc., SD County Fire Protection Districts (16), community groups and clubs, etc.	<ul style="list-style-type: none"> Lead Staff
Compliance Verification		
Internal Tracking by Program Staff	Document review/verification, and post activity observations via random sampling are means in which staff can verify that program responsibilities are appropriately implemented.	<ul style="list-style-type: none"> Lead Staff
Complaint Investigations	Complaints received regarding fire department discharges will be investigated as necessary to ensure compliance with stormwater regulations. Customer complaints, complaint referrals, and coordination with the WPP are methods which can provide feedback on the effectiveness of the program.	<ul style="list-style-type: none"> WPP Auditors

6.13 Special Events Element

6.13.1 Background

Within the County of San Diego a large and diverse array of events are held at varying venues. Special events include festivals, fairs, cultural events, parades, sporting events, charity runs, and carnivals. These events showcase unique aspects of the municipality or rural community, and represent one of the few opportunities when residents and businesses can come together to celebrate what makes their community special. Special Events “that are expected to generate significant trash and litter” are specifically addressed in the Permit as requiring BMPs to prevent stormwater discharges.

Special events are held at a wide variety of venues throughout the County including parks, recreational facilities, parking lots, streets and highways, airports, and worship and community centers. Venues typically include those that are located at fixed facilities as well as remote locations.

The County’s diverse events frequently have a targeted community or special interest group. Event categories include: landscape or agricultural, aviation or automobile, antiques, cultural, holidays, arts, and environmental. Some of the regular events that are held within the County draw attendees from all parts of the County and beyond. They include: Fallbrook’s Avocado Festival; Quail Botanical Garden’s Insect and Garden Festival; Ramona’s Air Fair; Lakeside’s Rodeo; and Julian’s Harvest Festival.

There are two distinguishing classifications of events: County Permitted Events and Events held at County Facilities.

County permitted events. These events are defined as: community events that occur within the County of San Diego; are sponsored by either a profit or non-profit organization; and are planned for a time period of 4 hours to four days. Organizers of events which meet this criteria must obtain a permit by the appropriate permitting department(s).

Events held at County Facilities. These events are defined as either corporate or family events that occur on County parks and recreational facilities or County employee events hosted by the County. Parks and other recreational facilities may be reserved for events such as corporate events, team building programs, wedding receptions, or family reunions. The County hosts various types of events for its employees for informational, educational, cultural, or celebratory reasons. Examples of events held for County employees include: employee benefits fairs; health fairs; energy conservation fairs; and department meetings.

6.13.2 Source Characterization

6.13.2.1 Event Inventory¹⁴

Events occur both regularly (e.g. monthly or annually) and on a one-time basis. Due to the fluctuating nature of special events there isn't a pre-event inventory. Therefore inventories can only be generated post-event and are included annually in the County's JURMP Annual Report. Within the Annual Report the Special Events inventory includes all County permitted events. Since Events held at County facilities have on-site staff responsible for regular grounds and housekeeping, these events have continuous oversight and ongoing stormwater BMP implementation and maintenance. Stormwater compliance is incorporated into regular facility activities and reporting, and therefore, is not reported separately with the permitted events inventory.

6.13.2.2 Activities and Pollutants

Table 6.38 provides a comprehensive listing of the significant Pollutant-generating Activities (PGAs) which may be associated with Special Events, and indicates the Pollutants-of-Concern (POCs) typically associated with each. Specific PGAs and POCs associated with individual facilities vary depending on their actual uses and operations, and may therefore differ from those presented. The pollutants most commonly associated with special events are trash and litter. Descriptions of each PGA applicable to Special Events and other municipal operations and activities are provided in Attachment 6.2.

¹⁴ Event inventories are provided annually in the County's JURMP Annual Report.

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Table 6.38: PGAs and POCs for Special Events.

PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
Category A: Management of Materials , Equipment, and Wastes									
A.1	MATERIALS MANAGEMENT								
A.1.a	Materials Loading & Unloading	X		X	X		X		
A.1.b	Storage of Materials	X		X			X		
A.1.c	Liquid Container Storage				X		X		
A.2	WASTE HANDLING AND STORAGE								
A.2.b	Solid Waste	X		X					
A.2.c	Food Grease and Oil		X			X	X		
A.2.d	Pet Waste / Manure		X			X			
A.2.e	Liquid Waste		X					X	
A.2.f	Sanitary Wastes		X	X		X			
A.2.g	Green Waste		X			X			
A.2.h	Recyclables / Reusables			X	X				
Category B: Vehicle and Equipment Activities									
B.2	VEHICLE AND EQUIPMENT REPAIR, MAINTENANCE, AND SERVICE								
B.2.c	Vehicle and Equipment Fueling						X	X	
B.2.e	Equipment Cleaning	X	X	X	X	X	X	X	
Category C: Outdoor Area Maintenance									
C.1	BUILDING AND GROUNDS MAINTENANCE								
C.1.a	Parking Areas	X		X	X		X	X	
C.1.f	Sidewalks	X		X					
C.1.g	Break Areas and Public Areas			X		X			
C.1.h	Pressure Washing	X			X		X		
C.2	ROADS AND STREETS								
C.2.b	Road and Street Use	X		X	X		X	X	
C.3	STORM DRAIN SYSTEMS								
C.3.c	Illicit Discharges & Connections	X	X	X	X	X	X	X	
Category D: Specific Operations and Activities									
D.10	Dust and Particulate-Generating Activities	X							
D.15	Floors, Mats, and Surface Cleaning	X				X	X	X	

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PGA Reference Number	Pollutant-Generating Activity (PGA)	Pollutants-of-Concern (POC)							
		Sediment	Nutrients	Trash & Debris	Metals	Pathogens	Oil & Grease	Other Organics	Pesticides
D.16	Food Preparation			X		X	X		
D.24	Recreational Uses	X		X		X			
D.26	Special Events	X	X	X	X	X	X	X	

6.13.3 Best Management Practices Requirements

The updated WPO, effective April 12, 2008, reflects the new requirements of the January 24, 2007 Permit re-issuance. Special Events must meet the applicable requirements set out in the WPO sections 67.801 through 67.810. The use of pollution prevention (P2) practices is always encouraged, and required where applicable and feasible. Specific application of BMPs is determined on a site-by-site basis to address the specific PGAs applicable to each event. Special Event related BMP handouts are distributed to event organizers prior to obtaining a permit. Event organizers are required to complete a certification form to ensure they have a full understanding of the BMP requirements for their specific event and to acknowledge that they are fully responsible for post-event clean-up.

6.13.4 Program Implementation

The Special Events program is implemented by many County departments. Several departments are involved directly in the review of the TCEP application. Departments and programs include:

- Department of Environmental Health (DEH) for Food and Housing Division;
- Department of Planning and Land Use (DPLU), Zoning, Noise Abatement, and Building Inspection;
- Department of Human Resources (DHR) Risk Management Division;
- Sheriff Licensing;
- Alcohol Beverage Control (ABC);
- Department of Parks and Recreation (DPR);
- Department of Public Works (DPW) for Roads;
- Roads Division and Recycling Program; and
- Animal Services.

County Permitted Events

The County of San Diego requires event organizers to apply for a County Permit for any event meeting the definition of County Permitted events in Section 6.13.1. The current permit application and guidance documents are provided in Attachment 6.3. Event organizers submit an application that gets routed for approval from each department having jurisdiction over the various aspects of the event. The permit and guidance provided addresses numerous concerns including issues related to: animal services, food and beverage, risk management, waste management, public health and safety, and transportation. There is significant coordination between County departments and external agencies such as the California Highway Patrol, State Board of Equalization, and Alcoholic Beverage Control.

The application requires the event organizer to prepare a clean-up plan, which is approved prior to issuing the permit. The development of a clean-up plan particularly addresses post-event cleanup. Recycling, composting, and waste minimization are also important targets for special events clean-up plans. County Permitted Events can occur anywhere through-out the County, therefore, event organizers are required to complete an application which includes BMP implementation during and after the event to ensure proper event set-up and clean-up. For Special Events which “are expected to generate significant trash and litter,” additional documentation detailing specific BMPs to prevent stormwater discharges may be required.

The current program addresses litter enforcement, waste reduction, and recycling, which all directly relate to preventing litter and trash from entering the storm drains.

Current stormwater considerations for special events include, if applicable:

- Provide waste hauler information contracted for solid waste clean up;
- Increase number of trash containers and bins provide for the event (as well as additional pick ups by the hauler, if needed for multiple day events);
- Clean-up plan to ensure post-event cleanliness and preservation of event area;
- Designated responsibility for cleaning up after animals during and after the event;
- Portable toilet availability, maintenance and spill response;
- Fuel handling;
- Parking considerations;
- Provide equipment or utensil washing facilities for food booth operations and proper disposal of wastewater;
- Provide a special event waste management plan which describes:
 - o Garbage/trash disposal;
 - o Collection of recyclables;
 - o Amount recycle and disposed; and
 - o Description of materials and waste a plan to recycle or disposal (e.g. cardboard, paper, beverage containers, food waste, plastics, other);

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- For athletic events, water/feed areas shall be established in permeable areas where possible, or the area shall be cleaned immediately post event;
- Non-hazardous wastewater must drain to sewer. No wastewater may be discharged to ground or storm drains; and
- Street sweeping for cleaning up streets and gutters, as needed.

Applicable County departments review the applications for the special event permits for the issues and topics that each is responsible for. During the permit application review process, if the applicant is unable or unwilling to comply with any of the stated requirements or if the applicant has had poor compliance history in the past, the permit application will be denied. After careful review, department staff either approves or deny the permit application.

At the conclusion of the event, if it is determined that the clean up has not been sufficiently completed, appropriate crews are dispatched to conduct the clean up at the event organizers expense. Should the clean-up plan not be implemented as approved, the event organizer/manager may be required to provide a cash deposit or surety bond, to ensure the clean up funding is available if needed for future events.

Figure 6.18 shows the application process for the Permit process. The flow chart below shows the process for application submittal and approval or denial.

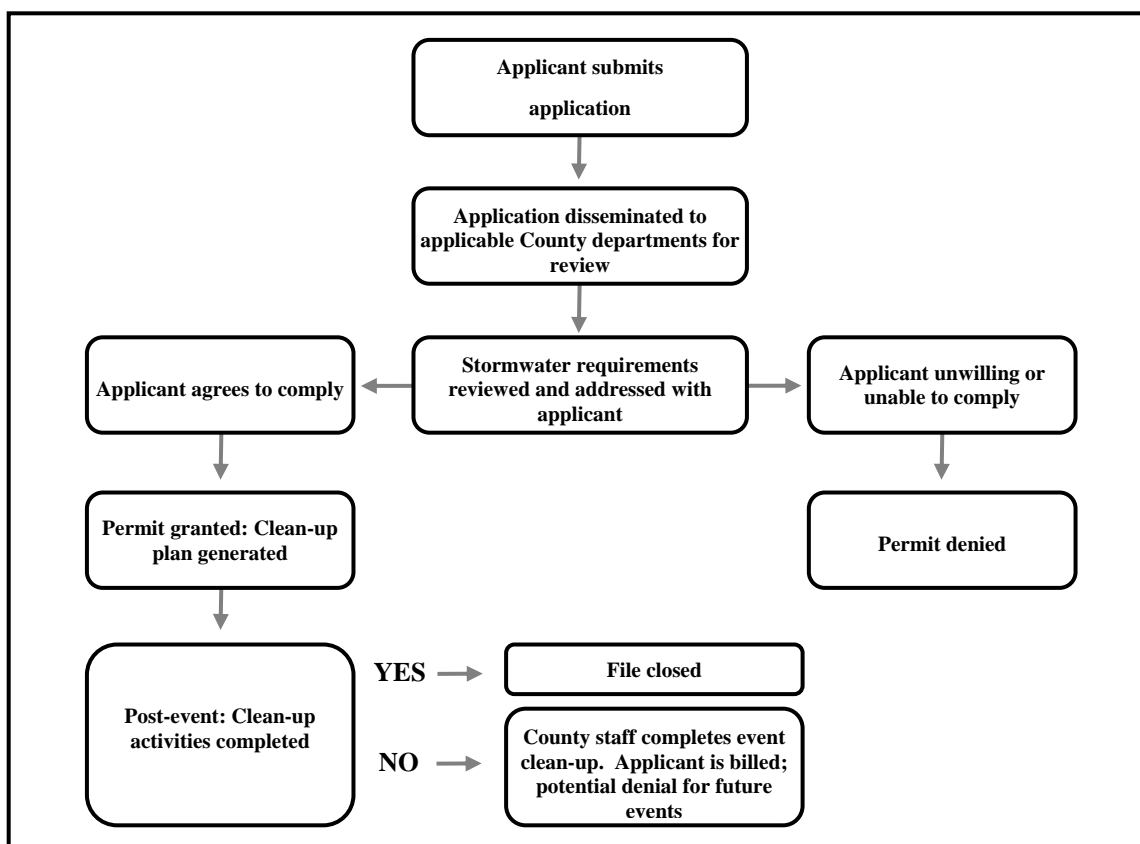


Figure 6.18: Permit Application Process

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6.14 Program Review and Modification

Table 6.39 identifies modifications made to the Municipal Component since its March 24, 2008 submittal.

Table 6.39: Modifications to the Municipal Component

Date	Section(s)	Modification(s)
05-20-08		Addition of table of contents.
05-20-08	6.15	Addition of section 6.15 to allow for tracking of JURMP modifications.
05-20-08	Multiple	Various non-substantive corrections including: formatting, punctuation, and grammar; insertion of textual references to tables and figures; re-titling of figures and tables for consistency; insertion and re-titling of headings for consistency; and corrections to figures, attachments, and organizational charts.
06-30-10	All	<p>Modify the JURMP to (1) incorporate the implementation strategy figures contained in this JURMP Annual Report, (2) to add and explain specific targeted, measurable outcomes, and (3) to identify specific roles and responsibilities for meeting identified outcomes. Completed 6-23-10.</p> <p>Note: A summary Implementation strategy figure was incorporated into the Municipal introduction section 10.1. This provides a framework for the selection of individual, targeted outcomes in each fiscal year.</p> <p>Although the County initially intended to add these outcomes to the JURMP document, it was determined on further review that this level of detail is more appropriately provided in the JURMP Annual Reports. Roles and responsibilities are included in each municipal sub-section. An overview of the Municipal program was also included in the introduction.</p> <p>Review and update priority PGA references (solid diamonds) and update priority POC references in all sections. Completed 6-23-10. All PGA and POC tables were updated. The priority PGA diamonds were determined to be unnecessary and were removed.</p> <p>Editorial changes: formatting, textual references, review for consistency. Completed 6-23-10. All sections were reviewed and updated for accuracy, consistency, and appropriate content.</p> <p>Update Municipal facility inventories. Completed 6-23-10. On further review, updates were determined to be unnecessary. Up-to-date inventories are included in each annual report therefore a reference to the Annual Report was included for each municipal inventory section. Inventory numbers were not updated in the JURMP. Inventories found within the JURMP 2010 update are not substantially changed from the time of initial JURMP submittal.</p>
06-30-10	6.2	Update Table 6.2 with updated ADT criteria. Update WPO reference numbers (pg 7). Completed 6-23-10. ADT criteria updated. WPO reference numbers were correct.
06-30-10	6.3	Review and update MS4 Threat to Water Quality prioritization Table 6.8. Completed 6-23-10. MS4 TTWQ Table 6.8 updated. Section has been thoroughly reviewed and revised.
06-30-10	6.4	Move Table 6.13 from Section 6.5 to Section 6.4. Update Figure 6.5 to

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		reflect organizational changes. Completed 6-23-10. Table 6.13 was moved. Figure 6.5 (now 6.7) was updated.
06-30-10	6.5	Replace Figures 6.6 and 6.7 with updated map and organizational chart supplied by wastewater. Update Table 6.13 to reflect organizational changes. Completed 6-23-10. Figure 6.6 was deemed adequate and was not updated. Figure 6.7 (now 6.9) was updated. Table 6.13 (now 6.16) was updated.
06-30-10	6.6	Update Table 6.18 with facility TTWQ priorities. Completed 6-23-10. TTWQ priority tables for all facilities (non-linear) were removed from individual sections and are now summarized in the Municipal introduction section 6.1.
06-30-10	6.7	Update Table 6.21 with fuel station responsibilities. Update Table 6.23. Update Figure 6.10 to reflect organizational changes. Completed 6-23-10. Table 6.21 (now 6.20) does not list responsibilities and was therefore not updated (past inventory). Table 6.33 (now 6.22) was updated with responsibilities. Figure 6.10 (now 6.12) was updated.
06-30-10	6.8	Updated text for accuracy, consistency, and grammar. Updated WPO numbers and removed inconsistent and irrelevant text. Updated Table 6.25.
06-30-10	6.9	Update Table 6.27 inventory and property designations. Update Table 6.30 to reflect contractual stormwater language in SOW's for projects generated through P&C. Completed 6-23-10. Table 6.27 (now 6.26) has been updated with additional parks and descriptions. Table 6.30 (now 6.28) has been updated.
06-30-10	6.10	Combine Section 6.10 (1 Household Hazardous Waste facility) with Section 6.11 (other facilities). Completed 6-23-10. Sections 6.10 and 6.11 have been combined. All following sections have been reduced in number by one.
06-30-10	6.11 (6.10)	Section to become 6.10 with merge of Household Hazardous Waste facilities. Add organizational charts. Update Table 6.36 with new responsibilities. Completed 6-23-10. Sections 6.10 and 6.11 have been combined. All following sections have been reduced in number by one. Organizational charts have been removed due to multiple departments involved. Responsibilities have been updated.
06-30-10	6.12 (6.11)	Section to become 6.11. Update Figure 6.15 and Table 6.38 to reflect spelling changes and replace references to DPR and DGS with references to AWM. Add pesticide and herbicide application BMP table. Completed 6-23-10. Figure 6.15 (now 6.16) and Table 6.38 (now 6.33) titles updated. Pesticide BMPs added as bulleted list.
06-30-10	6.13 (6.12)	Section to become 6.12. Remove insertion following Table 6.40: "6.1.2 Discharges Applicable to Activities Conducted by Fire Departments". Completed 6-23-10. Section has been thoroughly reviewed and revised.
06-30-10	6.14 (6.13)	Section to become 6.13. Update sections to reflect changes in permitting process (6.14.2, 6.14.4, 6.14.6). Update Figure 6.17. Completed 6-23-10. Section has been thoroughly reviewed and revised.