

MONTEREY REGIONAL STORM WATER PERMIT PARTICIPANTS GROUP

December 15, 2005

Chairperson
Elizabeth Krafft

Vice-Chairperson
Tim O'Halloran

Member Entities

City of Pacific Grove

City of Monterey

City of Sand City

City of Seaside

City of Del Rey Oaks

City of Marina

County of Monterey

**Other Participating
Entities**

City of Carmel

Pebble Beach Company

Monterey Peninsula
Unified School District

Carmel Unified School
District

Pacific Grove Unified
School District

Program Manager

Monterey Regional Water
Pollution Control Agency

5 Harris Court

Donette Dunaway
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Dear Ms. Dunaway,

The Management Committee (Committee) of the Monterey Regional Storm Water Management Program (MRSWMP) received the document prepared by the Natural Resources Defense Council (NRDC) and the Ocean Conservancy titled "Practical Plan for Pollution Prevention – Storm Water Solutions for the Monterey Region" (hereinafter referred to as the "Plan") on October 20, 2005, which was 11 days before the Regional Water Quality Control Board's (RWQCB) October 31, 2005 deadline for submittal of the revised MRSWMP.

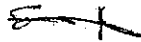
After review of the Plan, the Committee strongly believes that the revisions made in preparing the October 31, 2005 version of the MRSWMP are fully responsive to all of the issues raised in the Plan. A matrix is attached that provides an item-by-item response to each of the issues raised in that document. The Committee further believes that the October 31, 2005 version of the MRSWMP fully complies with all applicable requirements of the State General Permit Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s).

The Committee urges approval of the MRSWMP at the RWQCB Hearing scheduled for February 10, 2006, with permit coverage beginning immediately thereafter. This will allow the participants to focus on implementing the many BMPs and other activities described in the MRSWMP.

The Committee requests that this letter and the attached matrix be included in the agenda packet for the RWQCB hearing on the MRSWMP.

Thank you for your consideration in regards of this matter.

Sincerely,



Elizabeth Krafft
Chair
Management Committee

Attachment

Item No. 5 Attachment No. 6
February 9-10, 2006 Meeting
Monterey Regional Stormwater
Management Plan

**MINIMUM CONTROL MEASURE NO. 1
PUBLIC EDUCATION AND OUTREACH**

What the State's General Permit Requires (taken verbatim from the applicable section of the General Permit):
"The Permittee must implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff."

**How This Issue was Addressed in the October 31, 2005 Revised
Version of the MRSWMP**

The Public Education and Outreach Program contained in pages E-1 through E-17 of the MRSWMP contains a comprehensive set of Program Activities that are keyed to a corresponding set of Measurable Goals. The direct connection between each Program Activity and its Measurable Goal is clearly shown in the table on page E-15.

The Public Education and Outreach Program Activities reach out to a wide and diverse audience throughout the geographic boundaries of the MRSWMP. They include school outreach programs; educational displays and handout materials at numerous high-visibility locations; public outreach events; specialized training for restaurant employees and owners; bilingual radio, print media, bus, and movie ads; and BMP brochures.

The Public Education and Outreach Program provides education and outreach on a very broad range of storm water pollution prevention topics. The Program Activities make use of highly acclaimed and widely used educational materials such as the "Our Water Our World" display program and outreach events developed in 1997 under an SWRCB grant and used extensively in over 18 counties in California, training materials targeted at the restaurant and automotive industries as developed by the City of Los Angeles and the MURP program, storm drain poster materials which make the connection between human activities on land and their impacts on the marine environment, brochures such as "Monterey Bay Begins on Your Street" highlighting a number of specific storm water pollutants, and the award winning "Dirty Word" series of public service announcements which is used in several counties in California.

**What the
"Practical Plan for Pollution
Prevention" Requests**

Revise program intent to tie in to objectives and measurable outcomes

Expand program to target a more diverse set of audiences, including tourists

Revise program topics to include a broader range of issues

<p>What the “Practical Plan for Pollution Prevention” Requests</p>	<p>How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP</p>
<p>Include some tool to facilitate future revision and improvement of the program</p>	<p>BMP 1-1.b states “Review & revise “Year 1 Public Education & Outreach Plan” to maximize efficiency in audience reached, and address current contaminants impacting water quality. Changes will be based on input from the public, volunteer monitoring network data, budgetary constraints, and contaminants of concern or audiences not covered as in depth in prior years.”</p>
<p>Develop and incorporate basic education commitments for years 2 – 5</p>	<p>BMP 1-1.a calls for implementation of the Public Education and Outreach Program to begin in Year 1, and BMP 1-1.b calls for the Program to be revised to improve its effectiveness in Years 2 through 5. Thus, the Program is in effect in all 5 of the Permit years.</p>
<p><u>Conclusion:</u> The Public Education and Outreach Program is fully responsive to the requests made in the “Practical Plan for Pollution Prevention” and clearly fulfills all of the requirements of the General Permit for this Minimum Control Measure.</p>	

MINIMUM CONTROL MEASURE NO. 2 PUBLIC PARTICIPATION AND OUTREACH	
What the State's General Permit Requires (taken verbatim from the applicable section of the General Permit): <i>"The Permittee must at a minimum comply with State and local public notice requirements when implementing a public involvement/participation program."</i>	
What the "Practical Plan for Pollution Prevention" Requests	How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP
Revise program to include additional detail and to make specific commitments for years 2 - 5	BMPs 2-1 and 2-2 are to "Encourage general public and stakeholder involvement in identifying and solving storm water management problems by holding two publicly advertised 'Public Involvement Workshops' per a year" and "Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities." Both of these BMPs are continued throughout all 5 of the permit years. It is implicit in these BMPs that the scope of activities conducted under the Public Participation and Outreach Program will be modified as more experience is gained and more public input and participation occurs. It is not possible, in fact it would be presumptuous, to provide more detail or make specific commitments prior to receiving the public input and experience that will occur through these annual public participation and involvement activities.
Revise objectives to focus on public input and feedback, rather than education	As noted above these BMPs do precisely this - they focus on public input and feedback, not education. Other BMPs under this Minimum Control Measure involve "hands on" public participation activities such as storm drain stenciling and the Coastal Cleanup Day, Urban Watch, and First Flush programs.
Provide more time for public review of annual reports before workshops	BMP 2-1.a provides one month, rather than the previously proposed one-week, of public review of the draft annual reports before the workshops are held.

<p style="text-align: center;">What the "Practical Plan for Pollution Prevention" Requests</p>	<p style="text-align: center;">How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP</p>
<p>Modify format of second public workshop to facilitate collection of ideas and public input mid-year, at a time when permittees can take action</p>	<p>BMPs 2-1.c and 2-1.d state that Annual Workshop # 2 will be held in mid-year (March/April) and will either focus on a general overview of Phase II requirements, and BMPs selected to increase overall awareness and knowledge of Phase II program by the general public, or will focus on a specific target audience and associated contaminants of concern. The decision on the focus will be based on knowledge and experience gained by the Participating Entities from carrying out the MRSWMP up to the time the Workshop is scheduled.</p>
<p>Promote public participation in Coastal Cleanup Day and First Flush by providing advertising and incentives for participation, in addition to financial support</p>	<p>BMP 2-2.b calls for the Permittees to "Recruit volunteers through municipal employee base for Annual Coastal Clean Up Day or other local clean up efforts." BMP 2-2.c calls for the Permittees to "Provide support for, or assistance with ... volunteer recruitment & dedicating MRSWMP allocated hours by MBNMS staff." BMP 2-2.c calls for the Permittees to "Provide financial support for, and assistance with volunteer monitoring programs such as: Urban Watch, First Flush, or other storm water quality protective programs." The financial assistance will be used by the coordinators of these programs to advertise them and provide incentives for participation such as recognition events and publicity.</p>
<p>Add a watershed stewardship program component</p>	<p>A watershed stewardship program already exists in the form of the Citizen Water Quality Monitoring Network. BMP 2-3.a calls for the MRSWMP Participating Entity group to become an active participant in the Citizen Water Quality Monitoring Network and to have a representative from the MRSWMP group attend each monitoring network meeting and report back to the group. It also calls for the Participating Entities to recruit volunteers through employee and citizen group channels, websites, and / or newsletters to participate in volunteer network monitoring activities.</p>
<p>Add a Citizens Advisory Committee component</p>	<p>As noted above the Citizen Water Quality Monitoring Network already exists and it, along with the annual Public Input Workshops that will be held under BMP 2-1 will provide ample opportunity for citizen input into the MRSWMP's programs and activities.</p>
<p style="text-align: center;">Conclusion: The Public Participation and Outreach Program is fully responsive to the requests made in the "Practical Plan for Pollution Prevention" and clearly fulfills all of the requirements of the General Permit for this Minimum Control Measure.</p>	

**MINIMUM CONTROL MEASURE NO. 3
ILLICIT DISCHARGE DETECTION AND ELIMINATION**

What the State's General Permit Requires (taken verbatim from the applicable section of the General Permit):

"The Permittee must:

- *Develop, implement, and enforce a program to detect and eliminate illicit discharges (as defined at 40 CFR §122.26(b)(2)) into the regulated Small MS4*
- *Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and locations of all waters of the U.S. that receive discharges from those outfalls*
- *To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the MS4 and implement appropriate enforcement procedures and actions*
- *Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit*
- *Inform public employees, businesses, and the general public of the hazards that are generally associated with illegal discharges and improper disposal of waste*
- *Address [a specific list of categories]* of non-storm water discharges or flows (i.e., authorized non-storm water discharges) only where they are identified as significant contributors of pollutants to the Small MS4"*

*(*List omitted from this citation for brevity)*

How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP

What the "Practical Plan for Pollution Prevention" Requests

Add commitment to respond to and eliminate 100% of illicit discharges or connections detected as a result of the call-in number

BMP 3-1.c requires each Participating Entity to "...investigate and take appropriate action on each report of illicit discharge that is received." This pertains to the 1-800-CLEANUP hotline that the Participating Entities are subscribing to in order to have a unified place for the public to report potential illicit discharges. Investigation and followup actions are to be carried out as described in the "Protocol for Responding to Reports of Illegal Discharges and Illicit Connections" contained in pages E-23 through E-26 of the MRSWMP.

<p>What the "Practical Plan for Pollution Prevention" Requests</p>	<p>How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP</p>
<p>Add recordkeeping and reporting requirement for use of call-in number</p>	<p>The "Protocol for Responding to Reports of Illegal Discharges and Illicit Connections" contained in pages E-23 through E-26 of the MRSWMP includes a form titled "Illicit Discharge/Connection Reporting and Response" which accomplishes recordkeeping and reporting.</p>
<p>Map storm drain now, or at a minimum, within 1 year of storm water management program approval</p>	<p>The "Southern Monterey Bay Storm Water Outfall Map" and the "Northern Monterey County Storm Water Outfall Map" contained in pages E-27 and E-28 of the MRSWMP provide the storm water mapping required by the General Permit. The County of Monterey is continuing its mapping work, and these maps will be updated to reflect any additional outfalls identified in that work. The General Permit allows entities to complete their mapping at a reasonable point within the 5-year permit term, so allowing the County of Monterey time to perform this work is well within the provisions of the General Permit.</p>
<p>Inventory and prioritize businesses now, or at a minimum, within 1 year of storm water management program approval</p>	<p>The business inventories have been completed and are contained in pages E-29 through E-27 of the MRSWMP.</p>
<p>Add dry-weather screening program to cover entire municipal storm sewer system</p>	<p>The Citizen Water Quality Monitoring Network and the Urban Watch Program (discussed in BMPs 2-2 and 2-3) are existing ongoing programs that address dry-weather outfall monitoring. The Participating Entities will participate in these programs under those BMPs.</p>
<p>Commit to a follow-up/enforcement program for all illicit discharges detected</p>	<p>BMP 3-1.c requires each Participating Entity to "...investigate and take appropriate action on each report of illicit discharge that is received." This is to be carried out as described in the "Protocol for Responding to Reports of Illegal Discharges and Illicit Connections" contained in pages E-23 through E-26 of the MRSWMP.</p>
<p>Add a sewage spill response program, aimed at preventing entry of sewage into the storm sewer to the maximum extent practicable</p>	<p>Sewage spills are formally regulated by the RWQCB under Waste Discharge Requirements Order No. R3-2002-0078 that was issued to each of the Participating Entities in November 1, 2002. This Order specifically requires the implementation of a Sanitary Sewer Overflow and Response program by each of the Participating Entities, and use of the RWQCB's Sewage Overflow Form to report and sewage overflow incidents. Thus, this matter has already been fully addressed under the RWQCB's Order and should not be duplicated in the MRSWMP.</p>

<p>What the "Practical Plan for Pollution Prevention" Requests</p>	<p>How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP</p>
<p>Add comprehensive program for inspections of existing development (commercial, industrial, residential)</p>	<p>BMP 3-3 calls for each of the Participating Entities to train their personnel in inspection techniques, and to inspect prioritized businesses for the presence of illicit connections and illegal discharges. Specific training materials are contained in Appendix F of the MRSWMP, and business inspection checklists are contained in pages E-48 through 59 of the MRSWMP.</p>
<p>Complete storm water ordinance now, based on existing model ordinances</p>	<p>BMP 3-4.a requires each Participating Entity to adopt a comprehensive storm water ordinance in Year 1, based on the model ordinance contained in pages E-67 through E-80 of the MRSWMP.</p>
<p>Ensure that storm water ordinance contains specific enforcement provisions</p>	<p>Division V of the model ordinance contained in pages E-78 through E-80 of the MRSWMP contains the Enforcement provisions.</p>
<p>Add provisions to facilitate household hazardous waste disposal.</p>	<p>The Monterey Regional Waste Management District, which provides sanitary landfill and solid waste recycling services throughout the geographic area of the MRSWMP, has active programs to both educate the public on the proper disposal of household hazardous wastes, and programs to encourage these wastes to be brought in for proper disposal. Thus, another fully capable and effective public agency in the MRSWMP area is already carrying out this activity, so there is no need to duplicate it under the MRSWMP.</p>
<p>Conclusion: The BMPs in the MRSWMP are fully responsive to the requests made in the "Practical Plan for Pollution Prevention" and clearly fulfill all of the requirements of the General Permit for this Minimum Control Measure.</p>	

**MINIMUM CONTROL MEASURE NO. 4
CONSTRUCTION SITE STORM WATER RUNOFF CONTROL**

What the State's General Permit Requires (taken verbatim from the applicable section of the General Permit):

"The Permittee must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the Small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include the development and implementation of, at a minimum:

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

**What the
"Practical Plan for Pollution
Prevention" Requests**

Adopt construction site ordinance now, based on existing model ordinances, and incorporating Attachment 4 Receiving Water Limitations

**How This Issue was Addressed in the October 31, 2005 Revised
Version of the MRSWMP**

BMP 4-1.a requires each Participating Entity to adopt a comprehensive storm water ordinance in Year 1, based on the model ordinance contained in pages E-67 through E-80 of the MRSWMP, which includes standards for general construction site waste management for construction activities as defined by the General Construction Storm Water Permit. The Receiving Water Limitations in Attachment 4 of the General Permit do not apply to construction runoff, but rather to runoff from development and redevelopment projects. This is addressed under Minimum Control Measure No. 5.

<p style="text-align: center;">What the "Practical Plan for Pollution Prevention" Requests</p>	<p style="text-align: center;">How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP</p>
<p>Include General Construction, Spill Prevention Planning, Vehicle Maintenance Area, and Inspection BMPs from EPA's National Menu of BMPs</p> <p>Expressly include requirement of reducing storm water pollution to MEP and complying with water quality standards as part of site plan review process</p> <p>Revise program to provide for construction site inspections beginning immediately</p>	<p>The BMP Guidance Series in pages E-81 through E-101 of the MRSWMP address all of these issues. The BMP Guidance Series is based on materials drawn from the MURP, the CASQA Handbooks, and the EPA Menu of BMPs. The BMP Guidance Series is cited in the model ordinance and thereby sets the standards that apply to construction projects.</p> <p>BMPs 4-2.a and 4-2.b describe how each Participating Entity will implement procedures for site plan review, including consideration of potential water quality impacts. These procedures are detailed in the "Construction Site Plan Review and Inspection Procedures" contained in pages E-110 through E-112 of the MRSWMP.</p> <p>BMP 4-3.b requires each Participating Entity to inspect 100% of the construction sites subject to the storm water ordinance, beginning in Year 2 and continuing through Year 5 of the permit. The ordinance itself is to be adopted in Year 1. Inspection procedures are detailed in the "Construction Site Plan Review and Inspection Procedures" and the "Inspection Checklist for Construction Sites" contained in pages E-110 through E-117 of the MRSWMP.</p>
<p>Revise inspection program to provide for weekly inspections of all construction sites.</p>	<p>Weekly inspections are not required by the General Permit, and would rarely be necessary, particularly since most construction occurs during the rainless months of the year. Page E-110 of the MRSWMP states: "Construction site inspections will normally be performed in early fall, sufficiently far enough in advance of the normal first rainfall of the year so that any deficiencies can be corrected before the onset of the rainy season. The inspections will be coordinated with the RWQCB staff." The Inspection Checklist for Construction Sites contained in pages E-113 through E-117 of the MRSWMP will be used by inspectors to conduct their inspections.</p>
<p style="text-align: center;">Conclusion: The BMPs in the MRSWMP are fully responsive to the requests made in the "Practical Plan for Pollution Prevention" and clearly fulfill all of the requirements of the General Permit for this Minimum Control Measure.</p>	

**MINIMUM CONTROL MEASURE NO. 5
POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND
REDEVELOPMENT**

What the State's General Permit Requires (taken verbatim from the applicable section of the General Permit):

"The Permittee must:

- *Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the Small MS4 by ensuring that controls are in place that would prevent or minimize water quality impacts*
- *Develop and implement strategies, which include a combination of structural and/or non-structural BMPs appropriate for your community*
- *Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law For those Small MS4s described in Supplemental Provision E, the requirements must at least include the design standards contained in Attachment 4 of this General Permit or a functionally equivalent program that is acceptable to the appropriate RWQCB*
- *Ensure adequate long-term operation and maintenance of BMPs."*

<p align="center">How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP</p>	
<p align="center">What the "Practical Plan for Pollution Prevention" Requests</p> <p>Explicitly incorporate Attachment 4 receiving water limitations and design standards into the storm water management program, and require compliance by all permittees</p>	<p>BMP 5-1.a requires each Participating Entity to adopt a comprehensive storm water ordinance based on the model ordinance contained in pages E-67 through E-80 of the MRSWMP, which includes standards for the design, operation, and maintenance of post-construction storm water pollution prevention systems in new developments and redevelopment. On pages E-86 and E-96 through E-101 of the BMP Guidance Series in the MRSWMP, the Attachment 4 requirements of the General Permit are cited nearly verbatim, and will be applied by all of the Participating Entities that are subject to Attachment 4. Attachment 4 does not apply to all of the Participating Entities, only those designated in Attachment 5 of the General Permit or as additionally designated by the RWQCB. At the time of preparation of the MRSWMP it was unclear which entities would be subject to Attachment 4. Thus, the language in the BMP Guidance Series was prepared so that all entities determined to be subject to Attachment 4 would comply with the Attachment 4 requirements.</p>
<p>Revise storm water management program to incorporate criteria for prioritizing developments, as well as several pre-determined high priority categories of development</p>	<p>Prioritization of developments is not required by the General Permit. Much of the geographic area covered by the MRSWMP is nearly built-out. There are few parcels of land, except perhaps within the more rural Monterey County Urbanized Areas A, B, and C shown in Figures 3-2 through 3-4 of the MRSWMP, where large development or redevelopment projects that will be subject to the requirements of Minimum Control Measure No. 5 could be expected to occur. Consequently, there is no need to prioritize developments as there might be in other parts of the State where much greater numbers of large developments could be expected to occur.</p>
<p>Adopt ordinance now, based on existing model ordinances, and include development principles adapted directly from Attachment 4</p>	<p>BMP 5-1.a requires each Participating Entity in Year 1 to adopt a comprehensive storm water ordinance based on the model ordinance contained in pages E-67 through E-80 of the MRSWMP, which includes standards for the design, operation, and maintenance of post-construction storm water pollution prevention systems in new developments and redevelopment. The applicability of Attachment 4 requirements is discussed above.</p>

<p align="center">What the "Practical Plan for Pollution Prevention" Requests</p>	<p align="center">How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP</p>
<p>Revise site plan review guidance to include a revised CEQA checklist and criteria for determining appropriate controls</p>	<p>The "Development Projects Plan Review and Inspection Procedures" contained in pages E-119 through E-122 of the MRSWMP address these CEQA issues. In accordance with BMP 5-2.b, these procedures will be used by each Participating Entity in the review of plans for development and redevelopment projects.</p>
<p>Add provisions for inspections by municipal staff, in addition to inspection and self-certification by facility owner</p>	<p>BMP 5-3.b calls for each Participating Entity to "...to inspect projects and/or require self-certification by owner following completion of construction." This is also described in the BMP Guidance Series on pages E-95 and E-120 through E-122 of the MRSWMP.</p>
<p>Revise program to provide for inspections beginning immediately</p>	<p>BMP 5-3.b calls for each Participating Entity to inspect projects beginning in Year 2 and continuing through Year 5 of the Permit. The ordinance that creates the legal authority pertaining to storm water pollution prevention measures in development and redevelopment projects is to be adopted in Year 1.</p>
<p align="center"><u>Conclusion:</u> The BMPs in the MRSWMP are fully responsive to the requests made in the "Practical Plan for Pollution Prevention" and clearly fulfill all of the requirements of the General Permit for this Minimum Control Measure.</p>	

MINIMUM CONTROL MEASURE NO. 6 GOOD HOUSEKEEPING AND POLLUTION PREVENTION FOR MUNICIPAL OPERATIONS	
<u>What the State's General Permit Requires (taken verbatim from the applicable section of the General Permit):</u> <p style="text-align: center;"><i>"The Permittee must:</i></p> <ul style="list-style-type: none"> ▪ <i>Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations</i> ▪ <i>Using training materials that are available from U.S. EPA, the State, or other organizations, the program must include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet building maintenance, new construction and land disturbances, and storm water system maintenance."</i> 	
What the "Practical Plan for Pollution Prevention" Requests	How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP
Revise program to provide for training of specific categories of municipal employees immediately; street sweeping operators, street maintenance crews, park maintenance crews, and municipal construction crews	BMP 6-1.a calls for each Participating Entity to "...train appropriate municipal employees on storm water pollution measures." As explained in pages F-1 through F-33 of the MRSWMP, the training materials are targeted for the following specific audiences: <ul style="list-style-type: none"> ▪ Municipal Employees and Inspectors (F-1 through F-6) ▪ Managers and Supervisors (F-7 through F-13) ▪ Field Crews and Vehicle Maintenance Staff (F-14 through F-20) ▪ Parks, Vehicle Maintenance, and Custodial Personnel (F-29 through F-33) ▪ Streets and Sewer Collection Staff (F-23 through F-28) Thus, these specific categories of municipal employees are included within the targeted audiences.

<p align="center">What the "Practical Plan for Pollution Prevention" Requests</p>	<p align="center">How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP</p>
<p>Adopt ordinance for hazardous materials storage that incorporates existing guidelines for such storage and simultaneously develop guidance</p>	<p>Monterey County's Division of Environmental Health, Hazardous Materials Branch is the Certified Uniform Program Agency (CUPA) for hazardous materials management for the entire MRSWMP geographic area. Under State regulatory provisions, the CUPA conducts inspections, keeps records on hazardous materials storage, and enforces applicable hazardous materials regulations. Thus, there is no need for the Participating Entities to adopt separate hazardous materials ordinances. Under BMP 6-2.a each Participating Entity commits to promptly correct any hazardous materials deficiencies reported to it by CUPA inspectors.</p>
<p>Revise storm water management program to provide for development of procedures for used motor oil disposal within one year</p>	<p>BMP 6-3 calls for each Participating Entity to train its staff in the procedures for proper disposal of used motor and filters, and to ensure that the "Procedures for Storage and Disposal of Used Motor Oil and Used Oil Filters" contained in pages E-148 through E-153 are carried out.</p>
<p>Include a fully developed landscaping and lawn care program, based on existing principles articulated in the MURP or commit to developing program within one year based on these principles</p>	<p>The "Irrigation Runoff Control Procedures" contained in page E-154 of the MRSWMP were developed by the City of Monterey and have been effectively in use in that entity for some time. BMP 6-4.a calls for each Participating Entity to use this program to manage landscaping and lawn care activities to minimize the potential for storm water pollution. BMP 6-4.b calls for each entity to perform spraying (of insecticides and pesticides) only during periods of no rainfall in order to minimize storm water pollution from this source.</p>
<p>Explicitly provide for dechlorination of swimming pools prior to disposal, based on techniques outlined in the MURP</p>	<p>BMP 6-5.a calls for each Participating Entity to use the "Procedures for the Proper Discharge of Water from Swimming Pools" in pages E-155 through E-157 to be followed in order to fully address the issue of dechlorination.</p>

<p align="center">What the "Practical Plan for Pollution Prevention" Requests</p>	<p align="center">How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP</p>
<p>Commit to development of street sweeping program within one year, that is specific regarding frequency and timing of sweeping, access for street sweepers, and disposal of collected waste</p>	<p>Street sweeping schedules for all of the Participating Entities except Del Rey Oaks are included in pages E-158 through E-174 of the MRSWMP. Del Rey Oaks is in the process of contracting for street sweeping services when the MRSWMP was being prepared. Its street sweeping program will be included in the Year 1 Annual Report. BMP 6-6.a calls for each Participating Entity to conduct sweeping on a regular basis in accordance with its street sweeping schedule. All entities dispose of the collected sweepings at an appropriately permitted sanitary landfill.</p>
<p>Explicitly incorporate BMPs for automotive activities from the MURP</p>	<p>BMP 6-7 calls for each of the Participating Entities to implement a series of actions to prevent pollutants from automotive maintenance activities from entering storm drains. BMP 6-7.d calls for each the Participating Entities to inspect their vehicle service facilities annually in accordance with the "Inspection Checklist for Vehicle Service Facilities" contained in pages E-59 of the MRSWMP. Nearly all of these BMPs and the inspection checklist were taken from the MURP.</p>
<p>Explicitly incorporate BMPs for vehicle washing activities from the MURP</p>	<p>BMP 6-8 calls for each of the Participating Entities to implement a series of actions to prevent pollutants from automobile washing activities from entering storm drains. BMP 6-8.e calls for each the Participating Entities to inspect their vehicle washing facilities annually in accordance with the vehicle-washing portion of the "Inspection Checklist for Vehicle Service Facilities" contained in pages E-59 of the MRSWMP. Nearly all of these BMPs and the inspection checklist were taken from the MURP.</p>
<p>Include a Municipal Storm Sewer System maintenance program providing for inspection maintenance, documentation, and disposal of waste materials</p>	<p>BMPs 6-10.b through 6-10.d call for each Participating Entity to perform catch basin and inlet inspections annually, to clean and repair catch basins, inlets, and piping as identified through inspections as needed prior to November 1st (typical start of rainy season) annually, and to re-inspect identified problem areas of debris accumulation during the wet season. BMP 6-10.e calls for each Participating Entity to keep documentation of inspections and cleanings. Although not stated in the BMPs, all of the entities dispose of waste material collected from storm sewer cleaning at a properly permitted sanitary landfill.</p>

<p>What the “Practical Plan for Pollution Prevention” Requests</p>	<p>How This Issue was Addressed in the October 31, 2005 Revised Version of the MRSWMP</p>
<p>Explicitly incorporate BMPs for inspection and cleaning of storm drains from the MURP.</p>	<p>This is duplicative of the item above. Some of the MRSWMP BMPs regarding storm sewer maintenance were taken from the MURP while others were taken from programs developed by other entities and described in the CASQA Handbooks and/or the EPA Menu of BMPs.</p>
<p><u>Conclusion:</u> The BMPs in the MRSWMP are fully responsive to the requests made in the “Practical Plan for Pollution Prevention” and clearly fulfill all of the requirements of the General Permit for this Minimum Control Measure.</p>	