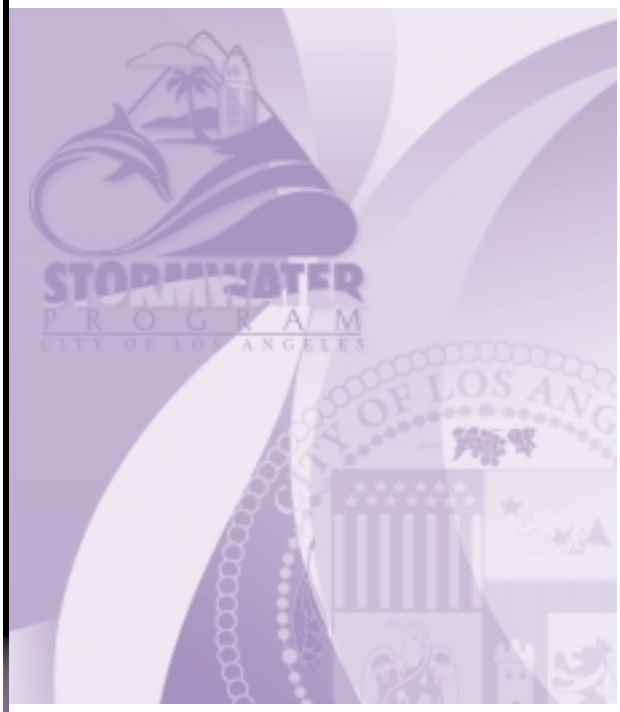
PUBLIC AGENCY ACTIVITIES STORMWATER GUIDE

CITY OF LOS ANGELES

STORMWATER PROGRAM



Introduction

The municipal stormwater National Pollutant Discharge Elimination System (NPDES) Permit (Permit), Order Number 96-054 and NPDES Number CAS614001, issued to Los Angeles County and 85 cities including the City of Los Angeles by the California Regional Water Quality Control Board, Los Angeles Region (Regional Board or RWQCB) on July 15, 1996 contains a requirement for the City to develop and implement a Public Agency Activities Program. [The Permit and the provisions specified in this document are applicable only to facilities and activities of City departments and offices that are not covered in the NPDES General Industrial Permit No. CAS000001, Water Quality Order No. 97-03-DWQ issued by the State Water Resources Control Board].

Section 2.IV.C of the Permit contains requirements specifically for public agency activities, as summarized in Table 1. A copy of the applicable Permit section is included as Appendix A. The Permit requirements are fully enforceable and can be changed only through action by the Regional Board.

Table 1
Permit Requirements – Public Agency Activities

Permit Section	***Requirement (Summary)***	***Compliance Date***
2.IV.B	*Develop and implement a program to reduce stormwater impacts from public agency activities. The program shall include, at a minimum, procedures for the following:*	*Four months after commencement of next fiscal year following Executive Officer approval of model program, but no later than 7/30/99.(1)*
2.IV.C.1	*Sewage systems operations*	
2.IV.C.2	*Public construction activities management*	
2.IV.C.3	*Vehicle maintenance/ material storage facilities management*	
2.IV.C.4	*Landscape and recreational facilities management*	
2.IV.C.5	*Storm drain operation and management*	
2.IV.C.6	*Streets and roads maintenance*	
2.IV.C.7	*Parking facilities management*	
2.IV.C.8	*Public industrial activities (optional)*	
2.IV.C.9	*Emergency procedures*	

(1) Provided that such approval is issued not later than 90 days prior to the commencement of the Permittee's fiscal year.

Implementation activities for each of the nine program components are discussed in the following sections of this program guide. Each City Department is responsible for performing those tasks that are applicable and necessary to be in compliance with the City's NPDES stormwater permit. This includes implementing the applicable procedures and policies to address the activities covered in the Permit, providing the appropriate staff training, keeping records of compliance activities, performing self-assessments, and preparing status reports for the annual report.

Background

The implementation of the NPDES Program, mandated by the 1972 amendments to the Federal Water Pollution Control Act (otherwise called the Clean Water Act), brought about vast improvement in the control of pollutants in point source discharges. However, it has become evident that pollutants from diffuse sources over a wide area, such as urban runoff, are a major contributor to water quality problems. Thus, the focus has now shifted to nonpoint source pollution control.

Because of the intermittent, variable and unpredictable nature of stormwater discharges, the EPA reasoned that the problems caused by stormwater discharges were better managed at the local level through nonpoint source controls such as the use of specific management practices to prevent the pollutants from entering stormwater and urban runoff. These practices are called Best Management Practices (BMPs). The EPA justified its decision by noting that issuing individual NPDES permits for the hundreds of thousands of stormwater point sources in the United States would create an overwhelming administrative burden and would divert resources away from control of industrial process wastewater and municipal sewage, which at the time were more pressing and identifiable environmental problems.

There were a series of legal challenges to the EPA's approach to stormwater pollution abatement and the NPDES permit process as it relates to nonpoint source pollution. As a result of those legal challenges and comments from various municipalities around the country, the NPDES regulations evolved until the EPA promulgated the final stormwater regulations on November 16, 1990. This final regulation establishes requirements for the stormwater permit application process. In implementing these regulations, the EPA and the States will strive to achieve environmental results in a cost effective manner by placing high priority on pollution prevention activities, and by targeting activities

based on reducing risk from particularly harmful pollutants and from discharges to high value waters.

Prior to the issuance of the final stormwater regulations, the Los Angeles City Council adopted an Environmental Quality & Waste Management Committee report (January 24, 1990) authorizing the City Engineer to negotiate an early NPDES stormwater permit. Negotiations between the City, Los Angeles County Department of Public Works, and the Regional Board continued from January 1990 until June 18, 1990 when the Regional Board adopted the early NPDES stormwater permit for Los Angeles County (NPDES Permit No. CA0061654).

The early permit was for a five-year period and expired on June 18, 1995. Negotiations for a new permit were held between the Regional Board staff, the County of Los Angeles, Heal the Bay, and several other cities, including the City of Los Angeles. Various draft versions of the permit were developed and revised from February 1995 through June 1996. On July 15, 1996, the Regional Board adopted the new NPDES stormwater permit (NPDES Permit No. CAS614001) entitled "Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles." This latest permit will expire on July 15, 2001 when a new permit will be adopted.

County Responsibilities

As the Principal Permittee, the County of Los Angeles (County) has various responsibilities in addition to those of the other Permittees. Their primary functions as Principal Permittee include developing model programs, implementing the Countywide monitoring programs, and coordinating and submitting compliance documents.

City Responsibilities

The City must implement all program elements of the Permit by July 30, 1999. As a Permittee, the City has the responsibility to comply with the requirements of the Permit including: development and implementation of stormwater programs based on the model programs; participation in the development of the Countywide Stormwater Management Plan (CSWMP) and Watershed Management Area Plans (WMAPs); and implementation of specific stormwater programs, projects and/or activities which demonstrate compliance with the CWSMP and WMAPs. In addition, the City serves on the Executive Advisory Committee, the model program subcommittees, and three Watershed Management Committees.

Stormwater Ordinance

The City Council of the City of Los Angeles passed an ordinance titled Stormwater and Urban Runoff Pollution Control (Ord. No. 172176) effective October 1, 1998. The objective of this ordinance is to set forth the requirements and prohibitions for dischargers and places of discharge to the storm drain system and the receiving waters necessary to adequately enforce and administer all laws, lawful standards, orders or special orders that provide for the protection, enhancement and restoration of water quality.

In addition, the City Council adopted the Stormwater Pollution Control Measures for Construction Activities Ordinance (Ord. No. 172673) effective July 30, 1999. The objectives of this ordinance are to define and adopt best management practices (BMPs) necessary to control stormwater pollution from sediments, erosion, and construction materials to the maximum extent practicable, place said BMPs in the "Development Best Management Practices Handbook, Part A Construction Activities", and provide legal authority for the City to enforce these requirements.

Stormwater Management Division

The Stormwater Management Division (SMD) of the Bureau of Sanitation is the lead office for the City's Stormwater Management Program. SMD represents the City on stormwater and NPDES stormwater permit issues before the County Department of Public Works and the Regional Water Quality Control Board. In addition, SMD provides technical expertise and guidance to all City departments, bureaus, and divisions to ensure implementation and compliance with the Permit. Furthermore, SMD prepares and transmits an annual report to the County for submittal to the RWQCB and is the responsible agent that certifies that the City is in compliance with all Permit requirements.

City Departments and Bureaus

Each City department or bureau is responsible for implementing the NPDES stormwater permit requirements applicable to their activities. This Public Agency Activities Stormwater Guide (Guide) has been prepared to ensure that the City departments and bureaus are well informed of and in compliance with the Permit requirements that affect their activities.

Each department or bureau will perform the following:

- *certify acceptance of this document*

- *establish and adopt applicable written policies for the program elements*
- *maintain records as required by the Permit*
- *provide staff training*
- *report the status of this program to the Stormwater Management Division*
- *annually certify compliance with all Permit requirements that apply to its department or bureau.*

The Public Agency Activities Program is divided into nine major categories of activities as follows:

- *Sewage Systems Operations*
- *Public Construction Activities Management*
- *Vehicle Maintenance/Material Storage Facilities Management*
- *Landscape and Recreational Facilities Management*
- *Storm Drain Operation and Management*
- *Streets and Roads Maintenance*
- *Parking Facilities Management*
- *Public Industrial Activities (Optional Program)*
- *Emergency Procedures*

There is a section in the Guide for each of the above categories that explains the minimum required procedures that must be adopted and additional procedures that may be considered for adoption and implementation by the departments and bureaus. It should be noted that this document is only a guide. Ultimately, the City departments and offices must comply with the requirements stipulated in the NPDES Permit. Reporting requirements for each program element are included in the Guide to provide data and information that will be used in the annual report. Compliance with Permit requirements will be tracked and monitored by SMD and the Regional Board through the annual reporting process, self-assessments, certifications, SMD audits and inspections, and RWQCB audits and inspections.

Each division in a department or bureau engaged in any of the categories of activities stated above will receive copies of this Guide. Training and implementation within a department or bureau is the department's/bureau's responsibility, however, SMD is available to support department/bureau efforts with technical expertise and guidance in implementing these procedures to meet Permit requirements.

Each department or bureau should have a designated coordinator to keep informed about the NPDES stormwater permit so that he/she can provide

the necessary guidance to implement these procedures. SMD will interact with the coordinators to provide the latest Permit information and to request the necessary compliance reports from the department or bureau.

The following are the recommended steps to implement the elements of this program that apply to each department or bureau.

1) Adopt

The first step toward implementation is to adopt the Guide. A department head or appointed authority must accept and certify that the department will formally adopt and implement the guidance provided in the Guide.

2) Distribute

The second step is to distribute the Guide to the affected divisions within the department with the appropriate transmittal requiring them to begin implementation. The department will make copies of the Guide and distribute these to the appropriate personnel.

3) Train/Develop Awareness

The department must schedule and ensure training for all personnel engaged in activities covered in the Guide. The department must maintain records of the personnel trained so that the status of the training can be reported to the RWQCB.

4) Practice/Implement

The next step is to apply the practices and guidelines to daily activities within the department. Personnel should be informed that they must apply the practices and guidelines that are appropriate to their activities.

5) Assessment/Review

Periodically, the department, along with SMD, will assess and review the practices that the department has applied to its daily activities. They will record any practice or guideline that needs modification or any new practices or guidelines that should be adopted.

6) Update

If needed, and after an assessment and review of the department's activities, the practices and guidelines may be updated by SMD and any changes will be submitted to the department for review and approval. Once approved, the new guidelines should be incorporated into the department's guide and the appropriate employee awareness and training should be provided.

7) Report

The department will need to maintain records and provide reports to SMD. The reporting format and requirements are detailed in the applicable sections of the Guide. Section 8 and Section 9 of the Guide have no reporting requirements at this time. Departments

must maintain such records as are necessary to provide the information that will be requested by the Regional Board. Additionally, records of any required training should be maintained. As part of the annual report, SMD will ask for the number of employees trained for each element. SMD will compile the reports for all City departments and prepare the annual report to the RWQCB. Departmental information for the annual report is due to SMD in July of each year. Departments are responsible for taking the initiative and collecting information in anticipation of a July reporting deadline. SMD will notify departments of specific reporting due dates.

8) Inspection

Voluntary self-assessments and periodic inspections by SMD are important to the success of this program. The inspections will check what practices and guidelines have been adopted and implemented so that the general effectiveness of the program in instilling practices to reduce pollutants in urban runoff can be assessed.

Inspections are specifically required for some elements of the public agency program, such as public construction, and storm drain operation and management. For other activities, no inspections are required but voluntary inspections are encouraged to ensure the effectiveness of the best management practices and compliance with the requirements of the Permit. Additional guidance for inspections is in the various sections of the Guide.

Voluntary self-inspections, performed by department staff, should be held as frequently as deemed necessary to assess BMP effectiveness. Occasional inspections by SMD staff may be made to assess facilities' compliance with Permit requirements. In addition, facilities are subject to periodic inspection by RWQCB staff.

9) Certify

Each department will sign and return a statement of compliance along with the department's required reporting data to SMD in July of each year as part of the proof that the City is doing its part to reduce pollutants in stormwater.

Contact List

City of Los Angeles

Stormwater Program

- *Gary Lee Moore*
  Program Manager (213) 847-6346

- *Morad Sedrak*
  Asst. Program Manager
  (213) 847-6353

- *Steven Nikaido*
  Public Agency Activities (213) 847-4862

Spill Response Agencies

- *Department of Public Works*
  Bureau of Sanitation (800) 974-9794
- *Police Department*
  Hazardous Materials Unit (213) 237-2793
  or (213) 485-4011
- *Fire Department*
  Health/Hazardous Materials Program
  (213) 485-6185

Recycling and Hazardous Waste

- *Hazardous and Toxic Materials Office*
  (213) 580-1023

- *Solid Resources Citywide Recycling Division*
  (213) 847-1444

Illegal Dumping

- *Department of Public Works*
  Bureau of Sanitation (800) 974-9794

Clogged Catch Basin

- *Department of Public Works*
  Bureau of Sanitation (800) 974-9794

County of Los Angeles

Spill Response Agencies

County Fire Dept. (213) 890-4045

Recycling and Hazardous Waste Disposal

County Department of Public Works
Recycling and Household Hazardous

Illegal Dumping

County Department of Public Works
*(800) **3**03-0003*

Clogged Catch Basin

Hotline *(800) 552-5218*

County Department of Public Works
(818) 458-HELP

Section 1
Sewage Systems Operations

1.1 Introduction

1.1.1 Program Goal and Objectives

This program component is applicable to all City departments that maintain and operate the City's sewage collection system. Although sewage systems themselves are not a regular source of stormwater pollution, raw sewage contains pollutants that can pose a serious threat to both human health and the quality of receiving waters if they enter the storm drain system through incidents such as spills, leaks, or overflows. The goal of this program component is to reduce the impact of City-owned sewage system operations on stormwater quality.

The City's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as summarized in Table 1-1.

Table 1-1
Permit Requirements - Sewage Systems Operations

Guide Section	***Requirement (Summary)***	***Permit Section***
1.2.1	*Implement procedures to keep sewage spills or leaks from facilities operated by a Permittee from entering the municipal storm drain system to the maximum extent practicable.*	*2.IV.C.1.a*
1.2.1	*Implement procedures to respond to overflows and investigate complaints.*	*2.IV.C.1.c*
1.2.2	*Implement procedures to identify, repair, and remediate sanitary sewer blockages, exfiltration, overflow, and wet weather overflows from sanitary sewers operated by a Permittee to the municipal storm drain system.*	*2.IV.C.1.b*
1.2.3	*Implement procedures to insure that the Permittee is able to investigate any suspected connections or cross-connections from the sanitary sewer systems to the municipal storm drain system.*	*2.IV.C.1.d*
1.2.4	*Implement procedures to notify public health agencies with discretionary decision authority on beach closures when there*	*2.IV.C.1.e*

	is a threat to public health.	

The objectives of this program component are to:

- *Keep any sewage system overflows or leaks from entering the storm drain system or receiving waters to the maximum extent practicable.*
- *Identify, repair and remediate sewage system blockages, exfiltration and overflows, and implement procedures for investigating suspected cross-connections from the sanitary sewers to the municipal storm drain system.*
- *Respond to overflows and investigate complaints.*
- *Notify public health authorities when there is a threat to public health.*

1.1.2 Facilities Covered by the Permit

Facilities that are covered under this program component include sanitary sewer pipes and pump stations owned and operated by the City. The Bureau of Sanitation (Bureau) maintains and operates most of the sewage collection system in the City of Los Angeles except those within the airport complexes of the Department of Airports, officially known as Los Angeles World Airports (LAWA). Some departments have contractual agreements with the Bureau to manage the sewage systems within their properties. These departments are responsible, through the Bureau, that the requirements of this section are satisfied. This section of the Guide is applicable only to the Bureau of Sanitation and LAWA.

1.2 Program Implementation Elements

1.2.1 Spill/Leak/Overflow Response and Containment and Complaint Investigation

The Bureau of Sanitation has submitted the Sewage Spills Response and Reporting Procedures Plan to the RWQCB. A copy of this plan can be obtained by calling either the Wastewater Collection Systems Division at (213) 485-5892 or SMD at (213) 847-6350. The Bureau will be responsible for implementing the procedures in this plan, where applicable, to contain spills, leaks, and overflows from sanitary sewer pipes, pump stations, and septage disposal facilities in the City of Los Angeles outside of the airport complexes (the Los Angeles International Airport, the Palmdale Airport, the Van Nuys Airport, and the Ontario Airport.) The LAWA will amend their spill response plan to be consistent with the Bureau's Sewage Spills Response and Reporting Procedures Plan.

General guidance on responding to leaks, spills, and overflows is included in Appendix B, Section B.1, and detailed guidance for investigating complaints is provided in the Illicit Connection/Illicit Discharge Elimination Implementation Plan developed by SMD. A copy of the Illicit Connection/Illicit Discharge Elimination Implementation Plan can be obtained by contacting SMD at (213) 847-6350.

1.2.2 Preventive and Corrective Maintenance

The following procedures will be implemented, when feasible, to identify, repair and remediate sanitary sewer blockages, exfiltration, and overflows.

- During routine maintenance and inspection, note the condition of sanitary sewer structures and identify areas that need repair or maintenance.
- Document suggestions and requests for repair and report the information to the appropriate manager or supervisor.
- Prioritize repairs based on the nature and severity of the problem.

Additional guidance on identifying, reporting, and repairing potential sewage system problems is included in Appendix B, Section B.2.

1.2.3 Cross-Connections

The following procedures will be implemented, when feasible, to verify that suspected connections or cross-connections are investigated.

- Educate field staff to recognize suspected cross-connections from the municipal storm drain to the sanitary sewer system during their daily activities.
- Maintain accurate records of both sewer connections and new sewer lines.
- Report suspected cross-connections to the Stormwater Hotline at (800) 974-9794.

Additional guidance on maintaining records is included in Appendix B, Section B.3. Additional guidance on conducting cross-connection and other illicit connection investigations is provided in the Illicit Connection/Illicit Discharge Elimination Implementation Plan.

1.2.4 Public Health Agency Notification

The following procedures will be implemented, when feasible, to notify public health agencies with discretionary decision authority to close beaches when a sewage release may pose a threat to public health.

- Notify the County Department of Health Services, or other local health agency, of the spill location and potential discharge point to the receiving water.

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

- *Notify other agencies as needed to help determine the extent of the threat and document the release.*

The 24-hour spill response telephone numbers for all Permittees are included in Appendix B, Section B.4.

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

Sewage Systems Operations. *[Questions 1 through 7, 11, and 12 are applicable to the Bureau of Sanitation (Wastewater Collection Systems Division-WCSD) and LAWA. Questions 8 through 10 are applicable to SMD and WCSD. Questions 13 through 16 are applicable to all three entities.]*

1. How many miles (approximate) of collection system do you own/operate? _____

2. How many miles of sewers were cleaned? _____

3. How many miles of sewers were repaired? _____

4. How many miles of new sewers were installed? _____

5. How many occurrences of:
blockages occurred / cleaned? _____ / _____
spills/overflow occurred / cleaned? _____ / _____

6. How many of the incidents from #5 above resulted in sewage entering the storm drain system? _____

7. Estimate total gallons discharged from all incidents. _____

8. Were any suspected cross- connections to the storm drain system identified? ___
If yes, how many were investigated? _____
If investigated, how many were eliminated? _____
If not, what prevented the investigation?

_____
_____
_____
_____

9. How many complaints were received and investigated? _____

10. Describe the nature of the majority of the complaints.

_____
_____

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

_____
_____
_____
_____
_____

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

11. *Describe any BMP or revised practices that were used to minimize sewage from entering the storm drain system. For example, addition of sandbags or inflatable dams to maintenance equipment.*

    _____
    _____
    _____
    _____
    _____
    _____
    _____

12. *What were the impacts, if any, of the BMPs implemented?*

    _____
    _____
    _____
    _____
    _____
    _____
    _____
    _____

13. *Summarize the accomplishments of your program during the last year.*

    _____
    _____
    _____
    _____
    _____
    _____
    _____
    _____

14. *Summarize improvements, if any, that will be made to your program during the next year.*

    _____
    _____
    _____

_____
_____
_____
_____
_____

15. *How many of your staff received training that emphasized the impact of their activities on stormwater quality?* _____

16. *Describe the training conducted that emphasized stormwater quality.*
_____
_____
_____
_____
_____
_____
_____
_____

Section 2
Public Construction Activities Management

2.1 Introduction

2.1.1 Program Goal and Objectives

This program component is applicable to all City departments that conduct or contract out public construction activities. The goal of this program is to incorporate, during the design and construction of a public project, best management practices (BMPs) to reduce the discharge of pollutants from public construction sites.

The City's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as described in Table 2-1.

Table 2-1
Permit Requirements – Public Construction Activities Management

Guide Section	***Requirement (Summary)***	***Permit Section***
2.2.1	*Implement stormwater management requirements for the design and construction of public facilities consistent with the requirements and time lines specified for private development in Part 2.III.A and III.B.*	*2.IV.C.2.a*
2.2.2 (optional)	*Implement procedures to seek coverage, as an option, under this Order for construction activity with a disturbed area of five acres or more (Phase 1, 40 CFR 122.26) which is undertaken by or on behalf of the Permittee.*	*2.IV.C.2.b*

The objectives of this program component are:

- *Implement requirements consistent with the requirements and timelines specified for private development projects. The primary objectives of that program are to:*
  - *effectively prohibit non-stormwater discharges, and*

- *reduce the discharge of pollutants from stormwater systems to the maximum extent practicable.*
- *Select and incorporate appropriate construction control measures for stormwater quality management at construction sites.*
- *Conduct an inspection program, including enforcement procedures as necessary, to verify that the construction control measures are implemented and performed effectively throughout the construction period.*

2.1.2 Facilities Covered by the Permit

This program element applies to public projects to be constructed in the City of Los Angeles and are owned or operated by the City. Public construction projects are those that involve construction activities and can include, but are not limited to, site development, building, roadway, drainage, utility and other infrastructure projects. However, as defined in Attachment D of the Permit, "Construction activity does not include routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility, nor does it include emergency construction activities required to immediately protect public health and safety."

2.2 Program Implementation Elements

2.2.1 Planning and Design Requirements

Public projects will continue to undergo the California Environmental Quality Act (CEQA) review and approval process. Through the CEQA process, stormwater pollution prevention measures will be required, when appropriate. These measures are to be incorporated in the final design of the project. A draft list of stormwater urban mitigation measures is available through SMD [(213) 847-6350] and the Department of Planning [(213) 473-5653].

2.2.2 Construction Activity Requirements

This element of the City's Public Agency Activities Program is based upon the City's Development Best Management Practices Handbook Part A: Construction Activities (Handbook) and the Stormwater Pollution Control Measures for Construction Activities Ordinance (Ord. No. 172673). All public construction activities will be required to implement stormwater pollution prevention measures consistent with the requirements contained in the Handbook. Plans and specifications must incorporate stormwater pollution prevention measures during project construction.

For public construction projects, the appropriate BMPs shall be proposed by the design/contracting office relative to the anticipated construction activities and the pollutants generated by those activities. The building/grading permit cannot be issued until the proposed BMPs, stormwater pollution prevention plan (SWPPP) or wet weather erosion control plans (WWECP), whichever is required, is included in the submittal of the project plans and has been reviewed by the Department of Building and Safety.

The City's plan checking/inspection process for the proposed grading/building projects is based on the following criteria:

- *Stormwater Exempt Projects – These are public projects that pose minimum risks of stormwater pollution. Examples of exempt projects include routine maintenance to maintain original grade line or hydraulic capacity, emergency activities required for public safety, interior remodeling with no outside exposure of materials, mechanical permit work, electrical permit work, and sign permit work. Exempt projects are not subject to stormwater pollution control requirements.*

- *Construction Projects – These are public projects on construction sites with less than two acres of disturbed soil. Construction Projects will be required to implement the minimum requirements, i.e., year-round measures for construction materials control and erosion and sediment control.*

- *Construction Priority Projects - These are public projects on construction sites having between two and five acres of disturbed soil. Included in this category are projects within environmentally sensitive areas and projects located on Designated Hillside Areas with soil disturbance during the rainy season. An environmentally sensitive area is defined as any land designated as an Significant Ecological Area on the latest City of Los Angeles Department of Planning Significant Ecological Area Map. A Designated Hillside Area is defined as any land designated as a Hillside Area on the latest Bureau of Engineering Basic Grid Map No. A-13372. In addition to the requirements of Construction Projects, developers/contractors of Construction Priority Projects will be required to prepare a Local SWPPP.*

  A local SWPPP is a plan prepared by the developer/contractor that includes a site map; an identification of construction/contractor activities that could cause pollutants in the stormwater, i.e., concrete work, equipment storage/maintenance, waste disposal,

etc.; and a description of measures or practices to control these pollutants, i.e., best management practices (BMPs) to control stormwater pollution from construction activities. For further guidance on the preparation of a local SWPPP, refer to the Development Best Management Practices Handbook Part A: Construction Activities, available from SMD at (213) 847-6350.

- *Projects Covered Under the NPDES General Construction Permit – These are projects with five acres or more of disturbed soil. In addition to the requirements of Construction Projects, developers/contractors of will be required to prepare a State SWPPP, file a Notice of Intent (NOI) to comply with the California General Construction Activity Stormwater Permit with the State Water Resources Control Board.*

2.2.3 Inspection

The City will maintain its current inspection program by the Department of Public Works, the Department of Building and Safety, the Department of Water and Power and others with the inclusion of stormwater pollution control requirements.

2.2.3.1 Inspection Requirements

When conducting an inspection, the Inspector will observe the public construction site for compliance with the minimum water quality protection requirements established in the local stormwater pollution prevention plan. Inspection of all active priority projects will be conducted at least once during the rainy season.

Inspection of erosion control measures will continue to be conducted by the Bureau of Contract Administration to verify implementation of provisions included in the wet weather erosion control plan.

Because regular self-inspections are required for private development projects, regular self-inspection must be made a condition of public construction projects as part of the project plans and specifications. Regular self-inspections by the developer/contractor are required particularly during the rainy season. The purpose of the self-inspections is to ensure that BMPs are properly implemented and functioning effectively and to identify maintenance and repair needs. Self-inspections must be performed before and after every rainfall that produces observable runoff and at 24-hour intervals during extended rainfall events.

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

2.2.4 Procedures to Seek Coverage under the Municipal Permit (Optional)

For construction projects greater than five acres, coverage may be obtained under the Municipal Permit if the following procedures are followed:

- *Notify the Executive Officer of the Regional Board of the construction activity.*
- *Use a checklist of construction activity BMPs using Best Available Technology/Best Control Technology (BAT/BCT) criteria for public construction activity as defined by the General Construction Permit.*
- *Verify implementation of construction activity BMPs.*
- *Require a State SWPPP to be prepared and retained on site for each project.*
- *Report annually to the Executive Officer of the Regional Board as part of the City's Annual Report under the Municipal Permit on the effectiveness of State SWPPP's for public construction activity sites, and certify compliance with the requirements in this program.*

Guidance on conducting these procedures is included in Appendix C.

City of Los Angeles Public Agency Activities Program
Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

Public Construction Activities

A: Planning and Design (applicable to all departments sponsoring the project)

1. *How many projects were categorized as exempt?* _____
   How many projects were categorized as construction? _____
   How many projects were categorized as construction priority? _____
   How many projects were greater than 5 acres? _____

B. Construction (applicable to all appropriate City Inspectors)

Please submit a copy of the inspection forms used. These forms (Attachments C, D, & E are attached) were adopted in the Development Construction Program.

ATTACHMENT C

Check one: Private Development ____ Public Construction Project ____

INSPECTION LOG

The site shall be inspected before and after storm events with 0.5 inches or greater of actual precipitation predicted with a probability of 40% or greater and documented on the Construction Site Inspection Checklist. Incidents of noncompliance must be reported to the Engineer.

Date	**Inspector**	**Type of Inspection**			**Observations** (if post-storm inspection, note size of storm in inches)
		Routine	Pre-storm	Post-storm	

ATTACHMENT D

Check one: Private Development ____ Public Construction Project ____

CONSTRUCTION SITE LOCAL SWPPP
INSPECTION CHECKLIST

Inspected By: .....
Project: .....
Contractor: .....
Date: .....

Type of Inspection

_ Construction Priority Project (Complete Section 1, 2, and 3, if applicable)
_ Observed Violation of Exempt Project (Complete Sections 1 and 3)
_ Observed Violation of Construction Project (Complete Sections 1 and 3)
_ Observed Violation of General Permit Project (Complete Sections 1 and 3)

Section 1	**YES**	**NO**	**N/A**
1 Are material handling and storage areas reasonable clean and free of spills, leaks, or other deleterious materials?			
2. Are all equipment storage and maintenance areas reasonably clean and free of spills, leaks, or other deleterious materials?			
3. Are all materials and equipment covered?			
If you answered ANO≅ to any of the questions above, describe on Section 3 any corrective actions that will be required to remedy the problem and when corrective actions are to be completed.			
Section 2	**YES**	**NO**	**N/A**
4. Has a local SWPPP been prepared for the project?			
5. Has the Local SWPPP been implemented?			
6. Are the BMPs implemented under the Local SWPPP effective at meeting the minimum construction material and waste management requirements?			
If you answered ANO≅ to any of the questions above, describe on the next page any corrective actions that will be required to remedy the problem and when corrective actions are to be completed.			

Section 3

Describe the Type of Violation

_ Off-site discharge of sediment
_ Off-site discharge of other pollutants
_ Substandard SWPPP or inadequate SWPPP on site
_ Substandard Sediment Controls
_ Substandard Erosion Controls
_ Substandard Site Management Practices
_ Substandard Material and Waste Management Practices

Corrective Actions Needed and Schedule for Completion _____

ATTACHMENT E

Check one: Private Development ____ Public Construction Project ____

CONSTRUCTION SITE EROSION CONTROL PRACTICES INSPECTION CHECKLIST

Inspected By:.....
Project: .....
Contractor: .....
Date: .....

Type of Project
Type of Inspection

_ Construction Priority Project (Complete Section 1, 2, and 3, if applicable)
_ Observed Violation of Exempt Project (Complete Sections 1 and 3)
_ Observed Violation of Construction Project (Complete Sections 1 and 3)
_ Observed Violation of General Permit Project (Complete Sections 1 and 3)

Section 1	**YES**	**NO**	**N/A**
1 Are sediment control BMPs installed downslope of all disturbed areas of the site?			
2. Are sediment control BMPs in proper repair and free of excessive sediment buildup?			
3. Are site entrance and exit points free of tracked sediment?			
If you answered ANO≅ to any of the questions above, describe on the next page any corrective actions that will be required to remedy the problem and when corrective actions are to be completed.			
4. Are erosion control BMPs in place at upstream of these location?			
5. Are erosion control BMP in proper repair?			
6. Are areas not actively under construction stabilized and access properly restricted from these areas?			
If you answered ANO≅ to any of the questions above, describe on the next page any corrective actions that will be required to remedy the problem and when corrective actions are to be completed.			

Section 2	YES	NO	N/A
7. Has a WWECP been prepared?			
8. Has the WWECP been implemented?			
9. Are the BMPs implemented under the WWECP effective at meeting the minimum sediment and erosion control requirements?			
If you answered ANO≅ to any of the questions above, describe on the next page any corrective actions that will be required to remedy the problem and when corrective actions are to be completed.			

Section 3

Describe the Type of Violation

_ Off-site discharge of sediment
_ Off-site discharge of other pollutants
_ Substandard SWPPP or inadequate SWPPP on site
_ Substandard Sediment Controls
_ Substandard Erosion Controls
_ Substandard Site Management Practices
_ Substandard Material and Waste Management Practices

Corrective Actions Needed and Schedule for Completion _____

Section 3
Vehicle Maintenance/Material Storage Facilities Management

3.1 Introduction

3.1.1 Program Goal and Objectives

This program component is applicable to all City departments that own or operate vehicle maintenance/material storage facilities as described in the Permit and as detailed in Section 3.1.2. Activities at these facilities may generate waste, spills and leaks that could potentially reach the storm drain system and receiving waters in stormwater runoff or as non-stormwater discharges. The goal of this program is to ensure stormwater pollution prevention practices are considered when conducting activities at municipal facilities.

The City's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as summarized in Table 3-1.

Table 3-1
Permit Requirements - Vehicle Maintenance/Material Storage Facilities Management

Guide Section	***Requirement (Summary)***	***Permit Section***
3.2.1	*Develop pollution prevention plans for public vehicle maintenance/material storage facilities which have the potential to discharge pollutants into stormwater.*	*2.IV.C.3.a*
3.2.2	*Implement BMPs to improve site-specific pollutant control including but not limited to good housekeeping practices; material storage control; vehicle leaks and spill control; illicit discharge control; training for employees on proper outdoor loading/unloading of materials; vehicle and equipment washing area control; regular maintenance of treatment structures such as sumps, oil/water separators, or equivalent; and proper waste handling and disposal.*	*2.IV.C.3.b*

The objectives of this program component are to:

- *Identify and evaluate sources of pollutants from public vehicle maintenance/material storage facilities that may affect the quality of stormwater discharges from the facility.*
- *Identify and implement site-specific best management practices to reduce or prevent pollutants in stormwater discharges.*

3.1.2 Facilities Covered by the Permit

Section 2.IV.C.3.a of the Permit defines public vehicle maintenance/material storage facilities as "...any Permittee-owned or operated facility or portion thereof that:

i. Conducts industrial activity, operates equipment, handles materials, and provides services similar to federal Phase 1 facilities;

ii. Performs fleet vehicle maintenance on ten or more vehicles per day including repair, maintenance, washing, and fueling;

iii. Performs maintenance and/or repair of heavy industrial machinery/equipment; and

iv. Stores chemicals, raw materials, or waste materials in quantities that require a hazardous materials business plan or a Spill Prevention, Control, and Counter-measures (SPCC) plan."

These types of facilities will require stormwater pollution prevention plans (SWPPPs). Site-specific SWPPPs have been developed for the City's 179 vehicle maintenance and material storage facilities. Stormwater Management Division staff has worked together with several City agencies (Fire – 103 facilities, General Services – seven facilities, Harbor – one facility, Police – 18 facilities, Recreation & Parks – 13 facilities, Sanitation – 13 facilities, Street Lighting - one facility, Street Services – 19 facilities, and Transportation – four facilities) to select best management practices that are appropriate to prevent or mitigate pollution generated from specified activities at the 179 sites. The Department of Water and Power will be developing the plans for their SWPPP facilities (approximately 25).

In the future, existing facilities may change their functions or operations, and new facilities may be placed in operation. Guidance on determining if these facilities require SWPPPs and on how to prepare a SWPPP can be found in Appendix D.1 or by contacting SMD at (213) 847-6350.

3.2 Program Implementation Elements

3.2.1 Stormwater Pollution Prevention Plan

A stormwater pollution prevention plan (SWPPP) will be developed and implemented, where applicable, for public vehicle maintenance/material storage facilities, as defined in Section 2.IV.C.3.a of the Permit, to minimize the potential for pollutant discharges to the storm drain system. A model stormwater pollution prevention plan and guidance on how to develop and implement the plan are provided in Appendix D.2.

3.2.2 Best Management Practices for Site-Specific Control

As part of the pollution prevention plan, BMPs must be selected and implemented, where applicable, that are appropriate to prevent or mitigate pollution generated from the specific activities at the site. A list of appropriate BMPs and guidance for BMP selection are provided in Attachment D2 of Appendix D.

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

Vehicle Maintenance/Material Storage Facilities Management

1. *What is the total number of vehicle maintenance/material storage facilities owned or operated by this department?* _____

2. *Were any structural BMPs installed in any of the facilities?* _____

3. *Describe the structural BMPs installed and their effect on minimizing stormwater pollution.*

   _____
   _____
   _____
   _____

4. *List and rate (from 1-10, where 1= poor and 10 = good) the BMPs used in all facilities within this department.*

BMP	*Rating*
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

5. *Did any of the department facilities experience a major spill?* _____

6. *How many of the major spills caused non-storm water discharges to enter the storm drain system?* _____

7. *What caused the major spill?*

   _____

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

_____
_____
_____

8. *What steps/procedures were adopted to minimize the recurrence of a major spill/ non-storm water discharge from entering the storm drain system after such a spill?*

_____
_____
_____
_____

9. *Summarize the accomplishments of your storm water program during the last year (for example, trained x number of employees, reduced the number of spills, adopted new procedures to protect storm water, etc.)*

_____
_____
_____
_____

10. *Summarize improvements, if any, that will be made to your storm water program during the next year (for example, purchased new absorbents or drip pans, training, moved storage indoors, upgraded fueling tanks, etc.)*

_____
_____
_____
_____

11. *How many employees received training that emphasized the impact of their activities on storm water quality?*

_____
_____
_____
_____

12. *Have you updated or changed any of your SWPPPs this reporting year (if yes, list the facilities)?*

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

_____
_____
_____
_____

Section 4
Landscape and Recreational Facilities Management

4.1 Introduction

4.1.1 Program Goal and Objectives

This program component is applicable to all City departments that own and operate recreational facilities. Maintenance practices at parks and recreation facilities generally include fertilizer and pesticide applications, vegetation maintenance and disposal, swimming pool chemical maintenance and draining, and trash and debris management. All of these maintenance practices have the potential to contribute pollutants to the storm drain system. If improperly managed, potential pollutants can be transported in runoff to the storm drain system and subsequently discharged to receiving waters. The goal of the program for landscape and recreational facilities management is to ensure stormwater pollution prevention practices are considered when conducting operation and maintenance activities.

The City's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as summarized in Table 4-1.

The objectives of this program component are to:

- *Minimize the discharge of pesticides, herbicides and fertilizers to the storm drain system and receiving waters.*
- *Prevent the disposal of landscape waste into the storm drain system.*
- *Minimize trash, debris and other pollutants from entering City-owned recreational water bodies.*
- *Discharge municipal swimming pool water in a manner that will not contribute pollutants to receiving waters.*

Table 4-1
Permit Requirements - Landscape and Recreational Facilities Management

Guide Section	Requirement (Summary)	Permit Section
4.2.1	Implement procedures for application of pesticides, herbicides, and fertilizers that will include: a list of approved pesticides and selective and environmentally responsible uses, product and application information, application equipment use and maintenance, and record keeping.	2.IV.C.4.a
4.2.1	Implement procedures to minimize stormwater pollution by pesticides and fertilizers used for landscape maintenance, including the utilization of Integrated Pest Management (IPM) techniques to the maximum extent practicable.	2.IV.C.4.b
4.2.1	Implement BMPs to reduce exposure of fertilizers and pesticides to stormwater during storage, to include as applicable: storage indoors or under cover on paved surfaces, secondary containment, reduction in storage and handling of hazardous materials, and regular inspection of storage areas.	2.IV.C.4.e
4.2.1	Implement guidelines to schedule irrigation and fertilization to minimize chemical application during the wet season, to terminate chemical application during storm events, and to minimize overwatering and nutrients/pesticides entrainment.	2.IV.C.4.f
4.2.2	Implement procedures to prevent the disposal of landscape waste into the municipal storm drain system.	2.IV.C.4.c
4.2.3	Implement procedures to encourage retention and planting of native vegetation to reduce water, fertilizer, and pesticide needs.	2.IV.C.4.d
4.2.4	Implement procedures to manage discharges of municipal swimming pool water into the municipal storm drain system, including: dechlorination practices, proper disposal of clean-out waters, and piping of filter backwash to the sanitary sewer.	2.IV.C.4.g

Table 4-1
Permit Requirements - Landscape and Recreational Facilities Management

Guide Section	Requirement (Summary)	Permit Section
4.2.5	Implement BMPs to minimize trash, debris, and other pollutants from entering recreational water bodies, including: routine trash collection along, on, and/or in water bodies, where feasible; and public outreach to educate the public about the impacts of illicit disposal.	2.IV.C.4.h

4.1.2 Facilities Covered by the Permit

Landscape and recreational facilities include, but are not limited to:

- Parks
- Golf courses
- Swimming pools
- Riding trails
- Recreational water bodies
- Picnic areas
- Sports fields
- Landscaped areas in parking lots

4.2 Program Implementation Elements

4.2.1 Pesticide, Herbicide and Fertilizer Management

4.2.1.1 Application and Record Keeping

The following procedures will be implemented, when applicable, to ensure that pesticides, herbicides and fertilizers are properly applied and handled to minimize their exposure to stormwater. Application and handling procedures will be in compliance with federal, state and county regulations, as follows:

- Apply and handle pesticides and herbicides and keep detailed records in accordance with existing state regulations (California Title 3, Division 6, Pesticides and Pest Control Operations). The regulations cover a list of approved chemicals, product and application information, equipment use and maintenance procedures, and record keeping. A list of approved pesticides,

herbicides, and fertilizers must be included with the detailed records.
- *Apply and handle fertilizers in strict accordance with the label directions.*

Guidance on applying and handling these materials and a summary of the state regulations are provided in Appendix E.

4.2.1.2 Minimizing the Use of Pesticides and Fertilizers

The following pest control strategies will be implemented, when applicable, to emphasize the use of a hierarchy of controls, with a preference for mechanical controls (e.g., mowing) and biological controls (e.g., beneficial insects, pheromones) before chemical controls (e.g., pesticides, herbicides). This practice is often referred to as Integrated Pest Management (IPM), a pest management practice that considers the entire ecosystem when determining potential pest control strategies.

- *Use mechanical control of vegetation whenever possible, such as mowing with tractor-type or pushmowers and hand-cutting with gas- or electric-powered weed trimmers.*
- *Use hand-weeding where practicable.*
- *Consider the use of beneficial insects to control pests as part of a Preventive Maintenance Program.*
- *Incorporate the above practices into application contracts.*

Guidance on minimizing product use is provided in Appendix E.

4.2.1.3 Storage and Inspection

The following BMPs will be implemented, when applicable, to handle pesticides and fertilizers in a manner that minimizes their exposure to stormwater. Storage and inspection will be in compliance with federal, state and county regulations.

- *Store materials in enclosed sheds or buildings or under cover on an impervious surface.*
- *Provide secondary containment around materials if stored outdoors or if material from a spill could flow outdoors.*
- *Keep only the minimum amount of hazardous materials on site.*
- *Periodically check areas for spills, leaks, or unsafe storage methods.*

Guidance on storage and a summary of the state regulations are provided in Appendix E.

4.2.1.4 Irrigation and Fertilization

The following procedures will be implemented, when applicable, during irrigation and fertilization applications to minimize the discharge of pollutants that can enter the storm drain system:

- *Avoid over-watering landscaped areas, especially when irrigating after fertilizer/pesticide applications. Adjust watering locations and amounts to minimize non-stormwater runoff.*
- *Avoid chemical applications during the wet season to minimize the amount of pollutant runoff in stormwater.*
- *Avoid applying chemicals during storm events.*

4.2.2 Landscape Waste

Landscape waste consists of clippings, cuttings and droppings of leafy and woody materials. Grass clippings generated from the practice of grasscycling (described below) that are managed in accordance with grasscycling procedures do not constitute landscape waste. The following procedures, where practicable, will be implemented by City employees and required of City contractors. They are designed to assure that exposed material and accumulated sediment and trimmings will be handled in an environmentally sensitive manner to prevent their entry into the storm drain system and reduce the generation of waste:

- *Grasscycling should be avoided when runoff from stormwater or irrigation may transport grass clippings to the storm drain system. For additional guidance on proper composting and grasscycling practices, call the City of Los Angeles' Citywide Recycling Division at 213-847-1444.*
  - *Grasscycling – when lawns are mowed, grass clippings may be left on the lawn where they will decompose rapidly, adding water and nutrients to the soil. Grasscycling can be practiced by removing the mower bag and letting the flap cover the opening; installing a mower retrofit kit; or using a mulching mower.*
- *Landscape waste should be disposed of by either composting it on-site, preferably in closed containers, or taking it to a City-approved off-site composting location, or taking it to a permitted landfill. Permitted landfills should be used only after all opportunities for composting and grass cycling have been exhausted.*
- *Place temporarily stockpiled material away from watercourses, and berm or cover stockpiles to prevent material releases to the storm drain system.*

4.2.3 Native Vegetation

The following procedures will be implemented, when applicable, to retain and plant native vegetation to reduce water, fertilizer and pesticide needs.

- *Determine existing native vegetation features (location, species, size, function, and importance) and consider the feasibility of protecting them.*
- *Consider elements such as their effect on drainage and erosion, hardiness, maintenance requirements, and possible conflicts between preserving vegetation and the resulting maintenance needs.*
- *Where feasible, retain and/or plant selected native vegetation whose features are determined to be beneficial.*

4.2.4 Municipal Swimming Pools

The following procedures will be implemented, when applicable, to manage discharges of municipal swimming pool water:

- *When practicable, discharge filter backwash water and chemically treated water to the sanitary sewer.*
- *If discharging to the storm drainage system, dechlorinate the water through mechanical means (such as letting the water sit for several days without adding chlorine) or chemical means (such as by adding sodium bisulfite).*
- *Neutralize all other chemicals in discharges, such as acid wash residue, before discharging to the storm drain system.*
- *Incorporate the above practices into maintenance contracts.*

Guidance on dechlorination practices is provided in Appendix E.

4.2.5 Recreational Water Bodies

Beaches, picnic areas, lakes, and ponds receive a large number of visitors and may collect a large amount of litter, debris and other pollutants. To minimize the amount of potential pollutants that reach the water body, the following procedures will be implemented, when feasible:

- *Provide and maintain trash receptacles to hold refuse generated by the public.*
- *Collect trash and debris from bins and along water bodies to minimize the amount of trash and debris that may contact the water.*
- *Collect trash and debris from within waterbodies where feasible.*
- *When necessary, increase collection during peak visitation months (generally June, July and August).*

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

Landscape and Recreational Facilities Management

1. *What practices were used to minimize stormwater pollution by pesticides and fertilizers -application guidelines, storage measures, scheduling, or other? Compare BMPs for effectiveness in minimizing employee exposure to chemicals and minimizing the potential of chemicals to enter the storm drain system.*

   _____
   _____
   _____
   _____

2. *What practices were used to minimize trash and debris in recreational water bodies? Compare BMPs for effectiveness and cost (manpower or other measurable).*

   _____
   _____
   _____
   _____

3. *Describe any structural BMPs you have installed, such as clarifiers, filters, fueling canapies, storage sheds, etc.? Include costs. Describe runoff and what success was attained in minimizing contamination because of the newly installed structural BMPs.*

   _____
   _____
   _____
   _____

4. *Summarize the accomplishments of your storm water program during the last year (such as changes in policy that might affect water*

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

quality, new equipment or procedures that reduce the exposure of runoff to pollutants, training or employee awareness programs, etc.).

_____
_____
_____
_____

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

5. *Summarize improvements, if any, that will be made to your storm water program during the next year (planned training, new procedures, less hazardous chemicals, etc.).*

   _____
   _____
   _____
   _____

6. *How many employees received training that emphasized the impact of their activities on storm water quality?*

   _____
   _____
   _____
   _____

Section 5
Storm Drain Operation and Management

5.1 Introduction

5.1.1 Program Goal and Objectives

This program component is applicable to all City departments that own and operate a storm drain system. The storm drain system functions primarily to collect and convey surface runoff to receiving waters during storms in order to prevent flooding. It is a common activity to maintain the storm drain system so that it functions hydraulically as intended during storms. The goal of this program is to reduce the impact of storm drain operation and maintenance activities on stormwater quality.

The City's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as summarized in Table 5-1.

Table 5-1
Permit Requirements - Storm Drain Operation and Management

Guide Section	***Requirement (Summary)***	***Permit Section***
5.2.1	*Implement BMPs for inlet maintenance to the maximum extent practicable, including but not limited to: inspection and cleaning of catch basins between May 1 and September 30 of each year; additional cleaning of catch basins, as necessary, between October 1 and April 30; record keeping of catch basins cleaned; and recording of the overall quantity of catch basin waste collected.*	*2.IV.C.5.a*
5.2.2	*Implement BMPs for storm drain maintenance to the maximum extent practicable, including but not limited to: proper disposal of material removed; removal of trash and debris from open channel storm drains at least annually between May 1 and September 30 of each year; and surveillance for debris buildup in open channels during the rainy season.*	*2.IV.C.5.b*
5.2.3	*Implement a waste management program to include: procedures to identify problem areas of illicit discharges for regular inspection, procedures to minimize to the maximum extent practicable the discharge of contaminants*	*2.IV.C.5.c*

	during municipal storm drain system cleanup to maintain optimum channel capacity, and a review of current maintenance activities to assure that appropriate stormwater BMPs are being utilized.	

The objectives of this program component are to:

- *Inspect and clean catch basins annually and keep appropriate records.*
- *Remove trash and debris annually from open channels and properly dispose of these materials to prevent them from being washed to receiving waters.*
- *Report prohibited non-stormwater discharges observed during the course of normal daily activities so they can be investigated, contained and cleaned up or eliminated.*
- *Review maintenance activities to verify that appropriate storm water BMPs are being utilized.*

5.1.2 Facilities Covered by the Permit

Facilities covered under this program include storm drain systems owned and operated by the City.

5.2 Program Implementation Elements

5.2.1Catch Basins

The following BMPs will be implemented for inspection and cleaning of catch basins and associated record keeping.

- *Inspect and clean catch basins between May 1 and September 30.* [1]
- *Conduct additional cleaning as needed between October 1 and April 30.* [1]
- *Record the following information when inspecting or cleaning catch basins:*
  - *Dates inspected or cleaned*
  - *Locations of catch basins inspected or cleaned*
  - *Overall amount of material removed (estimated in either volume or dry weight)*

Guidance on conducting maintenance activities is provided in Appendix F, Section F1. Examples of forms that may be used to collect information and additional guidance are provided in Appendix F, Section F.2.

5.2.2 Storm Drains

The following BMPs will be implemented, to the maximum extent practicable, to remove trash and debris from improved open channels and to dispose properly any material removed during storm drain maintenance activities. The City may be required to obtain approvals and permits for channel maintenance in order to implement these BMPs.

---

[1] *Specifically required in the Permit (Section IV.C.5)*

- *Remove trash and debris from open channels at least once per year between May 1 and September 30.* [1]
- *During the rainy season, check open channels for debris buildup.* [2]
- *Properly dispose of all material removed during storm drain cleaning and maintenance at an approved landfill or recycling facility.* [2]

Guidance on conducting maintenance activities is provided in Appendix F, Section F.1.

5.2.3 Waste Management

5.2.3.1 Illicit Discharge Identification

Illicit discharges may be encountered in any part of the storm drain system. Recommended procedures to identify problem areas and guidance on identifying, reporting and responding to illicit discharges are discussed in the City's Illicit Connection/Illicit Discharge Elimination Implementation Plan, available from SMD at (213) 847-6350.

5.2.3.2 Minimization of Contaminant Discharge

The following procedure will be implemented, to the maximum extent practicable, to minimize the amount of contaminants discharged when conducting storm drain maintenance activities:

- *Properly handle materials and dispose of waste removed during maintenance activities in a manner that will not release the material to the storm drain system, or in any other way contaminate stormwater runoff.*

Guidance is provided in Appendix F, Section F.3.

5.2.3.3 Maintenance Activity Review

The following procedures will be implemented, when feasible, to verify

that appropriate stormwater best management practices are incorporated into maintenance activities:

- *Review current maintenance activities.*
- *Evaluate if they directly or indirectly contribute pollutants to receiving waters.*
- *Revise procedures or adopt additional BMPs as necessary to reduce the contribution of pollutants to receiving waters during maintenance activities.*
- *Educate employees on revised procedures during regular safety and tailgate meetings.*

---

[2] *Specifically required in the Permit (Section IV.C.5)*

City of Los Angeles Public Agency Activities Program
Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

Storm Drain Operation and Management

1) Approximately how many catch basins were cleaned?

_____
_____
_____

2) Estimate the total number of tons of debris removed from all catch basins?

_____
_____
_____

3) Were all catch basins cleaned between May 1 and Sept. 30? _____
a) If not, how many catch basins were not cleaned? _____
b) Explain why these catch basins were not cleaned.

_____
_____
_____

4) Describe any revised practices or additional BMPs that were implemented to minimize the discharge of contaminants during maintenance activities? (For example, different methods of stockpiling or waste containment, or revised herbicide use procedures for vegetation removal from channels, use of catch basin inserts, etc.) Evaluate effectiveness of revised practices or additional BMPs. Evaluate cost versus effectiveness.

_____
_____
_____

5) Summarize the accomplishments of your storm water program during the last year (such as the adoption of new policies or procedures, record keeping, maintenance programs, training, etc.)

_____
_____
_____

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

6) *Summarize improvements, if any that will be made to your storm water program during the next year (planned training, adoption of policies or procedures, new equipment, new or more staff for storm water activities, etc.)*

_____

_____

_____

7) *How many employees received training that emphasized the impact of their activities on storm water quality?* _____

Section 6
Streets and Roads Maintenance

6.1 Introduction

6.1.1 Program Goal and Objectives

This program component is applicable to all Departments that own and/or operate streets and roads. Streets and roads may collect litter and debris from nearby activities, as well as from vehicular traffic. They also require routine maintenance that may generate waste materials. The goal of this component is to reduce the impact of City street and road operations and maintenance on stormwater quality.

The City's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as summarized in Table 6-1.

The objectives of this program component are to:

- *Reduce street litter and debris that are potential pollutants when transported into the storm drain system.*
- *Minimize the discharge of pollutants associated with the maintenance of streets and roads.*

6.1.2 Facilities Covered by the Permit

Facilities covered under this program include streets and roads owned and operated by the City.

6.2 Program Implementation Elements

6.2.1 Sweeping

The following procedures will be implemented:

- *Sweep curbed streets at a targeted frequency of at least monthly[1]; and*
- *Where feasible, sweep areas that generate significant refuse more frequently than monthly[1].*

Guidance for establishing a more frequent sweeping schedule in areas generating

[1] *Specifically required in the Permit (Section IV.C.6)*

Table 6-1
Permit Requirements - Streets and Roads Maintenance

Guide Section	***Requirement (Summary)***	***Permit Section***
6.2.1	*Implement a program to sweep curbed streets at a targeted frequency of at least monthly, and where feasible, more frequently in areas generating significant refuse.*	*2.IV.C.6.a*
6.2.2	*Implement a streets and roads maintenance program of BMPs for existing saw-cut management and paving practices, to include but not be limited to: avoidance during wet weather to the extent feasible, and material storage away from drainage areas to prevent stormwater pollution or other equally effective BMPs.*	*2.IV.C.6.b.i*
6.2.2	*Implement a streets and roads maintenance program for management of concrete materials and wastes, including but not limited to: washout of concrete trucks off or on site in designated areas and not into storm drains, open ditches, streets, or catch basins; material storage under cover, away from drainage areas or other equally effective BMPs; and avoidance of excess mixing of concrete or cement on site.*	*2.IV.C.6.b.iv*
6.2.3	*Implement a streets and roads maintenance program including good housekeeping practices to insure proper management of any wastes that are generated.*	*2.IV.C.6.b.ii*
6.2.4	*Implement a streets and roads maintenance program including collection, transport, and disposal of maintenance waste at appropriate disposal facilities in accordance with applicable federal, state, and local laws and regulations.*	*2.IV.C.6.b.iii*
6.2.5	*Implement a streets and roads maintenance program including employee training to promote a clear understanding of the potential for maintenance activities to pollute stormwater, and to identify and select appropriate BMPs.*	*2.IV.C.6.b.v*

significant refuse is provided in Appendix G, Section G.1.1. In implementing the street-sweeping program, the City must also comply with the South Coast Air Quality Management District (SCAQMD) Rule 1186, which addresses particulate matter emissions from paved and unpaved roads and livestock operations. Additional information on SCAQMD Rule 1186 is included in Appendix G, Section G.1.2.

The two common types of sweepers used are vacuum sweepers and mechanical broom/brush sweepers. Permittees have flexibility to use either type of sweeper except as regulated by SCAQMD Rule 1186. Guidance on operating street sweepers at optimum efficiency is provided in Appendix G, Section G.1.3.

6.2.2 Material Management

Street and road maintenance operations may include saw cutting, paving, or the use of concrete and asphaltic materials. Source control BMPs to address each of these activities individually are described below.

6.2.2.1 Saw-Cut Slurry

The following procedures will be implemented:

- *Avoid saw-cut activities during wet weather, to the extent feasible.* [2]
- *Store saw-cutting materials away from drainage areas to prevent stormwater pollution, or implement other equally effective BMPs.* [2]
- *Clean up spills from equipment and activities and dispose properly, when practicable.*

Other BMPs that may be implemented during saw-cut activities are listed in Appendix G, Section G.2.1.

6.2.2.2 Paving

The following procedures will be implemented:

- *Avoid paving activities during wet weather, to the extent feasible.* [2]
- *Store paving materials away from drainage areas to prevent stormwater pollution or implement other equally effective BMPs.* [2]
- *Avoid cleaning paving equipment on-site, to the maximum extent practicable; restrict equipment cleaning to an appropriate designated location, to the maximum extent practicable.*

Other BMPs that may be implemented during paving activities are listed in Appendix G, Section G.2.2.

6.2.2.3 Concrete

The following procedures will be implemented:

- *Wash concrete trucks off site or in designated areas on site, such that there is no discharge of concrete washwater into storm drains, open ditches, streets, catch basins, or other stormwater conveyance structures.* [2]
- *Store concrete materials under cover, away from drainage areas, or implement other equally effective BMPs.* [2]
- *Avoid mixing excess amounts of concrete or cement on site.* [2]

Other BMPs that may be implemented for the management of concrete materials and wastes are provided in Appendix G, Section G.2.3.

_____

[2] *Specifically required in the Permit (Section IV.C.6)*

6.2.3 Good Housekeeping

Good housekeeping practices will be implemented, to the maximum extent practicable, to properly manage wastes that are generated during streets and roads maintenance activities. [3]

Good housekeeping BMPs that may be implemented are provided in Appendix G, Section G.3.

6.2.4 Maintenance Waste Disposal

Procedures will be implemented, when feasible, to collect, transport, and dispose of maintenance waste at appropriate disposal facilities in accordance with applicable federal, state, and local laws and regulations. Optional disposal options include the reuse and recycling of appropriate materials.

6.2.5 Employee Training

Employee training programs will be carried out such that staff who conduct streets and roads maintenance activities will:

- *be educated about the potential pollutants that may be released as a result of maintenance activities,*
- *be educated regarding procedures and specific BMPs to be implemented during street sweeping, road maintenance, waste disposal, as well as regarding general good housekeeping practices, and*
- *know how to effectively implement all applicable procedures and BMPs while conducting streets and roads maintenance activities.*

Guidance for training employees who are charged with the responsibility for implementing streets and roads maintenance activities is provided in Appendix G, Section G.4.

---

[3] Specifically required in the Permit (Section IV.C.6)

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

Streets and Roads Maintenance

1) *Were all curbed streets swept at least monthly?* ___ *Yes* ___ *No*

2) *Approximately, how many total tons (estimated) of debris were removed annually by street sweeping?* _____

3) *Approximately how many miles of curbed streets within your jurisdiction?* _____

4) *Was the targeted frequency for street sweeping achieved?*___ *Yes* ___ *No*

5) *To achieve the targeted frequency, were any changes required, such as:*
   a) *Additional equipment* ___ *Yes* ___ *No*
   b) *Additional staff* ___ *Yes* ___ *No*
   c) *Additional contractors* ___ *Yes* ___ *No*
   d) *Reduced sweeping in some areas to achieve targeted frequency in others*
   ___ *Yes* ___ *No*

6) *If the targeted sweeping frequency was not achieved, what prevented it from being achieved?*
   _____
   _____
   _____

7) *What other measures will be taken to achieve the targeted frequency in the future?*
   _____
   _____
   _____

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

8) During the past year, what practices or BMPs were used to manage materials and wastes associated with saw-cut activities, paving activities, and concrete pouring activities?

_____
_____
_____

9) What obstacles, if any, were encountered in trying to better manage these activities for the protection of the storm drain system and receiving waters?

_____
_____
_____

10) During the past year, were any new housekeeping policies or practices implemented by streets and roads personnel? If so, describe.

_____
_____
_____

11) Describe the training provided to streets and roads maintenance personnel during the past year.

_____
_____
_____

12) Did employees think the training was useful and beneficial?

_____
_____
_____

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

13) Will the training be modified for the upcoming year?

_____
_____
_____

14) Summarize the accomplishments of your program during the last year.

_____
_____
_____

15) Summarize improvements, if any, that will be made to your program during the next year.

_____
_____
_____

Section 7
Parking Facilities Management

7.1 Introduction

7.1.1 Program Goal and Objectives

As part of their stormwater quality management plan, all City departments that own or operate parking lots with more than 25 parking spaces that are located in areas potentially exposed to stormwater must have a parking facilities management plan. The goal of this component is to reduce the impact of these parking facilities on the quality of stormwater discharges and receiving waters.

The City's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as summarized in Table 7-1.

Table 7-1
Permit Requirement - Parking Facilities Management

Guide Section	Requirement (Summary)	Permit Section
7.2	Implement a parking facilities management plan that includes sweeping or other equally effective measures to remove debris from Permittee-owned parking lots with more than 25 parking spaces that are located in areas potentially exposed to stormwater.	2.IV.C.7

The objective of this program component is to remove debris from parking facilities to reduce the amount of material that comes into contact with stormwater.

7.1.2 Facilities Covered by the Permit

Facilities covered by this section include City-owned parking lots with more than 25 parking spaces that are located in areas potentially exposed to stormwater. This may include public parking areas and municipal parking lots at facilities such as City Hall.

7.2 Program Implementation Elements

The following procedures will be implemented to the maximum extent practicable to remove debris from parking facilities:

- *Conduct regular sweeping or other equally effective measures to remove debris from City-owned parking lots covered by this program.*
- *Place trash cans in strategic locations within the parking areas.*

Additional information on sweeping, including types of sweeping equipment and guidance for sweeper operation, is provided in Appendix G. Additional guidance for cleaning parking lots and implementing other BMPs at parking facilities is included in Appendix H.

City of Los Angeles Public Agency Activities Program
Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

Parking Facilities Management

1) *Describe any measures that were implemented to reduce potential stormwater pollution from parking lots during the past year.*

_____
_____
_____
_____
_____
_____

2) *How were the new measures implemented?*

_____
_____
_____
_____
_____

3) *Summarize the accomplishments of your program during the last year.*

_____
_____
_____
_____
_____

4) *Summarize improvements, if any, that will be made to your program during the next year.*

_____
_____
_____
_____

City of Los Angeles Public Agency Activities Program Annual Report

The following are representative of the questions that will be asked to provide SMD with the information necessary to prepare the Annual Report (to the County). This questionnaire is presented at this time for information only. Additional guidance will be provided later, when specific reporting requirements have been finalized.

———————————————————————————————

Section 8
Public Industrial Activities (Optional Program)

8.1 Introduction

8.1.1 Program Goal and Objectives

Industrial activities, whether private or public, have the potential to contribute pollutants to stormwater runoff. Many industrial facilities (Phase 1 facilities) are subject to the California General Industrial Activities Storm Water Permit (General Industrial Permit) for control of stormwater pollution. The goal of the General Industrial Permit is to reduce the impact of industrial facilities on stormwater quality. The goal of this component of the Public Agency Activities Program is to procedurally simplify and reduce the cost of the City's compliance for its own industrial facilities by providing the option to obtain coverage under the Los Angeles County municipal stormwater permit (Permit) in lieu of the General Industrial Permit.

If a Phase 1 facility owned or operated by a City department desires to obtain coverage under this Permit, the facility must meet the requirements of the Public Industrial Activities component, as summarized in Table 8-1.

Table 8-1
Permit Requirements - Public Industrial Activities

Guide Section	***Requirement (Summary)***	***Permit Section***
8.2	*Implement procedures to seek coverage, as an option, under this Order for Phase I industrial facilities, which are owned or operated by a Permittee.*	*2.IV.C.8.a*

The objective of this program component is to:

- *Comply with all requirements and conditions contained in the General Industrial Permit.*

8.1.2 Facilities Covered by the General Industrial Permit

Facilities subject to the General Industrial Permit are those facilities that are listed by category in 40 Code of Federal Regulations (CFR) Section 122.26(b)(14):

i. Facilities subject to stormwater effluent limitations guidelines, new source performance standards, or toxic pollutant effluent standards (40 CFR Subchapter N)
ii. Manufacturing facilities
iii. Mining and oil and gas facilities
iv. Hazardous waste treatment, storage, or disposal facilities
v. Landfills, land application sites, and open dumps that receive industrial waste
vi. Recycling facilities
vii. Steam electric generating facilities
viii. Transportation facilities
ix. Sewage treatment plants
x. Certain facilities if industrial materials are exposed to stormwater

Typical publicly-owned industrial facilities include airports, publicly-owned treatment works (POTWs), vehicle maintenance facilities, and landfills. The impact of the regulations will vary depending on the type of facility. Most, if not all, airports have obtained coverage under an individual or group NPDES permit. POTWs are affected only if the facility's stormwater runoff is not directed to the treatment facility or contained in some other way on site. Landfills are affected only if they receive or have received waste from industrial facilities covered by the Phase 1 regulations.

Corporation yards and the associated vehicle maintenance activities are technically not covered by the General Industrial Permit except for certain major vehicle maintenance facilities servicing a transportation fleet (i.e., bus system). However, under the Los Angeles County Permit, City departments must develop pollution prevention plans for these facilities. See Section 4 of this document for more information on a program for corporation yards.

8.2 Program Implementation Elements

Some, if not all, publicly-owned or operated industrial facilities are likely already covered (if the municipality has filed for coverage) by the General Industrial Permit or USEPA's Multi-sector Permit. Rather than file for separate General Industrial Permit coverage or renewal,

equivalent coverage may be obtained for these facilities under the Los Angeles County Permit if the following procedures are implemented:

- *Notify the Executive Officer of public industrial facilities owned or operated by the City as defined in the General Industrial Permit.*
- *Develop a checklist of BMPs using Best Available technology/Best Control Technology (BAT/BCT) criteria for public industrial facilities.*
- *Develop a procedure to verify implementation of industrial facility BMPs.*
- *Prepare and retain site-specific SWPPPs.*
- *Report to the Executive Officer of the Regional Board, as part of the City's Annual Report prepared by SMD, under the municipal stormwater Permit on the effectiveness of the SWPPPs and the results of the facility monitoring programs at public Phase 1 industrial facilities.*
- *Certify compliance with the requirements of the Permit.*

Guidance is provided in Appendix I.

Section 9
Emergency Procedures

9.1 Introduction

9.1.1 Program Goal And Objectives

As part of their stormwater quality management program, each department must include a component addressing emergency repairs of essential public services and infrastructure, and response to natural disasters. The goal is to reduce the impact of emergency response activities on receiving waters, to the maximum extent possible, without compromising public health and safety.

The City's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as summarized in Table 9-1.

Table 9-1
Permit Requirement - Emergency Procedures

Guide Section	***Requirement (Summary)***	***Permit Section***
9.2	*Implement procedures for addressing emergency repairs of essential public services and infrastructure and responding to natural disasters.*	*2.IV.C.9*

The objectives of this program component are to:

- *Recognize that public health and safety are the highest priority when conducting emergency response activities.*
- *Protect surface water quality by incorporating appropriate BMPs into emergency response activities to the maximum extent possible.*

9.2 Program Implementation Elements

While responding to emergency situations and natural disasters such as, but not limited to, earthquakes, fires, floods, landslides, or windstorms, it is recognized that the highest priority for the City is public health and

safety. The following procedures will be implemented, where applicable, to address receiving water quality during emergency repairs:

- *During emergency response and repair activities, BMPs to reduce impacts to the storm drain system and receiving waters will be considered and implemented to the extent that such measures do not compromise public health and safety.*
- *After initial emergency response or emergency repair activities have been completed and essential public services have been restored, implement all appropriate BMPs as described in Sections 2 through 8 when performing additional repairs, clearing conveyance structures, repairing or rebuilding infrastructure, etc.*
- *As needed, coordinate with governmental agencies including, but not limited to, the Los Angeles County Department of Public Health, Los Angeles Regional Water Quality Control Board, California Department of Toxic Substances Control, and the California Office of Emergency Services.*

BMPs that may be considered and other guidance on emergency procedures are provided in Appendix J.

APPENDICES