



## **INSPECTION ACTIVITIES**

**City of Brentwood  
2008-2009**

## INSPECTION ACTIVITIES

### QUALITATIVE RESULTS

**Municipality:** City of Brentwood

**Permit Year:** (2008/2009)

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#### **Introduction:**

The City of Brentwood's ("City") surge of commercial growth within the past several years has tempered due to the economic decline. However, the commercial downturn is not quite as severe as the residential market. Most of the growth continues to be experienced along Lone Tree Way, Sand Creek Road and Balfour Road.

It continues to be a challenge to implement scheduled inspections of active "Priority 1" facilities for commercial/industrial businesses. The implementation of these inspections is primarily hindered by the staff time necessary to perform quality assurance inspections of recently constructed facilities. Targeted inspections mainly focused on restaurants, auto dealerships, and automotive repair shops of varying sizes.

At each inspection, City staff distributed general educational material about stormwater pollution and Best Management Practices ("BMP") targeted at their industry; and conducted onsite outreach to these priority businesses to explain the goals of the City in conjunction with the Contra Costa County Clean Water Program. The City's goal to reduce non-stormwater and tainted stormwater discharges to the City's storm drain system was well understood at each inspection and there was a great amount of support for the Stormwater Program. Due to the positive responses while conducting these inspections, we believe that the City's objective of expecting relatively benign inspection reports and minimal callouts for non-stormwater discharges or threats to the City's storm drain system is being achieved.

In previous years, the City was primarily reactive to stormwater inspections, responded to a commercial/industrial business only after receiving complaints such as backed up sewer laterals. Staff would respond to ensure that the storm drain system was protected from any overflow from the business. While on site, staff verbally explained the Stormwater Program and distributed written BMPs. Three (3) years ago, the City began a proactive inspection approach to commercial/industrial businesses in the City. While our inspections continue to be dominated by reactive visits due to commercial growth and staffing limitations, the goal of the City's inspection program is focused on working one-on-one with all commercial/industrial businesses to ensure compliance.

The task of developing a proactive inspection program for new and existing commercial/industrial businesses is assigned to David Mullaney, Wastewater Operations Manager for the Public Works Department. David Mullaney is charged with developing a prioritized inspection program to conform to the City's current staffing

resources for fats, oil and grease (“FOG”). His goal for the current year is to develop and implement inspections and refine performance standards for all commercial businesses located in the City. This program is being shared with the Code Enforcement Officer until the program is rooted.

Varied Operations staff attends the Commercial/Industrial Ad-Hoc Advisory Work Group depending on the specialty target items being addressed. These meetings are now conducted on a quarterly basis. The City is adapting the Inspection Plan to meet the specifics for the City of Brentwood. City staff from the Wastewater Division regularly attends many of the committee meetings and training sessions presented by the Contra Costa County Clean Water Program and continues to be involved with many of the activities concerning stormwater runoff during the construction process.

## **Implementation & Evaluation:**

### **Industrial and Commercial Business Inspection Program**

Last year the list of priority commercial/industrial businesses such as auto dealerships, retail gas stations, and automotive repair shops that are located within the City was refined to incorporate recently constructed and occupied facilities. These were identified as businesses having the greatest potential of discharging the pollutants of concern (“POC”) to the City’s stormwater conveyance system. These POCs include mercury, copper and hydrocarbons.

The inspection form currently being utilized by the City was taken from the Model Commercial/Industrial program that was developed by the Commercial/Industrial Ad-Hoc Advisory Work Group. The inspection form was tailored to meet the multiple needs of the Inspection Plan and to the particular commercial/industrial businesses located in the City. The inspection form will continue to be refined as part of the Inspection Plan to ensure that our commercial/industrial businesses are being monitored and inspected properly. The written Inspection Plan is used as a guide to outline specific steps the City will take to conduct effective facility inspections.

The high priority facility inspections identified last year as a goal were not completed; however, staff did conduct twenty-five (25) new business inspections. Call-out response visits and new facility occupancy inspections were conducted as well. There were a total of 325 inspections and/or maintenance verifications completed as of June 30, 2009. Our goals continue to be hindered by the influx of new commercial businesses opening up in the City, overwhelming staff resources.

The Inspection Plan’s ultimate goal is to inspect all identified/targeted businesses within its jurisdiction at least once every five (5) years. However, the main goal for this year’s Inspection Plan is to complete all “Priority 1” inspections initially identified and to conduct the second year re-inspections for all other commercial/industrial businesses. Additionally, staff will enter the results of any violations noted into the database for any further activity. Table 2-1 of the Inspection Plan describes specific business types that are subject to inspection at more frequent intervals based on several factors. These

factors include, but are not limited to, high personnel turnover rates, facility location to sensitive water bodies, and high volume of potentially hazardous substances used on a regular basis.

Three (3) types of inspections will be conducted: routine inspections, priority inspections and “call-out” inspections. Routine inspections will be conducted at identified/targeted businesses at a minimum of once every five (5) years after the initial inspection has been conducted. If a business shows evidence of active non-stormwater pollutant discharges during a routine inspection it will be re-categorized to a “Priority 1” inspection, which will require at least one inspection within the following year. Once compliance is achieved the identified commercial/industrial business will be placed on a five (5) year inspection cycle. “Call-out” inspections are conducted within 24 hours on an as needed basis following a report of a non-stormwater discharge or pollutant exposure. Table 2-3 of the Inspection Plan describes the types of inspections that are performed.

### **Code Enforcement Activities**

The Code Enforcement Officer is involved in enforcement, reporting and follow-up of all call-out inspections. Depending upon the severity of the discharge, the Code Enforcement Officer, in conjunction with the City’s Stormwater Control Coordinator, will identify the proper type of recommendation and/or enforcement that is needed for each situation. Enforcement actions and follow-ups are reported in our inspection and enforcement database. Staff continues working with Code Enforcement in supporting the enforcement of stormwater violations. When a violation that warrants enforcement is recognized during a commercial/industrial business inspection the item is referred to Code Enforcement for follow-up. Table 2-4 of the Inspection Plan details the minimum enforcement procedures.

### **Non-Stormwater Discharges**

The types of non-stormwater discharges most prevalent from businesses inspected this year include grease, fats, oil, general food waste and trash. During these facility inspections, the outdoor areas revealed evidence of poor housekeeping. Notices and educational material were given to help emphasize compliance and prevent further discharges by uninformed facility staff. At the time of inspection, all BMP pamphlets are provided to all food service and auto facility related businesses (Refer to attachment “IN-1” for information pamphlets). Documenting these repeat offenders has helped in eliminating discharges through education and proactive inspections of the activities.

### **Inspector Training Activities**

Several staff members from the City of Brentwood attended inspection training during the reporting period.

### **Notice of Intent Inspection Effort**

Staff annually reviews its business license database by Standard Industrial Code (SIC), Notice of Intent (“NOI”) listings to keep Identified/Targeted Business listings current.

### Other Activities

Public Works staff continues to complete plan checks to verify that all current City ordinances for the discharge of stormwater are addressed and that stormwater systems convey stormwater runoff only. Additionally, staff has continued to be responsible for signing-off certificates of occupancy for new commercial/retail developments in the City. These on-site inspections include verifying that all storm drain systems and stormwater treatment devices have been installed per approved submittals, the site and system is cleaned, no standing water remains, the site is ready for operation, and a maintenance program has been established. In many cases, this allows City staff to share BMPs with the business. These inspections must occur prior to signing-off on the permit of occupancy. Public Works staff requires that all stormwater treatment systems be dry and free of any and all construction site debris. This thorough cleaning must be completed before site occupancy sign-off.

Staff has developed an informational database of both website and printed information to give to commercial/industrial businesses. This information will help with the development of the required BMPs for meeting stormwater goals for these identified commercial/industrial businesses.

### **Modifications:**

The City of Brentwood will intensify and/or add inspection performance standards as more commercial/industrial sites are completed and develop a table for future tracking of POCs found during inspections and as dictated by the soon to be adopted Municipal Regional Permit ("MRP").

### **Fiscal Year 2009/2010 Goals:**

1. Complete "Priority 1" inspections of all identified businesses (new businesses coming on board monthly).
2. Conduct annual re-inspection for all other "Priority 1" businesses from permit year 2007/2008 (primarily only problem areas have received re-inspections).
3. Identify responsible owner(s) of all Stormwater Control facilities for placement and GPS on the City Map Room (many new businesses coming on board monthly).
4. Develop a funding mechanism to support the commercial/industrial inspection program (continued challenge).
5. Continue to educate business owners located within the City limits; (i.e. Vehicle Service Facilities, Food Service Facilities, Community Pools, Landscapers, Hardware Facilities, Hotel Inns, Dry Cleaners, Misc. Others). The City is planning to host an anti-pollution and maintenance awareness workshop for "Priority 1" and other interested businesses in a similar format to our annual construction BMP workshops held during the past several years.
6. Develop a calendar of inspections for Food Service Establishments (many new businesses coming on board annually).
7. Evaluate program priorities on the basis of pollutants of concern, with less emphasis on activity-based prioritization (ongoing approach).

8. Emphasize trash reduction efforts in compliance with Provision C.10 of the pending Municipal Regional Permit (“MRP”).

These goals, when achieved as milestones of the City’s Commercial/Industrial Inspection Performance Standard Category will provide a positive gauge of our program’s effectiveness. These goals will be modified, as necessary, based upon the requirements of the MRP.

## INSPECTION ACTIVITIES – QUANTITATIVE RESULTS

Description	Industrial/ NOI	Commercial			Misc. <sup>(2)</sup>	Total
		Restaurants	Vehicle Service Facility	Other <sup>(1)</sup>		
<b>INSPECTION SUMMARY</b>						
Number of Facilities scheduled for Inspection	0	0	0	0	0	0
Number of Facilities Inspected	1	14	3	15	292	325
Number of Routine Facility Inspections	2	13	2	8	0	25
Number of Priority Facility Inspections	0	0	0	0	0	0
Number of Call-out Inspections	2	1	2	4	0	9
Number of Follow up Inspections	1	4	2	5	0	12
<b>ENFORCEMENT</b>						
Total Number of Enforcement Actions	10	45	17	56	10	138
Number of Notices of Violation (NOV) Issued	0	0	0	0	0	0
Number of Warning/Pollutant Exposure Notices (WN/PEN) issued	0	0	0	0	0	0
Number of Fines Levied	0	0	0	1	0	1

Description	Industrial/ NOI	Commercial			Misc. <sup>(2)</sup>	Total
		Restaurants	Vehicle Service Facility	Other <sup>(1)</sup>		
Number of Referrals	0	0	0	0	0	0
<b>BUSINESS EDUCATION &amp; OUTREACH</b>						
Number of Educational Materials Distributed	0	14	3	15	0	32
<b>INSPECTOR TRAINING</b>						
Number of Inspector Training Sessions						2
Number of Inspectors Trained						2

(1) Nursery, golf course, grocery, retail gas outlet.

(2) Mobile surface cleaners, corporation yards, contractor's yards, call out to residential.

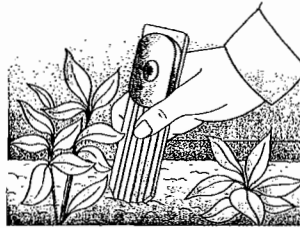
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What vehicle service shops can do to protect water quality in the Bay and Delta



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# Water Pollution Prevention

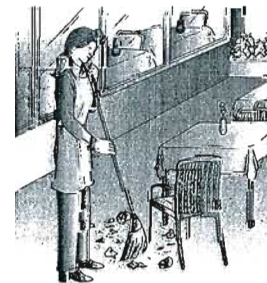


Tips to protect water quality and keep your food service facility clean



# Sugerencias para la prevención de la contaminación del agua

# TIPS



Para proteger la calidad del agua y mantener sus instalaciones alimenticias limpias

