

What to Expect in C.4, C.5, C.12, and C.13 from the Reissued Municipal Regional Permit (MRP 2.0)

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Reissuance of Municipal Regional Permit (MRP)

- Current MRP Expired November 30, 2014
- Received Letter from San Francisco Regional Water Quality Control Board (Water Board) Staff Extending MRP
- Discussions among Water Board Staff, MRP Permittees, Municipal Managers, Stormwater Program Managers, and Consultants since July 2013 to Discuss MRP Reissuance (i.e. MRP 2.0)
- Administrative Draft of MRP 2.0 Released in February 2015
- Meetings among Water Board Staff, MRP Permittees, and Others in February, March, and April 2015
- Comments Provide to Water Board Staff in March and April 2015

Reissuance of Municipal Regional Permit (MRP)

- Tentative Order for MRP 2.0 Expected to be Released on-May 11 with 60-Day Comment Period
- Water Board to Hold Two Public Workshops on Tentative Order of MRP 2.0 on June 10 and July 8 2015
- MRP 2.0 Slated for Adoption on October 14, 2015 Water Board Meeting
- Effective Date of MRP 2.0 ~ January 2016

East Contra Costa Municipal Stormwater Permit

- Issued by the Central Valley Regional Water Quality Control Board
- Applies to Antioch, Brentwood, Oakley and Unincorporated Contra Costa County (Eastern Third)
- Largely Mirrors MRP with noted exceptions
- Central Valley Permit Expires September 1, 2015
- Central Valley Water Board Will Most Likely Extend Current Permit until MRP 2.0 Is Adopted
- Reissued Central Valley Permit Anticipated to Mirror MRP 2.0, again with noted exceptions

MRP 2.0/Central Valley Municipal Stormwater Permit

- C.4 - Industrial and Commercial Site Controls
- C.5 - Illicit Discharge Detection and Elimination
- C.12 – PCBs Control – MRP Only But Not Really**
- C.13– Copper Controls – MRP Only



C.4 Industrial and Commercial Site Controls

C.4 - Reorganized under MRP 2.0, created new section (C.4.d) on inspections most of which had been included elsewhere in C.4 in MRP 1.0

C.4.a	Legal Authority for Effective Site Management	
C.4.b	Business Inspect Plan (BIP)	<ul style="list-style-type: none">• Annual update to BIP explicitly required• BIP should include mechanism to identify/incorporate newly opened businesses warranting inspections• BIP should include list of facilities scheduled for inspection for the respective fiscal year• Maintain database of business inventory• Submit inventory with Annual Report

C.4 Industrial and Commercial Site Controls

C.4.c	Enforcement Response Plan (ERP)	<ul style="list-style-type: none">• Description of the Permittees procedures from discovery of the issue through confirmation of corrective actions• ERP to include scenarios for escalating enforcement• Timely correction (within 10 days) of <u>Potential</u> and Actual Discharges• <u>Greater review of SWPPPs*</u>
C.4.d	Inspections	<ul style="list-style-type: none">• Inspection and Recordkeeping• Submit annually number of inspections, enforcement actions (all and resolved within 10 days), frequency and type of discharges per category, facilities requiring coverage under Industrial General Permit

*No SWPPPs, ~~Inadequate SWPPPs~~, Not Implementing SWPPPs

C.4 Industrial and Commercial Site Controls

C.4.e	Staff Training	<ul style="list-style-type: none">• Annual training for inspectors• Topics include: urban runoff pollution prevention, inspection procedures, illicit discharge detection and elimination (IDDE), appropriate BMPs, <u>BIP</u> and <u>ERP</u>• Submit with annual reports dates of training , topics covered, percentage of stormwater inspectors and <u>IDDE inspectors</u> attending training
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C.5 – Illicit Discharge Detection and Elimination (IDDE)

C.5 – Reorganized, greater documentation of illicit discharges, more reporting on mobile businesses

C.5.a	Legal authority to prohibit and control IDDE	
C.5.b	ERP	Same as outlined in C.4.c including timely correction (10 days) of all <u>potential</u> and actual discharges
C.5.c	Spill and Dumping Complaint Response	<ul style="list-style-type: none">• Amend spill response flowchart to identify positions responsible for receiving, investigating, and abating complaints including outside agencies and their contacts• By June 30, 2016, Permittee's website must include phone number for reporting spills and dumping.• In 2016 and 2019 Annual Reports, provide web address, phone number, screen shot of web page, and report on how web address and phone number are publicized.

C.5 – Illicit Discharge Detection and Elimination

C.5.d	Tracking and Case Follow-Up	<ul style="list-style-type: none">• Maintain the 1-800-No-Dumping telephone line• For tracking of IDDE, database will include:<ul style="list-style-type: none">➤ Date and time of complaint➤ Type of pollutant,➤ Status (potential or actual)➤ Date and time investigation started and abated➤ Whether entered storm drain or receiving water➤ Type of enforcement➤ Response time from call to abatement• Report annually<ul style="list-style-type: none">➤ Number of discharges,➤ Number that reached storm drains/receiving waters➤ Number and percentage that were resolved in 10 days➤ Summary of major types of discharges and complaints
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C.5 – Illicit Discharge Detection and Elimination

C.5.e	Control of Mobile Sources	<ul style="list-style-type: none">• Continue to implement program• Annually update mobile business inventories• Detailed reporting in 2016 and 2019<ol style="list-style-type: none">1. Minimum standards and BMPs/business type, and in 2019, any new BMPs for additional businesses2. Enforcement strategy that specifically addresses the unique characteristic of mobile businesses3. List outreach events since 20094. Provide # of inspections of mobile businesses5. Provide # and types of enforcement actions6. List of mobile cleaners operating within the Permittee's jurisdiction7. Report on countywide or regional activities
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C.5 – Illicit Discharge Detection and Elimination

C.5.f	MS ₄ Map	<ul style="list-style-type: none">• Deleted reporting on screening and/or routine surveys, problems found, etc.• In 2016 and 2019 Annual Reports, Permittees must describe how they publicize MS₄ maps and make them available either electronically or in hard copy
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C.12 PCB Controls

C.12 – Significantly reorganized, MRP 1.0 focus on evaluating control measures to reduce PCBs, MRP 2.0 focus on implementing actions to reduce PCB loads

C.12.b	Assess PCB Load Reductions from Stormwater	<ul style="list-style-type: none">• Submit by certain date (April 2016?) methodology and rationale to assess PCBs load reductions achieved through <u>PCB source control</u> (i.e. property referral to Water Board), stormwater treatment, etc.
C.12.f	Manage PCB-Containing Materials and Wastes during Building Demolition and Renovation Activities	<ul style="list-style-type: none">• In 2016 and 2017, develop <u>tracking tool for potential PCB-containing structures</u>• Provide training to relevant staff as needed to comply with this sub-provision

C.13 Copper Controls – MRP Only

C.13 – Deleted Vehicle Brake Pads & Copper Pollutant Impact Uncertainties, additional reporting in remaining sections

C.13.a	Manage Waste from Architect. Copper	<ul style="list-style-type: none">• Continue to require BMPs, report on permitting & enforcement activities• In 2016, certify legal authority to prohibit discharge of wastewater from architect. copper to storm drains• In 2016, report how architectural copper features are addressed through the issuance of building permits
C.13.b	Manage Discharge from Pools, Spas, etc.	<ul style="list-style-type: none">• Report on permitting & enforcement activities• In 2016, certify legal authority to prohibit discharge from pools, spas, etc.
C.13.c	Industrial Sources	<ul style="list-style-type: none">• Identify facilities likely to use copper, inspect for proper BMPs, etc.

Questions?

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