

Santa Clara Valley Urban Runoff Pollution Prevention Program

**CONDITIONALLY EXEMPTED
DISCHARGES**

Classification and Control Measures



June 15, 2000

Task SC 16-22

August 29, 2000

John West
Regional Water Quality Control Board
1515 Clay St., Suite 1400
Oakland, CA 94612

Subject: Transmittal of Conditionally Exempted Discharges Report

Dear John:

Enclosed please find a copy of the Santa Clara Valley Urban Runoff Program's report entitled *Conditionally Exempted Discharges: Classification and Control Measures* ("CED Report") dated June 15, 2000. The final report was approved by the Management Committee at its June 15, 2000 meeting and distributed in the Management Committee handout packet. You should have received a copy of the handout packet; however, we are also submitting the report to you separately with this letter.

The CED Report is submitted in compliance with Provisions C.5.b. and C.5.c of the Program's NPDES permit. Provision C.5.b. lists 12 specific non-storm water discharges which the Co-permittees are not required to prohibit if they are identified as not being sources of pollutants or if appropriate control measures to minimize adverse impacts are developed and implemented. In order to exempt these discharges from the non-storm water discharge prohibition, the Co-permittees are required under Provision C.5.c. to:

- Demonstrate that each discharge is not a source of pollutant to receiving waters;
- Identify the circumstances in which the discharges are not sources of pollutants; or
- Describe and implement appropriate control measures to the maximum extent practicable to minimize the adverse effects of the discharge.

The CED Report stresses the Regional Board's preference for reclamation of conditionally exempted discharges whenever possible, or discharge to the local POTW (if allowable) as a second option. In cases where these options are not feasible, the report provides appropriate control measures for allowing discharges to storm drains and creeks.

The CED Report was developed by an ad hoc task group, with assistance from Program staff. A draft report was submitted to the Management Committee and Regional Board staff (you) in October, 1998 for review and comment. Your comments were addressed in a revised draft dated May 5, 1999. Additional work on the report was performed during FY 99-00 to address

Mr. John West, RWQCB
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BMPs for discharges of potable water containing chloramines. Program staff researched the BMPs being used by other water utilities (such as EBMUD), and did not find any BMPs specific to chloraminated water (the current standard practice is to use the same BMPs as for chlorinated water). In May 2000, the Management Committee directed Program staff to complete the CED Report with this information and submit the report to the Regional Board.

Thank you for your input to the CED Report. If you have any questions, please contact me.

Very truly yours,

Jill C. Bicknell, EOA, Inc.
Assistant Program Manager

cc: SCVURPPP Management Committee
Robert Falk, Morrison & Foerster

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Conditionally Exempted Discharges: Classification and Control Measures

1.0 INTRODUCTION

The Santa Clara Valley Urban Runoff Pollution Prevention Program (Program, formerly known as the Santa Clara Valley Nonpoint Source Pollution Control Program) consists of fifteen dischargers, the Santa Clara Valley Water District, Santa Clara County and 13 cities and towns in the Santa Clara Valley. These dischargers are Co-permittees of a NPDES storm water discharge permit (No. CAS29718) issued by the Regional Water Quality Control Board (Regional Board). Each Co-permittee has responsibility for discharges to its municipal storm drain system and water courses within its jurisdiction, and each must comply with the requirements in the NPDES Permit regarding storm water and non-storm water discharges.

Generally, discharge of materials other than storm water into storm drain systems and water courses is prohibited as described in Discharge Prohibition A.1 of the permit; however, several categories of discharges may be exempt from this prohibition. Provision C.5.b. of the NPDES Permit identifies twelve (12) such non-storm water discharges that may not require prohibition. These specific non-storm water discharge categories include:

- i. Uncontaminated pumped groundwater,
- ii. Foundation drains,
- iii. Water from crawl space pumps,
- iv. Footing drains,
- v. Air conditioning condensate,
- vi. Irrigation water,
- vii. Landscape irrigation,
- viii. Lawn or garden watering,
- ix. Planned and unplanned discharges from potable water sources,
- x. Water line and hydrant flushing,
- xi. Individual residential car washing, and
- xii. Discharges or flows from emergency fire fighting activities.

In order to exempt these discharges from the non-storm water discharge prohibitions, the Co-permittees are required, as described in Provision C.5.c, to either,

- Demonstrate that each discharge is not a source of pollutant(s) to receiving waters; or
- Identify the circumstances in which the discharges are not sources of pollutants to receiving waters; or
- Describe and implement appropriate control measures under the Urban Runoff Management Plan to minimize the adverse effects of the discharge.

This report presents appropriate control measures for the twelve (12) non-storm water discharges listed above (the last option). Although they are rarely, if ever, pollution sources, each of the discharges may warrant some type of control measure. This report includes a discussion of control measures to reduce pollutants in these discharges to appropriate levels, procedures and Performance Standards for the implementation of these control measures,

procedures for notifying the Regional Board of these discharges, and procedures for monitoring and record management.

This report was developed by a specially formed Ad-Hoc Task Group consisting of qualified Co-permittee staff members. The evaluations and recommendations for these Conditionally Exempted Discharges are based on the Ad-Hoc Task Group's thirty (30) years of combined water quality inspection experience. This report also includes responses to Regional Water Quality Control Board staff comments on an earlier draft of the report.

2.0 PREVIOUS DOCUMENTS AND REPORTS

Several existing Program and outside studies done on these specific Conditionally Exempted Discharges were found. Relevant information from these documents provided support to the recommendations proposed by the Ad-Hoc Task Group.

- The Program's November 1995 "Guidelines for Non-Storm Water Discharges to the Storm Drain System" was developed primarily as a reference list of disposal alternatives for common non-storm water discharges. It provided useful information on some of the conditionally exempted discharges.
- Control measures for the discharge of uncontaminated pumped groundwater and potable water sources are based on information from the Program's June 1998 "Water Utility Operation & Maintenance Discharge Pollution Prevention Plan (WUDPPP)" and the Water Utility Operation and Maintenance Performance Standard (included as a part of the WUDPPP). The WUDPPP and the Performance Standard were developed by an Ad-Hoc Task Group of Co-permittees who operate municipal water utilities.
- Relevant information from the East Bay Municipal Utility District (EBMUD) report on "Environmental Impacts of Potable Water Discharges" (*Draft*, March 1998) and procedures for "Dechlorination of Potable Water Discharges" (effective August 19, 1998) was incorporated into this report.
- A 1995 "Report of Waste Discharges (NPDES Application) for Lawrence Livermore National Laboratory - Livermore Site: Non-Storm Water Discharges" represents a thorough evaluation (data collection and monitoring) of various sources of discharge throughout the Livermore facility. Relevant information regarding air conditioning condensate was incorporated into this report.
- The "Evaluation of Non-Storm Water Discharges and Effective Prohibition Methods," (July 1997) was completed by research staff (L. Donald Duke, et.al) from the University of California, Los Angeles. This study was sponsored by the State Water Resources Control Board with the intent that its findings may facilitate the implementation of a statewide policy on non-storm water discharges. Program staff participated in this effort through a work group of the California Storm Water Quality Task Force.

3.0 CONTROL MEASURES FOR CONDITIONALLY EXEMPTED DISCHARGES

It is the objective of the Co-permittees to address applicable water quality standards and to control pollutants to the maximum extent practicable, with respect to each of the conditionally exempted discharges listed in the Permit. The control measures rely on a case-by-case evaluation to ensure that an appropriate course of action is taken, and includes a process of assessing the conditionally exempted discharge and the existing conditions surrounding the discharge.

The conditionally exempted discharges are grouped together throughout this report based on their common control measures and Co-permittee actions. Control measures for each group are described below, and are summarized in Table 1.

In general, the Regional Board prefers reclamation of conditionally exempted discharges whenever possible. Methods of reclamation include irrigation, dust control, and reuse as process water. If reclamation is not feasible, the Board recommends discharge to the local publicly owned treatment works (POTW), if allowable. The last option is to discharge to a creek or storm drain. In some cases, this may require an NPDES permit. This guidance has been incorporated into the control measures for the discharges as appropriate.

The local POTW should be contacted before redirecting any non-storm water discharges to the sanitary sewer system, to ensure that the addition of the particular discharge to its system will not be problematic. Although each POTW in the Program area usually accepts these discharges, directing flows from these sources to the sanitary sewer system will still be considered on a case by case basis. POTWs, in general, have several concerns regarding non-storm water discharges that enter sanitary sewer systems. Such discharges may have the potential to interfere with wastewater treatment processes, causing the POTW to violate its permit requirements or exceed a desired flow rate, utilize reserve capacity allocated for future development, or hydraulically overload a local collection system.

All Co-permittees want to ensure that clean, natural flows are directed to the storm drain system, and that polluted discharges are treated and/or disposed of properly. Operational restrictions of wastewater treatment plants are some of the factors that determine the maximum extent practicable to which a Co-permittee is able to address non-storm water discharges.

3.1 Control Measures for Discharges: i, ix and x

- i. Uncontaminated Pumped Groundwater,**
- ix. Planned and Unplanned Discharges from Potable Water Sources, and**
- x. Water Line and Hydrant Flushing.**

Control measures for these three conditionally exempted discharges are contained in the Program's Model WUDPPP. Although this WUDPPP applies to treated and untreated potable water supply systems, reclaimed water, raw water and non-potable water, the control measures and discharge evaluations contained within are also relevant and applicable to discharges from uncontaminated pumped groundwater.

Typical constituents of concern include sediment (from erosion), chlorine residual, turbidity and chemical additives. Dissolved oxygen, pH, ammonia and sulfides were determined not to be pollutants of concern in potable water discharges as discussed in the Draft EBMUD report (March 1998).

Another constituent of concern is chloramines which result when chloramination (the addition of both chlorine and ammonia compounds) is used as a means to disinfect potable water supplies. The Santa Clara Valley Water District recently began to use chloramination for disinfection. Current procedures used by EBMUD¹ and other agencies recommend use of the same BMPs for dechlorination of chloraminated water discharges as those used for dechlorination of chlorinated discharges. For the purpose of this report, it is assumed that a chloramine residual is the same pollutant of concern as a chlorine residual. BMPs for discharge of chlorinated water are addressed in the current version of the WUDPPP.. Additional research may be needed to determine whether the residual ammonia in dechlorinated water that originally contained chloramines is a pollutant of concern.

Consistent with the Program's other storm water pollution control measures, actions taken to address the potential concerns and prevent pollution of creeks and the Bay from these three conditionally exempted discharges will include:

- Identify discharges of concern:
 - Determine areas of likely or scheduled discharges. If feasible, survey agencies (e.g., water agencies and fire departments) for key activities related to the three types of discharges. Information to obtain may include responsible agency, source water, flow rate, frequency, flow pathway, receiving water, chemical additives and predictability (planned/unplanned).
 - Identify source of discharge. Determine if discharge is a planned/scheduled activity.
 - Assess area of discharge. Perform visual inspection. Determine flow pathway, and receiving waters.
 - Characterize discharge. Estimate flow rate, frequency, erosion potential, turbidity levels. Determine if any chemical additives are present (e.g., chlorination).
- Select and implement appropriate control measures or Best Management Practices (BMPs) as described in the WUDPPP.
- Train staff and inspectors on pollution prevention procedures, BMPs, etc.
- Continually evaluate and modify control measures for effectiveness as additional information becomes available.

To implement the Water Utility Operation and Maintenance Performance Standard, the Co-permittees with water utilities will be developing individual Water Utility Discharge Pollution Prevention Plans, that address local conditions. The local WUDPPPs will include BMPs and control measures for the three types of discharges, based on the Model WUDPPP.

Disposal of extracted groundwater from groundwater cleanup projects is addressed by Regional

¹ Correspondence with Cynthia Adkisson, Environmental Compliance Section, EBMUD, Oakland, California, November 16, 1999.

Board Resolution No. 88-160². The Regional Board's position is that dischargers of extracted groundwater from groundwater cleanup projects should reclaim their effluents to the extent technically and economically feasible. Methods of reclamation include irrigation, dust control, and reuse as process water. If reclamation is not feasible, the Board recommends discharge to the local POTW. The last option is to obtain an NPDES permit for discharge to a creek or storm drain.

3.2 Control Measures for Discharges: ii, iii and iv

- ii. Foundation Drains,**
- iii. Water from Crawl Space Pumps, and**
- iv. Footing Drains.**

These three conditionally exempted discharges have minimal pollutant concerns. Based on the experience of the inspectors in the Ad-Hoc Task Group, water from foundation drains, crawl space pumps, and footing drains are not typically found to be sources of contaminants. In addition, a majority of experts who were surveyed for the UCLA Report (Duke, July 1997) also found these discharges to be of low concern. Nevertheless, a series of control measures to eliminate or minimize pollution from these sources will be implemented. Co-permittee inspectors will perform the steps outlined below, and use best professional judgment to decide the proper disposal option for the discharge in question.

- A. Examine the immediate site for chemical storage and the potential for the non-storm water discharge to come in contact with pollutants before entering the storm drain system. If a significant potential for chemical contact exists, a sample of the discharge should be collected and analyzed. Based on the results of the sample analysis and the site evaluation, Co-permittee staff should decide whether the flow should be allowed to discharge to the storm drain system, or should be contained and discharged to the sanitary sewer system (with POTW concurrence), or otherwise mitigated.
- B. Evaluate the surrounding neighborhood regarding the potential for local groundwater pollution to impact the discharges. This evaluation may include visual reconnaissance of the surrounding area for the type of land uses represented and/or a records search at appropriate local agencies for evidence of chemical plumes. If a significant potential for chemical contact exists, a sample should be collected and analyzed, and a judgment regarding discharge method should be made as outlined in Step A.
- C. Examine the characteristics of the discharge. If the discharge appears turbid or exhibits other evidence of contamination, treatment of the discharge via filtration, settling, or other methods is required before the discharge may be directed to the storm drain system.

Water from foundation drains, crawl space pumps, and footing drains may be discharged to the storm drain system if the water appears clear, and there is no threat of chemical contamination, based on the evaluation of Co-permittee staff as described in Steps A through C. Co-permittees will respond to any complaint calls regarding these discharges promptly. Additionally, areas

² California Regional Water Quality Control Board, San Francisco Bay Region, Resolution 88-160, "Regional Board Position Statement on the Disposal of Extracted Groundwater from Groundwater Cleanup Projects", October 19, 1988.

with known subsurface drainage problems will be evaluated by the Co-permittees for inclusion into their priority areas for pro-active field investigations. Performing pro-active field investigations in identified high, medium, and low priority areas is a component of the Program's Illicit Connection and Illegal Dumping Identification (IC/ID) and Elimination Activities Model Performance Standard (Attachment 1).

3.3 Control Measures for Discharge: v

v. Air Conditioning Condensate.

Small Air Conditioning Units. For the purposes of implementing storm water pollution control measures, air conditioning condensate can be considered to originate from two main types of units. The first type includes relatively small air conditioning units, such as those used for apartments, hotel rooms, and mobile office trailers. The operation of these small units is characterized by an intermittent dripping of condensate from the outside of the unit.

Consistent with the findings presented in the "Report of Waste Discharges (NPDES Application) for Lawrence Livermore National Laboratory - Livermore Site: Non-Storm Water Discharges," observations of air conditioning condensate from the smaller units have typically found that:

- Collecting a sufficient volume of air conditioning condensate for chemical analysis purposes can be problematic due to low condensate discharge rates from smaller air conditioning units.
- Air conditioning condensate from smaller units is often unlikely to reach a receiving water body for two reasons: (1) the low volume of condensate water produced by these air conditioning units, and (2) the seasonal nature of these air conditioning discharges given unit operation is most prevalent during the summer months, when evaporation and percolation rates are highest, and the condensate drips from the unit onto the ground surface.

Co-permittees will take the following steps to address air conditioning condensate discharges from these relatively small air conditioning units:

- A. Encourage home and apartment owners to direct air conditioning condensate to landscaped areas. This may be accomplished through outreach material directed at residential areas. Air conditioning units in residential areas may be a concern if there is a method by which condensate water can enter a receiving water body. Co-permittees may consider encouraging the plumbing of any condensate lines installed as part of remodeling or new construction to the sanitary sewer system (with POTW concurrence), for those air conditioning units which can be feasibly connected to the system. Directing air conditioning condensate to the sanitary system may be appropriate in cases where the water cannot be directed to landscaping and would otherwise be discharged to an impervious surface leading to the storm drain system or a receiving water body.
- B. Require the proper disposal of descaling or anti-algal agents if they are used to treat these smaller air conditioning units. Residues from flushing agents must be properly disposed of, and the condensate line must be bypassed while flushing the unit.

Large Air Conditioning Units. The second type of air conditioning equipment is the relatively large industrial unit. A continuous flow of condensate water characterizes the operation of these larger machines. Co-permittees will take the following steps to address condensate discharges from large air conditioning units:

- A. Require that condensate lines installed as part of remodeling or new construction be plumbed to the sanitary sewer system (with POTW concurrence), or redirected to landscaping, if appropriate. Flows from these larger industrial units should not be directed to the storm drain system or a receiving water body. These flows are continuous and may contain pollutants. The condensate flow rate may be too large to be directed to landscaping.
- B. Require the proper disposal of descaling or anti-algal agents used to treat larger air conditioning units. Residues from flushing agents must be properly disposed of, and the condensate line must be bypassed while flushing the unit.

3.4 Control Measures for Discharges: iv, vii and viii

- vi. Irrigation Water,**
- vii. Landscape Irrigation, and**
- viii. Lawn or Garden Watering.**

Irrigation water, landscape irrigation and garden watering will be addressed similarly by the Co-permittees, and are therefore grouped together. The concerns associated with these three discharges are primarily potential pesticide and nutrient loading to waterways.

Since it not be feasible to prohibit irrigation or watering activities altogether, targeted distribution of existing education materials would likely be the most effective control measure. Existing distribution of water conservation public outreach material also benefits non-point source pollution control, since over-watering is the primary cause of runoff from landscape, lawn, and garden areas. Co-permittees already perform extensive distribution of brochures such as "Pests Bugging You?" and "Home Maintenance Tips for a Cleaner Bay" which address these three conditionally exempted discharges. Other special education and outreach activities pertaining to these discharges that have been or will be completed are listed below.

- In Spring 1997, lawn care techniques to help prevent non-point source pollution were the major focus of the BASMAA regional advertising campaign.
- In 1997, the Program conducted a pilot project with the Santa Clara County U.C. Cooperative Extension office. This project consisted of point-of-sale distribution of brochures and training of nursery staff in techniques of Integrated Pest Management. Two presentations were given to the California Association of Nurserymen.
- Co-permittees will participate in a region-wide Integrated Pest Management campaign scheduled for fiscal year 1998-1999. This campaign will target pesticide point-of-sales.
- Co-permittees will consider developing a stand-alone outreach document to prevent over-watering that addresses both water conservation and runoff quality issues. Conducting such targeted outreach is one of the control measures the Co-permittees

may implement to reduce pollutants in, and quantities of, irrigation and lawn watering discharges.

To further reduce the threat of pollution from these non-storm water discharges, Co-permittees will evaluate areas with known over-watering or irrigation problems for inclusion into their priority areas for pro-active field investigations. Appropriate BMP literature will be distributed in areas with significant watering or irrigation activities. Co-permittees will respond to any complaint calls about these discharges promptly.

3.5 Control Measures for Discharge: xi

xi. Individual Residential Car Washing

This discharge is a concern primarily due to soaps and other automotive residues which can be carried to waterways and are potentially toxic to fish and wildlife. Since it would not be feasible to prohibit residential car washing activities, targeted distribution of existing education materials and increased attention on field investigations in residential areas would likely be the most effective control measures. Co-permittees already perform extensive distribution of brochures such as "The Bay Begins at Your Front Door" and "Home Maintenance Tips for a Cleaner Bay," which address residential car washing. The Co-permittees also distribute Program literature targeted at vehicle service shops which includes car washing BMPs.

Conducting targeted outreach is one of the control measures the Co-permittees will implement to reduce both pollutants in, and quantities of, residential car washing discharges. Co-permittees will continue to emphasize to citizens that elimination or reduction of pollution from residential car washing activities can be achieved by (1) having cars washed at commercial facilities plumbed to the sanitary sewer system; (2) not using soap and minimizing water use if cars are washed at home; and (3) washing cars over lawn or dirt areas.

Co-permittees will consider developing a stand-alone outreach document that addresses only residential car washing. This will be done to help ensure that guidance for car washing methods are not overlooked, as they may be, if contained in a brochure that addresses other runoff quality issues. Co-permittees will also consider offering incentives, such as coupons for residents to take their cars to commercial car washing facilities, to help reduce pollution from car washing activities.

To further reduce the threat of storm water pollution from this non-storm water discharge, Co-permittees will evaluate areas with known residential car washing problems for inclusion into their priority areas for pro-active field investigations. Appropriate BMP literature will be distributed in areas with significant residential car washing activity. Co-permittees will respond to any complaint calls about residential car washing discharges promptly.

3.6 Conditionally Exempted Discharge: xii

xii. Discharges or Flows from Emergency Fire Fighting Activities.

During an emergency situation, priority for efforts will be directed towards life, property, and the environment in descending order. However, Co-permittees will control the pollution threat from fire fighting activities in the field to the extent that time and resources allow. Some cities are already in the practice of protecting the storm drain system from fire fighting flows during events at chemical storage facilities. Co-permittees will also take steps to eliminate or reduce potential pollution from fire fighting flows in commercial and residential neighborhoods. One method is to plug the storm drain system draining the area at its outfall, thereby using the drainage system between the emergency site and the corresponding outfall for temporary storage. After the emergency event, the water is pumped out of the storm drain system and is properly disposed. Methods of preventing potentially polluted water from entering the storm drain system may vary from jurisdiction to jurisdiction.

4.0 PROCEDURES FOR IMPLEMENTATION OF CONTROL MEASURES

In the case that the Co-permittees choose to address conditionally exempted discharges with control measures, the NPDES Permit requires that a description of procedures and performance standards for implementation of these control measures be submitted to the Regional Board.

Specific procedures are described in the previous discussion on control measures (Section 3). Co-permittees will continue to follow their individual standard operating procedures for field investigations, facility inspections, and public outreach/education activities that apply to the conditionally exempted discharges.

5.0 PERFORMANCE STANDARDS FOR IMPLEMENTATION OF CONTROL MEASURES

The NPDES Permit requires that performance standards for implementation of these control measures be developed. The twelve conditionally exempted discharges listed in the NPDES Permit are addressed under the Program's Model Performance Standards for IC/ID and Water Utility Operation and Maintenance, as indicated in this section.

5.1 Discharges i, ix and x

- i. Uncontaminated Pumped Groundwater,**
- ix. Planned and Unplanned Discharges from Potable Water Sources, and**
- x. Water Line and Hydrant Flushing.**

These conditionally exempted discharges are addressed in the Water Utility Operation and Maintenance Performance Standard. Although this Performance Standard applies to Co-permittee-owned water utility operations, the levels of effort in implementing the associated control measures incorporated into the Standard are applicable to private water companies and any other dischargers of uncontaminated pumped groundwater, potable water, and line and hydrant water. Individual performance standards are being developed by the Co-permittees that operate water supply/distribution systems.

5.2 Discharges ii, iii and iv

- ii. Foundation Drains,**
- iii. Water from Crawl Space Pumps, and**
- iv. Footing Drains.**

The IC/ID Model Performance Standard contains provisions for each Co-permittee to conduct field investigations in high priority areas within its jurisdiction. Areas with significant occurrence of these three discharges will be included as priority areas for pro-active field investigations. Complaints regarding these discharges will also be responded to promptly as described in the Performance Standard.

5.3 Discharge v

- v. Air Conditioning Condensate**

Air conditioning condensate from industrial units will be addressed by each Co-permittee's implementation of its Industrial/Commercial Discharger Control Program Performance Standard, if applicable.

Air conditioning condensate concerns in residential areas will be primarily addressed through distribution of outreach material as part of implementing the Training/Education/Outreach portion of the IC/ID Performance Standard.

5.4 Discharges vi, vii, viii and xi.

- vi. Irrigation Water,**
- vii. Landscape Irrigation,**
- viii. Lawn or Garden Watering, and**
- xi. Individual Residential Car Washing.**

Co-permittees will include these four discharges when addressing sources of storm water pollution from residences and commercial facilities in their targeted outreach material.

The IC/ID Model Performance Standard contains provisions for each Co-permittee to conduct field investigations in identified priority areas within its jurisdiction. Areas with significant occurrence of these four discharges will be included as priority areas for pro-active field investigations. Complaints regarding these discharges will also be responded to promptly as described in the IC/ID Performance Standard.

5.5 Discharges xii

xii. Discharges or Flows from Emergency Fire Fighting Activities

Each Co-permittee will review the activities of the fire department(s) that serve(s) its area and determine the extent to which field personnel protect the storm drain system from discharge of pollutants during emergency activities. Co-permittees will not conduct pollution prevention procedures in the field during emergency fire fighting events at the expense of either lives or property. However, each Co-permittee will ensure that staff fighting fires within its jurisdiction are aware of storm water pollution issues, and have the materials and equipment available in the field to protect water quality during emergency events.

During a fire at a facility with a known chemical hazard, the Hazardous Materials Team present on site will be relied upon to take appropriate action to prevent or reduce polluted discharges from entering the storm drain system. After protecting life and property, the main concern of the team would be to protect the environment, including preventing chemical contamination of nearby receiving waters. The primary concern associated with fires in residences and similar buildings with regards to water quality is the introduction of debris and sediment to the storm drain system. As much as is feasible during an emergency, fire fighting staff will implement measures to prevent these materials from entering the storm drain system.

6.0 DISCHARGE NOTIFICATION PROCEDURES

The NPDES Permit requires submittal of a description of procedures for notifying the Regional Board about incidents of conditionally exempted discharges.

The Regional Board will be notified of reported incidents of non-storm water discharges in the Program's Annual Report each year, as part of the reporting form each Co-permittee uses to report illegal dumping incidents.

7.0 MONITORING / RECORD MANAGEMENT PROCEDURES

The NPDES Permit requires that a description of procedures for monitoring and record management concerning conditionally exempted discharges be submitted to the Regional Board.

Monitoring the status of the conditionally exempted discharges will include looking for trends in non-storm water discharge occurrence over time, conducting follow-up activities after discharge investigations, and performing effectiveness evaluations to determine how well the control measures are working. Co-permittees may also use monitoring information to help designate priority areas for pro-active field investigations.

Procedures for record management shall remain consistent with Co-permittees' existing procedures for handling information. All of the conditionally exempted discharges will be handled by Co-permittee staff familiar with their respective jurisdiction's Urban Runoff Management Plan elements and Performance Standards under which the specific discharges are addressed.

**TABLE 1
 SUMMARY OF
 CONTROL MEASURES FOR CONDITIONALLY EXEMPTED DISCHARGES**

CONDITIONALLY EXEMPTED DISCHARGE	POTENTIAL AREAS/ POLLUTANTS OF CONCERN	CONTROL MEASURES
(i) Uncontaminated pumped groundwater	<ul style="list-style-type: none"> • Sediment and turbidity onsite and offsite (from erosion caused by release of discharge) • Existing chlorine residual • Presence of chemical additives 	<ol style="list-style-type: none"> 1. Identify source of discharge. <ul style="list-style-type: none"> – determine if discharge is a planned/scheduled activity. 2. Assess area of discharge <ul style="list-style-type: none"> – determine flow pathway and receiving waters. 3. Characterize discharge: <ul style="list-style-type: none"> – flow rate (15-20 gpm O.K.) – frequency – erosion potential – turbidity levels – chemical additives present (e.g., chlorine). 4. If flows > 20 gpm, contact City or local POTW; call SCVWD if discharge < 50 feet from creek. 5. Assess potential for groundwater pollution based on knowledge of historical land uses. 6. Determine if area is (or should be) classified by the inspecting agency as a priority area for proactive field investigations.³ 7. Use WUDPPP Tables 1 and 2 to identify appropriate control measures or BMPs.⁴ 8. Apply control measures or BMPs.
(ii) Foundation drains	<ul style="list-style-type: none"> • Chemical contamination • Potential for chemicals to come into contact with the discharge (en route to storm drain) • Existing local groundwater pollution 	<ol style="list-style-type: none"> 1. Promptly respond to any complaint calls regarding this discharge. 2. Perform visual inspection of area of discharge. 3. Locate areas of chemical storage or usage. 4. Assess potential for groundwater pollution based on knowledge of historical land uses. 5. Determine if area is (or should be) classified by the inspecting agency as a priority area for proactive field investigations.¹ 6. Based on Steps 2-5, assess potential for contamination. 7. Examine discharge for turbidity and/or other evidence of contamination. 8. If contamination or potential for contamination exists, collect sample of discharge for chemical analysis. Depending on sample results and site evaluation, discharge flow to storm drain or sanitary sewer system, as appropriate and allowed by POTW. <p>If no contamination is evident <u>and</u> the discharge is not turbid, discharge may be directed to the storm drain system.</p>
(iii) Water from crawl	<i>Same as Discharge (ii)</i>	<i>Same as Discharge (ii)</i>

³ Identifying priority areas is a component of the Illicit Connection and Illegal Dumping Identification and Elimination Activities Model Performance Standard provided in Attachment 1 of this report.

⁴ Refer to the “Tables” section of the most recent SCVURPPP Water Utility Operation & Maintenance Discharge Pollution Prevention Plan (WUDPPP) to determine selection and implementation of BMPs.

TABLE 1, continued
SUMMARY OF
CONTROL MEASURES FOR CONDITIONALLY EXEMPTED DISCHARGES

CONDITIONALLY EXEMPTED DISCHARGE	POTENTIAL AREAS/ POLLUTANTS OF CONCERN	CONTROL MEASURES
space pumps		
(iv) Footing drains	<i>Same as Discharge (ii)</i>	<i>Same as Discharge (ii)</i>
(v) Air conditioning condensate	<ul style="list-style-type: none"> Contamination from chemical additives such as descaling or anti-algal agents, used in air conditioning units. 	<ol style="list-style-type: none"> Require proper disposal of chemical additives and any flushing residues from these additives. Condensate line must be bypassed while flushing the air conditioning unit. For small air conditioning units: <ul style="list-style-type: none"> encourage users (e.g., via outreach material) to direct condensate to landscaped areas, with approval from the local POTW, direct condensate line to sanitary sewer system, when feasible. For large air conditioning units: <ul style="list-style-type: none"> depending on quantity of flow, re-direct condensate lines to nearby landscaping or to sanitary sewer system. With approval from local POTW, preference is to direct to sanitary sewer system, when feasible.
(vi) Irrigation water	<ul style="list-style-type: none"> Presence of pesticides Nutrients from fertilizers 	<ol style="list-style-type: none"> Promptly respond to any complaint calls regarding this discharge. Conduct targeted outreach. Distribute existing education and outreach material, focusing on preventing over-watering and over-application of pesticides and fertilizers, in areas of significant watering or irrigation activities. Continue participation in local and region-wide education and outreach efforts related to this discharge. Include areas of known over-watering and/or over-application of pesticides and fertilizers, in Co-permittees' priority areas for pro-active field investigations.
(vii) Landscape irrigation	<i>Same as Discharge (vi)</i>	<i>Same as Discharge (vi)</i>
(viii) Lawn or garden watering	<i>Same as Discharge (vi)</i>	<i>Same as Discharge (vi)</i>
(ix) Planned and unplanned discharges from potable water sources	<i>Same as Discharge (i)</i>	<i>Same as Discharge (i)</i>
(x) Water line and hydrant flushing	<i>Same as Discharge (i)</i>	<i>Same as Discharge (i)</i>
(xi) Individual residential car	<ul style="list-style-type: none"> Soaps and surfactants Automotive fluid residues 	<ol style="list-style-type: none"> Promptly respond to any complaint calls regarding this discharge.

TABLE 1, continued
SUMMARY OF
CONTROL MEASURES FOR CONDITIONALLY EXEMPTED DISCHARGES

CONDITIONALLY EXEMPTED DISCHARGE	POTENTIAL AREAS/ POLLUTANTS OF CONCERN	CONTROL MEASURES
washing		2. Conduct targeted outreach. Distribute existing education and outreach material (including BMPs) that address residential car washing to residents and at vehicle service shops. 3. Encourage and provide incentives for residents to <ul style="list-style-type: none"> - wash their cars at commercial facilities, - minimize use of soap and water when cars are washed at home, - wash cars over lawn or dirt areas. 4. Include areas of known residential car washing problems, in Co-permittees' priority areas for proactive field investigations.
(xii) Discharges or flows from emergency fire fighting activities	<ul style="list-style-type: none"> • Debris and contaminated runoff from fire fighting • Sediment and turbidity (from erosion caused by release of discharge) 	To the extent practicable during emergency situations: <ol style="list-style-type: none"> 1. Protect storm drains during emergencies involving chemical facilities. 2. Isolate storm drain system in vicinity of event and utilize as temporary storage for runoff.