



SAN MATEO COUNTYWIDE
Water Pollution Prevention Program
Clean Water. Healthy Community.

Municipal Regional Permit: Provisions C.4/C.5 and Beyond

Kristin Kerr, P.E.
EOA, Inc.

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Presentation Overview

- Municipal Regional Stormwater Permit (MRP)
- Provision C.4 – Industrial/Commercial Inspections
- Provision C.5 – Illicit Discharge Inspections
- Other Relevant Provisions

Municipal Regional Permit

- San Francisco Bay Municipal Regional Stormwater Permit (MRP)
- Covers 79 cities, counties, and districts in Bay Area

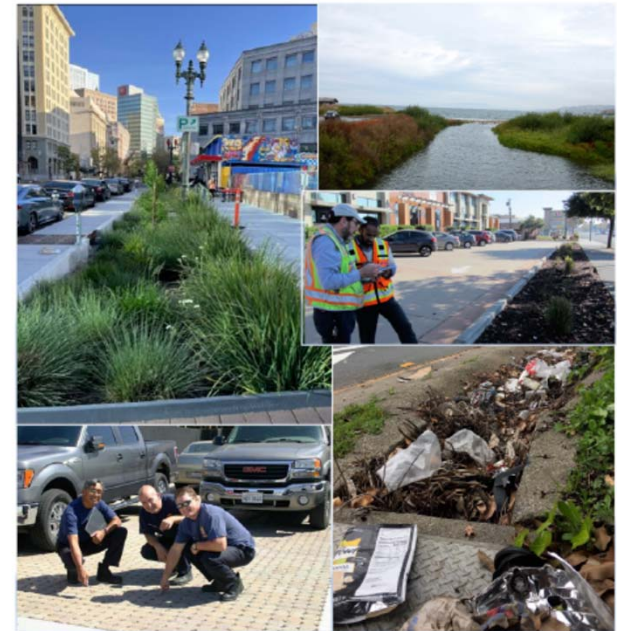


Municipal Regional Permit

- First adopted Oct 2009
- Renewed every 5 years
- MRP 2.0 Effective Jan 2016
- MRP 3.0 Effective July 2022

California Regional Water Quality Control Board
San Francisco Bay Region
Municipal Regional Stormwater NPDES Permit

Order No. R2-2022-0018
NPDES Permit No. CAS612008
May 11, 2022



San Mateo County Applicable MRP Provisions

Topic Specific		Pollutant Specific		Monitoring/Reporting	
C.2 Municipal Operations	C.6 Construction Site Controls	C.9 Pesticides Toxicity Control	C.13 Copper Controls	C.8 Water Quality Monitoring	C.16 Discharges to ASBS
C.3 New Development and Redevelopment	C.7 Public Information and Outreach	C.10 Trash Load Reduction	C.14 Bacteria Controls	C.20 Cost Reporting	C.21 Asset Management
C.4 Industrial/Commercial Site Controls	C.15 Exempted and Conditionally Exempted Discharges	C.11/12 PCB and Mercury Controls	C.18 Control of Sediment Discharges from Coastal SMC		
C.5 Illicit Discharge Controls	C.17 Unsheltered Homeless Populations				

Commercial/Industrial Site Control Program (Provision C.4)

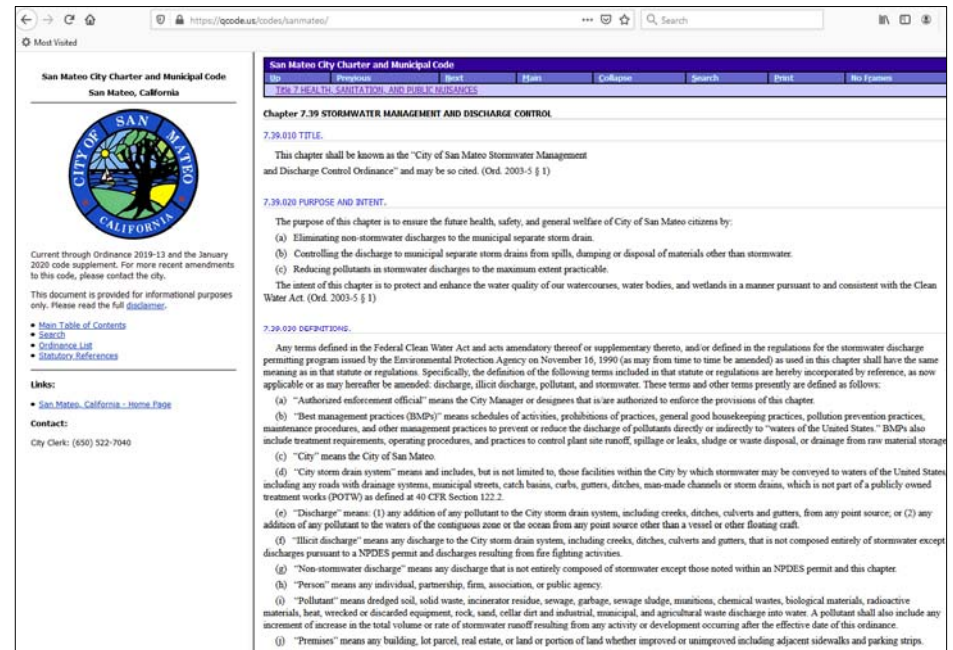
- Prevent discharges of pollutants and impacts on receiving waters
- Regulate by Best Management Practices (BMPs)



Commercial/Industrial Site Control Program

■ Legal authority = Municipal Code

- Inspect
- Require BMPs
- Issue enforcement actions



The screenshot displays the San Mateo City Charter and Municipal Code website. The main content area is titled "Chapter 7.39 STORMWATER MANAGEMENT AND DISCHARGE CONTROL". It includes the following text:

7.39.010 TITLE.
This chapter shall be known as the "City of San Mateo Stormwater Management and Discharge Control Ordinance" and may be so cited. (Ord. 2003-5 § 1)

7.39.020 PURPOSE AND INTENT.
The purpose of this chapter is to ensure the future health, safety, and general welfare of City of San Mateo citizens by:

- (a) Eliminating non-stormwater discharges to the municipal separate storm drain.
- (b) Controlling the discharge to municipal separate storm drains from spills, dumping or disposal of materials other than stormwater.
- (c) Reducing pollutants in stormwater discharges to the maximum extent practicable.

The intent of this chapter is to protect and enhance the water quality of our watercourses, water bodies, and wetlands in a manner pursuant to and consistent with the Clean Water Act. (Ord. 2003-5 § 1)

7.39.030 DEFINITIONS.
Any terms defined in the Federal Clean Water Act and acts amendatory thereof or supplementary thereto, and/or defined in the regulations for the stormwater discharge permitting program issued by the Environmental Protection Agency on November 16, 1990 (as may from time to time be amended) as used in this chapter shall have the same meaning as in that statute or regulation. Specifically, the definition of the following terms included in that statute or regulations are hereby incorporated by reference, as now applicable or as may hereafter be amended: discharge, illicit discharge, pollutant, and stormwater. These terms and other terms presently are defined as follows:

- (a) "Authorized enforcement official" means the City Manager or designees that is authorized to enforce the provisions of this chapter.
- (b) "Best management practices (BMPs)" means schedules of activities, prohibitions of practices, general good housekeeping practices, pollution prevention practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants directly or indirectly to "waters of the United States." BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.
- (c) "City" means the City of San Mateo.
- (d) "City storm drain system" means and includes, but is not limited to, those facilities within the City by which stormwater may be conveyed to waters of the United States including any roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels or storm drains, which is not part of a publicly owned treatment works (POTW) as defined at 40 CFR Section 122.2.
- (e) "Discharge" means: (1) any addition of any pollutant to the City storm drain system, including creeks, ditches, culverts and gutters, from any point source; or (2) any addition of any pollutant to the waters of the contiguous zone or the ocean from any point source other than a vessel or other floating craft.
- (f) "Illicit discharge" means any discharge to the City storm drain system, including creeks, ditches, culverts and gutters, that is not composed entirely of stormwater except discharges pursuant to a NPDES permit and discharges resulting from fire fighting activities.
- (g) "Non-stormwater discharge" means any discharge that is not entirely composed of stormwater except those noted within an NPDES permit and this chapter.
- (h) "Person" means any individual, partnership, firm, association, or public agency.
- (i) "Pollutant" means dredged soil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharge into water. A pollutant shall also include any increment of increase in the total volume or rate of stormwater runoff resulting from any activity or development occurring after the effective date of this ordinance.
- (j) "Premises" means any building, lot parcel, real estate, or land or portion of land whether improved or unimproved including adjacent sidewalks and parking strips.

Commercial/Industrial Site Control Program

Business Inspection Plan (BIP)

Types of Businesses for inspection,
Priorities,
Inspection Frequency,
List of Businesses

Inspections
(Record Keeping)

Enforcement Response Plan (ERP)

Protocols for enforcement actions,
follow-up inspections,
corrective action
timelines

Commercial/Industrial Site Control Program

■ Corrective Actions

- Active discharge - cease immediately
- Corrective actions w/in 10 business days or before next rain event
 - Longer if document rationale and time frame
- Verify corrective actions

Illicit Discharge Detection and Elimination Program (Provision C.5)

- Control illicit discharges not otherwise addressed under C.4/C.6/C.17
- Implement Program
 - Legal authority
 - Centralized complaint collection
 - For Public and Staff
 - Follow-up to detect and eliminate illicit discharges
 - Maintain compliant tracking system



IDDE Program

Central Contact Point

Collect information on the reported discharge. Use flow charts/phone trees to contact appropriate staff and other agencies, as needed.

Investigation to start within 3 business days (Record Keeping)



Enforcement Response Plan (ERP)

Protocols for enforcement actions, follow-up inspections, corrective action timelines

Control of Mobile Sources

- Minimum BMPs for various mobile businesses
 - Automobile washing
 - Vehicle Fueling
 - Power washing
 - Steam cleaning
 - Carpet cleaning
 - Graffiti removal
 - Pet grooming



Control of Mobile Sources

■ Legal Authority

- Hold mobile businesses, businesses, property managers, property owners, and entities that hire mobile businesses responsible

■ Update Inventory Annually

- Countywide inventory – CII Members Only webpage
- Provide mobile business information to EOA

Control of Mobile Sources

■ Enforcement Strategy

- Share Enforcement Actions Countywide - CII Members Only webpage
- SMCWPPP Letter sent to businesses with multiple enforcement actions in different jurisdictions

■ Outreach Strategy

- SMCWPPP Fact Sheets
- Coordinate outreach messages with PIP Subcommittee

Control of Mobile Sources

- Inspect Mobile Businesses
 - Commercial properties
 - Activities during C.4 facility inspections
 - IDDE Complaints

Other MRP Provisions

Provision C.12 PCBs Controls

- Old Industrial Areas with Moderate PCBs Concentrations
 - New Inspection Program!

Provision C.13 Copper Source Control





- **Manage discharges from Pools/Spas/Fountains**
 - Legal authority to prohibit discharge of water containing copper-based chemicals
 - Annually report on enforcement – [IDDE Program](#)
- **Industrial Sources**
 - Include industrial facilities likely to have sources of copper in inspection programs
 - During industrial inspections ensure proper BMPs
 - Educate industrial inspectors on facilities and proper BMPs
 - Annually report on industrial inspection component – [C.4 Program](#)

Provision C.10 Trash Load Reduction

- Private Land Drainage Areas (PLDAs) addressed by July 2025
 - New Trash Inspection Program!
 - SMCWPPP Training Workshop held January 30, 2024
 - PLDA Inspection = On Land Visual Trash Assessment (OVTA) + Trash Management BMPs Observations

Provision C.10 Trash Load Reduction

Trash Generation (Loading)

Trash Level	Map Display	OVRTA Score	Range of Trash Volume Entering Inlet (gal / acre / year)
Low		A	< 5*
Medium		B	5 - 10
High		C	10 - 50
Very High		D	> 50

*Equivalent to Full Trash Capture

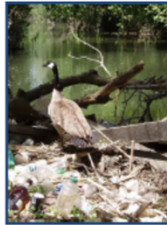
Provision C.10 Trash Load Reduction

TRASH CONTROL REQUIREMENTS PRIVATE LAND DRAINAGE AREAS (PLDAs) Information for Property Owners and Managers

City/County
Logo Here

Trash¹, A Pollutant of Concern for Stormwater

Stormwater from your property enters a storm drain inlet and flows directly to local creeks and San Francisco Bay, without treatment. Stormwater is often contaminated by pollutants (e.g., trash) that are deposited on land and can be toxic to fish, wildlife, and people. Trash is a pollutant that has seriously impacted local creeks, rivers, and the San Francisco Bay. Data suggests that plastic trash persists for hundreds of years in the environment and can pose a threat to wildlife through ingestion, entrapment, as well as harboring chemicals harmful to the aquatic environment.



Waterbody impacted by trash

Bay Area public agencies are responsible for controlling stormwater pollution by complying with the [Municipal Regional Stormwater Permit \(MRP\)](#)² and achieving trash reduction goals set by the San Francisco Bay Regional Water Quality Control Board. Cities and counties are expending significant resources to reduce the levels of trash in stormwater runoff from public areas (e.g., streets). Cities and counties are also required to ensure that trash on Private Land Drainage Areas (PLDAs) is controlled. Therefore, cities and counties are conducting inspections of PLDAs suspected to generate moderate, high, or very high levels of trash.

PLDA Trash Inspection Program

Your city or county is implementing a Trash Inspection Program (TIP) to determine if PLDAs are generating problematic levels of trash. For those properties that are, your city/county staff will work with property owners or managers to implement actions to reduce trash generation to a low level.

The TIP entails an inspector visiting a PLDA and: 1) verifying that one or more storm drain inlets are located on-site, 2) conducting an On-land Visual Trash Assessment (OVTA), 3)



High Trash Generating PLDA lacking trash management BMPs

documenting potential sources of trash, and 4) identifying controls that the property owner/manager will need to implement to improve trash levels on the PLDA. Property owners and managers can use one of two methods to demonstrate that their property has achieved the low trash generation goal:

- A. Install certified **Full Trash Capture Device(s)**; OR
- B. Keep the property consistently clean to a **Low Trash Generation Level**, as observed during municipal inspections.

What is a PLDA?

A Private Land Drainage Area (PLDA) is a property with one or more storm drain inlets on-site that connect to a city or county-owned stormwater drainage system.



Storm drain inlet on private property

LEARN MORE ABOUT THESE TWO METHODS OF COMPLIANCE ON THE NEXT PAGE!

¹Trash as defined in California Government Code Section 65055.1(g) and means all improperly discarded waste material, including, but not limited to, convenience food, beverage, and other product packages or containers thrown or deposited on lands and in waters of the State of California.

² See [MRP 3.0](#) (pages C.10 a.ii – pg. 140)

TWO METHODS OF COMPLIANCE

A. CERTIFIED FULL TRASH CAPTURE DEVICE

A Full Trash Capture (FTC) device is a stormwater treatment device that is installed in the stormwater drainage system to intercept trash and other debris. FTC devices must be sized to intercept trash during storms of specific sizes and must be certified by the State Water Resources Control Board (State Water Board). There are many different types of FTC devices certified to date, including those that require construction and can intercept trash from hundreds of acres (e.g., hydrodynamic separators) and smaller devices (i.e., catch basin inserts) that are likely more applicable to PLDAs and can be installed into storm drain inlets relatively easily.

There are two general designs of Catch Basin Inserts: inlet baskets or screens that are installed just below the inlet grate, or outlet screens that are placed inside the catch basin in front of the outlet pipe. These FTC devices must be installed correctly by a vendor and consistently maintained to ensure their effectiveness in intercepting trash. A full list of certified FTC devices is available on the [California Stormwater Quality Association's website](#).³

EXAMPLE FULL TRASH CAPTURE DEVICES



Outlet Screen
(Image courtesy of EOA, Inc.)



Inlet Filter
(Image courtesy of REM, Inc.)

B. BEST MANAGEMENT PRACTICES (BMPs) TO ACHIEVE "LOW TRASH GENERATION"

An alternative to installing and maintaining a certified FTC device is to implement BMPs that consistently keep trash at a low trash generation level (see description below). Examples of BMPs that can help a property owner or manager reach a consistently low trash generation level are listed below. City or County inspectors will confirm the achievement of low trash generation through visual inspections of the property.

Source Control BMPs

Source controls prevent potential pollutant sources from contacting rainfall and stormwater.

- ✓ Keep waste bin lids closed - keep surrounding areas clean
- ✓ Ensure adequately sized trash bins and pickup frequency
- ✓ Cover outdoor materials handling & storage areas
- ✓ Use "No Dumping, Flows to Bay" labels on storm drain inlets
- ✓ Have trash bins and cigarette receptacles in areas for the public or where employees congregate

Good Housekeeping BMPs

- ✓ Keep parking areas, material storage, and staging areas clean and orderly
- ✓ Do not allow bins to overflow and do not stack materials outside of bins
- ✓ Post "No Littering" signs and enforce anti-littering laws
- ✓ Train staff to regularly inspect parking lots and paved surfaces on your property for litter - collect any litter and dispose in trash bins

Surface Cleaning & Sweeping BMPs

- ✓ Sweep outdoor areas and dumpster areas regularly
- ✓ Schedule mechanical sweeping of outside equipment staging areas, materials storage areas, and parking areas at a frequency that keeps the area consistently free of trash
- ✓ Manually sweep areas where mechanical sweeping cannot be effectively implemented

LOW TRASH GENERATION (Not Littered)

Low trash generation is effectively no trash/litter on the property AND having BMPs in place to minimize the risk of trash entering on-site storm drain inlets or from being blown offsite.



Low Trash Generating PLDA



This fact sheet was developed by the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP). For more information, visit www.eoainc.org.

³ <https://www.casqa.org/resources/water-quality-priorities/trash/certified-trash-full-capture-systems-available-to-the-public>

Provision C.17 Discharges Associated with Unsheltered Homeless Populations

- Regional BMP Report submitted Sept 2023
- Sept 2023 & Sept 2025 Annual Reports
 - Map locations of unsheltered homeless, MS4s and creeks/Bay
 - Report BMPs implemented and effectiveness evaluation
 - SOPs for responding to illicit discharges of human waste from RVs and/or unsheltered homeless

Provision C.15 Exempt and Conditionally Exempt Discharges

- Prohibit Non-stormwater Discharges
 - Discharge Prohibitions A.1
- Exempted Discharges
 - Provision C.15.a
- Conditionally Exempt Discharges
 - Provision C.15.b

Provision C.15.a Exempt Discharges

- Flows from riparian habitats, wetlands, natural springs, diverted stream flows or rising ground waters
- Uncontaminated and unpolluted groundwater (GW) infiltration
- Single family homes' pumped GW, foundation drains, and water from crawl space pumps and footing drains
- Pumped GW from drinking water aquifers
- NPDES permitted discharges - individual or general permits

Provision C.15.a Exempt Discharges

- **Statewide Permits adopted by State Water Board**
 - Drinking Water Systems Discharges
 - Discharges from Utility Vaults and Underground Structures
 - Industrial Stormwater General Permit (IGP)
 - Construction Stormwater General Permit
 - Small MS4 (Phase II) General Permit

Provision C.15.a Exempt Discharges

■ Statewide General Permits

- Apply for coverage by submitting Notice of Intent (NOI)
- Compliance by Regional Water Board or State Water Board

■ Municipal Inspectors

- If BMPs not in place and/or discharging pollutants can issue enforcement (local ordinance) and/or refer to RWB

Provision C.15.b Conditionally Exempt Discharges

- Shown as not a source of pollutants or BMPs implemented
 - Pumped GW from non-drinking water aquifers
 - Pumped GW, foundation drains, and water from crawl space pumps and footing drains
 - Air conditioning condensate
 - Individual residential car washing
 - Swimming pool, hot tub, spa, and fountain discharges
 - Irrigation water, landscape irrigation and lawn or garden watering
 - **Emergency Discharges of Firefighting Water and Foam**

Provision C.15.b Conditionally Exempt Discharges

- Emergency Discharges of Firefighting Water and Foam
 - Regional Work Group
 - Regional Firefighting Discharge Report due Sept 30, 2025
 - Review adequacy of BMPs/SOPs and recommend changes
 - Outreach Materials on containment and cleanup
 - Evaluate Large Industrial Sites – New Inspection Program! Stay tuned for more guidance

Provision C.15.b Conditionally Exempt Discharges

- Evaluate Large Industrial Sites
 - Adequacy of BMPs/SOPs for prevention, containment and cleanup of emergency firefighting discharges into storm drains and receiving waters
 - Cause improvements to BMPs/SOPs as appropriate
 - Identify Large Industrial Sites – such as IGP sites, gas plants, gas concentration facilities and chemical plants
 - Annually report on implementation

Contact Information



Kristin Kerr, P.E.

kakerr@eoainc.com