



Annual C3 Workshop
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Why Do We Do Inspections? A Review of Stormwater Permit Requirements

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Outline of Presentation

- O&M Verification Inspection Requirements in the Municipal Regional Stormwater Permit
- Maintenance Assurance
- O&M Verification Inspection Plans
- Tracking and Reporting O&M Inspections
- Enforcement Response Plans

Bay Area Municipal Regional Permit (MRP)

- One regional permit for urbanized areas (total of 76 permittees):
 - San Mateo, Santa Clara, Alameda, and Contra Costa Counties, Fairfield-Suisun, and Vallejo
- Current MRP effective 1/1/16 - 12/31/20
- Key requirements:
 - Low Impact Development (LID); Green Infrastructure
 - Monitoring and control measures for pollutants of concern: Trash, Mercury, PCBs, Pesticides



Permanent Facilities that Require O&M Inspections

- Provision C.3.h of the MRP requires agencies to conduct inspections to verify operation & maintenance (O&M) of:
 - Pervious pavement systems $\geq 3,000$ sq ft
 - Stormwater treatment measures
 - Hydromodification management (HM) measures
- Applies to measures associated with a Regulated Project
- GSI measures should be inspected and maintained but not covered by C.3.h

O&M Requirements (Provision C.3.h)

- Agencies subject to the MRP must:
 - Require facility owners to conduct ongoing maintenance (e.g., maintenance agreement).
 - Prepare and implement plan for annual O&M verification inspections, including new installations
 - Conduct O&M verification inspections; provide enforcement as needed
 - Track and report on inspections
 - Have an enforcement response plan to bring facility owners into compliance

What about Municipal Facilities?

- O&M inspection requirements do not distinguish between municipal and non-municipal facilities
- Inspect, track and report on O&M of facilities at municipal Regulated Projects that your municipality is responsible for maintaining
- For non-regulated facilities (GSI), do not need to track and report inspections and maintenance (but do need to report newly constructed facilities)

Maintenance Assurance

- Provision C.3.h requires property owner to assure ongoing O&M
- Permittees' O&M Verification Program must include legally enforceable mechanism(s):
 - Conditions of approval
 - Signed statement accepting responsibility (e.g., maintenance agreement)
 - Conditions in sales or lease agreements
 - Home-owner association CC&Rs
 - Recordation in property deed

Maintenance Agreement

- Identifies responsible party
- Grants access to municipal inspectors, Water Board staff, and Vector Control District staff
- Lists self-inspection and reporting requirements
- Includes O&M Plan for each treatment/HM facility (templates available in C.3 Stormwater Handbook, Appendix G)
- Includes site map and locations of each facility
- Describes enforcement and penalties

O&M Inspection Plan

- Each fiscal year, inspect:
 - All newly installed pervious pavement, stormwater treatment, and HM facilities at completion of installation
 - An average of 20% (at least 15%) of total number of installed pervious pavement, stormwater treatment, and HM facilities
 - For vault-based systems, can accept 3rd party inspection reports
- All installed pavement/treatment/HM facilities must be inspected at least once every 5 years
- No requirement to inspect during construction (but recommended)

O&M Enforcement Response Plan (ERP)

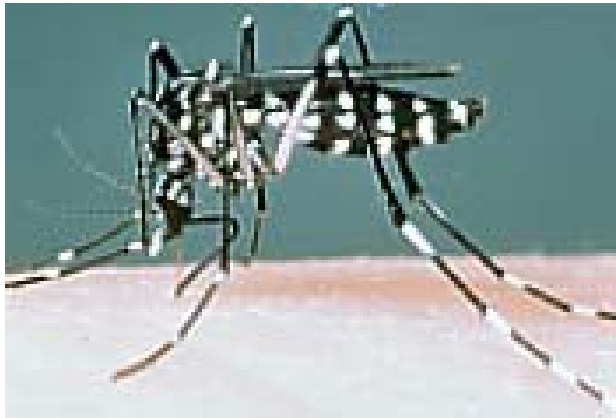
- O&M ERPs were required beginning in 2017
- Guidance for inspectors to take consistent actions to bring sites into compliance
 - Identify enforcement tools
 - Roles and responsibilities of staff
 - Time period for implementing corrective actions
- Corrective actions must be implemented within 30 days of inspection
 - Actions can be temporary and more time allowed for permanent corrections (with explanation)

Lessons Learned from NOV's

- Round up when calculating ~20% of pavement/treatment/HM facilities per year
 - If your agency has fewer than 5 facilities, be sure to inspect at least one per year
- Annual Reporting year is July 1 - June 30
 - Inspections must be completed during this time period when computing 20%

Vector Control District Coordination

- List of newly-installed facilities (including GSI) must be submitted each year to Santa Clara County Vector Control District and Regional Water Board
- Must be submitted before October 1




- SCVURPPP makes the submittal based on info in your Annual Report

Tracking & Reporting Requirements

- O&M Verification Inspection Checklist
- Annual Report O&M Inspection Table (summary statistics)
- Each agency should have an internal tracking table with data on each inspection
 - NOT submitted with Annual Report
 - Can be requested by Regional Board at any time

O&M Verification Checklist



Standard Stormwater Treatment BMP Inspection Data Collection Form

Date: _____ Time: _____ File Number: _____
Municipality: _____ Agency or Department: _____
Inspectors: _____

| I. REASON FOR INSPECTION | | |
|----------------------------------|--|--------------------------------------|
| <input type="checkbox"/> Initial | <input type="checkbox"/> Follow-up | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Routine | <input type="checkbox"/> Response to Complaint | Inspection Frequency: _____ |

| II. PROJECT INFORMATION | | |
|--|-------------------------------|--|
| 1. ID # or Assessor Parcel Number: _____ | 2. Date of Installation _____ | |
| 3. Project Type: <input type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Industrial <input type="checkbox"/> Multi-use <input type="checkbox"/> Road <input type="checkbox"/> Institutional <input type="checkbox"/> Other | | |
| 4. Facility Name: _____ | | |
| Site Address: _____ | | |
| Contact Name: _____ Phone: _____ | | |
| 5. If the property owner is different than the contact name, fill out information below: | | |
| Owner Name: _____ Title: _____ | | |
| Owner's Address: _____ Phone: _____ | | |
| 6. If the BMP operator is different than the contact name, fill out information below: | | |
| Name: _____ Title: _____ | | |
| Address: _____ Phone: _____ | | |
| 7. Maintenance Documentation: <input type="checkbox"/> Reviewed <input type="checkbox"/> Not Reviewed <input type="checkbox"/> Not Available <input type="checkbox"/> Other: _____ | | |
| 8. Party responsible for O&M Documentation: <input type="checkbox"/> Property owner <input type="checkbox"/> BMP Operator <input type="checkbox"/> Contractor | | |
| <input type="checkbox"/> Other: _____ | | |

| III. BMP TYPE AND INSPECTION RESULTS (Use Codes from "Potential Inspection Results with Definitions" sheet) | | |
|--|---|---|
| 1. Biofiltration <input type="checkbox"/> Vegetated Swale _____ <input type="checkbox"/> Vegetated Buffer Strip _____ <input type="checkbox"/> Bioretention _____ <input type="checkbox"/> Roof Gardens _____ <input type="checkbox"/> Planter Boxes _____ | Structural <input type="checkbox"/> Drain Insert _____ <input type="checkbox"/> Porous Pavement _____ <input type="checkbox"/> Media Filter _____ <input type="checkbox"/> Hydrodynamic Separator _____ <input type="checkbox"/> Vortex Separator _____ <input type="checkbox"/> Water Quality Inlet _____ <input type="checkbox"/> Underground Detention Systems _____ <input type="checkbox"/> Wet Vault _____ | Infiltration <input type="checkbox"/> Infiltration Basin _____ <input type="checkbox"/> Infiltration Trench _____ <input type="checkbox"/> Exfiltration Trench _____ <input type="checkbox"/> Retention/Irrigation _____ Other (describe): _____ <input type="checkbox"/> _____ |
| Detention <input type="checkbox"/> Extended Detention Basin _____ <input type="checkbox"/> Wet Pond _____ <input type="checkbox"/> Wetland _____ | | |
| 2. Is maintenance needed at this time? <input type="checkbox"/> Yes <input type="checkbox"/> No 3. *Mosquitoes or Mosquito Larvae Present? <input type="checkbox"/> Yes <input type="checkbox"/> No | | |
| 4. Comments/Notes: _____ | | |
| _____ | | |
| _____ | | |

| IV. FOLLOW-UP AND ENFORCEMENT ACTIONS (Add additional information on back) |
|--|
| |

Annual Reporting – Newly Installed Systems

- Must annually provide list of newly installed treatment and HM measures to Vector Control and Regional Water Board
- Information to be reported includes:
 - Name of facility/site where control measure is located
 - Address of facility/site
 - Party responsible for maintenance
 - Type of treatment/HM measure (does not include pervious pavement)

Annual Reporting – Summary of O&M Inspections

- Total no. of Regulated Projects
 - At the end of previous FY
 - At the end of reporting period (current FY)
- Total no. of Regulated Projects that had O&M verification inspections during current FY
- Percent of total Regulated Projects inspected during current FY
 - $[\text{No. inspected in current FY}] \div [\text{No. at end of previous FY}] \times 100\%$

Data Tracking

■ Database or Electronic Tabular Format

- Name of facility/site inspected
- Address and specific description of location of pervious pavement/treatment/HM controls
- Date of installation
- Owner and party responsible for maintenance
- Type and size of pervious pavement/stormwater treatment/HM control
- Date of inspection
- Type of inspection (installation, annual, follow-up, spot)
- Inspection findings/results
- Enforcement actions taken
- Comments/follow-up including corrective actions

For More Information...

- SF Bay Municipal Regional Stormwater Permit (Google it!)
 - Provision C.3.h
- SCVURPPP Website
 - www.scvurppp.org
 - Click on Elements, New Development and Redevelopment, Operation and Maintenance, OR go to Library

Questions?



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