

CITY OF GARDEN GROVE

NPDES STORMWATER PERMIT

LOCAL IMPLEMENTATION PLAN (LIP)

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A-1.0 INTRODUCTION

This document constitutes the City of Garden Grove's Local Implementation Plan (LIP) prepared as part of a compliance program pursuant to the California Regional Water Quality Control Board, Santa Ana Region, Order No. R8-2009-0030, NPDES No. CAS618030 (termed Fourth Term Permit).

This plan describes the activities that the City is undertaking to meet the requirements of the Fourth Term Permit and to make meaningful improvements in urban water quality. Although the LIP is intended to serve as the basis for City compliance during the five-year period of the Fourth Term Permit, the LIP is subject to modifications and updates as the City determines necessary, or as directed by the Regional Board.

A-1.1 BACKGROUND

The stormwater pollution control effort, of which this LIP is a part, is the result of three decades of legislative effort beginning with the 1972 Federal Water Pollution Control Act, subsequently known as the Clean Water Act (CWA). In 1987 the Water Quality Act brought stormwater discharges into the NPDES program and USEPA subsequently issued implementing regulations on November 16, 1990.

In response to these regulations the City of Garden Grove, County of Orange, the Orange County Flood Control District and the other incorporated cities of Orange County (collectively referred to as Permittees) have obtained, renewed and complied with NPDES Stormwater Permits from the Santa Ana and San Diego Regional Water Quality Control Boards. Each permit renewal has required the Permittees to continue to implement ongoing stormwater quality management programs and update and develop additional programs in order to control pollutants in stormwater discharges to the maximum extent practicable.

A-1.2 REGULATORY REQUIREMENTS

Section 402(p) of the CWA, as amended by the Water Quality Act of 1987, requires that municipal NPDES Permits include:

1. A requirement to effectively prohibit non-storm water discharges into municipal separate storm sewers; and
2. Controls to reduce the discharge of pollutants from municipal storm drains to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods, and such other provisions as the Administrator or the State determines appropriate for the control of such pollutants.

Regulations promulgated by EPA on November 16, 1990 (40 CFR 122.26 (d)(2)(iv)) require municipal NPDES permit applicants to develop a management program to effectively address these requirements. These also indicate that the proposed management program, such as the DAMP, "shall include a comprehensive planning process which involves public participation

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and where necessary intergovernmental coordination, to reduce the discharge of pollutants to the maximum extent practicable using management practices, control techniques and system, design and engineering methods, and such other provisions which are appropriate.”

A-1.3 OBJECTIVES OF THE LOCAL IMPLEMENTATION PLAN

The main objectives of this LIP are to fulfill the commitment of the City to present a plan that satisfies the requirements of its NPDES Permit and to evaluate and reduce the impacts of urban stormwater on the beneficial uses of receiving waters that the City drains to. This LIP, in conjunction with the DAMP, is the principal policy and guidance document for the City’s NPDES Stormwater Program. The LIP is structured using the same organization, by section, as the DAMP and includes the following programs in subsequent sections:

1. Framework for program management activities and future plan development (Section A-2.0 and Section A-3.0);
2. Legal authority for prohibiting non-permitted discharges to the storm drain system and for requiring BMPs in new development and significant redevelopment (Section A-4.0);
3. Municipal activities for pollution prevention and treatment to further reduce the amount of pollutants entering the storm drain system (Section A-5.0);
4. Educational program to communicate with the public about urban stormwater and non-stormwater pollution and obtain their support in implementing pollution prevention BMPs (Section A-6.0);
5. New development and significant redevelopment controls to incorporate appropriate and required post construction nonstructural and structural BMPs into the environmental planning and development review process (Section A-7.0);
6. Construction site controls that address appropriate and required practices for erosion and sediment control and on-site hazardous materials and waste management (Section A-8.0);
7. Existing development programs to prioritize, inspect and implement programs for commercial and industrial facilities (Section A-9.0);
8. Illegal discharges/illicit connections (ID/IC) program to detect and eliminate non-permitted discharges and unauthorized connections to the municipal storm drain system (Section A-10.0);
9. Monitoring programs for wet and dry weather to identify areas with water quality problems, to assist in the prioritization of watersheds for analysis and planning, and to assist in the prioritization of pollutants to facilitate the development of specific controls to address these problems (Section A-11.0); and

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10. Watershed scale initiatives will be developed further through the completion of watershed specific chapters (DAMP Appendix D) and programs that will be developed during the Fourth Term Permit (Section A-12.0).

A-1.4 PERMITTEE COMMITMENTS

The Permittees are also committed to maintaining the integrity of the receiving waters and their ability to sustain beneficial uses. As such, the Permittees have designed and implemented a countywide baseline stormwater management program in order to be able to continually reassess the conditions of the waters within Orange County and help determine the impact, if any, of urban stormwater discharges to the beneficial uses of those waters.

This baseline effort is complimented by the water quality planning process, which focuses resources on the impacts of urban stormwater discharges on beneficial uses, to assure that problems receive the available resources and attention. The Permittees have begun to prioritize these initiatives (Section 3) and will continue to analyze and evaluate the existing and future baseline monitoring program data to identify those watersheds exhibiting the most urgent need for attention.

A-1.5 DAMP/LIP COVERAGE

This LIP is applicable to the area of the City of Garden Grove within the jurisdiction of the Santa Ana Regional Board. The non-topographic boundary between Orange County and adjoining counties could result in certain Permittees being subjected to flows originating from or discharging to areas that are subject to separate NPDES municipal stormwater permits issued by the Regional Boards. The common drainage issues with Orange, Riverside and San Bernardino counties are being addressed through joint participation in integrated monitoring and research and program development initiatives.

A-1.6 DESCRIPTION OF DRAINAGE AREA AND CLIMATE

A-1.6.1 Geography and Climate

Orange County's climate has hot, dry summers and mild winters. Nearly all the annual precipitation falls in only a few storm events between October and April. During times of drought, it is not unusual for years to pass between major rainfalls. It is also common for successive storms of varying durations and intensities to compound their effects, with the heavy rainfall of the second or third storm creating the most severe flood conditions. On average, Orange County only receives a 12 to 13 inches of rain per year.

A-1.6.2 Watersheds

A watershed is an area of land where water drains through a series of creeks, rivers and bays into a common body of water often termed receiving water. The City of Garden Grove is

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located within the Anaheim Bay-Huntington Harbour watershed and a small portion of the east side of the City resides in the Santa Ana watershed.

Figure A-1.1 Regional Map – City of Garden Grove, Anaheim Bay-Huntington Harbour Watershed (<http://www.ocwatersheds.com/AnaheimBayHuntingtonHarbour.aspx>)



Figure A-1.2 Regional Map – City of Garden Grove, Santa Ana River Watershed (<http://www.ocwatersheds.com/SantaAnaRiver.aspx>)



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A-1.6.3 Environmentally Sensitive Areas (ESAs)/Impaired Waters

Environmentally Sensitive Areas (ESAs)

Although the Santa Ana Permit does not include a definition of ESA's, for the purposes of this LIP, the following categories have been included as ESA's:

- CWA Section 303(d) impaired waters; and
- Areas tributary to or within 500 feet of an Area of Special Biological Significance.

The ESAs identified in the City are listed in **Table A-1.1**.

CWA Section 303(d) Water Quality Limited Segments of Receiving Waters

Under Section 303(d) of the CWA, states are required to develop lists of water quality limited segments of receiving waters (impaired waters). These impaired waters do not meet water quality standards or support designated water uses. The 2010 303(d) list of water quality limited segments (**Table A-1.1**) has been sent to USEPA Region IX and is now awaiting final approval. Once the list is formally approved by EPA, **Table A-1.1** will be amended as necessary.

Table A-1.1.
Watersheds, ESAs, 303(d) Pollutants and TMDL status for Waterbodies in City of Garden Grove

Watershed	Hydrologic Area/Sub-Area	Waterbody	ESA	303(d) Pollutant/Stressor	TMDL Status
<i>Santa Ana Region</i>					
Anaheim Bay-Huntington Harbour	East Coastal Plain HSA 801.11	Anaheim Bay		Dieldrin, Nickel, PCBs, Sediment Toxicity	Proposed TMDL Completion 2019
Anaheim Bay-Huntington Harbour	East Coastal Plain HSA 801.11	Huntington Harbour		Chlordane, Copper, Lead, Nickel, Pathogens, PCBs, sediment toxicity	Proposed TMDL Completion 2019

Source: State Water Resources Control Board

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These impaired waters are shown in the maps attached as **Exhibit A-1.I**.

A-1.7 MODEL PROGRAMS

Since 1990, the City has cooperated with the County of Orange, the Orange County Flood Control District and the other cities in Orange County (the Permittees) in complying with the National Pollutant Discharge Elimination System (NPDES) permits issued by the Santa Ana and San Diego Regional Water Quality Control Boards. The result of this cooperation has been the iterative development of the eleven model stormwater program elements (see **Section A-1.6**) that comprise the area-wide Drainage Area Management Plan (DAMP).

The DAMP was first completed in 1992 and approved by the Santa Ana Regional Board in 1994 and the San Diego Regional Board in 1996. The current structure of the DAMP was completed in 2003 at which time the DAMP was expanded to the following appendices:

- Appendix A - The Local Implementation Plans developed by the Permittees
- Appendix B - Education, Training and Outreach Component
- Appendix C - Program Effectiveness Assessment Component
- Appendix D - Watershed Components (to be developed)
- Appendix E - Technical Reports

In developing this LIP, the City of Garden Grove has utilized the DAMP as the foundation for its program development and the two documents, in effect, act as companion parts of the City's compliance program.

A-1.8 PROGRAM ASSESSMENT AND MODIFICATION

The Program Effectiveness Assessment is the foundation for the Annual Progress Report that is submitted each year to the Regional Boards. This report presents an evaluation of this LIP which is used to determine where modifications within the program may be necessary. It also ensures that the iterative evaluation and improvement process is applied to each of the program components and is used as an effective management tool (See **Section A-3.0**).

SECTION A-2, PROGRAM MANAGEMENT

A-2.0 PROGRAM MANAGEMENT

A-2.1 INTRODUCTION

Program management activities conducted by the City of Garden Grove to implement the LIP involve the following activities:

- Coordination with the Principal Permittee and other Permittees on program development through the DAMP; common program implementation (such as monitoring, public education and watershed programs); fiscal resources for shared budgets under the Implementation Agreement; and overall program direction.
- Coordination with internal City departments to implement the LIP.
- Fiscal analysis in preparing, approving and tracking shared cost budgets prepared by the Principal Permittee and individual cost budgets prepared by the City.
- Data management and compliance reporting based on common practices specified in the DAMP.

This section addresses these issues.

A-2.2 MAJOR MANAGEMENT ACTIVITIES

Implementation of the LIP and related DAMP programs is overseen by the Environmental Compliance Division, which coordinates the development, implementation and administration of the stormwater program for the City overall. In this capacity the Environmental Compliance Division is the lead department responsible for LIP and DAMP development, implementation, compliance, fiscal analysis, and reporting.

In addition to managing internal implementation, the Environmental Compliance Division also participates with the County of Orange, Orange County Flood Control District, and other Orange County cities in the countywide NDPES Stormwater Program as described in the DAMP.

A-2.2.1 Management Framework

Management of the countywide program is performed through a committee structure with responsibilities and chairing assigned selectively to the Principal Permittee and the Permittees. These committees are as follows:

- City Manager's Water Quality Committee: provides budget and overall program review and governance direction; comprised of several City Managers and is attended by County staff.

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- City Engineer's Technical Advisory Committee (TAC): serves in a program advisory role to the Permittees and implements policy previously established by the permittees. The TAC is comprised of a City Engineer, or selected representative, from one city in each of the County Supervisorial Districts and a representative from the County of Orange.
- Technical Advisory Committee/Planning Advisory Committee (TAC/PAC) serves in a program advisory role to the Permittees and implements policy previously established by the permittees pertaining to land development. The TAC/PAC is comprised of a City Engineer, or selected representative and a Planning Director or selected representative, from one city in each of the County Supervisorial Districts and a representative from the County of Orange.
- General Permittee Committee: provides a countywide forum to update designated representatives from each Permittee on program development.
- Sub-Committees/Task Forces/Advisory Groups:
 - Legal/Regulatory Authority Task Force
 - Local Implementation Plan/Program Effectiveness Assessment (LIP/PEA) Sub-Committee
 - Public Education Sub-Committee
 - Permittee Advisory Group
 - Trash and Debris Task Force
 - Water Quality Ordinance Authorized Inspectors Sub-Committee
 - Water Quality Monitoring & Science Task Force

The City participates in these committees through the representatives shown in Table A-2.1:

Table A-2.1
City of Garden Grove Participation in Countywide Program

Committee/Task Force	City Department/Division
General Permittee Committee	Public Works/Environmental Compliance Division
LIP/PEA Sub-Committee	Public Works/Environmental Compliance Division
Public Education Sub-Committee	Public Works/Environmental Compliance Division
Authorized Inspectors Sub-Committee	Public Works/Environmental Compliance Division

The responsibilities of the City departments for the internal coordination of LIP activities are shown in Table A-2.2.

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
Section A-2 - Program Management	Public Works- Environmental Compliance	Serves as City LIP manager	Prepares annual compliance reports
			Reviews shared budgets and prepared internal City budgets
			Coordinates with Principal Permittee and other Permittees for development and implementation of countywide program
			Coordinates/ensures implementation of LIP by City departments; administers program
			Responds to phone, e-mail, and other input to the City on water quality issues and dispatches appropriate personnel; records responses
			Follows up on problems with City compliance
Section A-3 - Plan Development	Public Works- Environmental Compliance	Oversees development of new 2003 DAMP programs	Coordinates between City departments and the Principal Permittee in the development of new programs and BMP effectiveness studies
Section A-4 - Legal Authority	City Manager- City Attorney	Certification of adequate legal authority	Reviews legal authority/modifications of ordinances/ legal certification

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
Section A-5 - Municipal Activities	Public Works-Street and Street Trees	Manages storm drain inventory/atlas	Updates or provides Geographic Information System (GIS) with updates to storm drain atlas
	Public Works-Street and Street Trees	Operates and maintains storm drains and flood control facilities	Implements applicable model BMPs, reports actions taken to LIP Management
			Reports to LIP Manager with changes in flood control maintenance program and facilities
	Public Works-Parks and Facilities	Operates and maintains corporate/ municipal yards	Implements applicable model BMPs, reports actions taken to LIP Management
			Reports to LIP Manager with changes in corporate/ municipal yards
	Public Works-Streets and Street Trees	Maintains catch basin stenciling program	Implements stenciling program, reports actions taken to LIP Management
			Reports to LIP Manager with changes in stenciling program
	Fire-Operations	Generates emergency and non-emergency fire fighting discharges	Implements applicable model BMPs, reports actions taken to LIP Management
	Public Works-Facilities and Fire	Operates and maintains fire stations	Implements applicable model BMPs, reports actions taken to LIP Management
			Reports to LIP Manager with changes in fire facilities operated

SECTION A-2, PROGRAM MANAGEMENT

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
	Public Works-Parks and Facilities	Operates parks, community centers, and recreational facilities	Implements applicable model BMPs, reports actions taken to LIP Management operated
			Reports to LIP Manager with changes in parks facilities
	Police and Public Works-Facilities	Operates and maintains police facilities	Implements applicable model BMPs, reports actions taken to LIP Management
			Updates LIP Manager with changes in police facilities operated
	Public Works-Streets and Street Trees	Operates and maintains parking lots	Implements applicable model BMPs, reports actions taken to LIP Management
			Updates LIP Manager with changes in parking facilities operated
	Public Works-Water Services	Operates wastewater facilities	Implements applicable model BMPs, reports actions taken to LIP Management
			Updates LIP Management with changes in wastewater facilities operated
	Public Works-Water Services	Operates water facilities	Implements applicable model BMPs, reports actions taken to LIP Management
			Updates LIP Management with changes in water facilities operated
	Public Works-Parks and Facilities	Maintains city facilities	Implements applicable model BMPs, reports actions taken to LIP Management

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
			Updates LIP Management with changes to City-owned facilities
	Public Works-Vehicle Maintenance	Manages and maintains city vehicle programs	Implements applicable model BMPs, reports actions taken to LIP Management
			Updates LIP Management with changes to city vehicle programs
	Public Works-Streets and Street Trees	Manages and implements street sweeping	Implements applicable model BMPs, reports actions taken to LIP Management
			Updates LIP Management with changes to street sweeping
	Public Works-Parks and Facilities	Manages and implements IPM Policy	Implements IPM Policy, reports actions taken to LIP Management
			Updates LIP Management with changes to pesticide and fertilizer programs for conformance with IPM Policy
	Public Works-Parks and Facilities	Manages and implements landscape maintenance programs including lakes	Implements applicable model BMPs, reports actions taken to LIP Management
			Updates LIP Management with changes to landscape maintenance programs

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
	Public Works-Parks and Facilities and Streets and Street Trees	Manages and implements waste recycling and litter control programs	Implements applicable model BMPs, reports actions taken to LIP Management
			Updates LIP Management with changes to waste recycling and litter control programs
Section A-6 - Public Education	Public Works-Environmental Compliance	Manages education/outreach program	Attends public meetings
			Provides training and guidance materials to private developers, public, and City staff
			Disseminates information in the City
			Develops City versions of countywide education materials as appropriate
			Participates in one City event per year

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
	Public Works-Environmental Compliance, Engineering /Community Development-Planning, Building Services/Finance-Business Operations/Community Services-Leisure Services	Distribution of public education materials	Provides information to public at City counters
Section A-7 - New Development	Public Works-Environmental Compliance, Engineering /Community Development-Planning	Manages General Plan	Reviews the General Plan for water quality protection
	Public Works-Engineering /Community Development-Planning	Manages environmental planning review	Implements use of CEQA checklist to review water quality issues on proposed projects
			Reviews development for water quality issues

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
	Public Works-Engineering /Community Development-Planning	Processes building/grading permits	Advises applicants of water quality requirements
			Verifies plan compliance with water quality requirements
			Coordinates with Environmental Compliance for project tracking and inspection of water quality requirements
	Public Works-Engineering	Interacts with public	Provides information to permit applicants on water quality requirements
	Public Works-Engineering /Community Development-Planning	Manages public works projects	Verifies plan compliance with water quality requirements in public works projects
			Coordinates with Environmental Compliance for project tracking and inspection of water quality requirements in public works projects
Section A-8 - Construction	Public Works-Engineering /Community Development-Building Services	Processes building/grading permits	Advises applicants of water quality requirements

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
			Verifies plan and NOI compliance with water quality requirements, reports actions taken to LIP Management
	Public Works-Engineering	Manages oversight of construction inspection inventory, prioritization and inspection program	Inventories, prioritizes and maps construction sites
			Implement inspections, requires corrective actions to be taken, reports actions taken to LIP Management
	Public Works-Engineering / Community Development-Planning	Manages Public works projects and Capital Improvement Project (CIP) projects	Verifies plan compliance with water quality requirements in public works projects and CIPs
			Coordinates with Environmental Compliance for project tracking and inspection of water quality requirements in public works projects and CIPs, reports actions taken to LIP Management
Section A-9 - Existing Development	Public Works-Environmental Compliance	Manages oversight of the commercial, industrial, residential inspection program	Inventories, prioritizes and maps facilities
			Implement inspections, require corrective actions to be taken, report actions taken to LIP management

SECTION A-2, PROGRAM MANAGEMENT

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
	Finance-Business Operations Tax	Manages business license application process	Provides commercial and industrial information for the inventory to LIP Manager
	Public Works-Environmental Compliance, Engineering /Community Development-Planning, Building Services/Finance-Business Operations/Community Services-Leisure Services	Interacts with businesses and the public	Provides information to industrial and commercial businesses and the public
Section A-10 – ID/IC	Public Works/Fire /Police/Community Development	Operates and performs field activities	Reports dumped materials and/or undocumented connections
	Public Works-Environmental Compliance	Manages education/outreach program	Distributes public education materials to encourage the reporting of problems

SECTION A-2, PROGRAM MANAGEMENT

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
	Public Works-Engineering, Environmental Compliance	Implements construction site inspections	Reports violations of and/or enforce the water quality ordinance
	Public Works-Environmental Compliance	Implements the existing development inspections	Report violations of and/or enforces the water quality ordinance
	Public Works-Environmental Compliance	Processes notifications/ response requests for water pollution problems	Detects and eliminates illegal discharges and illicit connections
	Public Works-Environmental Compliance	Responds to water pollution complaints	Responds to water pollution complaints in a timely manner and enforce all applicable ordinances
	Public Works-Environmental Compliance	Responds to water pollution complaints	Responds to water pollution complaints in a timely manner and enforce all applicable ordinances
	Public Works-Environmental Compliance	Responds to water pollution complaints, assesses site, makes notifications, oversees clean-up operations and enforces water quality ordinance	Responds to water pollution complaints in a timely manner and enforces all applicable ordinances

Table A-2.2
City of Garden Grove Internal Implementation of the LIP

Program Element	Department	Activity	Responsibility Under the Order/ DAMP
	Public Works-Environmental Compliance	Manage water quality data received from countywide program	Initiates source investigations through ID/IC program for problems identified through the water quality monitoring program
	City Managers-City Attorney	Assists with the enforcement of violations of applicable ordinances	Enforces against violators of stormwater related ordinances
Section A-11 - Water Quality Monitoring	Public Works-Environmental Compliance	Assesses water quality data received from countywide program	Assesses data to determine if Initiate follow up through ID/IC program for problems identified through the water quality monitoring program need to be followed up on

A-2.2.2 Agreement for Program Implementation

An Implementation Agreement among the 36 Permittees defines the roles, responsibilities, and cost sharing formulas governing the program. The City executed the updated cooperative agreement on June 25, 2002 (see DAMP Section 2.I for a copy of the Agreement).

A-2.2.3 NPDES Permit Responsibilities

The responsibilities of the County of Orange as the Principal Permittee and Permittees as a whole are defined within the Implementation Agreement, the NPDES Permits, or as otherwise identified within separate funding agreements.

The City of Garden Grove is responsible for the management of storm drain systems within its jurisdictions and is:

- Implementing management programs, monitoring programs, implementation plans and all BMPs outlined in the DAMP/LIP within its jurisdiction, and taking any other actions as may be necessary to meet the MEP standard.
- Coordinating among their internal departments and agencies, as appropriate, to facilitate the implementation of this order and the DAMP/LIP.

SECTION A-2, PROGRAM MANAGEMENT

- Establishing and maintaining adequate legal authority, as required by the Federal Storm Water Regulations.
- Conducting storm drain system inspections and maintenance in accordance with the criteria developed by the Principal Permittee.
- Taking appropriate enforcement actions for illicit discharges to the MS4 systems owned or controlled by the City.

Additional activities include, but are limited to, the following:

- Participating in the General Permittee Committee comprised of the Principal Permittee and one representative of each Permittee.
- Reviewing, approving, implementing, and commenting on all plans, strategies, management programs, and monitoring programs, as developed by the Principal Permittee or any Permittee subcommittee to comply with this order.
- Pursuing enforcement actions as necessary to ensure compliance with the stormwater management programs, ordinances and implementation plans, including physical elimination of undocumented connections and illicit discharges to drainage systems owned or controlled by the Permittees.
- Conducting and coordinating with the Principal Permittee any surveys and characterizations needed to identify pollutant sources and drainage areas.
- Submitting storm drain system maps, including any periodic revisions, with each annual report.
- Responding to emergency situations, such as accidental spills, leaks, illicit discharges, illicit connections, etc., to prevent or reduce the discharge of pollutants to storm drain systems and Waters of the US.
- Preparing and submitting all required reports to the Principal Permittee in a timely manner.
- Reviewing, approving and commenting on budgets, plans, strategies, management programs and monitoring programs developed by the Principal Permittee, sub-committees or task forces.

A-2.2.4 NPDES Reporting Requirements

Appendix C of the DAMP now forms the reporting and program assessment component and reflects the format of the DAMP. The reporting format and requirements for the information to

SECTION A-2, PROGRAM MANAGEMENT

be collected and submitted within Appendix C supports preparation of an Annual Progress Report that comprises:

- A review of the status of program implementation and compliance (or non-compliance) with the Permit;
- An assessment of the effectiveness of control measures established under the illicit discharge elimination program and the Drainage Area Management Plan;
- An overall program assessment that may be based on the California Stormwater Quality Association May 2007 guidance for assessing program activities at the various outcome levels or other methodology;
- A plan and schedule to address program modifications and improvements identified during the program assessment;
- A summary and analysis of monitoring results from the previous year and any changes to the monitoring program for the following year;
- A unified fiscal accountability analysis;
- Major changes in any previously submitted plans/policies; and
- An assessment of the Permittees compliance status with the Receiving Water Limitations, including any proposed modifications to the DAMP if the Receiving Water Limitations are not fully achieved.

In addition to the Annual Progress Reports, the required submittals may also include any other requirements specified by the Regional Boards pursuant to permit conditions, California Water Code Section 13225 and 13267, or other regulatory provisions. In preparing the Annual Progress Reports, the City will be coordinating with the Principal Permittee and other Permittees to develop common data management and tracking tools.

A-2.2.5 Fiscal Analysis

Effective programs require adequate funding to implement planned activities. Since the adoption of the permits, the City has provided funding for the countywide shared-cost budget and jurisdictional compliance activities. The City uses the reporting format shown in Tables A-2.3, A-2.4 and A-2.5 to report on capital, operations and maintenance and funding sources in the annual progress report.

Table A-2.3
Fiscal Analysis for City Capital Costs

City of Garden Grove		CAPITAL COSTS	
Fiscal Analysis Summary		(land, large equipment, and structures)	
DAMP Program Elements		Current FY Costs	Projected FY Costs
Supportive of Program Administration (DAMP Section 2.0)		This information will be collected annually in Section C-2 of DAMP Appendix C	This information will be collected annually in Section C-2 of DAMP Appendix C
MUNICIPAL ACTIVITIES (DAMP Section 5.0)	Litter Control		
	Recycling		
	Drainage Facility Maintenance		
	Catch Basin Stenciling		
	Street Sweeping		
	Environmental Performance		
	Public Property & Street Chemical Spill Response		
	Pesticide & Fertilizer Management		
PUBLIC INFORMATION (DAMP Section 6.0)	Nonpoint Source Pollution Awareness		
	Household Hazardous Waste Collection		
REQUIRING NEW DEVELOPMENT BMPS (Supportive of Planning, etc.)			
REQUIRING CONSTRUCTION BMPS (Supportive of Plan Check & Inspection)			
ILLICIT CONN./ DISCHARGE ID & ELIMINATION (DAMP Sec. 10.0)	Facility Inspection		
	Other Efforts to Identify & Eliminate Illicit Connections		
BMPS INCORPORATED INTO PUBLIC WORKS CAPITAL PROJECTS			

SECTION A-2, PROGRAM MANAGEMENT

TOTALS		
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Table A-2.4
Fiscal Analysis for City Operations and Maintenance Costs

City of Garden Grove		OPERATIONS AND MAINTENANCE			
Fiscal Analysis Summary					
DAMP Program Elements		Current FY Costs	Projected FY Costs		
Supportive of Program Administration (DAMP Section 2.0)		This information will be collected annually in Section C-2 of DAMP Appendix C	This information will be collected annually in Section C-2 of DAMP Appendix C		
MUNICIPAL ACTIVITIES (DAMP Section 5.0)	Litter Control				
	Recycling				
	Drainage Facility Maintenance				
	Catch Basin Stenciling				
	Street Sweeping				
	Environmental Performance				
	Public Property & Street Chemical Spill Response				
	Pesticide & Fertilizer Management				
PUBLIC INFORMATION (DAMP Section 6.0)	Nonpoint Source Pollution Awareness				
	Household Hazardous Waste Collection				
REQUIRING NEW DEVELOPMENT BMPS (Supportive of Planning, etc.)					
REQUIRING CONSTRUCTION BMPS (Supportive of Plan Check & Inspection)					
ILLCIT CONN./	Facility Inspection				

SECTION A-2, PROGRAM MANAGEMENT

DISCHARGE ID & ELIMINATION (DAMP Sec. 10.0)	Other Efforts to Identify & Eliminate Illicit Connections		
BMPS INCORPORATED INTO PUBLIC WORKS CAPITAL PROJECTS			
TOTALS			

Table A-2.5
Fiscal Analysis for City Funding Sources

City of Garden Grove Fiscal Analysis Summary	FUNDING SOURCES	
DAMP FUNDING SOURCES	FUNDING PERCENTAGES	
	Current FISCAL YEAR	Next FISCAL YEAR
GENERAL FUND	This information will be collected annually in Section C-2 of DAMP Appendix C	This information will be collected annually in Section C-2 of DAMP Appendix C
UTILITY TAX/CHARGES		
SEPARATE UTILITY BILLING ITEM		
GAS TAX		
SPECIAL DISTRICT FUND		
OTHERS (Specify)		
Sanitation Fee		
Benefit assessment		
Fleet Maintenance Fund		
Community Services District		
Water Fund		
Sewer & Storm Drain Maintenance Fee		
Grants		
TOTALS (must add up to 100%)		

A-2.2.6 Program Representation



SECTION A-2, PROGRAM MANAGEMENT

The Principal Permittee represents the Permittees on the California Stormwater Quality Association (CASQA), the Stormwater Monitoring Coalition, Southern California Coastal Water Research Project (SCCWRP), and other stormwater forums.

A-3.0 PLAN IMPROVEMENT AND WATERSHED PLANNING

The plan improvement and watershed planning component of this plan is composed of the following elements:

1. **Section A-3.1**, Introduction
2. **Section A-3.2**, Regulatory Requirements
3. **Section A-3.3**, Plan Development
4. **Section A-3.4**, Funding of Structural Controls
5. **Section A-3.5**, Employee Training and Outreach

A-3.1 INTRODUCTION

This Section describes the approach taken by the City in developing and updating the Local Implementation Plan (LIP) to maintain a responsive compliance program. Program updates are informed by an iterative feedback process to address high priority water quality problems by revising, adding or deleting BMPs and activities in response to performance assessment and research. This feedback loop forms the framework for revision and improvement of the program documents.

A-3.2 REGULATORY REQUIREMENTS

The requirement for iterative consideration and implementation of new or modified BMPs is principally established in Section IV. of Order No. R8-2009-0030.

A-3.3 PLAN DEVELOPMENT

A-3.3.1 Approach to Plan Development and Improvement

The Principal Permittee, in conjunction with the City and the other Co-Permittees, have developed a comprehensive framework for storm water management, described in the Drainage Area Management Plan (DAMP), which is updated as appropriate in conjunction with the Report of Waste Discharge and each new Municipal Permit's findings and requirements. The DAMP sets forth a model programmatic County-wide approach for urban stormwater management on two basic levels:

- Establishing a baseline set of source control BMPs and activities that are considered proven and cost-effective, and are recommended for inclusion or reference in the Co-Permittees' LIPs at the *local jurisdictional MS4 level*. The LIP primarily addresses non-structural and pollution prevention controls applicable to on-site or in the MS4, as well as localized structural BMPs, as required by Order No. R8-2009-0030 and as further determined appropriate by the City.

- Establishing a framework collective action at the *multi-jurisdictional watershed level*., focusing on solving water quality and beneficial use problems in receiving waters, and documenting issues and progress through the Watershed Work Plans (WWP) compiled by the Principal/Lead Permittee with input by the Co-Permittees. The WWPs primarily address watershed-wide source control initiatives, interjurisdictionally-coordinated structural BMPs, and receiving-water restoration efforts

A-3.3.2 Methodology for Examining Retrofit Opportunities

[Reserved]

A-3.3.3 BMP Selection and Effectiveness Assessment

The 2006 Report of Waste Discharge, the region-wide Annual Unified Reports, the City's Annual LIP PEA Reports, provide a history of program and BMP activities implemented and progress in meeting water quality standards. The City's current baseline BMPs to reduce, eliminate or mitigate pollutant impacts are summarized in **Sections A-5.0** through **A-10.0**. Inter-jurisdictional watershed BMP efforts are summarized in **Section A-12.0**.

New or modified BMPs may be considered on a localized basis or for broader scale implementation. In order to assure that resources for pollution prevention and removal BMPs are strategically expended, the City typically evaluates any potential new structural or preventative BMP technologies or practices on a limited scale, or consults evaluations conducted by others, before considering broader-scale implementation. Implementation is pursued in a prioritized manner on a schedule consistent with available resources. After pilot and/or broader implementation, local effectiveness is assessed to determine if further adjustments or modifications are needed to the BMP implementation or program priorities. These iterative efforts are discussed and reported in the Annual Jurisdictional Work Plan progress updates submitted with the Annual LIP PEA Report.

BMP effectiveness assessment may be characterized via direct or indirect evidence at one or more of the six CASQA outcome levels described in **Section A-3.3.3**. The BMP selection and effectiveness assessment process may include, but is not limited to, input from the following factors and information sources, as available and applicable:

- A review of technical literature (such as the ASCE/EPA databases)
- A review of existing control programs
- Demonstration or research projects by City or other entities
- Input from vendors, consulting firms, other municipalities, or other agencies
- Water quality and flow data and modeling,
- User and operational/maintenance staff feedback
- Opinion surveys
- Beneficial Use assessment

SECTION A-3, PLAN IMPROVEMENT AND WATERSHED PLANNING

- Cost and cost/benefit
- Technical feasibility
- Acceptability by the community
- Ease or difficulty of implementation
- Maintenance requirements
- Pollutant prevention/removal performance
- Multiple resource benefits or impacts

DAMP Section 3.0 describes a program evaluation framework that is based on the California Stormwater Quality Association (CASQA) method, which defines a hierarchy of potential outcomes at six levels:

- Level 1 - Compliance with Activity-Based Permit Requirements
- Level 2 - Changes in Attitudes, Knowledge & Awareness
- Level 3 - Behavioral Change & BMP Implementation
- Level 4 - Load Reductions
- Level 5 - Changes in Urban Runoff & Discharge Quality
- Level 6 - Changes in Receiving Water Quality

Monitoring and Reporting Order No. R8-2009-0030 requires the City's LIP to consider the CASQA hierarchy to establish quantitative and/or qualitative assessment measures or methods targeting water quality results, municipal activities, and other program components; commit to conducting the measures and evaluating both the outcomes and the assessment strategies; and commit to identify and implement program modifications and improvements needed to maximize LIP effectiveness at meeting the following objectives:

- Reduce stormwater pollutant loadings to 303(d) waterbodies;
- Prevent stormwater MS4 discharges from causing or contributing to conditions of pollution, nuisance or contamination;
- Comply with the requirement to take iterative actions to protect receiving water limitations; and
- Comply with Permit requirements for each major program component.

Attached **Exhibit A-3.I** identifies the program assessment measures developed by the Co-Permittees for the Fourth Term Permit, which are expected to be conducted annually by the City for each of the objectives. The assessments may be adapted or modified over the Permit term to improve their usefulness. Assessment findings are reported annually with the Annual LIP PEA Report. Any modifications to the program or to programmatic assessment methods are also reported annually, with corresponding revisions made to the LIP as appropriate.

Jurisdictional BMP Investigations

The City may participate with the Principal Permittee and other Permittees on studies to evaluate the effectiveness and applicability of specific BMPs. It is anticipated that these studies will result in improved knowledge and the potential modification of BMPs cited in the DAMP

and incorporated into this LIP. The studies being undertaken during the period of the Third Term Permits included:

- BMP Effectiveness and Applicability Evaluation for Orange County;
- Trash and Debris BMP Evaluation;
- Erosion Control BMP Effectiveness Studies;
- Assessment of Septic Systems on Stormwater Quality;
- Portable Toilet Oversight Program;
- Dry Weather Diversion Plan; and

Improvements in Stormwater Science

The City is collaborating, through the Principal Permittee, in the Stormwater Monitoring Coalition (SMC) on studies that may shape plan development and the selection of future BMPs as well as improving the City's understanding of stormwater science.

A-3.3.4 Plan Revision

Annual progress updates to the LIP are submitted with the Annual LIP PEA Report to summarize proposed BMP and programmatic adaptations. Program assessment and iterative BMP findings, as well as any modifications to the program or to programmatic assessment methods, are reported, along with any corresponding revisions made to the LIP, as appropriate. The DAMP will be revised and submitted by the Principal Permittee as the proposed plan for each Report of Waste Discharge. The LIP is a more dynamic document plan that is evaluated on at least an annual basis by the City or as directed by the Regional Board.

A-3.4 FUNDING OF STRUCTURAL CONTROLS

[Reserved]

A-3.5 EMPLOYEE TRAINING AND OUTREACH

The City will provide or require educational activities and training for its direct employees as described in subsequent sections for each programmatic element. The Principal Permittee will coordinate, develop and present a number of different training modules (**DAMP Appendix B**). The modules will be substantially updated in 2010-11 to reflect the requirements of the Fourth Term Permits. The City will support this effort by requiring the appropriate employees attend training sessions and conduct applicable train-the-trainer sessions, if necessary. Required employee training is summarized below in **Table A-3.2**.

Table A-3.2
Required Employee Training

Division	Key Responsibilities	Required Training
Engineering	New Development and Redevelopment, Construction inspections, WQMP BMP verification during construction	Annual construction inspector training (Section 8),
Streets: Asphalt/ Concrete	Street asphalt and concrete	Annual municipal BMP and ID/IC training (Section 5 & 10)
Streets: Right of way	Spill response, street sweeping, parking control, ROW maintenance	Annual municipal BMP and ID/IC training (Section 5 & 10)
Streets: Street trees and flood control	Tree maintenance, storm drain and flood control channel maintenance	Annual municipal BMP and ID/IC training (Section 5 & 10)
Water: Production and Distribution	Installation, repair and maintenance of the water distribution system, treatment of drinking water	Annual municipal BMP and ID/IC training (Section 5 & 10)
Sanitation	Installation, repair and maintenance of the sewer system, spill response	Annual municipal BMP and ID/IC training (Section 5 & 10)
Facilities: Building Maintenance and Custodial	Maintenance of City facilities	Annual municipal BMP and ID/IC training (Section 5 & 10)
Facilities: Parks	Park maintenance, median maintenance, IPM implementation	Annual municipal BMP and ID/IC training (Section 5 & 10)
Vehicle Maintenance	Fleet vehicle maintenance, wash rack maintenance, hazardous waste management	Annual municipal BMP and ID/IC training (Section 5 & 10)
Environmental Compliance	Spill response, ID/IC enforcement, NPDES	Construction inspector training (Section 8),

	inspection of commercial, industrial, construction and WQMP,	Authorized inspector training (Section 9)
Contracted Inspectors	CIP construction inspections	Annual construction inspector training (Section 8), BMP and ID/IC training. (Section 5 & 10)

Additional Program Implementation Effort (2010-2011 PEA):

Continued interdepartmental coordination to ensure all contracted inspectors and new hires are trained within 60 days of employment for those positions that are involved with municipal storm water BMPs.

Some of the CASQA pyramid outcomes for each of the Stormwater Program components were conducted. Further revision and evaluation of achievable and realistic goals need to be conducted. It is anticipated that CASQA will release a new and updated guidance document for evaluating municipal stormwater programs.

Exhibit A-3.I

Program Assessment Measures

The assessment of the City of Garden Grove's stormwater program implementation is based off of the CASQA Municipal Stormwater Program Effectiveness Assessment Guidance (2007). These assessments are also included as part of the annual Program Effectiveness Assessment document.

LIP Section	CASQA Outcome	Assessment	Goal	Time Frame
Municipal Operations, Section 5	Level 1 Level 2	Level 1: All municipal facilities are in a database. All municipal facility and field activities inspections are documented. Documented maintenance activities of MS4 in GIS based system.	Provide training to City Hall Staff. Improve key stormwater concepts to field staff by 10%.	With in 1 year.
		Level 2: Increase the number of employees attending employee training		
Public Education, Section 6	Level 1 Level 3 Level 4	Level 1: All outreach activities are documented. Increased the total number and participating in higher quality impressions (through direct outreach, training sessions etc.)	Conduct outreach to specific industrial and commercial sectors; create public education materials in Korean and Vietnamese.	Within 2 years
		Level 3: 75% BMP implementation at commercial and industrial facilities.		
		Level 4: Reduction in waste removed from channels.		

LIP Section	CASQA Outcome	Assessment	Goal	Time Frame
New Development, Section 7	Level 1 Level 2	Level 1: WQMP database developed, all inspections are documented with follow up letters sent to property owners.	Improve understanding of WQMP BMP implementation requirements to property owners; improve BMP maintenance activities by property owners. Increase the number of LID design principles. Improve insurance that grading plan BMPs are reflected in approved project WQMPs.	Within 1 year
		Level 2: All planners in Community Development are aware of BMP requirements, including LID requirements		
Construction, Section 8	Level 1 Level 3	Level 1: All construction sites are in a database, all construction site inspections were documented, 4 training sessions held	Increase construction site inspections and improve documentation of enforcement actions. Improve inspector awareness of BMP implementation.	Within 1 year
		Level 3: Follow up inspections show an improvement in BMP implementation		
Industrial and Commercial, Section 9	Level 1 Level 3	Level 1: All commercial and industrial businesses required to be inspected are tracked in a database.	Ensure all facility inspection requirements are met. Conduct required follow up inspections.	Within 1 year
		Level 3: BMP implementation has improved at commercial and industrial facilities.		
Illegal Discharges and Illicit Connections, Section 10	Level 1	Level 1: NPDES violations and follow up actions are documented. Identify new illicit connections with GIS based program.	Improve public reporting of ID/IC by 20%.	With in 2 years.

SECTION A-4, LEGAL AUTHORITY

A-4.0 LEGAL AUTHORITY

A-4.1 INTRODUCTION

In 1993, the Orange County Permittees prepared a Model Water Quality Ordinance to provide a more uniform, countywide approach and a legal underpinning to the area-wide stormwater program. Subsequently, the City of Garden Grove adopted a largely similar version of the Water Quality Ordinance as Ordinance Number 2401 and provided certifications of their adoption to the Regional Board in 1997. A corresponding Enforcement Consistency Guide (DAMP Exhibit 4.I) was also developed and implemented by the Permittees in 1997 to accompany the ordinance, and is described in further detail in Section A-4.4.

A-4.2 REGULATORY REQUIREMENTS

The Fourth Term Permit, Santa Ana Regional Water Quality Control Board (RWQCB) Order No. R8-2009-0030, Section VI, requires the City to maintain adequate legal authority to control the discharge of pollutants to the MS4s from urban runoff and enforce those authorities. This may be accomplished through ordinance, statute, permit, contract or similar means.

A-4.3 AUTHORITY TO CONTROL POLLUTANT DISCHARGES

The City's Water Quality Ordinance is the principal legal foundation of the City's water quality/pollution prevention program. This legal authority enables the city to:

- Control the contribution of pollutants in discharges of runoff associated with industrial and construction sites;
- Prohibit all identified illicit discharges not otherwise allowed;
- Prohibit and eliminate illicit connections to the MS4;
- Control the discharge of spills, dumping or disposal of materials other than storm water into its MS4;
- Require compliance with conditions in City's ordinance, permits, contracts or orders;
- Utilize enforcement mechanisms to require compliance with storm water ordinances, permits, contracts, or orders;
- Control the contribution of pollutants from one portion of the MS4 to another portion of the MS4 through interagency agreements among other MS4 owners;
- Carry out all inspections, surveillance, and monitoring necessary to determine compliance and noncompliance with local ordinance and permits and with this Order, including the prohibition on illicit discharges to the MS4;
- Require the use of BMPs to prevent or reduce the discharge of pollutants into the MS4s from storm water to the maximum extent practicable (MEP); and

SECTION A-4. LEGAL AUTHORITY

- Require documentation on the effectiveness of BMPs implemented to reduce the discharge of storm water pollutants to the MS4 to the Maximum Extent Practicable (MEP).

A-4.3.1 Other City of Garden Grove Pollution Prevention Codes/Ordinances

In addition to the City's water quality ordinance, other sections of the City's municipal code also address water quality protection and pollution prevention and contribute to a comprehensive water quality/pollution prevention program. These complimentary codes are noted in Table A-4.1.

Table A-4.1:
City of Garden Grove Pollution Prevention Related Codes

Title	Chapter	Name	Section	Content
6: HEALTH & SANITATION	20	Weed and rubbish abatement	6.20.030: Removal Duty	Failure to remove weeds and rubbish from public property which is creating a nuisance is prohibited
	21	Hazardous material incident cost recovery	6.21.020: Nuisance	All hazardous materials when released or unsafely contained in such a fashion are detrimental to the health, safety or welfare of any person or to property, are declared to be a public nuisance
	33	Industrial waste disposal	6.33.040: Dumping of waste unlawful	The city declares that dumping or discharging of industrial waste by any person in a manner which will or may cause or result in the pollution of any underground or surface waters is unlawful.



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SECTION A-4, LEGAL AUTHORITY

	36	Human waste disposal in public	6.36.010: Human waste disposal, urinating or defecating in public view or on public property	<p>No person shall urinate or defecate:</p> <ul style="list-style-type: none">• In any common area on private property other than in a toilet receptacle within the structure of a restroom facility of commercial, industrial or residential structure; or• On any public street, sidewalk, alley, park or other public place except in a toilet receptacle within the structure of a restroom facility.
11: Public Safety	4	Streets and Sidewalk	11.04.340: Finishing and clean up	<p>all debris and excess material from excavation and backfill operations shall be removed from the right-of-way and the roadway left in a neat and orderly condition. All roadside drainage ditches shall be restored to the original grades and the inlet and outlet ends of all culverts shall be left free and clear.</p>



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SECTION A-4, LEGAL AUTHORITY

	8	Building Materials in Streets	11.08.060: Failure to remove	No person shall fail to remove any building material of any kind whatsoever, or any debris deposited or maintained on any street, within five days after the completion of the construction, alteration, repair or demolition of any building in front of which such material or debris is deposited or maintained, nor fail to leave the street in as good a condition as the same was prior to the depositing of such material or debris therein.
	8	Building Materials in Streets	11.08.080: Deposit restrictions	No person shall deposit or maintain any building material of any kind whatsoever, or any debris from any building or excavation, in or upon any street: In any manner as to obstruct the gutter space of the street;



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SECTION A-4, LEGAL AUTHORITY

	8	Building Materials in Streets	11.08.090: Mixing plaster	No person shall mix, make, place or pile any mortar, plaster, or lime, or any similar substance or mixture upon any surface of any paved street, or cause the same to remain at any place in such a manner that the same will fall or leak upon the surface of any street.
	8	Building Materials in Streets	11.08.110: Building material removal	No person shall store or keep upon any street any material or debris taken from any excavation or building, or fail to remove the same from day to day as it is produced or to wet any dry debris or rubbish, so as to prevent the same from being blown by the wind, whether in the course of removal from any building or excavation, or on any street.
	12	Structures in streets	11.12.060: Irrigation water permit	No person shall deposit, place, discharge or conduct any water used or intended to be used for irrigating and land into or upon any street without first having obtained a permit so to do from the development services department.



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SECTION A-4, LEGAL AUTHORITY

	12	Structures in streets	11.12.070: Water in streets	No person shall drain water or other liquid or permit water or other liquid to be drained from land onto any public street by any means which result in damage to the street or causes interference with or hazard to public travel on or maintenance of said public street.
	12	Structures in streets	11.12.080: Washing private alleys	No person shall wash or flush any private alley, way or place so that the water from the washing or flushing thereof shall run or be discharged into or upon any public street or into the gutter of any public street.
	16	Watercourses and drains	11.16.010: Obstructions	No person shall fill or obstruct any natural watercourse or any channel carrying storm water unless a permit to do so has been obtained from the development services department.



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SECTION A-4, LEGAL AUTHORITY

	16	Watercourses and drains	11.16.020: Drainage structures	No person shall construct, reconstruct, alter, repair, install or maintain any drainage structure in any natural watercourse or channel carrying storm water unless a permit to do so has been obtained from the development services department.
	16	Watercourses and drains	11.16.030: Interference	No person shall do anything to any natural watercourse or any channel carrying stormwater that will in any manner obstruct or interfere with the flow of water through such watercourse or channel,
	36	Benches and shelters	11.36.160: Maintenance	Routine maintenance and cleaning, including emptying of trash receptacles and related services, shall be provided the bench or shelter by licensee at least once per week.
14: Water	16	Usage regulated	14.16.070: Waste of water prohibited	The watering of lawns, open ground, crops and trees, in a manner which allows a substantial quantity of excess water to run off the area being watered.



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SECTION A-4, LEGAL AUTHORITY

	40	Water conservation program	14.40.025	(c) No Excessive Water Flow or Runoff (d) No Washing Down Hard or Paved Surfaces (e) Obligation to Fix Leaks, Breaks, or Malfunctions
10: Vehicles and traffic	40	Restricted use of streets	10.40.050: Repairing or greasing vehicles in public streets	No person shall construct, repair, or grease any vehicle or any part thereof upon any public street in the city. Emergency repairs may be made upon a public street.

Water & Sewer Agency Pollution Prevention Ordinances/Programs

In addition to City ordinances, there are sewer agencies that govern residents and businesses. These agencies enforce regulations and implement programs that contribute to the overall effectiveness of the City's water quality/pollution prevention program. The City closely coordinates with these agencies on these programs. These sewer agency programs are listed below in Table A-4.2.

SECTION A-4, LEGAL AUTHORITY

Table A-4.2
Independent Sewer Agency Pollution Prevention Related Ordinances /Programs

<u>Agency</u>	<u>Name of Ordinance/Program</u>	<u>Date Adopted or Effective</u>	<u>Website</u>	<u>Water Quality / Pollution Prevention Issue Addressed</u>
Garden Grove Sanitary District	Sanitary District Code of Regulations	2010	http://www.ci.garden-grove.ca.us/?q=pw/sewers	Sewer spill prevention, trash and debris
Garden Grove Sanitary District	Grease Control Ordinance # 6	10/26/2004	http://www.ci.garden-grove.ca.us/?q=pw/fatfreesewers	Sewer spill prevention
Garden Grove Sanitary District	Sewer System Management Plan	9/30/2005		Maintenance of sewer system, spill response protocol

Roles & Responsibilities Beyond City Jurisdiction

Although the City has a robust regulatory and enforceable framework in place, there are agencies, industries and programs that may have either complimentary and/or conflicting authority that may extend beyond the authority of the City. The City believes that collaboration with the following agencies, industries and programs will be necessary for a comprehensive and effective water quality program. The City is not responsible for discharges regulated under separate NPDES permits or where the City has no authority. The following list includes some agencies and programs that are beyond City authority that may affect receiving water quality:

- Pesticides used in the state are registered by the Department of Pesticide Regulation (DPR).*
- Air contaminants, including fugitive dust, are regulated by the Air Quality Management District (AQMD).
- Leaking Underground Storage Tanks (LUST), Landfills, regulations on water reuse, Restaurant Inspections, Ocean Water Protection - Beach Closures & Warnings Monitoring Program (per AB411), Used Oil Recycling, etc. are overseen by Orange County Health Care Agency.
- Hazardous Waste Inventory and Emergency Planning is regulated by the Orange County Fire Authority as the Administering Agency (AA).

SECTION A-4, LEGAL AUTHORITY

- Hazardous Waste Transport, Treatment, Storage & Disposal are regulated by the Department of Toxic Substances Control (DTSC).
- Caltrans is regulated by State and Regional Board under Order 99-06-DWQ.
- Construction projects impacting one acre or greater are regulated by the General Construction Permit under Order 2009-0009-DWQ, which is administered by the State Resources Control Board.
- Industrial sites are regulated under the Industrial Permit under Order 97-03-DWQ, which is administered by the State Resources Control Board.
- Discharges from utility vaults and underground structures are regulated under Order 2006-0008-DWQ, which is administered by the State Resources Control Board.

*In California, DPR, SWRCB and RWQCB have mandates and authorities bearing on pesticides and water quality. In order to promote cooperation to protect water quality from the adverse effects of pesticides, DPR and the SWRCB signed a Management Agency Agreement (MAA). The MAA, and its companion document, "The California Pesticide Management Plan for Water Quality," strive to coordinate interaction, facilitate communication, promote problem solving, and ultimately assure the protection of water quality. The City looks forward to seeing the outcomes of this MAA coordination and implementation, as pesticides have been noted as a pollutant of concern in water bodies within Orange County.

A-4.4 ENFORCEMENT

The City's Water Quality Ordinance includes adequate legal authority, to the extent permitted by California and Federal Law and subject to the limitations on municipal action under the constitutions of California and the United States, to enter, inspect and gather evidence (pictures, videos, samples, documents, etc.) from industrial, construction and commercial establishments. Sanctions are in place to allow the City to progressively and decisively take enforcement actions against any violators of their Water Quality Ordinance. The City has adopted the Enforcement Consistency Guide For Water Quality Ordinance Implementation (DAMP Exhibit 4.I) and follows the guidelines and procedures included therein.

The detection, elimination and enforcement activities undertaken by the City are described further in DAMP Section 10.0. Authorized Inspector(s) (AI) are assigned to investigate compliance with and detect incidences of violations of the City's Water Quality Ordinance. In addition to prohibiting unpermitted discharges, the Water Quality Ordinance also provides the legal authority for requiring BMPs in new development and significant redevelopment found in DAMP Section 7.0.

The City of Garden Grove has key departments and staff responsible for overseeing, implementing, and enforcing City ordinances. These departments are identified in Table A-4.3.

SECTION A-4, LEGAL AUTHORITY

A-4.5 ASSESSMENT

Upon adoption of the Fourth Term Permit, the City in conjunction with the Principal Permittee and other Permittees, collectively reviewed all applicable ordinances. The City has concluded that the City's ordinances grant the City the adequate legal authority necessary to implement and enforce the requirements of the permit and a Statement of Legal Authority (Exhibit A-4.1) signed by legal counsel, was completed to certify that the City of Garden Grove has the legal authority to implement and enforce the requirements in 40 CFR 122.26(d)(2)(i)(A-F).

Table A-4.3
City of Garden Grove Water Quality Related Functions

Function	City Department / Staff	Description of Department's Functions	Department's Water Quality Related Functions	Ordinance Department Enforces
NPDES Program Management/ Coordination	Public Works: Environmental Compliance	Co-Permittee for County-wide NPDES Program Program Management for Garden Grove Stormwater Program and Garden Grove Sanitary District Fats, Oils and Grease Program	<ul style="list-style-type: none">Administers and enforces the City's Water Quality OrdinancesCoordinates city-wide stormwater program and internal stormwater programProvides training and guidance materials to City employees and managersInspection of food service facilities for compliance with FOG program and follow up on sewer spills	Stormwater Quality Ordinance 6.40 FOG Ordinance 6 GGSD Code of Regulations
Public Works	Public Works: Engineering Community Development: Building Services	Oversight of public and private development and construction activities	<ul style="list-style-type: none">Conducts inspections of projects and activities that require a permit under a Public Works-administered programDesigns and constructs some City projectsReviews proposed designs for some public and private projects	Building Code 18
Public Works	Public Works: Facilities, Streets and Street Trees, Right of way	Maintains public facilities and resources	<ul style="list-style-type: none">Cleans City streetsCleans and maintains the City MS4	
Public Works	Public Works: Engineering	Responsible for construction and WQMPs Reviews grading permit applications for water quality and other requirements necessary to issue permits; enforces Grading Ordinance, Grading Manual, and Grading and Excavation Code	<ul style="list-style-type: none">Assures inclusion of appropriate BMPs into the design, construction and post-construction operation/maintenance of City facilitiesIssues grading permits for development projects and imposes conditions on such permits	
Public Works	Public Works: Vehicle Maintenance	Maintains City vehicle fleet	<ul style="list-style-type: none">Maintains all City vehicles and equipment with engines	
Planning	Community Development: Planning	Reviews plans for environmental impacts; administers CEQA process for the City	<ul style="list-style-type: none">Evaluates the potential environmental impacts of proposed projects for CEQA and other purposes, and provides recommendations to lead agencies, Planning Commission, concerning potential project impacts and means to mitigate those impacts	California Public Resources Code, Division 13, § 21000 et seq. (CEQA)
Planning	Community Development: Building Services	Reviews building permit applications for water quality and other requirements necessary to issue permits; enforces Building Code	<ul style="list-style-type: none">Administers and enforces County Uniform Building CodeIssues building permits for development projects and imposes conditions on such permitsCheck plumbing fixtures installation to prevent cross connections of sewer and storm drain	Uniform Building Code Uniform Plumbing Code
Parks Maintenance	Public Works: Parks and Facilities	Operates and maintains regional recreational facilities and city buildings	<ul style="list-style-type: none">Maintains various City facilities and partsDesigns and constructs certain City facilities	Not Applicable
Public Works Director	Public Works Director		<ul style="list-style-type: none">Coordinates and directs the urban-runoff related efforts of Public Works divisions and departmentsAdvises the Council and City Managers office on the policy and economic aspects of urban runoff related matters	Not Applicable
Public Works City of Garden Grove Local Implementation Plan Legal Authority	Public Works: Sanitation (LIP)	Maintain Garden Grove Sanitary District sewer lines and sewer facilities A-4-12 Respond to sanitary sewer spills	<ul style="list-style-type: none">Clean and repair sewer lines and sewer facilities to prevent blockages and repair structural deficienciesRespond to public and private sanitary sewer spills	GGSD SSMP GGSD Code of Regulations

SECTION A-5, MUNICIPAL ACTIVITIES

A-5.0 MUNICIPAL ACTIVITIES COMPONENT

The municipal activities component of this plan is composed of the following elements:

1. **Section A-5.1**, Program Summary
2. **Section A-5.2**, Model Municipal Activities Program Details
3. **Section A-5.3**, Model Integrated Pest Management, Pesticides and Fertilizer Guidelines
4. **Section A-5.4**, Education and Training

A-5.1 PROGRAM SUMMARY

The City of Garden Grove has incorporated the Model Municipal Activities Program described in **DAMP Section 5** of the Orange County Drainage Area Management Plan (**DAMP**) as the basis for this section of the Local Implementation Plan. Subsequent sections of A-5 describe and outline guidelines, procedures and requirements for the City of Garden Grove.

A-5.1.1 Program Overview

The Local Implementation Plan has been developed to assist municipal staff in complying with Santa Ana Regional Board Order No. R8-2009-0030. The program management model for overseeing, implementing, and enforcing the municipal activities stormwater program element is identified in **Figure A-5.1**.

The below list provides contact information for and describes the role that each of the various city departments that own, operate, or maintain municipal Fixed Facilities, Field Programs, and Drainage Facilities. For each Department, the contact information for the employee who has the primary responsibility and oversight for ensuring that the program has been implemented has been included.

Public Works Department

Drainage and Flood Control

Contact Name: Richard Gosselin

Title: Public Works Supervisor

Telephone: (714) 741-5384

Address: 13802 Newhope Street, Garden Grove, CA 92843

Responsible for the operation and maintenance of drainage and flood control facilities throughout the municipality. Activities conducted within the flood control facilities may include the use of pesticides or herbicides, flushing, sediment removal, vegetation and debris removal and a variety of structural repairs.

SECTION A-5, MUNICIPAL ACTIVITIES

Park Maintenance

Contact Name: Patricia Hayes

Title: Public Works Supervisor

Telephone: (714) 741-5563

Address: 13802 Newhope Street, Garden Grove, Ca 92843

Responsible for the operation and maintenance of landscaping of public parks, including parking lots, buildings and recreational facilities. Responsible for implementation of the Integrated Pest Management (IPM) Policy.

Solid Waste

Contact Name: A.J. Holmon III

Title: Environmental/Streets Manager

Telephone: (714) 741-5956

Address: 13802 Newhope Street, Garden Grove, Ca 92843

Responsible for the municipal landfills and waste management of facilities.

Street Sweeping

Contact Name: Mark Ladney

Title: Administrative Analyst

Telephone: (714) 741-5382

Address: 13802 Newhope Street, Garden Grove, Ca 92843

Responsible for street sweeping on all public streets and parking lots.

Facilities Maintenance

Contact Name: Ron Meislahn

Title: Facilities Manager

Telephone: (714) 741-5380

Address: Address: 13802 Newhope Street, Garden Grove, Ca 92843

Responsible for operation and maintenance of the municipal administrative and operation facilities (i.e. Civic Center, City Operation Center and Yard) and the municipal automotive fleet.

Engineering Division

Contact Name: Bill Murray

Title: City Engineer

Telephone: (714) 741-5184

Address: 11222 Acacia Parkway, Garden Grove Ca, 92840

Responsible for the administration of public improvement projects.

Fleet Management

Contact Name: Phil Carter

SECTION A-5, MUNICIPAL ACTIVITIES

Title: Equipment Maintenance Supervisor

Telephone: (714) 741-5930

Address: 13802 Newhope Street, Garden Grove, Ca 92843

Responsible for the maintenance, repair and cleaning of all municipal vehicles except for harbor vessels.

Wastewater Division

Contact Name: Brent Hayes

Title: Wastewater Supervisor

Telephone: (714) 741-5976

Address: 13802 Newhope Street, Garden Grove, Ca 92843

Responsible for implementing control measures to minimize infiltration of seepage from sanitary sewers to municipal storm drain systems through the operation and maintenance of all municipal wastewater facilities.

Water Division

Contact Name: Dave Entsminger

Title: Water Services Manager

Telephone: (714) 741-5561

Address: 13802 Newhope Street, Garden Grove, Ca 92843

Responsible for the operation and maintenance of all municipal water facilities.

Other Departments:

Fire Department

Contact Name: Dave Barlag

Title: Deputy Chief/Operations Manager

Telephone: (714) 741-5618

Address: 11301 Acacia Pkwy Garden Grove, CA 92840

Operates and maintains fire stations throughout the municipality.

Contact Name: Jeff Guyer

Title: Hazardous Materials Coordinator

Telephone: (714) 741-5636

Address: 11301 Acacia Pkwy Garden Grove, CA 92840

Responds to hazardous material spills

Operates and maintains fire stations throughout the municipality and conducts training exercises and responds to hazardous material spills.

SECTION A-5, MUNICIPAL ACTIVITIES

Housing and Neighborhood Services Department

Contact Name: Susan Emery

Title: Community Development Director

Telephone: (714) 741-5148

Address: 11122 Acacia Parkway, Garden Grove Ca, 92840

Operates and maintains facilities such as shelters and Americanization facilities.

Parks and Recreation Services Department

Contact Name: Kim Huy

Title: Community Services Director

Telephone: (714) 741-5212

Address: 11122 Acacia Parkeay, Garden Grove Ca, 92840

Manages public parks and community facilities such as recreation centers and public pools.

Police Department

Contact Name: Kevin Raney

Title: Police Chief

Telephone: (714) 741-5900

Address: 11301 Acacia Pkwy Garden Grove, CA 92840

Operates and maintains police stations and facilities in the municipality .

A-5.1.2 Program Commitments

The major program commitments and the subsections in which they are described in detail include:

- Maintain/update inventories of Fixed Facilities, Field Programs and Drainage Facilities that exist within the jurisdiction (A-5.2.1).
- Prioritize fixed facilities, for the purposes of determining the frequency of inspections (high – annually, medium – bi-annually, low – once/permit term) (A-5.2.2).
- Maintain all Fixed Facilities, Field Programs and Drainage Facilities in accordance with Model Maintenance Procedures and as determined by inspections (A-5.2.3).
- Enforce the maintenance requirements through internal procedures and external contract language (A-5.2.4).
- Implement an Integrated Pest Management policy (A-5.3).
- Educate and train municipal staff (A-5.4).

A-5.1.3 Regulatory Requirements

SECTION A-5, MUNICIPAL ACTIVITIES

The Model Municipal Activities Program and the Model Integrated Pest Management, Pesticide and Fertilizer Guidelines were developed in order to fulfill the municipal activity commitments and requirements of:

- Section XIV of the Santa Ana Regional Water Quality Control Board Municipal NPDES Stormwater permit, Order No. R8-2009-0030; and

A-5.2 MODEL MUNICIPAL ACTIVITIES PROGRAM DETAILS

A-5.2.1 Municipal Inventories

An inventory of all Fixed Facilities, Field Programs and Drainage Facilities sites has been compiled and is updated prior to the start of the wet season (October 1). These include all sites meeting the definition of a fixed facility, field program, or drainage facility, as described in **DAMP Section 5.2.1**. Based on this inventory and inspection records, Garden Grove annually evaluates the maintenance frequency for cleaning of MS4 facilities/drainage facilities, including catch basins.

The Garden Grove's comprehensive municipal program inventories are included in **Exhibit A-5.I** to this LIP.

A-5.2.2 Prioritization

Fixed facility sites are prioritized into high, medium, or low categories, based on the threat to water quality and the procedures set forth in **DAMP Section 5.2.2**. Drainage facility and field program sites are prioritized high based on the threat to water quality. A list of the prioritized fixed facility, field program, and drainage facility sites for the City of Garden Grove is included in **Exhibit A-5.II**.

A-5.2.3 Model Maintenance Procedures

Staff perform operations at fixed facilities, within field programs, and at drainage facilities according to the baseline procedures and Best Management Practices (BMPs) as described within the model maintenance procedures. Optional enhanced BMPs described within the model maintenance procedures have been implemented at high priority fixed facilities, field programs, and drainage facilities if operational history, inspection findings, or other special situations warrant implementation.

The city implements procedures to ensure that flood management processes and projects do not contribute pollutants to receiving waters to the maximum extent practicable.

SECTION A-5, MUNICIPAL ACTIVITIES

Model maintenance procedures relevant to the City of Garden Grove facilities and field programs are included in **Exhibit A-5.III**. The various types of fixed facilities, field programs and drainage facilities within the city are listed below in **Figure A-5.2**.

Figure A-5.2

Field Procedures

- ☐ Lake Management
- ☒ Landscape Maintenance
- ☒ Roads, Streets & Highways
- ☒ Sidewalk, Plaza & Fountains
- ☒ Solid Waste Handling
- ☒ Water & Sewer Utility Ops.

Fixed Facilities

- ☐ Bay/Harbor Activities
- ☒ Building Maintenance/Repair
- ☒ Equipment Main./Repair
- ☒ Fueling
- ☒ Landscape Maintenance
- ☒ Material Loading/Unloading
- ☒ Material Storage, Handling & Disposal
- ☒ Minor Construction
- ☒ Parking Lot Maintenance
- ☒ Spill Prevention & Control
- ☒ Vehicle & Equipment Cleaning
- ☒ Vehicle & Equipment Storage
- ☒ Waste Handling & Disposal

Drainage Facilities

- ☒ Drainage System

The City of Garden Grove coordinates with the local sewage collection/treatment agency to ensure swift response to and containment of sewage spills. In addition, Garden Grove participates in the Countywide Area Spill Control (CASC) Program described in **DAMP Section 10.0**. Additionally, Garden Grove implements routine maintenance for the city owned/operated sewage collection system in accordance with State Board Water Quality Order No. 2006-0003.

A-5.2.4 Municipal Inspection and Requirements

Inspections of municipal fixed facilities, field programs, and drainage facilities are performed to verify that the maintenance procedures are being implemented, are appropriate for that municipal fixed facility, field program or drainage facilities and are protective of water quality.

Inspections are based upon the priority of the fixed facility or field program, and their threat to water quality as indicated in the site priority list included in **Exhibit A-5.II**. All drainage facilities are considered high priority. Inspection frequency is consistent, whether a facility or program is operated and maintained by municipal staff, contracted staff, or lessors.

SECTION A-5, MUNICIPAL ACTIVITIES

A-5.2.4.1 Inspection Frequencies

The frequency of municipal facility and program inspections is shown in **Table A-5.1** below:

Table A-5.1
Inspection Frequencies

Facility/Program	Inspection Frequency
Fixed Facilities	
Municipal Corporation Yards	Annually
High Priority Fixed Facility	Annually
Medium Priority Fixed Facility	Biannually During First Year of Program Implementation
Low Priority Fixed Facility	Once During First Year of Program Implementation
Field Programs	
High Priority Field Programs	Annually
Drainage Facilities	
Drainage Facilities	Annually (see specific indications below)

Municipal corporation yards are inspected quarterly. For drainage facilities located in the Santa Ana Region, at least 80 percent of drainage facilities are inspected, cleaned, and maintained on an annual basis, with 100 percent of the facilities included in a two-year period. Fixed Facilities and Field Programs will be inspected as indicated above, however in the event of an observed problem, such as ineffective maintenance procedures or detected non-stormwater discharges, the inspection frequency will be increased as appropriate to facilitate correction of the problem.

A-5.2.4.2 Inspection Documentation Procedures

The inspection forms used during inspection consist of the following:

- **General Inspection Forms** – This primary form provides for a general characterization of the fixed facility, field program, or drainage facility being inspected, including the type of facility or program, the reason for inspection, and activities that may take place. A general cover sheet inspection form is required for all inspections.
- **Activity Specific Inspection Forms** – These secondary forms provide a series of questions about specific activities taking place at a fixed facility, field program, or drainage facility, as well as a list of suggested corrective action plans that can be implemented should a problem be found.

SECTION A-5, MUNICIPAL ACTIVITIES

Inspection forms for each fixed facility, field program, and drainage facility in Garden Grove are included in **Exhibit A-5.IV**.

A-5.2.4.3 Enforcement Procedures

To ensure compliance, the **Garden Grove** will implement enforcement procedures as described in **DAMP Section 5.2.4.3**.

A-5.2.4.4 Municipal Retrofitting

The **City of Garden Grove** examines opportunities to retrofit existing MS4 conveyance systems, parks and other recreational areas, where feasible. Countywide analysis of retrofitting opportunities is described in **DAMP Section 5.2.4.4**.

A-5.3 MODEL INTEGRATED PEST MANAGEMENT, PESTICIDES AND FERTILIZER GUIDELINES

The **City of Garden Grove** has adopted an Integrated Pest Management (IPM) policy consistent with **DAMP Section 5.3**. Garden Grove's IPM policy is included in **Exhibit A-5.V**.

The city will also conduct annual IPM self-audits in accordance with the adopted IPM policy.

A-5.4 TRAINING AND EDUCATION

To assist the responsible municipal staff of the **City of Garden Grove** in understanding the Municipal Activities Maintenance Procedures, training sessions are conducted. In addition to Permittee sponsored training, the City provides the means for staff to attend training seminars or workshops related to stormwater management and water quality conducted by other organizations, as needed. Required training for municipal employees is included in **Table A-3.2** of this LIP. Records of both Permittee and Non-Permittee sponsored training provided to City staff are maintained.

Model Municipal Program Training Modules

To support implementation of the Municipal Activities Program element, five municipal activities training modules were developed during the Third Term Permits as described in **DAMP Appendix B, Section B-5**. The five modules include: *Municipal Activities Program Management, Fixed Facilities Maintenance Procedures, Field Program Maintenance Procedures, Program Management – IPM, Pesticide and Fertilizer Guidelines and Integrated Pest Management Approaches*. The modules will be substantially updated in 2010-11 to reflect the requirements of the Fourth Term Permits.

Additional Program Implementation Effort (2010-2011 PEA):

SECTION A-5, MUNICIPAL ACTIVITIES

Require the reporting of acres in which pesticides were applied.

Improve BMP implementation for field staff by testing out different BMPs available, and utilizing those which were most effective and least cumbersome.

The City's Information Technology Department is working to create a GIS based MS4 maintenance tracking program. Additionally, a new hand held device will be used to complete the City's storm drain infrastructure for the GIS map and be used to track illicit connections to the City's storm drain system.

Structural controls and non-structural controls that will be implemented include:

1. Add a berm to the south side of the raw materials storage bins.
2. Repairing broken check valve in the waste asphalt/concrete storage bin
3. Improve control of landscape debris disposed in waste bins
4. Thorough bi-monthly cleaning around high trash areas

Last reporting year (2009-2010) additional staffing was requested to aid in implementation and further development of the City's stormwater program. In June 2011 the Environmental Compliance Division received an intern with will greatly aid in workloads for the inspection component of the program.

Exhibit A-5.I

Municipal Activities Inventory (Inventory & Prioritization Spreadsheet/Maps)

Exhibit A-5-II

Municipal Activities Prioritization

Exhibit A-5-III

Maintenance Procedures (Facility/Procedures Summary Spreadsheets)

Exhibit A-5-IV

Municipal Inspection & Enforcement

Exhibit A-5-V

Integrated Pest Management, Pesticides and Fertilizer Guidelines

SECTION A-6, PUBLIC EDUCATION

A-6.0 PUBLIC EDUCATION

The public education component of this plan is composed of the following elements:

- Model Public Education Program – *Project Pollution Prevention* (**Section A-6.2**), and
- City Education Program (**Section A-6.3**).

A-6.1 PROGRAM SUMMARY

The *City of Garden Grove* has incorporated the Model Public Education Program as the basis for this section of the Local Implementation Plan. Subsequent sections of A-6 describe and outline outreach procedures in accordance with Section XIII of the Santa Ana Regional Water Quality Control Board (RWQCB) Municipal NPDES Stormwater permit, Order No. R8-2009-0030.

A-6.1.1 Program Overview

The *City of Garden Grove's* support and participation in the countywide public education program – *Project Pollution Prevention* is the principal means of ensuring compliance with the public education and outreach elements of the permit(s). In addition to this effort, the City conducts local programs to additionally increase awareness and foster environmental protective behaviors. The below list provides contact information for the primary and secondary city representatives responsible for outreaching to the public concerning stormwater pollution prevention.

Primary

Environmental Compliance Division

Contact Name: A.J. Holmon III

Title: Streets/Environmental Manager

Telephone: (714) 741-5956

Address: 13802 Newhope Street, Garden Grove CA 92843

Secondary

Environmental Compliance Division

Contact Name: Lorian Hornik

Title: Sr. Environmental Services Specialist

Telephone: (714) 741-5564

Address: 13802 Newhope Street, Garden Grove CA 92843

A-6.1.2 Program Commitments

The major program commitments and the subsections in which they are described in detail include:

SECTION A-6, PUBLIC EDUCATION

- Multi-media outreach (A-6.2.1);
- Non-media outreach (A-6.6.2);
- School outreach (A-6.2.3):
- Pollutant-specific educational materials (A-6.2.4);
- Business-specific educational materials (A-6.2.5);
- Mobile businesses outreach (A-6.2.6);
- Residential outreach (A-6.2.7);
- CIA/HOA outreach (A-6.2.8); and
- City education program (A-6.3)

A-6.1.3 Regulatory Requirements

The federal regulations require, as part of the DAMP, a description of educational activities, public information activities, and other appropriate activities to facilitate the proper management and disposal of used oil and toxic materials (Federal Register/Vol. 55, No. 222, p. 48071). In addition, the regulations also specify education programs for construction site operators and a program to facilitate public reporting of illicit discharges.

The Public Education Program was developed as a model for fulfilling the public education requirements of:

- Section XIII of the Santa Ana Regional Water Quality Control Board (RWQCB) Municipal NPDES Stormwater permit, Order No. R8-2009-0030; and
- Section F.3.b.(6) and F.3.c.(6) of the San Diego RWQCB Municipal NPDES Stormwater permit, Order No. R9-2009-0002.

A-6.2 MODEL PUBLIC EDUCATION PROGRAM

The *City of Garden Grove* supports *Project Pollution Prevention*. This dynamic Countywide outreach campaign is built upon a foundation of cooperative Permittee development of programs and materials, implementation at Countywide and city levels, and the validation of its success through the use of opinion surveys and other direct measures of public behavior.

The NPDES Public Education Sub-Committee (Committee) comprised of Co-Permittee representatives meets monthly to collaboratively direct *Project Pollution Prevention*. The *City of Garden Grove* participates in the Committee to ensure materials developed are appropriate to residents and businesses within the city.

The objectives of the Model Public Education Program described in **DAMP Section 6.0** are to provide the following:

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- Increase awareness of all segments of the community of the importance of community involvement in controlling non-point source pollution;
- Provide information on alternative behaviors and practices that can contribute to controlling non-point source pollution and change behavior of target audiences; and
- Track public awareness in the educational programs.

A-6.2.1 Multi-media Outreach Plan

A strategic media relations campaign is developed annually to reach a majority of the selected target groups with sufficient frequency (three or more times) to measurably increase their knowledge and measurably change their behavior. A cost-efficient and strategic media plan for print, gas station pump-top, theater, cable, and radio advertising based on market research, program effectiveness assessment, and results of the 2009 Public Awareness Survey is updated annually (see **DAMP Exhibit 6.III**).

The media plan includes the following criteria:

- Use targeted ad placement. Place print ads in sections or features that have a high probability of being read by the target audience;
- Take advantage of seasonal behaviors and activities. Schedule paid media and non-media activities to coincide with the seasonal nature of certain behaviors and activities associated with stormwater pollution;
- Use geographic targeting. Focus paid media and non-media activity in areas that have particular relevance;
- Take advantage of media spill from neighboring programs. Plan and schedule paid media to take advantage of media reaching Orange County from neighboring programs, particularly Los Angeles and San Diego counties;
- Coordinate paid media and non-media activities to maximize their impact and effectiveness; and
- Identify the expected number of impressions that may be achieved for each event.

In addition to the countywide multi-media campaign, the *City of Garden Grove* targets 100 percent of residents and businesses within the jurisdiction, including commercial and industrial establishments.

A-6.2.2 Non-media Outreach Plan

A cost effective and strategic non-media outreach plan is implemented in conjunction with and in compliment to the multi-media outreach campaign (**DAMP Exhibit 6.III**). Non-media outreach refers to activities that are free or low cost media advertisements. Combined with paid advertising, free or low cost outreach efforts reach selected target audiences with sufficient frequency to increase their awareness and motivate them to change their polluting behaviors.

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Project Pollution Prevention will continue to utilize “quads” comprised of a newsletter article, press release, fact sheet and billing insert on various pollution prevention topics. A speakers bureau will continue to provide presentations on stormwater issues to organizations such as Kiwanis Clubs, Chambers of Commerce, Toastmasters and other associations.

A-6.2.3 School Outreach

Project Pollution Prevention uses agreements and relationships with organizations that outreach to school-aged children to deliver messaging on pollution prevention. These organizations, such as the Orange County Department of Education (OCDE), Discovery Science Center (DSC) and the Ocean Institute, provide various materials and programming focused on identifying pollution causing activities and encouraging pollution preventative behaviors.

A-6.2.4 Pollutant-specific Outreach

Outreach materials are developed and revised annually by *Project Pollution Prevention* to outreach to residents and businesses in Orange County regarding specific pollutants of concern. City-specific materials supplement these efforts ensuring that pollution issues specific to the city are adequately addressed. Pollutant-specific outreach include proper use and disposal of pesticides and fertilizers, proper disposal of pet waste, residential auto washing and proper disposal of household hazardous waste. Pollutant-specific outreach to businesses will focus on water conservation, reduction of metals in runoff and proper use and disposal of chemicals and other hazardous wastes.

A-6.2.5 Business-specific Outreach

In addition to the pollutant-specific outreach materials noted above, the City will continue to utilize materials previously developed for food service establishments (FSEs), automotive service centers and detailing establishments, gasoline service stations and the construction industry. A more detailed description of the FSE Program can be found in **DAMP Section 9.3** and **Section A-9.3** of this LIP.

Previously developed Outreach to the construction industry will be supplemented by materials promoting residential and commercial implementation of LID techniques, retrofitting of existing development and encouragement of infiltration.

A-6.2.6 Mobile Business Program

Project Pollution Prevention will develop materials on BMP implementation for mobile businesses as described in **DAMP Section 9.4** and **Section A-9.4** of this LIP. BMP factsheets already developed are made available to mobile businesses operating within the City.

A-6.2.7 Residential Program

Project Pollution Prevention will develop materials for the Residential Program described in section **DAMP Section 9.5** and **Section A-9.5** of this LIP. The Residential Program includes

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recommendations (“*Tips*”) for pollution-prevention methods for residential areas. Specific pollution prevention practices that are recognized for each residential activity with high potential to pose a threat to water quality, as being effective and economically advantageous, are provided in the activity fact sheets presented in **Exhibit A-9.II**. The *City of Garden Grove* uses the implementation strategies discussed in **Section A-9.5.4** to encourage pollution prevention in residential areas.

In addition, the City will facilitate proper management and disposal of used oil, toxic materials and other household hazardous wastes (HHWs) by providing educational materials describing the operation of the County’s principal Household Hazardous Waste Collection Centers.

A-6.2.8 Common Interest Areas/Homeowner Association Activities Program

The Common Interest Area (CIA) / Homeowner Association Area (HOA) Activities Program includes specifications for pollution-prevention methods for CIA/HOA areas and is described in **DAMP Section 9.6** and **Section A-9.6**.

A-6.3 CITY EDUCATION PROGRAM

The *City of Garden Grove* implements a city-specific public education campaign to complement *Project Pollution Prevention* to address local issues and target constituencies that are best reached through a local rather than a countywide effort.

Public Education Material Distribution

The City makes educational materials available to its residents at public facilities as indicated in **Table 6.1**.

Table A-6.1: Educational Materials at Public Facilities

Public Facility	Materials Available
BROCHURES - Available at Municipal Service	Orange County Watersheds Brochures:
	<ul style="list-style-type: none"> • The Ocean Begins at Your Front Door (English, Spanish, Vietnamese) • Help Prevent Ocean Pollution: • Proper Disposal of Household Hazardous Materials (English, Spanish, Vietnamese) • Pet Care • General Construction and Site Supervision • Landscaping • Concrete and Mortar Application, • Home Remodeling • Automotive Maintenance and Car Care • Maintenance Practices for Your Business
	Integrated Waste Management Department:

Available at City Hall:		<ul style="list-style-type: none"> • Safe, Easy, and Free Disposal of Household Hazardous Waste. • Household Battery Recycling
		POSTERS (Available at Municipal Service Center) BMP Poster for Food/Restaurant Industry BMP Poster for Auto Repair Industry BMP Poster for Gas Station Operation Construction Runoff Guidance Manual Help Reduce Urban Runoff / 12 Steps to Stop Being a Sewer Blocker Flier Orange County Watersheds Brochures:
		<ul style="list-style-type: none"> • The Ocean Begins at Your Front Door (English, Spanish, Vietnamese) • Help Prevent Ocean Pollution: • Proper Disposal of Household Hazardous Materials (English, Spanish, Vietnamese) • Pet Care • General Construction and Site Supervision • Landscaping • Concrete and Mortar Application, • Home Remodeling • Automotive Maintenance and Car Care • Maintenance Practices for Your Business
		Integrated Waste Management Department:
		<ul style="list-style-type: none"> • Safe, Easy, and Free Disposal of Household Hazardous Waste. • Household Battery Recycling
		Sewer Spill Prevention for Households & Food Service

Employee Training and Outreach

In addition to the overall comprehensive training effort, the City conducts broad educational outreach on water quality issues to all its employees.

The following approaches have been identified:

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- Conducting meetings with new employees to inform them of water quality issues and the City's responsibilities;
- Including informational inserts with employees' paychecks;
- Placing information on the City's internal web site and/or in the City's employee newsletter;
- Routing relevant newspaper and magazine articles to specific departments or personnel; and
- Hold meetings with departments to help fine-tune public outreach based on their experiences and observations. For example, a certain department representative might say that the residents or businesses it works with have a good understanding of one concept, but need more information about another. Based on this information, the City can produce or obtain educational materials that address these issues.

A-6.3.1 Workshops

The *City of Garden Grove* annually promotes County administered regional workshops for the following public sectors:

- Manufacturing Facilities
- Mobile Service Industry
- Commercial, Distribution and Retail Sales Industry
- Residential/Commercial Landscape Construction and Services Industry
- Residential and Commercial Construction Industry
- Residential and Community Activities

The goals for and implementation of these workshops is further described in **DAMP Section 6.3.1.**

A-6.3.2 Outreach Events

The *City of Garden Grove* participates in at least one community, regional or countywide event per year. Materials developed by *Project Pollution Prevention* encourage the public to report illegal discharges/dumping and include the hotline reporting number. Brochures and other materials also reference the countywide website www.ocwatersheds.com; contained therein are brochures, factsheets and other outreach materials covering a wide range of topics from household use of fertilizers and pesticides to pet care to automotive maintenance activities.

A-6.3.3 Industrial/Commercial and Construction Outreach

Outreach to Industrial Site Owners and Operators

The City distributes educational materials during inspections to educate industrial facility owners and operators about BMPs. These efforts target employees, property management and

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focus on specific industrial activities. The Industrial/Commercial Program is further described in **DAMP Section 9.2** and **Section A-9.2**.

The following approaches have been identified:

- Mailing or delivering brochures with information about regulations, requirements and industry-specific BMPs to industrial site owners/operators;
- Distributing BMP information and educating owners and operators during inspections or other interactions with City staff (**DAMP Section 9.2.3** and **Section A-9.2.3** of this LIP);
- Providing information when industrial companies apply for and/or renew business licenses or permits; and
- Conducting seminars or workshops for targeted industries that have a high potential for pollution. The workshops would cover BMPs for pollution prevention and how their actions can help protect water quality. The City may partner with neighboring cities in a common watershed to maximize attendance and understanding of industries' responsibilities in the watershed.

Outreach to Commercial Site Owners and Operators

During commercial facility inspections, target audiences for BMP materials include employees, property management, franchise chain owners and merchant associations. The Industrial/Commercial Program is further described in **DAMP Section 9.2** and **Section A-9.2** of this LIP.

The following approaches have been identified:

- Providing information about BMPs and regulations when commercial owners apply for or renew business licenses or permits;
- Mailing or delivering brochures on regulations, requirements and business-specific BMPs;
- Distributing BMP information and educating owners and operators during inspections or other interactions with City staff (**DAMP Section 9.2.3** and **Section A-9.2.3** of this LIP); and
- Conducting seminars or workshops for targeted commercial sites that have a high potential for pollution. The workshops would cover BMPs for pollution prevention and how their actions can help protect water quality. The City may partner with neighboring cities in a common watershed to maximize attendance and understanding of businesses' responsibilities in the watershed.

Outreach to Construction Site Contractors/Developers

The *City of Garden Grove* distributes BMP and pollution prevention information, including erosion and sediment control, runoff control and pollutants of concern during construction site

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inspections. The Construction Program is further described in **DAMP Section 8.2** and **Section A-8.2** of this LIP.

The following approaches have been identified and implemented:

- Distributing BMP materials to developers, contractors, residential owners and construction companies when City permits are issued;
- Distributing BMP materials at construction sites within the City;
- Maintaining a supply of information materials at City offices and facilities for interested parties to obtain during business hours throughout the year.;
- Requiring that companies submitting construction bids for City Requests For Proposals (RFPs) include language agreeing to follow BMPs and
- Binders available to contractors containing relevant and recent BMPs.

6.3.4 Outreach to Quasi-Governmental Agencies/Districts

The City works to reach agencies such as water districts, school districts, transportation agencies, utility districts, fire and police departments and service providers (i.e. waste haulers).

The following approaches have been identified and implemented:

- Providing regulatory and BMP information based on the industry (i.e., information about oil spills and cleanup methods for transportation agencies);
- Forming partnerships with agencies to help distribute information through means such as billing inserts;
- Assisting school districts with education programs that meet the Phase I and Phase II public education requirements.

6.3.5 Residential, General Public and School Outreach

Outreach to Residential Community and General Public

Educating the residential community and general public within the *City of Garden Grove* is key to a successful outreach plan. The City has opportunities to supplement the Countywide Program through its daily interactions with its citizenry and in accordance with the its Residential Program described above in **Section A-6.2.7**, in **DAMP Section 9.5** and **Section A-9.5** of this LIP.

The following approaches have been identified and conducted:

- Publishing information about urban runoff and stormwater pollution issues on the City's website and providing links to other related websites such as the County website, www.ocwatersheds.com;

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- Maintaining a supply of brochures and promotional materials at public buildings including City Hall, libraries and community centers;
- Running information on the City's community access channel;
- Participating in community events by hosting a booth with information and promotional materials;
- Participating in and promoting clean-up events such as the annual Cleanup Day;
- Presenting information to community or social groups, as requested;
- Storm drain stenciling reminding residents that materials entering the storm drain wind up in the ocean;
- Working with other jurisdictions, including the Principal Permittee and other Permittees, on joint outreach programs;
- Publicizing the countywide 24-hour water pollution reporting hotline number 1-877-89SPILL, which handles water pollution complaints as well as inquiries about stormwater and public education materials;

Outreach to School Children

Education activities targeting school children informs the next generation of adults at an early age and can be a conduit for providing information to parents.

The following approaches have been identified and conducted for school children:

- Offering child-friendly brochures, coloring books, posters or promotional materials to schools and school districts within the City;
- Offering to provide speakers or educational materials for assemblies;
- Sponsoring assemblies directly relating to urban runoff and stormwater pollution;
- Participating in the Countywide Program to develop a comprehensive school program in conjunction with the Principal Permittee and other Permittees, water agencies and school districts.
- Working with Orange County Coastkeepers WHALES (Watershed Heroes, Actions Linking Environmental Stewardship) program.

and

- Working with non-profit groups to provide an Enviroscape© at outreach events

Additional Program Implementation Effort:

City agencies such as our Community Development Department (CDD), Public Works Department (PW) Water Services Division and Environmental Services Division shall coordinate its Public Education Program efforts to insure information distributed supports each individual agency's Public Education efforts. An example of this would be to insure positive coordination between Green Building rules and regulations (CDD), Water Conservation rules and regulations and Low Impact Design (PW) permit requirements.

A-7.1 Introduction

One of the most important responsibilities of the City of Garden Grove is to provide a decision-making and approval processing framework for new development and reconstruction that occurs within the City's boundaries. This ensures that both development and reconstruction occur in an organized and orderly fashion that reflects the vision and needs of the community, assesses the environmental issues associated with the proposed changes and provides a regulatory framework to ensure that standards set by the City are implemented.

In May 1997 the City of Garden Grove certified to the Santa Ana Regional Board that it was implementing the new development and reconstruction water quality requirements developed with the Principal Permittee and other Permittees as Appendix G of the 1993 DAMP. Since that time all development and reconstruction in the City has occurred in conformance with Appendix G resulting in BMPs being implemented for water quality improvement in many projects.

The Third Term Permits require the City and other Permittees to initiate a comprehensive assessment of their planning and development processes with the intent of providing a greater focus on the protection of water bodies and a more rigorous application of BMPs in development and redevelopment projects. The City has supported the Principal Permittee in developing a model program to guide compliance with these requirements (see **DAMP, Section 7**).

The model program links new development BMP design, construction and operation to the earlier phases of new development project planning encompassed by the General Plan, environmental review process and development permit approval processes. The General Plan specifies policies that guide new development. The environmental review process examines impacts from proposed new development with respect to the General Plan policies and many environmental issues, including water quality, and includes consideration of mitigation measures to reduce any identified significant impacts.

The development permit approval process carries forward mitigation requirements in the form of conditions of approval, design specifications, tracking, inspection and enforcement actions. These three "front-end" planning processes must be coordinated and linked to the later phases of BMP design, construction and operation for new development/significant reconstruction to help ensure storm water quality protection features are planned, designed and evaluated in accordance with goals for the protection of water quality and other environmental resources.

The City has used this model program in developing the new development/reconstruction plan contained in this section of the LIP. Subsequent sections describe:

- The organization structure for new development/reconstruction in the City

SECTION A-7, NEW DEVELOPMENT/SIGNIFICANT REDEVELOPMENT

- The assessment of the City's General Plan and the need for amendment
- The assessment of the City's CEQA environmental review process
- The assessment of the City's development project review, approval and permitting process
- The City's requirement for Water Quality Management Plan (WQMP) preparation
- The City's program for post construction BMP inspection and verification
- Education and training programs
- Program assessment

A-7.2 Organization Structure

The key staff responsible for overseeing, implementing, and enforcing the new development/redevelopment program are identified in **Figure A-7-1** (Attachment 1).

Community Development

Address: 11222 Acacia Parkway
Garden Grove, CA 92840

General Plan Contact – Manager, Susan Emery , Community Development

CEQA Review Contact – Manager, Susan Emery, Community Development

Inspection Contact – Acting Building Official, Rodrigo Victoria, Building Services

Other City Projects – Manager, Susan Emery, Community Development and Rodrigo Victoria, Building Services

The Community Development Department is responsible for:

- Implementing the policies and objectives of the City set forth in the General Plan and Zoning Ordinance
- Reviewing proposed developments for consistency with standards and policies relating to land use, and preservation of the environment
- Overseeing that all building construction complies with adopted codes, and that permitting and licensing systems are efficient and serve the needs of the public, as well as the City.

Public Works Department

Address: 11222 Acacia Parkway and 13802 Newhope Street Garden Grove, CA 92843

Public Works Projects Contact – Managers, Bill Murray (Engineering), A. J. Holmon III (Environmental/Streets), Ron Meislahn (Parks and Facilities)

City Buildings Projects – Manager, Ron Meislahn (Parks and Facilities)

Other City Projects – Manager, Bill Murray (Engineering), A. J. Holmon III (Environmental/Streets), Ron Meislahn (Parks and Facilities)

The Public Works Department is responsible for:

- Administration of public improvement projects and ensuring construction in the public right-of-way complies with adopted codes and engineering standards.
- Administration of building improvement projects and ensuring construction complies with adopted codes and engineering standards.

A-7.3 General Plan Assessment and Amendment

The City of Garden Grove is required by the Santa Ana Region Permit to minimize short and long-term impacts on receiving water quality from new development and significant redevelopment to the maximum extent practicable. The permit requires at a minimum that the City's general plan be reviewed and updated, as necessary, to ensure watershed and storm water quality and quantity management are considered as specified in Section XII of Santa Ana Region Permit.

The Santa Ana Region Permit requires:

"Permittees shall review their watershed protection principles and policies in their General Plan or related documents (such as Development Standards, Zoning Codes, Conditions of Approval, Development Project Guidance) to ensure that these principals and policies are properly considered and are incorporated into these documents."

To meet the Permit requirement, the City has undertaken the following actions consistent with the guidance provided in the **DAMP, Section 7.4:**

1. Review of City's General Plan

The City of Garden Grove has reviewed its General Plan Elements that cover land development issues, for which it may be appropriate to reflect watershed protection and storm water quality management policies. This included review of goals and policies in the following General Plan Elements:

- Land Use;
- Safety;
- Circulation and Infrastructure (i.e., transportation);
- Public Facilities;
- Open Space; and
- Conservation.

The City reviewed development goals and policies, landscaping policies and requirements, open space goals and policies, including preservation or integration with natural features, water conservation policies, and public facilities operation and maintenance policies of these Elements. During the review, special attention was given to how the Elements address water quality protection from urban and storm water runoff. The City kept in mind the following questions during this review, which could trigger the

need for specific storm water/urban runoff protection policies in the General Plan either as new policies and objectives or amended text to existing policies and objectives:

- a) Are there sensitive water resources in the jurisdiction?
- b) Are there existing Total Maximum Daily Loads (TMDLs) or other such regulations pertaining to receiving waters in the jurisdiction?
- c) Is major new development or significant redevelopment expected?
- d) Are major new infrastructure projects anticipated (e.g. roads, sewer, flood control, storm drains)?
- e) Does stormwater/urban runoff affect recreational use of water bodies within the jurisdiction?

The City has also reviewed and considered the following additional objectives to the General Plan and Elements, as specified by the Santa Ana Region Permit, Section XII.3:

- a) Limit disturbance of natural water bodies and drainage systems; conserve natural areas; protect slopes and channels; and minimize impacts from storm water and urban runoff on the biological integrity of natural drainage systems and water bodies.
- b) Minimize changes in hydrology and pollutant loading; require incorporation of control, including structural and non-structural BMPs, to mitigate the projected increases in pollutant loads and flows; ensure that post-development runoff rates and velocities from a site have no significant adverse impact on downstream erosion and stream habitat; minimize the quantity of storm water directed to impermeable surfaces and the MS4s; and maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground;
- c) Preserve wetlands, riparian corridors, and buffer zones and establish reasonable limits on the clearing of vegetation from the project site;
- d) Encourage the use of water quality wetlands, biofiltration swales, watershed-scale retrofits, etc., where such measures are likely to be effective and technically and economically feasible;
- e) Provide for appropriate permanent measures to reduce storm water pollutant loads in storm water from the development site; and,
- f) Establish development guidelines for areas particularly susceptible to erosion and sediment loss.

2. Assessment of Need to Amend City's General Plan

Upon completing the review of its General Plan Elements, the City has determined that certain sections should be modified to include specific policies and objectives that address water quality protection as specified in the Third Term Permits and as described above. The need for and the extent of revisions to the General Plan was coordinated with the City Attorney and Planning Department .

3. Schedule for Amending the City's General Plan

The City will initiate a process to seek authorization from its City Council to amend its General Plan to incorporate watershed and storm water management principles. As part of the General Plan amendment process, maps will be revised, as necessary, to reflect location-specific watershed protection/stormwater quality management policies, and to eliminate conflicts among land use districts, permitted land uses, and stormwater-specific goals and policies.

The process the City will proceed with the General Plan Amendment as follows:

- a) Prepare draft text for General Plan Element(s) policy amendment(s) and related CEQA documentation.
- b) Publish notice for Planning Commission hearing to consider General Plan Amendment.
- c) Request Planning Commission approval through the public hearing process on proposed General Plan Amendment.
- d) Incorporate any changes or additional studies, if required, as a result of the Planning Commission hearing.
- e) Publish notice on City Council hearings on General Plan Amendment.
- f) Request City Council approval through the public hearing process on proposed General Plan Amendment.

A-7.4 CEQA Environmental Review Process

The City is required by the Santa Ana Region Permit to minimize short and long-term impacts on receiving water quality from new development and redevelopment to the maximum extent practicable.

The Santa Ana Region Permit (Section XII.A.3) requires the City to review its CEQA document preparation process to ensure urban runoff-related issues are properly considered and addressed. If necessary, the City's processes may be revised to consider and mitigate impacts to storm water quality. The Santa Ana Region Permit lists the following potential impacts to be considered by the City during the CEQA review:

- a) Potential impact of project construction on storm water runoff;
- b) Potential impact of project's post-construction activity on storm water runoff;
- c) Potential for discharge of storm water pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas, loading docks or other outdoor work areas;
- d) Potential for discharge of storm water to affect the beneficial uses of the receiving waters;
- e) Potential for significant changes in the flow velocity or volume of storm water runoff to cause environmental harm; and
- f) Potential for significant increases in erosion of the project site or surrounding areas.

These environmental review issues from the Permit have been considered in an evaluation of the City's:

- CEQA Initial Study process (project application forms and checklists) and
- EIR preparation and review process. The results of this evaluation are presented in the sub-sections below.

A-7.4.2. Initial Study Checklist

The current Initial Study Checklist contained in Appendix G of the CEQA Guidelines (State of California Office of Planning and Research, February 2001) was recently updated and is used by the City in its environmental review process. This Checklist contains the following considerations under the environmental impact category "Hydrology and Water Quality (Section VIII) with respect to whether the project would:

- a) Violate any water quality standards or waste discharge requirements?
- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted.
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site
- e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?
- f) Otherwise substantially degrade water quality?
- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- j) Inundation by seiche, tsunami, or mudflow?

The City has concluded that stormwater/urban runoff/water quality considerations are generally covered in questions a) through f) of the CEQA Guidelines Appendix G checklist, but in some cases with less specificity than the questions provided in the Santa Ana Region.

To support awareness of the Third Term Permit considerations described earlier, the City will take the following additional actions:

SECTION A-7, NEW DEVELOPMENT/SIGNIFICANT REDEVELOPMENT

- Provide the Permit list to all environmental planning staff for use in preparing and reviewing CEQA documents for internal City projects and when reviewing CEQA documents prepared by the private sector.
- Distribute the list to consultants and other members of the private sector for use in preparing CEQA documents for private and public sector projects.
- Provide the Third Term Permit considerations to all environmental consultants on the city-approved list of contractors, and be provided to project applicants during the CEQA preliminary review process.
- Support the preparation of training programs by the Principal Permittee for the City, other Permittees and private sector to cover this topic. Training materials containing these considerations and associated guidance on their use will be included by the City during various phases of the environmental review process.

A-7.4.3 Guidance for Preparing and Reviewing CEQA Initial Studies and Environmental Impact Reports (EIRs)

The guidance provided in the **DAMP, Section 7, Exhibit 7.I** will be used by the City in evaluating the CEQA Initial Study checklist questions in Section VIII. Hydrology and Water Quality (Appendix G of the CEQA Guidelines, State of California Office of Planning and Research, February 2001) including the additional questions to be considered by the Santa Ana Region Permit. This guidance is also applicable to the review and preparation of CEQA documents including Negative Declarations, Mitigated Negative Declarations and EIRs.

The guidance will be reviewed annually in conjunction with the Principal Permittee and other Permittees, updated as needed, and its status/use will be discussed in the Annual Progress Report.

A-7.5 Development Project Review, Approval and Permitting

A-7.5.1 Project Review, Approval, and Permitting Process Overview

During project review, approval, and permitting, the City shall require new development and significant redevelopment projects to address the quality and quantity of stormwater runoff through the incorporation of permanent (post-construction) BMPs in project design. The City shall require project-specific Water Quality Management Plans (Project WQMPs) for all private and public projects that:

- Qualify as one of the Priority Project Categories listed in **Figure A-7.2**, regardless of project size.
- Do not qualify as one of the Priority Project Categories but meet one of the following criteria:
 - Require discretionary action that will include a precise plan of development.
 - Require issuance of a non-residential plumbing permit.

New development and significant redevelopment projects requiring a WQMP will be categorized by the City as either a Priority Project or a Non-Priority Project. The primary difference between a Priority Project and a Non-Priority Project is that Priority Projects will be required to include treatment control BMPs in project design. The detailed requirements for preparation of a WQMP are included in **Section A-7.6** and a template for preparing a WQMP is provided as **Exhibit A-7.IV**.

“Significant Redevelopment” means development that would create or add at least 5,000 square feet of impervious surfaces on an already developed site. Significant redevelopment includes, but is not limited to:

- Expansion of a building footprint
- Addition to or replacement of a structure
- Replacement of an impervious surface that is not part of a routine maintenance activity
- Land disturbing activities related with structural or impervious surfaces.

Replacement of impervious surfaces includes any activity that is not part of a routine maintenance activity where impervious material(s) are removed, exposing underlying soil during construction. Significant redevelopment does not include trenching and resurfacing associated with utility work; resurfacing and reconfiguring surface parking lots; new sidewalk construction,

pedestrian ramps, or bike lane on public and private existing roads; and replacement of damaged pavement.

Significant Redevelopment projects may fall into one of several categories:

- Following redevelopment, the entire development (including the redeveloped area) would meet one of the Project Priority categories listed in **Figure A-7.2**. The project would be considered a Priority Project and require a Project WQMP including Treatment Control BMPs. Where the significant redevelopment results in an increase of less than fifty percent of the impervious surface of a previously existing development, and the existing development was not subject to WQMP requirements, the treatment requirements apply only to the addition, and not to the entire development.
- Following redevelopment, the entire development (including the redeveloped area) would not meet one of the Project Priority categories listed in **Figure A-7.2**, but would require discretionary action that will include a precise plan of development, or require issuance of a non-residential plumbing permit. The project would be considered a Non-Priority Project and require a Project WQMP but would not require Treatment Control BMPs.
- The redevelopment activity would not result in a Priority Project and would not require discretionary action that will include a precise plan of development or issuance of a non-residential plumbing permit. The project would not require a Project WQMP.

The City shall require project applicants to submit a Project WQMP at one or both points in the project planning and permitting stage:

- During the discretionary approval process (land use permit) of a proposed project, when the City must exercise judgment or deliberation in order to approve or disapprove a new development or significant redevelopment project, or
- During the ministerial approval process of issuing a grading, building, demolition, or similar “construction” permits in which only fixed standards or objective measures are applied.

A-7.5.2 Public Agency Projects

The City has incorporated the requirement for a Project WQMP into the process of planning, design, approval, and construction oversight of its public agency projects. Depending upon the type of public agency project being planned or designed, the City’s Engineering or Public Works Department or the design architect/engineering contractor will prepare the Project WQMP for a public facility project.

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The City will not require a WQMP for public agency projects consisting of routine maintenance or emergency construction activities required to protect public health and safety; interior remodeling with no outside exposure of construction materials or construction waste to storm water; mechanical permit work; electrical permit work; and sign permit work.

The types of public agency projects for which the City will require a Project WQMP include, but are not limited to:

- Parks and recreation facilities
- Public Buildings
- Streets and roadways
- Above ground drainage facilities (e.g. channels, basins)

The categories of Priority Projects are listed in **Figure A-7.2**. Although the City does not plan and design some of these categories of projects per se, some public agency projects may have similar functions or characteristics or may conduct similar activities after construction is completed. Therefore, some of the City's public agency projects will be considered Priority Projects requiring Treatment Control BMPs. For example, a new corporation yard may include a vehicle and equipment maintenance facility, which is very similar to an automotive repair shop. A new civic center or library may be considered a Priority Project since it is very similar in its characteristics to a commercial office building. A new senior citizens center or a jail may have a cafeteria, which is very similar to a restaurant, and, therefore may be categorized as a Priority Project.

A-7.5.3 Conditions of Approval

The City has reviewed its standard conditions of approval to ensure that the existing standard conditions are not in conflict with any provisions of the Santa Ana Region Permit the DAMP, California's General Permit for Stormwater Discharges Associated with Construction Activity, California's General Permit for Stormwater Discharges Associated with Industrial Activity, and where conflicts were identified, the City has revised the existing standard conditions of approval.

The City shall utilize the following standard conditions of approval to protect receiving water quality from the short-term and long-term impacts of new development and redevelopment:

General Conditions

The following conditions will be applied by the City to the project identified in A-7.5.1:

- Prior to the issuance of any grading or building permits for projects that will result in soil disturbance of one or more acres of land¹, the applicant shall demonstrate that coverage has been obtained under California's General Permit for Stormwater Discharges Associated with Construction Activity by providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board and a copy of the subsequent notification of the issuance of a Waste Discharge Identification (WDID) Number. Projects subject to this requirement shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). A copy of the current SWPPP shall be kept at the project site and be available for City review on request.
- Prior to the issuance of any grading or building permits or prior to recordation upon subdivision of land if determined applicable by City Building Official, the applicant shall submit to the City for review and approval a Water Quality Management Plan that:
 - Addresses Site Design BMPs such as minimizing impervious areas, maximizing permeability, minimizing directly connected impervious areas, creating reduced or "zero discharge" areas, and conserving natural areas
 - Incorporates the applicable Routine Source Control BMPs as defined in the DAMP
 - Incorporates Treatment Control BMPs as defined in the DAMP
 - Generally describes the long-term operation and maintenance requirements for the Treatment Control BMPs,
 - Identifies the entity that will be responsible for long-term operation and maintenance of the Treatment Control BMPs, and
 - Describes the mechanism for funding the long-term operation and maintenance of the Treatment Control BMPs.
- Prior to grading or building permit close-out and/or the issuance of a certificate of use or a certificate of occupancy, the applicant shall:
 - Demonstrate that all structural best management practices (BMPs) described in the Project WQMP have been constructed and installed in conformance with approved plans and specifications,
 - Demonstrate that applicant is prepared to implement all non-structural BMPs described in the Project WQMP,
 - Demonstrate that an adequate number of copies of the approved Project WQMP are available onsite,Submit for review and approval by the City an Operations and Maintenance (O&M) Plan for all structural BMPs.

¹ After March 10, 2003 the phrase "soil disturbance of five or more acres of land" must be replaced with the phrase "soil disturbance of one acre or more of land."

Industrial Facilities

The following conditions may be applied by the City on a project specific basis:

- For industrial facilities subject to California's General Permit for Stormwater Discharges Associated with Industrial Activity as defined by Standard Industrial Classification (SIC) code, prior to grading or building permit close-out and/or the issuance of a certificate of use or a certificate of occupancy, the applicant shall demonstrate that coverage under the permit has been obtained providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board and a copy of the notification of the issuance of a Waste Discharge Identification (WDID) Number.

Special Conditions

The following conditions may be applied by the City on a project specific basis:

- Prior to the issuance of any building permits, the applicant shall include in the plans any urban runoff control measures deemed necessary by the Building Official.
- Prior to issuance of certificates of use and occupancy or building permits for individual tenant improvements or construction permits for a tank or pipeline, uses shall be identified and, for specified uses, the applicant shall propose plans and measures for chemical management (including, but not limited to, storage, emergency response, employee training, spill contingencies and disposal). The chemical management measures shall be incorporated as an element of a Water Quality Management Plan and shall be subject to the approval of the City Building Official and other specified agencies such as the Fire Authority/Fire Department, the Orange County Health Care Agency and sewerage agencies to ensure implementation of each agency's respective requirements. Certificates or permits may be ministerially withheld if features needed to properly manage chemicals cannot be incorporated into a previously completed building, center or complex.

A-7.5.4 Review and Approval of WQMPs

The requirements for preparation of a WQMP are described in **Section A-7.6**. The City shall require all new development and significant redevelopment projects that meet the minimum requirements described in **Sections A-7.5.1 and A-7.5.2** to select appropriate permanent (post-construction) non-structural and structural BMPs, prepare a Project WQMP, and submit the Project WQMP for review and approval. Prior to issuance of grading or building permits, the City shall require the project applicant to have an approved final Project WQMP. The City will require public projects that are considered Priority Projects to complete a Project WQMP as part

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of the design review, and Non-Priority Projects to identify and include all applicable routine structural Source Control BMPs and consider Site Design BMPs in the project.

The City shall utilize a checklist to document the identification of a project as a Priority Project or as a Non-Priority Project. The checklist to be used by the City for categorizing new development and significant redevelopment projects as Priority or Non-Priority is shown in **Figure A-7.2**.

Figure A-7.2. Checklist for Categorizing Development and Significant Redevelopment¹ Projects as Priority or Non-Priority

Project File No.	
Project Name:	
Project Location:	
Project Description	

Proposed Project Includes:	Yes	No
1. Residential development of 10 units or more		
2. Commercial and industrial development greater than 100,000 square feet including parking areas		
3. Automotive repair shop (SIC codes 5013, 5014, 5541, 7532-7534, and 7536-7539)		
4. Restaurant where the land area of development is 5,000 square feet or more including parking areas (SIC code 5812)		
5. Hillside development on 10,000 square feet or more, which is located on areas with known erosive soil conditions or where natural slope in 25 percent or more		
6. Impervious surface of 2,500 square feet or more located within, directly adjacent to (within 200 feet), or discharging directly to receiving water within Environmentally Sensitive Areas ² .		
7. Parking lot area of 5,000 square feet or more, or with 15 or more parking spaces, and potentially exposed to urban runoff		

¹ "Significant Redevelopment" means development that would create or add at least 5,000 square feet of impervious surfaces on an already developed site. Significant redevelopment includes, but is not limited to: the expansion of a building footprint; addition to or replacement of a structure; replacement of an impervious surface that is not part of a routine maintenance activity; and land disturbing activities related with structural or impervious surfaces. Replacement of impervious surfaces includes any activity that is not part of a routine maintenance activity where impervious material(s) are removed, exposing underlying soil during construction. Significant redevelopment does not include trenching and resurfacing associated with utility work; resurfacing and reconfiguring surface parking lots; new sidewalk construction, pedestrian ramps, or bike lane on public and private existing roads; and replacement of damaged pavement.

² Environmentally Sensitive Areas are shown in **Exhibit A-7.VI**

Priority Project: Any question answered "YES."

Non-Priority Project: All questions are answered "NO."

DETERMINATION: This project is considered a PRIORITY / NON-PRIORITY project.

(Circle appropriate answer.)

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Although both Priority and Non-Priority projects require the preparation of a WQMP, the scope of the WQMP differs. The WQMP for a Priority Project must address:

- Site Design BMPs,
- Routine structural and non-structural Source Control BMPs,
- Treatment Control BMPs, including consideration of a regional or watershed approach, and
- The mechanism(s) by which long-term operation and maintenance of all structural BMPs will be provided.

The WQMP for a Non-Priority Project must address:

- Routine structural and non-structural Source Control BMPs,
- Consideration of Site Design BMPs, and
- The mechanism(s) by which long-term operation and maintenance of all structural BMPs will be provided.

To assure thorough and consistent reviews of Project WQMPs, the City will utilize the WQMP Checklist provided in **Exhibit A-7.III** and approve in writing appropriately completed Project WQMPs.

A-7.5.5 Plan Check: Issuance of Grading or Building Permits

The construction plans submitted by the applicant for plan check must incorporate all of the structural BMPs identified in an approved Project WQMP. Therefore, the City will encourage/require applicants to obtain approval of the final Project WQMP prior to submitting construction plans for plan check.

General or Special Notes for Plan Sheets

Prior to the issuance of a grading or building permit, the City shall require the permit applicant to include the following as general or special notes on the plan sheets for new development or significant redevelopment projects:

- Sediment from areas disturbed by construction shall be retained on site using structural controls to the maximum extent practicable.
- Stockpiles of soil shall be properly contained to minimize sediment transport from the site to streets, drainage facilities or adjacent properties via runoff, vehicle tracking, or wind.

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- Appropriate BMPs for construction-related materials, wastes, spills or residues shall be implemented to minimize transport from the site to streets, drainage facilities, or adjoining property by wind or runoff.
- Runoff from equipment and vehicle washing shall be contained at construction sites unless treated to remove sediment and other pollutants.
- All construction contractor and subcontractor personnel are to be made aware of the required best management practices and good housekeeping measures for the project site and any associated construction staging areas.
- At the end of each day of construction activity all construction debris and waste materials shall be collected and properly disposed in trash or recycle bins.
- Construction sites shall be maintained in such a condition that an anticipated storm does not carry wastes or pollutants off the site. Discharges of material other than stormwater are allowed only when necessary for performance and completion of construction practices and where they do not: cause or contribute to a violation of any water quality standard; cause or threaten to cause pollution, contamination or nuisance; or contain a hazardous substance in a quantity reportable under Federal Regulations 40 CFR Parts 117 and 302.

Potential pollutants include but are not limited to: solid or liquid chemical spills; wastes from paints, stains, sealants, glues, lime, pesticides, herbicides, wood preservatives and solvents, asbestos fibers, paint flakes or stucco fragments; fuels, oils, lubricants, and hydraulic, radiator or battery fluids; concrete, detergent or floatable wastes; wastes from any engine/equipment steam cleaning or chemical degreasing; and superchlorinated potable water line flushings.

During construction, disposal of such materials should occur in a specified and controlled temporary area on-site physically separated from potential stormwater runoff, with ultimate disposal in accordance with local, state and federal requirements.

- Dewatering of contaminated groundwater, or discharging contaminated soils via surface erosion is prohibited. Dewatering of non-contaminated groundwater requires a National Pollutant Discharge Elimination System (NPDES) permit from the respective State Regional Water Quality Control Board.

Plan Check for Private Projects with Land Use Permits

For projects with land use permits, the City shall review the environmental (CEQA) documentation (including the Mitigation Monitoring and Reporting Program), the conditions of

approval and the approved Project WQMP for an understanding of the water quality issues and structural BMPs required. The City shall review construction plans for conformity with the approved Project WQMP. If the selected BMPs were approved in concept during the land use entitlement process, the City shall require the applicant to submit detailed construction plans showing locations and design details of all BMPs that are in substantial conformance with the preliminary approvals. The City shall review a project's construction plans to assure that the plans are consistent with the BMP design criteria and guidance provided in **DAMP Section 7, Exhibit 7.II.**

Plan Check for Projects with By-Right Zoning (Ministerial Projects)

For projects with by-right zoning or projects that do not need discretionary review, the City shall first review the proposed Project WQMP for conformity with the requirements described in **DAMP Section 7.7** and **DAMP Section 7, Exhibit 7.II.** The approved Project WQMP shall then be used in reviewing the construction plans for consistency with the BMP design criteria and guidance provided in **DAMP Section 7, Exhibit 7.II.**

Plan Check for Public Agency Projects

Prior to initiating grading or construction activities, the City shall ensure that the construction plans for its public works projects reflect the structural BMPs described in the approved Project WQMP. In conducting the design review process for its public agency projects, the City shall review the construction plans and specifications for conformity with the approved Project WQMP and for consistency with the BMP design criteria and guidance provided in **DAMP Section 7, Exhibit 7.II.**

Plan Check for Projects with Alternative Treatment Control BMPs (*See DAMP Section 7, Exhibit 7.II Section 3.3.3.*)

If an applicant elected to utilize Alternative Treatment Control BMPs in a project's construction plans, the City shall require the project's engineer of record to certify that the Alternative Treatment Control BMPs are equally or more effective in pollutant reduction than comparable BMPs found in the Model WQMP.

A-7.5.6 Permit Closeout, Certificates of Use, and Certificates of Occupancy

The Project WQMP continues with the property after the completion of the construction phase and the City may require that the terms, conditions and requirements be recorded with the County Recorder's office by the property owner or any successive owner as authorized by the Water Quality Ordinance. The end of the construction phase therefore represents a transition from the New Development/Significant Redevelopment Program to the Existing Development Program. Accompanying this is a close out of permits and issuance of certificates of use and

occupancy. The City will use this juncture to assure satisfactory completion of all requirements in the Project WQMP by requiring the applicant to:

- Demonstrate that all structural BMPs described in the Project WQMP have been constructed and installed in conformance with approved plans and specifications,
- Prepare and submit for review and approval an O&M Plan for all structural BMPs,
- Demonstrate that a mechanism or agreement acceptable to the City has been executed for the long-term funding and performance of BMP operation, maintenance, repair, and/or replacement.
- Demonstrate that the applicant is prepared to implement all non-structural BMPs described in the Project WQMP,
- Demonstrate that an adequate number of copies of the Project WQMP are available onsite, and
- For industrial facilities subject to California's General Permit for Stormwater Discharges Associated with Industrial Activity as defined by Standard Industrial Classification (SIC) code, demonstrate that coverage has been obtained by providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board and a copy of the notification of the issuance of a Waste Discharge Identification (WDID) Number.

The O&M Plan for structural BMPs that is prepared by the applicant for private sector projects shall describe and/or include:

- Structural BMPs
- Employee responsibilities and training for BMP operation and maintenance
- Operating schedule
- Maintenance frequency and schedule
- Specific maintenance activities
- Required permits from resource agencies, if any
- Forms to be used in documenting maintenance activities
- Notification to Orange County Vector Control District of the structural BMPs in place
- Recordkeeping requirements (at least 5 years)

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At a minimum, the City shall require the annual inspection and maintenance of all structural BMPs.

Following satisfactory inspection, those structural BMPs agreed during the planning process to be within City right-of-ways, or on land to be dedicated to City ownership will be accepted. Upon acceptance, responsibility for operation and maintenance will transfer from the developer or contractor to the appropriate City department, including the funding mechanism identified in the approved Project WQMP.

If a property owner or a private entity, such as a homeowners association (HOA), retains or assumes responsibility for operation and maintenance of structural BMPs, the City shall require access for inspection through an agreement. If the City will be responsible for operating and maintaining structural BMPs on private property, an easement will be established to allow for entry and proper management of the BMPs. Such access easements shall be binding throughout the life of the project, or until the BMPs requiring access are acceptably replaced with a BMP not requiring access. Funding for the long-term operation and maintenance of structural BMPs will be front-funded, or otherwise guaranteed via mechanisms such as approved assessment districts, or other funding mechanisms.

Public Agency Projects

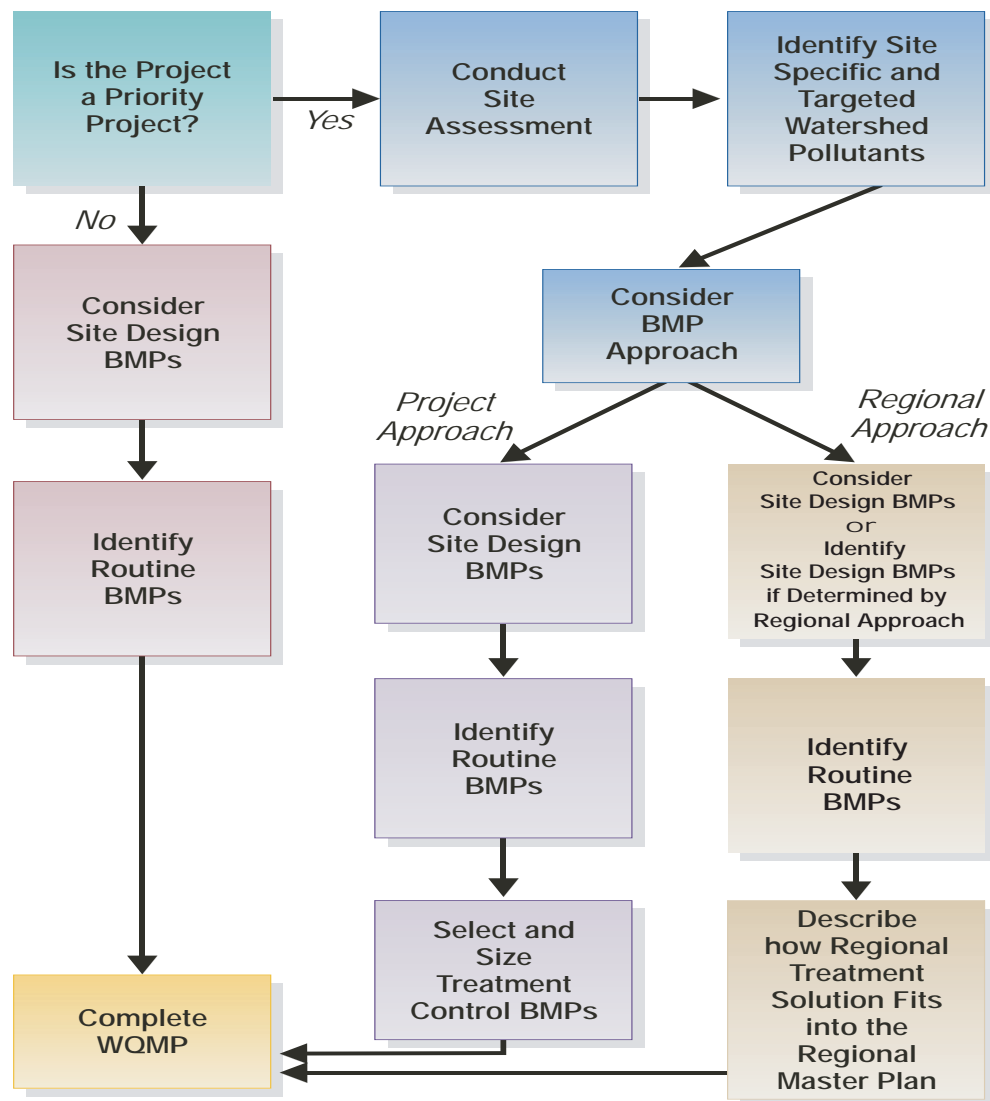
For the City's public facility projects, upon completion of construction when contract close-out occurs the responsibility for operation and maintenance of the structural BMPs will transfer from the contractor to the appropriate City department. The City has the authority to approve the transfer of structural BMPs to any other public entity within its jurisdiction and shall negotiate satisfactory operation and maintenance standards with the public agencies accepting the operation and maintenance responsibilities. Alternatively, the responsibility for the operation and maintenance of structural BMPs may be transferred to a private entity through contracts or lease agreements. In any such transfer agreement, the City shall be identified as a third-party beneficiary empowered to enforce maintenance agreements.

A-7.6 Water Quality Management Plan (WQMP) Preparation

In accordance with the requirements in the Development Project Review, Approval and Permitting process stated previously, the City will require Project WQMPs to be prepared using the guidelines set forth in the Model WQMP, provided in **DAMP Section 7, Exhibit 7.II.**, and the submittal template provided as **Exhibit A-7.IV.** Elements of WQMP development are illustrated in the following figure:

Figure A-7.2

Development Planning and WQMP Preparation Steps



BMP Implementation

Consistent with the Model WQMP, the City of Garden Grove will require Priority Projects to:

- Implement all Source Control BMPs (routine non-structural and routine structural) unless not applicable to the project;
- Consider the implementation of Site Design BMPs and document those BMPs included and those not included; and
- Either:
 - Implement Treatment Control BMPs including a selection of such BMPs into the project design, (unless a waiver is granted for infeasibility of all Treatment Control BMPs, see Model WQMP, **DAMP Section 7, Exhibit 7.II, Section 6.0** for details);

or:

- Participate in or contribute to an acceptable regional or watershed management program.

The City of Garden Grove will require all other (Non-Priority) projects to implement Source Control BMPs and consider implementing Site Design BMPs. Once a project reaches the plan check phase, the applicant will be required to submit the approved Project WQMP together with construction plans that incorporate the selected BMPs. Projects that have not been subject to the land use entitlement process or other discretionary review will still need to prepare and obtain approval of a Project WQMP, and include it with the plan check review submittal.

A combination of Source Control BMPs (routine non-structural and routine structural BMPs) and Site Design BMPs is generally the most effective means of pollution prevention and because they minimize the need for treatment. The City of Garden Grove will require Treatment Control BMPs to be considered for all Priority Projects in addition to Source Controls to meet requirements of the Third Term Permits to minimize, to the maximum extent practicable, the discharge of pollutants to the storm drain system or receiving waters.

The categories of stormwater pollution control BMPs are summarized in **Table A-7.1**, together with applicable projects and primary pollution prevention objectives of the BMPs.

Routine Source Control BMPs

Routine structural Source Control BMPs are low-technology practices designed to prevent pollutants from contacting stormwater runoff or to prevent discharge of contaminated runoff to

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the storm drainage system. Routine non-structural Source Control BMPs are listed in **Table A-7.2**. Routine structural Source Control BMPs are listed in **Table A-7.3**.

Table A-7.1
Summary of BMPs for Development/Redevelopment Projects

BMP Category		Applicable Projects	Pollution Prevention Objective
Source Control BMPs	Routine Non-Structural BMPs	Required for all projects – as applicable	Prevent pollution by educating the public on proper disposal of hazardous or toxic wastes, regulatory approaches, street sweeping and facility maintenance, and detection and elimination of illicit connections and illegal dumping
	Routine Structural BMPs	Required for all projects – as applicable.	Prevent potential pollutants from contacting rainwater or stormwater runoff or to prevent discharge of contaminated runoff to the storm drain system or receiving waters. Reduce the creation or severity of potential pollutant sources or to reduce the alteration of the project site's natural flow regime
Site Design BMPs		All projects should consider implementation of Site Design BMPs	Minimize or prevent potential pollutants from contacting rainwater or stormwater runoff or to prevent discharge of contaminated runoff to the storm drain system or receiving waters.
Treatment Control BMPs or Regional Program		All priority projects – at least one treatment control BMP required	Remove pollutants from stormwater runoff prior to discharge to the storm drain system or receiving waters

Table A-7.2
List of Routine Non-Structural BMPs

Identifier	Name
N1	Education for Property Owners, Tenants and Occupants
N2	Activity Restrictions
N3	Common Area Landscape Management
N4	BMP Maintenance
N5	Title 22 CCR Compliance (How the development will comply)
N6	Local Industrial Permit Compliance
N7	Spill Contingency Plan
N8	Underground Storage Tank Compliance
N9	Hazardous Materials Disclosure Compliance
N10	Uniform Fire Code Implementation
N11	Common Area Litter Control
N12	Employee Training
N13	Housekeeping of Loading Docks
N14	Common Area Catch Basin Inspection
N15	Street Sweeping Private Streets and Parking Lots
N16	Commercial Vehicle Washing
N17	Retail Gasoline Outlets

Table A-7.3
List of Routine Structural BMPs

Provide storm drain system stenciling and signage
Design and construct outdoor material storage areas to reduce pollution introduction
Design and construct trash and waste storage areas to reduce pollution introduction
Use efficient irrigation systems & landscape design, water conservation, smart controllers, and source control
Protect slopes and channels and provide energy dissipation

Table A-7.3
List of Routine Structural BMPs

Incorporate requirements applicable to individual project features:

- | | |
|----|---|
| a. | Dock areas |
| b. | Maintenance bays |
| c. | Vehicle wash areas |
| d. | Outdoor processing areas |
| e. | Equipment wash areas |
| f. | Fueling areas |
| g. | Hillside landscaping |
| h. | Wash water control for food preparation areas |
| i. | Community car wash racks |

Site Design BMPs

The principal objective of Site Design BMPs is to prevent pollution of stormwater by minimizing the introduction of pollutants and conditions of concern that may result in significant impacts generated from site runoff to the storm water conveyance system. One approach to achieve this objective is to reduce stormwater runoff flows and volumes and reduce pollutants through appropriate Site Design BMPs.

Start at the Source (Bay Area Stormwater Management Association 1999) provides design guidance and techniques for implementing site design BMPs. Benefits derived from this approach include:

- Reduced size of downstream treatment controls and conveyance systems;
- Reduced pollutant loading to treatment controls; and
- Reduced hydraulic impact on receiving streams

Site Design BMPs should be considered for all projects. Site Design BMPs include the design techniques listed in **Table A-7.4**.

Table A-7.4
Site Design BMP Techniques

Minimize Impervious Area/Maximize Permeability (C-Factor Reduction)
Minimize Directly Connected Impervious Areas (DCIAs) (C-Factor Reduction)
Create Reduced or "Zero Discharge" Areas (Runoff Volume Reduction)
Conserve Natural Areas (C-Factor Reduction)

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Fact sheets for routine structural Source Control BMPs and Site Design BMPs are presented in **Exhibit A-7.V**. The fact sheets include design criteria established to ensure effective implementation of the required Site Design BMPs and will be made available by the City.

Treatment Control BMPs

Treatment Control BMPs are engineered technologies designed to remove pollutants from stormwater runoff and are required to augment Source Control and Site Design BMPs to reduce pollution from stormwater discharges to the maximum extent practicable. The type of Treatment Control BMP(s) to be implemented at a site depends on a number of factors including: type of pollutants in the stormwater runoff, volume or flow of stormwater runoff to be treated, project site conditions, receiving water conditions, and General Industrial Permit requirements, when applicable. Land requirements, and costs to design, construct and maintain Treatment Control BMPs vary by Treatment Control BMP.

Unlike flood control measures that are designed to handle peak flows, stormwater Treatment Control BMPs are designed to treat the more frequent, lower-flow storm events, or the first flush portions of runoff from larger storm events (typically referred to as the first-flush events). Small, frequent storm events represent most of the total average annual rainfall for the area. The flow and volume from such small events is targeted for treatment.

The primary control strategy for designing BMPs is to treat the Stormwater Quality Design Flow (SQDF) or the Stormwater Quality Design Volume (SQDV) of the stormwater runoff. **Table A-7-5** lists BMPs along with the basis of design, SQDF or SQDV, to be used for designing the BMP. The Model WQMP (**DAMP Section 7, Exhibit 7-II**) shows the approach that should be used to calculate the SQDF and/or SQDV.

Table A-7-5
Basis of Design for Treatment Control BMPs

Treatment Control BMP	Design Basis
Vegetated (Grass) Strips	SQDF
Vegetated (Grass) Swales	
Proprietary Control Measures	
Dry Detention Basin	SQDV
Wet Detention Basin	
Constructed Wetland	
Detention Basin/Sand Filter	

Porous Pavement Detention	
Porous Landscape Detention	
Infiltration Basin	
Infiltration Trench	
Media Filter	
Proprietary Control Measures	

Fact sheets are presented in **Exhibit A-7.V**. The fact sheets include design criteria established to ensure effective implementation of the required Treatment Control BMPs.

Regional or Watershed Programs

If the path of a regional or watershed-based program is selected, the regional or watershed BMPs selected must be designed to provide equivalent treatment objectives for the entire area. More detailed analysis (such as detailed planning and modeling) should be employed and cross-jurisdictional issues must be clearly defined and coordinated (see **DAMP Section 7** for a more detailed discussion of the applicability of regional or watershed programs).

A-7.7 Post Construction BMP Inspection and Verification

The City will conduct verifications to assure that implementation and appropriate maintenance described in the WQMP are taking place at structural and non-structural BMPs during the post construction phase. Assessment of BMP effectiveness will take place during verification. The goal is to perform verifications at 90% of developments with approved Project WQMPs during the Third Term Permit period. The number of verifications necessary to achieve the above goal will be based on either the total area of approved Project WQMP projects, or the total number of Project WQMPs approved.

Verification of BMP implementation and ongoing maintenance will be conducted by inspection, self-certifications, surveys, or other equally effective approaches. A summary of the inspections conducted and any assessments of effectiveness will be provided in the annual progress report.

A-7.8 Education and Training

To assist responsible municipal staff and contract staff in understanding the DAMP's Model New Development/Redevelopment Program, annual training sessions will be conducted. In addition to Permittee sponsored training, staff may also attend training seminars or workshops related to

general water quality and stormwater management during construction, conducted by other organizations.

A-7.8.1 Training Modules

Two training modules have been prepared that cover different aspects of the Model New Development/Significant Redevelopment Program. These modules are provided in **DAMP Appendix B-7**.

New Development/Significant Redevelopment Program Management (DAMP Appendix B, Exhibit B-7.I)

This training module is for Permittee Stormwater Program managers and the managers of a Permittee's planning and building departments. It provides an overview of the Stormwater Program as it pertains to a Permittee's General Plan, the preparation and review of environmental documents (Initial Studies, EIRs, EISs, Negative Declarations, Mitigated Negative Declarations, etc.), conditions of approval for projects, the review of Project WQMPs, plan check, and permit closeout. The training module also briefly describes a Permittee's responsibility for verifying and inspecting permanent BMPs and for assessing the effectiveness of the New Development/Significant Redevelopment Program element.

Project Planning and Design: Environmental Review, Planning and Permitting, and WQMP Development (DAMP Appendix B, Exhibit B.7.II)

This training module is targeted to planners, plan checkers, developers and engineers, and will address: the laws and regulations applicable to new development/significant redevelopment; the connection between new development/significant redevelopment and water quality; how to review and prepare CEQA compliance documents with regard to stormwater/urban runoff effects, how to develop and review a Project WQMP; and how to design and incorporate into a project Source Control, Site Design and Treatment Control BMPs to minimize impact to receiving waters.

A-7.8.2 Record Keeping

Records of training provided to City staff will be maintained to allow a determination of:

- Which staff require which training
- When training sessions were conducted
- Compliance with the permit requirements

In addition to the Permittee-sponsored training, City staff may also attend various other workshop or training events as they take place throughout the year. These types of events may include local or national organization sponsored training.

A-7.9 Program Effectiveness Assessment

The City will submit an annual progress report each year to the Principal Permittee (**see DAMP Appendix C, Section C-7**). This report will provide the basis for evaluating the City's efforts towards the reduction of pollutants from new development and significant redevelopment. The annual progress report will demonstrate a commitment to pollution prevention and source reduction processes in new development/redevelopment projects in the City. Future annual progress reports will include:

- Changes made to the City's General Plan, CEQA and development review processes
- Information on WQMPs approved and verified by the City;
- Documentation of training received by the City staff.

Additional Program Implementation Elements (2009-2010 PEA):

- Increase training to construction inspectors and project managers to ensure WQMP BMPs are implemented per plan.
- While performing development and construction plan check, ensuring the grading plan is consistent with the WQMP.
- Create a functional WQMP database to facilitate tracking businesses with WQMP's as well as proper WQMP BMP implementation.
- Ensure business/property owners are aware of the importance of WQMP implementation for the life of the development.

A-8.0 CONSTRUCTION COMPONENT

The construction component of this plan is composed of the following elements:

1. **Section A-8.1**, Program Summary
2. **Section A-8.2**, Model Construction Program
3. **Section A-8.3**, Education and Training

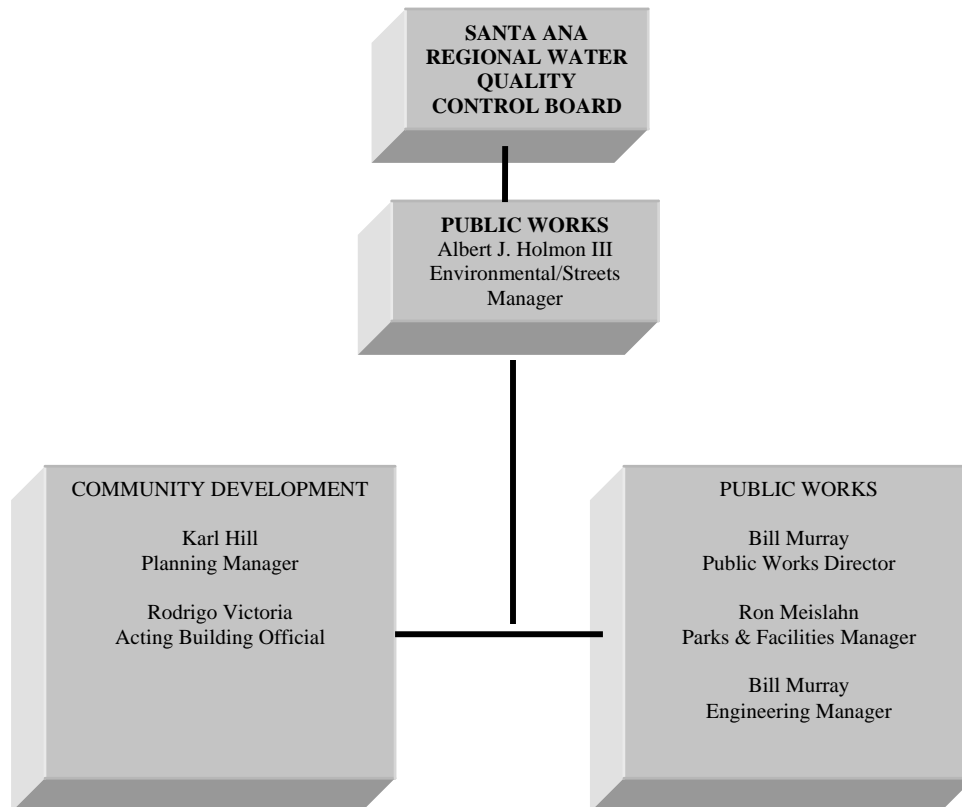
A-8.1 PROGRAM SUMMARY

A-8.1.1 Program Overview

Construction and grading activities are a potential source of pollutants in all phases of execution. The following sections present a detailed set of guidelines to prevent or minimize the impacts of urban runoff generated by construction activities within the City of Garden Grove on receiving water bodies.

The City of Garden Grove has key staff responsible for overseeing, implementing, and enforcing the program. These staff members are identified in **Figure A-8.1** below.

Figure A-8.1



SECTION A-8, CONSTRUCTION

The following section outlines and describes City departments that are involved in issuing building and/or grading permits for private development projects and are responsible for inspecting these projects during construction, or that manage public works construction projects that have a potential to impact water quality.

Public Works Department
Bill Murray
City Engineer/Director
(714) 741-5375
13802 Newhope Street
Garden Grove, CA 92843

The Public Works Department develops, builds and maintains the City's infrastructure, including streetscapes, open space, parks, athletic fields, bike trails; roadways, traffic signals and many miles of interconnected drainage system.

Community Development Department
Susan Emery
Director
(714) 741-5121
11222 Acacia Parkway
Garden Grove, CA 92840

Planning Division
Karl Hill
Planning Director
(714) 741-5323
11222 Acacia Parkway
Garden Grove, CA 92840

The Community Development Department is responsible for implementing the policies and objectives of the community as set forth in the municipality's General Plan and Zoning Ordinance. This Department also reviews proposed developments for consistency with the City's standards and policies relating to land use, and preservation of the environment, to ensure that the quality of life will be maintained or enhanced for future generations.

Public Works Department
Engineering Division
Bill Murray
Manager, City Engineer
(714) 741-5192
11222 Acacia Parkway
Garden Grove, CA 92840

SECTION A-8, CONSTRUCTION

The Engineering Division is responsible for the administration of public improvement projects (typically result in construction activity). The Engineering Division ensures all construction in the public right-of-way complies with adopted codes and engineering standards.

Building Department
Rodrigo Victoria
Acting Building Official
(714) 741-5343
11222 Acacia Parkway
Garden Grove, CA 92840

The Building Department ensures that all building construction in the City complies with adopted codes, and that permitting and licensing systems are efficient and serve the needs of the public, as well as the City.

Public Works Department
Water Services / Sanitation Division
David Entsminger
Manager
(714) 741 - 5375
13802 Newhope Street
Garden Grove, CA 92843

The Wastewater Division is responsible for construction, operation and maintenance of all municipal wastewater facilities. The Water Division is responsible for construction, operation and maintenance of all municipal water facilities.

A-8.1.2 Program Commitments

The major program commitments and the subsections in which they are described in detail include:

- Maintain/update inventories of construction projects (A-8.2.2);
- Prioritize fixed facilities, construction projects (A-8.2.3);
- BMPs for construction projects (A-8.2.4);
- Documentation requirements (A-8.2.5);
- Inspection and enforcement (A-8.2.6); and
- Education and training (A-8.3).

A-8.1.3 Regulatory Requirements

SECTION A-8, CONSTRUCTION

The Model Construction Program was developed in to fulfill the municipal activity commitments and requirements of:

- Section XV of the Santa Ana Regional Water Quality Control Board Municipal NPDES Stormwater permit, Order No. R8-2009-0030;

A-8.2 MODEL CONSTRUCTION PROGRAM

A-8.2.1 Model Program Overview

The City has incorporated the model construction program described in **DAMP Section 8.2** as the basis for this section of its Local Implementation Plan (LIP). This construction program presents requirements and guidelines for pollution prevention methods that must be used by construction site owners, developers, contractors, and other responsible parties, in order to prevent illicit discharges into the MS4, implement and maintain structural and non-structural BMPs to reduce pollutants in storm water runoff from construction sites to the MS4, reduce construction site discharges of storm water pollutants from the MS4 to the maximum extent practicable (MEP), and prevent construction site discharges from the MS4 from causing or contributing to a violation of water quality standards.

A-8.2.2 Inventory of Construction Sites

An inventory of all construction sites has been developed. This includes all sites meeting the definition of a construction project provided in **DAMP Section 8.1.5**, including those covered by the State General Permit¹, a local grading permit or a local building permit, and public works construction projects, and where activities at the site include: soil movement; uncovered storage of materials or wastes, such as dirt, sand or fertilizer; or exterior mixing of cementaceous products, such as concrete, mortar or stucco.

The City of Garden Grove's comprehensive construction site inventory is included in **Exhibit A-8.I**. The inventory will at a minimum be updated biannually; once in September and the second update in May. During the update process, projects for which building or grading permit(s) have expired or have been closed, and projects that have been completed, will be removed from the inventory. New projects will also be added to the inventory as they are initiated. A GIS map showing the location of the construction projects inventoried and their proximity to environmentally sensitive areas has also been included in **Exhibit A-8.I**.

A-8.2.3 Prioritization of Construction Sites

After the inventory is compiled, construction projects are prioritized into high, medium, or low categories, based on the threat to water quality and the procedures set forth in **DAMP Section 8.2.3**. Priorities will at a minimum be updated twice a year in conjunction with the biannual update of the inventory.

¹ State Water Resources Control Board (SWRCB) Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000002, Waste Discharge Requirements (WDRs) for Discharges of Storm Water Runoff Associated with Construction Activity

SECTION A-8, CONSTRUCTION

A-8.2.4 BMPs for Construction Projects

All construction projects, regardless of size or priority, are required to implement BMPs to prevent discharges into the storm drain system or watercourses. **DAMP Section 8.2.4.1** specifies minimum requirements for all projects and specific site management requirements for high and medium priority projects.

All private and public works construction projects are required, at a minimum, to implement and be protected by an effective combination of erosion and sediment controls and waste and materials management BMPs. The minimum requirements are summarized in Table 8-6 of the DAMP (also shown below). These minimum requirements are conveyed to construction contractors as part of the permit conditions and plan notes.

**Table A-8.1
Minimum Requirements for All Construction Sites**

CATEGORY	MINIMUM REQUIREMENTS
Erosion and Sediment Control	Sediments from areas disturbed by construction shall be retained on site using an effective combination of erosion and sediment controls to the maximum extent practicable, and stockpiles of soil shall be properly contained to minimize sediment transport from the site to streets, drainage facilities or adjacent properties via runoff, vehicle tracking, or wind.
Waste and Materials Management Control	Construction-related materials, wastes, spills or residues shall be retained on site to minimize transport from the site to streets, drainage facilities, or adjoining property by wind or runoff.

Construction BMPs

The City of Garden Grove has designated construction-specific BMPs as set forth in **DAMP Section 8.2.4.3. Table A-8.2**, below describes the BMPs designated for use with this LIP. Copies of the corresponding BMP fact sheets are included as **Exhibit A-8.II**.

Table A-8.2
Designated Construction BMPs

CATEGORY	BMP #	BMP NAME
Erosion Control BMPs	EC-1	Scheduling
	EC-2	Preservation of Existing Vegetation
	EC-3	Hydraulic Mulch
	EC-4	Hydroseeding
	EC-5	Soil Binders
	EC-6	Straw Mulch
	EC-7	Geotextiles and Mats
	EC-8	Wood Mulching
	EC-9	Earth Dikes and Drainage Swales
	EC-10	Velocity Dissipation Devices
	EC-11	Slope Drains
	EC-12	Streambank Stabilization
	EC-13	<i>Reserved</i>
	EC-14	Compost Blanket
	EC-15	Soil Preparation/Roughening
	EC-16	Non-Vegetative Stabilization
Sediment Control BMPs	SE-1	Silt Fence
	SE-2	Sediment Basin
	SE-3	Sediment Trap
	SE-4	Check Dam
	SE-5	Fiber Rolls
	SE-6	Gravel Bag Berm
	SE-7	Street Sweeping and Vacuuming
	SE-8	Sandbag Barrier
	SE-9	Straw Bale Barrier
	SE-10	Storm Drain Inlet Protection
	SE-11	Active Treatment Systems
	SE-12	Temporary Silt Dike
	SE-13	Compost Socks and Berms
	SE-14	Biofilter Bags
Wind Erosion	WE-1	Wind Erosion Control

Table A-8.2
Designated Construction BMPs

CATEGORY	BMP #	BMP NAME
Control BMPs		
Tracking Control BMPs	TC-1	Stabilized Construction Entrance/ Exit
	TC-2	Stabilized Construction Roadway
	TC-3	Entrance/Outlet Tire Wash
Non-Stormwater Control BMPs	NS-1	Water Conservation Practices
	NS-2	Dewatering Operations
	NS-3	Paving and Grinding Operations
	NS-4	Temporary Stream Crossing
	NS-5	Clear Water Diversion
	NS-6	Illicit Connection/Illegal Discharge Detection and Reporting
	NS-7	Potable Water/Irrigation
	NS-8	Vehicle and Equipment Cleaning
	NS-9	Vehicle and Equipment Fueling
	NS-10	Vehicle and Equipment Maintenance
	NS-11	Pile Driving Operations
	NS-12	Concrete Curing
	NS-13	Concrete Finishing
	NS-14	Material and Equipment Use Over Water
	NS-15	Structure Demolition/Removal Over or Adjacent to Water
	NS-16	Temporary Batch Plants
Waste Management & Materials Pollution Control BMPs	WM-1	Material Delivery and Storage
	WM-2	Material Use
	WM-3	Stockpile Management
	WM-4	Spill Prevention and Control
	WM-5	Solid Waste Management
	WM-6	Hazardous Waste Management
	WM-7	Contaminated Soil Management
	WM-8	Concrete Waste Management
	WM-9	Sanitary/ Septic Waste Management
	WM-10	Liquid Waste Management

A-8.2.5 Documentation Requirements

The City of Garden Grove has adopted the documentation requirements provided in **DAMP Section 8.2.5**. These requirements apply equally to private development and public works projects.

SECTION A-8, CONSTRUCTION

Requirements for General Permit Sites

Construction sites that are subject to the General Permit are required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) meeting the requirements of the General Permit. A Model SWPPP Template has been created by CASQA and is available on their website as a guide for the information that should be included in a SWPPP.

Private Construction Projects Covered by the General Permit

The following bullets describe the process that is followed by a private construction project:

- The project owner, developer or contractor is responsible for preparing the Notice of Intent (NOI), which must be signed by the owner or person delegated authority and submitted to the State Water Resources Control Board (SWRCB) via the Stormwater Multi-Application, Reporting, and Tracking System (SMARTS). Before issuing a grading or building permit, the City will require proof of General Permit coverage (See conditions of approval **Section A-7.x.x**).
- Once the project owner, developer or contractor receives a grading or building permit (if applicable), the SWPPP must be prepared by Qualified SWPPP Developer (QSD), and signed by the responsible party and must be implemented year-round throughout the duration of the project's construction. County or District staff are not responsible for reviewing, approving or enforcing the SWPPP; these are responsibilities of the Regional Board. Inspector(s) may choose to use the SWPPP as a tool for on-site inspections.
- The City will inspect and enforce local permit(s) and ordinances, and will notify the Regional Board of non-compliance when the non-compliance meets the criteria of posing a threat to human or environmental health as discussed in **DAMP Section 8.4.6**.
- Within 90 days of when construction is complete or ownership has been transferred, the discharger shall electronically file a Notice of Termination (NOT), a final site map, and photos through the SWRCB SMARTS system. Filing a NOT certifies that all General Permit requirements have been met.

Public Agency Construction Projects Covered by the General Permit

The following bullets describe the process that is followed by a public works construction project:

- The City of Garden Grove will prepare all Permit Registration Documents (PRDs) and submit it to the SWRCB through the SMARTS system.
- The SWPPP will be prepared by a QSD, before the contractor is allowed to start construction activities. It is important to note that city staff is not responsible for enforcing the SWPPP, these are responsibilities of the Regional Water Quality Control Board; but inspectors are required to become familiar with the SWPPP as it is part of the contract documents.

SECTION A-8, CONSTRUCTION

- During construction, the City of Garden Grove will inspect and enforce the contract documents and will notify the appropriate Regional Board when non-compliance meets the criteria of posing a threat to human or environmental health as discussed in Section 8.2.6.7 of the DAMP.
- Once the project is completed, the City of Garden Grove will submit an NOT to the SWRCB.

Requirements for Other Sites

Private Construction Projects Not Covered by the General Permit

Private construction projects not covered by the General Permit, but covered under a grading permit, are required to develop Erosion and Sediment Control Plans (ESCPs). These ESCPs must show proposed locations of the erosion and sediment control BMPs that will be implemented during the construction project to comply with the minimum requirements listed in **Table A-8.1**.

Public Works Construction Projects Not Covered by the General Permit

Public agency construction projects not covered by the General Permit are required by **DAMP Section 8.2.5.2** to comply with appropriate pollution prevention control practices in accordance with the current edition of the "Green Book" Standard Specifications for Public Works Construction and the provisions of Section A-8, and shall develop and implement ESCPs. Low priority construction sites shall meet the minimum requirements listed in **Table 8-7** of **DAMP Section 8.2.4.1**.

A-8.2.6 Municipal Inspections and Enforcement

Inspection Responsibilities

The City of Garden Grove performs inspections of construction sites to verify that the requirements in **DAMP Section 8.2.6** are being implemented and maintained, that they appropriately comply with local permits and ordinances and the General Permit, and that they continue to protect water quality. Construction sites are inspected, according to the established priority, until construction activity is complete.

SECTION A-8, CONSTRUCTION

Inspection Frequencies

The City of Garden Grove inspects construction sites based upon the priority of the project. The frequency of construction site inspections is shown in **Table A-8.3**.

Table A-8.3
Inspection Frequency of Construction Projects Based on Construction Site Priority

Construction Site Priority <u>See Section 8.2.3 of the DAMP for prioritization details</u>	Rainy Season Inspection Frequency (Oct 1 - April 30)	Dry Season Inspection Frequency (May 1 - Sept 30)
<p style="text-align: center;">High</p> <p>The following sites are prioritized as mandatory high:</p> <ul style="list-style-type: none"> Any site 20 acres or larger Any site 1 acre or larger tributary to Clean Water Act Section 303(d) waters listed for sediment or turbidity impairments Any site, regardless of size, tributary to and within 500 feet of an area defined by the Ocean Plan as an Area of Special Biological Significance 	Once per month	As Needed
<p style="text-align: center;">Medium</p> <p>All sites between 5 and 20 acres are prioritized, at a minimum as medium priority</p>	Twice during the season	As Needed
Low	At Least Once during the season	As Needed
<p>***When BMPs or BMP maintenance is deemed inadequate or out of compliance, an inspection frequency of once every week will be maintained until BMPs and BMP maintenance are brought into compliance (regardless of site prioritization)***</p>		

SECTION A-8, CONSTRUCTION

Inspection Documentation Procedures

The City of Garden Grove's construction site inspection checklist is included in **Exhibit A-8.V**. Records of all inspections and non-compliance reporting will be retained for a period of at least five years.

Enforcement Actions

Enforcement of construction projects will be undertaken by the City of Garden Grove's inspectors and/or other staff who possess internal enforcement authority through established policies and procedures. Threat to water quality will be assessed by inspectors for construction site runoff that will not be reasonably controlled by the BMPs in place or if a failure of BMPs is resulting in the release of sediments or other pollutants. Violations observed will be documented by the inspectors.

If a significant and/or immediate threat to water quality is observed by an inspector, action will be taken to require the developer/contractor to immediately cease the discharge. **Table A-8.4** outlines the City of Garden Grove's enforcement steps that will be taken by inspectors for private construction projects and for public works construction projects. Depending on the violation, the inspector may choose to utilize contract language, a local permit, the grading ordinance or the water quality ordinance as the basis for enforcement.

Table A-8.4
Enforcement Actions for Construction Problems

PRIVATE CONSTRUCTION PROJECTS		PUBLIC WORKS CONSTRUCTION PROJECTS
Verbal Warning	← WARNING PROGRESSION	Verbal Warning
Written Warning <ul style="list-style-type: none"> ▪ Notice of Non-Compliance ▪ Administrative Compliance Order ▪ Administrative Citations or Fines ▪ Cease and Desist Order 		Written Warning <ul style="list-style-type: none"> ▪ Notice of Non-Compliance
Stop Work Order		Enforcement of Contract <ul style="list-style-type: none"> ▪ Stop Work Order ▪ Withholding of Payment ▪ Bond ▪ Fines ▪ Revocation of Contract
Revocation of Permit(s) and/or Denial of Future Permits		
Civil and Criminal Court Actions		Civil and Criminal Court Actions

City of Garden Grove approved enforcement forms used by inspection staff are provided in **Exhibit A-8.VI**.

Non-Compliance Reporting

The City of Garden Grove will consider a site non-compliant when one or more violations of local ordinances, permits, or plans exist on the site. For the purpose of this document, such a violation shall also be considered a violation of the General Construction Permit for sites subject to those requirements. If a non-compliant private construction project meets the criteria of posing a threat to human or environmental health as discussed in of the **DAMP Section 8.2.6.7**, then the appropriate Regional Board will be notified as required.

Oral notification to the Regional Board of non-compliant private construction sites that are determined to pose a threat to human or environmental health will be provided within 24-hours of the discovery of non-compliance. Such oral notification shall be followed up by a written report and submitted to the within 5 days of the incidence of non-compliance. Written notification(s) will identify the type(s) of non-compliance, describe the actions necessary to

SECTION A-8, CONSTRUCTION

achieve compliance, and include a time schedule, subject to the modifications by the indicating when compliance will be achieved.

A form for evaluating the potential impacts to human or environmental health is provided in **Exhibit A-8.VII**

A-8.3 EDUCATION AND TRAINING

To assist responsible municipal staff and contract staff in understanding the DAMP's Model Construction Program, annual training sessions will be conducted. In addition to Permittee sponsored training, staff may also attend training seminars or workshops related to general water quality and stormwater management during construction, conducted by other organizations. Required training for municipal employees is included in **Table A-3.2** of this LIP.

A-8.3.1 Training Modules

To support implementation of the Construction Program element, two construction activity training modules were developed during the Third Term Permits as described in DAMP Appendix B, Section B-8. The two modules are *Municipal Activities Program Management* (**DAMP Appendix B, Exhibit B-8.I**) and *Inspecting Construction Site BMPs* (**DAMP Appendix B, Exhibit B-8.II**). The modules will be substantially updated in 2010-11 to reflect the requirements of the Fourth Term Permits.

Additional Program Implementation Efforts (2010-2011 PEA):

- Additional training of Inspectors to QSP/XXX levels.
- Training of Engineers as well.
- Ensure 100% of construction sites are inspected per MS4 permit requirements.
- Ensure all contracted inspectors are trained within 60 days of employment.

In reporting year (2009-2010) it was proposed to inspect 100% of the construction inventory. In 2009-2010 reporting year 33% of inventory was inspected and 2010-2011 78%, a marked improvement, of inventory was inspected. A 34% increase in construction inspections indicated an improvement in interdepartmental coordination for construction site inspections. It is anticipated to have 100% of the construction inventory inspected for reporting year 2011-2012.

Exhibit A-8.I

Construction Site Inventory Spreadsheet

Exhibit A-8.II

Construction BMPs Fact Sheets

Exhibit A-8.III

OCEMA's 1999 Standard Plans for Construction Site BMPs

Exhibit A-8.V

Construction Inspection Checklist

Exhibit A-8.VI

Enforcement Forms

Exhibit A-8.VII

Form for Evaluating Threat to Human or Environmental Health

SECTION A-9, EXISTING DEVELOPMENT

A-9.0 EXISTING DEVELOPMENT

The existing development component of this plan is composed of the following elements:

1. **Section A-9.1**, Program Summary
2. **Section A-9.2**, Industrial/Commercial Program
3. **Section A-9.3**, Food Facility Inspection Program
4. **Section A-9.4**, Mobile Business Program
5. **Section A-9.5**, Residential Program
6. **Section A-9.6**, Common Interest Area/Homeowners Association Activities Program
7. **Section A-9.7**, Retrofitting Existing Development Program
8. **Section A-9.8**, Training Program Details

A-9.1 PROGRAM SUMMARY

A-9.1.1 Overview

The existing development component of this plan is comprised of eight programs: industrial, commercial, food facility, mobile business, residential, common interest and homeowner association areas, retrofitting existing development, and a training program.

The following outlines and describes City departments and staff that are responsible for implementation of the existing development component.

Public Works Department
A. J. Holmon III
Environmental/Streets Manager
(714) 741-5956
13802 Newhope Street
Garden Grove, CA 92843

Responsible for the operation and maintenance of flood control facilities. Field crews should receive training to identify industrial and commercial facilities and activities and residential activities that have potential to threaten receiving water quality.

Community Development Department
Susan Emery
Director
(714) 741- 5148
11222 Acacia Parkway
Garden Grove, CA 92840

SECTION A-9, EXISTING DEVELOPMENT

Staff oversees community development within City and assists residents with implementation of residential program.

Public Works Department
Allen Serna
Environmental Services Specialist
(714) 741-5278
13802 Newhope Street
Garden Grove, CA 92843

Public Works Department
Loriana Hornik
Sr. Environmental Services Specialist
(714) 741-5564
13802 Newhope Street
Garden Grove, CA 92843

Public Works Department
Devin Fitzgerald
Environmental Services Intern
(714) 741-5387
13802 Newhope Street
Garden Grove, CA 92843

Commercial and Industrial inspectors are responsible for inspecting industrial and commercial facilities for compliance with the industrial/commercial program and City code, and residential areas for compliance with the residential program and City codes.

Water Department, Sanitation Division
Contact Name: Dave Entsminger
Title: Water Services Manager
Telephone: (714) 741-5561
Address: 13802 Newhope Street, Garden Grove, Ca 92843

Wastewater inspectors are trained to inspect, monitor, and evaluate commercial/industrial facilities and activities. The department is also responsible for promoting water conservation practices within residential areas, an effective form of pollution prevention.

Local Fire Department
Contact Name: Dave Barlag
Title: Deputy Chief/Operations Manager
Telephone: (714) 741-5618
Address: 11301 Acacia Pkwy Garden Grove, CA 92840

Inspects businesses within City for compliance with Uniform Fire Code and responds to 911

SECTION A-9, EXISTING DEVELOPMENT

emergencies involving industrial and commercial discharges, spills, accidents, etc.

Public Agencies

In addition to the City Departments described, the City relies on certain public agencies for successful implementation of the industrial program.

Orange County Health Care Agency
Environmental Health Division
Certified Unified Program Agency (CUPA)

The Environmental Health Division of the Orange County Health Care Agency inspects businesses within the City that generate hazardous waste for compliance with State and Federal regulations. Proper storage and care of hazardous waste is an important component of pollutant source control.

Orange County Health Care Agency
Environmental Health
Food Facility Inspection

Conducts inspections of all food facilities within the City as described in **Section 9.3** of the **DAMP**.

A-9.1.2 Program Commitments

The major program commitments and the subsections in which they are described in detail include:

- Inspection of industrial and commercial facilities (**A-9.2**);
- Inspection of Food Service Establishments (**A-9.3**)
- Regulation of mobile businesses (**A-9.4**)
- Oversight of residential areas **A-9.5**
- Oversight of Common Interest Area/Homeowners Association Activities Program **A-9.6**
- Existing development retrofitting (**A-9.7**)
- Training (**A-9.8**)

A-9.1.3 Regulatory Requirements

The program described in this section was developed pursuant to Sections IX and X of the Santa Ana Order and **DAMP Section 9.2**.

A-9.2 INDUSTRIAL/COMMERCIAL PROGRAM

The City of Garden Grove's Industrial/Commercial Program includes specifications for pollution-prevention methods for industrial and commercial areas and activities located within the City. Specific pollution prevention practices that are generally recognized in each Discharger's industry or business, or for that Discharger's activity, as being effective and economically advantageous, were certified by the City (see **Section A-9.1.5**). The City through an inspection program summarized in **Section A-9.1.6** will verify implementation of pollution-prevention methods by industries and commercial facilities. Inspectors will use a checklist for their inspections, which will also include appropriate pollution-prevention methods.

A-9.2.1 Source Identification and Facility Inventory

The City of Garden Grove develops and annually updates a watershed-based inventory of all industrial sites within its jurisdiction, regardless of site ownership. The process for conducting the inventory is explained in the **DAMP Section 9.2.1**. The components that comprise the inventory include:

- All industrial facilities located within the City's jurisdiction
- All commercial facilities listed in **Table 9-3** from **DAMP Section 9.2.1** that are located within the City's jurisdiction.
- Watersheds where each industrial or commercial facility is located
- Identified potential pollutants and activities with the potential to discharge pollutants
- Identified industrial or commercial discharges into, or adjacent to, an Area of Special Biological Significance (ASBS).

The City's inventory database includes the following information about each identified industry or commercial facility within the City's jurisdiction:

- Business Name;
- Physical Address Information;
- Mailing Address Information;
- Business Contact Name
- Lot Size
- SIC Code;
- Industrial-Specific Information
- Commercial-Specific Information
- Watershed;
- GIS Information;
- Local Licensing/Permits
- Proximity to and/or discharge to ESA;/ASBS
- Comments/Notes.

SECTION A-9, EXISTING DEVELOPMENT

The current watershed-based inventory of industrial facilities within the city's jurisdiction is provided in **Exhibit A-9.I**. A GIS map showing the location of these industrial facilities and their proximity to ESAs has also been provided as part of **Exhibit A-9.I**.

A-9.2.2 Prioritization for Inspection

The City of Garden Grove prioritizes industrial and commercial sites and sources as *high*, *medium*, and *low*, based on their respective threat to water quality and the procedures set forth in **DAMP Section 9.2.2.2**. A classification of High Priority indicates that the facility contains a site or sources with a high potential threat to the water quality. Permit requirements classify some industries as mandatory High Priority facilities. For industries that were not pre-classified, the prioritization process, which is consistent with permit requirements as outlined in **DAMP Section 9.2.2.2**, consisted of assigning a score to each facility based on the following factors:

- Type of Activity
- Material Used
- Waste Generated
- Pollutant Discharge Potential
- Non-Stormwater Discharges
- Size of Facility
- Proximity to an Environmentally Sensitive Water Body

Industries that received a score of greater than or equal to 25 were ranked as High Priority, those with a score below 25 and greater than 15 were ranked as Medium Priority, and those with a score less than or equal to 15 were ranked as low priority.

A-9.2.3 BMP Implementation

The City of Garden Grove has designated a minimum set of activity-specific BMPs for industrial and commercial facilities, as set forth in **DAMP Section 9.2.3** and modified according to City requirements. The City has designated the BMPs shown in **Tables A-9.1 and A-9.2** below that are appropriate to prevent or mitigate pollution generated from the specific activities at each site. The corresponding fact sheets are presented in **Exhibit A-9.II**.

**Table A-9.1
Industrial Activity BMPs**

BMP Fact Sheet	Activity
IC1.	AIRPLANE MAINTENANCE AND REPAIR
IC2.	ANIMAL HANDLING AREAS

SECTION A-9, EXISTING DEVELOPMENT

IC3.	BUILDING MAINTENANCE
IC4.	CARPET CLEANING
IC5.	CONCRETE AND ASPHALT PRODUCTION, APPLICATION, AND CUTTING
IC6.	CONTAMINATED OR ERODIBLE SURFACES AREAS
IC7.	LANDSCAPE MAINTENANCE
IC8.	NURSERIES AND GREENHOUSES
IC9.	OUTDOOR DRAINAGE FROM INDOOR AREAS
IC10.	OUTDOOR LOADING/UNLOADING OF MATERIALS
IC11.	OUTDOOR PROCESS EQUIPMENT OPERATIONS AND MAINTENANCE
IC12.	OUTDOOR STORAGE OF RAW MATERIALS, PRODUCTS, AND CONTAINERS
IC13.	OVER WATER ACTIVITIES
IC14.	PAINTING, FINISHING, AND COATINGS OF VEHICLES, BOATS, BUILDINGS, AND EQUIPMENT
IC15.	PARKING AND STORAGE AREA MAINTENANCE
IC16.	POOL AND FOUNTAIN CLEANING
IC17.	SPILL PREVENTION AND CLEANUP
IC18.	VEHICLE AND EQUIPMENT FUELING
IC19.	VEHICLE AND EQUIPMENT MAINTENANCE AND REPAIR
IC20.	VEHICLE AND EQUIPMENT WASHING AND STEAM CLEANING
IC21.	WASTE HANDLING AND DISPOSAL
IC22.	EATING AND DRINKING ESTABLISHMENTS
IC23.	FIRE SPRINKLER TESTING/MAINTENANCE
IC 24.	WASTE WATER DISPOSAL GUIDELINES

Table A-9. 2
Commercial BMPs

Activities/Sources	BMP Fact Sheets
Automobile mechanical repair, maintenance, fueling, or cleaning	IC18. VEHICLE AND EQUIPMENT FUELING IC19. VEHICLE AND EQUIPMENT MAINTENANCE AND REPAIR IC20. VEHICLE AND EQUIPMENT WASHING AND STEAM CLEANING
Transport, storage or transfer of pre-production plastic pellets.	IC 17. SPILL PREVENTION AND CLEAN UP IC 21. WASTE HANDLING AND DISPOSAL
Airplane mechanical repair, maintenance, fueling, or cleaning	IC1. AIRPLANE MAINTENANCE AND REPAIR IC18. VEHICLE AND EQUIPMENT FUELING IC19. VEHICLE AND EQUIPMENT MAINTENANCE AND REPAIR IC20. VEHICLE AND EQUIPMENT WASHING AND STEAM CLEANING
Marinas and boat maintenance, fueling, or cleaning	IC13. OVER WATER ACTIVITIES IC18. VEHICLE AND EQUIPMENT FUELING IC19. VEHICLE AND EQUIPMENT MAINTENANCE AND REPAIR IC20. VEHICLE AND EQUIPMENT WASHING AND STEAM CLEANING
Equipment repair, maintenance, fueling, or cleaning	IC18. VEHICLE AND EQUIPMENT FUELING IC19. VEHICLE AND EQUIPMENT MAINTENANCE AND REPAIR IC20. VEHICLE AND EQUIPMENT WASHING AND STEAM CLEANING
Automobile and other vehicle body repair or painting	IC14. PAINTING, FINISHING, AND COATINGS OF VEHICLES, BOATS, BUILDINGS, AND EQUIPMENT IC19. VEHICLE AND EQUIPMENT MAINTENANCE AND REPAIR
Mobile automobile or other vehicle washing	IC20. VEHICLE AND EQUIPMENT WASHING AND STEAM CLEANING
Automobile impound and storage facilities	IC15. PARKING AND STORAGE AREA MAINTENANCE
Retail or wholesale fueling	IC18. VEHICLE AND EQUIPMENT FUELING
Pest control services	IC7. LANDSCAPE MAINTENANCE IC21. WASTE HANDLING AND DISPOSAL

SECTION A-9, EXISTING DEVELOPMENT

Activities/Sources	BMP Fact Sheets
Eating or drinking establishments	IC22. EATING AND DRINKING ESTABLISHMENTS
Mobile carpet, drape or furniture cleaning	IC4. CARPET CLEANING IC 24. WASTE WATER DISPOSAL
Cement mixing or cutting	IC5. CONCRETE AND ASPHALT PRODUCTION, APPLICATION, AND CUTTING
Masonry	IC5. CONCRETE AND ASPHALT PRODUCTION, APPLICATION, AND CUTTING
Building materials retail and storage facilities	IC15. PARKING AND STORAGE AREA MAINTENANCE IC 17. SPILL PREVENTION AND CLEAN UP IC 21. WASTE HANDLING AND DISPOSAL
Building Maintenance and Light Construction	IC3. BUILDING MAINTENANCE IC5. CONCRETE AND ASPHALT PRODUCTION, APPLICATION, AND CUTTING IC6. CONTAMINATED OR ERODIBLE SURFACES AREAS
Outdoor Activities	IC6. CONTAMINATED OR ERODIBLE SURFACES AREAS IC9. OUTDOOR DRAINAGE FROM INDOOR AREAS IC10. OUTDOOR LOADING/UNLOADING OF MATERIALS IC11. OUTDOOR PROCESS EQUIPMENT OPERATIONS AND MAINTENANCE IC12. OUTDOOR STORAGE OF RAW MATERIALS, PRODUCTS, AND CONTAINERS
Painting and coating	IC14. PAINTING, FINISHING, AND COATINGS OF VEHICLES, BOATS, BUILDINGS, AND EQUIPMENT
Botanical or zoological gardens and exhibits	IC2. ANIMAL HANDLING AREAS IC7. LANDSCAPE MAINTENANCE IC8. NURSERIES AND GREENHOUSES
Landscaping	IC7. LANDSCAPE MAINTENANCE
Nurseries and greenhouses	IC8. NURSERIES AND GREENHOUSES
Animal facilities (petting zoos, boarding and training facilities)	IC 2. ANIMAL HANDLING AREAS

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Activities/Sources	BMP Fact Sheets
Golf courses, parks and other recreational areas/facilities	IC6. CONTAMINATED OR ERODIBLE SURFACES AREAS IC7. LANDSCAPE MAINTENANCE
Cemeteries	IC7. LANDSCAPE MAINTENANCE
Pool and fountain cleaning	IC16. POOL AND FOUNTAIN CLEANING
Port-a-Potty servicing	IC21. WASTE HANDLING AND DISPOSAL

The City encourages the implementation of the designated BMPs at each industrial and commercial facility based on site-specific conditions in order to limit that facility's impact upon receiving water quality. If particular BMPs are infeasible at any specific site, other equivalent BMPs will be implemented.

A-9.2.4 Inspection and Enforcement

A-9.2.4.1 Inspection

Inspection frequencies for industrial facilities are based on permit requirements and the priority ranking assigned to each facility as described in **Section A-9.2.2**. A summary of required inspection frequencies based on priority ranking is shown in **Table A-9.3**. In addition to the inspection frequencies described, the City investigates all complaints of illegal discharges from industrial and commercial facilities made by the public or by another agency or those violations arising from the results of dry-weather field screening or analytical monitoring program. In the event that a site is found to be non-compliant, inspection frequency will be increased to, at a minimum, once per month. Once a facility has been brought into compliance, an inspection frequency of once every six months will be maintained for the next calendar year following the date at which the facility is deemed to be in compliance.

Table A-9.3
Inspection Schedule Based on Priority Ranking

Priority	Inspection Frequency
High	Annually
Medium	Biannually
Low	Once per permit cycle (5 years)

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The City of Garden Grove inspects industrial facilities to determine if they are in compliance with City ordinances, to review BMP implementation, to assess BMP effectiveness and to verify inventory information used for facility prioritization. Such inspections include review of:

- Material and waste handling and storage practices,
- Pollution control BMP implementation and maintenance, and
- Evidence of past or present unauthorized, non-storm water discharges.

The inspection form provided in **Exhibit A-9.III** will be used and provides a series of questions about specific activities taking place at a facility, as well as a list of suggested corrective actions that can be implemented should a problem be found.

In general the City of Garden Grove will conduct one of two types of inspections:

- **Compliance Inspections**

Initial compliance inspections will be announced so that the inspector can meet with responsible facility official(s) (e.g., owner, superintendent, compliance manager, engineering consultant, etc.) in order to provide more efficient communication of the storm water requirements and inspection goals. The inspection will focus on current facility operations and activities, BMPs currently in use, and the effectiveness of those BMPs. This inspection will also focus on verifying inventory spreadsheet information and, whenever possible, provide outreach education to facility staff. All re-occurring compliance inspection will cover the same information as an initial compliance inspection, but will typically be unannounced in order to verify compliance and that BMPs are being effectively implemented.

- **Follow-up Inspections**

For those facilities deemed to be non-compliant, the Permittee will perform compliance inspections once a month until said facilities are shown to be compliant, and then once every four months for a full calendar year after the facility achieves compliance. Generally, these inspection will be similar to Advisory Inspection except that a) they will focus primarily on areas where a facility was deemed to be non-compliant and b) the inspections may be announced or unannounced, depending on which course of action the Permittee deems will be most conducive to continued facility compliance.

Should an inspected site demonstrate non-compliance, the City will coordinate the notification of appropriate agencies. An incident or practice of non-compliance that requires a hazardous materials emergency response will be considered a threat to human or environmental health and will be reported to the RWQCB and to appropriate hazardous waste management agencies. The City will provide oral notification to the RWQCB within 24 hours of the discovery of a non-compliant site meeting the criteria listed below. This will also be followed by written notification within 5 days of the discovery.

Criteria to be used to determine whether an event of non-compliance poses a threat to human or environmental health include the following:

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- The event poses a significant or imminent threat to the quality of surface or ground waters and/or their beneficial uses.
- The event results in a spill or discharge of hazardous materials in excess of reportable quantities (as listed in 40 CFR Part 117 or 302).
- The event results in a spill or discharge of hazardous materials requiring a hazardous materials emergency response (see **DAMP Section 10**).

A-9.2.4.2 Enforcement

City inspectors with enforcement authority will issue enforcement actions to industrial and commercial facility owners and operators determined to be out of compliance as detailed in **DAMP Section 9.2.4**. The inspectors will document each observed violation. Depending on the severity of the violation, enforcement actions can range from a verbal warning to civil or criminal court actions with monetary fines.

If a City inspector observes a significant and/or immediate threat to water quality, action will be taken to require the facility owner and/or operator to immediately cease the discharge.

The enforcement mechanisms available to inspectors, as detailed in **DAMP Section 9.2.4**, are as follows (in increasing order of severity):

- Notice of Non-compliance
- Administrative compliance orders
- Cease and desist orders
- Infractions and misdemeanors

City inspectors will apply or recommend any of the enforcement steps as appropriate based on the enforcement consistency guide (Included as an **Exhibit 4.I of DAMP Section 4**). The City of Garden Grove will ensure that violations of a similar nature are subjected to similar types of enforcement remedies.

A-9.2.3 Outreach and Education

The outreach strategy for reaching industrial businesses includes efforts such as including providing stormwater information of on the City's/ County's webpage, conducting mass mailings, holding workshops, and development and distribution of brochures, posters, fact sheets, etc. The outreach component of **DAMP Section 6.0** goes into specific detail on requirements for the approach of outreach efforts and the materials that have currently been developed are included in **DAMP Appendix B, Section B-6**.

A-9.3 FOOD SERVICE FACILITIES INSPECTION PROGRAM

SECTION A-9, EXISTING DEVELOPMENT

The program described in this section was developed pursuant to Section X.9 of the Santa Ana Order and **DAMP Section 9.3**.

On behalf of the Permittees, the Orange County Health Care Agency (OCHCA) conducts the annual water quality inspection on all food service facilities, per the Food Facility Inspection Program described in **DAMP Section 9.3**. Water quality issues are documented and included in the OCHCA's monthly reports. The Permittees are responsible for conducting follow-up inspection on facilities with water quality issues to confirm the implementation of best management practices for pollution prevention and to address the following activities:

1. Trash storage and disposal;
2. Grease storage and disposal;
3. Maintenance of trash collection area and grease interceptors;
4. Proper discharge of wash water (e.g., from floor mats, driveways, sidewalks, etc.);
5. Identification of outdoor sewer and MS4 connections; and
6. Education of property managers when grease and/or trash facilities are shared by multiple facilities.

A-9.4 MOBILE BUSINESS PROGRAM

The program described in this section was developed pursuant to Section X.8 of the Santa Ana Order and DAMP Section 9.4.

The mobile surface cleaner businesses addressed in this program are those which provide one or more of the following services:

1. Cleaning (e.g., power sweeping, washing) driveways and parking lots;
2. Cleaning building exteriors (except sand blasting, window cleaning);
3. Driveway cleaning (e.g., power sweeping, washing) services;
4. Parking lot cleaning (e.g., power sweeping, washing); services;
5. Power washing building exteriors;
6. Pressure washing (e.g. buildings, decks, fences); and
7. Steam cleaning building exteriors

An Implementation Strategy was developed to identify the framework for the mobile business pilot program and is included as **DAMP Exhibit [RESERVED]**.

A-9.4.1 Mobile Business Inventory

The City of Garden Grove updates as needed the list of mobile surface cleaner businesses that report their business address as being within the City per the inventory protocol described in **DAMP Section 9.4**.

A-9.4.2 Best Management Practice (BMP) Implementation

SECTION A-9, EXISTING DEVELOPMENT

The City of Garden Grove has designated a minimum set of activity-specific BMPs for mobile surface cleaner businesses, per **DAMP Section 9.4.2**. These BMPs are presented in the form of a Surface Cleaner BMP Fact Sheet, included as **DAMP Exhibit [GET]**.

A-9.4.3 Inspections/Self-certifications

On a biennial basis, the City of Garden Grove will ensure that each known mobile surface cleaner business whose headquarters is listed within the City's jurisdiction achieves one of the following end points:

1. Successful completion of an online training program; or
2. Completion of a self-certification form; or
3. Inspection conducted by the Permittee

A-9.4.4 Enforcement

A-9.2.4.3 Enforcement

City inspectors with enforcement authority will issue enforcement actions to mobile business owners and operators determined to be out of compliance as detailed in **DAMP Section 9.2.4**. The inspectors will document each observed violation. Depending on the severity of the violation, enforcement actions can range from a verbal warning to civil or criminal court actions with monetary fines.

If a City inspector observes a significant and/or immediate threat to water quality, action will be taken to require the mobile business owner and/or operator to immediately cease the discharge.

The enforcement mechanisms available to inspectors, as detailed in **DAMP Section 9.2.4**, are as follows (in increasing order of severity):

- Notice of Non-compliance
- Administrative compliance orders
- Cease and desist orders
- Infractions and misdemeanors

While these measures typically escalate in enforcement action, they are not required to be issued in the exact order presented here. City inspectors will apply or recommend any of the enforcement steps as appropriate based on the enforcement consistency guide (Included as **DAMP Exhibit 4.I**). The City of Garden Grove will ensure that violations of a similar nature are subjected to similar types of enforcement remedies.

A-9.5 RESIDENTIAL PROGRAM

The program described in this section was developed pursuant to Section XI of the Santa Ana Order and **DAMP Section 9.5**.

A-9.5.1 Program Overview

The City of Garden Grove's Residential Program includes specifications for pollution-prevention methods for residential areas and activities located within the City. Specific pollution prevention practices that are recognized for each residential activity with high potential to pose a threat to water quality, as being effective and economically advantageous, are provided in the activity fact sheets presented in **Exhibit A-9.II**. The City will use the implementation strategies discussed in **Section A-9.5.4** to encourage pollution prevention.

A-9.5.2 Source Identification and Inventory

The City of Garden Grove has identified the following potential areas and activities that pose a high threat to water quality by following the procedure outlined in **DAMP Section 9.5.2**.

- *Residential auto washing and maintenance activities;*
- *Use and disposal of pesticides, herbicides, fertilizers and household cleaners; and*
- *Collection and disposal of pet wastes*

These residential activities are assumed to occur with equal likelihood in all residential areas within the City's jurisdiction. The implementation of the residential program is designed to address these activities on a citywide basis.

A-9.5.3 Best Management Practice Requirements

The City of Garden Grove has designated a minimum set of activity-specific BMPs for residential activities, as set forth in **DAMP Section 9.5** and modified according to City requirements. The City has selected the BMPs shown in **Table A-9.3** below that are appropriate to prevent or mitigate pollution generated from the specific activities typical of residences within the jurisdiction. The corresponding BMP fact sheets are included as **Exhibit A-9.II**. The City requires the implementation of the designated BMPs at each residence to limit the potential impact of the residential activities on receiving water quality.

Table A-9.3
Designated Residential Activities BMPs

Activity	BMP Fact Sheet
Automobile Repair and Maintenance	R-1
Automobile Washing	R-2
Automobile Parking	R-3
Home and Garden Care Activities	R-4
Disposal of Pet Wastes	R-5
Disposal of Green Wastes	R-6
Household Hazardous Waste BMPs	R-7
Water Conservation	R-8

A-9.5.4 Program Implementation

The implementation of the residential program will rely on education and outreach to notify and urge residents to observe the designated sets of BMPs for each of the high threat activities. The City will encourage the implementation of the designated BMPs for each residence within its jurisdiction by conducting the following as appropriate:

- *Training City Personnel* who have regular contact with residential areas (e.g. park maintenance personnel, street sweepers, code enforcement officers, etc.) to serve as informal inspectors performing field reviews.
- *Responding to Hotline Calls* by activating trained field review response personnel.
- *Updating the City's Website* (<http://www.ci.garden-grove.ca.us/?q=pw/stormwater>) by providing the BMP fact sheets and information on residential stormwater pollution prevention.
- *Conducting Annual Mailings* which include the BMP fact sheets as well as information on household hazardous waste collection sites, and dates and times of operation. Included in mailings will be the City's contact information, the City hotline number (714) 741-595 or (714) 741-5375, and a statement to call 911 in an emergency situation. Each mailing will be posted on the County's website.
- *Public Service Announcements* reminding residents that the storm drain system conveys untreated water to the ocean using the established theme, "The Ocean begins at your front door." Announcements shall also include reminders that the County hotline number is a 24-hour service.

A-9.5.5 Enforcement

Enforcement actions may be initiated by the City as a response to hotline reports and complaints, or by observations by City representatives. All enforcement actions will be

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documented and recorded for subsequent inclusion in the City's annual progress report. The enforcement mechanisms available to field reviewers, as detailed in **DAMP Section 10** and the Water Quality Ordinance are as follows (in increasing order of severity):

- Notice of Non-compliance;
- Administrative Compliance Order;
- Cease and Desist Orders;
- Infractions and Misdemeanors.

While these measures typically escalate in enforcement action, they need not be issued in the exact order presented here. City officials will apply or recommend any of the enforcement steps as appropriate based on the enforcement consistency guide, **DAMP Section 4, Exhibit 4.I**. The City will ensure that violations of a similar nature are subjected to similar types of enforcement remedies. Samples of the enforcement forms to be used by City Authorized Water Quality Ordinance inspectors are included in **Exhibit A-9.V**.

A-9.6 COMMON INTEREST AREAS/HOMEOWNERS ASSOCIATION ACTIVITIES PROGRAM

The common interest area and homeowners association (CIA/HOA) program described in this section was developed pursuant to Section XI.4 of the Santa Ana Order and **DAMP Section 9.6**.

A-9.6.1 Program Overview

The City of Garden Grove's Common Interest Area (CIA) / Homeowner Association Area (HOA) Activities Program includes specifications for pollution-prevention methods for CIA/HOA areas and activities located within the City. Specific pollution prevention practices that are recognized for each CIA/HOA activity with high potential to pose a threat to water quality, as being effective and economically advantageous, are provided in the activity fact sheets presented in **Exhibit A-9.II**. The City will use the implementation strategies discussed in **Section A-9.6.5** to encourage pollution prevention.

A-9.6.2 Current Practices and Activities of Concern

DAMP Section 9.6.2.2 lists high priority activities that commonly occur in CIA/HOA areas, and describes the potential pollutants generated by these activities. **Table A-9.9**, presented below, illustrates the relationship of these activities and the potential pollutants they generate.

Table A-9.4
Potential Pollutants from CIA/HOA Activities

Activity	Potential Pollutants
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	Sediments	Nutrients ^a	Pathogens/ Coliform ^b	Foaming Agents	Metals	Hydrocarbons	Hazardous Materials ^c	Pesticides and herbicides	Other ^d
Sidewalk, plaza and fountain cleaning	X	X	X	X			X		
Landscape maintenance	X	X	X				X	X	
Home and garden care	X	X	X	X	X		X	X	X
Pet waste	X	X	X						
Garden waste	X	X	X				X	X	
Automobile parking	X				X	X	X		
Community center O&M	X	X	X						X
Recreation area O&M	X	X	X					X	
Maintenance yard operation	X	X	X	X	X	X	X	X	X

^aNitrogen and Phosphorous compounds.

^bIncluding fecal and total coliform, E. coli, etc.

^cIncluding chlorinated hydrocarbons, paint, etc.

^dIncluding bleach, etc.

A-9.6.3 Prioritization of Locations

[RESERVED]

A-9.6.4 Best Management Practices Implementation

The City of Garden Grove has designated a minimum set of activity-specific BMPs for CIA/HOA areas listed in **Table A-9.5** and **Table A-9.6**, and presented in the fact sheets included in **Exhibit A-9.II**. Each CIA/HOA area is expected to implement those BMPs that are associated with the activities being conducted. If the desired result is not being achieved, the BMPs will be assessed and modified or, if necessary, changed.

Table A-9.5
BMPs for CIAs/HOAs with Publicly-Owned and Maintained Streets and Stormdrains

ACTIVITY	BMP	Fact Sheet ¹
Parking vehicles on residential streets, in driveways, or in common area parking lots	Automobile parking BMPs	R-3
Washing vehicles in residential driveways or street	Automobile washing BMPs	R-2
Disposal of household hazardous	Household Hazardous waste	R-7

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wastes such as paint, bleach, etc.	BMPs	
Cleaning of CIA/HOA sidewalks, plaza, and entry monuments and fountains	Sidewalk, plaza, and entry monument and fountain maintenance BMPs	FP-4
Landscape maintenance including irrigation and fertilization	Landscape maintenance BMPs	FP-2 IC-7
Operation and maintenance of community pools	Pool cleaning BMPs	IC-16
Operations and maintenance of recreation areas such as stables, golf courses, and parks	Disposal of Pet Waste BMPs Landscape Maintenance BMPs Disposal of Green Waste BMPs	R-5 FP-2 R-6
Maintenance Yard BMPs		
Activity	BMP	Fact Sheet
Vehicle maintenance and repair	Equipment maintenance and repair BMPs	FF-3
Vehicle fueling	Vehicle fueling BMPs	FF-4
Storage of vehicles and equipment	Vehicle and equipment storage BMPs	FF-12
Cleaning of vehicles and equipment	Vehicle and equipment cleaning BMPs	FF-11
Storage, handling, and disposal of various materials such as cleaners	Material storage, handling, and disposal BMPs	FF-13
Loading and unloading of materials	Material loading and unloading BMPs	FF-6

Table A-9.6
BMPs for CIAs/HOAs with Privately-Owned and Maintained Streets and Storm Drains

Includes all the BMPs listed for Publicly-owned CIAs/HOAs from Table 9-11 of the DAMP plus the following:

ACTIVITY	BMP	Fact Sheet¹
Street sweeping	Street sweeping BMPs	FP-3
Trash collection, recycling, and disposal	Solid waste handling BMPs	FF-13
Inspection and cleaning of storm drains	Drainage system operation and maintenance BMPs	DF-1
Operation and maintenance of water	Water and sewer utility operation	FP-6

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and sewer lined (not controlled by utility company)	and maintenance BMPs	
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A-9.6.5 Implementation Strategy

The City of Garden Grove's plan for implementing the CIA/HOA Program follows the process outlined in **DAMP Section 9.6.5.2**. The City's implementation plan includes education and outreach as described both in that section and in **DAMP Section 6.0**.

The following implementation efforts will be utilized for all CIAs/HOA areas within the City's jurisdiction :

- Mail letter explaining CIA/HOA program to association governing board. The letter will explain activities of concern and their environmental impacts, BMPs to reduce the impact, and consequences of not complying with the CIA/HOA program. The letter will also encourage participation in annual outreach workshops as described in **DAMP Section A-9.6.5**.
- Mail BMP fact sheets to maintenance association governing board

A-9.6.6 Enforcement

Enforcement mechanisms available to the City of Garden Grove, as detailed in **DAMP Section 10.0**, are as follows (in increasing order of severity):

- Notice of Non-compliance (verbal and/or written warnings, to individual resident or CIA/HOA Board)
- Administrative Compliance Order (written notice to CIA/HOA Board)
- Cease and Desist Order (written notice to CIA/HOA Board)
- Civil or Criminal Enforcement (includes fines and assessments levied on CIA/HOA Board and/or individual resident)

While these measures typically escalate in enforcement action, they need not be issued in the exact order presented here. City officials will apply or recommend any of the enforcement steps as appropriate based on the enforcement consistency guide, Section 10 of the DAMP. The City will ensure that violations of a similar nature are subjected to similar types of enforcement remedies.

A-9.7 RETROFITTING EXISTING DEVELOPMENT PROGRAM

<Insert for Santa Ana Region Permit only> [RESERVED]

Table A-9.7
Potential On-site LID, Storage and Treatment BMP Retrofit Project Benefits

Project Type	Relative Cost	Storm Flow Attenuation	Stormwater Pollutant Removal	Water Conservation	Energy Conservation	Air Quality	Aesthetics	Installation Difficulty	Maintenance Need
<i>LID BMPs/Source Controls</i>									
Vegetated Swales)	((;	;	;	())
Biofiltration Planters	(()	((()	((
Reduce Impervious Area	(((;	;	()	()
Disconnect impervious area	(((;	;	((()
Porous pavement	(()	;	;	;	(;	(
Landscape enhancement)	(;))))	((
Efficient irrigation)	(;)))	()	(
Beneficial re-use	;)))))	;	;	;
<i>Stormwater Detention/ Storage Structures</i>									
Green roof	;))	;)))	;	(
Above-surface storage	()	(((;	;	((
Below-surface storage	;)	(((;)	;	(
<i>Stormwater Treatment Process Units</i>									
Gravity/vortex separator units	;	;)	;	;	;	;	;	;
Trash screen/filter at inlets)	;)	;	;	;	;)	(
Filtration vaults	;	;)	;	;	;	;	;	;

) Higher benefit (Moderate to low benefit ; No effect or higher impact

A-9.8 TRAINING PROGRAM

To assist responsible municipal staff and contract staff in understanding the DAMP's Model Construction Program, annual training sessions will be conducted. In addition to Permittee sponsored training, staff may also attend training seminars or workshops related to general water quality and stormwater management during construction, conducted by other organizations. Required training for municipal employees is included in **Table A-3.2** of this LIP.

A-9.8.1 Training Modules

SECTION A-9, EXISTING DEVELOPMENT

To support implementation of the Existing Development Program element, six training modules were developed during the Third Term Permits as described in DAMP Appendix B, Section B-9. The modules include *Existing Development Program Management Module (Appendix B, Exhibit B-9.I)*, *Field Implementation of Existing Development Program Module (Appendix B, Exhibit B-9.II)* and *Industrial Stormwater Monitoring Module (Appendix B, Exhibit B-9.VI)*. The modules will be substantially updated in 2010-11 to reflect the requirements of the Fourth Term Permits.

Additional Program Implementation Efforts (2010-2011 PEA):

- Increase the number of follow up inspections that need to be conducted due to facilities being in non-compliance during inspections.

The 2011 LIP Section 9 reported the use of a Commercial/Industrial Business form which was generated to give to business license applicants which will be opening specific types of businesses. The completed forms are sent to Environmental to then inspect once it is operational and determine if they should be included into the Commercial/Industrial business database.

Additionally, it was recognized that the number of non-compliant businesses that required follow up inspections needed to increase. The number of follow up inspections in 2009-2010 reporting year was 1 and in 2010-2011 was 9 which shows some improvement in the number of follow up inspections being performed. For reporting year 2011-2012 the total number of follow up inspections that are conducted will continue to increase.

A-10.0 ILLEGAL DISCHARGES/ILLICIT CONNECTIONS COMPONENT

The illegal discharges/illicit connection component of this plan is composed of the following elements:

1. **Section A-10.1**, Program Summary
2. **Section A-10.2**, Illegal Discharges/Illicit Connections Program
3. **Section A-10.3**, Education and Enforcement
4. **Section A-10.4**, Training and Outreach

A-10.1 PROGRAM SUMMARY

Since illegal discharges and illicit connections (ID/ICs) are potential significant sources of pollutants for the municipal storm drain system, the City is implementing a comprehensive program for detecting, responding to, investigating and eliminating ID/ICs in an efficient and timely manner.

A-10.1.1 Program Overview

The ID/IC Program provides guidance for City staff when identifying, responding, mitigating and enforcing the ID/ICs for the protection of public health and the environment. In addition, it provides the framework and a process for conducting the following NPDES permit compliance activities for the ID/IC Program:

- Program administration
- Detection of illegal discharges and illicit connections
- Responding to water pollution incidents and complaints
- Inspections/investigations
- Education/Enforcement
- Training

A-10.1.2 Program Commitments

The major program commitments and the subsections in which they are described in detail include:

- Investigation and abatement of ID/ICs (**A-10.2**);
- Education and Enforcement (**A-10.3**); and
- Training (**A-10.4**), and Outreach.

A-10.1.3 Regulatory Requirements

The program described in this section was developed pursuant to Sections VII of the Santa Ana Order and **Section 10.0** of the DAMP

A-10.2 ILLEGAL DISCHARGES/ILLCIT CONNECTIONS PROGRAM

A-10.2.1 Program Introduction

The ID/IC Program establishes a process through which illegal discharges and illicit connections to the MS4 are actively detected and eliminated. In order to be effective, the ID/IC Program has been integrated with the municipal, industrial, commercial, residential and construction inspection programs so that if an illegal discharge or illicit connection is discovered during an inspection it can be properly addressed and eliminated. In addition, on behalf of the Permittees, the Principal Permittee implements the water quality monitoring programs which can also assist in identifying illegal discharges and illicit connections. Illegal discharges and illicit connections that are discovered as a result of integrated efforts will be addressed pursuant to this Section.

A-10.2.2 Program Administration and Implementation

Assigning roles and responsibilities reduces the duplication of efforts and increases program efficiency and effectiveness.

Roles and Responsibilities

The key roles and assigned staff for the ID/IC Program include the following:

Authorized Inspectors

The Authorized Inspector(s) (AI) are assigned to investigate compliance with and detect incidences of violations of the Ordinance. The designated authorized inspectors are:

Contact Name: A. J. Holmon
Title: Environmental/Streets Manager
Telephone: (714) 741-5956
Address: 13802 Newhope Street, Garden Grove Ca 92843

Contact Name: Lorian Hornik
Title: Sr. Environmental Services Specialist
Telephone: (714) 741-5564
Address: 13802 Newhope Street, Garden Grove Ca 92843

Contact Name: Allen Serna
Title: Environmental Services Specialist
Telephone: (714) 741-5278

Address: 13802 Newhope Street, Garden Grove Ca 92843

Spill Responder

The Spill Responder (SR) can be an AI or other authorized personnel responsible for coordinating with the fire department for the immediate response to any accidental spills, leak or prohibited discharge of pollutants requiring clean-up. The designated spill responders are:

Contact Name: A. J. Holmon
Title: Environmental/Streets Manager
Telephone: (714) 741-5956
Address: 13802 Newhope Street, Garden Grove Ca 92843

Contact Name: Lorian Hornik
Title: Sr. Environmental Services Specialist
Telephone: (714) 741-5564
Address: 13802 Newhope Street, Garden Grove Ca 92843

Contact Name: Allen Serna
Title: Environmental Services Specialist
Telephone: (714) 741-5278
Address: 13802 Newhope Street, Garden Grove Ca 92843

Enforcing Attorney

The Enforcing Attorney is the City Attorney acting as counsel for the Permittee, and their appointee. For purposes of criminal prosecution, only the District Attorney or designee should act as the Enforcing Attorney.

For a more detailed discussion regarding the primary roles and responsibilities, the City of Garden Grove Water Quality Ordinance (**Section A-4**), Enforcement Consistency Guide (**DAMP Section 4.0, Exhibit 4.I**), and/or the Model Investigative Guidance Manual (**DAMP Section 10, Exhibit 10.I**) should be referenced.

Although the City is responsible for responding to water pollution complaints and incidents within its jurisdiction, the City of Garden Grove has available resources to implement the spill response and Ordinance enforcement portions of the stormwater program. The City provides 24-hour in-house response to Ordinance violations and spill incidents.

A-10.2.3 Detection and Elimination of Illegal Discharges

The City of has a number of programs that facilitate the proactive detection of sources of illegal discharges and illicit connections. These programs include the following:

SECTION A-10, ILLEGAL DISCHARGES/ILLICIT CONNECTIONS

- Municipal Activities (**DAMP Section A-5**) – field inspectors and facility managers assist in the identification of illegal discharges and illicit connections during their daily activities. For example, during the routine maintenance of a drainage facility, a field inspector will report any dumped materials and/or undocumented connections to the NPDES representative.
- Public Education (**DAMP Section A-6**) – assists with the distribution of public education materials that provide phone numbers and encourage the reporting of spills.
- Construction Activities (**DAMP Section A-8**) - assists with the identification of illegal discharges from construction sites.
- Existing Development Programs (**DAMP Section A-9**) – assists with the identification of actual or threatened illegal discharges from industrial, commercial and residential areas.
- Water Quality Monitoring Program (**DAMP Section A-11**) – assists with the identification of problem areas through the collection of water quality data.
- Active participation in the Orange County Hazardous Materials Strike Force.
- Encourage the public to report water pollution problems to the countywide problem reporting hotline at 1-877-89SPILL.

A-10.2.4 Model Spill Response Procedures

In addition to the proactive detection and elimination of threatened or occurring discharges, a large portion of the City of ID/IC Program is responding to water pollution complaints and incidents.

While all spills to municipal storm drain system are important and responses are often the same, sewage spills have merited special regulatory attention as coordination with other public agencies as well as private owners is often involved; for this reason sewage spill response procedures are covered separately in **Section A-10.2.5**.

The response procedures consist of the following elements:

- Record Keeping
- Notifications and Response Requests
- Response
- Investigations
- Clean-Up
 - Trauma Scene Cleanup
 - Cleanup Costs
 - Follow-up
 - Decontamination

- Waste Storage and Disposal
- Reporting
- Education and Enforcement
- Program Effectiveness Evaluation

The Investigative Guidance Manual (Manual) (**Exhibit 10.I**) was developed for the Authorized Inspectors to specifically address the investigative portion of an ID/IC response. The Manual outlines the fundamental techniques that should be followed during investigations in order to collect legally defensible data. The Manual addresses record keeping, site entry, interviewing, photographs, sample collection, and report writing.

A-10.2.4.1 Record Keeping

To ensure that the necessary information from a complaint, notification, or response request is accurately documented throughout the entire process, the City of Garden Grove has available for use a form similar to the County's Pollution Notification and Investigation Request (PNIR) form (**Exhibit A-10.I**)

This form collects information on the:

- Initial notification/response request;
- The location and specific details about the complaint or spill;
- Information about the alleged responsible party;
- The results of the investigation; and
- The actions that were taken as a result.

Documentation may also include photographs, the collection of samples, detailed notes on observations, witness interviews, discussions on decisions made and other information relevant to the investigation.

After the initial entry of the information on the PNIR or related form, the information is entered into a database so that the data can be analyzed and future enforcement activities focused on either problematic responsible parties, locations or constituents. In addition, the use of the database allows the city to quickly and accurately provide the information that is necessary for the annual progress reports.

A-10.2.4.2 Notifications and Response Requests

In order to have a successful ID/IC program, the City of needs to obtain information about potential or existing complaints and spills as soon as possible so that the problem can be mitigated as quickly as possible.

In order to facilitate the reporting of problems by the general public, the city advertises the County's 24 hour water pollution problem reporting hotline number (1-877-89-SPILL), the

website reporting form (www.ocwatersheds.com) and the city reporting number **(714) 741-5956 or (714) 741-5375** on all of the public education brochures and posters.

The County's 24 hour hotline number and web address are included in all Pacific Bell Regional Phone Directories. The hotline number is located in the Government Section of the White Pages while the web address can be found in the Internet Section of the Yellow Pages.

The city also coordinates with internal staff and other agency and emergency response personnel so that they understand how to identify a problem and who to report it to.

A-10.2.4.3 Response

After receiving a notification of a water pollution problem or spill, City of Garden Grove either refers the problem to their internal Authorized Inspector and/or Spill Responder. Each complaint or spill is investigated as soon as possible and according to **DAMP Section 10** to ensure that valuable information is not lost and to minimize any potential human health and environmental impact.

The response typically consists of:

- On-Scene Assessment;
- Notification to necessary departments or agencies as necessary; and
- Containment as necessary.

After conducting an on-scene assessment, several notifications may be necessary.

Notifications may include:

- Notification to Other Agencies – Notifications need to be made to any agencies or entities that may be affected by or have jurisdiction over the pollutant or discharge.
- Requesting Assistance – If it is determined that the incident requires a multi-agency response, it may be necessary to request additional assistance from the other agencies.

The Agency Notification List is included in **Exhibit A-10.I**.

A-10.2.4.4 Investigations

The City of Garden Grove's Inspector or Responder will try to determine why the incident occurred and whether the discharge or release was deliberate or accidental and if the incident is a repeat occurrence and carefully document the investigation to ensure that accurate information is obtained and all evidentiary requirements are met. The types of equipment, supplies and forms that may be used in the field during the investigations are listed in **Exhibit A-10.I**.

The investigation may include collection of samples, photographic documentation, interviews and/or an incident report, per **DAMP Section 10.2.4.5**.

The *Investigative Guidance Manual* (Manual) (**DAMP Section 10 Exhibit 10.I**) was developed for the Authorized Inspectors to specifically address the investigative portion of an ID/IC response. The Manual outlines the fundamental techniques that should be followed during investigations in order to collect legally defensible data. The Manual addresses record keeping, site entry, interviewing, photographs, sample collection, and report writing.

A-10.2.4.5 Clean-Up

The main objective in the clean-up operation is to restore the impacted area back to its original state (to the maximum extent practicable) and prevent further environmental degradation in the surrounding area of the incident. It is important that the clean-up is completed in a timely and cost-effective manner.

During this phase of the response, the Inspector or Responder is generally overseeing and directing the cleanup and should re-evaluate the resources necessary to perform the clean-up and ensure that they are being prepared and sent to the site. The general responsibilities are:

- Provide list of clean-up companies for the RP to contact (**Exhibit A-10.I**);
- Oversee clean-up – Provide clean-up directions and verify pollutant removal;
- Document clean-up company's activities (proper and safe procedures) to verify appropriate clean-up charges; and
- Document amount of waste or pollutant removed to verify disposal costs.

The Authorized Inspector may also deliver to the owner or occupant of any property, or any other Person who becomes subject to an Administrative Remedy such as a Notice of Non-compliance or Administrative Order, and Invoice for Costs. The Invoice for Costs is immediately due and payable to the City of for the actual costs incurred by the City in responding to, overseeing the clean up of and issuing and enforcing any notice or order.

A-10.2.4.5.1 Trauma Scene Clean-Up

Trauma scene wastes (i.e. blood and human tissue) may be encountered at various incidents including crime and/or accident scenes. Since trauma scene wastes require the implementation of special procedures in addition to the general clean up procedures that are followed, the City implements the procedures that are outlined in **DAMP Section 10.2.4.6**.

A-10.2.4.6 Reporting

The ID/IC program has a number of reporting requirements. The requirements include:

- Proposition 65 Notification – Health and Safety Code 25180.7 provides that:

“Any designated government employee who obtains information in the course of his official duties revealing the illegal discharge or threatened illegal discharge of a

hazardous waste within the geographical area of his jurisdiction, and who knows that such discharge or threatened discharge is likely to cause substantial injury to public health or safety, must, within 72 hours, disclose such information to the local health officer."

The Proposition 65 Hotline telephone number is (714) 433-6401; fax number is (714) 754-1768.

- Regional Board Notifications – If a spill, leak or illegal dumping is determined to pose a threat to human or environmental health the Permittees provide oral notification to the Regional Board by phone or e-mail within 24 hours of the discovery followed by a written report within 5 days.

At a minimum the items that are reported include:

- All sewage spills above 1,000 gallons;
- All reportable quantities of hazardous waste spills per 40 CFR 117 and 302;
- Oil spills that may impact wild life; and
- Hazardous substance spills where residents are evacuated.

The oral notifications are submitted within 24 hours to:

- Mark Smythe
Santa Ana Regional Water Quality Control Board
Telephone: (951) 782-4998
E-Mail: msmythe@waterboards.ca.gov
- The key pieces of information that are included with the oral notification include:
 - a) The date and time of the incident;
 - b) Reporting party contact information;
 - c) A description of the incident;
 - d) The location;
 - e) Alleged responsible party contact information; and
 - f) Status on actions taken.

The written reports are submitted within 5 days to:

- Mark Smythe
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501

In order to comply with this requirement, a completed PNIR or similar form is submitted to the Board.

A-10.2.5 Model Sewage Spill Response Procedures

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While all spills to the municipal storm drain system are important and responses are often the same, sewage spills have merited special regulatory attention as coordination with other public agencies as well as private owners is often involved.

While the protocols used in responding to any type of spill are essentially the same, in compliance with Order No. R8-2002-014, the City of has developed and submitted an Overflow Emergency Response Plan to ensure that sanitary sewer overflows are responded to in a timely and efficient manner.

The city will utilize this Plan when responding to sewage spills.

While the protocols used in responding to any type of spill are essentially the same, the specific differences for sewage spills are described within this section.

The primary response procedures for sewage spills are the same as for other types of spills and consist of the following elements:

- Record Keeping;
- Notifications and Response Requests;
- Response;
- Investigations;
- Clean-Up; and
- Reporting.

The current City Ordinance requires that private sewer laterals and septic systems be designed and operated in accordance with industry standards. The Ordinance also requires the proper maintenance of these facilities in order to minimize possible spills, breakages, and failures. The City will enforce these requirements if a spill from private property or source is, or cannot be, effectively remedied by the owner or other responsible party.

A-10.2.5.1 Record Keeping

To ensure that the necessary information is collected, the *City of Garden Grove* uses forms similar to the County's Pollution Notification and Investigation Request (PNIR) form (**Exhibit A-10.I**).

In addition to the information that is collected on the PNIR form, the following pieces of information are collected when documenting a sewage spill:

- Information regarding whether a sewage spill entered a storm drain (i.e. where sewage is observed running into a drain, or directly to a receiving water, creek, channel, etc. or there is residual evidence thereof), including the location and name of the receiving water;
- Determination of spill start and stop time; and

- A determination of spill volume

A-10.2.5.2 Response

Although there are instances where the municipal storm drain and sanitary sewage collection systems are under the same public agency (City) ownership, there are also many situations where the jurisdictions are not the same. Responding to overflows that reach the municipal storm drain system is, in these instances, a joint or shared responsibility of both (stormwater and waste water) Permittees.

The Garden Grove Sanitary District currently has jurisdiction within the *City of Garden Grove's* service area and is responsible for preventive and corrective sewer maintenance programs. This program consists of procedures and methodologies provided for the operation, maintenance, repair and replacement of sewer mains, manholes, and pump stations. The program provides for routine monitoring, inspection, cleaning, and related maintenance of all components of the municipal sanitary sewer system in order to reduce the potential of sanitary sewer overflows (SSOs) and structural failures.

Regardless of where the spill originates, if the spill has entered or may enter the storm drain system the Permittees respond to assist with the cleanup and remediation of the area.

If not already completed upon arriving on scene, the discharge or release of sewage should be discontinued and contained as close to the originating site as possible after the initial assessment has been completed. This is critical in preventing further contamination or degradation downstream and will ultimately result in an easier and less expensive cleanup effort.

The order of preference for the containment is:

- On-site at the point of origination;
- In the curb/gutter or street;
- In the catch basin;
- In the storm drain system; and
- In the channels/ streams.

A-10.2.5.3 Clean-Up

The main objective in the clean-up operation is to restore the impacted area back to its original state (to the maximum extent practicable) and prevent further environmental degradation in the surrounding area of the incident. During this phase of the response, the Inspector or Responder is generally overseeing and directing the cleanup and should re-evaluate the resources necessary to perform the clean-up and ensure that they are being prepared and sent to the site.

The *City of Garden Grove* will ensure that the general clean-up responsibilities outlined in **DAMP Section 10.2.5.4** are followed by the Inspector or Responder overseeing the clean-up.

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A-10.2.5.4 Reporting

Sewage spill reporting to various regulatory agencies has parallel and overlapping requirements. However, reporting spills to one regulatory agency will not necessarily satisfy the requirements of the other. Therefore, the City of reports to the following agencies:

Storm Drain Discharges

- Regional Board Notifications – If a spill, leak or illegal dumping is determined to pose a threat to human or environmental health the Permittees report this information to the Regional Boards by phone or e-mail within 24 hours of the discovery followed by a written report within 5 days. (See Section A-10.5.6 above). At a minimum, the Regional Board shall be notified of all sewage spills above 1,000 gallons.

Sewage Discharger Notifications

- Orange County Health Care Agency (HCA) - California Health and Safety Code Section 5411.5 requires that all sewage spills be immediately reported to the HCA 24-hours a day. During standard work hours (M-F, 8:00 a.m. to 5:00 p.m.) sewage spills that may impact beaches or the ocean should be called in by phone directly to Regulatory Health Services, Environmental Health, Ocean Water Protection Program staff personnel at (714) 433-6000. After hours reports for emergency spills can be phoned in through the County Communications number (714) 628-7008.
- State Office of Emergency Services (OES) - California Water Code Section 13271 and the CCR Section 2250 require that the State OES be notified immediately of all sewage spills of 1,000 gallons or more from public sewer systems by telephone (800) 852-7550.
- Santa Ana Regional Board - Order No. 2002-0014 requires that sewage dischargers immediately report all SSOs entering a storm drain, drainage channel, or surface water body to the Board by telephone, voice mail, e-mail, or FAX. Completed SSO Report Forms, or equivalent, for each and every overflow event must be submitted within five days of the initial notice. Full reports for each SSO occurrence including photos and mitigation measures must be submitted electronically to the RWQCB at the end of each month. Submittal of SSO Summary Reports and certification statements are also required 30 days following the spill report period.
- San Diego Regional Board - Order No. 96-50 requires that sewage dischargers report spills of at least 1,000 gallons, or to surface waters (all, of any volume), within 24-hours by FAX or telephone. In all instances the discharger must fax a SSO Report Form to the Board within five days of the spill. The completed SSO Form must also be faxed to the Department of Health Services (DHS). A quarterly report of all sanitary sewer spills, including those not meeting the criteria stated above, must be submitted electronically to the Regional Board.

A-10.2.5.5 Sewage Spill Response Planning

The City of Garden Grove also participates in the Countywide Area Spill Control (CASC) Program as described **DAMP Section 10.2.5.6**.

The City of Garden Grove and Garden Grove Sanitary District maintain a cooperative partnership and a shared commitment to water quality protection. Measures implemented by the City that relate to sewage spills/incidents include:

- Reporting sewer spills to the Garden Grove Sanitary District
- Containing spills onsite when feasible
- Maintaining working relationships with Garden Grove Sanitary District
- Cross training staff in ID/IC reporting
- Maintaining documentation, report tracking and data management
- Conducting follow up investigations
- Enforcing all applicable adopted codes, ordinances and regulations

*The Garden Grove Sanitary District is currently reviewing spill response procedures and any updates to the protocol will be reflected in the current LIP. A matrix of spill notification protocol is included as an attachment.

A-10.2.6 Illicit Connection Investigations

As part of the municipal stormwater program, the City of detects and eliminates illicit connections within its municipal storm drain system.

Any illicit connection identified by the City of during routine inspections is investigated. Appropriate actions are then taken to approve undocumented connections by permit procedure and/or pursue removal of those connections that are determined to be illicit connections and not permissible.

If evidence of an illegal discharge is detected and the source does not appear to be evident, a source investigation may be conducted as described in **Section A-10.2.7** and **DAMP Section 10.2.7** to determine if the discharge is being conveyed through an illicit connection.

A-10.2.7 Source Investigations

Source investigations may be conducted when an ID/IC is detected or suspected, and the source is not readily identifiable. The purpose of the investigation is to locate the source so that measures to eliminate the ID/IC can be implemented. Source investigations will be initiated when appropriate information suggests evidence of an ID/IC, including:

- Reports made by City staff, government agencies, or the general public
- Triggers established by the data from the water quality monitoring program

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- Professional judgment of water quality monitoring personnel

In order to facilitate the determination of when source investigation studies are warranted, the Dry Weather Monitoring Program (**DAMP Section 11.0**) includes a set of criteria that will trigger focused ID/IC studies by the City when the monitoring data indicate the presence of a problem.

When data from the routine Dry Weather Monitoring Program exceeds these criteria, this triggers a consideration that follow-up investigations are necessary. With this trigger, the County Dry Weather Monitoring Program will have identified a stormdrain that exceeded the criteria, and the City will be notified that a follow-up ID/IC investigation may be necessary. For extreme conditions that represent a clear and immediate risk to human health or receiving water quality then the appropriate Inspector will be notified immediately. This situation may require a hazardous materials response.

In instances, where the monitored site is near a jurisdictional boundary and the upstream drainage network for the site extends into a neighboring jurisdiction(s), all appropriate jurisdictions will be notified.

A-10.2.7.1 Tracking a Pollutant Upstream

Once the City Authorized Inspector is notified of the potential problem and it is determined that a source investigation is warranted, the approach used for tracking a pollutant source upstream or identifying an illicit connection will primarily involve the steps as outlined in the **DAMP Section 10.2.7** including:

- Step One - Initial Screening
- Step Two - Source Evaluations and Inspections
- Step Three - Monitoring
- Step Four - Document, Notify and Report

A-10.2.7.2 Documentation

Thorough and accurate documentation will be maintained by the Authorized Inspector throughout the investigation process to ensure that an accurate record is maintained and legal/evidentiary requirements are met. Documentation is also intended to ensure that the required regulatory reporting is completed, enforcement and cost recovery actions can be justified, repeat offenders and other areas of concern can be identified, program improvements can be made, and program effectiveness assessments can be prepared.

Investigative documentation includes:

Initial notification or investigation/response request
The location and specific details about the complaint
Information about the alleged responsible party

The results of the investigation
The actions that were taken as a result

Additional documentation may include interviews, photographs, samples, observation notes, and other information relevant to the investigation.

A-10.2.7.3 Elimination of ID/ICs

Depending on the type of ID/IC detected, the City will eliminate any discharge or connection by means of appropriate legal procedures. ID/ICs will be eliminated by contacting the appropriate supervisor who oversees the activities resulting in the discharge and notifying the individual of necessary actions.

The activities necessary will be directed by the . A deadline for correcting the infraction with the required activities will be provided by the . In the event that the determines that the individual responsible for the ID/IC is incapable of performing the actions by the compliance date, or if the individual chooses not to perform the activities, the City may conduct the necessary measures, and charge the resulting costs to the individual.

Follow-up will be conducted to ensure that abatement activities have been successfully and adequately implemented.

A-10.3 Education and Enforcement

A-10.3.1 Introduction

Enforcement activities within the City of are undertaken according to the adopted Water Quality Ordinance and accompanying Enforcement Consistency Guide (**DAMP Exhibit 4.I**). Water pollution cases may be handled administratively or in more serious instances, be prepared for prosecution.

The City of has formally designated the staff responsible for carrying out the enforcement services according to the Enforcement Consistency Guide and updates these designations every year as a part of Program Effectiveness Assessment.

The City of generally utilizes four types of remedies including:

- Educational letters;
- Administrative Remedies - Notices of Noncompliance, Administrative Compliance Orders, Cease and Desist Orders;
- Criminal Remedies – Misdemeanors, Infractions, Issuance of Citations; and
- Other civil or criminal remedies as appropriate

A-10.3.2 Choosing the Type of Enforcement

The Enforcement Consistency Guide provides a framework to the Permittees for selecting the type of enforcement that should be pursued. Some of the factors that influence this decision include the duration and significance of the violation of threat, the cooperativeness and willingness of the responsible party to remedy the conditions, whether the incident is isolated or re-occurring and whether the violation or threat will affect or harm human health or the environment.

In order to be consistent countywide, the City of staff use the Enforcement Options Diagram along with the Enforcement Options Matrix (**Exhibit A-10.II**) to assist them in determining which type of enforcement action should be used for any given incident.

The Enforcement Options Matrix

- Identifies common types of complaints and violations;
- Identifies a range of initial and follow up responses;
- Defines a range of enforcement actions based on the nature and severity of the violations; and
- Designates personnel responsible for administering each of these responses.

Although the discussion below provides some guidelines on the use of various enforcement tools, the Enforcement Consistency Guide is the primary document for the enforcement procedures and processes and is consulted when enforcement options are being considered or appeals of enforcement remedies are initiated.

A-10.3.2.1 Educational Letters

Although the Authorized Inspectors primarily rely on the administrative remedies as discussed below, there are still a few occasions when the City of uses enforcement letters.

These situations may occur when:

- An authorized inspector believes that the water pollution complaint may be valid, but does not have evidence to substantiate it; and/or
- A second party, or resident, hires a contractor who causes an incident. In this case the contractor should receive the administrative remedy and the resident should receive an educational letter.

Exhibit A-10.II provides examples of the type of enforcement letter that the city sends to businesses and residents and includes general language that can be inserted to provide alternative methods of disposal for a particular type of material. Educational brochures, pamphlets, posters, magnets, etc. are included with the letter so that the responsible party has additional information regarding the proper handling/disposal of the materials involved in the complaint (e.g. pool water, concrete, dog waste, etc.).

Examples of the types of educational materials that are distributed include the following:

- | | |
|--|--|
| <input type="checkbox"/> Carpet Cleaners | <input type="checkbox"/> Mobile Car Wash |
| <input type="checkbox"/> Restaurant Cleaning | <input type="checkbox"/> Pool Maintenance |
| <input type="checkbox"/> Automotive Service Center | <input type="checkbox"/> Waste Oil Collection |
| <input type="checkbox"/> Gas Station | <input type="checkbox"/> Pest Control Products |
| <input type="checkbox"/> Horse and Livestock | <input type="checkbox"/> Permitted Lot and Pool Drains |
| <input type="checkbox"/> Dog Waste | <input type="checkbox"/> Car Wash Fundraisers |

A-10.3.2.1 Administrative Remedies

The City of Garden Grove generally utilizes four types of administrative remedies (**Exhibit A-10.II**) including:

- Notices of Non-compliance – This is the least onerous enforcement tool and constitutes a basic request that the RP rectify the condition causing or threatening to cause non-compliance with the Ordinance.

The Notice of Non-compliance may be issued when one or more of the following circumstances exist:

- The violation or threat is not significant and has been short in duration
- The RP is cooperative and has indicated a willingness to remedy the conditions
- The violation or threat is an isolated incident
- The violation or threat does not affect and will not harm human health or the environment

Prior to the issuance of an Administrative Compliance Order or a Cease and Desist Order to a responsible party (RP), the Permittee first issues a Notice of Non-compliance, which states the act or acts constituting the violation and directs that the violation be corrected.

The Notice of Non-compliance should provide the RP with a reasonable time period to correct the violation before further proceedings are brought against the RP. However, a Notice of Non-compliance should not be the first enforcement method used if egregious or unusual circumstances indicate that a stronger enforcement method is appropriate.

- Administrative Compliance Orders – This is an appropriate enforcement tool in the following circumstances:
 - An actual condition of Non-compliance exists, but the condition cannot be remedied within a relatively short period of time

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- The owner of the property or facility operator has indicated willingness to come into compliance by meeting milestones established in a reasonable schedule
- The violation does not pose an immediate threat to human health or the environment
- Cease and Desist Orders – This is appropriate when the immediate action of the RP is necessary to stop an existing discharge, which is occurring in violation of the Ordinance. The cease and desist order may also be appropriately issued as a first step in ordering the removal of nuisance conditions, which threaten to cause an unauthorized discharge of pollutants if exposed to rain or surface water runoff.

The cease and desist order may be issued when one or more of the following circumstances exist:

- The violation or threat is immediate in nature and may require an emergency spill response or immediate nuisance abatement if left unattended;
- The violation or threat exhibits a potential situation that may harm human health or the environment;
- The AI's contacts with the property owner or facility operator indicate that further authority of the City [OC] may need to be demonstrated before remedial action is forthcoming; and,
- The AI's prior Notices of Non-compliance have not obtained a favorable response.
- Other Administrative Procedures or Civil Actions
 - Where the city has issued a local permit, the AI may elect to initiate administrative proceedings to suspend, revoke or modify the permit if the permit terms are violated or if changed conditions occur.
 - In consultation with the Enforcing Attorney, the AI may also consider the use of an injunction or other civil enforcement proceedings

A-10.3.2.2 Criminal Remedies

Criminal enforcement is appropriate when evidence indicates that the responsible party has acted willfully with intent to cause, allow to continue, or conceal a discharge in violation of the Ordinance.

The Permittees generally utilize three types of criminal remedies

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- Issuance of Citation - Where criminal enforcement is indicated, the AI may cause issuance of a citation to the responsible party. The citation shall include:
 - The name and address of the violator
 - The provisions of the Ordinance violated
 - The time and place of required appearance before a magistrate

The responsible party must sign the citation thereby promising to appear. If the cited party refuses to sign the citation, the AI may cause the arrest of the discharger, or may refer the matter to the Enforcing Attorney for issuance of a warrant for arrest.

- Infractions - At the discretion of the Enforcing Attorney, misdemeanor acts may be treated as infractions. Factors that the EA may use in determining whether the misdemeanor is more appropriately treated as an infraction may include:
 - The duration of the violation or threatened violation
 - The compliance history of the person, business or entity
 - The effort made to comply with an established compliance schedule
 - The existence of prior enforcement actions
 - The actual harm to human health or the environment from the violation

An infraction is punishable by a fine of not more than \$100 for a first violation, \$200 for a second violation, and a fine not exceeding \$500 for each additional violation occurring within one year.

- Misdemeanors - Criminal enforcement is appropriate when evidence of non-compliance indicates that the violator of the Ordinance has acted willfully with intent to cause, allow to continue or conceal a discharge in violation of the Ordinance. Included in **Exhibit A-10.II** is the case template that the City of uses when developing a case against a responsible party.

A-10.3.2.3 Administrative Hearings

The ordinance provides for appeals of the Authorized Inspector's decisions to a designated Hearing Officer. The final decisions of Hearing Officers are appeal able to the court with proper jurisdiction under statutory review procedures. For further information on the administrative hearing process, see the Enforcement Consistency Guide.

A-10.4 Training

Education and training of municipal and/or other agency staff is one of the keys to a successful stormwater program. This is especially true with the ID/IC Program because the Permittees will be in the public eye when conducting inspections, investigation efforts and proceeding with enforcement actions. To assist the City of municipal and/or other agency staff in understanding the ID/IC Program, several different annual training sessions have been or are being developed (**DAMP Appendix B-10**).

In addition to Permittee sponsored training, staff is also encouraged to attend training seminars or workshops related to stormwater management and water quality conducted by other organizations. Required training for municipal employees is included in **Table A-3.2** of this LIP.

A-10.4.1 Training Modules

In order to adequately address the different areas of the Illegal Discharge and Illicit Connection Program element, eight training modules have been developed and are included in **Appendix B-10**. The training modules, described in detail in **DAMP Section 10.4**, include: *Program Management Training- Introductory (Exhibit B-10.I-A)* *Program Management Training - Experienced (Exhibit B-10.I-B)* ; *Authorized Inspector Training - Introductory (Exhibit B-10.II-A)*; *Authorized Inspector Field Implementation (Exhibit B-10.II-B)* ; *Sewage Spill Response Training - Introductory (Exhibit B-10.III-A)* ; *"Hands-On" Sewage Spill Response Training - Experienced (Exhibit B-10.III-B)* ; *Fire Department Activities (Exhibit B-10.IV)*; *Investigative Guidance Manual (Exhibit B-V)*. The modules will be substantially updated in 2010-11 to reflect the requirements of the Fourth Term Permits.

A-10.4.2 Training Records

The City of Garden Grove maintains records of training provided to staff.

Additional Program Implementation Efforts (2009-2010 PEA):

While some of Environmental's program components are available via GIS the illicit connection program has will be integrated into the GIS system as a top priority. Integrating GIS into the IC program will easily identify program 'hot spots' to target for public education and increase inspection frequency.

Increase commercial and industrial facility formal enforcement actions were violations of our NPDES permit have been identified.

A-11.0 WATER QUALITY MONITORING

The Water Quality Monitoring Section 11.0 describes the monitoring and follow-up activity implemented by or on behalf of the City in compliance with the Monitoring and Reporting Program No. R8-2009-0030 (NPDES No. CAS618030). Water quality monitoring may also be conducted or supported by the City in conjunction with BMP evaluations or other special studies.

A-11.1 Monitoring and Follow-up Activity Carried Out by the Principal Permittee

Through the annual cost-share agreement described in Section 2.0, the City participates financially to support the implementation of the following required monitoring programs by the County of Orange as Principal Permittee:

- **Mass emissions monitoring:** Currently the Principal Permittee monitors 11 mass emissions stations to estimate the total mass emissions (range of urban contaminants and loads) from the MS4; assess trends in mass emissions over time; and to determine if the MS4 is contributing to exceedances of water quality objectives or beneficial uses, by comparing results to the California Toxics Rule (CTR), Basin Plan, Ocean Plan and/or other relevant standards. Samples are collected from the first storm event and two more storm events during the rainy season. A minimum of three dry-weather samples are also collected.
- **Estuary/wetlands monitoring:** Currently the Principal Permittee monitors 20 sites in Upper Newport estuary, Talbert Marsh, and Bolsa Chica wetlands areas to determine the effects of storm water and non-storm water runoff associated with increased urbanization on these systems. These monitoring locations include representative areas surrounding channel outfalls and areas away from channel outfalls to enable the determination of storm water and non-storm water effects on sediment chemistry, toxicity, benthic communities, nutrient status, and spatial extent of sediment fate within the estuarine environment.
- **Bacteriological/pathogen monitoring:** This monitoring element uses measurements of a suite of bacterial indicators to identify spatial and temporal patterns of elevated level in order to prioritize problem areas. The permittees currently monitor 9 representative areas along the Orange County coastline and six inland water bodies/channels, for total coliform, fecal coliform, and enterococcus in order to determine the impacts of storm water and non-storm water runoff on loss of beneficial uses to receiving waters.
- **Bioassessment:** Using a “triad” of indicators (bioassessment, chemistry, toxicity), the Permittees currently monitor 12 stations in cooperation with the Southern California Coastal Water Research Project (SCCWRP) in efforts to evaluate the biological index

approach for Southern California and to design a research project for developing an Index of Biological Integrity (IBI) for the region.

- **Reconnaissance:** Using measurements of key pollutants, reconnaissance monitoring identifies potential illegal discharges and illicit connections, based on comparison with historical data and available estimates of background levels.
- **Water Column Toxicity Monitoring:** The current monitoring program analyzes for toxicity to freshwater and marine species on mass emissions samples to determine the impacts of storm water and non-storm water runoff on toxicity of receiving waters.
- **Sediment:** The Principal Permittee monitors sediment toxicity at seven stations in Newport Bay and seven stations along Huntington Harbour/Talbert Marsh areas.
- **Land use correlations:** Using an experimental, “before-after,” design, this monitoring element identifies changes in runoff associated with the urbanization of previously agricultural land.
- **TMDL/303(d) Listed Waterbody Monitoring:** The Permittees participate in the Regional Monitoring Program for the San Diego Creek Nutrient and Toxics TMDLs, and evaluate the impacts of runoff on all impairments within the Newport Bay watershed and other 303(d) listed waterbodies.

For the Mass Emissions Monitoring, Bioassessment and receiving waters monitoring programs described above, associated follow-up special investigations to determine the extent and causes of MS4 discharge contributions to key identified impacts are generally conducted by the County, with City financial or logistic support as needed, as described in the Monitoring and Reporting Program. Follow-up investigation findings are used to inform the prioritization and implementation of City and/or County management actions to reduce/eliminate sources.

A-11.2 Monitoring and Follow-up Activity by the City

The following monitoring and follow-up activities are carried out by the City, with technical assistance from the County as needed:

- **Follow-up Investigations and Enforcement for the Illicit Connection/Illegal Discharge Program:** As described under **Section A-10**, the City may conduct water quality sampling as a component of follow-up investigations and/or enforcement actions to help determine the source(s) of significant pollution identified via hotline reports and dry weather monitoring programs.
- **BMP Effectiveness Evaluation:** As described in **Section A-3.3**, the City may conduct and/or cooperate with water quality sampling to verify whether Best Management Practices proposed or implemented in response to the IC/ID Program or other programs

SECTION A-11, WATER QUALITY MONITORING

are effective in reducing the constituent(s) of concern at a specific problem location, at MS4 outfalls, in receiving waters, or at research site(s); or whether another iteration of BMPs should be considered to make progress toward attaining water quality objectives. The City may also conduct water quality sampling to verify the effectiveness of its Municipal, Existing Development, and Construction BMP programs.

All water quality analyses for the City-run sampling and monitoring programs will be collected and analyzed by professional staff and a commercial laboratory. Monitoring data accumulated under the above programs will be evaluated and reported by the City.

A-11.3 Reporting

Data from the Monitoring and Reporting Program conducted by the Principal Permittee on behalf of the Permittee Cities are assessed by quantitative evaluation of data and analyses of short- and long-term trends as appropriate, and are reported to the RWQCB by the Principal Permittee.