6.0 POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Responsible Person to Implement or Coordinate this Minimum Control Measure: County Public Works Director.

The purpose of this minimum control measure for Municipal Operations/Good Housekeeping Practices is to assure that the County's delivery of public services occurs in a manner protective of storm water quality. In this way the County may serve as a model to the community.

6.1 Minimum Requirements

The State's General Permit states that the County must develop and implement an operations and maintenance plan the will prevent or reduce pollutants in runoff from municipal operations (*EPA Fact Sheet 2.8 – Pollution Prevention/Good Housekeeping, 01/00*).

The minimum requirements are:

- To consider municipal activities and identify those that may contribute pollutants to storm water;
- To select and implement Best Management Practices (BMPs) that will reduce or eliminate pollutants in storm water runoff from these activities to the Maximum Extent Practicable; and
- To train new and existing employees on the potential impacts to storm water from municipal activities and the implementation of BMPs to prevent and reduce these impacts.

6.2 Best Management Practices

The County engages in numerous activities that cover the gamut from road and building maintenance to hiring contractors to construct roads and buildings. To cover all these activities under the SWMP requires flexibility in implementing the BMPs. As discussed below, the County has evaluated the services it provides and the facilities it owns and operates. The BMPs under this MCM include changes to facilities, procedures and training of County staff.

6.2.1 Evaluation of Santa Barbara County Facilities and Operations (Self-Audit)

The County operates many different kinds of facilities over a wide and varied area. In order to address the need for storm water protection for all facilities and operations, every County facility was surveyed and facility managers or operational managers interviewed to determine the nature of activities, identify appropriate BMPs, and provide for their implementation. Each facility or operation was evaluated with respect to operations, activities and existing storm water management practices.

Prior to beginning the surveys, a comprehensive list of all County facilities was developed. Since no one department maintained such a list, several departments were contacted for their database of facilities (both owned and leased). PCW staff surveyed over 250 individual sites that comprise all County-owned or leased sites, ranging from corporate yards to leased youth camps. In addition to making a visual survey of each, PCW staff spoke with facility supervisors and managers regarding operations and activities, and completed a storm water information questionnaire. Undeveloped and un-maintained County-owned or leased sites were not part of the survey program because, by their nature, they have little to no impact storm water quality.

Some County facilities are regulated under an Industrial Storm Water Permit General Permit, issued by the SWRCB under the NPDES Phase I rules that have been in effect since 1992. These facilities are subject to a separate storm water permit as it relates to their particular operation (or Standard Industrial Classification code). These facilities include the Tajiguas landfill, Foxen Canyon landfill, transfer stations, and the Santa Ynez airport. (Information on these facilities and the industrial NPDES program is available from the RWQCB.) One of these Phase I facilities, the South Coast transfer station, is located within the urbanized area and is therefore part of the County's SWMP. Because of the existing industrial permit conditions, the South Coast Transfer station was not included in the County inventory discussed below, however this facility's Storm Water Pollution Prevention Plan will be evaluated to maintain consistency with other municipal facility programs.

For example, the General Industrial Permit requires the facilities listed above to have both a Storm Water Pollution Prevention Plan (SWPPP) and a monitoring plan. Sources of pollutants are identified and the means to manage the sources to reduce storm water pollution are defined in the SWPPP. Under the Phase 1 rules, facilities must implement management measures to achieve the performance standard of best available technology economically achievable (BAT) and best conventional pollutant control technology (BCT). The General Industrial Permit requirements accomplish similar goals of the Storm Water General Permit minimum control measures for municipal operations: identifying activities that may contribute pollutants to storm water, selecting and implementing BMPs and providing for corrective action and dates of implementation, and training employees. The General Industrial Permit also requires analytical storm water monitoring and an annual report.

A questionnaire was developed for the inventory survey to ensure appropriate, detailed and standardized information was collected. In addition, the questionnaire covered current pollution prevention BMPs, permits and inspections, record keeping and reporting methods. During the facility surveys, potential water quality impacts were noted based on activities, materials used, wastes generated, standard operating procedures (SOPs), and storage practices.

It was evident that many County facilities were implementing pollution prevention practices, which also reduce impacts to storm water. Periodic inspections specific to permits were documented. For example, the Flood Control District has a Program EIR for their annual maintenance activities (see Appendix K). Each of the projects within the scope of the Program EIR is presented as addenda to the Program EIR, utilizing appropriate standard maintenance practices for the project impacts. Each of these PEIR projects has a mitigation and monitoring

program attached to the addendum. Once the Board has approved projects defined in the Annual Maintenance Plan, application is made to the State Department of Fish and Game, U.S. Army Corps of Engineers, and other regulatory agencies for environmental permits or approvals. Applicable permits are obtained from local, State and Federal regulatory agencies prior to project implementation. Flood Control projects beyond the scope of the Program EIR require additional environmental documentation with individual hearings to consider these projects. Thus, the Flood Control District works under permits with detailed work plans for their operation and maintenance activities. The County Flood Control District commits to continue their routine creek maintenance program including water quality protection measures as set forth in the associated environmental permits (see Annual Maintenance Plan http://www.countyofsb.org/pwd/water/creek.htm for additional detail).

Over 26 managers of field operations were interviewed. Supervisors and managers who oversee the field operations provided detail on activities conducted off-site that could have potential impacts to storm water. Recommendations for field activity BMPs were developed. Individual field operations and activities were not evaluated by PCW staff since the logistics of scheduling proved very difficult (a lot of the work is seasonal and includes responding to emergencies). Instead, data was gathered by interviewing the supervisors and managers who oversee this work.

Below are the departments interviewed and their field projects and field programs reviewed:

Agricultural Commissioner: Vector Control, Weed Abatement Program, Weights & Measures
Air Pollution Control District: Monitoring stations
Alcohol, Drugs, Mental Health Services (ADMHS): Client contact
Fire: Training exercises, Equipment repair, Fire Prevention Program, Hydrant testing, Emergency response
General Services: Communications, Vehicle Operations, Facilities maintenance
Probation: Graffiti Abatement Program, Home visits, Los Prietos Boys Camp & Tri-Counties Boot Camp, Community Service Program
Public Health: Animal Services, Vector control, Home visits
Public Works: Construction/Lab, Flood Control, Laguna Sanitation, Roads, Traffic, Solid Waste
Sheriff: General, SWAP, Drug labs/Bomb Squad
Social Services: Client contact

The results of the facility surveys were compiled in a spreadsheet, which identified each facility or field operation (by department and division) with its potential to impact storm water. During the surveying a list of municipal activities with the potential to impact storm water was created. The matrix identifies activities and the associated BMPs for each department and facility. This spreadsheet is being transferred to a web-based application so that each department can track and report on their individual accomplishments. This information will be used directly in the annual reports to the RWQCB.

6.2.2 Site Specific Water Quality Protocols

To ensure compliance with the County's SWMP, facilities with a greater potential to create or release pollutants are completing their own site-specific written Water Quality Protocols. Such protocols have been, or will be, developed for the following sites:

General Services: Vehicle Operations
Fire: Construction Yard
Public Works: Flood Control, Roads, Traffic, Corporation Yards, Laguna Sanitation

6.2.3 Municipal Operations Best Management Practices Fact Sheets

A total of 19 Best Management Practices Fact Sheets (Fact Sheets) have been developed and are shown in Appendix H - Best Management Practices Fact Sheets – Municipal Operations. Based on activities identified during interviews and onsite surveying, the Fact Sheets primarily focus on source control (including employee training) to reduce or prevent pollution.

Each Fact Sheet presents a variety of specific BMPs for preventing and reducing pollution covering one activity, such as: housekeeping, landscaping or storm drains. This menu approach allows each department and facility to take credit for their existing pollution prevention efforts (whether written or not) and to select appropriate BMPs to augment their current efforts. In addition, all County employees are encouraged to suggest new BMPs; PCW will either add these suggestions to the Countywide Fact Sheets or recommend that they be used as site- or operation-specific BMPs only. In this way the Fact Sheets can be continuously updated to ensure the best menu of BMPs are available.

The BMP Fact Sheets include:

SC1. Alternative Safer Products
SC2. Building Maintenance & Repairs
SC3. Employee Training
SC4. Housekeeping (addresses cleaning practices conducted by County employees and their contractors)
SC5. Kitchen, Restaurant & Deli
SC6. Landscape & Undeveloped Areas
SC7. Loading & Unloading
SC8. Material & Hazardous Waste Storage
SC9. Metal, Wood, Paint & Print Shops
SC10. Parking Lots & Garages
SC11. Spill Prevention & Cleanup
SC12. Storm Drains & Catch Basins
SC13. Horses
SC14. Trash & Dumpster Management
SC15. Vehicle & Equipment Fueling
SC16. Vehicle & Equipment Maintenance & Repairs
SC17. Vehicle & Equipment Washing and Steam Cleaning
SC18. Basic BMPs for Employees
TC1. Treatment (Structural) Controls

While the surveys and interviews showed that source control BMPs are generally the best approach to reduce pollution, on occasion treatment controls are needed in some circumstances to protect storm water. Since site-specific conditions and project requirements are highly variable, a reference list was developed in lieu of County-specific treatment control BMPs. The TC1 Fact Sheet references several well-known handbooks chosen for their expertise in handling storm water runoff under the wide variety of conditions found in California. These are the same references given in the Construction Storm Water Program under the County's Planning and Development Department. The references are:

- California Department of Transportation. *Storm Water Quality Handbook: Construction Site Best management Practices (BMPs) Manual*. 2002 or current.
- California Regional Water Quality Board San Francisco Bay Region. *Erosion and Sediment Control Field Manual.* 2002 or current.
- California Stormwater Quality Task Force. *California Storm Water Best Management Practices Handbooks: Construction Activity; Industrial/Commercial Activity; New Development and Redevelopment; and Municipal Activity*. Four volumes, January 2003 or current.

6.2.4 Reporting on BMP Implementation

PCW staff are developing an interactive web-based program that will enable those staff responsible for facilities and operations to report on their individual storm water program, including BMPs selected and a schedule for BMP implementation and reporting.

Results of this program will be used for updating and revising the BMPs and for annual reporting to the RWQCB under the NPDES permit. PCW staff will also evaluate relevant program activities implemented by other Phase I and Phase II communities, including but not limited to Los Angeles and San Diego Counties, and revise the County-wide BMPs (as shown on the Fact Sheets) as appropriate.

6.2.5 Purchasing and Contracts

The County is reviewing policy language requiring vendors and contractors who provide services for the County to implement storm water BMPs relevant to its work. Such services and contracts may include housekeeping, painting, and construction. Contracts will be worded to include specific language requiring contractors to obtain approval from the County for project-oriented BMPs. The contractor's BMPs or plan will describe how storm water conveyances will be protected from potential pollutants specific to the project undertaken. If the contractor violates the plan, it will be sufficient reason for termination of the contract without harm to the County. Current contract language used by General Services Purchasing incorporates by reference the current edition of the Standard Specifications for Public Works Construction ("Green Book").

The Public Works Department, which is a major contractor for construction activities, incorporates Caltrans Standard Specifications or in the case of Flood Control District, the California Storm Water Quality Association's Construction BMP Handbook, into all contract documents. These specifications include strict provisions for the protection of water quality. Specifically, Water Pollution Control Programs are required on all construction projects with soil

disturbance of less than 1 acre and Storm Water Pollution Prevention Plans are required on all projects greater than1 acre. These plans must include BMPs to address erosion and sediment control measures, as well as non-storm water runoff control measures.

6.2.6 Green Team and the Countywide Integrated Pest Management Plan

The County of Santa Barbara's Green Team was developed in l999 to promote environmental stewardship in County operations. In June 1999 the County Green Team was asked to initiate a process by which the County could assess its pesticide use. A Pesticide Subcommittee was formed with representatives from the Public Works Department, the General Services Department, the Parks Department, and the Agricultural Commissioner's Office. Representatives from these County Departments developed an *Integrated Pest Management Strategy* (Appendix I - Integrated Pest Management Strategy and Integrated Pest Management Plan) in support of the goal of reducing the potential impact of pesticide use on the community.

The Integrated Pest Management (IPM) Strategy promotes the design, construction and maintenance of County landscapes and structures in a way that protects and enhances the region’s natural resources and public health. In addition, the IPM Strategy provides a framework for evaluating pesticide use by County Departments.

The purpose of the IPM Strategy is to ensure that County application of pesticides is done in a manner that protects and enhances the region’s natural resources and public health; that County use of pesticides is a model of environmental stewardship in the eyes of the public; that the County establishes a leadership role in developing both aesthetically pleasing and ecologically sensitive landscapes and structures; and that there is a consistent standard of environmental stewardship observed by County departments managing structures, landscapes, and other grounds.

The IPM Strategy also provides for periodic re-evaluation of pesticides used by County employees, to phase out products that pose human health or environmental risks, and to promote the use of non-hazardous and/or reduced-risk alternatives by the County that are protective of human health and the environment. The IPM Strategy requires updates that list the pesticides in use by all County departments and allows employees involved in pesticide use to make conscious decisions about the pesticides selected, to use pesticides wisely, and to make full use of pesticides purchased. Each department was required to appoint an IPM Coordinator to oversee pilot projects that implement IPM techniques.

As part of the IPM Strategy, a Grounds Management Committee was established to coordinate activities, exchange information, review requests for new products, set goals and evaluate progress.

The IPM Strategy was prepared in a manner that allows the document to be updated and improved as-needed. In addition, several future actions were set forth with the input from Board members and public interest groups to encourage future enhancements to the program. To date, no revisions to the IPM have been made.

Public notification procedures were developed and are implemented by General Services Department and Parks Department. Although their pesticide use has much lower exposure to the public, Flood Control also provides notification whenever pesticides are applied.

The County's Board of Supervisors approved the IPM Strategy and Plan in April 2000. The most recent status report was presented to the Board of Supervisors on October 23, 2007. For current updates on the County's Integrated Pest Management Plan strategy, see www.countyofsb.org/greenteam.

As described in the preceding paragraphs, the County's IPM strategy directs all County Departments to find effective alternatives to the use of pesticides that could be harmful. However, it should be noted that the use of pesticides in California is subject to state and federal rules, and misuse of any pesticide is a violation of these laws. California has additional controls on certain pesticides that could be especially hazardous to human health or the environment if they are used improperly. County programs that involve pesticides use must use certified applicators or trained persons working under their supervision in order to use regulated pesticides, defined as "restricted materials" (California Code of Regulations, Title 3, Division 6, Section 6400 et seq.). In addition to the permitting requirements enforced by the Department of Pesticide Regulation, the SWRCB also regulates and enforced pesticide use where there is discharge to surface waters. On May 20, 2004, the SWRCB adopted two General Permits regulating the use and application of pesticides under a National Pollutant Discharge Elimination System (NPDES) permit. They are:

1. Water Quality Order No. 2004-0008-DWQ Statewide General NPDES Permit for Discharges of Aquatic Pesticides to Surface Waters of the United States For Vector Control (General Permit No. CAG990004); and
2. Water Quality Order No. 2004-0009-DWQ Statewide General NPDES Permit for the Discharge of Aquatic Pesticides for Aquatic Weed Control in Waters of the United States (General Permit No. CAG 990005).

Water Quality Order No. 2004-0009-DWQ specifically addresses the discharge of aquatic pesticides related to the application of 2,4-D, acrolein, copper, diquat, endothall, fluridone, glyphosate, and triclopyr-based aquatic pesticides to surface waters for the control of aquatic weeds. Water Quality Order No. 2004-0008 requires that dischargers implement BMPs to mitigate effects to water quality resulting from pesticide applications and consider alternative control measures to reduce potential water quality impacts. County staff and programs that use the pesticides regulated under these Orders must comply with the conditions of the General Permits.

6.2.7 Solid Waste Handling and Recycling

The County Resource Recovery and Waste Management Division is responsible for the management of solid waste in the County and provides landfill disposal for the unincorporated areas of the south coast of Santa Barbara County, the City of Santa Barbara, Santa Ynez Valley, and the Cuyama Valley. The County's job is to provide environmentally safe solutions for the collection and disposal of Santa Barbara County's trash.

The Division's comprehensive program for the management of solid waste includes the collection, recycling, and disposal of solid waste, and also the abatement of illegal dumping of waste (see Illicit Discharge Detection & Elimination MCM). These programs are established and regulated under separate state and federal regulations than the Phase II program mandating this SWMP. Discussion of County Resource Recovery and Waste Management Division programs in this SWMP is for informational purposes and does not subject them to additional regulation.

Programs implemented by the County to prevent improper disposal of wastes into the environment include:

- Backyard Composting
- Business Recycling Program
- California Coastal Cleanup Day
- Christmas Tree Recycling
- Construction & Demolition Debris Recycling
- Electronics Recycling Program
- Green Award Program
- Household Hazardous Waste
- Illegal Dumping/Abandoned Vehicle Program
- Junk Mail Recycling
- Multi-Family Residential Recycling
- Recycling Market Development Zone
- Recycling Resource Guide
- School Recycling
- Single- Family Residential
- Recycling
- South coast solid Waste and recycling facility (4430 Calle Real)
- Telephone Book Recycling
- Food Scrap Recycling Program

Through the County of Santa Barbara's Household Hazardous Waste Program, the community has several avenues to safely dispose of household hazardous waste. Education of the public about the proper disposal of household hazardous waste occurs through fliers, community events, and radio and newspaper advertisements.

The County of Santa Barbara has been awarded the Household Hazardous Waste/Used Oil Program, Program Excellence Award by the California Environmental Protection Agency (Cal/EPA) for the calendar year 2001. Cal/EPA's Household Hazardous Waste/Used Oil Program awards are intended to promote and recognize local programs engaged in pollution prevention, hazardous waste reduction, waste stream toxicity reduction, and recycling.

The Household Hazardous Waste Program encompasses the following programs and partners:

- Permanent collection facility known as the Community Hazardous Waste Collection Center (CHWCC) located on the campus of the University of California at Santa Barbara;
- North Santa Barbara County curbside used oil collection program operated by a waste hauler, Health Sanitation Service;
- The Foxen Canyon Landfill Antifreeze, Batteries, Oil, and Paint (ABOP) facility in the Santa Ynez Valley;
- Annual one-day Household Hazardous Waste collection events in the Santa Ynez and Cuyama Valleys;
- Home Generated Sharps Collection Program for the collection and proper disposal of used needles; and
- Comprehensive used oil and household hazardous waste collection program operated by the County and located on the UCSB campus in cooperation with the University of California at Santa Barbara.

No measurable goals are needed since this is an ongoing and separately mandated program with its own independent reporting requirements. Information on this program may be obtained from the County Resource Recovery and Waste Management Division.

6.2.8 Storm Drain Maintenance

The County currently owns and maintains several storm water treatment control facilities, including seven CDS units located in the public right of way, one CDS unit located on County property below the South County Transfer Station, three bioswales, and one ultraviolet radiation treatment system, all of which were installed as pilot projects to evaluate cost-effectiveness. Several drop inlet filters were installed on a pilot-scale basis, but were removed due to maintenance difficulties and constraints. Four of the CDS units and the UV treatment system are located in Isla Vista and treat runoff prior to discharge onto the beach. The remaining three units and three bioswales are located in the unincorporated Goleta area and treat runoff prior to discharge into Atascadero Creek. Maintenance consists of regular inspections, removal of wastes from the CDS units as needed, minor landscaping management efforts at the bioswales on as-needed basis, and vector control/treatment as-needed. The County will continue to perform regular cleaning and maintenance of these facilities, and will establish a regular inspection and

maintenance schedule to ensure that facilities are cleaned prior to the rainy season and at other appropriate times of the year.

6.2.9 Street Sweeping

The County sweeps commercial district and heavily-used arterial streets a minimum of three times per year, prior to storms likely to mobilize accumulated materials into the storm-drain system. Field observations indicate a minimum of four to six weeks after significant rainfall is long enough to accumulate material in the gutter of these streets to make street sweeping worthwhile. The County typically sweeps approximately 24 lane-miles each event in the areas of Orcutt, unincorporated Goleta, Montecito, and Summerland; both volume and weight of materials collected are recorded prior to disposal. Local disposal through the County's Resource Recovery and Waste Management Division program is a necessary element of this BMP to maintain control of the waste stream, disposal location and cost. The County will continue to sweep the currently targeted streets three times per year prior to storms likely to mobilize accumulated materials into the storm-drain system. The County will monitor and report both volume and weight of material collected.

6.2.10 Training

County employees will receive an appropriate level of outreach or training on storm water pollution prevention based on their work responsibilities. Much of the training programs will be integrated into existing training presented to staff. Departments are encouraged to incorporate storm water training into their routine classes. The surveys indicated that most departments have some type of training or handout to educate their employees on the specific hazards of their job, so storm water issues may be incorporated into current training.

An outreach campaign will be developed countywide based upon the BMP Fact Sheet entitled "Basic BMPs for County-Wide Employees." This Fact Sheet provides general direction to all County employees through new employee orientation to protect water quality both at work and at home. This Fact Sheet emphasizes that even small actions can impact storm water for benefit or cost; employees have a choice in their everyday activities. At work they are asked to report these to either their Department or the PCW team via an 800 number. They are also given web sites that provide alternatives practices to prevent pollution at home.

Depending on personnel involved, storm water outreach / training will occur either quarterly or annually. In addition, managers will be given specific guidance on their departmental and contractual responsibilities for storm water management, while facilities with Water Quality Protocols may have very specific training requirements as directed in the protocol. Frequency and type of training will depend on the activities targeted.

The Public Health Department, Environmental Health inspectors, and the Fire Department CUPA inspectors (Business Plans, Cal-ARP, etc.) will receive training targeted toward their existing inspection and enforcement programs that address health and safety concerns. Preventing water pollution is integral to these existing inspection programs. Inspectors will be trained to look for potential water pollution problems in the context of this Storm Water Management Program and to understand appropriate BMPs for prevention. Training will occur

on ongoing basis in conjunction with other training opportunities provided these staff. Other departments such as Public Works, General Services, and Parks will be targeted for their ongoing work in context of work performed in roadways, storm drains, and creeks. Annual reports will identify number of staff that attended and provide an outline of the training program and description of the effectiveness.

6.3 Measurable Goals

The following measurable goals (MGs) will be used to check BMP progress each year as well as demonstrate the efforts made to reduce pollutants to the maximum extent practicable. The intent is to provide an opportunity to assess and evaluate the program and provide a feedback mechanism to measure and update the program as appropriate.

Table 6-1
BMP Implementation: Pollution Prevention and Good Housekeeping for Municipal Operations

#	BMP	Description	Measurable Goals	Year					Implementing Entity
				1	2	3	4	5	
6.1	Evaluation of Santa Barbara County Facilities (Self-Audit)	Project Clean Water staff has completed onsite evaluations of County facilities and surveyed County activities with respect to storm water and non-storm water discharges.	**MG 6.1.1** Survey facilities to determine nature of activities and appropriate BMPs.						County - PCW
6.2	Site Specific Water Quality Protocols	Develop protocols for sites with activities such as vehicle operations, construction yards, corporation yards, and sanitary treatment facilities.	**MG 6.2.1** Complete 100% of facility-specific protocols by Year 3.			X			County – PCW, Public Works, Parks, General Services
6.3	Municipal Operations Best Management Practices Fact Sheets	Based upon the facility and activity surveys, a list of appropriate BMPs for various operations has been developed.	**MG 6.3.1** Prepare and publish BMP Fact Sheets.						County - PCW

#	BMP	Description	Measurable Goals	Year					Implementing Entity
				1	2	3	4	5	
6.4	BMP Fact Sheet Implementation & Reporting	Staff will utilize web-based program to report BMP implementation or implementation schedule.	**MG 6.4.1** Update and revise BMP Fact Sheets as necessary based upon staff input; revise or add based upon BMPs from other Phase I and Phase II municipalities as appropriate.	X	X	X	X	X	County - PCW, RRWMD, Public Health Regional Partners
			MG 6.4.2 Develop an interactive web-based program for departmental reporting on BMP implementation as listed in the Fact Sheets, including BMPs selected, performance measures, or a schedule for BMP implementation and reporting.						
			MG 6.4.3 Tabulate number of BMPs implemented and report annually based on the following schedule: Achieve 50% implementation by County departments on BMPs by year 2; achieve 75% by Year 3; and achieve 100% by Year 4.	X	X	X	X	X	
			MG 6.4.4 Evaluate the nature, type, and effectiveness of BMPs implemented through a system of PCW internal audits. Perform audits for each department for at least one facility by the end of each reporting year.						
			MG 6.4.5 Continue to implement existing programs and activities that protect water quality (i.e., regulated flood control maintenance and Annual Plan activities; solid and hazardous waste collection, disposal, and recycling programs; maintenance of storm drain treatment control facilities), and include update of these ongoing programs and activities in annual reports.						

#	BMP	Description	Measurable Goals	Year					Implementing Entity
				1	2	3	4	5	
6.5	Purchasing and Contracts		**MG 6.5.1** Complete contract revisions.	X	X	X	X	X	County – PCW Art From Scrap
			MG 6.5.2 Tabulate number of County staff participating in training that addresses clean water BMP implementation through County contracts and purchasing practices.	X	X	X	X	X	
			MG 6.5.3 Evaluate contractor compliance.	X	X	X	X	X	
			MG 6.5.4 Take enforcement action on 100% of projects with BMP failures constructed under contract to the County, such as Notices of Violation, Stop Work Orders, or fines. Report the number of Notice of Violations or Corrective actions.						
6.6	Countywide Integrated Pest Management Plan		**MG 6.6.1** Report pesticide use on a departmental basis and provide updates, if any, to the countywide IPM strategy.	X	X	X	X	X	County - PCW Art From Scrap, WRC
6.7	Storm Drain Maintenance		**MG 6.7.1** Establish and implement a cleaning schedule for County-owned and operated treatment control facilities.	X	X				County - PCW
6.8	Street Sweeping		**MG 6.8.1** Report number of lane-miles swept and number of events per year, at minimum three events per year.	X	X	X	X	X	County Regional Partners
			MG 6.8.2 Report weight and volume of materials collected for each event.	X	X	X	X	X	
6.9	Staff Training		**MG 6.9.1** Achieve 100% completion of countywide training by year 3.	X	X	X	X	X	County – Water Agency Regional Partners
			MG 6.9.2 Document number of training sessions presented.		X	X	X	X	
			MG 6.9.3 Document number of staff attending.		X	X	X	X	
			MG 6.9.4 Document number of email messages on water quality.						

6.4 Reporting

Data collected for each measurable goal will be compiled, reviewed and summarized as part the annual reports to the RWQCB. Significant variance from targets will be assessed and discussed

in the annual reports to the RWQCB. Feedback from County employees, stakeholders, etc. will be used to modify BMPs or the measurable goals, as appropriate; the basis for any changes will be included in the annual report.