

August 27, 2015

Mr. Bruce H. Wolfe, Executive Officer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Ms. Pamela Creedon, Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Dear Mr. Wolfe and Ms. Creedon:

Enclosed is the 2014-2015 Annual Report for the City of Brentwood, which is required by and in accordance with Provision C.16 in National Pollutant Discharge Elimination System (NPDES) Permit Number CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board and/or by Provision C.13 in NPDES Permit Number CA0083313 issued by the Central Valley Regional Water Quality Control Board.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines or imprisonment for knowing violations.

Sincerely,



Jagtar ("Jack") Dhaliwal, P.E.
Development Engineering Manager

jc/km/sb

Enclosure

cc: Gustavo ("Gus") Vina, City Manager
Bailey Grewal, Director of Public Works/City Engineer
Jeff Cowling, Construction Inspector
Kelly Martinez, Safety/Special Projects Coordinator

MAILING ADDRESS:
City Hall
150 City Park Way
Brentwood, CA 94513
Phone: 925-516-5400
Fax: 925-516-5401
www.brentwoodca.gov

CITY ADMINISTRATION
150 City Park Way
Phone: 925-516-5440
Fax: 925-516-5441

COMMUNITY DEVELOPMENT
150 City Park Way
Phone: 925-516-5405
Fax: 925-516-5407

**FINANCE & INFORMATION
SYSTEMS**
150 City Park Way
Phone: 925-516-5460
Fax: 925-516-5401

PARKS AND RECREATION
35 Oak Street
Phone: 925-516-5444
Fax: 925-516-5445

POLICE
9100 Brentwood Boulevard
Phone: 925-634-6911
24 Hr. Dispatch: 925-778-2441
Fax: 925-809-7799

PUBLIC WORKS

Operations Division
2201 Elkins Way
Phone: 925-516-6000
Fax: 925-516-6001

Engineering Division
150 City Park Way
Phone: 925-516-5420
Fax: 925-516-5421

ATTACHMENT B

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Section 1 – Permittee Information

Background Information				
Permittee Name:	City of Brentwood			
Population:	55,000			
NPDES Permit No.:	CA00883313 (Central Valley RWQCB Permit)			
Order Number:	R5-2010-0102 (Central Valley RWQCB Permit)			
Reporting Time Period (month/year):	July 1, 2014 through June 30, 2015			
Name of the Responsible Authority:	Gustavo Vina	Title:	City Manager	
Mailing Address:	150 City Park Way			
City:	Brentwood	Zip Code:	94513	County: Contra Costa
Telephone Number:	(925) 516-5440	Fax Number	(925) 516-5421	
E-mail Address:				
Name of the Designated Stormwater Management Program Contact (if different from above):	Jagtar Dhaliwal	Title:	Assistant Director of Public Works/Engineering	
Department:	Public Works			
Mailing Address:	150 City Park Way			
City:	Brentwood	Zip Code:	94513	County: Contra Costa
Telephone Number:	(925) 516-5128	Fax Number:	(925) 516-5421	
E-mail Address:	jdhaliwal@brentwoodca.gov			

Section 2 - Provision C.2 Reporting Municipal Operations

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Summary:
Participated in Contra Costa Clean Water Program's (CCCWP's) Municipal Operations Committee. Refer to the C.2 Municipal Operations section of the CCCWP's Program's FY 14-15 Annual Report for a description of activities implemented at the countywide and/or regional level.

C.2.a. ► Street and Road Repair and Maintenance

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

Y	Control of debris and waste materials during road and parking lot installation, repaving or repair maintenance activities from polluting stormwater
Y	Control of concrete slurry and wastewater, asphalt, pavement cutting, and other street and road maintenance materials and wastewater from discharging to storm drains from work sites.
Y	Sweeping and/or vacuuming and other dry methods to remove debris, concrete, or sediment residues from work sites upon completion of work.

Comments:

C.2.b. ► Sidewalk/Plaza Maintenance and Pavement Washing

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

Y	Control of wash water from pavement washing, mobile cleaning, pressure wash operations at parking lots, garages, trash areas, gas station fueling areas, and sidewalk and plaza cleaning activities from polluting stormwater
Y	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs

Comments:

C.2.c. ► Bridge and Structure Maintenance and Graffiti Removal

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

Y	Control of discharges from bridge and structural maintenance activities directly over water or into storm drains
Y	Control of discharges from graffiti removal activities
Y	Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities
Y	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs for graffiti removal
Y	Employee training on proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.
N/A	Contract specifications requiring proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.

Comments:

C.2.d. ► Stormwater Pump Stations

Does your municipality own stormwater pump stations: Yes No

If your answer is **No** then skip to **C.2.e.**

Complete the following table for dry weather DO monitoring and inspection data for pump stations¹ (add more rows for additional pump stations). If a pump station is exempt from DO monitoring, explain why it is exempt .

Pump Station Name and Location	First inspection Dry Weather DO Data		Second inspection Dry Weather DO Data	
	Date	mg/L	Date	mg/L

Summarize corrective actions as needed for DO monitoring at or below 3 mg/L. Attach inspection records of additional DO monitoring for corrective actions:

Summary:

 Attachments:

Complete the following table for wet weather inspection data for pump stations (add more rows for additional pump stations):

Pump Station Name and Location	Date (2x/year required)	Presence of Trash (Cubic Yards)	Presence of Odor (Yes or No)	Presence of Color (Yes or No)	Presence of Turbidity (Yes or No)	Presence of Floating Hydrocarbons (Yes or No)

¹ DO monitoring is exempted where all discharge from a pump station remains in a stormwater collection system or infiltrates into a dry creek immediately downstream.

C.2.e. ► Rural Public Works Construction and Maintenance			
Does your municipality own/maintain rural ² roads:		<input type="checkbox"/>	Yes
		<input checked="" type="checkbox"/>	No
If your answer is No then skip to C.2.f.			
Place a Y in the boxes next to activities where applicable BMPs were implemented. If not applicable, type NA in the box and provide an explanation in the comments section below. Place an N in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.			
<input type="checkbox"/>	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas		
<input type="checkbox"/>	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources		
<input type="checkbox"/>	No impact to creek functions including migratory fish passage during construction of roads and culverts		
<input type="checkbox"/>	Inspection of rural roads for structural integrity and prevention of impact on water quality		
<input type="checkbox"/>	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts and excessive erosion		
<input type="checkbox"/>	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate		
<input type="checkbox"/>	Inclusion of measures to reduce erosion, provide fish passage, and maintain natural stream geomorphology when replacing culverts or design of new culverts or bridge crossings		
Comments including listing increased maintenance in priority areas:			

²Rural means any watershed or portion thereof that is developed with large lot home-sites, such as one acre or larger, or with primarily agricultural, grazing or open space uses.

C.2.f. ► Corporation Yard BMP Implementation			
Place an X in the boxes below that apply to your corporations yard(s):			
<input type="checkbox"/>	We do not have a corporation yard		
N/A	Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit		
<input type="checkbox"/>	We have a Stormwater Pollution Prevention Plan (SWPPP) for the Corporation Yard(s)		
Place an X in the boxes below next to implemented SWPPP BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type NA in the box. If one or more of the BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:			
N/A	Control of pollutant discharges to storm drains such as wash waters from cleaning vehicles and equipment		
N/A	Routine inspection prior to the rainy seasons of corporation yard(s) to ensure non-stormwater discharges have not entered the storm drain system		
N/A	Containment of all vehicle and equipment wash areas through plumbing to sanitary or another collection method		
X	Use of dry cleanup methods when cleaning debris and spills from corporation yard(s) or collection of all wash water and disposing of wash water to sanitary or other location where it does not impact surface or groundwater when wet cleanup methods are used		
X	Cover and/or berm outdoor storage areas containing waste pollutants		
Comments: The City's Corporation Yard is self-contained and no run-off is discharged to Marsh Creek. The Corporation Yard is located within the confines of the City's Wastewater Treatment Plant. Surface drainage is discharged to on-site percolation ponds.			
If you have a corporation yard(s) that is not an NOI facility, complete the following table for inspection results for your corporation yard(s) or attach a summary including the following information:			
Corporation Yard Name	Inspection Date (1x/year required)	Inspection Findings/Results	Follow-up Actions

Section 3 - Provision C.3 Reporting New Development and Redevelopment

C.3.b.v.(2)(a) ► Green Streets Status Report

(All projects to be completed by December 1, 2014)

On an annual basis (if applicable), report on the status of any pilot green street projects within your jurisdiction. For each completed project, report the capital costs, operation and maintenance costs, legal and procedural arrangements in place to address operation and maintenance and its associated costs, and the sustainable landscape measures incorporated in the project including, if relevant, the score from the Bay-Friendly Landscape Scorecard.

Summary:

The C.3 New Development and Redevelopment section of the CCCWP's FY 14-15 Annual Report includes a description of activities conducted at the countywide or regional level.

C.3.b.v.(1) ► Regulated Projects Reporting

Fill in attached table **C.3.b.v.(1)** or attach your own table including the same information.

C.3.e.v. ► Alternative or In-Lieu Compliance with Provision C.3.c.

(For FY 11-12 Annual Report and each Annual Report thereafter)

Is your agency choosing to require 100% LID treatment onsite for all Regulated Projects and not allow alternative compliance under Provision C.3.e.?

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
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Comments (optional):

C.3.e.vi ► Special Projects Reporting

1. Has your agency received, but not yet granted final discretionary approval of, a development permit application for a project that has been identified as a potential Special Project based on criteria listed in MRP Provision C.3.e.ii(2) for any of the three categories of Special Projects (Categories A, B or C)?		Yes	X	No
2. Has your agency granted final discretionary approval of a project identified as a Special Project in the March 15, 2015 report? If yes, include the project in both the C.3.b.v.(1) Table, and the C.3.e.vi. Table.		Yes	X	No
If you answered "Yes" to either question, 1) Complete Table C.3.e.vi .below. 2) Attach narrative discussion of 100% LID Feasibility or Infeasibility for each project.				

C.3.h.iv. ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

(1) Fill in attached table C.3.h.iv.(1) or attach your own table including the same information
(2) On an annual basis, provide a discussion of the inspection findings for the year and any common problems encountered with various types of treatment systems and/or HM controls. This discussion should include a general comparison to the inspection findings from the previous year.
<p>Summary:</p> <p>The treatment systems within the City of Brentwood include Hydrodynamic Separators (Primarily CDS Units), Inlet Cartridge Filters and/or Bio-Retention Facilities. City owned and maintained separators and filters are pumped out annually regardless of the condition. Debris accumulation has not been excessive. Private facilities are inspected annually or less frequently depending on debris accumulation or maintenance indicators. Bio-retention facilities are typically inspected during relatively heavy storm events. Momentary ponding can be observed but eventually infiltrate once the heaviest storm surges have ceased. Maintenance and trash pickup is conducted by landscape maintenance crews.</p> <p>Common problems include determining and enforcing maintenance responsibility when ownership or management changes, or when multiple businesses discharge to the same system. Additionally, some business owners have been non-communicative due to financial pressures. Some of the hydrodynamic separator facilities appear to have never been maintained yet function properly and flows are not impeded by debris. In some of these cases, the facility may have gone out of business or may not have ever commenced operation.</p> <p>Current year findings are similar to the prior year.</p>

(3) On an annual basis, provide a discussion of the effectiveness of the O&M Program and any proposed changes to improve the O&M Program (e.g., changes in prioritization plan or frequency of O&M inspections, other changes to improve effectiveness program).

Summary:
The City of Brentwood maintains a good relationship with the key servicing companies maintaining the majority of these facilities throughout the City and we are notified of all the clients receiving their services annually. Owners of facilities that are in need of servicing are typically directed to one of these companies during or subsequent to City staff inspections. Communications with these companies for business development ensures a positive level of follow-up and compliance. No changes are anticipated.

(4) During the reporting year, did your agency:

• Inspect all newly installed stormwater treatment systems and HM controls within 45 days of installation?	X	Yes		No		Not applicable. No new facilities were installed.
• Inspect at least 20 percent of the total number of installed stormwater treatment systems or HM controls? ³	X	Yes		No		Not applicable. No treatment measures
• Inspect at least 20 percent of the total number of installed vault-based systems?	X	Yes		No		Not applicable. No vault systems.

If you answered “No” to any of the questions above, please explain:

C.3.i. ► Required Site Design Measures for Small Projects and Detached Single Family Home Projects

On an annual basis, discuss the implementation of the requirements of Provision C.3.i, including ordinance revisions, permit conditions, development of standard specifications and/or guidance materials, and staff training.

Summary:

The Contra Costa Clean Water Program adopted a December 1, 2012 addendum to the Stormwater C.3 Guidebook, 6th Edition. The addendum, “Preparing a Stormwater Control Plan for a Small Land Development Project,” includes step-by-step instructions, a project data form, and standard specifications for runoff reduction measures. The City of Brentwood’s stormwater ordinance requires that applications for development approvals for projects subject to the permit’s new development requirements include a Stormwater Control Plan meeting the criteria in the most recent version of the Stormwater C.3 Guidebook.

³If there is only 1 treatment measure in the jurisdiction, the agency must inspect it every year.

C.3.b.v.(1) ► Regulated Projects Reporting Table (part 1) – Projects Approved During the Fiscal Year Reporting Period

Project Name Project No.	Project Location ¹⁰ , Street Address	Name of Developer	Project Phase No. ¹¹	Project Type & Description ¹²	Project Watershed ¹³	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft ²) ¹⁴	Total Replaced Impervious Surface Area (ft ²) ¹⁵	Total Pre- Project Impervious Surface Area ¹⁶ (ft ²)	Total Post- Project Impervious Surface Area ¹⁷ (ft ²)
Private Projects											
Amber Park IV	Empire Ave./Amber Ln.	Discovery Builders	IV of IV	8 Single Family Homes	Marsh Creek	1.20	1.10	24,756	0	0	24,756
Mission Grove II	Armstrong Way/Nunn St.	Discovery Builders	II of II	70 Single Family Homes	Marsh Creek	9.34	9.34	290,110	0	0	290,110
Ferro-Ronconi	Balfour Rd/Griffith Ln	Discovery Builders	I of I	160 Single Family Homes	Marsh Creek	42.34	42.34	1,677,496	0	0	1,677,496
Bella Fiore	Shady Willow Ln./Amber Ln.	Meritage Homes	I of I	98 Single Family Homes	Marsh Creek	13.49	13.49	550,598	0	0	550,598
Renaissance @ Windy Springs	Amber Ln./Windy Springs Ln.	Bradford Communities	I of I	9 Single Family Homes	Marsh Creek	2.35	2.35	95,832	0	0	95,832
Palmilla II	Griffith Ln./Central Ave.	Pulte Homes	II of II	97 Single Family Homes	Marsh Creek	20.59	20.59	864,666	0	0	864,666
Rock Church	Grant St./Adams Way	The Rock of Brentwood	I of II	Commercial	Marsh Creek	2.13	2.13	64,904	0	0	64,904
Sprouts	Sand Creek Rd./Shady Willow Ln.	G&I VII Brentwood, LP	I of I	Commercial	Marsh Creek	2.90	2.90	105,851	0	0	105,851
Public Projects											
N/A											
Comments:											

¹⁰Include cross streets

¹¹If a project is being constructed in phases, indicate the phase number and use a separate row entry for each phase. If not, enter "NA".

¹²Project Type is the type of development (i.e., new and/or redevelopment). Example descriptions of development are: 5-story office building, residential with 160 single-family homes with five 4-story buildings to contain 200 condominiums, 100 unit 2-story shopping mall, mixed use retail and residential development (apartments), industrial warehouse.

¹³State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.

¹⁴All impervious surfaces added to any area of the site that was previously existing pervious surface.

¹⁵All impervious surfaces added to any area of the site that was previously existing impervious surface.

¹⁶For redevelopment projects, state the pre-project impervious surface area.

¹⁷For redevelopment projects, state the post-project impervious surface area.

C.3.b.v.(1) ► Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period (private projects)

Project Name Project No.	Application Deemed Complete Date ¹⁸	Application Final Approval Date ¹⁹	Source Control Measures ²⁰	Site Design Measures ²¹	Treatment Systems Approved ²²	Type of Operation & Maintenance Responsibility Mechanism ²³	Hydraulic Sizing Criteria ²⁴	Alternative Compliance Measures ^{25/26}	Alternative Certification ²⁷	HM Controls ^{28/29}
Private Projects										
Amber Park IV	4/15/14	4/25/14	Efficient Irrigation System		Bio-Retention Areas	Homeowner	C.3.i	N/A	N/A	N/A
Mission Grove II	6/8/11	6/28/11	Storm Drain Stenciling	Minimize Impervious Surfaces	Bio-Retention Areas	O&M Agreement w/ HOA	C.3.d	N/A	N/A	Applied
Ferro-Ronconi	5/7/13	6/21/13	Storm Drain Stenciling	Minimize Impervious Surfaces	Bio-Retention Areas	O&M Agreement w/ HOA	C.3.d	N/A	N/A	Applied
Bella Fiore	9/16/14	9/16/14	Storm Drain Stenciling	Minimize Impervious Surfaces	Bio-Retention Areas	O&M Agreement w/ HOA	C.3.d	N/A	N/A	Applied
Renescence @ Windy Springs	8/19/14	8/19/14	Storm Drain Stenciling	Minimize Impervious Surfaces	Bio-Retention Areas	O&M Agreement w/ HOA	C.3.d	N/A	N/A	Applied
Palmilla II	6/3/14	6/24/14	Storm Drain Stenciling	Minimize Impervious Surfaces	Bio-Retention Areas	O&M Agreement w/ HOA	C.3.d	N/A	N/A	Applied

¹⁸For private projects, state project application deemed complete date. If the project did not go through discretionary review, report the building permit issuance date.

¹⁹For private projects, state project application final discretionary approval date. If the project did not go through discretionary review, report the building permit issuance date.

²⁰List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

²¹List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.

²²List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).

²³List the legal mechanism(s) (e.g., O&M agreement with private landowner; O&M agreement with homeowners' association; O&M by public entity, etc...) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.

²⁴See Provision C.3.d.i. "Numeric Sizing Criteria for Stormwater Treatment Systems" for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

²⁵For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.v.(1)(m)(i) for the offsite project.

²⁶For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.v.(1)(m)(ii) for the Regional Project.

²⁷Note whether a third party was used to certify the project design complies with Provision C.3.d.

²⁸If HM control is not required, state why not.

²⁹If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), bioretention unit(s), regional detention basin, or in-stream control).

C.3.b.v.(1) ► Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period (private projects)

Project Name Project No.	Application Deemed Complete Date ¹⁸	Application Final Approval Date ¹⁹	Source Control Measures ²⁰	Site Design Measures ²¹	Treatment Systems Approved ²²	Type of Operation & Maintenance Responsibility Mechanism ²³	Hydraulic Sizing Criteria ²⁴	Alternative Compliance Measures ^{25/26}	Alternative Certification ²⁷	HM Controls ^{28/29}
Rock Church	7/21/15	7/21/15	Storm Drain Stenciling	Minimize Impervious Surfaces	Bio-Retention Areas	O&M Agreement	C.3.d	N/A	N/A	Applied
Sprouts	11/5/13	11/5/13	Storm Drain Stenciling	Minimize Impervious Surfaces	Bio-Retention Areas	O&M Agreement	C.3.d	N/A	N/A	Applied
Comments:										

C.3.b.v.(1) ► Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period (public projects)										
Project Name Project No.	Approval Date ³⁰	Date Construction Scheduled to Begin	Source Control Measures ³¹	Site Design Measures ³²	Treatment Systems Approved ³³	Operation & Maintenance Responsibility Mechanism ³⁴	Hydraulic Sizing Criteria ³⁵	Alternative Compliance Measures ^{36/37}	Alternative Certification ³⁸	HM Controls ^{39/40}
Public Projects										
N/A										
Comments:										

³⁰For public projects, enter the plans and specifications approval date.

³¹List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

³²List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.

³³List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).

³⁴List the legal mechanism(s) (e.g., maintenance plan for O&M by public entity, etc...) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.

³⁵See Provision C.3.d.i. "Numeric Sizing Criteria for Stormwater Treatment Systems" for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

³⁶For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.v.(1)(m)(i) for the offsite project.

³⁷For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.v.(1)(m)(ii) for the Regional Project.

³⁸Note whether a third party was used to certify the project design complies with Provision C.3.d.

³⁹If HM control is not required, state why not.

⁴⁰If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), bioretention unit(s), regional detention basin, or in-stream control).

C.3.h.iv. ► Table of Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

Fill in table below or attach your own table including the same information.

Name of Facility/Site Inspected	Address of Facility/Site Inspected	Newly Installed? (YES/NO) ⁴¹	Party Responsible ⁴² For Maintenance	Date of Inspection	Type of Inspection ⁴³	Type of Treatment/HM Control(s) Inspected ⁴⁴	Inspection Findings or Results ⁴⁵	Enforcement Action Taken ⁴⁶	Comments/Follow-up
Amber Park 4	Amber Ln./Henry Hart Dr.	Yes	Discovery Builders	6/1/2015	Routine	Bio-Retention Facility (each front yard)	Inspected during construction	N/A	~1,000 SF
Mission Grove 1/2	Armstrong Rd./Carnegie Ln./Nunn St.	Yes	Discovery Builders	6/29/2015	Routine	Bio-Retention Facility	Inspected during construction	N/A	
Brentwood City Hall	150 City Park Way	No	City of Brentwood	12/02/2014	Annual	Contech Hydrodynamic Separator	Maintained by City	N/A	
Brentwood Station	6061 Lone Tree Way	No	Brentwood Station	4/13/2015	Biannual	Hydrodynamic Separator (CDS)/Catch Basin Inserts	Maintained by SWIM's	N/A	
Brentwood Sunset Park	655 Sunset Rd.	Yes	City of Brentwood	6/26/2014	Routine	Bio-Retention Facility	Inspected during construction	N/A	
Acorn Self Storage	6900 Lone Tree Way	No	Acorn Self Storage	4/13/2015	Biannual	Hydrodynamic Separator	Maintained by SWIM's	N/A	
Auto Zone	7609 Brentwood Blvd .	Yes	Auto Zone	4/28/2013	Routine	Bio-Retention Facility	New Facility	N/A	
Black Angus	2355 Sand Creek Rd.	Yes	Black Angus	1/21/2014	Routine	Bio-Retention Facility	New Facility	N/A	
Balfour Medical Facility	2221 & 2201 Balfour Rd,	No	Equus Group	5/7/2014	Routine	Catch Basin Filters	Maintained by DPS	N/A	
Country Club Retail	380 West Country Club Dr.	No	Equus Group	2/24/2014	Biannual	Hydrodynamic Separator	Maintained by DPS	N/A	
Delta Valley Athletic Club	120 & 140 Guthrie Lane	No	Matt Ellison	5/7/2014	Biannual	Catch Basin Filters	Maintained by DPS	N/A	
Harvest Commerce Center	9000 Brentwood Blvd.	No	Property Innovations; 925-516-1629	2/7/2013	Biannual	Hydrodynamic Separators (2)	Maintained by Toto Rooter	N/A	

⁴¹Indicate "YES" if the facility was installed within the reporting period, or "NO" if installed during a previous fiscal year.

⁴²State the responsible operator for installed stormwater treatment systems and HM controls.

⁴³State the type of inspection (e.g., 45-day, routine or scheduled, follow-up, etc.).

⁴⁴State the type(s) of treatment systems inspected (e.g., bioretention facility, flow-through planter, infiltration basin, etc...) and the type(s) of HM controls inspected, and indicate whether the treatment system is an onsite, joint, or offsite system.

⁴⁵State the inspection findings or results (e.g., proper installation, improper installation, proper O&M, immediate maintenance needed, etc.).

⁴⁶State the enforcement action(s) taken, if any.

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C.3 – New Development and Redevelopment

Immaculate Heart of Mary Church	500 Fairview Ave	No	Church	6/1/2014	Biannual	Retention Basin/Catch Basin Inserts	Maintained by SWIM's	N/A	
In-N-Out #189	5581 Lone Tree Way	No	In-N-Out	5/7/2014	Biannual	Inlet Filters	Maintained by DPS	N/A	
LDS Church	1875 Highland Way	No	Church	12/15/2014	Routine	Bio-Retention Facility	Functional	N/A	
Mission Grove	Armstrong Rd. (Subdivision #9154)	Yes	Discovery Builders	12/15/2014	Routine	Bio-Retention Facilities	Functional	N/A	Not yet Landscaped
Jehovah's Witness Church	Smith Road	Yes	Church	3/6/2013	Routine	Bio-Retention Facility	Functional	N/A	
Mike's Auto Body	4535 O'Hara Ave.	No	Mike Rose	4/1/2014	Biannual	Catch Basin Inserts	Maintained by SWIM's	N/A	
Shops at Fairview	3101 Balfour Rd./corner with Fairview Ave.	No	Balfour Partners	1/12/2015	Biannual	Hydrodynamic Separator / Bio-Retention Facility	Maintained by SWIM's	N/A	Matt Tunney 925-626-3963
Streets of Brentwood	2565 San Creek Rd.	No	Streets of Brentwood	5/8/2014	Biannual	Bio-Retention Facility	Maintained by SWIM's	N/A	
Empire Retail Shopping Center	2415 Empire Ave.	No	Empire Retail Shopping Center	6/1/2014	Biannual	Bio-Retention Facility	Maintained by SWIM's	N/A	
Walgreens #9102	2271 Balfour Rd./Cortona Way	No	Walgreens	6/19/2014	Biannual	Hydrodynamic Separator/Bio-Retention Facility	Maintained by SWIM's	N/A	
Walgreens #9978	6570 Lone Tree Way	No	Walgreens	6/19/2014	Routine	Bio-Retention Facility	Maintained by DPS	N/A	
Vic Stewarts	2270 Balfour Rd.	No	Vic Stewarts	2/28/2014	Routine	Bio-Retention Facility	Functional - Maintained	N/A	
Vornhagen Body & Paint	600 Harvest Park Dr.	No	Vornhagen	4/14/2014	Biannual	Catch Basin Inserts	Maintained by SWIM's	N/A	
Best Buy Center	6600 Lone Tree Way	No	Best Buy Center	1/12/15	Biannual	Hydrodynamic Separator / Bio-Retention Facility	Maintained by SWIM's	N/A	
Immaculate Heart of Mary Church	500 Fairview Ave.	No	Immaculate Heart of Mary Church	2/9/2014	Biannual	Catch Basin Inserts/Settlement Basin	Maintained by SWIM's	N/A	
Carmel Estates	Carmel Pkwy/Marsh Creek	Yes	City of Brentwood	10/1/2013	Routine	Bio-Retention Facility		N/A	
Trash Capture Device	Thompsons Dr.	Yes	City of Brentwood	12/2/2014	Quarterly	Trash Capture Device	Maintained by City	N/A	Screens become clogged by leaves. Drainage often flows over by bypass weir.
Balfour Rd. & Cortona Way	Behind Chevron next to Car Wash	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
GL_048 - John Muir Pkwy./Eagle Rock Way	Behind Kindercare	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	

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GI_012 - Neroly Rd.	End of Pristine Way	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
GI_011 - Neroly Rd.	End of Simba Place	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
GI_008 - Sycamore Dr.	White Swan St./Ibis St.	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
GI_013 - Helena Way	Backs up to Creek	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
GI_010 - 1473 Fairview Ave.	In Backyard (easement)	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
Holsapple Way	Behind Rose Bushes	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
GI_055 – Atherton Blvd. & Sheldon Dr.	In Crosswalk	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
GI_056 - Blumen Ave. & Atherton Blvd.	In Crosswalk	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
Wayne Dr.	Next to Creek on Grant St.	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
Winco #52	6700 Lone Tree Way	No	Winco	3/3/2014	Biannual	Hydrodynamic Separator/Inets	Maintained by DPS	N/A	
GI_002 - Sand Creek Rd.	Westbound east of O'Hara	No	City of Brentwood	12/2/2014	Annual	Hydrodynamic Separator	Maintained by City	N/A	
GI_001	Sand Creek Business Center	No	Sand Creek Business Center	12/2011	Annual	Hydrodynamic Separator	Maintained by REM	N/A	
GI_003	Balfour Rd./Fairview Ave.	No	Safeway	6/8/2015	Biannual	Hydrodynamic Separator	Maintained by SWIM's	N/A	
GI_004	Fairview Ave./Pierce St. – 6935 Lone Tree Way	No	Tri City Plaza	4/18/2011	Routine	Hydrodynamic Separator	No issues	N/A	Separator unit serves future development
GI_005	Brentwood Bl./Balfour Rd. (S)	No	Brentwood Car Wash	8/4/2014	Biannual	Hydrodynamic Separator	Maintained by SWIM's	N/A	
GI_006	Brentwood Bl./Balfour Rd. (N)	No	Garin Ranch Commercial Center	4/1/2014	Routine	Hydrodynamic Separator	Maintained by REM	N/A	
GI_007	Brentwood Bl./Balfour Rd. (N)	No	Garin Ranch Commercial Center	4/1/2014	Routine	Hydrodynamic Separator	Maintained by REM	N/A	
GI_009 – Copper Gate	Business Center Dr./Copper Gate	No	Copper Gate	9/5/2006		Hydrodynamic Separator	Needs Maintenance		Needs maintenance
GI_014	Balfour Rd./Griffith Ln.	No	In-Shape Health Club	1/27/2012	Biannual	Hydrodynamic Separator	Functional	N/A	
GI_015- Empire Crossings	6471 Lone Tree Way	No	Empire Crossings Shopping Center	1/12/2015	Annual	Hydrodynamic Separator	Maintained by SWIM's	N/A	

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GI_016	Highland Dr./Sand Creek Rd.	No	La Fuente Plaza	1/13/2012	Annual	Hydrodynamic Separator	Functional		
GI_018	Deer Ridge Country Club/Foothill Dr.	No	Deer Ridge Country Club			Hydrodynamic Separator			
GI_019	Deer Ridge Country Club/Foothill Dr.	No	Deer Ridge Country Club			Hydrodynamic Separator			
GI_020	Home Depot/Lone Tree Way	No	Home Depot	4/14/2014	Annual	Hydrodynamic Separator	Maintained by SWIM's	N/A	
GI_021	Business Center Dr./Copper Gate	No	Copper Gate	9/5/2006		Hydrodynamic Separator	Needs Maintenance		Needs Maintenance
GI_023	2400 Balfour Rd.	No	John Muir Medical Center	4/13/2015	Biannual	Hydrodynamic Separator	Maintained by SWIM's	N/A	
GI_024	Elkins Way	No				Hydrodynamic Separator		N/A	
GI_025	Elkins Way	No				Hydrodynamic Separator		N/A	
GI_026	Elkins Way	No				Hydrodynamic Separator		N/A	
GI_027	Arbor Ridge Apartments/Shady Willow Ln.	No	Arbor Ridge Apartments	1/27/2012	Annual	Hydrodynamic Separator	Maintained by REM	N/A	
GI_028	Arbor Ridge Apartments/Shady Willow Ln.	No	Arbor Ridge Apartments	3/13/2013	Annual	Hydrodynamic Separator	Maintained by REM	N/A	
GI_029	Arbor Ridge Apartments/Shady Willow Ln.	No	Arbor Ridge Apartments	3/13/2013	Annual	Hydrodynamic Separator	Maintained by REM	N/A	
GI_030	Arbor Ridge Apartments/Shady Willow Ln.	No	Arbor Ridge Apartments	3/13/2013	Annual	Hydrodynamic Separator	Maintained by REM	N/A	
GI_031	3291 Walnut Blvd./Continente Way	No	Dr. Jeffry – Walnut Commercial Center	10/1/2014	Annual	Hydrodynamic Separator	Maintained by SWIM's	N/A	
GI_032	Central Ave./Walnut Blvd.	No	City of Brentwood	9/1/2014	Annual	Fossil Filter	Maintained by City	N/A	Undeveloped Area – Pervious Field
GI_033	Central Ave./Walnut Blvd.	No	City of Brentwood	9/1/2014	Annual	Fossil Filter	Maintained by City	N/A	Undeveloped Area – Pervious Field
GI_034	Adams Ln.	No	BUSD			Hydrodynamic Separator			
GI_035/045 – Westmont of Brentwood	450 John Muir Pkwy.	No	Westmont of Brentwood	4/13/2015	Biannual	Hydrodynamic Separator (2)	Maintained by SWIM's	N/A	
GI_036 – Brentwood Medical Center	350 John Muir Pkwy	No	Brentwood Medical Center	12/8/2014	Biannual	Hydrodynamic Separator	Maintained by SWIM's	N/A	

GL_039	Elkins Way	No		3/16/2011	Annual	Hydrodynamic Separator	Functional	N/A	Light use at this time
GL_040	415 Beatrice Ct.	No	Woodmore Finishing/Road Runner RV	3/16/2011	Annual	Hydrodynamic Separator	Needs Maintenance	NOV	Spoke to Owners of both businesses and wrote NOV letter
GL_041	Elkins Way	No		3/16/2011	Annual	Hydrodynamic Separator	Functional	N/A	Light use at this time
GL_042	Carrol Ct.	No	Eco Water	4/12/2011	Annual	Hydrodynamic Separator	Maintained	NOV	
GL_043	420 Beatrice Ct.	No	Sean McCauley	5/16/2015	Annual	Hydrodynamic Separator	Maintained by SWIM's	NOV	
GL_044 – Country Club Retail	380 West Country Club Dr.	No	Equus Group	2/10/2012	Annual	Hydrodynamic Separator	Maintained by DPS	N/A	
GL_046	Elkins Way			3/16/2011	Annual	Hydrodynamic Separator	Functional	N/A	
GL_048	Foothill Dr.	No	City of Brentwood	9/1/2014	Annual	Hydrodynamic Separator	Maintained by City		
GL_049	2101 Sand Creek Rd.	No	Villa Amador	8/23/2012	Biannual	Hydrodynamic Separator	Maintained by REM		
GL_050	2101 Sand Creek Rd.	No	Villa Amador	8/23/2012	Biannual	Hydrodynamic Separator	Maintained by REM		
GL_051	2101 Sand Creek Rd.	No	Villa Amador	8/23/2012	Biannual	Hydrodynamic Separator	Maintained by REM		
GL_052	2101 Sand Creek Rd.	No	Villa Amador	8/23/2013	Biannual	Hydrodynamic Separator	Maintained by REM		
GL_053	Central Blvd./UPRR	No	William Lyon Homes	5/13/2014	Annual	Hydrodynamic Separator	Functional	N/A	Looks Clear – Lyon Homes Acquiring Property then will Maintain
GL_054	Central Blvd./UPRR	No	William Lyon Homes	5/13/2014	Annual	Hydrodynamic Separator	Functional	N/A	Looks Clear – Lyon Homes Acquiring Property then will Maintain
GL_057 – Garin Corners	Wildflower/Balfour Rd.	No	Prescott Management	4/14/2014	Biannual	Hydrodynamic Separator	Maintained by SWIM's	N/A	Al Cui 415-766-3366
GL_058 – Garin Corners	Wildflower/Balfour Rd.	No	Prescott Management	4/14/2014	Biannual	Hydrodynamic Separator	Maintained by SWIM's	N/A	Al Cui 415-766-3366
GL_060	<i>Fairview Ave – 6935 Lone Tree Way</i>	No	Tri City Plaza	4/18/2011	Routine	Hydrodynamic Separator	Functional	N/A	Spoke to property manager about getting a maintenance contract established
GL_061	Sand Creek Rd./Raley's Shopping Center	No	Raley's Shopping Center	2/9/2015	Biannual	Hydrodynamic Separator	Maintained by SWIM's		

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C.3 – New Development and Redevelopment

GI_062	1275 Fairview Ave.	No	Resurrection Ministries Church	1/12/2015	Biannual	Hydrodynamic Separator	Maintained by SWIM's	N/A	
GI_063 – Bank of the West	4550 Balfour Rd.	No	Bank of the West		Annual	Hydrodynamic Separator	Needs Maintenance		
GI_064 – Walgreens #6871	4520 Balfour Rd.	No	Walgreens	6/19/2014	Annual	Hydrodynamic Separator	Maintained by DPS	N/A	
GI_065 – Sand Creek Business Center	191 Sand Creek Rd.	No	Sand Creek Business Center	8/23/2012	Annual	Hydrodynamic Separator	Maintained by REM		
GI_066 – Sand Creek Business Center	191 Sand Creek Rd.	No	Sand Creek Business Center	8/23/2012	Annual	Hydrodynamic Separator	Maintained by REM		
GI_067 – Sand Creek Business Center	191 Sand Creek Rd.	No	Sand Creek Business Center	8/23/2012	Annual	Hydrodynamic Separator	Maintained by REM		
GI_067a – Sand Creek Business Center	191 Sand Creek Rd.	No	Sand Creek Business Center	8/23/2012	Annual	Hydrodynamic Separator	Maintained by REM		
GI_068 – Home Depot	5631 Lone Tree Way	No	Home Depot	4/13/2014	Biannual	Hydrodynamic Separator	Maintained by SWIM's	N/A	
GI_069	750 Larkspur Ln.	No	Brentwood Senior Commons	2/5/2013		Hydrodynamic Separator	Needs Maintenance	Sent Warning	
GI_070	750 Larkspur Ln.	No	Brentwood Senior Commons	2/5/2013		Hydrodynamic Separator	Needs Maintenance	Sent Warning	
GI_071	750 Larkspur Ln.	No	Brentwood Senior Commons	2/5/2013		Hydrodynamic Separator	Needs Maintenance	Sent Warning	
GI_072 – Streets of Brentwood	2565 Sand Creek Rd.	No	Streets of Brentwood – Continental Real Estate	2/9/2015	Annual	Hydrodynamic Separator	Maintained by SWIM's	N/A	
GI_073	Ghiggeri Dr.	No	City of Brentwood	12/2/2014	Annual	Catch Basin Cartridge Filter Insert	Maintained by City	N/A	
GI_074	Ghiggeri Dr.	No	City of Brentwood	12/2/2014	Annual	Catch Basin Cartridge Filter Insert	Maintained by City	N/A	
GI_075	Lone Tree Way/Empire Ave.	Yes	City of Brentwood	12/2/2014	Quarterly	REM Catch Basin Cartridge Filter Insert		N/A	Part of Trash Assessment Study
GI_076	San Jose Ave./Raley's Shopping Center	Yes	City of Brentwood	12/2/2014	Quarterly	REM Catch Basin Cartridge Filter Insert		N/A	Part of Trash Assessment Study
GI_077	Dainty Ave./Marsh Creek Bridge	Yes	City of Brentwood	12/2/2014	Quarterly	REM Catch Basin Cartridge Filter Insert		N/A	Part of Trash Assessment Study
GI_078	Walnut Blvd/Oak St.	Yes	City of Brentwood	12/2/2014	Quarterly	REM Catch Basin Cartridge Filter Insert		N/A	Part of Trash Assessment Study

C.3.e.vi.Special Projects Reporting Table												
Reporting Period –January1 – June 30, 2015												
Project Name & No.	Permittee	Address	Application Submittal Date ⁴⁷	Status ⁴⁸	Description ⁴⁹	Site Total Acreage	Density DU/Acre	Density FAR	Special Project Category ⁵⁰	LID Treatment Reduction Credit Available ⁵¹	List of LID Stormwater Treatment Systems ⁵²	List of Non-LID Stormwater Treatment Systems ⁵³
N/A	N/A								Category A: Category B: Category C: Location: Density: Parking:	Category A: Category B: Category C: Location: Density: Parking:	Indicate each type of LID treatment system and the percentage of total runoff treated	Indicate each type of non-LID treatment system and the percentage of total runoff treated. Indicate whether minimum design criteria met or certification received

⁴⁷Date that a planning application for the Special Project was submitted.

⁴⁸ Indicate whether final discretionary approval is still pending or has been granted, and provide the date or version of the project plans upon which reporting is based.

⁴⁹Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.

⁵⁰ For each applicable Special Project Category, list the specific criteria applied to determine applicability. For each non-applicable Special Project Category, indicate n/a.

⁵¹For each applicable Special Project Category, state the maximum total LID Treatment Reduction Credit available. For Category C Special Projects also list the individual Location, Density, and Minimized Surface Parking Credits available.

⁵²: List all LID stormwater treatment systems proposed. For each type, indicate the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area.

⁵³List all non-LID stormwater treatment systems proposed. For each type of non-LID treatment system, indicate: (1) the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area, and (2) whether the treatment system either meets minimum design criteria published by a government agency or received certification issued by a government agency, and reference the applicable criteria or certification. (Contra Costa's criteria were adopted March 20, 2013.)

Section 4 – Provision C.4 Industrial and Commercial Site Controls

Program Highlights

Provide background information, highlights, trends, etc.

Updated Potential Facility list with priorities and frequencies. Inspections were conducted at multi-use shopping centers, restaurants, retail gas outlets, auto service facilities, fast food establishments, convenience stores, grocery stores, concrete batch plants and trash enclosures. Two inspectors participated in the workshop on the New Industrial General Permit hosted by the Contra Costa Clean Water Program at the Central Contra Costa Sanitary District. Staff regularly participates in the Countywide Municipal Operations Committee.

Refer to the C.4. Industrial and Commercial Site Controls section of the CCCWPs FY 14-15 Annual Report for a description of activities of the CCCWP's Municipal Operations Committee and/or the BASMAA Municipal Operations Committee.

C.4.b.i. ► Business Inspection Plan

Do you have a Business Inspection Plan? Yes No

If No, explain:

C.4.b.iii.(1) ► Potential Facilities List

List below or attach your list of industrial and commercial facilities in your Inspection Plan to inspect that could reasonably be considered to cause or contribute to pollution of stormwater runoff.

See attachment C.4.b.iii.(1) ► Potential Facilities List / C.4.b.iii.(2) ► Facilities Scheduled for Inspection

C.4.b.iii.(2) ► Facilities Scheduled for Inspection

List below or attach your list of facilities scheduled for inspection during the current fiscal year.

See Attachment C.4.b.iii.(2)

Permittee Name: City of Brentwood

C.4.c.iii.(1) ► Facility Inspections

Fill out the following table or attach a summary of the following information. Indicate your violation reporting methodology below.

<input checked="" type="checkbox"/>	Permittee reports multiple discrete violations on a site as one violation.
<input type="checkbox"/>	Permittee reports the total number of discrete violations on each site.

	Number	Percent
Number of businesses inspected	104	
Total number of inspections conducted	124	
Number of violations (excluding verbal warnings)	10	
Sites inspected in violation	10	9.6
Violations resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	8	80

Comments:
Sites inspected in violation are counted by a specific sorting of all facility enforcement actions from the City's Data Base. The Data Base will document the type of enforcement action taken.

C.4.c.iii.(2) ► Frequency and Types/Categories of Violations Observed

Fill out the following table or attach a summary of the following information.

Type/Category of Violations Observed	Number of Violations
Actual discharge (e.g. active non-stormwater discharge or clear evidence of a recent discharge)	2
Potential discharge and other	6

Comments:
Discharge streams at a particular site are counted as one discharge per inspection.

C.4.c.iii.(2) ► Frequency and Type of Enforcement Conducted

Fill out the following table or attach a summary of the following information.

	Enforcement Action (as listed in ERP) ⁴⁸	Number of Enforcement Actions Taken	% of Enforcement Actions Taken⁴⁹
Level 1	Warning Notice, Verbal Warning, Education, RTC	5	50
Level 2	Cease & Desist; Stop Work Orders; NOV	4	40
Level 3	Administrative Citations	1	10
Level 4	Referral State Agencies	0	0
Total		10	100

C.4.c.iii.(3) ► Types of Violations Noted by Business Category

Fill out the following table or attach a summary of the following information.

Business Category⁵⁰	Number of Actual Discharge Violations	Number of Potential/Other Discharge Violations
Round Table Pizza - Restaurant		1
KFC Brentwood Blvd. – Restaurant	1	1
Mikado Bistro - Restaurant		1
Dickey's Barbeque Pit - Restaurant		1
Food Max – Grocery Store	1	1
Towne Centre Plaza – Shopping Center	1	1
Pho Vietnam - Restaurant	1	1
Antioch Building Materials – Industrial (Concrete Batch Plant)		1
Redwood Apartments		1
Sweeney's Restaurant	1	1

⁴⁸Agencies to list specific enforcement actions as defined in their ERPs.

⁴⁹Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

⁵⁰List your Program's standard business categories.

C.4.c.iii.(4) ► Non-Filers

List below or attach a list of the facilities required to have coverage under the Industrial General Permit but have not filed for coverage:

There were no industries identified as non-filers during scheduled inspections during this fiscal year.

C.4.d.iii ► Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
Workshop on the New Industrial General Permit – Central Contra Costa Sanitary District (Martinez)	December 16, 2014	<ul style="list-style-type: none"> The New Industrial General Permit (IGP): Overview and Key Features Who's In and Who's Out: Businesses That Must File a Notice of Intent (NOI) The Ins and Outs of Inspecting a NOI Facility When to Make Facility Referrals and Other Questions about the IGP 	2	50
Commercial/Industrial Stormwater Inspection Training Workshop San Ramon Community Center (San Ramon)	April 30, 2015	<ul style="list-style-type: none"> What to Expect in C.4, C.5, C.12, and C.13 from MRP 2.0 Inspecting the San Ramon Valley Unified School (SRVUSD) Service Center Conduct Mock Inspection at SRVUSD The ABCs of PCBs – PCB Investigations, Cleanups, and Inspections Under TSCA Screening Properties for Potential PCB Source Areas PCB Source Area Identification through Industrial Inspections 	0	0

Section 5 – Provision C.5 Illicit Discharge Detection and Elimination

Program Highlights

Provide background information, highlights, trends, etc.

Activities for the reporting year conducted by the City of Brentwood include:

- 1) Maintain our collection system screening program.
- 2) Routine cleaning of all inlets and catch basins on a citywide rotational basis.
- 3) Detection and abatement of complaint based illicit discharges, including issuance of educational handouts to violators where possible.
- 4) Participation in the CCCWP’s Municipal Operations Committee

One trend observed where potential discharges could result includes the placement of tallow bins or grease drums. Following is an example at two adjacent restaurant businesses located in a shopping center (continued and improved from the previous reporting period):

Mikado Bistro and Dickey’s Barbeque Pit had been leaving tallow bins and grease drums in the corner of the parking lot next to a catch basin for several months. After unsuccessfully requests to the restaurants’ management and the tallow recycling companies to relocate them, City staff asked the shopping center property manager to intervene. Finally, after several phone calls and emails with the property manager, she sent a certified letter to the restaurant owners on January 31, 2014 with an ultimatum to comply no later than February 7, 2014. The property was Re-inspected by City staff on February 7, 2014 and the grease bins and drums had been removed. Subsequently, however, the bins ended back outside. Finally in late Spring 2015 City staff got in touch with a tallow collection company who purchased some below-the-counter wheel-out bins that can be stored inside the kitchen. City staff and the vendor talked to the restaurant owner/managers and convinced them to utilize these kitchen bins. The tallow vendor indicated that these would be pumped-out weekly.

This incident is technically a violation due to the high potential for grease spills but is something not specifically addressed in the business inspection plan. Consideration was given as these recycling efforts serve to keeps grease out of the sanitary sewer system and ultimately the storm drain system by avoiding the potential for clean-out and manhole backups. The placement of tallow bins has been a continual issue with restaurant inspections. Most restaurants tend to store tallow bins inside trash enclosures which, in itself, is a violation of the City’s trash enclosure storage guidelines.

Refer to the C.5 Illicit Discharge Detection and Elimination section of the CCCWP’s FY 14-15 Annual Report for description of activities at the countywide or regional level.

C.5.c.iii ► Complaint and Spill Response Phone Number and Spill Contact List

List below or attach your complaint and spill response phone number and spill contact list.

Contact	Description	Phone Number
Public Works Operations	Wastewater, Streets & Solid Waste Divisions – available staff (incident response, emergency remediation)	(925) 516-6000
Community Development Code Enforcement	Code Enforcement – available officer (NOV/Citation)	(925) 516-5420

Public Works Engineering	Stormwater Compliance – Jeff Cowling (incident response, inspection, resolution, education, database tracking)	(925) 382-9052
Brentwood Police Department	Emergency Response for Public Safety	925-778-2441
Contra Costa Hazardous Waste	Emergency Response clean-up and assessment of spill	877-662-8376
Brentwood Public Works Standby	Response for Public Safety	925-382-4157

C.5.d.iii ► Evaluation of Mobile Business Program

Describe implementation of minimum standards and BMPs for mobile businesses and your enforcement strategy. This may include participation in the BASMAA Mobile Surface Cleaners regional program or local activities.

Description:

We provide pamphlets for Wash Water Disposal Practices for Mobile Surface Cleaners and Carpet Cleaners to businesses/owners/employees/maintenance crews when they obtain their business license applications or in the field when activity is observed. Depending on the egregiousness of the discharge, the violator would either be given a pamphlet with an educational talk and (1) the activity shut-down until BMP compliance; or (2) complete shut-down of activity and citation. In either case, the client/manager would be notified and educated/cited accordingly.

Refer to the C.5 Illicit Discharge Detection and Elimination section of CCCWP's FY 14-15 Annual Report for a description of efforts by CCCWP's Municipal Operations Committee and the BASMAA Municipal Operations Committee to address mobile businesses.

C.5.e.iii ► Evaluation of Collection System Screening Program

Provide a summary or attach a summary of your collection screening program, a summary of problems found during collection system screening and any changes to the screening program this FY.

Description

City of Brentwood staff cleans a quarter of the City's sewer system a year and continue to strive on making these goals. We have reached these goals the last three years by cleaning quadrants one, two and three. We are currently working on quadrant four. Our system has been found to be in good shape. However, our main problems continue to be grease, construction debris and concrete.

C.5.f.iii.(1), (2), (3) ► Spill and Discharge Complaint Tracking

Spill and Discharge Complaint Tracking (fill out the following table or include an attachment of the following information)

	Number	Percentage
Discharges reported (C.5.f.iii.(1))	17	
Discharges reaching storm drains and/or receiving waters (C.5.f.iii.(2))	5	29
Discharges resolved in a timely manner (C.5.f.iii.(3))	15	88
Comments:		

We have maintained our S.O.P's (Standard Operating Procedures) for overflows/discharges and have a step by step plan that helps eliminate any sanitary sewer overflows (SSO), chemical spills, etc. from reaching our storm water system. This plan could involve anything from sand bags around a catch basin to eliminate a small amount of discharge from entering the storm drain system to plugging a line that has a larger spill that reached the storm drain system and eliminating it from reaching the creek. Fortunately, the vast majority of Brentwood's storm drain lines are discharged to detention basins. Due to evaporation, infiltration and the region's relatively mild rainy seasons discharges rarely leave the detention basin. Additionally, Brentwood has over 100 various treatment systems upstream of the storm drain infrastructure which prevents potential contaminants from entering the receiving waters. These include bio-retention facilities, hydro dynamic separators, full trash capture devices and inlet filter inserts.

C.5.f.iii.(4) ► Summary of major types of discharges and complaints

Provide a narrative or attach a table and/or graph.

Of the seventeen (17) incidents reported four (5) resulted in a direct discharge to receiving waters via the City's gutter or storm drain inlets (RW suffix below) and twelve (12) were either potential discharges, discharges never reaching a storm drain inlet or discharges reaching a storm drain inlet but intercepted before reaching receiving waters. The sewer and grease discharges were cleaned-up by City Operations Wastewater crews utilizing a vacuum truck in the cleanouts/manholes and storm drain inlets before they flowed downstream to receiving waters. Discharges ranged from silt or mud, automobile oil, concrete residue, grease, sewage and gray water. These discharges were commonly by accident, heavy storm surges or by an individual uneducated in proper BMP's. An educational briefing by City staff and handouts of BMP literature always followed.

1. Round Table Grease Dumping
2. Mikado Asian Bistro Tallow Bin
3. Dicky's BBQ Tallow Bin
4. KFC Grease Interceptor Backup
5. Towne Centre Plaza Sewer Backup
6. Food Max Grease Interceptor Backup
7. Pho Vietnam Sewer Backup
8. Antioch Building Materials Batch Plant Concrete Truck Tracking
9. 1218 Ironwood Dr Pressure Washing Dirt Bikes - RW
10. 713 Revenna Vehicle Oil Leaking
11. 2004 Hedge Ave Vehicle Oil Leaking
12. Brushwood Pl Driveway Concrete Washing - RW
13. Thicket Pl Pool Excavation Spoils
14. American Ave Slope Failure During Storm - RW
15. Ferro-Ronconi Slope Failure during Storm on McClarren Rd – RW
16. Redwood Apartments Brentwood Blvd Sewer Backup
17. Sweeney's Restaurant Remodel Mortar Washout - RW

Section 6 – Provision C.6 Construction Site Controls

C.6.e.iii.1.a, b, c ▶ Site/Inspection Totals		
Number of High Priority Sites (sites disturbing < 1 acre of soil requiring storm water runoff quality inspection) (C.6.e.iii.1.a)	Number of sites disturbing ≥ 1 acre of soil (C.6.e.iii.1.b)	Total number of storm water runoff quality inspections conducted (include only High Priority Site and sites disturbing 1 acre or more) (C.6.e.iii.1.c)
0	18	814
Comments: All active sites are inspected for storm water runoff quality at least weekly regardless of size or priority level.		

C.6.e.iii.1.d ▶ Construction Activities Storm Water Violations		
BMP Category	Number of Violations⁵¹ excluding Verbal Warnings	% of Total Violations⁵²
Erosion Control	1	33
Run-on and Run-off Control	1	33
Sediment Control	1	33
Active Treatment Systems	0	0
Good Site Management	0	0
Non Stormwater Management	0	0
Total⁵³	3	100%

⁵¹Count one violation in a category for each site and inspection regardless of how many violations/problems occurred in the BMP category. For example, if during one inspection at a site, there are 2 erosion control violations, only 1 violation would be counted for this table.

⁵²Percentage calculated as number of violations in each category divided by total number of violations in all six categories.

⁵³The total number of violations may count more than one violation per inspection, since some inspections may result in violations in more than one category. For example, during one inspection of a site, there may have been both an erosion control violation and a sediment control violation. For this reason, the total number of violations in this table may not match the total number of enforcement actions reported in Table C6.e.iii.1.e.

C.6.e.iii.1.e ▶ Construction Related Storm Water Enforcement Actions			
	Enforcement Action (as listed in ERP) ⁵⁴	Number Enforcement Actions Issued	% Enforcement Actions Issued ⁵⁵
Level 1 ⁵⁶	Verbal Warning	1	100
Level 2		0	0
Level 3		0	0
Level 4		0	0
Total		1	100%

C.6.e.iii.1.f, g ▶ Illicit Discharges		Number
Number of illicit discharges, actual and those inferred through evidence at high priority sites and sites that disturb 1 acre or more of land (C.6.e.iii.1.f)		1
Number of sites with discharges, actual and those inferred through evidence at high priority sites and sites that disturb 1 acre or more of land (C.6.e.iii.1.g)		1

C.6.e.iii.1.h,i ▶ Violation Correction Times		
	Number	Percent
Violations (excluding verbal warnings) fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii.1.h)	N/A	%⁵⁷
Violations (excluding verbal warnings) not fully corrected within 30 days after violations are discovered (C.6.e.iii.1.i)	N/A	%⁵⁸
Total number of violations (excluding verbal warnings) for the reporting year⁵⁹	0	100%
Comments:		

⁵⁴Agencies should list the specific enforcement actions as defined in their ERPs.

⁵⁵Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

⁵⁶For example, Enforcement Level 1 may be Verbal Warning.

⁵⁷Calculated as number of violations fully corrected in a timely period after the violations are discovered divided by the total number of violations for the reporting year.

⁵⁸Calculated as number of violations not fully corrected within 30 days after the violations are discovered divided by the total number of violations for the reporting year.

⁵⁹The total number of violations reported in the table of Violation Correction Times equals the number of initial enforcement actions. This assumes one violation is issued for several problems during an inspection at a site. The total number of violations in the table of Violation Correction Times may not equal the total number of enforcement actions because one violation issued at a site may have a second enforcement action for the same violation at the next inspection if it is not corrected.

C.6.e.iii.(2) ► Evaluation of Inspection Data

Describe your evaluation of the tracking data and data summaries and provide information on the evaluation results (e.g., data trends, typical BMP performance issues, comparisons to previous years, etc.).

Description:

The inspection data we acquire from our data base is not in the same format as requested in the annual report form. As a result a certain level of interpolation is necessary.

C.6.e.iii.(2) ► Evaluation of Inspection Program Effectiveness

Describe what appear to be your program’s strengths and weaknesses, and identify needed improvements, including education and outreach.

Description:

The City of Brentwood’s strengths lie in our proactive approach to training, education and public outreach. Additionally, our construction inspectors are out on all active construction projects on a daily basis and are trained to be observant of all necessary stormwater BMP’s while travelling through every site. While these inspections occur daily, they are not commonly documented any more frequently than weekly, during storm events or when non-compliances occur. Improvements may include the need for additional stormwater enforcement staff who currently concentrate on general code violations. Current staffing levels have necessitated diversification of duties as dictated by management priorities. As the City’s database was developed several years prior to adoption of the MRP input category modifications need to be implemented to minimize data interpolation when summarizing MRP reporting data.

The City of Brentwood participated in the CCCWP’s Development Committee.

Refer to the C.6 Construction Site Control section of CCCWP’s FY 14-15 Annual Report for a description of activities at the countywide or regional level.

C.6.f ► Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
C.3 LID Workshop	6/12/15	Construction Inspection of C.3 Facilities	2	50%

Section 7 – Provision C.7. Public Information and Outreach

C.7.b.ii.1 ▶ Advertising Campaign

Summarize advertising efforts. Include details such as messages, creative developed, and outreach media used. The detailed advertising report may be included as an attachment. If advertising is being done by participation in a countywide or regional program, refer to the separate countywide or regional Annual Report.

Summary:

Refer to the CCCWP's Annual Report for a complete review of advertising efforts conducted on behalf of all Permittees.

C.7.b.iii.1 ▶ Pre-Campaign Survey

(For the Annual Report following the pre-campaign survey) Summarize survey information such as sample size, type of survey (telephone survey, interviews etc.). Attach a survey report that includes the following information. If survey was done regionally, refer to a regional submittal that contains the following information:

Refer to Section C.7 in the CCCWP's FY 14/15 Annual Report for complete details on the pre-campaign survey conducted for the CCCWP's Pesticides Campaign.

Place an **X** in the appropriate box below:

<input type="checkbox"/>	Survey report attached
<input checked="" type="checkbox"/>	Reference to regional submittal:

C.7.b.iii.2 ▶ Post-Campaign Survey

(For the Annual Report following the post-campaign survey) Discuss the campaigns and the measureable changes in awareness and behavior achieved. Provide an update of outreach strategies based on the survey results. If survey was done regionally, refer to a regional submittal that contains the following information:

Refer to Section C.7 in the CCCWP's FY 14/15 Annual Report for complete details on the post-campaign survey conducted for the CCCWP's Pesticides Campaign.

Place an **X** in the appropriate box below:

<input type="checkbox"/>	Survey report attached
<input checked="" type="checkbox"/>	Reference to regional submittal:

C.7.c ► Media Relations

Summarize the media relations effort. Include the following details for each media pitch in the space below, AND/OR refer to a regional report that includes these details:

- Topic and content of pitch
- Medium (TV, radio, print, online)
- Date of publication/broadcast

Summary:

The following separate report developed by BASMAA summarizes media relations efforts conducted during FY 14-15:

- **BASMAA Media Relations Final Report FY 14-15**

This report and any other media relations efforts conducted countywide is included within Section C.7 of the CCCWP's FY 14-15 Annual Report."

Local Media Relations:

- **Brentwood Connection Newsletter published and mailed to residents 3 times per year.**
- **Brentwood Press weekly newspaper delivered to all Brentwood residents highlighting events such as the annual Marsh Creek Cleanup, Brentwood Cornfest and multiple outreach events hosted by the Friends of Marsh Creek and REI.**
- **Yearly Solid Waste Service Guide mailed to all City of Brentwood Solid Waste customers.**
- **Park and Recreation Activities Guide mailed out 3 times per year to all City of Brentwood residents**

C.7.d ► Stormwater Point of Contact

Summary of any changes made during FY 14-15:

No Change

C.7.e ► Public Outreach Events

Describe general approach to event selection. Provide a list of outreach materials and giveaways distributed.

Use the following table for reporting and evaluating public outreach events

Event Details	Description (messages, audience)	Evaluation of Effectiveness
Provide event name, date, and location. Indicate if event is local, countywide or regional.	Identify type of event (e.g., school fair, farmers market etc.), type of audience (school children, gardeners, homeowners etc.) and outreach messages (e.g., Enviroscene presentation, pesticides, stormwater awareness)	Provide general staff feedback on the event (e.g., success at reaching a broad spectrum of the community, well attended, good opportunity to talk to gardeners etc.). Provide other details such as: <ul style="list-style-type: none"> • Estimated overall attendance at the event.

		<ul style="list-style-type: none"> • Number of people that visited the booth, comparison with previous years • Number of brochures and giveaways distributed • Results of any spot surveys conducted
"Bringing Back the Natives"	Garden Tours. Refer to the CCCWP's C.7 Public Information and Outreach section for a full description of the event/activity.	Refer to the CCCWP's C.7 Public Information and Outreach section for an evaluation of effectiveness.
"Our Water Our World"	Includes Tabling/Outreach Events at Stores. Refer to the CCCWP's C.7 Public Information and Outreach section for a full description of the event/activity.	Refer to the CCCWP's C.7 Public Information and Outreach section for an evaluation of effectiveness.
Marsh Creek Clean-Up Day. September 21, 2014	Joint participation with The Friends of Marsh Creek and City Staff to pick up trash along Marsh Creek. Staff also provided dumpsters and hauled away trash.	Local community residents and groups participated. A total of 4.24 tons of trash/recyclables removed. 400 volunteers
Hot Spot Assessment along Marsh Creek. September 17, 2014. Local.	A local high school assisted City staff to pick up, characterize and assess trash at two Hot Spots along Marsh Creek. The Friends of Marsh Creek Watershed coordinated the volunteers and helped secure the County Flood Control permit and indemnification/Insurance details.	10 student/teacher volunteers from Independence High School participated. Assessment of the City's two Hot Spots helps to monitor the effectiveness of trash reduction control measures. 110 CF of trash was removed.
Annual City of Brentwood Public Works Open House. May 19, 2015. Primary participants include BUSD 3rd grade classes as well as the general public	Open house for public and 3 rd graders. Stormwater Booth with Demonstration of County Watershed Model including student involvement in creating and identifying sources and destination of mock pollution. Discussions on what is and is not allowed to go down the storm drain. Completion of a multiple choice quiz. CWP embossed pencils and rulers were handed out.	Total number reached 1100 including 900 students and 200 teachers, chaperones and public.

C.7.f. ► Watershed Stewardship Collaborative Efforts

Summarize watershed stewardship collaborative efforts and/or refer to a regional report that provides details. Describe the level of effort and support given (e.g., funding only, active participation etc.). State efforts undertaken and the results of these efforts. If this activity is done regionally refer to a regional report.

Evaluate effectiveness by describing the following:

- Efforts undertaken
- Major accomplishments

Summary:

Regional Efforts

- Program participation on the Contra Costa Watershed Forum
- Green Business Program
- Website: CCCleanWater.org Community Calendar

Refer to the CCCWP’s C.7 Public Information and Outreach section for a full description of the event/activity and an evaluation of effectiveness.

Local Efforts

- Joint participation with The Friends of Marsh Creek in the annual Marsh Creek Clean-up Day. Staff volunteered to help pick up trash along Marsh Creek. Staff also provided dumpsters and hauling away trash. 4.24 tons of trash/recyclables was removed with 400 volunteers (included below Hot Spot event).
- A local school assisted City staff to pick up and characterize trash at the two Hot Spots along Marsh Creek. The Friends of Marsh Creek Watershed coordinated the volunteers and helped secure the County Flood Control permit and indemnification/Insurance details.

C.7.g. ► Citizen Involvement Events

List the types of events conducted (e.g., creek clean up, storm drain inlet marking, native gardening etc.). Use the following table for reporting and evaluating citizen involvement events.

Event Details	Description	Evaluation of effectiveness
Provide event name, date, and location. Indicate if event is local, countywide or regional	Describe activity (e.g., creek clean-up, storm drain marking etc.)	Provide general staff feedback on the event. Provide other evaluation details such as: <ul style="list-style-type: none"> • Number of participants. Any change in participation from previous years. • Distance of creek or water body cleaned • Quantity of trash/recyclables collected (weight or volume).

		<ul style="list-style-type: none"> • Number of inlets marked. • Data trends
2014 Community Watershed Stewardship. Regional.	Grant Program. Refer to the CCCWP's C.7 Public Information and Outreach section for a full description of the event/activity.	Refer to the CCCWP's C.7 Public Information and Outreach section for an evaluation of effectiveness.
Website: CCCleanWater.org. Countywide.	Community Calendar. Refer to the CCCWP's C.7 Public Information and Outreach section for a full description of the event/activity.	Refer to the CCCWP's C.7 Public Information and Outreach section for an evaluation of effectiveness.
Website: MyGreenGarden.org Regional.	Sharing local tips for a beautiful garden. Refer to the CCCWP's C.7 Public Information and Outreach section for a full description of the event/activity.	Refer to the CCCWP's C.7 Public Information and Outreach section for an evaluation of effectiveness.
Marsh Creek Clean-Up Day. September 21, 2014	Joint participation with The Friends of Marsh Creek and City Staff to pick up trash along Marsh Creek. Staff also provided dumpsters and hauled away trash.	Local community residents and groups participated. A total of 4.24 tons of trash/recyclables removed. 400 volunteers
Hot Spot Assessment along Marsh Creek. September 17, 2014. Local.	A local high school assisted City staff to pick up, characterize and assess trash at two Hot Spots along Marsh Creek. The Friends of Marsh Creek Watershed coordinated the volunteers and helped secure the County Flood Control permit and indemnification/Insurance details.	10 student/teacher volunteers from Independence High School participated. Assessment of the City's two Hot Spots helps to monitor the effectiveness of trash reduction control measures. 110 CF of trash was removed.

C.7.h. ► School-Age Children Outreach

Summarize school-age children outreach programs implemented. A detailed report may be included as an attachment. Use the following table for reporting school-age children outreach efforts.

Program Details	Focus & Short Description	Number of Students/Teachers reached	Evaluation of Effectiveness
Provide the following information: Name Grade or level (elementary/ middle/ high)	Brief description, messages, methods of outreach used	Provide number or participants	Provide agency staff feedback. Report any other evaluation methods used (quiz, teacher feedback etc.). Attach evaluation summary if applicable.

<p>"Be Classy Not Trashy"</p>	<p>Youth Outreach Litter Campaign. Refer to the CCCWP's C.7 Public Information and Outreach section for a full description of the event/activity.</p>		<p>Refer to the CCCWP's C.7 Public Information and Outreach section for an evaluation of effectiveness.</p>
<p>Mr. Funnelhead School</p>	<p>City/County Events and TV adds. Refer to the CCCWP's C.7 Public Information and Outreach section for a full description of the event/activity.</p>		<p>Refer to the CCCWP's C.7 Public Information and Outreach section for an evaluation of effectiveness.</p>
<p>Annual City of Brentwood Public Works Open House. May 19, 2015. Primary participants include BUSD 3rd grade classes as well as the general public</p>	<p>Open house for public and 3rd graders from Brentwood Union School District. Stormwater Booth with Demonstration of County Watershed Model including student involvement in creating and identifying sources and destination of mock pollution. Discussions on what is and is not allowed to go down the storm drain. Completion of a multiple choice quiz. Clean Water Program embossed pencils and rulers were handed out. Other activities included: Equipment, informational booths and demonstrations. Educational scavenger hunt. Backhoe competition event. Ecological Entertainment – recycling, water conservation and wastewater education. GIS – locate your street interactive game. Equipment displays. Water source to tap demonstration. Water Conservation & water meter reading. Camera Truck/Jetting demonstration. Water quality Laboratory demonstrations.</p>	<p>Total number reached 1100 including 900 students and 200 teachers, chaperones and public.</p>	<p>A questionnaire was provided to each student and the answers were available from the information provided at each booth. Informational giveaways such as pencils, stickers and small toys were provided to students at most booths</p>

	<p>Refuse truck with recycling information. Fleet shop w/refuse truck on portable jack display.</p>		
<p>Grant funded Environmental assemblies for 5th grade classes in Brentwood Union School District</p>	<p>45 minute assembly focusing on:</p> <ul style="list-style-type: none"> • Reducing waste by buying and using less • How to properly recycle at home and school • What natural resources are and how we can protect them • How to conserve, protect, and respect water • How water gets from the source to Brentwood home and schools • Basic principles of Ecology and the interconnectedness of life on Earth <p>Wastewater – what not to put down the drain</p>	<p>Total number reached 950 students and includes teachers.</p>	<p>Teachers and school administrative staff have stated how they and the students now have a better understanding of recycling, water conservation, and what can go down the drain. The School Recycling program continues to be productive with a recycling load contamination rate of less than 1%. Keeping 126.31 tons of recyclable materials from the land fill and potential pollution.</p>

Section 8 - Provision C.8 Water Quality Monitoring

C.8 ► Water Quality Monitoring

State below if information is reported in a separate regional report. Municipalities can also describe below any Water Quality Monitoring activities in which they participate directly, e.g. participation in RMP workgroups, fieldwork within their jurisdictions, etc.

Summary

During FY 14-15, we contributed through the CCCWP to the BASMAA Regional Monitoring Coalition (RMC). In addition, we contributed financially to the Regional Monitoring Program for Water Quality in the San Francisco Estuary (RMP) and were represented at RMP committees and work groups. Monitoring efforts and results are documented in a separate report submitted March 15 of each year, as required in Provision C.8. For additional information on monitoring activities conducted by the CCCWP, BASMAA RMC and the RMP, see the C.8 Water Quality Monitoring section of the Program's FY 14-15 Annual Report and the Urban Creeks Monitoring Report submitted on March 15, 2015.

Section 9 – Provision C.9 Pesticides Toxicity Controls

C.9.b ► Implement IPM Policy or Ordinance

Report implementation of IPM BMPs by showing trends in quantities and types of pesticides used, and suggest reasons for increases in use of pesticides that threaten water quality, specifically organophosphates, pyrethroids, carbaryl, and fipronil. A separate report can be attached as evidence of your implementation. **Guidance: List only quantities of organophosphates, pyrethroids, carbaryl and fipronil that are used in a manner that threatens water quality (i.e., are used outdoors and may come in contact with stormwater.)** Footnote #61 provides the list of active ingredients that need to be reported under the pyrethroids class of pesticides.

Trends in Quantities and Types of Pesticides Used⁶⁰

Pesticide Category and Specific Pesticide Used	Amount ⁶¹					
	FY 09-10	FY 10-11	FY 11-12	FY 12-13	FY 13-14	FY 14-15
Organophosphates						
Orthene TIO		0	10 ounces	7.5 ounces	5.5 ounces	0
Product or Pesticide Type B						
Pyrethroids						
Bifenthrin		1 gallon	0	0	0	0
Cyfluthrin		6 ounces	0	0	0	0
Carbaryl		0	0	0	0	0
Fipronil		20 ounces	0	0	0	0

C.9.c ► Train Municipal Employees

Enter the number of employees that applied or used pesticides (including herbicides) within the scope of their duties this reporting year.	12
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within the last 3 years.	12
Enter the percentage of municipal employees who apply pesticides who have received training in the IPM policy and IPM standard operating procedures within the last three years.	100

⁶⁰Includes all municipal structural and landscape pesticide usage by employees and contractors.

⁶¹Weight or volume of the product or preferably its active ingredient, using same units for the product each year. The active ingredients in any pesticide are listed on the label. The list of active ingredients that need to be reported in the pyrethroids class includes: allethrin, bifenthrin, beta-cyfluthrin, bioallethrin, cyfluthrin, cypermethrin, cyphenothrin, deltamethrin, esfenvalerate, etofenprox, fenpropathrin, gamma-cyhalothrin, imiprothrin, lambda-cyhalothrin, metofluthrin, permethrin, phenothrin, prallethrin, resmethrin, sumithrin (d-phenothrin), tau-fluvalinate, tefluthrin, tetramethrin, tralomethrin, cis-permethrin, and zeta-cypermethrin.

C.9.d ▶ Require Contractors to Implement IPM			
Did your municipality contract with any pesticide service provider in the reporting year?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, attach one of the following:			
<input type="checkbox"/>	Contract specifications that require adherence to your IPM policy and standard operating procedures, OR		
<input type="checkbox"/>	Copy(ies) of the contractors' IPM certification(s) or equivalent, OR		
<input checked="" type="checkbox"/>	Equivalent documentation.		
If Not attached , explain: See attached contractor IPM policies			

C.9.e ▶ Track and Participate in Relevant Regulatory Processes
Summarize participation efforts, information submitted, and how regulatory actions were affected OR reference a regional report that summarizes regional participation efforts, information submitted, and how regulatory actions were affected.
Summary: During FY 14-15, we participated in regulatory processes related to pesticides through contributions to the CCCWP, BASMAA and CASQA. For additional information, see the Regional Report submitted by BASMAA on behalf of all MRP Permittees.

C.9.f ▶ Interface with County Agricultural Commissioners			
Did your municipal staff observe any improper pesticide usage or evidence of improper usage (e.g., pesticides in storm drain systems, along street curbs, or in receiving waters) during this fiscal year?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, provide a summary of improper pesticide usage reported to the County Agricultural Commissioner and follow-up actions taken to correct any violations. A separate report can be attached as your summary.			

C.9.h.ii ▶ Public Outreach: Point of Purchase
Provide a summary of public outreach at point of purchase, and any measurable awareness and behavior changes resulting from outreach (here or in a separate report); OR reference a report of a regional effort for public outreach in which your agency participates.
Summary: See the C.9 Pesticides Toxicity Control section of the CCCWP's FY 14-15 Annual Report for information on point of purchase public outreach conducted countywide and regionally.

C.9.h.vi ► Public Outreach: Pest Control Operators

Provide a summary of public outreach to pest control operators and landscapers and reduced pesticide use (here or in a separate report); **OR** reference a report of a regional effort for outreach to pest control operators and landscapers in which your agency participates.

Summary:

See the C.9 Pesticides Toxicity Control section of CCCWP's FY 14-15 Annual Report for a summary of our participation in and contributions towards countywide and regional public outreach to pest control operators and landscapers to reduce pesticide use.

Section 10 - Provision C.10 Trash Load Reduction

C.10.a.iii ► Minimum Full Trash Capture

Provide the following:

- 1) Total number and types of full capture devices (publicly and privately-owned) installed to-date;
- 2) Total land area (acres) and land areas within each trash generation category (i.e., very high, high, moderate and low) treated by full capture devices (or other types of devices for non-population based Permittees); and, compare with the total required in the permit.
- 3) A narrative summary of maintenance activities implemented for each device, group of devices, or device type, including descriptions of typical maintenance frequencies and issues associated with maintaining these devices. Describe, in particular, any devices that have trash or debris overflowed, bypassed or are not functioning properly in any other manner. Describe corrective actions.

Type of Device	# of Devices	Acres Treated in FY 14-15 by Trash Generation Category				
		Low	Moderate	High	Very High	Total
Gross Solids Removal Device (GSRD) StormFlo Screen (72" Interceptor)	1	297				297
Hydrodynamic Separators	79	833	10			843
Bio-Retention Facilities	15	160				160
Inlet Cartridge Filters	15 Locations	3				3
Total for all Types		1293	10			1303
Required by Permit						64

Maintenance Summary (Describe, in particular, any devices that have trash or debris overflowed, bypassed or are not functioning properly in any other manner. Describe corrective actions).
The City owned FCD intercepting a 72" storm drain trunk line must be cleaned out by City Operations crews at least four times per year due to leaves clogging the screens. When this happens, drainage bypasses the screens and spills over the weir.

C.10.b.iii ► Trash Hot Spot Assessment

Provide the volume of material removed during each MRP-required Trash Hot Spot cleanup during each fiscal year, and the dominant types of trash (e.g., glass, plastics, paper) removed and their sources in FY 2014-15 to the extent possible. Also, provide additional information on creek cleanups conducted beyond those required that are.

Trash Hot Spot	FY 14-15 Cleanup Date(s)	Volume of Trash Removed (cubic yards)					Dominant Type(s) of Trash in FY 2014-15	Trash Sources in FY 2014-15 (where possible)
		FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15		
THS #1	9/17/2014	2.0	1.11	8.30	3.70	3.33 CY	Plastic bags, food/candy wrappers, beverage bottles, soft drink cups, Styrofoam, shopping carts (several found every year)	Storm drain outfall primarily collected from downtown
THS #2	9/17/2014	0.33	0.19	0.30	2.26	0.76 CY	Plastic bags, food/candy wrappers, beverage bottles, soft drink cups, Styrofoam	Storm drain outfall collected from subdivisions and discarded from adjacent trail

Additional Receiving Water Cleanups – If claimed as load reductions described in C.10.d – part C, describe the number and frequency of receiving water cleanups conducted in addition to those reported above. Include locations, cleanup dates, and the total volume of trash removed. Describe the overall plan, if any, associated with these additional cleanups if meant to change the trash condition of certain reaches of creeks or shorelines.

C.10.c ► Long-Term Trash Load Reduction Plan

Provide descriptions of significant revisions made to your Long-term Trash Load Reduction Plan submitted to the Water Board in February 2014. Describe significant changes made to primary or secondary trash management areas (TMA), trash generation maps, control measures, or time schedules identified in your plan

Description of Significant Revision	Associated TMA
N/A	

C.10.d ► PART A - Trash Control Measure Implementation and Assessment (Jurisdictional-wide Actions)

Provide a description of each jurisdictional-wide trash control measure implemented to-date. Identify the dominant trash source(s) and dominant type(s) of trash addressed by each control measure. For each jurisdictional-wide measure, identify the trash assessment method(s) used to demonstrate on-going reductions, summarize the results of the assessment(s), and estimate the associated reduction of trash within your jurisdictional area.

Control Measure	Summary Description of Control Measure & Dominant Trash Sources and Types	Assessment Method(s)	Summary of Assessment Results To-date	Estimated % Trash Reduced
Anti-littering and Illegal Dumping Enforcement	Enforcement on Brentwood Blvd now enabled through jurisdictional dedication of previously designated Highway 4 from the State to the City within the past two years. The Brentwood Police and Code Enforcement Departments are now able to legally track down and cite violators along this corridor.	Track number of code enforcement cases along this higher generation corridor.	An initial increase in code enforcement cases along this corridor would logically result. However, more time is needed to compare results. A 2% reduction has been assigned based on best professional judgment.	2
Public Education and Outreach Program	Annual Public Education and Outreach efforts are conducted at the City's various events, including Public Works open house, Marsh Creek clean-up day and Hot Spot assessments at two locations in Marsh Creek. All trash types are targeted.	Inspections, field monitoring and hot spot assessments.	As trash pick-up volumes vary greatly from year to year the only conclusion that can be made is that the time required for creek trash pick-ups has declined. This is perhaps due to bigger items being found which increase the total volume, as compared to fewer smaller items such as plastic bags which require more rummaging in the vegetation along the banks. A 2% reduction has been assigned based on best professional judgment.	2

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)

Complete the following trash control measure implementation and assessment summary for each primary trash management area (TMA) identified in your Long-term Plan. Include the following information:

- Identify the total jurisdictional area and the % of that area that generated very high (VH), high (H), moderate (M), or low (L) levels of trash in 2009, as depicted on trash generation maps;
- Identify the dominant trash source(s) and dominant type(s) of trash addressed or to-be addressed in the TMA;
- Provide the area currently treated by full capture devices, the quantity and type of devices installed to-date, and the % and acres of jurisdictional area in very high (VH), high (H), moderate (M), and low (L) generation categories that are currently treated by full capture devices in the TMA;
- Summarize control measures other than full capture devices implemented to-date, distinguishing between implementation that began pre- and post-MRP effective date. If not implemented in the entire TMA, describe generation category targeted and % of TMA addressed;
- Provide the acres of jurisdictional area in very high (VH), high (H), moderate (M), and low (L) generation categories in areas associated with actions other than full capture devices in the TMA;
- Describe the methods used to evaluate the effectiveness of control measures other than full capture devices, and any assessment results to-date. If the method was not implemented in the entire TMA, describe generation category targeted and %of TMA addressed.
- Provide the acres in VH, H, M or L generation categories after accounting for reduction associated with control measures other than full capture devices;
- Provide the acres in VH, H, M or L generation categories after accounting for reductions associated with ALL control measures (i.e., full capture and other actions) implemented to-date in the TMA
- Provide an estimate of the % of trash reduced in the TMA as a result of ALL control measures implemented to-date in the TMA. using the following formula:

$$\% \text{ Reduction} = 100 [(12A_{VH(2009)} + 4A_{H(2009)} + A_{M(2009)}) - (12A_{VH} + 4A_H + A_M)] / (12A_{VH2009} + 4A_{H2009} + A_{M2009})$$

where:

$A_{VH(2009)}$	=	total amount of the 2009 very high trash generation category in jurisdictional area
$A_{H(2009)}$	=	total amount of the 2009 high trash generation category in jurisdictional area
$A_{M(2009)}$	=	total amount of the 2009 moderate trash generation category in jurisdictional area
A_{VH}	=	total amount of very high trash generation category in jurisdictional area in the reporting year
A_H	=	total amount of high trash generation category in jurisdictional area in the reporting year
A_M	=	total amount of moderate trash generation category in jurisdictional area in the reporting year
12	=	Very High to Moderate weighing ratio
4	=	High to Moderate weighing ratio
100	=	fraction to percentage conversion factor

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)									
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		Area (Acres) in Each Trash Generation Category				
					VH	H	M	L	
1	142	Automobile/Pedestrian generated litter	Plastic water bottles, single use paper/plastic fast food bags, Styrofoam containers & cups	Baseline Generation Areas (2009)	0	9	36	96	
Full Capture Devices	Area Treated by Full Trash Capture Devices (Acres)	Quantity and Type of Full Trash Capture Devices			Area Treated by Full Capture Devices	0	0	0	0
	N/A	N/A							
Actions other than Full Capture Devices	Summary Description of Other Actions Implemented in the TMA Since MRP Adoption			Area <u>Not</u> Treated by Full Capture Devices	0	9	36	96	
	<ul style="list-style-type: none"> Enhanced street sweeping enabled by jurisdictional land transfer of Brentwood Blvd. from the State to the City of Brentwood. Anti-littering and Illegal Dumping Enforcement. Public Education and Outreach Programs Targeted at Trash Reduction and Implemented post-MRP Adoption Construction North Brentwood Blvd Beautification project with a landscape median and lane widening. Maintenance of this landscaping will ensure frequent trash pick-up. Completion of new City owned and operated solid waste transfer station. This fully enclosed facility allows trash to be dropped to waiting transfer trucks staged on the bottom level. The pre-existing outdoor facility was exposed to wind and water elements with a high susceptibility to carry trash off-site. 								
	Assessment Methods for Control Measures Other than Full Capture Devices								
	<ul style="list-style-type: none"> Marsh Creek Hot Spot assessments. Track frequency of landscape maintenance and perform inspections to assess effectiveness in reducing trash along this area. 								
	Summary of Assessment Results								
Using the on-land visual assessment protocol a total of 43 acres were assessed in this TMA that have Moderate, High, or Very High generation rates. Of the areas assessed 43 acres were assessed as Low, 0 acres were assessed as Moderate, 0 acres were assessed as High, and 0 acres were assessed as Very High.			Area after Accounting for Other Actions (based on assessment results)	0	0	2	139		
Area After Taking into Account Full Capture Devices AND Other Actions					0	0	2	139	
Estimated % Trash Reduction in this TMA					96%				

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types	Area (Acres) in Each Trash Generation Category				
					VH	H	M	L
2	38	Automobile/Pedestrian generated litter	Plastic water bottles, single use paper/plastic fast food bags, Styrofoam containers & cups	Baseline Generation Areas (2009)	0	9	38	0
Full Capture Devices	Area Treated by Full Trash Capture Devices (Acres)	Quantity and Type of Full Trash Capture Devices		Area Treated by Full Capture Devices	0	0	0	0
	N/A	N/A						
Actions other than Full Capture Devices	Summary Description of Other Actions Implemented in the TMA Since MRP Adoption			Area <u>Not</u> Treated by Full Capture Devices	0	9	38	0
	<ul style="list-style-type: none"> Enhanced street sweeping enabled by jurisdictional land transfer of Brentwood Blvd. from the State to the City of Brentwood. Anti-littering and Illegal Dumping Enforcement 			Area after Accounting for Other Actions (based on assessment results)	0	0	16	23
	Assessment Methods for Control Measures Other than Full Capture Devices							
	<ul style="list-style-type: none"> Marsh Creek Hot Spot assessments. Track frequency of landscape maintenance and perform inspections to assess effectiveness in reducing trash along this area. 							
	Summary of Assessment Results							
Using the on-land visual assessment protocol a total of 23 acres were assessed in this TMA that have Moderate, High, or Very High generation rates. Of the areas assessed 23 acres were assessed as Low, 0 acres were assessed as Moderate, 0 acres were assessed as High, and 0 acres were assessed as Very High.								
Area After Taking into Account Full Capture Devices AND Other Actions					0	0	16	23
Estimated % Trash Reduction in this TMA					59%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		Area (Acres) in Each Trash Generation Category			
					VH	H	M	L
3	106	Automobile/Pedestrian generated litter	Plastic water bottles, single use paper/plastic fast food bags, Styrofoam containers & cups	Baseline Generation Areas (2009)	0	9	85	12
Full Capture Devices	Area Treated by Full Trash Capture Devices (Acres)	Quantity and Type of Full Trash Capture Devices		Area Treated by Full Capture Devices	0	0	0	5
	5	This TMA has: 2 Hydrodynamic Separators.						
Actions other than Full Capture Devices	Summary Description of Other Actions Implemented in the TMA Since MRP Adoption			Area <u>Not</u> Treated by Full Capture Devices	0	9	85	7
	<ul style="list-style-type: none"> Enhanced street sweeping enabled by jurisdictional land transfer of Brentwood Blvd. from the State to the City of Brentwood. Anti-littering and Illegal Dumping Enforcement 			Area after Accounting for Other Actions (based on assessment results)	0	9	85	7
	Assessment Methods for Control Measures Other than Full Capture Devices							
	<ul style="list-style-type: none"> Marsh Creek Hot Spot assessments. Track frequency of landscape maintenance and perform inspections to assess effectiveness in reducing trash along this area. 							
	Summary of Assessment Results							
	No measureable improvement.							
Area After Taking into Account Full Capture Devices AND Other Actions					0	9	85	12
Estimated % Trash Reduction in this TMA					0%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		Area (Acres) in Each Trash Generation Category			
					VH	H	M	L
4	2	Automobile/Pedestrian generated litter	Plastic water bottles, single use paper/plastic fast food bags, Styrofoam containers & cups	Baseline Generation Areas (2009)	0	0	2	0
Full Capture Devices	Area Treated by Full Trash Capture Devices (Acres)	Quantity and Type of Full Trash Capture Devices		Area Treated by Full Capture Devices	0	0	0	0
	N/A	There are no full capture devices installed in this TMA.						
Actions other than Full Capture Devices	Summary Description of Other Actions Implemented in the TMA Since MRP Adoption			Area Not Treated by Full Capture Devices	0	0	2	0
	<ul style="list-style-type: none"> Enhanced street sweeping enabled by jurisdictional land transfer of Brentwood Blvd. from the State to the City of Brentwood. Anti-littering and Illegal Dumping Enforcement Inspection and outreach with property owners in TMA 			Area after Accounting for Other Actions (based on assessment results)	0	0	0	2
	Assessment Methods for Control Measures Other than Full Capture Devices							
	<ul style="list-style-type: none"> Marsh Creek Hot Spot assessments. Track frequency of landscape maintenance and perform inspections to assess effectiveness in reducing trash along this area. 							
	Summary of Assessment Results							
	Using the on-land visual assessment protocol a total of 2 acres were assessed in this TMA that have Moderate, High, or Very High generation rates. Of the areas assessed 2 acres were assessed as Low, 0 acres were assessed as Moderate, 0 acres were assessed as High, and 0 acres were assessed as Very High.							
Area After Taking into Account Full Capture Devices AND Other Actions					0	0	0	2
Estimated % Trash Reduction in this TMA					100%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		Area (Acres) in Each Trash Generation Category			
					VH	H	M	L
5	24	School Activity/Pedestrian generated litter	Plastic water bottles, single use paper/plastic fast food bags, Styrofoam containers & cups	Baseline Generation Areas (2009)	0	0	24	0
Full Capture Devices	Area Treated by Full Trash Capture Devices (Acres)	Quantity and Type of Full Trash Capture Devices		Area Treated by Full Capture Devices	0	0	0	0
	N/A	There are no full capture devices installed in this TMA.						
Actions other than Full Capture Devices	Summary Description of Other Actions Implemented in the TMA Since MRP Adoption			Area <u>Not</u> Treated by Full Capture Devices	0	0	24	0
	N/A			Area after Accounting for Other Actions (based on assessment results)	0	0	24	0
	Assessment Methods for Control Measures Other than Full Capture Devices							
	On-Land visual assessments.							
	Summary of Assessment Results							
	No measureable improvement.							
Area After Taking into Account Full Capture Devices AND Other Actions					0	0	24	0
Estimated % Trash Reduction in this TMA					0%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		Area (Acres) in Each Trash Generation Category			
					VH	H	M	L
6	3	Automobile/Pedestrian generated litter	Plastic water bottles, single use paper/plastic fast food bags, Styrofoam containers & cups	Baseline Generation Areas (2009)	0	0	0	3
Full Capture Devices	Area Treated by Full Trash Capture Devices (Acres)	Quantity and Type of Full Trash Capture Devices		Area Treated by Full Capture Devices	0	0	0	0
	N/A	This TMA is partially treated by devices within neighboring TMAs.						
Actions other than Full Capture Devices	Summary Description of Other Actions Implemented in the TMA Since MRP Adoption			Area <u>Not</u> Treated by Full Capture Devices	0	0	0	3
	This is a 100% Low trash generation TMA.			Area after Accounting for Other Actions (based on assessment results)	0	0	0	3
	Assessment Methods for Control Measures Other than Full Capture Devices							
	Marsh Creek Hot Spot assessments.							
	Summary of Assessment Results							
	See C.10.b.iii ► Trash Hot Spot Assessment							
Area After Taking into Account Full Capture Devices AND Other Actions					0	0	0	3
Estimated % Trash Reduction in this TMA					0%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		Area (Acres) in Each Trash Generation Category			
					VH	H	M	L
7	9,078	Automobile/Pedestrian generated litter	Plastic water bottles, single use paper/plastic fast food bags, Styrofoam containers & cups	Baseline Generation Areas (2009)	0	0	0	9078
Full Capture Devices	Area Treated by Full Trash Capture Devices (Acres)	Quantity and Type of Full Trash Capture Devices		Area Treated by Full Capture Devices	0	0	0	1303
	1303	See C.3.h.iv.(1) for list of full capture devices (FCD's) installed to-date						
Actions other than Full Capture Devices	Summary Description of Other Actions Implemented in the TMA Since MRP Adoption			Area <u>Not</u> Treated by Full Capture Devices	0	0	0	7775
	This is a 100% Low trash generation TMA.			Area after Accounting for Other Actions (based on assessment results)	0	0	0	7775
	Assessment Methods for Control Measures Other than Full Capture Devices							
	Marsh Creek Hot Spot assessments.							
	Summary of Assessment Results							
	No assessments were conducted in this TMA							
Area After Taking into Account Full Capture Devices AND Other Actions					0	0	0	9078
Estimated % Trash Reduction in this TMA					0%			

C.10.d ► PART C – Estimated Overall Trash Load Reduction

For Population-based Permittees, provide an estimate of the overall trash reduction percentage achieved to-date within the jurisdictional area of your municipality that generates problematic trash levels (i.e., Very High, High or Moderate trash generation). Base the estimate on the information presented in C.10.d – Parts A and B and receiving water cleanups not reported in C.10.b.iii.

Discussion of Trash Reduction Estimate (including Receiving Water Cleanups):

Significant trash reduction was achieved within TMA's 1, 2 and 4 through the following Implementation measures:

- **Enhanced street sweeping enabled by jurisdictional land transfer of Brentwood Blvd. from the State to the City of Brentwood.**
- **Anti-littering and Illegal Dumping Enforcement.**
- **Public Education and Outreach Programs Targeted at Trash Reduction and Implemented post-MRP Adoption**
- **Inspection and outreach with commercial/industrial property owners**
- **Construction North Brentwood Blvd Beautification project with a landscape median and lane widening. Maintenance of this landscaping will ensure frequent trash pick-up.**

Completion of new City owner and operated solid waste transfer station. This fully enclosed facility allows trash to be dropped to waiting transfer trucks staged on the bottom level. The pre-existing outdoor facility was exposed to wind and water elements with a high susceptibility to carry trash off-site.

Estimated % Trash Reduction due to Jurisdictional-wide Actions (as Reported in C.10.d – Part A)	0
Estimated % Trash Reduction in All TMAs due to Trash Full Capture Devices (as Reported in C.10.d. – Part B)	0
Estimated % Trash Reduction in all TMAs due to Control Measures Other than Trash Full Capture Devices in All TMAs) (as Reported in C.10.d. – Part B)	37
SubTotal for Above Actions	37
Estimated % Trash Reduction due to Receiving Water Cleanups (All TMAs)	0
Total Estimated % Trash Reduction FY 14-15	37

Section 11 - Provision C.11 Mercury Controls

C.11.a.i ► Mercury Recycling Efforts

List below or attach lists of efforts to promote, facilitate, and/or participate in collection and recycling of mercury containing devices and equipment at the consumer level (e.g., thermometers, thermostats, switches, bulbs).

C.11.a.ii ► Mercury Collection

Provide an estimate of the mass of mercury collected through these efforts, or provide a reference to a report containing this estimate.

Collection Facility. The event was located at 2201 Elkins Way Brentwood (City of Brentwood Transfer Station). The Event is open to all east county residents. Residents are required to present a valid driver license at the event. No flyer is required. The event is an annual event held the first Saturday of October and is open from 9 a.m. to 2 p.m. 75 pounds of Fluorescent Lights (assorted sizes) were collected in 2014.

Mercury Containing Device/Equipment	Total Amount of Devices Collected	Estimated Mass of Mercury Collected
Fluorescent Lamps ⁶² (linear feet)	560	560 mg
CFLs ⁶³ (each)	45	180 mg
Thermostats ⁶⁴ (each)		
Thermostats (lbs)		
Thermometers (each)		
Switches (lbs)		
HID Headlamps (each)		
Elemental Mercury (kg)		
Total Mass of Mercury Collected During FY 2014-2015:		

⁶²Only linear fluorescent lamps should be included

⁶³Only compact fluorescent lamps should be included

⁶⁴Thermostats can be reported by quantity or by pounds. Whichever unit is used, please avoid double-counting.

- C.11.b ▶ Monitor Methylmercury**
- C.11.c ▶ Pilot Projects to Investigate and Abate Mercury Sources in Drainages**
- C.11.d ▶ Pilot Projects to Evaluate and Enhance Municipal Sediment Removal and Management Practices**
- C.11.e ▶ Conduct Pilot Projects to Evaluate On-Site Stormwater Treatment via Retrofit**
- C.11.f ▶ Diversion of Dry Weather and First Flush Flows to POTWs**
- C.11.g ▶ Monitor Stormwater Mercury Pollutant Loads and Loads Reduced**
- C.11.h ▶ Fate and Transport Study of Mercury In Urban Runoff**
- C.11.i ▶ Development of a Risk Reduction Program Implemented Throughout the Region**
- C.11.j ▶ Develop Allocation Sharing Scheme with Caltrans**

State below if information is reported in a separate regional report. Municipalities that participate directly in regional activities to can provide descriptions below.

Summary

A summary of CCCWP and regional accomplishments for these sub-provisions are included within the C.11 Mercury Controls section of Program's FY 14-15 Annual Report, the Integrated Monitoring Report submitted on March 15, 2014, and the Urban Creeks Monitoring Report submitted on March 15, 2015.

Section 12 - Provision C.12 PCBs Controls

C.12.a.ii,iii ▶ Ongoing Training

(For FY 10-11 Annual Report and Each Annual Report Thereafter) List below or attach description of ongoing training development and inspections for PCB identification, including documentation and referral to appropriate regulatory agencies (e.g. county health departments, Department of Toxic Substances Control, California Department of Public Health, and the Water Board) as necessary.

Description:

See the FY 14-15 CCCWP Annual Report for a description of training provided countywide and/or regionally.

- C.12.b ▶ Conduct Pilot Projects to Evaluate Managing PCB-Containing Materials and Wastes during Building Demolition and Renovation Activities**
- C.12.c ▶ Pilot Projects to Investigate and Abate On-land Locations with Elevated PCB Concentrations**
- C.12.d ▶ Conduct Pilot Projects to Evaluate and Enhance Municipal Sediment Removal and Management Practices**
- C.12.e ▶ Conduct Pilot Projects to Evaluate On-Site Stormwater Treatment via Retrofit**
- C.12.f ▶ Diversion of Dry Weather and First Flush Flows to POTWs**
- C.12.g ▶ Monitor Stormwater PCB Pollutant Loads and Loads Reduced**
- C.12.h ▶ Fate and Transport Study of PCBs In Urban Runoff**
- C.12.i ▶ Development of a Risk Reduction Program Implemented Throughout the Region**

State below if information is reported in a separate regional report. Municipalities that participate directly in regional activities to can provide descriptions below.

Summary

A summary of CCCWP and regional accomplishments for these sub-provisions are included within the C.12 PCB Controls section of Program's FY 14-15 Annual Report, the Integrated Monitoring Report submitted March 15, 2014, and the Urban Creeks Monitoring Report submitted on March 15, 2015.

Section 13 - Provision C.13 Copper Controls

C.13.a.iii.(2) ▶ Training, Permitting and Enforcement Activities

(FY 11-12 Annual Report and each Annual Report thereafter) Provide summaries of activities implemented to manage waste generated from cleaning and treating of copper architectural features, including copper roofs, during construction and post-construction including. :

- Development of BMPs on how to manage the water during and post construction
- Requiring the use of appropriate BMPs when issuing building permits
- Educating installers and operators on appropriate BMPs
- Enforcement actions taken against noncompliance

C.13.d.iii ▶ Industrial Sources Copper Reduction Results

Based upon inspection activities conducted under Provision C.4, highlight copper reduction results achieved among the facilities identified as potential users or sources of copper, facilities inspected, and BMPs addressed.

Summary

No facilities have been identified that are potential sources of copper in the City of Brentwood.

Section 14 - Provision C.14 PBDE, Legacy Pesticides and Selenium Controls

Note: There are no reporting requirements in the FY 14-15 Annual Report for Section C.14.

Section 15 -Provision C.15 Exempted and Conditionally Exempted Discharges

C.15.b.iii.(1), C.15.b.iii.(2) ► Planned and Unplanned Discharges of Potable Water

Is your agency a water purveyor?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
If No , skip to C.15.b.vi.(2):				
If Yes , Complete the attached reporting tables or attach your own table with the same information. Provide any clarifying comments below.				
Comments:				

C.15.b.vi.(2) ► Irrigation Water, Landscape Irrigation, and Lawn or Garden Watering

<p>Provide implementation summaries of the required BMPs to promote measures that minimize runoff and pollutant loading from excess irrigation. Generally the categories are:</p> <ul style="list-style-type: none"> • Promote conservation programs • Promote outreach for less toxic pest control and landscape management • Promote use of drought tolerant and native vegetation • Promote outreach messages to encourage appropriate watering/irrigation practices • Implement Illicit Discharge Enforcement Response Plan for ongoing, large volume landscape irrigation runoff.
<p>Summary:</p> <p>The City of Brentwood through the CCCWP promote and implement several programs and measures to minimize pollutant loading from excess irrigation including, but not limited to:</p> <ul style="list-style-type: none"> • 6th Edition Stormwater C.3 Guidebook adopted by ordinance, which promotes to land development professionals landscaping designed to: 1) minimize irrigation and runoff; 2) promote infiltration of runoff where appropriate; and, 3) minimize use of fertilizers and pesticides using pest-resistant plants that are suited to site conditions (e.g., soil and climate). • Green Business Program, which promotes to businesses a variety of measures such as using drought tolerant plantings, mulching, carefully monitoring irrigation schedules and needs, and implementing Integrated Pest Management. • Our Water Our World (OWOW) Program, which promotes to consumers and the point of purchase less toxic alternatives to combating lawn and garden pests. • Bay Friendly Landscaping and Gardening Training and Certification Program, which promotes to landscapers a variety of measures designed to reduce waste and prevent stormwater pollution.

Permittee Name: City of Brentwood

In response to the Governor's 2015 Executive Order and the subsequent State Water Resource Control Board (SWRCB) drought regulations, the City adopted a Resolution at the April 28, 2015, Council meeting which requires a 35 percent potable water use reduction from the amounts used in 2013 from its water service customers, implements Stage III of the City's Water Shortage Contingency Plan and prohibits the following activities in the promotion of water conservation:

- 35% reduction in all customers use from 2013
- 40% reduction in commercial irrigation use from 2013
- No watering between 8:00 a.m. and 7:00 p.m.
- No watering within 48 hours after measurable rainfall
- No watering more than 2 days per week
- No excessive landscape runoff
- No washing a vehicle, trailer, boat without a shutoff nozzle.
- No washing paved or hardscape surfaces
- No water use for non-recirculating fountains
- No watering new home construction landscape except by drip or micro spray
- No watering ornamental turf on public street medians
- No serving drinking water except upon request in eating or drinking establishments
- No hotels/motels daily laundering of towels/linens unless requested by a guest

Promote Water Conservation Programs by offering:

- Toilet Rebates – Ended 12/31/13
- Quarterly High Use Notification Letters – Since 2006
- Water Use Surveys – Since 2006
- New Home Owner Information – Since 2010
- Weather Based Irrigation Controller Study (includes controller given to approved resident) – completed 2006
- Low Flow Showerhead distribution during Water Use Survey – Since 2010
- Water Conservation Brochure – Updated annually

Promote outreach for less toxic pest control and landscape management by:

- The City now has 2 Bay Friendly Qualified Landscape Maintenance Professionals (4/2012). One is our Water Conservation Specialist and the other is our Park/Maintenance Supervisor. Both positions promote BMPs and IPM during their interaction with home owners, businesses and with the City's Landscape Contractors.

Promote use of drought tolerant and native vegetation by:

- Offering Water Wise Gardening on the City's website
- During Water Use Surveys
- Planting in our City owned/maintained landscape

Permittee Name: City of Brentwood

Promote outreach messages to encourage appropriate watering/irrigation practices by:

- The City includes messages on billing statements promoting water conservation (12 messages per year)
 Newsletter to City Customers – Brentwood Connection – providing information on watering schedule and conservation tips (3 time per year)
- Water Conservation brochure – updated annually
- The City is working towards meeting SB77 - (goal to reduce irrigation water use by 20%) and is at 10% of the goal

Implement Illicit Discharge Enforcement Response Plan for ongoing large volume landscape irrigation runoff by:

- The City adopted the Model Water Efficient Landscape Ordinance (MWELo) in 2010 provided by the Department of Water Resources
- The City meets MWELo by adopting the water efficient landscape ordinance
- The ordinance requires new construction and rehabilitation projects to:
 - Provide a Landscape Documentation Package (certification of installation, irrigation scheduling, schedule of landscape and irrigation maintenance, landscape irrigation audit report, and soil management report.
 - Require use of maximum applied water allowance, Water Use Classification of Plants (WUCOLS), and an audit performed by a certified irrigation auditor.
 - Require the use of recycled water for irrigation systems and decorative water features unless a written exemption is granted by the local water purveyor
 - Recommend storm water management practices and increase rainwater capture and create opportunities for infiltration and/or onsite storage of rainwater
 - Provide information to owners of new homes regarding design and installing of water efficient landscapes
 - Address existing landscapes over 1 acre in size and evaluate water use and provide recommendations for reducing landscape water use

The City adopted Municipal Code Chapters 14.20 and 17.630, that state residents and businesses are to minimize spray and run off

Promote and implement through the CCCWP several programs and measures to minimize pollutant loading from excess irrigation including, but not limited to:

- 6th Edition Stormwater C.3 Guidebook adopted by ordinance, which promotes to land development professionals landscaping designed to: 1) minimize irrigation and runoff; 2) promote infiltration of runoff where appropriate; and, 3) minimize use of fertilizers and pesticides using pest-resistant plants that are suited to site conditions (e.g., soil and climate).
- Green Business Program, which promotes to businesses a variety of measures such as using drought tolerant plantings, mulching, carefully monitoring irrigation schedules and needs, and implementing Integrated Pest Management.
- Our Water Our World (OWOW) Program, which promotes to consumers and the point of purchase less toxic alternatives to combating lawn and garden pests.
- Bay Friendly Landscaping and Gardening Training and Certification Program, which promotes to landscapers a variety of measures designed to reduce waste and prevent stormwater pollution.

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System										
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity ⁶⁵ (NTU)	Implemented BMPs & Corrective Actions
See attachments C.15.b.iii.(1) 2014 and C.15.b.iii.(1) 2015										

⁶⁵Monitor the receiving water for turbidity if necessary and feasible. Include data in this column if available.

Attachment C.4.b.iii.(1) ► Potential Facilities List/C.4.b.iii.(2) ► Facilities Scheduled for Inspection

COMMERCIAL/INDUSTRIAL FACILITY INSPECTIONS

Account Number	Firm Name	Firm Address	Priority	Freq (years)	Insp. Hrs.	Follow up Hrs.	Annual Hrs.	Inspect 2014/15	To Inspect 2015/16	NOI Facility
28508	15th St Beach LLC - Beach	2540 Sand Creek Rd Ste A-5	2	3	4	4	2.67			
18704	1st Stop Gas	7935 Brentwood Blvd	2	3	4	4	2.67		X	
22571	1st Stop Wheels	7935 Brentwood Blvd	2	3	4	4	2.67		X	
28060	5 Star Wireless	5411 Lone Tree Way Ste. L-120	3	5	2	2	0.80			
21093	A&E Smog Test Only	415 Beatrice Ct Suite E	2	3	4	4	2.67		X	
29491	A1 Car Sales Inc	8010 Brentwood Blvd Suite A	2	3	4	4	2.67		X	
21307	A-1 Stop Smog Brentwood	8285 Brentwood Blvd	2	3	4	4	2.67		X	
10491	A1 Transmission Service	150 Middlefield Ct Suite D	2	3	4	4	2.67		X	
15979	ACE Painting Service Inc	700 Harvest Park Dr Suite L	3	5	2	2	0.80			
20621	Acorn II Self Storage LLC	6900 Lone Tree Way	3	5	2	2	0.80	X		
29801	Action Auto & Fleet Repair	305 Town Center Terrace Ste J	2	3	4	4	2.67		X	
21289	Advance Design Construction Inc	702 Rio Grande Ct	3	5	2	2	0.80			
25042	Aeropostale West #984	2535 Sand Creek Rd Suite 124	3	5	2	2	0.80	X		
29262	Afrique International, Inc.	470 Harvest Park Dr Ste C	3	5	2	2	0.80			
24094	Aldos Shoe Repair	5421 Lone Tree Way Suite 140	3	5	2	2	0.80			
29870	All American Sports Fan	2535 Sand Creek Rd Ste 132	3	5	2	2	0.80			
10498	All Pro Glass Inc	150 Middlefield Ct Suite A	3	5	2	2	0.80			
29212	Alpha-Omega Quality Painting	6715 Brentwood Blvd Suite B	3	5	2	2	0.80			
24915	American Eagle Outfitters #2190	2535 Sand Creek Rd Suite 140	3	5	2	2	0.80	X		
22642	America's Tire Company	5551 Lone Tree Way	2	3	4	4	2.67		X	
28806	Animal Rehabilitation & Wellness	4505 O'Hara Ave	3	5	2	2	0.80			
24759	Ann Taylor Loft #1642	2425 Sand Creek Rd Suite 136	3	5	2	2	0.80	X		
29257	Anthony's Garage Door Service	103 York St	3	5	2	2	0.80			
10783	Antioch Building Materials	2170 Elkins Way	1	1	12	10	22.00	X	X	
27833	Antique Co-Op	6675 Brentwood Suite A	3	5	2	2	0.80			
29967	Arco Am/Pm #104	2250 Balfour Rd	2	3	4	4	2.67			
22273	Redwood Apartments	7940 Brentwood Blvd	3	5	2	2	0.80	X		
15352	Asahi Nursery	2600 A Walnut Blvd	2	3	4	4	2.67			
16219	Auto Import Service	150 Middlefield Ct Suite C	2	3	4	4	2.67		X	
17641	Autobug PVL	9030 Brentwood Blvd Suite B	2	3	4	4	2.67		X	
17896	B Wood Cabinet Painting Inc	425 Beatrice Ct	2	3	4	4	2.67			
23301	Bagel Street Café	3181 Balfour Rd Ste A	2	3	4	4	2.67	X		
18213	Bailey's Building Supply - Hardware	161 Chestnut St #23	2	3	4	4	2.67			
10670	Bailey's Rental & Hardware Inc	450 Minnesota Ave	3	5	2	2	0.80			
27537	Bangkok 101 Thai Cuisine	2505 Sand Creek Rd #112	2	3	4	4	2.67	X		
4232	Baskin Robbins Ice Cream 2362	1145-D Second St	3	5	2	2	0.80	X		
24701	Bath & Body Works L L C #2077	2505 Sand Creek Rd	3	5	2	2	0.80	X		
29482	Bazin Wings-Buffalo Wild Wings	6051 Lone Tree Way	2	3	4	4	2.67			
27637	Bear Technology Inc	410 Beatrice Ct Suite C	3	5	2	2	0.80		X	
20151	Bermudez's Auto Service & Repair	415 Beatrice Ct Suite F	2	3	4	4	2.67		X	
16661	Best Cleaners	4431 Balfour Rd Suite 3D	2	3	4	4	2.67		X	
4027	Big B Lumbereria Inc	6600 Brentwood Blvd	3	5	2	2	0.80			
10238	Big O Tires #81	8040 Brentwood Blvd	2	3	4	4	2.67		X	
10674	Bill Brandt Ford Inc.	8100 Brentwood Blvd	2	3	4	4	2.67			
29135	Bindra Food Inc - Aladino's Pizza	4411 Balfour Rd Suite A	2	3	4	4	2.67			
4438	Birrieria Diaz	7876 Brentwood Blvd	2	3	4	4	2.67			
28769	BJ's Restaurant & Brewhouse	2365 Sand Creek Rd	2	3	4	4	2.67	X		
20583	Bluefin Enterprises, Inc.	5401 Lone Tree Way Ste 130	2	3	4	4	2.67	X		

COMMERCIAL/INDUSTRIAL FACILITY INSPECTIONS

Account Number	Firm Name	Firm Address	Priority	Freq (years)	Insp. Hrs.	Follow up Hrs.	Annual Hrs.	Inspect 2014/15	To Inspect 2015/16	NOI Facility
10794	Bluewater Publishing LLC	9040 Brentwood Blvd Suite B	3	5	2	2	0.80			
23391	Boards N More	306 Oak St	3	5	2	2	0.80			
20501	Brentwood & Oakley Muffler	8362 Brentwood Blvd	2	3	4	4	2.67			
10239	Brentwood Ace Hardware	8900 Brentwood Blvd Suite J	3	5	2	2	0.80			
29316	Brentwood Armory	305 Town Center Terrace Ste N	3	5	2	2	0.80			
30032	Brentwood Assisted Living Inc	1530 Fairview Ave	3	5	2	2	0.80			
10675	Brentwood Auto Parts	7881 Brentwood Blvd	3	5	2	2	0.80			
19530	Brentwood Auto Service, Inc.	427 Oak St	2	3	4	4	2.67		X	
22159	Brentwood Auto Spa Inc	6945 Lone Tree Way	2	3	4	4	2.67		X	
27152	Brentwood Bike Company	7740 Brentwood Blvd Ste B	3	5	2	2	0.80			
22502	Brentwood Café	8500 Brentwood Blvd	2	3	4	4	2.67			
20156	Brentwood Cleaners	601-A First St	2	3	4	4	2.67			
20361	Brentwood Emporium	561 First St	3	5	2	2	0.80			
27208	Brentwood F&B DBA Wedgewood	100 Summerset Dr	2	3	4	4	2.67			
15837	Brentwood Family Pet Care	4421-A Balfour Rd	3	5	2	2	0.80			
17871	Brentwood Fine Meats	3877 Walnut Blvd Unit A	3	5	2	2	0.80			
26337	Brentwood Garden Apartments	180 Sycamore Ave	3	5	2	2	0.80			
27352	Brentwood Golf Club	100 Summerset Dr	3	5	2	2	0.80			
18241	Brentwood Hickory Pit	3130 Balfour Rd Suite E	2	3	4	4	2.67	X		
25299	Brentwood Holiday On Ice	2455 Sand Creek Rd	3	5	2	2	0.80		X	
4388	Brentwood Laundromat	7870 Brentwood Blvd	2	3	4	4	2.67			
27118	Brentwood Minuteman Press	200 Sand Creek Rd Suite E	3	5	2	2	0.80			
27470	Brentwood MJ Inc - Fantasia	8065 Brentwood Blvd Suite 4	3	5	2	2	0.80			
29646	Brentwood Motor Sports	8111 Brentwood Blvd	2	3	4	4	2.67		X	
28293	Brentwood Motors	6655 Brentwood Blvd	2	3	4	4	2.67		X	
10649	Brentwood Park Apartments	160 Sycamore Ave	3	5	2	2	0.80			
22549	Brentwood Party Rentals	2610 Empire Ave	3	5	2	2	0.80			
29453	Brentwood Petroleum	7920 Brentwood Blvd	3	5	2	2	0.80			
3843	Brentwood Plumbing	22601 Marsh Creek Rd	3	5	2	2	0.80			
17725	Brentwood Press & Publishing	248 Oak St	3	5	2	2	0.80			
22337	Brentwood Reprographics Inc	3361 Walnut Blvd Suite 130	3	5	2	2	0.80			
28547	Brentwood Select Auto Sales	8040-D Brentwood Blvd	2	3	4	4	2.67			
18491	Brentwood Self Storage LP	190 Sand Creek Rd	3	5	2	2	0.80			
22198	Brentwood Service Station	2250 Balfour Rd	2	3	4	4	2.67			
20944	Brentwood Smog Express	8040 Brentwood Blvd Suite C	2	3	4	4	2.67			
21745	Brentwood Surgery Center LLC	2400 Balfour Rd Suite 320	3	5	2	2	0.80			
23886	Brentwood Tire Company	7885 Brentwood Blvd	2	3	4	4	2.67			
29810	Brentwood Town Centre Apartments	1275 Central Blvd	3	5	2	2	0.80			
30129	Brentwood Transmission & Auto	350-A Central Terrace	2	3	4	4	2.67			
10513	Brentwood Transmissions	305-A Central Terrace	2	3	4	4	2.67		XX	
10681	Brentwood Veterinary Hospital	4519 O'Hara Ave	3	5	2	2	0.80			
15684	Brentwood-Oakley Pediatrics	1191 Central Blvd Suite D	3	5	2	2	0.80			
23354	Brentwood's Co. Co. County Wine	633 First Street	3	5	2	2	0.80			
25578	Brocca Inc DBA Wingstop	6471 Lone Tree Way #303	2	3	4	4	2.67			
29058	Bumper 2 Bumber Automotive	4501 O'Hara Ave Suite H	2	3	4	4	2.67			
10799	Bunnells Cabinets	4501 O'Hara Ave Suite I	2	3	4	4	2.67			
15134	C&P Aquatics Inc	2601 Anderson Lane	3	5	2	2	0.80			
28126	Café Asia	2300 Sand Creek Rd	2	3	4	4	2.67			
22673	California Motors	7960 Brentwood Blvd Suite G	2	3	4	4	2.67		X	

COMMERCIAL/INDUSTRIAL FACILITY INSPECTIONS

Account Number	Firm Name	Firm Address	Priority	Freq (years)	Insp. Hrs.	Follow up Hrs.	Annual Hrs.	Inspect 2014/15	To Inspect 2015/16	NOI Facility
27018	California Restoration Inc	420 Beatrice Ct Suite A	3	5	2	2	0.80			
23225	Canoun Plastic Surgery	2400 Balfour Rd	3	5	2	2	0.80			
20527	Canton Garden	7840 Brentwood Blvd	2	3	4	4	2.67			
10360	Cap's Oak St Bar & Grill	144 Oak St	2	3	4	4	2.67			
	Carl's Jr.	6291 Lone Tree Way	2	3	4	4	2.67	X		
10804	Casey's Auto Body Shop	4515 O'Hara Ave	2	3	4	4	2.67			
27724	Casual City	71 Sand Creek Rd E	3	5	2	2	0.80			
29088	Caw Investments - Brake Stop	8111 Brentwood Blvd	2	3	4	4	2.67			
29550	CBT Technology, Inc.	161 Sand Creek Rd	3	5	2	2	0.80			
15068	CC Water Products Inc	380 Carrol Ct Suite D	2	3	4	4	2.67			
17346	Central Concrete Supply Co., Inc.	11911 Brentwood Blvd	2	3	4	4	2.67		X	
29968	Chaman Kabob Restaurant	5611 Lone tree Plaza	2	3	4	4	2.67	X		
23489	Chapala Mexican Restaurant	3130 Balfour Rd Suite E	2	3	4	4	2.67			
22798	Charley's Grilled Sub	6660 Lone Tree Way Suite 1	2	3	4	4	2.67			
10810	Chef Chen Restaurant	8065 Brentwood Blvd Suite 9	2	3	4	4	2.67			
20886	Chevron #1761	2371 Brentwood Blvd	2	3	4	4	2.67		X	
19806	Chevron #1762	5591 Lone Tree Way	2	3	4	4	2.67		X	
23703	Chevron USA Inc. - 303837	2371 Brentwood Blvd	2	3	4	4	2.67		X	
16192	Chevron USA Inc. - 96911	336 Oak St	2	3	4	4	2.67		X	
24528	Chico's #702	2455 Sand Creek Rd Suite 124	3	5	2	2	0.80	X		
28949	China Garden Restaurant	8610 Brentwood Blvd Suite G	2	3	4	4	2.67			
28792	Chipotle Mexican Grill	5401 Lone Tree Way Suite 100	2	3	4	4	2.67	X		
10520	Christmas of Brentwood	8425 Brentwood Blvd #A5	3	5	2	2	0.80			
22619	Chuck E Cheese's	6061 Lone Tree Way Ste A	2	3	4	4	2.67			
18068	Circle A Food Mart & Gas	8401 Lone Tree Way	2	3	4	4	2.67		X	
29873	Circle A Food Mart & Gas	8401 Lone Tree Way	2	3	4	4	2.67			
24820	Citibank	6041 Lone Tree Way	3	5	2	2	0.80		X	
27987	City Center Pharmacy	50 Eagle Rock Way Suite C	3	5	2	2	0.80			
17059	Claire's #5212	2440 Sand Creek Rd #F-11	3	5	2	2	0.80	X		
22890	Claire's #5212	6600 Lone Tree Way	3	5	2	2	0.80			
10458	Classic Awning & Canvas	6303 Brentwood Blvd	3	5	2	2	0.80			
24728	Coldwater Creek US Inc	2565 Sand Creek Rd Suite 116	3	5	2	2	0.80	X		
17487	Computers USA	7730-C Brentwood Blvd	3	5	2	2	0.80			
30073	Connie's Consignment	4550 Balfour Rd Suite F	3	5	2	2	0.80			
23400	Continental Auto Recyclers	6337 Brentwood Blvd	1	1	12	10	22.00			
20565	Continental Towing	6337 Brentwood Blvd	1	1	12	10	22.00			
23975	Cortona Park	150 Cortona Way	3	5	2	2	0.80			
23755	Coverstar Safety Inc	3877 Walnut Blvd Suite F	3	5	2	2	0.80			
27246	CR Framing	700 Harvest Park Dr Suite I	3	5	2	2	0.80			
29483	CreAsian Flavors of Vietnam	5611 Lone Tree Way Ste.#100	2	3	4	4	2.67	X		
15245	CVP Inc	9020 Brentwood Blvd Suite F	3	5	2	2	0.80			
22461	CVS Pharmacy #4283	3171 Balfour Rd	3	5	2	2	0.80	X		
15675	CVS Pharmacy #9511	1175 Second St	3	5	2	2	0.80	X		
4396	Dallas Shanks & Sons Auto Service	40 Sycamore Ave	2	3	4	4	2.67		X	
10699	Dallas Shanks Chevron	190 Griffith Lane	2	3	4	4	2.67		X	
15974	Dan Braudrick Services Inc	7900 Balfour Rd	3	5	2	2	0.80			
27291	Decsas Exterminating Inc	275 Central Terrace	3	5	2	2	0.80			
21253	Deer Ridge Golf Club	801 Foothill Dr	3	5	2	2	0.80			
24422	DeJesus Pump & Well Drilling Inc	2582 Sellers Ave	3	5	2	2	0.80			

COMMERCIAL/INDUSTRIAL FACILITY INSPECTIONS

Account Number	Firm Name	Firm Address	Priority	Freq (years)	Insp. Hrs.	Follow up Hrs.	Annual Hrs.	Inspect 2014/15	To Inspect 2015/16	NOI Facility
25120	Delia's Retail Company	2535 Sand Creek Rd Suite 128	3	5	2	2	0.80	X		
4246	Delta Auto Supply - SP Automotive	8130 Brentwood Blvd	3	5	2	2	0.80		X	
4248	Delta Fence	6901 Brentwood Blvd	3	5	2	2	0.80			
10819	Delta Pure Water Inc	41 Sand Creek Rd # A	3	5	2	2	0.80			
30102	Delta Sport Exchange	6061-F Lone Tree Way	3	5	2	2	0.80			
27125	Delta Valley Athletic Club	120 Guthrie Ln	3	5	2	2	0.80			
16395	Denham Contracting Inc	890 Camino Diablo	3	5	2	2	0.80			
21153	Diablo Neurosurgical Medical Group	2400 Balfour Rd Suite 237	3	5	2	2	0.80			
3629	Diamond Mine Mini Storage	175 Guthrie Lane	3	5	2	2	0.80			
29875	Dickey's Barbecue Pit	2500 Sand Creek Rd Suite B	2	3	4	4	2.67	X		
24857	Digger's Diner	2261 Balfour Rd Suite F	2	3	4	4	2.67	X		
28514	Dikran Deragopian DMD, MD Inc	4411 Balfour Rd Suite B	3	5	2	2	0.80			
28241	Dino's Sandwich Shop	729 First St Unit C	2	3	4	4	2.67			
29654	Discovery HVAC	8580 Brentwood Blvd	3	5	2	2	0.80			
4162	Discovery Professional Services	9030 Brentwood Blvd Suite E	3	5	2	2	0.80			
29481	Diva on a Dollar	3850 Balfour Rd Suite N	3	5	2	2	0.80			
21986	DJM Retail Inc - Lane Home Furnish	6061 Lone Tree Way Suite D	3	5	2	2	0.80			
4398	Doggie Depot	1300 Central Blvd Suite E	2	3	4	4	2.67			
29486	Dollar General Store #13586	7820 Brentwood Blvd	3	5	2	2	0.80		X	
22052	Dollar Tree #3494	51 W Sand Creek Rd	3	5	2	2	0.80		X	
25941	Donnelly's Floor Service	550 Valdry Ct Suite A3	3	5	2	2	0.80			
27492	DP Advanced Engineering Inc	200 Sand Creek Rd Suite D	3	5	2	2	0.80			
22399	Dragon City Restaurant	71 Sand Creek Rd	2	3	4	4	2.67			
25367	DSW Shoe Warehouse #29380	2555 Sand Creek Rd Bldg A	3	5	2	2	0.80	X		
28985	Dyanna's Eden Plains Nursery	2800 Empire Ave	2	3	4	4	2.67			
20279	East Bay Equities Inc.	6021 Lone Tree Way	3	5	2	2	0.80			
25318	East Bay Medical Supply	5421 Lone Tree Way Suite 150	3	5	2	2	0.80			
23490	East Bay Muscle Cars LLC	560 Valdry Ct Suite B4	2	3	4	4	2.67			
27883	East Country European Autoworks	550 Harvest Park Dr #E	2	3	4	4	2.67			
30124	Edward R Marszal Enterprises, Inc	336 Oak St	3	5	2	2	0.80			
15581	Ekman & Associates	700 Harvest Park Dr Suite C	3	5	2	2	0.80			
28843	El Camino Restaurant	6611 Brentwood Blvd	2	3	4	4	2.67			
10823	El Gallito Drive In	8540 Brentwood Blvd	2	3	4	4	2.67			
19653	El Taco Factory	6660 Lone Tree Way Ste #5	2	3	4	4	2.67			
27048	El Vaquero Restaurant	8065 Brentwood Blvd #1	2	3	4	4	2.67			
22204	Ellison Framing Inc	160B Guthrie Ln Suite 13	3	5	2	2	0.80			
10412	Enterprise Rent A Car	8130 Brentwood Blvd	2	3	4	4				
29571	Evolution Painting	7880 Brentwood Blvd	3	5	2	2	0.80			
24784	Express #2007	2545 Sand Creek Rd	3	5	2	2	0.80			
27925	Express Lounge	613 First St Suite 107	2	3	4	4	2.67			
23127	Extreme Motorsports	8445 Brentwood Blvd	2	3	4	4	2.67			
27034	Extreme Pizza	3120 Balfour Rd Ste. F	2	3	4	4	2.67	X		
20540	Famous Footware #2418	5471 Lone Tree Way	3	5	2	2	0.80			
27832	Fastenal Company	9000 Brentwood Blvd, Suite E	3	5	2	2	0.80			
	Fat Burger	2565 Sand Creek Rd., Suite G-3A	2	3	4	4	2.67	X		
28088	FD Motorsports	150 Middlefield Ct Suite G	2	3	4	4	2.67			
26761	FDRW Inc	8494 Lone Tree Way	3	5	2	2	0.80			
23159	Firestone Complete Auto Care	6840 Lone Tree Way	2	3	4	4	2.67		X	
22759	Food Maxx #480	4461 Balfour Rd	3	5	2	2	0.80	X		

COMMERCIAL/INDUSTRIAL FACILITY INSPECTIONS

Account Number	Firm Name	Firm Address	Priority	Freq (years)	Insp. Hrs.	Follow up Hrs.	Annual Hrs.	Inspect 2014/15	To Inspect 2015/16	NOI Facility
28991	Fresh & Easy Market	3141 Balfour Rd	3	5	2	2	0.80	X		
29421	Frosted!	7710 Brentwood Blvd Ste B	3	5	2	2	0.80			
24079	Futures Explored Inc	1191 Central Blvd Suite B	3	5	2	2	0.80			
17070	G Rose & Sons Glass	230 Chestnut St	3	5	2	2	0.80			
10367	G&L Brock Construction Co Inc	1240 Central Blvd	3	5	2	2	0.80			
10835	Golden Gate Petroleum	8285 Brentwood Blvd	2	3	4	4	2.67			
29288	Golf Ballin	38 West Country Club Dr Suite B	3	5	2	2	0.80			
15931	Got A Party	3981 Walnut Blvd	3	5	2	2	0.80			
21421	Got U Covered	4525 O'Hara Ave Suite C	3	5	2	2	0.80			
27519	Green Soap Inc	570 Valdry Ct C6	3	5	2	2	0.80			
17520	Groundworks Inc	421 Lone Oak Rd	2	3	4	4	2.67			
28868	Growe Inc - Menchies	2530 Sand Creek Rd Suite B2	3	5	2	2	0.80			
24893	Gymboree Retail Stores, Inc. #17	2505 Sand Creek Rd	3	5	2	2	0.80			
21142	Halt Medical Inc	131 Sand Creek Rd Suite I&J	3	5	2	2	0.80			
28869	Hampton Inn	7605 Brentwood Blvd	3	5	2	2	0.80			
26478	Happy Sushi	3101 Balfour Rd Suite A	3	5	2	2	0.80	X		
23417	Harman Huang Inc., DBA KFC #259	6371 Lone Tree Way	2	3	4	4	2.67	X		
10713	Harman Strong Brown Inc	7810 Brentwood Blvd #204	3	5	2	2	0.80			
10448	Health Hut - Barbara Guise	161 Chestnut St	3	5	2	2	0.80			
28137	Healthy Families Market	171 Sand Creek Rd Ste F	3	5	2	2	0.80			
28684	Heavenly Cheesecakes	3101 Balfour Rd Ste F	3	5	2	2	0.80	X		
4262	Henson Plumbing Inc	9020 Brentwood Blvd Suite D	3	5	2	2	0.80			
23559	His & Hers Formal Wear	625 First St	3	5	2	2	0.80			
27550	Holiday Inn Express	8820 Brentwood Blvd	3	5	2	2	0.80			
25117	Hollister #672	2505 Sand Creek Rd Suite 140	3	5	2	2	0.80	X		
18668	Home Depot #1076	5631 Lone Tree Wy	2	3	4	4	2.67	X		
16967	Home Goods #237	2460 Sand Creek Rd	3	5	2	2	0.80	X		
29823	Horizon Smog	205 Oak St	2	3	4	4	2.67			
24294	Horsetown Tack	6675 Brentwood Blvd Suite B	3	5	2	2	0.80			
21789	Hotline Construction Inc	9020 Brentwood Blvd Suite H	3	5	2	2	0.80			
15567	Hurtado's Auto Sales Inc	6300 Brentwood Blvd	2	3	4	4				
17333	In Shape City Brentwood	180 Griffith Lane	3	5	2	2	0.80	X		
19823	In-N-Out Burger #189	5581 Lone Tree Way	2	3	4	4	2.67	X		
28242	Innovative Senior Care	150 Cortona Way	3	5	2	2	0.80			
22450	Integrative Health Centre	8157 Brentwood Blvd Suite A	3	5	2	2	0.80			
10279	IRS Cleaners	41 Sand Creek Rd Suite B	2	3	4	4	2.67		X	
26840	Ivy's Boutique	8065 Brentwood Blvd #2	3	5	2	2	0.80			
27122	J Jill	2565 Sand Creek Rd Suite 108	3	5	2	2	0.80	X		
10445	J&M Krebs Enterprises - Speedy	7377 Brentwood Blvd	2	3	4	4	2.67		X	
20777	J&R Supply Inc	570 Valdry Ct Suite C11	3	5	2	2	0.80			
21271	J&S Partners Inc	2155 Elkins Way Suite H	3	5	2	2	0.80			
18797	Jack In The Box Restaurant #434	60 Technology Way	2	3	4	4	2.67			
27211	Jack In The Box Restaurant #4399	3191 Balfour Rd	2	3	4	4	2.67	X		
30158	Jalisco's Market	8335 Brentwood Blvd Suite C	3	5	2	2	0.80			
15530	Jalisco's Restaurant	8335 Brentwood Blvd	2	3	4	4	2.67			
20486	Jamba Juice #706	8630 Brentwood Blvd.	3	5	2	2	0.80			
22959	Jasper & Rachen LLC	7760-D Brentwood Blvd	3	5	2	2	0.80			
10900	Jasper & Rachen LLC	4431-E Balfour Rd	3	5	2	2	0.80			
28081	Jeffery Way Shell	6031 Lone Tree Way	2	3	4	4	2.67		X	

COMMERCIAL/INDUSTRIAL FACILITY INSPECTIONS

Account Number	Firm Name	Firm Address	Priority	Freq (years)	Insp. Hrs.	Follow up Hrs.	Annual Hrs.	Inspect 2014/15	To Inspect 2015/16	NOI Facility
22868	Jeffry Family Partnership	3291 Walnut Blvd	3	5	2	2	0.80	X		
30153	Jerry Zahn's Weed Abatement	250 Eagle Ln	3	5	2	2	0.80			
28341	Jimmy's Auto Wholesale	8175 Brentwood Blvd	2	3	4	4	2.67			
4270	Jim's Barber Shop	8530 Brentwood Blvd	3	5	2	2	0.80			
29537	JJ Auto Repair	6300 Brentwood Blvd Suite A	2	3	4	4	2.67			
18486	JJ Pump & Well Service Inc	2771 Virginia Dr	2	3	4	4	2.67			
25830	JK Market Inc	7351 Brentwood Blvd Suite G	3	5	2	2	0.80			
25326	JMJ Home Health Services	1210 Central Blvd Suite 121	3	5	2	2	0.80			
	Johnny Garlics	2505 Sand Creek Rd Unit 20	2	3	4	4	2.67	X		
23909	John's Ice Cream	6660 Lone Tree Way Suite 2	3	5	2	2	0.80	X		
24912	Jos A Bank Clothiers Inc	2455 Sand Creek Rd Suite 144	3	5	2	2	0.80	X		
21039	Justice #534	5471 Lone Tree Way Ste 100	3	5	2	2	0.80	X		
24561	Justice #957	2505 Sand Creek Rd Suite 132	3	5	2	2	0.80	X		
28021	JW Racing	580 Valdry Ct Suite D8	2	3	4	4	2.67			
25799	KB Metals - Keep it New Auto Svc	550 Harvest Park Dr Suite C	2	3	4	4	2.67			
21429	KCS Group Inc	4431 Balfour Rd Suite D	3	5	2	2	0.80			
17617	Kelly Moore Paint Company, Inc.	2480 Sand Creek Rd	2	3	4	4	2.67	X		
10304	Kendall Automotive	205 Oak St	2	3	4	4	2.67		X	
22913	Kids 'N' Cribs Inc.	6061 B Lone Tree Way	3	5	2	2	0.80			
20822	Kinder's Meats, Deli, BBQ	5411 Lone Tree Way Ste 110	2	3	4	4	2.67			
10562	King Carpet Service	8425 Brentwood Blvd #A5	3	5	2	2	0.80	X		
	Krispy Kreme Doughnuts	2530 Sand Creek Rd.	2	3	4	4	2.67	X		
19576	Kohl's # 758	5511 Lone Tree Way	3	5	2	2	0.80	X		
27067	La Charrita Market	8560 Brentwood Blvd	3	5	2	2	0.80			
21088	La Costa Taqueria	335 Oak Street	2	3	4	4	2.67	X		
10563	La Fuente Mexican Restaurant	642 First St #3	2	3	4	4	2.67			
20529	Larry Jackson Construction Inc	7710 Brentwood Blvd Suite C	3	5	2	2	0.80			
26215	Lebec Inc	8494 Lone Tree Way	3	5	2	2	0.80			
25019	Lenscrafters #5612	2565 Sand Creek Rd Suite 124	3	5	2	2	0.80			
19641	Les Schwab Tire Center (#650)	6361 Lone Tree Way	3	5	2	2	0.80	X		
19826	Liberty Plaza	6700 Brentwood Blvd	2	3	4	4	2.67			
18493	Lift & Transfer Specialists Inc	7893 Brentwood Blvd	2	3	4	4	2.67			
26319	Lightshear Repair Specialists LLC	9000 Brentwood Blvd Suite B	3	5	2	2	0.80			
28717	Lion's Den Café & Deli	7351 Brentwood Blvd	2	3	4	4	2.67			
27219	Little Caesar's Pizza	3940 Walnut Blvd	2	3	4	4	2.67			
28531	Little Miss Everything	220 Oak St	3	5	2	2	0.80			
25674	Lone Tree Drive In	8383 Lone Tree Way	2	3	4	4	2.67			
23312	Lone Tree Garden Center	8320 Lone Tree Way	2	3	4	4	2.67			
4482	Lone Tree Medical Clinic Inc	6440 Brentwood Blvd Suite A	3	5	2	2	0.80			
22325	Lone Tree Thai Cuisine	5401 Lone Tree Way Ste 150	2	3	4	4	2.67			
27462	Los Mexicanos Market	7030 Brentwood Blvd	3	5	2	2	0.80			
29198	Lumpy's Diner Express	7760 Brentwood Blvd	2	3	4	4	2.67			
27307	Lyogurt	6560 Lone Tree Way #B	3	5	2	2	0.80			
21102	M. Balfour Inc. DBA: Mc Donald's	2351 Balfour Rd	2	3	4	4	2.67	X		
29705	Mabuhay	50 Sand Creek Rd. Ste 40	2	3	4	4	2.67			
23722	Mancinis Sleepworld	6367 Lone Tree Way Suite A	2	3	4	4	2.67	X		
23554	Mary's Delicacies	2155 Elkins Way Suite E	3	5	2	2	0.80			
21384	Mashore Auto Body & Paint	44 Sycamore Ave Suite A	2	3	4	4	2.67		X	
19261	Mauricio's Auto Shop	8570 Brentwood Blvd Suite A	2	3	4	4	2.67		X	

COMMERCIAL/INDUSTRIAL FACILITY INSPECTIONS

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	McCauley Plaza	613 First St.	2	3	4	4	2.67			
22435	McCurley's Abbey Floor Center	3850 Balfour Rd Suite L	3	5	2	2	0.80			
15298	McDonald's	7455 Brentwood Blvd	2	3	4	4	2.67	X		
10862	McGrath Supplies	8379 Lone Tree Way	3	5	2	2	0.80			
28240	Med Solutions LLC	8157 Brentwood Blvd	3	5	2	2	0.80			
27836	Mercantile Systems Inc	9040 Brentwood Blvd Suite A	3	5	2	2	0.80			
25844	Meridian Professional Center	100 Cortona Way	3	5	2	2	0.80			
17275	Mia's Mexican Restaurant	71 Sand Creek Rd #A-H2	2	3	4	4	2.67		X	
19731	Michael's Arts & Crafts #5706	5501 Lone Tree Way	3	5	2	2	0.80	X		
23936	Michael's Custom Restoration	8570 Brentwood Blvd	3	5	2	2	0.80			
29807	Micky's Fashion Outlet	1145 Second St	3	5	2	2	0.80			
16159	Micky's Magic Rod & Custom	3120 Concord Ave	2	3	4	4	2.67			
15271	Micon Automotive Inc	305 Central Terrace B	2	3	4	4	2.67			
27174	Mikado Bistro	2500 Sand Creek Rd	1	1	12	10	22.00	X		
21330	Mike Rose's Auto Body, Inc	4535 O'Hara Ave	2	3	4	4	2.67		X	
20429	Millennium Auto Care	6700 Brentwood Blvd	2	3	4	4	2.67		X	
10734	MJH Excavating	100 Balfour Rd	3	5	2	2	0.80			
27414	MJ's Downtown	655 First St	2	3	4	4	2.67			
20945	Monkey Wrenches, Inc.	8130 Brentwood Blvd	2	3	4	4	2.67			
27109	Mountain Mikes Pizza	1185 Second St Suite M	2	3	4	4	2.67	X		
21128	Mt Diablo Supply Inc	2155 Elkins Way Suite H	3	5	2	2	0.80			
21996	Muir Obstetrics & Gynecologic	350 John Muir Pkwy #205	3	5	2	2	0.80			
23183	Muir/Diablo Occupational Medicine	2400 Balfour Rd	3	5	2	2	0.80			
21337	Mundo Auto Repair	6750 Brentwood Blvd	2	3	4	4	2.67		X	
21035	National Aquatic Services Inc	9030 Brentwood Blvd Suite F	3	5	2	2	0.80			
26927	National Flooring & Supply	8890 Brentwood Blvd	3	5	2	2	0.80			
27875	Nations Giant Hamburgers	6560 Lone Tree Way Suite A	2	3	4	4	2.67	X		
24080	NeMaxx LLC	2545 Sand Creek Rd Suite 100	3	5	2	2	0.80			
15752	New Delta Cinema	641 First St	3	5	2	2	0.80			
19534	New Life Cleaners	6730 Lone Tree Way Suite 2	2	3	4	4	2.67		X	
28261	Norcal Builders	9000 Brentwood Blvd	3	5	2	2	0.80			
16724	North Valley Equine Veterinary	1145 Second St Suite A320	3	5	2	2	0.80			
29339	Northern Burgers Three LLC	6660 Lone Tree Way 8 A&B	2	3	4	4	2.67	X		
22600	Not Native	3901-C Brentwood Blvd	3	5	2	2	0.80			
25963	Numero Uno Taqueria	2261 Balfour Rd	2	3	4	4	2.67	X		
15646	Oakley Muffler & Brakes (#2)	8445-C Brentwood Blvd	2	3	4	4	2.67		X	
17379	OB Custom Cleaners Inc	2420 Sand Creek Rd Suite C3	2	3	4	4	2.67		X	
28443	One Stop Auto Service	6655 Brentwood Blvd	2	3	4	4	2.67		X	
27612	Oodles Of Noodles & More	6670 Lone Tree Way Ste #5	2	3	4	4	2.67			
23233	Orbium Inc., DBA Melo's Pizza	6580 Lone Tree Way	2	3	4	4	2.67			
19125	O'Reilly Auto Parts #3555	8600 Brentwood Blvd	2	3	4	4	2.67		X	
20282	O'Reilly Auto Parts #3631	6720 Lone Tree Way	3	5	2	2	0.80		X	
27990	Original Mel's Diner	2523 Sand Creek Rd #100	2	3	4	4	2.67	X		
29552	Orleans	613 First St	2	3	4	4	2.67			
24933	Pac Sun #1215	2535 Sand Creek Rd Suite 136	3	5	2	2	0.80	X		
22389	Pacific Urology, A Medical Corp	350 John Muir Pkwy Suite 105A	3	5	2	2	0.80			
19177	Panda Express #950	3140 Balfour Rd # A	1	1	12	10	22.00	X		
17484	Papa Murphy's Pizza	1145 Second St	3	5	2	2	0.80	X		
18987	Park Avenue Cleaners	3120 Balfour Rd Suite B	2	3	4	4	2.67		X	

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10741	Parkway Center	8150 Brentwood Blvd	2	3	4	4	2.67			
17388	Party City Of Brentwood	2470 Sand Creek Rd	3	5	2	2	0.80	X		
26231	Partys 4 You	3901 Walnut Blvd Suite A	3	5	2	2	0.80			
15266	PCT Enterprises Inc	145 Middlefield Ct	3	5	2	2	0.80			
20435	Peet's Operating Company Inc.	5411 Lone Tree Way Ste L-130	3	5	2	2	0.80			
26572	Pena's Motors	6571 Brentwood Blvd	3	5	2	2	0.80		X	
28468	Performance Machining	325 Town Centre Terr Suite B	2	3	4	4	2.67		X	
19633	Petco #1311	5481 Lone Tree Way	3	5	2	2	0.80			
28229	Pho Le	41 Sand Creek Rd # C	2	3	4	4	2.67			
29760	Pho Vietnam	622 First St.	2	3	4	4	2.67	X		
26027	Pizza Guys #155	8610 Brentwood Blvd Suite H	2	3	4	4	2.67			
28797	Pizza Guys #162	6270 Lone Tree Way Suite F	2	3	4	4	2.67			
10580	Pizzagone Family Inc	6877 Brentwood Blvd	2	3	4	4	2.67		X	
21587	Platinum Tint & Car Audio	9010 Brentwood Blvd Suite G	3	5	2	2	0.80			
23261	Preferred American Instrument	44 Sycamore Ave Suite B	3	5	2	2	0.80			
23307	Preferred American Instrument	2301 Spartan Pl Suite B	3	5	2	2	0.80			
29428	Prego Pizzeria	380 W Country Club Dr A	2	3	4	4	2.67			
15645	Prestige Gunite	144 Continente Ave 250	3	5	2	2	0.80			
27275	Prestige Manufactured Homes	2145 Elkins Way Suite F	3	5	2	2	0.80		X	
26000	Quality Clean LLC	2420 Sand Creek Rd Suite 209	2	3	4	4	2.67		X	
23362	Quick Stop Market #2149	3940-A Walnut Blvd	2	3	4	4	2.67			
30217	Quik Stop Market #3149	3940A Walnut Blvd	2	3	4	4	2.67			
29018	Quiznos Sub	8610 Brentwood Blvd Suite A	2	3	4	4	2.67			
17127	Raley's ##336	2400 Sand Creek Rd	2	3	4	4	2.67	X		
25990	Recreational Equipment Inc - REI	2475 Sand Creek Rd Suite 100	3	5	2	2	0.80			
26316	Red Robin International Inc.	2385 Sand Creek Rd	2	3	4	4	2.67	X		
28393	Reliance Construction Co	201 San Creek Rd Suite L-A	3	5	2	2	0.80			
21762	Rena's Signs	3120 Concord Ave	3	5	2	2	0.80			
19693	Reppert Precision Machinery Inc	200 Sussex Ct	2	3	4	4	2.67			
29181	Rico's Italian Pizza	4550 Balfour Rd Suite E	3	5	2	2	0.80			
30087	RJK Construction	160-B Guthrie Ln Suite 13	3	5	2	2	0.80			
27181	Road Runner RV Inc	415 Beatrice Ct	2	3	4	4	2.67		X	
28842	Robin Larreau - LRJ Motors	570 Valdry Ct Suite C10	2	3	4	4	2.67		X	
24106	Rocky Mountain Chocolate Factory	2485 Sand Creek Road #136	3	5	2	2	0.80	X		
15573	Rodda Electric Inc	380 Carrol Ct Suite L	3	5	2	2	0.80			
23751	Roland & Son Ptg Co Inc	451 Payne Ave	3	5	2	2	0.80			
22310	Rental DDS Inc	2201 Balfour Rd Suite D	3	5	2	2	0.80			
30225	Rose & Sons Glass	230 Chestnut St	3	5	2	2	0.80			
17421	Ross Dress For Less #629	2520 Sand Creek Rd	3	5	2	2	0.80			
17230	Round Table Pizza	2540 Sand Creek Rd	2	3	4	4	2.67	X		
24878	Rubio's Restaurants Inc	2505 Sand Creek Rd Suite 227	2	3	4	4	2.67	X		
28039	Rudy's Custom Concrete	8251 Lone Tree Way	3	5	2	2	0.80			
26067	S&S Towing Service	6240 Brentwood Blvd	2	3	4	4	2.67			
10641	Safeway #1234	1125 Second St	2	3	4	4	2.67	X		
19055	Safeway #2621	3110 Balfour Rd	2	3	4	4	2.67	X		
26038	Salad Makers Inc	2565 Sand Creek Rd #100	2	3	4	4	2.67	X		
23801	Sand Creek Business Center	131, 141, 171 San Creek Rd	3	5	2	2	0.80		X	
25863	Sand Creek TIC	121 Sand Creek Rd	3	5	2	2	0.80			
23804	Savers Circle K & 76 Gas Station	6750 Brentwood Blvd	2	3	4	4	2.67		X	

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29335	Savers Smog Station	6758 Brentwood Blvd Suite B	2	3	4	4	2.67		X	
25983	Savings Cleaners	6031 Lone Tree Way Suite A	2	3	4	4	2.67		X	
16788	Scary Larry's	3933-A Walnut Blvd	3	5	2	2	0.80			
27124	Scotties	2013 Elkins Way #A1	2	3	4	4	2.67		X	
21855	Sees Candies Inc Ca021	2530 Sand Creek Rd Sp.B-03	3	5	2	2	0.80			
22261	Shadow Lakes Golf Club	401 W Country Club Dr	3	5	2	2	0.80			
24842	Shirasoni	6367 Lone Tree Way	2	3	4	4	2.67	X		
25994	Siena Cleaners	2261 Balfour Rd	2	3	4	4	2.67		X	
28221	SL Creation Company	2440 Sand Creek Rd Ste E5	3	5	2	2	0.80			
21096	Sleeptrain Mattress Center	5571 Lone Tree Way	3	5	2	2	0.80			
24536	Socoast Service Station, LP	6481 Lone Tree Way	2	3	4	4	2.67			
21700	Sonrise Pro Window Cleaning	160 Guthrie Ln	3	5	2	2	0.80			
28737	Spirit Halloween Superstores	2535 Sand Creek Rd	3	5	2	2	0.80	X		
19330	Starbucks Coffee #5944	8610 Brentwood Blvd Suite 1	3	5	2	2	0.80			
	Starbucks Coffee #6719	2375 Sand Creek Rd, Suite 100	3	5	2	2	0.80	X		
19169	Starbucks Coffee #6738	3150 Balfour Rd Suite A	3	5	2	2	0.80			
21446	Sticky Chicken & Ribs	6670 Lone Tree Way Ste #1	2	3	4	4	2.67	X		
26836	Straw Hat Pizza	6680 Lone Tree way	2	3	4	4	2.67	X		
21602	Styles For Less #180	2440 Sand Creek Rd #E6	3	5	2	2	0.80	X		
23926	Subway #3379	2261-B Balfour Rd	2	3	4	4	2.67	X		
29566	Success Water Systems Inc	380 Carrol Ct Suite E	3	5	2	2	0.80			
25747	Sugimoto Dental Laboratory	4501 O'Hara Ave Suite J	3	5	2	2	0.80			
4358	Sun N Stuff	320 Oak St	3	5	2	2	0.80			
22270	Sunbusters Patio Cover Co Inc	700 Harvest Park Dr Suite F	3	5	2	2	0.80			
28420	Sunflower Antiques	240 Oak St	3	5	2	2	0.80			
25122	Sunglass Hut #5557	2485 Sand Creek Rd #108	3	5	2	2	0.80	X		
19563	Sunny Dental	141 Sand Creek Rd Suite A	3	5	2	2	0.80			
29463	Sunshine Donuts	8300 Brentwood Blvd Ste A	3	5	2	2	0.80			
24501	Swarovski #209	2455 Sand Creek Rd Ste 112	3	5	2	2	0.80	X		
19923	Sweeney's Grill	301 Oak St	2	3	4	4	2.67	X		
27825	Synergy Homecare Diablo Region	160 Guthrie Ln Suite B	3	5	2	2	0.80			
10315	Taco Bell #3437	7814 Brentwood Blvd	2	3	4	4	2.67	X		
20467	Tailgaters Sports Bar & Grill	8065 Brentwood Blvd #6	2	3	4	4	9.00		X	
24644	Talbot's #1193	2555 Sand Creek Rd	3	5	2	2	0.80	X		
28008	Tamale Lovers	8610 Brentwood Blvd. Ste. F	2	3	4	4	2.67			
18438	Tamayo Vineyards	2155 Elkins Way Suite C	3	5	2	2	0.80			
10324	Tasco Valves Unlimited	325 Town Centre Terr Suite H	3	5	2	2	0.80			
23923	Team Antoch DBA Domino's Pizza	8300 Brentwood Blvd	2	3	4	4	2.67			
15096	Templer's Autobody Towing	630 Sunset Rd	2	3	4	4	2.67		X	
23082	Terradan Construction Inc	380 Carrol Ct Suite J	3	5	2	2	0.80			
4024	The Auto Doctor	8040 Brentwood Blvd Suite B	2	3	4	4	2.67		X	
24881	The Children's Place #1963	2545 Sand Creek Rd Suite 104	3	5	2	2	0.80			
28244	The Countertop Studio	3850 Balfour Rd Suite I	3	5	2	2	0.80			
25901	The Floor Man	6625 Brentwood Blvd	3	5	2	2	0.80			
26593	The Game Sports Pub & Pizza	235 Oak St	2	3	4	4	2.67			
24648	The Ideal Floor Co	6900 Lone Tree Way	3	5	2	2	0.80			
21477	The Moulding Shop	550 Valdry Ct	2	3	4	4	2.67		X	
29320	The Pampered Pet Boutique, Inc	7720 Brentwood Blvd	3	5	2	2	0.80			
27404	The Sun Recycling Center	7021 Lone Tree Way	3	5	2	2	0.80			

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27480	The Vineyards at Marsh Creek	1700 Trilogy Pkwy	3	5	4	8	2.40			
23724	The Vintage House	735 Second St	3	5	2	2	0.80			
4474	The Weathervane Western Wear	225 Oak St	3	5	2	2	0.80			
28437	The Wishing Crab	2505 Sand Creek Rd #108	2	3	4	4	2.67	X		
4363	Thorpe Design Inc	410 Beatrice Ct Suite A	3	5	2	2	0.80		X	
16974	TJ Maxx #858	2450 Sand Creek Rd	3	5	2	2	0.80	X		
23768	TL Cakes	647 First St	3	5	2	2	0.80			
15115	Togo's Eatery	1155 Second St	2	3	4	4	2.67	X		
17450	Tompkins & Sons Inc	6240 Brentwood Blvd	2	3	4	4	2.67			
17497	Toto's Auto Body Shop	7901 Lone Tree Way	2	3	4	4	2.67		X	
15585	Tower Mart #94	8750 Brentwood Blvd	2	3	4	4	2.67		X	
3818	Town & Country Roofing	2155 Elkins Way Suite H	3	5	2	2	0.80			
22172	Toys R Us	5461 Lone Tree Way	3	5	2	2	0.80	X		
21994	Trader Joe's Company	5451 Lone Tree Way	3	5	2	2	0.80	X		
23420	Tri City Auto Plaza	6935 Lone Tree Way	2	3	4	4	2.67		X	
23494	Tri City Express Lube	6938 Lone Tree Way	2	3	4	4	2.67		X	
20937	Tri Valley Air Systems	9010 Brentwood Blvd Suite C4	3	5	2	2	0.80			
22330	Trilogy Vineyards LLC	1988 Sacred Mountain Ln	3	5	2	2	0.80			
10757	US Gearhead Club	8130 Brentwood Blvd	2	3	4	4	2.67		X	
17433	Valley Oak Nursery, Inc.	7021 Lone Tree Way	2	3	4	4	2.67			
25506	Vic Stewart's	2270 Balfour Rd	2	3	4	4	2.67	X		
24880	Victoria's Secret Stores LLC	2485 Sand Creek Rd Suite 112	3	5	2	2	0.80	X		
21937	Vintage Trans & Gear	560 Valdry Ct #B7	2	3	4	4	2.67			
27536	Visions Home Consignments	2430 Sand Creek Rd Suite D3	3	5	2	2	0.80			
27920	Viz Cleaners	6935 Lone Tree Way	2	3	4	4	2.67		X	
30094	Voodoo Hookah Lounge	50 Sand Creek Rd. Ste 42	2	3	4	4	2.67			
10217	Vornhagen Body & Paint Inc	600 Harvest Park Dr	2	3	4	4	2.67	X		
18102	Walgreens #06871	4520 Balfour Rd	3	5	2	2	0.80	X		
23445	Walgreens #09102	2271 Balfour Road	3	5	2	2	0.80	X		
22777	Walgreens #09978	6570 Lone Tree Way	3	5	2	2	0.80	X		
22221	Watersavers Irrigation Inc	395 Carrol Ct	3	5	2	2	0.80	X		
29586	We Bake Cakes	3101 Balfour Rd Ste F	3	5	2	2	0.80	X		
27290	Wellington Exterminators Inc	275 Central Terrace	3	5	2	2	0.80			
19782	West Coast Auto Sales	305 Central Terrace	2	3	4	4	2.67		X	
21386	West Coast Commercial Interiors	9020 Brentwood Blvd Suite B	3	5	2	2	0.80			
22980	West Coast Solar Inc	2155 Elkins Way Suite H	3	5	2	2	0.80			
28980	Westmont of Brentwood	450 John Muir Pkwy	3	5	2	2	0.80	X		
29876	What a Grind	761 Second St	3	5	2	2	0.80			
24529	Whit House Black Market #336	2455 Sand Creek Rd Suite 120	3	5	2	2	0.80			
19905	Willy's Bagel And Blends Llc	1155 Second St Ste D	2	3	4	4	2.67	X		
23153	Willys Bagels And Blends L L C	390 West Country Club Drive	2	3	4	4	2.67	X		
18240	Winco Foods #52	6700 Lone Tree Way	2	3	4	4	2.67	X		
4102	WJ Kirk Welding	8020 Brentwood Blvd	3	5	2	2	0.80			
24342	World of Jeans & Tops - Tilly's	2505 Sand Creek Rd Suite 152	3	5	2	2	0.80			
17083	Yogesh Trehan MD Inc	100 Cortona Way Suite 140	3	5	2	2	0.80			
27200	Yogurt Pizazz L L C	2455 Sand Creek Rd Suite 108	3	5	2	2	0.80	X		
25809	Yogurt Pizazz L L C	3860 Balfour Rd Suite E	3	5	2	2	0.80			
10457	Z Tech Machine Inc	700-A Harvest Park Dr	2	3	4	4	2.67			
27426	Zapp Inc	2019 Elkins Way Suite B	3	5	2	2	0.80			

COMMERCIAL/INDUSTRIAL FACILITY INSPECTIONS

Account Number	Firm Name	Firm Address	Priority	Freq (years)	Insp. Hrs.	Follow up Hrs.	Annual Hrs.	Inspect 2014/15	To Inspect 2015/16	NOI Facility
					1454	1448	895.5	104		



Integrated Pest Management Model Program

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Acronyms and Abbreviations

BASMAA	Bay Area Stormwater Management Agencies Association
BMP	Best Management Practice
CCCWP	Contra Costa Clean Water Program
EPA	Environmental Protection Agency
IPM	Integrated Pest Management
MRP	Municipal Regional Permit
NPDES	National Pollutant Discharge Elimination System
SOP	Standard Operating Procedures
MSDS	Material Safety Data Sheet

Section 1. Introduction

Integrated Pest Management (IPM) is a problem-solving approach to landscape and building management designed to prevent and control undesirable weeds, insects, fungi and rodents in an environmentally sensitive manner that will reduce and/or eliminate the use of pesticides. This IPM Program is a planning document to outline an IPM Program for JPA Landscape & Construction, Inc. that will reduce and/or eliminate the use of pesticides and insure compliance with all state and local stormwater related pollution prevention laws in regards to pesticide use.

1.1. IPM PROGRAM PURPOSE

The purpose of this IPM Program is to plan and outline an IPM Program that will manage pests and vegetation on public lands, rights-of-ways, and bodies of water in an environmentally sensitive manner while addressing public health, safety, economic, legal, and aesthetic requirements. The primary purpose of this IPM Program is to provide guidelines for pest management to follow which adhere to stormwater regulations, which reduces pesticide use and in turn reduces pollution associated with pesticide run-off. This IPM Program applies to internal governmental operations plus contracted services, but not to residents or businesses within the City. This IPM Program, however, will suggest Best Management Practices (BMPs) encouraging IPM methods for private businesses and residents under Section 2.7 entitled 'Outreach to the Public'.

1.2. IPM MISSION STATEMENT

The mission of this IPM Program is to promote the combined use of physical, cultural, biological and chemical control methods to effectively manage pests with minimal to no risk to humans and the environment.

1.3. IPM GOALS

The long-term goals of this IPM Program are to promote the health, safety, quality, and sustainability of public buildings, landscapes, and construction areas by managing pests without the risk to humans and the environment from use of pesticides. The long-term goals will be reached if this IPM Program document is followed. This IPM Program will:

1. Reduce use of toxic pesticides through common sense principles of IPM to the point of no pesticide use, whenever possible and practical;
2. Provide healthy, high-quality and sustainable buildings, parks and public open spaces;
3. Prevent the contamination of buildings, soil, air, and water and protect people (especially children and other vulnerable populations), animals and beneficial plants and insects from toxic exposure;
4. Provide a model of responsible stewardship of environmental and community resources; and
5. Help create public awareness and education of IPM techniques.

1.4. IPM STORMWATER PERMIT GUIDELINES

The City's current NPDES permit now a Bay Area Wide Stormwater permit or Municipal Regional Permit (MRP), No. CAS612008, Order Number R2-2009-0074, issued on October 14, 2009, states in Provision C.9 Pesticides Toxicity Control, all Permittees shall prevent the impairment of urban streams by pesticide-related toxicity and implement a pesticide toxicity control program that addresses their own and others' use of pesticides within their jurisdiction that pose a threat to water quality and that have the potential to enter the municipal conveyance system. Provision C.9 also includes requirements such as adoption and implementation of an IPM Policy or Ordinance, training of

municipal employees to implement IPM, Tracking, and participation in regulatory processes for pesticides, interface with county agricultural commissioners, evaluating source control actions relating to pesticides, public outreach for pesticides, and outreach to pest control contractors.

Please refer to the MRP for specific BMPs for permit compliance. This IPM Program will incorporate all current IPM requirements in the MRP.

1.5. MAIN COMPONENTS OF AN IPM PROGRAM

An IPM Program is a problem-solving method for landscape and structural management designed to prevent and control undesirable weeds, insects, fungi and rodents. The main components of an IPM Program are listed in Table 1.

Table 1. Main Components of an IPM Program

IPM Goal:	To control pest problems.
IPM Policy	An IPM Program must have a written policy dictating an agency's plan for implementing their IPM Program.
IPM Implementation:	Establishing the density of the pest population (that may be set at zero) that can be tolerated or correlated with a damage level sufficient to warrant treatment of the problem based on health, public safety, economic, or aesthetic thresholds. Treating pest problems to reduce populations below those levels established by damage thresholds using strategies that may include biological, cultural, mechanical, and chemical control methods and that must consider human health, ecological impact, feasibility, and cost-effectiveness.
IPM Monitoring	Establishing a baseline within a jurisdiction of present pests and pest damage. Evaluating the effects and efficacy of pest treatments.
IPM Training	JPA shall provide appropriate training for its employees on this IPM Program.
IPM Policy Review and Coordination	JPA may establish an internal IPM committee to develop the IPM Program and to monitor its implementation. The IPM committee may include representatives from each department/division responsible for pest or vegetation management. The IPM committee may meet periodically to evaluate progress and experiences in implementing JPA's IPM Program, as well as suggest revisions to the IPM Program.

1.6. IPM POLICY

An IPM policy is a written document that serves as a guideline for agencies to use as a strategy to implement their IPM Program. JPA's IPM Policy has been written and reviewed by the appropriate municipal authorities, approved by municipal representatives who are responsible for implementing the main components of the IPM Program.

1.7. ROLES AND RESPONSIBILITIES

In order to establish an effective IPM Program, individual tasks will be delegated to JPA representatives who are responsible for implementing the main components of an IPM Program. The following are the designated roles for municipal officials to delegate the IPM Program: Department Director(s); Director of Public Works and Director of Parks & Recreation.

IPM Coordinator:

The duties for each designated role are as follows:

The Department Director shall be responsible for:

1. Ensuring that department procedures, budget and staffing decisions support implementation of the IPM Program;
2. Providing training to ground management staff in the requirements of the IPM Program;
3. Designating an IPM Coordinator to ensure products used by the department meet the standards outlined in the IPM Program and represents the department on the IPM Committee; and,
4. At least annually and in conjunction with the IPM Committee.

Note: included in our annual report.

The IPM Committee is responsible for:

1. Meeting on a regular basis to review and discuss pest management practices;
2. Developing, adopting and periodically reviewing the Tiered Product List (outlined in Section 2 of this IPM Program);
3. Reviewing, approving and denying exemptions to the Phased-out Pesticide approved list (outlined in Section 2 of this IPM Program);
4. Reviewing emergency pest control decisions;
5. Investigating low-risk/least hazardous alternatives to conventional treatments;
6. Assisting departments in implementing the IPM Program by developing educational information for staff and public users about IPM plans and programs; and,
7. Conducting an annual review of the written IPM Program and recommend appropriate revisions to ensure the program meets the intended purpose and goals of IPM.

The individual IPM Committee members will be comprised of representatives from JPA Landscape & Construction, Inc.

The IPM Committee will meet on a set regular schedule. If the IPM Committee is disbanded or becomes inactive at any time during this program implementation, the responsibilities of the IPM Committee will be assigned to its successor, if any. The IPM Committee's role is supportive of the IPM Coordinator(s).

The IPM Coordinator shall be responsible for:

1. Coordinating efforts to adopt IPM techniques;

2. Communicating with all staff on the goals and guidelines of the IPM Program;
3. Coordinating training programs for staff;
4. Facilitating meetings with the IPM Committee;
5. Tracking all pesticide use and ensuring that the information is available to the public;
6. Preparing the IPM Annual Report;
7. Presenting an annual report to evaluate the progress of the IPM Program; and,
8. Coordinating with other public agencies that are practicing IPM.

The Annual Report should, at a minimum:

1. Identify the types of pest problems that the department has encountered;
2. Identify the types and quantities of pesticides used by the department;
3. Identify the alternatives currently used for phased out pesticides;
4. Identify the alternatives proposed for adoption within the next 12 months;
5. Identify the exemptions currently in place and granted during the past year;
6. Identify planned changes to pest management practices; and,
7. Evaluate the effectiveness of any changes in practice implemented.

1.8. DEFINITIONS

Contract: is a binding written agreement requiring the services of an outside provider for grounds maintenance or any pest control related services.

Contractor: is a person, firm, corporation or other entity, including a governmental entity that enters into a contract with a department.

Emergency: is a pest outbreak that poses an immediate threat to public health or significant economic or environmental damage.

Exemption: is a process by which materials, not on the tiered product list, can temporarily be used, but only after all alternatives have been reviewed, evaluated, and/or implemented and only after the IPM Advisory Committee and/or the IPM Coordinator has authorized the use of the pesticide for the specific purpose. The application for an exemption shall be filed on a form specified by the IPM Advisory Committee and signed by the IPM Coordinator. The decision to approve an exemption will be based upon an evaluation of the failure of alternatives, and taking into consideration public health, environmental and financial risks.

Hazardous Material: is a chemical or mixture that may pose a physical hazard, health hazard, or environmental hazard and that is regulated under the law to control its harmful effects. This definition is not intended to be rigid or legalistic because all materials regulated in this manner merit special attention and consideration under this program.

Integrated Pest Management: is a coordinated decision-making and action process that uses the most appropriate pest control methods and strategy in an environmentally and economically sound manner to meet agency programmatic pest management objectives. IPM is also an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties.

IPM Committee: the IPM Committee is responsible for guiding the agency-wide implementation of the approved IPM Program. The IPM Committee shall consist of representatives from JPA Landscape & Construction, Inc.

The IPM Committee will have a set schedule for regular committee meetings throughout the year.

IPM Coordinator: is a designated individual that facilitates the IPM Program within JPA and oversees the application of pesticides or contract pesticide applicators. The Management may appoint a person to coordinate these activities on a site by site basis to serve as the primary point of contact. The IPM Coordinator shall be trained in the principles of low-risk IPM, safe application of pesticides and alternatives to pesticide use.

IPM Policy: is a written document that serves as a guideline for JPA to use as a strategy to implement its IPM Program.

IPM Program: is a coordinated pest management approach that implements an IPM policy, management plans specific to types of sites or pests, training requirements, record keeping and evaluation practices.

Landscapes: are grounds that are actively managed such as parks, plantings lawns around public buildings, right-of-ways, watersheds, and open spaces.

Pest: is any insect, rodent, nematode, snail, weed, fungus or other form of plant or animal life that adversely interferes with the aesthetic, health, safety, environmental or economic goals of a jurisdiction. Pest shall not include viruses or microorganisms on or in a living person or animal, but shall include plant diseases.

Pesticides: are chemical agents registered as pesticides by the California Food and Agricultural Code, Section 12753 of Chapter 2 of Division 7, which can be an herbicide, insecticide, fungicide or other chemical that repels, changes the regular growth rate of, kills, or otherwise reduces levels of a targeted pest or pests.

Pesticide Free Zones: a site or area within a site designated as a "Pesticide Free Zone" in order to further reduce and eliminate pesticide use in areas of higher public

exposure or areas with high environmental sensitivity. Any pesticide use deemed necessary for the protection of public areas, public safety, and environment in these zones will only be authorized through the exemption process.

Sustainable Design, Construction, and Maintenance: principles, materials, and techniques that conserve natural resources and improve environmental quality throughout the life cycle of the landscape and its surrounding environment. Sustainable designs for buildings and landscapes incorporate methods that reduce the potential for pest problems from the start and with long-term maintenance needs in mind.

Toxicity Category I Pesticide Product: any pesticide product that meets U.S. EPA criteria for Toxicity Category I under Section 156.10 of Part 156 of Title 40 of the Code of Federal Regulations.

Toxicity Category II Pesticide Product: any pesticide product that meets U.S. EPA criteria for Toxicity Category II under Section 156.10 of Part 156 of Title 40 of the Code of Federal Regulations.

Section 2. Implementation Practices

Section 2 reviews the specific practices to be followed for pesticide selection and approval, choosing a pesticide applicator/service, and appropriate pesticide application practices such as education and training for applicators, notification of applying a pesticide, record keeping and outreach to the public.

2.1. PESTICIDE SELECTION AND APPROVAL

The IPM Coordinator(s) will make product recommendations based on a tiered risk assessment of pesticides. The Management will develop this tiered risk assessment of pesticides. A prioritized list of products will be developed to identify products that may be targeted for future phase-out based on review of the product's contents, precautions, need for the product, and adverse health and environmental effects. The list shall be submitted as part of the annual report. The list may be used if determined appropriate by the IPM Coordinator(s) in compliance with the emergency exemption process (see Section 2.1.d).

Criteria for developing the product list shall be based on acute and chronic toxicity of products and chemicals known to cause cancer and known to cause reproductive toxicity. Environmental impacts of the products shall also be considered.

Products on the Tiered Product List will be divided into three classifications:

- Approved Use
- Limited Use
- Banned Use

If the use of a material that is not on the Approved Use or Limited Use tier list is deemed necessary, the IPM Coordinator may apply for an emergency exemption (see Section 2.1.d).

a. Approved Use Products

The first tier classification of pesticides is the Approved Use Product tier. These pesticides have been approved for use by the IPM Coordinator(s) along with any restrictions for such use. The Approved Use Products list shall include but are not limited to:

- Insecticides, rodenticide baits and traps
- Caulking agents and crack sealants
- Borates, silicates, and diatomaceous earth
- Soap-based products
- Natural products on the FIFRA's 23(b) list (40 DFR part 152.25 (g)(1))¹
- Natural products on the California Certified Organic Farmers' organic list
- EPA GRAS-generally recognized as safe products pursuant to Federal EPA
- Cryogenics, electronic products, heat and light
- Biological controls such as parasites and predators
- Physical barriers
- Roundup

¹In 1996, EPA exempted certain minimum risk pesticides from **1-11-RA** requirements if they satisfy certain conditions. EPA exempted the products described in 40 CFR section 152.25(g) in part to reduce the cost and regulatory burdens on businesses as well as the public for pesticides posing little or no risk, and to focus EPA's limited resources on pesticides which pose greater risk to humans and the environment. This exemption provision is located in section 152.25(g) of Title 40 of the Code of Federal Regulations.

- Sluggo
- Pheromones and attractants for traps

b. Limited Use Products

The **IPM Coordinator** may grant a recommendation that particular pesticides not classified as the Approved Use be approved for a specific purpose. Limited use products may not be a pesticide on the Banned Use Product. The IPM Committee may grant a limited use exemption upon a finding that the requestor has:

1. Identified a compelling need to use the pesticide.
2. Made a good faith effort to find alternatives to the particular pesticide.
3. Demonstrated that effective, economic alternatives to the particular pesticide do not exist for the particular use.
4. Developed a reasonable plan for investigating alternatives to the pesticide in question during the exemption period.

c. Banned Use Products

The following high health-risk pest management products are completely banned from use in Contra Costa County:

1. Pesticides linked to cancer (US EPA Class A, B and C carcinogens and chemicals known to the State of California to cause cancer under Proposition 65).
2. Pesticides that cause birth defects, reproductive, or development harm (identified by the US EPA or known to the State of California under Proposition 65 as reproductive or development toxins).

3. Pesticides classified as Toxicity Category I pesticide products by the US EPA, carbonate, and organophosphate pesticides.
4. Foggers, bombs, fumigants, or sprays that contain pesticides identified by the State of California as potentially hazardous to human health (CFR 6198.5).
5. Pesticides that interfere with human hormones.

d. Emergency Exemption

A department may apply to the IPM Coordinator for an emergency exemption to use a phased out product in the event that an emergency pest outbreak poses an immediate threat to public health or significant economic damage will result from failure to use a pesticide. The IPM Coordinator will have a list of products phased out from prior use based on their product tier system. An application for an exemption shall be filed using the material exception request application form. Appendix "B" to this document provides an example Material Exception Request for Pesticide Application Form.

The IPM Coordinator shall respond to the application in a timely manner. If the requesting department is unable to reach the IPM Coordinator, the IPM Coordinator may authorize the one-time emergency use of the required pesticide. The IPM Coordinator must notify the IPM Coordinator of the determination to use the pesticide prior to its application in the event that the IPM Coordinator is unable to make the request to the IPM Coordinator.

The IPM Coordinator will review the circumstances of the emergency permit issued by the IPM Coordinator. Signs shall be posted at the time of application and remain posted two (2) days following the application (see Appendix "C" for sign example). The IPM Coordinator may impose additional conditions for emergency applications such as limited use around sensitive areas housing people, wildlife habitat, and

waters of the State. All pesticide application will abide by State and Federal application law.

Establishing "Pesticide Free Zones" - A site or area within a site that is designated as a "Pesticide Free Zone" in order to further reduce and eliminate pesticide use in areas of higher public exposure or areas with high environmental sensitivity. Any pesticide use deemed necessary for the protection of public areas, public safety, and environment in these zones will only be authorized through the exemption process.

JPA will base decisions to add to the list of Pesticide Free Zones upon monitoring the effectiveness of alternatives and other factors. It is the intention over time to expand these zones as times and resources allow.

2.2. PESTICIDE APPLICATOR/IPM PROVIDER SELECTION AND APPROVAL

JPA will implement a process to ensure that any contractor employed to conduct pest control and pesticide application on municipal property engages in pest control methods consistent with this IPM program. Contractors will be required to follow the agency's IPM policy, SOPs, and BMPs; provide evidence to JPA of having received training on current IPM techniques when feasible; and, provide documentation of pesticide use on agency property to the agency in a timely manner. In the process of hiring a contractor for IPM the contractor may be required to provide a statement of qualifications for IPM services. In addition, the contractor shall submit to JPA an IPM implementation plan that includes:

- Types and estimated quantities of pesticides that the contractor may need to apply to during it's the contracted work;
- Outline actions the contractor will take to meet the IPM program to the maximum extent practicable; and
- Identify the primary IPM contract for the contractor.

JPA shall require IPM certification from an approved IPM program such as Ecowise, Bay Friendly, or another program approved by the Regional Board. In addition, the contractor will sign a contract for pesticide application services that includes the IPM implementation plan detailed above that has been approved by JPA and contractor prior to start of application services. A model contract for IPM services has been included in this document as Appendix "D."

A contractor, or department on behalf of a contractor, may apply for any material application exemption authorized under the exemptions section 2.1.d of this IPM program.

2.3. IPM APPLICATION

Only persons specifically appointed by the IPM Coordinator as Pesticide Applicators will be permitted to use pesticides on municipal facilities. Use of pesticides by Pesticide Applicators is limited to Approved Use and Limited Use Products. Pesticide Applicators must follow regulations and label precautions.

Pesticide Applicators and municipal employees that could potentially be exposed to pesticides will receive IPM training and hazard materials training for the safe use of pesticides and other grounds maintenance hazardous materials in their workplace by their supervisor or designee. As each municipal IPM Program is updated and its objectives reviewed, the program staff will be trained accordingly to understand the program's periodic changes. Education will include formal classroom training, on-site and informal meetings for those employees responsible for providing pest control at least once per year. No pesticides may be used at JPA facilities except in accordance with this IPM Program.

Municipalities do not have the authority to regulate the use of pesticides by school districts; however, the California Healthy Schools Act of 2000 (AB 2260) has imposed requirements on California school districts regarding pesticide use in schools. Posting of

notification prior to the application of pesticides is now required, and IPM is stated as the preferred approach to pest management in schools.

2.4. EDUCATION AND TRAINING

Increasing knowledge of municipal staff and contractors who design and maintain buildings and landscapes is critical to the success of this IPM Program and a requirement of the MRP. Consequently, providing ongoing training and educational opportunities to municipal staff and contractors regarding building and landscape IPM concepts, practices and products will be a priority.

The Federal Pesticide, Fungicide, and Rodenticide Act and California Title 3, Division 6, Pesticides and pest Control Operations place strict controls over pesticide application and handling and specify training, annual refresher, and testing requirements. The regulations generally cover; a list of approved pesticides and selected uses that is updated regularly; general application information; equipment use and maintenance procedures; and record keeping. The California Department of Pesticide Regulations and the County Agricultural Commission coordinate and maintain the licensing and certification programs. All municipal employees who apply pesticides and herbicides in "agricultural use" areas such as parks, golf courses, rights-of-way and recreation areas should be properly certified in accordance with state regulations. Contracts for landscape maintenance should include similar requirements.

All staff associated with planning, design, construction and maintenance of buildings and landscapes shall receive an orientation to this IPM Program and their roles and responsibilities in implementing it in a written or verbal format.

All JPA employees who handle pesticides should be familiar with the most recent material safety data sheet (MSDS) files.

The IPM Coordinator will be responsible for coordinating training events for all pesticide applicators and municipal staff involved with grounds maintenance. IPM training may be coordinated through the IPM Coordinator. The IPM Coordinator shall arrange for educational opportunities to assist implementing the IPM program each year. The IPM Coordinator shall inform employees on department policies and procedures relevant to this IPM Program and keep staff current with best landscape-management practices and technologies that utilize IPM. Employees shall also be involved in identifying and implementing strategies to minimize the use of pesticides and in evaluating replacements to chemicals targeted for phase-out.

All personnel involved in pest management activities shall receive training on:

- Orientation to the IPM Program;
- Identification and lifecycles of typical northern California pests, weeds and beneficial insects; threshold levels for different types of landscapes; monitoring techniques; and strategies for successful management of these pests;
- Noxious weed identification, control and regulations;
- Pesticide laws and safety; and
- Specific best management practices as appropriate.

Training will be provided by JPA staff, IPM consultants, IPM technical advisors and invited guest speakers. The IPM Coordinator, with assistance from any existing IPM Committee, will schedule training. Training and educational opportunities, both formal and informal, will also occur at landscape staff meetings. Managers and supervisors are not only expected to participate in the training, but to fully support involvement of their staff and contractors in the training.

2.5. NOTIFICATION OF PESTICIDE APPLICATIONS

Any department that uses any pesticide shall comply with the following notification procedures:

1. Signs shall be posted at least two (2) working days before application of the pesticide product and remain posted at least two (2) working days after application of the pesticide (see Appendix "C" for sample sign).
2. Signs shall be posted at every entry point where the pesticide is applied if it is applied in an enclosed area; and in highly visible locations, signs will be posted around the perimeter of the area where the pesticide is applied.
3. Signs shall be of standard design that is easily recognizable to the public and City employees (see Appendix "C" for sample sign).
4. Signs shall contain the name and active ingredient of the pesticide product, target pest, the date of pesticide use, the toxicity category of the pesticide project, the name and contact number for the department responsible for the application (see Appendix "C" for sample sign).
5. Individual copies of posted signs shall be retained for record keeping purposes for one year.

Signs are not required in right-of-way location where public use and potential exposure is limited. Each department that uses pesticides in locations where their use is not posted shall develop and maintain a public access telephone number or website information regarding pesticide applications in these areas.

The IPM Coordinator may authorize the application of a pesticide without providing a two-day advance notification in the event of a public health emergency or to comply with worker safety requirements.

The IPM Coordinator may grant exemptions to the notification requirements for one-time pesticide uses and may authorize permanent changes in the way JPA notify the public about pesticide use in specific circumstances (refer to Section 2.1.d for procedure). Upon finding, that good cause exists to allow an exemption pursuant to this clause, the department requesting the exemption shall identify specific situations in which it is not possible to comply with the notification requirements and propose alternative notification procedures. The IPM Coordinator shall review and approve the alternative notification procedure.

Pesticide use information shall be made available to staff and the public upon request. Each department shall maintain a list of all materials applied on a site-specific basis. The list shall be available at each department's main offices or made available to the public upon request.

2.6. RECORD KEEPING/PROGRAM REVIEW

Annually the IPM Coordinator will gather information for the IPM Annual Report. Each user will submit a summary of the previous year's pilot projects, a timeline for implementing pilot project recommendation and viable changes at other sites, and plans for any new pilot projects including changes that can be implemented in the next fiscal year. Pilot projects will be used to evaluate pesticide use, IPM Program costs and cost savings.

Each department that uses pesticides shall keep records of all pest management activities. Each record shall include the following information:

- Target pest,
- Type and quantity of pesticide used,
- Specific location of the pesticide application,
- Date of pesticide application,

- Application equipment used,
- Prevention and other non-chemical methods of control used,
- Experimental efforts, if any; and
- Exemptions granted for that application.

Each department that uses pesticides shall maintain a pest management record (see Appendix "E" for form example). Pest management records shall be made readily available to the public upon request.

2.7. OUTREACH TO THE PUBLIC

Efforts will be made to educate the public about reduced risk pest management goals and practices implemented under the IPM Program in the most effective manner given time and budget constraints. Various venues may be utilized for public education and information including:

- Website
- Articles in publications (newspaper and newsletters)
- Press release (as appropriate)
- IPM Program outreach campaign

The MRP requirements for public outreach include point of purchase outreach (outreach to consumers at the point of purchase), outreach to residents who use or contract for structural or landscape pest control, and outreach to pest control operators and landscapers. These outreach activities can be coordinated through the Contra Costa Clean Water Program and other members of BASMAA.

2.8. PRECAUTIONARY PRINCIPLE

It is the policy of JPA to adopt, properly implement and practice low risk/least hazardous IPM with the goal of immediately minimizing the risk of pesticide exposure to staff, the environment and the public.

This IPM Program is based on what is referred to as the "Precautionary Principle" of pest management. The guiding principles in this program are based on the following:

1. No pesticide is free from risk or threat to human health,
2. All reasonable alternative measures of pest management have been attempted and have been demonstrated to be unsuccessful, and
3. Pesticides suspected of being in conflict with the mission and goals of this IPM Program shall not be used without exemption, or until it is determined that a specific product is safe for use around sensitive individuals (i.e. children, elderly asthmatics, etc.)

The Precautionary Principle should guide decision-making processes when it comes to the health and safety of municipal staff and the public. All aspects of the IPM Program will be in accordance with Federal and State laws and regulations.

Section 3. IPM Practices

Section 3 discusses the three main types of managerial areas concerned with IPM, their definition, common pest concerns involved, and suggested management strategies for IPM implementation. In order to design an IPM Program that will be implemented, specific IPM practices or BMPs need to be discussed. The BMPs discussed in this section are in no way comprehensive for the entire discipline of IPM. In addition, this IPM Program is a working document and will be modified as more pest information and technologies become available. This IPM Program provides a list of resources in Appendix "F" that list IPM BMPs for an IPM Program. Appendix "F" will be reviewed by JPA as suggested list of IPM BMPs to begin to implement an IPM Program. In the event that stormwater regulation is updated and/or IPM practices are updated from practical experience, this document will be updated accordingly.

3.1. **STRUCTURAL IPM**

Structural maintenance includes the management of pests in and around building structures such as office complexes, libraries, correctional facilities, hospitals, schools, yards, animal shelters etc. Pest management in and around buildings typically involve a combination of chemical (insecticide) application and/or mechanical methods of removing pests. All of these maintenance practices have the potential to harm the environment and human health.

The common pest concerns for buildings include ants, rodents, spiders, termites and other organisms. These organisms usually enter buildings for shelter and food but are unwanted near human inhabitants.

It is important that JPA assess the current pest problems in and around their public buildings to develop a site-specific pesticide and grounds maintenance plan for all public

sites as needed. These plans will include a management strategy for pests incorporating IPM practices for inside and outside all public buildings.

Many of the IPM protocols for removing such organisms from buildings involve prevention strategies.

3.2. LANDSCAPE IPM

Landscape maintenance includes the management of pest in and around medians, rights of ways, airports, public works, parks, plazas, open space, creek areas, country clubs, gardens, and golf courses. Landscape maintenance activities include vegetation removal; herbicide and insecticide application; fertilizer application; watering; and other gardening and lawn and landscape care practices. Vegetation control typically involves a combination of chemical (herbicide) application and mechanical methods. All of these maintenance practices have the potential to contribute pollutants to the storm drain system.

The common pest concerns for landscape and turf include noxious weeds, rodents, ground squirrels, and other invasive animals that destroy the welfare of the landscape plants.

The major objectives of this BMP are to minimize the discharge of pesticides, herbicides, and fertilizers to the storm drain system and receiving waters; prevent the disposal of landscape waste into the storm drain system by collecting and properly disposing of clippings and cuttings, and educating employees and the public.

Many of the IPM protocols for turf and landscape management include:

- Protection of the storm drain system from contaminated runoff;
- Proper disposal of removed vegetation;
- Smart irrigation management to control runoff from overwatering;

- Manuel weeding rather than use of chemicals/herbicides;
- Manuel removal of pests of vegetation (i.e. birds and insects);
- Composting and mulching practices;
- Alternative landscaping other than turf;
- Alternative fertilization practices and products;
- Erosion control;
- Planting of native, drought resistant plants;
- Reducing pesticide/herbicide/insecticide use;
- Removal and replacement of plants laden with bacteria, parasites, and fungi;
- Prevention practices to ward off pests from landscaped areas;
- Promoting beneficial organisms to feed on pests;
- Understanding of current pests problems that exist rather than relying on a preventative schedule of applying chemicals;
- Testing of soils for proper additive application;
- Education of employees on IPM methods and inspection of contracted employees for IPM practices; and,
- Documentation and monitoring of all pesticide use.

3.3. CONSTRUCTION AND DEVELOPMENT IPM

Construction and development management includes landscape design or renovation of existing landscape. Poorly planned landscape designs may require intensive maintenance and greater reliance on pesticides for pest control than landscapes created with IPM design specifications.

Departments participating in public projects that include the design of new landscapes or renovation of existing landscapes shall design and construct the project consistent with IPM plans to ensure that, where possible, the design considers IPM measures.

In planning, designing and installing landscapes owned and managed by JPA, site objectives shall include future management and maintenance practices that protect and enhance natural ecosystem. The design should take into account parameters that will enhance the intended use of land and minimize pest problems; such as, types of uses, soil conditions, grading and slope, water table, drainage, proximity to sensitive areas, selection of vegetation and vector control issues. Priority shall be given to IPM strategies when designing new and renovating existing landscape areas.

Section 4. References

King County Stormwater Pollution Control Manual. Best Management Practices for Businesses. 1995. King County Surface Water Management. July. On-line: <http://dnr.metroke.gov/wlr/dss/spcm.htm>

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Orange County Stormwater Program:

http://www.ocwatersheds.com/StormWater/swp_introduction.asp

Santa Clara Valley Urban Runoff Pollution Prevention Program. 1997 Urban Runoff Management Plan. September 1997, updated 2000.

United States Environmental Protection Agency (USEPA). 2002. Pollution Prevention/Good Housekeeping for Municipal Operations Landscaping and Lawn Care. Office of Water. Office of Wastewater Management. On-line:

http://www.epa.gov/npdes/menuofbmps/poll_8.htm

California's Nonpoint Source Program Plan: <http://www.swrcb.ca.gov/nps/index.html>

King's County: <ftp://dnr.metrokc.gov/e1r/dss/spcm/Chapter%203.pdf>

Orange County Stormwater Program:

http://www.ocwatersheds.com/StormWater/smp_introduction.asp

Mobile Cleaners Pilot Program: Final Report. 1997. Bay Area Stormwater Management Agencies Association (BASMAA): <http://www.basmaa.org/>

Pollution from Surface Cleaning Folder. 1996. Bay Area Stormwater Management Agencies Association (BASMAA): <http://www.basmaa.org/>

San Diego Stormwater Co-permittees Jurisdictional Urban Runoff Management Program (URMP):

<http://www.projectcleanwater.org/pdf/ModerY020Program%20MunicipalY020Facilities.pdf>

Appendix A. IPM Policy

Appendix B. Material Exception Request for Pesticide Application Form

Appendix C. Notice of Pesticide Application

Appendix D. Example of Pesticide Applicator Contract/ Lease

Appendix E. Pest Management Record

Appendix F. Resources

www.stopwaste.org or 510-444-SOIL

UCCE Cooperative Extension Alameda 1131 Harbor Bay Parkway, Suite 131 Alameda CA 94502

Alameda County Master Gardener Program 510-639-1275 <http://acmg.ucdavis.edu>

Useful Gardening Websites:

Pests, Diseases, and Weeds:

www.ipm.ucdavis.edu

UC Guide to Healthy Lawns:

www.imp.usdavis.edu/tools/turf

UC Home Orchard Information:

<http://homeorchard.ucdavis.edu/>

UC Vegetable and Research Information:

<http://vric.ucdavis.edu>

JPA – Integrated Pest Management (IPM) Policy

It is the purpose and intent of this IPM Policy to ensure that JPA Landscape & Construction, Inc. departments and all those who apply pesticides to property owned and/or managed by JPA Landscape & Construction, Inc. utilize integrated pest management (IPM) practices, eliminates or reduce pesticide applications on public-owned and/or JPA Landscape & Construction, Inc. managed property to the maximum extent feasible and as required by State and Regional Stormwater regulation to take all reasonable measures to ensure that pest control activities do not threaten environmental and human health.

JPA Landscape & Construction, Inc. in carrying out its pest management operations, shall focus on long term prevention or suppression of pest problems with minimum impact on human health, non-target organisms, and the environment.

The goal of JPA Landscape & Construction, Inc. is to reduce its use of pesticides and ultimately replace all pesticides with non-toxic methods of controlling pests on JPA Landscape & Construction, Inc. property. JPA Landscape & Construction, Inc. recognizes that pesticides are potentially hazardous to human health and the environment, and non-pesticide alternatives will be considered over toxic pesticides on JPA Landscape & Construction, Inc. property. JPA Landscape & Construction, Inc. has developed an IPM program that outlines all of the IPM activities that shall be implemented to ensure that less toxic methods are used to control pests on JPA Landscape & Construction, Inc. property. JPA Landscape & Construction, Inc.'s IPM Program includes the following elements:

1. Establish inspection procedures to monitor pest population levels, perform thorough field assessments of each pest problem, and keep records of such monitoring. Monitoring should be performed by designated personnel or contractors knowledgeable in IPM methods.
2. Establish for each pest an IPM implementation plan which evaluates the biological, aesthetic, and economic loss each site can tolerate and set pest population levels at which corrective action should be taken to ensure that pests do not exceed tolerance levels.
3. Determine corrective actions when an action threshold is reached. Review and consider all available non-chemical operations for acceptability and feasibility. Consider the use of chemicals only as a last resort. Select and use chemicals only in accordance with State, Federal and local law and in accordance to the pesticide selection method outlined in JPA Landscape & Construction, Inc.'s IPM program document.
4. Identify and evaluate conditions that encourage pest problems. Modify pest ecosystems to reduce food and living space through physical and cultural practices.
5. Determine most effective treatment time, based on pest biology and other variables identified during the above mentioned inspection and monitoring efforts during the field assessments of each pest problem.
6. Establish and maintain an accurate electronic data base to catalog monitoring information and to document and evaluate the effectiveness of pest management procedures.
7. Evaluate the effectiveness of the IPM program and make adjustments as needed.
8. Conduct an ongoing education program for JPA Landscape & Construction, Inc. staff, contract maintenance personnel and member of the public.
9. Designate an IPM Coordinator and Committee to oversee that the IPM program is implemented correctly and appropriately to uphold this document's goals and objectives for IPM practices.
10. Hire pesticide applicators that incorporate IPM implementation in their services and bind them to all JPA Landscape & Construction, Inc. IPM policies outlined in JPA Landscape & Construction, Inc. IPM program document.

JPA – Integrated Pest Management (IPM) Policy

Es el propósito y la intención de esta política de IPM para garantizar que los departamentos de JPA Landscape & Construction, Inc. y todos quienes aplican plaguicidas a propiedad debida y/o gestionados por JPA Landscape & Construction, Inc. utilizan integración las prácticas de manejo de plagas, elimina o reducir las aplicaciones de pesticidas en propiedad pública y/o JPA Landscape & Construction, Inc. gestionados de propiedad en la máxima medida posible y conforme al Reglamento del Estado y del agua regional a tomar todas las medidas razonables para garantizar que las actividades de control de plagas no amenazan a la salud ambiental y humana.

JPA Landscape & Construction, Inc. está realizando sus operaciones de manejo de plagas, deberá centrarse en la prevención a largo plazo o la supresión de los problemas de plagas con mínimo impacto en la salud humana, los organismos no objetivo y el medio ambiente.

El objetivo de JPA Landscape & Construction, Inc. es reducir su uso de los plaguicidas y, en definitiva, reemplazar todos los plaguicidas con métodos no tóxicos para controlar las plagas sobre la propiedad de JPA Landscape & Construction, Inc. JPA Landscape & Construction, Inc. reconoce que pesticidas son potencialmente peligrosos para la salud humana y el medio ambiente, y alternativas de plaguicidas no se considerará sobre plaguicidas tóxicos en propiedad de JPA Landscape & Construction, Inc. JPA Landscape & Construction, Inc. ha desarrollado un programa de IPM que describe todas las actividades de IPM que se llevará a cabo para garantizar que se utilizan métodos menos tóxicos para controlar las plagas sobre la propiedad de JPA Landscape & Construction, Inc.. El programa de IPM de JPA Landscape & Construction, Inc. incluye los siguientes elementos:

1. Establecer procedimientos de inspección para controlar los niveles de población de plagas, realizar evaluaciones de campo profundo de cada problema de plagas y mantener registros de esa vigilancia. Supervisión debe realizarse por personal designado o contratistas con conocimientos en métodos de IPM.
2. Establecer, para cada tipo de plagas, un plan de implementación de IPM que evalúa el biológico, estética, y pérdidas económicas cada sitio puede tolerar y establecer los niveles de población de plagas en el que deberían adoptarse medidas correctivas para garantizar que las plagas no supera los niveles de tolerancia.
3. Determinar las acciones correctivas cuando se alcanza un umbral de acción. Revise y considere la posibilidad de todas las operaciones no químicos disponibles para la aceptabilidad y la viabilidad. Considere el uso de productos químicos sólo como último recurso. Seleccionar y utilizar productos químicos sólo de conformidad con la ley estatal, Federal y local y de acuerdo con el método de selección de plaguicidas expuesto en el documento de IPM programa JPA Landscape & Construction, Inc.
4. Identificar y evaluar las condiciones que favorecen los problemas de plagas. Modificar los ecosistemas de plagas para reducir la comida y espacio de vida a través de prácticas físicas y culturales.
5. Determinar el tiempo de tratamiento más eficaz, basado en la biología de las plagas y otras variables identificadas durante la inspección antes mencionado y las actividades de vigilancia durante las evaluaciones de campo de cada problema de plagas.
6. Establecer y mantener un preciso electrónico de datos base para catalogar la información de supervisión y para documentar y evaluar la eficacia de los procedimientos de gestión de plagas.
7. Evaluar la efectividad del programa IPM y realice los ajustes según sea necesario.
8. Llevar a cabo un programa de educación permanente para personal de JPA Landscape & Construction, Inc., personal de mantenimiento de contrato y miembros del público.
9. Designar un coordinador del IPM y el Comité para supervisar que el programa de IPM se aplique correctamente y adecuadamente para defender este documento metas y objetivos para las prácticas de IPM.
10. Contratar aplicadores de plaguicidas que incorporen la implementación del IPM en sus servicios y enlazan a todas las políticas de JPA Landscape & Construction, Inc. IPM expuestas en el documento de programa de IPM JPA Landscape & Construction, Inc.



**Terracare Associates California
Integrated Pest Management
Program**

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Table 1. Main Components of an IPM Program

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Appendix A. Resources

Acronyms and Abbreviations

BASMAA	Bay Area Stormwater Management Agencies Association
BMP	Best Management Practice
CCCWP	Contra Costa Clean Water Program
EPA	Environmental Protection Agency
IPM	Integrated Pest Management
MRP	Municipal Regional Permit
NPDES	National Pollutant Discharge Elimination System
SOP	Standard Operating Procedures
MSDS	Material Safety Data Sheet

Section 1. Introduction

Integrated Pest Management (IPM) is a problem-solving approach to landscape management designed to prevent and control undesirable weeds, insects, and rodents in an environmentally sensitive manner that will reduce and/or eliminate the use of pesticides. This IPM Program is a planning document to outline an IPM Program for Terracare Associates that will reduce and/or eliminate the use of pesticides and insure compliance with all state and local stormwater related pollution prevention laws in regards to pesticide use.

1.1. IPM PROGRAM PURPOSE

The purpose of this IPM Program is to plan and outline an IPM Program that will manage pests and vegetation on public lands, rights-of-ways, and bodies of water in an environmentally sensitive manner while addressing public health, safety, economic, legal, and aesthetic requirements. The primary purpose of this IPM Program is to provide guidelines for pest management to follow which adhere to stormwater regulations, which reduces pesticide use and in turn reduces pollution associated with pesticide run-off. This IPM Program applies to Terracare Associates and Sub-Contractors operations. This IPM Program, however, will suggest Best Management Practices (BMPs) encouraging IPM methods for Terracare Associates maintained landscapes.

1.2. IPM MISSION STATEMENT

The mission of this IPM Program is to promote the combined use of physical, cultural, biological and chemical control methods to effectively manage pests with minimal to no risk to humans and the environment.

1.3. IPM GOALS

The long-term goals of this IPM Program are to promote the health, safety, quality, and sustainability of landscapes, by managing pests without the risk to humans and the environment from use of pesticides. The long-term goals will be reached if this IPM Program document is followed. This IPM Program will:

1. Reduce use of toxic pesticides through common sense principles of IPM to the point of no pesticide use, whenever possible and practical;
2. Provide healthy, high-quality and sustainable landscapes;
3. Prevent the contamination of soil, air, and water and protect people (especially children and other vulnerable populations), animals and beneficial plants and insects from toxic exposure;
4. Provide a model of responsible stewardship of environmental and community resources; and
5. Help create public awareness and education of IPM techniques.

1.4. MAIN COMPONENTS OF AN IPM PROGRAM

An IPM Program is a problem-solving method for landscape management designed to prevent and control undesirable weeds, insects, and rodents. The main components of an IPM Program are listed in Table 1.

Table 1. Main Components of an IPM Program

IPM Goal:	To control pest problems.
IPM Policy	An IPM Program must have a written policy dictating company's plan for implementing their IPM Program.
IPM Implementation:	Establishing the density of the pest population (that may be set at zero) that can be tolerated or correlated with a damage level sufficient to warrant treatment of the problem based on health, public safety, economic, or aesthetic thresholds. Treating pest problems to reduce populations below those levels established by damage thresholds using strategies that may include biological, cultural, mechanical, and chemical control methods and that must consider human health, ecological impact, feasibility, and cost-effectiveness.
IPM Monitoring	Establishing a baseline within a jurisdiction of present pests and pest damage. Evaluating the effects and efficacy of pest treatments.
IPM Training	Terracare Associates shall provide appropriate training for its employees on this IPM Program.
IPM Policy Review and Coordination	Terracare Associates may establish an internal IPM committee to develop the IPM Program and to monitor its implementation. The IPM committee may include representatives from each Branch responsible for pest or vegetation management. The IPM committee may meet periodically to evaluate progress and experiences in implementing Terracare Associates IPM Program, as well as suggest revisions to the IPM Program.

1.5. IPM POLICY

An IPM policy is a written document that serves as a guideline for companies to use as a strategy to implement their IPM Program. Terracare Associates IPM Policy has been written and reviewed by the appropriate company authorities, approved by company representatives who are responsible for implementing the main components of the IPM Program.

1.6. ROLES AND RESPONSIBILITIES

In order to establish an effective IPM Program, individual tasks will be delegated to company representatives who are responsible for implementing the main components of an IPM Program. The following are the designated roles for company managers to delegate the IPM Program: President; Executive Vice-President; Vice-President; Operations Manager; Branch Manager.

IPM Coordinator: Bill Horn, V.P.

The duties for each designated role are as follows:

The IPM Coordinator shall be responsible for:

1. Ensuring that company procedures, budget and staffing decisions support implementation of the IPM Program;
2. Providing training to ground management staff in the requirements of the IPM Program;
3. Designating managers to ensure products used by the company meet the standards outlined in the IPM Program and represent the company on the IPM Committee; and,
4. At least annually and in conjunction with the IPM Committee, report to the IPM Coordinator on the company's implementation of the IPM Program as appropriate.

The IPM Committee is responsible for:

1. Meeting on a regular basis to review and discuss pest management practices;
2. Developing, adopting and periodically reviewing the Tiered Product List (outlined in Section 2 of this IPM Program);
3. Reviewing, approving and denying exemptions to the Phased-out Pesticide approved list (outlined in Section 2 of this IPM Program);

4. Reviewing emergency pest control decisions;
5. Investigating low-risk/least hazardous alternatives to conventional treatments;
6. Assisting managers in implementing the IPM Program by developing educational information for staff about IPM plans and programs; and,
7. Conducting an annual review of the written IPM Program and recommending appropriate revisions to ensure the program meets the intended purpose and goals of IPM.

The individual IPM Committee members will be comprised of representatives from the company Branch locations.

The IPM Committee will meet on a set regular schedule. If the IPM Committee is disbanded or becomes inactive at any time during this program implementation, the responsibilities of the IPM Committee will be assigned to its successor, if any, or to the discretion of the IPM Coordinator. The IPM Committee's role is supportive of the IPM Coordinator(s).

The IPM Coordinator shall be responsible for:

1. Coordinating efforts to adopt IPM techniques;
2. Communicating with all staff on the goals and guidelines of the IPM Program;
3. Coordinating training programs for staff;
4. Facilitating meetings with the IPM Committee;
5. Tracking all pesticide use and ensuring that the information is available to the State Department of Pesticide Regulation and company employees;
6. Preparing the IPM Annual Report;
7. Coordinating with other Branches that are practicing IPM.

The Annual Report should, at a minimum:

1. Identify the types of pest problems that the company has encountered;
2. Identify the types and quantities of pesticides used by the company;
3. Identify the alternatives currently used for phased out pesticides;
4. Identify the alternatives proposed for adoption within the next 12 months;
5. Identify the exemptions currently in place and granted during the past year;
6. Identify planned changes to pest management practices; and,
7. Evaluate the effectiveness of any changes in practices implemented.

1.7. DEFINITIONS

Contract: is a binding written agreement requiring the services of an outside provider for any pest control related services.

Contractor: is a person, firm, corporation or other entity, including a governmental entity that enters into a contract with the company.

Emergency: is a pest outbreak that poses an immediate threat to public health or significant economic or environmental damage.

Exemption: is a process by which materials, not on the tiered product list, can temporarily be used, but only after all alternatives have been reviewed, evaluated, and/or implemented and only after the IPM Advisory Committee and/or the IPM Coordinator has authorized the use of the pesticide for the specific purpose. The application for an exemption shall be filed on a form specified by the IPM Advisory Committee and signed by the IPM Coordinator. The decision to approve an exemption will be based upon an evaluation of the failure of alternatives, and taking into consideration public health, environmental and financial risks.

Hazardous Material: is a chemical or mixture that may pose a physical hazard, health hazard, or environmental hazard and that is regulated under the law to control its harmful effects. This definition is not intended to be rigid or legalistic because all materials regulated in this manner merit special attention and consideration under this program.

Integrated Pest Management: is a coordinated decision-making and action process that uses the most appropriate pest control methods and strategy in an environmentally and economically sound manner to meet company and client pest management objectives. IPM is also an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties.

IPM Committee: the IPM Committee is responsible for guiding the company-wide implementation of the approved IPM Program. The IPM Committee shall consist of representatives from the company (as deemed appropriate by each Branch involved in the IPM strategy implementation.) The IPM Committee will have a set schedule for regular committee meetings throughout the year.

IPM Coordinator: is a designated individual that facilitates the IPM Program within the company and oversees the application of pesticides or contract pesticide applicators. The IPM Coordinator may appoint a person to coordinate these activities on a company-wide basis to serve as the primary point of contact. The IPM Coordinator shall be trained in the principles of low-risk IPM, safe application of pesticides and alternatives to pesticide use.

IPM Policy: is a written document that serves as a guideline for the company to use as a strategy to implement its IPM Program.

IPM Program: is a coordinated pest management approach that implements an IPM policy, management plans specific to types of sites or pests, training requirements, record keeping and evaluation practices.

Landscapes: are grounds that are actively managed such as parks, plantings lawns around public buildings, right-of-ways, watersheds, and open spaces.

Pest: is any insect, rodent, nematode, snail, weed, fungus or other form of plant or animal life that adversely interferes with the aesthetic, health, safety, environmental or economic goals of a jurisdiction. Pests shall not include viruses or microorganisms on or in a living person or animal, but shall include plant diseases.

Pesticides: are chemical agents registered as pesticides by the California Food and Agricultural Code, Section 12753 of Chapter 2 of Division 7, which can be an herbicide, insecticide, fungicide or other chemical that repels, changes the regular growth rate of, kills, or otherwise reduces levels of a targeted pest or pests.

Pesticide Free Zones: a site or area within a site designated as a "Pesticide Free Zone" in order to further reduce and eliminate pesticide use in areas of higher public exposure or areas with high environmental sensitivity. Any pesticide use deemed necessary for the protection of public areas, public safety, and the environment in these zones will only be authorized through the exemption process.

Sustainable Installation and Maintenance: principles, materials, and techniques that conserve natural resources and improve environmental quality throughout the life cycle of the landscape and its surrounding environment. Sustainable installation of landscapes incorporate methods that reduce the potential for pest problems from the start and with long-term maintenance needs in mind.

Toxicity Category I Pesticide Product: any pesticide product that meets U.S. EPA criteria for Toxicity Category I under Section 156.10 of Part 156 of Title 40 of the Code of Federal Regulations.

Toxicity Category II Pesticide Product: any pesticide product that meets U.S. EPA criteria for Toxicity Category II under Section 156.10 of Part 156 of Title 40 of the Code of Federal Regulations.

Section 2. Implementation Practices

Section 2 reviews the specific practices to be followed for pesticide selection and approval, choosing a pesticide applicator/service, and appropriate pesticide application practices such as education and training for applicators, notification of applying a pesticide, record keeping and outreach to the public.

2.1. PESTICIDE SELECTION AND APPROVAL

The IPM Coordinator(s) will make product recommendations based on a tiered risk assessment of pesticides. The IPM Coordinator will develop this tiered risk assessment of pesticides. A prioritized list of products will be developed to identify products that may be targeted for future phase-out based on review of the product's contents, precautions, need for the product, and adverse health and environmental effects. The list shall be submitted as part of the annual report. The list may be used if determined appropriate by the IPM Coordinator(s) in compliance with the emergency exemption process (see Section 2.1.d).

Criteria for developing the product list shall be based on acute and chronic toxicity of products and chemicals known to cause cancer and known to cause reproductive toxicity. Environmental impacts of the products shall also be considered.

Products on the Tiered Product List will be divided into three classifications:

- Approved Use
- Limited Use
- Banned Use

If the use of a material that is not on the Approved Use or Limited Use tier list is deemed necessary, the IPM Coordinator may apply for an emergency exemption (see Section 2.1.d).

a. Approved Use Products

The first tier classification of pesticides is the Approved Use Product tier. These pesticides have been approved for use by the IPM Coordinator(s) along with any restrictions for such use. The Approved Use Products list shall include but are not limited to:

- Insecticides, rodenticide baits and traps
- Borates, silicates, and diatomaceous earth
- Soap-based products
- Natural products on the FIFRA's 23(b) list (40 DFR part 152.25 (g)(1))¹
- Natural products on the California Certified Organic Farmers' organic list
- EPA GRAS-generally recognized as safe products pursuant to Federal EPA
- Biological controls such as parasites and predators
- Physical barriers
- Roundup
- Sluggo
- Pheromones and attractants for traps

¹ In 1996, EPA exempted certain minimum risk pesticides from FIFRA requirements if they satisfy certain conditions. EPA exempted the products described in 40 CFR section 152.25(g) in part to reduce the cost and regulatory burdens on businesses as well as the public for pesticides posing little or no risk, and to focus EPA's limited resources on pesticides which pose greater risk to humans and the environment. This exemption provision is located in section 152.25(g) of Title 40 of the Code of Federal Regulations.

b. Limited Use Products

The **IPM Coordinator** may grant a recommendation that particular pesticides not classified as the Approved Use be approved for a specific purpose. Limited use products may not be a pesticide on the Banned Use Product. The IPM Committee may grant a limited use exemption upon a finding that the requestor has:

1. Identified a compelling need to use the pesticide.
2. Made a good faith effort to find alternatives to the particular pesticide.
3. Demonstrated that effective, economic alternatives to the particular pesticide do not exist for the particular use.
4. Developed a reasonable plan for investigating alternatives to the pesticide in question during the exemption period.

c. Banned Use Products

The following high health-risk pest management products are completely banned from use in California:

1. Pesticides linked to cancer (US EPA Class A, B and C carcinogens and chemicals known to the State of California to cause cancer under Proposition 65).
2. Pesticides that cause birth defects, reproductive, or development harm (identified by the US EPA or known to the State of California under Proposition 65 as reproductive or development toxins).
3. Pesticides classified as Toxicity Category I pesticide products by the US EPA, carbonate, and organophosphate pesticides.
4. Foggers, bombs, fumigants, or sprays that contain pesticides identified by the State of California as potentially hazardous to human health (CFR 6198.5).
5. Pesticides that interfere with human hormones.

d. Emergency Exemption

A Branch Manager may apply to the IPM Coordinator for an emergency exemption to use a phased out product in the event that an emergency pest outbreak poses an immediate threat to public health or significant economic damage will result from failure to use a pesticide. The IPM Coordinator will have a list of products phased out from prior use based on their product tier system. An application for an exemption shall be filed using the material exception request application form. Appendix "B" to this document provides an example Material Exception Request for Pesticide Application Form.

The IPM Coordinator shall respond to the application in a timely manner. If the requesting department is unable to reach the IPM Coordinator, the branch manager may authorize the one-time emergency use of the required pesticide. The IPM Coordinator must notify the IPM Committee of the determination to use the pesticide prior to its application in the event that the Branch Manager is unable to make the request to the IPM Coordinator.

The IPM Committee will review the circumstances of the emergency permit issued by the IPM Coordinator. The IPM Coordinator may impose additional conditions for emergency applications such as limited use around sensitive areas housing people, wildlife habitat, and waters of the State. All pesticide applications will abide by State and Federal application law.

Establishing "Pesticide Free Zones" - A site or area within a site that is designated as a "Pesticide Free Zone" in order to further reduce and eliminate pesticide use in areas of higher public exposure or areas with high environmental sensitivity. Any pesticide use deemed necessary for the protection of public areas, public safety, and environment in these zones will only be authorized through the exemption process.

The company will base decisions to add to the list of Pesticide Free Zones upon monitoring the effectiveness of alternatives and other factors. It is the intention over time to expand these zones as time and resources allow.

2.2. PESTICIDE APPLICATOR/IPM PROVIDER SELECTION AND APPROVAL

The company will implement a process to ensure that any sub-contractor employed to conduct pest control and pesticide application on a company maintained property engages in pest control methods consistent with this IPM program. Sub-contractors will be required to follow the company's IPM policy, SOPs, and BMPs; provide evidence to the company of having received training on current IPM techniques when feasible; and, provide documentation of pesticide use on a property to the company in a timely manner. In the process of hiring a sub-contractor for IPM the sub-contractor may be required to provide a statement of qualifications for IPM services. In addition, the sub-contractor shall submit to the company an IPM implementation plan that includes:

- Types and estimated quantities of pesticides that the sub-contractor may need to apply to during it's the contracted work;
- Outline actions the sub-contractor will take to meet the IPM program to the maximum extent practicable; and
- Identify the primary IPM contact for the company.

The company shall require IPM certification from an approved IPM program such as Ecowise, Bay Friendly, or another program approved by the company. In addition, the sub-contractor will sign a contract for pesticide application services that includes the IPM implementation plan detailed above that has been approved by the company and sub-contractor prior to start of application services.

A sub-contractor, or manager on behalf of a contractor, may apply for any material application exemption authorized under the exemptions section 2.1.d of this IPM program.

2.3. IPM APPLICATION

Only persons specifically appointed by the IPM Coordinator as Pesticide Applicators will be permitted to use pesticides on company maintained landscapes. Use of pesticides by Pesticide Applicators is limited to Approved Use and Limited Use Products. Pesticide Applicators must follow regulations and label precautions.

Pesticide Applicators and company employees that could potentially be exposed to pesticides will receive IPM training and hazardous materials training for the safe use of pesticides and other grounds maintenance hazardous materials in their workplace by their supervisor or designee. As the company's IPM Program is updated and its objectives reviewed, the program staff will be trained accordingly to understand the program's periodic changes. Education will include formal classroom training, on-site and informal meetings for those employees responsible for providing pest control at least once per year. No pesticides may be used at company maintained facilities except in accordance with this IPM Program.

The company does not have the authority to regulate the use of pesticides by school districts; however, the California Healthy Schools Act of 2000 (AB 2260) has imposed requirements on California school districts regarding pesticide use in schools. Posting of notification prior to the application of pesticides is now required, and IPM is stated as the preferred approach to pest management in schools.

2.4. EDUCATION AND TRAINING

Increasing knowledge of company staff and sub-contractors who design and maintain landscapes is critical to the success of this IPM Program and a requirement of the MRP. Consequently, providing ongoing training and educational opportunities to company staff and sub-contractors regarding landscape IPM concepts, practices and products will be a priority.

The Federal Pesticide, Fungicide, and Rodenticide Act and California Title 3, Division 6, Pesticides and Pest Control Operations place strict controls over pesticide application

and handling and specify training, annual refresher, and testing requirements. The regulations generally cover; a list of approved pesticides and selected uses that are updated regularly; general application information; equipment use and maintenance procedures; and record keeping. The California Department of Pesticide Regulation and the County Agricultural Commissioner coordinate and maintain the licensing and certification programs. All company employees who apply pesticides and herbicides in “agricultural use” areas such as parks, rights-of-way and recreation areas should be properly certified in accordance with state regulations.

All staff associated with planning, construction and maintenance of landscapes shall receive an orientation to this IPM Program and their roles and responsibilities in implementing it in a written or verbal format.

All company employees who handle pesticides should be familiar with the most recent material safety data sheet (MSDS) files.

The IPM Coordinator will be responsible for coordinating training events for all pesticide applicators and company staff involved with landscape maintenance. IPM training may be coordinated through the Contra Costa Clean Water Program or through regional efforts with Bay Area Stormwater Agencies Association (BASMAA) members. The IPM Coordinator may invite speakers and arrange for other educational opportunities to assist in implementing the IPM program each year. The IPM Coordinator shall inform employees on department policies and procedures relevant to this IPM Program and keep staff current with best landscape-management practices and technologies that utilize IPM. Employees shall also be involved in identifying and implementing strategies to minimize the use of pesticides and in evaluating replacements to chemicals targeted for phase-out.

All personnel involved in pest management activities shall receive training on:

- Orientation to the IPM Program;

- Identification and lifecycles of typical northern California pests, weeds and beneficial insects; threshold levels for different types of landscapes; monitoring techniques; and strategies for successful management of these pests;
- Noxious weed identification, control and regulations;
- Pesticide laws and safety;
- Specific best management practices as appropriate.

Training will be provided by company staff, IPM consultants, IPM technical advisors and invited guest speakers. The IPM Coordinator, with assistance from any existing IPM Committee, will schedule training. Training and educational opportunities, both formal and informal, will also occur at landscape staff meetings. Managers and supervisors are not only expected to participate in the training, but to fully support involvement of their staff and sub-contractors in the training.

2.5. NOTIFICATION OF PESTICIDE APPLICATIONS

Any Branch that uses any pesticide shall comply with the following notification procedures if required by California State Law.

1. Signs shall be posted at least two (2) working days before application of the pesticide product and remain posted at least two (2) working days after application of the pesticide.
2. Signs shall be posted at every entry point where the pesticide is applied if it is applied in an enclosed area; and in highly visible locations, signs will be posted around the perimeter of the area where the pesticide is applied.
3. Signs shall be of standard design that is easily recognizable to the public and company employees.
4. Signs shall contain the name and active ingredient of the pesticide product, target pest, the date of pesticide use, the toxicity category of the pesticide

project, the name and contact number for the department responsible for the application.

5. Individual copies of posted signs shall be retained for record keeping purposes for one year.

Signs are not required in right-of-way location where public use and potential exposure is limited.

The IPM Coordinator may authorize the application of a pesticide without providing a two-day advance notification in the event of a public health emergency or to comply with worker safety requirements.

The IPM Coordinator may grant exemptions to the notification requirements for one-time pesticide uses and may authorize permanent changes in the way company Branches notify the public about pesticide use in specific circumstances (refer to Section 2.1.d for procedure). Upon finding, that good cause exists to allow an exemption pursuant to this clause, the Branch requesting the exemption shall identify specific situations in which it is not possible to comply with the notification requirements and propose alternative notification procedures. The IPM Coordinator shall review and approve the alternative notification procedure.

Pesticide use information shall be made available to staff and the public upon request. Each Branch shall maintain a list of all materials applied on a site-specific basis. The list shall be available at each Branch's main office or made available to the public upon request.

2.6. RECORD KEEPING/PROGRAM REVIEW

Annually the IPM Coordinator will gather information for the IPM Annual Report. Each user will submit a summary of the previous year's pilot projects, a timeline for implementing pilot project recommendation and viable changes at other sites, and plans for any new pilot projects including changes that can be implemented in the next fiscal

year. Pilot projects will be used to evaluate pesticide use, IPM Program costs and cost savings.

Each Branch that uses pesticides shall keep records of all pest management activities.

Each record shall include the following information:

- Target pest,
- Type and quantity of pesticide used,
- Specific location of the pesticide application,
- Date of pesticide application,
- Application equipment used,
- Prevention and other non-chemical methods of control used,
- Experimental efforts, if any;
- Exemptions granted for that application.

Each Branch that uses pesticides shall maintain a pest management record. Pest management records shall be made readily available to the public upon request.

2.7. OUTREACH TO THE PUBLIC

Efforts will be made to educate the public about reduced risk pest management goals and practices implemented under the IPM Program in the most effective manner given time and budget constraints. Various venues may be utilized for public education and information including:

- Website
- Articles in publications (newspaper and newsletters)
- Press release (as appropriate)
- IPM Program outreach campaign

The MRP requirements for public outreach include point of purchase outreach (outreach to consumers at the point of purchase), outreach to persons who use or contract for landscape pest control, and outreach to pest control operators and landscapers. These outreach activities can be coordinated through the Contra Costa Clean Water Program and other members of BASMAA.

2.8. PRECAUTIONARY PRINCIPLE

It is the policy of the company to adopt, properly implement and practice low risk/least hazardous IPM with the goal of immediately minimizing the risk of pesticide exposure to staff, the environment and the public.

This IPM Program is based on what is referred to as the "Precautionary Principle" of pest management. The guiding principles in this program are based on the following:

1. No pesticide is free from risk or threat to human health.
2. All reasonable alternative measures of pest management have been attempted and have been demonstrated to be unsuccessful.
3. Pesticides suspected of being in conflict with the mission and goals of this IPM Program shall not be used without exemption, or until it is determined that a specific product is safe for use around sensitive individuals (i.e. children, elderly asthmatics, etc.)

The Precautionary Principle should guide decision-making processes when it comes to the health and safety of company staff and the public. All aspects of the IPM Program will be in accordance with Federal and State laws and regulations.

Section 3. IPM Practices

Section 3 discusses the three main types of managerial areas concerned with IPM, their definition, common pest concerns involved, and suggested management strategies for IPM implementation. In order to design an IPM Program that will be implemented, specific IPM practices or BMPs need to be discussed. The BMPs discussed in this section are in no way comprehensive for the entire discipline of IPM. In addition, this IPM Program is a working document and will be modified as more pest information and technologies become available. This IPM Program provides a list of resources in Appendix "A" that list IPM BMPs for an IPM Program. Appendix "A" will be reviewed by the company to provide a list of IPM BMPs to begin to implement an IPM Program. In the event that stormwater regulation is updated and/or IPM practices are updated from practical experience, this document will be updated accordingly.

3.1. LANDSCAPE IPM

Landscape maintenance includes the management of pests in and around medians, rights of ways, public works, parks, open space and aquatic areas. Landscape maintenance activities include vegetation removal; herbicide and insecticide application; fertilizer application; watering; and other lawn and landscape care practices. Vegetation control typically involves a combination of chemical (herbicide) application and mechanical methods. All of these maintenance practices have the potential to contribute pollutants to the storm drain system.

The common pest concerns for landscape and turf include noxious weeds, rodents, ground squirrels, and other invasive animals that destroy the welfare of the landscape plants.

The major objectives of this BMP are to minimize the discharge of pesticides, herbicides, and fertilizers to the storm drain system and receiving waters; prevent the disposal of landscape waste into the storm drain system by collecting and properly disposing of clippings and cuttings, and educating employees and the public.

Many of the IPM protocols for turf and landscape management include:

- Protection of the storm drain system from contaminated runoff;
- Proper disposal of removed vegetation;
- Smart irrigation management to control runoff from overwatering;
- Manual weeding rather than use of chemicals/herbicides;
- Manual removal of pests of vegetation (i.e. birds and insects);
- Composting and mulching practices;
- Alternative landscaping other than turf;
- Alternative fertilization practices and products;
- Erosion control;
- Planting of native, drought resistant plants;
- Reducing pesticide/herbicide/insecticide use;
- Removal and replacement of plants laden with bacteria, parasites, and fungi;
- Prevention practices to ward off pests from landscaped areas;
- Promoting beneficial organisms to feed on pests;
- Understanding of current pests problems that exist rather than relying on a preventative schedule of applying chemicals;
- Testing of soils for proper additive application;
- Education of employees on IPM methods and inspection of contracted employees for IPM practices; and,
- Documentation and monitoring of all pesticide use.

3.2. INSTALLATION AND DEVELOPMENT IPM

Installation and development management includes landscape installation or renovation of existing landscapes. Poorly planned landscape designs may require intensive maintenance and greater reliance on pesticides for pest control than landscapes created with IPM design specifications.

Branches participating in public or private projects that include the installation of new landscapes or renovation of existing landscapes shall install the project consistent with IPM plans to ensure that, where possible, the company considers IPM measures.

In planning and installing landscapes, site objectives shall include future management and maintenance practices that protect and enhance the natural ecosystem. The installation should take into account parameters that will enhance the intended use of land and minimize pest problems; such as, types of uses, soil conditions, grading and slope, water table, drainage, proximity to sensitive areas, selection of vegetation and vector control issues. Priority shall be given to IPM strategies when installing new and renovating existing landscape areas.

Section 4. References

King County Stormwater Pollution Control Manual. Best Management Practices for Businesses. 1995. King County Surface Water Management. July. On-line: <http://dnr.metroke.gov/wlr/dss/spcm.htm>

Los Angeles County Stormwater Quality Model Programs. Public Agency Activities: http://ladpw.org/wbmd/npdes/model_links.cfm

Model Urban Runoff Program: A How-To Guide for Developing Urban Runoff Programs for Small Municipalities. Prepared by City of Monterey, City of Santa Cruz, California Coastal Commission, Monterey Bay National Marine Sanctuary, Association of Monterey Bay Area Governments, Woodward-Clyde, Central Coast Regional Water Quality Control Board. July. 1998.

Orange County Stormwater Program:

http://www.ocwatersheds.com/StormWater/swp_introduction.asp

Santa Clara Valley Urban Runoff Pollution Prevention Program. 1997 Urban Runoff Management Plan. September 1997, updated 2000.

United States Environmental Protection Agency (USEPA). 2002. Pollution Prevention/Good Housekeeping for Municipal Operations Landscaping and Lawn Care. Office of Water. Office of Wastewater Management. On-line:

http://www.epa.gov/npdes/menuofbmps/poll_8.htm

California's Nonpoint Source Program Plan: <http://www.swrcb.ca.gov/nps/index.html>

King's County: <ftp://dnr.metrokc.gov/elr/dss/spcm/Chapter%203.pdf>

Orange County Stormwater Program:

http://www.ocwatersheds.com/StormWater/smp_introduction.asp

Mobile Cleaners Pilot Program: Final Report. 1997. Bay Area Stormwater Management Agencies Association (BASMAA): <http://www.basmaa.org/>

Pollution from Surface Cleaning Folder. 1996. Bay Area Stormwater Management Agencies Association (BASMAA): <http://www.basmaa.org/>

San Diego Stormwater Co-permittees Jurisdictional Urban Runoff Management Program (URMP):

<http://www.projectcleanwater.org/pdf/Model%20Program%20Municipal%20Facilities.pdf>

Appendix A. Resources

City of Brentwood Integrated Pest Management Program

www.ci.brentwood.ca.us/

www.stopwaste.org or 510-444-SOIL

UCCE Cooperative Extension Alameda 1131 Harbor Bay Parkway, Suite 131 Alameda CA 94502

Alameda County Master Gardener Program 510-639-1275 <http://acmg.ucdavis.edu>

Useful Gardening Websites:

Pests, Diseases, and Weeds:

www.ipm.ucdavis.edu

UC Guide to Healthy Lawns:

www.imp.usdavis.edu/tools/turf

UC Home Orchard Information:

<http://homeorchard.ucdavis.edu/>

UC Vegetable and Research Information:

<http://vric.ucdavis.edu/>

Pests of Landscape Trees and Shrubs

<http://www.ipm.ucdavis.edu/IPMPROJECT>

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

07/23/2014														
07/24/2014														
07/25/2014														
07/26/2014														
07/27/2014														
07/28/2014														
07/29/2014														
07/30/2014														
07/31/2014														
TOTAL:					00,000									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

08/23/2014														
08/24/2014														
08/25/2014														
08/26/2014														
08/27/2014														
08/28/2014														
08/29/2014														
08/30/2014														
08/31/2014														
TOTAL:					00,000									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

09/23/2014														
09/24/2014														
09/25/2014														
09/26/2014														
09/27/2014														
09/28/2014														
09/29/2014														
09/30/2014														
TOTAL:					00,000									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

10/23/2014														
10/24/2014														
10/25/2014														
10/26/2014														
10/27/2014														
10/28/2014														
10/29/2014														
10/30/2014														
10/31/2014														
TOTAL:					00,000									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

11/23/2014														
11/24/2014														
11/25/2014														
11/26/2014														
11/27/2014														
11/28/2014														
11/29/2014														
11/30/2014														
TOTAL:					00,000									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

12/23/2014														
12/24/2014														
12/25/2014														
12/26/2014														
12/27/2014														
12/28/2014														
12/29/2014														
12/30/2014														
12/31/2014														
TOTAL:					00,000									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

01/24/2015														
01/25/2015														
01/26/2015														
01/27/2015														
01/28/2015														
01/29/2015														
01/30/2015														
01/31/2015														
TOTAL					12,210									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

02/23/2015														
02/24/2015														
02/25/2015														
02/26/2015														
02/27/2015														
02/28/2015														
TOTAL					08,220									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

03/23/2015														
03/24/2015														
03/25/2015														
03/26/2015														
03/27/2015														
03/28/2015														
03/29/2015														
03/30/2015														
03/31/2015														
TOTAL					24,405									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

04/24/2015														
04/25/2015														
04/26/2015														
04/27/2015														
04/28/2015														
04/29/2015														
04/30/2015														
TOTAL:					56,730									

Comments: ND = < 0.050 mg/L - This is below the operating range of the colorimeter for chlorine residual.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

Date	Location	Cl ₂ - Daily Average	Color Y/N	# of Flushes	Flow Total - Gallons	pH	Conductivity	Turbidity NTU	D.O. mg/L	Temp. ° F	BOD mg/L	TSS mg/L	Sett. Solids	Operator Initial
05/01/2015														
05/02/2015														
05/03/2015														
05/04/2015														
05/05/2015														
05/06/2015														
05/07/2015														
05/08/2015														
05/09/2015														
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05/16/2015														
05/17/2015														
05/18/2015														
05/19/2015														
05/20/2015														
05/21/2015														
05/22/2015														
05/23/2015														

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

05/24/2015														
05/25/2015														
05/26/2015														
05/27/2015														
05/28/2015														
05/29/2015														
05/30/2015														
05/31/2015														
TOTAL					00,000									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.

WATER FLUSHING MONITORING REPORT
City of Brentwood, 2201 Elkins Way, Brentwood, CA 94513
LOW THREAT GENERAL ORDER # R5-2013-0074-045

06/23/2015														
06/24/2015														
06/25/2015														
06/26/2015														
06/27/2015														
06/28/2015														
06/29/2015														
06/30/2015														
TOTAL:					00,000									

Comments: ND = <0.050 - This is below the operating range of the colorimeter.