

Municipal Regional Stormwater National Pollution Discharge Elimination System (NPDES) Permit Status Update

Kerrie Romanow, Director
Rajani Nair, P.E., Deputy Director
Environmental Services, Watershed Protection

Transportation and Environment Committee
November 6, 2023
Item d 3



Environmental Services



Delivering world-class utility services and programs
to improve our health, environment, and economy.

Municipal Regional Stormwater Permit

Agenda

- Overview of Key Provisions accomplishments and next steps
- Summary of critical milestones and needs

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

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



Municipal Regional Stormwater Permit Provisions – Effective July 1, 2022

Permit Provision		City Departments										
		ESD	DOT	Housing	PBCE	PRNS	PW	Airport	Fire	OED	Finance	CMO Budget
C.2	Municipal Operations	✓	✓			✓	✓					
C.3	New Development and Redevelopment (GSI)	✓	✓	✓	✓		✓	✓				
C.4	Industrial and Commercial Site Controls	✓										
C.5	Illicit Discharge and Detection Elimination	✓	✓						✓			
C.6	Construction Site Control	✓					✓					
C.7	Public Information and Outreach	✓				✓						
C.8	Water Quality Monitoring	✓										
C.9	Pesticides Toxicity Control	✓	✓			✓	✓	✓				
C.10	Trash Load Reduction	✓	✓	✓	✓	✓						
C.11, C.12	Mercury and PCBs Controls	✓	✓		✓		✓			✓		
C.13	Copper Controls	✓										
C.15	Exempted and Conditionally Exempted Discharges	✓	✓		✓				✓			
C.17	Discharges Associated with Unsheltered Homeless Populations			✓		✓						
C.20	Cost Reporting	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
C.21	Asset Management	✓	✓	✓	✓	✓	✓	✓	✓		✓	
C.22	Annual Reports	✓	✓	✓	✓	✓	✓	✓	✓	✓		

C.3 New and Redevelopment & Green Stormwater Infrastructure (GSI)

■ Accomplishments To Date:

- Updated Title 20, Council Policies
- More stringent GSI requirements became effective July 1, 2023:
 - Approximately 56% of private development projects submitted to the City after July 1, 2023 may be required to implement GSI
 - River Oaks Regional Stormwater Capture GSI project estimated to complete by Summer 2024
- C.3 Amendment – effective November 1, 2023
 - Temporary Emergency Housing Projects exempt from GSI
 - Updated Affordable Housing formula for treatment credit

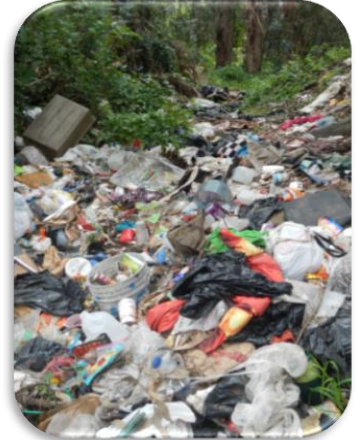
■ Next Steps:

- Evaluate Alternative Compliance needs
- Determine an appropriate in-lieu fee payment system



C.10 Trash Load Reduction and C.17 Discharges Associated with Unsheltered Homeless Populations

- Accomplishments To Date:
 - Achieved 90% Trash Load Reduction by June 30, 2023 due date
 - Long-Term Trash Plan – submitted September 30, 2023
 - Direct Discharge Program – resubmitted plan twice on October 2, 2023 (awaiting approval)
 - Regional C.17 Best Practices Report – submitted September 30, 2023
- Next Steps:
 - Long Term Trash Plan – Need funding to implement structural control by June 30, 2025 to be 100% compliant
 - Full Trash Capture
 - Private Lands
 - Direct Discharge
 - Additional funding for services and housing needs for unsheltered populations living in waterways
 - Minimize sanitary discharges into storm drains from lived-in vehicles



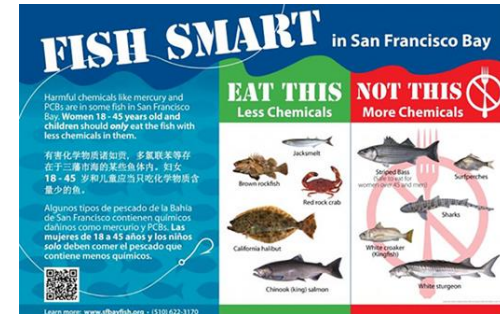
C.12 Polychlorinated Biphenyls (PCBs)

■ Accomplishments To Date:

- Submitted Regional Control Measure Plan – March 2023
- 8 Source Properties identified
- Moderate areas identified
- Updated Municipal Codes (Title 15) and permit process for PCBs-containing materials from building demolitions

■ Next Steps:

- Respond to Water Board comments on the Regional Control Measure Plan
- Determine best approach - Refer to Water Board or City to directly enforce on identified 8 Source Properties
- Additional Monitoring, Investigation, and Enforcement of 22 properties in Moderate areas
- Implement enhanced O&M in Old Industrial Areas



C.15.b.iii. Emergency Discharges of Firefighting Water and Foam

■ Accomplishments To Date:

- Fire and ESD participated in Biannual Regional Working Group Meetings
- Reviewed and began updating existing Emergency Firefighting Runoff Management policies

Next Steps:

- Develop regional approach to large industrial site
- Finalize runoff procedural manuals, notification procedures, and policies
- Submit Regional BMP Report to the Water Board – September 30, 2025





C.20 Cost Reporting and C.21 Asset Management

■ Accomplishments To Date:

- Participated in development of Bay Area regional cost reporting framework
- Submitted Bay Area regional cost reporting framework - June 30, 2023
- Provided feedback for State Water Board draft cost reporting policy

■ Next Steps:

- Initiate cost framework into City budget/fiscal tracking
- Submit annual cost analysis of stormwater programs starting with FY 24-25
- Seek funding to initiate asset management plan due by June 30, 2025 and implementation starting July 1, 2025



Critical Milestones and Needs

- Awaiting Water Board approval for the Direct Discharge Plan
- Prepare and submit remaining required deliverables
 - Update PCBs Control Measures Plan
 - Assess and implement Citywide Cost Reporting requirements
 - Evaluate approach for Asset Management requirements
- Seek comprehensive funding to implement for required compliance actions

Municipal Regional Stormwater National Pollution Discharge Elimination System (NPDES) Permit Status Update

Kerrie Romanow, Director

Rajani Nair, P.E., Deputy Director

Environmental Services, Watershed Protection

Transportation and Environment Committee

November 6, 2023

Item d 3



Environmental Services



Delivering world-class utility services and programs
to improve our health, environment, and economy.