IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SAN FRANCISCO BAYKEEPER,

Plaintiff,

v.

UNITED STATES COAST GUARD SECTOR SAN FRANCISCO, *et al.*,[1]

Defendants

Case No. 3:18-cv-06858-EMC

[PROPOSED] CONSENT DECREE

[1] Pursuant to Fed. R. Civ. P. 25(d), Rear Admiral Peter W. Gautier's successor, Rear Admiral Brian K. Penoyer, Commander, Eleventh Coast Guard District, is automatically substituted as a Defendant in this case.

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WHEREAS, on November 13, 2018, Plaintiff San Francisco Baykeeper ("Baykeeper") filed a complaint for declaratory and injunctive relief in this Court alleging that Defendants United States Coast Guard Sector San Francisco and Rear Admiral Brian K. Penoyer, in his official capacity as Commander, Eleventh Coast Guard District (collectively, the "Coast Guard"), are in violation of sections 301 and 402 of the Clean Water Act ("CWA" or "Act"), 33 U.S.C. §§ 1311, 1342, Case No. 3:18-cv-06858-EMC (N.D. Cal.) (Dkt. No. 1) (the "Complaint");

WHEREAS, the United States owns the United States Coast Guard Sector San Francisco facility at 1 Yerba Buena Island, San Francisco, California, 94130 (the "Facility");

WHEREAS, CWA section 301(a), 33 U.S.C. § 1311(a), makes it unlawful for a person to discharge pollutants from a point source into waters of the United States, except as authorized by a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to CWA section 402, 33 U.S.C. § 1342;

WHEREAS, CWA section 402, 33 U.S.C. § 1342, establishes the NPDES program and authorizes the United States Environmental Protection Agency ("EPA") and EPA-authorized states to issue permits governing the discharge of pollutants from point sources into waters of the United States and CWA section 402(p), 33 U.S.C. § 1342(p) requires that NPDES permits be issued for storm water discharges "associated with industrial activity";

WHEREAS, 40 C.F.R. § 122.26(b)(14)(xi) provides that "[f]acilities under Standard Industrial Classifications 20, 21, 22, 23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 311), 323, 34 (except 3441), 35, 36, 37 (except 373), 38, 39, and 4221-25" and are considered to be engaging in "industrial activity";

WHEREAS, the Facility has "stormwater discharges associated with industrial activity" as defined by 40 C.F.R. §§ 122.26(b)(14)(viii) and 122.26(b)(14)(xi);

WHEREAS, pursuant to CWA section 402(p)(4), 33 U.S.C. § 1342(p), dischargers of stormwater associated with industrial activity are required to seek coverage under a promulgated general permit or seek individual permit coverage, *see also* 40 C.F.R. §§ 122.26(a)(1)(ii) and 122.26(c);

WHEREAS, the State of California has an EPA-authorized NPDES program and issues permits, including industrial storm water permits, through its State Water Resources Control Board ("SWRCB") and nine Regional Water Quality Control Boards ("RWQCB");

WHEREAS, on April 17, 1997, SWRCB adopted General Permit No. CAS000001 for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities, Water Quality Order No. 97-03-DWQ, which was in effect through June 30, 2015, and subsequently revised by the SWRCB on April 1, 2014, Water Quality Order No 2014-0057-DWQ, which became effective on July 1, 2015 (hereinafter, the "General Permit");

WHEREAS, on June 24, 2015, the Coast Guard submitted a Notice of Intent for coverage under the General Permit;

WHEREAS, on or about September 4, 2018, Baykeeper sent a notice of intent to sue to the United States Coast Guard Sector San Francisco and Rear Admiral Gautier, alleging various violations of the General Permit (the "Notice of Intent") (Dkt. No. 1-1);

WHEREAS, for purposes of this Consent Decree, activities under Standard Industrial Classification 37 are conducted at Facility;

WHEREAS, Baykeeper alleges that during the five (5) years preceding the filing of the Complaint, the Coast Guard violated the terms and conditions of the General Permit;

WHEREAS, the Parties have engaged in settlement negotiations in an attempt to resolve Baykeeper's claims;

WHEREAS, since receiving the Notice of Intent, the United States Coast Guard has begun planning a nationwide review of buoy overhaul and painting operations for the purpose of identifying and reducing environmental risks which could bear upon the alleged CWA violations in the Notice of Intent;

WHEREAS, since receiving the Notice of Intent, the Coast Guard has also established a full-time Environmental Protection Specialist position to oversee environmental programs at Coast Guard Sector San Francisco, including storm water permit compliance;

WHEREAS, the Parties desire to completely and finally resolve all the claims alleged in Baykeeper's Notice of Intent and Complaint without further litigation;

WHEREAS, this Consent Decree is entered into between the Parties for the purposes of settlement and does not constitute an admission by the Coast Guard of any fact or legal theory or of any violation of federal law or regulation;

WHEREAS, the Parties agree that this Consent Decree has been negotiated by the Parties in good faith, that settlement of this matter will avoid prolonged and complicated litigation between the Parties, and that this Consent Decree is fair, reasonable, and in the public interest;

THEREFORE, with the consent of the Parties to this Consent Decree, it is ORDERED, ADJUDGED, AND DECREED:

I. JURISDICTION AND VENUE

1. Baykeeper alleges that this Court has jurisdiction to enter this Consent Decree pursuant to 28 U.S.C. §§ 1331, 2201, and 33 U.S.C. § 1365(a)(1).

2. Baykeeper alleges that venue lies in the Northern District of California pursuant to 33 U.S.C. § 1365(c)(1), because the source of the alleged violations is located within this judicial district.

3. Solely for purposes of this Consent Decree and any action to enforce this Consent Decree, the Coast Guard consents to this Court's jurisdiction and to venue in this judicial district and will not challenge Baykeeper's standing to enforce the Coast Guard's obligations under this Consent Decree.

II. APPLICABILITY

4. The provisions of this Consent Decree shall apply to, inure to the benefit of, and be binding upon Baykeeper and its officers, directors, employees, and agents, and any successors in interest and assigns, and the Coast Guard as to matters that might reasonably include compliance with any provisions of this Consent Decree.

III. DEFINITIONS

5. Terms used in this Consent Decree that are defined in the Act or in regulations promulgated pursuant to the Act shall have the meanings assigned to them in the Act or such

regulations, unless otherwise provided in this Consent Decree. Whenever the terms set forth below are used in this Consent Decree, the following definitions shall apply:

a. "Complaint" shall mean the Complaint filed by Baykeeper in this action;

b. "Consent Decree" or "Decree" shall mean this Consent Decree and all attachments hereto and all modifications to this Consent Decree;

c. "Day" shall mean a calendar day unless expressly stated to be a working day. In computing any period of time under this Consent Decree, where the last day would fall on a Saturday, Sunday, or federal holiday, the period shall run until the close of business of the next working day;

d. "Facility" shall mean designated areas of the United States Coast Guard Sector San Francisco, located at 1 Yerba Buena Island, San Francisco, California, 94130, subject to the General Permit;

e. "Maintenance and repair work" shall mean routine repair work at the Facility, including routine maintenance and repair work conducted on small boats under forty feet.

f. "Notice of Intent" shall mean the notice of intent to sue letter dated September 4, 2018 transmitted by Baykeeper in this action (Dkt. No. 1-1);

g. "Paragraph" shall mean a portion of this Decree identified by an Arabic numeral;

h. "Parties" shall mean San Francisco Baykeeper and the Coast Guard; and

i. "Qualifying Storm Event" shall be defined pursuant to the General Permit;

j. "Section" shall mean a portion of this Decree identified by a Roman numeral; and

k. "SWPPP" shall mean the Stormwater Pollution Prevention Plan for the Facility.

IV. INJUNCTIVE RELIEF

6. **Construct Permanent Boat Wash:** The Coast Guard shall complete construction of the permanent boat wash system generally consistent with Appendix A.

7. **Best Management Practices**: Within 120 days of the Effective Date, the Coast Guard shall amend the SWPPP to include the following updated or additional Best Management Practices ("BMP"). The BMPs that are to be included in the SWPPP are not incorporated as obligations under this Consent Decree.

a. **Buoy Chain Storage**: To the maximum extent practicable, the Coast Guard shall store buoy chains indoors.

b. **Operations and Maintenance BMPs**:

i. Conduct maintenance and repair work indoors to the maximum extent practicable. At the start of a storm event, to the maximum extent practicable, the Coast Guard will cease outdoor work likely to increase stormwater-borne pollutants and immediately implement administrative and environmental controls (i.e., stop work notice, shop vacuuming, temporary drain covers, and sorbent socks) to prevent non-stormwater discharges.

ii. On a monthly basis between July 1 and September 30, and on a weekly basis between October 1 and June 30, inspect areas where industrial materials or activities are exposed to stormwater to ensure proper implementation and maintenance of operational procedures and control measures.

iii. On a daily basis, the Coast Guard will observe the Facility's bilge water tank system and document the observation in the unit watch stander log.

c. **Intensive Pollutant Source Reduction**: On a monthly basis between July 1 and September 30, and on a weekly basis between October 1 and June 30, conduct shop vacuuming of dust and debris in stormwater exposed drainage areas including entryways (e.g., roll-up doors) and indoor shop structures to reduce total suspended solids, iron, aluminum, copper, and zinc in the following areas within the Industrial Area outlined in green on site map attached as Appendix B1[2]:

i. Drainage Area 1: starting with the removal of inutile materials and involving hand shop vacuuming around Building 11 (buoy sandblast and spray booth), the bag

[2] Attached Appendix B2 provides additional detail for Drainage Areas 2 and 3.

house area located next to the Building 11, the southwest corner (bone yard and solvent still), and north and south paint booths.

ii. Drainage Area 1: in and around Building 10 (the buoy shed), around Building 1 (engineering office and shops), around Building 6 (carpenter storage), around Building 4 (carpenter shop), around Building 5 (power building and compressor), around the aboveground storage tank, and around Building 2 (shops and training).

iii. Drainage Area 1: including the SE-1 stormwater sampling location and around buoys.

iv. Drainage Area 1: around Building 3 (shops and Station San Francisco berthing).

v. Drainage Area 3: around Building 15 (substation #2), around CB-08, around the Building 16 (patrol boat storage), Building 17 (satellite waste accumulation).

vi. Drainage Areas 2 and 4: around the hazardous materials storage lockers, around the 90-day hazardous waste storage area, and around CB-05.

d. **Overhaul of Buoys Off-Site**: The Coast Guard will no longer conduct routine buoy maintenance (e.g., sandblasting and welding) at the Facility.

e. **Small Boat Washing**: The Coast Guard shall operate and maintain the Permanent Boat Wash described in Paragraph 6 as follows:

i. Boat wash operators shall receive training in operation of the system prior to operating or maintaining the boat wash and annually thereafter;

ii. After each use of the boat wash basin, the boat wash basin will be rinsed to remove any residual material that has not been manually transferred to storage containers, into the drain grates. The residual material will be rinsed into the drain channels towards and into the basin chamber; and

iii. The basin chamber will be cleaned annually by a vacuum truck or similar method on an annual basis during the summer dry season.

f. **Pre-Rain Protocol**: On a weekly basis, the Coast Guard will monitor the National Weather Service Seven Day Forecast for San Francisco, California and shall institute

the following pre-rain protocol when a 0.125 inch per hour precipitation forecast is predicted for the active permitted industrial facility during scheduled facility operating hours:

i. Prevent or minimize handling of materials or wastes likely to increase stormwater-borne pollutants that can be readily mobilized by contact with storm water during a storm event;

ii. Contain all stored non-solid materials or wastes (e.g., particulates, powders, shredded paper, etc.) that can be transported or dispersed by the wind or contact with storm water;

iii. Cover waste disposal containers and material storage containers that contain materials likely to increase stormwater-borne pollutants when not in use;

iv. Divert run-on and stormwater generated from within the Facility away from all stockpiled materials;

v. Observe and clean as appropriate, any outdoor material or waste handling equipment or containers that can be contaminated by contact with industrial materials or wastes.

g. **Material Storage**: The Coast Guard shall implement the following storage BMPs:

i. Cover all stored materials that can be readily mobilized by contact with storm water in the delineated industrial area. The Coast Guard will cover material and equipment stored outside that is likely to increase stormwater-borne pollutants at the Facility with tarps or other appropriate cover to minimize metal concentrations.

ii. Removal and storage of non-functioning equipment and waste materials: The Coast Guard will either remove or store these materials under cover. The Coast Guard will conduct a monthly walk through to determine if additional materials should be removed.

8. **Training**: Within thirty days after the Effective Date, the Coast Guard shall implement the following training protocols at the Facility: At the time of civilian employment or military assignment and annually thereafter, with respect to Facility engineering personnel who

work on activities that are likely to increase stormwater-borne pollutants within the designated industrial area of the Facility, provide training on proper procedures for managing stormwater discharges associated with such industrial activities.

9. **Amended SWPPP**: Within forty-five days of the Effective Date, the Coast Guard shall transmit the SWPPP attached as Appendix C to the RWQCB as provided for in paragraph I.I.54 of the 2015 General Permit.

10. **Site Visits**:

a. Within thirty (30) days of the Effective Date, the Coast Guard will schedule a site visit for Baykeeper to confirm construction of the boat wash system. The site visit will be held at a mutually agreeable time and date.

b. Within six months of the Effective Date, the Coast Guard will notify Baykeeper of the opportunity for a second site visit to confirm implementation of the BMPs described in Paragraph 7. The site visit will be held at a mutually agreeable time and date.

c. During the site visits described in Paragraphs 10.a and 10.b, Baykeeper will be accompanied by a Coast Guard escort and shall comply with all safety and security instructions provided to Baykeeper by the Coast Guard. Photos and videos taken during the site visit may be subject to review by the Coast Guard during the site visit.

V. FORCE MAJEURE

11. For purposes of this Consent Decree, "force majeure" is defined as any event arising from one or more causes beyond the Coast Guard's control, including the control of the Coast Guard's employees, agents, contractors, consultants, and any other person acting on the Coast Guard's behalf or pursuant to the Coast Guard's authorization, which delays or prevents the Coast Guard's performance of or compliance with any obligation or requirement of this Consent Decree, despite the Coast Guard's best efforts otherwise to fulfill the obligation or meet the requirement in question. "Best efforts" includes anticipating and/or addressing the effects of any force majeure event to prevent or minimize any resulting delay, non-performance or non-compliance. "Lack of availability," when used in this Section, means that the Coast Guard is unable to perform the obligations in and/or meet the requirements of, this Consent Decree while

complying with all applicable statutes and regulations, including but not limited to the Federal Acquisition Regulations ("FAR"). The events listed below are "force majeure" events if they meet the criteria above. Other events also may be force majeure events if they meet the criteria above.

a. acts of God, fire, war, insurrection, or civil disturbance;

b. restraint by court order;

c. any strike or similar work stoppage resulting from labor dispute; or

d. inability lawfully to obtain after exercise of reasonable diligence, any necessary authorizations, approvals, permits, or licenses due to action or inaction of any governmental agency or authority other than the Coast Guard or its authorized contractors. The Coast Guard shall not be deemed to have acted with reasonable diligence within the meaning of this Paragraph unless the action for which an authorization, approval, permit or license is sought would comply with all applicable federal, state and local laws and regulations, including but not limited to, applicable federal and state water quality standards.

12. If any event occurs that the Coast Guard reasonably believes qualifies as a force majeure event, the Coast Guard shall notify Baykeeper in writing, in accordance with Section XI (Notices) of the Consent Decree, no later than twenty one (21) days after the date on which the Coast Guard first knew, or in the exercise of due diligence reasonably should have known, of such event. Such notice shall include a discussion of: (i) each requirement of this Consent Decree that has been affected; (ii) how and why such requirement has been affected, including the reasons for and estimated length of the delay, non-performance or non-compliance; (iii) any measures the Coast Guard has taken or intends to take to prevent or minimize the delay, non-performance or non-compliance; and (iv) a schedule for implementation of such measures. The Coast Guard shall include with such notice all available documentation, that is not protected by an applicable legal privilege or exemption from disclosure, supporting the Coast Guard's claim that the delay, non-performance or non-compliance is or was attributable to a force majeure event(s). If Baykeeper does not concur that the Coast Guard's delay, non-performance or non-compliance is attributable to a force majeure event, then Baykeeper shall notify the Coast Guard

in accordance with the Dispute Resolution provisions in Section VIII (Dispute Resolution) of this Consent Decree.

VI. ANTI-DEFICIENCY ACT

13. Notwithstanding any other provision of this Consent Decree, the obligations of this Consent Decree are subject to the availability of appropriated funds. No provision of this Consent Decree shall be interpreted as or constitute a commitment or requirement that the United States obligate or pay funds in contravention of the Anti-Deficiency Act, 31 U.S.C. § 1341.

VII. LAPSE IN APPROPRIATIONS

14. If a lapse in appropriations occurs within one hundred and twenty (120) days prior to any deadline set forth above in in Paragraphs 6-10, that deadline shall be extended automatically one day for each day of the lapse in appropriations. Nothing in this paragraph shall preclude the Coast Guard from seeking an additional extension, either by written agreement or court order, pursuant to the procedures of Section XIV (Modification).

VIII. DISPUTE RESOLUTION

15. Except as provided for in Section V (Force Majeure), the dispute resolution procedure provided for in this Section VIII shall be the exclusive mechanism to resolve disputes and disagreements arising under or with respect to this Consent Decree. The Parties shall make all reasonable efforts to resolve their disputes and disagreements regarding the meaning of, compliance with and/or implementation of this Consent Decree informally and in good faith prior to seeking any relief from the Court.

16. If Baykeeper has a dispute concerning the meaning of, compliance with, and/or implementation of this Consent Decree, Baykeeper shall send a written notice to the Coast Guard that specifies the nature of the dispute and requests resolution of the dispute. Written notice shall be provided pursuant to Section XI (Notices) below.

17. Upon receipt of written notice pursuant to Paragraph 16, the Coast Guard shall either send Baykeeper written notice within 45 days of receipt pursuant to Paragraph 16 that it intends to cure and shall cure the alleged deficiency within 90 days; or, if the Coast Guard is unable to cure the alleged deficiency or disputes the alleged deficiency, the Coast Guard shall

provide written notice to this effect to Baykeeper within 45 days of receipt of the notice pursuant to Paragraph 16.

18. If the Coast Guard disputes the alleged deficiency, the Parties shall initiate informal negotiations to resolve the dispute. Such period of informal negotiations shall not extend beyond 60 days from the date on which the Coast Guard requests such negotiations, unless the Parties agree otherwise in writing. If the Coast Guard fails to remedy the alleged violation or reach an agreement with Baykeeper during the 60-day informal negotiation period, concerning the alleged violation, Baykeeper may file a motion seeking judicial enforcement and specific performance of this Consent Decree, subject to Paragraphs 19 and 20 below.

19. Baykeeper agrees not to seek judicial enforcement of this Consent Decree for alleged delays or non-performance of or non-compliance with requirements of the Consent Decree unless all reasonable efforts, as set forth in this Section, to resolve the dispute informally between the Parties have failed and the Coast Guard has unreasonably delayed compliance with, or unreasonably failed to perform their obligations under or to comply with, the obligations and requirements of this Consent Decree.

20. In addition to the foregoing pre-requisites for judicial enforcement, civil contempt sanctions shall be available only with respect to an alleged violation of an Order from the Court requiring specific performance or compliance with respect to, or other Court order requiring action to remedy, an alleged violation of this Consent Decree.

IX. EFFECT OF SETTLEMENT/RESERVATION OF RIGHTS

21. This Consent Decree resolves any and all claims that have been brought by Baykeeper under the CWA with respect to the Facility, as alleged in the Notice of Intent and Complaint, and Baykeeper releases any and all such claims.

22. This Consent Decree does not limit or affect the rights of any Party against any third party, not a party to this Consent Decree, nor does it limit the rights of any third party, not a party to this Consent Decree, against the Coast Guard, except as otherwise provided by law.

23. Except as otherwise provided in this Consent Decree, Baykeeper reserves all legal and equitable remedies available to enforce the provisions of this Consent Decree under any

federal, state or local law or regulation, and the Coast Guard reserves all legal and equitable defenses to such enforcement under any federal, state or local law or regulation.

X. COSTS OF LITIGATION

24. **Reimbursement of Costs of Litigation:** The Coast Guard shall pay to Baykeeper the sum of $49,714.81, within one hundred and twenty (120) days after the Effective Date of this Consent Decree. Within seven (7) days of the Effective Date, Baykeeper will provide the following payment and deposit information to the Department of Justice:

a. Electronic Funds Transfer Payable to;

b. Bank name;

c. Bank address;

d. ABA Routing number;

e. Account number;

f. Name and Type (Checking or Savings) of Account; and

g. Taxpayer identification number.

25. Baykeeper and the Coast Guard hereby release any and all claims raised in the Notice of Intent and Complaint for costs of litigation, attorney fees, expert fees, and other costs or fees incurred or claimed accrued through the Effective Date of this Consent Decree.

XI. NOTICES

26. All notices, submissions and communications made pursuant to this Consent Decree shall reference the title, caption and case number of this action, and shall be sent via certified U.S. Mail, overnight express mail, hand delivery or electronic means to the recipients and addresses below. Notices shall be considered delivered upon receipt and compliance periods requiring notices shall commence starting with the date of receipt.

a. For Baykeeper:

San Francisco Baykeeper
Attention: Nicole Sasaki, Staff Attorney
1736 Franklin Street, Suite 800
Oakland, California 94612
Email: nicole@baykeeper.org

b. For the Coast Guard:

Ms. Maya Nair
Legal Service Command Alameda
Coast Guard Island Bldg. 54A
Alameda, CA 94501-5100
Email: Maya.A.Nair2@uscg.mil

c. For the Department of Justice:

U.S. Department of Justice
Environment & Natural Resources Division
Chief, Environmental Defense Section
4 Constitution Square
150 M Street, N.E.
Suite 4.149
Washington, D. C. 20002
Email: Leslie.Hill@usdoj.gov

27. Any Party may, by written notice to the other Party, change its designated notice recipient or notice address provided above.

28. Notices submitted pursuant to this Section shall be deemed submitted upon mailing, unless otherwise provided in this Consent Decree or by mutual agreement of the Parties in writing.

XII. EFFECTIVE DATE

29. The Effective Date of this Consent Decree shall be the date upon which this Consent Decree is entered by the Court.

XIII. RETENTION OF JURISDICTION

30. The Court shall retain jurisdiction of this matter for all purposes, including jurisdiction to resolve any disputes arising under this Consent Decree and to enforce or modify this Consent Decree, until termination of the Consent Decree pursuant to Section XV (Termination).

XIV. MODIFICATION

31. The terms of this Consent Decree may be modified only by a subsequent written agreement signed by the Parties. Where the modification constitutes a material change to any term of this Consent Decree, it shall be effective only upon approval by the Court.

XV. TERMINATION

32. This Consent Decree shall automatically terminate, unless one of the Parties has invoked Dispute Resolution in accordance with Section VIII (Dispute Resolution) of the Consent Decree, after the Coast Guard has complied with all requirements of Section IV (Injunctive Relief), the site visits required by Paragraphs 10.a and 10.b have been completed, and the payment required by Paragraph 24 is effectuated.

XVI. SIGNATORIES/SERVICE

33. Each undersigned representative of the Baykeeper and the Coast Guard certify that he or she is fully authorized to enter into the terms and conditions of this Consent Decree and to execute and legally bind the Party he or she represents.

34. This Consent Decree may be signed in counterparts, and its validity shall not be challenged on that basis.

XVII. INTEGRATION

35. This Consent Decree constitutes the final, complete, and exclusive agreement and understanding between the Parties with respect to the settlement embodied in the Consent Decree and supersedes all prior agreements and understandings, whether oral or written, concerning the settlement embodied herein. No other document, nor any representation, inducement, agreement, understanding, or promise, constitutes any part of this Consent Decree or the settlement it represents, nor shall it be used in construing the terms of this Consent Decree.

XVIII. EFFECT OF CONSENT DECREE

36. This Consent Decree is not a defense to future allegations of the Coast Guard has violated the CWA at the Facility.

XIX. FINAL JUDGMENT

37. Upon entry by the Court, this Consent Decree shall constitute a final judgment, from which no appeal shall be taken except with respect to subsequent orders of the Court.

XX. APPENDICES

38. The following Appendices are attached to and incorporated into this Consent Decree:

Appendix A: Boat Wash Plan

Appendix B1: Site Diagram

Appendix B2: Detailed Site Diagram (Drainage Areas 2 and 3)

Appendix C: Stormwater Pollution Prevention Plan dated August, 2020

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FOR THE UNITED STATES COAST GUARD

Date: October 15, 2020

LESLIE M. HILL (D.C. Bar No. 476008)
U.S. Department of Justice
Environment & Natural Resources Division
Environmental Defense Section
4 Constitution Square
150 M Street, N.E.
Suite 4.149
Washington, D. C. 20002
Tel: (202) 514-0375
Leslie.Hill@usdoj.gov

Attorney for Defendants

APPROVED AS TO CONTENT

Date: 10/15/20

SAN FRANCISCO BAYKEEPER

By: _____
Sejal Choksi-Chugh
Executive Director, San Francisco Baykeeper

APPROVED AS TO FORM

Date: 10/15/2020

SAN FRANCISCO BAYKEEPER

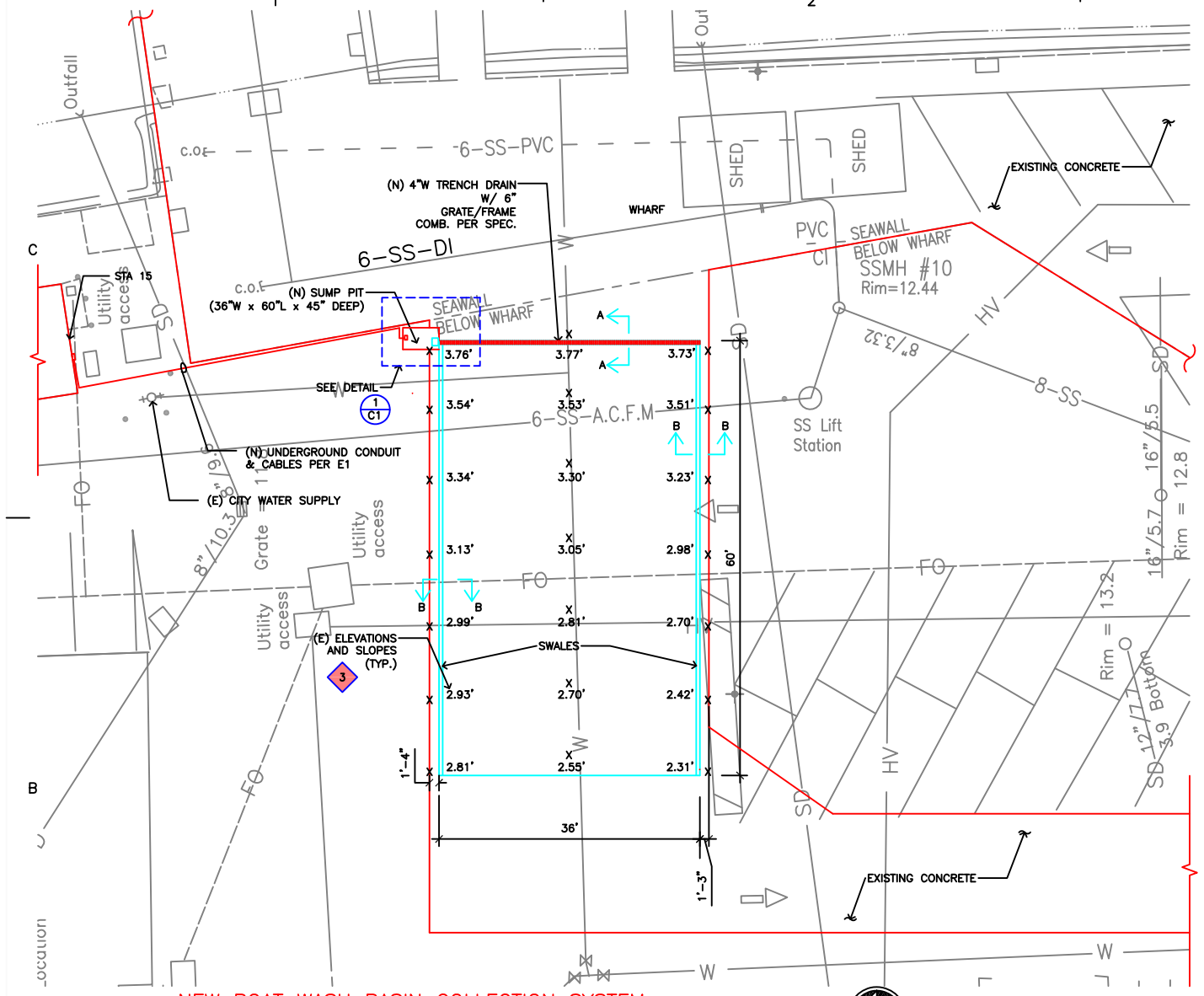
By: _____
Nicole C. Sasaki
Attorneys for Plaintiff

IT IS SO ORDERED.

Date: _____

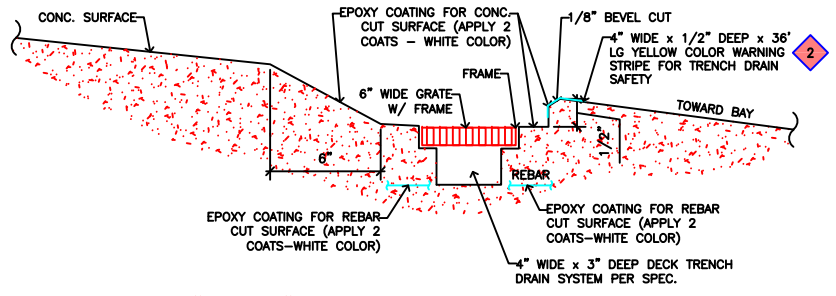
_____
EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE

APPENDIX A



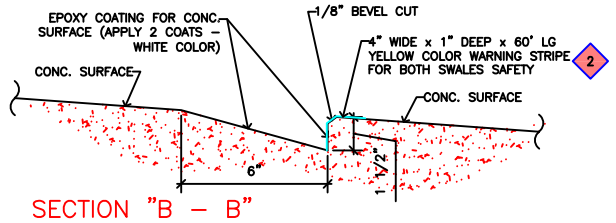
NEW BOAT WASH BASIN COLLECTION SYSTEM

SCALE: 1" = 10'-0"



SECTION "A – A"

SCALE: NTS



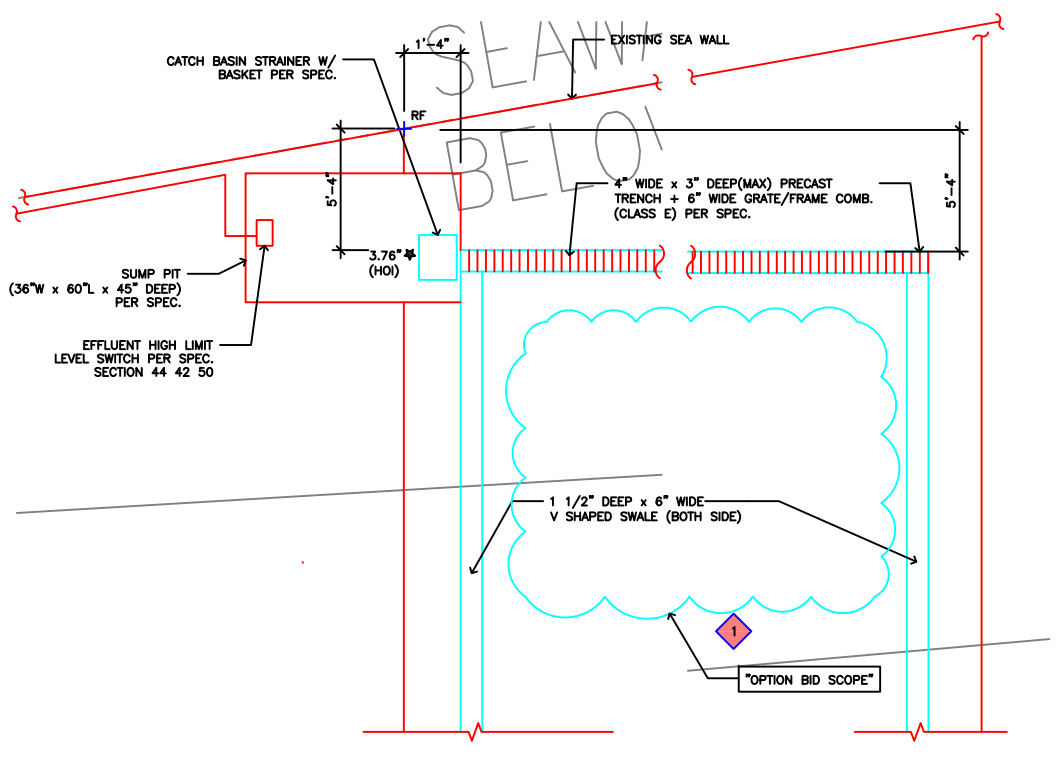
SECTION "B – B"

SCALE: NTS

GENERAL NOTES:

A. THESE DRAWINGS SHALL BE USED IN CONJUNCTION WITH THE PROJECT SPECIFICATIONS.

B. INFORMATION SHOWN ARE BASED ON RECORD DRAWINGS, WHICH ARE KNOWN TO BE INACCURATE. FIELD VERIFY EXISTING CONDITION PRIOR TO START OF WORK.



BOAT WASH BASIN COLLECTION SYSTEM

1 / C1

SCALE: 1/2" = 1'-0"

KEY NOTES:

1. OPTION BID SCOPE: PROVIDE ALL LABOR, MATERIALS, EQUIPMENT, FIELD SURVEY, TESTING SERVICE, TRANSPORTATION, AND SUPERVISION NECESSARY TO REPAIR AND RESTORE ANY DAMAGED SURFACE CONCRETE CONTAINMENT AREA TO SMOOTH SURFACE INCLUDING THE PREVIOUS UNDERGROUND INSTALLATION SURFACE CUTS, SMALL PITTED HOLES, AND CRACKS. AFTER REPAIRS, APPLY TWO (2) COATS OF WHITE COLOR EPOXY COATING MATERIAL TO THE WHOLE CONCRETE CONTAINMENT AREA APPROXIMATELY 36 FT WIDE X 60 FT LONG DIMENSION SIZE.

2. PROVIDE 2–INCH WIDE BLACK WARNING STRIPE WITH 2–INCH WIDE YELLOW STRIPE IN 45 DEG. ANGLE STENCIL PER THE SPECIFIED DIMENSIONS HEREIN.

3. FIELD VERIFY EXISTING ELEVATIONS AND SLOPES (TYP.)

CONSULTANTS

U.S. COAST GUARD

CIVIL ENGINEERING UNIT OAKLAND

USCG, CEU OAKLAND
1301 CLAY RD., SUITE 700N
OAKLAND, CA 94612

ISSUE

MARK	DATE	DESCRIPTION

A/E PROJECT NO:
CAD FILE NAME:
DESIGNED BY: S. LEE
DRAWN BY: JW
EDITED BY:
CHECKED BY:

SCALE: AS SHOWN PLOT SCALE: 1 = 1

SHEET TITLE

INSTALL BOAT BASIN COLLECTION SYSTEM IN YBI
SECTOR SAN FRANCISCO
SAN FRANCISCO CA

CIVIL
PLAN AND DETAILS

PREPARED BY:	REVIEWED BY:	REVIEWED BY:
PROJECT MGR		DIVISION CHIEF

APPROVED BY:
TECHNICAL DIRECTOR DATE

PROJECT NUMBER	DRAWING NUMBER
10321799	10321799

DISCIPLINE/SHT NO
C1

SHEET 2 OF 3

P:\1.Project_Files\District_11_AOR\10321799_SectorSF_InstallBoatWashBasinCollectionSystem\2.DESIGN_PHASE\3. AutoCAD Drawings\10321799C1.dwg 8-22-19 11:09:58 AM DJEnglish

APPENDIX B-1

Legend

- Sanitary Sewer Drain
- Plugged Drain
- Aboveground Storage Tank (AST)
- Catch Basin (CB)
- Caltrans Storm Drain Outfall
- USCG Storm Drain Outfall (OF)
- Surface Flow Sampling from this general area
- Emergency Generator AST
- 90-Day Hazardous Waste Storage Area
- Spill Response Kit
- Caltrans Storm Drain USCG
- Storm Drain
- Open Trench
- Stormwater Flow Direction
- Industrial Area, Interior Lines
- Administrative Area
- Former Industrial Area
- 2019-2020 Sample Locations

NAD 1983 State Plane California III
Projection: Lambert Conformal Conic
Linear Unit: US Foot

N

0 150 300
Feet
1 inch = 146 feet

Building 1: Eng. Office/Shops
Building 2: Shops and Training
Building 3: Shops and Station SF Berthing
Building 4: Carpenter Shop
Building 5: Power Bldg./Compressor
Building 6: Storage (Carpenter)
Building 10: Buoy Shed (Attached)
Building 11: Buoy Sandblast/Spray Booth
Building 15: Sub Station #2
Building 16: Patrol Boat Storage
Building 17: Satellite Waste Accumulation
Building 18: Station SF Admin/Maintenance

AECOM

Site Diagram
US Coast Guard
Sector San Francisco
California

Prepared By: JRP	Checked By: CvK
Job: 60596606	Date: 2/10/2020

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APPENDIX B-2

Legend

- Plugged Drain
- Aboveground Storage Tank (AST)
- Catch Basin (CB)
- USCG Storm Drain Outfall (OF)
- Surface Flow Sampling from this general area
- Spill Response Kit
- USCG Storm Drain
- Open Trench
- Stormwater Flow Direction
- Industrial Area, Interior Lines
- Administrative Area
- Boat Wash Facility
- Industrial Area
- Sample Locations

Building 15: Sub Station #2
Building 16: Patrol Boat Storage
Building 17: Satellite Waste Accumulation
Building 18: Station SF Admin/Maintenance

NAD 1983 State Plane California III
Projection: Lambert Conformal Conic
Linear Unit: US Foot

N

0 25 50
Feet
1 inch = 25 feet

AECOM

Site Diagram Detail,
US Coast Guard
Sector San Francisco
California

Prepared By: JRP	Checked By: CvK
Job: 60596606	Date: 8/14/2020

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APPENDIX C

INDUSTRIAL ACTIVITIES STORMWATER POLLUTION PREVENTION PLAN

for

US Coast Guard
Sector San Francisco

Facility Address:

1 Yerba Buena Island
San Francisco, CA 94130

Waste Discharge Identification (WDID):

2 38I012064

SIC Code

Co-Located: 3732

Exceedance Response Action (ERA) Status:

Level 2 for Aluminum, Copper, Iron, Zinc and TSS

Legally Responsible Person (LRP):

US Coast Guard
1 Yerba Buena Island
San Francisco, CA 94130
CAPT Marie Byrd
(415) 399-3410

Duly Authorized Representative:

Hamza, Abdullatef
(415) 399-7375

SWPPP Prepared by:

AECOM
300 Lakeside Drive
Oakland, CA 94612

SWPPP Preparation Date

August 2020

Tables

Appendices

ANT	Aids to Navigation Team
ASBS	Area of Special Biological Significance
BMP	Best Management Practice
CASQA	California Association of Stormwater Quality
CoC	Chain of Custody
ERA	Exceedance Response Actions
IGP	Industrial General Permit
LRP	Legally Responsible Person
MDL	Method Detection Limit
mg/L	Milligrams per liter
MIP	Monitoring Implementation Plan
MS4	Municipal Separate Storm Sewer System
NAL	Numeric Action Level
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NOT	Notice of Termination
NPDES	National Pollutant Discharge Elimination System
NSWD	Non-Stormwater Discharge
O&G	Oil and Grease
OWS	Oil-Water Separator
PRD	Permit Registration Document
QCS	Qualified Combined Samples
QISP	Qualified Industrial Stormwater Practitioner
QSE	Qualified Storm Event
RWQCB	Regional Water Quality Control Board
RSR	Representative Sample Reduction
SMARTS	Stormwater Multi Application and Report Tracking System
SPCC	Spill Prevention Control and Countermeasures
SWRCB	State Water Resources Control Board
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
TSS	Total Suspended Solids

U.S. EPA	United States Environmental Protection Agency
UST	Underground Storage Tank
VOC	Volatile Organic Compound
WDID	Waste Discharge Identification

LEGALLY RESPONSIBLE PERSON

Approval and Certification of the Stormwater Pollution Prevention Plan

Facility Name:	United States Coast Guard, Sector San Francisco
Waste Discharge Identification (WDID):	2 38I012064

"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 gather and evaluate 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, to the best of my knowledge and belief, the information submitted is, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Legally Responsible Person

SWPPP AMENDMENT LOG

Facility Name: United States Coast Guard

Waste Discharge Identification (WDID): 2 38I012064

Amendment No.	Date	Page and Section No.	Requested By	Brief Description of Amendment; include reason for change, site location, and BMP modifications (previous and proposed).	Prepared and Approved By
Original	June 2013	Entire Document	N/A	Original SWPPP Preparation	TetraTech
1	1/31/19	Entire Document	USCG	Update document for compliance with 2014 Industrial General Permit and NAL Exceedance Level Status.	Casper van Keppel (AECOM Technical Services, Inc.)
2	May 2020	Entire Document	USCG	Updated document for changed industrial activities, and related changes in drainage areas, BMPs, and sampling locations.	Casper van Keppel (AECOM Technical Services, Inc.)

SECTION 1 SWPPP REQUIREMENTS

1.1 INTRODUCTION

United States Coast Guard, Sector San Francisco (Sector SF, Sector) is a facility located on Yerba Buena Island, San Francisco. The Sector includes industrial and administrative portions. Typical activities include maintenance of small boats and navigation aids (i.e., buoys). The property is owned by the US Federal Government. The facility location is shown on the Site Map(s) in Appendix A.

This Stormwater Pollution Prevention Plan (SWPPP) is designed to comply with California's *General Permit for Stormwater Discharges Associated with Industrial Activities* (Industrial General Permit or IGP) Order No. 2014-0057-DWQ (NPDES No. CAS000001) issued by the State Water Resources Control Board (SWRCB). This SWPPP has been adapted from the SWPPP Template provided on the California Stormwater Quality Association (CASQA) Stormwater Best Management Practice Handbook Portal: Industrial and Commercial (CASQA 2014). In accordance with the IGP, Section X.A, this SWPPP contains the following required elements:

- Facility Name and Contact Information;
- Site Map;
- List of Significant Industrial Materials;
- Description of Potential Pollution Sources;
- Assessment of Potential Pollutant Sources;
- Minimum Best Management Practices (BMPs);
- Advanced BMPs, if applicable;
- Monitoring Implementation Plan (MIP);
- Annual Comprehensive Facility Compliance Evaluation (Annual Evaluation); and
- Date that SWPPP was Initially Prepared and the Date of Each SWPPP Amendment, if Applicable.

1.2 PERMIT REGISTRATION DOCUMENTS

Required Permit Registration Documents (PRDs) must be submitted to SWRCB via the Stormwater Multi-Application and Report Tracking System (SMARTS) by the Legally Responsible Person (LRP). The project-specific PRDs include:

1. Notice of Intent (NOI);
2. Signed Certification Statement (LRP certification is provided electronically with SMARTS PRD submittal);
3. Site Map(s);
4. SWPPP; and
5. Annual Fee.

Also note the following:

- The Site Map(s) are presented in Appendix A;
- A copy of the submitted PRDs is located in Appendix B along with the WDID confirmation from SWRCB;
- This SWPPP should not include a copy of the IGP when uploaded into SMARTS; and
- In the event of future significant changes to the facility layout, the Discharger (i.e., US Coast Guard) must certify and submit new PRDs via SMARTS.

1.3 SWPPP AVAILABILITY AND IMPLEMENTATION

This SWPPP must be available on-site to all employees during all hours of operation (see Section 2.5 for the Operations Schedule), and made available when requested by a State or Municipal inspector. This SWPPP must be implemented within 30 days of the revision, i.e., [insert date], 2020.

1.4 POLLUTION PREVENTION TEAM

Personnel that have been designated as Pollution Prevention Team members are listed in Appendix D. Table 1.1 provides Pollution Prevention Team member job titles along with their responsibilities and duties. A list of alternate team members who will perform SWPPP activities when regular members of the Pollution Prevention Team are absent or unavailable is also provided in Appendix D. This table should be updated as needed when there are changes to staff and/or staff responsibilities. All team members should be trained to perform the duties assigned to them. Employee training logs are provided in Appendix C.

The facility covered by this SWPPP is currently in Level 2 status for Aluminum, Copper, Iron, Zinc and TSS for the 2019-2020 stormwater year and a Qualified Industrial Stormwater Practitioner (QISP) has

been assigned as identified in Appendix D. The QISP has primary responsibility for providing training to the appropriate team members assigned to perform the activities required in this SWPPP.

Table 1.1
Pollution Prevention Team

Title	Responsibilities and Duties
Qualified Industrial Stormwater Practitioner	• Complete Level 1 and 2 ERA Evaluations • Prepare Level 1 and 2 ERA Reports and Action Plan • Amend SWPPP, as needed • Provide training for pollution prevention team members
Facility Manager, Site Supervisor	• Implementing, maintaining, and amending the plan at intervals required in the plan. • Identifying and employing all appropriate baseline and specific BMPs • Conducting periodic inspections • Completing corrective or follow-up actions in a timely manner • Promptly reporting and cleaning up all discharges • Ensuring that employees are trained annually on Pollution Prevention • Implementing any action items identified during inspection or at any time a non-compliance incident occurs
Operation Technicians	• Providing 24-hour site operations
Field EH&S Specialist	• Keeping the facility apprised of regulatory changes that require revisions of the Plan • Helping implement new requirements • Assisting in discharge reporting • Obtaining approvals for disposal of spill clean-up materials • Assisting in developing training materials

1.5 DULY AUTHORIZED REPRESENTATIVES

Duly Authorized Representatives who are responsible for SWPPP implementation and have authority to sign documents for the permit other than the PRDs are listed in Appendix D. Written authorizations from the LRP for these individuals are also provided in Appendix D.

1.6 PERMITS AND GOVERNING DOCUMENTS

In addition to the IGP, the following documents have been taken into account while preparing this SWPPP:

- Regional Water Quality Control Board (RWQCB) requirements;
- Local Basin Plan requirements;
- Total Maximum Daily Load (TMDL) Requirements;
- Spill Prevention Control and Countermeasures (SPCC) Plan;
- Hazardous Material Business Plan; and
- Local codes and ordinances.

1.7 SWPPP AMENDMENTS

This SWPPP should be amended or revised as needed. A list of amendments (Amendment Log) is included in the front of this SWPPP, and amendment certifications are included in Appendix E. The Amendment Log must include the date of initial preparation and the date of each amendment. Instances where the SWPPP should be revised include:

- There is an IGP violation;
- There is a reduction or increase in the total industrial area exposed to stormwater;
- BMPs do not meet the objectives of reducing or eliminating pollutants in stormwater discharges;
- There is a change in industrial operations which may affect the discharge of pollutants to surface waters, groundwater(s), or a municipal separate storm sewer system (MS4);
- There is a change to the parties responsible for implementing the SWPPP; or
- Otherwise deemed necessary by the Qualified Industrial Stormwater Practitioner (QISP).

The following items will be included, as necessary, in each amendment:

- Who requested the amendment;
- The location of proposed change;
- The reason for change;
- The original BMP(s) proposed, if any; and
- The new BMP(s) proposed.

The SWPPP text must be revised replaced, and/or hand annotated as necessary to properly convey the amendment. SWPPP amendments must be certified and submitted by the LRP or their designated Duly Authorized Representative via SMARTS within 30 days whenever the SWPPP contains significant revisions (e.g. LRP or Duly Authorized Representative changes, new BMP implementation, Level 1 or

2 escalation, significant outside operation changes, etc.). Otherwise, SWPPP changes are to be certified and uploaded to SMARTS once every three (3) months in the reporting year (i.e. when minor modifications have been made to the SWPPP to represent corrections, process description clarifications, etc.).

1.8 RETENTION OF RECORDS

Paper or electronic records of documents required by this SWPPP will be retained for a minimum of five (5) years from the date generated or date submitted, whichever is later, for the following items:

- Employee Training Records;
- BMP Implementation Records;
- Spill and Clean-up Related Records;
- Records of Sampling and Analysis Information
    - The date, exact location, and time of sampling or measurement;
    - The date(s) analyses were performed;
    - The individual(s) that performed the analyses;
    - The analytical techniques or methods used; and
    - The results of such analyses;
- Records of Visual Observations
    - The date;
    - The industrial areas/drainage areas of the facility observed during the inspection (Location);
    - The approximate time of the observation;
    - Presence and probable source of observed pollutants; and
    - Name of the individual(s) that conducted the observations;
- Response to the observations including identification of SWPPP revisions if needed;
- Level 1 Exceedance Response Actions (ERA) Reports;
- Level 2 ERA Action Plan;
- Level 2 ERA Technical Report; and
- Annual Reports from SMARTS (checklist and any explanations).

Copies of these records will be available for review by RWQCB's staff at the facility during scheduled facility operating hours. Upon written request by U.S. EPA or the local MS4 owner, Dischargers must provide paper or electronic copies of requested records to the State or Regional Water Boards, U.S. EPA, or local MS4 owner within ten (10) working days from receipt of the request. For the Yerba Buena Island location, a local MS4 system is not in place.

1.9 EXCEEDANCE RESPONSE ACTIONS (ERAS)

If an IGP Numeric Action Level (NAL) exceedance for a contaminant or parameter occurs in a given reporting year, a Level 1 ERA Evaluation and a Level 1 ERA Report will be required in the following year, or, if in a subsequent year, a Level 2 ERA Action Plan and a Level 2 ERA Report will be required in accordance with the IGP. The results of either of the ERA reports may require that the SWPPP be amended.

1.10 ANNUAL COMPREHENSIVE FACILITY COMPLIANCE EVALUATION

The IGP (Section XV) requires the Discharger to conduct one Annual Comprehensive Facility Compliance Evaluation (Annual Evaluation) for each reporting year (July 1 to June 30). Annual Evaluations should be conducted at least eight (8) months and not more than sixteen (16) months after the previous Annual Evaluation. The planned window for conducting the Annual Evaluation is between April and June of each year. The SWPPP will be revised, as appropriate based on the results of the Annual Evaluation, and the revisions will be implemented within 90 days of the Annual Evaluation.

At a minimum, Annual Evaluations will consist of:

- A review of all sampling, visual observation, and inspection and monitoring records and sampling and analysis results conducted during the previous reporting year;
- A visual inspection of all areas of industrial activity and associated potential pollutant sources for evidence of, or the potential for, pollutants entering the stormwater conveyance system;
- A visual inspection of all drainage areas previously identified as having no exposure to industrial activities and materials in accordance with the definitions in Section XVII;
- A visual inspection of equipment needed to implement the BMPs;
- A visual inspection of any BMPs;
- A review and effectiveness assessment of all BMPs for each area of industrial activity and associated potential pollutant sources to determine if the BMPs are properly designed, implemented, and are effective in reducing and preventing pollutants in industrial stormwater discharges and authorized NSWDs; and
- An assessment of any other factors needed to comply with the Annual Reporting requirements in IGP Section XVI.B.

1.11 ANNUAL REPORT

The Annual Report will be prepared, certified, and must be electronically submitted no later than July 15th following each reporting year using the standardized format and checklists in SMARTS based on the reporting requirements identified in Section XVI of the IGP. Annual reports will be submitted in SMARTS and in accordance with information required by the on-line forms.

1.12 TERMINATION AND CHANGES TO GENERAL PERMIT COVERAGE

When any of the following conditions occur, termination of coverage under the IGP will be requested by certifying and submitting a Notice of Termination (NOT) via SMARTS:

- Operation of the facility has been transferred to another entity;
- The facility has ceased operations, completed closure activities, and removed all industrial related pollutant generating sources; and
- The facility's operations have changed and are no longer subject to the IGP.

The SWPPP and all of the provisions of the IGP will be complied with until a valid NOT is received and accepted by the Board.

If ownership changes, the new owner of the facility will be notified of the IGP and regulatory requirements for permit coverage.

SECTION 2 FACILITY INFORMATION

2.1 FACILITY DESCRIPTION

2.1.1 Facility Location

The Sector San Francisco facility is located at 1 Yerba Buena Island, San Francisco, California. The facility is located on the east side of the island, south-adjacent to the Bay Bridge. The site borders the San Francisco Bay. The facility is located at 37.8087693 North,122.3613761 West and is identified on the Site Map(s) in Appendix A.

The site discharges to the San Francisco Bay, which is listed for water quality impairments on the most recent 303(d)-list for the following impairments:

- Chlordane;
- DDT (Dichlorodiphenyltrichloroethane);
- Dieldrin;
- Dioxin compounds (including 2,3,7,8-TCDD);
- Furan Compounds;
- Invasive Species;
- Mercury;
- PCBs (Polychlorinated biphenyls);
- PCBs (Polychlorinated biphenyls) (dioxin-like); and
- Selenium.

The Monitoring Implementation Plan (MIP) does not include analysis of these pollutants because they are not associated with the industrial activities occurring at the facility. If exposure of industrial activity associated with any of the above pollutants occurs in the future, the monitoring plan should be revised accordingly.

2.1.2 Facility Operations

Industrial activities as described by Attachment C of the IGP have largely been terminated in the 3.5 acres in the southern portion of the facility by ceasing the industrial activity or eliminating the potential for exposure to stormwater from stored equipment or material. Remaining US Coast Guard operations at the Sector SF facility include the following activities under the SIC code of 3732:

- Staging of buoys for transport to offsite facility;
- Small boat washing;
- Bilge water receiving, storage and disposal (exposed tank with secondary containment);
- Waste Management (non-exposed waste storage area);
- Aboveground Bulk (≥55 gal) Chemical Storage Areas (non-exposed);
- Diesel Aboveground Storage Tank (exposed double-wall tank with secondary containment);
- Facility Roads/Grounds (Paved), Parking Areas; and
- Maintenance Shops (Buildings 1 through 9, non-exposed).

The southeast corner of Yerba Buena Island was used as a lighthouse facility beginning in 1872. In 1939, the Lighthouse Service became part of the U.S. Coast Guard. In 1966 and 1974, the Navy transferred additional acreage to the Coast Guard. Most of the buildings are of World War I and II vintage (TetraTech, 2013). The City and County of San Francisco Public Utilities Commission provides potable water and wastewater treatment. A municipal contractor removes solid waste and the Defense Logistics Agency removes hazardous waste from Sector SF for disposal.

The support side of Sector SF supports the buoy tenders and search and rescue operations vessels berthed at the facility. That portion of Sector SF contains the industrial wharf, a boat haul-out facility, and buildings housing various support functions. Many historic industrial activities in support of the Aids to Navigation Team (ANT) have been ceased at the facility, including the refurbishment and maintenance of navigational buoys. Remaining exterior activities at the facility include limited maintenance of Coast Guard vessels, off-loading of bilge water for off-site disposal, and ship refueling. Hazardous materials in use at the facility are associated with these remaining activities, along with buildings and grounds maintenance, and limited ANT support.

The boat haul-out facility consists of two piers and a traveling lift. The shore support facilities include the buoy yard, where buoys and related hardware (e.g., anchor chains and blocks) are stored; a boat rinse area with a high-pressure wash station and rinse water collection sump, and an oily bilge water aboveground storage tank (AST) in a secondary containment structure; a Resource Conservation and Recovery Act (RCRA)-permitted 90-day hazardous waste storage area (north of Building 3); hazardous and flammable materials storage lockers; and Buildings 1 through 18. Vehicles and equipment are stored at various locations on the pavement throughout the area.

The wharf that fronts the industrial area is approximately 60 feet wide from the seawall to the bayward rim. It extends from the south end of the industrial area to the dock at the end of MaCalla Road. It is

paved, nearly level, and does not contain any stormwater catch basins. The wharf is used for temporary staging of large buoys awaiting shipping to off-site locations or placement in waterways.

The wharf is also used for mooring large vessels and is equipped with utility connections, including potable water, sanitary sewage, electricity, and compressed air. Mooring without performing maintenance is considered a transportation activity and not subject to the IGP.

Buildings 1 through 9 are used for administration, welding, carpentry, equipment storage, and ANT storage. Building 10 is used for buoy and steel storage. Small quantities of hazardous materials are stored throughout these buildings.

Sandblasting and painting activities previously conducted in blasting and painting booths inside Buildings 11 have been terminated in Summer 2019. Buoy maintenance is no longer conducted at the facility. As a result, the Permit to Operate, issued by the Bay Area Air Quality Management District, has been rescinded.

Flammable and other hazardous materials are stored in storage lockers at the toe of the hill adjacent to the parking lot between buildings 3 and 18. Buildings 16 and 17, on the quayside north of the finger pier, are used for paint storage and satellite waste (paint) accumulation.

2.1.3 Existing Conditions

A location map of the Sector's vicinity and a site drainage map are presented in Appendix A. As a result of recent efforts to minimize activities or equipment and material storage described above, there is very limited exposure of activities to precipitation and stormwater run-off. Existing, modified, and new BMPs are described in Section 3.

Historic or legacy sources of contamination at the site may include aerially deposited metals from the former Bay Bridge, which was located over part of Sector SF. Metal deposition on the Sector SF Facility may have occurred during demolition of that bridge, as well as during almost a century of vehicle traffic passing overhead.

2.1.4 Description of Drainage Areas and Existing Drainage

The industrial portion of the facility is divided into the following five drainage areas:

1. Southern Area – Sheetflow to wharf edge;
2. Boat Lift and Wash Area. – Sheetflow to wharf edge and Boat Wash Sump;
3. Maintenance and Bilge Transfer Area – Single catch Basin to OF-4;
4. Parking, Covered Storage, and Mooring (Non-Industrial / Non-Exposed Area)– Sheetflow to wharf edge; and
5. Administrative Area (Non-Industrial)– Subsurface collection system to OF-5 and OF-6, and catch drain to OF-2 through CB-04.

The drainage areas are shown on the Site Map in Appendix A. The Site Map shows the area layout, including the general drainage direction, storm drain system, drain inlets, its respective drainage areas, and discharge locations.

The California Department of Transportation (CalTrans) operates a storm drain pipe that conveys precipitation from the overhead section of the Bay Bridge to an outfall north-adjacent to OF-5. The location of that pipe is also indicated on Figure 2. However, CalTrans' drainage piping crosses the US Coast Guard facility under an easement and is separate from US Coast Guard's collection systems.

Additionally, the Site Map includes the following, (where applicable):

- Structural control measures to prevent or control discharges and to reduce pollutants in stormwater runoff;
- Locations where significant amounts of materials are stored or exposed to precipitation;
- Location(s) where major discharges have occurred;
- Locations where non-stormwater significant discharges could occur;
- Activities exposed to precipitation or which could result in discharges, such as fueling stations, vehicle and equipment maintenance and/or cleaning areas, loading/unloading areas, waste treatment or disposal areas, liquid storage containers, and/or processing and storage areas; and
- The probable flow direction for a release of a significant amount of pollutants from discharges or on-site industrial activity.

For the most part, the facility site gently slopes towards the East. Limited areas slope north or south towards more recently constructed drain inlets. Surface drainage at the site is conveyed to the San Francisco Bay via sheet flow and a number of inlets.

As the terrain west of the facility slopes steeply upward, run-off from properties higher on the island drains along the rock face and through drain pipes towards Sector SF. A catch drain and underground piping are intended to prevent that drainage from running onto the facility.

2.1.5 Stormwater Run-On from Offsite Areas

The lands adjacent to the Coast Guard facility are owned by Caltrans, for the San Francisco-Oakland Bay Bridge right-of-ways and ramps, and the U.S. Navy, as part of the former Naval Station Treasure Island managed by the City and County of San Francisco's Treasure Island Development Authority. These properties include use and maintenance of the Bay Bridge, residential housing, and nonindustrial facilities upslope from the industrial and administrative areas. Land north of Sector SF boundary is used by Caltrans for the new eastern span of the Bay Bridge, and Navy property northeast of the Sector SF boundary is not currently used.

As the terrain west of the facility slopes steeply upward, run-off from residential properties higher on the island drains along the rock face and through drain pipes towards Sector SF. A catch drain that discharges through CB-04 and underground piping to OF-2 is intended to prevent that drainage from running onto the facility.

2.2 OPERATIONS SCHEDULE

The industrial activities at the Sector SF are performed Monday through Friday, 6 AM through 2 PM. Industrial activities that may occur during this time period are listed in Section 2.1.2. Variations in actual operating hours may occur as necessary.

This SWPPP will be implemented, and a copy made available to all facility staff at all times. A copy will be available to regulatory agency personnel upon request.

If industrial activities are temporarily suspended for ten (10) or more consecutive calendar days during a reporting year, BMPs that are necessary to achieve compliance with this IGP during the temporary suspension of the industrial activity will be identified and incorporated into the SWPPP.

2.3 POLLUTANT SOURCE ASSESSMENT

This section presents a list of the industrial materials that have the potential to become pollutant sources at the Sector SF facility due to stormwater exposure. A summary of significant spills and leaks that have occurred onsite is also provided.

2.3.1 Description of Potential Pollutant Sources

Normal US Coast Guard activities are summarized in Table 2.1. That table includes a list of on-site industrial activities and associated materials exposed to stormwater that have the potential to contribute pollutants to stormwater runoff. These activities and associated pollutants are the basis for selecting the BMPs for the facility as described in Section 3. Locations of all material stockpiles, storage areas, anticipated pollutants, and associated BMPs are shown on the Site Map(s) in Appendix A.

Table 2.1
Industrial Activities and Associated Materials with Potential to Pollute Stormwater

Industrial Activity	Associated Materials	Material Quantity	Material Physical Characteristics	Material Location	Associated Pollutants	Stormwater Exposure Pathway
Small Boat Washing	Metal or fiberglass boats, wash water, surfactants	Flow-though system, used daily.	Solids/Liquids	Adjacent to boat lift. Wash water is collected in a sump and pumped to sanitary sewer	Metals, Oil & Grease, Synthetic Pollutants	Overtopping of sump, overspray during washing.
Bilge Water Receiving and Disposal	Oily Water and Sludge	1,500 gallon tank. Shipped every other month..	Solids/Liquids	At water edge near maintenance shops. Tank in secondary containment.	Oil & Grease, Diesel Fuel Hydrocarbons, TSS, Metals	Spills during transfer operations.
Trash and Recyclables	Facility Trash (Non-Hazardous), Paper/Plastic Recyclables, Metals Recycling	Three 6-yd bins (emptied weekly), One 20-yd Roll-Off Container (exchanged 2x per week)	Solids/Liquids	Trash in fenced enclosure at NW corner of industrial area	Gross Pollutants Metals, Oil & Grease, Total Organic Carbon (TOC)	No exposure. Procedures are in place to keep receptacles closed..

Table 2.1
Industrial Activities and Associated Materials with Potential to Pollute Stormwater

Industrial Activity	Associated Materials	Material Quantity	Material Physical Characteristics	Material Location	Associated Pollutants	Stormwater Exposure Pathway
Hazardous waste storage	Hazardous Waste (Oil, Oil Filters, Aerosols, Solvents, etc.)	Up to twelve 55-gallon drums. Drums (shipped every 90 days)	Solids/Liquids	South of Maintenance Shop. hazardous waste in fenced, covered area with secondary containment.	Gross Pollutants Metals, Oil & Grease, Synthetic Pollutants, Total Organic Carbon (TOC)	No exposure: Waste covered/under roof/secondary containment. Procedures are in place to keep receptacles under roof / contained.
Hazardous waste storage	Waste oil, waste diesel, oily water	Two 300-gallon IBCs	Liquid	South of covered hazardous waste storage	Oil & Grease	Spills during waste transfer to IBC. Spill pallets mitigate container leakage.
Aboveground Bulk (≥55 gal) Chemical Storage Areas	New Chemical Drums, Waste Containers, Product Tanks, CT Chemicals Tanks/Totes (Bleach, Sulfuric Acid, Inhibitor/Dispersant, Biocide)	Up to ten 55-gal Drums,	Solids/Liquids	Various Locations of use (Outside/Inside)	Oil & Grease, Organic and Inorganic Chemicals, pH	No Exposure. Activity/material has secondary containment and/or is stored in storm-resistant buildings
Boat Diesel Above-Ground Storage Tank	Diesel Fuel	10,000-gallon tank and 6,000-gallon tank.. Deliveries in 5,000-gal loads	Liquid	Aboveground, west of maintenance building	Diesel Fuel	Double-walled tanks. Due to accidental spills during vehicle fueling and fuel deliveries

Table 2.1
Industrial Activities and Associated Materials with Potential to Pollute Stormwater

Industrial Activity	Associated Materials	Material Quantity	Material Physical Characteristics	Material Location	Associated Pollutants	Stormwater Exposure Pathway
Gasoline Storage	Gasoline	500-gallon tank	Liquid	Aboveground, north of hazardous waste storage	Gasoline	Double-walled tank. Due to accidental spills during vehicle fueling and fuel
Facility Roads/Grounds (Paved/Unpaved), Parking Areas	Trash, Debris, Vehicle Fuel/Oil Leaks, Car Tire Debris	De Minimis	Solids/Liquids	Sitewide	Oil & Grease, Total Suspended Solids (TSS)	Terrain is exposed to stormwater
Equipment Maintenance and Repair, Carpentry	Various quantities depending upon maintenance schedules	. <10 yd3 storage, <10 yd delivery per month.	Solids/Liquids	Maintenance shops.	Oil & Grease, Metals, Synthetic Organics, TSS	No Exposure. These activities take place indoors.
Boat Storage Lockers	Various products used on boats in limited quantity containers. (<55 gal each).	9 Lockers. Max rated storage per locker 275 gallons..	Solids/Liquids	North of hazardous waste storage	Oil & Grease, Metals, Synthetic Organics	None, as these lockers are self-contained metal boxes. No open containers are moved in/out of the lockers.

Table 2.1
Industrial Activities and Associated Materials with Potential to Pollute Stormwater

Industrial Activity	Associated Materials	Material Quantity	Material Physical Characteristics	Material Location	Associated Pollutants	Stormwater Exposure Pathway
Maintenance Shop	Oil, Lubricating Oils, Paint, Solvents, Grease, Joint Compound, Concrete Cleaners	<220 gal storage in 1-gal to 55-gal containers. Throughput <100 gal/month	Liquids	Maintenance Shop, Buildings 1 through 9.	Oil & Grease, Metals, Synthetic Organics	No Exposure. Occurs within an enclosed storm-resistant building

2.3.2 Significant Spills and Leaks

There have been no significant spills or leaks that have occurred at the Sector SF facility onsite within the previous five-year (i.e., 60-month) period. Any future spill or leak that occurs on-site will be recorded in Table 2.2 below.

Table 2.2
Spills and Leaks within Previous Five-Year Period

Industrial Material	Material Physical Characteristics	Location of Spill or Leak	Quantity Spilled or Leaked	Quantity Discharged from Site	Remaining Quantity with Potential for Discharge
None					

2.4 IDENTIFICATION OF NON-STORMWATER DISCHARGES (NSWDS)

Non-stormwater discharges (NSWDs) consist of discharges which do not originate from precipitation events. The IGP provides allowances for specified NSWDs provided they:

- Do not cause erosion;
- Do not carry other pollutants;
- Are not prohibited by the local MS4; and
- Do not require a separate National Pollutant Discharge Elimination System (NPDES) Permit from the RWQCB.

NSWDs into storm drainage systems or waterways, which are not authorized under the IGP and listed in the SWPPP, or authorized under a separate NPDES permit, are prohibited.

Non-stormwater discharges that are authorized at this facility include the following:

- Discharges from firefighting activities;
- Flushing of fire hydrants and emergency eye wash stations;
- Potable (non-recycled) water sources, including water line flushing;
- Atmospheric condensates including refrigeration, air conditioning, and cryogenic heat exchangers;
- Springs;
- Uncontaminated groundwater; and
- Foundation or footing drains where flows are not contaminated with process materials.

These authorized NSWDs will be managed with the stormwater and non-stormwater BMPs described in Section 3 of this SWPPP. These BMPs are implemented to:

- Reduce or prevent the contact of authorized NSWDs with materials or equipment that are potential sources of pollutants;
- Reduce, to the extent practicable, the flow or volume of authorized NSWDs;
- Ensure that authorized NSWDs do not contain quantities of pollutants that cause or contribute to an exceedance of a water quality standards; and
- Reduce or prevent discharges of pollutants in authorized NSWDs in a manner that reflects best industry practice considering technological availability and economic practicability and achievability.

Monthly visual observations will be conducted according to the IGP (Section XI.A.1) for NSWDs and sources to ensure adequate BMP implementation and effectiveness. Monthly visual observations include observations for evidence of unauthorized NSWDs.

Activities at this site that may result in unauthorized non-stormwater discharges include:

- Hazardous materials or fuel spills;
- Boat washing; and
- Bilge water transfers.

Steps will be taken, including the implementation of appropriate BMPs as defined in Section 3, to ensure that unauthorized NSWDS are prevented, eliminated, controlled, disposed off-site, or treated on-site.

The following discharges are authorized by a regional NPDES permits:

- Fire hydrant testing

2.5 REQUIRED SITE MAP(S) INFORMATION

The facility's Site Map(s) is (are) provided in Appendix A, and include(s) all information required by the IGP. The maps include information regarding the facility boundary and stormwater drainage areas, nearby water bodies, locations of stormwater collection and conveyance systems including outfalls, locations and descriptions of all industrial activities and materials, and locations and descriptions of all structural control measures.

A summary of the information provided in the Site Map(s) is provided in Table 2.3 below.

Table 2.3
Required Site Map(s) Information Checklist

Included on Site Map(s)? Yes/No/NA	Required Element
Yes	The facility boundary
Yes	Stormwater drainage areas within the facility boundary
NA	Portions of any drainage area impacted by discharges from surrounding areas
Yes	Flow direction of each drainage area
NA	On-facility surface water bodies
NA	Areas of soil erosion
Yes	Location(s) of nearby water bodies (such as rivers, lakes, wetlands, etc.)
Yes	Location(s) of municipal storm drain inlets that may receive the facility's industrial stormwater discharges and authorized NSWDs
Yes	Locations of stormwater collection and conveyance systems and associated points of discharge, and direction of flow
Yes	Any structural control measures (that affect industrial stormwater discharges, authorized NSWDs, and run-on)
Yes	All impervious areas of the facility, including paved areas, buildings, covered storage areas, or other roofed structures
Yes	Locations where materials are directly exposed to precipitation
NA	Locations where significant spills or leaks (Section X.G.1.d of the IGP) have occurred
Yes	Areas of industrial activity subject to the IGP
Yes	All storage areas and storage tanks
Yes	Shipping and receiving areas
Yes	Fueling areas
Yes	Vehicle and equipment storage/maintenance areas
Yes	Material handling and processing areas
NA	Waste treatment and disposal areas
No	Dust or particulate generating areas
Yes	Cleaning and material reuse areas
Yes	Any other areas of industrial activity which may have potential pollutant sources

SECTION 3 BEST MANAGEMENT PRACTICES

3.1 MINIMUM BMPS

All minimum BMPs that are required by the IGP and necessary to meet the facility conditions will be implemented. Guidance for BMP implementation is provided in the CASQA Stormwater BMP Handbook Portal: Industrial and Commercial Fact Sheets and the relevant fact sheets are included in Appendix G. Table 3.1 provides a list of the fact sheets and indicates how they relate to the minimum BMPs.

Sections 3.1.1 through 3.1.5 list the requirements for each of these minimum BMPs. Minimum BMPs will be implemented for additional targeted industrial activities, equipment, and materials as necessary. If any of the required minimum BMPs are applicable but cannot be implemented, an explanation and alternative approach will be provided in the following sections.

As required by the IGP, a summary of all implemented BMPs is included in Section 3.3. The schedule for BMP implementation and the requirements for inspection and maintenance are contained in Section 4. BMPs included in the 2018 and 2019 Level 2 ERA Action Plans that have been implemented since, have been be added to the SWPPP.

Table 3.1
Minimum BMPs

CASQA Fact Sheet Number	CASQA BMP Fact Sheet Name	Addresses Minimum IGP BMP Requirements					BMP to be Implemented?		
		Good Housekeeping	Preventative Maintenance	Spill and Leak Prevention and Response	Material Handling and Waste Management	Erosion and Sediment Control	YES	NO	Not Applicable
SC-10	Non-Stormwater Discharges	✓		✓			✓		
SC-11	Spill Prevention, Control, and Cleanup			✓			✓		
SC-20	Vehicle and Equipment Fueling	✓	✓	✓	✓		✓		
SC-21	Vehicle and Equipment Cleaning	✓	✓	✓	✓		✓		
SC-22	Vehicle and Equipment Maintenance and Repair	✓	✓	✓	✓		✓		
SC-30	Outdoor Loading and Unloading	✓		✓	✓		✓		
SC-31	Outdoor Liquid Container Storage	✓	✓	✓	✓		✓		
SC-32	Outdoor Equipment Operations	✓	✓	✓	✓		✓		
SC-33	Outdoor Storage of Raw Materials	✓	✓	✓		✓	✓		
SC-34	Waste Handling and Disposal	✓	✓	✓	✓		✓		
SC-40	Contaminated or Erodible Surfaces					✓			✓
SC-41	Building and Grounds Maintenance	✓		✓	✓		✓		
SC-42	Building Repair, Remodeling, and Construction	✓		✓	✓	✓			✓
SC-43	Parking Area Maintenance	✓	✓	✓			✓		
SC-44	Drainage System Maintenance	✓	✓	✓			✓		
Additional BMPs Implemented:									
Inspection and Cleanout of Storm drains, as needed.		Wash water catch basin for boat washing operations							
Staff Training on Proper Site Maintenance									

3.1.1 Good Housekeeping

The following good housekeeping measures continue to be implemented in accordance with the IGP (Section X.H.1.a):

- Observe all outdoor areas associated with industrial activity including stormwater discharge locations, drainage areas, conveyance systems, waste handling/disposal areas, and perimeter areas impacted by off-facility materials or stormwater run-on to determine housekeeping needs. Any identified debris, waste, spills, tracked materials, or leaked materials will be cleaned and disposed of properly;
- Clean the entire impervious area of the facility, including the parking lots, roads and driveways at least once per year;
- Intensive Pollutant Source Reduction: On a monthly basis between July 1 and September 30, and on a weekly basis between October 1 and June 30, conduct shop vacuuming of dust and debris in stormwater exposed drainage areas including entryways (e.g., roll-up doors) and indoor shop structures to reduce total suspended solids, iron, aluminum, copper, and zinc in the following areas within the active permitted Industrial Area outlined on site map of this SWPPP:
  - Drainage Area 1: starting with the removal of inutile materials and involving hand shop vacuuming around Building 11 (former buoy sandblast building), the bag house area located next to the Building 11, the southwest corner (bone yard and solvent still), and north and south paint booths;
  - Drainage Area 1: in and around Building 10 (the buoy shed), around Building 1 (engineering office and shops), around Building 6 (carpenter storage), around Building 4 (carpenter shop), around Building 5 (power building and compressor), around the aboveground storage tank, and around Building 2 (shops and training);
  - Drainage Area 1: including the SE-1 stormwater sampling location and around staged buoys;
  - Drainage Area 1: around Building 3 (shops and Station San Francisco berthing), areas near CB-2, CB-3, OF-1 , and around the 90-day hazardous waste storage area;
  - Drainage Area 3: around Building 15 (substation #2), around CB-3A, CB-08, around the Building 16 (patrol boat storage), Building 17 (satellite waste accumulation); and
  - Drainage Area 4: around the hazardous materials storage lockers, and around CB-2A.
- Minimize or prevent material tracking;
- Minimize dust generated from industrial materials or activities;
- Ensure that all facility areas impacted by rinse/wash waters are cleaned as soon as possible;
- Cover all stored industrial materials[1] that can be readily mobilized by contact with stormwater;

[1] The permit requires industrial facilities to implement the minimum BMPs "to the extent feasible" and notes that the Discharger can identify BMPs that are implemented in lieu of any of the minimum or applicable advanced BMPs. Regarding the requirement to "cover all stored industrial materials," Section 3.2.1 discusses the use of storm resistant shelters used to cover materials stored outdoors. The facility has moved

- Contain all stored non-solid industrial materials or wastes (e.g., particulates, powders, shredded paper, etc.) that can be transported or dispersed via by the wind or contact with stormwater;
- Prevent discharge of any rinse/wash waters or industrial materials into the stormwater conveyance system; and
- Install and maintain a catch basin insert with shut-off valve at the bilge tank location. Non-stormwater collected in that basin will be removed from the device and disposed of properly.
- Operate and maintain a Permanent Boat Wash installation as follows:
    i. Boat wash operators will receive training in operation of the system prior to operating or maintaining the boat wash, and annually thereafter;
    ii. After each use of the boat wash basin, the boat wash basin will be rinsed to remove any residual material that has not been manually transferred to storage containers, into the drain grates. Residual material will be rinsed into the drain channels towards and into the basin chamber;
    iii. Collected wash water will be disposed of properly; and
    iv. Grit collected in the chamber will be cleaned-out annually during dry season, or as frequently as needed for proper operation.
- Minimize/separate stormwater discharges from non-industrial areas (e.g., stormwater flows from employee parking area) that border industrial areas of the facility; and
- Minimize authorized NSWDs from non-industrial areas (e.g., potable water, fire hydrant testing, etc.) that contact industrial areas of the facility.

Good housekeeping requires maintaining in a clean, orderly manner those areas that may contribute pollutants to stormwater discharges. Good housekeeping practices include sweeping parking lots, storing chemicals in a neat and orderly manner, removing small spills promptly, regular refuse pickup and disposal, inspecting for leaks or conditions that could lead to discharges, good storage and material inventory practices, and maintaining dry, clean floors.

The minimum BMPs to be implemented are summarized in Table 3.1 and the BMP fact sheets are included in Appendix G.

3.1.2 Preventative Maintenance

The following preventative maintenance measures will be implemented in accordance with the IGP (Section X.H.1.b):

- Identify all equipment and systems used outdoors that may spill or leak pollutants;

materials previously stored without cover into buildings. In addition, locations where materials used to be stored uncovered, other BMPs such as sweeping, secondary containment, or temporary covering have been implemented to minimize stormwater quality impacts.

- Observe the identified equipment and systems to detect leaks, or identify conditions that may result in the development of leaks;
- Establish an appropriate schedule for maintenance of identified equipment and systems; and
- Establish procedures for prompt maintenance and repair of equipment, and maintenance of systems when conditions exist that may result in the development of spills or leaks.

The preventive maintenance program includes:

- Timely inspection and maintenance of stormwater management devices (e.g., cleaning oil/water separators, catch basins, etc.);
- Inspection and testing of facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters (including pipes, pumps, storage tanks and bins, pressure vessels, pressure release valves, and process and material handling equipment);
- On a monthly basis between July 1 and September 30, and on a weekly basis between October 1 and June 30, inspect areas where industrial materials or activities are/were exposed to stormwater to ensure proper implementation and maintenance of operational procedures and control measures;
- On a daily basis, observe the bilge water tank system for visible signs of spills, leaks, and conditions that may be indicative of a compromised containment structure or worn-out transfer hoses. Document the observation in the unit watch stander log;
- Observe bilge transfers, and document that proper spill prevention procedures were implemented; and
- Proper maintenance of facility equipment and systems.

The minimum preventative maintenance BMPs to be implemented at the facility are provided in Table 3.1 and the BMP fact sheets are included in Appendix G.

3.1.3 Spill and Leak Prevention and Response

The following spill and leak prevention and response measures will be implemented in accordance with the IGP (Section X.H.1.c):

- Establish procedures and/or controls to minimize spills and leaks;
- Develop and implement spill and leak response procedures to prevent industrial materials from discharging through the stormwater conveyance system. Spilled or leaked industrial materials will be cleaned promptly and disposed of properly;
- Drain fluids from inoperable vehicles and store or dispose of appropriately. Fluids shall be drained to prevent spills and leaks that could contaminate soil or discharge to the storm drain system;
- Identify and describe all necessary and appropriate spill and leak response equipment, location(s) of spill and leak response equipment, and spill or leak response equipment maintenance procedures;
- An inlet insert with shutoff valve is recommended for the drain inlet adjacent to the bilge tank and has been installed.; and
- Identify and train appropriate spill and leak response personnel.

Information and procedures for preventing and responding to spills can be found in the facility's Spill Prevention Control and Countermeasures Plan, and Emergency Procedures Manual. Those documents provide a detailed plan of action to control and minimize potential emergencies, including those that may be caused by spills and leaks. They contain specific information on emergency communications, emergency response agencies, emergency equipment, emergency responses procedures, and employee training.

The minimum spill and leak prevention and response BMPs to be implemented at the Sector SF facility are provided in Table 3.1 and the BMP fact sheets are included in Appendix G.

3.1.4 Material Handling and Waste Management

The following material handling and waste management measures will be implemented in accordance with the IGP (Section X.H.1.d):

- Prevent or minimize handling of industrial materials or wastes that can be readily mobilized by contact with stormwater during a storm event;
- Contain all stored non-solid industrial materials or wastes (e.g., particulates, powders, shredded paper, etc.) that can be transported or dispersed by wind or contact with stormwater during handling;
- Cover industrial waste disposal containers, industrial material storage, and containers that contain industrial materials which are likely to increase stormwater-borne pollutants at the Facility with tarps or other appropriate cover to minimize metal concentrations in run-off;
- Cover all stored materials when not in use;
- Remove from site or store under cover any non-functioning equipment and waste materials;

- Conduct a monthly walk-through to determine if additional materials should be removed from the site or moved indoors;
- Store any buoy chains indoors and shield incidental outdoor storage from exposure to rain;
- Conduct maintenance and repair work indoors to maximum extent practicable;
- Prior to the start of a storm event, to the maximum extent practicable, the Coast Guard will cease outdoor work likely to increase stormwater-borne pollutants and immediately implement administrative and environmental controls (i.e., stop work notice, shop vacuuming, temporary drain covers, and sorbent socks) to prevent non-stormwater discharges;
- Divert run-on and stormwater generated from within the facility away from all stockpiled materials;
- Clean all spills of industrial materials or wastes that occur during handling in accordance with the spill response procedures in the IGP (Section X.H.1.c); and
- Observe and clean as appropriate, any outdoor material or waste handling equipment or containers that can be contaminated by contact with industrial materials or wastes. Keep trash and waste areas free of exposed trash, sediment, and debris.

The minimum material handling and waste management BMPs to be implemented at the Sector SF facility are provided in Table 3.1 and the BMP fact sheets are included in Appendix G.

3.1.5 Erosion and Sediment Controls

There are no areas at the facility that have high potential for significant soil erosion during normal operations. Therefore, only the following erosion and sediment control measures are implemented, in accordance with the IGP (Section X.H.1.e):

- Divert run-on and stormwater generated from within the facility away from all erodible materials; and
- If large areas are disturbed during future construction activities, traditional stormwater controls will be used as appropriate.

The minimum erosion and sediment control BMPs to be implemented at the Sector SF facility are provided in Table 3.1 and the BMP fact sheets are included in Appendix G.

3.1.6 Employee Training Program

An employee training program will be implemented in accordance with the following requirements in the IGP (Section X.H.1.f):

- Ensure that all team members implementing the various compliance activities of this SWPPP are properly trained in topics including but not limited to: BMP implementation, BMP effectiveness evaluations, visual observations, and monitoring activities;
- Prepare or acquire appropriate training manuals or training materials;

- Identify which personnel need to be trained, their responsibilities, and the type of training they will receive;
- Provide a training schedule; and
- Maintain documentation of all completed training classes and the personnel that received training in the SWPPP.

The Pollution Prevention Team will be trained in implementing the various compliance activities specified in this SWPPP, and documentation of training activities must be retained in Appendix C of this SWPPP. To promote stormwater management awareness specific for this facility, refresher training will be provided annually.

Task specific training for all employees engaged in activities that have the potential to cause stormwater pollution will be conducted when new employees are hired, and refresher training will be provided annually.

In-depth pollution prevention training is provided for affected employees. This is provided in a two-tier approach:

- Provide general pollution prevention training to all staff with a periodic refresher. The training objective is to familiarize employees with the actions they should take to protect nearby surface waters/ from accidental industrial pollution. Specifically, its objective is to do the following:
    1. Explain the importance of BMPs in preventing pollution;
    2. Understand and comply with the BMPs for the site; and
    3. List basic spill response steps, what you can and cannot do.
- Provide California-specific training to those who have direct responsibility to implement or manage the site's Storm Water Pollution Prevention Plan or Storm Water Monitoring. It has annual refresher frequency. The training objective is to ensure the site is compliant with the IGP. The trained employees are able to:
    1. Describe the purpose of the General Permit;
    2. List types of Authorized and Unauthorized Non-Storm Water Discharge;
    3. Explain purpose of SWPPP and retention and revision requirements;
    4. Describe 3 types of visual observations and what items to document;
    5. Describe sampling requirements;
    6. List items included in Annual Report; and
    7. Identify Additional Parameters that may apply to the site.

This facility is at Level 2 ERA status for various metals, pH, and TSS; therefore, a QISP or designee is required to provide training to civilian and military Facility engineering personnel who work on activities that are likely to increase stormwater-borne pollutants within the designated industrial area of the Facility. This training will discuss proper procedures for managing stormwater discharges associated with such industrial activities. This training will be provided at the time of civilian employment or military assignment and annually thereafter.

Training will be overseen by the principal environmental specialist or other qualified pollution prevention team member who will be responsible for providing information during training sessions and subsequently completing the training logs shown in Appendix C, which identifies the site-specific stormwater topics covered as well as the names of site personnel who attended the meeting. Each team member will be trained in the specific role they are responsible to undertake.

3.1.7 Quality Assurance and Record Keeping

The following quality assurance and record keeping activities will be performed in accordance with the requirements in the IGP (Section X.H.1.g):

- Develop and implement management procedures to ensure that appropriate staff implements all elements of the SWPPP, including the MIP (SWPPP Section 5);
- Develop a method of tracking and recording the implementation of BMPs identified in the SWPPP; and
- Maintain the BMP implementation records, training records, and records related to any spills and clean-up related response activities for a minimum of five (5) years as required in the IGP (Section XXI.J.4).

BMPs will be implemented according to the schedule and procedures presented in SWPPP Section 4. BMPs will be implemented by properly trained team members as documented in Appendix C.

Visual observations will be performed as described in SWPPP Section 5.5. Potential pollutant sources and BMPs will be inspected during visual observations, and new BMPs will be implemented as needed. Records of visual observations of BMP implementation will be retained in Appendix H.

Good recordkeeping and reporting procedures help to identify and communicate information about potential stormwater contamination and assure that appropriate measures are taken. This SWPPP includes records of incidents, such as spills or other discharges, along with other information describing the quality and quantity of stormwater discharges. Inspections and measures taken are documented, and records of these activities are included in this SWPPP.

Paper or electronic records of documents required by this SWPPP must be retained for a minimum of five (5) years from the date generated or date submitted, whichever is later, for the following items:

- Employee Training Records;
- BMP Implementation Records;
- Spill and Clean-up Related Records;
- Records of Monitoring Information
    - The date, exact location, and time of sampling or measurement;

  - The date(s) analyses were performed;
  - The individual(s) that performed the analyses;
  - The analytical techniques or methods used; and
  - The results of such analyses;
- Level 1 ERA Reports;
- Level 2 ERA Action Plan;
- Level 2 ERA Technical Report; and
- Annual Reports.

3.2 ADVANCED BMPS

There are currently several advanced BMPs at the Sector SF facility. The following subsections discuss the implemented advanced BMPs.

3.2.1 Exposure Minimization BMPs

Exposure minimization BMPs currently in place include shelters for hazardous materials and hazardous waste, including secondary containment. Containment volumes are based on the Sector's Spill Prevention, Control and Countermeasure Plan, on file at the facility.

Table 3.2 is provided for exposure minimum BMPs being used at the facility.

Table 3.2
Exposure Minimization BMPs

Shelter Location/Description	Associated Industrial Activity/Material
Nine Hazardous materials storage lockers with integral Secondary Containment (275 gallons each)	Hazmat Storage
Hazardous Waste Shelter with 210-gallon Secondary Containment	Hazardous Waste Accumulation
Bilge Water Storage 3220 gallons net Secondary Containment	Bilge water storage

See Site Plan(s) for locations of these BMPs

3.2.2 Stormwater Containment and Discharge-Reduction BMPs

Stormwater containment and discharge-reduction BMPs include BMPs that divert, reuse, contain, or reduce the volume of stormwater runoff. Stormwater containment and discharge-reduction BMPs are not applicable at the Sector SF facility; however, if these types of BMPs are implemented in the future, they will be provided in Table 3.3 and the BMP fact sheets will be included in Appendix G.

The Sector SF is minimizing the number of outfalls that drain its stormwater runoff to the Bay. Following activities are being implemented to that end:

- The facility has a number of legacy catch basins and floor drains in Drainage Area 1 that date back to the pre-1950 era. Three of those drains (i.e., FD-01, CB-01 and a drain near Building 4) appear to be connected to piping that previously discharged to the Bay. That outfall has been connected to the sanitary sewer in recent years and these site drains have been permanently plugged in early 2020.
- Catch basins CB-02 and CB-03 used to drain to OF-01, however the connecting pipe was found to be plugged in December 2019. These drains have been permanently plugged in early 2020.
- Outfall OF-3 receives water from CB-05. That catch basin is also slated for plugging with a solid metal lid, as site grading directs the vast majority of local runoff towards CB-08 (and OF-4) rather than to CB-05.

Table 3.3
Stormwater Containment and Discharge-Reduction BMPs

CASQA Fact Sheet Number	CASQA BMP Factsheet Name	Meets Advanced BMP Requirement	BMP Used		BMP Location, Runoff Sources, and Potential Pollutants
			YES	NO	
TC-10	Infiltration Trench			✓	
TC-11	Infiltration Basin			✓	
TC-12	Harvest and Reuse			✓	
TC-20	Wet Pond			✓	
TC-21	Constructed Wetland			✓	
TC-22	Extended Detention Basin			✓	
TC-30	Vegetated Swale			✓	
TC-31	Vegetated Buffer Strip			✓	
TC-32	Bioretention			✓	
TC-40	Media Filter			✓	
TC-50	Water Quality Inlet			✓	
TC-60	Multiple Systems			✓	
MP-20	Biotreatment			✓	
MP-40	Stormwater Filter			✓	
MP-50	Wet Vault			✓	
MP-51	Gravity Separator			✓	
MP-52	Drain Inlet Insert			✓	
Alternate BMPs Used:					If used, state reason:

3.2.3 Treatment Control BMPs

Treatment control BMPs include one or more mechanical, chemical, biologic, physical, or any other treatment process technology that is sized to meet the treatment control design storm standard. Solids separation is a treatment Control BMP currently implemented at the boat wash installation. Table 3.4 is provided below if the Sector SF facility chooses to implement any additional treatment control BMPs. Facts sheets for BMPs implemented at the Sector SF facility will be included in Appendix G.

3.2.4 Other Advanced BMPs

There are currently no other advanced BMPs onsite.

3.2.5 BMP Effectiveness in Preventing NSWDs

The BMPs listed in the preceding sections appear effective in preventing NSWDs, as no unallowed NSWDs have been observed or reported at the facility. Containment measures appear adequate to catch the most likely maximum spill scenarios. Maintenance operations are performed indoors. In addition, the valved catch basin insert near the bilge water tank, which was installed in Spring 2020, is a major improvement in preventing unauthorized NSWDs.

The new boat wash installation has been in operation for a number of months and appears to adequately capture boat wash water for discharge to the sanitary sewer. More time is needed to more thoroughly evaluate its effectiveness.

The NSWD-related BMPs do not have an effect on legacy metals contamination that was generated by past dry buoy operations and contamination that was likely aerially deposited by the overhead Bay Bridge freeway and recent bridge demolition and construction work.

Table 3.4
Treatment Control BMPs

CASQA Fact Sheet Number	CASQA BMP Factsheet Name	Addresses O&M for Advanced BMPs	BMP Used		BMP Location, Runoff Sources, and Potential Pollutants
			YES	NO	
TC-10	Infiltration Trench			✓	
TC-11	Infiltration Basin			✓	
TC-12	Harvest and Reuse			✓	
TC-20	Wet Pond			✓	
TC-21	Constructed Wetland			✓	
TC-22	Extended Detention Basin			✓	
TC-30	Vegetated Swale			✓	
TC-31	Vegetated Buffer Strip			✓	
TC-32	Bioretention			✓	
TC-40	Media Filter			✓	
TC-50	Water Quality Inlet			✓	
TC-60	Multiple Systems			✓	
MP-20	Biotreatment			✓	
MP-40	Stormwater Filter			✓	
MP-50	Wet Vault			✓	
MP-51	Gravity Separator		✓		Implemented at boat wash installation.
MP-52	Drain Inlet Insert		✓		In place at the drain inlet adjacent to bilge water storage tank.
Alternate BMPs Used:					If used, state reason:

3.3 BMP SUMMARY TABLE

Table 3.5 summarizes the activities, materials, pollutant sources, potential pollutants, and BMPs being implemented to prevent discharge of pollutants in stormwater runoff. Descriptions of the specific BMPs being implemented were provided in previous subsections. Implementation and maintenance of BMPs is described in Section 4.

Table 3.5
BMP Summary Table

Activity/Material	Pollutant Sources	Potential Pollutants	BMPs Implemented	CASQA BMP Fact Sheet Number
Buoy Staging	Paint flakes from contact with pavement	Copper, Iron, Zinc, TSS	Non-Stormwater Discharges; Spill prevention, Control, and Intensive Cleanup;	SC-10; SC-11;
Anchor Chain Storage (Non-Industrial)	Rain washing rust off chains	Iron, Zinc, TSS	Indoor storage only.	SC-33
Small Boat Washing	Overtopping of mobile sump; spills or leaks	Metals, Oil & Grease, Synthetic Pollutants	Dedicated boat wash pad with permanent sump. Non-Stormwater Discharges; Spill prevention, Control, and Cleanup; Vehicle and Equipment Cleaning	SC-10; SC-11; SC-22; SC-21
Bilge Water Receiving / Disposal	Spills or leaks during transfer operations	Oil & Grease, Diesel fuel, Hydrocarbons, TSS, Metals	Non-Stormwater Discharges; Spill prevention, Control, and Cleanup; Outdoor Loading and Unloading; Outdoor Liquid Container Storage; Outdoor Storage of Raw Materials	SC-10; SC-11; SC-30, SC-31, SC-33
Waste Management	Leaks from waste containers	Gross Pollutants Metals, Oil & Grease, Synthetic Pollutants	Waste Handling and Disposal	SC-34
Aboveground Bulk (≥55 gal) Chemical Storage Areas	Spills or leaks from storage areas	Oil & Grease, Organic and Inorganic Chemicals, pH	Covered storage; Non-Stormwater Discharges; Spill prevention, Control, and Cleanup; Outdoor Loading and Unloading; Outdoor Liquid Container Storage	SC-10; SC-11; SC-30, SC-31
Diesel Above-Ground Storage Tank(s)	Spills or leaks during fuel delivery	Diesel Fuel	Vehicle and Equipment Fueling	SC-20
Facility Roads/Grounds (Paved/Unpaved), Parking Areas	Potential leaks from vehicles	Oil & Grease, TSS	Building and Grounds Maintenance; Parking Area Maintenance	SC-41; SC-43
Equipment Maintenance and Repair	Spills or leaks during maintenance	Oil & Grease, Metals, Synthetic Organics	Vehicle and Equipment Maintenance and Repair; Workshops to shelter activity	SC-22

Table 3.5
BMP Summary Table

Activity/Material	Pollutant Sources	Potential Pollutants	BMPs Implemented	CASQA BMP Fact Sheet Number
Maintenance Shop	Spills or leaks during maintenance	Oil & Grease, Metals, Synthetic Organics	Vehicle and Equipment Maintenance and Repair; housekeeping	SC-22
Adjacent industry and ambient pollution aerially deposited on site	Nearby roads, Bay Bridge	TSS, Metals	Parking Area Maintenance, Drainage System Maintenance; Drain Inserts	SC-43, SC-44; MP52
General Activities / All Storage	Spills or leaks during maintenance; metals shavings	TSS, Metals, O&G	Weekly and monthly inspections industrial areas	N/A
Bilge Water Receiving / Disposal	Spills or leaks during transfer operations	Oil & Grease, Diesel fuel, Hydrocarbons, TSS, Metals	Bilge water tank daily observations and logging	N/A
Legacy maintenance activities	Metals shavings during maintenance, fluid spills	TSS, Metals, O&G	Intensive pollutant source reduction	N/A
General Activities / All Storage	Spills or leaks during maintenance; metals shavings	TSS, Metals, O&G	Pre-rain protocol	N/A
General Activities / All Storage	Spills or leaks, during maintenance; metals shavings	TSS, Metals, O&G	Material storage under cover or indoors	N/A
General Activities / All Storage	General Activities	TSS, Metals, O&G	Training and awareness	N/A

SECTION 4 BMP IMPLEMENTATION

4.1 ACTIVE IGP BMP IMPLEMENTATION SCHEDULE

BMPs will be implemented as necessary to reduce or prevent transport of industrial pollutants in stormwater runoff. Records of BMP implementation will be included in Appendix H.

Most BMPs are implemented at all times as part of standard operating procedures. Others are implemented annually or as needed. Table 4.1 provides a schedule for implementing all minimum and advanced BMPs. Additional BMPs are provided in Table 3.5 as they are deemed necessary relative to site operations and activities.

Table 4.1
BMP Implementation Schedule

BMP Description	Person Responsible for Implementing BMP	Implementation Duration
Good Housekeeping	Site Personnel	All times
Spill response, spill and overflow protection, secondary containment	Site Personnel	All times
Check for leaks	Site Personnel	All times
Proper containment and disposal of waste. Waste storage to be shielded from rain.	Site Personnel	All times
Use of low/non-toxic materials	Site Personnel	All times
Housekeeping	Site Personnel	All times
Analytical testing prior to release of storm water in secondary containment to sewer	Site Personnel	As-needed
Install safeguarding against accidental releases	Site Personnel	As-needed
Stormdrain cleanout	Site Personnel	Annually
Street sweeping; intensive cleanup of pollutants in solid form	Site Personnel	As-needed, at least prior to first major storm event.
Indoor Buoy Chain Storage	Site Personnel	All Times
Conducting Work Indoors to the extent practical	Site Personnel	All Times

Table 4.1
BMP Implementation Schedule

BMP Description	Person Responsible for Implementing BMP	Implementation Duration
Weekly and monthly inspections industrial areas	LRP or delegate	Weekly (Oct 1 – June 30) Monthly (July 1 – Sept 30)
Bilge water tank observations and logging	LRP or delegate	Daily
Intensive pollutant source reduction	Site Personnel	Weekly (Oct 1 – June 30) Monthly (July 1 – Sept 30)
Overhaul buoys off-site	Sector Commander	Completely cease on-site routine buoy maintenance, starting Fall 2019
Pre-rain protocol	LRP or delegate	Prior to any rain with forecast intensity ≥0.125 inch per hour
Material storage under cover or indoors	Site Personnel	All Times
Training and awareness	Site Personnel	Annually

4.2 ACTIVE IGP BMP INSPECTION AND MAINTENANCE

The IGP requires, at a minimum, monthly observations of BMPs, along with inspections during sampling events. Monthly observations will be conducted during daylight hours of scheduled facility operating hours and on days without precipitation. A BMP observation checklist must be filled out for and maintained on-site with the SWPPP. The observation checklist includes the necessary information as discussed in Section 5.5. A blank observation checklist can be found in Appendix I, and completed checklists must be archived in Appendix H.

BMPs must be maintained regularly to ensure proper and effective functionality. If necessary, corrective actions must be implemented within 72 hours of identified deficiencies and associated amendments to the SWPPP will be prepared and documented.

Specific guidance for maintenance, observation, and repair of advanced BMPs can be found in the BMP Factsheets in Appendix G.

SECTION 5 ACTIVE IGP MONITORING IMPLEMENTATION PLAN

5.1 PURPOSE

This MIP was developed to address the following objectives:

1. Identify the monitoring team;
2. Describe weather and rain-event tracking procedures;
3. Describe discharge locations, visual observations procedures
4. Describe visual observation response procedures;
5. Describe sample collection and handling procedures;
6. Describe field instrumentation calibration instructions and intervals;
7. Provide justification for alternative discharge locations, Representative Sample Reduction (RSR), and Qualified Combined Samples (QCS), as applicable; and
8. Provide an example Chain of Custody (CoC) form to be used when handling and shipping water quality samples to the laboratory.

5.2 WEATHER AND RAIN EVENT TRACKING

Stormwater sampling and visual observations will be conducted during Qualified Storm Events (QSEs). A QSE is defined as any precipitation event that produces a discharge for at least one drainage area and is preceded by 48 hours with no discharge from any drainage area. Weather and precipitation forecasts can be utilized, as needed, to track and identify potential QSEs.

On a weekly basis, the Coast Guard will monitor the National Weather Service Seven-Day Forecast for San Francisco, California, and will institute the a pre-rain protocol (see Section 5.5 below) when a 0.125 inch per hour precipitation forecast is predicted for the facility during scheduled facility operating hours.

When targeting a QSE for stormwater sampling, the appropriate team member can consult the National Oceanographic and Atmospheric Administration (NOAA) (or equivalent) for weather forecasts in order to predict QSE timing and prepare sampling staff. NOAA forecasts can be obtained at http://www.srh.noaa.gov/. If weekly forecasts indicate potential for significant precipitation, the weather forecast can be closely monitored during the 48 hours preceding the event. If utilized, weather reports with precipitation data may be printed and included with the SWPPP in MIP Attachment 1 “Weather Reports” to document precipitation totals and antecedent conditions.

5.3 MONITORING LOCATIONS

Monitoring locations are shown on the Site Map(s) in Appendix A. Monitoring locations are described in Section 5.6.

Whenever changes in facility operations might affect the appropriateness of sampling locations, the sampling locations will be revised accordingly. All such revisions will be implemented as soon as feasible and the SWPPP amended.

5.4 SAMPLE COLLECTION AND VISUAL OBSERVATION EXCEPTIONS

The collection of samples or conducting visual observations is not required under the following conditions:

- During dangerous weather conditions such as flooding and electrical storms; and
- Outside of scheduled site business hours.

Scheduled site business hours are presented in Section 2.2.

If monitoring (visual observations or sample collection) of the site is unsafe because of dangerous conditions noted above, the appropriate team member must document why monitoring was not performed. The exception documentation must be filed in MIP Attachment 2 “Monitoring Records”.

5.5 VISUAL OBSERVATION PROCEDURES

Visual observations include observations of drainage areas, BMPs, and discharge locations.

- Observations of BMPs are required to identify and record BMPs that need maintenance to operate effectively, that have failed, or that could fail to operate as intended;
- Observations of the drainage areas are required to identify any spills, leaks, uncontrolled pollutant sources, and non-stormwater discharges;
- Observations of discharge locations are required to identify the presence of visible pollutants in stormwater discharged from the facility; and

Visual observations will be performed at least once every calendar month during dry conditions. Visual observations will also be performed during stormwater sampling events when discharge is occurring.

5.5.1 Monthly Visual Observations

Monthly visual observations are necessary to document the presence of and to identify the source of any pollutants and non-stormwater flows. These should consist of observations of the outdoor facility operations, BMPs, and NSWD observations.

In the event that monthly visual observations are not performed, an explanation must be provided in the annual report.

5.5.1.1 Outdoor Facility Operations Observations

Observe potential sources of industrial pollutants including industrial equipment and storage areas, and outdoor industrial activities. Record observations of:

- Spills or leaks; and
- Uncontrolled pollutant sources.

5.5.1.2 BMP Observations

Observe BMPs to identify and record:

- BMPs that are properly implemented;
- BMPs that need maintenance to operate effectively;
- BMPs that have failed; or
- BMPs that could fail to operate as intended.

5.5.1.3 Non-Stormwater Discharge Observations

Observe each drainage area for the presence of or indications of prior unauthorized and authorized non-stormwater discharges. Record:

- Presence or evidence of any non-stormwater discharge (authorized or unauthorized);
- Pollutant characteristics (floating and suspended material, sheen, discoloration, turbidity, odor, etc.); and
- Source of discharge.

For authorized non-stormwater discharges, also document whether BMPs are in place and are functioning to prevent contact with materials or equipment that could introduce pollutants.

5.5.2 Pre-Rain Event Protocol

On a weekly basis, the Coast Guard will monitor the National Weather Service Seven-Day Forecast for San Francisco, California, and will institute the following pre-rain protocol when a 0.125 inch per hour precipitation forecast is predicted for the facility during scheduled facility operating hours:

Prevent or minimize handling of materials or wastes likely to increase stormwater-borne pollutants that can be readily mobilized by contact with storm water during a storm event;

Contain all stored industrial materials or wastes (e.g., particulates, powders, shredded paper, etc.) that can be transported or dispersed by the wind or contact with storm water;

Cover waste disposal containers and material storage containers that contain materials likely to increase stormwater-borne pollutants when not in use;

Divert run-on and stormwater generated from within the Facility away from all stockpiled materials;

Observe and clean as appropriate, any outdoor material or waste handling equipment or containers that might have been contaminated by contact with industrial materials or wastes.

5.5.3 Sampling Event Visual Observations

Sampling event visual observations evaluate the general appearance of the stormwater as an indicator of potential pollutants. These observations will be conducted at the same time sampling occurs at the discharge locations identified in Section 5.6.2. At each discharge location where a sample is obtained, record observations of:

- Floating and suspended materials;
- Oil and grease;
- Discoloration;
- Turbidity;
- Odors; and
- Trash.

When pollutants are observed in the discharged stormwater, follow-up observations of the drainage area will be conducted to identify the probable source of the pollutants.

In the event that a discharge location is not visually observed during the sampling event, the location of the discharge and reasoning for not obtaining observations must be recorded.

5.5.4 Visual Observation Procedures

Visual observations will be conducted by trained team members. The name(s) and contact number(s) of the site visual observation personnel are listed in Appendix D and their training qualifications are provided in Appendix C.

Visual observations will be documented on the Visual Observation Log (see MIP Attachment 3 "Example Forms"). Visual observations will be supplemented with a site-specific BMP inspection checklist. Photographs used to document observations will be referenced on the Visual Observation Log and maintained with the Monitoring Records in Attachment 2.

The completed logs and checklists will be kept in MIP Attachment 2 "Monitoring Records."

5.5.5 Visual Observation Follow-Up and Reporting

Correction of deficiencies identified by the observations, including required repairs or maintenance of BMPs, will be initiated and completed as soon as possible. Response actions will include the following:

- Report observations to the Pollution Prevention Team Leader or designated individual;
- Identify and implement appropriate response actions;
- Determine if SWPPP update is needed;
- Verify completion of response actions; and
- Document response actions.

If identified deficiencies require design changes, including additional BMPs, the implementation of changes will be completed as soon as possible, and the SWPPP will be amended to reflect the changes.

BMP deficiencies identified in site observation reports and correction of deficiencies will be tracked on the BMP Observation Checklist and will be retained in Appendix I.

Results of visual observations must be summarized and reported in the Annual Report.

5.5.6 Visual Observation Locations

The observations identified in Sections 5.5.1 and 5.5.2 will be conducted at the locations identified in this section.

Visual observation locations are shown on the Site Map(s) in SWPPP Appendix A.

There are four drainage areas on-site; Drainage Area 1 through 4. Drainage areas are shown on the Site Map(s) in Appendix A. The related storm drain inlets and outfalls are shown on the Site Map(s) in Appendix A. There are no stormwater storage or containment area(s) onsite.

5.6 SAMPLING AND ANALYSIS PROCEDURES

This section describes the methods and procedures that should be followed for stormwater sampling and analysis. It contains information for sampling schedule, sampling locations, monitoring preparation, analytical constituents, sample collection, sample analysis, and data evaluation and reporting.

5.6.1 Sampling Schedule

Stormwater samples at each discharge location must be collected and analyzed from two (2) QSEs within the first half of each reporting year (July 1 to December 31), and two (2) QSEs within the second half of each reporting year (January 1 to June 30).

A QSE is a precipitation event that:

- Produces a discharge for at least one drainage area; and
- Is preceded by 48 hours with no discharge from any drainage area.

5.6.2 Sampling Locations

Sampling locations include all locations where stormwater is discharged from the site. Discharge locations are shown on the Site Map(s) in Appendix A.

Six discharge locations have been identified on the project site for the collection of stormwater runoff samples, as provided in Table 5.1.

Table 5.1
Sample Locations

Sample Location Number	Sample Location Description
SE-1	SE corner of paint booth and receives flow from Drainage Area 1
WH-1	Eastern edge of wharf and receives flow from southern portion of Drainage Area 1
WH-2	Eastern edge of wharf and receives flow from central portion of Drainage Area 1
WH-3	Eastern edge of wharf and receives flow from northern portion of Drainage Area 1
WH-4	Eastern edge of wharf and receives flow from northern portion of Drainage Area 1
OF-4	Runoff entering CB-08, adjacent to Bilge Water Tank, and receives flow from Drainage Area 3

5.6.3 Monitoring Preparation

Samples on the project site will be collected by the sampling personnel listed in Appendix D.

An adequate stock of monitoring supplies and equipment for sampling should be available onsite prior to a sampling event. Monitoring supplies and equipment should be stored in a cool temperature environment that will not come into contact with rain or direct sunlight. Sampling personnel will be available to collect samples in accordance with the sampling schedule. Supplies maintained at the facility should include, but are not limited to: clean powder-free nitrile gloves; sample collection equipment; coolers; appropriate number and volume of sample containers; identification labels; re-sealable storage bags; paper towels; personal rain gear; ice; and Sampling Field Log Sheets and Chain of Custody (CoC) forms, which are provided in MIP Attachment 3 “Example Forms”.

5.6.4 Analytical Constituents

Table 5.2 identifies the constituents identified for sampling and analysis.

Table 5.2
Analytical Constituents

Constituent	Reason
pH	IGP permit required constituent
Oil and grease	IGP Permit required constituent
Total Suspended Solids	IGP Permit required constituent
Aluminum (Total)	Table 1 parameters
Copper (Total)	Source Identification
Iron (Total)	Table 1 parameters
Lead	Source Identification
Zinc	Source Identification

Since the current IGP became effective, stormwater samples collected at Sector SF have also been analyzed for cadmium and chromium. However, no cadmium concentrations were found that approached the NAL and no sources of cadmium and chromium have been identified at the site. In addition, there is no established NAL for chromium. Therefore, cadmium and chromium analysis may be removed from the list of analytes.

5.6.5 Sample Collection

Samples of discharge must be collected at the designated sampling locations shown on the Site Map(s) in Appendix A. Samples from each discharge location is required to be collected within four (4) hours of:

- The start of the discharge; or
- The start of facility operations if the QSE occurs within the previous 12 hour period.

Sample collection is required only during scheduled facility operating hours and when sampling conditions are safe.

Grab samples must be collected and preserved in accordance with the methods identified in Table 5.3, "Sample Collection, Preservation and Analysis for Water Quality Samples" provided in Section 5.6.6. Only team members properly trained in water quality sampling will collect samples.

The facility is not subject to Subchapter N ELGs mandating pH analysis, but has entered Level 1 status for pH. Grab samples will be collected and analyzed for pH using a pH meter. The pH analysis will be performed as soon as practicable, but no later than 15 minutes after sample collection.

Samples from different discharge locations will not be combined or composited prior to shipment to the analytical laboratory. Sample collection and handling requirements are described in Section 5.8.

5.6.6 Sample Analysis

Samples will be analyzed using the analytical methods identified in Table 5.3.

Samples will be analyzed by the following laboratory or any State-qualified laboratory offering the required analytical methods:

Laboratory Name:	TestAmerica1220 Quarry Lane
Street Address:	1220 Quarry Lane
City, State Zip:	Pleasanton, CA 94566
Telephone Number:	(925)484-1919
Point of Contact:	N/A
ELAP Certification Number:	1551, 2728, 2922

Samples will be delivered to the laboratory by:

Facility Personnel	☐	Yes	☒	No
Picked up by Laboratory Courier	☒	Yes	☐	No
Shipped	☐	Yes	☒	No

Table 5.3
Sample Collection, Preservation and Analysis for Water Quality Samples

Constituent	Analytical Method*	Minimum Sample Volume	Sample Containers	Sample Preservation	Reporting Limit	Maximum Holding Time
pH**	SM4500-H+	500 mL	Not Applicable. Field test.	Not Applicable. Field test.	--	15 minutes
Oil and Grease**	EPA 1664A	500 mL	500 mL polyethylene	Chilled to 4°C	15 mg/L	7 days
Total Suspended Solids**	SM 2540-D	500 mL	500 mL amber glass	H_2SO_4, Chilled to 4°C	10 mg/L	28 days
Aluminum(total)**	200.7	500 mL***	500 mL HDPE	HNO3 to pH <2	0.1 mg/L	6 months
Chromium	200.7	500 mL***	500 mL HDPE	HNO3 to pH <2	0.0025 mg/l	6 months
Copper	200.7	500 mL***	500 mL HDPE	HNO3 to pH <2	0.0050 mg/l	6 months
Iron (total)**	200.7	500 mL***	500 mL HDPE	HNO3 to pH <2	0.02 mg/L	6 months
Lead (total)	200.7	500 mL***	500 mL HDPE	HNO3 to pH <2	0.0050 mg/l	6 months
Zinc (total)	200.7	500 mL***	500 mL HDPE	HNO3 to pH <2	0.012 mg/l	6 months

Notes:
SM – Standard methods for the Examination of Water and Wastewater, 18th edition
EPA – U.S. EPA test methods
*Discharger will use the listed or an equivalent/appropriate Analytical Method
**Minimum parameters required by this General Permit
***For total metals, one 500 ml bottle is sufficient sample volume for all listed tests.

5.6.7 Data Evaluation and Reporting

The designated member of the Pollution Prevention Team will complete an evaluation of the water quality sample analytical results.

All sampling and analytical results for all individual samples will be submitted via SMARTS within 30 days of obtaining all results for each sampling event.

The method detection limit will be provided when an analytical result from samples taken is reported by the laboratory as a "non-detect" or less than the method detection limit. A value of zero will not be reported.

Analytical results that are reported by the laboratory as below the minimum level (often referred to as the reporting limit) but above the method detection limit will be provided.

Reported analytical results will be compared to parameter NAL values in accordance with the requirements of the IGP (Table 5.4). Two types of potential NAL exceedances exist, as follows:

- Annual NAL exceedance: determine the average concentration for each parameter using the results of all the sampling and analytical results for the entire facility for the reporting year. The average concentration will be compared to the corresponding annual NAL parameter value in Table 5.4 below. An annual NAL exceedance occurs when the average of all the analytical results for a parameter from samples taken within a reporting year exceeds the annual NAL value for that parameter.

- Instantaneous maximum NAL exceedance: compare all sampling and analytical results from each distinct sample to the corresponding instantaneous parameter value in Table 5.4 below. An instantaneous maximum NAL exceedance occurs when two or more analytical results from samples taken from any single parameter within a reporting year exceed the instantaneous maximum NAL value (for Oil and Grease and Total Suspended Solids) or are outside of the instantaneous maximum NAL for pH.

Table 5.4
Parameter NAL Values*

Parameter	Reporting Units	Annual NAL*	Instantaneous Maximum NAL*
pH	pH Units	N/A	Less than 6.0, greater than 9.0
Oil and Grease	mg/L	15	25
Total Suspended Solids	mg/L	100	400
Aluminum, Total	mg/L	0.75	N/A
Chromium, Total	mg/L	N/A	N/A
Copper, Total	mg/L	0.0332	N/A
Iron, Total	mg/L	1.0	N/A
Parameter	Reporting Units	Annual NAL*	Instantaneous Maximum NAL*
Lead, Total	mg/L	0.262	N/A
Zinc, Total	mg/L	0.26	N/A

*Concentrations from General Permit, Section XI.B, Table 2

Reported analytical results will be averaged automatically by SMARTS at the end of the reporting year. For any calculations required by the IGP, a value of zero shall be used for all effluent sampling analytical results that are reported by the laboratory as “non-detect" or less than the Method Detection Limit (MDL).

5.7 TRAINING OF SAMPLING PERSONNEL

Sampling personnel will be trained to collect, maintain, and ship samples in accordance with the IGP and this SWPPP. Name(s) of stormwater sampler(s) and alternate(s) who have received stormwater training are provided in Appendix D, which includes a list of their training courses and sampling experience. Training records of designated sampling personnel are provided in Appendix C.

5.8 SAMPLE COLLECTION AND HANDLING

5.8.1 Sample Collection

Samples should be collected at the designated sampling locations shown on the Site Map(s) and listed in the preceding sections when viable sampling conditions occur during a QSE. Samples will be collected, maintained and shipped in accordance with the requirements in the following sections.

Grab samples will be collected and preserved in accordance with the methods identified in preceding sections.

To maintain sample integrity and prevent cross-contamination, sample collection personnel should follow the protocols below.

- Collect samples (for laboratory analysis) only in analytical laboratory-provided sample containers;
- Consider wearing clean, powder-free nitrile gloves when collecting samples;
- If utilized, change gloves whenever something not known to be clean has been touched;
- If utilized, change gloves between sites;
- Decontaminate any reusable equipment (e.g., bucket, tubing) prior to sample collection (i.e. using a combination of trisodium phosphate water wash and distilled water rinse). Dispose of any wash and rinse water appropriately (i.e. do not discharge to storm drain or receiving water). Do not decontaminate laboratory provided sample containers;
- Do not smoke during sampling events;
- Never sample near a running vehicle;
- Do not park vehicles in the immediate sample collection area (even non-running vehicles);
- Do not eat or drink during sample collection; and
- Do not breathe, sneeze, or cough in the direction of an open sample container.

The most important aspect of grab sampling is to collect a sample that represents the entire runoff stream. Typically, samples are collected by dipping the collection container in the runoff flow paths and streams as noted below.

- For small streams and flow paths, simply dip the bottle facing upstream until full;
- For larger stream that can be safely accessed, collect a sample in the middle of the flow stream by directly dipping the mouth of the bottle. Once again making sure that the opening of the bottle is facing upstream as to avoid any contamination by the sampler;
- For larger streams that cannot be safely accessed (such as manhole samples), pole-samplers may be used to safely access the representative flow;
- Avoid collecting samples from ponded, sluggish or stagnant water;
- Do not stand upstream of the sampling point within the flow path; and
- Avoid introducing accumulated sediment from the bottom of the sampled structure

Note, that depending upon the specific analytical test, some containers may contain preservatives. These containers should **never** be dipped into the stream, but filled indirectly from the collection container.

5.8.2 Sample Handling

Field pH measurements must be conducted immediately. Do not store pH samples for later measurement.

Samples for laboratory analysis must be handled as follows. Immediately following sample collection:

- Cap sample containers;
- Complete sample container labels;
- Place sealed containers in a re-sealable storage bag;
- Place sample containers into an ice-chilled cooler; or refrigerator;
- Document sample information on the Sampling Field Log Sheet; and
- Complete the CoC.

All samples for laboratory analysis must be maintained between 0 to 6 degrees Celsius during delivery to the laboratory. Samples must be kept on ice, or refrigerated, from sample collection through delivery to the laboratory. Place samples to be shipped inside coolers with ice or refrigerator (prior to pick-up/shipment). Make sure the sample bottles are well packaged to prevent breakage and secure cooler lids with packaging tape.

Ship samples that will be laboratory analyzed to the analytical laboratory right away. Hold times are measured from the time the sample is collected to the time the sample is analyzed. The IGP requires that samples be received by the analytical laboratory within 48 hours of the physical sampling (unless required sooner by the analytical laboratory).

5.8.3 Sample Documentation Procedures

All original data documented on sample bottle identification labels, Sampling Log, and CoCs will be recorded using waterproof ink. If an error is made on a document, sampling personnel will make corrections by lining through the error and entering the correct information. The erroneous information will not be obliterated. All corrections will be initialed and dated.

Duplicate samples will be identified consistent with the numbering system for other samples to prevent the laboratory from identifying duplicate samples. Duplicate samples will be identified in the Sampling Log.

Sample documentation procedures include the following:

Sample Bottle Identification Labels: Sampling personnel will attach an identification label to each sample bottle. Sample identification will uniquely identify each sample location.

Field Log Sheets: Sampling personnel will complete the Effluent Sampling Field Log Sheet and Receiving Water Sampling Field Log Sheet for each sampling event, as appropriate.

Chain of Custody: Sampling personnel will complete the CoC for each sampling event for which samples are collected for laboratory analysis. The sampler will sign the CoC when the sample(s) is turned over to the testing laboratory or courier.

5.9 QUALITY ASSURANCE AND QUALITY CONTROL

An effective Quality Assurance and Quality Control (QA/QC) plan will be implemented as part of the MIP to ensure that analytical data can be used with confidence. QA/QC procedures to be initiated may include, but are not limited to, the following:

- Field logs;
- Clean sampling techniques;
- Field Instrument Calibration;
- CoCs;
- QA/QC Samples; and
- Data verification.

Each of these procedures is discussed in more detail in the following sections.

5.9.1 Field Logs

The purpose of field logs is to record sampling information and field observations during monitoring that may explain any uncharacteristic analytical results. Sampling information to be included in the field log include the date and time of water quality sample collection, sampling personnel, sample container identification numbers, and types of samples that were collected. Field observations should be noted in the field log for any abnormalities at the sampling location (color, odor, BMPs, etc.). Field measurements for pH and turbidity should also be recorded in the field log. A Visual Inspection Field Log, an Effluent Sampling Field Log Sheet, are included in MIP Attachment 3 “Example Forms”.

5.9.2 Clean Sampling Techniques

Clean sampling techniques involve the use of certified clean containers for sample collection, consideration of the use of clean powder-free nitrile gloves, etc. during sample collection and handling. As discussed in Section 5.8, adoption of a clean sampling approach will minimize the chance of field contamination and questionable data results.

5.9.3 Field Instrument Calibration

Field instruments such as pH meters are to be calibrated prior to each monitoring event. Use calibration fluids from a documented source. For temperature-corrected pH meters, recommended practice is to use single-use buffer pouches that include lot numbers and expiration data. Calibrate the pH meters, following manufacturer’s instructions, with at least a 2-point calibration, using pH 4 and pH 7 buffer solutions. Record

the date, time, buffer type, lot number, expiration date, and meter readings before and after each calibration step for each buffer solution on the calibration section of the form in Attachment3 of this MIP.

Before use in a stormwater sample, rinse the pH probe with water to remove any buffer solution. Subsequently, read the pH of the sample, rinse the meter again to remove any sample fluids, and place the meter back in the pH 4 buffer pouch for use at the next sample location.

Check meter reading in pH 4 buffer pouch after sampling to verify no drift happened during field work. If reading differs significantly from nominal buffer value, recalibrate meter with fresh buffer solutions and repeat the pH measurements. Discard meter if no stable profile can be obtained.

5.9.4 Chain of Custody

The sample CoC is an important documentation step that tracks samples from collection through analysis to ensure the validity of the sample. Sample CoC procedures include the following:

- Proper labeling of samples;
- Use of CoC forms for all samples; and
- Prompt sample delivery to the analytical laboratory.

Analytical laboratories usually provide CoC forms to be filled out for sample containers. An example CoC is included in MIP Attachment 3 "Example Forms."

5.9.5 QA/QC Samples

QA/QC samples provide an indication of the accuracy and precision of the sample collection; sample handling; field measurements; and analytical laboratory methods. The following types of QA/QC may be conducted for this project for additional consistency with proper sampling protocols (i.e. beyond the normal QA/QC laboratories will undergo to maintain their analytical certifications):

☒ Field Duplicates at a frequency of 1 duplicate per monitoring station per season[2]
(Required for all sampling plans with field measurements or laboratory analysis)

☐ Equipment Blanks at a frequency of
(Only needed if equipment used to collect samples could add the pollutants to sample)

☐ Field Blanks at a frequency of 1 duplicate per monitoring station per season
(Only required if sampling method calls for field blanks)

☐ Travel Blanks at a frequency of
(Only required for sampling plans that include Volatile Organic Carbons (VOC) laboratory analysis)

[2] Sampling season is from July 1 through June 30.

5.9.5.1 Field Duplicates

Field duplicates provide verification of laboratory or field analysis and sample collection. Duplicate samples would be collected, handled, and analyzed using the same protocols as primary samples. The sample location where field duplicates are collected would be randomly selected from the discharge locations. Duplicate samples would be collected immediately after the primary sample has been collected. Duplicate samples must be collected in the same manner and as close in time as possible to the original sample.

5.9.5.2 Equipment Blanks

Equipment blanks provide verification that equipment has not introduced a pollutant into the sample. Equipment blanks are typically collected when:

- Reusable sampling equipment is used;
- Equipment that has been cleaned after use;
- Equipment that is not dedicated for surface water sampling is used; or
- Whenever a new lot of filters is used when sampling metals.

5.9.5.3 Field Blanks

Field blanks assess potential sample contamination levels that occur during field sampling activities, such as in dusty or smoky conditions. De-ionized water field blanks are taken to the field, transferred to the appropriate container, and treated the same as the corresponding sample type during the course of a sampling event.

5.9.5.4 Travel Blanks

Travel blanks assess the potential for cross-contamination of volatile constituents between sample containers or by ambient conditions during shipment from the field to the laboratory. De-ionized water blanks are taken along for the trip and held unopened in the same cooler with the VOC samples, when applicable.

5.9.6 Data Verification

After results are received from the analytical laboratory, APCI staff will verify the data to ensure that it is complete, accurate, and the appropriate QA/QC requirements were met, as described in Section 5.9.4. Data must be verified as soon as the data reports are received. Data verification will include:

- Check the CoC and laboratory reports.

  Make sure all requested analyses were performed and all samples are accounted for in the reports.

- Check laboratory reports to make sure hold times were met and that the reporting levels meet or are lower than the reporting levels agreed to in the contract.

- Check data for outlier values and follow up with the laboratory.

  Occasionally typographical errors, unit reporting errors, or incomplete results are reported and should be easily detected. These errors need to be identified, clarified, and corrected quickly by the laboratory. Especially note data that is an order of magnitude or more different than similar locations, or is inconsistent with previous data from the same location.

- Check laboratory QA/QC results.

  EPA establishes QA/QC checks and acceptable criteria for laboratory analyses. These data are typically reported along with the sample results provided by the lab in their lab report. Evaluate the reported QA/QC data to check for contamination (method, field, and equipment blanks), precision (laboratory matrix spike duplicates), and accuracy (matrix spikes and laboratory control samples). When QA/QC checks are outside acceptable ranges, the laboratory must flag the data, and usually provides an explanation of the potential impact to the sample results.

- Check the data set for outlier values and as needed, confirm results and re-analyze samples where appropriate.

  Sample re-analysis should only be undertaken when it appears that some part of the QA/QC resulted in a value out of the accepted range. Sample results may not be discounted unless the analytical laboratory identifies the required QA/QC criteria were not met and confirms this in writing.

Field data including pH measurements and visual observations must be verified as soon as the Visual Observation and Sampling Logs are received, typically at the end of the monitoring event. Field data verification will include:

- Check logs to make sure all required measurements were completed and appropriately documented;
- Check reported values that appear out of the typical range or inconsistent; *Follow-up immediately to identify potential reporting or equipment problems, if appropriate, recalibrate equipment after sampling;*
- Review field instrument calibration logs;
- Review observations noted on the sampling logs; and
- Review notations of any errors and actions taken to correct the equipment or recording errors.

5.10 RECORDS RETENTION

Records of stormwater monitoring information and copies of reports (including Annual Reports) must be retained for a period of at least five (5) years from date of submittal or longer if required by RWQCB.

Results of visual observations, field measurements, and laboratory analyses must be kept in the SWPPP along with CoCs, and other documentation related to the monitoring.

Records to be retained include:

- The date, place, and time of inspections, sampling, visual observations, and/or measurements, including precipitation;
- The individual(s) who performed the inspections, sampling, visual observation, and/or field measurements;
- The date and approximate time of field measurements and laboratory analyses;
- The individual(s) who performed the laboratory analyses;
- A summary of all analytical results, the method detection limits and reporting limits, and the analytical techniques or methods used;
- Weather reports;
- QA/QC records and results;
- Calibration records;
- Visual observation and sample collection exception records; and
- The records of any corrective actions and follow-up activities that resulted from analytical results, visual observations, or inspections.

MIP ATTACHMENT 1: WEATHER REPORTS

MIP ATTACHMENT 2: MONITORING RECORDS

MIP ATTACHMENT 3: EXAMPLE FORMS

Visual Observation Log – Monthly			
Date and Time of Inspection:		Report Date:	
Facility Name:US Coast Guard Sector San Francisco			
Weather			
Antecedent Conditions (last 48 hours):		Current Weather:	
NSWD Observations			
Were any authorized non-stormwater discharges observed?		Yes ☐	No ☐
Were any **unauthorized** non-stormwater discharges observed?		Yes ☐	No ☐
If yes to either, identify source:			
Outdoor Industrial Equipment and Storage Area Observations			
Complete Monthly BMP Inspection Report	Yes ☐ No ☐		
Drainage Area 1:	Were any deficiencies or any other potential source of industrial pollutants observed? Yes ☐ No ☐		
Drainage Area 2:	Were any deficiencies or any other potential source of industrial pollutants observed? Yes ☐ No ☐		
Drainage Area 3:	Were any deficiencies or any other potential source of industrial pollutants observed? Yes ☐ No ☐		
If yes to any, describe:			
Exception Documentation (explanation required if inspection could not be conducted).			
Inspector Information			
Inspector Name:	Inspector Title:		
Signature:	Date:		

Visual Observation Log – Sampling Events			
Date and Time of Inspection:		Report Date:	
Facility Name:US Coast Guard Sector San Francisco			
Weather			
Antecedent Conditions (last 48 hours):		Weather:	
Precipitation Total:		Predicted % chance of rain:	
Estimate storm beginning: _____ (date and time)	Estimate storm duration:_____ (hours)	Estimate time since last storm: _____ (days or hours)	Rain gauge reading:_____ (inches)
Sampling Event Observations			
Observations: If yes identify location and observe drainage area to identify probable cause			
Odors	Yes ☐ No ☐		
Floating material	Yes ☐ No ☐		
Suspended Material	Yes ☐ No ☐		
Sheen	Yes ☐ No ☐		
Discolorations	Yes ☐ No ☐		
Turbidity	Yes ☐ No ☐		
NSWD Observations			
Were any authorized non-stormwater discharges observed?		Yes ☐	No ☐
Were any **unauthorized** non-stormwater discharges observed?	Yes ☐	No ☐	
If yes to either, identify source			
Drainage Area Observations			
Drainage Area		**Deficiencies Noted**	

Exception Documentation (explanation required if inspection could not be conducted).	
Inspector Information	
Inspector Name:	Inspector Title:
Signature:	Date:

Sampling Log		
Facility Name:US Coast Guard Sector San Francisco	Date:	Time Start:
Sampler Name:		

Field Meter Calibration		
Meter Manufacturer	Meter Model #	Meter Serial #

Standard Buffer	**Control Number**	**Expiration Date**	**Date Opened**
pH Buffer 4.0			
pH Buffer 7.0			
pH Buffer 10.0			

pH Meter Calibration Record

Date	**Temperature at Calibration**	**Buffers Used for Calibration**			**Re-Check pH 7.0**	**Notes**	**Initials**
		pH 4.0	**pH 7.0**	**pH 10.0**			
						Indicate pH before calibration in applicable buffer column	
						Indicate pH after calibration in applicable buffer column	

Field pH Measurements

Discharge Location Identifier	pH	Time
Sample Location		
Sample Location		
Sample Location		
Sample Location		
Sample Location		
Sample Location		

Sampling Log - Continued		
Facility Name: US Coast Guard Sector San Francisco	Date:	Time Start:
Sampler Name:		
Sample Collection		
Discharge Location Identifier	Constituent	Time
Sample Location	O&G, TSS, Al, Cu, Fe, Pb, Zn	
Sample Location	O&G, TSS, Al, Cu, Fe, Pb, Zn	
Sample Location	O&G, TSS, Al, Cu, Fe, Pb, Zn	
Sample Location	O&G, TSS, Al, Cu, Fe, Pb, Zn	
Sample Location	O&G, TSS, Al, Cu, Fe, Pb, Zn	
Sample Location	O&G, TSS, Al, Cu, Fe, Pb, Zn	
Additional Sampling Notes:		
Time End:		

CHAIN-OF-CUSTODY **DATE:** **Lab ID:**

DESTINATION LAB: **ATTN:** : **ADDRESS:** **Office Phone:** **Cell Phone:**				REQUESTED ANALYSIS				Notes:
SAMPLED BY:								
Contact:								
Facility Name								
Client Sample ID	**Sample Date**	**Sample Time**	**Sample Matrix**	**Container #**	**Container Type**	**Container Pres.**		

SENDER COMMENTS:	**RELINQUISHED BY**	
	Signature:	
	Print:	
	Company:	
	Date:	TIME:

LABORATORY COMMENTS:	**RECEIVED BY**	
	Signature:	
	Print:	
	Company:	
	Date:	TIME:

MIP ATTACHMENT 4: OTHER REGULATORY DOCUMENTS

SECTION 6 REFERENCES

State Water Resources Control Board (2014). Order 2014-0057-DWQ, NPDES General Permit No. CAS000001: *National Pollutant Discharges Elimination System (NPDES) California General Permit for Storm Water Discharge Associated with Industrial Activities.* Available on-line at:http://www.waterboards.ca.gov/water_issues/programs/stormwater/industrial.shtml.

TetraTech (2013). *Stormwater Pollution Prevention Plan United States Coast Guard Unit Sector San Francisco, Yerba Buena Island.*

Permit Registration Documents included in this Appendix

Y/N	Permit Registration Document
	Notice of Intent
	Certification
	Copy of Annual Fee Receipt
	Site Map(s), see Appendix A

Trained Team Member Log

Stormwater Management Training Log and Documentation

Facility Name: US Coast Guard Sector San Francisco
WDID #: 2 38I012064

Stormwater Management Topic: (check as appropriate)

☐ Good Housekeeping
☐ Spill and Leak Prevention and Response
☐ Erosion and Sediment Controls
☐ Advanced BMPs
☐ Stormwater Sampling and Analysis
☐ Preventative Maintenance
☐ Material Handling and Waste Management
☐ Quality Assurance and Record Keeping
☐ Visual Observations

Specific Training Objective: _____

Location: _____ Date: _____

Instructor: _____ Telephone: _____

Course Length (hours): _____

Attendee Roster (Attach additional forms if necessary)

Name	Company	Phone

As needed, add proof of external training (e.g., course completion certificates, credentials for QISP).

Pollution Prevention Team

Name	Title	Phone Number	Responsibilities and Duties
Casper van Keppel, PE, QISP	Qualified Industrial Stormwater Practitioner, AECOM	(415) 264-9885	• Complete Level 1 and 2 ERA Evaluation • Prepare Level 1 ERA Report • Prepare Level 2 ERA Action Plan • Amend SWPPP, as needed • Provide training for pollution prevention team members
Daniel Kartes	Environmental Protection Specialist	415-399-7375	• Implementing, maintaining, and amending the plan at the intervals required in the plan • Assisting in the annual compliance inspection and providing the Non-Storm Water Certification for the facility • Implementing any action items identified during the inspection or at any time a non-compliance incident occurs • Performing wet/dry season observations and collects stormwater samples for laboratory analysis
Wenyuan Tang, PE	AECOM staff engineer	510-893-3600	
Hamza, Abdullatef	Environmental Protection Specialist	415-399-7375	• Keeping the facility apprised of regulatory changes that require revisions of the Plan • Helping implement new requirements • Assisting in discharge reporting • Obtaining approvals for disposal of spill clean-up materials • Assisting in developing training materials

Duly Authorized Representatives

Name	Title	Phone Number
Hamza, Abdullatef	Environmental Protection Specialist	415-399-7375

Training of USCG Sampling Personnel

Name	Training
Samples will be collected by AECOM or future environmental consultants and /or USCG facility staff	HAZWOPER 40-hr trained, Remediation site work experience for environmental consultants and stormwater sampling s and awareness training for USCG facility staff.

Authorization of Duly Authorized Representatives

Facility Name: US Coast Guard Sector San Francisco
WDID #: 2 38I012064

Name of Personnel	Project Role	Company	Signature	Date
Mr. Abdullatef Hamza	DAR	USCG		

_____ _____
LRP's Signature Date

___CAPT Marie Byrd_____ ____415-399-3410_____
LRP Name and Title Telephone Number

Identification of QISP

Facility Name: US Coast Guard Sector San Francisco
WDID #: 2 38I012064

The following are QISPs associated with this project

Name of Personnel(1)	Company	Date
Casper van Keppel, PE, QISP	AECOM Technical Services, Inc.	December 29, 2016

(1) If additional QISPs are required, add additional lines and include information here

SWPPP Amendment No. Revision 1

Project Name: Update of SWPPP for compliance with 2014 IGP and to include latest NAL Exceedance Level status.

Project Number: AECOM Technical Services, Inc.

Legally Responsible Person's Certification of the Stormwater Pollution Prevention Plan Amendment

"This Stormwater Pollution Prevention Plan and attachments were prepared under my direction to meet the requirements of the California Industrial General Permit (SWRCB Order No. 2014-0057-DWQ)."

LRP's Signature	Date
LRP Name	LRP Title
Title and Affiliation	Telephone
Address	Email

SWPPP Amendment No. Revision 2

Project Name: Update of SWPPP for changes in industrial activities and NAL Exceedance Level status.

Project Number: AECOM Technical Services, Inc. - 60596606

Legally Responsible Person's Certification of the Stormwater Pollution Prevention Plan Amendment

"This Stormwater Pollution Prevention Plan and attachments were prepared under my direction to meet the requirements of the California Industrial General Permit (SWRCB Order No. 2014-0057-DWQ)."

LRP's Signature	Date
LRP Name	LRP Title
Title and Affiliation	Telephone
Address	Email

Table H.1
BMP Implementation Log

Industrial Activity/Material and Location	BMP Description	Implementation Frequency	Implementation Description or Fact Sheet Reference	Person Responsible for Implementing BMP

MONTHLY BMP INSPECTION REPORT

Date and Time of Inspection:			Date Report Written:
Part I. General Information			
Site Information			
Facility Name: US Coast Guard Sector San Francisco			
Facility Address:1 Yerba Buena Island, San Francisco, CA			
Photos Taken: (Circle one)	Yes	No	Photo Reference IDs:
Weather			
Estimate storm beginning: (date and time)			Estimate storm duration: (hours)
Estimate time since last runoff from any drainage area: (days or hours)			Rain gauge reading and location: (in)
Is a "Qualifying Storm Event" predicted or did one occur (i.e., discharge from site preceded by 48-hrs without discharge)? (Y/N) If yes, summarize forecast:			
Exception Documentation (explanation required if inspection could not be conducted).			
Inspector Information			
Inspector Name:			Inspector Title:
Signature:			Date:

Part II. BMP Observations. Describe deficiencies in Part III.			
Minimum BMPs (List and Inspect all BMPs Implemented)	Failures or other Deficiencies (yes, no, N/A)	Action Required (yes/no)	Action Implemented (Date)
Good Housekeeping			
Preventative Maintenance			
Spill and Leak Prevention and Response			
Materials Handling and Waste Management			

Part II. BMP Observations Continued. Describe deficiencies in Part III.			
Advanced BMPs (List and Inspect all BMPs Implemented)	Adequately designed, implemented and effective (yes, no, N/A)	Action Required (yes/no)	Action Implemented (Date)
Exposure Minimization BMPs			
Stormwater Containment and Discharge Reduction BMPs			
Treatment Control BMPs			
Other Advanced BMPs			

Part III. Descriptions of BMP Deficiencies		
Deficiency	**Repairs Implemented: Note - Repairs must be completed as soon as possible.**	
	Repaired (Y/N)	**Corrective Action Implemented**
1.		
2.		
3.		
4.		

Part IV. Additional Corrective Actions Required. Identify additional corrective actions not included with BMP Deficiencies (Part III) above. Identify BMPs that need more frequent inspection. Note if SWPPP change is required.	
Required Actions	**Implementation Date**

Available on-line at

http://swrcb.ca.gov/water_issues/programs/stormwater/industrial.shtml#igp_2014-0057-dwq