



## **4 SWMP CONTROL MEASURES**

### **4.1 PROGRAM MANAGEMENT**

#### **4.1.1 GENERAL REQUIREMENTS**

The Elk Grove Unified School District will designate a team of staff to oversee and manage the development and implementation of the District's Storm Water Management Program.

#### **4.1.2 PERMIT REQUIREMENT**

The General Small MS4 Permit does not include specific requirements for program management. The District has elected to include the Program Management control measure to set forth the District's intentions to effectively manage the development and implementation of the Storm Water Management Program.

#### **4.1.3 RESPONSIBLE INDIVIDUAL**

Marlon Robbins – SWMP Manager – District Risk Manager  
Vanessa Ham – Alternate – Loss Control Specialist  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

#### **4.1.4 COMMITMENTS**

The Elk Grove Unified School District commits to the following items as part of this control measure:

- A. Naming, and renaming when necessary, a District Storm Water Program Manager to be responsible for the coordination, development, and implementation of the District's Storm Water Management Program. The District Storm Water Program Manager will also serve as the District's liaison with the California Regional Water Quality Control Board Central Valley Region. The District Storm Water Program Manager will be responsible for coordination of actions and responses to municipal enforcement actions directed to the District. The CVRWQCB and municipal MS4 permittees within the District's boundaries will be provided with the Program Manager's contact information and notified that the Program Manager is the person to contact regarding enforcement actions related to District facilities or activities.
- B. Designating, and redesignating when necessary, members of the District's Storm Water Program Management Team. At a minimum, the Storm Water Management Team will include the individuals designated as responsible for one or more of the control measures set forth in this Storm Water Management Program.
- C. Conducting Storm Water Management Team meetings as needed to effectively manage the Storm Water Management Program.
- D. Meeting annually with managers of City and County storm water management programs that underlie the District's boundaries to exchange program information

**Elk Grove Unified School District**  
**Storm Water Management Program**

---

- D. Meet a minimum of once per year with the SSQP or representatives MS4 permittees within the District'

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of this control measure. Additional information on program assessment is included in Section 6.

#### **4.1.7 IMPLEMENTATION SCHEDULE**

The implementation schedule for this control measure is included in Section 5.

### **4.2 PUBLIC EDUCATION**

#### **4.2.1 GENERAL REQUIREMENT**

The Elk Grove Unified School District must develop and implement a program to educate students and staff about the importance of the storm water program and the role of students and staff in the program.

#### **4.2.2 PERMIT REQUIREMENT**

The General Small MS4 Permit Section D.2.a sets forth the following requirements for the Public Education control measure.

**a. *Public Education and Outreach on Storm Water Impacts***

*The Permittee must implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff. For non-traditional Permittees, the employee/user population may serve as "the public" to target for outreach and involvement.*

*Non-traditional Small MS4s that discharge into medium and large MS4 may integrate public education and outreach program with the existing MS4 public education and outreach programs.*

#### **4.2.3 RESPONSIBLE INDIVIDUAL**

Ray Pieterston – Program Specialist  
Curriculum and Professional Learning  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

#### **4.2.4 COMMITMENTS**

The Elk Grove Unified School District commits to the following items as part of this control measure:

- A. Identifying opportunities to integrate storm water management education into the elementary school curriculum.

**Elk Grove Unified School District**  
**Storm Water Management Program**

---

- E. Conduct a storm drain stencil design contest.
- F. Develop and implement a student organization fundraiser policy that addresses pollution prevention and requires compliance with the District SWMP, local MS4 codes and programs, and State and Federal regulations.
- G. Develop guidance to educate student organizations car wash organizers on how to prevent the discharge of pollutants during car wash fundraisers.
- H. Identify one opportunity each year to educate staff about the importance of storm water management.
- I. Develop or adopt resource materials to educate staff about the importance of storm water management.
- J. Implement staff education about the importance of storm water management. Reach at least 75 percent of all staff with at least one storm water management educational message each year.

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of this control measure. Additional information on program assessment is included in Section 6.

#### **4.2.7 IMPLEMENTATION SCHEDULE**

The implementation schedule for this control measure is included in Section 5.

### **4.3 PUBLIC INVOLVEMENT/PARTICIPATION**

#### **4.3.1 GENERAL REQUIREMENT**

The Elk Grove Unified School District must comply with State and local public notice requirements when implementing a public involvement/participation program.

#### **4.3.2 PERMIT REQUIREMENT**

The General Small MS4 Permit Section D.2.b sets forth the following requirements for the Public Participation control measure.

***b. Public Involvement/Participation***

*The Permittee must at a minimum comply with State and local public notice requirements when implementing a public involvement/participation program.*

#### **4.3.3 RESPONSIBLE INDIVIDUAL**

Elizabeth Graswich – Communications  
Torrey Johnson – Communications  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

#### **4.3.4 COMMITMENTS**

The Elk Grove Unified School District commits to the following items as part of this control measure:

- A. Posting a notice on the District's web site notifying the public that the Storm Water Management Program is available for review.

**Elk Grove Unified School District**  
**Storm Water Management Program**

---

- 6) *Address the following categories of non-storm water discharges or flows (i.e., authorized non-storm water discharges) only where they are identified as significant contributors of pollutants to the Small MS4:*
1. *water line flushing;*
  2. *landscape irrigation;*
  3. *diverted stream flows;*
  4. *rising ground waters;*
  5. *uncontaminated ground water infiltration (as defined at 40 CFR §35.2005(20)) to separate storm sewers;*
  6. *uncontaminated pumped ground water;*
  7. *discharges from potable water sources;*
  8. *foundation drains;*
  9. *air conditioning condensation;*
  10. *irrigation water;*
  11. *springs;*
  12. *water from crawl space pumps;*
  13. *footing drains;*
  14. *lawn watering;*
  15. *individual residential car washing;*
  16. *flows from riparian habitats and wetlands; and*
  17. *dechlorinated swimming pool discharges.*

*Discharges or flows from fire fighting activities are excluded from the effective prohibition against non-storm water and need only be addressed where they are identified as significant sources of pollutants to waters of the U.S.*

*If a RWQCB Executive Officer determines that any individual or class of non-storm water discharge(s) listed above may be a significant source of pollutants to waters of the U.S. or physically interconnected MS4, or poses a threat to water quality standards (beneficial uses), the RWQCB Executive Officer may require the appropriate Permittee(s) to monitor and submit a report and to implement BMPs on the discharge.*

#### **4.4.3 RESPONSIBLE INDIVIDUAL**

Michael Allen – Director of Maintenance and Grounds  
Maintenance and Grounds  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

#### **4.4.4 COMMITMENTS**

The Elk Grove Unified School District commits to the following items as part of this control measure:

- A. Completing a storm drain system inventory at each District facility. The storm drain system inventory will include a map showing the location where the

**Elk Grove Unified School District**  
**Storm Water Management Program**

---

Permit. The District will approach this program in two ways: management of the District's construction site storm water program will be covered by this Storm Water Management Program while construction site storm water discharges will continue to be covered by the General Permit. A copy of the General Construction Permit is included in Appendix F.

The General Small MS4 Permit Section D.2.d sets forth the following requirements for the Construction Site Storm Water Management control measure.

**d. Construction Site Storm Water Runoff Control**

*The Permittee must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the Small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include the development and implementation of, at a minimum:*

- 1) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions, or other effective mechanisms, to ensure compliance, to the extent allowable under State, or local law;*
- 2) Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;*
- 3) Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;*
- 4) Procedures for site plan review which incorporate consideration of potential water quality impacts;*
- 5) Procedures for receipt and consideration of information submitted by the public; and*
- 6) Procedures for site inspection and enforcement of control measures.*

**4.5.3 RESPONSIBLE INDIVIDUAL**

Lee Leavelle – Senior Construction Manager  
Facilities and Planning  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

**4.5.4 COMMITMENTS**

The Elk Grove Unified School District commits to the following items as part of this control measure:

- A. Updating the District's construction specifications to include detailed specifications for the preparation and implementation of a Storm Water Pollution Prevention Plan by the construction contractor at all sites otherwise subject to the General Construction Permit. At a minimum, the specifications will require

## **4.6 POST CONSTRUCTION STORM WATER MANAGEMENT**

### **4.6.1 GENERAL REQUIREMENT**

The Elk Grove Unified School District must develop and implement a program to incorporate BMPs that protect water quality and control runoff into new facilities and existing facilities that undergo significant redevelopment.

### **4.6.2 PERMIT REQUIREMENT**

The General Small MS4 Permit Section D.2.e sets forth the following requirements for the Post Construction Storm Water Management control measure.

*e. **Post-Construction Storm Water Management in New Development and Redevelopment***

*The Permittee must:*

- 1) Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the Small MS4 by ensuring that controls are in place that would prevent or minimize water quality impacts;*
- 2) Develop and implement strategies, which include a combination of structural and/or non-structural BMPs appropriate for your community;*
- 3) Use an ordinance or other regulatory mechanism to address postconstruction runoff from new development and redevelopment projects to the extent allowable under State or local law For those Small MS4s described in Supplemental Provision E below, the requirements must at least include the design standards contained in Attachment 4 of this General Permit or a functionally equivalent program that is acceptable to the appropriate RWQCB; and*
- 4) Ensure adequate long-term operation and maintenance of BMPs.*

*The General Permit does not require redesign of K-12 school or community college facilities that have been submitted to the Department of General Services, Division of the State Architect before adoption of the permit, and which receive final approval from the State Allocation Board or the Public Works Board, as appropriate, on or before December 31, 2004.*

### **4.6.3 RESPONSIBLE INDIVIDUALS**

**Facility Design**

Lee Leavelle – Senior Construction Manager  
Facilities and Planning  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

**Elk Grove Unified School District**  
**Storm Water Management Program**

---

---

**Facility Operation and Maintenance**

Michael Allen – Director of Maintenance and Grounds  
Maintenance and Grounds  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

**4.6.4 COMMITMENTS**

The Elk Grove Unified School District commits to the following items as part of this control measure:

- A. Developing a program to prevent or minimize water quality impacts associated with new facilities or facilities that undergo significant redevelopment by addressing storm water runoff and incorporating BMPs. The program will address projects that disturb one acre or more, or less than one acre if part of a larger common plan of development. Facilities to be addressed include schools and ancillary facilities. The program will include strategies such incorporation of site design BMPs, source control BMPs, and treatment control BMPs.
- B. Implementing the program to prevent or minimize water quality impacts associated by new facilities or facilities that undergo significant redevelopment by addressing storm water runoff and incorporating BMPs.
- C. Developing a plan for operation and maintenance of post-construction BMPs.
- D. Implementing the plan for operation and maintenance of post-construction BMPs.

**4.6.5 DEVELOPMENT GUIDANCE**

Post-construction storm water management requirements are relatively new to Phase I MS4 storm water programs, and therefore there are substantially fewer guidance documents available to assist Phase II communities who are being required to ramp this program up over the five year term of the General Small MS4 Permit. Because of the potentially high cost implications associated with this program (Regional Board staff have quoted up-front costs of 3 to 5% of construction costs), this program requires extra careful development. Fortunately, several organizations in California have developed guidance documents specific to new development. First, there is the Bay Area Storm Water Management Agencies Association (BASMAA) who published the series of documents referred to as “Start at the Source.” The original Start at the Source document and the two follow-on companion documents provide excellent guidance on integrating storm water quality controls into development projects. The California Storm Water Quality Association’s new document, California Storm Water Best Management Practice Handbook – New Development and Redevelopment (CASQA, 2003) provides a range of guidance for new development, with many of the concepts built around the concepts set forth in Start at the Source. The BASMAA and CASQA documents are essential references for the post-construction storm water management program.

Appendix M provides resource materials for assisting in the development of this control measure.

**Elk Grove Unified School District**  
**Storm Water Management Program**

---

- 2) *Using training materials that are available from U.S. EPA, the State, or other organizations, the program must include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet building maintenance, new construction and land disturbances, and storm water system maintenance.*

### **4.7.3 RESPONSIBLE INDIVIDUALS**

#### **Custodial Services**

Linda Lopez – Manager of Custodial Services  
Custodial Services  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

#### **Operations, Maintenance, and Grounds**

Michael Allen – Director of Maintenance and Grounds  
Maintenance and Grounds  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

#### **Transportation**

Jill Gayaldo – Director of Transportation  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

### **4.7.4 COMMITMENTS**

The Elk Grove Unified School District commits to the following items as part of this control measure:

- A. Developing guidance for pollution prevention and good housekeeping during operation and maintenance activities at District schools and ancillary facilities. At a minimum, the guidance will cover dumpster area management, can washing, pressure washing, and non-storm water discharges.
- B. Developing a program to train District operation and maintenance staff on implementing the guidance for pollution prevention and good housekeeping during operation and maintenance activities at District schools and ancillary facilities.
- C. Training District operation and maintenance staff annually on how to implement pollution prevention and good housekeeping during operation and maintenance District schools and ancillary facilities.
- D. Implementing pollution prevention and good housekeeping during operation and maintenance activities.
- E. Performing spot checks at schools and ancillary facilities to verify that pollution prevention and good housekeeping practices are being appropriately implemented.

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of the control measure. Additional information on program assessment is included in Section 6.

#### **4.7.7 IMPLEMENTATION SCHEDULE**

The implementation schedule for this control measure is included in Section 5.

### **4.8 TRANSPORTATION FACILITY STORM WATER MANAGEMENT**

#### **4.8.1 GENERAL REQUIREMENT**

The Elk Grove Unified School District operates transportation facilities that are subject to the General Industrial Permit. Since a storm water discharge can only be covered by one NPDES permit, the District's Storm Water Management Program specifically excludes coverage of any discharge which is covered by the General Industrial Permit. A copy of the General Industrial Permit is included in Appendix G.

The Elk Grove Unified School District will develop and implement a program to ensure that its facilities subject to the General Industrial Permit comply with said permit. The program will include procedures to maintain or to gain coverage under the General Industrial Permit when required, and inspections to verify compliance. At this time, the District's transportation facilities at the Student Support Center are the only facilities known to be covered by the General Industrial Permit: District facilities not covered by the General Industrial Permit will be subject to the provisions of this Storm Water Management Program, including Good Housekeeping measures and other applicable program elements.

#### **4.8.2 PERMIT REQUIREMENT**

The General Small MS4 Permit does not include specific requirements for an industrial storm water management program. Therefore, the District proposes to include all District facilities not subject to the General Industrial Permit under the provisions included in this Storm Water Management Program. The Storm Water Management Program will include the management of compliance efforts at District facilities subject to the General Industrial Permit, but the discharges from said facilities will continue to be covered under the General Industrial Permit. A copy of the General Industrial Permit is included in Appendix G.

#### **4.8.3 RESPONSIBLE INDIVIDUAL**

Jill Gayaldo – Director of Transportation  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

## **5 IMPLEMENTATION SCHEDULE**

The schedule can be viewed by printing the schedule file.

**Appendix C – Waste Discharge Identification Number**

**Waste Discharge Identification Number Transmittal  
Letter from the State**

## **Appendix I - Public Education Resource Materials**

The resource materials included in this appendix are intended to serve as guidance for the development of BMPs as part of the Elk Grove Unified School District Storm Water Management Program. The resource materials are general in nature and are not specific to the District, and therefore cannot be interpreted to convey any specific commitment or content of the BMPs that will ultimately be developed and included in the Elk Grove Unified School District Storm Water Management Program. All commitments being made by the Elk Grove Unified School District with respect to the Storm Water Management Program are set forth in Sections 4-6 of the Storm Water Management Program.

### **Resources:**

1. Model Urban Runoff Program (City of Monterey, et al., 2002), Appendix 4D Educational Tools and Resources for Public Education Program.  
[http://www.waterboards.ca.gov/stormwtr/docs/murp\\_appendix4d.pdf](http://www.waterboards.ca.gov/stormwtr/docs/murp_appendix4d.pdf)
2. School Oriented Fact Sheets from the Corona-Norco Unified School District Storm Water Management Program developed by AEI-CASC Engineering.
3. The American Ocean Campaign's web site has a number of educational items and curriculum aids developed specifically for school aged children (extensive resource, copies not included in this appendix).  
<http://www.americanocéans.org/runoff/epa-bro1.htm#kids>  
<http://www.americanocéans.org/runoff/epa-curr.htm>
4. The City of Sacramento Storm Water Program provides resources for teachers (extensive resource, copies not included in this appendix).  
<http://www.sacstormwater.org/fun/teachers.htm>
5. The California Stormwater Quality Association (CASQA) web site provides extensive resource materials for use in education programs.  
<http://www.casqa.org/resourcelibrary/>