



SECTION 2

PERFORMANCE STANDARD REVISIONS

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Background

The Santa Clara Valley Urban Runoff Pollution Prevention Program (Program) developed model Performance Standards (PSs) in 1996. The model PSs were accepted by the Regional Board in June 1997. Each Co-permittee adopted the model PSs or tailored them to their local community characteristics and conditions. The PSs were incorporated into the Program's September 1, 1997 *Urban Runoff Management Plan (URMP)*, updated URMP submitted as part of the permit re-application (Finding 6) and the Co-permittees' local URMPs which is currently part of the NPDES permit (Provision C.2).

The URMP also contains the Program's commitment to a process of continuous improvement. One component of this process is to review an existing PS, or create a new PS, each year. Decisions as to which PS will be created or revised in a given year are made based on requirements in the Program's NPDES permit, comments by Regional Board staff on Annual Reports, continuous improvement items identified as part of annual performance reviews, Program priorities and available Program resources.

New Development - Planning Procedures

To be consistent with the requirements of Permit Provision C.3., the Program revised the 1997 model *Planning Procedures Performance Standard (PPPS)*. Provision C.3.k. specifically requires that the Program submit a model enhanced performance standard for source control measures in new and redevelopment projects by March 1, 2003. It made sense to Program staff and the Program's C.3. Permit Oversight (C3PO) AHTG to combine the source control measures requirements with the PPPS revisions; and include the *Draft Model List of Source Control Measures* (submitted to the Regional Board on September 15, 2002, per Provision C.3.k. and the C.3 Table 1) as an attachment to the PPPS. The draft revised PPPS went through several rounds of review (by the C3PO AHTG) and was approved by the AHTG on January 27, 2003 and the Management Committee on February 20, 2003. The revised PPPS was submitted to the Regional Board in the Program's *FY 03-04 Draft Work Plan* on February 28, 2003.

Regional Board staff provided comments on the revised PPPS by electronic mail on June 10, 2003 and October 22, 2003. These comments and additional revisions were discussed with the C3PO AHTG. The major changes made to the PPPS as a result of these discussions included: 1) updating the Group 1 project definition to match the definition in the Program's proposed Alternative Group 2 Project Definition, approved by the Regional Board on October 15, 2003 (see Section 7); 2) adding language requested by Regional Board staff to encourage all projects to incorporate source control and site design measures (regardless of size); and 3) adding language requested by the Santa Clara County Vector Control District staff to include in the BMP section design considerations which minimize production of mosquito habitat. These final revisions were approved by the C3PO AHTG on November 17, 2003 and Management Committee on December 18, 2003. The final revised PPPS were formally transmitted to the Regional Board on January 26, 2004, and are also provided in Attachment 2-1 of this Work Plan.

Enhanced Annual Reporting Requirements- Industrial/Commercial Discharger Control Enhanced Annual Reporting Requirements- Illicit Connection/Illegal Dumping Elimination

In accordance with the Regional Board's letter, *Review of Program's Draft FY 2003-04 Work Plan* dated June 24, 2003, the Program informed the Co-permittees (see FY 02-03 Annual

Report Preparation Guidance dated June 18, 2003) that each Co-permittee should independently evaluate their individual IND and IC/ID inspection and utilize the results of the analysis to set inspection priorities and gauge program effectiveness. Within the FY 02-03 Annual Report, Co-permittees provided an effectiveness evaluation or analysis of their IND and ICID programs and/or data. This step was performed to address the Regional Board's concerns regarding IND reporting procedures.

To demonstrate consistency and compliance (on a Program-wide basis) with the strategy provided in the Program's technical memoranda regarding IND and IC/ID reporting (dated September 7, 2001) and the approved MC approach, Program staff will continue constructing IND and IC/ID summary tables using individual Co-permittee data. The summary tables are double checked with the Co-permittees. The overall goal of the effort has been to capture the full extent and the results of the Co-permittees efforts in a consistent format and on a Program-wide basis. Overall, this effort has been very successful.

The Program plans to develop model language for updating the IND and ICID performance standards to incorporate the new reporting procedures and the results of the Co-permittee evaluations. Due to resource and priority changes and the Co-permittee's focus on higher priority tasks in FY 03-04, this task will be performed in FY 04-05. The Program and Co-permittees will continue implementing IND and ICID reporting procedures consistent with the Program's technical memoranda.

Future Efforts- FY 04-05 Activities

Priorities for recent efforts to revise or create new performance standards have been driven by the requirements in the Program's reissued NPDES permit and/or continuous improvement tasks. All new or revised PS required by the permit were recently completed. Future efforts to revise or update existing PS will be identified through the process of continuous improvement (see Section 1) until the next permit re-issuance.

The Water Utility Operation and Maintenance Performance Standard has been identified as the next performance standard needing a major revision. Issues which include changes in methods of disinfection of potable water supplies and the appropriate BMPs for discharges of these waters to storm drains will be addressed. A work group with significant participation from SCVWD and other Co-permittees with water utilities will be formed for this purpose. Due to the Program's focus on higher priority tasks, this task will be performed in FY 04-05.

A list of performance standard-related tasks and a schedule for completion is provided below:

Performance Standard	Action	Due Date
Industrial Commercial Discharger Control Program – Enhanced Annual Reporting Requirements	Update existing PS	Draft December 1, 2004 ¹ Final March 1, 2005
Illicit Connection/Illegal Dumping Elimination -- Enhanced Annual Reporting Requirements	Update existing PS	Draft December 1, 2004 ¹ Final March 1, 2005
Water Utility Operation and Maintenance	Update existing PS	Draft March 2005 Final June 2005

¹ The Enhanced Annual Reporting Requirements for IND and ICID were submitted to the Regional Board on September 15, 2001 as required by Permit Provisions C.6.a.i. and C.6.a.ii., and have been successfully implemented by the Program and Co-permittees. This task will update the existing IND and ICID PS to reflect these enhanced reporting requirements.