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Alameda County Flood
Control and Water
Conservation District

Zone 7 Water Agency

Alameda Countywide Clean Water Program

Fiscal Year 2023/24 Annual Report to the San Francisco Bay Regional Quality Control Board

August 28, 2024

Protecting Alameda County Creeks, Wetlands & the Bay

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List of Acronyms and Abbreviations

ACCWP	Alameda Countywide Clean Water Program
AGOL	ArcGIS Online
BAHM	Bay Area Hydrology Model
Alameda Permittees	Cities of Alameda, Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Newark, Oakland, Piedmont, Pleasanton, San Leandro, and Union City; and the County of Alameda, the Alameda County Flood Control and Water Conservation District (District), and the Zone 7 Water Agency
BAMSC	Bay Area Municipal Stormwater Collaborative
Basin Plan	Water Quality Control Plan for the San Francisco Bay Basin
BMP	Best Management Practice
CASQA	California Stormwater Quality Association
CCCWP	Contra Costa Clean Water Program
CEDEN	California Environmental Data Exchange Network
CMP	Control Measure Plan
DA	District Attorney
District	Alameda County Flood Control and Water Conservation District
DPR	Department of Pesticide Regulation
EC	Emerging Contaminants
EO	Executive Officer
EPA	U.S. Environmental Protection Agency
FY	Fiscal Year (July 1 through June 30)
GI	Green Infrastructure
GIS	Geographic Information System
GSI	Green Stormwater Infrastructure
HM	Hydromodification Management
HUD	Housing and Urban Development
IIDC	Industrial and Illicit Discharge Control
IMR	Integrated Monitoring Report
IPM	Integrated Pest Management

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LARPD	Livermore Area Recreation and Parks Department
LID	Low Impact Development
MPC	Monitoring and Pollutants of Concern
MRP	Municipal Regional Permit
MRP 1	Municipal Regional Permit adopted in 2009
MRP 2	Municipal Regional Permit reissued in 2015
MRP 3	Municipal Regional Permit reissued in 2022
MS4	Municipal Separate Storm Sewer System
NDS	New Development Subcommittee
NPDES	National Pollutant Discharge Elimination System
OFEE	Oil-Filled Electrical Equipment
OHCC	Office of Homeless Care and Coordination
O&M	Operation and Maintenance
OVTA	On-land Visual Trash Assessment
OWOW	Our Water Our World
PAH	Polycyclic Aromatic Hydrocarbons
PCBs	Polychlorinated Biphenyls
Permit	Stormwater Discharge Permit
PIT	Point-In-Time
PLDA	Private Land Drainage Areas
POC	Pollutant of Concern
ppm	Parts per million
Program	Alameda Countywide Clean Water Program
QAPP	Quality Assurance Project Plan
RAA	Reasonable Assurance Analysis
RMC	Regional Monitoring Coalition
RMP	Regional Monitoring Program
RWL	Receiving Water Limitation
SCVURPPP	Santa Clara Valley Urban Runoff Pollution Prevention Program

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SFEI	San Francisco Estuary Institute
SIC	Standard Industrial Classification
SOP	Standard Operating Procedure
SWAMP	Surface Water Ambient Monitoring Program
TAG	Technical Advisory Group
TMDL	Total Maximum Daily Load
UCMR	Urban Creeks Monitoring Report
Water Board	San Francisco Bay Regional Water Quality Control Board
WOW Project	Watching Our Watersheds – Improving Trash Monitoring Methods and Pollution Prevention Strategies through Regional Partnerships in the Bay Area
WQIF	Water Quality Improvement Fund
WY	Water Year

Preface

Provision C.22 of the San Francisco Bay Regional Water Quality Control Board's (Water Board's) Municipal Regional Stormwater Permit (MRP) (Order No. R2-2022-0018, as amended, NPDES No. CAS612008) requires the Permittees covered by the MRP to submit Annual Reports by September 30 of each year that document the implementation of MRP requirements during the previous Fiscal Year (FY, July 1 through June 30). The MRP recognizes that the County of Alameda, the 14 cities within the County, the Alameda County Flood Control and Water Conservation District (District), and the Zone 7 Water Agency (Alameda Permittees) have joined together to form the Alameda Countywide Clean Water Program (ACCWP or Program). Each Alameda Permittee is submitting a separate Annual Report using the Annual Report format approved by the Water Board Executive Officer. Those Alameda Permittee reports describe the activities conducted by each of the Permittees during the previous FY. This Program Annual Report describes the activities that were conducted by the Program, the Bay Area Municipal Stormwater Collaborative (BAMSC), and the California Stormwater Quality Association (CASQA) on behalf of the Alameda Permittees during the previous FY. This report is referenced in and incorporated by reference into the Alameda Permittees' Annual Reports.

Introduction

Background

The Alameda Countywide Clean Water Program (ACCWP or Program) is a consortium comprising the cities of Alameda, Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Newark, Oakland, Piedmont, Pleasanton, San Leandro, and Union City; the County of Alameda; the Alameda County Flood Control and Water Conservation District (District); and the Zone 7 Water Agency (Member Agencies). The Program was established in 1991 through a Memorandum of Agreement in response to the San Francisco Bay Regional Water Quality Control Board's (Water Board's) issuance of a National Pollutant Discharge Elimination System (NPDES) stormwater discharge permit (Permit) to the Member Agencies. The Program allows the Member Agencies to work together to more efficiently comply with many of the Permit requirements. The Program also works collaboratively with other jurisdictions in the Bay Area through the Bay Area Municipal Stormwater Collaborative (BAMSC), and throughout the State through the California Stormwater Quality Association (CASQA).

For the first several permit cycles, the Water Board issued permits on a county-by-county basis. In 2009, the Water Board issued one permit to all the jurisdictions within the more urbanized counties in the Bay Area (Alameda, Contra Costa, San Mateo, Santa Clara, and Solano). This permit was referred to as the Municipal Regional Stormwater Permit or MRP 1. The MRP was subsequently reissued on November 19, 2015 (MRP 2) and on May 22, 2022 (MRP 3). MRP 3 was amended on October 11, 2023. The effective start date of MRP 3 was July 1, 2022. This Annual Report covers the FY from July 1, 2023 to June 30, 2024 and is the second Annual Report under MRP 3.

Organization of the Report

This countywide Annual Report only addresses the MRP 3 provisions applicable to Alameda County and, as such, does not include Provisions C.14, C.16, C.18, and C.19. This report is organized in order of the major MRP provisions, as listed below. In FY 2023/24 there are no countywide activities relevant to C.1 or C.13, and they are not included in this report.

- C.2. Municipal Operations
- C.3. New Development and Redevelopment
- C.4. Industrial and Commercial Site Controls
- C.5. Illicit Discharge Detection and Elimination
- C.6. Construction Site Control
- C.7. Public Information and Outreach
- C.8. Water Quality Monitoring
- C.9. Pesticides Toxicity Control
- C.10. Trash Load Reduction
- C.11. Mercury Controls
- C.12. PCBs Controls
- C.15. Exempted and Conditionally Exempted Discharges
- C.17. Discharges Associated with Unsheltered Homeless Populations
- C.20. Cost Reporting
- C.21. Asset Management

Within each section, the requirements being reported on are summarized, along with a description of Program, BAMSC, or CASQA activities conducted to comply with the Permit requirement.

Highlights of Significant FY 2023/24 Accomplishments



HELPING CONSUMERS FIND LESS-TOXIC PRODUCTS
FOR USE IN THEIR HOMES AND GARDENS

Figure 1: Our Water Our World Logo And Slogan

Our Water Our World

Our Water Our World (OWOW) is a highly successful point-of-purchase outreach campaign promoting the use of less-toxic pest control methods. During FY 2023/24, the OWOW program continued partnering with 34 retailers throughout Alameda. This total includes nine Home Depot Stores. A

total of 17 training events were conducted, and 151 employees received the OWOW training. In addition, 10 in-person public outreach events and two online webinars were held, reaching a total of 395 attendees. OWOW Mentorship program participants at one of the Home Depots are shown in Figure 2.



Figure 2: OWOW Mentor Program Participants At Home Depot

Kids for the Bay

Kids for the Bay ran the “Storm Drain Rangers” program in 14 classrooms at six elementary schools, where they conducted cleanups, litter audits, assemblies, and five classroom lessons on storm drains, litter, and water pollution. In total, they collected 3,601 pieces and 250 gallons of trash. Environmental stewardship activities totaled 858 hours.

AGOL Tools Training for Tracking Maintenance and Inspections

This year the Program provided a training on the merged ArcGIS Online (AGOL) C.3 and C.10 inspection application. The purpose of this virtual training was to introduce the new application and provide an overview of how to access each type of field inspection conducted using AGOL field inspection tools. The training was held online and attended by 28 Members. It provided an overview of the AGOL Field Maps

applications and presented a new feature for field maps that consolidates the Trash Capture Device Inspections, C.3 Facility Inspections, and PLDA Assessments into one app. The meeting recording is available to Members via the Program's Vimeo.

C.8 Water Quality Monitoring

The Program coordinated with the BAMSC Trash Monitoring Workgroup to address Water Board comments on the Regional Trash Outfall Monitoring Plan and QAPP reports. The *BAMSC Regional Trash Outfall Monitoring Plan, Version 2.0* and the *BAMSC Regional Trash Outfall Monitoring QAPP, Version 2.0* were submitted to the Water Board on July 29, 2024.

The Program submitted a *Receiving Water Limitations Assessment Report* to the Water Board on March 31, 2023. The Receiving Water Limitation (RWL) Assessment Report was conditionally approved on June 12, 2023, allowing Permittees to proceed with RWL monitoring in Water Year (WY) 2024 with inclusion of polycyclic aromatic hydrocarbons (PAHs) in the analyte list and a demonstration of the representativeness of the selected monitoring locations to be submitted by March 31, 2024. The Program participated in a BAMSC regional project to prepare the *Receiving Water Limitations Assessment Report Addendum, Demonstration of the Representativeness of the Selected Monitoring Locations* as part of the Urban Creeks Monitoring Report (UCMR) submitted on March 31, 2024. In FY 2023/24, the Program collected three wet season events for Pollutants of Concern (POC) RWL monitoring at the selected location on Castro Valley Creek. The results will be reported in the UCMR submitted on March 31, 2025.

C.11 Mercury and C.12 PCBs

The Program submitted the *Alameda County Old Industrial Area Control Measure Plan, Version 1.1* to the Water Board on March 31, 2024. The Program also completed the *Mercury and PCBs Control Measures – Update 2024*.

C.20 Cost Reporting

Working collaboratively with BAMSC the Program completed revisions to the *Bay Area Cost Reporting Framework and Guidance Manual* (Framework and Guidance Manual) and provided training to ACCWP Members in May 2024 on the background and use of the Framework and Guidance Manual. The initial training was attended by 25 Members and Program staff and recording of the training is available to the ACCWP Members.

Provision C.2 Municipal Operations

Requirement: Provision C.2 requires Permittees to implement Best Management Practices (BMPs) to control and reduce non-stormwater and polluted stormwater discharges to storm drains and watercourses during operation, inspection, and routine repair and maintenance activities from municipal facilities and infrastructure.

Program Activities: To assist Member Agencies in complying with this provision, the Program held three Municipal Maintenance Subcommittee meetings and two workshop planning meetings during the FY. Mike Wells, City of Livermore, was the Chair of the Subcommittee. Subcommittee topics included the challenges maintenance crews faced while performing basic maintenance duties near homeless encampments, maintenance issues associated with trash capture devices, and the need to train new staff about the stormwater program. The Subcommittee also discussed ongoing flooding issues associated with large rain events and high tides and the importance of maintaining flood-prone areas before a rain event. The Subcommittee continues to provide a forum for Member Agencies to share information, benefit from other municipal staff field experiences, and receive information on products and training related to municipal maintenance activities.

Provision C.2.h: Staff Training

Requirement: Provision C.2.h requires Permittees to provide training at least once within the five-year term of the Permit to municipal staff on topics relevant to municipal staff responsible for maintenance activities.

Program Activities: To comply with this provision, the Municipal Maintenance Subcommittee hosted a workshop on October 18, 2023, at the City of Fremont's corporation yard. The training introduced the stormwater program and maintenance BMPs and provided a refresher on using the Trash Collector App. Lessons learned from the FY 2022/23 storm season were presented by representatives from the Cities of Union City and Livermore and showcased the importance of being proactive and prepared for rain events. The field portion of the workshop included several equipment demonstrations and vendors. In addition to the content presented, the workshop was an opportunity for maintenance staff from various Member Agencies to meet and share ideas about stormwater BMPs and municipal maintenance equipment. The training was well attended, with 72 participants from 11 agencies. Overall, participants found that the workshop was instructional and met their expectations. Appendix A contains the workshop materials and evaluation summary.

Provision C.3: New Development and Redevelopment

Requirement: Provision C.3 requires Permittees to use their planning authorities to include appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects to address stormwater runoff pollutant discharges and prevent increases in runoff flows from new development and redevelopment projects.

Provision C.3.a.i.(4): Provision C.3 Training

Requirement: Provision C.3.a.i.(4) requires Permittees to provide training adequate to implement the requirements of Provision C.3 for staff, including interdepartmental training.

Program Activities: To assist Member Agencies in complying with this provision, the Program provides C.3 training every other year. The Program's FY 2023/24 workshop focused on provision C.6. However, two other trainings relevant to C.3 were provided: In October 2023, training was provided on the updated Bay Area Hydrology Model (BAHM), including a module for municipal reviewers. This virtual training was recorded and can be accessed by Members and the public on the BAHM [download](#) page. In February 2024, the Program provided training on the merged AGOL C.3/C.10 inspection application.

Provision C.3.b: Regulated Projects

Requirement: Under Provision C.3.b, the Permittees must require all projects fitting the category descriptions provided in Provision C.3.b.ii (i.e., Regulated Projects) to implement LID source control, site design, stormwater treatment, and alternative certification by third party reviews, as required in Provisions C.3.c, C.3.d, and C.3.f. Provision C.3.b.iv.(2) lists detailed information that must routinely be included in Annual Reports for Regulated Projects that are approved during the reporting period.

Program Activities: To assist Member Agencies in compiling the information on C.3 Regulated Projects that they are required to routinely report in accordance with Provision C.3.b.iv.(2), the Program continued to maintain the AGOL C.3 Tracking Tool. This software tool includes a feature to support the reporting of C.3 Regulated Projects by Member Agencies in the annual reports they prepare for compliance with MRP 3.

Provision C.3.c: Low Impact Development (LID)

Requirement: Provision C.3.c requires Permittees to implement LID source control, site design, and stormwater treatment requirements in all Regulated Projects.

Program Activities: To assist Member Agencies in complying with the requirements of this provision, the Program maintains the Program's *C.3 Technical Guidance* manual, which provides comprehensive guidance to project applicants and designers of municipal capital projects regarding the implementation of LID source control, site design, stormwater treatment, and hydromodification management (HM) measures. The manual underwent a major update in FY 2022/23, and Version 8 accounted for the new MRP 3 requirements, as well as providing new content. In FY 2023/24, following the MRP amendment, the manual was revised to update the information on Special Projects Category C, and Version 8.1 was posted in March 2024. The manual was subsequently updated, and Version 8.2 was published in May 2024. The New Development Subcommittee (NDS) additionally developed a new guidance fact sheet to provide C.3 guidance for [parking lot maintenance projects](#).

Provision C.3.d.iv: Tree Runoff Reduction and Tree-Based Stormwater Treatment Systems

Provision C.3.d.iv allows Permittees to collectively submit a proposal that evaluates the benefits and associated criteria of runoff reduction associated with trees with respect to treatment control sizing; that evaluates and includes, as appropriate, the findings of the Healthy Watersheds, Resilient Baylands project; and that will be considered for incorporation into a subsequent Permit.

Program Activities: Following discussions with the Water Board staff, the MRP Permittees collectively decided not to pursue developing this optional report.

Provision C.3.e.i.(2): Payment of In-Lieu Fees

Requirement: Under Provision C.3.e.i.(2), Permittees may allow a Regulated Project to treat a portion of the amount of runoff identified in Provision C.3.d for the Regulated Project's drainage area with LID treatment measures onsite or with LID treatment measures at a joint stormwater treatment facility and pay equivalent in-lieu fees to treat the remaining portion of the Provision C.3.d runoff with LID treatment measures at a Regional Project.

Program Activities: To assist Member Agencies in providing an in-lieu fee option the NDS formed a workgroup to research and evaluate options. In FY 2024/25, the workgroup plans to move forward with the development of tools for Member Agencies to create their own in-lieu fee programs, while continuing to evaluate countywide or regional program options.

Provision C.3.g.vi.(4): Bay Area Hydrology Model (BAHM) Modifications

Requirement: Provision C.3.g.vi.(4) requires Permittees allowing the use of the BAHM to annually report collectively a listing, summary, and date of modifications made to the BAHM, including the technical rationale.

Program Activities: The BAHM is a tool developed to assist Permittees and development project engineers with sizing and design of facilities needed to meet the HM requirements in Provision C.3.g and to demonstrate that planned facilities meet the HM standards. The BAHM was funded jointly by the Santa Clara, San Mateo, and Alameda countywide stormwater programs. These programs also funded an update to the BAHM and User Manual in 2013.

In FY 2023/24, the Program, along with three other countywide programs, provided in-kind support to a BAMSC project of regional benefit to update the BAHM and User Manual. Program representatives participated in the BAHM Updates Work Group to continue overseeing the project. Updates to the BAHM software and User Manual were completed in FY 2022/23 and finalized in FY 2023/24. See the Provision C.3.a.i.(4) Training section above regarding training on the revised BAHM.

After the release of BAHM 2023, discrepancies regarding rainfall data utilized in the BAHM 2023 software were identified and corrected. A revised User Manual and model were released in June 2024. The discrepancies arose from challenges with many discontinued or inaccurate rain gages between the 2013 and the 2023 versions of the BAHM. The changes are described in a memorandum provided in Appendix B.

Provision C.3.h: Operation and Maintenance of Stormwater Treatment Systems

Requirement: Provision C.3.h requires each Permittee to implement an Operation and Maintenance (O&M) Verification Program in accordance with the requirements specified in Provision C.3.h.

Program Activities: The Program continued to support Members by maintaining AGOL C.3 Tracking Tool to facilitate data entry of C.3 projects and continued improvements to the AGOL Field Maps app for collecting and documenting data during O&M verification inspections by merging the C.3 and C.10 inspection apps. As described in the Provision C.3.a.i.(4) C.3 Training section, training on the merged Field app was provided in FY 2023/24.

Provision C.3.i: Required Site Design Measures for Small Development and Redevelopment Projects and Smaller Detached Single-Family Home Projects

Requirement: Provision C.3.i requires Permittees to enforce that development and redevelopment projects and detached single-family home projects within certain impervious surface area criteria to install one or more site design measures listed in Provision C.3.i.i.

Program Activities: The Program continued to maintain the *C.3 Technical Guidance* manual, as described in the Provision C.3.c LID section. The manual provides information on the requirements and project thresholds for Small Projects and Smaller Detached Single-Family Home Projects.

Provision C.3.j: Green Infrastructure Planning and Implementation

Requirement: Provision C.3.j requires each Permittee to continue to implement a Green Infrastructure (GI) Plan for the inclusion of LID storm drain infrastructure on public and private lands. The Plan serves as an implementation guide and reporting tool during this and subsequent Permit terms to provide reasonable assurance that urban runoff Total Maximum Daily Load (TMDL) waste load allocations (e.g., for the San Francisco Bay mercury and polychlorinated biphenyls (PCBs) TMDLs) will be met, and to set goals for reducing, over the long term, the adverse water quality impacts of urbanization and urban runoff on receiving waters.

Program Activities: To assist Member Agencies in complying with this provision, the Program conducted various activities, described here and in the specific sub-provisions of C.3.j below. The Program addressed topics related to GI at meetings of the NDS, including information sharing on the Member Agencies' activities to implement their GI Plans. The Program continued to maintain the *C.3 Technical Guidance* manual, as described in the Provision C.3.c LID section, which includes a chapter on Public Agency Projects and appendices that provide resources and references to assist Members with implementing GI projects.

Provision C.3.j.ii.(1)(g): Green Infrastructure Plan Outreach and Education

Requirement: Provision C.3.j.ii.(1)(g) requires Permittees to conduct outreach and education on the requirements of Provision C.3.j and methods of implementation, including public outreach (both general outreach and targeted outreach to professionals involved in infrastructure planning and design); staff training (including planning, engineering, public works maintenance, finance, fire/life safety, and management staff); and education of appropriate Permittee elected officials (e.g., mayors, city council members, county supervisors, and district board members).

Program Activities: To assist Member Agencies in complying with this provision, the Program continued to make available to Member Agencies various tools developed during MRP 2, and information on GI is featured on the Program's [Green Infrastructure website](#). Regionally, the Program supports BAMSC's outreach efforts that are described in the Provision C.3.j.iv Participate in Processes to Promote GI section.

Provision C.3.j.ii.(3): Design and Other Criteria

Requirement: Provision C.3.j.ii.(3) requires GI projects built pursuant to Provision C.3.j to comply with Provisions C.3.c, C.3.e-h, and C.3.d. With cause, Permittees may use the Guidance for Sizing Green Infrastructure Facilities in Streets Projects with companion analysis Green Infrastructure Facility Sizing for Non-Regulated Street Projects to size non-regulated green streets projects.

Program Activities: The Program continued to maintain the *C.3 Technical Guidance* manual, as described in the Provision C.3.c LID section, which includes a chapter on Public Agency Projects and information on alternative sizing requirements for non-regulated road projects.

Provision C.3.j.ii.(4): Long-Term Green Infrastructure Implementation

Requirement: Provision C.3.j.ii.(4) allows Permittees, Water Board staff, and impartial science experts to collectively form a Technical Working Group to discuss long-term GI goals and recommend long-term percentage reductions in Permittees' impervious surfaces.

Program Activities: To assist Member Agencies, the Program participated in regional discussions regarding initial planning for the creation of a working group. Representatives from the Program and the San Mateo and Santa Clara countywide programs met with Water Board staff to discuss the formation and goals of the working group and led the development of a work plan for a BAMSC project of regional benefit for FY 2024/25. The working group will be formed in early FY 2024/25.

Provision C.3.j.iv: Participate in Processes to Promote Green Infrastructure

Requirement: Provision C.3.j.iv requires Permittees to, individually or collectively, track processes, assemble and submit information, and provide informational materials and presentations as needed to assist relevant regional, state, and federal agencies with planning, design, and funding incorporation of GI measures into local infrastructure projects, including transportation projects. Issues to be addressed include coordinating the timing of funding from different sources, changes to standard designs and design criteria, ranking and prioritizing projects for funding, and implementation of cooperative in-lieu programs.

Program Activities: To support the Member Agencies in complying with this provision, the Program participated through BAMSC in sharing information about regional efforts and outreach, which are described in the *Regional Supplement for New Development and Redevelopment* (Appendix B). Additionally, meetings of the NDS included information-sharing regarding Green Stormwater Infrastructure (GSI) implementation.

Provision C.3.j.v: Tracking and Reporting Progress

Requirement: Provision C.3.j.v requires Permittees to continue to implement regionally consistent methods to track and report implementation of GI measures, including treated area and connected and disconnected impervious area on both public and private parcels within their jurisdictions. The methods shall also address tracking needed to provide reasonable assurance that waste load allocations for TMDLs, including the San Francisco Bay PCBs and mercury TMDLs, and trash, are being met.

Program Activities: To assist Member Agencies in complying with this provision, the Program continued to support the Alameda Countywide GSI Mechanism for its Member Agencies to use in prioritizing and mapping areas for planned and potential GSI projects. The mechanism consists of the Alameda Countywide Multi-Benefit Metrics Prioritization Protocol interface, in conjunction with the AGOL C.3

Tracking Tool described in the Provision C.3.b Regulated Projects section. The Member Agencies continued to use the AGOL C.3 Tracking Tool to track and map information on GI measures implemented on public and private parcels.

Additional Activities

The Program held four meetings of the NDS, which is currently led by Daniel Matlock, City of Fremont, Chair, and Erwin Ching, San Leandro, Vice Chair. The NDS provides a valuable venue for Member Agency staff to share information, benefit from lessons learned by others, and receive training on permit requirements and products developed by the Program related to Provision C.3, as well as Provisions C.6 Construction Site Control, C.12.g Manage PCBs-Containing Materials and Wastes During Building Demolition Activities, and C.13.a Manage Waste Generated from Cleaning and Treating of Copper Architectural Features. In FY 2023/24, the NDS focused on supporting Members with understanding the changes to C.3.b Regulated Projects. The NDS Members participated in the regional work group related to the update of the BAHM model and the BAMSC Development Committee. Program staff and their technical consultants continued to provide on-call support to Member Agency requests for assistance regarding Provision C.3 compliance.

Provision C.4: Industrial and Commercial Site Controls

Provision C.4.d: Inspections

Requirement: Provision C.4.d requires Permittees to conduct inspections according to their Business Inspection Plan and Enforcement Response Plan to prevent stormwater pollution.

Program Activities: To assist Member Agencies in complying with this provision, the Program developed *Tips for Mobile Fueling*, updated *Tips for Mobile Fleet Services* and translated *Tips for Construction Contractors* into Spanish and Chinese. The final Tip Sheets are available on the Program's Resources [webpage](#), under the Commercial and Industrial tab. See Appendix C for the finalized Tip Sheets described above.

Provision C.4.e: Staff Training

Requirement: Provision C.4.e requires Permittees to provide focused training for industrial and commercial site inspectors and illicit discharge detection and elimination inspectors annually. Training may be program-wide, region-wide, or Permittee specific.

Program Activities: To comply with this provision, the Program's Industrial and Illicit Discharge Control (IIDC) Subcommittee sponsored a hybrid business and illicit discharge stormwater inspectors training workshop on February 22, 2024. Presentations and a field session were provided for in-person attendees. Only the presentations were available to the virtual attendees. The field session reviewed BMPs available for illicit discharge containment and clean up. The workshop included the following presentations:

- What Should Stormwater Inspectors Know About Hazardous Materials and/or Wastes?;
- Business Inspection Case Studies: Restaurant and Industrial Facility; and
- Inspector Resources.

Presentation materials from the workshop are available to Member Agencies for use as in-house training. Recorded presentations from the workshop are available to Member Agencies on the ACCWP Program's training video website. Evaluation surveys showed that the training met expectations. Overall, attendees deemed the presentations informative and useful, with an average rating of 3.7 out of 4. See Appendix C for the workshop report that includes the agenda, attendance list, and evaluations.

Additional Activities

The Program held four IIDC Subcommittee meetings during the FY 2023/24. Aileen Mendoza, County Department of Environmental Health, served as the Chair of the subcommittee, and Echo Lee, City of Alameda, served as the Vice Chair. On average, 21 people attended each meeting and shared information on MRP 3 compliance and activities. The IIDC meetings provide a valuable venue for Member Agency staff to share information, benefit from lessons learned by others, and receive information on permit requirements and products developed by the Program related to Provision C.4, as well as Provisions C.5 Illicit Discharge Detection and Elimination, C.13.b. Manage Discharges from Pools, Spas and Fountains that Contain Copper-Based Chemicals, C.13.c Copper Source Control for Industrial Sources, and C.15. Exempt and Conditionally Exempt Discharges.

Provision C.5: Illicit Discharge Detection and Elimination

Provision C.5.c: Spill, Dumping and Complaint Response Program

Requirement: Provision C.5.c requires Permittees to implement a program to respond to spills, dumping and complaints.

Program Activities: To assist Member Agencies in complying with this provision, the Program maintains a list of Member Agencies and a point of contact for reporting spills on the Program's "Report a Spill" [webpage](#). The list is periodically updated.

Provision C.5.e: Control of Mobile Sources

Requirement: Provision C.5.e requires Permittees to implement a program to reduce the discharge of pollutants from mobile businesses. The Program must include standard BMPs, an enforcement strategy, inventory, outreach strategy, and inspections, as needed. Permittees may cooperate countywide and/or region-wide with the implementation of their programs for businesses, including sharing of mobile business information, BMP requirements, enforcement action information, and educational materials.

Program Activities: The categories of mobile businesses currently addressed by the Program include automobile washing, power washing, steam cleaning, carpet cleaners, pet care providers, graffiti removal, and mobile fuelers. These mobile business categories have minimum standards and BMPs identified in a series of Tip Sheets developed by the Program:

- *Tips for Mobile Businesses;*
- *Tips for Pet Care Providers;*
- *Tips for Carpet Cleaners;*
- *Tips for Pools, Spas, and Fountains;*
- *Tips for Fundraising Car Washes;*
- *Tips for Graffiti Removal;*
- *Tips for Mobile Fleet Service Providers;*
- *Tips for Surface Cleaning & Power Washing;*
- *Tips for Surface Cleaning & Power Washing (Spanish);*
- *Tips for Surface Cleaning & Power Washing (Chinese); and*
- *Tips for Graffiti Removal.*

During this FY, the *Tips for Mobile Sheet Service Providers* Tip Sheet was updated and *Tips for Mobile Fueling* was developed. All the Tip Sheets are available on the Program's Mobile Businesses [webpage](#).

Outreach to Mobile Businesses: The Program developed a countywide mobile business inventory from individual agencies, internet searches, the BAMSC surface cleaners list, Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) inventory, and the Contra Costa Clean Water Program (CCCWP) inventory in FY 2016/17. The countywide inventory is updated periodically with businesses identified by municipal inspectors. The inventory is available on the IIDC Subcommittee's Members-only webpage.

Mobile Business Enforcement Strategy: In FY 2017/18, the IIDC Subcommittee worked with the Alameda County DA's office to develop an enforcement strategy for mobile businesses. When City and County IIDC inspectors issue an enforcement action to a mobile business, they will also complete a Referral Form for the District Attorney (DA). The DA's office will keep a list of mobile businesses that receive

enforcement actions from all jurisdictions in Alameda County. If an individual business receives more than one enforcement action, even if they are from different jurisdictions, the DA's office may choose to take action. The Referral Form was emailed to the Subcommittee for reference and use again during this FY.

BAMSC is continuing the Surface Cleaner Training and Recognition Program that educates mobile surface cleaners about proper BMPs to protect water quality and allows them to market themselves as "recognized" cleaners. This FY, BAMSC updated the BMP brochure, quiz, and videos to emphasize that wash water is not allowed in the storm drain. BAMSC maintains the [website](#) with the BMPs, training resources, and recognized cleaners list.

Additional Activities

See the C.4.e Staff Training section for a description of illicit discharge related training that was included in the IIDC workshop. Illicit Discharge Detection and Elimination Program activities are also discussed at the IIDC Subcommittee meetings.

Provision C.6: Construction Site Control

Provision C.6: Construction Site Control

Requirement: Provision C.6.b requires each Permittee to implement a construction site inspection and control program at all construction sites, with follow-up and enforcement consistent with each Permittee's respective enforcement response plan, to prevent construction site discharges of pollutants into storm drains.

Program Activities: To assist Member Agencies in complying with this provision, the Program included discussions of Provision C.6 requirements at meetings of the NDS, in which Member Agency staff share information, learn from the experience of other agencies, and receive guidance and training from the Program. Examples of C.6-related topics addressed at NDS meetings include discussing preparations for the wet season, implementing BMPs, and planning the FY 2023/24 C.6 training workshop. Additionally, Program staff and their technical consultants continued to provide on-call support to Member Agency requests for assistance regarding Provision C.6 compliance.

Provision C.6.e.ii.(1): Wet Season Notification

Requirement: Provision C.6.e.ii.(1) requires Permittees to, by September 1 of each year, remind all site developers and/or owners of projects disturbing one acre or more of soil, hillside projects, and high priority projects to prepare for the upcoming wet season.

Program Activities: To assist Member Agencies in complying with this provision, an email notification was sent to NDS Members on August 1, 2023, regarding the requirement for Member Agencies to provide pre-wet season notifications by September 1, 2023, to all site developers or owners of hillside sites, high priority sites, and sites disturbing one acre or more of soil, in order to prepare for the upcoming wet season.

Provision C.6.f: Staff Training

Requirement: Provision C.6.f requires Permittees to provide training at least every other year to municipal staff responsible for conducting construction site stormwater inspections.

Program Activities: To assist Member Agencies in complying with this provision, the Program held virtual construction stormwater training on April 30, 2024. The presentations provided fundamental information on the C.6 requirements and BMPs; information on documenting inspections, followed by a group exercise to practice documenting inspections using photos from construction sites; and two case studies (implementing demolition site BMPs and BMPs for a creek-side project). Water Board staff participated in the training and gave a presentation. The workshop was attended by 75 agency staff and consultants that support Member Agencies. The post-workshop report is included in Appendix D.

Provision C.7: Public Information and Outreach

Provision C.7.a: Outreach Campaigns

Requirement: Provision C.7.a requires Permittees to participate in or contribute to outreach campaigns, with the goal of significantly increasing overall awareness of stormwater runoff pollution prevention messages and behavior changes in target audiences.

Program Activities: To comply with this provision, the Program conducted the activities described below.

Public Outreach Campaign

The FY 23/24 public outreach campaign effort included the promotion of existing Fred & Izzy videos covering all the strategic messaging goals: litter, pesticide reduction (OWOW program), car washing, surface hosing, fishing, mercury bulb pollution, pet waste, hiring a certified eco-friendly pest contractor, and general watershed/stormwater education. These videos were promoted throughout the year via a strategy that used a mix of smaller, digital promotions on the usual low-cost media, such as Facebook, Google, and YouTube, TikTok, and streaming video.

Market Research Survey

In addition to running the various campaigns, the Program engaged EMC Research, a market research contractor, to conduct a survey to determine message penetration in the community and test sample messaging. The results will be used to guide future campaigns.

The top finding noted an improved understanding of basic stormwater messages, with 58% correctly answering that storm drains flow directly to creeks and the Bay without treatment, an increase of 37% from the 2013 survey.

The survey results showed that Fred & Izzy were recognized by almost one of five respondents, and 39% of those respondents gave unprompted answers linking Fred & Izzy to environmental messaging, such as litter reduction, pollution prevention, and water quality issues. The survey results indicate positive impacts of the ongoing outreach efforts but also suggest the need to continue promoting existing content, while developing new ways to promote basic stormwater and storm drain messaging.

Top messages for motivating behavior are those that linked human health with pesticide reduction, litter reduction, and harm prevention to wildlife, including the following:

- Using non-toxic pest control methods helps keep my home safer for children and pets.
- Litter-free environments are nicer and healthier places to live, work, and play.
- Litter that goes into storm drains ends up in creeks, wetlands, and the Bay, where it harms the birds, fish, and other wildlife that live there.

Bay Area News Group Media Campaign

In addition to outreach involving Fred & Izzy, the Program sponsored a media campaign with Bay Area News Group's East Bay Times aimed at homeowners on the topics of "Detain the Rain" and healthy gardening practices. The media package included an E-blast and digital banner ads. Bay Area News Media Campaign examples are shown in Figure 3 and Figure 4.



Figure 3: East Bay Times Clean Water Program Article



Figure 4: Healthy Yards And Gardens Clean Water Program Flyer

- On April 17, 2024, the E-blast campaign targeted Alameda County homeowners aged 35 and over with interests in gardening, nature, and the outdoors. This email reached 150,000 residents and achieved an 18% open rate, translating to 26,644 people opening the email. The email directed recipients to the Program website's [Yards and Gardens page](#), resulting in 3,328 clicks.
- In addition to the E-blast, a custom content article ran from April 8 to May 15, 2024. This article generated 60,765 impressions, 33 clicks, and a click-through rate of 0.05%.
- Digital advertisements also ran alongside the campaign, delivering 50,001 impressions and 22 clicks.
- The combined efforts of the E-blast, content article, and digital ads led to a significant increase in website traffic during the campaign period compared to the same timeframe last year. Website visits jumped by 105%, with 6,303 page views compared to 3,079 visits the prior year.

Fred & Izzy Videos & Promotions Results

As of FY 2023/24, the YouTube Channel has 274 subscribers, an increase of 5.4% from FY 2022/23. Combined, all Fred & Izzy videos were viewed on YouTube over 259,265 times between July 2023 and June 2024. The videos are available at the Program's [YouTube Channel](#). The Facebook page has 1,434 followers and the Instagram page has 307. The TikTok channel has 463 followers and 9,848 likes to date. The summary of promotion results in FY 2023/24 are shown in Table 1. FY 2023/24 Media Campaign Details are shown in Table 2.

Table 1: Summary Of Results of Promotions From July 2023 Through June 2024

Media	YouTube Views	Facebook Reach	Instagram Reach	TikTok Views	Streaming Views
Totals, including Organic Posts	259,265	62,865	8,898	363,131	302,996
Total, for Paid Posts	257,852	42,773	2,613	363,131	302,996

Table 2: Campaign Details July 2023 Through June 2024

Date	Message	YouTube	Facebook	Instagram	TikTok	Streaming
September 2023	Coastal Cleanup Short Video	Views: 45,028	NA	NA	Views: 100,220 Impressions: 101,771 Clicks: 1,908 Reach: 32,397	
	Litter 2				Views: 146,127 Impressions: 148,134 Clicks: 1,262 Reach: 36,983	
February 2024	Pick-up Pet waste				Views: 98,794 Impressions: 106,361 Clicks: 2,645 Reach: 67,142	

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Date	Message	YouTube	Facebook	Instagram	TikTok	Streaming
February 2024 to June 2024	"Where" Izzy Social Media Campaign		Total Reach: 11,329 Impressions: 21,131 Engagement Rate: 13.24%			
March 2024	Watershed Video/ Storm Drain Awareness		Reach: 3,883 Views: 5,125 Impressions: 5,201			
	OWOW Resources		Reach: 3,477 Views: 4,409 Impressions: 4,421			Views: 50,527
April 2024	Healthy Gardening	Views: 55,576	Reach: 6,065 Views: 9,568 Impressions: 9,980			Views: 50,433
	Earth Day promotions: Original Litter Hurts Litter 1	Litter 1 Views: 34,710	Litter Hurts Reach: 8,994 Views: 12,476 Impressions: 13,104		Litter 1 Reach: 10,648 Views: 17,990 Impressions: 18,103 Clicks: 319	
April 2024	BANG Media Campaign: Detain the Rain	E-blast: Clicks: 3,328	Article: Impressions: 60,765 Clicks: 33	Display Ads Impressions: 50,001 Clicks: 22		
May 2024	Car Washing	Views: 47,524	Reach: 9,025 Views: 11,996 Impressions: 12,552	Reach: 2,613 Views: 5,567 Impressions: 7,213		Views: 50,608

Date	Message	YouTube	Facebook	Instagram	TikTok	Streaming
June 2024	Sweep, Don't Hose					Views: 50,475
	HHW Mercury	Views: 39,412				Views: 50,486
	Fishing Advisories	Views: 35,602				Views: 50,467

Coastal Cleanup Promotion, September 2024

Throughout Coastal Cleanup Month, September 2024, many local jurisdictions once again offered in-person events. The Program compiled a list of these local events and promoted it via its website, E-blasts and outreach partners. In addition, the Program ran social media posts, using artwork provided by the California Coastal Commission and Fred & Izzy video clips focused on litter and cleanup. Some of the Fred & Izzy video posts were promoted, results from these promotions are listed in the previous section. After the events, several “thank you” posts expressed appreciation and shared litter cleanup results. Coastal Cleanup Promotion Details are shown in Table 3.

Table 3: Coastal Cleanup Promotion Details

Date	Campaign	Promo Activities	Results
September 2024	Coastal Cleanup Month 2024 Event listing page E-blast Social media post examples: - Facebook (announcement, thank you post) - Instagram - TikTok - YouTube	E-blast, Social media posts (organic and promoted) on Facebook, Instagram, TikTok and YouTube	E-blast: 1,185 recipients 98.5% delivery rate 35.4% open rate Social media: See table in previous section.

Earth Month, April 2024

Organized by jurisdictions throughout Earth Month, April 2024, in-person activities included clean-ups, restoration and tree-planting events, and Earth Day fairs. Like Coastal Cleanup Month, the Program compiled a list of these local events and promoted it via the website, E-blasts, and outreach partners. In addition, the website offered “evergreen” activity downloads for adults and kids to protect waterways from home. Earth Month Promotion Details are shown in Table 4.

Table 4: Earth Month Promotion Details

Date	Outreach Tactic	Promo Activities	Results
April 2024	Earth Month 2024 Event listings page Activities download page E-blast Social media post examples: - Facebook - Instagram	E-blast, Social media posts (organic and promoted) on Facebook, Instagram.	E-blast: 1,185 recipients 98.5% delivery rate 38.5% open rate Social media: See table in previous section.

Fishing Advisory Campaign

The Program ran a digital campaign to promote awareness of fish consumption health advisories. The ads targeted fishing and outdoor enthusiasts and included Google Display Ads, Facebook, Instagram Reels, YouTube, and streaming video. In addition to digital advertising, a paid article and advertisement in the Fish Sniffer Online Magazine reached 30,000 readers interested in fishing in California. Digital ads linked to the Program's [Fishing and Health page](#). The Fish Sniffer ads directed viewers to the State of California's Fishing Advisory page. Website traffic to this page increased by 834% compared to the same month the previous year, with 2,298 visits in June alone compared to the previous year of 246 visits. Fishing Advisory Campaign Promotion Details are shown in Table 5.

Table 5: Fishing Advisory Campaign Promotion Details

Date	Campaign Content	Promo Activities	Results
June 2024	Fishing in the Bay Promote awareness of fish consumption health advisories. Fishing and Health content landing page	Web Page	Website: 2298 pageviews
	30-second Video (vertical format)	Instagram Reels (Organic post)	Views: 123 Likes: 3 Reach: 104
	Google Display Ad	Google Display Ad	Impressions: 205,242 Clicks: 2,078
	30-second Video	YouTube	Impressions: 60,959 Views: 35,602
	30-second Video	Streaming Video	Completed Views: 50,467 (100% of video watched)
	Print Ad, Article	Fish Sniffer Magazine	Reach: 30,000 subscribers

Provision C.7.b: Stormwater Pollution Prevention Education

Requirement: Provision C.7.b: Permittees shall continue to maintain a point of contact to provide the

public with stormwater pollution prevention information.

Program Activities: To comply with this provision, the Program conducted the following activities.

Website and Website Promotions

The Program’s website can be found at www.cleanwaterprogram.org. Besides comprehensive content on commercial stormwater pollution prevention issues, compliance guidelines and resources, the website offers information on the local watersheds and monitoring, the Program’s school outreach, and content tailored to residents, promoting everyday practices to help prevent stormwater pollution. Focus areas include toxics reduction and runoff prevention in home and garden, less-toxic pest control at home, car care, litter prevention, healthy fish consumption, and local volunteer opportunities. Users can connect with the Program through email or phone, listed in the “Contact Us” section.

In FY 2023/24, the website received a total of 55,839 page views. This is an increase of 74% compared to last year. With an average session duration of 1:08 minutes. Sessions per month during the reporting period are shown in Figure 5.

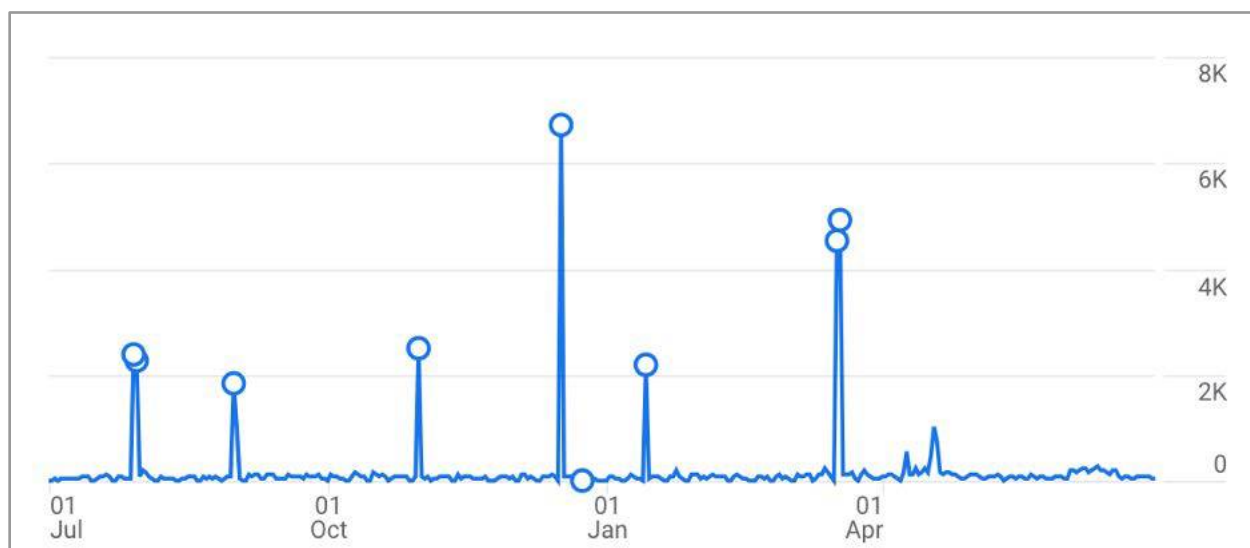


Figure 5: Website Traffic, July 1, 2022 Through June 30, 2024

The site receives steady “baseline” traffic to pages tailored to the commercial audience, due to compliance requirements. “Peaks” in traffic are generally due to residential traffic that ebbs and flows with seasonal and topic-specific promotions. Throughout the FY, the Program launched several outreach efforts to drive traffic to specific portions (pages) of the residential website content.

Typically, efforts included one or more E-blasts to the Program’s E-news subscribers and social media posts. The campaigns described in section C.7.b. also used online advertising (YouTube video ads, Google display ads, search ads, text ads, and Facebook and TikTok ads), resulting in periods of particularly high website traffic. The peaks in the graph above correspond to Program’s seasonal promotions along with monthly Fred & Izzy short video campaigns.

About the E-blasts: The Program maintains an email database of 1,293 active contacts, as of June 2024. Residents can opt into receiving E-blasts via a signup form on the website or at outreach/tabling events.

In addition to sending E-blasts to the Program's email list, the content was pitched directly to selected local media outlets to promote coverage. Other contacts, including neighborhood and creek groups, social media interest groups, and member cities helped increase the reach of Program announcements via their own E-blast, newsletter, or website listing, and/or by sharing a social media post.

Social Media

The Program has a presence on Facebook, X (formerly Twitter), and Instagram, with the Facebook page content managed on a weekly basis. The Program added a TikTok channel last year to reach younger viewers, since that platform is popular with Gen Z (age 10-20). The posting strategy includes promoting Program projects, events, and issues through original content, sharing Member Agency posts, monthly paid promotions, and posts about local watershed related events. Posts were made weekly from July 1, 2023, to June 30, 2024.

In February, the Program launched the "Where's Izzy?" campaign. The Program hid Izzy at five scenic locations in Alameda County, encouraging residents to guess where Izzy might be. These locations could be found on the [Waterful World](#) page on the website.

The results were a wave of success! Over 21,131 people saw our posts, reaching over 11,329 unique accounts. The Program saw an incredible engagement rate of 13.24%, which is way above average. Compared to Facebook's benchmarks of 1-5% being good, our interactive campaign proves that contests and calls to action make a big impact with our audience. Here is where Izzy hid:

- Alameda Creek Regional Trail;
- Lake Chabot;
- Dublin Dougherty Hills Dog Park in;
- Coyote Hills; and
- San Leandro Marina.

Five winners who guessed correctly received custom Clean Water Program Stanley cups. This campaign is a testament to the power of engaging content.

Facebook: <https://www.facebook.com/CleanWaterProgram>

The Program's Facebook page currently has 1,433 followers, a slight increase from the previous year. During the reporting period, the page reached 62,865 users. Paid promotions reached over 58,362 people with over 120,000 impressions and 482 link clicks received.

Instagram: <https://www.instagram.com/cleanwaterprog/>

The Program's Instagram page currently has 308 followers, a 10% increase from the previous year (280 followers). In the period from July 1, 2023, through June 30, 2024, the page had 39 posts and reached 8,898 accounts with 230 link clicks, an increase of 100% from the previous fiscal year (112 link clicks). Content interaction, defined as "the number of likes or reactions, saves, comments, shares and replies on your content," also increased 100% to over 1,300 interactions.

X (formerly) Twitter: <https://x.com/CleanWaterProg%5b1>

In FY 2023/24, we reduced our activity (currently with 107 followers). This decision came after changes in Twitter's services shifted to X, and we observed lower engagement compared to other social media channels. As a result, we made five tweets during this period, generating 515 impressions, five link clicks, and five shares.

TikTok: https://www.tiktok.com/@fred_and_izzy

The Program's TikTok account currently has 456 followers. During FY 2023/24, three vertical format snippets were posted and promoted, and received a total of, 363,131 video views, 894 likes, increased by 41 followers, and 3,489 link clicks, an increase of 71% clicks compared to previous year.

Provision C.7.c: Public Outreach and Citizen Involvement Events

Requirement: Provision C.7.c requires Permittees to annually provide a certain number of public outreach and citizen involvement events based on the Permittee's population.

Program Activities: To comply with this provision, the Program conducted the following activities.

Alameda County Fair Outreach Event

On behalf of all members, the Program coordinated and installed an exhibit at the Alameda County Fair. The fair was open on Wednesdays-Sundays from June 14 to July 7, 2024.

In line with this year's County Fair theme, "That Summer Feeling," the Program booth highlighted the beauty and recreational opportunities of the county's natural spaces and promoted litter-free, zero-waste outdoor behaviors with a picnic setup that also doubled as a photo booth.

Visitors were invited to sit (or stand) on the floor graphic of the picnic blanket and borrow props and hand-held signs, found in the picnic basket, to take (and share) fun selfies. If they posted and tagged the program, they were entered to win a Zero Waste Picnic backpack set. The background mural shows how runoff from neighborhoods flows directly to our creeks—making the litter-free message very relevant and reinforcing the connection between storm drains and waterways. There were two displays: one about zero waste picnics and one about "waterful" places to visit. Other activities for visitors included peeking into a storm drain model and a wildflower seed giveaway.

The booth was staffed by program member volunteers or consultants on 12 of the 18 days during weekdays. Pictures of the County Fair booth and attendees posing for a picture with Fred and Izzy are shown in Figure 6 and Figure 7.



Figure 6: Photo Of The County Fair Program Booth



Figure 7: Photo of County Fair Attendees At The Booth

Provision C.7.d: Watershed Stewardship Collaboration

Requirement: Provision C.7.d requires Permittees to encourage and support development of grassroots watershed groups or engagement of an existing group, such as a neighborhood association, in watershed stewardship activities.

Program Activities: To comply with this provision, the Program conducted the following activities.

In FY 2023/24, the Program resumed its annual Community Stewardship Grants Program that had been paused for three grant cycles (FY 2020/21 through FY 2022/23) due to the COVID-19 pandemic. The Grants Program allocated up to \$30,000, to be awarded in small grants between \$500 and \$6,000 per project.

Led by a work group formed among members of the PIP Subcommittee and their facilitator, the Program revised the application process, announced and promoted the grant cycle, collected applications and selected grantees for funding. Details of the Community Stewardship Grants Program are shown in Table 6. A list of the awarded grantees and project details are shown in Table 7; a total of \$29,550 was awarded.

Table 6: Community Stewardship Grants Program FY 2023/24 Details

Date	Activities	Results
March 13	Grant program announced: Grants webpage E-blast Social media: Facebook , Instagram	E-blast: 1,283 recipients 98.5% delivery rate 46.1% open rate
March-May	Outreach to local media outlets, outreach partners, grant aggregators, past grantees, creek groups, local jurisdictions and others.	Broad coverage in local media, City newsletters and social media channels, educational outlets, etc.
May 10	Submission deadline	15 applications received
May/June	Review and evaluation of applications, Grantees selected and notified.	5 grant projects selected

Table 7: Projects Awarded Community Stewardship Grants

Grantee	Project location	Project focus	Grant amount
EarthTeam	Oakland	Pet waste	\$5,800
ForestR	Castro Valley	Demo park/garden for non-toxic gardening practices	\$6,000
I Heart Oakland Alameda Estuary	Alameda/Oakland	On-the-water litter cleanup	\$6,000
Sogorea Te' Land Trust	Berkeley	Creek restoration, raingarden	\$6,000
Urban Compassion Project	Alameda/Oakland	Illegal dumping	\$5,750

The contract agreements with the selected grantees will be made in FY 2024/25. The Program is contracting with the Alameda County Resource Conservation District to administer the Community Stewardship Grants Program. The grant-funded projects must be completed by the end of FY 2024/25.

Provision C.7.e: School-Age Children Outreach

Requirement: Provision C.7.e requires Permittees to implement outreach activities designed to increase awareness of stormwater and/or watershed message(s) in school-age children (K through 12).

Program Activities: During FY 2023/24, school outreach was performed by two of the environmental education organizations contracted by the Program: Kids for the Bay and Caterpillar Puppets. Livermore Area Recreation and Parks Department (LARPD) did not renew their contract for this year. Through a competitive request for proposals process, the Program selected educational service providers who will begin work in FY 2024/25.

Kids for the Bay ran the Storm Drain Rangers program in 14 classrooms at six elementary schools, where they conducted cleanups and litter audits, assemblies, and five classroom lessons on storm drains, litter, and water pollution. In total, 70 lessons were conducted at the 14 classrooms. Students collected 3,601 pieces and 250 gallons of trash. Environmental stewardship activities totaled 858 hours.

The Storm Drain Rangers Schoolwide Trash Reduction Program is designed to engage and educate elementary school students in Alameda County about stormwater pollution reduction. Grade level teams of students and teachers learn about watersheds, stormwater pollution, and pollution prevention strategies. Students perform a school campus cleanup and record data on the types of pollution observed and the number of pieces and gallons of litter they collected. Students deliver a schoolwide assembly, virtually or in person, to inspire their buddy classes, families and/or their entire school to participate in trash cleanup efforts and practice the Five Rs (Reduce, Reuse, Recycle, Rot, and Refuse) to reduce trash and waste at the source. Students also create and share informational posters to educate others about taking care of the watershed and reducing plastic pollution. A picture of students participating in litter audits in the Storm Drain Rangers program is shown in Figure 8.



Figure 8: Students Participate In Litter Audits From The Storm Drain Rangers Program

Caterpillar Puppets offers watershed education puppet shows for kindergarten through third grade classes throughout Alameda County, and they continue to be in high demand. In FY 2023/24, they completed 50 presentations for a total of 4,691 students at 29 Alameda County schools. The program teaches the following topics: what is a watershed, what is a storm drain, how to keep our watershed

clean, what causes watershed pollution, and how such pollution be reduced or stopped. Caterpillar Puppets addresses the types of pollution that affect local waterways and the animals of the creek, bay, and ocean, with a special emphasis on litter. Follow-up activities are introduced to students at the Question & Answers session. Ideas include campus clean-up clubs and picking up litter at school as a first step in making a difference and stopping pollution.

Provision C.8: Water Quality Monitoring

Coordination of monitoring activities required by Provision C.8 continues through ongoing communication with the other countywide stormwater programs and their representatives via the BAMSC Steering Committee and the Monitoring and Pollutants of Concern (MPC) subcommittee. Water quality monitoring activities are also coordinated regionally through the Regional Monitoring Coalition (RMC), a collaborative effort of MRP 3 Permittees.

Provision C.8.a: Compliance Options

Requirement: Provision C.8.a outlines mechanisms that Permittees may choose to meet the monitoring requirements in Provision C.8.

Program Activities: All Alameda Permittees continue to participate in the RMC and coordinate monitoring through the Program. This agreement has been confirmed through authorization of the Program's annual work plans. Program staff and consultants continued to coordinate monitoring activities through meetings and communications of the RMC and the BAMSC MPC subcommittee. When available, the Permittees also used data collected by third-party organizations, including the San Francisco Estuary Regional Monitoring Program (RMP).

Provision C.8.b: Monitoring Protocols and Data Quality

Requirement: Provision C.8.b requires that, where applicable, monitoring data must be comparable to the Surface Water Ambient Monitoring Program (SWAMP).

Program Activities: To comply with this provision, the Program continued to ensure that monitoring activities follow the RMC Quality Assurance Project Plan (QAPP) and Standard Operating Procedures (SOPs), as updated by the RMC in 2016 and 2020 to incorporate changes in the MRP 3 requirements and SWAMP standards. The Program conducted quality control review of the monitoring reports prepared by its consultants.

Provision C.8.c: San Francisco Estuary Receiving Water Monitoring

Requirement: Provision C.8.c requires that Permittees participate in implementing an estuary receiving water monitoring program, at a minimum equivalent to the San Francisco Estuary RMP, by contributing their fair share financially on an annual basis.

Program Activities: To comply with this provision, the Program made its fair-share annual contributions to the RMP during the reporting period. The Program participated in stakeholder oversight of the RMP through BAMSC representation on the Steering and Technical Review Committees. The Program actively participated as BAMSC representatives to the following RMP work groups or teams:

- Sources, Pathways and Loadings Work Group;
- Small Tributaries Loading Strategy Team;
- Emerging Contaminant (EC) Work Group; and
- PCBs Work Group.

Participation included attending meetings or conference calls, reviewing technical reports and work products, reviewing articles included in the RMP's annual update, and providing general program direction to RMP staff.

Provision C.8.d: LID Monitoring

Requirement: Provision C.8.d requires Permittees to conduct LID monitoring to measure compliance and effectiveness of LID controls. Permittees shall regionally or at the countywide level develop LID Monitoring Plans for Executive Officer (EO) approval. Permittees shall form a Technical Advisory Group (TAG) with impartial science advisors and Water Board staff to review and make recommendations regarding the LID Monitoring Plans. With Water Board approval or conditional approval of the LID Monitoring Plans, the TAG shall be convened at least annually to provide continued feedback regarding the implementation of the LID Monitoring Plans. Permittees shall begin implementing their approved or conditionally approved LID Monitoring Plans no later than October 1, 2023. ACCWP shall sample 25 events during the permit term with an annual minimum of three events.

Program Activities: To comply with this provision, the Program joined with other countywide stormwater programs subject to MRP 3 to form the BAMSC LID Monitoring Workgroup in 2022. The LID Monitoring Workgroup meets bimonthly to discuss monitoring issues and generally support regional consistency in LID monitoring across the Bay Area. In 2022, and in collaboration with workgroup partners, ACCWP identified ideal criteria for selection of LID facilities that could be monitored using the methods prescribed in the MRP. The Program identified a bioretention facility on Admiral Toney Way in Oakland to comply with permit requirements for LID Monitoring. ACCWP is monitoring inflow and outflow from the east and west side of the facility.

The *ACCWP LID Monitoring Plan* and *BAMSC LID Monitoring QAPP* were submitted to the Water Board on May 1, 2023, for EO approval.

The Water Board conditionally approved the LID Monitoring Plan in a letter sent to the BAMSC stormwater programs on August 23, 2023. The letter permitted the MRP Permittees to proceed with equipment purchases and planning for WY 2024 (i.e., October 1, 2023, to April 30, 2024), and required the programs to revise the LID Monitoring Plan in response to the comments as expeditiously as possible sufficient to implement them during WY 2024. The LID Monitoring Workgroup summarized the comments and drafted responses in September 2023 and met with Water Board staff multiple times in Fall 2023 to resolve comments that would affect the monitoring in WY 2024. The remaining comments, related to requested revisions to the LID Monitoring Plan were resolved after a meeting with the LID TAG in April 2024 (discussed below).

To begin implementation of the LID Monitoring Plan and QAPP by October 1, 2023, the Program coordinated with the City of Oakland to obtain permissions to conduct monitoring and worked with vendors to acquire the necessary equipment. The start of the monitoring season posed some unexpected challenges, including faulty equipment and temporary flooding issues. Water Board staff and the LID TAG were kept up to date on these issues via regular email communications. The main challenges are summarized below:

- Faulty equipment: Water level sensors installed at the Admiral Toney Way bioretention facility did not operate within specification. This required replacement of the bubblers using a new vendor. This issue was not unique to ACCWP but true for all LID monitoring sites across the Bay Area. Bubbler replacements were completed by the end of February 2024.
- Temporary flooding issues: To establish a single influent point into the facility while minimizing potential for roadway flooding, ACCWP closed off five of the seven curb cuts into the facility leaving two of the inlets closest to the overflow vault open for monitoring. After observations

during an early rainfall event identified flooding issues around the vault that were potentially interfering with influent flow measurements, City of Oakland staff conducted additional site work to clear channels to allow influent flow to disperse more easily around the entire facility. Observations from a second rainfall event showed improved conditions, but flooding concerns remained. To resolve the issue, ACCWP installed sump pumps and PVC piping to move influent flow away from the vault area toward each end of the bioretention cell. This allowed the site to function more closely to the pre-monitoring condition that more evenly distributed influent through multiple entry points. The improvements were completed by February 2024.

Despite the challenges, ACCWP successfully sampled three storm events on the east side and two on the west side of the facility in March and April 2024. ACCWP conducted hydrologic monitoring throughout WY 2024, although the data collected prior to the replacement of the water level sensors will not be reliable. The LID monitoring results from WY 2024 will be presented as part of the UCMR that will be submitted by March 31, 2025. ACCWP decommissioned the site for the dry season. In Summer 2024, ACCWP will work with the City of Oakland and their contractors to perform required maintenance to support WY 2025 implementation.

In Fall 2022, the BAMSC LID Monitoring Workgroup formed and convened a TAG, which included the following science advisors and Water Board staff:

- Keith Lichten – Division Chief at the Water Board.
- Alicia Gilbreath – Environmental Scientist at the San Francisco Estuary Institute (SFEI).
- Dipen Patel – Research Engineer at the Office of Water Programs at Sacramento State University.
- Eric Strecker – Professional Engineer in California and Oregon and principal investigator for the International BMP Database.
- Michael Stenstrom – Distinguished Professor at University of California, Los Angeles, Civil and Environmental Engineering Department.

With conditional approval of the LID Monitoring Plans, the LID TAG was convened once in FY 2023/24, on April 19, 2024. The Program worked with the BAMSC LID Monitoring Workgroup to coordinate on the agenda for the TAG meeting, prepare an update on the monitoring accomplishments and challenges to date, and resolve outstanding issues raised by Water Board staff on the monitoring plans that required TAG input. Following the April 19th LID TAG meeting, the LID Monitoring Workgroup met to finalize required revisions to the LID Monitoring Plan and QAPP. A response to comments summary table, describing how MRP Permittees would revise the LID Monitoring Plans to address all Water Board staff comments in the Conditional Approval letter, was sent to Water Board staff on May 17, 2024. Accordingly, ACCWP is preparing the *ACCWP LID Monitoring Plan, Version 1.1*, and BAMSC is preparing the *BAMSC LID Monitoring QAPP, Version 1.1*. These documents are planned to be submitted to the Water Board in October 2024.

Provision C.8.e: Trash Monitoring

Requirement: Provision C.8.e requires Permittees to implement trash monitoring to verify whether Permittees' trash control actions to-date have effectively prevented trash from their jurisdictions from discharging to receiving waters and evaluate whether discharges of trash from areas of Permittees' jurisdictions where full trash capture equivalency has been achieved are causing and/or contributing to adverse trash impacts in receiving waters. Permittees shall form a TAG with impartial science advisors

and Water Board staff to review and make review and provide input on ongoing trash monitoring, site selection, analysis methods, results, and conclusions. Permittees shall convene the Trash TAG twice prior to submission of the Trash Monitoring Plan and annually thereafter. Permittees shall collectively submit a Trash Monitoring Plan by July 31, 2023, for EO approval.

Permittees shall begin implementing trash outfall monitoring based on their approved or conditionally approved Trash Monitoring Plans no later than October 1, 2023. Annually, ACCWP shall sample at three outfalls for a minimum of three storm events, including the first forecasted significant storm event and at least one storm event that is forecast to be greater than the one-year, one-hour storm event.

Permittees shall implement a pilot program for direct in-stream monitoring. Permittees shall conduct this monitoring annually, starting October 1, 2024. Annually, ACCWP shall sample at two in-stream locations for a minimum of three storm events, including the first forecasted significant storm event and at least one storm event that is forecast to be greater than the one-year, one-hour storm event.

Program Activities: To comply with this provision, the Program joined with other countywide stormwater programs subject to MRP 3 to form the BASMC Trash Monitoring Workgroup. The Trash Monitoring Workgroup meets bimonthly to discuss monitoring issues and support regional consistency in trash monitoring across the Bay Area. In 2022, and in collaboration with Permittees and Trash Monitoring Workgroup partners, the ACCWP identified criteria for selecting trash outfall locations that could be monitored safely using the methods prescribed in the MRP. The Program identified three trash outfall monitoring locations in the City of Dublin near the I-580/I-680 interchange. The BASMC Trash Monitoring Workgroup conducted a project of regional benefit to develop a Regional Trash Outfall Monitoring Plan and QAPP.

The *BAMSC Regional Trash Outfall Monitoring Plan* and *BAMSC Regional Trash Outfall Monitoring QAPP* were submitted to the Water Board on July 28, 2023, for EO approval.

The Water Board conditionally approved the BAMSC Trash Outfall Monitoring Plan and QAPP on August 31, 2023. The letter allowed the MRP Permittees to proceed with planning for WY 2024 and required a revised monitoring plan and QAPP to be submitted by July 31, 2024. The Program coordinated with the BAMSC Trash Monitoring Workgroup to address Water Board comments on the reports. The *BAMSC Regional Trash Outfall Monitoring Plan, Version 2.0*, and the *BAMSC Regional Trash Outfall Monitoring QAPP, Version 2.0* will be submitted to the Water Board by July 31, 2024.

To begin implementation of the Trash Outfall Monitoring Plan and QAPP by October 1, 2023, the Program coordinated with the City of Dublin, Zone 7 Water Agency, and California Department of Fish and Wildlife to obtain permission to conduct monitoring. The Program also ordered the necessary equipment and prepared the sites for trash monitoring by installing the netting devices and water level sensors. The Program successfully sampled the required three storm events at three outfall locations, including the first flush event and an event forecast to be greater than the one-year, one-hour storm event. The Program also successfully conducted hydrological monitoring for WY 2024. Trash outfall monitoring results from WY 2024 will be presented as part of the UCMR to be submitted by March 31, 2025.

In its Conditional Approval letter, the Water Board required ACCWP to change at least one of the three outfall monitoring sites, or add an additional site elsewhere in the county, for greater geographic

representation across the County. The Program identified a replacement outfall in the City of Hayward near De Anza Park. Thus, Site AC-CIVIC in Dublin will be discontinued after WY 2024, and site AC-CTYCTR in Hayward will be activated in WY 2025.

In March 2023, the City/County Association of Governments of San Mateo on behalf of BAMSC, was awarded an Environmental Protection Agency (EPA) Water Quality Improvement Fund (WQIF) grant for receiving water trash monitoring. A total of \$3.35 million in funding was awarded to support the *Watching Our Watersheds – Improving Trash Monitoring Methods and Pollution Prevention Strategies through Regional Partnerships in the Bay Area* (WOW Project). The grant and match funds will support Trash TAG coordination and TAG-member honorariums; evaluation of trash source control measures; implementation of a public outreach campaign; trash monitoring planning, permitting, and implementation; trash characterization and associated public engagement events; and dissemination of information and knowledge gained through trash monitoring via a guidance document, a web portal, and a Bay Area trash symposium. In FY 2023/24, the Program participated on the WOW Project Management Team, which is responsible for guiding the overall project.

As part of the WOW Project, two trash receiving water monitoring locations were identified in Alameda County – Crandal Creek at Bonanza Drive in Fremont and Alamo Canal at Dublin Blvd in Dublin. The *BAMSC Receiving Water Monitoring Plan and QAPP, version 1.0* will be submitted to the Water Board by July 31, 2024. Implementation of the Trash Receiving Water Monitoring Plan and QAPP will begin by October 1, 2024.

In 2022, the Trash Monitoring Workgroup worked together to form and convene a TAG, which included impartial science advisors and Water Board staff:

- Tony Hale, PhD – Director of the Environmental Informatics Program at SFEI.
- Shelly Moore – Executive Director of the Moore Institute for Plastic Pollution Research.
- Tom Mumley, PhD – Assistant Executive Officer at the Water Board.
- Dawn Petschauer – Stormwater Program Administrator for the City of Pasadena.
- Ted Von Bitner, PhD – Assistant Vice President at WSP USA.

Two Trash TAG meetings were held in FY 2023/24. The first Trash TAG meeting was held on March 4, 2024; the second Trash TAG meeting was held on May 15, 2024. The Program coordinated with the BAMSC Trash Monitoring Workgroup and the WOW Project Management Team to provide updates on trash outfall monitoring.

The BAMSC Trash Monitoring Workgroup will continue to meet, as needed, to facilitate TAG input, discuss monitoring issues that may arise, and support regional consistency in trash monitoring across the Bay Area.

Provision C.8.f: Pollutants of Concern Monitoring

Requirement: Provision C.8.f requires that Permittees conduct POC Monitoring to assess inputs of POC to San Francisco Bay from local tributaries and urban runoff, provide information to support implementation of TMDLs and other pollutant control strategies, assess progress toward achieving waste load allocations for TMDLs and help resolve uncertainties associated with loading estimates and impairments associated with these pollutants. In particular, monitoring required by this provision must be directed toward addressing six priority POC management information needs (described in MRP 3

Table 8.1, POC Monitoring Methods) for the priority POCs listed in MRP 3 Table 8.2, POC Monitoring Parameters, Effort and Type – which identifies the minimum effort and type of samples to be collected for each POC. In addition, Permittees were required to submit a *RWLs Assessment Report* by March 31, 2023, for EO approval. This report provides a plan for monitoring receiving waters (i.e., creeks and rivers that flow to San Francisco Bay) to provide information to assess whether RWLs are achieved.

Per Provision C.8.f.ii, Table 8.2, footnote c, Permittees must conduct or cause to be conducted EC stormwater monitoring to execute the EC stormwater monitoring strategy at a level of effort indicated in the table. This level of effort can be satisfied either through sampling and analysis of the number of samples indicated in Table 8.2 or through augmentation of the San Francisco Bay RMP ECs Monitoring Strategy in the amount of \$100,000 per year for all Permittees combined.

Program Activities: To comply with this provision, the Program continued POCs sampling in FY 2023/24. In July 2023, ACCWP conducted sampling and analysis of dissolved and total copper concurrent with Pesticides and Toxicity monitoring to address Monitoring Type #4 (Loads and Status). In August and September 2023, ACCWP sampled urban sediment/ soil in industrialized areas in Oakland to identify potential sources of PCBs to address Monitoring Types #1 and #2 (Source Identification and Contributions to Bay Impairment). In May and June 2024, ACCWP sampled in industrialized areas in two priority watersheds – Ettie Street Pump Station and San Leandro Bay – to monitor additional, old industrial areas for source property investigation (Monitoring Types #1 and #2) and to confirm ongoing moderate or high levels of PCBs to address Monitoring Type #4 (POC Loads, Concentrations, and Presence/Absence) and #5 (Trends).

Results for July, August, and September 2023 POC monitoring were reported in the WY 2023 UCMR submitted March 31, 2024. Results for May and June 2024 will be reported in the WY 2024 UCMR, to be submitted March 31, 2025. The WY 2023 UCMR also describes POC monitoring efforts planned for WY 2024.

The Program participated in a BAMSC collaborative project to prepare a *Receiving Water Limitations Assessment Report* (submitted to the Water Board on March 31, 2023). The RWL Assessment Report was conditionally approved on June 12, 2023, allowing Permittees to proceed with RWL monitoring in WY 2024 with inclusion of PAHs in the analyte list and a demonstration of the representativeness of the selected monitoring locations submitted by March 31, 2024. The Program participated in a BAMSC regional project to prepare the *Receiving Water Limitations Assessment Report Addendum, Demonstration of the Representativeness of the Selected Monitoring Locations* as part of the WY 2023 UCMR submitted on March 31, 2024. In FY 2023/24, the Program collected three wet season events for POCs RWL monitoring at the selected location on Castro Valley Creek. The results will be reported in the WY 2024 UCMR to be submitted on March 31, 2025.

In addition, Permittees have collectively agreed to augment the San Francisco Bay RMP Emerging Contaminants (ECs) Monitoring Strategy in the amount of \$100,000 per year. ACCWP Members are satisfying this requirement by annually contributing their equitable share of the cost.

Provision C.8.g: Pesticides and Toxicity Monitoring

Requirement: Provision C.8.g requires Permittees to conduct wet weather and dry weather monitoring of pesticides and toxicity in urban creeks. If a statewide coordinated pesticides and pesticides-related toxicity monitoring program begins collecting data on an ongoing basis during the Permit term,

Permittees may request that the Water Board EO modify, reduce, or eliminate this monitoring requirement.

Program Activities: To comply with this provision, in November 2022, in coordination with other RMC members, the Program conducted wet weather toxicity and pesticide monitoring collaboratively through the RMC. This collaboration satisfied all MRP 3 wet season monitoring requirements. In July 2023, ACCWP conducted dry weather toxicity and pesticide monitoring in water and sediment. Results from the November 2022 and the July 2023 sample events were reported in the UCMR submitted March 31, 2024. Dry weather toxicity and pesticide monitoring in water and sediment is planned for July 2024. Results for WY 2024 efforts will be reported in the UCMR to be submitted March 31, 2025.

Provision C.8.h: Reporting

Requirement: Provision C.8.h requires Permittees to submit the following by March 31 of each year, concerning data collected during the previous WY, October 1 – September 30 period:

- Electronic data to the California Environmental Data Exchange Network (CEDEN), including results from monitoring conducted pursuant to Provisions C.8.d, C.8.e, C.8.f, and C.8.g. Data that CEDEN cannot accept are exempt from this requirement.
- A comprehensive UCMR on these results, including an LID Monitoring Status Report, an Annual Trash Monitoring Progress Report, a Pesticides and Toxicity Monitoring Status Report, and a POC Monitoring Report.
- In 2026, an Integrated Monitoring Report (IMR), in lieu of the UCMR, will report on the data collected since the previous IMR.

Program Activities: To comply with this provision, the Program submitted its UCMR and electronic data in March 2024.

Provision C.9: Pesticides Toxicity Control

Provision C.9.d: Interface with County Agricultural Commissioners

Requirement: Provision C.9.d requires that Permittees maintain communications with county agricultural commissioners to (a) get input and assistance on urban pest management practices and use of pesticides; (b) inform them of water quality issues related to pesticides; and (c) report any observed or citizen-reported violations of pesticide regulations (e.g., illegal handling and applications of pesticides) associated with stormwater management, particularly the California Department of Pesticide Regulation (DPR) surface water protection regulations for outdoor, nonagricultural use of pyrethroid pesticides by any person performing pest control for hire.

Program Activities: To assist Member Agencies in complying with this provision, the Program contacted the County Agricultural Department to discuss any issues with the implementation of pest control regulations. The following updates were provided:

1. Within FY 2023/24, there were no observed or citizen-reported violations of pesticide regulations associated with stormwater management.
2. Within FY 2023/24, there were no violations of DPR's surface water protection regulations for outdoor, nonagricultural use of pyrethroid pesticides by any person performing pest control for hire.
3. The County Agricultural Department maintains a regulatory enforcement presence in the community, as required by law, and conducts inspections and investigations in response to complaints and incidents. As part of this work, inspectors document violations and conduct various types of enforcement response. In FY 2023/24, the County Agricultural Department conducted 775 Pesticide Use Enforcement inspections in Alameda County. A frequently encountered violation is unlicensed and/or unregistered pest control companies. The County Agricultural Department is finding unlicensed Pest Control Businesses along with Maintenance Gardeners that are operating without licenses from the DPR, and similarly have failed to register with the County Agricultural Department prior to doing pesticide work in the County. The County Agricultural Department also finds pesticides not applied in accordance with label requirements, and this year, more violations were observed with regard to container requirements and service container labeling. The County Agricultural Department has also observed violations regarding a failure by pest control operators to plan for medical care. Pest control operators should inquire and plan for pesticide-related emergencies and determine a nearby medical facility that is able to accommodate treatment. Not all medical facilities are equipped to handle pesticide-related incidents, and patients are then re-routed for medical care, thus the need for advance planning.

Provision C.9.e.ii.(1): Public Outreach: Point of Purchase

Requirement: Provision C.9.e.ii.(1) requires Permittees to:

- Conduct outreach to consumers at the point of purchase;
- Provide targeted information on proper pesticide use and disposal, potential adverse impacts on water quality, and less toxic methods of pest prevention and control; and

- Participate in and provide resources for the OWOW program or a functionally equivalent pesticide use reduction outreach program.

Program Activities: The OWOW program is now partnering with 34 retailers throughout Alameda, including nine Home Depot stores and five Ace Hardware stores. A total of 17 training events were conducted, and 151 associates received the OWOW training. The report on the ACCWP-specific FY 2023/24 OWOW activities and their effectiveness is included in Appendix E, and a California-wide OWOW report prepared by CASQA is also included in Appendix E. By offering point-of-purchase materials and via its website, the Program provides targeted information on proper pesticide use and disposal, potential adverse impacts on water quality, and less toxic methods of pest prevention and control.

Provision C.9.e.ii.(2): Pest Control Contracting Outreach

Requirement: Provision C.9.e.ii.(2) requires Permittees to conduct outreach to residents who use or contract for structural pest control and landscape professionals by (a) explaining the links between pesticide usage and water quality; (b) providing information about Integrated Pest Management (IPM) in structural pest management certification programs and landscape professional trainings; and (c) disseminating tips for hiring structural pest control operators and landscape professionals such as the tips prepared by the University of California Extension IPM Program (UC-IPM).

Program Activities: The Program explains the links between pesticide usage and water quality via numerous outreach efforts, including a Fred & Izzy video promoting IPM and promotion of the OWOW program contest. To promote pest control companies that use IPM, the Program re-ran its ad to promote the services of certified pest control professionals that use less-toxic methods. Promotions linked to the Pest Control at Home webpage, which includes details on how to hire a pest control company and links to a fact sheet, *Finding a Pest Control Company*. The page also refers visitor to the EcoWise website for a list of certified contractors.

Provision C.9.e.ii.(3): Outreach to Pest Control Professionals

Requirement: Provision C.9.e.ii.(3) requires Permittees to conduct outreach to pest control operators, urging them to promote IPM services to customers and to become IPM-certified by EcoWise Certified or a functionally equivalent certification program.

Program Activities: In FY 2017/18, the Program sent a letter to all pest control companies registered in Alameda County that encouraged them to provide and promote IPM services to their customers. In FY 2023/24, the Program ran a digital campaign aimed at consumers looking to hire a pest control company, which included a video ad using [Fred & Izzy](#) promoting the hiring of EcoWise Certified and other IPM services providers. The Program is continuing to promote EcoWise Certified contractors on its Pest Control at Home [webpage](#).

Provision C.9.f: Track and Participate in the Regulatory Processes

Requirement: Provision C.9.f requires Permittees to conduct the following activities, which may be done at a county, regional, or statewide level: (a) the Permittees shall track EPA pesticide evaluation and registration activities as they relate to surface water quality and, when necessary, encourage EPA to coordinate implementation of the Federal Insecticide, Fungicide, and Rodenticide Act and the Clean Water Act and to accommodate water quality concerns within its pesticide registration process; (b) the

Permittees shall track DPR pesticide evaluation activities as they relate to surface water quality and, when necessary, encourage DPR to coordinate implementation of the California Food and Agriculture Code with the California Water Code and to accommodate water quality concerns within its pesticide evaluation process; (c) the Permittees shall assemble and submit information (such as monitoring data) as needed to assist DPR and county agricultural commissioners in ensuring that pesticide applications comply with water quality standards; and (d) as appropriate, the Permittees shall submit comment letters on EPA and DPR re-registration, re-evaluation, and other actions relating to pesticides of concern for water quality.

Program Activities: The Program fulfilled this requirement through participation in and financial support of the CASQA True Source Control Subcommittee.¹ See the *CASQA Pesticide Annual Report and Effectiveness Assessment* in Appendix E.

¹ This Subcommittee continues the work of the former CASQA Pesticide Subcommittee and additionally addresses the source control of other priority pollutants.

Provision C.10: Trash Load Reduction

Provision C.10.a: Trash Reduction Requirements

Requirement: Provision C.10.a requires Permittees to reduce their trash load by 90% by June 30, 2023, and 100% by June 30, 2025.

Program Activities: To assist Member Agencies in complying with this provision, the Program provided technical assistance with the mapping of baseline trash generation categories, full trash capture systems, full trash capture system drainage areas, private lands drainage areas, and trash management areas. The ACCWP Trash Subcommittee, co-chaired by Ben Livsey (City of Oakland) and Jim Scanlin (City of Newark), met three times in FY 2023/24. The Subcommittee has provided a useful forum for disseminating technical information on Provision C.10 compliance, providing updates on enhancements to the Trash Reporting and Analysis AGOL application, and sharing information on trash-related topics among Member Agencies. The ACCWP Data Management-Geographic Information System (GIS) Subcommittee provided training on AGOL enhancements to the Private Land Drainage Areas (PLDAs), On-land Visual Trash Assessment (OVTA), and Full Trash Capture Maintenance AGOL Field Maps applications during FY 2023/24.

Provision C.10.a.ii: Trash Generation Area Management

Requirement: Provision C.10.a.ii requires Permittees to submit a revised Trash Generation Area Map (revised trash map) with the FY 2023/24 Annual Report to illustrate progress toward achieving trash reduction requirements (i.e., 90% and 100% compliance benchmarks). Revised trash maps are required to identify trash management areas, locations and associated drainage areas of full trash capture systems, PLDAs that will be retrofitted with full trash capture systems, or equivalent, by June 30, 2025, and other trash control actions.

Program Activities: To assist Member Agencies in complying with this provision, a BAMSC Work Group was formed to develop region-wide guidance to ensure consistency with revised trash map development. Draft regional guidance, including a description of map elements and attributes, was distributed to Member Agencies in March 2024. Meetings with Water Board staff to discuss draft regional guidance occurred in April and May 2024. The final draft supplemental regional guidance document on addressing MRP mapping and reporting requirements was distributed to Member Agencies on June 28, 2024.

Provision C.10.b.i: Full Trash Capture Systems

Requirement: Provision C.10.b.i requires Permittees to maintain, and provide for inspection and review upon request, documentation of the design, operation, and maintenance of each of their full trash capture systems, including the mapped location and drainage area served by each system. In addition, Permittees are required to provide their respective vector control agencies with the names and locations of new and existing full trash capture devices with each Annual Report by September of each year.

Program Activities: To assist Member Agencies in complying with this provision, the Program developed the Full Trash Capture Maintenance AGOL Field Maps app that allows Member Agencies to document and track the maintenance of each of their full trash capture devices, including the mapped location, drainage area, and maintenance history. To address the required vector control agency submittal, the

Program developed and submitted an Excel Spreadsheet with the device type and location of Member Agency full trash capture systems to the Alameda County Mosquito Abatement District.

Provision C.10.b.iii.(b): Visual Assessment of Outcomes

Requirement: Provision C.10.b.iii.(b) requires Permittees to conduct visual on-land assessment, including photo documentation, or other acceptable assessment method (see C.10.b.iii.(b)(iv)), of each trash generation area within which it is implementing other trash management actions or combination of actions other than full trash capture, to determine or verify the effectiveness of the action or combination of actions.

Program Activities: To assist Member Agencies in complying with this provision, the Program developed AGOL Field Maps applications that allow Member Agencies to document and track their visual assessment results of public right-of-way (i.e., public streets and sidewalks) and private land drainage areas (i.e., parking lots and other areas). Inspection data entered in AGOL may be used to report progress towards meeting the 100% trash load reduction benchmark.

Provision C.10.b.v: Source Control

Requirement: Permittee jurisdiction-wide actions to reduce trash at the source, particularly persistent trash items other than those addressed under previous Permits (i.e., expanded polystyrene food ware and single-use plastic bags) may be valued toward trash load reduction compliance for all such actions. To claim a load percentage reduction value, Permittees must provide substantive and credible evidence that new source control actions are being implemented jurisdiction-wide and reduce trash by the claimed value. A Permittee may support its claimed source reduction value with reference studies from other jurisdictions if it also provides credible evidence that the chosen source control action would achieve comparable trash reduction if implemented in the Permittee's jurisdiction. A jurisdiction-wide source control load reduction value cannot be claimed after June 30, 2025.

Program Activities: The FY 2023/24 Section 10 Annual Report Form developed by BAMSC and approved by the Water Board staff indicates that Permittees may no longer claim source control actions implemented under previous Permits. During FY 2023/24, Member Agencies who adopted new source control actions will determine if they may claim these control actions for trash load reduction compliance. If permissible, Permittee FY 2023/24 Annual Reports will provide trash load percentage reduction values for those who claim credit. Prior to FY 2022/23, all Member Agencies had previously adopted a single-use bag ban. Additionally, the following Member Agencies have adopted expanded polystyrene food ware bans: Alameda, Albany, Berkeley, Emeryville, Fremont, Hayward, Livermore, Oakland, Pleasanton, San Leandro, and Union City. The County of Alameda has also adopted a polystyrene ban that applies to the unincorporated area of the County. Member Agencies continue to implement both prohibitions as a source control action.

Provision C.10.f.i: Creek and Shoreline Cleanup

Provision C.10.f.i allows Permittees to offset part of its Provision C.10.a trash load reduction requirements by conducting cleanup of creek and shoreline areas. Offsets for creek and shoreline cleanups are optional and will no longer be applicable after June 30, 2025. With the 2024 Annual Report, Permittees that offset part of their Provision C.10.a trash load percent reduction requirement through additional cleanup of creek and shoreline areas, as described in Provision C.10.f.i, are required to submit

a summary of the additional cleanup actions implemented, and the benefit to water quality achieved through those actions.

Program Activities: To assist Member Agencies with this trash load reduction offset opportunity, the Program has developed the Trash Reporting and Analysis AGOL application to document and track their creek and shoreline cleanup efforts. Additionally, the Program provided specific guidance on how to report the implementation of additional cleanup of creek and shoreline areas, and the benefit to water quality achieved in the FY 2023/24 Section 10 Annual Report Form.

Additional Activities

The Program also conducted anti-litter public outreach efforts. See Provision C.7 reporting for details.

In addition, the Program participates in quarterly BAMSC Trash Subcommittee meetings. The Subcommittee includes Permittee staff, Water Board staff, Caltrans representatives, Non-Governmental Organization representatives, and stormwater program staff and managers. It provides a forum for Members to discuss MRP 3 compliance-related matters, receive updates from the Water Board and Caltrans, and hear from guest speakers on various trash topics.

Provision C.11: Mercury Controls

Provisions in C.11 reflect the implementation plan incorporated in the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) for the San Francisco Bay mercury TMDL. The MRP 3 Fact Sheet describes a General Strategy for Sediment-Bound Pollutants that progresses from pilot testing of controls in a few specific locations, through focused implementation in areas where benefits are likely to accrue, to full-scale implementation throughout the region, where warranted, by understanding the effectiveness of each control measure or activity. As noted in the MRP 3 Fact Sheet, the permit emphasizes specific programmatic control measures deemed effective based on implementation experience and analyses in previous permit terms. The MRP 3 control program for mercury consists of load reduction assessment, source control measures, treatment control measures, measures to reduce risk to consumers of Bay fish, and reporting.

Most of the MRP 3 provisions for mercury are similar to provisions in C.12 for controlling PCBs. In this permit term, management decisions may be driven predominantly by considerations for reducing PCBs loads but are expected to also result in mercury load reductions. Permittees may comply with any requirement of this provision through a collaborative effort.

Provision C.11.a: Assess Mercury Load Reductions from Stormwater

Requirement: Provision C.11.a requires Permittees to implement an assessment methodology and data collection program to quantify, in a technically sound manner, mercury loads reduced through implementation of pollution prevention, source control, and treatment control measures implemented during this permit term. Permittees must quantify the mercury load reductions achieved through control measure implementation in the 2026 Annual Report.

Program Activities: Pursuant to Provision C.11.a.iii(1), the Program prepared a report documenting that the control measures implemented during the MRP 2 permit term for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction. See Appendix F for the *Mercury and PCBs Control Measures – Update 2024* report, which is submitted on behalf of all ACCWP Members to comply with Provision C.11.a.iii (1).

Provision C.11.b: Program for Source Property Identification and Abatement

Requirement: Provision C.11.b requires Permittees to investigate 2,620 acres of likely mercury source properties during the MRP 3 permit term. Permittees shall take action to abate mercury sources or refer properties to the Water Board for land areas found to be contributing substantial amounts of mercury or where high mercury concentrations are found. Permittees shall implement interim enhanced O&M measures for source properties referred to the Water Board.

Program Activities: During FY 2023/24, samples were collected in August and September 2023 and May and June 2024. Based on data from 2023, no mercury source properties were identified as a result of these investigations. Results from samples collected in May and June 2024 are expected in Fall 2024. See the *Mercury and PCBs Control Measures – Update 2024* report (Appendix F) for further details.

Provision C.11.c: Program for Control Measure Implementation in Old Industrial Areas

Requirement: Provision C.11.c requires Permittees to implement, or cause to be implemented, control measures (treatment controls, diversion to wastewater treatment plants, redevelopment (provided GSI implemented in compliance with Provision C.3.b), enhanced O&M controls, or other controls) to achieve

mercury load reductions. Control measures must be implemented within the MRP 3 permit term to treat urban runoff from 664 acres of old industrial areas, areas containing known or suspected source areas, or areas with evidence of moderate to high mercury or PCBs soil concentrations.

Program Activities: To assist Member Agencies in complying with this provision, the Program submitted the *Alameda County Old Industrial Area Control Measure Plan* on March 31, 2023. The plan addressed the requirements of MRP Provisions C.11.c.iii.(1) and C.12.c.iii.(1) for providing a plan and schedule for focused implementation of control measures in old industrial areas to address mercury and PCBs load reduction requirements. On August 25, 2023, the Water Board sent a letter to the BAMSC stormwater programs stating that the Control Measure Plans (CMPs) were not acceptable and required Permittees to remedy the identified shortcomings. To address Water Board comments, ACCWP formed an ad hoc old industrial CMP workgroup focused solely on CMP revisions. The ad hoc workgroup comprised ACCWP staff and eight Permittee representatives. From October 2023, the ad hoc workgroup met twice with Water Board staff and three times internally.

Over a six-month period, the ACCWP revised the March 2023 Control Measure Plan to address Water Board comments received in August 2023. The *Alameda County Old Industrial Area Control Measure Plan, Version 1.1* was submitted on March 31, 2024. This revised plan includes maps identifying focus areas with known moderate PCBs concentrations and lays out the process by which specific treatment control measures will be assessed and implemented for these focus areas.

The *Mercury and PCBs Control Measures – Update 2024* report (Appendix F) summarizes control measures implemented in old industrial and moderate areas between July 1, 2022 and June 30, 2024, including maps of the areas treated, the acreage of catchments addressed, and a description of the control measures.

Provision C.11.d: Mercury Collection and Recycling Implemented throughout the Region

Requirement: Provision C.11.d requires Permittees to promote, facilitate, and/or participate in collection and recycling of mercury-containing consumer products, devices, and equipment, and make efforts to increase effectiveness of recycling efforts throughout the region.

Program Activities: The *Mercury and PCBs Control Measures – Update 2024* report (Appendix F) reports on efforts to promote recycling of mercury-containing products and efforts to increase effectiveness of these recycling efforts, as well as the mass of mercury-containing material collected within Alameda County and an estimate of the mass of mercury contained in the recycled material.

Provision C.11.e: Plan and Implement Green Stormwater Infrastructure to Reduce Mercury Loads

Requirement: Provision C.11.e requires Permittees to implement GSI projects consistent with the implementing requirements in Provision C.3.j.

Program Activities: Activities related to implementation of Provision C.3.j are described in the Provision C.3.j GI Planning and Implementation section above.

Provision C.11.f: Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations

Requirement: Provision C.11.f requires Permittees to update their mercury control measures implementation plan and corresponding Reasonable Assurance Analysis (RAA) as necessary by March 31, 2026.

Program Activities: The Program prepared and submitted the *Alameda County PCBs and Mercury Control Measure Plan and RAA Report* with the FY 2019/20 Annual Report. No activities related to updating the implementation plan and RAA were conducted in FY 2023/24.

Provision C.11.g: Fate and Transport Study of Mercury: Urban Runoff Impact on San Francisco Bay Margins

Requirement: Provision C.11.g requires Permittees to conduct or cause to be conducted studies concerning the fate, transport, and biological uptake of mercury discharged from urban runoff to San Francisco Bay margin areas. Permittees shall submit in their FY 2022/23 Annual Reports a workplan describing how these information needs will be accomplished, including the studies to be performed and a preliminary schedule. Permittees are required to report on the status of the studies in their FY 2022/23 Annual Report. The Permittees are required to report the findings and results of the studies completed, planned, or in progress, as well as implications of studies on potential control measures to be investigated, piloted, or implemented in future permit cycles in the March 2026 IMR.

Program Activities: MRP 3 Provisions C.11.g and C.12.i contain nearly identical language requiring Permittees to conduct or cause to be conducted studies concerning the fate, transport, and biological uptake of mercury and PCBs, respectively, discharged from urban runoff to San Francisco Bay margin areas. See the discussion under the Provision C.12.i Fate and Study of PCBs: Urban Runoff Impact on San Francisco Bay Margins section.

Provision C.11.h: Implement a Risk Reduction Program

Requirement: Provision C.11.h requires Permittees to conduct an ongoing risk reduction program to address public health impacts of mercury in San Francisco Bay/Delta fish. The fish risk reduction program shall take actions to reduce actual and potential health risks in those people and communities most likely to consume San Francisco Bay-caught fish, such as subsistence fishers and their families. At a minimum, Permittees shall conduct or cause to be conducted an ongoing risk reduction program with the potential to annually reach 3,000 individuals throughout the region who are likely consumers of San Francisco Bay-caught fish. The Permittees shall report on the status of the risk reduction program in each of their Annual Reports and report the findings of the effectiveness evaluation of their risk reduction program in their FY 2025/26 Annual Report.

Program Activities: To comply with this provision, the Program ran a digital campaign to promote awareness of fish consumption health advisories. The ads targeted fishing and outdoor enthusiasts and included Google Display Ads, Facebook, Instagram Reels, YouTube, and streaming video. In addition to digital advertising, a paid article and advertisement in the [Fish Sniffer](#) Online Magazine reached 30,000 readers interested in fishing in California. Fish Sniffer also sent an E-blast to its full subscriber list with Program-only content. Digital ads linked to the Program's [Fishing and Health page](#). The Fish Sniffer ads directed viewers to the State of California's Fishing Advisory page. See the Provision [C.7.a Fishing Advisory Campaign](#) section for details on the effort.

Provision C.12: Polychlorinated Biphenyls (PCBs) Controls

Provisions in C.12 reflect the implementation plan incorporated in the Basin Plan for the San Francisco Bay PCBs TMDL. The MRP 3 Fact Sheet describes a General Strategy for Sediment-Bound Pollutants that progresses from pilot testing of controls in a few specific locations, through focused implementation in areas where benefits are likely to accrue, to full-scale implementation throughout the region were warranted by understanding the effectiveness of each control measure or activity. As noted in the MRP 3 Fact Sheet, the current permit emphasizes specific programmatic control measures deemed effective based on implementation experience and analyses in previous permit terms implementation at full-scale. Permittees may comply with any requirement of this provision through a collaborative effort.

Provision C.12.a: Assess PCBs Load Reductions from Stormwater

Requirement: Provision C.12.a requires Permittees to implement an assessment methodology and data collection program to quantify, in a technically sound manner, PCBs loads reduced through implementation of pollution prevention, source control, and treatment control measures implemented during this permit term.

Program Activities: The *Mercury and PCBs Control Measures – Update 2024* report (Appendix F) provides documentation confirming that control measures implemented during the previous permit term for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction.

Provision C.12.b: Program for Source Property Identification and Abatement

Requirement: Provision C.12.b requires Permittees to investigate 2,620 acres of likely PCBs source properties during the MRP 3 permit term. Permittees shall take action to abate PCBs sources or refer properties to the Water Board for land areas found to be contributing substantial amounts of PCBs or where high PCBs concentrations are found. Permittees shall implement interim enhanced O&M measures for source properties referred to the Water Board.

Program Activities: FY 2023/24, samples were collected in August and September 2023 and May and June 2024. Based on data received from samples collected in August and September 2023, no PCBs source properties were identified as a result of these investigations. Results of samples collected in May and June 2024 are expected in Fall 2024. See the *Mercury and PCBs Control Measures – Update 2024* report (Appendix F) for further details.

Provision C.12.c: Program for Control Measure Implementation in Old Industrial Areas

Requirement: Provision C.12.c requires Permittees to implement, or cause to be implemented, control measures (treatment controls, diversion to wastewater treatment plants, redevelopment (provided GSI implemented in compliance with Provision C.3.b), enhanced O&M controls, or other controls) to comply with the performance metrics in Provision C.12.c.i. Control measures must be implemented within the MRP 3 permit term to treat urban runoff from 664 acres of old industrial areas, areas containing known or suspected source areas, or areas with evidence of moderate to high mercury or PCBs soil concentrations.

Program Activities: To assist Member Agencies in complying with this provision, the Program submitted the *Alameda County Old Industrial Area Control Measure Plan* on March 31, 2023. The plan addressed the requirements of MRP Provisions C.11.c.iii.(1) and C.12.c.iii.(1) for providing a plan and schedule for

focused implementation of control measures in old industrial areas to address mercury and PCBs load reduction requirements. On August 25, 2023, the Water Board sent a letter to the BAMSC stormwater programs stating that the CMPs were not acceptable and required Permittees to remedy the identified shortcomings. To address Water Board comments, ACCWP formed an ad-hoc old industrial CMP workgroup focused solely on CMP revisions. The ad-hoc workgroup was comprised of ACCWP staff and eight permittee representatives. From October 2023, the ad-hoc workgroup met twice with Water Board staff and three times internally.

Over a six-month period, the ACCWP revised the March 2023 Control Measure Plan to address Water Board comments received in August 2023. The *Alameda County Old Industrial Area Control Measure Plan, Version 1.1* was submitted on March 31, 2024. This revised plan includes maps identifying focus areas with known moderate PCBs concentrations and lays out the process by which specific treatment control measures will be assessed and implemented for these focus areas.

The *Mercury and PCBs Control Measures – Update 2024* report (Appendix F) summarizes control measures implemented in old industrial and moderate areas between July 1, 2022 and June 30, 2024, including maps of the areas treated, the acreage of catchments addressed, and a description of the control measures.

Provision C.12.d: Program for Controlling PCBs from Bridges and Overpasses

Requirement: Provision C.12.d requires Permittees to implement a Caltrans specification to manage, as part of bridge and overpass roadway replacement or major repair, potential PCBs-containing material in bridge roadway expansion joints. Permittees shall track the development of the Caltrans specification, develop an inventory of bridges in their jurisdiction, and implement the Caltrans specification during applicable replacement activities.

Program Activities: To assist Permittees with complying with Provision C.12.d, the Program developed a preliminary bridge inventory database in FY2022/23. Also, in FY2022/23, the Program, in collaboration with the BAMSC MPC subcommittee, reviewed and commented on a draft Caltrans SOP for managing PCBs-containing materials during bridge replacement or repair projects. The Caltrans SOP was not a specification, as stipulated in MRP 3 Provision C.12.d.ii. The Program, in collaboration with the BAMSC MPC subcommittee, suggested that Caltrans amend Caltrans Specification 13 Water Pollution Control to establish specifications for use by its contractors to address PCBs in bridge projects that the MRP 3 Permittees could then adopt. The Program tracked the development of the Caltrans specification through shared participation in monthly BAMSC Steering Committee meetings. A Caltrans specification was not made available in FY 2023/24.

Provision C.12.e: Program for Controlling PCBs from Electrical Utilities

Requirement: Provision C.12.e requires Permittees to: (1) develop or improve and implement SOPs to respond to, clean up, and report spills and releases from municipally owned oil-filled electrical equipment (OFEE); (2) develop and implement a plan to maintain and upgrade municipally owned OFEE; (3) document PCBs loads avoided through existing and ongoing OFEE removal and replacement programs; and (4) collaborate with the Water Board to request information from non-municipally owned electrical utilities.

Program Activities: To assist the Permittees with complying with Provision C.12.e, the Program participated in a BAMSC workgroup focusing on municipally owned electrical utility equipment. In FY

2022/23, the workgroup coordinated to develop an enhanced spill response and reporting methodology that each municipal utility will implement, consistent methods for reporting estimates of the total PCBs mass removed from each municipal utility's equipment between 2002 and 2023, and annual documentation of the removal/disposal of PCBs-containing electrical utility equipment for each municipal utility.

In FY 2023/24 the workgroup coordinated on maintenance and upgrades of municipally owned OFEE, and documentation of PCBs loads avoided through existing and ongoing OFEE removal and replacement. See the *Mercury and PCBs Control Measures – Update 2024* report (Appendix F) for further details, including a summary of Alameda Municipal Power's plans to maintain and upgrade OFEE for municipally owned electrical utilities.

Provision C.12.f: Plan and Implement Green Stormwater Infrastructure to Reduce PCBs Loads

Requirement: Provision C.12.f requires Permittees to implement GSI projects consistent with the implementing requirements in Provision C.3.j.

Program Activities: Activities related to implementation of Provision C.3.j are described in the Provision C.3.j GI Planning and Implementation section above.

Provision C.12.g: Manage PCBs-Containing Materials and Wastes During Building Demolition Activities

Requirement: Provision C.12.g requires that Permittees implement their established protocol prior to issuing a demolition permit. Permittees shall ensure construction sites are inspected during demolition and obtain verification that materials from demolished buildings are appropriately disposed. Permittees shall enhance their construction site control program to minimize migration of PCBs into the Municipal Separate Storm Sewer Systems (MS4) from applicable structures containing building materials with PCBs concentrations of 50 parts per million (ppm) or greater during demolition activities. A Permittee is exempt from this requirement if it provided evidence acceptable to the Water Board Executive Officer in its FY 2022/23 Annual Report that the only buildings that existed pre-1980 within its jurisdiction were single-family residential and/or wood-frame buildings.

Program Activities: In FY 2022/23, the Program participated in a BAMSC project of regional benefit to assist Permittees in addressing Provision C.12.g. The *Mercury and PCBs Control Measures – Update 2024* (Appendix F) report also documents the reporting required in Provision C.12.g.iii.(3). No ACCWP Members claimed exemption for this requirement in their FY 2022/23 Annual Report.

Provision C.12.h: Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations

Requirement: Provision C.12.h requires Permittees to update their PCBs control measures implementation plan and RAA as necessary by March 31, 2026.

Program Activities: The Program prepared and submitted the *Alameda County PCBs and Mercury Control Measure Plan and Reasonable Assurance Analysis Report* with the FY 2019/20 Annual Report. No activities related to updating the implementation plan and RAA were conducted in FY 2023/24.

Provision C.12.i: Fate and Transport Study of PCBs: Urban Runoff Impact on San Francisco Bay Margins

Requirement: Provision C.12.i requires Permittees to conduct or cause to be conducted studies concerning the fate, transport, and biological uptake of PCBs discharged from urban runoff to San Francisco Bay margin areas. Permittees shall submit in their FY 2022/23 Annual Reports a workplan describing how these information needs will be accomplished, including the studies to be performed and a preliminary schedule. Permittees are required to report on the status of the studies in their FY 2022/23 Annual Report. The Permittees are required to report the findings and results of the studies completed, planned, or in progress, as well as implications of studies on potential control measures to be investigated, piloted or implemented in future permit cycles in the March 2026 IMR.

Program Activities: The Program submitted a workplan and status in their FY 2022/23 Annual Report on studies concerning the fate, transport, and biological uptake of PCBs discharged from urban runoff to San Francisco Bay margin areas. The Program will report on the findings and results of the studies in the March 2026 IMR.

In addition, BAMSC representatives will continue to participate in the RMP PCBs Workgroup to help oversee this work and guide it towards developing information that will inform implementing controls for mercury and PCBs in stormwater runoff and reducing the San Francisco Bay's impairment by these pollutants.

Provision C.12.j: Implement a Risk Reduction Program

Requirement: Provision C.12.j requires Permittees to conduct an ongoing risk reduction program to address public health impacts of PCBs in San Francisco Bay/Delta fish. The fish risk reduction program shall take actions to reduce actual and potential health risks in those people and communities most likely to consume San Francisco Bay-caught fish, such as subsistence fishers and their families. At a minimum, Permittees shall conduct or cause to be conducted an ongoing risk reduction program with the potential to annually reach 3,000 individuals throughout the region who are likely consumers of San Francisco Bay-caught fish. The Permittees shall report on the status of the risk reduction program in each of their Annual Reports and report the findings of the effectiveness evaluation of their risk reduction program in their FY 2025/26 Annual Report.

Program Activities: To comply with this provision, the Program ran a digital campaign to promote awareness of fish consumption health advisories. The ads targeted fishing and outdoor enthusiasts and included Google Display Ads, Facebook, Instagram Reels, YouTube, and streaming video. In addition to digital advertising, a paid article and advertisement in the [Fish Sniffer](#) Online Magazine reached 30,000 readers interested in fishing in California. Fish Sniffer also sent an E-blast to its full subscriber list with Program-only content. Digital ads linked to the Program's [Fishing and Health page](#). The Fish Sniffer ads directed viewers to the State of California's Fishing Advisory page. See [Section C.7.a Fishing Advisory Campaign](#) for details on the effort.

Provision C.15: Exempted and Conditionally Exempted Discharges

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

Requirement: Provision C.15.b.iii requires Permittees to collectively convene a regionwide Firefighting Discharges Working Group to identify and evaluate opportunities to reduce the impacts of emergency discharges to the MS4 associated with firefighting activity. The Permittees shall collectively submit, by September 30, 2025, a Firefighting Discharges Report that describes progress on, and recommendations regarding, the implementation of the items listed in Provision C.15.b.iii.(2)(a)(i)-(vii). Permittees shall implement the recommendations from the Firefighting Discharges Report, ensure proper BMPs and SOPs are included in contracts for non-municipal staff hired by Permittees to assist with containment and cleanup, and Permittees shall evaluate the adequacy of large industrial sites' BMPs and SOPs for the prevention, containment, and cleanup of emergency firefighting discharges into storm drains and receiving waters.

Program Activities: The Program surveyed the IIDC Subcommittee and Management Committee for stormwater program and fire department representatives interested in participating in the BAMSC Regional Firefighting Discharges Work Group. The Program and representatives from ACCWP Member stormwater programs and fire departments actively participated in the FY 2022/23 Work Group meetings. The Work Group developed a project profile for a BAMSC project of regional benefit. The project profile outlined the tasks and schedule to develop the Regional Firefighting Discharges Report for FY 2023/24 and FY 2024/25. ACCWP provides in-kind services for the development of the Regional Report, and Program representatives participate in the Regional Work Group.

In FY 2023/24, Program representatives organized and participated in the March 26 and June 17, 2024, Work Group meetings. In addition, Program representatives organized and attended two Task Force meetings. The Task Force is a smaller, working group that provides guidance for developing the Work Group agendas.

The Program provided information on the Work Group activities to the IIDC Subcommittee and Management Committee. The IIDC Subcommittee discussed the requirement to evaluate the adequacy of large industrial facilities' BMPs and SOPs for the prevention, containment, and cleanup of emergency firefighting discharges into storm drains and receiving waters. The Subcommittee discussed how to define the "large industrial sites such as Industrial General Permit sites, gas plants, gas concentration facilities, and chemical plants" identified in the MRP. The Program provided a table of suggested Standard Industrial Classification (SIC) codes that would capture gas plants, gas concentration facilities, and chemical plants as specified in the MRP and the specific industrial facilities with these SIC codes in ACCWP Member jurisdictions. The Subcommittee discussed the types of industrial facilities that should be addressed, size thresholds, and inspections and/or documentation that may already be available.

Provision C.15.b.iv: Individual Residential Car Washing

Requirement: Provision C.15.b.iv requires the Permittee to discourage, through outreach efforts, individual residential car washing discharges into the storm drain system. It also requires Permittees to encourage individuals to direct car wash water to landscape, use as little detergent as necessary, or wash cars at commercial car wash facilities.

Program Activities: To assist Member Agencies in complying with this provision, the Program provides outreach materials and information on proper car washing for residents posted on the Program's Car

Care [webpage](#). The Program promotes two car wash videos featuring the Program's mascots Fred and Izzy: one is a shorter ad for broadcast TV, and one is a longer video for digital promotion, including versions in Chinese and Spanish. A [video](#) discouraging hosing off driveways and other impervious surfaces is also available in English, Spanish, and Chinese.

Provision C.15.b.v: Swimming Pool, Hot Tub, Spa, and Fountain Water Discharges

Requirement: Provision C.15.b.v requires Permittees to prohibit polluted discharges from pools, hot tubs, spas, and fountains; provide public outreach; allow discharges to the storm drain system only if there are no other alternatives and proper BMPs are implemented; require new facilities to have a connection to the sanitary sewer; and implement illicit discharge program Enforcement Response Plans to address polluted discharges from these facilities.

Program Activities: To assist Member Agencies in complying with this provision, the Program provides the *Proper Disposal of Wastewater: Don't Drain Pools, Spas and Fountains to Storm Drains* Tip Sheet on the Program [website](#), under the Drain Pools, Spas, and Fountains to Sanitary Sewers header.

Provision C.15.b.vi: Irrigation Water, Landscape Irrigation, and Lawn or Garden Watering

Requirement: Provision C.15.b.vi. requires Permittees to promote measures that minimize runoff and pollutant loading from excess irrigation.

Program Activities: To assist Member Agencies in complying with this provision, the Program implements countywide outreach efforts through the New and Redevelopment program Public Information and Outreach program, and Pesticide Toxicity Control program. These efforts are discussed in those sections of the Annual Report.

Additional Activities

Compliance with the conditionally exempt discharge categories, specifically pumped groundwater, foundation drains, water from crawl space pumps, and footing drains, are also discussed at the IIDC Subcommittee meetings. As mentioned in the C.4 Industrial and Commercial Site Controls section of this report, there were four meetings held this FY, and the focus of the meetings is to share information on MRP 3 compliance and activities, including conditionally exempt discharges that stormwater inspectors may encounter. The Public Information and Participation Subcommittee also addresses outreach and education for several of the conditionally exempt discharge categories.

Provision C.17: Discharges Associated with Unsheltered Homeless Populations

Requirement: Provision C.17 requires Permittees to individually and collectively identify and ensure the implementation of appropriate control measures to address non-stormwater discharges into MS4s associated with unsheltered homeless populations. At the individual level, Permittees are required to implement and evaluate the effectiveness of BMPs, map locations of unsheltered populations, and work together with Permittees and other stakeholders at the countywide and regional levels. As defined in MRP 3, unsheltered population areas are where unsheltered people congregate (e.g., formal and informal encampments including, but not limited to, informal tent or small cabin encampments, areas where people living in vehicles park, and safe parking areas).

Summary of Program Activities: The Program convened an ACCWP C.17 Work Group in FY 2022/23 to provide reporting guidance, assist with development of maps, and coordinate with the BAMSC Regional C.17 Work Group on development of the Regional BMP Report (September 2023). The ACCWP Work Group did not meet in FY 2023/24.

Provision C.17.a.ii.(1): Unsheltered Homeless Population Map

Requirement: Provision C.17.a.ii.(1) requires each Permittee to submit a map with the FY 2022/23 and FY 2024/25 Annual Reports identifying, within its jurisdiction, the approximate locations of unsheltered homeless populations, including homeless encampments and other areas where other unsheltered homeless people live. Each map shall identify those location(s) in relation to storm drain inlets and existing streams, rivers, flood control channels, and other surface water bodies within the Permittee's jurisdiction.

Program Activities: To assist each Permittee with the mapping requirement and provide consistency, the ACCWP C.17 Work Group recommended utilizing data from existing work done by the Alameda County Office of Homeless Care and Coordination (OHCC) in their Point-in-Time (PIT) Count. As required by the U.S. Department of Housing and Urban Development (HUD) of all communities receiving federal funding to provide homeless services, Alameda County Continuum of Care Program reports the findings of their local point-in-time counts to HUD. Alameda County, its providers and cities, and the State of California all use their PIT Count data for various fundraising, modeling for bringing the system to scale, planning, funding allocations, and expanding housing and services to meet the needs and make improvements. In the Alameda County PIT Count, the HUD definition of homelessness was used. This definition includes individuals and families:

- Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements; or
- With a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

The PIT Count represents a complete enumeration of all sheltered and unsheltered persons experiencing homelessness and a few safe parking programs for Recreational Vehicles that met HUD's definition of a sheltered location in new guidance issued for the PIT Count.

The Program, through the ACCWP C.17 Work Group, the Policy Subcommittee, and the Management Committee, coordinated with the OHCC's staff to acquire the GIS data pertaining to the PIT Count and

created maps for each Permittee to include in their individual FY 2022/23 Annual Reports. The most recent OHCC PIT Count took place in January 2024. While preliminary summary data is available, the final report won't be released until later in the year. Once the OHCC releases the final report the Program will coordinate with OHCC's staff to acquire the 2024 PIT Count data to update maps for Permittees to include in their FY 2024/25 Annual Reports.

Provision C.17.a.ii.(2): Programmatic Efforts

Requirement: Provision C.17.a.ii.(2) requires each Permittee to report on the programmatic efforts being implemented within their jurisdiction, or at the countywide or regional level, to address MS4 discharges associated with homelessness. To encourage ongoing regional, countywide, and municipal coordination efforts, Permittees are required to collectively develop a BMP report that identifies effective practices to address non-storm water discharges associated with homelessness into MS4s that impact water quality.

Program Activities: The Program coordinated with BAMSC and others (e.g., Caltrans, County and City housing departments/divisions) to develop the *Regional BMP Report for Addressing Non-Stormwater Discharges Associated with Unsheltered Homeless Populations* (Regional BMP Report) that documents programmatic efforts done by Permittees.

The BAMSC Regional BMP Report was collectively prepared by a BAMSC Work Group with representatives from ACCWP, CCCWP, San Mateo Countywide Water Pollution Prevention Program, SCVURPPP, and Solano Stormwater Alliance and individual cities, counties, and special districts in Alameda, Contra Costa, San Mateo, Santa Clara, and Solano Counties regulated by MRP 3. The Work Group also reached out to homeless service provider agencies, Caltrans, and other partner agencies in the development of this Regional BMP Report.

The Regional BMP Report describes the BMPs that may be, or are currently being, implemented by Permittees to address discharges associated with homelessness impacting water quality. Each BMP is presented as a Fact Sheet in the Regional BMP Report. Each Fact Sheet describes the BMP, its goals, limitations, and challenges, and provides local implementation examples. The MRP 3 also requires that the Regional BMP Report identify regional and/or countywide efforts and strategies that also help to meet clean water needs, and actions taken during the COVID-19 pandemic that may have reduced discharges associated with homelessness. These categories of actions are specifically identified in the BMP Fact Sheets. The Regional BMP Report was finalized and included in the September 30, 2023, ACCWP Annual Report.

To meet the broader goal of coordination regionally, and statewide, BAMSC members coordinate with CASQA and San Diego State University staff on a panel presentation at the CASQA Annual Conference on September 13, 2023. The title of the session was "Unhoused Populations and Water Quality Impacts: Municipal Best Management Practices From the Bay Area and San Diego." Panelists included Megan Welsh Carroll, PhD, from San Diego State University; Vishakha Atre from EOA; and Nicole Wilson from Larry Walker Associates, with moderator, Peter Schultze-Allen from EOA representing BAMSC members, including ACCWP. The full-capacity session included an excellent discussion with audience members on the challenges of providing cost-effective municipal services for unhoused populations and the related public health, sanitation, and human rights issues.

Provision C.17.a.ii.(3): Implement BMPs

Requirement: Provision C.17.a.ii.(3) requires Permittees to identify and implement appropriate BMPs to

address MS4 discharges associated with homelessness that impact water quality, including those impacts that can lead to public health impacts. To address water quality impacts from discharges associated with unsheltered homeless populations, Permittees need to evaluate the specific occurrence and/or location involved and implement appropriate BMPs.

Program Activities: To assist each Permittee and as required by MRP 3 Provision C.17.a.i.(2), the Program worked with the ACCWP C.17 Work Group to create guidance regarding effectiveness evaluation in the FY 2022/23 Annual Report Template. The BMPs implemented to address water quality issues in the short term can supplement longer term measures by municipalities to address unsheltered homelessness, such as providing housing and supportive services. The ACCWP C.17 Work Group will be reconvened in FY 2024/25 to update guidance for Permittees reporting their effectiveness evaluation in the FY 2024/25 Annual Report.

Provision C.20: Cost Reporting

Provision C.20.b.i: Cost Reporting Framework and Methodology

Requirement: Provision C.20.b.i requires Permittees to develop a cost reporting framework and methodology to perform the fiscal analysis. Permittees are encouraged to collaboratively develop the framework and methodology. The framework shall consider identification of costs incurred solely to comply with the MRP 3 requirements as listed in Provision C.20.b.(iii) as compared to costs shared with other programs or regulatory requirements, provide meaningful data to assess costs of different program areas, and allow for comparisons and to identify trends over time.

Program Activities: The Program, along with the other countywide stormwater programs, provided in-kind support to a BAMSC project of regional benefit to collectively develop a cost reporting framework and methodology. Permittees submitted the *Final Bay Area Cost Reporting Framework and Guidance Manual* (Framework and Guidance Manual) to the Water Board on June 26, 2023, and Water Board staff provided comments on August 11, 2023.

The BAMSC Regional Cost Reporting Work Group held one meeting in FY 2023/24, which focused primarily on reviewing the Water Board's comments on the final Framework and Guidance Manual. Representatives of the Program and Cities of Fremont and Dublin participated in the Regional Work Group.

In March 2024, the Permittees completed revisions to the framework based on Water Board comments and submitted the revised final Framework and Guidance Manual. On June 26, 2024, the Water Board provided conditional approval for the revised final Framework and Guidance Manual. The condition of approval was that any future modifications, either for better alignment with Permittee accounting practices or for consistency with the State Water Board's Municipal Stormwater Cost Policy, must be approved by the Water Board's EO.

The Program held a Cost Reporting Training Workshop for ACCWP Members on May 8, 2024. The first part of the workshop included review of the MRP requirements, approach to cost reporting, structure and overview of the Framework and Guidance Manual, and annual reporting. The second part of the workshop presented a demonstration of the Framework Tool. In addition, the Program developed an ACCWP-specific Cost Reporting Framework Tool that included the ACCWP FY 2024/25 budgets for the different program areas and contribution percentages for ACCWP Members but was otherwise consistent with the revised version submitted to the Water Board in March 2024.

Future activities include Permittees' use of the approved Framework and Guidance Manual to track and report costs of implementing MRP requirements, beginning in FY 2024/25. Permittees will make the necessary adjustments to internal personnel cost budgeting and/or tracking systems in order to use the Framework. The FY 2024/25 cost analysis will be submitted with the FY 2024/25 Annual Report in September 2025.

Provision C.21: Asset Management

Provision C.21.b: Asset Management Plan

Requirement: Provision C.21.b requires Permittees to develop and begin implementation of an Asset Management Plan in order to ensure the satisfactory condition of all hard assets constructed during this and previous Permit terms. The Asset Management Plan must be developed and begin implementation by June 30, 2025, and be reassessed and updated on an as-needed basis. Permittees must also complete a Climate Change Adaptation Report to identify potential climate change-related threats to assets and appropriate adaptation strategies. The Climate Adaptation Report shall be submitted with the FY 2025/26 Annual Report.

Program Activities: In FY 2023/24, the Program formed an ACCWP Asset Management Work Group to help guide ACCWP Members in the development of asset management plans. The Work Group met three times during the FY. Participants in the ACCWP Work Group included representatives from the Program, Alameda County, and the Cities of Berkeley, Dublin, Fremont, Livermore, Newark, Oakland, and Piedmont. ACCWP Members received a presentation on asset management background, requirements, and approach. In addition, the Program compiled and distributed resources for ACCWP Members to reference with the development of their asset management plans.

The Program also developed a draft guidance framework for ACCWP Members to use to develop their asset management plans. The Program ultimately reconfigured the framework to a template format at the request of the Work Group, so that the document could be used more effectively for the development of Permittee Asset Management Plans. An annotated outline of the template was reviewed and approved by the Work Group and will continue to be populated and discussed with the Work Group in FY 2024/25.

The Program and several ACCWP Members also participated in the BAMSC Asset Management Work Group which was formed for permittees to collaborate and share resources. During FY 2023/24, the BAMSC Work Group focused primarily on discussing regionally consistent approaches for assessing the condition of assets, which Permittees may take into consideration and/or implement as part of their Asset Management Plans. The BAMSC Work Group received presentations from San Francisco Public Utilities Commission and City of San Jose on each municipality's experiences with assessing the condition of GI-related assets, utilizing maintenance guidance documents that they developed. The Program provided updates to the ACCWP Asset Management Work Group on outcomes and materials from the BAMSC Work Group meetings.

Appendix A

Municipal Maintenance Workshop Materials and Evaluation

Municipal Maintenance Post Workshop Report

Municipal Maintenance Workshop Agenda

Municipal Maintenance Workshop Flyer



**2023 ACCWP Municipal Maintenance Workshop
EVALUATION FORM**

Total Attendees – 72

Number of Agencies - 11

How many maintenance workshops have you attended (circle one)

1 (21) 2 (11) 3 (8) 4 (1) 5 (1) 6+ (8)

What did you think of the following presentations and activities?

1. Stormwater Best Management Practices Refresher

Very Helpful **40**

Somewhat Helpful **14**

Not Helpful **0**

Comments _____

2. Using the Trash Collector App

Very Helpful **30**

Somewhat Helpful **14**

Not Helpful **1**

Comments _____

3. Lessons Learned from the 2022 – 2023 Storms

Very Helpful **45**

Somewhat Helpful **3**

Not Helpful **0**

Comments _____

4. Field Demonstration and Vendors

Very Helpful **44**

Somewhat Helpful **3**

Not Helpful **0**

Comments _____

Did this workshop meet your expectations? 49 Yes 0 No

Comments?

2023 Municipal Maintenance Workshop Evaluation Comments

Stormwater Best Management Practices Refresher

1. Importance of public works
2. Prep early and often
3. Nice to know how important our job is! And keeps improving!
4. Good information on how other cities operate and how important our jobs are to the environment
5. Very Helpful. Tons of key issues addressed.

Trash App

1. Add notes on condition and what has been to date
2. Add different design pins for D.I.s that need attention so you can see on full map what Di's need to come back to and service without having to remember what DI.
3. Great App.
4. Looks easy to use but ours needs updating.
5. From my point of view it seems the "App" is for those that are taking account. It does help if you're not sure.
6. Good App to keep track of progress and is good for preventing floods.
7. These trash collectors are a very good resource.
8. Couldn't see or hear the presentation
9. We could use someone to come on sight to help us with this APP – Union City

Lessons Learned

1. Proactivity and being prepared for storms / maintaining hot spots. Communicate with others.
2. Very helpful to see what other cities use/do during storm season.
3. Have a team to call.
4. Showing major causes of what happened and what can occur for future notice. Being prepared is key.
5. The presentation was very informative, and pictures of the floods gave a good perspective on everything that happened.
6. Make sure you are prepared for the storm year.
7. Very insightful to hear other cities experiences (bad or good) that have led to safe and effective solutions towards clearing our flooding issues based by clogged storm drains and waterways.

Vendors and Demonstrations

1. Jetter nozzles very helpful. Sizes vs. GPM / pressure	6. Owens very informative
2. Good lineup of equipment	7. The vendors are good contact information
3. Very helpful to see all the equipment in use. Very helpful to see new technology.	8. Good Demos
4. Excellent / prepared!	9. Always nice to see new, improved equipment to help and do our jobs more safely.
5. Nice to see the nozzle demo	10. Vendors answered all the questions.

Other

1. Workshop very much met my expectations. What to look for, how to prepare, staying informed. Vendors were well prepared, and the equipment looked great and ready to go.	4. Info well put together
2. Look forward to more workshops.	5. This was incredibly well put together
3. Very instructional	6. Really enjoyed it. Need more like this
	7. Very informative
	8. Great presentations and demos.
	9. Very helpful



October 18, 2023
8:30 AM – 1:00 PM
Fremont Corporation Yard
[42551 Osgood Road, Fremont](https://www.fremontca.gov/42551/Osgood-Road-Fremont)

Municipal Maintenance Workshop Agenda

Check-in and Refreshments		8:30-9:00
Introductions	Mike Wells City of Livermore	9:00-9:10
Stormwater Best Management Practices Refresher	Steve Aguiar City of Livermore	9:10-9:20
Using the Trash Collector App	Keith Palmer PSOMAS	9:20-9:45
Lessons Learned from the 2022-23 Storms	Mike Wells City of Livermore	9:45-10:05
	Paul Roman Union City	
Introduction to Field Demonstrations	Mike Wells City of Livermore	10:05-10:15
BREAK		10:15-10:25
Field Demonstrations and Vendors		10:25-11:45
Lunch and Raffle		12:00 – 1:00
Closing Remarks and Questions	Mike Wells City of Livermore	

SAVE THE DATE

Municipal Maintenance Workshop



OCTOBER 18, 2023
8:30AM TO 1:00PM

City of Fremont Corporation Yard
42551 Osgood Road, Fremont

Training Highlights:

- * Stormwater Best Management Practices
- * 2022/23 Raining Season - Lessons Learned
- * Using the Trash Collector App
- * Equipment Demonstrations
- * Vendor and Equipment Show



Morning Refreshments and Lunch Provided

There is no fee for this workshop

Please share this flyer with the appropriate staff in your organization

Certificate for Training Provided



Appendix B

New Development and Redevelopment Controls

*Bay Area Hydrology Model (BAHM) Rainfall Data Documentation
Regional Supplement for New Development and Redevelopment*



CLEAR CREEK SOLUTIONS, INC.

6200 Capitol Blvd SE Suite F
Tumwater, WA 98501
360-943-0304
www.clearcreeksolutions.com

DATE: 21 June 2024
TO: Jill Bicknell
CC:
FROM: Joseph T. Brascher
SUBJECT: BAHM 2023 Rain Gage Data Revision

Introduction

It was brought to Clear Creek Solutions' attention that there were identified discrepancies regarding rainfall data utilized in the BAHM 2023 software. The rain gages with errant data were analyzed and corrected to better represent the historic rainfall pattern for the region. Updating the rainfall data for BAHM 2023 from BAHM 2013 presented many challenges, due to many discontinued or inaccurate rain gages. The revised changes made for various rain gages are described in this document. These changes will create a more accurate picture of the historic rainfall in the various counties and regions.

Very Truly Yours,

Joseph T. Brascher
President/C.E.O.
Clear Creek Solutions Inc.

There are currently six rainfall gages representing the three original counties (Alameda, Santa Clara and San Mateo) in the Bay Area Hydrology Model (BAHM) and seven rainfall gages represented Contra Costa County.

Alameda County has three rainfall gages:

1. Newark – 1948 - 2022
2. Berkeley – 1948 – 2022
3. Livermore – 1948 – 2022

The original gages used to develop the rainfall time series for each of the three gages were discontinued in 2013. New, suitable, nearby gages were located and used to extend the rainfall times series from 2013 to 2022

Newark

The closest, appropriate gage to the Newark gage is the San Jose gage. The location of The San Jose gage is shown in Figure 1 below:

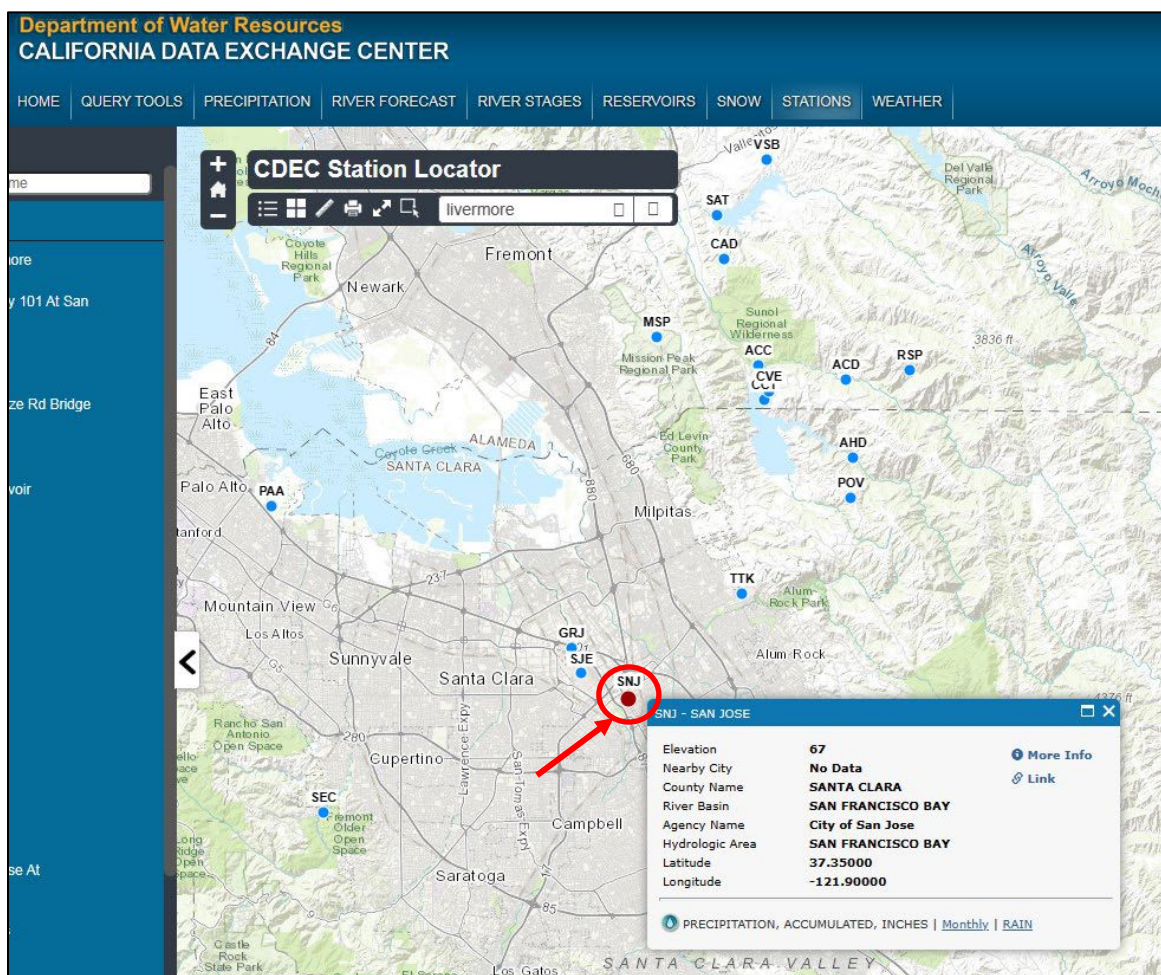


Figure 1. California Data Exchange Center – San Jose Gage Location

The annual average rainfall depths for Newark and San Jose from 1948 to 2003 are 14.3 inches and 15.2 inches respectively. The San Jose rainfall data for 2014 to 2022 was scaled by a factor of 0.944 and then added to the Newark data. A plot of the data is shown in Figure 2 below:

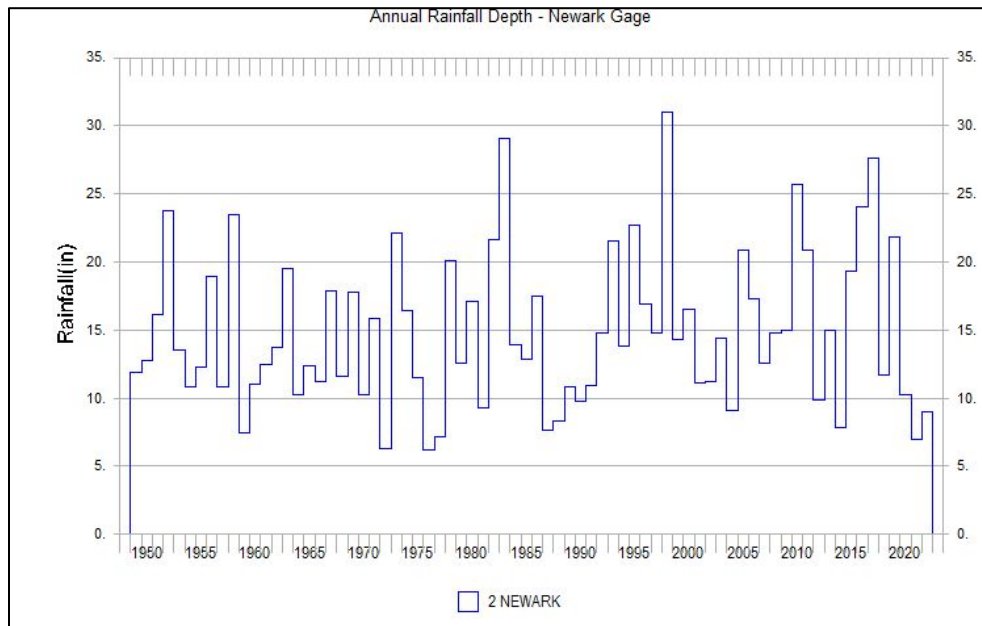


Figure 2. Annual Rainfall Depth – Newark Gage with Scaled San Jose Data.

The resultant annual average rainfall depth for the period 1948 to 2022 is 14.86 inches.

Berkeley

The gage used to provide the original data for the Berkeley gage is no longer in operation. The closest, appropriate gage to the original Berkeley Gage is the Tilden Park (TLD) gage. The location of The Tilden Park gage is shown in Figure 3 below:

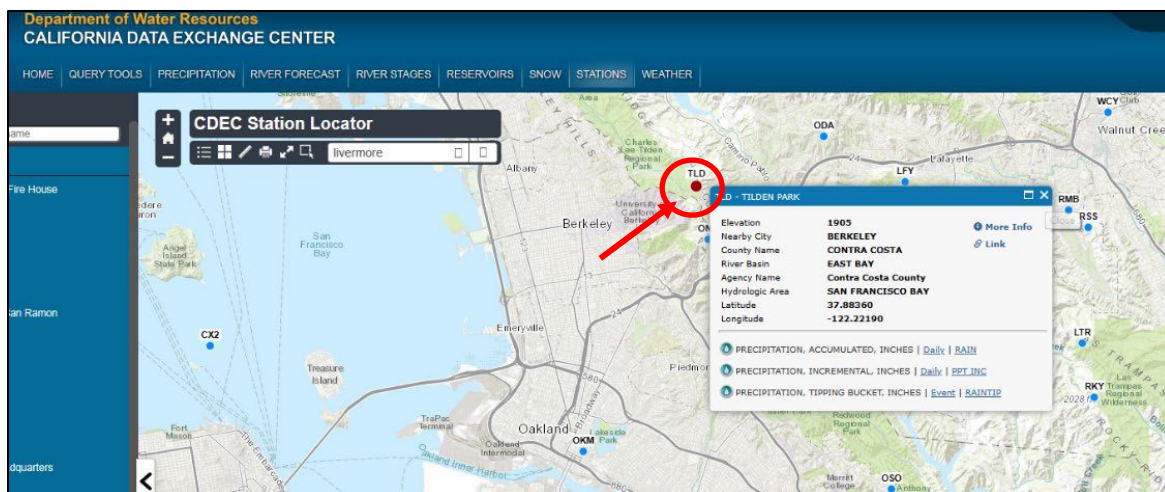


Figure 3. California Data Exchange Center – Tilden Park Gage Location

The annual average rainfall depths for the original Berkeley gage from 1948 to 2004 is 22.81 inches. The TLD gage is located at a higher elevation than the original Berkeley gage and demonstrates a higher average annual rainfall total as a result. The average annual rainfall depth for the TLD gage from 2005 to 2022 is 35.01 inches. This is 1.55 times larger than the original data. The TLD data from 2005 to 2022 was scaled by a factor of 0.667 and then added to the original Berkeley data. A plot of the data is shown in Figure 4 below:

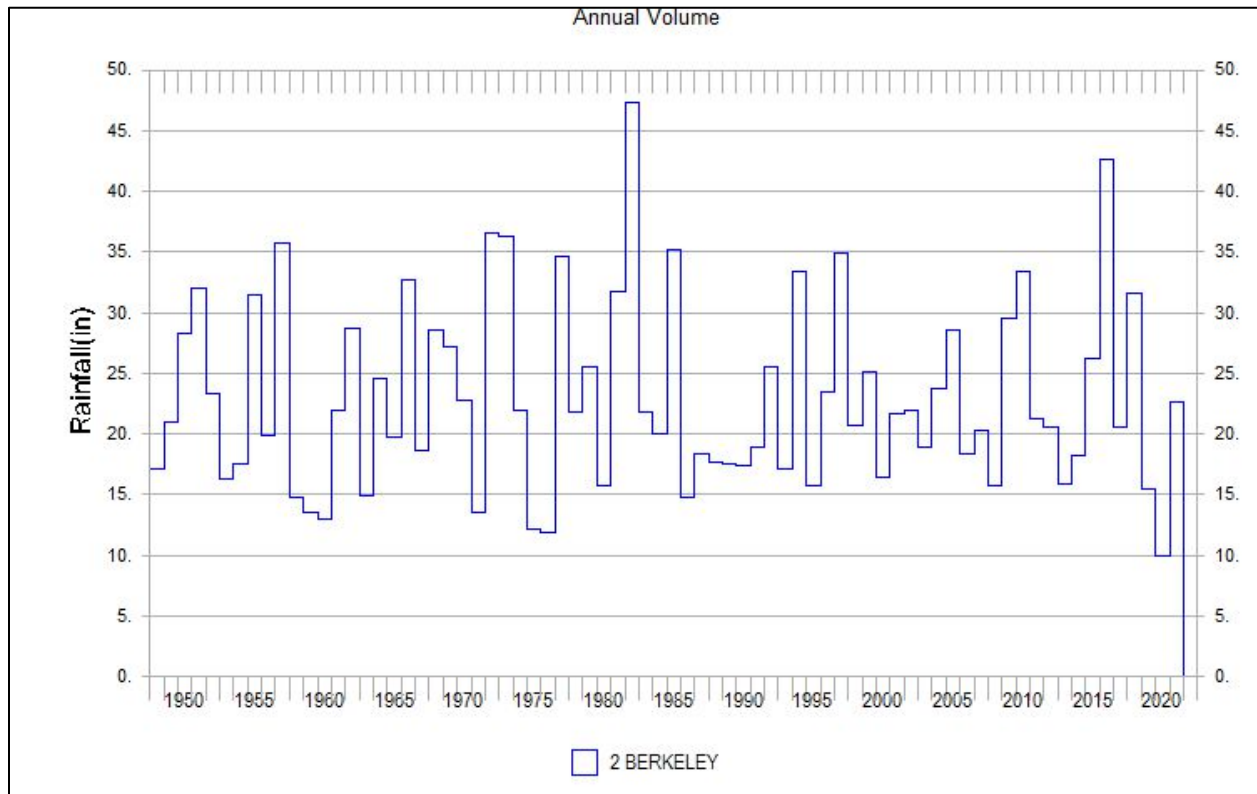


Figure 4. Annual Rainfall Depth – Berkeley Gage with Scaled Tilden Park Data.

The resultant annual average rainfall depth for the period 1948 to 2022 is 23.03 inches.

Livermore

The gage used to provide the original data for the Livermore gage is no longer in operation. The closest, appropriate gage to the original Livermore gage is the Livermore Municipal Airport gage. The location of Livermore Municipal Airport gage is shown in Figure 5 below:

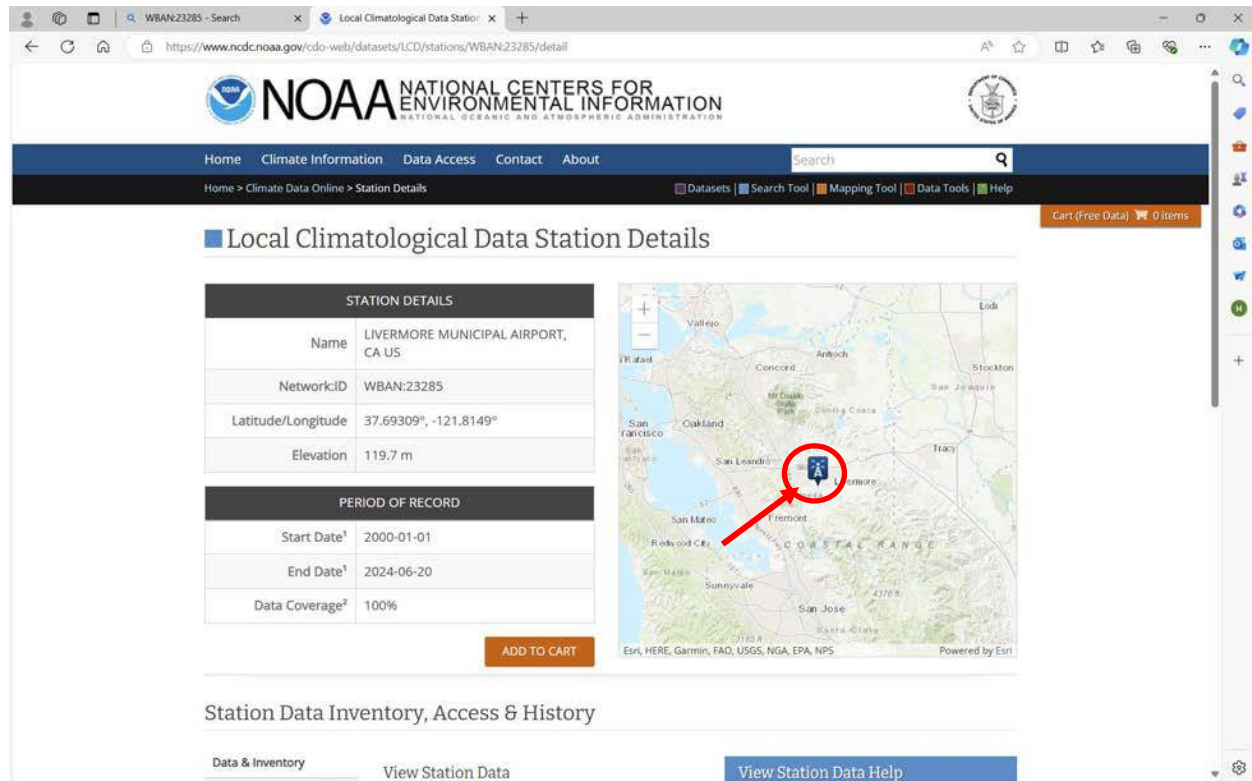


Figure 5. California Data Exchange Center – Livermore Municipal Airport Gage Location

The annual average rainfall depth for the Livermore gage in the BAHM2013 model from 1948 to 2004 is 14.86 inches. The annual average rainfall depth for the Livermore Municipal Airport gage from 2005 to 2022 is 21.44 inches. This is a significant increase in annual average depth. Because of this it is necessary to scale the Livermore Municipal Airport gage by a factor of 0.693 to be more in line with the existing gage data. A plot of the data is shown in Figure 6 below:

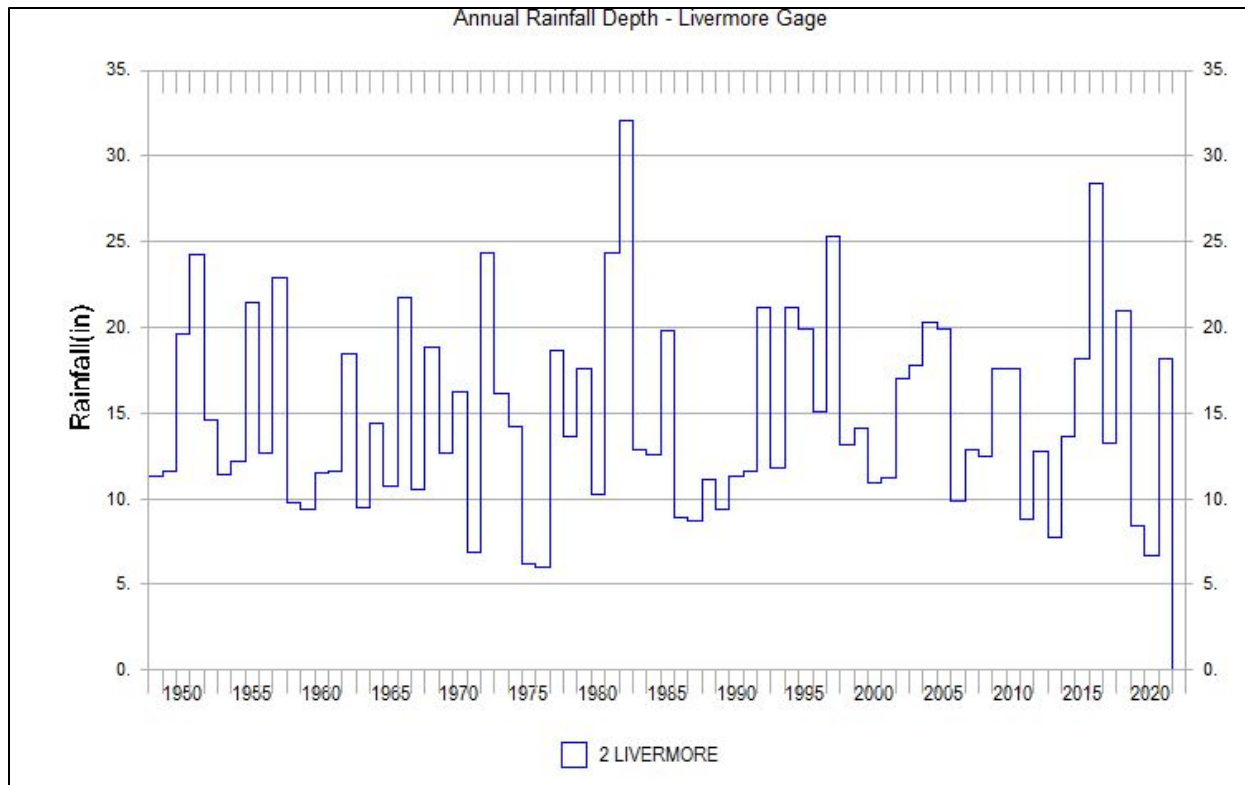


Figure 6. Annual Rainfall Depth – Livermore Gage with Scaled Livermore Municipal Airport Gage Data

The resultant annual average rainfall depth for the period 1948 to 2022 is 14.86 inches.

Santa Clara County has two rainfall gages:

1. San Jose – 1948 – 2022
2. Morgan Hill – 1948 - 2022

The original gage used to develop the rainfall time series for San Jose is still in operation and was used to extend the San Jose data. The original gage used for Morgan Hill is no longer in operation and the San Jose gage was used to extend the rainfall times series.

San Jose

The location of The San Jose gage is shown in Figure 7 below:

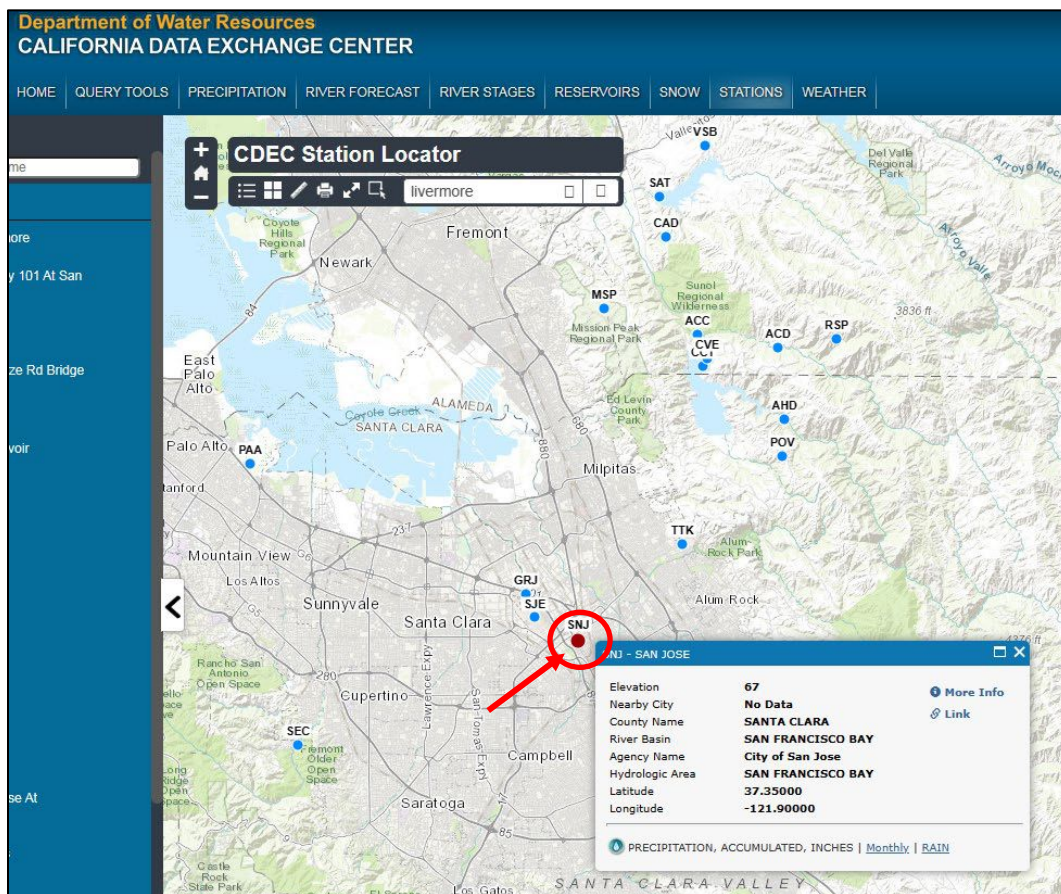


Figure 7. California Data Exchange Center – San Jose Gage Location

The annual average rainfall depths for San Jose from 1948 to 2003 is 15.2 inches. The annual average rainfall depths for San Jose from 2004 to 2022 is 17.1 inches. A plot of the data is shown in Figure 8 below:

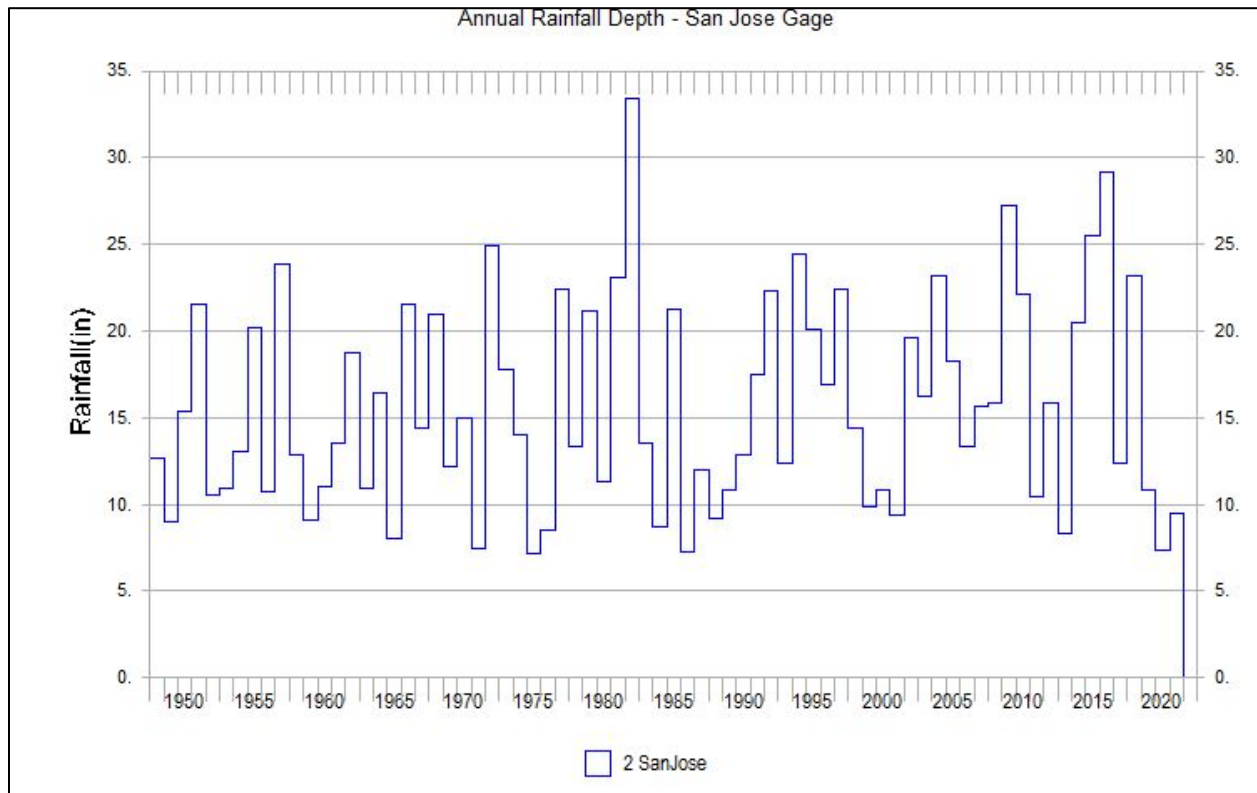


Figure 8. Annual Rainfall Depth – San Jose Gage.

The annual average rainfall depth for the period 1948 to 2022 is 15.64 inches.

Morgan Hill

The gage used to provide the original data for the Morgan Hill gage was discontinued in 2014. The closest, appropriate gage to the original Morgan Hill Gage is the San Jose gage. The location of The Morgan Hill gage and the San Jose gage are shown in Figure 9 below:

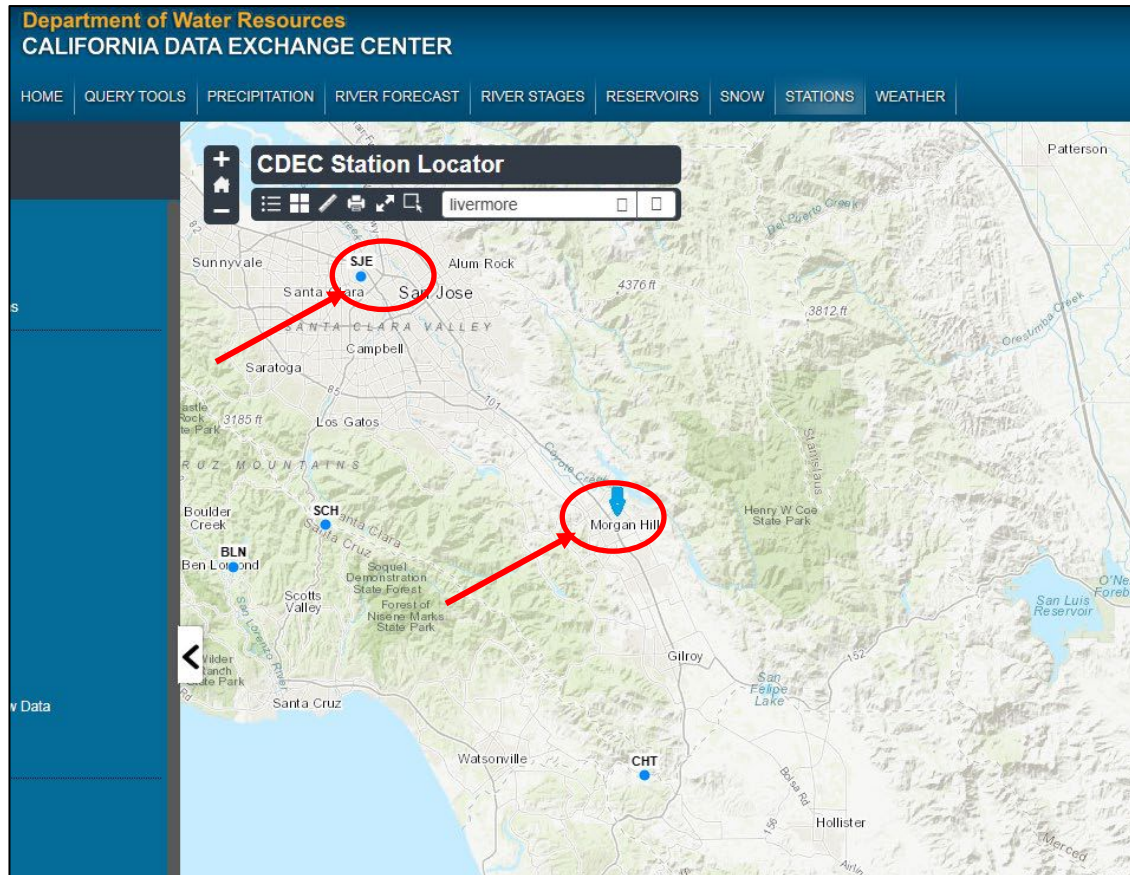


Figure 9. California Data Exchange Center –San Jose Gage with Morgan Hill Gage Location.

The annual average rainfall depths for the original Morgan Hill gage from 1948 to 2004 is 13.9 inches. The annual average rainfall depths for the original Morgan Hill gage from 2004 to 2013 is 18 inches. The combined average annual rainfall depth for the Morgan Hill gage from 1948 to 2013 is 14.47 inches. The annual average rainfall depths for the San Jose gage from 1948 to 2013 is 15.44 inches. The San Jose rainfall data from 2014 to 2022 was scaled by a factor of 0.94 and then added to the original Morgan Hill data. A plot of the data is shown in Figure 10 below:

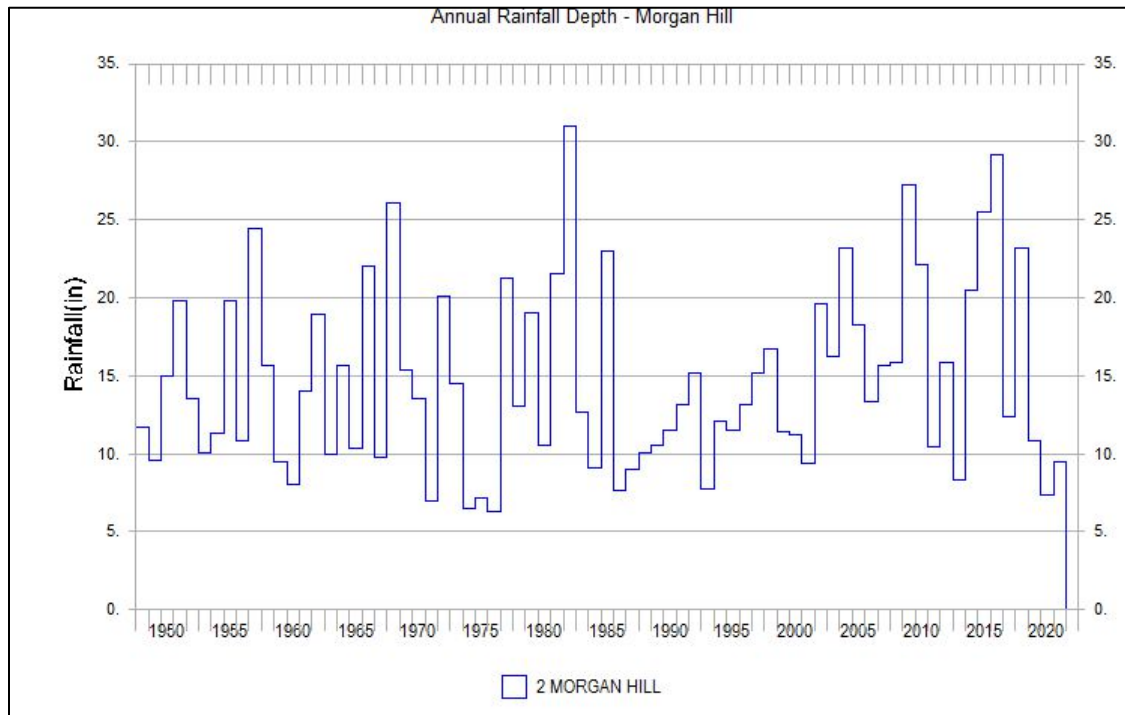


Figure 10 - Annual Rainfall Depth – Morgan Hill Gage with Scaled San Jose Data.

The resultant annual average rainfall depth for the period 1948 to 2022 is 14.7 inches.

San Mateo County has one rainfall gage:

1. San Francisco – 1948 – 2022

The original gage used to develop the rainfall time series for the San Francisco gage was the San Francisco Airport gage (SFO). When comparing the data in the model with the posted data available for the San Francisco gage, the data did not match exactly. Both the previous gage data used in the BAHM2013 model, and the updated data retrieved from the California Data Exchange website are supposed to be from the San Francisco Airport gage. The newly downloaded data for the SFO gage was used in its entirety to represent the San Francisco Airport gage in the BAHM2023 model. The average annual rainfall depth of the original SFO gage is 19.5 inches. The resultant average annual rainfall depth for the updated full length of record from 1948 to 2022 for the SFO gage is 19.0 inches. The location of The San Francisco gage is shown in Figure 11 below:

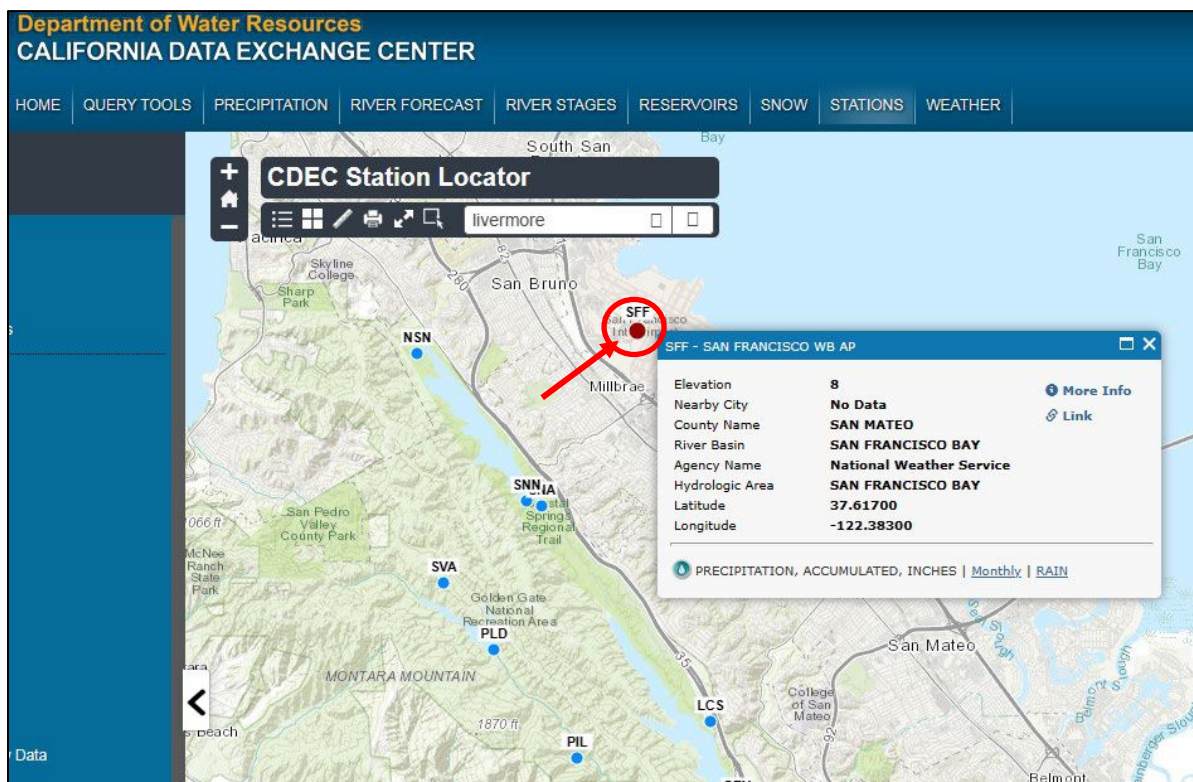


Figure 11. California Data Exchange Center – San Francisco Gage Location.

A plot of the data is shown in Figure 12 below:

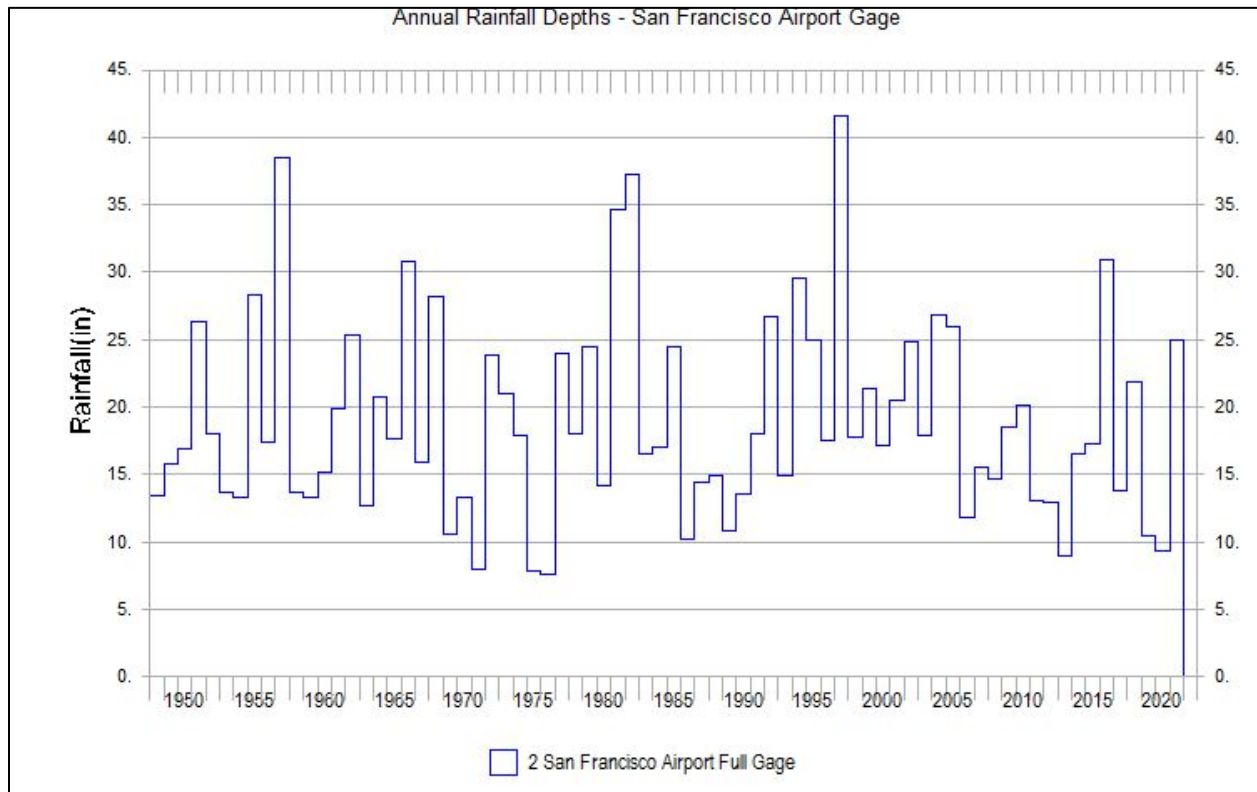


Figure 12 - Annual Rainfall Depth – San Francisco Gage.

Contra Costa Rainfall Gages

There are currently seven rainfall gages representing Contra Costa County in the Bay Area Hydrology Model (BAHM). The original data was obtained from previous Contra Costa County regional modeling efforts and added to the BAHM. For this effort, the seven gages were updated through water year 2021. All seven gages were still in operation, so there was no major requirement to fill and scale data. Minor gaps in data existed for each gage and were filled by a nearby gage. Gaps ranged from a few hours to a few days and had no real impact on the overall data. The Contra Costa rainfall gages are listed in Table 1 below:

Table 1: Contra Costa Rainfall Gages.

Gage	Label	Notes
Dublin Fire	DBF	Dublin Fire Station – 1973 - 2021
Orinda Fire District	ORF	Orinda Fire Station – 1973 - 2021
Saint Mary's	SMC	Saint Mary's College – 1972 - 2021
Los Medanos	MED	Les Medanos – 1974 - 2021
Brentwood	BCO	Brentwood Corp Yard – 1959 - 2021
WC	FCD	Flood Control Headquarters – 1959 - 2021
Martinez	ADH, CRK	Arroyo Del Hambre, Cummings Peak – 1959 - 2021

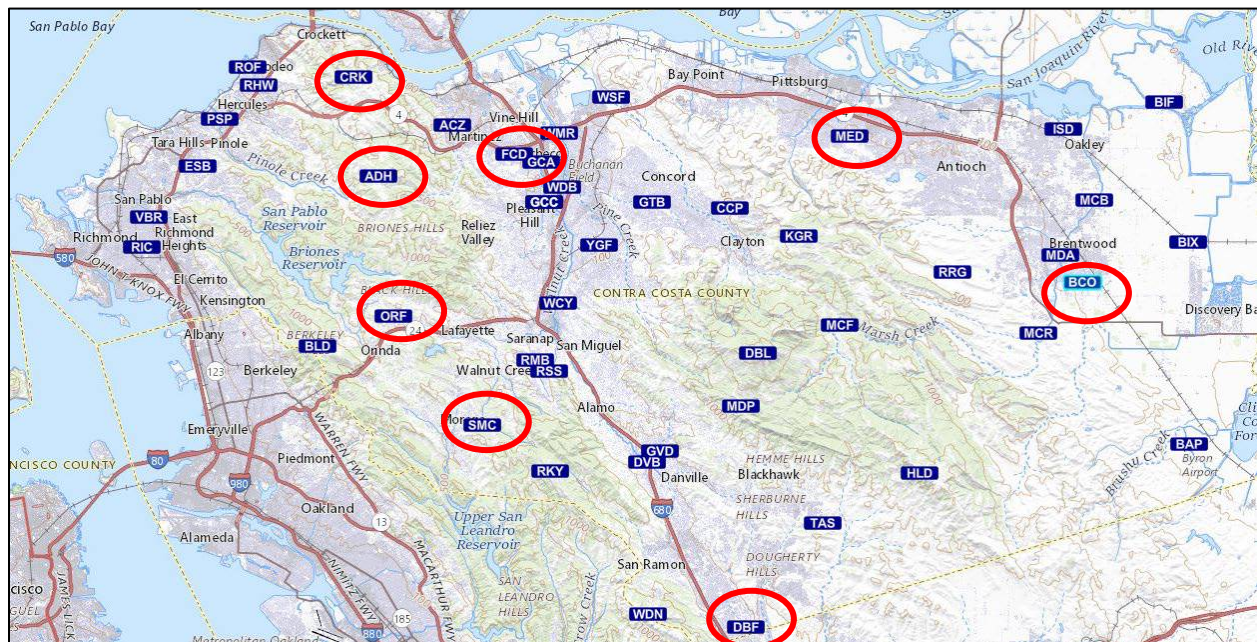


Figure 13 – Contra Costa Rainfall Gage Locations

A plot of the data for the Dublin Fire Gage is shown in Figure 14 below:

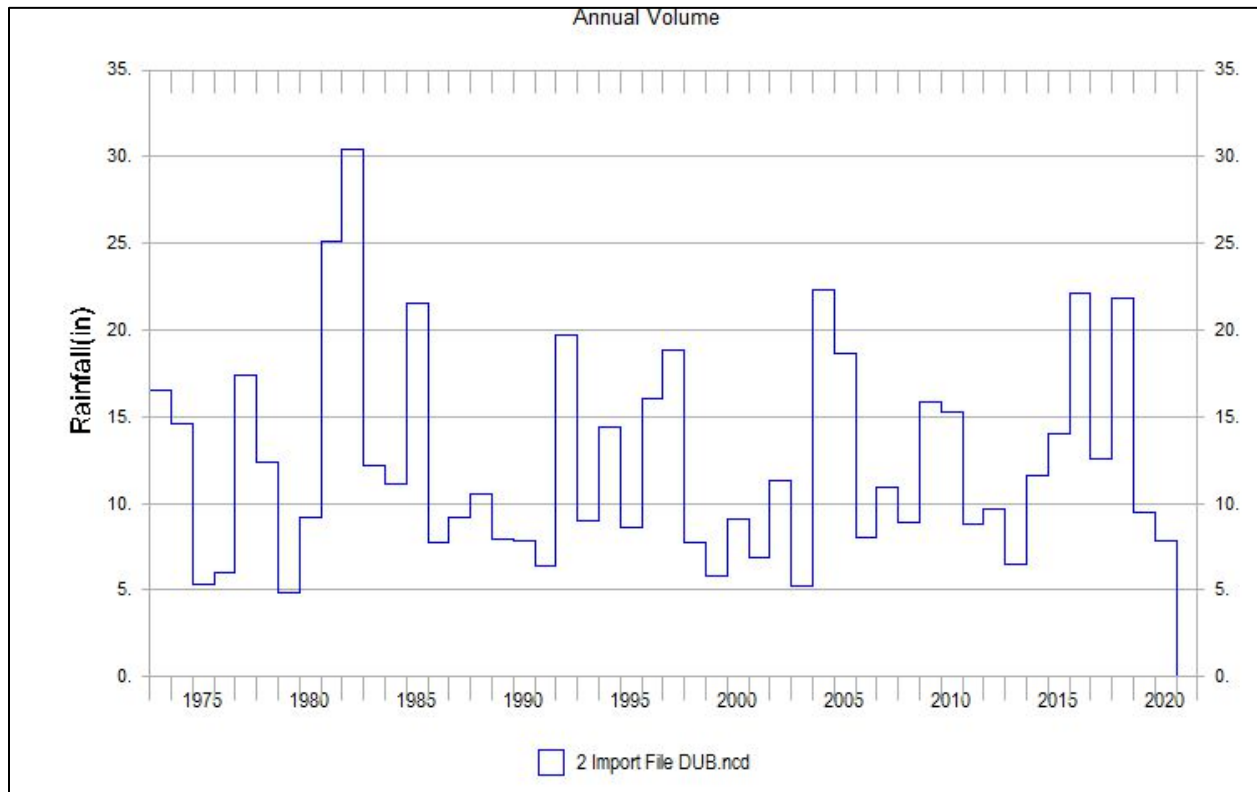


Figure 14 - Annual Rainfall Depth – Dublin Fire Gage.

A plot of the data for the Orinda Fire Gage is shown in Figure 15 below:

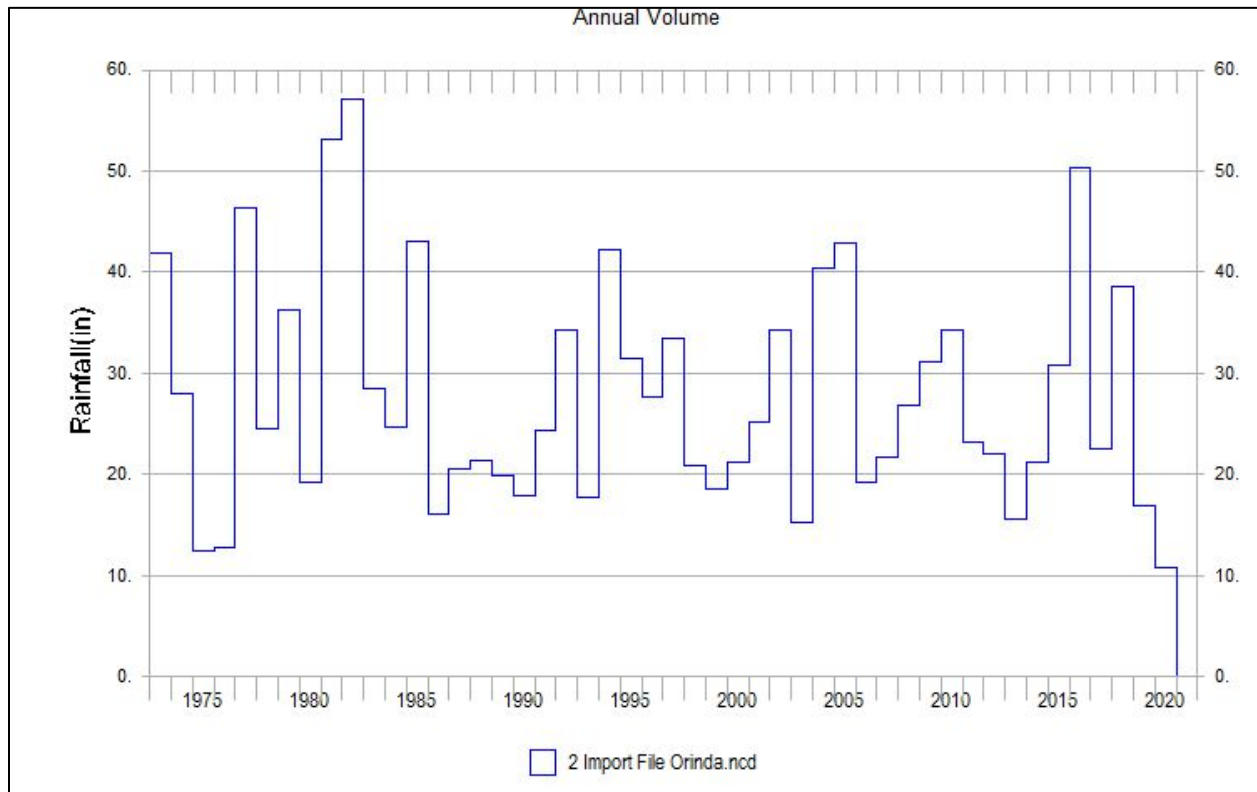


Figure 15 - Annual Rainfall Depth – Orinda Fire Gage.

A plot of the data for the St. Mary's Gage is shown in Figure 16 below:

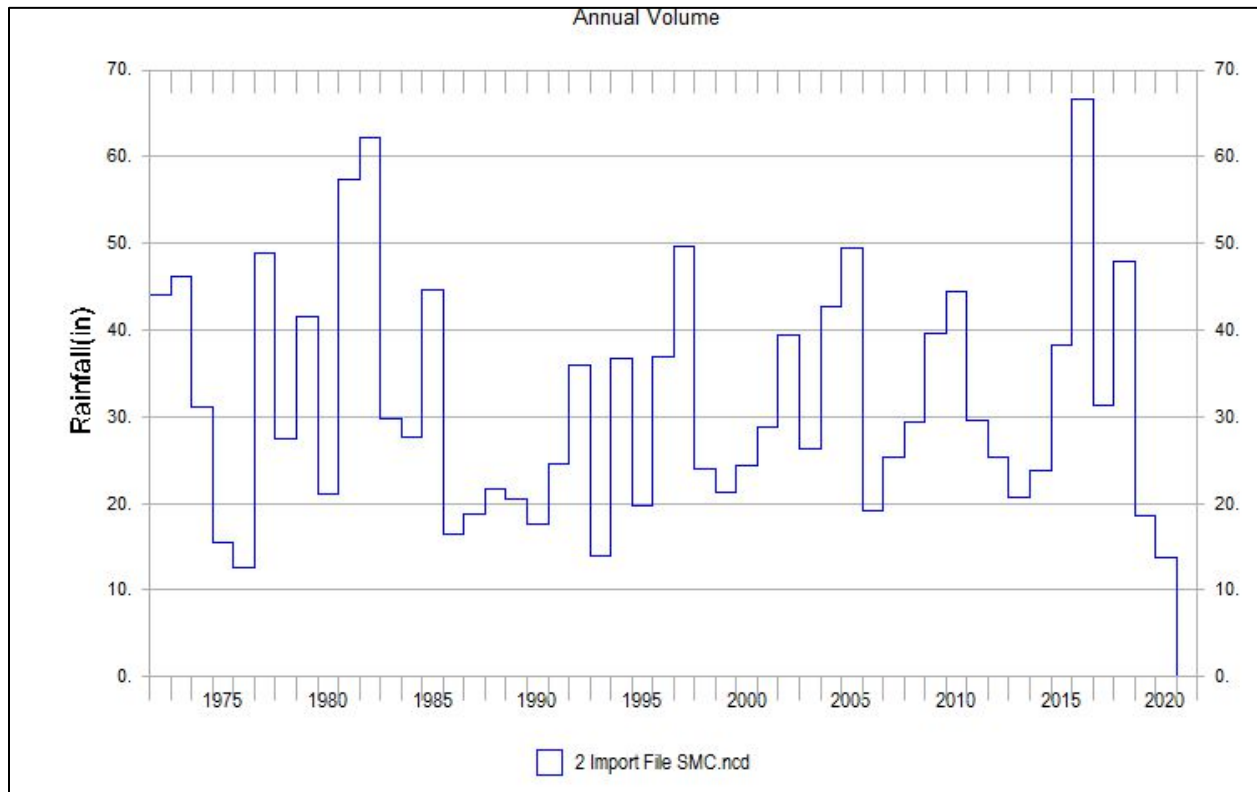


Figure 16 - Annual Rainfall Depth – St. Mary's Gage.

A plot of the data for the Los Medanos Gage is shown in Figure 17 below:

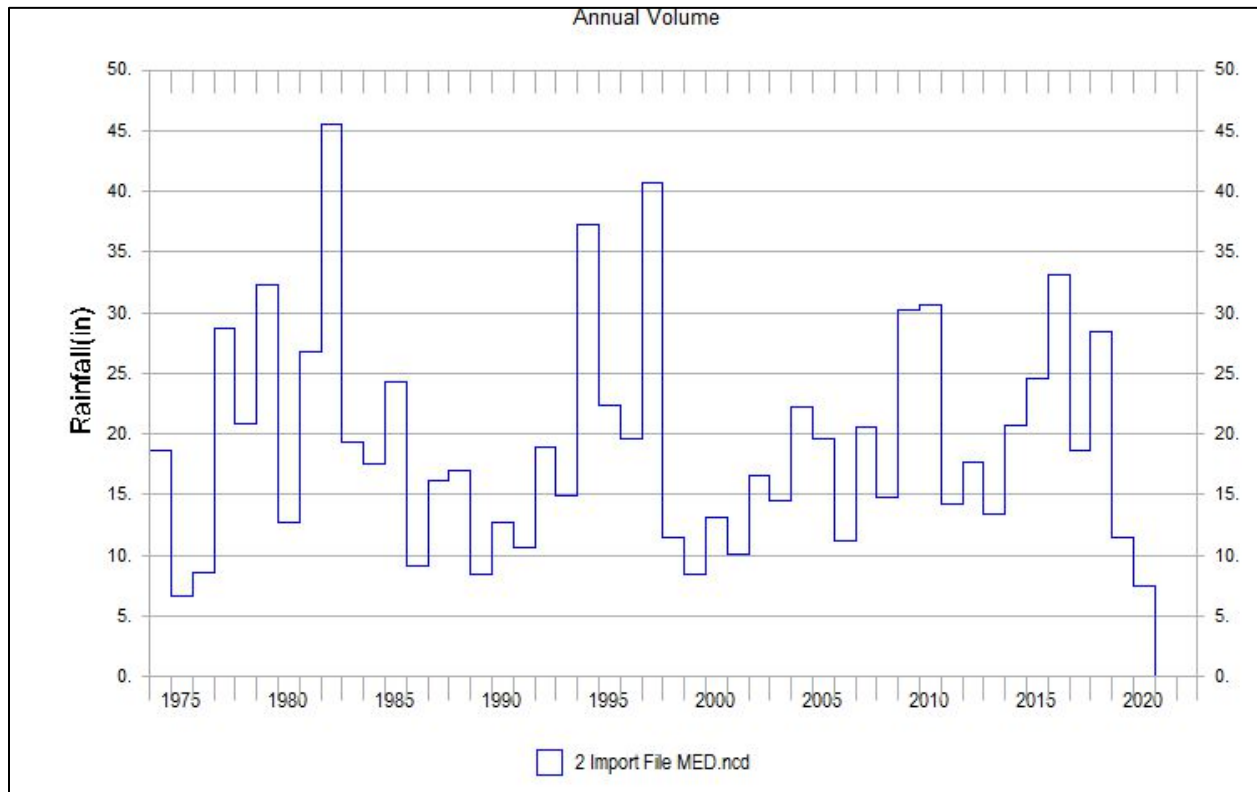


Figure 17 - Annual Rainfall Depth – Los Medanos Gage.

A plot of the data for the Brentwood Gage is shown in Figure 18 below:

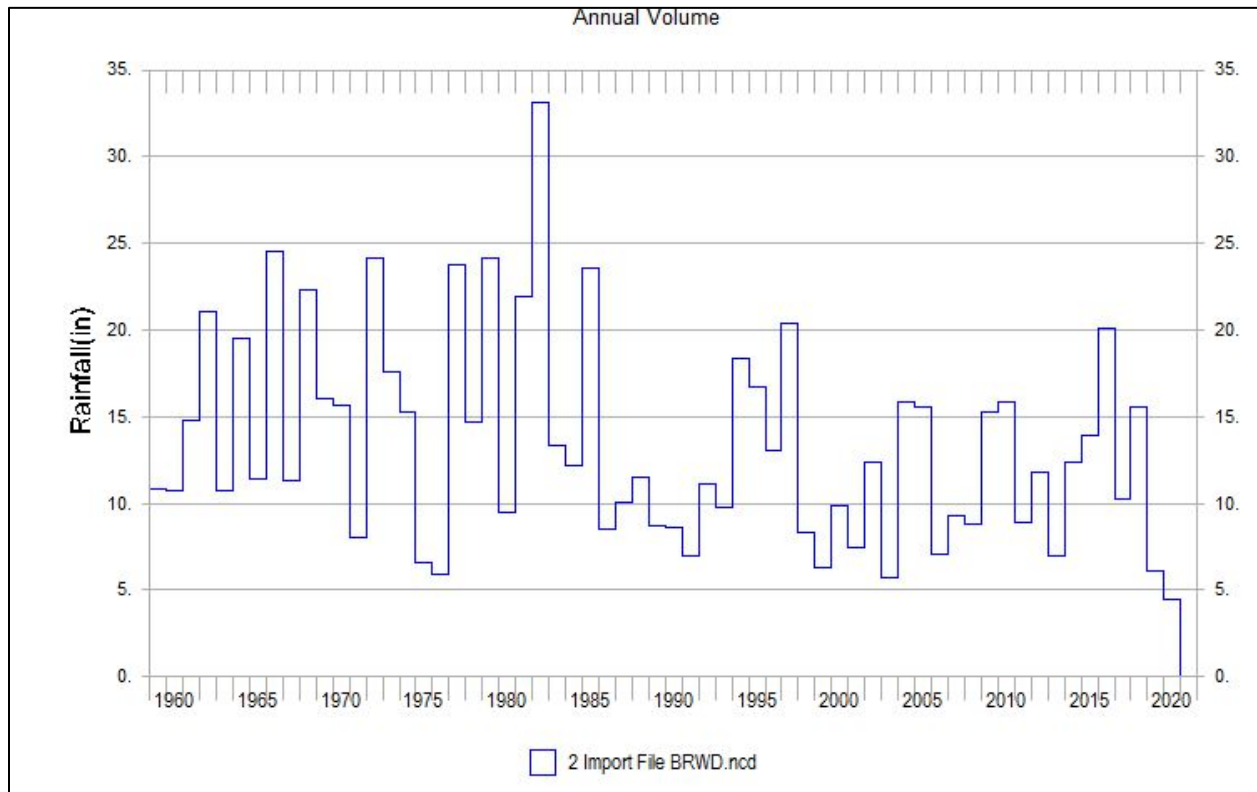


Figure 18 - Annual Rainfall Depth – Brentwood Gage.

A plot of the data for the Flood Control Headquarters Gage is shown in Figure 19 below:

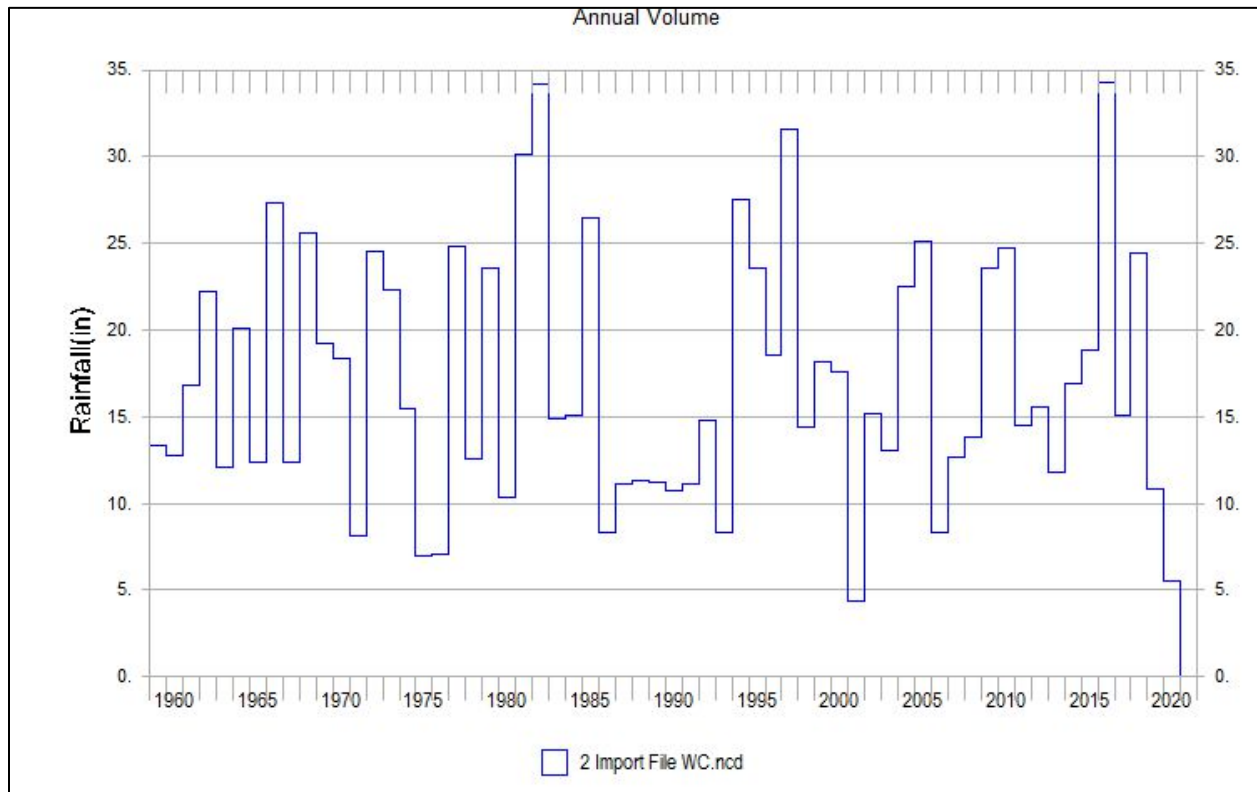


Figure 19 - Annual Rainfall Depth – Flood Control Headquarters Gage.

A plot of the data for the Martinez Gage is shown in Figure 20 below:

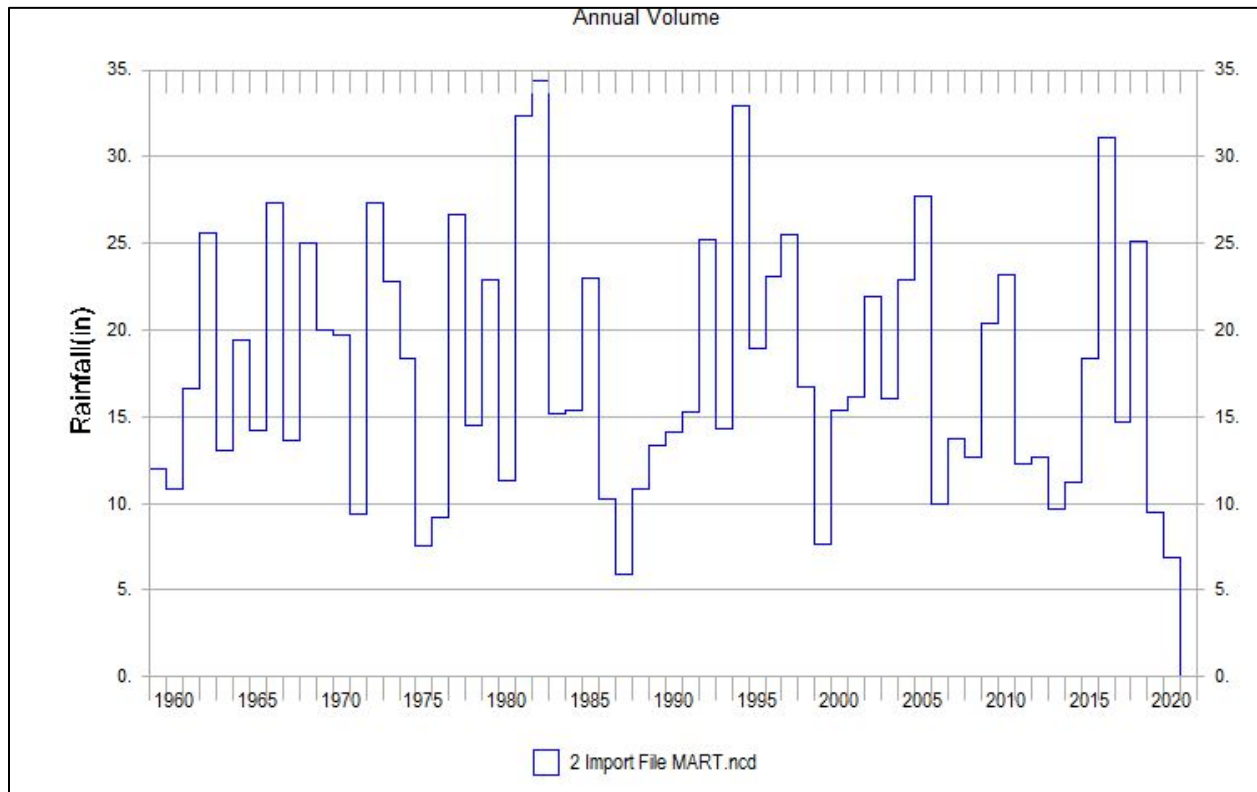


Figure 20 - Annual Rainfall Depth – Martinez Gage.

Summary

In total, 13 gages were updated and included in the BAHM2023 model.

1. Newark – 1948 - 2022
2. Berkeley – 1948 – 2022
3. Livermore – 1948 – 2022
4. San Jose – 1948 – 2022
5. Morgan Hill – 1948 - 2022
6. San Francisco – 1948 – 2022
7. Dublin Fire – 1973 – 2021
8. Orinda Fire – 1973 – 2021
9. Saint Mary's – 1972 – 2021
10. Los Medanos – 1974 – 2021
11. Brentwood – 1959 – 2021
12. WC, Flood Control District – 1959 – 2021
13. Martinez – 1959 – 2021

Annual Reporting for FY 2023-2024

**Regional Supplement for
New Development and Redevelopment**

**San Francisco Bay Area
Municipal Regional Stormwater Permit**

**Bay Area Municipal Stormwater
Collaborative**

September 2024

**MRP Regional Supplement for New Development and Redevelopment
Annual Reporting for FY 2023-2024**

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MRP Regional Supplement for New Development and Redevelopment Annual Reporting for FY 2023-2024

INTRODUCTION

This Regional Supplement has been prepared to report on regionally implemented activities complying with portions of the Municipal Regional Stormwater Permit (MRP) issued to 79 municipalities and special districts (Permittees) by the San Francisco Bay Regional Water Quality Control Board (Water Board). The Regional Supplement covers new development and redevelopment activities related to the following MRP 3.0 provision:

- C.3.j.iv Participate in Processes to Promote Green Infrastructure.

These regionally implemented activities were conducted under the auspices of the Bay Area Municipal Stormwater Collaborative (BAMSC), an informal coalition of the municipal stormwater programs in the San Francisco Bay Area¹. Most of the 2023-24 annual reporting requirements of Provision C.3.j.iv covered in this Supplement were completely met by BAMSC member activities, except where otherwise noted herein or by Permittees in their reports. Through their program representatives on the BAMSC Steering Committee and its Subcommittees, MRP Permittees collaboratively participated in these BAMSC informal regional activities.

GREEN INFRASTRUCTURE PLANNING AND IMPLEMENTATION

C.3.j.iv Participation in Processes to Promote Green Infrastructure

This provision requires:

(1) The Permittees shall, individually or collectively, track processes, assemble and submit information, and provide informational materials and presentations as needed to assist relevant regional, State, and federal agencies to plan, design, and fund incorporation of green infrastructure measures into local infrastructure projects, including transportation projects. Issues to be addressed include coordinating the timing of funding from different sources, changes to standard designs and design criteria, ranking and prioritizing projects for funding, and implementation of cooperative in-lieu programs.

This section describes activities and accomplishments during FY 2023-24 to promote green infrastructure (GI or GSI). The BAMSC activities described in this section provide compliance for MRP Permittees with this provision.

¹ In late FY 2020-21, the predecessor to BAMSC, the Bay Area Stormwater Management Agencies Association (BASMAA), dissolved as a formal non-profit organization and its members continued to meet as an informal organization under the name Bay Area Municipal Stormwater Coalition (BAMSC). BAMSC members jointly prepared this Regional Supplement for FY 2023-24.

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Activities and Accomplishments during FY 2023-24

MRP 3.0 C.3/GI Work Groups

The Alternative Treatment Systems, Special Projects Category C/Affordable Housing, and Road Reconstruction in DACs Work Groups concluded their meetings in the Summer of 2023 in advance of the Water Board's public hearing to adopt the amended MRP (R2-2023-0019) on October 11, 2023.

During the adoption hearing for the amended MRP 3.0, members of the Alternative Treatment Systems Work Group and the Road Reconstruction in DACs Work Group expressed concerns about two items:

1. The proposed permit amendment language related to alternative treatment systems; and
2. The lack of language in the amendment providing flexibility for green infrastructure for road reconstruction and active transportation projects in disadvantaged communities.

After hearing the concerns, and as part of the adoption of the amended permit, the Water Board members decided to set up an informal subcommittee of the Board, including Vice Chair Hacker (now Chair) and Board Member Kissinger, to further discuss C.3 issues related to the adopted permit and report back to the full Board in July of 2024.

The following development-related BAMSC regional work groups began to meet or continued to meet in FY 2023-24: the Asset Management Work Group, the Bay Area Hydrology Model (BAHM) Update Work Group, and the Trees and Stormwater Work Group.

BAMSC Trees and Stormwater Work Group

The Trees and Stormwater Work Group met twice in FY 2023-24. Attendees included staff from several municipalities, Regional Water Board, UC Extension, Davey Resource Group, and NGOs. The kickoff meeting on November 13, 2023, included a discussion of terms and definitions and goals for the Work Group. At the second meeting on February 12, 2024, the work group received a presentation from Peter Schultze-Allen (SCVURPPP) on work done by the City and County of Denver related to the benefits of trees and stormwater in the streetscape and its potential application in the Bay Area. Aspects of this Work Group that evaluate the stormwater quality benefit of trees have now been combined with the Long Term GSI Technical Working Group. However, in FY 2024-25, the Tree-BSM-Design Work Group of the Development Subcommittee will continue to meet and focus on design and construction challenges with integrating trees into bioretention systems.

BAMSC Asset Management Work Group

The purpose of the Work Group is to provide a forum to discuss and get regional agreement on approaches to condition assessment and O&M needs of stormwater quality assets. In FY 2023-24, two Work Group meetings were held, both focused on

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condition assessment of LID/GSI assets. At the January 29, 2024, meeting, the Work Group received presentations from Mike Adamow (Lotus Water, formerly SFPUC) and Cesar Arellano (City of San Jose) on SFPUC's and San Jose's Maintenance Field Guides and assessment criteria. At the March 25, 2024 meeting, the Work Group discussed draft criteria to evaluate the condition of LID/GSI assets and proposed definitions of asset management terms. The next meeting will be held on July 23, 2024, and will begin the discussion of assessing condition of trash control assets.

BAMSC Bay Area Hydrology Model Update Work Group

The Bay Area Hydrology Model (BAHM) is the primary tool for sizing hydromodification management facilities and demonstrating compliance with the hydromodification management requirements in Provision C.3.g of the MRP. The Work Group's goals were to update the BAHM software and User Manual to include recent rainfall data, enhanced features, and the ability to model areas in Contra Costa County, which is now using BAHM for hydromodification management compliance demonstration. A report on the BAHM updates was provided in the countywide program FY 2022-23 Annual Reports. During October 2023, virtual trainings on the updated BAHM2023 model were conducted for beginning and advanced users as well as municipal reviewers. Additional adjustments were made to the beta version of the BAHM2023 software during FY 2023-24, including correcting some rain gage data to better represent the extended periods of record for discontinued gages. The BAHM2023 software and User Manual have been finalized and posted on the Clear Creek Solutions [website](#), along with the recordings of the trainings and a video library by topic. The work of this Work Group is now complete.

BAMSC Development Subcommittee

The BAMSC Development Subcommittee continued to meet approximately quarterly during FY 2023-24 and promoted the implementation of GSI by providing a forum to discuss the following topics:

- Workforce development and GSI maintenance, including a panel of non-profit and for-profit GSI maintenance-related organizations discussing short-term and long-term goals for the Bay Area and the National Green Infrastructure Certification Program.
- GSI challenges and opportunities in the Bay Area, including a panel with Pam Boyle Rodriguez (Palo Alto), Reid Bogert (C/CAG) and Shannan Young (Dublin) discussing issues such as sea level rise, rising groundwater levels, difficulties finding feasible locations, construction costs, utility conflicts, etc.
- Trees and stormwater issues and how to address the requirements in MRP 3.0.
- Regional and statewide progress towards integrating complete and green streets projects including:
 - The recently released complete streets guidance from Caltrans that includes green street design information.

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- Updates from Josh Bradt on action items and steps moving forward for the “Roadmap of Funding Solutions for Sustainable Streets” from 2018, lessons learned from the San Pablo Stormwater Spine project completed in 2021, and improvements in Bay Area and State transportation grant funding criteria related to green street element inclusion.
- Water Board staff updates on the MRP 3.0, Provision C.3 amendment adopted on October 11, 2023.
- Coordination with MTC on a workshop for their Active Transportation Working Group in October 2023 and a planned workshop in Santa Clara County in September 2024.
- Coordination with the statewide cycling organization, CalBike, on a panel discussion of [green and complete streets](#) at the CalBike Summit, the annual conference, in San Diego on Thursday, April 18, 2024.
- Sharing information on large green and complete street projects in the Bay Area such as the Rumrill project in the City of San Pablo and the 14th Street project in Oakland.

Other Participation and Comments

- The Contra Costa County Regional Alternative Compliance (RAC) System Operational Document was completed in FY 2023-24. The document details the roles and responsibilities of various participants, explains the processes for generating, certifying, and verifying compliance units and the financial transactions involved in purchasing these units, and describes the phases of RAC System implementation.
- Peter Schultze-Allen (EOA/SCVURPPP) worked with ReScape to train 40 landscape maintenance staff from a large landscape maintenance company, [BrightView](#), on the basics of GSI and the proper procedures for maintaining bioretention systems. The training included classroom and field training in Milpitas on March 16, 2023. (This training was inadvertently omitted from the FY 2022-23 report.)
- John Steere (Contra Costa County) was featured in the “Hidden Heroes of the Greenbelt” documentary series available on the Greenbelt Alliance's YouTube [channel](#) in August 2023. Steere's portion of the docu-series highlighted nature-based solutions and watershed resilience in North Richmond and throughout the Bay Area. This film was featured at the Resilient North Richmond FilmFest for Earth Day, April 20, 2024, and highlighted the importance of green infrastructure and urban greening in combating flooding, sequestering carbon, and supporting climate resilience.
- Reid Bogert (SMCWPPP) presented the following technical and panel presentations at the California Stormwater Quality Association 2023 Annual Conference in San Diego on September 12, 2023:

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- [“The Climate Resilience Resources Guide](#) (2023) - Tools for Planning and Implementing Climate-Resilient Green Stormwater Infrastructure” (technical presentation)
 - “Equity Approaches in Climate Resilience and Nature-Based Solutions Planning in the Bay Area (panel)
 - “Building Adaptation Capacity through Resilient Schoolyards in San Mateo County” (technical presentation)
- Amanda Booth (City of San Pablo), Pam Boyle Rodriguez (City of Palo Alto), Shannan Young (City of Dublin), and Reid Bogert (SMCWPPP) participated in the following panel presentation at the California Stormwater Quality Association 2023 Annual Conference in San Diego on September 12, 2023: “GSI Implementation in the San Francisco Bay Area – Challenges and Opportunities for a More Collaborative, Integrated, and Innovative Future”.
- Peter Schultze-Allen (EOA/SCVURPPP) worked with staff from [MTC](#), [BAAQMD](#), [Save the Bay](#) and the [Bay Area Regional Collaborative](#) on a complete and green streets presentation on November 16, 2023 at MTC’s Active Transportation Working Group, which includes staff from municipalities and advocacy organizations.
- Reid Bogert (SMCWPPP) met with Congressional leaders in Washington D.C. on March 12 through March 14, 2024 to advocate for federal funding for GSI projects in San Mateo County, focusing on a \$59 million grant application submitted by C/CAG under the NOAA Climate Resilience Regional Challenge Grant and submitting federal member directed spending requests through the Senator’s offices under the Fiscal Year 2024 Budget Appropriations Act for multi-benefit GSI planning and a pilot GSI maintenance workforce development program.
- Reid Bogert (SMCWPPP) presented with a panel focusing on green stormwater infrastructure and resilient schoolyards partnerships at the San Mateo County Office of Education’s Climate Ready Schools Symposium on April 30, 2024. The panel, titled “Student-Centered Systems Change” was addressed to school district leadership, school site staff, and the County Superintendent’s Office staff on effective ways to integrate GSI with schoolyard greening and climate resilience initiatives.
- Joseph Draper (CASQA) presented the CASQA’s report titled “[The Socioeconomic Value of Urban Stormwater Capture](#) (2024)” at the CASQA Quarterly Seminar Series on April 25, 2024, which included an evaluation of the socioeconomic value of GSI projects in San Mateo County, including early implementation of sustainable streets projects throughout the County and a regional-scale multi-benefit stormwater capture project at Orange Memorial Park in South San Francisco.

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- Reid Bogert (SMCWPPP) contributed GSI related content to the CASQA "Rain Ready California" website intended to raise awareness about the value of stormwater as a resource. The website, <https://www.rainreadyca.org/>, went live in June 2024.

Future Activities

During FY 2021-22, Countywide Program and Permittee staff worked with Water Board staff as part of a BAMSC C.3/GSI Work Group on requirements for long-term and short-term implementation of GSI. The Work Group proposed an approach for setting short-term requirements in the context of long-term GSI implementation goals that would be established via a Technical Working Group (TWG), including Water Board staff and possibly outside science experts from EPA, SFEP, SFEI, and other organizations. As a result of these discussions, Provision C.3.j.ii.(4) of MRP 3.0 contains a provision for discussion of long-term GSI goals via the TWG. (Short-term GSI numeric targets for this permit term are described in Provision C.3.j.ii.(2) and Attachment H.) The TWG will begin meeting in FY 24-25 to discuss long-term goals for GI and reductions in impervious surfaces at individual, countywide and regional scales. A report summarizing the TWG's efforts and recommendations will be submitted with the FY 2024-25 Annual Report.

BAMSC representatives will also continue to engage in various coordination efforts related to funding and implementation support for GSI. For example, the BAMSC Steering Committee recently appointed a primary and two alternate representatives to attend future San Francisco Estuary Partnership meetings to continue advocating for appropriate funding and policy support for multi-benefit GSI projects. Additionally, BAMSC representatives will continue efforts to promote green and complete streets with MTC, BAAQMD, Save the Bay, CalBike, Caltrans, BARC and other Bay Area and California organizations.

Appendix C

Industrial and Commercial Site Controls

Tips for Mobile Fueling

Tips for Mobile Fleet Services

*Tips for Construction Contractors – Spanish and Chinese
Translations*

*Workshop Report: Hybrid Business and Illicit Discharge Stormwater
Inspector Training Workshop*

RESPONSIBILITIES FOR STORMWATER

Tips for Mobile Fueling Businesses

Mobile fueling businesses are responsible for any mobile fueling activities that lead to non-stormwater discharges to the street, gutter, or storm drain. The Clean Water Program's friendly and knowledgeable staff support businesses like yours in preventing water pollution and complying with stormwater regulations. The fact that you are reading this factsheet means you have already decided to take steps to do the right thing when you are conducting mobile fueling. Thank you for keeping our water safe and healthy.

Some jurisdictions in Alameda County do not allow mobile fueling, so please check local regulations.

Prepare

- Develop and follow a mobile fueling plan that includes operational best management practices (BMPs), spill response procedures, and emergency procedures.
- Keep absorbent spill clean-up materials, spill kits, and emergency supplies including fire extinguishers on hand when fueling.
- Check local regulations for additional requirements for mobile fueling, such as obtaining a business license, an operational permit, fire department approval, and/or complying with California Fire Code requirements.

Spill Prevention

- Centralize fueling activities in one location, where traffic will not drive over the fueling hose and as far from storm drains as possible.
- Put spill protection and containment features in place.
- Temporarily cover/block any nearby storm drains while fueling to prevent spills entering the storm drain system. Do not transfer fuel on top of storm drain inlets.
- Place drip pans or absorbent pads under the fueling connections during operations.
- Ensure an operator is present, observing, and in control of all active fuel transfer operations.
- Do not lock automatic shutoff fueling nozzles in the open position.
- Do not 'top off' fuel or fill the tank when the automatic shut off valve engages.



Keep fuel and oil OUT of the storm drains.



Spills and leaks from mobile fueling activities can result in the transport of pollutants into the street or storm drains and can damage sensitive habitats and kill wildlife. Water flowing into storm drains travels directly to local creeks and then to San Francisco Bay. It does not go to a wastewater treatment plant.

Learn more at
www.cleanwaterprogram.org



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Creeks, Wetlands & the Bay
cleanwaterprogram.org

Spill Response & Cleanup

- Immediately activate any fuel shut-off switch or valve and implement spill response procedures.
- Do not use water and soap to clean up spills or sheens. Clean up spills with absorbent materials only. Do NOT hose down spills.
- Spread absorbent material to absorb the spilled fuel, sweep up the absorbent with a broom, and dispose of it as hazardous waste.
- Use sealable containers or disposable bags to collect and dispose of hazardous materials.

Immediately notify the fire department (911) and your local stormwater agency in the event of a fuel spill entering storm drains or surface waters. You may be responsible for notifying other agencies, including California Office of Emergency Services (800-852-7550).

General Best Management Practices

- Schedule mobile fueling activities during dry weather and daytime.
- Train drivers/operators on proper fueling procedures, spill prevention, cleanup measures, and emergency procedures.
- Regularly maintain all fueling equipment. Check secondary containment structures for leaks or degraded components, repairing and replacing as necessary.
- Keep records/logs of maintenance, spill events, and trainings.
- Periodically inspect the spill kit to ensure contents are replenished.
- Dispose of absorbent and waste from fuel clean-up as HAZARDOUS WASTE. Do not dispose to the storm drain, sewer system, or in the trash. Learn more about disposing hazardous waste by contacting [Alameda County Small Business Hazardous Waste](#).

The **Storm Drain System** was built to collect and transport rain to prevent flooding in urban areas. Anything that flows or is discharged into the storm drain system goes directly into local creeks or San Francisco Bay without any treatment.

Local Stormwater Agencies

For advice on avoiding disposal to the storm drain system, contact:

Alameda.....	(510) 747-7930
Albany	(510) 528-5770
Berkeley.....	(510) 981-6400
Dublin	(925) 833-6630
Emeryville	(510) 596-3728
Fremont.....	(510) 494-4570
Hayward	(510) 881-7900
Livermore	(925) 960-8100
Newark	(510) 578-4286
Oakland	(510) 238-6600
Piedmont.....	(510) 420-3050
Pleasanton	(925) 931-5500
San Leandro	(510) 577-3401
Unincorp. Alameda County ...	(510) 670-5868
Union City.....	(510) 675-5308

For More Help

For advice and approval on wastewater disposal to the sanitary sewer system, contact:

Cities of Alameda, Albany, Berkeley, Emeryville, Oakland or Piedmont

East Bay Municipal
Utility District (EBMUD)..... (510) 287-1651

Castro Valley

Castro Valley Sanitary District..(510) 537-0757

City of Dublin

Dublin-San Ramon
Services District..... (925) 828-0515

Cities of Fremont, Newark or Union City

Union Sanitary District (510) 477-7500

City of Hayward

City of Hayward (510) 881-7900

City of Livermore

City of Livermore (925) 960-8100

City of Pleasanton

City of Pleasanton (925) 931-5500

Cities of San Lorenzo, unincorporated portions of San Leandro and Hayward

Oro Loma Sanitary District (510) 481-6971

City of San Leandro

City of San Leandro..... (510) 577-3401



CLEAN WATER PROGRAM

Simple changes to your operations and maintenance can help you comply with local regulations. The Clean Water Program makes it easy.

cleanwaterprogram.org

RESPONSIBILITIES FOR STORMWATER

Tips for Mobile Fleet Services Providers

Mobile fleet services providers are responsible for any activities that lead to non-stormwater discharges to the street, gutter or storm drain. The Clean Water Program's friendly and knowledgeable staff support business owners and managers like you in preventing water pollution and complying with stormwater regulations. The fact that you're reading this fact sheet means you have already decided to take steps to do the right thing. Thank you for keeping our water safe and healthy.

General Best Management Practices

- Know possible pollution sources from your operations, such as:
 - ✓ Leaking oil from vehicles.
 - ✓ Fuel, soaps, and other liquids.
 - ✓ Hose water.
 - ✓ Trash and litter.
- Inspect vehicles regularly to make sure there are no leaks, spills, or other source of stormwater pollution outdoors.
- Never allow hose water, wastewater, or other wastes to enter streets or storm drains.
- Have a spill prevention and management plan so that nothing enters storm drains and pollutes our local waterways.

Spill Prevention and Management

- Train all staff on Best Management Practices to prevent spills, leaks and discharges into streets and sidewalks.
- Make sure all activities are contained. Anything that is hosed off into streets or storm drains, or that could be carried to streets or storm drains by rainwater, is an illegal discharge.
- Have a spill plan. **Keep a clearly labelled spill kit on hand with instructions and materials for cleaning spills with dry methods: absorbents, towels/rags, brooms, shop vacuum.**
- Spills must be cleaned with absorbent and never hosed down.

Bathroom Waste

- All buses must have direct connections to the waste line to evacuate the bathroom wastewater. Dumping bathroom waste into catch pans is not allowed.
- All buses must have a vacuum hose connected directly to the outlet pipe from the on-board waste holding tank on the bus.
- All vacuumed bathroom wastewater must be hauled off site.



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cleanwaterprogram.org



Keep wash waters, wastewater, trash, and debris OUT of the storm drains. Keep oils, grease, and hazardous chemicals OUT of storm drains and sanitary sewers.



Draining wash water from cleaning activities into the street or storm drains damages sensitive habitats and can kill wildlife. Water flowing into storm drains travels directly to local creeks and then to **San Francisco Bay**. It does not go to a wastewater treatment plant.

Learn more about preventing water pollution and the Clean Water Program at www.cleanwaterprogram.org.



Mobile Fueling

Mobile fueling might not be an approved business activity in all cities/towns. You must obtain approval from each municipality you plan to operate in before providing any services. You must obtain any required licenses and/or permits from the appropriate departments (e.g., Fire, Business Licensing, Planning, CUPA).

Follow the requirements of your mobile fueling approval agency, including the following BMPs:

- On-site vehicle fueling must only be practiced where it is impractical to send vehicles off site for fueling.
- Avoid operations within 15 feet of a storm drain inlet or use a storm drain cover or equivalent method to prevent fuel from reaching the storm drain.
- Drip pans or absorbent pads must be used during fueling.
- Spill kits must be in fueling areas and on fueling trucks.
- Spills must be cleaned with absorbent and never hosed down.
- Never top off fuel and Diesel Exhaust Fluids (DEF).
- Fueling operations must not be left unattended.

Mobile Washing

- Property owners must have a designated wash area. This area must be clearly defined with signs and directions for staff.
- The wash area must be at least 25 feet from any storm drain and be flat to prevent runoff and impacts to storm drains.
- You must use a wash mat to contain the wash area so that water does not drain down streets and gutters. It must be made of durable vinyl coated material (not woven) that is reinforced to withstand traffic and heavy equipment.
- Wash mat must have metal ramps for buses to enter and exit.
- All staff must be trained to prevent over-spray or drag-out.
- Use a wet-vacuum or pump and hose to properly dispose of collected wash water.

Be a BASMAA Recognized Mobile Cleaner

Take the online “mobile surface cleaning” training from BASMAA (Bay Area Stormwater Management Agencies Association). This program will train you on how to clean different surfaces in an environmentally acceptable way and publish your name as a trained cleaner. Visit www.basmaa.org

KEY DEFINITIONS

The **Storm Drain System** was built to collect and transport rain to prevent flooding in urban areas. Anything that flows or is discharged into the storm drain system goes directly into local creeks or San Francisco Bay without any treatment.

The **Sanitary Sewer System** collects and transports sanitary wastes from interior building plumbing systems to the wastewater treatment plant where the wastewater is treated.

Local Stormwater Agencies

For advice on avoiding disposal to the storm drain system, contact:

Alameda.....	(510) 747-7930
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Fremont.....	(510) 494-4570
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cleanwaterprogram.org

RESPONSABILIDADES EN MATERIA DE AGUAS PLUVIALES

Consejos para los contratistas de la construcción

Los contratistas de la construcción son responsables de cualquier actividad en las propiedades en construcción que dé lugar a descargas de aguas no pluviales en las calles, alcantarillas o drenajes pluviales. El personal amigable y experto del Programa de Agua Limpia ayuda a empresas como la suya a prevenir la contaminación del agua y a cumplir con las regulaciones sobre aguas pluviales. El hecho de que esté leyendo esta hoja informativa significa que ya decidió tomar medidas para hacer lo correcto al trabajar en su proyecto de reparación, remodelación o construcción contratado. Gracias por mantener nuestra agua segura y sana.

Prácticas generales

- Mantenga el lugar del proyecto ordenado y limpio.
- Mantenga todos los escombros, sedimentos y agua con sedimentos en el sitio de trabajo.
- Conozca las fuentes de contaminación del proyecto, como sedimentos, líquidos automotrices, pinturas, solventes, pesticidas, basura, cemento, lavado de concreto, así como los residuos del trabajo de paisajismo y manténgalos fuera del sistema de alcantarillas.
- Proteja las entradas de los drenajes pluviales de cualquier tipo de contaminación.
- Proteja los materiales de construcción de la lluvia y los escurrimientos de agua.
- Mantenga accesibles los materiales de limpieza de derrames.
- Barra las superficies pavimentadas y recoja la basura regularmente.
- Inspeccione con frecuencia los equipos y vehículos en busca de fugas. Utilice bandejas de goteo o cojinetes hasta que se puedan reparar las fugas.
- Utilice controles adecuados para la erosión y los sedimentos (www.cleanwaterprogram.org/businesses/construction).

Capacitación a empleados y subcontratistas

- Capacite a todos los trabajadores para que mantengan el lugar del proyecto ordenado y limpio.
- Solo agua de lluvia por el drenaje. Respete la ley y no vierta materiales líquidos o sólidos en las calles o drenajes pluviales o en lugares donde la lluvia pueda arrastrarlos a las calles o drenajes pluviales.
- Coloque señales o notifique a los trabajadores que mantengan cerradas todas las tapas de los contenedores de basura y residuos, las zonas exteriores limpias y que indiquen la ubicación de los materiales de limpieza de derrames.

Pintura

- Nunca limpie brochas ni enjuague los recipientes de pintura en una calle, las alcantarillas, los drenajes pluviales o los arroyos.
- Lave las brochas en la medida de lo posible para eliminar el exceso de pintura.
- En el caso de las pinturas a base de agua, enjuague en un drenaje que vaya al alcantarillado de aguas residuales.



Mantenga las aguas de lavado, aguas residuales, sedimentos, basura, pintura y escombros FUERA de los drenajes pluviales.



El agua pluvial contaminada de las actividades de construcción que fluye hacia las calles o los drenajes pluviales daña los hábitats sensibles y puede matar vida silvestre. El agua que fluye hacia los drenajes pluviales viaja directamente a los arroyos locales y posteriormente a la Bahía de San Francisco. No va a ninguna planta de tratamiento de aguas residuales.

Obtenga más información en www.cleanwaterprogram.org.



- En el caso de las pinturas a base de aceite, limpie con diluyentes o solventes y elimine el líquido sobrante como residuo peligroso en los puntos de recolección de Residuos Domésticos Peligrosos del condado de Alameda.
- Recicle la pintura no utilizada.

Trabajos con concreto o cortes con sierra

- Cubra completamente y proteja los drenajes pluviales del concreto o del lodo cortado con sierra.
- Recoja con pala, absorba o aspire el lodo cortado con sierra y recójalo inmediatamente después de terminar un trabajo o finalizar una jornada.
- Lave los equipos y camiones de concreto fuera del sitio de la obra o en zonas de lavado contenidas que no permitan la descarga del agua de lavado en el suelo o las área circundantes. Deje que el agua de lavado se evapore y luego deseche adecuadamente el material sólido.

Gestión de materiales

- Realice el trabajo en interiores o bajo techo siempre que sea posible, para evitar la exposición a la lluvia, los escurrimientos y el viento.
- Almacene todos los equipos, materiales y productos de desecho bajo techo.
- Contenga y aspire las partículas y el polvo.

Zonas de almacenamiento y desechos al aire libre

- Cubra y contenga los materiales y reservas al aire libre cuando no estén en uso.
- Utilice tarimas de contención para elevar los materiales.
- Las reservas colocadas en superficies pavimentadas deben tener revestimiento.
- Las reservas no deben colocarse en las alcantarillas.
- Disponga del tamaño, tipo y número adecuados de contenedores/basureros/botes de residuos para su trabajo. Coloque los contenedores cubiertos con tapas o lonas de plástico. Nunca lave un contenedor para limpiarlo.
- Utilice un contenedor secundario al almacenar fluidos en el exterior.
- Guarde todos los artículos y baños portátiles lejos de las entradas de los drenajes pluviales.
- Utilice bandejas para el goteo debajo de las zonas de trabajo y equipos al aire libre donde exista la posibilidad de que se produzcan derrames y fugas.

Limpieza y control de derrames de emergencia

- Limpie inmediatamente cualquier derrame utilizando métodos de limpieza en seco en la medida de lo posible.
- Para goteos o derrames, pueden utilizarse absorbentes, trapos o arena para gatos, que luego se barrerán y desecharán adecuadamente.
- Si se requieren métodos de limpieza en húmedo, bloquee los drenajes pluviales, utilice una cantidad mínima de agua y recoja el agua de lavado para desecharla adecuadamente.

DEFINICIONES CLAVE

El *Sistema de Alcantarillas* se construyó para recoger y transportar la lluvia a fin de evitar inundaciones en áreas urbanas. Todo lo que fluye o se descarga en el sistema de alcantarillas va directamente a los arroyos locales o la Bahía de San Francisco sin ningún tratamiento.

El *Sistema de Alcantarillado Sanitario* recoge y transporta los desechos sanitarios desde los sistemas de plomería del interior del edificio hasta la planta de tratamiento de aguas residuales donde son tratadas.

Agencias locales de agua pluvial

Para obtener asesoramiento sobre cómo evitar la eliminación de desechos en el sistema de alcantarillas, comuníquese con:

Alameda.....	(510) 747-7930
Albany	(510) 528-5770
Berkeley.....	(510) 981-6400
Dublin	(925) 833-6630
Emeryville	(510) 596-3728
Fremont.....	(510) 494-4570
Hayward	(510) 881-7900
Livermore	(925) 960-8100
Newark	(510) 578-4286
Oakland	(510) 238-6600
Piedmont.....	(510) 420-3050
Pleasanton	(925) 931-5500
San Leandro	(510) 577-3401
Unincorp. Alameda County ...	(510) 670-5868
Union City.....	(510) 675-5308

Agencias de aguas residuales y alcantarillado sanitario

Para obtener asesoramiento y aprobación sobre cómo evitar la eliminación de desechos en el sistema de alcantarillado sanitario, comuníquese con:

Cities of Alameda, Albany, Berkeley, Emeryville, Oakland or Piedmont

East Bay Municipal

Utility District (EBMUD)..... (510) 287-1651

Castro Valley

Castro Valley Sanitary District..(510) 537-0757

City of Dublin

Dublin-San Ramon

Services District..... (925) 828-0515

Cities of Fremont, Newark or Union City

Union Sanitary District (510) 477-7500

City of Hayward

City of Hayward (510) 881-7900

City of Livermore

City of Livermore (925) 960-8100

City of Pleasanton

City of Pleasanton (925) 931-5500

Cities of San Lorenzo, unincorporated portions of San Leandro and Hayward

Oro Loma Sanitary District (510) 481-6971

City of San Leandro

City of San Leandro..... (510) 577-3401



CLEAN WATER PROGRAM

Cambios sencillos en sus operaciones y mantenimiento pueden ayudarle a cumplir con las regulaciones locales. El Clean Water Program lo hace fácil.
cleanwaterprogram.org

暴雨水責任 給工程承包商的建議

若施工中物業的任何活動造成非暴雨水排入街道、排水溝或暴雨水下水道，工程承包商需負起責任。潔淨水專案 (Clean Water Program) 平易近人又見多識廣的工作人員樂於協助諸位商家防止水污染並遵守暴雨水法規。你願意閱覽本說明書，即表示你已決定要在進行承包修繕、重新裝修或施工工程時採取妥善措施。感謝你致力於保持我們的用水安全及健康。

般措施和做法

- 施工地點請保持整潔與乾淨。
- 將所有碎屑、沉積物和含沙量大的水流留在工地。
- 清楚施工案的污染源 (如沉積物、車用化學液、油漆、溶劑、殺蟲劑、垃圾、水泥、混凝土沖洗水和園藝廢水) 並防止它們流到暴雨排水系統中。
- 避免暴雨水排放口發生任何形式的污染。
- 避免建築材料受到雨水和徑流沖刷。
- 潑灑物清潔用品請放在觸手可及之處。
- 定期清掃鋪設好的路面並撿拾垃圾。
- 經常檢查設備和車輛是否漏油。使用接油盤或墊子接油，直到漏洞修好為止。
- 採用妥善的侵蝕物和沉積物管制措施

(www.cleanwaterprogram.org/businesses/construction)。

培訓員工和分包商

- 培訓所有工作人員，使其保持工地的整潔與乾淨。
- 只有雨水能排入下水道。請遵守法律，勿將任何液體或固體材料沖刷到街道上或暴雨水下水道內，或是雨水可能將其沖到街道上或暴雨水下水道內的任何位置。
- 張貼標誌和/或告知工作人員，請其將垃圾裝卸車和垃圾桶的蓋子蓋好、戶外區域勿堆放雜物，並且標示潑灑物清潔用品的放置位置。

油漆

- 切勿讓清洗油漆刷或油漆桶的水排放到街道上、排水溝、暴雨水下水道或溪流中。
- 盡可能將油漆刷上的油漆刷完，勿在刷子上殘留多餘的油漆。
- 水性漆可沖入流經排污下水道的排水管。
- 油性漆請用稀釋劑或溶劑清洗，殘餘液體需視為有害廢棄物，送至阿拉米達縣家庭有害廢棄物處理站棄置。
- 未用過的油漆請回收使用。



避免沖洗水、廢水、沈澱物、垃圾、油漆和碎屑流到暴雨水下水道。



因施工活動而受到污染的暴雨水若流入街道或暴雨水下水道，會破壞敏感棲息地，並可能會殺死野生動植物。流入暴雨水下水道的水皆直接排放到溪流，然後流入舊金山灣。不會經過廢水處理廠。

詳情請參閱 www.cleanwaterprogram.org。



Protecting Alameda County
Creeks, Wetlands & the Bay
cleanwaterprogram.org

泥作/木工

- 小心蓋好暴雨水下水道，避免混凝土或木屑與水混合而成的漿液流入暴雨水下水道。
- 在一個地點完工或每天收工時，使用鏟子將木屑集中到一處或用吸塵器集塵，然後撿拾乾淨。
- 請在不會將沖洗水排入土壤或周邊區域的其他地點或工地內專設的清洗區沖洗混凝土設備/卡車。讓沖洗水蒸發，然後妥善棄置其中的固體物。

材料管理

- 盡可能在室內或遮蓋物下方施工，避免雨水、徑流沖刷材料及受到風吹。
- 將所有設備、材料和廢棄物存放在室內。
- 將顆粒物和灰塵集中在一處，並用吸塵器集塵。

戶外儲藏室與廢棄物棄置區

- 戶外材料和儲備用品不使用時請集中在一處並蓋好。
- 使用安全棧板將材料墊高。
- 堆放在鋪設路面上的儲備用品必須使用保護墊。
- 儲備用品不可堆放在排水溝中。
- 施工地點需設置大小、種類和數量適中的垃圾桶/垃圾裝卸車/垃圾箱。容器需置於遮蓋物下方，用蓋子或防水布/塑膠布蓋好。請勿為了清空垃圾裝卸車而用水沖刷。
- 存放在戶外的液體請使用第二層防漏容器。
- 所有物品和流動廁所都必須遠離暴雨水排放口。
- 戶外施工和設備區域請使用接油盤，以防油體潑灑及滲漏。

清潔和緊急潑灑控制

- 盡可能使用乾洗方式，即刻清理任何潑灑出來的油體。
- 若油體滴出或潑灑，請使用吸收劑、抹布或貓砂吸乾，然後擦拭並妥善丟棄。
- 若需使用濕洗方式，請堵住暴雨水下水道，盡量用最少的水清洗並將沖洗過後的水集中，妥善棄置。

重要定義

暴雨排水系統 (Storm Drain System) 的功能是收集和輸送雨水，防止城市地區發生淹水。任何流入或排入暴雨排水系統的東西，都會直接進入本地溪流或舊金山灣，不會經過任何處理。

排污下水道系統 (Sanitary Sewer System) 的功能是收集室內建物管道系統排出的生活廢棄物，然後輸送到污水處理廠進行污水處理。

本地暴雨水主管機關

如果你需要尋求建議，以避免將污染物排入暴雨排水系統，請聯絡：

Alameda.....	(510) 747-7930
Albany	(510) 528-5770
Berkeley.....	(510) 981-6400
Dublin	(925) 833-6630
Emeryville	(510) 596-3728
Fremont.....	(510) 494-4570
Hayward	(510) 881-7900
Livermore	(925) 960-8100
Newark	(510) 578-4286
Oakland	(510) 238-6600
Piedmont.....	(510) 420-3050
Pleasanton	(925) 931-5500
San Leandro	(510) 577-3401
Unincorp. Alameda County ...	(510) 670-5868
Union City.....	(510) 675-5308

廢水與排污下水道機關

如果你需要尋求建議和批准，以便將污水排入排污下水道系統，請聯絡：

Cities of Alameda, Albany, Berkeley, Emeryville, Oakland or Piedmont

East Bay Municipal

Utility District (EBMUD)..... (510) 287-1651

Castro Valley

Castro Valley Sanitary District..(510) 537-0757

City of Dublin

Dublin-San Ramon

Services District..... (925) 828-0515

Cities of Fremont, Newark or Union City

Union Sanitary District

City of Hayward

City of Hayward

City of Livermore

City of Livermore

City of Pleasanton

City of Pleasanton

Cities of San Lorenzo, unincorporated portions of San Leandro and Hayward

Oro Loma Sanitary District

City of San Leandro

City of San Leandro.....



潔淨水專案

你只需在作業和維護方面做一些簡單改變，即可符合地方法規。潔淨水專案能助你輕鬆達成目標。

cleanwaterprogram.org

Post Workshop Report: Stormwater Business and Illicit Discharge Inspectors Workshop Training Fiscal Year 2023-2024

The Clean Water Program's Industrial and Illicit Discharge subcommittee (IIDC) sponsored a stormwater business inspectors and illicit discharge inspector training workshop on February 22, 2024 with a classroom and field session. The Workshop was held in person at the Alameda County Offices Planning Hearing Room, Hayward with an option to attend the classroom session only via the Zoom Webinar platform. The Training Workgroup members responsible for planning the workshop are identified below.

Sharon Gosselin	ACCWP
Aileen Mendoza	Alameda County
Michael Perlmutter	City of Oakland
Echo Lee	City of Alameda
Kristin Kerr	EOA, Inc.

The Agenda for the Workshop is attached. For people that attended in-person the same field session was held before and after the classroom session, which allowed for a smaller group in the field. Forty three (43) people attended the entire 2.5 hour workshop in person and 24 people attended the 1.5 hour classroom session only virtually. The attendance list for the Workshop, sorted by agency, is attached. The workshop classroom presentations are available in PDF files on the Clean Water Program's (CWP's) website IIDC members only webpage. The case studies and inspector resources presentations are available to the CWP's members as a recording on the Vimeo training website.

MRP (R2-2022-0018) provision C.4.e staff training requirements include 5 topics that must be provided in inspection training within the 5-year permit term. The table below will track the topics covered by the CWP trainings. Note that the CWP training coverage of Business Inspection Plans (BIP) and Enforcement Response Plans (ERP) will discuss what generally is included in these documents. Agencies should consider internal training activities that address their agency specific BIP and ERP.

MRP Training Topics (C.4.e.ii)

MRP Training Topics (C.4.e.ii)	Fiscal Year				
	FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
Urban Runoff P2	X ¹	X			
Inspection Procedures		X			
Business Inspection Plan	X ²				
Enforcement Response Plan	X ²				
Illicit Discharge Detection and Elimination	X	X			
Best Management Practices	X ¹	X			

Notes:

1. Provided inspector resources for identifying BMPs for business categories and illicit discharge sources.
2. Generally discussed required elements of BIPs and ERPs. Agencies should consider internal training activities that address their agency specific BIP and ERP.

Workshop Evaluation

Completed evaluations: 34

Percent of attendees completing evaluation: 51%

Evaluation Question	Response
The presentations were clear and easy to follow	3.74 average rating (out of 4) ¹
Overall, the presentations were informative and useful	3.70 average rating (out of 4) ¹
I will use the skills learned in the workshop today on the job	3.74 average rating (out of 4) ¹
The presenter(s) were knowledgeable in the subject matter	3.82 average rating (out of 4) ¹
Did this training meet your expectations?	Yes: 28 No: 2
Do you prefer in the in-person training in the future?	Yes: 29 No: 5

Note: ¹Strongly Disagree = 1, Strongly Agree = 4

What parts of the training were most useful to you?

- Pictures of incidents and examples (3)
- The presentations (3)
- Going over good & bad examples and which BMPs to apply/suggest/implement when (2)

- The resources, links and materials
- Learning about the online resources (6)
- Case studies (9)
- All (2)
- How to manage and identify hazardous materials/waste
- Hazardous materials and waste - it was good to know when to make a referral (2)
- Alameda County Environmental Health presentation was great
- Learning corrective action imposed by the respective agency and the resolution performed
- Powerpoints & hands on field training/outside session
- Q&A- discussion with other inspectors (2)

What would have made this training more useful?

- To learn what other agencies do, what level of enforcement is taken
- Speaker from the Water Board
- Nothing, it was good and easy to follow
- An example of a facility and BMPs
- Practical examples
- Enforcement examples
- Interactive questions
- More case studies
- Provide more examples of site violations and corrective actions with options to resolve the violation(s)
- More presentations on conducting an inspection, report writing
- More case studies of minor violations, Class II violations and Class I violations for comparison
- More specific examples. Also what specific jurisdictions expectations are in terms of BMPs and reporting
- The field presentation would benefit from more technical background of the products presented
- Workshop available to Clean Water inspections
- Comments specific to virtual attendees:
 - Better IT at the beginning
 - Fix the audio
 - We couldn't hear the in-person questions, recommend repeating them so online listeners can follow

What subjects would you like to see addressed in future workshops?

- More BASMAA related
- Homeless encampments control
- Illicit discharges
- What discharges can go to storm drain (exemptions) (e.g., NPDES covered discharges, condensate, etc.)
- Surface cleaning/power washing and coordinating permitted discharges with sanitary sewer programs like EBMUD.
- Mobile businesses
- Focus on enforcement and enforcement mechanisms. If you're using local ordinance how does your jurisdiction enforce it?
- CWP practices and methods

- Mobile businesses, what is allowed
- What to look for in Clean Water inspection
- SWPPP, enforcement mechanisms/tools
- Animal waste, horse barns
- Inspections and report writing
- Potential fines/consequences if don't comply
- Some material is critical information
- Procedure for businesses that will not correct ongoing corrective actions
- More BMPs, different industries discussed and more case studies
- Role playing presentation to show an example of an inspection for different business types and enforcement examples
- Anything relating to stormwater problems
- Abatement of illicit discharges when you cannot contact a responsible party
- Stormwater violations, BMP deficiencies and implementation, and corrective actions

General Comments?

- Add introductions/raise your hand if you are a/b/c, will help with networking
- Thank you for organizing this training
- Good presentations
- Nice venue, well-organized, good pace and amount of information
- Thank you
- Facility was difficult to navigate
- Very informative & well organized
- Please scheduled training with more than one month notice, had to scramble to attend
- Keep organizing such trainings in the future
- If in person maybe there can be a location with easier parking
- I liked the snacks, thanks
- Presenters could have a microphone on their shirts and laser pointer would be helpful
- Being a stormwater inspector varies from agency to agency. There should be a way to standardize what we do.
- Would preferred a more interactive learning environment
- Overall this was excellent, especially the coffee and treats really helped
- The training was useful
- Respected agency and Subcommittee to provide more in-person training and certifications to ensure standards procedures are met by providing inspection training and SOP materials

Attendees

Inspector - 26

Supervisor - 2

Stormwater Program Staff/Manager - 4

Other - 2



Stormwater Business and Illicit Discharge Inspectors Workshop: Together Again

Thursday, February 22, 2024

9:00 am to 11:30 am (Registration Begins at 8:45am)

Or

10:00 am to 12:30 pm (Registration Begins at 9:45am)

**Alameda County Offices – Planning Hearing Room
224 W Winton Ave, Hayward, CA 94544**

	Topic	Speaker	Time
	Registration – Field Session #1		8:45 am
	Field Session #1: Illicit Discharge Containment and Clean Up BMPs	Myles VanBrocklin, New Pig	9:00 am
	Registration – Classroom Session		9:45 am
	Classroom Session Welcome	Aileen Mendoza, Alameda County Environmental Health IIDC Chair	10:00 am
1.	What Should Stormwater Inspectors Know About Hazardous Materials/Wastes?	Luke Voropaeff, Senior Hazardous Materials Specialist, Alameda County Department of Environmental Health	10:10 am
2.	Business Inspection Case Studies: Restaurant and Industrial Facility	Michael Perlmutter, Watershed Program Specialist, City of Oakland	10:40 am
3.	Inspector Resources	Kristin Kerr, EOA, Inc.	11:10 am
	Adjourn Classroom		11:30 am
	Field Session #2: Illicit Discharge Containment and Clean Up BMPs (Same as Field Session #1)	Myles VanBrocklin, New Pig	11:50 am
	Adjourn Field Session #2		12:30 pm

ACCWP Business and Illicit Discharge Stormwater Inspector Workshop
February 22, 2024

Attendance List (In-Person Workshop)

	First Name	Last Name	Agency
1	Devin	Gomez	Alameda County DEH
2	Stephanie	Hessler	Alameda County DEH
3	Timothy	Hildreth	Alameda County DEH
4	My Le	Huynh	Alameda County DEH
5	Aileen	Mendoza	Alameda County DEH
6	Nicholas	Nobrega	Alameda County DEH
7	Marisol	Novak	Alameda County DEH
8	Erdmann	Rogge	Alameda County DEH
9	Antoinette	Stetzenmeyer	Alameda County DEH
10	Fatinah	Zareef	Alameda County DEH
11	Matthew	Soby	Alameda County DEH CUPA
12	Teena	Whitmer	Alameda County DEH CUPA
13	Sharon	Gosselin	Alameda County Public Works Agency
14	Echo	Lee	City of Alameda
15	Jim	Barse	City of Alameda Public Works Department
16	Lam	Inthavong	City of Berkeley
17	Nicole	Kim	City of Berkeley
18	Jamie	Cooney	City of Berkeley CUPA
19	Karl	Etulle	City of Berkeley/Toxics Management Division
20	Meridith	Lear	City of Berkeley/Toxics Management Division
21	Melissa	Fajardo	City of Hayward
22	Bashir	Sarwary	City of Hayward
23	Ernest	Garcia	City of Livermore
24	Monica	Navarro	City of Livermore
25	Mike	Perlmutter	City of Oakland
26	Jen	Stern	City of Oakland
27	Michael	Warning	City of Pleasanton
28	Khalil	Al-Khalidi	City of Pleasanton
29	Leff	Lefferts III	EOA, Inc.
30	Zach	Leherr	EOA, Inc.
31	Ahmad	Ahmadzai	SSA / DEH
32	Shane	Cruzen	Surf To Snow Environmental Resource Management, Inc.
33	Luke	Swanson	Surf To Snow Environmental Resource Management, Inc.
34	Mike	Taylor	Surf To Snow Environmental Resource Management, Inc.
35	Sabrina	Tereo	Surf To Snow Environmental Resource Management, Inc.
36	Alicia	Dutrow	Union Sanitary District
37	Marian	Gonzalez	Union Sanitary District
38	Michael	Lothian	Union Sanitary District
39	Edda	Marasigan	Union Sanitary District

ACCWP Business and Illicit Discharge Stormwater Inspector Workshop

February 22, 2024

Attendance List (In-Person Workshop)

	First Name	Last Name	Agency
40	Joseph	Mendoza	Union Sanitary District
41	Alex	Paredes	Union Sanitary District
42	Aaron	Robles	Union Sanitary District
43	Joseph	Soto	Union Sanitary District

ACCWP Business and Illicit Discharge Stormwater Inspector Workshop

February 22, 2024

Attendance List (Virtual Classroom Only)

	First Name	Last Name	Agency/Organization
1	Zaida Aurora	Cholico Santoyo	ACCWP/LWA
2	Robert	Tolentino	Alameda County
3	David	Craighead	City of Albany
4	Jose	Alonso	City of Berkeley
5	Diego	Figueroa	City of Berkeley
6	Michelle	Sung	City of Dublin
7	Elliot	Wier	City of Fremont
8	William	Freeman	City of Hayward
9	jaime	rosenberg	City of Hayward
10	Ben	Livsey	City of Oakland
11	Rita	Di Candia	City of Pleasanton
12	Miguel	Salcido	City of Pleasanton
13	Lisa	Maffei	City of San Leandro
14	Tiffany	Treece	City of San Leandro
15	Matthew	Oh	City of San Leandro CUPA
16	Willard	Balisi	City of Union City
17	Eddie	Yu	City of Union City
18	Malia	Forbert	Surf To Snow Environmental Resource Management, Inc.
19	Kelsey	Laux	Surf To Snow Environmental Resource Management, Inc.
20	Eugenio	Briones	Zone 7 Water Agency
21	Elliott	Levitsky	Zone 7 Water Agency
22	Junming	Li	Zone 7 Water Agency
23	Athena	Watson	Zone 7 Water Agency
24	Mariza	Sibal	Zone 7 Water Agency

Appendix D

Construction Site Control

Workshop Report: Construction Stormwater Inspector Workshop

Construction Stormwater Inspector Workshop

Fiscal Year 2023-24 - DRAFT

The Clean Water Program’s New Development Subcommittee (NDS) sponsored a MRP Provision C.6 training workshop on April 30, 2024. The virtual workshop was held on the *GoTo Training* platform. The workshop was attended by 75 agency staff and consultants that support Clean Water Program member agencies. The workgroup members responsible for planning the workshop were:

Daniel Matlock	City of Fremont
Ken Shih	City of Fremont
Cristela Soto	City of Alameda
Mike Perlmutter	City of Oakland
Dennis Larks	City of Oakland
Sandy Mathews	Larry Walker Associates
Sophie McFadin	Larry Walker Associates

The workshop focused on the MRP C.6 requirements relevant to construction stormwater inspectors. The presentations included:

- *C.6 Requirements and BMPs* presented by Mike Perlmutter, City of Oakland
- *Documenting Inspections* presented by Daniel Matlock, City of Fremont
- *Inspection Group Exercise* facilitated by Sophie McFadin, Larry Walker Associates
- *Demolition Project BMP Case Study* presented by Mary Skramstad, City of Berkeley
- *Creekside BMP Case Study*, presented by Jen Stern, City of Oakland
- *Regional Water Board Perspective* presented by Joseph Monical, San Francisco Bay Regional Water Board

The virtual training session was recorded and will remain available on the Clean Water Program’s video hosting platform, available to the Clean Water Program members.

Effectiveness Assessment

Pre- and post-workshop surveys provided insights into the knowledge of the participants before and after the workshop. Fifty attendees (67%) completed the pre-workshop survey, and 56 attendees (74%) completed the post-workshop survey. Those that responded showed significant improvements of the key concepts on the new MRP 3.0 requirements following the workshop. The pre-workshop survey had an average correct response rating of 66% compared to 84% in the post-workshop survey. Approximately ¼ of the attendees reported this was their first C.6 workshop.

Workshop Evaluation

Sixty-two of the 75 attendees (83%) completed evaluations. The overall average rating of the workshop was approximately 4.7, out of a maximum of 5.0 (**Table 1**). Attendees generally valued the information presented in the training and several specifically identified the inspection exercise and the perspective from the Regional Water Board.

Future training needs identified by attendees included: more detailed training on BMP installation, information on stormwater sampling, examples of sites with good BMPs, more information on enforcement and enforcement response plans, and more case studies.

Table 1. Workshop Evaluation Summary

Evaluation Item	Average Rating (out of 5)¹
The training was useful and informative.	4.72
I will use the skills learned in the workshop today on the job.	4.68
Overall Rating	4.70

¹ Rating scale 1-5 with 1 = Strongly Disagree and 5 = Strongly Agree

Attachments: Workshop Agenda, Attendance Report



Construction Stormwater Inspector Workshop

Agenda

April 30, 2024

9:00-11:30 a.m.

Platform opens at 8:45 a.m. for logging in.

Topic/Activity	Speaker	Time
Log-in	• Troubleshoot your connection. • Complete the pre-workshop survey (if you haven't done so already).	8:45-9:00
Welcome and Introductions	Daniel Matlock, NDS Chair, City of Fremont	9:00-9:10
C.6 Requirements and BMPs	Michael Perlmutter, City of Oakland	9:10-9:45
Documenting Inspections	Daniel Matlock, City of Fremont	9:45-10:00
Inspection Exercise Breakout Groups	Sophie McFadin, Larry Walker Associates	10:00-10:30
BMP Implementation		10:30-10:55
Demolition Project BMPs	Mary Skramstad, City of Berkeley	
Creekside BMPs	Jen Stern, City of Oakland	
Regional Water Board Perspective	Joseph Monical, San Francisco Bay Regional Water Quality Control Board	10:55-11:15
Questions and Wrap up	• Complete the post workshop survey and evaluation	11:15-11:30

ACCWP Construction Stormwater Inspector Training April 30, 2024

Last Name	First Name	Organization
Douglas	Aaliyah	City of Alameda
Nowacki	Andreew	City of Alameda
Brown	Nick	City of Albany
Lam	David	City of Albany
ALONSO	JOSE	City of Berkeley
FIGUEROA	DIEGO	City of Berkeley
MacArthur	Matthew	City of Berkeley
Muktevi	Srinivas	City of Berkeley
skramstad	mary	City of Berkeley
Sanchez	Sandra	City of Berkeley
Statzell	Erik	City of Dublin
Ignacio	Nik	City of Emeryville
Matlock	Daniel	City of Fremont
Shih	Ken	City of Fremont
Sim	Michelle	City of Fremont
Wier	Elliot	City of Fremont
Ahmed	Haitham	City of Hayward
Faridi tavana	Ali	City of Hayward
pulu	paulo	City of Hayward
Titus	Geoff	City of Hayward
Whipple	Jason	City of Hayward
Wilfong	Elisa	City of Hayward
Del Rio	Miguel	City of Hayward
Taha	Mustafa	City of Hayward
Rasmussen	Jarrett	City of Livermore
Sendaydiego	Vincent	City of Livermore
Teczon	Rick	City of Livermore
avila	matthew	City of Newark
Cabeceira	Bryan	City of Newark
CARMEN	MICHAEL	City of Newark
Deshmukh	Vibha	City of Newark
Kreutzer	Karl	City of Newark
Reyes	Alysia	City of Newark
Banh	Hoang	City of Oakland
Candell	Chris	City of Oakland
Larks	Dennis	City of Oakland
Perlmutter	Michael	City of Oakland
Stern	Jennifer	City of Oakland
Sternkopf	Dan	City of Oakland
Ergun	Deniz	City of Piedmont

ACCWP Construction Stormwater Inspector Training April 30, 2024

Last Name	First Name	Organization
Buck	Michael	City of Pleasanton
Carlotti	Justin	City of Pleasanton
Nguyen	Tommy	City of Pleasanton
Peng	Lily	City of Pleasanton
Salcido	Miguel	City of Pleasanton
Schaffer	Michael	City of Pleasanton
Warning	Michael	City of Pleasanton
Al-Khalidi	Khalil	City of Pleasanton
Nolta	David	City of Pleasanton
Toledo	Bryan	City of Pleasanton
Vasquez	Alfredo	City of Pleasanton
Garcia	George	City of San Leandro
Guerrero	Jose	City of San Leandro
Magno	Robert	City of San Leandro
O'Connor	David	City of San Leandro
Peña	Alejandro	City of San Leandro
Ruiz Vera	Victor	City of San Leandro
Balisi	Willard	City of Union City
Cho	Tommy	City of Union City
Gutierrez	Jose	City of Union City
Kasper	Carly	City of Union City
Pulido	Antonio	City of Union City
Mao	Shu-Jon	Gannett Fleming (Consultant for City of Dublin)
Overton-Katz	Samantha	Gannett Fleming (Consultant for City of Dublin)
Avanesyan	Mher	Ground Zone Environmental Services (Consultant for County)
Brathwaite	Sam	Ground Zone Environmental Services (Consultant for County)
Flores-Martinez	Andy	Ground Zone Environmental Services (Consultant for County)
Jones	Tony	Ground Zone Environmental Services (Consultant for County)
Xiong	Tony	Ground Zone Environmental Services (Consultant for County)
Cholico	Zaida	Larry Walker Associates
Mathews	Sandy	Larry Walker Associates
McFadin	Sophie	Larry Walker Associates
Monical	Joseph	Regional Water Quality Control Board
Harris	Jerry	Zone 7 Water Agency
Sibal	Mariza	Zone 7 Water Agency
Li	Junming	Zone 7 Water Agency

Appendix E

Pesticide Toxicity Controls

ACCWP Our Water Our World Integrated Pest Management Retail Store Partnership Program

CASQA Our Water Our World Report

CASQA Pesticides Annual Report and Effectiveness Assessment



OUR WATER – OUR WORLD

Alameda Countywide Clean Water Program **Our Water Our World** **Integrated Pest Management Retail Store Partnership Program**

Final Report for contract fiscal year 2023-2024
Prepared by Suzanne Bontempo, Plant Harmony, July 2023

Program Overview

The 'Our Water Our World' (OWOW) program is a public outreach program designed to reduce the use of pesticides by using a point of purchase program that educates and encourages retail nurseries, hardware stores, and home improvement stores that sell pesticides, to provide less-toxic, eco-friendly products for their customers. In addition, the OWOW program provides Integrated Pest Management (IPM) educational Fact Sheets for the public. The reduction of pesticide usage or the use of less toxic products around the home can lead to a reduction of pollutants in our local creeks, as well as a healthier environment for the public.

Alameda Countywide Clean Water Program currently sponsors the Our Water Our World retail partnership program in 34 retail businesses throughout Alameda County. The OWOW program services are provided by me, and IPM Advocates; Charlotte Canner and Lisa Ratusz.

OWOW Retail Partners

This is the list of the OWOW Retail Partners as of June 30th, 2024:

Alameda

1. Encinal Nursery, 2057 Encinal Avenue
2. Encinal Hardware, 2801 Encinal Avenue
3. Ploughshares, 2701 Main Street

Albany

4. Flowerland, 1330 Solano Avenue

Berkeley

5. Ace Hardware, 2020 Milvia Street, Unit 100
6. Berkeley Horticultural Nursery, 1310 McGee Avenue
7. East Bay Nursery, 2332 San Pablo Avenue
8. Outdoor Supply Hardware, 1025 Ashby Avenue

9. Westbrae Nursery, 1272 Gilman Avenue

Castro Valley

10. Pete's Ace Hardware, 2569 Castro Valley Boulevard

Dublin

11. Alamo Ace Hardware, 7373 Village Parkway
12. Summer Winds Nursery, 7360 San Ramon Road

Emeryville

13. The Home Depot Store, 3838 Hollis Street

Fremont

14. Dale Hardware 3700 Thornton Avenue
15. The Home Depot Store, 43900 Ice House Terrace
16. Regan's Nursery, 4268 Decoto Road

Hayward

17. The Home Depot Store, 21787 Hesperian Boulevard

Livermore

18. Alden Lane Nursery, 981 Alden Lane
19. The Home Depot Store, 2500 Las Positas Road

Newark

20. The Home Depot Store, 5401 Thornton Avenue

Oakland

21. Broadway Terrace Nursery, 4340 Clarewood Drive
22. Cole Hardware, 5533 College Avenue
23. Grand Lake Ace Garden Center, 4001 Grand Avenue
24. The Home Depot Store, 4000 Alameda Avenue
25. Laurel Ace Hardware, 4024 MacArthur Boulevard
26. Montclair Village Nursery, 5048 Woodminister Lane
27. Yarrow Nursery, 6250 Thornhill Drive

Piedmont

28. Grand Lake Ace Hardware, 1221 Grand Avenue

Pleasanton

29. The Home Depot Store, 6000 Johnson Drive

30. Western Garden Nursery, 2756 Vineyard Avenue

San Leandro

31. Evergreen Nursery and Garden Supply, 350 San Leandro Boulevard

32. The Home Depot Store, 1933 Davis Street

33. Outdoor Supply Hardware, 300 Floresta Boulevard

Union City

34. The Home Depot Store, 30055 Industrial Parkway SW

Contract Deliverables

Summary of Tasks Completed for this Contract.

- Each retailer received at least 4 store maintenance and mentoring visits, and several received up to 10 store maintenance and mentoring visits. A total of 221 store visits were provided.
- Engaged with no less than a total of 212 customers during these store visits.
- OWOW shelf talker tags are placed to identify eco-friendly products at these retailers.
- Stock the OWOW rack with the 17 fact sheet topics, including topics in Spanish.
- The OWOW fact sheet QR Code poster is accessible to shoppers to use.
- Provided an OWOW training for the associates at 17 retailers training a total of 151 associates.
- Provided 10 in-person public outreach events, engaging with no less than 362 people.
- Provided 2 webinars, 16 attended in total, and these webinar recording have received a combined 33 views.



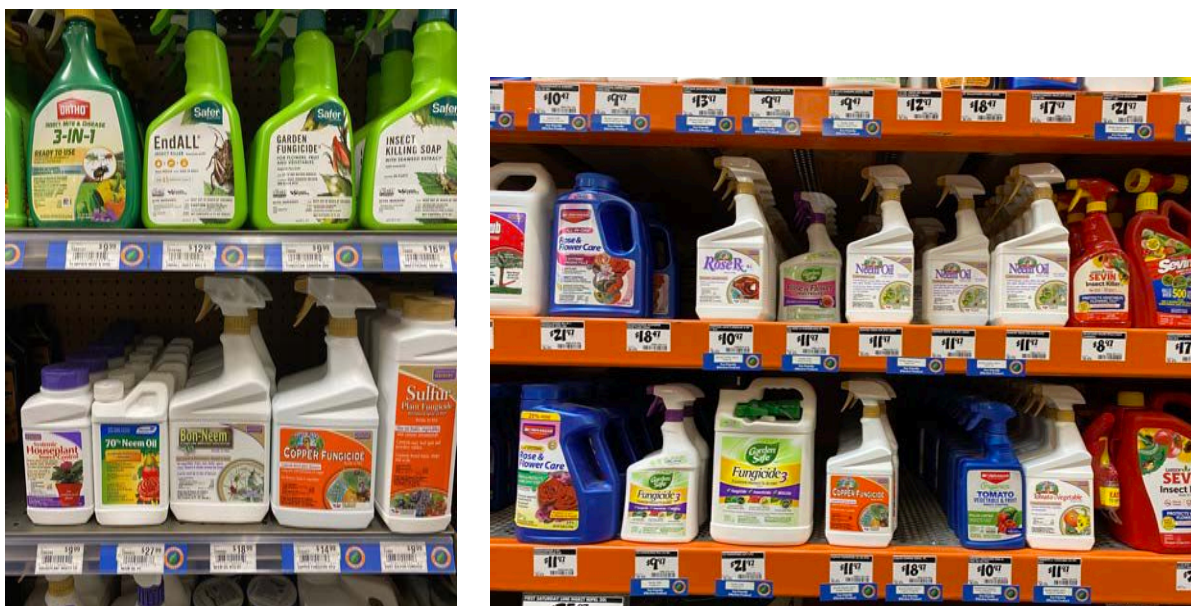
Mentoring associates throughout the year.
The Home Depot Store, Union City

OWOW tasks throughout the year

Store Set-up

Each retailer received new shelf talker tags to identify the eco-pesticides available for consumers to purchase. The Home Depot Stores physically remerchandise their products each winter. As for the other retailers, they might remerchandise and/or add new eco-products to the retail shelves for sale.

Retailers such as Berkeley Horticultural Nursery, Flowerland, Yarrow and Broadway Terrace Nursery only sell eco-friendly products so have declined the placement of shelf talker tags.



Placing new shelf talker tags on eco-pesticides at retailers throughout the OWOW partnership. Here are photos of shelf tags at the Laurel Ace, Oakland and the Home Depot Store, San Leandro

Retail Store Mentoring and Maintenance Visits:

A total number 221 program store mentoring and maintenance visits were provided for the year.

Retailer	Number of visits
Ace Hardware, Berkeley	4
Alamo Ace Hardware, Dublin	4
Alden Lane Nursery	6
Berkeley Horticultural Nursery	5
Broadway Terrace Nursery	7
Cole Hardware	7
Dale Hardware	10
East Bay Nursery	5

Encinal Hardware	4
Encinal Nursery	4
Evergreen Nursery and Garden Supply	9
Flowerland Nursery	4
Grand Lake Ace Garden Center	5
Grand Lake Ace Hardware	5
Home Depot, Emeryville	8
Home Depot, Fremont	9
Home Depot, Hayward	9
Home Depot, Livermore	7
Home Depot, Newark	9
Home Depot, Oakland	7
Home Depot, Pleasanton	10
Home Depot, San Leandro	6
Home Depot, Union City	9
Laurel Ace Hardware	8
Montclair Village Hardware	4
Outdoor Supply Hardware, Berkeley	7
Outdoor Supply Hardware, San Leandro	8
Pete's Ace Hardware	9
Ploughshares	4
Regan Nursery	7
Summer Winds Nursery	4
Westbrae Nursery	8
Western Garden Nursery	5
Yarrow	4

Store mentoring and maintenance activities throughout the year:

- Replenish fact sheets
- Update shelf talkers on new products
- Ask associates if they are hearing of any new or unusual pest problems from their customers
- Answer associate pest and product questions
- Focus on the pest of the month calendar
- Bring the quarterly UCIPM Retail Newsletter to each retailer
- Remind associates about the resource on the OWOW & UCIPM website
- Demonstrate how to use the UCIPM website for pest problem assistance
- Demonstrate how to access OWOW fact sheet through the QR code poster
- Guide customers to less-toxic solutions in the aisle
- Mentor buyer and manager at each retailer about new eco-friendly product on the market
- Mentor associates about the current pest problems and IPM strategies for the pests
- Mentor associates on how less toxic active ingredients work
- Follow up with emails and phone calls on pest questions from associates, as well as customers

Throughout the year, subcontractors Charlotte, Oliver, and I provided each store with mentoring and support around assorted seasonal pest, such as aphids, earwigs, and peach leaf curl, along with other leaf and plant diseases, especially around managing weeds and rodents. Flies, yellowjackets, gophers, and ants were also highlighted with many customers coming in the stores with these pests.

We continue to provide each retailer with more resources for pest prevention by planting the right plant in the right place, keeping plants healthy, how to efficiently water plants that reduces water usage, and the benefits of planting regionally appropriate plant material. This year, we provided extra resources and information for attracting beneficial insects to gardens to manage pests.

In the fall we provided each retailer with the BASMAA handouts for keeping rainwater on sight. In the spring we provided each with how to keep gardens healthy through times of drought. We provided each with the CA Pest Alert 'Keep the Spotted Lanternfly out of CA' to post, & the quarterly UC IPM Retailer Newsletter.

Fact sheets:

OWOW fact sheets are made available at each retailer in print form and/or digital form. These fact sheets provide the basic information for less-toxic pest management based off the information found on the UCIPM website. The OWOW fact sheets provide user friendly, easy to understand tools and techniques for pest management.

This is the current list of fact sheet available:

- Controlling **Ants** in Your Home
- Controlling **Aphids** in Your Garden
- Keep **Bed Bugs** Out of Your Home
- Keep **Cockroaches** Out of Your Home
- Keep **Fleas** Off Your Pets and Out of Your Home
- Planting a **Healthy Garden**
- Tips for a Beautiful, **Healthy Lawn**
- Protect Your Garden from **Moles, Voles and Gophers**
- Controlling **Mosquitoes** Around Your Home
- Hiring a **Pest Control Company**



OWOW Fact Sheet Rack with QR Code poster on display at the Home Depot, Livermore

- Keep **Rats and Mice** Out of Your Home
- Growing Beautiful **Roses**
- **Snails and Slugs** in Your Garden
- **Spiders** – The Helpful Hunters
- Pesticide **Use and Disposal**
- Controlling **Weeds** in Your Garden
- Controlling **Yellowjackets** Around Your Home



OWOW QR Code signage at Dale Ace, Fremont

QR Code signage for digital fact sheets

We have placed the QR Code posters or signage at most of the retailers. We currently have the QR code signage for Roses, Healthy Gardens, and the 10 Most Wanted brochure placed in the nurseries. In each associate training, we review how to access the OWOW and UCIPM websites in both English and Spanish by using the QR code signage so that associates feel comfortable using them with ease.

OWOW IPM Retailer Trainings

The OWOW trainings are designed to educate the associates about storm water runoff, where the local HHW facility is located, their role in reducing problem pesticide usage, the principles of IPM, how to read a pesticide label, the less toxic pesticides their store sells, proper usage of these pesticides, current pest problems and less toxic solutions for these problems for their customer. These trainings also provide suggested alternatives to their customers to manage their gardens sustainably with the intent to reduce the toxic pesticides and fertilizers that so easily can get into the waterways.

A total of 17 training events were provided with a total of 151 associates receiving the training. Each associate received a training folder stocked with reference materials, pest problem solving for the common seasonal pests they are asked about, OWOW Fact Sheets, Pest Identification key, and UCIPM Pest Notes for some of the current pest problems. Pre & Post Training Surveys were provided to each attendee.

Date	Store	Number Trained	Instructor
10/18/23	The Home Depot, Emeryville	10	Suzanne
10/25/23	UCIPM Bay Area Retailer Training	9	UCIPM & OWOW
11/3/23	Grand Lake Ace Garden Center	4	Charlotte
1/10/24	Dale Ace	28	Suzanne
1/17/24	Westbrae Nursery	6	Suzanne
2/2/24	Alden Lane Nursery	19	Charlotte
2/6/24	Broadway Terrace Nursery	3	Suzanne
2/6/24	Laurel Ace	3	Suzanne
2/9/24	Yarrow Nursery	6	Suzanne

2/8/23	Westbrae Nursery	5	Suzanne
2/29/24	Evergreen Nursery	6	Charlotte
3/5/24	Grand Lace Hardware	4	Charlotte
3/5/24	Home Depot, San Leandro	5	Charlotte
3/11/24	East Bay Nursery	16	Charlotte
3/15/24	The Home Depot, Oakland	7	Charlotte
4/2/24	OSH San Leandro	5	Charlotte
4/18/24	Pete's Ace	11	Suzanne
Total associates trained:		151	

Topics covered in the training:

- An OWOW partnership program overview
- Pesticides that are water pollutants of concern
- Where to dispose of local HHW
- 'How less-toxic products' work
- How to read a pesticide label
- IPM principles & techniques
- Beneficial Insect Identification
- Water Conservation
- Benefits of Compost
- Benefits of Mulch
- Water-wise plant choices for our area
- Pests highlighted: Aphids, ants, powdery mildew, citrus leaf miner, earwigs, fleas, gophers, rats & mice, snails & slugs, spider mites, whitefly, fungal diseases, codling moth, rose care without problem pesticides and how to address the many customer habits, such as how over fertilizing can increase pest populations. Also, the importance of adding compost to the soil and protecting the soil with a layer of mulch.
- Invasive pests: Asian Citrus Psyllid
- OWOW website, UC Davis IPM website



Training associates at Pete's Ace

Resources provided to each OWOW training attendee includes:

- The Mac's Field Guide Good Garden Bugs of California
- Monthly Pest Calendar
- How to Apply Beneficial Nematode
- 'How Less Toxic Products Work' handout
- Home Depot less toxic product list for the Home Depot Store training
- List of websites, books, and catalogs on a resource sheet
- Sheet Mulching instructions
- The CA DPR's 'How to read a pesticide label' handout
- Information on pest problem solving for the following pests: spider mites, lifecycle of grubs, whiteflies, spider mites, citrus leaf miner, codling moth, keeping rodent out of the

home and reducing their activity in the garden, Asian Citrus Psyllid, and the UCIPM Quick tips for Mealybugs & Powdery Mildew

- '10 Most Wanted Bugs for Your Garden' brochure
- OWOW pocket guides
- A one sheet informational handout on 'Protecting Landscapes in a Drought' and '10 Tips for Water-wise Gardening'
- A one sheet informational handout on 'Keeping Rats & Mice out'
- A one sheet informational handout on 'Rats in the Garden'
- Invasive Pests: Asian Citrus Psyllid
- 'Keep Spotted Lanternfly Out of California' brochure
- Eco-herbicide recommendations
- Retail Nursery & Garden Center IPM News
- A one sheet handout that includes services offered by the Alameda County Mosquito Abatement District and the Alameda County Vector Control Program

Compilation of Training Feedback 2023-24 contract year

Though getting managers to agree to schedule trainings is more challenging that before due to labor shortages and the late rainy season, the training classes are well received by the associates, they see the value and appreciate the up-to-date IPM education we provide to them. We continued to focus our attention on how to guide their customers through the importance of keeping rainwater on site, adding compost to the soil, feeding plants organically, protecting the soil with mulch, and how to water to grow healthy plants, because when we grow healthy plants, they are more resilient and less likely to be affected by pest issues.



Training associates at Home Depot, Pleasanton



Training associates at Laurel Ace

Program Training Assessment

Summary of Store Training Pre-Training Surveys

A total of 151 associates trained and 127 pre-training surveys were returned.

Here are the results of those surveys:

1) Are you familiar with the OWOW program?
a) Yes: 46% b) No: 54%
2) When does urban runoff occur?
a) When a sprinkler is broken & excess water is running into the street: 3% b) During & after a rain event: 5% c) From watering or irrigation overflows: 3% d) All of the above: 85% e) I'm not sure: 4%
3) Which of these pollutants can be carried into the waterways with urban runoff?
a) Motor oil & solvents: 2% b) Pet waste, debris & litter: 2% c) Pesticides & synthetic fertilizers: 7% d) Household cleaning agents: 2% e) All of the above: 87% f) I'm not sure:
4) Storm drains, including the storm drains in parking lots & loading docks, flow directly to:
a) The sanitary sewer that goes to the wastewater treatment facility: 20% b) The nearest creek, river, bay, or ocean: 58% no answer: 22%
5) Are pesticides removed at the wastewater treatment facility?
a) Yes: 20% b) No: 39% c) I'm not sure: 41%
6) What is the best way to dispose of unused household hazardous waste, including pesticides & fertilizers?
a) Bury them in the garden: 1% b) Dump them into the trash: 3% c) Pour them down the sink or flush down toilet: 1% d) Take them to the local HHW facility: 95% e) I'm not sure:
7) Do you know where your local HHW facility is located?
a) Yes, I do know: 30% b) No, I don't know: 70%
8) Do your customers ask for eco-friendly solutions & less-toxic products that are safer for the environment?
a) Yes: 43% b) No: 9% c) Sometimes: 48%
9) What is the highly effective, science-based strategy for controlling pests in the home/garden that also helps to protect our waterways from toxic pesticide pollutants?
a) Synthetic pesticide program: 3% b) Homemade, D.I.Y. remedies & cures: 10% c) IPM (Integrated Pest Management) Principles: 68% d) I'm not sure: 19%

Summary of Store Training Post-Training Surveys

A total of 151 associates trained and 120 post-training surveys were returned.

Here are the results of those surveys:

1) Are you familiar with the OWOW program
a) Yes: 98% b) No: 2% - No response:
2) When does urban runoff occur?
a) When a sprinkler is broken & excess water is running into the street: b) During & after a rain event: c) From watering or irrigation overflows: d) All of the above: 100%
3) Which of these pollutants can be carried into the waterways with urban runoff?
a) Motor oil & solvents: b) Pest waste, debris & litter: c) Pesticides & synthetic fertilizers: d) Household cleaning agents: e) All of the above: 100%
4) Storm drains, including the storm drains in parking lots & loading docks, flow directly to:
a) The sanitary sewer that goes to the wastewater treatment facility: 1% b) The nearest creek, river, bay, or ocean: 99% c) I'm not sure:
5) Are pesticides removed at the wastewater treatment facility?
a) Yes: 2% b) No: 97% c) I'm not sure: 1%
6) What is the best way to dispose of unused household hazardous waste, including pesticides & fertilizers?
a) Bury them in the garden: b) Dump them into the trash: c) Pour them down the sink or flush down toilet: 1% d) Take them to the local HHW facility: 99%
7) Do you know where your local HHW facility is located?
a) Yes, knew: 99% b) No, did not know: 1%
8) How can you identify products that are less toxic for pest management in your store?
a) The OWOW shelf labels that identify eco-friendly products: 1% b) The OWOW pest management fact sheets: 1% c) The OWOW website at www.ourwaterourworld.org d) Talking with an OWOW IPM Advocate: 1% e) All of the above: 97%
9) What is the highly effective, science-based strategy for controlling pests in the home/garden that also helps to protect our waterways from toxic pesticide pollutants?
a) Synthetic pesticide program: b) Homemade, D.I.Y. remedies & cures: 1% c) IPM (Integrated Pest Management) Principles: 99%

Summary of End of Training Evaluation Form.

1) You feel comfortable using the OWOW resources available in this store?
a) Yes: 100%
b) No:
2) You understand a less toxic solution for at least one pest problem discussed today.
a) Yes: 100%
b) No:
3) What type of support can the OWOW IPM Advocate provide you more of?
a) More print & online resources for less toxic pest management: 16%
b) More information about seasonal pest problems and how to manage less toxically: 39%
c) More OWOW training & product knowledge classes: 45%

What was the most useful thing you learned today?

'Learning how to increase the health of the garden to reduce pests.'

'Learning about IPM.'

'Learning about the blue shelf tags indicate eco-friendly products.'

'How to water plants correctly to reduce/prevent pest issues.'

'Everything was helpful.'

'Learning when to use different pesticides and how to use them.'

'Learning how the active ingredients work and when/how to apply them.'

'Managing roaches and ants.'

'Learning about the impacts of pesticides and water quality.'

Additional comments:

'It was great.'

'Thanks for the information!'

'Great class! Very informative'

'I learned a lot in this class. Thank you!'

'Thank you so much!'

'Great presentation, learned a lot.'



Training associates at OSH, San Leandro



Training associates at the Broadway Terrace Nursery

Public education & outreach

Throughout the year, we provided 12 public outreach events; 10 in-person events engaging with no less than 362 people, 2 educational webinars with 16 attendees and 33 views of the recording on the Clean Water Program Alameda Co YouTube channel as of June 30th, 2024.

Date	Event Type & Location	Number of people engaged
8/26/23	OSH San Leandro: in-person event	20
10/8/23	Western Garden: in-person event	20
10/14/23	Alden Lane Nursery: in-person event	50
2/24/24	Evergreen Nursery: in-person event	25
2/24/24	Northwest Dahlia Conference: in-person presentation	80
4/6/2024	Pete's Ace: in-person event	34
4/17/24	Webinar: 'Gardening in a Changing Climate'	10 attended, 26 registered, 22 views on CWP YouTube channel
4/26/24	City of Piedmont's Arbor Day Event: In-person	43
5/4/24	Evergreen Nursery: in-person event	29
5/15/24	Webinar: 'Eco-friendly Pest Management'	6 attended, 8 registered, 11 views on CWP YouTube channel
5/16/24	Las Positas College: virtual presentation	26
5/25/24	OSH San Leandro: in-person event	30

Public Tabling Events:

The outreach tabling events consisted of assisting people either in the aisle at the retailer, answering their pest & gardening questions, and guiding each to a less toxic solution. This engagement educates the consumer and guiding each towards less toxic pesticides and products. The encouraging shift is seeing that most of the people are asking for alternatives to the problem pesticides.

Topics discussed include:

- Managing aphids and other common garden pests
- Managing rats and mice, both indoors and outdoors
- Flying insects; flies, mosquitoes, yellowjackets, fungus gnats
- Gophers and moles in the garden
- Crawling insects in the home, and around the perimeter



Tabling at the Pete's Ace

- Fungus gnats in houseplants
- Weeds in the garden, showing the different tools such as mulch, as well as the eco-herbicides.
- Fruit Tree care, Citrus care, Rose Care, Veggie Garden care
- Plant diseases; powdery mildew, peach leaf curl, black spot, rust
- Best fertilizers to feed plants.
- How to water

Each person received a corresponding OWOW fact sheet when available, OWOW & UCIPM website information, the '10 Most Wanted Good Bugs' brochure, and the 'Healthy Gardens' fact sheet.



Tabling at Alden Lane

Public Presentations:

The California Dahlia Association invited me to provide a presentation on the OWOW program and managing powdery mildew with a less toxic approach. This conference was held at the Senior Center in San Leandro. Over 80 guests attended, the majority joining from the Bay Area.

The Las Positas College, in Livermore, Sustainable Landscape Professor invited me to give a virtual presentation on the OWOW program, which was followed by a dynamic Q&A session with the 26 students who joined that day. The professor met me at the NorCal Landscape and Nursery Conference and was impressed by the OWOW program.

Public Webinar Events:

The OWOW webinars are presented by me and Charlotte. I send an invitation email to pest registrants. Prior to every webinar each registrant received an email from me that included a program outline, and a 'Helpful Gardening Resource' page. This was created to help the guest with writing notes and help them pay attention without needing to scramble to note each website references throughout the program. Each attendee receives a post program survey evaluation to complete. All registrants and attendees receive an email from me with link to webinar recording and registration information for upcoming webinar scheduled. I send Myer all the post program data and recording once received.

Though the webinars registration and attendance were surprising low, the recordings are currently receiving views.

Webinars from the 2021-23 fiscal years are still receiving views:

Date	Type of Event	Number of Attendees
7/8/21	Gardening During Drought – Webinar	173 views on CWP YouTube 21 more views since July 2023
8/12/21	Vegetable Pest Management - Webinar	85 views on CWP YouTube,

		2 more views since July 2023
9/9/21	Fall is for Planting - Webinar	61 views on CWP YouTube, 3 more views since July 2023
1/13/22	Managing Weeds Effectively – Webinar	167 views on CWP YouTube, 5 more views since July 2023
2/10/22	Organic Rose Care - Webinar	154 views on CWP YouTube, 10 more views since July 2023
3/10/22	Soil Basics – Webinar	100 views on CWP YouTube, 7 more views since July 2023
4/14/22	Waterwise Food Gardening – Webinar	87 views on CWP YouTube, 10 more views since July 2023
5/12/22	Spring Pest Management – Webinar	143 views on CWP YouTube, 18 more views since July 2023
6/9/22	Bring in the Pollinators - Webinar	206 views on CWP YouTube, 13 views since July 2023
10/13/22	Webinar: 'Fall is for Planting'	112 views on CWP YouTube, 10 more views since July 2023
11/10/22	Webinar: 'Fall Pest Prevention'	90 views on CWP YouTube, 13 more views since July 2023
2/16/23	Webinar: 'Managing Weeds'	150 views on CWP YouTube, 15 views since July 2023
3/16/23	Webinar: 'Setting Garden Up for Success'	153 views on CWP YouTube, 16 views since July 2023
4/13/23	Webinar: 'Gardening for the Good Bugs'	344 views on CWP YouTube, 40 views since July 2023
5/11/23	Webinar: 'Spring Pest Management'	121 views on CWP YouTube, 24 views since July 2023

The recorded webinars have received a total of **240 views throughout this 2023-24** contract year.

In total, since these webinar recordings have been posted on the Clean Water Program's YouTube Channel, they have received a total of **2179 views**.

OWOW content for Social Media Posts:

Throughout the contract year I provided 4 bilingual IPM tips were provided throughout the contract year:

- What is OWOW?
- What is IPM?
- Look for shelf talkers and make a difference
- What are dormant sprays?



OWOW's Retail Influence

Eco-friendly Pesticide Increases

Throughout the 2023-24 fiscal year, all retailers continue to increase the number of eco-friendly pesticides as they decrease their problem pesticide inventory for the alternatives.

- Yarrow, Flowerland, Berkeley Horticultural Nursery, Broadway Terrace Nursery only sell eco-friendly products.
- Each of the retails have witnessed an increase in sales with the eco-friendly alternative pesticides. This is a significant increase in response to the consumer demand.
- All stores value the OWOW program and the services we provide.

OWOW Program Evaluation

Fact Sheets Displayed:

- All 34 retailer have a fact sheet rack and/or fact sheet QR code signage on display for their customers to reference.
- 80% noted: The fact sheet is very effective.
- 68% noted: The print fact sheet information is more effective.
- 32% noted: The QR codes to views the fact sheets digitally is better.
- 40% noted: Both print and digital facts sheets are preferred.

Shelf Taker Tags:

- 100% of the retailers noted that the shelf talker tags are very effective, they really help us identify the eco-friendly products we sell.

OWOW Retailer Trainings:

- 100% of the retailers noted that the OWOW trainings are very valuable, feel that they are an important addition to staff enrichment and would like them more often when possible.

OWOW Outreach Events:

- Each of the retailers who have had us join their events, said that they value our time when we are working in the store, helping their customers. Many have requested that OWOW join again next year at an in-person outreach customer event.

Overall challenge for the year:

This was a particularly challenging year due to each of our personal and family situations. Thankfully Oliver was able to join our team, to assist with OWOW services, before leaving to graduate school. Charlotte and I persisted with scheduling OWOW trainings and outreach events, though due to the extended rainy season and lower staffing at most retailers, both were difficult to complete. I did

however expand the public outreach efforts by presenting at the Dahlia Conference and at the Las Positas College. Both new venues for us and the OWOW message.

The next disappointment is the attendance of webinars dropped significantly. It is completely understandable why people have zoom fatigue. However, I am impressed by the number of views the abundant library of recorded webinars continues to receive. This is key benefit of providing the OWOW education in the webinar format, they are recorded for future viewing.

Providing OWOW Services Beyond the Retailer

Professional Events

BFG Marketplace EXPO, Reno Event Center

October 10th – 12th, 2023

OWOW was invited to join this in-person garden industry retailer event. Joining this event gives OWOW the opportunity to spread the clean water message, meet with pesticide vendors to learn about the eco-friendly products they sell, to see new products entering the marketplace, and to meet with the retail buyers to assist them with eco-friendly alternatives for them to sell at their business. I was invited to provide an OWOW presentation on Wednesday of this event.

Over the 3 days of this show, we spoke with hundreds of retailers.

NorCal Landscape & Nursery Show, San Mateo Event Center

February 8th, 2024

Happy to join this landscape and nursery professional show. This show is for landscape workers, city parks workers, landscape designer, professional gardeners and any other in the professional garden industry. During this one-day show we speak with over 200 professionals, sharing with them the OWOW message, information and education around less-toxic pest management, and distribute fact sheets and OWOW website information to all who visit our booth.

Closing comments:

Each of the retailers have been great to work with. All of the associates are very open to learning about the OWOW program partnership, the new eco-products they sell, tips for less toxic pest management, and how to better support their customers. Each year the ecofriendly product interest seems to increase, with more awareness for less toxic choices requested by the consumer.

The retailers love the OWOW program and appreciate the partnership. Charlotte, and I have continued to develop strong relationships with these stores and continue to cater the information to their needs.

In close, I'd like to thank you for the opportunity to provide OWOW services on behalf of the Alameda Countywide Clean Water Program. I very much appreciate being able to reduce pesticide pollutants by

sharing IPM knowledge, by offering support around stressful pest problems, and by being available to guide folks to less toxic, sustainable pest & gardening solutions.

Thank you so much for allowing me to contract with you.

With great appreciation,

Suzanne Bontempo



California Stormwater Quality Association®

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

Our Water Our World 2024 Annual Report

Prepared by the California Stormwater Quality Association

August 2024

Preface

ADVANCING SUSTAINABLE STORMWATER MANAGEMENT

The California Stormwater Quality Association (CASQA) is a nonprofit corporation that advances sustainable stormwater management protective of California water resources. With well over 2,000 members, CASQA's membership is comprised of a diverse range of stormwater quality management organizations and individuals, including cities, counties, special districts, federal agencies, state agencies, ports, universities and school districts, wastewater agencies, water suppliers, industries, and consulting firms throughout the state. Collectively, CASQA represents over 34 million people in California.

CASQA's [*Vision for Sustainable Stormwater Management*](#)¹ (Vision) defines the actions needed to manage stormwater as an essential component of the state's water resources, support human and ecological needs, protect water quality, and enhance and restore California's waterways. There are four guiding principles to achieve this Vision. Like the legs of a chair, each Principle is essential and all four must be in place to support the whole.

Principle #1: Program Implementation: Projects and programs that use stormwater as a resource, protect water quality and beneficial uses, and efficiently minimize pollution are critical for sustainable stormwater management. Stormwater capture and true source control (identifying and mitigating a pollutant at its source) are the primary drivers of these solutions, with effective BMPs providing an important supportive role.

Principle #2: Permits, Regulations, and Legislation: Permits, regulations, and legislation need to focus on effectiveness and desired outcomes to support sustainable stormwater management. Regulatory and legislative actions must align with and support the other components of the Vision – advancing stormwater capture, true source control, and effective BMPs, increasing public education and awareness focused on stormwater as a resource, and securing funding to support these solutions.

Principle #3: Public Education: Public awareness, understanding, and support is essential to sustainable stormwater management. The key shift is viewing stormwater as a resource that must be protected and integrated into overall water resource management.

Principle #4: Funding: Significant financial investment is required to achieve sustainable stormwater management. Stormwater is the most underfunded portion of the water sector and substantial funding is needed to bring these solutions forward.

OUR WATER, OUR WORLD ANNUAL REPORT

The Our Water, Our World (OWOW) program advances Principle #1 by focusing on true source control to address the use of Current Use Pesticides. CASQA has identified Current Use Pesticides as a [*Water Quality Priority*](#), requiring solutions at a statewide scale. OWOW also advances Principle #3 through its public education components. The goal of OWOW is to support a statewide integrated pest management (IPM) outreach program that provides direct to consumer information and education on less-toxic IPM practices. This report describes the OWOW program activities from July 2023 through June 2024.

Acknowledgements

This report was prepared by CASQA with support from Suzanne Bontempo.

OWOW is funded by CASQA, the organizations implementing the OWOW program (see Table 1 in Section 2 of this report) and is sponsored by the Bay Area Clean Water Association (BACWA).

¹ [https://www.casqa.org/wp-content/uploads/2022/10/final - vision for sustainable stormwater management - 10-07-2020.pdf](https://www.casqa.org/wp-content/uploads/2022/10/final-vision-for-sustainable-stormwater-management-10-07-2020.pdf)

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Section 1. Introduction

Our Water, Our World (OWOW) is an award-winning partnership between municipal agencies and garden centers and hardware stores that sell pest control products. Initiated in 1998, the program focuses on less-toxic, eco-friendly products and techniques as many common pesticides are harmful to sensitive species and ecosystems when they reach local creeks, bays, and the ocean.

OWOW started as a pilot project in 1998, in just a handful of stores, initiated by the Central Contra Costa County Sanitation District, the City of Palo Alto Regional Water Quality Control Plant, and the Marin Countywide Stormwater Pollution Prevention Program. The program quickly grew and was administered by the former Bay Area Stormwater Management Agencies Association from 1999 – 2021. During that time, over 130 agencies in 16 counties implemented the program, working in approximately 239 stores. Starting in January 2022, the program was transferred to the California Stormwater Quality Association (CASQA), with the goal of providing statewide access to this important and successful outreach program.

From a stormwater management perspective, OWOW is an excellent opportunity and cost-efficient way to educate the public and reduce toxicity in waterways from current use pesticides. Several municipalities utilize OWOW to meet permit requirements, including the San Francisco Bay Area Municipal Regional Permit², the Central Valley Region-wide MS4 Permit³, and the Phase II – Small MS4 General Permit⁴.

Section 2. Program Elements

The OWOW program consists of several elements, which are integral to its effectiveness.

2.1 INTEGRATED PEST MANAGEMENT (IPM) ADVOCATES

IPM Advocates are individuals who have been trained on how to engage with retailers and the public. They provide local implementation of the program on behalf of participating agencies. Local implementation generally consists of coordinating with participating retailers to provide in-store displays, shelf tags, in-store presentations and training, and advice to customers about pest management methods that are healthier for people and the environment. Additionally, IPM Advocates receive annual continuing education and training.

2.2 EDUCATIONAL MATERIALS

In the store, consumers are directed to less-toxic products and techniques through:

- Fact sheet displays near pest products to educate the public on a wide range of pest management topics.
- Shelf tags to guide customers to less-toxic products.
- Display posters with QR codes linking directly to the [OWOW website](#) and fact sheets.

² Municipal Regional Stormwater NPDES Permit, California Regional Water Quality Control Board – San Francisco Bay Region, 2022. Order R2-2022-0018, NPDES NO. CAS612008, as amended, CA.

³ NPDES Permit and Waste Discharge Requirements General Permit for Discharges from MS4s, California Regional Water Quality Control Board – Central Valley, 2016. Order R5-2016-0040, NPDES NO. CAS0085324, CA

⁴ NPDES Permit and Waste Discharge Requirements for Storm Water Discharges from Small MS4s, California State Water Resources Control Board, 2013. Water Quality Order 2013-0001-DWQ, NPDES General Permit No. CAS0000004, as amended, CA.

On the OWOW website, consumers can view the following:

- All 18 fact sheets.
- Stores participating in the OWOW program.
- Lists of less-toxic products and active ingredients.

2.3 TRADE SHOWS

OWOW representatives provide exhibits annually at trade shows to educate store buyers on less-toxic products. Participation in these events helps ensure stores carry less-toxic products.

Section 3: Partnerships

The program is administered by CASQA, implemented by local cities and counties, with IPM Advocates and University of California Statewide IPM Program (UC IPM) serving as collaborative partners.

CASQA manages and provides the central services necessary to operate and maintain the OWOW program, including the development of education materials (e.g., less-toxic product lists, label files, and active ingredient lists), creation and updates of outreach materials, operation and updates to the OWOW website, vendor (i.e., retail partners and pesticide distributors) outreach, preparation of an annual report, fulfillment of outreach materials orders, and program management and development.

Municipal agencies subscribe to OWOW through CASQA and implement the OWOW program in their local retail stores by contracting with IPM Advocates, using municipal staff or other contractors. Implementation may occur by a single agency at stores within their jurisdiction or organized at a regional scale, where agencies combine resources to implement the OWOW program at select stores used by multiple jurisdictions. In addition, municipal agencies conduct outreach to inform residents about the OWOW program. Table 1 provides the list of agencies implementing OWOW as of June 30, 2024. Bay Area Clean Water Agencies (BACWA) continues to support the OWOW program as a sponsor.

IPM Advocates are trained individuals that support local implementation of the OWOW program. They provide retail stores, nurseries, hardware stores, and garden centers direct to consumer information IPM tools, products, and practices. IPM Advocates are the link between the municipalities and the retailers where they reach consumers. Suzanne Bontempo was contracted by CASQA to coordinate the IPM Advocates to keep continuity within the program, hold regular meetings to communicate updates on new pests and new pest management techniques, update less-toxic product lists, and maintain the outreach material. The active IPM Advocates include Suzanne Bontempo, Julie Barbour, and Maris Sidenstacker.

The UC IPM Program provides research and expertise on IPM practices promoted throughout the state and maintains a website of less-toxic IPM for nearly 1,000 home, garden, landscape, and turf pests. Karey Windbiel-Rojas, Associate Director for Urban and Community IPM, UC IPM Program has been involved with the IPM Advocate program since its inception and continues to assist with advocate training, technical resources on pest management practices, and as a liaison with UC resources.

Table 1. Agencies Implementing OWOW

Bay Area and Northern California

Alameda County

Alameda County Flood Control & Water Conservation
District

Alameda Countywide Clean Water Program

City of Alameda

City of Albany

City of American Canyon

City of Antioch

City of Belmont

City of Belvedere

City of Benicia

City of Berkeley

City of Brentwood

City of Brisbane

City of Burlingame

City of Calistoga

City of Campbell

City of Clayton

City of Cloverdale

City of Concord

City of Cotati

City of Cupertino

City of Daly City

City of Dublin

City of East Palo Alto

City of El Cerrito

City of Emeryville

City of Fairfield

City of Foster City

City of Fremont

City of Half Moon Bay

City of Hayward

City of Healdsburg

City of Hercules

City of Lafayette

City of Larkspur

City of Livermore

City of Los Altos

City of Martinez

City of Menlo Park

City of Mill Valley

City of Millbrae

City of Milpitas

City of Monte Sereno

City of Mountain View

City of Napa

City of Newark

City of Novato

City of Oakland

City of Oakley

City of Orinda

City of Pacifica

City of Palo Alto

City of Petaluma

City of Piedmont

City of Pinole

City of Pittsburg

City of Pleasant Hill

City of Pleasanton

City of Redwood City

City of Richmond

City of Rohnert Park

City of San Bruno

City of San Carlos

City of San Jose

City of San Leandro

City of San Mateo

City of San Pablo

City of San Rafael

City of San Ramon

City of Santa Clara

City of Santa Rosa

City of Saratoga

City of Sausalito

City of Sebastopol

City of South San Francisco

Bay Area and Northern California (Continued)

City of St. Helena

City of Suisun City

City of Sunnyvale

City of Ukiah

City of Vallejo

City of Walnut Creek

Contra Costa Clean Water Program

Contra Costa County

Contra Costa County Flood Control and Water
Conservation District

Fairfield-Suisun Sewer District

Marin County

Marin County Flood Control and Water Conservation
District

Marin Countywide Stormwater Pollution Prevention
Program

Mendocino County

Napa County

Napa County Flood Control and Water Conservation
District

Napa Countywide Stormwater Pollution Prevention
Program

Russian River Watershed Association

San Mateo County

San Mateo Countywide Water Pollution Prevention
Program

Santa Clara County

Santa Clara Valley Urban Runoff Pollution Prevention
Program

Santa Clara Valley Water District (Valley Water)

Solano Stormwater Alliance

Sonoma County

Sonoma County Water Agency

The San Mateo County Flood and Sea Level Rise
Resiliency District

Town of Atherton

Town of Colma

Town of Corte Madera

Town of Danville

Town of Fairfax

Town of Hillsborough

Town of Los Altos Hills

Town of Los Gatos

Town of Moraga

Town of Portola Valley

Town of Ross

Town of San Anselmo

Town of Tiburon

Town of Windsor

Town of Woodside

Town of Yountville

Union City

Vallejo Flood and Wastewater District

Zone 7 Water Agency

Central Valley, Tahoe, and Inland Areas

Butte County

City of Ceres

City of Citrus Heights

City of Davis

City of Dixon

City of Elk Grove

City of Escalon

City of Folsom

City of Galt

City of Lathrop

City of Lincoln

City of Lodi

City of Manteca

City of Merced

City of Modesto

City of Newman

City of Patterson

City of Rancho Cordova

City of Ripon

City of Riverbank

City of Rocklin

City of Roseville

City of Sacramento

City of Stockton

City of Tracy

City of Turlock

City of Woodland

Central Valley, Tahoe, and Inland
Areas (Continued)

City of Yuba City

El Dorado County

Fresno Metropolitan Flood Control District

Mountain House Community Service District

Sacramento County

Sacramento Stormwater Quality Partnership

San Joaquin County

Stanislaus County

Central Coast

City Buellton

City of Buellton

City of Carmel-by-the-Sea

City of Carpinteria

City of Del Rey Oaks

City of Goleta

City of Guadalupe

City of Lompoc

City of Marina

City of Monterey

City of Pacific Grove

City of Sand City

City of Santa Barbara

City of Santa Maria

City of Seaside

City of Solvang

Monterey Regional Storm Water Management
Program

Monterey County

Santa Barbara County

Southern California

City of Santa Clarita

Sponsor

Bay Area Clean Water Agencies
(BACWA)

Section 4. Annual Program Implementation

This section describes the OWOW outreach services conducted between July 2023 and June 2024.

4.1 IPM ADVOCATES

After training by the University of California IPM Program, IPM Advocates are contracted by local municipalities and then assigned to stores, where they share their knowledge with staff and hold educational events for customers. Excellent relationships between the IPM Advocates and store management and staff are key to the successful promotion of less-toxic, eco-friendly products.

IPM Advocate Coordination

IPM Advocate coordination meetings were held throughout the year to communicate updates on new pests and new pest management techniques. Additionally, municipal agency staff and contractors that implement the in-store component of the OWOW program were invited to these coordination meetings to learn best practices for developing and maintaining store partnerships.

4.2 EDUCATIONAL OUTREACH MATERIALS

Educational materials include fact sheets for specific pests, gardening and pesticide applications, shelf tags to identify eco-friendly products in stores, and the OWOW website that makes the materials accessible to the public. Examples of OWOW outreach materials are provided in Appendix A and all are accessible on the [OWOW website](#).

Fact Sheets

The OWOW program has 18 fact sheets. Between July 2023 and June 2024, the *Ants*, *Yellowjackets*, *Pesticides and Water Quality*, and *Fleas* fact sheets were revised and translated into Spanish. The *Yellowjackets*, *Pesticides and Water Quality*, and *Fleas* fact sheets were new Spanish translations. Currently, 7 of the 18 fact sheets are available in Spanish, and efforts are underway to translate the entire fact sheet series. Additionally, QR codes were added to the revised and translated factsheets to help consumers easily navigate to the OWOW website.

In January 2022, posters with trackable QR codes were developed to encourage consumers to digitally access the OWOW fact sheets in pesticide aisles. These trackable QR codes record which fact sheets are viewed by consumers in retail stores. According to the data from the QR code posters, between July 2023 and June 2024, the three most viewed fact sheets were *Moles, Voles, and Gophers*, *Ants*, and *Rats and Mice*. Table 2 presents a summary of QR code scans for each fact sheet. Additionally, Figure 1 shows the frequency of QR code scans per month for the reporting period. Year over year, the QR code scans have increased 36%, from 2,145 scans between July 2022 and June 2023 to 2,929 scans between July 2023 and June 2024. This year over year increase indicates heightened consumer engagement with the OWOW program.

Website

The [OWOW website](#) provides public access to the fact sheets, the less-toxic product list, and the Store Finder, which is an interactive map to search for participating stores. Updates to the [Store Finder](#) are made on a quarterly basis. During the 2023 – 2024 reporting year, 7 stores were added to the OWOW program and made available on the Store Finder. Year over year, website visitors have increased 11%, from 15,702 unique visitors between July 2022 and June 2023 to 17,467 unique visitors between July 2023 and June 2024.

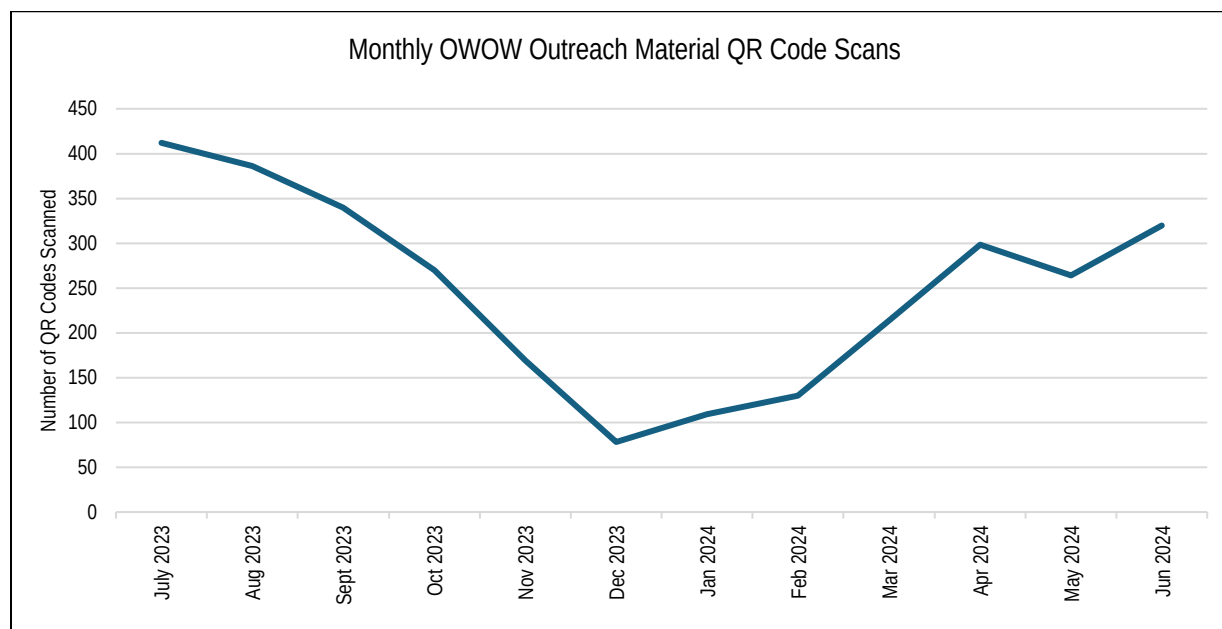
Store-based Product Lists

The store-based product lists provide the current lists of the eco-friendly products that The Home Depot and Ace Hardware stores sell each year. IPM Advocates use the store-based product lists to identify the eco-friendly products on store shelves using “shelf talkers.” Each year, the product lists are reviewed, and updates are made as needed in consultation with subject matter experts. Appendix B provides the product lists for 2024.

Table 2. QR Code Scans by OWOW Product from July 2023 to June 2024

OWOW Product	QR Code Scans	OWOW Product	QR Code Scans
Moles Voles Gophers	393	Healthy Gardens	121
Ants	243	10 Most Wanted	116
Aphids	225	Weeds	106
Rats & Mice	219	Yellowjackets	84
Cockroaches	217	Bed Bugs	73
Snails & Slugs	187	Spanish Fact Sheets	33
Mosquitoes	181	Lawns	27
Spiders	173	Hiring a Pest Company	21
Fleas	165	Pesticide Use & Disposal	21
OWOW Website	157	Pesticides & Water Quality	11
Roses	156		
Total QR Code Scans		2,929	

Figure 1. Monthly OWOW Outreach Material QR Code Scans between July 2023 and June 2024



4.3 VENDOR OUTREACH

Education of vendors and retailers on less-toxic products is a critical step to ensure stores carry less-toxic products.

Retail Partners

The OWOW program grew retail partnerships by six (6) stores during the 2023 – 2024 reporting year, resulting in a total of 288 retail stores participating in the OWOW program. The Home Depot Corporate continues to be a model retail partner and OWOW strives to replicate this partnership with other retailers and vendors. In February 2024, CASQA sent a letter to The Home Depot Corporate Sustainability Officer thanking them for their long-standing partnership with the OWOW program (see Appendix D). In March 2024, The Home Depot delivered an internal memorandum to California store managers to facilitate annual collaboration in The Home Depot stores (see Appendix E). Besides The Home Depot, OWOW retail partners include Outdoor Supply Hardware, Ace Hardware, and independent hardware and garden centers throughout California.

Trade Show Booths

Attending trade shows provides an opportunity to meet vendors, learn about the new products coming to the California marketplace, answer questions, and provide mentorship to the retail buyers. In 2023 – 2024, OWOW representatives attended the following trade show events:

- BFG Marketplace Expo, Reno, NV, October 2023 – Retailer Show
- Northern California Home & Garden Show, Sacramento CA, February 2024 – Consumer Show
- NorCal Landscape Trade Show, San Mateo, CA, February 2024 – Landscape & Garden Professional Show

4.4 TRAINING AND OUTREACH FOR RETAILERS AND CONSUMERS

IPM Advocates and local municipal agency staff/consultants conduct OWOW outreach activities to educate retailers and consumers at the local level. Local OWOW implementation activities vary between agencies. Many agencies receive tailored OWOW reports from their contracted IPM Advocate with a summary of their local OWOW data (for example, the number of trainings, the number of staff trained, and/or the number of fact sheets distributed).

IPM Advocates and local municipal agency staff/consultants provided OWOW services to approximately 288 participating retailers throughout California. Table 3 provides a summary of outreach activities between July 2023 and June 2024. These activities were funded by the stormwater programs of local municipalities.

Table 3. Summary of Outreach Activities

Audience	OWOW Outreach Activity
Retailers	288 retailers participated in the OWOW program
	122 trainings conducted
	780 retail staff trained
Direct to Consumer	211 public outreach events
	84,743 people attended these public outreach events (In person and virtually)

IPM Advocates and local municipal agency staff/consultants conducted 122 trainings and trained 780 retail store staff. The training topics include IPM and strategies for managing pest problems with less-toxic and eco-friendly products. In addition, IPM Advocates provided tips for new gardeners and how to protect gardens in the time of

drought. Education has expanded to include protecting gardens during times of drought since plants are more prone to pest problems when they are (drought) stressed.

In September 2023, The Home Depot Eco Actions Blog featured a [Q&A with a retail associate](#) discussing their experience with the OWOW program. The retail associate highlighted how the OWOW retail training program has equipped them to effectively communicate less-toxic pest control alternatives to consumers.

Retailer e-Newsletter

After receiving training, retail store associates can opt into the OWOW Retailer e-Newsletter. This biannual newsletter is emailed at the beginning of spring and fall and contains information on seasonal pest problems and eco-management solutions. These newsletters help store staff, including managers, stay current on pest problems that might be affecting their customers. Many of the managers print the OWOW newsletter and post it for all staff to review. The newsletter is delivered to 301 retail associates.

Section 5. Program Development

To support a growing demand for OWOW outreach material and IPM Advocates, efforts are underway, as well as future considerations, to advance the OWOW program.

5.1 UPDATES IN PROGRESS

Fact Sheets

In 2024, the *Aphids*, *Mosquitoes*, *Cockroaches*, and *Spiders* fact sheets are undergoing review by subject matter experts and a public communications specialist. Additionally, these fact sheets will be translated into Spanish and made available on the OWOW website. Once these fact sheet updates are complete, 11 of the 18 OWOW fact sheets will have Spanish translations.

Implementation and Guidance Handbook

To bring consistency to the OWOW program's implementation, the *Implementing an IPM Partnership: A How-To Manual* dated March 2000, will be revised to describe current practices and responsibilities for OWOW subscribing agencies, IPM Advocates, and participating retailers. The primary goal of the Implementation and Guidance Handbook is to describe the core elements of local implementation, establish an annual reporting schedule, and provide consistency in retailer trainings, materials, displays, and communication.

5.2 FUTURE CONSIDERATIONS

IPM Advocate Training Program

To operate at a statewide scale, and in a sustainable manner, certain aspects of the existing OWOW program must be formalized and expanded. In 2022, CASQA began developing an outline for an IPM Advocate Training Program. In September 2023, CASQA met with Department of Pesticide Regulation (DPR) representatives to discuss collaboration and funding opportunities for the OWOW program. Development of an IPM Advocate Training Program will require outside funding support and collaboration with partners such as UC-IPM. Once outside funding is identified, CASQA will coordinate workgroups comprised of OWOW Subscribers, current IPM Advocates, and training experts to develop the IPM Advocate Training Program.

Appendix A: Example Outreach Materials



Figure A1. Trackable QR Code Poster in Store Aisle

EFFECTIVE ECO-FRIENDLY PEST CONTROL • LESS-TOXIC PRODUCTS

CONTROLLING ANTS

IN YOUR HOME

ANT CONTROL IS EASY AS 1-2-3!		
1. Seal the source	2. Bait them	3. Monitor
• Store food in sealed containers • Caulk and weatherstrip cracks and gaps	• Use bait stations and sticky traps, which are more effective than sprays • Choose a bait station with borax (tetraborate decahydrate) or hydramethylnon	• After ants are gone, watch for new ant activity • To avoid a new ant invasion, spread desiccating dust in areas where you see ants • Avoid sprays, which only temporarily get rid of ants

Argentine ants are frequent invaders in California homes. Their small size (1/8 inch) allows them to enter the home through cracks and crevices. They typically arrive a few at a time at first (the scouts), and then in long lines, following scent trails to a food source.

A QUICK FIX FOR AN ANT EMERGENCY

1. Find what ants are after (usually food or water) and where they are entering the room (usually through a crack in the wall).

2. Spray lines of ants with soapy water and wipe up. Clean up any food or spills.
3. Block entry points temporarily with a smear of petroleum jelly or a piece of tape.
4. If you can't find an entry point, place a bait station in an out-of-the-way spot on the line the ants have been following. Remember to remove the bait station when the line of ants has disappeared so you don't attract more ants into the house. (See *Tips for Using Ant Baits*.)

TIPS FOR USING ANT BAITS

Bait stations are much safer for humans, pets, and the environment than sprays. Ants carry small quantities of bait back to the nest to share, reducing the local ant population.

- Use baits with active ingredients borax/tetraborate decahydrate. Bait stations with hydramethylnon should be enclosed.
- Argentine ants change their food preferences frequently. If one bait is not working, try another type. Wait at least a day to see if ants take the bait.

- Place bait stations out of reach from children and pets. Do not spray insecticide around the bait; it will repel the ants.
- Baits may take several weeks to kill the ants. At first you may see more ants coming to the bait, but after a few days to a week you should see fewer ants.
- When ants are gone, remove the bait so you don't attract more ants. Return enclosed bait stations to the original box to save and use again. Put the box inside a sealed plastic bag, and store away from children and pets.



Choose eco-friendly products for your home and garden. Look for this symbol before you buy.

Figure A2: Ants Fact Sheet (Front)

Appendix B: 2024 Home Depot Product List

Pesticide Bays	Hot Shot Bed Bug Killer Dust (DE)
Amdro Gopher Traps	Liquid Fence Deer & Rabbit Repellent
BioAdvanced Houseplant Insect & Mite Control	Mighty Mint Rodent Repellent
BioAdvanced Organic Tomato Vegetable & Fruit Insect Control	Monterey Nematode Control
Bird-B-Gone Stainless Steel Bird Spikes	Mosquito Dunks
Black Flag Roach Motel	Natural Enemy Scarecrow Owl
Bonide Cpt Jack's Copper Fungicide	Ortho Bed Bug Trap
Bonide Cpt Jack's Dead Weed Brew	Ortho Ground Clear Weed & Grass Killer (Green Label)
Bonide Cpt Jack's Lawn Weed Brew	Preen Natural Weed Preventer
Bonide Cpt Jack's Neem MAX	Raid Ant Bait III
Bonide Cpt Jack's Neem Oil	Raid Disposable Fly Trap
Bonide Cpt Jack's Orchard Spray	Raid Fly Ribbon
Bonide Cpt Jack's Tomato & Vegetable	Raid Fly Stick
Bonide Cpt Jack's Insecticidal Super Soap	Raid Window Fly Trap
Bonide Mole Max	Rescue Fly Pad
Bonide Repels-All	Rescue Fly Trap Refill
Bonide Rose Rx	Rescue Outdoor Fly Trap
Buggy Beds Mosquito Repellent Bands	Rescue Reusable Fly Trap
Critter Ridder	Rescue W-H-Y Trap
Critter Ridder Granule	Rescue Yellow Jacket Trap
Digger Root Guard Gopher Basket	Rescue Yellow Jacket Trap Cartridge
EcoLogic Bed Bug Killer	Safer Brand Ant & Crawling Insect Killer (DE)
First Saturday Lime	Safer Brand Ant, Roach & Spider Killer
Fly Swatter	Safer Brand Diatomaceous Earth
Garden Safe Fungicide 3 (Neem Oil)	Safer Brand Houseplant Sticky Stakes
Garden Safe Garden Insect Killer	Safer Brand Indoor Fly Trap
Garden Safe Houseplant & Garden Insect Killer	Safer Brand Indoor Fly Trap Refill Pack
Garden Safe Insecticidal Soap	Safer Brand Indoor Pest Control Multi-Insect Killer
Garden Safe Neem Oil Extract	Safer Brand Snake Shield
Garden Safe Rose & Flower Insect Killer	Safer Brand The Pantry Pest Trap
Garden Safe Slug & Snail Bait	Sevin 2-in-1 Disease and Insect Control
Green Gobbler 20% Vinegar Weed Killer	Skunk Scram
Harris Boric Acid Roach Powder	Southern Ag Thuricide BT
Harris Diatomaceous Earth	Spectracide Pruning Seal
Harris Famous Roach Tablets	Star brite Spider Away
Havahart Live Animal Cage Trap	STEM Flying Insect Killer Kills Flies Mosquitoes Gnats
	STEM Crawling Insect Killer Kills Ants Roaches Spiders
	STEM Multi Insect Killer Kills Ants Roaches Flies

Terro Ant Killer II
Terro Fruit Fly Trap
Terro Liquid Ant Bait
Terro Multi-Surface Liquid Ant Baits
Terro Outdoor Liquid Ant Bait Stakes
Terro Spider & Household Insect Trap
Tom Cat Attractant Gel
Tom Cat Kill & Contain Mouse Trap
Tom Cat Press 'N Set Mouse Trap
Tom Cat Rat Trap
Tom Cat Rodent Block Expanding Foam
Tom Cat Rodent Repellent
Tom Cat Secure Kill Rat Trap
Victor Catch & Hold Mouse Trap
Victor Easy Set Mouse Traps
Victor Electronic Mouse Trap
Victor Electronic Rat Trap
Victor Gopher Traps
Victor Power Kill Rat Trap
Victor Rat Trap
Victor Rat-A-Way Rat & Mouse Repellent
Victor Safe Set Rat Trap
Victor Scent Away Natural Rodent Repeller Packs
Zevo Ant, Roach & Fly insect killer
Zevo Ant, Roach & Spider insect killer
Zevo Fly, Gnat, & Fruit Fly
Zevo Flying Insect Trap
Zevo Flying Insect Trap Refill Pack

Fertilizer Bays

Alaska Fish Plant Food 5-1-1
Burpee Enhanced Organic All Purpose Plant Food
Burpee Enhanced Organic Rose & Bloom Plant Food
Burpee Enhanced Organic Tomato & Edibles Plant Food
Burpee Organic Bone Meal
Burpee Organic Blood Meal
Burpee Organic All Purpose
Burpee Organic Tomato & Vegetable
Dr Earth Lawn Food
Dr. Earth Organic Fertilizer
Earthworm Castings
Espoma Organic Blood Meal

Espoma Organic Bone Meal
Espoma Organic Fertilizer
Espoma Organic Lime
Espoma Organic Soil Acidifier
Kellogg Organic Plus Fertilizer
Mater Magic
Miracle-Gro Fertilizer Spikes Tree & Shrub
Monterey Fish & Guano Fertilizer
Osmocote
Pennington Epsom Salts
Superthrive
Vigoro Fruit, Nut & Citrus Fertilizer Spikes
Vigoro Organic Plant Food All Purpose
Vigoro Organic Plant Food Blood Meal
Vigoro Organic Plant Food Bone Meal
Vigoro Organic Plant Food Rose & Flower
Vigoro Organic Plant Food Tomato & Vegetable
Vigoro Tree & Shrub Fertilizer Spikes

Appendix C: 2024 Ace Hardware Product List

Alaska Fish Fertilizer	Dr. Earth Final Stop Disease Control Fungicide
Amdro Kills Ants Ant Killer	Dr. Earth Final Stop Fruit Tree Insect Killer
Answer Kills Roaches Powder	Dr. Earth Final Stop Rose & Flower Insect Killer
Bed Bug Traps	Dr. Earth Final Stop Vegetable Insect Killer
BioCare Codling Moth Traps	Dr. Earth Final Stop Yard & Garden Insect Killer
Bird Repellent Gel	Dr. Earth Organic Fertilizer
Bird Scare Tape	Drop in the Bucket Mouse Trap
Bird-B-Gone Flash Tape	E.B. Stone Organic Fertilizer
Bird-B-Gone Steel Bird Spikes	Earth's Ally Disease Control
Black Flag Roach Motel	Earth's Ally Insect Control
Black Flag Window Fly Traps	Earth's Ally Weed & Grass Killer
Bonide All Seasons's Spray Oil	Earth's Ally Weed Killer
Bonide Burnout	EcoSmart 3 in 1 Rose & Flower
Bonide Captain Jack's Dead Bug Brew	EcoSmart Ant & Roach Killer
Bonide Chipmunk, Squirrel, & Rodent Repellent	EcoSmart Flying Insect Killer
Bonide Copper Fungicide	EcoSmart Garden Insect Killer
Bonide Go Away! Rabbit, Dog, & Cat Repellent	EcoSmart Home Pest Control
Bonide Hot Pepper Wax Animal Repellent	EcoSmart Insect Killer
Bonide Insecticidal Soap	EcoSmart Insect Killing Granules
Bonide Mole Max	EcoSmart Mosquito Fogger
Bonide Mosquito Beater	EcoSmart Wasp & Hornet Killer
Bonide Mouse Magic	EcoSmart Weed & Grass Killer
Bonide Neem Oil	Epsom Salts
Bonide Rat Magic	Espoma Garden Lime
Bonide Repels All	Espoma Organic Fertilizer
Bonide Snake Stopper	Espoma Organic Insect Soap
Bonide Sulfur Fungicide	Espoma Soil Acidifier
Bonide Tomato & Vegetable	Fly Paper
Bonide Wilt Stop	Fly Ribbon
Buggy Beds	Fly Stick
Cloud Cover	Fly Swatter
Combat Ant Killing Bait	Fly Trap
Combat Roach Killing Bait	Fresh Cab Rodent Repellent
Critter Ridder Sprinkler	Fruit Fly Trap
De Fence Deer & Rabbit Repellent	Giant Destroyer Garlic Repellent Clips Deer & Rabbit
Deer Off Deer Repellent	Good Nature CO2 Rodent Trap
Diatomaceous Earth	Gopher Baskets
	Gopher Hawk
	Gopher Scram
	Gopher Traps
	Harris 20% Vinegar Weed Killer
	Harris Bed Bug Killer Diatomaceous Earth
	Harris Boric Acid Roach Powder
	Harris Diatomaceous Earth
	Harris Famous Roach Tablets

Harris Neem Oil
Harris Roach Traps
Havahart Live Animal Cage Trap
Insect Sticky Traps
Jobe's Fertilizer Spikes
Jobe's Organic Fertilizer
Jobe's Organic Fertilizer Spikes
JT Eaton Kills Bed Bugs Powder
Liquid Fence Animal Repellent
Liquid Fence Deer & Rabbit
Liquid Fence Snake Repellent
Live Catch Mouse Trap
Messina's Animal Stopper
Messina's Deer Stopper
Messina's Rodent Stopper
Messina's Squirrel Stopper
Miracle Gro Performance Organics
Mole Trap
Mole X
Monterey 70% Neem Oil
Monterey Bt
Monterey Fish & Guano
Monterey Fruit Tree Spray Plus
Monterey Garden Insect Spray
Monterey Horticultural Oil
Monterey Liqui-Cop
Monterey Neem Oil
Monterey Take Down Garden Spray
Mosquito Bits
Mosquito Dunks
Moss Out! Roofs & Walks
Mouse Traps
Mouse X
Mouse Zero
Natria Grass & Weed Control
Natria Insect, Disease, & Mite Control
Natria Insecticidal Soap
Natria Neem Oil
Natria Rose & Flower
Natria Snail & Slug Killer Bait
Nature's Care Organic Fertilizer
Neem Oil
Orange Guard
Organocide Bee Safe 3 in 1 Garden Spray
Ortho 3 in 1 Insect, Mite, & Disease
Ortho Bed Bug Traps
Ortho Deer B Gon
Ortho GroundClear Weed & Grass
Ortho Home Defense Ant & Roach Killer w/ Essential Oils

Ortho Home Defense Crawling Bug Killer w/ Essential Oils
Ortho Home Defense Flying Bug Killer w/ Essential Oils
Ortho Insect Killer Tree & Shrub
Osmocote
Owl Garden Defense
Pulverize Weed & Grass Killer
Pulverize Weed Killer for Lawns
Pulverize Weed, Brush & Vine Killer
Raid Ant Baits III
Raid Essentials Ant & Roach
Raid Essentials Ant, Spider, & Roach
Raid Small Roach Baits
Rat Traps
Rat X
Rat Zero
Rescue Ant Baits
Rescue Fly Trap
Rescue Fly Trap Refill
Rescue Fly TrapStik
Rescue Pantry & Birdseed Moth Traps
Rescue WHY Trap
Rescue WHY Trap Refills
Rescue Yellowjacket Trap
Rescue Yellowjacket Trap Cartridge
Rescue Yellowjacket Trap Refill
Safer 3 in 1
Safer Ant & Crawling Insect Killer
Safer Caterpillar Killer
Safer Critter Ridder Animal Repellent
Safer Critter Ridder Deer & Rabbit
Safer Diatomaceous Earth
Safer End ALL
Safer Garden Dust
Safer Garden Fungicide
Safer Houseplant Sticky Stakes
Safer Insect Killing Soap
Safer Moss & Algae Killer
Safer Neem Oil
Safer Pantry Pest Trap
Safer Rose & Flower
Safer Snake Shield
Safer Tomato & Vegetable
Safer Yellowjacket & Wasp Attractant
Safer Yellowjacket & Wasp Trap
Scarecrow
Scott's Continuous Release Fertilizer
Scotts Moss EX
Scram for Cats
Sevin Sulfur Dust

Shake Away Rodent Repellent
Slug Trap
Sluggo
Sluggo Plus
Soil Moist
St. Gabriel Moss Killer
Stay Away Ants
Stay Away Mice
Stay Away Moths
Stay Away Spider
Tanglefoot
Terro Ant Killer Liquid
Terro Clothes Moth Alert
Terro Flea Trap
Terro Fly Magnet
Terro Fruit Fly Trap
Terro Indoor Fly Trap
Terro Liquid Ant Bait
Terro Moth Traps
Terro Multi-Purpose Insect Bait
Terro Multi-Surface Liquid Ant Bait
Terro Outdoor Liquid Ant Bait
Terro Roach Magnet
Terro Wasp & Fly Trap

Tom Cat Animal Repellent
Tom Cat Attractant Gel
Tom Cat Deer Repellent
Tom Cat Mouse Traps
Tom Cat Rat Traps
Tom Cat Rodent Repellent
Victor Black Box Gopher Trap
Victor Electronic Mouse Trap
Victor Electronic Rat Trap
Victor Fly Magnet
Victor Mole & Gopher Repellent
Victor Mole Trap
Victor Mouse Traps
Victor Mouse-A-Way Mouse Repellent
Victor Natural Rodent Repeller Packs
Victor Rat Traps
Victor Rat Zapper
Victor Rat-A-Way Rat & Mouse Repellent
Victor Tin Cat Mouse Trap
Whitney Farms Lawn Weed Killer
Whitney Farms Organic Fertilizer
Whitney Farms Weed & Grass Control
Window Fly Trap
Yard Enforcer Sprinkler

Appendix D: CASQA Partnership Letter to The Home Depot



California Stormwater Quality Association¹

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

February 16, 2024

Ron Jarvis, Chief Sustainability Officer
The Home Depot
2455 Paces Ferry Road
Atlanta, GA 30339

Our Water, Our World Partnership

Dear Mr. Ron Jarvis:

On behalf of the California Stormwater Quality Association,¹ thank you for The Home Depot's continued partnership with the Our Water, Our World (OWOW) program. Since 2003, The Home Depot has been an important partner in our goal to promote less-toxic, eco-friendly pest management solutions. This collaboration has been essential in advancing a statewide Integrated Pest Management (IPM) outreach program that provides consumers with point-of-purchase information on eco-friendly products and IPM practices.

2023 HIGHLIGHTS

Last year, The Home Depot's participation expanded to 75 stores across California, up from 67 in 2022. A highlight of our partnership includes:

- **Retail Associate Training:** IPM Advocates conducted training sessions in 42 stores, educating a total of 281 The Home Depot associates. These sessions are important for empowering your staff with the knowledge to recommend less-toxic pest control solutions.
- **Public Outreach Events:** IPM Advocates successfully hosted 33 storefront outreach events, engaging with 854 customers. These events serve as a platform for raising awareness and educating the public on eco-friendly products available at your stores.

ACKNOWLEDGMENT OF SUPPORT

Since 2009, The Home Depot has provided an introduction letter for local stores and it has been an important tool for maintaining ongoing partnerships with existing stores and establishing new partnerships with additional stores. This support has not only facilitated our program's growth but also underscored The Home Depot's commitment to sustainable practices and community education. The Home Depot's willingness to stock less-toxic pest products, accommodate educational shelf tags and materials in stores, and make staff available for training demonstrates a strong partnership with the OWOW program.

¹ CASQA is a nonprofit corporation that advances sustainable stormwater management protective of California water resources. With well over 2,000 members, our membership is comprised of a diverse range of stormwater quality management organizations and individuals, including cities, counties, special districts, federal agencies, state agencies, ports, universities and school districts, wastewater agencies, water suppliers, industries, and consulting firms throughout the state. Collectively, CASQA represents over 36 million people in California.

The Home Depot - Our Water, Our World Partnership

LOOKING FORWARD

Encouraged by our progress in 2023, we anticipate further expanding our reach throughout California. Ongoing efforts to enhance the OWOW program include:

- Updating our educational materials with current IPM best practices.
- Translating our educational materials to Spanish in our commitment to inclusive outreach.
- Maintaining our public-facing educational [website](#).
- Developing a training program to ensure trained professionals are available to support our retail partners.

You can find more information on the OWOW program's activities in our [2023 Annual Report](#).

Thank you once again for your support and partnership.

If you have any questions, please contact CASQA Program Manager Joseph Draper at joseph.draper@casqa.org.

Sincerely,



Karen Cowan, Executive Director
California Stormwater Quality Association

Appendix E: The Home Depot Support Letter



Interoffice MEMORANDUM

DATE: March 25, 2024
TO: California Store Managers, D28 ASMs and Department Heads
FROM: Candace Rodriguez
CC: Steve Knott, Scott Jacobson
SUBJECT: Our Water Our World Training

OUR WATER, OUR WORLD is a coalition of organizations whose purpose is to encourage consumers to use less toxic pest controls in and around their homes. They specialize in retail friendly education. Their goal is not to alienate consumers by telling them what they can't use, but instead their information focuses on environmentally-preferred pest management and ties into products currently on our shelves.

An Our Water, Our World (OWOW) representative will be in your store to help train employees and label less-toxic products with shelf-talkers. The representative may also schedule a tabling event to educate consumers. This ties in well with "How-to" weekend events. The representative will display a sampling of excellent environmentally-preferred and Eco Actions products off our shelves. They will provide free informational literature and a wealth of knowledge and experience. Please enjoy this additional help in your store.

An OWOW representative will contact you before the training or demonstration date to arrange details. Please contact Joseph Draper of the California Stormwater Quality Association at (559) 492-07507 if you have questions.

Thank you,

Candace W. Rodriguez

from the desk of.....
Candace Rodriguez
Senior Director – Sustainability
THE HOME DEPOT USA, INC.
2455 Paces Ferry Road
Atlanta, GA 30339
(770) 384-3544

INTERNAL USE



California Stormwater Quality Association®

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

2024 Pesticide Annual Report and Effectiveness Assessment

Prepared by the California Stormwater Quality Association

August 2024

Preface

ADVANCING SUSTAINABLE STORMWATER MANAGEMENT

The California Stormwater Quality Association (CASQA) is a nonprofit corporation that advances sustainable stormwater management protective of California water resources. With well over 2,000 members, CASQA's membership is comprised of diverse range of stormwater quality management organizations and individuals, including cities, counties, special districts, federal agencies, state agencies, ports, universities and school districts, wastewater agencies, water suppliers, industries, and consulting firms throughout the state. Collectively, CASQA represents over 34 million people in California.

CASQA's [*Vision for Sustainable Stormwater Management*](#)¹ (Vision) defines the actions needed to manage stormwater as an essential component of the state's water resources, support human and ecological needs, protect water quality, and enhance and restore California's waterways. There are four guiding principles to achieve this Vision. Like the legs of a chair, each Principle is essential and all four must be in place to support the whole.

Principle #1: Program Implementation: Projects and programs that use stormwater as a resource, protect water quality and beneficial uses, and efficiently minimize pollution are critical for sustainable stormwater management. Stormwater capture and true source control (identifying and mitigating a pollutant at its source) are the primary drivers of these solutions, with effective BMPs providing an important supportive role.

Principle #2: Permits, Regulations, and Legislation: Permits, regulations, and legislation need to focus on effectiveness and desired outcomes to support sustainable stormwater management. Regulatory and legislative actions must align with and support the other components of the Vision – advancing stormwater capture, true source control, effective BMPs, increasing public education and awareness focused on stormwater as a resource, and securing funding to support these solutions.

Principle #3: Public Education: Public awareness, understanding, and support is essential to sustainable stormwater management. The key shift is viewing stormwater as a resource that must be protected and integrated into overall water resource management.

Principle #4: Funding: Significant financial investment is required to achieve sustainable stormwater management. Stormwater is the most underfunded portion of the water sector and substantial funding is needed to bring these solutions forward.

2024 PESTICIDE ANNUAL REPORT AND EFFECTIVENESS ASSESSMENT

This report, *2024 Pesticide Annual Report and Effectiveness Assessment*, advances Principle #1 by addressing pesticide pollution through source control solutions. CASQA has identified Current Use Pesticides as a [*Water Quality Priority*](#), requiring solutions at a statewide scale. To advance true source control for pesticides, CASQA is actively engaged with state and federal regulators in an effort to develop an effective pesticide regulatory system, based primarily on existing statutes, that includes timely identification and mitigation of urban water quality impacts, and proactively prevents additional problems through the registration and registration review processes. This report describes CASQA's regulatory engagement activities from July 2023 through June 2024.

¹ <https://www.casqa.org/wp-content/uploads/2022/10/final - vision for sustainable stormwater management - 10-07-2020.pdf>

Acknowledgements

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Funding to support this work was provided from Alameda Countywide Clean Water Program, Contra Costa Clean Water Program, Fairfield-Suisun Urban Runoff Management Program, Marin Countywide Stormwater Pollution Prevention Program, Napa Countywide Stormwater Pollution Prevention Program, Sacramento Stormwater Quality Partnership, San Mateo Countywide Water Pollution Prevention Program, Santa Clara Valley Urban Runoff Pollution Prevention Program, Sonoma County Water Agency, and the Solano Stormwater Alliance.

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Abbreviations used in this Report

AB – Assembly Bill

BACWA – Bay Area Clean Water Agencies

CASQA – California Stormwater Quality Association

CWA – Clean Water Act

DPR – California Department of Pesticide Regulation

EAD – Exposure Assessment Document (DPR)

EPA – United States Environmental Protection Agency

ERA – Ecological Risk Assessment

ESA – Endangered Species Act

ID – Interim Decision (EPA)

IPM – Integrated Pest Management

MAA – Management Agency Agreement between DPR and the Water Boards

MS4 – Municipal Separate Storm Sewer System

NACWA – National Association of Clean Water Agencies

NPDES – National Pollutant Discharge Elimination System

OPP – U.S. EPA Office of Pesticide Programs

OW – U.S. EPA Office of Water

OWOW – CASQA's Our Water, Our World Program

PAH – Polycyclic aromatic hydrocarbon

PEAIP – Program Effectiveness Assessment and Improvement Plan

PID – Proposed Interim Decision (EPA)

PMAC – Pest Management Advisory Committee (DPR)

PPDC – EPA's Pesticide Program Dialogue Committee

RA – Risk Assessment

RCD – Risk Characterization Document (DPR)

RMD – Risk Management Directive (DPR)

SFBRWQCB – San Francisco Bay Regional Water Quality Control Board

SFEI – San Francisco Estuary Institute

SPM – Sustainable Pest Management Work Group (DPR)

STORMS – Strategy to Optimize Resource Management of Storm Water (a program of the State Water Board)

SWAMP – California Water Boards Surface Water Ambient Monitoring Program

TMDL – Total Maximum Daily Load (regulatory plan for solving a water pollution problem)

TSC – CASQA True Source Control Subcommittee

UP3 – Urban Pesticides Pollution Prevention Partnership

UPP – Urban Pesticide Provisions

USDA – United States Department of Agriculture

USGS – United States Geological Survey

Water Boards – California State Water Resources Control Board together with the California Regional Water Quality Control Boards

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Executive Summary

To address the problems caused by pesticides in California's urban waterways, CASQA collaborates with the California State Water Resources Control Board and the California Regional Water Quality Control Boards (Water Boards). By working with the Water Boards and other water quality organizations, CASQA addresses the impacts of pesticides efficiently and proactively through the statutory authority of the California Department of Pesticide Regulation (DPR) and EPA's Office of Pesticide Programs (OPP). This collaboration, initiated more than 20 years ago, has resulted in significant changes in pesticide regulation. A summary of CASQA's activities to address key management questions are described below, with more details and outcomes provided in Section 2.

Near term / Current problems – Are actions being taken by State and Federal pesticides regulators and stakeholders that are expected to end pesticide-caused toxicity or exceedances of pesticide water quality objectives in surface waters receiving urban runoff?

- 💧 CASQA shared its urban runoff expertise with pesticide regulators by preparing comment letters to EPA regarding chlorothalonil, 3-Iodo-2-propynyl butylcarbamate (IPBC), oxyfluorfen, and pesticide labeling. (See Table 3)
- 💧 In response to CASQA requests to mitigate the impacts of etofenprox use on urban impervious surfaces, EPA continued to incorporate label language restricting specific uses, including using CASQA's suggested pictogram and proposed labeling. (See Table 3 and Appendix)
- 💧 In response to CASQA requests to mitigate environmental risks in urban environments, EPA initiated significant mitigation measures for urban uses of ziram, including removing it as a material preservative in paint and reducing the maximum concentration in building materials. (See Table 3 and Appendix)
- 💧 In response to CASQA requests to mitigate environmental risks, EPA canceled registration of residential uses of oxyfluorfen, including all residential turf and ornamental products. (See Table 3 and Appendix)
- 💧 CASQA updated the Pesticide Watch List following the review of multiple recent surface water monitoring programs. The Watch List is shared with regulators and scientists to stimulate generation of surface water monitoring and aquatic toxicity data for the highest priority pesticides. (See Table 2.)

Long term / Prevent future problems – Do pesticides regulators have an effective system in place to exercise their regulatory authorities to prevent pesticide toxicity in urban water bodies?

- 💧 DPR continues to demonstrate its commitment to addressing pesticide impacts on receiving waters through the creation of a Sustainable Pest Management (SPM) Roadmap that seeks to transition the state away from high-risk pesticides² to sustainable pest control practices.
- 💧 In 2014 the State Water Board established an urban pesticides reduction project (now titled the Statewide Urban Pesticides Provisions or UPP) as a top priority project under the comprehensive stormwater strategy, known as "Strategy to Optimize Resource Management of Storm Water" or STORMS.³ The desired outcome for these provisions is to institutionalize the State's strategy of utilizing pesticide regulations as the most effective approach for preventing and addressing pesticide water quality problems. CASQA remains dedicated to supporting State Water Board staff.
- 💧 Although many improvements have been made by EPA OPP since the early 2000s, improvement in scientific evaluations supporting EPA OPP's regulatory efforts and better understanding of urban runoff

² The SPM Roadmap defines high-risk pesticides as "active ingredients that are highly hazardous and/or formulations or uses that pose a likelihood of, or are known to cause, significant or widespread human and/or ecological impacts from their use."

https://www.cdpr.ca.gov/docs/sustainable_pest_management_roadmap/spm_roadmap.pdf

³ http://www.waterboards.ca.gov/water_issues/programs/stormwater/storms/

management systems are still necessary to adequately protect urban surface waters from pesticide impairments.

- Victoria Kalkirtz, co-chair of CASQA's True Source Control (TSC) Subcommittee, continued to be a member of DPR's Pest Management Advisory Committee (PMAC).

In the coming year, CASQA plans to address near-term pesticide concerns and seek long-term regulatory change. Near-term and long-term tasks are identified in Section 3, Tables 5 and 6. Key topics include:

- Continued engagement with EPA regarding incorporating their Endangered Species Act (ESA) obligation in registrations and re-registrations, including recommending the use of pictograms in labels, and seeking opportunities in California for EPA's regional and vulnerable species pilot programs;
- Continued engagement with DPR regarding the SPM Roadmap specific to urban implementation programs and opportunities;
- Continued support of the UPPs by the State Water Board;
- Continued development of a coordinated monitoring program in partnership with the Water Boards, DPR, and EPA Region 9;
- Registration review-related activities at EPA for pyrethroids and fipronil;
- Initiating discussion of urban water quality concerns at the EPA Pesticide Program Dialogue Committee's (PPDC) future meetings;
- Continued review of DPR registration applications and proposed decisions for new products.

Section 1. Introduction

1.1 IMPORTANCE OF CASQA'S EFFORTS TO IMPROVE PESTICIDE REGULATION

For decades, the uses of certain pesticides in urban areas – even when applied in compliance with pesticide regulations – have adversely impacted urban water bodies. Currently used pesticides are the primary cause of toxicity in California surface waters, including urban water bodies.⁴ Under the Clean Water Act (CWA), municipalities are held responsible for the quality of urban runoff discharges conveyed to receiving waters through municipal storm drainage systems. When pesticide-related water pollution occurs, local agencies may be held responsible for exceedances of standards in receiving waters, as well as costly monitoring and mitigation efforts. To date, some California municipalities⁵ have incurred substantial costs to comply with pesticides-related Total Maximum Daily Loads (TMDLs) and additional permit requirements. In some cases (e.g., diazinon, chlorpyrifos), municipal compliance costs have continued for over a decade after virtually all urban use was terminated. Throughout California, more municipalities will be subject to similar requirements, as additional TMDLs and Basin Plan Amendments are adopted (Table 1). Meanwhile, local agencies have no authority to further control urban pesticide uses⁶ in order to proactively prevent pesticide pollution and avoid these costs and liabilities.

Under federal and state statutes, EPA and DPR have the authority and responsibility to regulate pesticides and protect water bodies from adverse effects (including impacts from pesticides in urban runoff). For many years, neither agency recognized the need, nor possessed the institutional capacity, to exercise their authority to protect urban water quality. As a result, past registration actions allowed a number of pesticides (such as pyrethroids and fipronil) to be used legally in ways that resulted in widespread pollution in urban water bodies. This situation is depicted in Figure 1.

To change this situation, CASQA actively engages with state and federal regulators in an effort to develop an effective pesticide regulatory system, based primarily on existing statutes, that includes timely identification and mitigation of urban water quality impacts, and proactively prevents additional problems through the registration and registration review processes (Figure 2).

⁴ See reports from the California Surface Water Ambient Monitoring Program Sediment Pollution Trends Program including Anderson, B.S., Hunt, J.W., Markewicz, D., Larsen, K., 2011. Toxicity in California Waters, Surface Water Ambient Monitoring Program. California Water Resources Control Board. Sacramento, CA.

⁵ For example, Sacramento-area municipalities spent more than \$75,000 in the 2008-2013 permit term on pyrethroid pesticide monitoring alone; Riverside-area municipalities spent \$617,000 from 2007 to 2013 on pyrethroid pesticide chemical and toxicity monitoring.

⁶ Local agencies in California have authority over their own use of pesticides but are pre-empted by state law from regulating pesticide use by consumers and businesses.

Table 1. California TMDLs, Statewide Water Quality Control Plans, and Basin Plan Amendments Addressing Currently Registered Pesticides and/or Toxicity in Urban Watersheds^{7, 8, 9}

Water Board Region	Water Body	Pesticide	Status
Statewide	All MS4s/All Urban Waterways: Statewide Water Quality Control Plan amendments for urban pesticides reduction ["Urban Pesticides Amendments"] (Inland Surface Waters, Enclosed Bays & Estuaries, and Ocean)	All Pesticides/All pesticide-related toxicity	In preparation
	Sediment Quality Objectives (Enclosed Bays & Estuaries)	Sediment Toxicity ¹⁰	Approved
	Toxicity Provisions (Inland Surface Waters and Enclosed Bays & Estuaries)	Toxicity ⁸	Approved May 2023 ¹¹
San Francisco Bay (Region 2)	All Bay Area Urban Creeks	All Pesticide-Related Toxicity	Approved
Central Coast (Region 3)	Santa Maria River Watershed Lower Salinas River Watershed	Pyrethroids, Toxicity Pyrethroids, Toxicity Malathion, Chlorpyrifos, Diazinon ¹⁰	Approved Approved Adopted by Central Coast Water Board, June 2022 ¹³
	San Lorenzo River Watershed (Santa Cruz)	Chlorpyrifos ¹²	Approved
Los Angeles (Region 4)	Marina del Rey Harbor	Copper (Marine antifouling paint) ¹⁴	Approved
	Oxnard Drain 3 (Ventura County)	Bifenthrin, Toxicity	EPA-Adopted Technical TMDL
	Calleguas Creek, its Tributaries and Mugu Lagoon	Water & Sediment Toxicity ⁸ Diazinon & Chlorpyrifos ¹⁰	Approved
	McGrath Lake (Ventura County)	Sediment Toxicity ⁸	Approved

⁷ Excludes pesticides that are not currently registered in California, such as organochlorine pesticides.

⁸ https://www.waterboards.ca.gov/water_issues/programs/tmdl/

⁹ https://www.waterboards.ca.gov/water_issues/programs/tmdl/2020_2022state_ir_reports_final/apx_d_adopted_tmdls_list.pdf

¹⁰ These TMDLs/Plan provisions can trigger toxicity testing stressor source identification studies, and additional follow up, even when toxicity is linked to current pesticides.

¹¹ https://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/tx_ass_cntrl.html

¹² Use prohibited in urban areas (diazinon) or no meaningful use due to use limitations (chlorpyrifos).

¹³ https://www.waterboards.ca.gov/centralcoast/water_issues/programs/tmdl/docs/salinas/oppesticides/

¹⁴ Primarily addresses pesticides that are directly discharged and should not ordinarily appear in stormwater (marine antifouling paint).

Water Board Region	Water Body	Pesticide	Status
	Colorado Lagoon (Long Beach)	Sediment Toxicity ⁸	Approved
	Dominguez Channel; Greater Los Angeles & Long Beach Harbor	Sediment Toxicity ⁸	Approved
	Ballona Creek Estuary	Sediment Toxicity ⁸	Approved
Central Valley (Region 5)	Sacramento River and San Joaquin River Basins	Pyrethroids	Approved
	Sacramento-San Joaquin River Delta Waterways	Diazinon & Chlorpyrifos ¹⁰	Approved
	Sacramento & Feather Rivers	Diazinon & Chlorpyrifos ¹⁰	Approved
	Sacramento County Urban Creeks	Diazinon & Chlorpyrifos ¹⁰	Approved
	Lower San Joaquin River	Diazinon & Chlorpyrifos ¹⁰	Approved
Lahontan (Region 6)	Pesticide Discharge Prohibition	All Pesticides	Approved
Santa Ana (Region 8)	Newport Bay	Copper (Marine antifouling paint) ¹²	Adopted by Santa Ana Water Board ¹⁵
	San Diego Creek, and Upper and Lower Newport Bay	Toxicity (Diazinon & Chlorpyrifos) ¹⁰	EPA-Adopted Technical TMDL
San Diego (Region 9)	Shelter Island Yacht Basin (San Diego Bay)	Copper (Marine antifouling paint) ¹²	Approved
	Chollas Creek	Diazinon ¹⁰	Approved

¹⁵ https://www.waterboards.ca.gov/santaana/water_issues/programs/tmdl/tmdl_metals.html

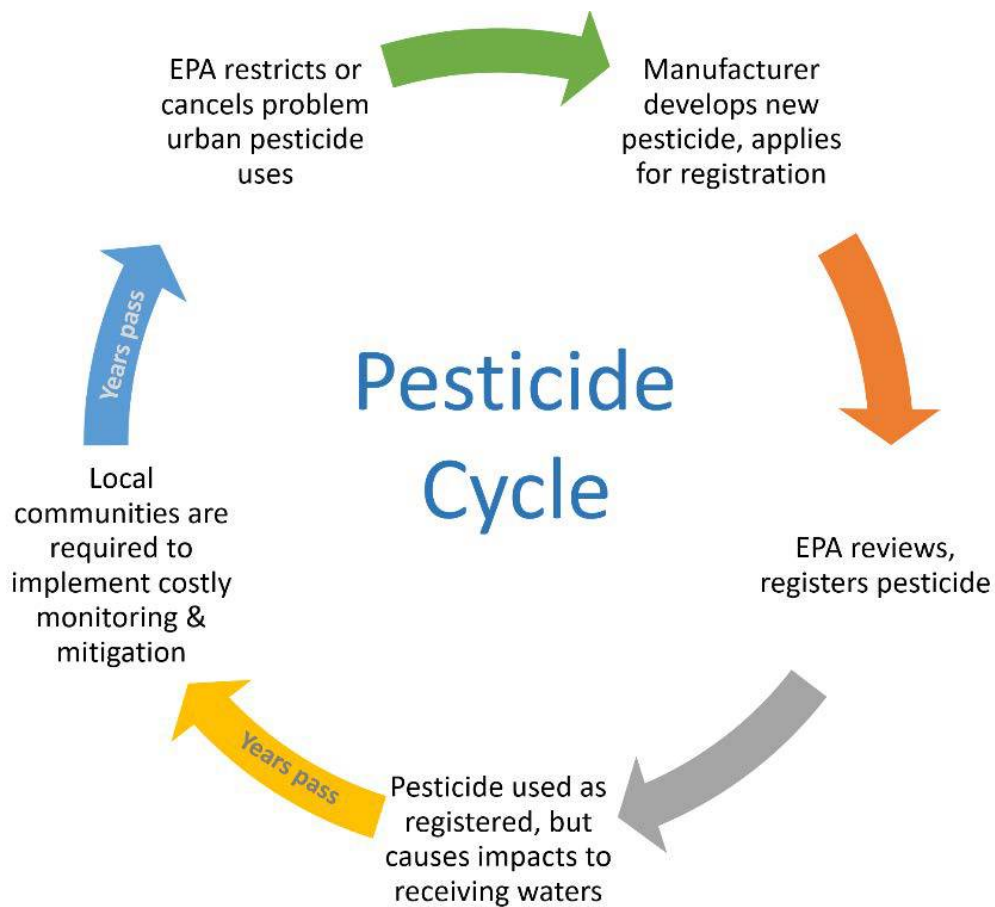


Figure 1. The Pesticide Regulatory System Can Lead to Harmful Outcomes to Surface Waters.

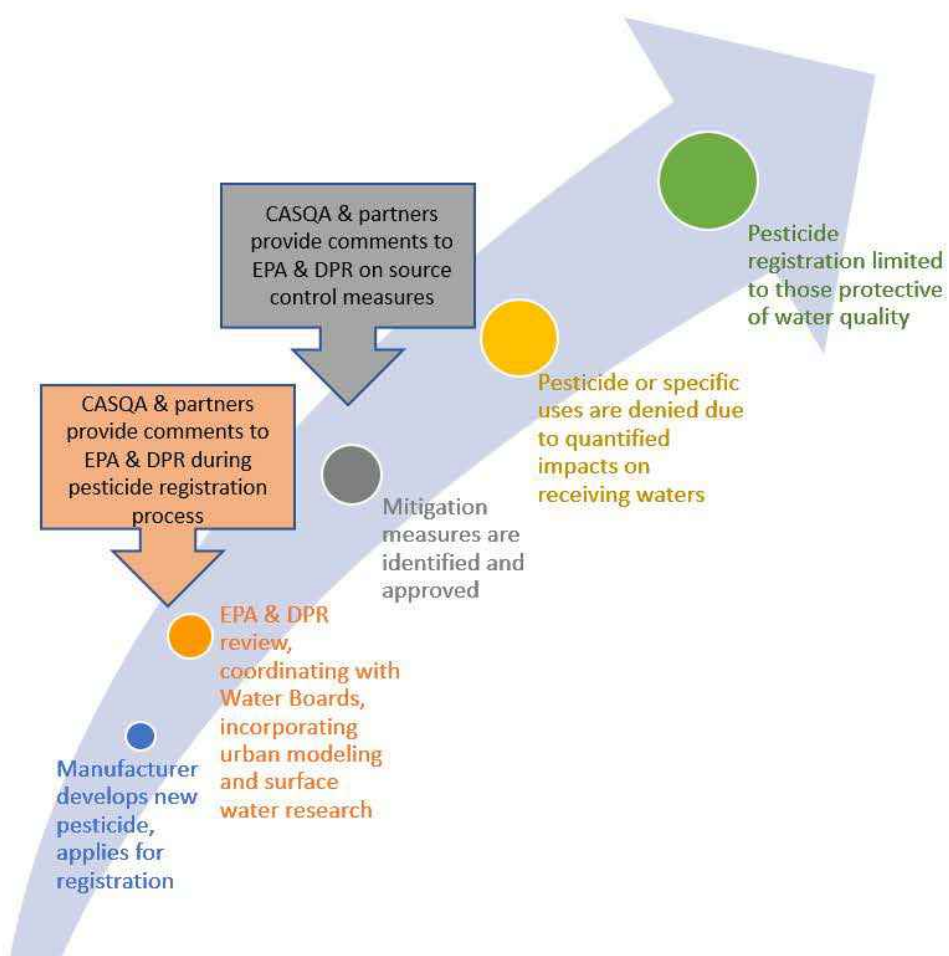


Figure 2. Via Proactive Use of the Pesticide Regulatory Structure, CASQA and Partners Seek to Restrict Pesticide Uses that have the Potential to Cause Urban Water Quality Problems.

1.2 CASQA'S GOALS AND APPLICATION TO PROGRAM EFFECTIVENESS ASSESSMENT

In October 2020, CASQA established the *Vision for Sustainable Stormwater Management*.¹⁶ Within CASQA's Vision, Action 1.2 is to "Minimize Pollution Through True Source Control." Among the objectives described within Action 1.2, Objective 2 has the following scope:

Objective 2: Implement an Urban Pesticide Program

For decades now, the uses of certain pesticides in urban areas – even when applied in compliance with pesticide regulations – have adversely impacted urban water bodies. Currently used pesticides are the primary cause of toxicity in California surface waters, including urban water bodies. CASQA is actively engaged with state and federal regulators in an effort to develop an effective pesticide regulatory system, based primarily on existing statutes, that includes timely identification and mitigation of urban water quality impacts, and proactively prevents additional problems through the registration and registration review processes.

Potential Collaborators: State Water Board, DTSC, EPA, DPR

The effectiveness of CASQA's efforts toward this scope can be expressed in relation to management questions established as part of Municipal Separate Storm Sewer Systems' (MS4s') program effectiveness assessments that are required in some MS4 permits. With respect to addressing urban pesticide impacts on water quality, the following two management questions are suggested for inclusion in MS4s' program effectiveness assessment:

Question 1: (Near term / Current problems) – Are actions being taken by State and Federal pesticide regulators and stakeholders that are expected to end recently observed pesticide-caused toxicity or exceedances of pesticide water quality objectives in surface waters receiving urban runoff?

Question 2: (Long term / Prevent future problems) – Do pesticides regulators have an effective system in place to exercise their regulatory authorities to prevent pesticide toxicity in urban water bodies?

This report is organized to answer these management questions and is intended to support annual permit compliance requirements for both Phase I and Phase II MS4s. It describes the year's status and progress, provides detail on stakeholder actions (by CASQA and others); and provides a roadmap / timeline showing the context of prior actions as well as anticipated end goal of these activities. This report may also be used as an element of future effectiveness assessment annual reporting.

¹⁶ https://www.casqa.org/wp-content/uploads/2022/10/final_-_vision_for_sustainable_stormwater_management_-_10-07-2020.pdf

Section 2. Latest Results of CASQA Efforts

At any given time, there are dozens of pesticides with current or pending actions from the EPA or DPR. Addressing near term regulatory concerns is important because some pesticides may pose immediate threat to water quality that can lead to compliance liability for MS4s, and because some of the regulatory decisions made by EPA and DPR will last many years. For example, pesticide registration decisions are intended to be revisited on a fifteen-year cycle. To inform its engagement on near-term regulatory concerns, CASQA uses the Pesticide Watch List in the prioritization of near-term efforts (Section 2.1).

Meanwhile, CASQA and the Bay Area Clean Water Agencies (BACWA) continue to work on parallel efforts to effect long-term systemic changes in the regulatory process itself (see inset). By identifying inadequacies and inefficiencies in the pesticide regulatory process, and persistently working with EPA and DPR to improve the overall system of regulating pesticides, CASQA and BACWA are gradually achieving results (Section 2.2).

CASQA and BACWA Continue to Coordinate the Monitoring of EPA and DPR Pesticide Regulatory Actions



There has been a long history of collaboration between CASQA, BACWA, and the State Water Board, as all entities seek to track and respond to pesticide regulatory actions, with the goal of avoiding pesticide-related toxicity.

CASQA and BACWA regularly track pesticide regulatory activities by EPA, DPR and other agencies. In 2021, CASQA and BACWA combined resources to track stormwater and wastewater priorities into a single Action Plan, updated monthly.

Together, CASQA and BACWA accomplish tasks that are impractical for individual member agencies. Both CASQA and BACWA are committed to continued collaborations to streamline our proactive regulatory approach.

2.1 NEAR-TERM REGULATORY CONCERNS

CASQA seeks to ensure that the Water Boards and EPA's Office of Water (OW) work with DPR and EPA's OPP to manage problem pesticides that are creating near-term water quality impairments. These efforts address CASQA Vision Action 1.2 as well as Phase II MS4 Program Effectiveness Assessment and Improvement Plan (PEAIP) Management Question 1 regarding observed pesticide-caused toxicity or exceedances of pesticide water quality objectives in surface waters receiving urban runoff.

Assessment Question 1: (Near term / Current problems) – Are actions being taken by State and Federal pesticide regulators and stakeholders that are expected to end recently observed pesticide-caused toxicity or exceedances of pesticide water quality objectives in surface waters receiving urban runoff?

Answer: As detailed below, at the State level, significant progress has been made by DPR in addressing near-term and current problems with pesticides in surface waters receiving urban runoff. DPR continues to implement improved registration processes and responses to observed water quality problems. DPR also continues to implement and evaluate mitigation measures for observed problems with pyrethroids and fipronil.

At the Federal level, less progress has been made in addressing near term problems. Some early actions were taken to address pyrethroid and fipronil problems at the urging of CASQA and DPR. However, EPA analyses do not show a clear understanding of key urban uses, and it is still unclear if upcoming risk management decisions for

pyrethroids, fipronil, and imidacloprid and other neonicotinoids will provide any additional protection of urban water bodies.

2.1.1 Updated Pesticide Watch List

A key tool for identifying near-term regulatory concerns is CASQA's Pesticide Watch List. CASQA reviews scientific literature, government reports, and monitoring studies as they are published. This information is used to prioritize pesticides based on the most up-to-date understanding of urban uses, pesticide characteristics, monitoring, and surface water quality toxicity (for pesticides and their degradates). CASQA uses these insights to update the list each year (Table 2), which serves as a management tool to help focus efforts on the most important pesticides from the perspective of MS4 agencies.¹⁷

This year, the investigation assessed most Watch List chemicals,¹⁸ incorporating information from the following surface water monitoring programs:

- DPR: (1) Study 329. *Surface Water Monitoring for Pesticides in Urban Areas of Northern California (FY2020-2021)*, Alvarado 2023 and (2) Study 320. *Ambient Surface Water and Mitigation Monitoring in Urban Areas in Southern California (FY2021-2022)*, Budd 2023.
- USGS California Stream Quality Assessment: Sandstrom, M., Nowell, L., Mahler, B., Van Metre, P., *New-generation Pesticides Are Prevalent in California's Central Coast Streams*, Science of the Total Environment, 806, 2022.
- SFEI: Heberger, M., Sutton, R., Buzby, N., Sun, J., Lin, D., Mendez, M., Hladik, M., Orlando, J., Sanders, C., Furlong, E. *Current-Use Pesticides, Fragrance Ingredients, and Other Emerging Contaminants in San Francisco Bay Margin Sediment and Water*. SFEI Contribution No. 934. San Francisco Estuary Institute, Richmond, CA, 2020.
- Delta Regional Monitoring Program (RMP): Current Use Pesticides monitoring data (available from CEDEN).
- MS4/NPDES monitoring: the Bay Area Municipal Stormwater Collaborative and the Southern California Stormwater Monitoring Coalition.

The available data were compared to aquatic toxicity thresholds, represented by Aquatic Life Benchmarks established by EPA based on Ecological Risk Assessments (ERAs). For the DPR data sets, this comparison was performed by DPR and reported in the associated study reports. DPR's raw data were not reviewed for this investigation. Following the review of monitoring data, additional factors were checked, including section 303(d) impaired waters listings and pesticide product uses. Based on the review, the following Watch List updates were implemented:

Priority 1: The Priority 1 pesticides are well represented in the DPR Northern and Southern California urban monitoring programs, indicating that they are of potential concern for aquatic life impacts in urban receiving waters. While the 2023 CASQA Watch List identified 20 urban-use pyrethroid pesticides, most are not commonly included in water quality monitoring programs. Therefore, the Watch List was adjusted to individually specify the commonly monitored pyrethroids in the Priority 1 list, and moved the remaining pyrethroids to Priority 2, as "other pyrethroids" (with a footnote listing them individually).

¹⁷ The first Watch List was published by the UP3 in 2005.

¹⁸ Pesticides listed in the Watch List as groups were not included in the investigation, including the arsenic, chromium, copper, silver and zinc pesticides, as well as Alkyl Dimethyl Benzyl Ammonium Chloride (ADBAC) pesticides, antimicrobials in paints/coatings, N-Bromosulfamates, Chlorinated isocyanurates, Halohydantoins, Hypochlorites, Mineral oil (aliphatic), and Phenoxo herbicides. These pesticides will be re-evaluated for the Watch List in future years.

Priority 2: The recent monitoring data support continued Priority 2 placement for listed pesticides for which data are available, with one exception. Four pesticides had been listed as Priority 2 due to dioxins impurities: 2,4-D, chlorothalonil, dacthal (DCPA), pentachlorophenol. While 2,4-D remains Priority 2, chlorothalonil and dacthal were moved from Priority 2 to Priority 4, due to the relative lack of detected monitoring data and uncertainties regarding the significance of dioxin toxicity from products for which the active ingredient is not detected. Further, the EPA re-registration documents for these pesticides have yet to acknowledge the dioxins contamination.¹⁹ Pentachlorophenol was removed from the Watch List as it no longer has registered urban uses.

Priority 3: Roughly half of the Watch List Priority 3 pesticides are represented in the DPR, USGS, SFEI and/or Delta RMP monitoring data. DPR monitored for bensulide (Southern California) and trifluralin (Northern and Southern California) but were not detected. Diuron was frequently detected by DPR, USGS, SFEI and Delta RMP monitoring, and in substantial numbers of samples exceeded the Diuron aquatic life benchmarks. Simazine was frequently detected in DPR (Southern California), USGS, SFEI and Delta RMP monitoring.²⁰ The available recent monitoring data supported moving diuron to Priority 1 and simazine to Priority 2.

Table 2. Current Pesticide Watch List

Priority	Basis for Priority Assignment	Pesticides
1	Monitoring data exceeding benchmarks; linked to toxicity in surface waters; urban 303(d) listings	Diuron Fipronil Imidacloprid Malathion Pyrethroids with significant monitoring data: • Bifenthrin • Cyfluthrin • Cyhalothrin (lambda • Cypermethrin • Deltamethrin/Tralomethrin • Esfenvalerate/Fenvalerate • Permethrin
2	Monitoring data approaching benchmarks; modeling predicts benchmark exceedances; very high toxicity and broadcast application on impervious surfaces; urban 303(d) listing for pesticide, degradate, or contaminant that also has non-pesticide sources	2,4-D ²¹ Carbendazim (Thiophanate methyl) ²² Chlorantraniliprole Clothianidin (Neonic) Copper pesticides ⁺ Creosote (PAHs) Indoxacarb Pendimethalin PHMB ⁺

¹⁹ 2,4-D: Addendum to the Draft Ecological Risk Assessment for Registration Review, October 2022, EPA; Chlorothalonil Proposed Interim Registration Review Decision, September 2023, EPA; DCPA Occupational and Residential Exposure Assessment, May 2023, EPA.

²⁰ In addition, EPA has cancelled many simazine uses and banned it in some states (such as Hawai'i) due to Endangered Species Act findings (<https://www.epa.gov/pesticides/epa-releases-final-biological-evaluations-glyphosate-atrazine-and-simazine>).

²¹ May have dioxins as contaminants; there are several bay and estuary 303(d) listings for dioxin compounds.

²² Carbendazim is a registered pesticide, and also a degradate of thiophanate-methyl

Priority	Basis for Priority Assignment	Pesticides	
		Pyrethroids without monitoring data ²³ Simazine Thiamethoxam (Neonic, degrades into Clothianidin) Zinc pesticides (including Ziram) +	
3	Pesticide contains a Clean Water Act Priority Pollutant; 303(d) listing for pesticide, degradate, or contaminant in watershed that is not exclusively urban	Arsenic pesticides Bensulide Chromium pesticides Dichlorvos (DDVP)	Naled Naphthenates Silver pesticides + Trifluralin
4	High or unknown toxicity (parent or degradate) and urban use pattern associated with water pollution; synergist for higher tier pesticide; on DPR priority list	Abamectin ADBAC pesticides ²⁴ + Antimicrobials in paints/coatings Azoxystrobin Bacillus sphaericus + Bacillus thuringiensis + Bromacil N-Bromosulfamates Busan-77 + Carbaryl Chlorinated isocyanurates + Chlorine + Chlorine dioxide + Chlorfenapyr Chlorothalonil ²⁵ Chlorsulfuron Dacthal (DCPA) ²⁶ DCOIT + DDAC + Dichlobenil Dithiopyr Halohydrantoin + Hydramethylnon Hypochlorites + Imazapyr Isoxaben Mancozeb Methomyl Methoprene +	Methoxyfenozide Methyl anthranilate + Mineral bases, weak + Mineral oil (aliphatic) + MGK-264 Novaluron Oryzalin Oxadiazon Oxyfluorfen PCNB Peroxyacetic acid + Phenoxy herbicides ²⁷ Piperonyl butoxide (PBO) Prodiamine Propiconazole Pyrethrins Pyriproxyfen + Sodium bromide + Sodium chlorite + Sodium percarbonate + Sodium tetraborate + Spinosad + / Spinetoram Sulfometuron-methyl Tebuconazole Terbutylazine + Triclopyr Triclosan Trimethoxysilyl quats
5	Frequent questions from partners ²⁸	Glyphosate Metaldehyde	

²³ Allethrin, Cyphenothrin, Etofenprox, Flumethrin, Imiprothrin, Metofluthrin, Momfluothrin, Prallethrin, Sumethrin [d-Phenothrin], Tau-Fluvalinate, and Tetramethrin. Etofenprox is included in SoCal analytes but has not been detected; there continue to be no Northern California monitoring data for etofenprox.

²⁴ Alkyl Dimethyl Benzyl Ammonium Chlorides (ADBAC) includes a family of 21 different quaternary ammonium pesticides.

²⁵ May have dioxins as contaminants; there are several bay and estuary 303(d) listings for dioxin compounds.

²⁶ May have dioxins as contaminants; there are several bay and estuary 303(d) listings for dioxin compounds.

²⁷ MCPA, 2,4-DP, MCPP, and dicamba. 2,4-D is listed separately.

²⁸ Chlorpyrifos and Diazinon, while often asked about, have near zero or no urban uses, respectively.

Priority	Basis for Priority Assignment	Pesticides
Keep Watching	Urban pesticides that may threaten water quality depending on approved urban use patterns.	Acetamiprid (Neonic) Cyantraniliprole Dinotefuran (Neonic) Flupyradifurone (Neonic-like) Sulfoxaflor (Neonic-like)
None	Based on review of available data, no approved urban use or no tracking trigger as yet identified.	Most of the >1,000 existing pesticides
Unknown	Lack of information. No systematic screening has been completed for the complete suite of urban pesticides.	Unknown

2.1.2 Description of Near-Term Regulatory Processes

Immediate pesticide concerns may arise from regulatory processes undertaken at DPR or EPA's OPP. For example, when EPA receives an application to register a new pesticide, there may be two opportunities for public comment that are noticed in the Federal Register, as depicted in green in Figure 3. EPA's process usually takes almost a year while DPR typically evaluates new pesticides or major new uses of active ingredients within 120 days.



Figure 3. EPA's Registration Process for New Pesticides

Another regulatory process, "Registration Review," depicted in Figure 4, is meant to evaluate currently registered pesticides about every 15 years, to account for new data available since initial registration. In general, it takes EPA five to eight years to complete the entire process. In addition to this process, pesticides are evaluated with respect to ESA criteria. EPA regularly updates its schedule for approximately 50 pesticides that will begin the review process in a given year.²⁹



Figure 4. EPA's Registration Review – Process to Review Registered Pesticides at a Minimum of Every 15 Years.

²⁹ See <https://www.epa.gov/pesticide-reevaluation/registration-review-schedules> for schedule information.

DPR also has an ongoing but informal review process (called continuous evaluation) that can address pesticide water quality impairments. If it needs to obtain data from manufacturers, DPR can initiate a formal action called "Reevaluation." These evaluations, mitigation measure development, and mitigation effectiveness evaluation have involved ongoing communication with CASQA and partners.

While EPA must consider water quality in all of its pesticide registration decisions, at DPR this step is not yet fully established as standard (most outdoor urban pesticide registration applications are routinely routed by DPR for surface water review, but a few – notably antimicrobial products used in storm drains – do not automatically receive this review). CASQA monitors registration applications, to identify those relevant to urban runoff, based on the Pesticide Watch List in Table 2 and use pattern/toxicity analysis for pesticides that have not previously been reviewed.

2.1.3 Key Near-Term Regulatory Activities and Progress

Table 3 presents a summary of recent CASQA and partner activities to address near-term regulatory concerns and the latest results; for additional insight regarding ongoing pesticide registrations, see the Appendix for Regulatory Participation Outcomes and Effectiveness Assessment Summary Tables. CASQA monitors the Federal Register and DPR's website for notices of regulatory actions related to new pesticide registrations and registration reviews. This includes monitoring EPA's dockets via the website [regulations.gov](https://www.regulations.gov). Since the Pesticide Watch List is not based on a comprehensive review of all pesticides, CASQA watches for additional pesticides that appear to have any of the following characteristics: proposed urban, outdoor uses with direct pathways for discharge to storm drains, high aquatic toxicity, or containing a priority pollutant. Participating in these regulatory processes can take many years to complete.

In addition, EPA's OPP strives to update their Aquatic Life Benchmarks table on an annual basis.³⁰ In August 2023, EPA's Office of Pesticide Programs, Environmental Fate and Effects Division updated its pesticides Aquatic Life Benchmarks table.¹⁸ These updates included benchmarks for 23 newly registered pesticides (and their degradates) and 11 previously registered pesticides (and their degradates) undergoing registration review (including the Priority 2 pyrethroid, etofenprox).

At the state level, DPR was mandated by legislative action to assess non-agricultural outdoor neonicotinoids. On October 8, 2023, Governor Gavin Newsom signed Assembly Bill (AB) 363 (Chapter 520, Statutes of 2023). This act amended section 12838 of the Food and Agricultural Code and required DPR to evaluate potential impacts to pollinating insects, aquatic organisms, and human health from the use of neonicotinoid pesticides, including acetamiprid, clothianidin, dinotefuran, imidacloprid, and thiamethoxam, for non-agricultural use on non-production outdoor ornamental plants, trees, and turf. The law requires that DPR initiate a reevaluation of these neonicotinoid pesticide products by July 1, 2024. These draft assessments evaluate potential risks to pollinating insects, aquatic organisms, and human health that result from non-agricultural and residential uses of imidacloprid including those by professional handlers in landscape, residential, and recreational settings, use of home (consumer) products, potential post-application exposures, as well as risks from dietary and aggregate exposures. This reevaluation involves 42 registrants and 146 pesticide products currently registered in California. The documents were submitted for scientific peer review to DPR's partner agencies: EPA, and the California Office of Environmental Health Hazard Assessment. No comment period was provided. CASQA will review the documents once they are made public.

CASQA also continues to monitor DPR's efforts with respect to mitigating human health risk associated with fipronil. DPR's Human Health Assessment Branch published the Fipronil Risk Characterization Document in March 2023.³¹ While this analysis is specific to human health, not ecotoxicity, it identified significant occupational exposures from the outdoor use of liquid fipronil concentrate on structures. When there are findings of that nature, the next step is to

³⁰ <https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/aquatic-life-benchmarks-and-ecological-risk>

³¹ https://www.cdpr.ca.gov/docs/whs/active_ingredient/fipronil.htm

develop mitigation for such exposure. CASQA's concern is that the mitigation could include personal protective equipment or other actions that would not reduce ecological exposure. While communication with DPR regarding both mitigation alternatives and opportunities for public engagement are ongoing, the mitigation plan remains unknown.

Table 3. Latest Results of Efforts Communicating Near-Term Regulatory Concerns to EPA³²

Regulatory Action or Concern	CASQA Letters	Partner Support	Outcomes and notes
Pesticides Label White Paper	✓	BACWA, NACWA, SFBRWQCB	<i>Pending.</i> CASQA is recommending that EPA: • Harmonize pesticide labeling practices with those developed by the World Health Organization and United Nations, including standards for font and pictogram usage and sizing. • Simplify pesticide label language to better accommodate the reading level of adults in the United States. • Provide pesticide labels in multiple languages.
Etofenprox Interim Decision (ID)	✓	BACWA	<i>Continued Success!</i> The ID continued to incorporate all the restrictions presented in the Proposed Interim Decision (December 2022). Under the proposed label language, etofenprox would only be allowed to be sprayed on impervious surfaces in limited circumstances (See Appendix). Further, EPA used CASQA's suggested pictogram, used CASQA's proposed minimum sizing for graphic, and included Spanish translation. EPA also included improved rain restriction language, water protection statements, explicit mention of outdoor/indoor use, and specifically defined the spot treatment size.
Ziram Amended Proposed Interim Decision (PID)	✓		<i>Success!</i> The Amended PID indicated that the antimicrobial mitigation measures were continuing to move forward unchanged. This includes the deletion of ziram as a material preservative in paint as well as a reduction in the maximum concentration in building materials (from 9,825-29,500 ppm to 1680 ppm). (See Appendix)
Chlorothalonil PID	✓		<i>Pending.</i> CASQA is supporting EPA's proposed label improvements for conventional uses of chlorothalonil while asking for additional mitigations for the antimicrobial uses of chlorothalonil, specifically uses that occur outdoors, with potential exposure to rain, such as paints, coatings, and wood treatments: • Revise the proposed label improvements labels to units that are more intelligible for urban users: ○ For application area to be stated in square feet instead of acreage;

³² Color coding in this table is meant to reflect the Pesticide Watch List prioritization color coding in Table 2.

Regulatory Action or Concern	CASQA Letters	Partner Support	Outcomes and notes
			- o For liquid formulations to be stated fluid ounces instead of pounds for liquid formulations. • An increase in the rain delay warning on the chlorothalonil label to 48 hours instead of 24 hours. Since EPA is already implementing this change to a 48-hour delay on other pesticide labels, implementing this recommendation would also provide label consistency for pesticide users.
IPBC (3-Iodo-2-propynyl butylcarbamate) Draft Risk Assessment (RA)	✓	BACWA	<i>Pending.</i> The Draft RA acknowledged several data gaps in the IPBC ecotoxicity dataset: • Chronic ecotoxicity endpoints for freshwater invertebrates • Ecotoxicity endpoints for aquatic vascular plants • Ecotoxicity endpoints for benthic species CASQA recommended that EPA require registrants to submit the missing ecotoxicity data as noted above for freshwater invertebrates, aquatic vascular plants, and benthic species, and reevaluate risk to aquatic life with this information included.
Oxyfluorfen Amended PID	✓		<i>Success!</i> CASQA supported EPA's proposed mitigation, including the cancelation of residential uses, covering all residential turf and ornamental products. The expectation is that a cancelation will contribute to the reduction of oxyfluorfen present in urban runoff, thereby reducing ecological risks to aquatic invertebrates. EPA received many comments from pesticide registrants as well as the USDA which argued that there should not be a ban on residential uses of oxyfluorfen. EPA decision was consistent with CASQA's recommendation: <i>"The Agency has considered retaining residential application of oxyfluorfen by commercial applicators. However, it is not possible to preclude residential users from using products intended for professional applicators; therefore, residential uses will be removed from all products."</i>

2.2 LONG-TERM CHANGE IN THE PESTICIDES REGULATORY STRUCTURE

Since the mid-1990s, CASQA (and its predecessor organization the Stormwater Quality Task Force) has worked toward a future in which the pesticide regulatory structure at the state and federal level proactively restricts pesticide uses that have the potential to cause urban water quality problems. These efforts directly relate to Phase II MS4 PEAIP Management Question 2.

Assessment Question 2. (Long term / Prevent future problems) – Do pesticides regulators have an effective system in place to exercise their regulatory authorities to prevent pesticide toxicity in urban water bodies?

Answer: Improvements in processes at EPA and especially at DPR have moved closer to that future. Many of these improvements are linked to the persistent work of CASQA and partners to educate regulators on how previous process deficiencies did not adequately address urban pesticide problems.

Overall, DPR has a system in place that is reasonably effective at addressing pesticide toxicity in urban water bodies, although improvement is needed to better coordinate this process with the requirements of the Clean Water Act and MS4 permits. DPR and the Water Board, along with CASQA and other stakeholders, are working diligently to strengthen this system and to institutionalize it. The goal is to embody this process in the State's UPPs and the Management Agency Agreement (MAA) between DPR and the State Water Board. In addition, DPR published an SPM Roadmap (See *Section 2.2.1*) which is expected to be implemented in coming years, incorporating urban pesticide uses.

At the Federal level, OPP has implemented some improvements in how it evaluates and responds to water quality problems associated with pesticides, but it does not yet do this reliably and does not have a system in place to ensure that this will happen consistently and adequately. Meanwhile, scientific studies are being conducted by USGS and EPA's Office of Research and Development to better understand the complexities of pollution in urban stormwater. In addition, another EPA branch, the Office of Chemical Safety and Pollution Prevention, tasked their Pesticide Programs staff with improving the integration of the EPA and the Services³³ implementation of the ESA.

³³ The U.S. Fish and Wildlife Service and the U.S. National Marine Fisheries Service (collectively referred to as the Services) are jointly responsible for administering the ESA. The National Marine Fisheries Service has jurisdiction for marine endangered species, while U.S. Fish and Wildlife Service has jurisdiction for freshwater and all other species.

2.2.1 Focus on DPR's Long Term Approach

In 2021, DPR formed a Sustainable Pest Management Work Group, the goal of which was “to develop a recommended roadmap with ambitious, measurable goals to practically achieve the state’s vision to accelerate a system-wide transition to safer, more sustainable pest management.”³⁴ A nine-member urban subgroup was formed to ensure that urban pesticides uses were effectively incorporated. The work group defined SPM as a “holistic, whole-system approach applicable in agricultural and other managed ecosystems and urban and rural communities that builds on the concept of integrated pest management (IPM) to include the wider context of environmental protection, economic vitality, and human health and social equity.”

In January 2023, DPR released the final SPM roadmap. To achieve urban SPM, DPR has identified 4 leverage points in the system. CASQA will seek opportunities to support DPR's SPM within each of these points:³⁵

1. Enhance data and information collection for urban pesticide use
2. Advance research and outreach on urban pest management issues
3. Make SPM the preferred choice for both licensed and unlicensed users
4. Refocus urban design, building codes, and regulations to enhance pest prevention

To reliably fund DPR's new focus, the State conducted a feasibility analysis to consider incremental increases of the mill assessment from the current \$0.021 up to \$0.0339 per dollar of pesticide sales. DPR's mill assessment is paid by a pesticide retailer or manufacturer when a pesticide is first sold into California and provides approximately 80 percent of the department's current funding. The mill assessment has not been increased since it was originally codified into state law in 2004. In the 2024-25 state budget, the Governor proposed an increase of the mill assessment over a three-year period, from the \$0.021 to (1) \$0.026 in 2024-25, (2) \$0.027 in 2025-26 and (3) \$0.0286 in 2026-27. The budget authorized DPR to further adjust the assessment to align revenues with expenses, not to exceed a new cap of \$0.0339.³⁶

2.2.2 Focus on California's Urban Pesticides Provisions (UPP)

In 2014 the State Water Board established an urban pesticides reduction project (now titled the Statewide Urban Pesticides Provisions or UPP) as a top priority project under the comprehensive stormwater strategy, known as “Strategy to Optimize Resource Management of Storm Water” or STORMS.³⁷ CASQA has been actively supporting the development of the Urban Pesticide Provisions since their inception.

CASQA Asks DPR to Prioritize Urban Pesticides Based on Use

Prioritizing pesticides by groups of related products is especially important in the urban context where consumers consider products based on use (“What will take care of my ant problem?”) versus active ingredient. The January 2023, the SPM Roadmap described science-based prioritizations based on use and/or pest versus individual pesticides. However, in September 2023, DPR released a draft 2024-2028 Strategic Plan in which the wording implied a siloed analysis focused on active ingredient, rather than on product uses or pest/location use. CASQA provided feedback to DPR asking that the language be updated to parallel the SPM Roadmap. CASQA is awaiting release of the final 2024-2028 Strategic Plan.

³⁴ https://www.cdpr.ca.gov/docs/sustainable_pest_management_roadmap/

³⁵ https://www.cdpr.ca.gov/docs/sustainable_pest_management_roadmap/spm_executive_summary.pdf

³⁶ <https://lao.ca.gov/reports/2024/4873/Department-of-Pesticide-030524.pdf>

³⁷ http://www.waterboards.ca.gov/water_issues/programs/stormwater/storms/

	Our Water, Our World (OWOW) Supports Current and Anticipated Permit Requirements OWOW is a collaboration of municipalities and integrated pest management (IPM) experts to develop and distribute IPM information directly to consumers at point-of-purchase at garden centers and hardware stores, thereby reducing the purchases of harmful products. OWOW started as a pilot project in 1998, in just a handful of stores, initiated by the Central Contra Costa County Sanitation District, the City of Palo Alto Regional Water Quality Control Plant, and the Marin Countywide Stormwater Pollution Prevention Program. The program quickly grew and was administered by the former Bay Area Stormwater Management Agencies Association from 1999 – 2021. In January 2022, the program was transferred to CASQA, with the goal of providing statewide access to this important and successful outreach program. While several stormwater programs currently rely upon OWOW to meet existing permit requirements, statewide implementation is expected to grow, if incorporated into the UPPs. OWOW materials could also be crucial in supporting DPR's SPM urban educational outreach campaigns.

2.2.3 CASQA Participation in Federal and State Advisory Groups

As presented in Table 4, CASQA remains actively involved with various agencies and advisory groups that affect urban pesticide use and pest management.

Table 4. Participation in Federal and State Efforts to Support CASQA's Goals

Agency or Conference	Latest Outcomes
EPA's Pesticide Program Dialogue Committee (PPDC)	The 40-person committee, chaired by the Director of OPP, includes representatives from growers, industry, environmental, public health, farmworkers, as well as state/local/tribal government. The PPDC holds biannual public meetings. At the June 2024 meeting, key CASQA topics included: • A discussion of label reform, including digitization and standardization; • An update on the Endangered Species Act Workplan by the Deputy Assistant Administrator for Pesticide Programs for Office of Chemical Safety and Pollution Prevention. • A discussion of bilingual label updates, which will occur 2025-2030, with translations for the most hazardous and toxic pesticide products required first.
DPR's Pest Management Advisory Committee (PMAC)	Victoria Kalkirtz (co-chair of the TSC Subcommittee) participates on the PMAC. Participation on the PMAC has resulted in expanded focus by DPR on urban pest management and water quality issues and generated funding for urban IPM research and implementation programs. In February 2024, the following urban outdoor pesticide research proposals were assessed by PMAC: • Dr. Barbara Baer-Imhoof, UC Riverside "Empowering Disadvantaged and Underserved Communities: Sustainable Beekeeping and Gardening through Integrated Pest Management", \$458,612 • Dr. Paul English, Public Health Institute "Redevelopment of the Pesticide Mapping Tool to Increase Pesticide Use Reporting Data Access and Utility for Integrated Pesticide Management Outreach, Public Health Awareness, and Environmental Protection" \$365,537 • Mr. Yale Jeffery, City of Vista "Sustainable IPM Program in The City of Vista" \$167,203

Section 3. CASQA's Approach Looking Ahead

At any given time, EPA and DPR may be in the process of evaluating and registering various pesticides for urban use. CASQA will continue to track and engage in EPA and DPR activities, with a focus on top priority active ingredients (as identified in the annual Pesticide Watch List) and sharing relevant urban runoff information and CASQA's water-quality specific expertise with pesticides regulators. Key documents to be reviewed will include risk assessments and risk management proposals with an eye toward ensuring that pesticide regulators have and consider accurate information on relevant factors in urban areas such as pesticide use patterns, urban pollutant transport mechanisms, and receiving water conditions. CASQA strives to ensure that pesticide regulators have access to relevant information such as monitoring data, water quality regulatory requirements, and urban runoff agency compliance liabilities and cost information. As necessary, CASQA will continue to recommend changes in an individual pesticide's allowable uses or use instructions, request consideration of impacts on water bodies receiving urban runoff, and/or ask that regulators fill critical data gaps by obtaining more data from manufacturers. As resources allow and circumstances warrant, CASQA will continue to collaborate with wastewater organizations (such as BACWA), other water quality stakeholders, and the Water Boards in commenting on EPA and DPR actions.

In the coming year, CASQA will continue to address near-term pesticide concerns and seek long-term regulatory change. Although changes at the federal level are important for fully achieving CASQA's goal of protecting water quality through the effective use of pesticide regulations, CASQA will also continue to focus efforts on solidifying progress at the state level. In the coming year, CASQA will continue engagement on specific regulatory actions for priority pesticides at the federal level, while continuing to support the State's development of the UPPs. The pesticide program's focus areas are the following:

(1) Continue collaboration with DPR to address near-term regulatory concerns, while seeking OPP and OW actions to reduce inconsistencies:

- 💧 Ensure DPR action on fipronil water pollution is completed, including effective professional user education about restrictions on its outdoor urban use.
- 💧 Ensure DPR enforces mitigation measures for pyrethroids and fipronil, and adopts additional measures as necessary.
- 💧 Ensure the state continues to conduct surveillance monitoring to evaluate pyrethroids and fipronil mitigation effectiveness and to evaluate occurrence of new threats like imidacloprid and other neonicotinoid insecticides.
- 💧 Continue to encourage EPA to complete scientific groundwork and to identify and implement pyrethroids, fipronil, malathion, and imidacloprid mitigation measures, recognizing that it is likely that necessary mitigation cannot readily be implemented entirely by DPR.

(2) Seek long-term changes in the pesticide regulatory structure:

- 💧 Continued engagement with EPA regarding incorporating their ESA obligation in registrations and re-registrations, including recommending the use of pictograms in labels, and seeking opportunities in California for EPA's future regional and vulnerable species pilot programs.
- 💧 Continued engagement with DPR regarding the SPM Roadmap specific to urban implementation programs and opportunities.
- 💧 Advocate for the importance and reprioritization of the statewide UPP to implement the restructuring of California's urban surface water pesticides monitoring to increase its effectiveness and improve coordination.
- 💧 Encourage and assist the Water Board to continue to implement its MAA with DPR to prevent and mitigate pesticide impairments through more effective pesticide regulation.

- Seek procedure changes such that DPR continues to refine its registration procedures to address remaining gaps in water quality protection.
- Seek increased transparency of DPR regulatory activities, including timely access to scientific evaluation reports that are the basis of registration decisions.

CASQA will continue to seek opportunities to coordinate on high priority regulatory actions, with the Water Boards and other water quality stakeholders, to take advantage of efficiencies, increase effectiveness, and ensure that the water quality community has a consistent message. Table 5 presents CASQA's activities anticipated for the coming year; CASQA will conduct these activities as priorities indicate and resources allow. Table 6 summarizes upcoming regulatory action items that are likely to proceed and may require CASQA attention in the coming year.

Table 5. CASQA Pesticide Activities

Activity		Purpose
Regulatory Tracking	Track Federal Register notices	Identify regulatory actions for high priority active ingredients that may require review.
	Track DPR notices of registration applications and decisions	Identify pesticides meriting surface water review that are not within DPR's automatic routing procedures, identify gaps or potential urban runoff-related problems with current DPR evaluation or registration plans other regulations, procedures, and policies.
	Track activities at the Water Boards	Identify opportunities for improvements in TMDLs, Basin Plan Amendments, and permits.
	Review regulatory actions, guidance documents, and work plans	Identify potential urban runoff-related problems with current EPA evaluation or registration plans, other regulations, procedures, and policies.
Regulatory Communications	Briefing phone calls, informal in-person meetings, teleconference meetings, and emails with EPA and DPR	Information sharing about immediate issues or ongoing efforts; educate EPA and DPR about issues confronting water quality community. Provide early communication on upcoming proceedings that help reduce the need for time-intensive letters.
	Convene formal meetings, write letters, and track responses to letters	Ensure current pesticide evaluation or registration process accurately addresses urban runoff and urban pesticide use and management contexts. Take advantage of opportunities to formally provide information and suggest more robust approaches that could be used in future regulatory processes. Request and maintain communication on mitigation actions addressing highest priority pesticides.
Advisory	Serve on EPA, DPR, and Water Board policy and scientific advisory committees	Provide information and identify data needs and collaboration opportunities toward development of constructive approaches for managing pesticides.
Educational	Presentations to and informal discussions with EPA, DPR, Water Board, CASQA members,	Educate EPA, DPR, Water Board, and CASQA members about the urban runoff-related shortcomings of existing pesticide regulatory process, educational efforts to support process improvements, and report on achievements. Encourage research and monitoring programs to address urban runoff data needs and priorities. Stimulate academic, government, or private development of analytical and toxicity identification methods to address anticipated urban runoff monitoring needs. Inform development of new pesticides by

Activity		Purpose
		manufacturers and selection of pesticides by professional users.
	Develop and deliver public testimony	Educate Water Board members about the problems with existing pesticide regulatory process, encourage change, and report on achievements.
Monitoring and Science	Update Pesticide Watch List based on new scientific and regulatory information	The Pesticide Watch List (Table 2) serves as a management tool to prioritize and track pesticides used outdoors in urban areas.
	Data analysis of DPR/SWAMP/USGS/MS4 monitoring, pesticide use data, and information from scientific literature	Summarize data to educate CASQA members and water quality community, Water Boards, DPR, and EPA.
Reporting	Prepare Monthly Action Plans	Coordinate CASQA's regulatory actions with partners
	Prepare Annual Report to describe the year's status and progress, provide detail on stakeholder actions, and the context of prior actions as well as anticipated end goal of these activities.	Provide CASQA's members with focused information on its efforts to prevent pesticide pollution in urban waterways. The document serves annual compliance submittal for both Phase I and Phase II MS4s. It may also be used as an element of PEAPs and future effectiveness assessment annual reporting.

Table 6. Anticipated Upcoming Opportunities for Pesticides Regulatory Engagement

EPA Pesticide Registration Review (15-year cycle) (organized chronologically by anticipated next regulatory step) ³⁸			
Priority	Topic	Item	Urban Runoff Concern
Unknown	New Antimicrobials	various	Varied; many of these pesticides are showing up for the first time at the PID level; review is needed to screen these for water quality issues
1	Allethrins	Preliminary Work Plan	Monitoring data exceeding benchmarks; linked to toxicity in surface waters; urban 303(d) listings.
1	Malathion	PID	303(d), toxicity, monitoring data
2	2,4-D	PID	Pesticide with dioxins impurity
2	Dacthal (DCPA)	RA	303(d) listings (dacthal, dioxins); Contains CWA Priority Pollutants (dioxins)
4	Mancozeb	PID	Central Valley Water Board high relative risk

³⁸ RA = Risk Assessment; PID = Proposed Interim Decision

Priority	Topic	Item	Urban Runoff Concern
1	Allethrin	Preliminary Work Plan	Monitoring data exceeding benchmarks; linked to toxicity in surface waters; urban 303(d) listings.
1	Fipronil	PID	Monitoring data; Anticipated 303(d) listings
1	Imidacloprid	Re-release of PID (ESA process)	High toxicity, monitoring data, 303(d) listings
2	Clothianidin (neonic)	Re-release of PID (ESA process)	High toxicity, monitoring data, 303(d) listings
2	Thiamethoxam (neonic)	Re-release of PID (ESA process)	High toxicity, monitoring data, 303(d) listings
3	Dichlorvos (DDVP)	PID	Organophosphate insecticide
3	Naled	PID	Degrades to DDVP
4	Dicamba	PID	Toxicity, stormwater monitoring data
4	Isothiazolinones (includes DCOIT, BBIT, BIT, MIT, OIT)	RA	Antimicrobials. Uses include paints.
4	Peroxy Compounds (peroxyacetic acid)	PID (re-release)	Fountain chemical
4	Bacillus thuringiensis (Bt)	Draft RA	Used in pools, spas, and fountains.
4	Piperonyl butoxide (PBO)	PID	Pyrethroid synergist
4	Pyrethrins	PID	Related to pyrethroids, but less stable and less toxic
4	Tebuconazole	PID	Fungicide
4	MGK-264	PID	Re-release of PID after litigation. 303(d) listing
Keep Watching	Acetamiprid	PID	Neonicotinoid, toxicity
Keep Watching	Dinotefuran (neonic)	PID	Toxicity, mobility

Other EPA-related Items

- Quarterly updates to the ESA Workplan website:
 - <https://www.epa.gov/endangered-species/epas-workplan-and-progress-toward-better-protections-endangered-species>

- U.S. EPA [“Increasing Consistency and Transparency in Considering Costs and Benefits in the Rulemaking Process”](#) affects how the U.S. EPA uses cost and benefit analysis in setting pollution standards. Rule proposal was expected in 5/19.
- Proposed rule to eliminate some OPP Federal Register Notices (was anticipated September 2018 according to U.S. EPA semi-annual regulatory agenda)
- U.S. EPA [Update to Guidelines for Deriving Aquatic Life Water Quality Criteria](#). Draft scoping document external peer review is next step. Seeking OPP engagement.

DPR New Pesticide Product Registration Decisions

New Product Applications (Active ingredient – product name)	Why tracking	Current Status
1R-Phenothrin - by MGK	Outdoor uses	Noted on EPA docket. Not yet in DPR Notice.
Tetraniliprole	Outdoor uses	Noted on EPA docket. Not yet in DPR Notice.
Momfluorothrin (and Phenothrin) - S-1563	New urban pyrethroid	2014: DPR confirmed that Surface Water would review.
Momfluorothrin (and Cypermethrin) - MGK Products	New urban pyrethroid	2014: DPR confirmed that Surface Water would review.
Alpha-cypermethrin - Fendona CS	New urban pyrethroid	2018: DPR confirmed that Surface Water would review.
Transfluthrin - Bayer Product	New urban pyrethroid. Indoor and outdoor uses	Noted on EPA docket. Not yet in DPR Notice.
Fipronil and Bifenthrin - Taurus Trio G	Landscaping product	2017: DPR confirmed that Surface Water would review.
Fipronil - Termidor HP II	Termite product	2018: DPR confirmed that Surface Water would review.
Fipronil - MGK Formula 3115	Outdoor yellow jacket product	2019: DPR confirmed that Surface Water would review. 7/9/21: Notice of Final Decision posted. Product limited to bait stations.
Indoxacarb - Doxem Precise	New aerated indoxacarb powder	2019: DPR confirmed that Surface Water would review.
Zinc, Thiabendazole and 2-pyridinethiol-1-oxide – Ultra-Fresh DW-30	Potential use in vehicle tires	DPR is asking the registrant of that product that should not have been approved for use in rubber to change the product label to again say “not for use in California” with regard to the use in rubber.
Fipronil – Imidacloprid: Fuse Foam by Control Solutions, Inc.	Indoor/outdoor fipronil-imidacloprid foam	BACWA/CASQA have been tracking this product since 2017. 7/2/2021: DPR issues notice to deny, noting several problems with the label. 5/27/2022: DPR confirmed that the label that they are reviewing is the same as the label available on the EPA website.

Other DPR-related Items

- Registration Application Surface Water Reviews – continue to follow up on communications requesting review of all storm drain products and outdoor antimicrobials
- [DPR's Sustainable Pest Management Roadmap](#)
- [CA DPR Fipronil Human Health Risk Assessment and Mitigation](#). DPR finalized the fipronil Risk Characterization Documents (RCD) in May 2023. The final exposure assessment document (EAD), response to comments from US EPA, Office of Environmental Health Hazard Assessment, and other documents are posted at the link above. DPR is evaluating exposure scenarios of concern identified in the RCD, as well as comments specific to the risk mitigation process, and will issue a risk management directive (RMD) if DPR determines that mitigation is required.
- [CA DPR Non-Agricultural Outdoor Neonicotinoids](#). AB 363 requires that CA DPR re-evaluate pesticide products containing the neonicotinoid active ingredients acetamiprid, clothianidin, dinotefuran, imidacloprid, and thiamethoxam, intended for non-agricultural use on non-production, outdoor ornamental plants, trees, or turf. The re-evaluation must evaluate impacts to pollinating insects, aquatic organisms, and human health, taking into account relevant routes of exposure. The text of AB 363 has a detailed timeline for each part of the assessment and requires that DPR adopt all necessary control measures on or before July 1, 2029.

Water Boards

- State Water Board [Urban Pesticides Provisions](#).
 - *Consolidation and Reissuance of Statewide (NPDES) General Permits for Residual Aquatic Pesticide Discharges*. The State Water Board intends to consolidate four existing pesticide general permits into a single statewide pesticide general permit to promote consistency in permit implementation. The existing 4 permits regulate the discharge of pesticides used for (1) aquatic weed and algae control, (2) vector control, (3) invasive animal species control, and (4) spray applications conducted by the California Department of Food and Agriculture. The tentative timeline for reissuance is June 2025. Public comment periods, release of draft permits, and adoption dates will be announced through the State Water Board's public noticing process.
 - Pesticides 303(d) listings
 - Pesticide TMDL implementation requirements for permittees
-

Other Statewide Items

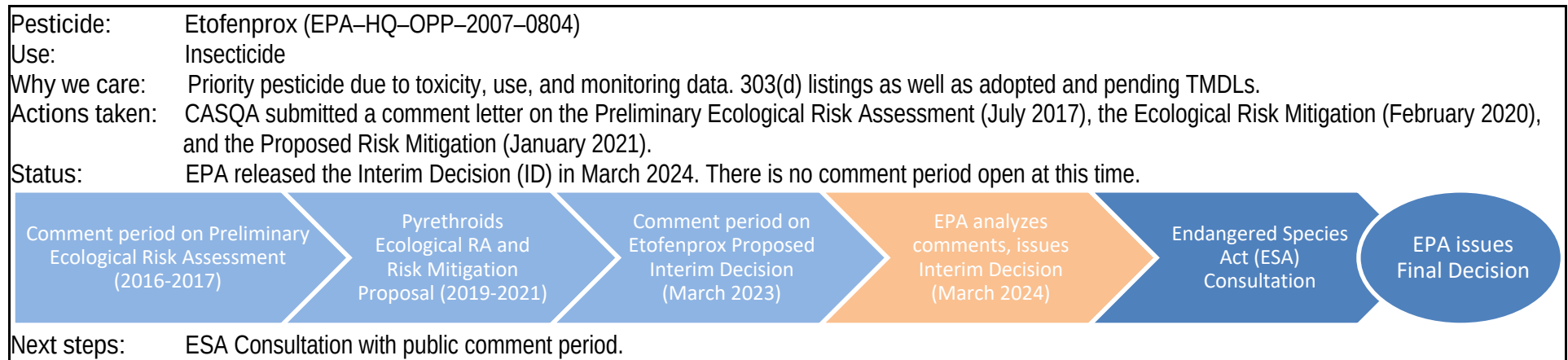
- [Draft Urban Stormwater Management Strategy by the CA Dept. of Water Resources](#). “The Update 2023 RMS updates reflect that climate change has driven water managers to develop and extend resource management for sustainability and resilience, and that social change has brought new focus to equity issues and community resilience.” Pesticides are discussed in the draft Urban Stormwater Runoff Capture and Management RMS.
 - [California Department of Food & Agriculture Program EIR on invasive species](#) control covering potential broadcast pesticide applications urban areas of multiple priority pesticides. [October 2021 update](#): California’s Court of Appeal has ruled that a statewide pesticide-spraying program violates the law by failing to study and minimize the threats from pesticides and to properly inform the public about the risks of spraying. The ruling noted that the department did not analyze or disclose the health and environmental harms of the more than 75 pesticides. The court decision also noted a lack of public notice. Furthermore, they did not evaluate local impacts or allow opportunity for affected communities to opt out. June 2022 Update: New ruling by Sacramento County Superior Court orders the state to halt spraying.
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Appendix: Regulatory Participation Outcomes and Effectiveness Assessment Summary Tables

Ziram Regulatory Participation Outcome and Effectiveness Assessment Summary Table

Pesticide: Ziram – EPA-HQ-OPP-2015-0568 Why we care: Fungicide/antimicrobial used in building products, including paint, caulks, and sealants. Highly toxic to aquatic life. Actions taken: CASQA sent a comment letter to EPA on the Draft Ecological Risk Assessment (Draft RA) in 2021 and the Proposed Interim Registration Review Decision (PID) in 2022. Status: EPA released the Amended PID on April 30, 2024 with a due date for comments set for July 1, 2024. The Amended PID does not include antimicrobial uses.		
<pre> graph LR A[Comment period on Draft Work Plan (2015)] --> B[Comment period on draft Risk Assessment (2021)] B --> C[Comment period on PID (2022)] C --> D[Comment period on Amended PID (due 7/1/24)] D --> E[EPA analyzes comments, issues Interim Decision] E --> F[Endangered Species Act (ESA) Consultation] F --> G([EPA issues Final Decision]) </pre>		
Next steps: EPA will issue an Interim Decision. Recommendation: No action needed. The portion of the assessment that is of interest to CASQA (antimicrobials) is in the process of being finalized and there is no opportunity for comment at this point.		
CASQA 5/19/2022 Comments to EPA	EPA Response (Ziram Amended Proposed Interim Registration Review Decision, Case Number 8001, March 2024)	Did EPA incorporate CASQA's comment?
CASQA Supports the Proposed Mitigation, Including Cancellation of All Ziram Paint Products To mitigate risks, EPA has proposed several significant mitigation measures, including the deletion of ziram as a material preservative in paint as well as a reduction in the maximum concentration in building materials (from 9,825-29,500 ppm to 1680 ppm). CASQA supports these proposed mitigations as they will reduce the potential threat to aquatic life in the surface waters that receive runoff from those watersheds.	"In the 2021 PID, mitigation measures for antimicrobial uses were proposed for public comment. Because no changes are being made to what was proposed in 2021 PID for antimicrobial uses, this amended PID focuses solely on conventional uses of ziram. EPA intends to issue a separate registration review decision for antimicrobial uses, which will post to the same public docket opened for this registration review case." (Amended PID, p. 4)	Yes. The amended PID was only amended with respect to the conventional uses (rather than antimicrobial), indicating that EPA is moving forward with cancellation of ziram uses in outdoor paints and reduction of ziram uses in other outdoor building materials.

Etofenprox Regulatory Participation Outcome and Effectiveness Assessment Summary Table



CASQA 3/23/2023 Comments to EPA	EPA Response	Did EPA incorporate CASQA's comment?
CASQA SUPPORTS EPA'S PROPOSED MITIGATION MEASURES FOR ETOFENPROX Given the high degree of threat posed by the use of pyrethroids such as etofenprox in the urban environment, as thoroughly documented in the Draft ERA and PID, CASQA supports the inclusion of the following proposed mitigation measures as enumerated in the PID: 1. Reduction of area of application of etofenprox on and around structures. Under current permitted use, etofenprox can be used up to three feet up the side of an outdoor structure and up to three feet horizontally out from an outdoor structure, on impervious surfaces. Under the proposed mitigations in the PID, horizontal applications are limited to up to 1-inch from the structure, and vertical applications are limited to up to 2-feet above ground level: "Applications around potential exterior pest entry points into man-made structures such as doorways and windows, when limited to a band not to exceed one inch" and "Applications to vertical surfaces (such as the side of a man-made structure) directly above impervious surfaces (e.g., driveways, sidewalks, etc.), up to 2 feet above ground level" (PID, p.60) 2. Addition of clarification for which pesticides are used outdoors versus indoors. CASQA appreciates the proposed addition of language to the	EPA acknowledged CASQAs comments. "Writing on behalf of the CSQA (sic), Karen Cowan, Executive Director, noted that as documented in the PID, non-agricultural uses of etofenprox may result in surface water concentrations which are toxic to non-target organisms and represents a regulatory burden for CSQA municipal agency members. According to Ms. Cowan, the CSQA supports the mitigation measures proposed in the PID, which include: • reduction of area of application of etofenprox on and around structures; • additional clarification on which pesticides are used outdoors versus indoors; • addition of disposal statement; • addition of stewardship statement that includes a Spanish translation; and, • addition of buffer from water statement, water protection statements, and crack and crevice runoff statements." (Etofenprox: Response to Public	Yes. EPA continued to incorporate the proposed label mitigations that CASQA supported in its 2021 comment letter.

CASQA 3/23/2023 Comments to EPA	EPA Response	Did EPA incorporate CASQA's comment?
labels to clarify which products are "For outdoor use only" versus "For indoor use only" versus "For both indoor and outdoor use." (PID, p.58, 60) 3. Addition of disposal statement. CASQA agrees with the proposed disposal statement for etofenprox products: "Do not pour or dispose down the drain or sewer. Call your local solid waste agency for local disposal options." (PID, p.58) 4. Addition of stewardship statement that includes a Spanish translation. CASQA supports the addition of the following stewardship statement, including the pictogram and Spanish translation. (PID, p.59) Note to registrants: If adding stewardship statements on end-use consumer products, the followings language is required and placed in a prominent location: For products without drain treatment uses: "Do not allow to enter indoor or outdoor drains" "No permita la entrada a desagües internos o externos." For products with drain treatment uses: "Do not allow to enter indoor or outdoor drains unless labeled for drain treatments." "No permita la entrada a desagües internos o externos a menos que el etiquetado indique que está permitido el uso del producto para tratamiento de desagües." For products with and without drain treatment uses: "Follow proper disposal procedures on this label" "Sigla las indicaciones del etiquetado para el desecho apropiado del producto." Graphic on the product package showing an image of a diagonal strikethrough over a drain. The pictogram must be legible (i.e. no smaller than 1.5 square centimeters or 0.25 square inches unless this size is greater than 10% of the size of the label). Use the following pictogram on product labels: 5. Addition of buffer from water statement, water protection statements, and crack and crevice runoff statements. CASQA supports the following proposed label mitigations. (PID, p.61) "Buffer from Water Statement: For soil or foliar applications, do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent	Comments on the Preliminary Interim Decision (May 10, 2023), p. 3)	

CASQA 3/23/2023 Comments to EPA	EPA Response	Did EPA incorporate CASQA's comment?
streams, marshes or natural ponds, estuaries and commercial fish farm ponds." and "Water Protection Statements: Do not apply the product into fish pools, ponds, streams, or lakes. Do not apply directly to sewers or storm drains, or to any area like a drain or gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur." "Do not allow the product to enter any drain during or after application." "Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment." "Do not apply or irrigate to the point of runoff." and "Crack and Crevice treatments • "Treat surfaces to ensure thorough coverage but avoid runoff." • "To treat insects harbored in voids and cracks-and-crevices, applications must be made in such a manner to limit dripping and avoid runoff onto untreated structural surfaces and plants." <u>CASQA Recommendation:</u> CASQA supports EPA's proposed label language mitigations for etofenprox		
CASQA SUGGESTS LABEL MITIGATION MEASURES (STORM EVENT RESTRICTION) FOR CONSISTENCY The PID includes the following rain-related statement mitigation: "Rain-Related Statements: Do not make applications during rain. Avoid making applications when rainfall is expected before the product has sufficient time to dry (minimum 4 hours)." "Rainfall within 24 hours after application may cause unintended runoff of pesticide application." (PID, p.61) Since the release of the etofenprox PID, EPA released the "Preliminary Analysis of the Effectiveness of a 48 Hour Rain Restriction to Reduce Pesticide Runoff ." EPA's analysis showed that a 48-hour prohibition of pesticide application when rain is forecasted can result in "a 10-40% decrease in 1-in-10 year daily average runoff-only estimated environmental concentrations (EECs) in the EPA standard farm pond. The rain restriction exhibits the largest impact for pesticides with a low organic carbon-normalized sorption coefficient (Koc) or a soil or foliar	"With respect to the recommendation from the CSQA (sic) to include label language to avoid applications when rainfall is expected and to extend the 24-hr restriction to 48 hrs, the agency has currently proposed language indicating that applications should not be made during rain and to avoid making applications when rainfall is expected before the product has sufficient time to dry (minimum 4 hours). The proposed label also indicates that "rainfall within 24 hours after application may cause unintended runoff of pesticide application." (Etofenprox: Response to Public Comments on the Preliminary Interim Decision, May 10, 2023, p.7) "The Agency has currently proposed language indicating that applications should not be made during rain and to avoid making applications when rainfall is expected before the product has sufficient time to dry	Partially. EPA is including label language in its proposed mitigation to indicate that applications should not be made during rain, and to avoid applications where product would have less than 4 hours to dry prior to rain. EPA also noted that they are in the process of evaluating whether a 48-hour rain delay would be appropriate in this case. (The time period on this evaluation is unknown.)

CASQA 3/23/2023 Comments to EPA	EPA Response	Did EPA incorporate CASQA's comment?
degradation half-life of 1 day, with a 30-40% decrease for the most mobile or least persistent pesticides modeled." (Rain-restriction Memo, p. 1-2) Changing the rain restriction timing can make a significant difference in runoff. CASQA requests that EPA change this restriction in the etofenprox label mitigations to make them consistent with other pesticide label requirements. CASQA Recommendation: CASQA suggests modifying the above label mitigations to require a 48-hour rain restriction instead of a 24-hour rain restriction.	(minimum 4 hours). The proposed label language also indicates that "rainfall within 24 hours after application may cause unintended runoff of pesticide application." The Agency considers a 48-hour rain restriction to be directionally correct as such a restriction can reduce pesticide runoff by providing more time for degradation of a pesticide before runoff events occur. However, the degree of reduction will vary based on the specific environmental conditions and how the application, rainfall, runoff potential, drift potential, and waterbody characteristics combine. The Agency is in the process of evaluating these factors to determine those chemicals/scenarios where such a restriction would be most effective." (ID, p.13)	

Oxyfluorfen Regulatory Participation Outcome and Effectiveness Assessment Summary Table

Pesticide: Oxyfluorfen (EPA–HQ–OPP–2014–0778) Use: Herbicide Why we care: Priority pesticide due to toxicity, use, and monitoring data. 303(d) listings (agricultural). Listed on DPR’s monitoring priority list. Actions taken: CASQA submitted a comment letter on Proposed Interim Decision (PID) in 2021 as well as a comment letter on Amended PID in 2024. Status: EPA analyzing comments prior to issuing Interim Decision Comment period on Preliminary Work Plan (2014) Comment period on draft Risk Assessment (2019) Comment period on Proposed Interim Decision (2021) Comment period on Amended PID (May 6, 2024) EPA analyzes comments, issues Interim Decision Endangered Species Act (ESA) Consultation EPA issues Final Decision		
Next steps: EPA to issue Interim Decision.		
CASQA 10/6/2021 Comments to EPA	EPA Response	Did EPA incorporate CASQA’s comment?
CASQA Supports the Proposed Mitigation, Including Cancellation of All Oxyfluorfen Residential Products: To mitigate risks to both aquatic organisms and human health, EPA has proposed a number of substantial mitigation measures, including addition of runoff advisory language to all labels to mitigate chronic risks to aquatic wildlife, and a proposed cancellation of all residential oxyfluorfen products, principally to protect human health in residential settings. CASQA supports the proposed mitigation, including the cancellation of residential uses, covering all residential turf and ornamental products, as we expect such a cancellation will contribute to the reduction of oxyfluorfen present in urban runoff, thereby reducing ecological risks to aquatic invertebrates.	“CASQA supports the cancellation of application at residential use sites as it will contribute to the reduction of pesticides in runoff in urban watersheds thereby reducing risks to aquatic invertebrates.” (Amended PID, p.12) “The Agency has considered retaining residential application of oxyfluorfen by commercial applicators. However, it is not possible to preclude residential users from using products intended for professional applicators; therefore, residential uses will be removed from all products.” (Amended PID, p. 13)	Yes. CASQA submitted a comment letter in May 2024 —very similar to its 2021 letter—to further reinforce its support of the residential ban.

Appendix F

Mercury and PCBs Controls

Mercury and PCBs Control Measures – Update 2024



MEMBER AGENCIES:

Alameda
Albany
Berkeley
Dublin
Emeryville
Fremont
Hayward
Livermore
Newark
Oakland
Piedmont
Pleasanton
San Leandro
Union City
County of Alameda
Alameda County Flood
Control and Water
Conservation District
Zone 7 Water Agency

ALAMEDA COUNTYWIDE CLEAN WATER PROGRAM

MERCURY AND PCBS CONTROL MEASURES – UPDATE 2024

Report prepared by:

Alameda Countywide Clean Water Program

Submitted to:

California Regional Water Quality
Control Board, San Francisco Bay Region

August 2024

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Geosyntec Consultants contributed substantially to the writing and preparation of this report.

Preface

This *Mercury and PCBs Control Measures – Update 2024* report was prepared by the Alameda Countywide Clean Water Program (ACCWP) per the Municipal Regional Stormwater National Pollutant Discharge Elimination (NPDES) Permit (MRP; NPDES Permit No. CAS612008; Order No. R2-2022-0018) for urban stormwater issued by the San Francisco Bay Regional Water Quality Control Board. This report fulfills the requirements of MRP Provisions C.11.a.iii.(1), C.11.b.iii.(1), C.11.b.iii.(2), C.11.c.iii.(2), C.11.d.iii.(1), C.12.a.iii.(1), C.12.b.iii.(1), C.12.b.iii.(2), C.12.c.iii.(2), C.12.e.iii.(1), C.12.e.iii.(2), C.12.e.iii.(4), and C.12.g.iii.(3) for reporting on the mercury and polychlorinated biphenyls (PCBs) control measure implementation.

This report is submitted by ACCWP on behalf of the following Permittees:

- The cities of Alameda, Albany, Berkeley, Dublin, Emeryville, Fremont, Hayward, Livermore, Newark, Oakland, Piedmont, Pleasanton, San Leandro, and Union City;
- Alameda County;
- Alameda County Flood Control and Water Conservation District; and
- Zone 7 of the Alameda County Flood Control and Water Conservation District (Zone 7 Water Agency).

List of Acronyms

Acronym	Definition
ac	acre
ACCWP	Alameda Countywide Clean Water Program (also Program)
AMP	Alameda Municipal Power
BASMAA	Bay Area Stormwater Management Agencies Association
Bay	San Francisco Bay
BPJ	Best Professional Judgement
CMP	Control Measure Plan
EBMUD	East Bay Municipal Utility District
FCS	Full Capture System
FY	Fiscal Year
GIS	Geographic Information System
GSI	Green Stormwater Infrastructure
g/yr	grams per year
HHW	Household Hazardous Waste
kg	kilogram
mgd	million gallons per day
µg/kg	micrograms per kilogram
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
MRP	Municipal Regional Stormwater Permit
MS4	Municipal Separate Storm Sewer System
ng/L	nanograms per liter
NPDES	National Pollutant Discharge Elimination System
OFEE	Oil Filled Electrical Equipment
O&M	Operations and Maintenance
PCBs	Polychlorinated Biphenyls
POC	Pollutants of Concern
POTW	Publicly Owned Treatment Works
ppm	parts per million
ROW	Right-of-Way
SPCC	Spill Control and Countermeasure
SVP	Silicon Valley Power
TMDL	Total Maximum Daily Load
UCMR	Urban Creeks Monitoring Report
URDP	Urban Runoff Diversion Project
WY	Water Year

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1 Introduction

1.1 Purpose and Report Organization

1.2 Purpose

This *Mercury and PCBs Control Measures – Update 2024* report was prepared by the Alameda Countywide Clean Water Program (ACCWP or Program) per the Municipal Regional Stormwater Permit issued by the San Francisco Bay Regional Water Quality Control Board (Regional Water Board; Order No. R2-2022-0018). This report fulfills the requirements of MRP Provisions C.11.a.iii.(1), C.11.b.iii.(1), C.11.b.iii.(2), C.11.c.iii.(2), C.11.d.iii.(1), C.12.a.iii.(1), C.12.b.iii.(1), C.12.b.iii.(2), C.12.c.iii.(2), C.12.e.iii.(1), C.12.e.iii.(2), C.12.e.iii.(4), and C.12.g.iii.(3) for reporting on the mercury and polychlorinated biphenyls (PCBs) control measure implementation.

The following MRP reporting requirements are addressed within this report:

- In each Annual Report, Permittees shall submit documentation confirming that all control measures effectuated during the previous Permit term (i.e., MRP 2.0) for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction. (C.11.a/C.12.a)
- In each of the 2022 through 2026 Annual Reports, Permittees shall report progress on the acreage of land areas investigated, including progress toward investigation of 100 percent of the old industrial land use area listed in the MRP. The reporting shall indicate what action was taken for the parcels investigated (e.g., abatement, referral, enforcement, etc.). Permittees shall submit all supporting data and information including referral reports. (C.11.b/C.12.b)
- Permittees shall report annually on ongoing enhanced operations and maintenance (O&M) activities associated with all past contaminated property referrals. (C.11.b/C.12.b)
- Beginning in 2023, in each Annual Report Permittees shall submit an account of control measure implementation consistent with the Old Industrial Control Measure Plan submitted in March 2023 and any modifications thereto. Reporting shall include maps of the areas treated, the acreage of catchments addressed, and a description of all control measures, installed treatment devices, and routing facilities for each treated catchment. (C.11.c/C.12.c)
- Permittees shall submit in their 2024 Annual Report a summary of municipally owned electrical utilities' plans to maintain and upgrade PCBs-containing oil filled electrical equipment (OFEE). (C.12.e)

- Permittees shall submit in every Annual Report, beginning with the 2023 report, a summary of the actions undertaken during that reporting year that remove municipally owned PCBs-containing OFEE along with the loads avoided and the details of the calculations and assumptions used to estimate the load reduced. (C.12.e)
- Beginning with their 2023 Annual Report, the Permittees shall provide each of the following items (C.12.g):
 - The number of applicable structures that applied for a demolition permit during the reporting year.
 - A running list of the applicable structures that applied for a demolition permit since July 1, 2019, the number of samples each structure collected, and the concentration of PCBs in each sample.
 - For each applicable structure, with PCBs concentrations of 50 mg/kg or greater, include the following: the project address, the demolition date, and a brief description of the PCBs-containing materials.
 - For each structure that was constructed or remodeled between the years 1950 and 1980 and requires emergency demolition to protect public health and/or safety, provide the following: address, date building was constructed, and date of demolition.
- In each of the 2023 through 2026 Annual Reports, Permittees shall report on efforts to promote recycling of mercury-containing products and efforts to increase effectiveness of these recycling efforts. Permittees shall also report on the mass of mercury-containing material collected throughout the region along with an estimate of the mass of mercury contained in recycled material using the methodology contained in the load reduction accounting system. (C.11.d)

This report is organized as follows:

1. Introduction – Section 1 describes the purpose of the report and provides background on the PCBs and mercury Total Maximum Daily Loads (TMDLs) and the current municipal regional stormwater permit (i.e., MRP 3.0).
2. Assess Load Reductions from MRP 2.0 - Section 2 provides documentation confirming that the control measures implemented during MRP 2.0 for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction.

3. Control Measures – A section is provided for each of the control measures that are being implemented by the Permittees during this permit term to control PCBs and mercury.

1.3 Background

1.3.1 Mercury and PCBs Total Maximum Daily Loads

Fish tissue monitoring in San Francisco Bay (Bay) has revealed bioaccumulation of PCBs, mercury, and other pollutants. The levels found are thought to pose a health risk to people consuming fish caught in the Bay. As a result of these findings, California has issued an interim advisory on the consumption of fish from the Bay. The advisory led to the Bay being designated as an impaired water body on the Clean Water Act "Section 303(d) list" due to PCBs, mercury, and other pollutants. In response, the Regional Water Board has developed TMDL water quality restoration programs targeting PCBs and mercury in the Bay. The general goals of the TMDLs are to identify sources of PCBs and mercury to the Bay and implement actions to control the sources and restore water quality.

Municipal separate storm sewer systems (MS4s) are one of the PCBs and mercury source/pathways identified in the TMDL plans. Local public agencies (i.e., Permittees) subject to requirements via NPDES permits are required to implement control measures in an attempt to reduce PCBs and mercury from entering stormwater runoff and the Bay. These control measures, also referred to as BMPs, are the tools that Permittees can use to assist in restoring water quality in the Bay.

1.3.2 Municipal Regional Permit

NPDES permit requirements for Phase I municipal stormwater programs and Permittees in the Bay Area are included in the MRP, which was issued to 70 cities, counties, and flood control districts in 2009 and initially reissued in 2015. The current MRP (i.e., MRP 3.0; Order No. R2-2022-0018) became effective on July 1, 2022. MRP 3.0 was amended in October 2023 (Order No. R2-2023-0019); this amendment did not affect Provisions C.11 and C.12.

Consistent with the TMDL plans, Provisions C.11. and C.12 of the MRP require the implementation of control programs, including source and treatment control measures and pollution prevention strategies, to reduce mercury and PCBs in urban stormwater runoff. The following sections describe the elements of the control programs and report on their implementation by the Alameda Permittees.

2 Assess Load Reductions from Stormwater (C.11.a/C.12.a)

2.1 Description

The Permittees must implement an assessment methodology and data collection program to quantify, in a technically sound manner, mercury and PCBs loads reduced through implementation of pollution prevention, source control, and treatment control; green stormwater infrastructure; and other measures taken as part of the mercury and PCBs control programs. The load reduction accounting system is described in the *Source Control Load Reduction Accounting for Reasonable Assurance Analysis* report (Bay Area Stormwater Management Agencies Association (BASMAA) 2022). This accounting system describes calculation methodologies, data requirements, and model parameters used to quantify the load reduction for each type of control measure. The Permittees will use the assessment methodology to demonstrate the load reductions achieved during MRP 3.0 as well as progress toward achieving the mercury and PCBs TMDL wasteload allocations. The loads reduced during the permit term will be reported in the 2026 Annual Report.

This annual report provides documentation confirming that the control measures implemented during MRP 2.0 for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction.

2.2 Control Measures Implemented during MRP 2.0 with Load Reductions

Table 2-1 lists the PCBs load reductions credited for each control measure implemented from Fiscal Year (FY) 2013/14 through FY 2021/22 (i.e., during MRP 2.0). Table 2-2 lists the mercury load reduction credited during MRP 2.0, as reported in the *ACCWP Mercury and PCBs Watershed/Management Areas, Control Measures, and Load Reduction – Update 2022 report* (ACCWP 2022).

Table 2-1: PCBs Loads Reduced Within Alameda County (FY 2013/14 through FY 2021/22)

Control Measure Category	PCBs Load Reduced (g/yr)
Source Property Identification and Abatement	234.91
Green Stormwater Infrastructure and Treatment	62.13
Full Trash Capture Devices	27.92
Enhanced O&M	8.70
Manage PCBs in Building Materials	626.67
Diversion to POTW	7.78
TOTAL - All Control Measures	968.1

Table 2-2: Mercury Loads Reduced Within Alameda County (FY 2013/14 through FY 2021/22)

Control Measure Category	Mercury Load Reduced (g/yr)
Source Property Identification and Abatement	63.17
Green Stormwater Infrastructure and Treatment	733.19
Large Full Trash Capture Devices	230.61
Enhanced O&M	76.47
Diversions to POTW	18.47
TOTAL - All Control Measures	1,122

The sections below discuss the control measures implemented during MRP 2.0 for which load reduction credit was recognized

2.2.1 Source Property Identification and Abatement

The source property identification and abatement program implemented during MRP 2.0 involved investigations of properties located in historically industrial land use or other land use areas where PCBs were used, released, and/or disposed of and where sediment concentrations have been found at levels significantly above urban background levels. The source property identification and abatement control measure began with performing investigations of these “High Likelihood” areas to identify PCBs sources to the municipal storm drain system. The Permittees validated the existence of significantly elevated PCBs concentrations through surface soil/sediment sampling in the right-of-way or stormwater sampling in the storm drain system where visual inspections and/or other information suggested that a specific property was a potential source of significantly elevated PCBs concentrations. Where data confirmed significantly elevated PCBs concentrations (e.g., a sediment concentration equal to or greater than 1.0 mg/kg or a concentration greater than 0.5 mg/kg plus other lines of evidence) were present in soil/sediment from a potential source property or in stormwater samples, the Permittees took actions to cause the property to be abated or referred that property to the Regional Water Board to facilitate the issuance of orders for further investigation and remediation of the subject property.

For each confirmed source property, the Permittee implemented or caused to be implemented one or a combination of interim enhanced O&M measures in the street or storm drain infrastructure adjacent to the source property during the source property abatement process to prevent further contaminated sediment from entering the storm drain. Documentation of the ongoing enhanced O&M measures at the referred properties that have not been abated is provided in Section 3.2.

For those source properties that were self-abated (i.e., by the Permittee or the property owner), the Permittee provided the Regional Water Board with sufficient documentation that source property abatement had effectively eliminated the transport of PCBs or mercury offsite and from

entering the MS4 infrastructure for all transport mechanisms that apply to the site (e.g., stormwater runoff, wind, vehicle tracking).

As required by MRP 3.0 Provisions C.11.b and C.12.b, the source property investigation program is ongoing. See Section 3.2 for further information.

2.2.2 Green Stormwater Infrastructure and Treatment

This control measure included new development and redevelopment projects on private and public properties regulated by MRP Provision C.3, as well as retrofit of existing infrastructure in public right-of-way (ROW) areas and on public properties that are not Provision C.3 Regulated Projects. Permittees tracked and accounted for implemented C.3. projects and public retrofit green stormwater infrastructure (GSI) projects over the MRP 2.0 permit term.

New development, redevelopment, and GSI retrofit projects continue to be tracked by the Alameda Permittees in their ArcGIS Online database. Refer to the Provision C.3 section of the *ACCWP Fiscal Year 2023/24 Annual Report* for further information.

2.2.3 Large Full Trash Capture Systems

Permittees installed full capture systems (large and inlet-based) in response to the trash control requirements of MRP Provision C.10. These devices capture sediments that may be contaminated with mercury and PCBs. Permittee are continuing to install full capture systems during the current permit term. The existing and new devices are routinely maintained per the requirements of MRP Provision C.10. Refer to the Provision C.10 section of the *ACCWP Fiscal Year 2023/24 Annual Report* for further information.

2.2.4 Enhanced Operations and Maintenance

As stated above, many Permittees installed inlet-based full trash capture devices in response to the trash control requirements of MRP Provision C.10. These inlets are typically cleaned more frequently as a result of the installation of the full trash capture device. Therefore, the Permittees conducted an enhanced O&M activity for each of these inlets. New inlet-based devices continue to be installed to comply with MRP Provision C.10. The inlet-based full trash capture devices are routinely maintained per the requirements of MRP Provision C.10.

2.2.5 Manage PCBs in Building Materials

MRP 2.0 Provision C.12.g. required Permittees to develop and implement a protocol for managing materials with PCBs concentrations of 50 parts per million or greater in applicable structures at the time such structures undergo demolition, so that PCBs do not enter municipal storm drain systems. A Permittee was exempt from this requirement if it provided evidence in its

FY 2016/17 Annual Report that the only buildings that existed pre-1980 within its jurisdiction were single-family residential and/or wood-frame buildings.

Alameda Permittees were required to develop a protocol by June 30, 2019 that included each of the following components:

- The necessary authority to ensure that PCBs do not enter municipal storm drains from PCBs-containing materials in applicable structures at the time such structures undergo demolition,
- A method for identifying applicable structures prior to their demolition, and
- Method(s) for ensuring PCBs are not discharged to the municipal storm drain from demolition of applicable structures.

By July 1, 2019 and thereafter, Permittees were required to:

- Implement or cause to be implemented the PCBs management protocol for ensuring PCBs are not discharged to municipal storm drains from demolition of applicable structures via vehicle track-out, airborne releases, soil erosion, or stormwater runoff; and
- Develop an assessment methodology and data collection program to quantify in a technically sound manner PCBs loads reduced through implementation of the protocol for controlling PCBs during demolition of applicable structures.

BASMAA completed a regional project in March 2019 that developed a framework for local programs to manage PCBs-containing materials during building demolition. The assistance included model ordinance language, guidance materials, tools, training materials, and outreach. Alameda Permittees began implementing the program on July 1, 2019 (BASMAA 2019). Building demolition data from Permittees with applicable structures are reported annually in the ACCWP's Annual Report.

Implementation of the program to manage PCBs in building materials during demolition is ongoing, as required by MRP 3.0. See Section 6 for further information.

2.2.6 Diversion to POTW

This control measure consists of diverting dry weather and/or first flush events from MS4s to publicly owned treatment works (POTWs) as a method to reduce loads of PCBs and mercury in urban runoff.

The Alameda County Flood Control and Water Conservation District has executed an agreement with the East Bay Municipal Utility District (EBMUD) for the operation of an Urban Runoff Diversion Project (URDP) at the Ettie Street Pump Station to direct dry weather discharge to EBMUD's main wastewater treatment plant for treatment. The URDP is designed to divert up to 0.5 million gallons per day (mgd) of dry-weather flow during the dry season (i.e., approximately April 16th through November 30th). EBMUD completed the installation of its pump and control system and new 6-inch diameter conveyance pipe in 2016; implementation is ongoing. Alameda County Flood Control and Water Conservation District staff coordinate with EBMUD staff to ensure proper operation and maintenance of the diversion pump.

3 Program for Source Property Identification and Abatement (C.11.b/C.12.b)

3.1 Description

MRP Provisions C.11.b and C.12.b require the Alameda Permittees to investigate land areas that are likely to contribute mercury and PCBs to MS4s. These investigations focus on land areas where industrial activities occurred prior to 1980 and continue today (i.e., old industrial land use areas). Alameda Permittees must investigate 2,620 acres during the MRP 3.0 permit term.

For those properties or land areas found to be contributing substantial amounts of mercury or PCBs or where high mercury or PCBs concentrations are found (generally areas with mercury or PCBs sediment concentrations greater than 0.5 mg/kg), Permittees must take actions to abate the mercury or PCBs source property or refer the property to the Regional Water Board for follow-up measures. For each source property referred to the Regional Water Board, Permittees should implement interim enhanced O&M measures in the street or storm drain infrastructure adjacent to the referred source property or implement a stormwater treatment system downstream of the property. These enhanced O&M measures must intercept historically deposited contaminated sediment in the vicinity of the source property and prevent further contaminated sediment from being discharged to the storm drain system.

3.2 Implementation

3.2.1 Source Area Investigation

This section reports the progress towards investigating 2,620 acres of old industrial area this permit term and actions taken for identified source properties including supporting data and referral reports, if any.

Sediment/Soil Sampling

As described in the WY 2023 UCMR (ACCWP 2024) Appendix A.3, *Pollutants of Concern Monitoring Report*, prior to WY 2021, the Program's Pollutants of Concern (POCs)-related monitoring had largely relied upon a targeted sampling design that collected soils associated with individual parcels in the public ROW as a means of identifying potential source properties. This sampling design is limited in the number of samples that can be feasibly collected and analyzed each year, which limits the geographic scope of the assessment efforts. The ACCWP identified and tested a variety of catchment-scale sampling techniques to test out their utility for identifying important source properties in larger catchment areas beginning in WY 2021. The goal of these efforts was to allow segregation of catchment areas of interest into two categories: (1) those that are potentially important contributors of POCs and require additional characterization efforts, or (2) those that are unlikely to be important contributors and can be excluded from future

monitoring efforts. Comparison of compositing techniques employed in WY 2021 and WY 2022 indicated that use of a compositing scheme that incorporates targeted sampling at all identified potential source properties within a given area was the most effective design based upon the ability to differentiate between areas of lower and higher pollutant concentrations in a cost- and time-efficient manner.

The Program’s sampling efforts in FY 2023-24 applied the same catchment-scale compositing scheme. The Program conducted urban sediment/soil sampling to identify potential sources of PCBs and mercury in August and September 2023 and May and June 2024. WY 2023 efforts (i.e., August and September 2023) were designed to both follow up on the elevated PCBs concentrations observed in WY 2022 and expand the use of the targeted composite sampling scheme to previously unsampled areas of interest. To that end, four new zones in downtown Oakland were investigated in addition to the finer-scale sampling conducted in the two-block area associated with the elevated PCBs near Jack London Square. This sampling assessed 105.4 acres of old industrial area. Details are provided in the *Pollutants of Concern Monitoring Report* in the WY2023 UCMR (ACCWP 2024). In May and June 2024 (i.e., WY 2024), the ACCWP collected 18 composite samples in the Emeryville Crescent watershed and 26 composite samples in the San Leandro Bay watershed, assessing 1,033.8 acres of old industrial area.

Total Area Investigated

Table 3-1 below summarizes the total old industrial area investigated during this permit term.

Table 3-1: Total Old Industrial Area Investigated

Fiscal Year	Old Industrial Area Investigated
FY 2022/23	483.3
FY 2023/24	1,139.2
Required during Permit Term	2,620
Area Remaining to be Investigated in MRP 3.0	1,622.5

3.2.2 Enhanced O&M Activities

This section reports ongoing enhanced O&M activities associated with source property referrals. The properties that were referred to the Regional Water Board during MRP 2.0, their abatement status, and enhanced O&M BMPs are listed in Table 3-2 below.

Table 3-2: ACCWP Contaminated Sites Referred to the Regional Water Board

SITE NAME	LOCATION	YEAR REFERRED	ABATEMENT STATUS	ENHANCED O&M
AMG	3438 Helen Street, Oakland	2018	Abated	Site is fully abated (per Regional Water Board letter dated, July 18, 2023)
Custom Alloy Scrap Sales	2601 Peralta St., Oakland	2018	Referred	Onsite controls, street sweeping in ROW, and Filterra treatment in ROW
Precision Cast Products	1549 32nd Street and 2868 Hannah Street, Oakland	2018	Abated	Site is fully abated (per Regional Water Board letter dated, July 18, 2023)
UPRR – Oakland Coliseum	700 73rd Avenue, Oakland	2018	Abated	Site has been capped as part of the ongoing remediation
Schnitzer Steel	1101 Embarcadero West, Oakland	2020	Referred	Onsite controls, wheel wash at site entrance, enhanced street sweeping conducted by Schnitzer. Inlet protection on Embarcadero W. at Market
Brownfield Auto Auction (former Nor-Cal Rock)	768 46 th Avenue, Oakland	2020	Referred	Direct discharge to creek; no opportunity for enhanced O&M
Economy Lumber	750 High Street, Oakland	2020	Referred	Direct discharge to creek; no opportunity for enhanced O&M

Enhanced O&M activities listed for the referred source properties that have not been abated are ongoing.

4 Control Measure Implementation in Old Industrial Areas (C.11.c/C.12.c)

4.1 Description

MRP Provisions C.11.c and C.12.c require the Permittees, within the permit term, to implement or cause to be implemented control measures (i.e., treatment controls, diversion to wastewater treatment plants, GSI implemented in compliance with Provision C.3.b, enhanced operation and maintenance controls, or other controls) to achieve mercury and PCBs load reductions. The Alameda County Permittees must implement control measures on 664 acres of old industrial land use areas that have not been redeveloped or treated with GSI or other treatment controls by June 30, 2027.

Implementation of treatment control measures on 664 acres would result in a total estimated load reduction of about 28 grams per year (g/yr) of mercury and 121 g/yr of PCBs (assuming a 70% pollutant removal efficiency). Implementation of control measures with a lower efficiency than 70 percent will result in reduced area credited (for those lower efficiency control measures) toward fulfillment of the total treatment area requirement. Permittees may comply with this provision either by implementing control measures on old industrial land use areas or by accounting for the load reduction of mercury and PCBs (28 g/yr and 121 g/yr, respectively). The area credited will be proportional to the ratio of the implemented control measure efficiency relative to the efficiency of treatment controls.

Implementation of control measures in PCBs-contaminated catchments not designated as old industrial may count toward fulfillment of the required treatment area. In choosing locations for control measures, this plan focuses on catchments containing known or suspected source areas or evidence of moderate to high mercury or PCBs soil concentrations (generally soil/sediment concentrations greater than 0.3 mg mercury/kg or 0.2 mg PCBs/kg).

Treatment control systems must be designed and sized consistent with MRP Provision C.3.d (Numeric Sizing Criteria for Stormwater Treatment Systems). The Regional Water Board will consider the use of conditionally approved treatment control system sizing criteria, per MRP Provision C.3.j(3)(b), provided an analysis of the effectiveness of the facility sized according to these alternative criteria is acceptable to the Regional Water Board Executive Officer.

Permittees may choose to implement diversions to publicly owned treatment plants (POTWs) to address this requirement. Because of the higher removal efficiency of wastewater treatment, each acre addressed by routing stormwater to a POTW will be credited as 1.3 acres toward satisfying the old industrial area treatment requirement, provided that the POTW captures and treats the stormwater design storm identified in MRP Provision C.3.d.

4.2 Implementation

The Program submitted the Alameda County Old Industrial Area Control Measure Plan (CMP) on March 31, 2023. The plan includes schedules for implementing control measures in old industrial areas to address mercury and PCBs load reduction requirements included in MRP Provisions C.11.c and C.12.c. and includes maps of the areas where control measures will be implemented, the size of the treated catchments, and a description of design and sizing features for the selected control measures. The ACCWP revised the March 2023 CMP to address Water Board comments received in August 2023. The Revised CMP was submitted to the Water Board on March 31, 2024.

4.2.1 Process for Selecting and Implementing Specific Treatment Control Measures

Focus Areas

For the 2024 Old Industrial Area CMP, the ACCWP analyzed existing monitoring data to identify known or suspected areas with moderate or high concentrations of mercury or PCBs. These areas are located in the cities of Berkeley, Emeryville, Hayward, Oakland, and San Leandro. There are 284.2 acres within parcels and ROW the selected high priority focus areas. The Emeryville Crescent and San Leandro Bay watersheds are known areas of concern and also are targeted for investigation. Additional focus areas will be assessed for specific treatment control measures as monitoring conducted for C.11.b/C.12.b (see Section 3) identifies additional moderate areas.

The process used to select and implement specific control measures for each focus area consists of the following:

1. The ACCWP will resample the focus areas to confirm the presence of moderate or elevated levels of mercury or PCBs. If resampling finds an area to not be moderately contaminated (i.e., PCBs $\leq$ 0.2 mg/kg), the focus area map will be revised to indicate the result of the monitoring. The revised maps will be included in the annual report.
2. If there is a confirmed source property (i.e., PCBs $\geq$ 1 mg/kg), the permittee will refer the property to the Water Board and implement enhanced O&M measures at the site. Alternatively, permittees may abate or cause the property to be abated directly. Source properties will be referred as they are identified throughout the permit term unless the permittee causes abatement of the property.
3. For target areas where elevated levels of PCBs are confirmed, the ACCWP or permittee will conduct site visits within the focus area to determine if there is a readily identifiable source.
4. If no specific source property is identified, but a property that is a source of moderate contamination (i.e., PCBs $\geq$ 0.2 mg/kg) is located, the permittee will assess whether the property owner can implement actions on the property to contain or treat the source.

The permittee will take action to cause the containment or treatment to be implemented by the property owner at or around the site.

5. If no specific property is identified as a source of moderate contamination, the ACCWP and permittee will select and implement controls for the moderate area in the ROW (i.e., treatment or enhanced operations and maintenance) based on site constraints, local infrastructure, and drainage patterns.

In May and June 2024, the ACCWP resampled known moderate locations to confirm the presence of moderate or elevated levels of mercury or PCBs. Fifty-eight locations were revisited through this effort. Forty-seven of these locations are represented in 20 single-point or composite samples. The remaining locations were unable to be sampled due to redevelopment, access issues, or a lack of soil present in the ROW. Analytical results are expected in September 2024.

4.2.2 Treatment Controls

This section describes the treatment control measures that were implemented during this permit term (i.e., since July 1, 2022) to control mercury and PCBs in urban runoff from old industrial areas, areas containing known or suspected source areas, or areas with evidence of moderate to high mercury or PCBs soil concentrations. Potential treatment control measures include retrofit with GSI or non-GSI treatment control, enhanced operation and maintenance (O&M) practices, redevelopment with GSI, full trash capture devices, and diversion to POTW. The process for selecting treatment control measures is described in the CMP.

Figures 3-1 through 3-15 (provided at the end of this report) show PCBs and mercury sample concentrations in monitoring data collected through WY 2023, untreated old industrial land use areas, and old industrial areas that were treated prior to FY 2020/21. These maps also show the locations and drainage catchments of old industrial area treatment measures installed in FY 2021/22 and treatment control measures installed during this permit term (i.e., since July 1, 2022). The old industrial area indicated on these maps is based on mapping conducted over the previous two permit terms. The maps will be updated throughout the permit term to improve the accuracy of the maps at the parcel scale and to add new monitoring data.

Retrofit with Treatment Controls or Green Stormwater Infrastructure

Retrofit projects provide treatment control for existing developed areas without redeveloping the tributary area. Treatment controls may include GSI or non-GSI treatment.

Retrofit treatment control measures will be designed and sized consistent with MRP Provision C.3.d (Numeric Sizing Criteria for Stormwater Treatment Systems). Non-regulated retrofit projects with significantly constrained area or other substantial constraints will size treatment control measures using the *Guidance for Sizing Green Infrastructure Facilities in Streets Projects*

(BASMAA 2019) with companion analysis *Green Infrastructure Facility Sizing for Non-Regulated Street Projects* (BASMAA 2017). These projects will comply with the Regional Water Board’s conditional approval of that sizing method providing qualifiers and conditions under which alternative sizing criteria may be used for Non-Regulated green streets projects (SFBRWQCB, 2019). Retrofit projects that use the conditionally approved sizing criteria in MRP Provision C.3.j(3)(b) will provide an analysis to the Regional Water Board that determines the reduced effectiveness of the facility sized according to these alternative criteria.

Since July 1, 2022, 0.67 acres of old industrial and moderate parcels and ROW area were retrofit. In addition, 2.7 acres of old industrial area was retrofit in FY 2021/22. A list of the retrofit projects is provided in Table 4-1 below. These projects are illustrated in Figures 3-1 through 3-15.

Table 4-1: Old Industrial Area Treated by Retrofit Since July 1, 2022

Jurisdiction	Project Name	Catchment Area	Source Property Area Treated (acres)	Old Industrial Area Treated (acres)	Moderate Area Treated (acres)		
					Old Comm/Trans	Old Residential	New Urban
Alameda	Mitchell Avenue Northside Improvements	0.67	0	0.67	0	0	0

Notes: Control measure implementation data may be incomplete for FY2023/24 at the time this report was generated for the following Permittees: Oakland, Piedmont, and Union City.

Enhanced Operations and Maintenance

Routine MS4 O&M activities conducted by Permittees include street sweeping and drain inlet cleaning. In addition, storm drains, culverts, and channels are maintained as needed (i.e., desilted when needed to remove excessive quantities of accumulated sediment that may be causing localized flooding issues). Infrequent capital improvement projects may also remove accumulated sediment from the MS4, such as storm drain repairs or channel stabilization projects. Each of these O&M activities removes PCBs and mercury that are present in the sediment that is removed.

FY 2023/24, the City of Oakland flushed approximately 14,594 feet of storm drain lines in old industrial areas.

Redevelopment with Green Stormwater Infrastructure

GSI is treatment control that uses vegetation, soils, and natural processes to manage water and create healthier urban environments. GSI is used to reduce runoff volumes, disperse runoff to vegetated areas, harvest and use runoff where feasible, promote infiltration and evapotranspiration, and use bioretention and other natural treatment control systems to detain

and treat runoff before it reaches tributary creeks and, ultimately, San Francisco Bay. GSI treatment control measures include, for example, pervious pavement, infiltration basins, bioretention facilities, green roofs, and rainwater harvesting systems. Infiltration-based GSI treatment control measures are generally not recommended in areas with contaminated soils or groundwater.

Regulated redevelopment projects in old industrial and moderate areas are required to implement GSI by MRP Provision C.3. Redevelopment projects reduce mercury and PCBs loads both through the redevelopment activity (e.g., soil removal, capping, and addition or replacement of impervious surfaces) and the implementation of GSI treatment.

MRP Provision C.3.d includes numeric sizing criteria for GSI treatment measures for regulated redevelopment projects. The current 8th Edition of the *C.3 Technical Guidance Manual*, published in March 2023, provides guidance on the selection, sizing, and design of GSI treatment measures for redevelopment projects in Alameda County (ACCWP 2023b). MRP 3.0 includes several significant changes to Provision C.3, including changes to the types and sizes of projects regulated. Most of these changes go into effect on July 1, 2023. The redevelopment projects in old industrial and moderate areas listed in this plan will be sized and designed in accordance with this guidance.

Since July 1, 2022, 45 acres of old industrial parcels and ROW area were redeveloped. In addition, 47 acres of old industrial area redeveloped in FY 2021/22. A list of the redevelopment projects since July 1, 2022 is provided in Table 4-2 below. These projects are illustrated in Figures 3-1 through 3-15.

Table 4-2: Old Industrial and Moderate Area treated by Redevelopment Since 7/1/2022

Jurisdiction	Project Name	Project Address	Catchment Area	Old Industrial Area Treated (acres)
FY2022/23				
Alameda	Alameda Landing Public Waterfront Improvements	Mitchell Avenue at Fifth Street, Alameda	3.88	3.88
Berkeley	Berkeley Commons	600 Addison Street, Berkeley	8.46	8.46
Oakland	1067 Calcot Place	1067 Calcot Place, Oakland	1.24	1.24
FY2023/24				
Alameda	Alameda Landing Northern Waterfront Improvements – Mitchell Avenue Greenway Phase 2	North of Mitchell Avenue, east from Avenue A, Alameda	0.77	0.77
Alameda	Alameda Marina – Wrap A Phase	1777 Clement Avenue, Alameda	5.59	5.59
Fremont	Scannell Properties	40517 Albrae Street, Fremont	20.29	20.29

Notes: Control measure implementation data may be incomplete for FY23/24 at the time this report was generated for the following Permittees: Oakland, Piedmont, and Union City.

Full Trash Capture Treatment Control Measures

MRP Provision C.10 requires Permittees to implement trash prevention and control actions, including full capture systems (FCS), to reduce trash generation. Full capture systems capture sediment along with trash that may be contaminated with PCBs and mercury. Permittees have installed both large and inlet-based full capture systems in response to Provision C.10. Large full trash capture devices, including hydrodynamic separators (HDS), gross solids removal devices (GSRDs), and baffle boxes, capture and treat urban runoff from large drainage areas, ranging from 10's to 100's of acres. Inlet-based devices in roadways enhance the capture of sediments that may be contaminated with PCBs and mercury from smaller, localized drainage areas. In addition, these inlets are typically cleaned more frequently as a result of the installation of the full trash capture device. Full capture system implementation is described in each Permittee's Trash Load Reduction Plan. Full trash capture devices are sized and designed in compliance with MRP Provision C.10.

Alameda County Permittees treated 247.6 acres of old industrial parcels and ROW areas with large and inlet-based full trash capture systems since July 1, 2022. These projects are illustrated in Figures 3-1 through 3-15.

Table 4-3 below lists the area of each land use type that was treated with large FCS in FY 2022/23. Table 4-4 lists the area of each land use type that was treated with inlet-based FCS in FY 2022/23. Projects completed in FY 2021/22 are also listed.

Table 4-3: Large Full Capture System Treated Area

Land Use Category	Treatment Efficiency	PCBs Credit Ratio to Treatment Retrofit	FCS Area in FY21/22 (acres)	FCS Area since 7/1/2022 (acres)
Old Industrial	20%	0.29	0	11.1
Old Commercial ¹	20%	0.29	0	0
Old Residential ¹	20%	0.29	0	0
Old Transportation ¹	20%	0.29	0	0
New Urban ¹	20%	0.29	0	0

Notes: Control measure implementation data may be incomplete for FY2023/24 at the time this report was generated for the following Permittees: Berkeley, Oakland, Piedmont, and Union City.

¹ Old commercial, old residential, old transportation, and new urban areas associated with moderately contaminated areas.

Table 4-4: Inlet-Based Full Capture System Treated Area

Land Use Category	Treatment Efficiency	PCBs Credit Ratio to Treatment Retrofit	FCS Area in FY 2021/22 (acres)	FCS Area since 7/1/2022 (acres)
Source Property	18%	0.26	0	0
Old Industrial	18%	0.26	0	236.5
Old Commercial ¹	18%	0.26	0	0
Old Residential ¹	18%	0.26	0	0
Old Transportation ¹	18%	0.26	0	0

Land Use Category	Treatment Efficiency	PCBs Credit Ratio to Treatment Retrofit	FCS Area in FY 2021/22 (acres)	FCS Area since 7/1/2022 (acres)
New Urban ¹	18%	0.26	0	0

Notes: Control measure implementation data may be incomplete for FY2023/24 at the time this report was generated for the following Permittees: Berkeley, Oakland, Piedmont, and Union City.

¹ Old commercial, old residential, old transportation, and new urban areas associated with moderately contaminated areas.

City of Oakland FCS Device Implementation

Future FCS device implementation by Permittees will further treat old industrial and moderate areas. For example, the City of Oakland plans to install approximately 350 catch basin insert FCS devices in locations that generate very high, high, or moderate levels of trash, using local Measure Q funding. The City plans to install the devices by June 30, 2025. The installation locations will be prioritized based on trash load reduction benefit and additional factors such as potential load reductions for mercury and PCBs.

The City of Oakland will also install approximately:

- 80 CPS units as part of the Active Transportation Program
- 250 CPS as part of the Sewer Rehabilitation Program.

These devices are also expected to be installed by June 30, 2025.

Finally, the City plans to install approximately 1,200 CPS units in very high, high, or moderate trash generating areas that are receiving paving rehabilitation as part of the City's Paving Program. The current plan is to install these devices by June 30, 2026. Many of these devices will be installed in areas with moderate or high PCB loads.

5 Program for Controlling PCBs from Electrical Utilities (C.12.e)

5.1 Description

Provision C.12.e requires Permittees to develop and implement a program to manage PCBs in oil-filled electrical equipment (OFEE¹). Requirements include: (1) develop or improve and implement standard operating procedures (SOPs) to respond to, clean up, and report spills and releases from municipally owned OFEE; (2) develop and implement a plan to maintain and upgrade municipal

¹ Oil-filled electrical equipment (OFEE) includes electrical equipment that has an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Examples include transformers, circuit breakers, and electrical switches.

owned OFEE; (3) document PCBs loads avoided through existing and ongoing OFEE removal and replacement programs; and (4) collaborate with the Regional Water Board to request information from non-municipally owned electrical utilities.

5.2 Implementation

5.2.1 Enhanced Spill Response and Reporting Requirements

To assist the Permittees with complying with Provision C.12.e, the Program and the City of Alameda participated in a BAMSC workgroup to collaboratively develop an Enhanced Spill Response and Reporting Requirements addendum. The addendum describes improved spill response and reporting practices that will be implemented by the municipally owned electrical utilities that currently operate within the MRP-area:

- Alameda Municipal Power (AMP), Alameda CA
- City of Palo Alto Utilities Department, Palo Alto CA
- Pittsburg Power Company dba Island Energy, Pittsburg CA
- Silicon Valley Power (SVP), Santa Clara CA

The improved spill response and reporting practices (provided in the Fiscal Year 2022-23 Annual Report) is being implemented in addition to the actions described in the spill response SOPs and Spill Prevention Control and Countermeasure (SPCC) Plans that each of the above municipally owned electrical utilities follow. In all cases, the actions described in the addendum are in addition to any local, state, and/or federal requirements described in existing SOPs/SPCCs.

5.2.2 Plan to Maintain and Upgrade OFEE

AMP continues to maintain and upgrade its OFEE. Electrical equipment is taken out of service when it's damaged, leaking, or upgraded. When this equipment is taken out of service, it is brought to the Central Substation and placed in a contained and bermed area. AMP tests all OFEE, both pad-mounted and pole-mounted, when it is removed from the field. An oil sample is taken from each piece of equipment and sent for laboratory analysis for PCBs. If the equipment is found with PCBs oil at concentrations ≥ 5 ppm, it is shipped out of state within six months for proper disposal. The Compliance Superintendent is responsible for overseeing removal and shipping of this equipment. AMPs' Stormwater Pollution Prevention Plan, updated July 3, 2023, is provided in **Appendix A**.

5.2.3 PCBs Loads Avoided

The Program assisted the City of Alameda with estimating PCBs loads avoided resulting from the removal of municipally owned PCBs-containing OFEE through maintenance programs and system

upgrades for the period 2002 to the beginning of this permit term (July 1, 2022), as well as actions undertaken during this permit term. Documentation of the loads avoided, details of the calculations, and assumptions used to estimate the load reduced are provided in **Appendix B**.

6 Manage PCBs-Containing Materials and Wastes During Building Demolition Activities

6.1 Description

Provision C.12.g requires that Permittees implement the established protocol for managing PCBs-containing building materials prior to issuing a demolition permit. Permittees shall enhance their construction site control program to minimize migration of PCBs into the MS4 from applicable structures containing building materials with PCBs concentrations of 50 ppm or greater during demolition activities. Permittees shall ensure construction sites are inspected during demolition during the rainy season and obtain verification that materials from demolished buildings are appropriately disposed. A Permittee is exempt from this requirement if it provided evidence acceptable to the Regional Water Board Executive Officer in its FY 2022/23 Annual Report that the only buildings that existed pre-1980 within its jurisdiction were single-family residential and/or wood-frame buildings.

6.2 Implementation

Appendix C (*PCBs in Building Materials Management Program – Fiscal Year 2023/24 Data Summary*) documents the following permit-required reporting:

- The number of applicable structures that applied for a demolition permit during the reporting year.
- A running list of the applicable structures that applied for a demolition permit since July 1, 2019; the number of samples each structure collected; and the concentration of PCBs in each sample.
- For each applicable structure with PCBs concentrations ≥ 50 ppm, provide the project address, the demolition date, and a brief description of the PCBs-containing materials.
- For each structure that was constructed or remodeled between the years 1950 and 1980 and requires emergency demolition to protect public health and/or safety, provide the address, the date building was constructed, and the date of demolition.

7 Mercury Collection and Recycling Implemented Throughout the Region

7.1 Description

Provision C.11.d requires Permittees to promote, facilitate, and/or participate in collection and recycling of mercury-containing consumer products, devices, and equipment and make efforts to increase effectiveness of recycling efforts throughout the region.

Mercury load avoidance and reduction includes a number of source control measures listed in the California Mercury Reduction Act adopted by the State of California in 2001. These source controls include material bans, reductions of the amount of mercury allowable for use in products, and mercury device recycling. The following source controls bans are included:

- Sale of cars that have light switches containing mercury;
- Sale or distribution of fever thermometers containing mercury without a prescription;
- Sale of mercury thermostats; and
- Manufacturing, sale, or distribution of mercury-added novelty items.

In addition, fluorescent lamps manufacturers continue to reduce the amount of mercury in lamps sold in the U.S. Manufacturers have significantly reduced the amount of mercury in fluorescent linear tube lamps.

Mercury Device Recycling Programs resulting in mercury load reduction generally include three types of programs that promote and facilitate the collection and recycling of mercury-containing devices and products:

- Permittee-managed household hazardous waste (HHW) drop-off facilities and curbside or door-to-door pickup;
- Private business take-back and recycling programs (e.g., Home Depot); and
- Private waste management services for small and large businesses.

7.2 Implementation

7.2.1 Promotion of Mercury Recycling

The Program coordinates with Permittees and local household hazardous waste (HHW) collection facilities to implement mercury collection and recycling in accordance with MRP Provision C.11.d. Alameda County offers multiple free, convenient options for Alameda County residents to

dispose of their HHW properly and safely, including mercury devices. Specialized services are also provided to qualifying small businesses and residential landlords.

Recycling services are promoted by StopWaste, a public agency governed by the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council. StopWaste helps Alameda County's businesses, residents, and schools waste less, recycle properly, and use water, energy, and other resources efficiently (<https://www.stopwaste.org/at-home/household-hazardous-waste>). The StopWaste website provides information on how to properly dispose of mercury-containing wastes such as light bulbs and thermostats. The site also links to EPA guidance on how to cleanup spills from broken mercury-containing bulbs and thermometers. The StopWaste RE:source website provides guidance for reuse, repair, recycling, and safe disposal for Alameda County, Contra Costa County, and the City of Palo Alto (<https://resource.stopwaste.org/>). RE:source is also available as an application for smart phones.

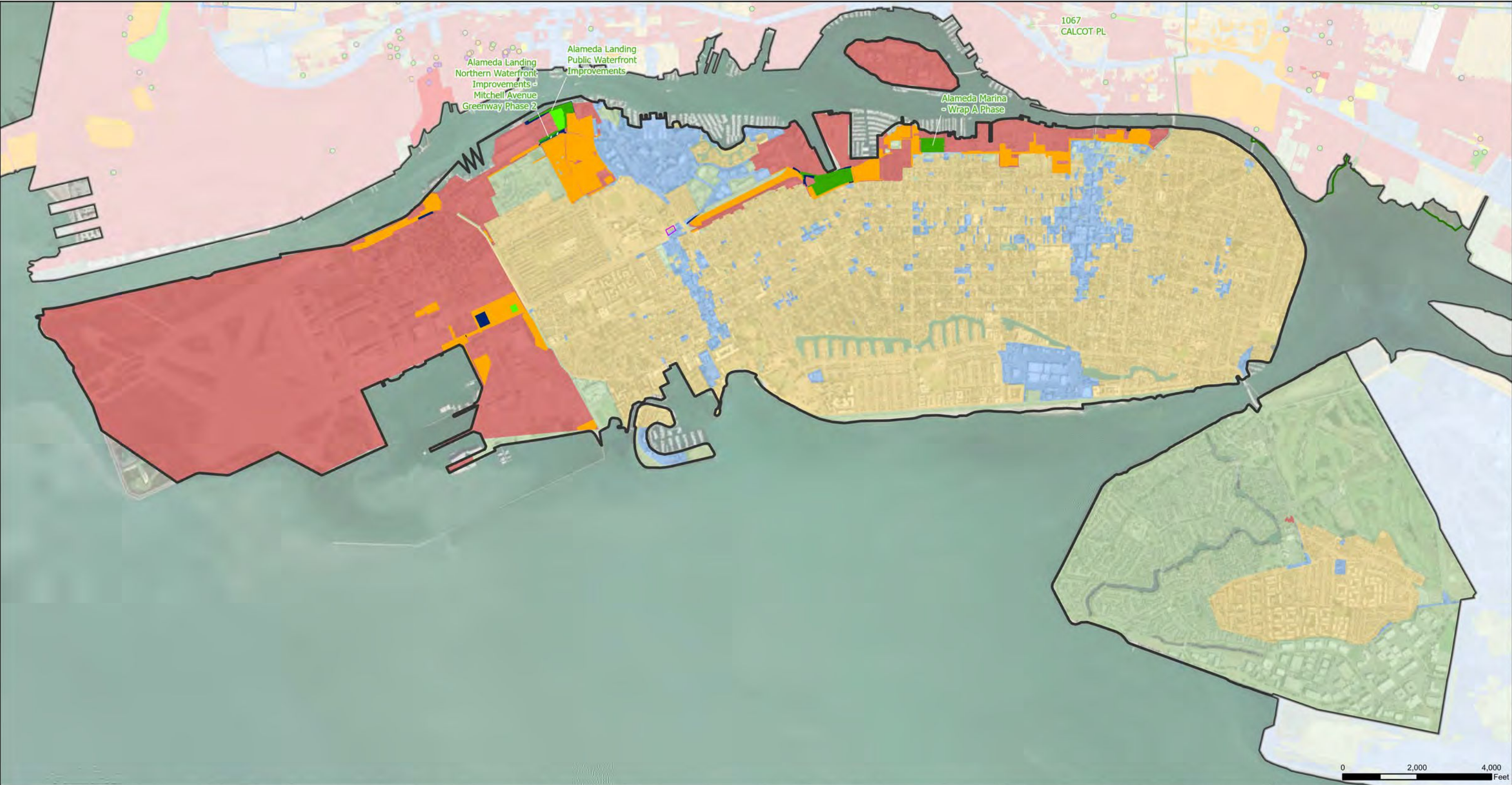
7.2.2 Mass of Mercury Collected

The Program assisted the Permittees with estimating the mass of mercury-containing material collected in Alameda County and an estimate of the mass of mercury contained in recycled material using the methodology contained in load reduction accounting system described and cited in the MRP 3.0 Fact Sheet (provided in **Appendix D**).

8 References

- Alameda Clean Water Program (ACCWP), 2022. Mercury and PCBs Watershed/Management Areas, Control Measures, and Load Reduction – Update 2022. August 29, 2022.
- ACCWP, 2023. C.3 Stormwater Technical Guidance. A Handbook for Developers, Builders, and Project Applicants. Version 8. March 22, 2023.
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- Bay Area Stormwater Management Agencies Association (BASMAA), 2017. Green Infrastructure Facility Sizing for Non-Regulated Street Projects. Prepared by Dubin Environmental for BASMAA. December 13, 2017.
- BASMAA, 2018. PCBs in Priority Building Materials: Model Screening Assessment Applicant Package. Managing PCBs-Containing Building Materials during Demolition: Guidance, Tools, Outreach and Training. August. Revised November 2109 and May 2023
- BASMAA, 2019. Guidance for Sizing Green Infrastructure Facilities in Street Projects. Prepared by Dan Cloak Environmental Consulting and EOA, Inc. for BASMAA. June 2019.
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FIGURES



City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Drainage Area Boundaries After 6/30/2022

Small FTC Projects within OIB^c

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Sediment Samples (through WY 2023)

<0.2 mg/kg PCBs & <0.3 mg/kg Hg

<0.2 mg/kg PCBs & >0.3 mg/kg Hg

0.2 - 1.0 mg/kg PCBs

>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Alameda

Projects Treating Old Industrial and Moderate Area

Figure 3-1

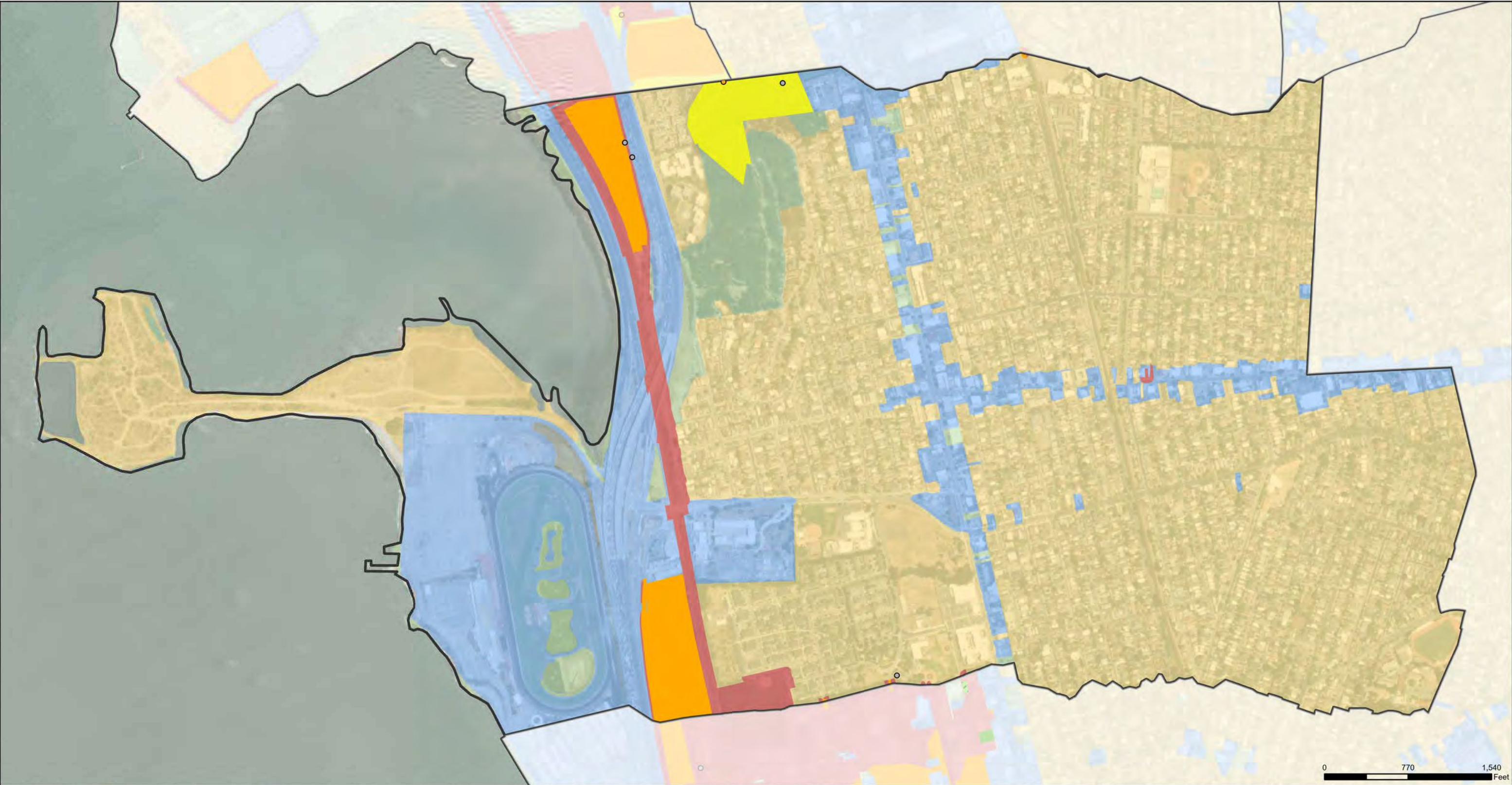
August 2024

Geosyntec consultants



cleanwater PROGRAM alameda county

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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Drainage Area Boundaries After 6/30/2022

Small FTC Projects within OIB^c

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Sediment Samples (through WY 2023)

<0.2 mg/kg PCBs & <0.3 mg/kg Hg

<0.2 mg/kg PCBs & >0.3 mg/kg Hg

0.2 - 1.0 mg/kg PCBs

>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Albany

Projects Treating Old Industrial and Moderate Area

Figure 3-2

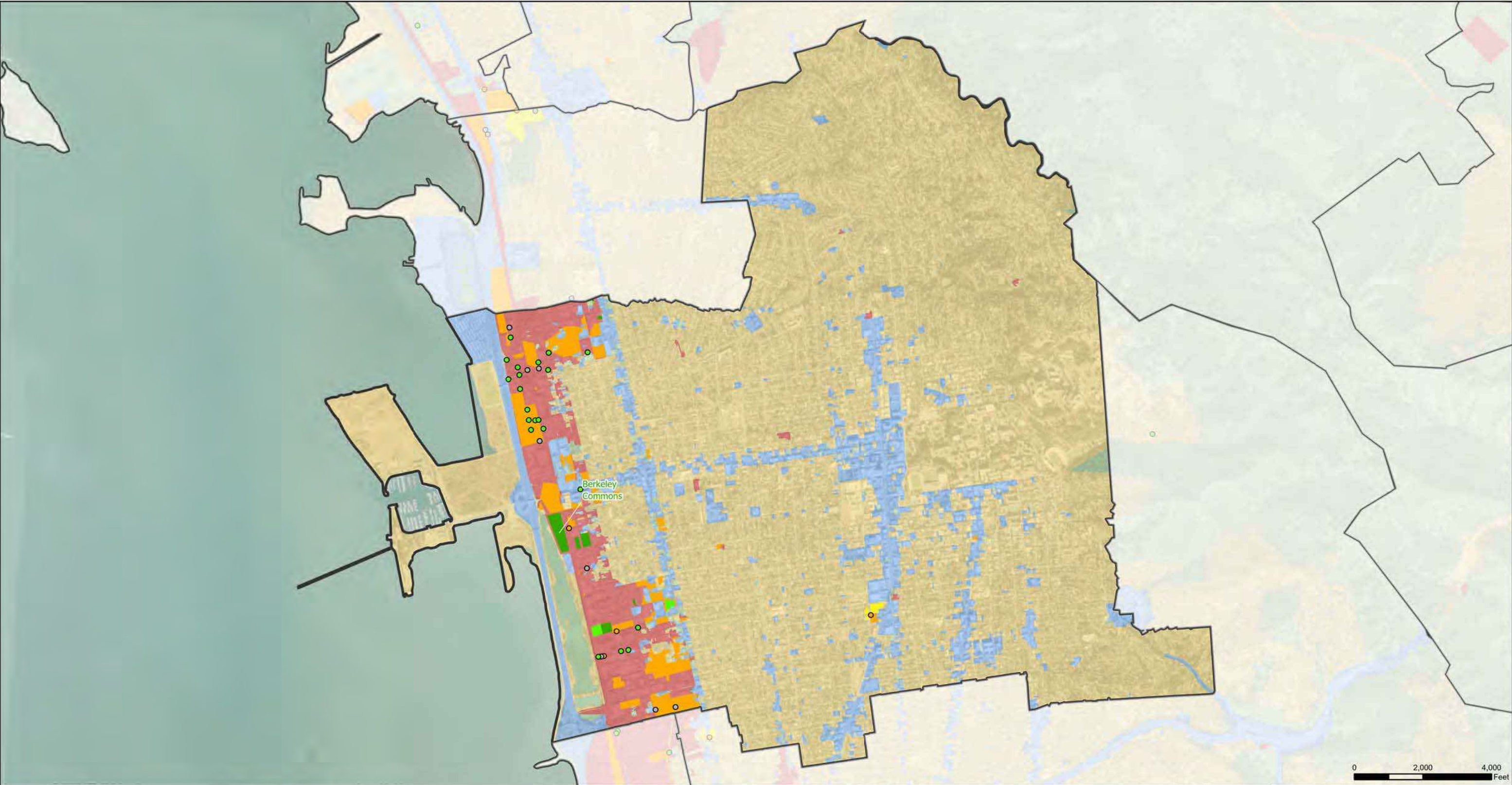
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Drainage Area Boundaries After 6/30/2022

Small FTC Projects within OIB^c

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Sediment Samples (through WY 2023)

<0.2 mg/kg PCBs & <0.3 mg/kg Hg

<0.2 mg/kg PCBs & >0.3 mg/kg Hg

0.2 - 1.0 mg/kg PCBs

>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Berkeley

Projects Treating Old Industrial and Moderate Area

Figure 3-3

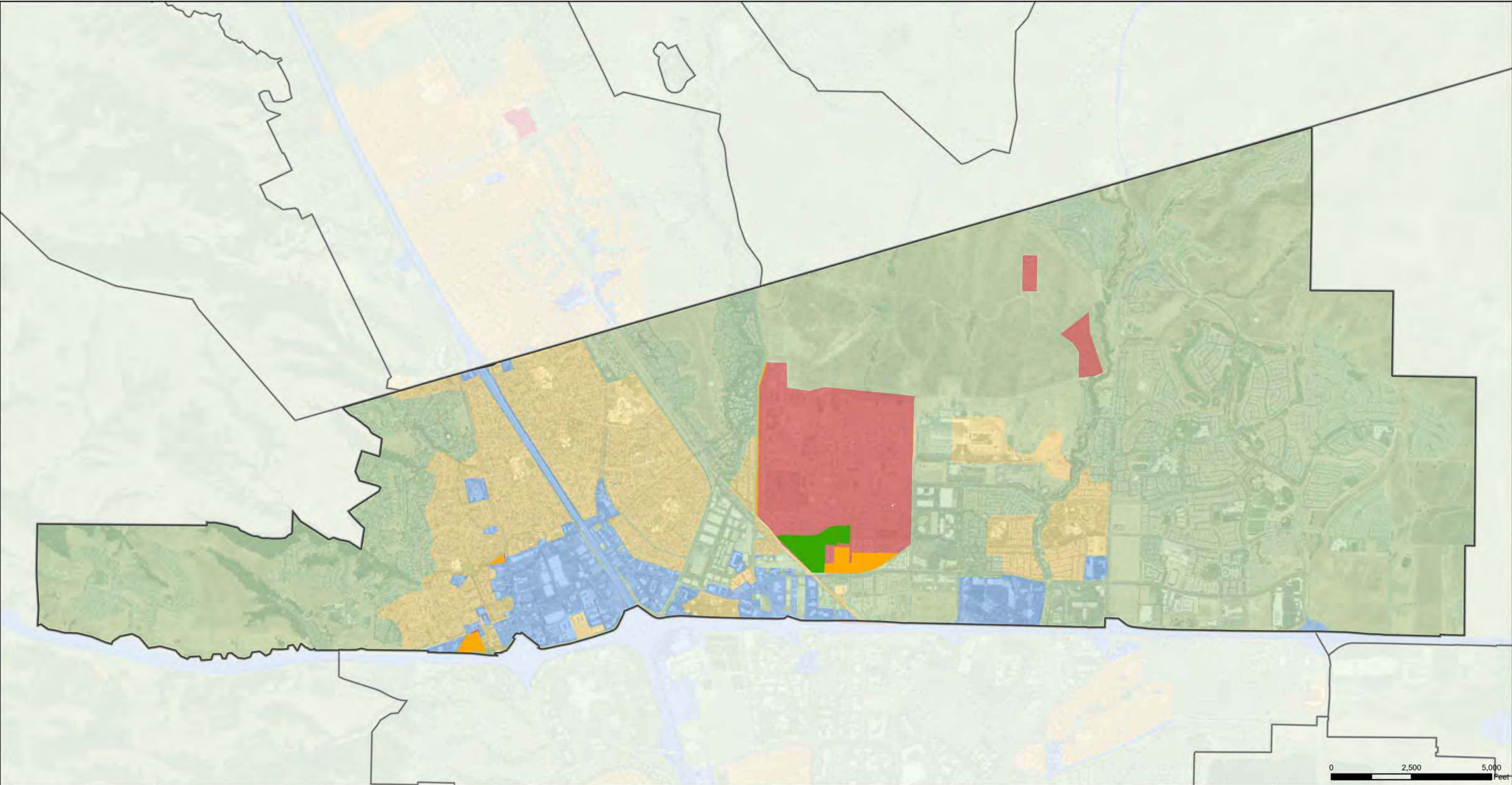
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Drainage Area Boundaries After 6/30/2022

Small FTC Projects within OIB^c

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Sediment Samples (through WY 2023)

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0.2 - 1.0 mg/kg PCBs

>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Dublin

Projects Treating Old Industrial and Moderate Area

Figure 3-4

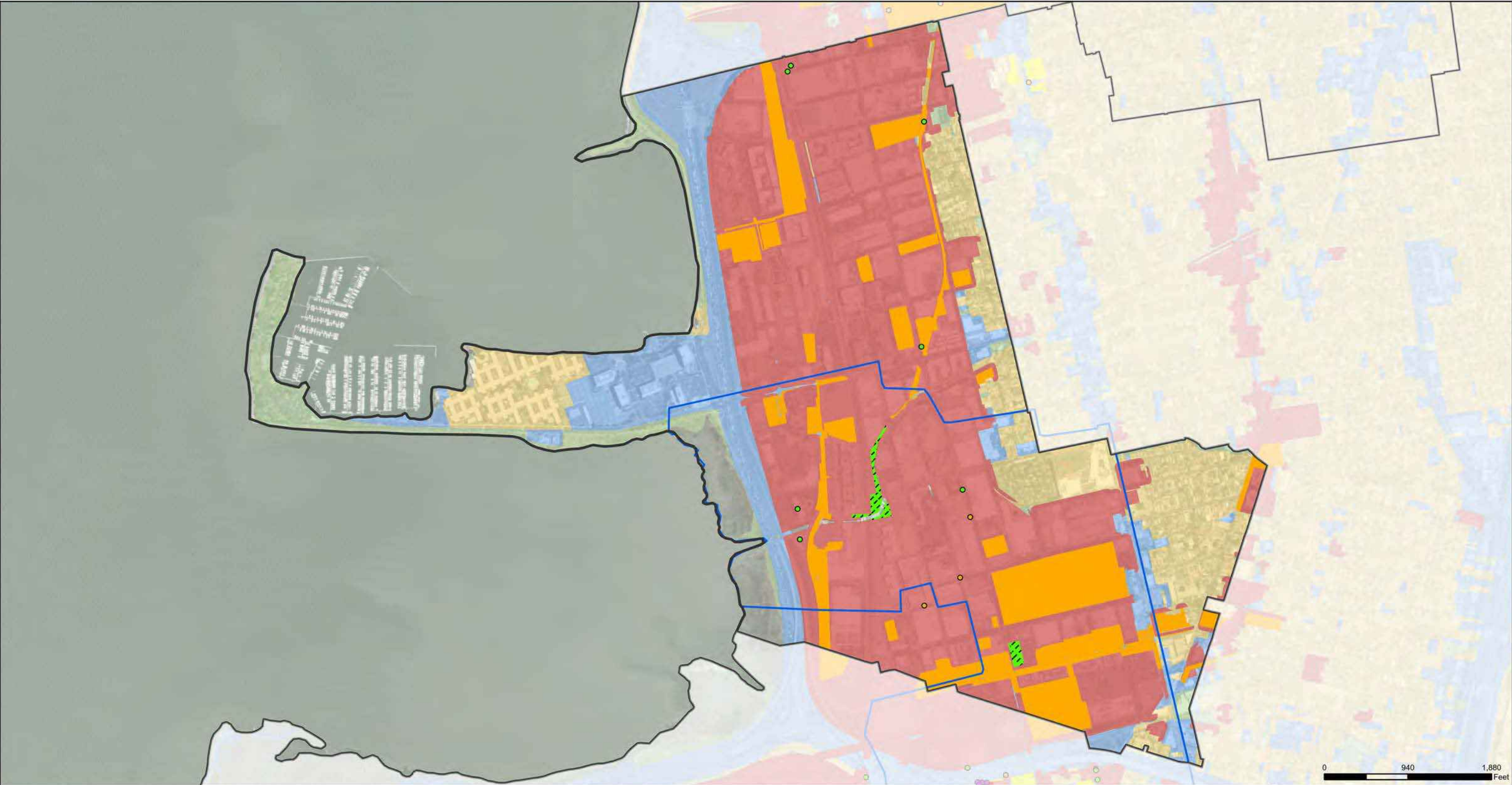
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Drainage Area Boundaries After 6/30/2022

Small FTC Projects within OIB^c

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Sediment Samples (through WY 2023)

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0.2 - 1.0 mg/kg PCBs

>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Emeryville

Projects Treating Old Industrial and Moderate Area

Figure 3-5

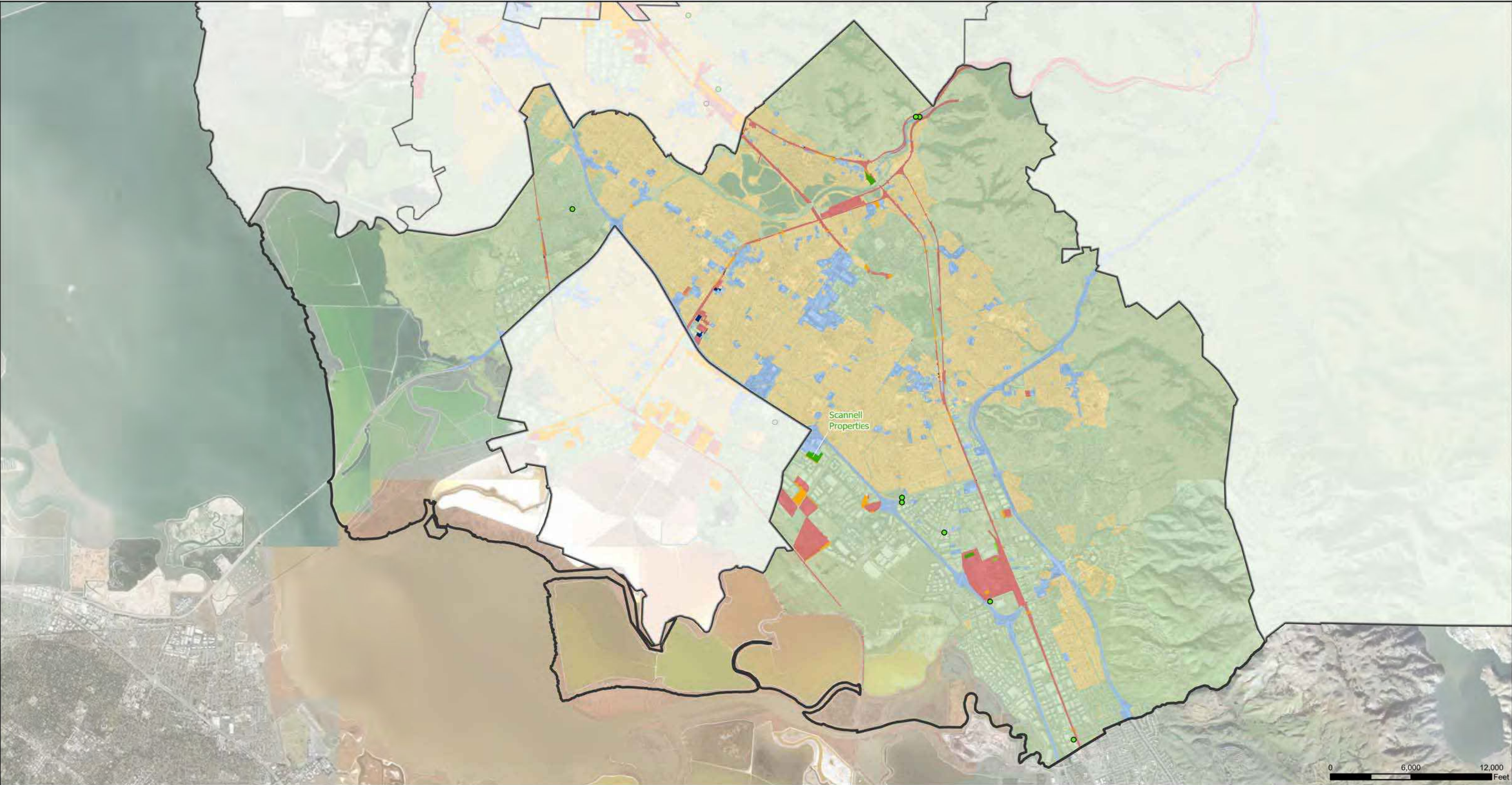
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Drainage Area Boundaries After 6/30/2022

Small FTC Projects within OIB^c

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Sediment Samples (through WY 2023)

<0.2 mg/kg PCBs & <0.3 mg/kg Hg

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0.2 - 1.0 mg/kg PCBs

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Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Fremont

Projects Treating Old Industrial and Moderate Area

Figure 3-6

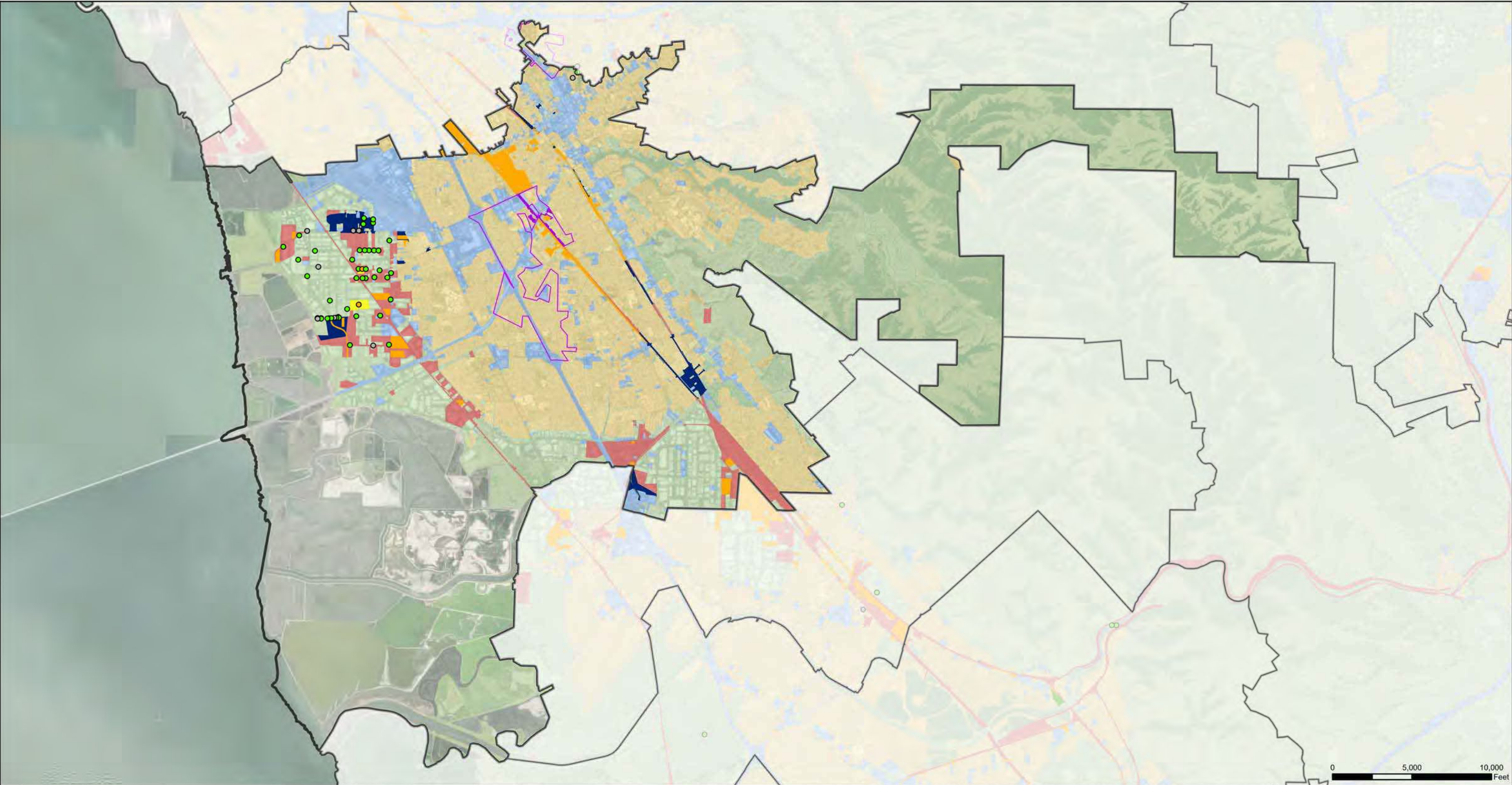
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Drainage Area Boundaries After 6/30/2022

Small FTC Projects within OIB^c

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Sediment Samples (through WY 2023)

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0.2 - 1.0 mg/kg PCBs

>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Hayward

Projects Treating Old Industrial and Moderate Area

Figure 3-7

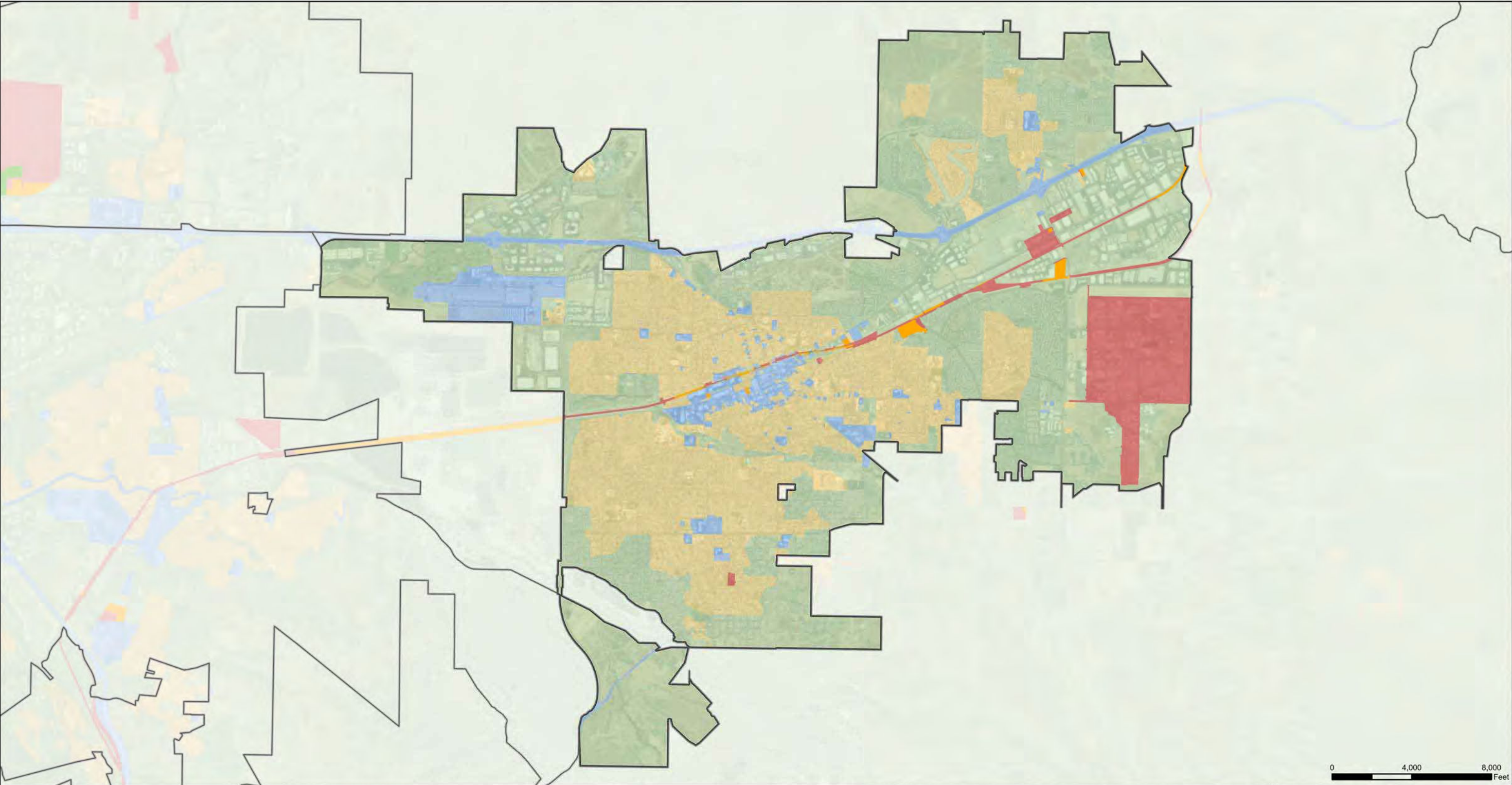
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

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Drainage Area Boundaries After 6/30/2022

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Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Livermore

Projects Treating Old Industrial and Moderate Area

Figure 3-8

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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Drainage Area Boundaries After 6/30/2022

Small FTC Projects within OIB^c

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Sediment Samples (through WY 2023)

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0.2 - 1.0 mg/kg PCBs

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Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Oakland

Projects Treating Old Industrial and Moderate Area

Figure 3-10

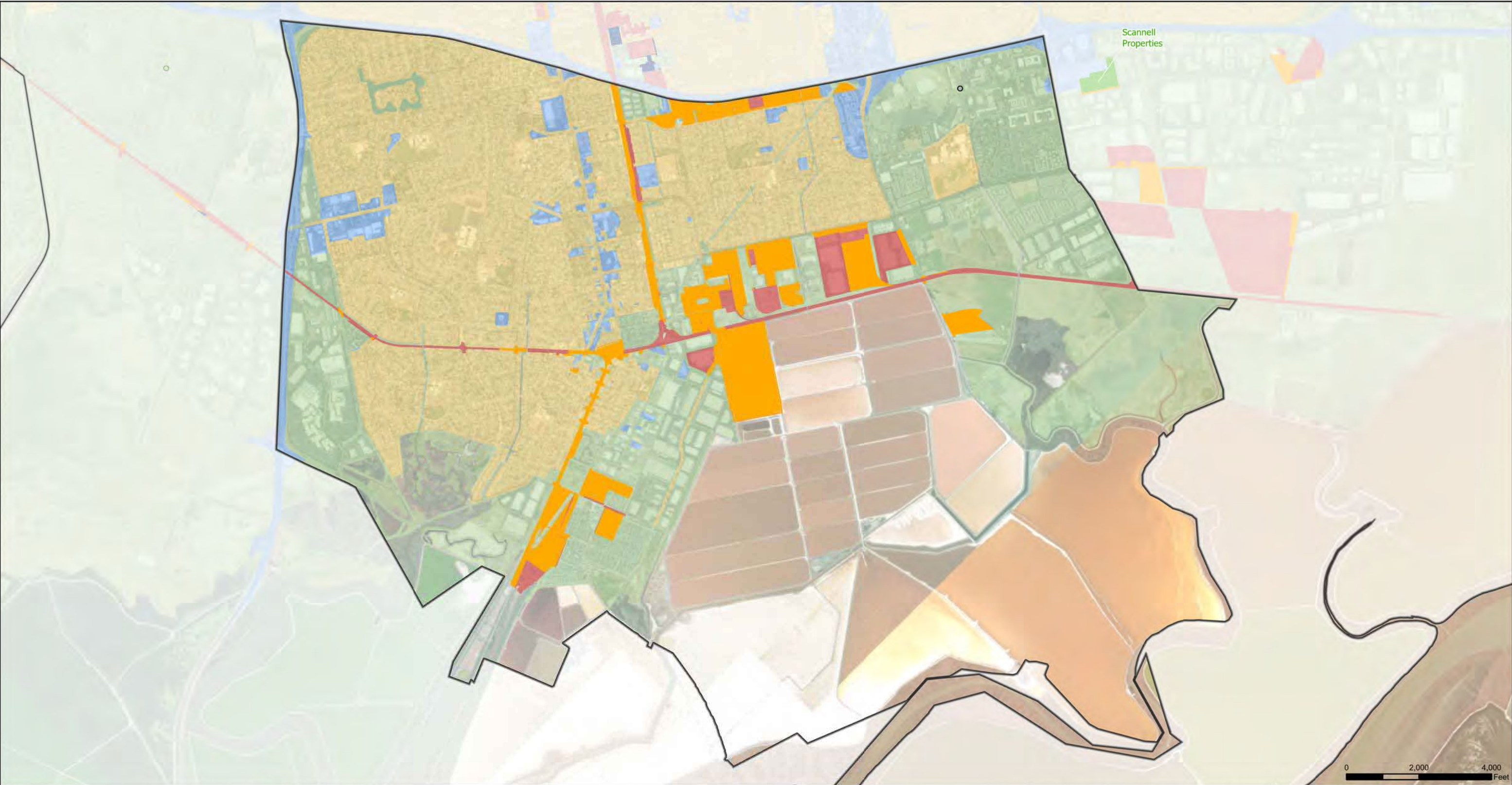
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

After 6/30/2022

Drainage Area Boundaries After 6/30/2022

Small FTC Projects within OIB^c

FTC Install Date

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After 6/30/2022

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>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Newark

Projects Treating Old Industrial and Moderate Area

Figure 3-9

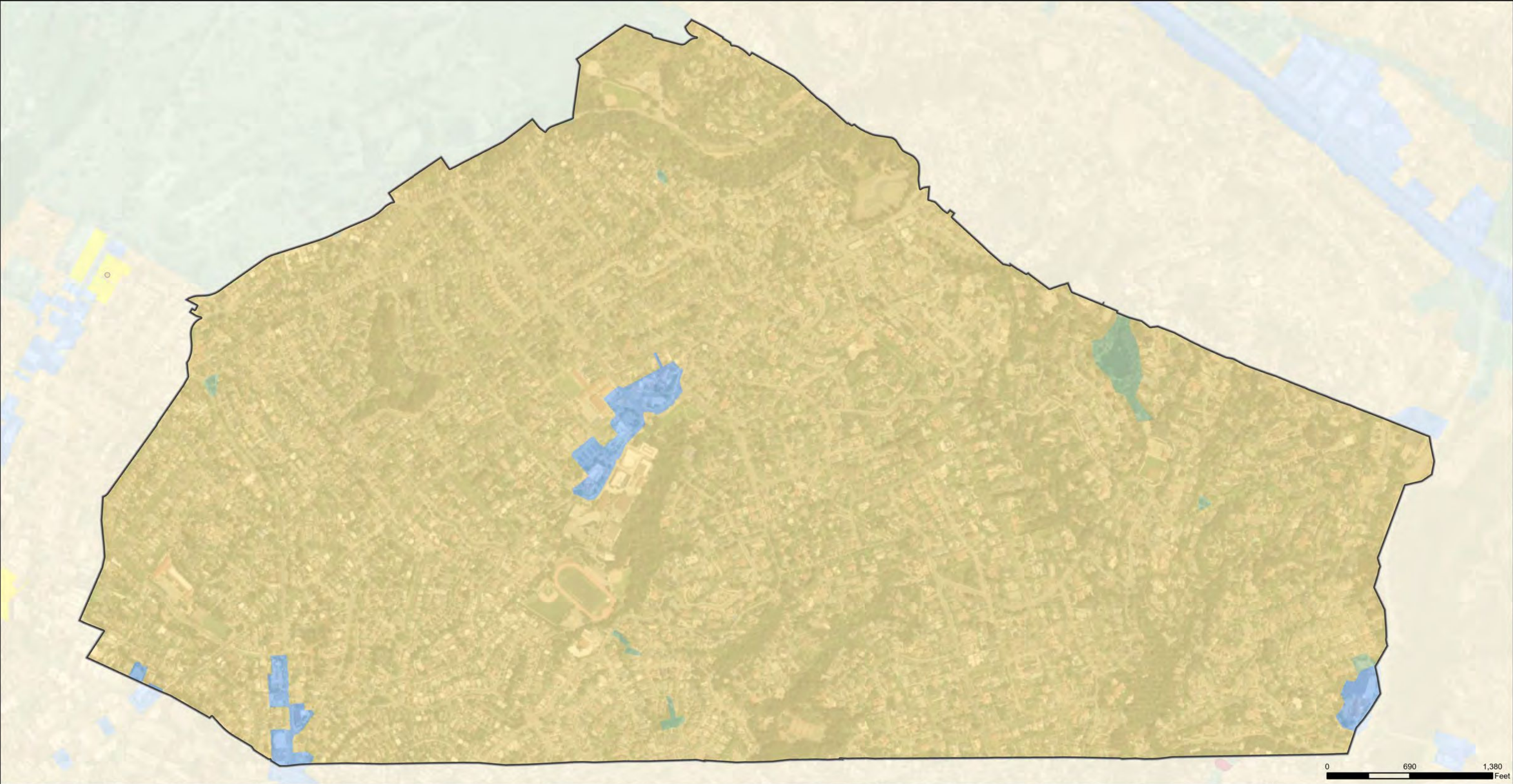
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

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Drainage Area Boundaries After 6/30/2022

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>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Piedmont

Projects Treating Old Industrial and Moderate Area

Figure 3-11

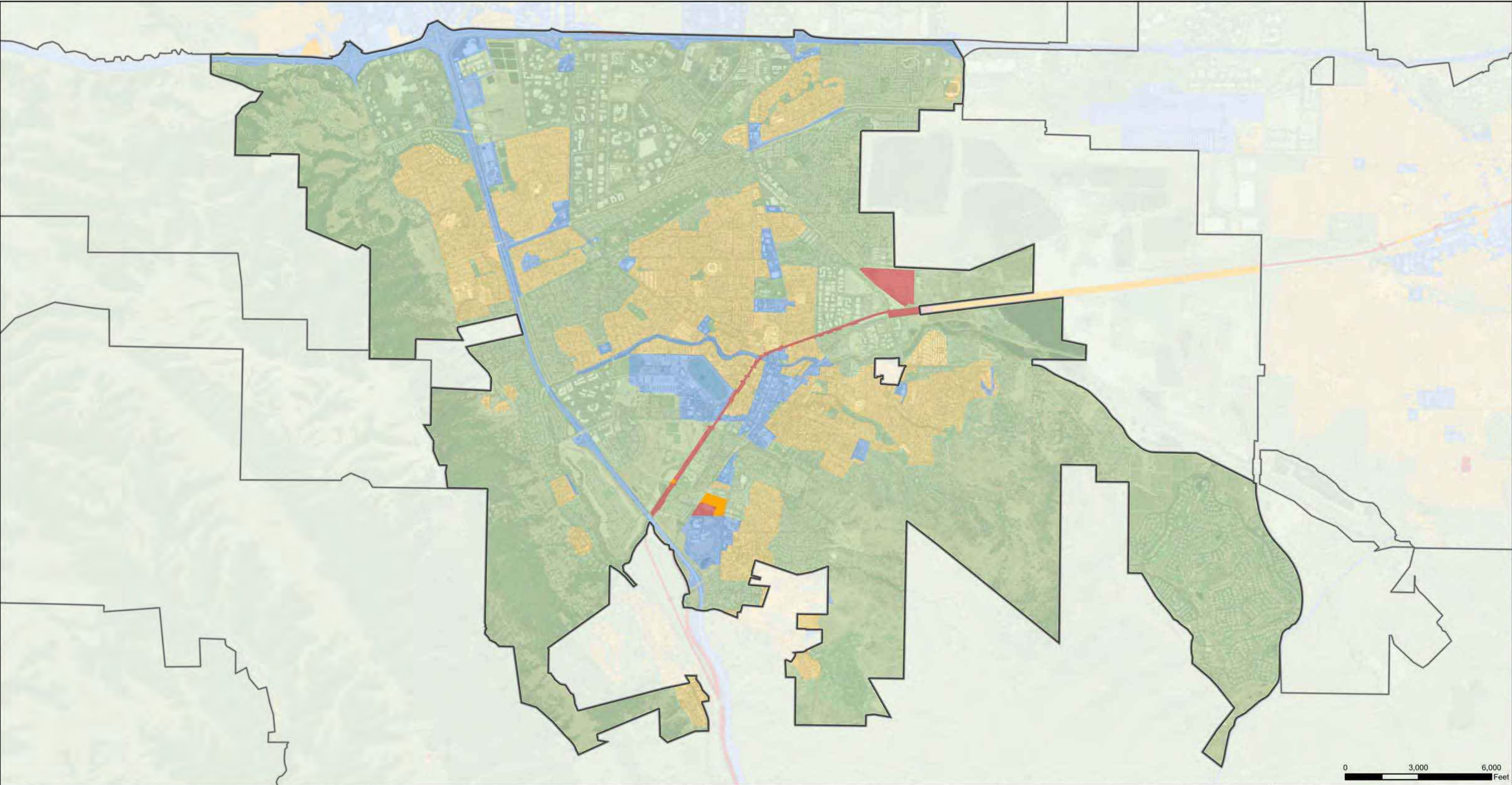
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

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GSI Projects within OIB

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Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

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FY21-22 (7/1/2021-6/30/2022)

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<0.2 mg/kg PCBs & >0.3 mg/kg Hg

0.2 - 1.0 mg/kg PCBs

>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Pleasanton

Projects Treating Old Industrial and Moderate Area

Figure 3-12

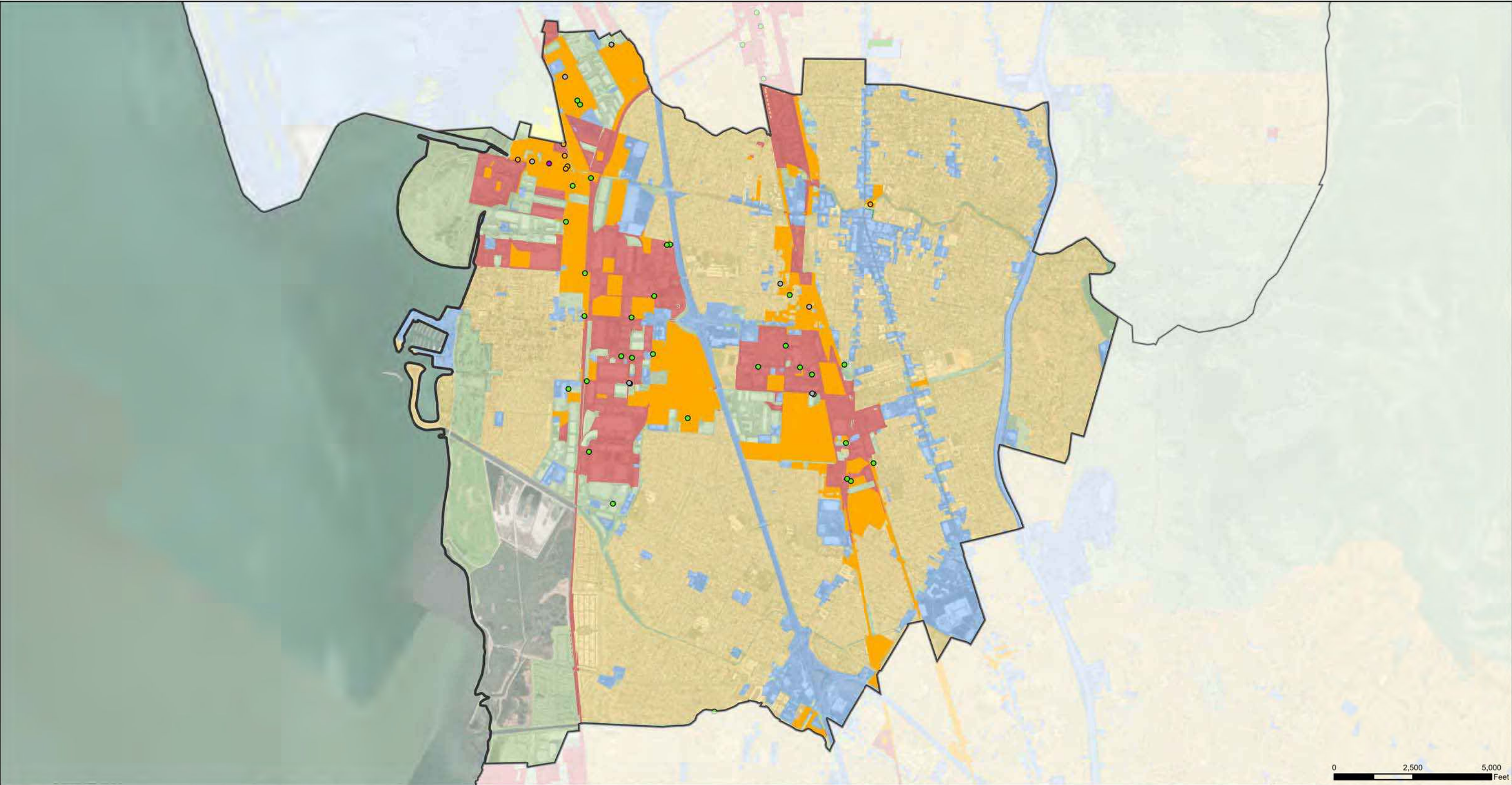
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

GSI Projects FY21-22 (7/1/2021-6/30/2022)

Redevelopment

Retrofit

GSI Projects After 6/30/2022

Redevelopment^a

Retrofit

Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

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>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of San Leandro

Projects Treating Old Industrial and Moderate Area

Figure 3-13

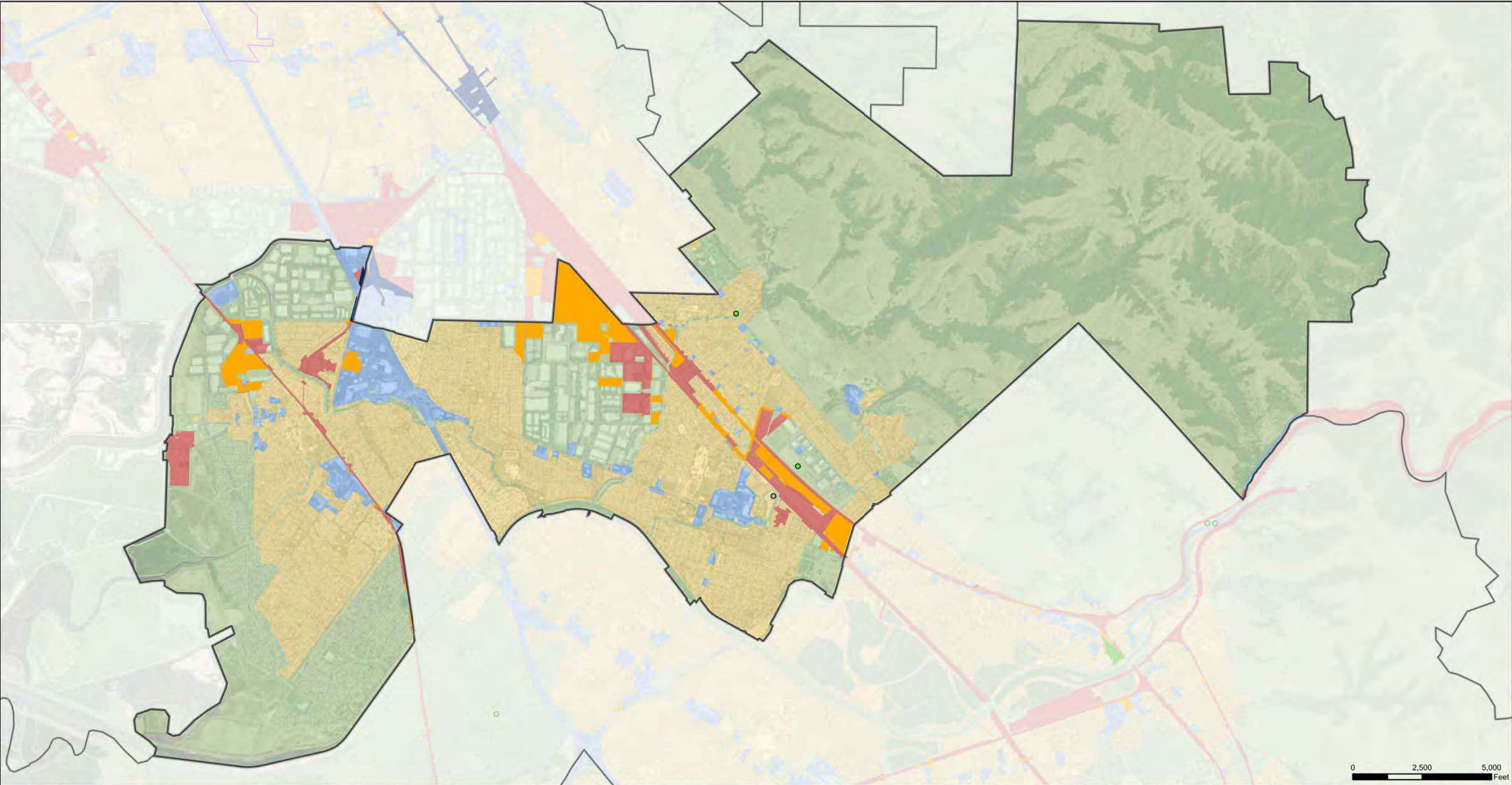
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

Untreated Moderate Area (Non Old Industrial Areas with ≥ 0.2 mg/kg)

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>1.0 mg/kg PCBs

Notes:

a: Project labels indicate projects with moderate to high concentrations of PCBs.

b: Includes HDS and GSRD

c: Includes Basket, CPS, Inlet Filter

City of Union City

Projects Treating Old Industrial and Moderate Area

Figure 3-14

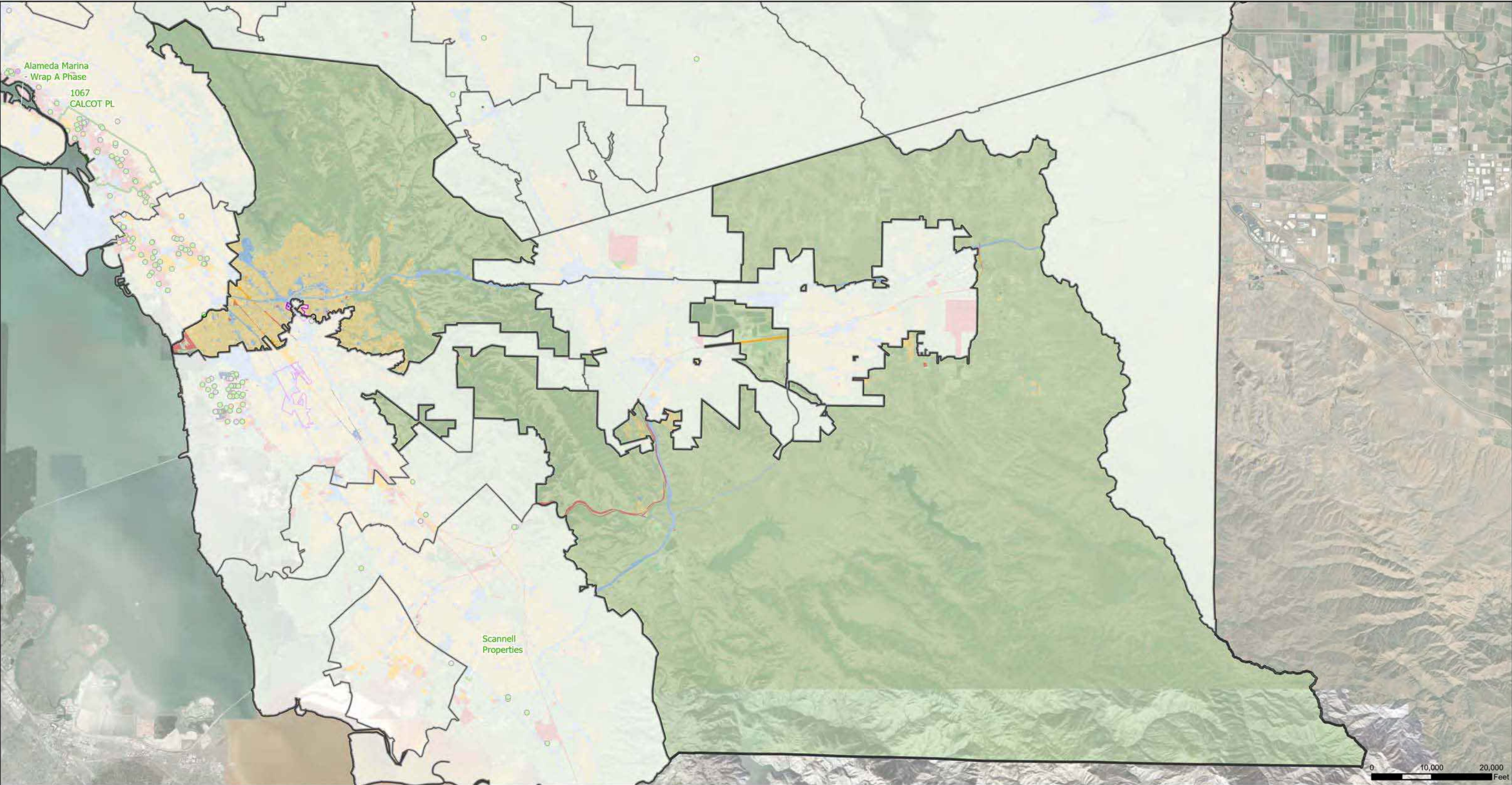
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City Limits

Emeryville Crescent Watershed Investigation Area

San Leandro Bay Watershed Investigation Area

Baseline Category

Old Commercial & Old Transportation

Old Residential

New Urban & Open Space

Old Industrial Baseline (OIB)

Source Properties (Referred)

Untreated Old Industrial

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Treated by GSI Or FTC Through 6/30/2021

GSI Projects within OIB

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Redevelopment

Retrofit

GSI Projects After 6/30/2022

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Large FTC within OIB^b

FTC Install Date

FY21-22 (7/1/2021-6/30/2022)

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Drainage Area Boundaries After 6/30/2022

Small FTC Projects within OIB^c

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0.2 - 1.0 mg/kg PCBs

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Notes:

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c: Includes Basket, CPS, Inlet Filter

City of Alameda County

Projects Treating Old Industrial and Moderate Area

Figure 3-15

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APPENDIX A

Municipal Operations Alameda Municipal Power Stormwater Pollution Prevention Plan: July 3, 2023 (Amendment #5)

**Municipal Operations
Alameda Municipal Power
Stormwater Pollution Prevention Plan
for:**

Alameda Municipal Power
2000 Grand St
Alameda, CA 94501
(510) 748-3900

SWPPP Contact(s):

Matthew Gerry
2000 Grand St
Alameda, CA 94501
(510) 814-6416
Gerry@alamedamp.com

SWPPP Preparation Date:

Original: 5/20/2009
Amendment #1: 1/26/2010
Amendment #2: 10/14/2016
Amendment #3: 4/25/2019
Amendment #4: 8/20/2020
Amendment #5: 7/3/2023

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SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Alameda Municipal Power Service Center

Street: 2000 Grand St

City: ALAMEDA

State: CA ZIP Code: 94501

County: ALAMEDA

Estimated area at site: 2 acres

Discharge Information

This facility discharges storm water into the City of Alameda's separate storm sewer system.

Name(s) of water(s) that receive stormwater from your facility: San Francisco Bay, Central

Are any of your discharges directly into any segment of an "impaired" water?

☒ Yes ☐ No

If Yes, identify name of the impaired water (and segment, if applicable): San Francisco Bay, Central

Identify the pollutant(s) causing the impairment: Mineral Oil, Diesel Fuel, Gasoline, Motor Oil, PCBs, Hydraulic Fluids, Asphalt Oil, Paint, Solvents, Waste Dumpster, Green Waste Bins and Dumpster, Recycling Bins, and Scrap Metals Dumpsters,

For pollutants identified, which do you have reason to believe will be present in your discharge? None

For pollutants identified, which have a completed Total Maximum Daily Load (TMDL)? PCBs

1.2 Contact Information/Responsible Parties

Facility Operator (s):

Name: Alameda Municipal Power, a Department of the City of Alameda
Address: 2000 Grand Street
City, State, Zip Code: Alameda, CA, 94501

Telephone Number: (510) 814-6420
Email address: stier@alamedamp.com

Facility Owner (s):

Name: John Stier, Support Services Manager Alameda Municipal Power, a Department of the City of Alameda
Address: 2000 Grand Street
City, State, Zip Code: Alameda, CA, 94501
Telephone Number: (510) 814-6420
Email address: stier@alamedamp.com

SWPPP Contact:

Name: Matthew Gerry, Safety Officer Alameda Municipal Power, a Department of the City of Alameda
Address: 2000 Grand Street
City, State, Zip Code: Alameda, CA, 94501
Telephone number: (510) 814-6416
Email address: gerry@alamedamp.com

1.3 Stormwater Pollution Prevention Team

Staff Names	Individual Responsibilities
Facility Maintenance: John Narvaez	Maintains Alameda Municipal Power facilities keeping them safe, secure, clean and in proper working order. Implements daily SWPPP practices.
	Performs carpentry, cabinet work, painting, plumbing, electrical, minor welding and sprinkler system repairs, and minor HVAC repairs and maintenance.
	Moves and repairs equipment.
	Contacts, meets with, negotiates, schedules and monitors the work of outside Facilities contractors.
Storekeeper: Michael Ru	Receives, warehouses, and issues equipment, materials, and tools. Processes electrical equipment for testing, repairs, and disposal.
Safety Officer: Matt Gerry	SWPPP implementation oversight. Assigned the primary responsibility for ensuring that BMPs are implemented and that all persons using the facility are aware of BMPs.
Alternate: Support Services Manager John Stier	

1.4 Activities at the Facility

Alameda Municipal Power has one Service Center located at 2000 Grand Street which is our operations hub with warehousing and vehicle parking area for heavy- and light-duty vehicles assigned to Alameda Municipal Power.

Our remote operational facilities are high-voltage transmission and distribution switchyards, and include the following locations:

- Cartwright Substation, 90 W. Atlantic Ave, Alameda
- Jenney Substation, 2179 Clement Ave, Alameda
- West Transition Station, 2417 Mariner Square Drive, Alameda
- East Transition Station, 2020 High Street, Alameda
- Tidewater, 4573 Tidewater Ave, Oakland

Typical activities at these sites are operating, inspecting and maintaining the energized high voltage equipment.

Our remote storage facilities are used to house oversized equipment and material, and include the following locations:

- Warehouse, 1835 Oak Street, Suite C, Alameda
- Central Storage, 1818 Grand Street, Alameda – damaged equipment
- Temp pole storage facility, Bldg 410, Viking Street, Alameda

SECTION 2: POTENTIAL POLLUTANT SOURCES

- Describe areas at your facility where materials or operations/activities are exposed to rainfall or runoff. Include a list of activities exposed to stormwater (e.g., material storage; waste storage; equipment/vehicle fueling, equipment/vehicle maintenance and cleaning) and the pollutants or pollutant constituents (e.g., motor oil, fuel, battery acid, and cleaning solvents) associated with these activities.
- In your list of pollutants associated with your facility activities, include all significant materials that have been handled, treated, stored, or disposed, and that have been exposed to stormwater in the 3 years prior to the date you prepare your SWPPP.

2.1 Facility Activity and Associated Potential Pollutants

Facility Activity	Associated Potential Pollutants
2000 Grand Street Service Center: Vehicle parking, hazardous materials storage, mineral oil storage, loading dock, waste/recycling materials staging	Mineral Oil, Diesel Fuel, Gasoline, Motor Oil, PCBs, Hydraulic Fluids, Asphalt Oil, Paint, Solvents, Waste Dumpster, Green Waste Bins and Dumpster, Recycling Bins, and Scrap Metals Dumpsters.
Remote Storage Facilities: House	Mineral Oil, Diesel Fuel, Gasoline, Motor

oversized equipment and material	Oil, Hydraulic Fluids, Waste Dumpster, Treated Pole Butt Dumpster, Copper Naphthenate.
Remote Operational Facilities: Operate, inspect and maintain energized high voltage equipment	Mineral Oil, Diesel Fuel, Gasoline, Motor Oil, Hydraulic Fluids

2.2 Potential for Spills and Leaks

Areas of Site Where Potential Spills/Leaks/Discharges Could Occur

Location	Storm Drain Inlets/Discharge Points
Service Center	Five in corp yard, one in front parking lot, and one at loading dock.
Remote Storage Facilities – Central Storage	Gate valve in containment area.
Remote Storage Facilities – Warehouse	One stormwater drain.
Remote Operational Facilities – Cartwright Substation	Gate valve in containment area.
Remote Operational Facilities – Jenney Substation	One stormwater drain. Gate valve in containment area.

SECTION 3: STORMWATER CONTROL MEASURES

The following sections describe the stormwater control measures that have been installed and are implemented at the AMP facilities to meet the municipal stormwater permit's best management practices requirements.

3.1 Minimize Exposure

Service Center

- Most parked vehicles are parked under carports and location is kept clean.
- No vehicle washing, except for dry cleanup methods.
- Paint, solvents, hydraulic fluids and mineral oil are stored in an indoor building with a bermed containment area or cabinets under covered spaces.
- Stormwater drains have sediment collection and water filtration, and are inspected and cleaned every four months.

Remote Storage Facilities

- Most trailers are parked under carports or indoors and location is kept clean.
- No vehicle washing.
- If possible, mineral oil filled electrical equipment is stored in an outdoor bermed containment area and a portable water filtration system is installed on gate valves anytime water is discharged.
- If possible, material and mineral oil filled electrical equipment is stored indoors or undercover and away from storm drains.
- Some mineral oil filled electrical equipment is stored outdoors with wattling around some of the perimeter to filter the sheet layer runoff.
- Stormwater drains have sediment collection and water filtration, and are inspected and cleaned every four months.

Remote Operational Facilities

- No vehicle washing.
- If possible, mineral oil filled electrical equipment is stored in an outdoor bermed containment area.
- Some mineral oil filled electrical equipment is stored outdoors away from storm drains.
- Stormwater drains have sediment collection and water filtration, and are inspected and cleaned every four months.

3.2 Good Housekeeping

Describe any practices you are implementing to keep exposed areas of your site clean. Describe where each practice is being implemented at your site. Include here your schedule for:

(1) regular pickup and disposal of waste materials, and (2) routine inspections for leaks and of the condition of drums, tanks, and containers.

Service Center

- Swept and blown on a weekly basis.
- Waste disposal materials kept covered.
- Waste, recycling, and green organics picked up weekly.
- Scrap metal and green waste from field picked up on as-need basis.
- Damaged electrical equipment taken out of service staged indoors in bermed area until disposed as needed.
- E-waste stored indoors until disposed as needed.
- Routinely inspected and cleaned as needed.
- Drain sediment collection and filtering systems are cleaned and replaced at four month intervals.

Remote Storage Facilities

- Swept and blown on an as-needed basis.
- Waste disposal materials and pole butts kept covered and disposed as needed.
- Undamaged electrical equipment taken out of service staged until disposed as needed.
- Routinely inspected and cleaned as needed, including bermed containment areas, gate valves, wattling is in good condition and properly placed, and materials covered.
- Drain sediment collection and filtering systems are cleaned and replaced at four month intervals.

Remote Operational Facilities

- Swept and blown on an as-needed basis.
- Undamaged electrical equipment taken out of service staged until disposed as needed.
- Damage electrical equipment staged in bermed containment areas until disposed as needed.
- Routinely inspected and cleaned as needed, including bermed containment areas, gate valves, and electrical equipment in service.
- Drain sediment collection and filtering systems are cleaned and replaced at four month intervals.

3.3 Maintenance

Describe procedures 1) to maintain facility equipment so that spills/leaks are avoided, and 2) to maintain any of your site's control measures in effective operating condition. Include the schedule you will follow for such maintenance activities. Describe where each applicable procedure is being implemented at the site.

Service Center

- Inspection of vehicles is performed regularly and as required by DOT. If vehicle repairs are needed, they are performed by qualified personnel at the City of Alameda Central Equipment Garage.
- Repair of outfitted mechanisms for outfitted vehicles may be performed at facility with service personnel made aware of stormwater drains.
- Drain sediment collection and filtering systems are cleaned and replaced at four month intervals.

Remote Storage Facilities

- Routinely inspected and cleaned as needed, including bermed containment areas, gate valves, wattling is in good condition and properly placed, and materials covered.
- Drain sediment collection and filtering systems are cleaned and replaced at four month intervals.

Remote Operational Facilities

- Routinely inspected and cleaned as needed, including bermed containment areas, gate valves, wattling is in good condition and properly placed, and materials covered.
- Drain sediment collection and filtering systems are cleaned and replaced at four month intervals.

3.4 Spill Prevention and Response

Describe any structural controls or procedures used to minimize the potential for leaks, spills, and other releases. Describe where each control is located or where applicable procedures will be implemented.

The Spill Prevention and Response procedures for each facility are described in the Hazardous Materials Business Plan, Section 2 (Spill Prevention Control Countermeasure and Facility Response Plan) per the requirements in Title 40 CFR 112.7. It describes procedures for:

- Plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur.
- Preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling.
- Procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases, including spill kits.
- Procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies.

3.5 Erosion and Sediment Controls

Describe structural or non-structural controls used at your site to stabilize exposed areas and contain runoff to minimize onsite erosion and potential offsite discharges of sediment. Note: You must at a minimum implement flow velocity dissipation devices at outfalls and discharge channels. Describe the location at your site where each control will be implemented.

Service Center

- Facility area is paved, enclosed, or covered by overhangs with the exception of landscaped areas.

Remote Storage Facilities

- Facility areas are paved, enclosed or covered by overhangs with the exception of landscaped areas.

Remote Operational Facilities

- Facilities are designed with a base of highly compacted materials (sand, crushed rock, gravel) which controls erosion and sediment.

3.6 Employee Training

Describe your plan for training the employees who work in areas where facility materials or activities are exposed to stormwater, or who are responsible for implementing BMP activities, including all members of your Pollution Prevention Team. Included in your description must be the frequency of training (note: recommended at least one time per year), and the schedule you will follow.

- Annual training to SWPPP requirements prior to the start of the rainy season.

3.7 Non-Stormwater Discharges

Describe how you eliminated any unauthorized non-storm water discharges at your site.

Service Center

- Cleaning of smaller vehicles is at commercial car wash facilities. Currently there is no facility located within the City of Alameda that can accommodate the larger Operations vehicles, such as trouble trucks, bucket trucks, digger derricks, etc.. These vehicles need to be cleaned at a facility in Oakland.
- Facility areas are paved, enclosed, or covered by overhangs with the exception of landscaped areas.
- Bermed areas.
- Inlets to the storm drainage system are labeled with a marker such as "No Dumping - Drains to Bay".

Remote Storage Facilities

- No vehicles are parked or cleaned at these facilities. Facility areas are paved, enclosed, or covered by overhangs with the exception of landscaped areas.
- Bermed areas.
- Wattling is installed around the perimeter of some facilities to filter non-storm water discharges.

Remote Operational Facilities

- No vehicles are parked or cleaned at these facilities.
- Bermed areas.
- Temporary containment areas are used whenever maintenance procedures are performed using hazardous materials.

3.8 Waste, Garbage and Floatable Debris

Describe controls and procedures that will be used at your site to minimize discharges of waste, garbage, and floatable debris. Describe the location at your site where each control and/or procedure will be implemented.

Service Center

- Site is inspected regularly and cleaned as required.

Remote Storage Facilities

- Site is inspected regularly and cleaned as required.

Remote Operational Facilities

- Site is inspected regularly and cleaned as required.

3.9 Dust Generation and Vehicle Tracking of Facility Materials

Describe controls and procedures you will use at your site to minimize the generation of dust and off-site tracking of raw, final, or waste materials. Describe the location at your site where each control and/or procedures will be implemented.

All Facilities

- All facilities with asphalt surfaces are cleaned when required utilizing sweeping and dry cleanup methods.
- All facilities with a base of highly compacted road bed materials controls dust generation and vehicle tracking.

SECTION 4: INSPECTIONS

Describe your procedures for performing routine facility inspections and comprehensive site inspections.

The names of the person(s), or the positions of the person(s), responsible for inspection:

- John Narvaez, Facilities Maintenance
- Matthew Gerry, Safety Officer
- Storm Water Inspection & Maintenance Services Inc.

Service Center

- Safety Officer inspects and requests Stores to assist in cleaning as required.
- Storm Water Inspection & Maintenance Services Inc. inspects all storm drain inlets every four months and replaces drain inlet sediment collection filters as required. Debris around storm drain inlets is cleaned every four months during inspection.
- City stormwater program personnel perform regular stormwater pollution prevention assessments annually.

Remote Storage Facilities

- Facility Maintenance inspects weekly and cleans as required.
- Storm Water Inspection & Maintenance Services Inc. inspects all storm drain inlets every four months and replaces drain inlet sediment collection filters as required. Debris around storm drain inlets is cleaned every four months during inspection.

Remote Operational Facilities

- Electrical Equipment Operations personnel inspects monthly and escalates to Facility Maintenance Work for cleaning as required.

Storm Drain Inlets/Catch Basins and Inlet Filters Inspection and Maintenance Checklist

Property Address: _____

Property Owner: _____

Inlet Identification #: _____ Date of Inspection: _____ Type of Inspection: ☐ Pre-rainy season ☐ Monthly ☐ Quarterly ☐ Annual

Inspector(s): _____

Defect	Conditions When Maintenance Is Needed	Maintenance Needed? (Y/N)	Comments (Describe maintenance completed and if needed maintenance was not conducted, note when it will be done)	Results Expected When Maintenance Is Performed
Debris accumulation on grate	Debris prohibits water flow into grate.			Debris removed and further debris accumulation monitored.
Sediment/ debris accumulation in filter cage	Sediment/debris prevents effective filtering.			Sediment/debris removed, sorbent pillows (filter media) replaced, and sediment/debris levels monitored to prevent clogging or blockage.
Trash and Debris Accumulation in Drain Inlet/Catch Basin	Trash and debris accumulated in the drain inlet/catch basin.			Trash and debris removed from drain inlet/catch basin.
Filter/insert media in Drain Inlet/Catch Basin not receiving scheduled, routine service and replacement	Potential for pollutants to by-pass the filter/insert media.			Filter/insert media performing to manufacturer's specifications.
Standing Water in Storm Drain	When water stands in the storm drain inlet between storms and does not drain freely.			There should be no areas of standing water once inflow has ceased.
Miscellaneous	Any condition not covered above that needs attention according to the maintenance plan.			Meet the requirements prescribed in the maintenance plan.

Routine Facility SWPPP Inspection Checklist

Facility:

Inspector:

Date:

DIRECTIONS: Complete the following checklist while surveying your facility. If you answer "no" to any of the questions, initiate appropriate best management practice(s) (BMP) to prevent pollutant discharge into the storm drain system. (N/A: Not Applicable)

	Yes	No	N/A
1. Are storage containers including drums, waste dumpsters and/or trash compactors: free from crack/leaks? have lids or covers that are kept closed? not exposed to rain water?	☐ ☐ ☐	☐ ☐ ☐	☐ ☐ ☐
2. Are storage areas enclosed or covered from the rain?	☐	☐	☐
3. Are material processing or handling areas enclosed or covered from the rain?	☐	☐	☐
4. Are parking areas or access roads free of signs of excessive oil and/or motor fluids, leaks, stains, litter, and sediments?	☐	☐	☐
5. Are vehicle repair and maintenance areas covered or out of the rain?	☐	☐	☐
6. Are vehicles and heavy equipment that are stored outside free of leaks and grime?	☐	☐	☐
7. Are spills in fuel or vehicle/equipment maintenance areas prevented from entering the storm drain system?	☐	☐	☐
8. Are dry cleaning methods (for example, sweeping, damp mopping, absorbents) used to clean: shop floors? material processing areas? material storage areas? waste disposal areas? access roads? parking lots?	☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐
9. Are all washwaters and/or process wastewaters discharged to the sanitary sewer or recycled instead of discharged directly or indirectly to the storm drain system?	☐	☐	☐
10. Are storm drain inlets and catch basins inspected and cleaned on a regular schedule (see detail sheet)?	☐	☐	☐
11. Are waste products from rooftop equipment (for example, oil and grease from rooftop motors/pumps/vents) protected from exposure to stormwater?	☐	☐	☐

Comments/Follow up:

SECTION 5: SWPPP MODIFICATIONS

Your SWPPP is a “living” document and is required to be modified and updated, as necessary. Keep a log with a description of the modification, the name of the person making it, and the date and signature of that person.

SWPPP Amendment #	Amendment Date	Brief Description of Amendment	Prepared By
Original	5/20/2009		
Amend #1	1/26/2010	Contact change	Streich
Amend #2	10/14/2016	Contact change	Breuner
Amend #3	4/25/2019	Contact change & Update location mitigation	Yang
Amend #4	8/20/2020	Contact change & SWPPP maintenance vendor update	
Amend #5	7/5/2023	Contact Change for Support Services and Facilities Maintenance	Gerry

SWPPP ATTACHMENTS

Attach the following documentation to the SWPPP:

***Attachment A – Excerpt of the Municipal Stormwater Permit
(Provision C.2.f.) - Corporation Yard BMP Implementation***

<https://cleanwaterprogram.org/wp-content/uploads/2022/12/Order-No.-R2-2022-0018-and-Attachments.pdf>

***Attachment B – Municipal Operations Source Control Best
Management Practices Guidance (from CASQA)***

<https://www.casqa.org/resources/bmp-handbooks/municipal-bmp-handbook>

APPENDIX B

PCBs Loads Avoided Resulting from the Removal of Municipally Owned PCBs- Containing OFEE

Memorandum

Date: August 23, 2024
To: Sandy Mathews, Alameda County Clean Water Program
From: Lisa Austin, Senior Principal; Lisa Welsh, Senior Scientist; and Emily Meyers, Senior Staff Engineer
Subject: PCBs in Electrical Utilities Management Program – FY2023/24 Alameda Municipal Power Load Reductions
Geosyntec Project Number: CWR0948

1. BACKGROUND

Municipal Regional Stormwater Permit (MRP; Order No. R2-2022-0018) Provision C.12.e requires Permittees to manage polychlorinated biphenyls (PCBs) in oil-filled electrical equipment (OFEE) for municipally owned electrical utilities in the MRP program area. Alameda Municipal Power (AMP) is the only municipally owned electrical utility in Alameda County.

This technical memorandum documents the following item for AMP, as required by MRP Provision C.12.e.iii.(4): a summary of the actions undertaken during the reporting year that removed municipally owned PCBs-containing OFEE along with the loads avoided and the details of the calculations and assumptions used to estimate the load reduced. The requirement, per Provision C.12.e.iii.(3), for AMP to submit a summary of their plans to maintain and upgrade OFEE, is addressed in Section 5 of the *Mercury and PCBs Control Measures - 2024 Update*.

2. PCBS LOAD REDUCTION CALCULATION METHOD

On behalf of the MRP Permittees, the Bay Area Stormwater Management Agencies Association (BASMAA) conducted a regional Stressor/Source Identification Project (SSID) for PCBs from electrical utilities in the San Francisco Bay Area.¹ While AMP was not one of the three municipally owned electrical utilities in the MRP area that participated in the project, AMP's OFEE PCBs load reductions are calculated using the methods and assumptions presented in Section 4.0 of this BASMAA report. In accordance with the BASMAA analysis, all equipment that was installed or purchased prior to 1985 (i.e., pre-1985 OFEE) were assumed to potentially contain PCBs.

¹ Located here: https://basmaa.org/wp-content/uploads/2021/04/basmaa-elec-utility-ssid-report-final_8-20-20.pdf

3. OFEE REMOVED AND LOADS AVOIDED

In Fiscal Year (FY) 2023/24, AMP removed five transformers from service and brought one previously removed switch back into service. AMP also found lab results for six transformers that were removed from service before 2022 that had PCBs concentrations >1 ppm. These six transformers were previously reported as containing PCBs at <1 ppm. The FY 2023/24 status changes of AMP OFEE are summarized in Table 1. The updated AMP inventory of PCBs-containing OFEE is provided in Attachment 1.

Table 1: Status of AMP OFEE at the End of FY 2023/24 and Updated PCBs Concentrations

CO ID.	Purchase Date	Removal Year	OFEE Type	Oil (gals)	PCBs (ppm)
<i>OFEE Brought Back Into Service in FY 2023/24</i>					
1095	1980	-	Switch 3WAY 15KV PD Motorized Provision	280	<1
<i>Removed or Scrapped OFEE in FY 2023/24</i>					
1416	1981	2024	XFMR Pad mt. 75KVA 3PH 208/120V	60	<1
1508	1979	2023	XFMR Pad mt. 37.5KVA 1PH 240/120V	40	<1
1761	1981	2023	XFMR Pad mt. 25KVA 1PH 240/120V	40	<1
9050 ¹	Unknown	2024	XFMR Pad mt. 75KVA 3PH 208/120V	(100)	<1
1492 ²	1980	Not provided	XFMR Pad mt. 50KVA 1PH 240/120V	60	<1
<i>Updated OFEE PCBs Concentrations</i>					
1430	1986	2021	XFMR Pad mt. 150KVA 3PH 480/277V	173	8.59
2355	Pre-1985	2019	XFMR Pole mt. 37.5KVA 1PH 120/240V	20	12.98
2624	Pre-1985	Not provided	XFMR Pole mt. 37.5KVA 1PH 120/240V	20	1.54
2742	Pre-1985	2020	XFMR Pole mt. 10KVA 1PH 120/240V	10	2.03
3007	Pre-1985	2019	XFMR Pole mt. 10KVA 1PH 120/240V	10	5.85
3374	Pre-1985	2017	XFMR Pole mt. 25KVA 1PH 120/240V	15	120.13

¹ Documented as removed in 2024, but unknown oil age. Oil capacity assumed equal to similar OFEE in the AMP inventory (similar meaning same kVA rating and secondary voltage).

² Status changed to “removed” at the end of FY2023/24, but removal year not provided.

OFEE PCBs load reductions were calculated using the methods and assumptions presented in the *Mercury and PCBs Control Measures - 2023 Update* and the BASMAA study. AMP OFEE inventory included four equipment types: single-phase and three-phase padmount transformers, poletop transformers, and padmount switches. AMP provided the purchase year, installation date, removal date, measured PCBs concentrations and oil capacity for most of their active and removed OFEE (Attachment 1). The oil volume and PCBs concentrations were used in the load reduction calculations whenever available. The following additional assumptions and approaches were made based on AMP inventory data:

- PCBs concentrations labeled “<1 ppm” were assumed to equal 1 ppm.

- Unknown oil volume for individual OFEE was assumed equal to the oil volume of similar OFEE in the AMP inventory (similar meaning same equipment type, kVA (1,000 volt-amps) rating, secondary voltage, and manufacturer).
- OFEE brought back into service are re-categorized as active instead of removed.
- “Stock” or “reserved” equipment without a purchase year are not included in the analysis, assuming that they were more likely purchased after 1985.

The potential mass of PCBs in pre-1985 OFEE was calculated from the mass of oil in these OFEE multiplied by the OFEE’s measured PCBs concentration or range of assumed PCBs concentrations when the concentration was unknown (see Section 4.2.1 of the BASMAA report for assumed ranges).

Table 2 below summarizes the estimated loads avoided resulting from the removal of PCBs-containing OFEE through maintenance programs and system upgrades prior to 2002, for the period 2002 to June 30, 2022, and for each of the subsequent fiscal years. The low end of the mass range for an OFEE category is the sum using the minimum values for assumed PCBs. The high end of the range is the sum using the maximum values for assumed PCBs. During FY 2023/24, three pre-1985 OFEE were removed from AMP’s system resulting in a 0.5-gram PCBs reduction in AMP’s inventory.

Table 2: Estimated Potential Mass of PCBs in Alameda Municipal Power’s OFEE Inventory

OFEE Category	No. of Pre-1985 OFEE	PCBs (kg)
All Active	496	0.13
All Removed	212	0.091 - 0.096
Removed prior to 2002	2	0.0001
Removed 2002 to June 2022	192	0.086 - 0.090
Removed FY 2022/23	12	0.0036
Removed FY 2023/24	3	0.0005
Removal year not provided	3	0.0010
Unknown oil age	121	0.08 - 0.44
Total	829	0.305 - 0.671

Table 3 below summarizes the estimated loads to stormwater avoided. This calculation assumes 0.05% of PCBs mass leaks from OFEE each year and 99% of the materials leaked are cleaned up such that only 1% remain on erodible surface and are available for wash off, in accordance with the BASMAA report.

Table 3: Estimated PCBs Loads to Stormwater from Alameda Municipal Power’s OFEE Inventory

OFEE Category	PCBs Stormwater Loads (mg/yr)		
All Active OFEE	0.66		
All Active OFEE (includes active “Unknown oil age” OFEE)	0.98	-	1.78
All Removed OFEE	0.46	-	0.48
Removed Prior to 2002	0.001		
Removed 2002 to June 2022	0.43	-	0.45
Removed FY 2022/23	0.02		
Removed FY 2023/24	0.002		
Removal Year Not Provided	0.005		
All Removed OFEE (includes removed “Unknown oil age” OFEE)	0.55	-	1.6
Unknown Oil Age (includes known active and removed status)	0.41	-	2.2
Total	1.53	-	3.35

* * * * *

Attachment 1
Alameda Municipal Power Oil-Filled Electrical
Equipment Inventory through June 2024

PCBs in Electrical Utilities Management Program - 2024 AMP Load Reductions
Attachment 1: AMP's 2024 PCBs-Containing OFEE Inventory

ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	0484	77J549226	150	WH	208/120	3	PAD	<1	MINERAL OIL	150	1977	IN SERVICE	4/11/1979	SERVICE MAP SHOWS T-185 AND DATA BASE /SINGLE LINE SHOWS L-185 NEED FIELD VERIFICATION
TRANSFORMER	0486	PAJ1387	300	STD	208/120	3	PAD	<1	MINERAL OIL	225	1969	IN SERVICE	12/16/1985	
TRANSFORMER	0487	J935037T72A	112.5	GE	208/120	3	PAD	<1	MINERAL OIL	75	1972	IN SERVICE	12/30/1974	
TRANSFORMER	0491	PAJ1386	300	STD	208/120	3	PAD	1	MINERAL OIL	225	1969	SCRAPPED OR SOLD	1/7/2014	LIVE FRONT
TRANSFORMER	0492	78JH787081	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1978	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	0506	80JC175270	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1980	IN SERVICE	11/13/1980	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	0507	79JL088061	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	11/13/1980	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	0517	L851017YFLA	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1975	IN SERVICE	8/11/1976	
TRANSFORMER	0530	836002718	75	RTE	208/120	3	PAD	<1	MINERAL OIL	100	1983	IN SERVICE	10/10/1983	
TRANSFORMER	0535	80JC171050	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1980	IN SERVICE	11/13/1980	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	0581	L445043T73A	500	GE	480/277	3	PAD	<1	MINERAL OIL	250	1974	IN SERVICE	11/24/1993	
TRANSFORMER	1006	H891125M69A	25	GE	120/240	1	PAD	<1	MINERAL OIL	40	1969	SCRAPPED OR SOLD	3/27/2013	LIVE FRONT FROM LT 520. DRAINED & READY FOR SCRAP. OLD XFMR FROM BUREAU OF ELECT. THAT'S FADED SO BAD THAT IT LOOKS YELLOW
TRANSFORMER	1007	L191896T73	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1973	IN SERVICE	4/10/1975	
TRANSFORMER	1008	3067622083	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	2/12/1985	
TRANSFORMER	1010	78JH789284	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	25	1978	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1012	78JH789267	37.5	WH	120/240	1	PAD	<1	MINERAL OIL	40	1978	IN SERVICE	5/7/1979	
TRANSFORMER	1023	M592776TBRA	75	GE	480/277	3	PAD	<1	MINERAL OIL	100	1979	IN SERVICE	10/31/1979	
TRANSFORMER	1032	N180925YLSA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1979	IN SERVICE		NEED FIELD VERIFY. MISSING SERIAL NUMBER. WE FIND S/N FROM SOLD FOR JUNK LIST
TRANSFORMER	1035	H896814M70A	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1970	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP. LT-525 WORKING BUT ITS REALLY OLD, FAED AND PAINT CHIPS ALL OVER (DIRT YARD
TRANSFORMER	1036	J820142M71A	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	10	1971	IN SERVICE		
TRANSFORMER	1042	L851015YFLA	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1975	SCRAPPED OR SOLD	12/9/2020	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1044	H891126M69A	25	GE	120/240	1	PAD	<1	MINERAL OIL	40	1969	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP. LIVE FRONT FROM LT-523. OLD XFMR FROM BUREAU OF ELECT. STARTING TO TURN YELLOW.
TRANSFORMER	1046	H42143467M	150	GE	208/120	3	PAD	<1	MINERAL OIL	150	1968	IN SERVICE	5/6/1971	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1051	K852423T72A	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1973	IN SERVICE	2/7/1974	
TRANSFORMER	1052	K807475Y72A	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	10	1972	IN SERVICE	10/11/1973	
TRANSFORMER	1056	K852420T72A	50	GE	120/240	1	PAD	8	MINERAL OIL	60	1973	SCRAPPED OR SOLD	2/5/2016	8 PPM PCB. FROM LT-539 3458 CAPELLA
TRANSFORMER	1057	K531907M71A	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1971	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1058	K786083Y72A	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1972	SCRAPPED OR SOLD	12/9/2020	
TRANSFORMER	1059	L456360T74A	75	GE	208/120	3	PAD	4	MINERAL OIL	100	1974	IN SERVICE	6/10/1975	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1065	74F758123	225	WH	208/120	3	PAD	19	MINERAL OIL	175	1974	SCRAPPED OR SOLD	12/1/2016	
TRANSFORMER	1073	79JB914048	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	5/12/1993	
SWITCH	1077	79143A	2WAY	TRA		3	PAD	<1	MINERAL OIL	280	1980	SCRAPPED OR SOLD	11/4/2020	
TRANSFORMER	1078	77K576323	25	WH	120/240	1	PAD	<1	MINERAL OIL	40	1977	IN SERVICE	10/23/1979	
TRANSFORMER	1079	J815621M70A	75	GE	208/120	3	PAD	4	MINERAL OIL	100	1970	IN SERVICE	12/15/1992	
TRANSFORMER	1081	K786082Y72A	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1972	SCRAPPED OR SOLD	6/24/2020	
TRANSFORMER	1082	M599188TFRA	150	GE	208/120	3	PAD	<1	MINERAL OIL	150	1979	IN SERVICE	8/29/1996	
TRANSFORMER	1083	K852421T72A	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1973	REMOVED	8/19/2020	
TRANSFORMER	1084	H896785M70A	25	GE	120/240	1	PAD	<1	MINERAL OIL	40	1970	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP. BOE LT-526 REALLY OLD XFMR BUT STILL WORKING FADED TO MULTI-COLOR
TRANSFORMER	1086	83VG533003	25	ME	120/240	1	PAD	3	MINERAL OIL	40	1983	IN SERVICE	6/27/1985	
TRANSFORMER	1087	61SD816	100	WH	120/240	1	POLE	<1	MINERAL OIL	40	1961	OK TO SCRAP	11/3/2017	ACCOUNTING REPORTING
SWITCH	1089	8067A	3WAY	TRA		3	PAD	<1	MINERAL OIL	280	1980	IN SERVICE	5/14/1984	

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ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	1093	83JE947131	37.5	WH	120/240	1	PAD	<1	MINERAL OIL	40	1983	IN SERVICE	1/21/1988	
TRANSFORMER	1094	77M616051	25	WH	120/240	1	PAD	<1	MINERAL OIL	40	1978	IN SERVICE	5/29/1981	
SWITCH	1095	79145B	3WAY	TRA		3	PAD	<1	MINERAL OIL	280	1980	REMOVED	5/22/2020	
SWITCH	1095	79145B	3WAY	TRA		3	PAD	<1	MINERAL OIL	280	1980	IN SERVICE	2/13/1980	
TRANSFORMER	1099	80JC189181	112.5	WH	208/120	3	PAD	<1	MINERAL OIL	150	1980	IN SERVICE	8/25/1981	
TRANSFORMER	1107	3067620183	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	2/12/1985	
TRANSFORMER	1110	79JK083082	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE		
TRANSFORMER	1111	K852422T72A	50	GE	120/240	1	PAD	25	MINERAL OIL	60	1973	SCRAPPED OR SOLD	1/8/2014	RECE'D DOWN CARD ON 12/23/2013. 25 PPM DID NOT TEST - JUNK
TRANSFORMER	1112	83JE950024	25	WH	120/240	1	PAD	<1		40	1983	IN SERVICE	10/9/1986	
TRANSFORMER	1115	80JC175268	37.5	GE	120/240	1	PAD	3		40	1980	IN SERVICE	2/5/1982	
TRANSFORMER	1118	73VB005002	50	ME	120/240	1	PAD	<1		60	1973	SCRAP	9/27/2023	IN SERVICE 2/7/1974, REMOVED 2/1/2023
TRANSFORMER	1125	79JK085126	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	6/30/1981	
TRANSFORMER	1126	N003766TMRA	150	GE	480/277	3	PAD	<1	MINERAL OIL	150	1979	REMOVED	3/21/2023	RETURNED 2/23/2023 (ORIGINAL INSTALL 4/7/2023) EBMUD JOB
TRANSFORMER	1127	79JK083053	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	1/2/1981	
TRANSFORMER	1128	L169883T73	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1973	IN SERVICE	11/7/1978	
TRANSFORMER	1129	80JC171010	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1980	IN SERVICE	12/16/2009	
TRANSFORMER	1130	J820141M71A	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	10	1971	REMOVED	3/12/2019	
TRANSFORMER	1132	J820908M71A	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1971	IN SERVICE	8/11/1971	
TRANSFORMER	1137	73VB005001	50	ME	120/240	1	PAD	<1	MINERAL OIL	60	1973	SCRAPPED OR SOLD	10/17/2017	
TRANSFORMER	1138	816002055	225	RTE	480/277	3	PAD	<1	MINERAL OIL	175	1981	IN SERVICE		
TRANSFORMER	1139	H896786M70A	25	GE	120/240	1	PAD	<1	MINERAL OIL	40	1970	IN SERVICE	10/23/1970	
TRANSFORMER	1140	80JC171075	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1980	IN SERVICE	5/5/1983	
TRANSFORMER	1141	K856331T73A	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1973	IN SERVICE	1/31/1983	
TRANSFORMER	1144	L191897T73	50	GE	120/240	1	PAD	<1		60	1973	IN SERVICE	3/8/1976	
TRANSFORMER	1145	L443683T73A	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1973	IN SERVICE	10/26/1984	
SWITCH	1146	79143C	2WAY	TRA		3	PAD	<1	MINERAL OIL	280	1980	SCRAPPED OR SOLD	2/5/2016	AS PER JIM MCANALLY
TRANSFORMER	1149	G740774-67	75	GE	120/240	1	PAD	<1	MINERAL OIL	40	1967	REMOVED	3/14/2019	
TRANSFORMER	1152	J820907M71A	50	GE	120/240	1	PAD	<1		60	1971	IN SERVICE	4/12/1971	
TRANSFORMER	1153	H896813M70A	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1970	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP. LT-524 WORKING, BUT ITS REALLY OLD. FADED WITH PAINT CHIPS & SCRATCHES. (DIRT YARD)
TRANSFORMER	1155	673154679	45	HOW	208/120	3	PAD	<1	MINERAL OIL	60	1980	IN SERVICE		
TRANSFORMER	1160	J935038T72A	112.5	GE	208/120	3	PAD	<1	MINERAL OIL	75	1972	SCRAPPED OR SOLD	3/27/2013	10-CA OIL L-97. SEVERE RUST ON THE BOTTOM OF XFMR. A BIG CHUNK MISSING FROM THE CORNOR DURE TO RUST. SHOULD BE SCRAPPED SINCE WE DO NOT CARRY THIS SIZE.
TRANSFORMER	1163	836006297!	150	RTE	208/120	3	PAD	<1	MINERAL OIL	150	1983	IN SERVICE	7/24/1984	
TRANSFORMER	1164	N003729TLRA	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1979	IN SERVICE	6/21/1982	BLDG. 43 & 45 (SEWAGE AND CHIEFS HUT)
TRANSFORMER	1165	L453287T74A	225	GE	208/120	3	PAD	<1	MINERAL OIL	175	1974	IN SERVICE	7/2/1994	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1169	79JL088118	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	SCRAPPED OR SOLD	12/17/2013	LT-550 LEAKING FROM BUSHING. SCRAP
TRANSFORMER	1173	821000921	50	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	REMOVED	7/31/2021	UEL-99965 (ALAMEDA MARINA)
TRANSFORMER	1174	H858878K69A	75	GE	120/240	1	POLE	<1	MINERAL OIL	30	1969	SCRAPPED OR SOLD	6/24/2020	ACCOUNTING REPORTING
TRANSFORMER	1175	L453638T74A	300	GE	208/120	3	PAD	<1	MINERAL OIL	225	1974	IN SERVICE	5/23/2001	FIELD VERIFY BY JIM MCRORY ON 11/20/2006.
TRANSFORMER	1176	80JC189157	112.5	WH	208/120	3	PAD	<1	MINERAL OIL	150	1980	IN SERVICE	4/17/1981	
TRANSFORMER	1179	H858879K69A	75	GE	120/240	1	POLE	<1	MINERAL OIL	30	1969	SCRAPPED OR SOLD	6/24/2020	ACCOUNTING REPORTING
TRANSFORMER	1186	3048000383	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	9/28/1982	
TRANSFORMER	1188	K860156T72A	500	GE	480/277	3	PAD	<1	MINERAL OIL	240	1972	IN SERVICE	10/7/1998	
TRANSFORMER	1192	81JK561008	75	WH	120/240	1	PAD	<1	MINERAL OIL	40	1981	IN SERVICE	12/3/1982	
TRANSFORMER	1195	79JK085119	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	5/11/1993	

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ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	1197	3088070384	50	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1984	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1198	3067630883	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	2/11/2002	ADD IN SINGLE LINE
TRANSFORMER	1235	L722140TFNA	1000	GE	480/277	3	PAD	<1	MINERAL OIL	500	1977	SCRAPPED OR SOLD	6/24/2020	ACCOUNTING REPORTING
TRANSFORMER	1242	3067620483	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	9/28/1984	
TRANSFORMER	1255	H839414K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	IN SERVICE	3/10/1969	
TRANSFORMER	1256	6206424	10	LM	120/240	1	POLE	<1	MINERAL OIL	10	1964	IN SERVICE		NEED FIELD VERIFY. MISSING SERIAL NUMBER
TRANSFORMER	1265	67AK6368	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1968	IN SERVICE	9/5/1968	ADD IN SINGLE LINE
TRANSFORMER	1269	80JG26618	225	WH	480/277	3	PAD	<1	MINERAL OIL	175	1980	IN SERVICE	7/14/1999	ENGG V/S DISPATCH IS NOT MATCH SERIAL NUMBER. (ENGG. DATABASE S/N 80JG26618 V/S DISPATCH DATABASE S/N A11E510KPT) NEED FIELD VERIFY
TRANSFORMER	1270	72J310134	75	WH	208/120	3	PAD	2.2	MINERAL OIL	100	1972	SCRAPPED OR SOLD	1/7/2014	MOTEL CANNOT GET SW 'B'
TRANSFORMER	1273	L169882T73A	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1973	IN SERVICE	5/23/1974	
TRANSFORMER	1274	J815622M70A	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1970	IN SERVICE	10/13/1970	
SWITCH	1278	8066B	2WAY	TRA		3	PAD	<1	MINERAL OIL	280	1980	IN SERVICE	3/20/1989	
SWITCH	1291	79143B	2WAY	TRA			PAD		MINERAL OIL	355		SCRAPPED OR SOLD	11/30/2012	
TRANSFORMER	1296	68AA7279	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1969	IN SERVICE	12/6/1969	
TRANSFORMER	1297	3067622483	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	SCRAPPED OR SOLD	10/17/2017	
TRANSFORMER	1298	78K824233	150	WH	480/277	3	PAD	<1	MINERAL OIL	150	1978	IN SERVICE	9/15/1999	
TRANSFORMER	1301	B406001	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1951	IN SERVICE	5/2/1994	ADD IN SINGLE LINE
TRANSFORMER	1307	H858551K69A	15	GE	120/240	1	POLE	<1	MINERAL OIL	10	1969	IN SERVICE	5/6/1998	
TRANSFORMER	1308	H858553K69	15	GE	120/240	1	POLE	<1	MINERAL OIL	10	1969	IN SERVICE	4/28/2014	XFMR REMOVE DUE TO RELOCATION ELECTRICAL FACILITIES AT POGGI ST
TRANSFORMER	1309	69VJ003039	10	MCG CP	120/240	1	PAD	<1	MINERAL OIL	10	1969	IN SERVICE	8/27/1996	FIELD VERIFY BY JIM MCRORY ON 11/20/2006.
TRANSFORMER	1311	H858556K69A	15	GE	120/240	1	POLE	<1	MINERAL OIL	10	1969	SCRAPPED OR SOLD	6/24/2020	ACCOUNTING REPORTING
TRANSFORMER	1313	811153149	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	IN SERVICE	5/7/2014	XFMR REMOVE DUE TO RELOCATION ELECTRICAL FACILITIES AT POGGI ST
TRANSFORMER	1316	77A142303	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1979	IN SERVICE	6/13/1991	
TRANSFORMER	1324	76A354102	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1976	IN SERVICE	6/13/1991	
TRANSFORMER	1325	76A354100	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1976	IN SERVICE	6/13/1991	
TRANSFORMER	1332	82VL022008	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	8/16/1988	
TRANSFORMER	1333	77VC505004	37.5	ME	120/240	1	POLE	<1		20	1977	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1337	67L7797	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1967	IN SERVICE		ADD IN SINGLE LINE
TRANSFORMER	1344	64SJ313	100	WH	120/240	1	POLE	<1	MINERAL OIL	40	1964	SCRAPPED OR SOLD	3/27/2013	LEAKING OIL FORM TOP COVER SEAL TOP SEAL GASKET IRREPAIRABLE.
TRANSFORMER	1347	58SB42	167	WH	120/240	1	POLE	<1	MINERAL OIL	70	1958	SCRAPPED OR SOLD	6/24/2020	ACCOUNTING REPORTING
TRANSFORMER	1348	58SF0456	167	WH	120/240	1	POLE	<1	MINERAL OIL	70	1958	IN SERVICE	3/9/2005	
TRANSFORMER	1350	59SJ1738	100	WH	120/240	1	POLE	<1	MINERAL OIL	40	1959	IN SERVICE	12/29/2000	ADD IN SINGLE LINE.
TRANSFORMER	1352	74AK17139	25	WH	120/240	1	PAD	<1	MINERAL OIL	15	1974	IN SERVICE	8/27/1996	FIELD VERIFY BY JIM MCRORY ON 11/20/2006.
TRANSFORMER	1357	74AC11123	250	WH	120/240	1	POLE	<1	MINERAL OIL	75	1974	SCRAPPED OR SOLD	6/6/2014	ESNA PRIMARY BUSHINGS RECOMMENDED FOR SCRAP
TRANSFORMER	1391	81JJ535201	25	WH	120/240	1	PAD	<1	MINERAL OIL	40	1984	SCRAPPED OR SOLD	1/7/2014	FOR DISPOSAL
TRANSFORMER	1392	821080451	25	RTE	120/240	1	PAD	<1	MINERAL OIL	40	1982	SCRAPPED OR SOLD	1/7/2014	TESTED BY GOW ON 8/25/2011 - FAIL, SCRAP SEC SW INOP
TRANSFORMER	1393	81JJ535159	25	WH	120/240	1	PAD	<1	MINERAL OIL	40	1984	IN SERVICE	3/20/1998	
TRANSFORMER	1394	821080450	25	RTE	120/240	1	PAD	<1	MINERAL OIL	40	1982	IN SERVICE	12/8/1999	
TRANSFORMER	1400	82A212906	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1984	IN SERVICE	8/30/1986	
TRANSFORMER	1401	83A442495	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	8/29/1986	
TRANSFORMER	1402	83A442496	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	1/21/1986	
TRANSFORMER	1411	H894999M69A	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1970	SCRAPPED OR SOLD	10/17/2017	AS PER MICHAEL RU EMAIL ON 12/16/2016REMOVE T-255 AND IN SERVICE L-255 120/208 XFMR

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TRANSFORMER	1416	81D2158401	75	HDD	208/120	3	PAD	<1	MINERAL OIL	60	1981	REMOVED	5/16/2024	IN SERVICE 12/12/2002, 2NDARY FED FROM L-1431
TRANSFORMER	1419	74E741033	150	WH	208/120	3	PAD	<1	MINERAL OIL	150	1974	IN SERVICE	8/28/1988	
TRANSFORMER	1420	82A212910	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE		
TRANSFORMER	1421	64SL119	100	STD	120/240	1	POLE	<1	MINERAL OIL	40	1964	IN SERVICE	3/29/2005	
TRANSFORMER	1422	82VL022007	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	9/4/1985	
TRANSFORMER	1423	3067622683	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	4/24/1985	
TRANSFORMER	1425	3067620683	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	4/1/1985	
TRANSFORMER	1426	82A212908	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1984	IN SERVICE	2/11/1986	
TRANSFORMER	1427	J747807K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1970	IN SERVICE	2/11/1986	
TRANSFORMER	1428	74E726033	150	WH	208/120	3	PAD	<1	MINERAL OIL	150	1974	IN SERVICE	1/2/1990	
TRANSFORMER	1430	851062A-2	150	SQD	480/277	3	PAD	8.59	MINERAL OIL	173	1986	REMOVED	2/23/2021	
TRANSFORMER	1438	84JH246124	167/10	WH	240/120	3	PAD	<1	MINERAL OIL	150	1984	IN SERVICE	8/15/1995	
TRANSFORMER	1440	84JH246200	167/10	WH	240/120	3	PAD	<1	MINERAL OIL	150	1984	IN SERVICE	9/30/1995	
TRANSFORMER	1441	83JF964016	167/10	WH	240/120	3	PAD	<1	MINERAL OIL	150	1983	IN SERVICE	9/30/1995	
TRANSFORMER	1442	76E230003	167	WH	120/240	1	PAD	<1	MINERAL OIL	90	1976	IN SERVICE	4/10/2007	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1451	84JH239220	500	WH	480/277	3	PAD	<1	MINERAL OIL	250	1984	IN SERVICE	9/17/2000	
TRANSFORMER	1456	85JL564189	750	WH	480/277	3	PAD	0	MINERAL OIL	400	1985	SCRAPPED OR SOLD	1/7/2014	LEAKING PRI SW. TRANSFORMER IS NOT TAGGED WITH SPECIFIC PROBLEM. REMOVED FROM L899. PAINT DISCOLORED & FAIDED.
TRANSFORMER	1461	S-55F1561	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1955	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1462	83VG533002	25	ME	120/240	1	PAD	<1	MINERAL OIL	40	1983	IN SERVICE	9/28/1988	
TRANSFORMER	1465	83VG533001	25	ME	120/240	1	PAD	<1	MINERAL OIL	40	1983	IN SERVICE	7/21/1987	
TRANSFORMER	1467	K467014K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	REMOVED	11/6/2019	
TRANSFORMER	1469	81JD435037	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1981	IN SERVICE	2/28/1984	
TRANSFORMER	1472	69F012420	37.5	WH	120/240	1	PAD	<1	MINERAL OIL	40	1969	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP. LIVE FRONT FROM LT 519 OLD XFMR FROM BOE WITH PAINT TURNING YELLOW
TRANSFORMER	1473	83VH507001	50	ME	120/240	1	PAD	<1	MINERAL OIL	60	1983	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP.
TRANSFORMER	1476	83VG534002	37.5	ME	120/240	1	PAD	<1	MINERAL OIL	40	1984	IN SERVICE	12/4/1985	
TRANSFORMER	1477	83VG534005	37.5	ME	120/240	1	PAD	<1		40	1983	IN SERVICE	4/1/1992	
SWITCH	1478	79144B	3WAY	TRA			PAD	0	MINERAL OIL	355		SCRAPPED OR SOLD	11/30/2012	
TRANSFORMER	1480	79C932078	75	WH	480/277	3	PAD	<1	MINERAL OIL	100	1979	IN SERVICE	2/13/1980	
TRANSFORMER	1481	L851016YFLA	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1975	IN SERVICE	5/16/2001	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1488	79JK081156	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1979	IN SERVICE	5/21/1980	
TRANSFORMER	1489	79JL088075	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	6/21/2011	
TRANSFORMER	1490	79JK081135	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1979	SCRAPPED OR SOLD	6/6/2014	
TRANSFORMER	1491	78JH787035	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1978	IN SERVICE	11/17/1979	
TRANSFORMER	1492	79JL088049	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1980	REMOVED	6/21/1995	Oil leak seondary service, targeted for refurbishment IN SERVICE 6/21/1995,
TRANSFORMER	1494	L457309T74A	500	GE	480/277	3	PAD	<1	MINERAL OIL	250	1974	IN SERVICE	10/12/2001	
TRANSFORMER	1496	L460480T74A	225	GE	208/120	3	PAD	<1	MINERAL OIL	175	1974	IN SERVICE	11/8/1978	
TRANSFORMER	1498	L833067YDLA	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1975	IN SERVICE		
TRANSFORMER	1499	77M616023	25	WH	120/240	1	PAD	<1	MINERAL OIL	40	1978	IN SERVICE	1/26/1995	DISPATCH DATA SHOWS 77H616023, ENG. DATA & AS400 SHOWS S/N 77M616023
TRANSFORMER	1500	L833068YDLA	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1975	IN SERVICE	11/10/1978	
TRANSFORMER	1501	L833069YDLA	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1975	IN SERVICE	10/10/2001	
TRANSFORMER	1502	78JH789275	37.5	WH	120/240	1	PAD	<1	MINERAL OIL	40	1978	IN SERVICE	7/5/1979	
TRANSFORMER	1503	78JH787106	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1978	IN SERVICE	6/4/2009	
SWITCH	1505	L-464088P	2WAY	GE		3	PAD	<1	MINERAL OIL	280	1978	IN SERVICE	2/1/1980	FIELD VERIFY BY JIM MCRORY ON 10/31/2006.
TRANSFORMER	1506	79JK083095	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	3/25/1980	

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ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	1507	79JK083067	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	3/25/1980	
TRANSFORMER	1508	79JK081112	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1979	REMOVED	10/16/2023	IN SERVICE 3/25/1980 - REMOVED FOR OIL LEAK
TRANSFORMER	1510	78JH789255	37.5	WH	120/240	1	PAD	<1	MINERAL OIL	40	1978	IN SERVICE	3/25/1980	
TRANSFORMER	1513	83JE948018	37.5	WH	120/240	1	PAD	<1	MINERAL OIL	40	1983	IN SERVICE	3/6/1985	
TRANSFORMER	1514	83VG534004	37.5	ME	120/240	1	PAD	<1	MINERAL OIL	40	1983	IN SERVICE	3/28/1985	
TRANSFORMER	1516	83VH507003	50	ME	120/240	1	PAD	<1	MINERAL OIL	60	1983	IN SERVICE	8/13/1985	
TRANSFORMER	1517	79JK085142	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1518	79JK085135	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	3/1/1980	
TRANSFORMER	1519	83VG534001	37.5	ME	120/240	1	PAD	<1	MINERAL OIL	40	1983	IN SERVICE	3/29/1984	
TRANSFORMER	1520	84JM331207	75	WH	208/120	3	PAD	<1	MINERAL OIL	100	1984	IN SERVICE	7/1/1985	
TRANSFORMER	1521	84JM331066	75	WH	208/120	3	PAD	<1	MINERAL OIL	100	1984	IN SERVICE	7/1/1985	
TRANSFORMER	1522	81D2158501	75	WH	208/120	3	PAD	<1	MINERAL OIL	60	1981	IN SERVICE	12/18/1984	
TRANSFORMER	1523	83VH507004	50	ME	120/240	1	PAD	<1	MINERAL OIL	60	1983	IN SERVICE	3/25/1985	
SWITCH	1524	7945A	2WAY	TRA		3	PAD	<1	MINERAL OIL	280	1979	IN SERVICE	10/14/2000	
TRANSFORMER	1525	77K577075	25	WH	120/240	1	PAD	<1	MINERAL OIL	40	1977	IN SERVICE	8/8/1979	
TRANSFORMER	1526	84JM331264	75	WH	208/120	3	PAD	<1	MINERAL OIL	100	1984	IN SERVICE	7/12/1985	
TRANSFORMER	1527	78H777332	225	WH	208/120	3	PAD	<1	MINERAL OIL	175	1978	IN SERVICE	8/3/1979	
TRANSFORMER	1533	79JL088108	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	SCRAPPED OR SOLD	10/30/2020	
TRANSFORMER	1534	80JC175263	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1980	SPARE	8/1/2006	THIS XFMR IS NOT IN USE, JUST COVER PAD FOR SAFETY ISSUED. (SPARE)
TRANSFORMER	1535	79JA088090	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	7/7/1980	
TRANSFORMER	1536	80JC175265	37.5	WH	120/240	1	PAD	<1	MINERAL OIL	40	1980	REMOVED	7/9/2020	
TRANSFORMER	1537	81JJ535188	25	WH	120/240	1	PAD	<1	MINERAL OIL	40	1984	IN SERVICE	5/1/2014	
TRANSFORMER	1542	83JE948049	37.5	WH	120/240	1	PAD	<1	MINERAL OIL	40	1983	IN SERVICE	12/14/1983	
TRANSFORMER	1544	83VH508001	75	ME	120/240	1	PAD	<1	MINERAL OIL	60	1984	IN SERVICE	10/4/1985	
TRANSFORMER	1545	83VH507002	50	ME	120/240	1	PAD	<1	MINERAL OIL	60	1983	IN SERVICE	12/17/1984	
TRANSFORMER	1549	83VG534003	37.5	ME	120/240	1	PAD	<1	MINERAL OIL	40	1983	IN SERVICE	1/14/1988	
TRANSFORMER	1550	83VG534006	37.5	ME	120/240	1	PAD	<1	MINERAL OIL	40	1983	IN SERVICE	8/20/1987	
SWITCH	1553	L-464089P	3WAY	GE		3	PAD	<1	MINERAL OIL	280	1978	IN SERVICE	10/29/2007	RESERVED FOR AC
TRANSFORMER	1555	673164679	45	HOW	208/120	3	PAD	<1	MINERAL OIL	60	1980	IN SERVICE	3/13/1980	
TRANSFORMER	1561	84VC508001	75	ME	120/240	1	PAD	<1	MINERAL OIL	60	1984	IN SERVICE	4/2/1990	
TRANSFORMER	1562	836006296	150	RTE	208/120	3	PAD	<1	MINERAL OIL	150	1983	IN SERVICE	5/31/1984	
TRANSFORMER	1563	84JH240241	500	WH	480/277	3	PAD	<1	MINERAL OIL	250	1984	IN SERVICE	11/9/1984	
TRANSFORMER	1565	84ZC901003	750	ME	480/277	3	PAD	<1	MINERAL OIL	400	1984	REMOVED	5/25/2017	
SWITCH	1566	831116045	2WAY	RTE		3	PAD	<1	MINERAL OIL	280	1983	IN SERVICE	2/13/1983	
TRANSFORMER	1567	84ZC901002	750	ME	480/277	3	PAD	<1	MINERAL OIL	400	1984	SCRAPPED OR SOLD	2/5/2016	UP/DOWN CARD ONE COPY TO DISPATCH ON 12/20/2013
TRANSFORMER	1568	84ZC901001	750	ME	480/277	3	PAD	<1	MINERAL OIL	400	1984	IN SERVICE	2/17/2021	UP/DOWN CARD ONE COPY TO DISPATCH ON 12/20/2013
TRANSFORMER	1569	826007024	45	RTE	208/120	3	PAD	<1	MINERAL OIL	60	1982	SCRAPPED OR SOLD	2/24/2012	
SWITCH	1571	831115337	2WAY	RTE		3	PAD	<1	MINERAL OIL	280	1983	IN SERVICE	10/13/2004	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1584	84ZK704001	750	ME	480/277	3	PAD	<1	MINERAL OIL	400	1984	IN SERVICE	5/8/2020	
SWITCH	1585	841137915	2WAY	RTE		3	PAD	<1	MINERAL OIL	280	1984	IN SERVICE	1/15/1985	
TRANSFORMER	1586	80D1957502	500	HDD	480/277	3	PAD	<1	MINERAL OIL	250	1980	IN SERVICE	7/27/1984	
TRANSFORMER	1587	836005708	500	RTE	480/277	3	PAD	<1	MINERAL OIL	250	1983	IN SERVICE	10/1/2001	
TRANSFORMER	1588	826006969	300	RTE	480/277	3	PAD	<1	MINERAL OIL	225	1982	IN SERVICE	8/14/2000	
TRANSFORMER	1589	L453986T74A	500	GE	480/277	3	PAD	<1	MINERAL OIL	250	1974	IN SERVICE	11/21/1996	
TRANSFORMER	1590	L460355T74AA	300	GE	208/120	3	PAD	1	MINERAL OIL	180	1974	SCRAPPED OR SOLD	1/7/2014	BROKEN PRI SW
TRANSFORMER	1591	L453637T74AA	300	GE	208/120	3	PAD	1	MINERAL OIL	180	1974	SCRAPPED OR SOLD	1/7/2014	BROKEN PRI SW
TRANSFORMER	1592	846003342	150	RTE	208/120	3	PAD	1	MINERAL OIL	190	1984	SCRAPPED OR SOLD	1/7/2014	MISSING HV SW HANDLE

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ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	1593	74E731055	75	WH	208/120	3	PAD	<1	MINERAL OIL	60	1974	IN SERVICE	12/13/2006	
TRANSFORMER	1594	L457311T74A	500	GE	480/277	3	PAD	<1		250	1974	IN SERVICE	9/19/2007	
SWITCH	1604	831115336	2WAY	RTE		3	PAD	<1	MINERAL OIL	280	1984	IN SERVICE	10/27/2004	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1605	816007380	150	RTE	480/277	3	PAD	<1	MINERAL OIL	150	1982	IN SERVICE	12/10/1982	
TRANSFORMER	1607	830658-1	45	SQD	208/120	3	PAD	<1	MINERAL OIL	60	1984	IN SERVICE	5/8/1984	
TRANSFORMER	1609	79JK083108	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	SCRAPPED OR SOLD	1/7/2014	
TRANSFORMER	1615	L450057T74A	225	GE	208/120	3	PAD	<1	MINERAL OIL	175	1974	IN SERVICE	5/20/1974	
TRANSFORMER	1621	3067622383	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	2/24/2009	
TRANSFORMER	1623	3067621283	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	SCRAPPED OR SOLD	10/17/2017	
TRANSFORMER	1624	79JK081090	37.5	WH	120/240	1	PAD	<1	MINERAL OIL	40	1979	SCRAPPED OR SOLD	2/5/2016	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1626	830656-1	112.5	SQD	208/120	3	PAD	<1	MINERAL OIL	75	1984	IN SERVICE	5/18/1984	
TRANSFORMER	1631	L457310T74AA	500	GE	480/277	3	PAD	<1	MINERAL OIL	240	1974	SCRAPPED OR SOLD	6/6/2014	EMT TESTED ON 8/28/2011 - FAIL
TRANSFORMER	1632	82A212909	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1984	IN SERVICE	10/15/1992	
TRANSFORMER	1637	69VJ003034	10	ME	120/240	1	POLE	<1	MINERAL OIL	10	1969	REMOVED	1/1/2000	
TRANSFORMER	1651	H858343K69A	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1969	SCRAPPED OR SOLD	10/17/2017	
TRANSFORMER	1652	83JM081065	150	WH	480/277	3	PAD	<1	MINERAL OIL	150	1984	IN SERVICE	12/9/1985	
SWITCH	1657	841137184	2WAY	RTE		3	PAD	<1	MINERAL OIL	280	1984	IN SERVICE	1/30/1988	
TRANSFORMER	1658	72A5046	150	WH	208/120	3	PAD	<1	MINERAL OIL	150	1972	IN SERVICE	6/9/2001	
TRANSFORMER	1661	L456361T74A	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1974	IN SERVICE	5/8/1984	
TRANSFORMER	1671	L456123T74A	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1974	IN SERVICE	10/23/1984	
SWITCH	1676	831115338	2WAY	RTE		3	PAD	<1	MINERAL OIL	280	1983	IN SERVICE	4/22/1986	
TRANSFORMER	1692	70ZL65502	150	ME	208/120	3	PAD	<1	MINERAL OIL	150	1970	IN SERVICE	7/27/2001	
TRANSFORMER	1699	82A212905	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1984	IN SERVICE	3/21/1984	
SWITCH	1703	81JC425255	1WAY	WH		3	PAD	<1	MINERAL OIL	110	1981	IN SERVICE	6/12/1981	
TRANSFORMER	1704	845109A-1	75	SQD	208/120	3	PAD	<1	MINERAL OIL	100	1984	IN SERVICE	11/12/1985	
TRANSFORMER	1706	76E235024	112.5	WH	208/120	3	PAD	<1	MINERAL OIL	75	1976	SCRAPPED OR SOLD	2/28/2012	
TRANSFORMER	1707	83JF963056	167/10	WH	240/120	3	PAD	<1	MINERAL OIL	225	1983	IN SERVICE	12/29/1983	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1708	81JK559036	167	WH	120/240	1	PAD	<1	MINERAL OIL	90	1981	IN SERVICE	8/27/2013	
TRANSFORMER	1710	L952819YFMA	75	GE	120/240	1	PAD	<1	MINERAL OIL	40	1976	IN SERVICE	12/17/1976	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1712	PAJ1384	300	STD	208/120	3	PAD	<1	MINERAL OIL	225	1969	SCRAPPED OR SOLD	1/7/2014	LIVE FRONT REMOVED 4/20/2012
TRANSFORMER	1714	84JH240169	500	WH	480/277	3	PAD	<1	MINERAL OIL	250	1984	IN SERVICE	11/9/1984	
TRANSFORMER	1718	78H777294	300	WH	208/120	3	PAD	<1	MINERAL OIL	225	1978	IN SERVICE	6/21/2000	FIELD VERIFY BY JIM MCRORY ON 11/14/2006.
TRANSFORMER	1720	J935965T72A	300	GE	208/120	3	PAD	<1	MINERAL OIL	225	1972	IN SERVICE	8/29/2002	FIELD VERIFY BY JIM MCRORY ON 11/20/2006.
TRANSFORMER	1721	J932446T71A	500	GE	480/277	3	PAD	<1	MINERAL OIL	250	1972	IN SERVICE	1/31/1972	
TRANSFORMER	1722	J935039T72A	112.5	GE	208/120	3	PAD	<1	MINERAL OIL	75	1972	IN SERVICE	1/14/1974	
TRANSFORMER	1723	74H799038	225	WH	208/120	3	PAD	<1	MINERAL OIL	175	1974	IN SERVICE	9/24/1974	
SWITCH	1725	81JC425254	2WAY	WH		3	PAD	<1	MINERAL OIL	280	1981	IN SERVICE	9/1/1998	FUSE SWITCH SMALL PADESTALL
SWITCH	1725		25					0		280		IN SERVICE		FUSE SWITCH SMALL PADESTALL
TRANSFORMER	1726	J935040T72A	112.5	GE	208/120	3	PAD	<1	MINERAL OIL	75	1972	IN SERVICE	12/2/1975	
TRANSFORMER	1728	816007379	150	RTE	208/120	3	PAD	<1	MINERAL OIL	150	1981	IN SERVICE	4/8/1998	
TRANSFORMER	1732	79C935321	150	WH	208/120	3	PAD	<1	MINERAL OIL	100	1979	IN SERVICE	6/21/1982	FEEDING BLDG. 10 (MSSI)
TRANSFORMER	1734	846003343	150	RTE	208/120	3	PAD	<1	MINERAL OIL	150	1984	IN SERVICE	6/12/1985	FEEDING BLDG. 50 COMMAND CENTER
TRANSFORMER	1735	81D2047001	225	HDD	208/120	3	PAD	<1	MINERAL OIL	175	1981	IN SERVICE	12/30/1982	FEEDING BUILDINGS 51 & 52 (COMMAND CENTER/COMMANDER'S HEADQUARTERS
TRANSFORMER	1736	85JE439226	300	WH	208/120	3	PAD	<1	MINERAL OIL	225	1984	IN SERVICE	6/4/1987	
TRANSFORMER	1741	M596699TERA	225	GE	208/120	3	PAD	<1	MINERAL OIL	175	1979	IN SERVICE	12/30/1980	
TRANSFORMER	1742	836002717	75	RTE	208/120	3	PAD	<1	MINERAL OIL	100	1983	IN SERVICE	11/15/1983	FIELD VERIFY BY JIM MCRORY ON 11/20/2006.
TRANSFORMER	1745	PAJ1388	300	STD	208/120	3	PAD	<1	MINERAL OIL	225		IN SERVICE	6/18/1998	
TRANSFORMER	1746	830654-1	45	SQD	480/277	3	PAD	<1	MINERAL OIL	60	1984	IN SERVICE	3/19/1985	

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TRANSFORMER	1750	79JK081173	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1979	IN SERVICE	12/5/1979	
TRANSFORMER	1751	H889617M68A	150	GE	208/120	3	PAD	<1	MINERAL OIL	50	1968	IN SERVICE	9/2/1969	
TRANSFORMER	1752	866004983	300	RTE	208/120	3	PAD	2	MINERAL OIL	225	1986	IN SERVICE	4/8/1987	FIELD VERIFY BY JIM MCRORY ON 11/20/2006.
TRANSFORMER	1753	PAJ1385	300	STD	208/120	3	PAD	<1	MINERAL OIL	225	1969	IN SERVICE	8/28/1970	
TRANSFORMER	1754	H895222M69A	225	GE	208/120	3	PAD	<1	MINERAL OIL	175	1969	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1758	79JB913269	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	7/3/1980	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1759	73VB005003	50	WH	120/240	1	PAD	1	MINERAL OIL	60	1973	SCRAPPED OR SOLD	1/7/2014	
TRANSFORMER	1760	81JK561124	25	WH	120/240	1	PAD	<1	MINERAL OIL	40	1981	SCRAPPED OR SOLD	2/5/2016	XFMR LEAKING LOC-146
TRANSFORMER	1761	81JK561115	25	WH	120/240	1	PAD	<1	MINERAL OIL	40	1981	REMOVED	12/11/2023	IN SERVICE 1/12/83, REMOVED?
TRANSFORMER	1762	83VG533004	25	ME	120/240	1	PAD	<1	MINERAL OIL	40	1984	IN SERVICE	6/24/1986	
TRANSFORMER	1763	63SG1260	300	WH	208/120	3	PAD	<1	MINERAL OIL	225	1963	SCRAPPED OR SOLD	12/1/2016	
TRANSFORMER	1765	73H550076	75	WH	208/120	3	PAD	<1	MINERAL OIL	100	1974	IN SERVICE	5/8/1987	
TRANSFORMER	1766	77D446116	112.5	WH	208/120	3	PAD	<1	MINERAL OIL	75	1977	IN SERVICE	9/21/1977	
TRANSFORMER	1770	84JE187246	150	WH	480/277	3	PAD	<1	MINERAL OIL	150	1984	SCRAPPED	1/26/2023	IN SERCVICE 12/14/1985
TRANSFORMER	1771	83JM083084	150	WH	208/120	3	PAD	<1	MINERAL OIL	150	1983	IN SERVICE	1/14/1991	
TRANSFORMER	1773	836002624	112.5	RTE	480/277	3	PAD	<1	MINERAL OIL	75	1983	IN SERVICE	9/22/1983	
SWITCH	1779	841137185	2WAY	RTE		3	PAD	<1	MINERAL OIL	280	1984	IN SERVICE	9/1/1987	
TRANSFORMER	1781	836005709	500	RTE	480/277	3	PAD	<1	MINERAL OIL	250	1983	REMOVED	9/10/2016	
TRANSFORMER	1782	84JH240300	500	WH	480/277	3	PAD	<1	MINERAL OIL	250	1984	IN SERVICE	10/2/1986	
TRANSFORMER	1785	77J554067	150	WH	480/277	3	PAD	<1	MINERAL OIL	150	1977	SCRAPPED OR SOLD	10/17/2017	
TRANSFORMER	1786	84JH240271	500	WH	480/277	3	PAD	<1	MINERAL OIL	250	1984	IN SERVICE	8/20/1987	
TRANSFORMER	1787	846003344	150	RTE	208/120	3	PAD	<1	MINERAL OIL	150	1984	IN SERVICE	8/24/1984	
TRANSFORMER	1788	846003340	150	RTE	208/120	3	PAD	<1	MINERAL OIL	150	1984	IN SERVICE	3/14/1996	FIELD VERIFY BY JIM MCRORY ON 10/31/2006.
TRANSFORMER	1790	826007061	75	RTE	480/277	3	PAD	<1	MINERAL OIL	100	1983	REMOVED	2/12/2020	
TRANSFORMER	1792	87ZK556-002	500	ME	480/277	3	PAD	<1	MINERAL OIL	250		IN SERVICE	6/30/2001	
TRANSFORMER	1795	84JM332057	75	WH	208/120	3	PAD	<1	MINERAL OIL	100	1984	IN SERVICE	7/22/1986	
TRANSFORMER	1800	M332550YJNA	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1977	SCRAPPED OR SOLD	6/24/2020	
TRANSFORMER	1801	M273755YHNA	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	9/8/1981	NEED VERIFY XFMR INFO. MISSING SERIAL NUMBER
TRANSFORMER	1802	77A142380	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1978	IN SERVICE	7/29/1981	
TRANSFORMER	1803	77A142387	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE		ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	1804	M338234YJNA	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	8/14/1981	
TRANSFORMER	1805	67AF13950	75	WH	120/240	1	POLE	<1	MINERAL OIL	15	1967	IN SERVICE	1/3/1984	ADD IN SINGLE LINE
TRANSFORMER	1817	M332548YJNA	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1977	IN SERVICE	12/20/1977	ADD IN SINGLE LINE
TRANSFORMER	1821	77A142385	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1978	IN SERVICE	7/29/1981	
TRANSFORMER	1823	M273758YNHA	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	6/2/1981	
TRANSFORMER	1824	19857-978	37.5	HOW	120/240	1	POLE	<1	MINERAL OIL	20	1979	IN SERVICE	9/23/1980	
TRANSFORMER	1825	M530043YFPA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1978	IN SERVICE	3/17/1981	
TRANSFORMER	1827	L647647K74A	25	GE	240/480	1	POLE	<1	MINERAL OIL	15	1974	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP
TRANSFORMER	1830	M273752YHNA	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	7/14/1981	
TRANSFORMER	1831	C52039	37.5	KUH	240/480	1	POLE	<1	MINERAL OIL	20	1956	SCRAPPED OR SOLD	3/27/2013	DRAINED READY FOR SCRAP. TAGGED FOR SCRAP IN 2009
TRANSFORMER	1832	C50238	37.5	KUH	240/480	1	POLE	<1	MINERAL OIL	20	1956	SCRAPPED OR SOLD	3/27/2013	DRAINED READY FOR DISPOSAL. TAGGED FOR SCRAP IN 2009
TRANSFORMER	1838	M273753YHNA	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	3/24/1981	
TRANSFORMER	1839	175804K73A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1973	REMOVED	9/17/2019	
TRANSFORMER	1842	79A044405	50	WH	240/480	1	POLE	<1	MINERAL OIL	10	1979	REMOVED	2/17/2022	(IN SERVICE FROM 3/31/2003) UEL-99965 - OH TO UG CONVERSION (POLE ABANDONMENT)
TRANSFORMER	1843	79A044404	50	WH	240/480	1	POLE	<1	MINERAL OIL	10	1979	REMOVED	2/17/2022	(IN SERVICE FROM 3/31/2003) UEL-99965 - OH TO UG CONVERSION (POLE ABANDONMENT)
TRANSFORMER	1845	K508712K72A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1973	REMOVED	3/5/2021	REMOVE BY MIKE SHERMAN

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PCBs in Electrical Utilities Management Program - 2024 AMP Load Reductions
Attachment 1: AMP's 2024 PCBs-Containing OFEE Inventory

ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	1846	J783677K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE	10/28/1971	
TRANSFORMER	1851	79A044403	50	WH	240/480	1	POLE	<1	MINERAL OIL	10	1979	SCRAPPED OR SOLD	3/27/2013	DRAINED READY FOR SCRAP. BLACK BURNT MARKED AREA ON SECONDARY BUSHING.
TRANSFORMER	1853	J785917K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE	9/30/1993	
TRANSFORMER	1853	J785917K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE		
TRANSFORMER	1855	72AB1950	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1972	IN SERVICE	4/4/1972	
TRANSFORMER	1856	58SL1774	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1959	IN SERVICE	10/6/1980	
TRANSFORMER	1857	175803K73A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1973	IN SERVICE	7/14/1981	
TRANSFORMER	1858	K467738K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE	2/28/1972	
TRANSFORMER	1860	J784925K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE	10/28/1971	
TRANSFORMER	1861	58SF90	100	WH	120/240	1	POLE	<1	MINERAL OIL	40	1958	OK TO SCRAP	11/3/2017	ACCOUNTING REPORTING
TRANSFORMER	1862	J786176K71A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1971	IN SERVICE	10/26/1971	
TRANSFORMER	1864	73AL22042	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1974	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1865	J786179K71A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1971	SCRAPPED OR SOLD	3/27/2013	DRAINED. READY FOR SCRAP. BUSHING LEAKING UNDER LOAD. CSP STYLE. MINOR SCRATCHES & CHIPS W/RUST. RECOMMENDED FOR SCRAP.
TRANSFORMER	1870	J786180K71A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1971	SCRAPPED OR SOLD	2/28/2012	
TRANSFORMER	1871	503192378	50	HOW	120/240	1	POLE	<1	MINERAL OIL	25	1979	IN SERVICE	10/21/1981	
TRANSFORMER	1872	71AK15337	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1972	IN SERVICE	4/4/1972	
TRANSFORMER	1873	J768459K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE	10/26/1992	
TRANSFORMER	1874	83A523383	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1984	IN SERVICE	1/16/1985	
TRANSFORMER	1875	J784925K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE		NEED FIELD VERIFY. MISSING SERIAL NUMBER
TRANSFORMER	1877	3067621983	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	3/21/1985	
TRANSFORMER	1878	77A020750	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1977	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1880	J785916K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE	8/21/1989	Leak UEL 1266 used for replacing with 37.5kVA
TRANSFORMER	1883	2109102	15	AC	120/240	1	POLE	<1	MINERAL OIL	10	1948	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1885	3067621083	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	7/22/1983	
TRANSFORMER	1887	3067621383	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	7/22/1983	
TRANSFORMER	1889	3067621783	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	7/25/1983	
TRANSFORMER	1893	811153142	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	IN SERVICE	6/11/2014	
TRANSFORMER	1894	811153146	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	SCRAPPED	1/26/2023	IN SERVICE 12/22/2000
TRANSFORMER	1895	811153147	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP. CAME BACK IN NON-WORKING CONDITION. ELECTRICALLY BAD WITH PAINT CRACKS ON THE TOP WHERE IT MEET ONE OF THE BUSHING
TRANSFORMER	1896	77A142379	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	6/3/1981	
TRANSFORMER	1898	811153154	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	IN SERVICE	12/2/1982	
TRANSFORMER	1902	M265525YGNA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1977	IN SERVICE	12/6/1977	
TRANSFORMER	1911	M338240YJNA	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	2/24/1978	
TRANSFORMER	1912	831117855	50	RTE	120/240	1	POLE	<1	MINERAL OIL	25	1983	IN SERVICE	7/1/1985	
TRANSFORMER	1919	128720	37.5	FPE	120/240	1	POLE	<1	MINERAL OIL	20	1966	IN SERVICE	6/16/1966	
TRANSFORMER	1928	K511865K73A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1973	IN SERVICE	8/31/1976	
TRANSFORMER	1931	S-55D092	25	WH	120/240	1	POLE	2	MINERAL OIL	15	1955	IN SERVICE		DISPATCH HAVE NO RECORD
TRANSFORMER	1933	77VC505001	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	4/15/1977	ADD IN SINGLE LINE.
TRANSFORMER	1935	M332552YJNA	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1977	IN SERVICE	10/11/1978	ADD IN SINGLE LINE
TRANSFORMER	1936	73AL22048	37.5	WH	120/240	1	POLE	<1		20	1974	IN SERVICE	9/21/1976	
TRANSFORMER	1937	77VC505006	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1977	SCRAPPED OR SOLD	2/5/2016	ADD IN SINGLE LINE
TRANSFORMER	1941	77A142386	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1978	IN SERVICE	11/22/1982	ADD IN SINGLE LINE
TRANSFORMER	1942	84AA033211	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1984	IN SERVICE	1/16/1985	ADD IN SINGLE LINE

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ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	1945	68AB15845	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1968	IN SERVICE	4/8/1993	
TRANSFORMER	1951	77VD509005	50	ME	120/240	1	POLE	<1	MINERAL OIL	10	1977	IN SERVICE	8/19/1977	ADD IN SINGLE LINE
TRANSFORMER	1952	170156	167	STD	120/240	1	PAD	<1	MINERAL OIL	70	1962	IN SERVICE	12/29/1983	
TRANSFORMER	1958	M332440YJNA	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	2/22/1978	ADD IN SINGLE LINE
TRANSFORMER	1960	K466255K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE	7/23/1986	
TRANSFORMER	1964	68AB6168	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1968	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	1966	73AC16688	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1973	IN SERVICE	8/27/1973	
TRANSFORMER	1967	73AC16727	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1973	IN SERVICE	8/27/1973	
TRANSFORMER	1975	5442184	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1950	IN SERVICE	7/1/1982	
TRANSFORMER	1978	M573832YHNA	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1977	IN SERVICE	4/15/1990	
TRANSFORMER	1980	70AD14856	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1970	IN SERVICE	4/15/1990	
TRANSFORMER	1982	N180930YLSA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1980	IN SERVICE	7/1/1982	
TRANSFORMER	1983	811153150	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	IN SERVICE	12/22/2000	IN SERVICE 12/22/2000
TRANSFORMER	2002	N9178N25CC1	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1967	IN SERVICE	3/15/2001	
TRANSFORMER	2006	L456122T74A	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1974	IN SERVICE	2/20/1991	FEEDING BLDG. 2 (CHILD DEVELOPMENT CENTER)
SWITCH	2007	L-464091P	2WAY	GE		3	PAD	<1	MINERAL OIL	280	1979	REMOVED	5/15/2023	IN SERVICE 4/23/1986 REPLACED DUE TO RUSTING
TRANSFORMER	2022	67AB127	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1969	IN SERVICE	12/6/1969	
TRANSFORMER	2034	80D1957501	500	HDD	480/277	3	PAD	<1	MINERAL OIL	250	1980	IN SERVICE	7/30/1982	
TRANSFORMER	2038	M592829TCRA	150	GE	208/120	3	PAD	<1	MINERAL OIL	150	1979	IN SERVICE	6/21/1982	
TRANSFORMER	2040	81D2158701	300	HDD	480/277	3	PAD	<1	MINERAL OIL	225	1981	IN SERVICE	1/14/2012	
SWITCH	2044	881156150	3WAY	RTE		3	PAD	<1		270		IN SERVICE	4/21/2001	
TRANSFORMER	2045	H858342K69A	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1969	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	2046	N003728TLRA	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1979	REMOVED	5/19/2016	IN SERVICE 75 KVA XFMR DUE TO MAINTENANCE.
TRANSFORMER	2056	H858557K69A	15	GE	120/240	1	POLE	<1	MINERAL OIL	10	1969	IN SERVICE	11/17/2008	
TRANSFORMER	2058	68AA1883	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1969	IN SERVICE	12/6/1969	
TRANSFORMER	2059	3048000483	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1982	REMOVED	9/15/2020	
TRANSFORMER	2061	83A442500	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	12/6/1983	
TRANSFORMER	2064	811153148	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	IN SERVICE	8/3/1982	
TRANSFORMER	2070	3067620283	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	10/19/1983	
TRANSFORMER	2071	82VL022001	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	1/27/1986	
TRANSFORMER	2072	3067630583	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	10/1/1983	
TRANSFORMER	2073	82VL022004	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	10/1/1983	
TRANSFORMER	2075	82VL022009	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	1/17/1983	
TRANSFORMER	2076	68AA2819	75	WH	120/240	1	POLE	<1		30	1968	IN SERVICE	11/17/2008	
TRANSFORMER	2077	82VL022002	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	4/15/2013	
TRANSFORMER	2078	82VL022015	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	1/17/1983	
TRANSFORMER	2079	82VL022006	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	1/17/1983	
TRANSFORMER	2080	3048000182	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	9/28/1982	
TRANSFORMER	2081	82VL022012	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	1/17/1983	
TRANSFORMER	2083	3048000283	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	9/28/1982	
TRANSFORMER	2122	84JM331140	75	WH	208/120	3	PAD	<1	MINERAL OIL	100	1984	IN SERVICE	5/12/1985	
TRANSFORMER	2123	836007992	300	RTE	480/277	3	PAD	<1	MINERAL OIL	225	1984	IN SERVICE	5/28/1987	
TRANSFORMER	2141	64SB1641	37.5	WH	240/480	1	POLE	<1	MINERAL OIL	20	1967	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP
TRANSFORMER	2142	64SB1650	37.5	WH	240/480	1	POLE	<1	MINERAL OIL	20	1967	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP
TRANSFORMER	2144	N003730TLRA	75	GE	208/120	3	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	1/22/1991	FEEDING BLDGS 13, 14, 18, 19 & 20 MSB/MOTORPOOL/FBI/AMMO SHED/HEADQUARTERS
SWITCH	2178	881156150	3WAY	RTE		3	PAD	<1	MINERAL OIL	270		IN SERVICE	9/15/2014	

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TRANSFORMER	2187	89C36265	750	PAU	480/277	3	PAD	25	MINERAL OIL	237	1989	IN SERVICE	1/2/2021	
TRANSFORMER	2192	89C36261	225	PAU	208/120	3	PAD	<1	MINERAL OIL	114	1972	IN SERVICE	8/20/1990	
TRANSFORMER	2200	M600937TFRA	150	GE	208/120	3	PAD	<1	MINERAL OIL	150	1979	IN SERVICE	6/16/2010	
TRANSFORMER	2204	820252-1	1000	SQD	480/277	3	PAD	<1		342		IN SERVICE	8/6/1998	
TRANSFORMER	2205	M096216TKMA	50	GE	240/480	1	PAD	<1		25	1976	IN SERVICE	9/15/1986	
TRANSFORMER	2206	M096217YLMA	50	GE	240/480	1	PAD	<1		25	1976	IN SERVICE	9/15/1986	
TRANSFORMER	2207	M096215YLMA	50	GE	240/480	1	PAD	<1		25	1976	IN SERVICE	9/15/1986	
TRANSFORMER	2213	L461223T74A	225	GE	208/120	3	PAD	<1	MINERAL OIL	175	1974	IN SERVICE	2/23/1978	
TRANSFORMER	2214	H858805K69A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1969	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2216	L457308T74A	500	GE	480/277	3	PAD	<1	MINERAL OIL	250	1974	IN SERVICE	4/21/1976	
TRANSFORMER	2217	77K578307	100	WH	120/240	1	PAD	<1	MINERAL OIL	75	1977	REMOVED	10/17/2017	
TRANSFORMER	2218	74H798058	300	WH	208/120	3	PAD	<1	MINERAL OIL	225	1974	IN SERVICE	8/25/1977	FIELD VERIFIED BY JIM M.
TRANSFORMER	2221	82D2198201	300	HDD	480/277	3	PAD	<1	MINERAL OIL	225	1982	IN SERVICE	5/7/1996	
TRANSFORMER	2230	71AM3844	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1972	IN SERVICE	2/17/1988	
TRANSFORMER	2231	71AM3837	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1972	IN SERVICE	2/17/1988	
TRANSFORMER	2232	71AM3848	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1972	IN SERVICE	2/17/1988	
TRANSFORMER	2235	3067622583	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	11/10/1986	
TRANSFORMER	2236	3067622883	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	11/12/1986	
TRANSFORMER	2245	3067621583	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	7/25/1983	
TRANSFORMER	2246	82A430864	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1982	IN SERVICE	1/12/1984	
TRANSFORMER	2247	58SF819	75	WH	120/240	1	POLE	<1	MINERAL OIL	30	1958	SCRAPPED OR SOLD	12/17/2013	FROM ST. CHARLESH/LINCOLN. LEAKING SELF PROTECTING AND RECOMMEND SCRAPING.
TRANSFORMER	2257	82A430862	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1982	IN SERVICE	10/5/2012	
TRANSFORMER	2260	831117857	50	RTE	120/240	1	POLE	<1	MINERAL OIL	25	1984	IN SERVICE	12/11/1987	
TRANSFORMER	2261	82VL022010	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	12/11/1987	
TRANSFORMER	2263	64SF936	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1964	IN SERVICE	1/18/1988	
TRANSFORMER	2264	3067620783	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	10/26/1987	
TRANSFORMER	2272	82VL022013	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	7/26/2011	REPLACE AMP#1865 LOC#724 3257 CENTRAL AVE
TRANSFORMER	2273	82VL022011	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	11/2/2012	
TRANSFORMER	2274	811153153	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	IN SERVICE	4/2/1986	
TRANSFORMER	2275	811153151	25	RTE	120/240	1	PAD	<1	MINERAL OIL	15	1982	IN SERVICE	11/8/2000	
TRANSFORMER	2279	N180929YLSA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1980	IN SERVICE	4/2/1986	
TRANSFORMER	2284	M352547YJNA	50	GE	120/240	1	POLE	<1	MINERAL OIL	25		IN SERVICE		NEED FIELD VERIFY. MISSING BOE # & SERIAL NUMBER
TRANSFORMER	2285	3067630983	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	2/26/1986	
TRANSFORMER	2286	M265524YGNA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1977	IN SERVICE	2/27/1986	
TRANSFORMER	2287	59SG1421	100	WH	120/240	1	POLE	<1	MINERAL OIL	40	1959	IN SERVICE	7/23/1986	
TRANSFORMER	2293	503182378	50	HOW	120/240	1	POLE	<1	MINERAL OIL	25	1979	IN SERVICE	7/6/1982	
TRANSFORMER	2294	83VG035001	50	ME	240/480	1	POLE	<1	MINERAL OIL	10	1983	REMOVED	10/17/2017	
TRANSFORMER	2295	83VG035002	50	ME	240/480	1	POLE	<1	MINERAL OIL	10	1983	REMOVED	10/17/2017	
TRANSFORMER	2296	3067620883	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	2/3/1984	NEED FIELD VERIFY. MISSING SERIAL NUMBER
TRANSFORMER	2298	H867455K69A	10	GE	120/240	1	POLE	<1	MINERAL OIL	10	1969	IN SERVICE	1/15/2013	EMAIL RECEIVED FROM JIM MCANALLY FOR NEW CODES FOR THE 10 & 15 KVA 120/240V XFMR
TRANSFORMER	2299	73AL5738	10	WESCO	120/240	1	POLE	1	MINERAL OIL	10	1973	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2306	J747792K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1970	IN SERVICE	7/11/1990	
TRANSFORMER	2316	3067621483	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	2/3/1984	
TRANSFORMER	2317	K486955K72A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1972	IN SERVICE	8/8/1991	
TRANSFORMER	2318	K486969K72A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1972	IN SERVICE	10/19/1972	
TRANSFORMER	2319	K475074K72A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1972	IN SERVICE	5/15/1972	

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PCBs in Electrical Utilities Management Program - 2024 AMP Load Reductions
Attachment 1: AMP's 2024 PCBs-Containing OFEE Inventory

ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	2320	K507412K72A	25	GE	120/240	1	POLE	<1	MINERAL OIL	25	1972	SCRAPPED OR SOLD	12/11/2020	
TRANSFORMER	2321	77VC505005	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1977	SCRAPPED OR SOLD	11/4/2020	
TRANSFORMER	2322	73AL22052	37.5	WH	120/240	1	POLE	1	MINERAL OIL	20	1973	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2323	73AC16632	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1974	SCRAPPED OR SOLD	3/27/2013	SELF PROTECTED STYLE. AMP IS NO MORE USING THIS STYLE OF XFMR
TRANSFORMER	2326	72AB1138	25	WH	120/240	1	POLE	16	MINERAL OIL	15	1972	SCRAPPED OR SOLD	2/5/2016	SELF PROTECTING. CAME DOWN FROM 3250 FERNSIDE WITH 16 PPM PCB.
TRANSFORMER	2327	72AB1983	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1972	IN SERVICE	5/1/1972	
TRANSFORMER	2328	K486959K72A	37.5	GE	120/240	1	POLE	17	MINERAL OIL	20	1972	SCRAPPED OR SOLD	2/5/2016	SELF PROTECTING. CAME DOWN FROM 870 WALNUT WITH 17 PPM PCB.
TRANSFORMER	2329	K475078K72A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1972	IN SERVICE	5/1/1972	
TRANSFORMER	2332	K514480K73A	37.5	GE	120/240	1	POLE	<1		20	1973	IN SERVICE	3/5/1973	
TRANSFORMER	2333	K511875K73A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1973	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	2334	3067630283	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	10/18/1983	
TRANSFORMER	2340	73AL21055	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1974	IN SERVICE	2/22/1977	ADD IN SINGLE LINE
TRANSFORMER	2341	811153145	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	IN SERVICE	8/3/1982	
TRANSFORMER	2342	3067622983	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	1/27/1986	
TRANSFORMER	2348	K502902K72A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1972	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2353	H858880K69A	75	GE	120/240	1	POLE	<1	MINERAL OIL	30	1969	IN SERVICE	6/25/1982	
TRANSFORMER	2354	76A353574	15	WH	120/240	1	POLE	<1	MINERAL OIL	10	1976	IN SERVICE	8/23/1977	ADD IN SINGLE LINE
TRANSFORMER	2355	69AL5615622	37.5	WH	120/240	1	POLE	12.98	MINERAL OIL	20	1970	REMOVED	12/22/2019	
TRANSFORMER	2356	N180927YLSA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1980	IN SERVICE	12/10/1982	
TRANSFORMER	2357	82VL022003	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	8/24/1993	
TRANSFORMER	2358	3067631083	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	10/1/1983	
TRANSFORMER	2360	82A430861	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1982	IN SERVICE	10/1/1983	
TRANSFORMER	2364	K511869K73A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1973	IN SERVICE	4/27/1973	
TRANSFORMER	2365	M265526YGNA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1977	IN SERVICE	8/23/1977	ADD IN SINGLE LINE
TRANSFORMER	2367	73AL2113	15	WH	120/240	1	POLE	<1	MINERAL OIL	10	1973	IN SERVICE	8/23/1977	ADD IN SINGLE LINE
TRANSFORMER	2370	3067630383	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	10/24/1983	ADD IN SINGLE LINE
TRANSFORMER	2371	83A523385	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1984	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	2373	K503904K72A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1972	SCRAPPED OR SOLD	2/11/1980	IN SERVICE 2/11/1980
TRANSFORMER	2381	K499103K72A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1973	SCRAPPED OR SOLD	10/17/2017	
TRANSFORMER	2383	73AE10916	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1973	IN SERVICE	2/22/1977	ADD IN SINGLE LINE
TRANSFORMER	2384	76A353576	15	WH	120/240	1	POLE	<1	MINERAL OIL	10	1976	IN SERVICE	8/23/1977	ADD IN SINGLE LINE
TRANSFORMER	2385	36169-1778	37.5	HOW	120/240	1	POLE	<1	MINERAL OIL	20	1979	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2386	68AB15847	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1968	IN SERVICE	3/4/1969	
TRANSFORMER	2388	73AK22614	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1973	SCRAPPED OR SOLD	2/5/2016	AMP IS NO MORE USING THIS STYLE OF XFMR. REMOVE XFMR ON LOC#4835 ON 1/29/2014.
TRANSFORMER	2391	M265528YGNA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1977	IN SERVICE	12/6/1977	
TRANSFORMER	2395	M265527YGNA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1977	IN SERVICE	10/17/1977	
TRANSFORMER	2405	1203667	25	RTE	240/480	1	POLE	<1	MINERAL OIL	15	1961	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2406	5Y59155	167	WAG	240/480	1	POLE	<1	MINERAL OIL	70	1968	SCRAPPED OR SOLD	3/27/2013	DRAINED READY FOR SCRAP. TAGGED FOR SCRAP IN 2009
TRANSFORMER	2410	8102081702	50	KUH	240/480	1	POLE	<1	MINERAL OIL	10	1981	IN SERVICE		
TRANSFORMER	2411	8102081701	50	KUH	240/480	1	POLE	<1	MINERAL OIL	10	1981	IN SERVICE		
TRANSFORMER	2412	1203665	25	RTE	240/480	1	POLE	<1	MINERAL OIL	15	1961	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP
TRANSFORMER	2413	1203666	25	RTE	240/480	1	POLE	<1	MINERAL OIL	15	1961	SCRAPPED OR SOLD	3/27/2013	DRAINED & READY FOR SCRAP
TRANSFORMER	2419	811007105	50	RTE	240/480	1	POLE	<1	MINERAL OIL	25	1981	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2427	3059080382	100	KUH	240/480	1	POLE	<1	MINERAL OIL	40	1982	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2428	3059060262	100	KUH	240/480	1	POLE	<1	MINERAL OIL	40	1982	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2429	3059080182	100	KUH	240/480	1	POLE	<1	MINERAL OIL	40	1982	SCRAPPED OR SOLD	2/29/2012	

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PCBs in Electrical Utilities Management Program - 2024 AMP Load Reductions
Attachment 1: AMP's 2024 PCBs-Containing OFEE Inventory

ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	2432	5Y59157	167	WAG	240/480	1	POLE	<1	MINERAL OIL	70	1968	SCRAPPED OR SOLD	3/27/2013	DRAINED READY FOR SCRAP
TRANSFORMER	2433	5Y60013	167	WAG	240/480	1	POLE	<1	MINERAL OIL	70	1968	SCRAPPED OR SOLD	3/27/2013	DRAINED READY FOR SCRAP. TAGGED FOR SCRAP IN 2009
TRANSFORMER	2443	M530049YFPA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1978	SCRAPPED OR SOLD	3/27/2013	DRAINED READY FOR SCRAP. SELF PROTECTING XFMR. SEVERE PAINT CRACKING AT THE BOTTOM OF BOTH BUSHING & STARTING RUST. THE STRAP THAT HOLDS THE LID TIGHT ALSO HAS PAINT CHIP
TRANSFORMER	2444	K475601K72A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1972	SCRAPPED OR SOLD	12/9/2020	
TRANSFORMER	2500	H858552K69A	15	GE	120/240	1	POLE	<1	MINERAL OIL	10	1969	SCRAPPED OR SOLD	6/24/2020	ACCOUNTING REPORTING
TRANSFORMER	2501	H858558K69A	15	GE	120/240	1	POLE	<1	MINERAL OIL	10	1969	IN SERVICE	6/20/1990	
TRANSFORMER	2504	J785895K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	SCRAPPED OR SOLD	6/6/2014	
TRANSFORMER	2505	GV592935	37.5	LM	120/240	1	POLE	3	MINERAL OIL	20	1968	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2508	175802K73A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1973	IN SERVICE	10/17/1990	
TRANSFORMER	2514	J761473K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1970	SCRAPPED OR SOLD	11/4/2020	
TRANSFORMER	2515	J762623K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1970	SCRAPPED OR SOLD	11/4/2020	
TRANSFORMER	2516	J754880K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1970	SCRAPPED OR SOLD	6/6/2014	
TRANSFORMER	2517	J773401K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	SCRAPPED OR SOLD	10/17/2017	
TRANSFORMER	2520	H863589K69A	75	GE	120/240	1	POLE	<1	MINERAL OIL	30	1969	IN SERVICE	11/2/1979	
TRANSFORMER	2522	64SB828	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1964	SCRAPPED OR SOLD	3/27/2013	DRAIN & READY FOR SCRAP. BAD SECONDARY WINDINGS
TRANSFORMER	2529	M530041YFPA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1978	IN SERVICE	3/17/1981	
TRANSFORMER	2532	73AK22626	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1973	IN SERVICE	4/18/1994	
TRANSFORMER	2533	229051178	37.5	HOW	120/240	1	POLE	<1	MINERAL OIL	20	1979	SCRAPPED	1/26/2023	IN SERVICE 4/6/1993
TRANSFORMER	2536	36167-1778	37.5	HOW	120/240	1	POLE	<1	MINERAL OIL	20	1979	IN SERVICE	8/20/1992	
TRANSFORMER	2537	H555530K68A	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1968	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	2539	M332434YJNA	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1977	SCRAPPED OR SOLD	6/6/2014	
TRANSFORMER	2540	H838964K68A	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1968	IN SERVICE	5/7/1971	
TRANSFORMER	2543	73AK10796	10	WH	120/240	1	POLE	<1	MINERAL OIL	10	1973	IN SERVICE	12/10/1991	
TRANSFORMER	2545	H877830K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1970	IN SERVICE	4/1/1970	
TRANSFORMER	2546	811153143	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	SCRAPPED OR SOLD	10/17/2017	
TRANSFORMER	2547	71A141698	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1978	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2548	77A302011	37.5	WH	120/240	1	POLE	1	MINERAL OIL	20	1978	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2549	H877831K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1970	IN SERVICE	4/1/1970	
TRANSFORMER	2552	69AD3878	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1969	IN SERVICE	11/25/1969	
TRANSFORMER	2553	J738350K70A	10	GE	120/240	1	PAD	<1	MINERAL OIL	10	1969	IN SERVICE	4/28/1970	
TRANSFORMER	2555	19854-978	37.5	HOW	120/240	1	POLE	<1	MINERAL OIL	20	1979	IN SERVICE	5/28/1992	
TRANSFORMER	2558	229041178	37.5	HOW	120/240	1	POLE	<1	MINERAL OIL	20	1979	IN SERVICE	2/28/1980	
TRANSFORMER	2559	361711778	37.5	HOW	120/240	1	POLE	<1	MINERAL OIL	20	1979	IN SERVICE	2/28/1980	
TRANSFORMER	2560	3091510578	37.5	HOW	120/240	1	POLE	<1	MINERAL OIL	20	1979	IN SERVICE	2/28/1980	
TRANSFORMER	2565	F691046-63	100	GE	120/240	1	PAD	<1	MINERAL OIL	40	1962	IN SERVICE	12/3/1963	
TRANSFORMER	2568	76E228009	100	WH	120/240	1	PAD	<1	MINERAL OIL	75	1976	IN SERVICE	8/24/1976	ENGG V/S DISPATCH DATABASE OK
TRANSFORMER	2576	K534989M71A	50	GE	120/240	1	PAD	<1	MINERAL OIL	60	1971	IN SERVICE	8/16/1972	
TRANSFORMER	2578	68AA2815	75	WH	120/240	1	POLE	<1	MINERAL OIL	30	1968	IN SERVICE	12/22/2000	
TRANSFORMER	2579	J820140M71A	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	10	1971	IN SERVICE	8/16/1972	
TRANSFORMER	2580	J738353K70A	10	GE	120/240	1	PAD	<1	MINERAL OIL	10	1969	IN SERVICE	4/28/1970	
TRANSFORMER	2585	391952579	50	HOW	120/240	1	POLE	<1	MINERAL OIL	25	1979	REMOVED	2/6/2023	Replaced with (#6455) 20A140908 9/7/2021
TRANSFORMER	2586	73AC16731	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1973	IN SERVICE	11/14/1973	FIELD VERIFY BY KARL ON 6/20/2008
TRANSFORMER	2587	3067630483	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	10/8/1992	
TRANSFORMER	2590	659263278	50	HOW	120/240	1	POLE	<1	MINERAL OIL	25	1979	REMOVED	2/6/2023	Replaced with (#6454) 20A160607 9/7/2021
TRANSFORMER	2591	77VC505008	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	8/8/1977	XFMR AMP # 2591 IS OK

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TRANSFORMER	2593	391932579	50	HOW	120/240	1	POLE	<1	MINERAL OIL	25	1979	REMOVED	2/6/2023	Replaced with (#6495) 21A041543 9/7/2021
TRANSFORMER	2594	62SF2006	10	WH	120/240	1	POLE	<1	MINERAL OIL	10	1962	REMOVED	12/5/2019	NEED FIELD VERIFY. MISSING SERIAL NUMBER
TRANSFORMER	2596	L676749K74A	25	GE	240/480	1	POLE	<1	MINERAL OIL	15	1974	IN SERVICE	7/28/1974	
TRANSFORMER	2597	66AC13541	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1968	REMOVED	7/13/2016	
TRANSFORMER	2599	K514487K73A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1973	IN SERVICE	11/14/1973	FIELD VERIFY BY KARL ON 6/20/2008
TRANSFORMER	2600	K502915K72A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1972	SCRAPPED OR SOLD	6/6/2014	10-CA OIL. PAINT CHIPS & RUST THROUGHOUT THE ENTIRE XFMR, ESPECIALLY ON THE LID & AROUND BUSHINGS. SELF PROTECTING & RECOMMENDED FOR SCRAP.
TRANSFORMER	2601	K486310K72A	10	WH	120/240	1	POLE	<1	MINERAL OIL	10	1972	SCRAPPED OR SOLD	6/6/2014	PAINT DISCOLORING FADED. RUSTED ALL ROUND (CSP) XFMR. RECOMMENDED TO BE SCRAPED.
TRANSFORMER	2602	M530047YFPA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1978	IN SERVICE	4/8/1993	
TRANSFORMER	2603	G422464-65	100	GE	120/240	1	POLE	<1	MINERAL OIL	40	1965	IN SERVICE	10/12/1965	
TRANSFORMER	2604	H533919-67K	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1967	IN SERVICE	2/1/1995	
TRANSFORMER	2607	L676748K74A	25	GE	240/480	1	POLE	<1	MINERAL OIL	15	1974	IN SERVICE	7/28/1974	
TRANSFORMER	2609	3067630185	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	10/8/1992	
TRANSFORMER	2612	59SJ1564	100	WH	120/240	1	POLE	<1	MINERAL OIL	40	1959	IN SERVICE	6/30/1965	
TRANSFORMER	2613	G421123	10	GE	120/240	1	POLE	<1	MINERAL OIL	10	1965	IN SERVICE	10/12/1965	
TRANSFORMER	2615	H877826K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1970	IN SERVICE	4/1/1970	
TRANSFORMER	2616	58SB1191	15	WH	120/240	1	POLE	<1	MINERAL OIL	10	1958	SCRAPPED OR SOLD	6/6/2014	AS PER JIM MCANALLY EMAIL ON 2/24/2012 11:59AM. DAMAGED INSULATOR AND AGE
TRANSFORMER	2619	811153152	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	IN SERVICE	6/14/1983	
TRANSFORMER	2621	73AK1849	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1973	SCRAPPED OR SOLD	10/17/2017	
TRANSFORMER	2622	3088070284	50	KUH	120/240	1	POLE	<1	MINERAL OIL	50	1984	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	2623	7032940	10	LM	120/240	1	POLE	<1	MINERAL OIL	10	1964	IN SERVICE	6/30/1965	
TRANSFORMER	2624	9812441	37.5	GE	120/240	1	POLE	1.54	MINERAL OIL	20	1954	REMOVED	4/24/1962	
TRANSFORMER	2626	3067622783	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	10/8/1999	
TRANSFORMER	2627	811153140	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	IN SERVICE	6/14/1983	
TRANSFORMER	2628	811153141	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1982	IN SERVICE	6/14/1983	
TRANSFORMER	2629	H858833K69A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1969	IN SERVICE	11/14/1973	FIELD VERIFY BY KARL ON 6/20/2008
TRANSFORMER	2637	3067620583	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	10/8/1999	
TRANSFORMER	2638	3067622283	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	10/8/1999	
TRANSFORMER	2641	84AA033210	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1984	IN SERVICE	9/4/1987	
TRANSFORMER	2642	J757422K70A	50	GE	120/240	1	POLE	<1	MINERAL OIL	10	1970	IN SERVICE	7/23/1996	
TRANSFORMER	2646	73AK6015	15	WH	120/240	1	POLE	<1	MINERAL OIL	10	1973	IN SERVICE	12/13/1974	
TRANSFORMER	2649	73AK14752	15	WH	120/240	1	POLE	<1	MINERAL OIL	10	1973	IN SERVICE	3/1/1984	
TRANSFORMER	2651	4646478	50	AC	120/240	1	PAD	<1	MINERAL OIL	25	1967	IN SERVICE		FIELD VERIFY BY JIM MCRORY ON 11/20/2006.
TRANSFORMER	2653	73AK14759	15	WH	120/240	1	POLE	<1	MINERAL OIL	10	1973	IN SERVICE	3/1/1984	
TRANSFORMER	2659	150682	50	HIL	120/240	1	POLE	<1	MINERAL OIL	60	1959	SCRAPPED OR SOLD	3/27/2013	DRAINED READY FOR SCRAP. TAGGED BAD. INTERNAL SHORT.
TRANSFORMER	2660	61SJ2717	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1962	IN SERVICE	9/1/1983	
TRANSFORMER	2661	J781770K71A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1971	IN SERVICE	7/9/1987	
TRANSFORMER	2667	H531109-67	25	GE	120/240	1	POLE	21	MINERAL OIL	15	1967	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2685	82VL022005	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1982	REMOVED	3/21/2023	REMOVED 2/23/2023
TRANSFORMER	2686	82A431274	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1982	IN SERVICE	5/13/1996	
TRANSFORMER	2688	3088070183	50	KUH	120/240	1	POLE	<1	MINERAL OIL	15	1984	IN SERVICE	3/2/1984	
TRANSFORMER	2693	3067621183	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	9/13/1983	
TRANSFORMER	2694	73AE10893	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1973	IN SERVICE	5/20/1975	
TRANSFORMER	2696	3067630683	37.5	KUH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	9/13/1933	
TRANSFORMER	2701	H839413K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	IN SERVICE	2/3/1970	

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PCBs in Electrical Utilities Management Program - 2024 AMP Load Reductions
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ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	2703	H839412K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	IN SERVICE	2/3/1970	
TRANSFORMER	2707	66AD7977	15	WH	120/240	1	POLE	4	MINERAL OIL	10	1966	IN SERVICE	12/11/1999	
TRANSFORMER	2710	60SJ1541	10	WH	120/240	1	POLE	68	MINERAL OIL	10	1961	SCRAPPED OR SOLD	12/11/2013	
TRANSFORMER	2711	58SB45	167	WH	120/240	1	POLE	<1	MINERAL OIL	70	1958	SCRAPPED OR SOLD	6/6/2014	
TRANSFORMER	2715	H839415K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	IN SERVICE	2/3/1970	
TRANSFORMER	2720	77A142391	37.5	WH	120/240	1	POLE	1	MINERAL OIL	20	1978	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2740	69AK6241	10	WH	120/240	1	POLE	<1	MINERAL OIL	10	1969	IN SERVICE	3/1/1984	
TRANSFORMER	2742	60SK1111	10	GE	120/240	1	POLE	2.03	MINERAL OIL	10	1960	REMOVED	1/21/2020	
TRANSFORMER	2745	M191131YDNA	100	GE	240/480	1	POLE	<1	MINERAL OIL	40	1977	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2746	83A523384	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1984	IN SERVICE	3/1/1984	
TRANSFORMER	2749	M191130YDNA	100	GE	240/480	1	POLE	<1	MINERAL OIL	40	1977	SCRAPPED OR SOLD	2/29/2012	
TRANSFORMER	2755	77A152359	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1978	IN SERVICE	9/27/1978	
TRANSFORMER	2757	F95303364K	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1965	IN SERVICE	4/1/1984	
TRANSFORMER	2763	77A141697	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1978	IN SERVICE	9/13/1978	
TRANSFORMER	2764	G421119	10	GE	120/240	1	POLE	<1	MINERAL OIL	10	1965	IN SERVICE	10/12/1965	
TRANSFORMER	2765	7032938	10	LM	120/240	1	POLE	<1	MINERAL OIL	10	1964	IN SERVICE	6/30/1965	
TRANSFORMER	2768	63SC1354	37.5	WH	120/240	1	POLE	6	MINERAL OIL	20	1963	IN SERVICE	4/3/1963	
TRANSFORMER	2769	4639332	167	GE	120/240	1	POLE	<1	MINERAL OIL	70		REMOVED	6/30/2021	DEL MONTE - OVHD TO UG
TRANSFORMER	2770	836002655	150	RTE	208/120	3	PAD	<1	MINERAL OIL	150	1983	IN SERVICE	4/10/1985	
TRANSFORMER	2772	59SC676	100	STD	120/240	1	PAD	<1	MINERAL OIL	40	1959	IN SERVICE	1/13/1965	
TRANSFORMER	2774	3067620983	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	9/19/1984	
TRANSFORMER	2776	459932178	50	HOW	120/240	1	POLE	<1	MINERAL OIL	25	1979	SCRAPPED OR SOLD	11/9/2021	DEL MONTE - OVHD TO UG
TRANSFORMER	2780	62SJ62	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1962	IN SERVICE	9/28/1962	
TRANSFORMER	2781	63SC1166	10	WH	120/240	1	PAD	<1	MINERAL OIL	10	1963	IN SERVICE	12/3/1963	
TRANSFORMER	2786	F69104963	100	GE	120/240	1	PAD	<1	MINERAL OIL	40	1963	IN SERVICE	11/6/1963	
TRANSFORMER	2787	58SF820	75	WH	120/240	1	POLE	<1	MINERAL OIL	30	1958	IN SERVICE	4/1/1985	
TRANSFORMER	2794	83A442497	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	3/7/1990	
TRANSFORMER	2806	73K605042	150	WH	208/120	3	PAD	<1	MINERAL OIL	150	1973	SCRAPPED OR SOLD	8/9/2022	ORIGINAL REMOVED 8/14/2019
TRANSFORMER	2807	L722286TFNA	150	GE	208/120	3	PAD	<1	MINERAL OIL	150	1977	IN SERVICE	7/17/1978	
TRANSFORMER	2903	K467739K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE	6/8/1990	
TRANSFORMER	2911	58SF1075	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1958	IN SERVICE	7/13/1987	
TRANSFORMER	2913	4879320	15	WH	120/240	1	POLE	<1	MINERAL OIL	10	1948	IN SERVICE	8/18/1987	
TRANSFORMER	3007	61SH1552	10	GE	120/240	1	PAD	5.85	MINERAL OIL	10	1961	REMOVED	9/24/2019	FIELD VERIFY BY JIM MCRORY ON 11/6/2006
TRANSFORMER	3012	L119310Y73A	50	GE	120/240	1	PAD	<1		25	1973	REMOVED	9/24/2019	FIELD VERIFY BY JIM MCRORY ON 11/6/2006
TRANSFORMER	3025	59SJ1563	100	STD	120/240	1	POLE	<1		40	1959	IN SERVICE	6/30/1965	
TRANSFORMER	3035	L679740K74A	100	GE	240/480	1	POLE	<1	MINERAL OIL	40	1974	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	3037	L679741K74A	100	GE	240/480	1	POLE	<1	MINERAL OIL	40	1974	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	3040	H840264K68A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1968	IN SERVICE	1/22/2001	
TRANSFORMER	3042	H840265K68A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1968	IN SERVICE	10/23/2000	
TRANSFORMER	3046	L679742K74A	100	GE	240/480	1	POLE	<1	MINERAL OIL	40	1974	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	3050	H868274K70A	10	GE	120/240	1	POLE	<1	MINERAL OIL	10	1970	SCRAPPED OR SOLD	6/6/2014	EMAIL RECEIVED FROM JIM MCANALLY FOR NEW CODES FOR THE 10 & 15 KVA 120/240V XFMR
TRANSFORMER	3051	72AA8729	250	WH	120/240	1	POLE	<1	MINERAL OIL	75	1972	SCRAPPED OR SOLD	6/6/2014	ESNA PRIMARY BUSHINGS RECOMMENDED FOR SCRAP
TRANSFORMER	3053	3103238	167	KUH	120/240	1	PAD	<1	MINERAL OIL	70	1967	IN SERVICE	12/14/1967	
TRANSFORMER	3056	58SA337	167	WH	120/240	1	PAD	<1	MINERAL OIL	70	1958	IN SERVICE	1/13/1965	
TRANSFORMER	3057	E236727-59	100	GE	120/240	1	POLE	2	MINERAL OIL	40	1959	IN SERVICE	12/11/1961	ADD IN SINGLE LINE
TRANSFORMER	3061	L229692K73A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1974	IN SERVICE	11/17/2014	
TRANSFORMER	3067	67AD8124	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1967	IN SERVICE	12/11/1999	

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ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	3068	AV114305	75	LM	120/240	1	POLE	<1	MINERAL OIL	30	1962	IN SERVICE	10/25/1989	
TRANSFORMER	3075	82VL022014	37.5	ME	120/240	1	POLE	<1	MINERAL OIL	20	1982	IN SERVICE	4/4/1983	
TRANSFORMER	3076	L229687K73A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1974	SCRAPPED OR SOLD	6/6/2014	
TRANSFORMER	3077	N180928YLSA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1980	IN SERVICE	10/25/1989	
TRANSFORMER	3078	G422465-65	100	GE	120/240	1	POLE	<1	MINERAL OIL	40	1965	IN SERVICE	10/12/1965	
TRANSFORMER	3080	62SJ61	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1962	IN SERVICE	11/13/1989	
TRANSFORMER	3081	3273236	50	WH	120/240	1	POLE	<1	MINERAL OIL	15	1944	SCRAPPED OR SOLD	10/17/2017	ADD IN SINGLE LINE
TRANSFORMER	3082	58SF1073	50	WH	120/240	1	PAD	<1	MINERAL OIL	25	1958	IN SERVICE	3/8/1966	FIELD VERIFY BY JIM MCRORY ON 11/20/2006.
TRANSFORMER	3084	J747808K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1970	IN SERVICE	4/1/1985	
TRANSFORMER	3091	63SD821	100	STD	120/240	1	POLE	<1	MINERAL OIL	40	1963	REMOVED	8/12/1977	ADD IN SINGLE LINE. 8/12/1977 in service. 9/26/2022 Returned from the field.
TRANSFORMER	3094	3067621683	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	3097	J784924K71A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1971	IN SERVICE	8/30/1971	
TRANSFORMER	3099	H863585K69A	75	GE	120/240	1	POLE	<1	MINERAL OIL	30	1969	IN SERVICE	8/11/1974	
TRANSFORMER	3100	PAJ1391	300	STD	208/120	3	PAD	<1	MINERAL OIL	210	1969	IN SERVICE	12/1/1970	
TRANSFORMER	3113	K856629T73A	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1973	IN SERVICE	8/11/1976	
TRANSFORMER	3116	L191970T73	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1973	IN SERVICE	10/7/1979	
TRANSFORMER	3117	58SF1068	50	WH	120/240	1	POLE	<1	MINERAL OIL	25	1958	IN SERVICE	4/15/1990	
TRANSFORMER	3118	62SF2008	10	WH	120/240	1	PAD	<1	MINERAL OIL	10	1962	IN SERVICE	11/6/1963	
TRANSFORMER	3119	L191969T73	37.5	GE	120/240	1	PAD	<1	MINERAL OIL	40	1973	IN SERVICE	8/11/1976	
TRANSFORMER	3123	J815823M70A	75	GE	208/120	3	PAD	<1	MINERAL OIL	100	1970	IN SERVICE	3/10/1971	
TRANSFORMER	3124	83JD932083	225	WH	208/120	3	PAD	<1	MINERAL OIL	175	1983	IN SERVICE	7/18/1984	
TRANSFORMER	3134	361781778	50	HOW	120/240	1	POLE	<1	MINERAL OIL	25	1979	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	3138	J762624K70A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1970	REMOVED	3/11/2021	
TRANSFORMER	3140	M530048YFPA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1978	SCRAPPED OR SOLD	2/5/2016	ADD IN SINGLE LINE
TRANSFORMER	3144	L229684K73A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1974	IN SERVICE	12/10/1985	
TRANSFORMER	3149	150679	50	HIL	120/240	1	POLE	<1	MINERAL OIL	60	1959	IN SERVICE	1/7/1964	
TRANSFORMER	3150	63SC1164	10	WH	120/240	1	POLE	<1	MINERAL OIL	10	1963	IN SERVICE	1/7/1964	
TRANSFORMER	3151	150681	50	HIL	120/240	1	POLE	<1	MINERAL OIL	60	1959	IN SERVICE	1/7/1964	
TRANSFORMER	3162	150678	50	HIL	120/240	1	POLE	<1	MINERAL OIL	60	1959	IN SERVICE	1/7/1964	
TRANSFORMER	3166	6943136	25	WH	120/240	1	POLE	<1	MINERAL OIL	15	1964	SCRAPPED OR SOLD	2/5/2016	
SWITCH	3169	841137183	2WAY	ABC		3	PAD	<1	MINERAL OIL	280	1984	IN SERVICE	3/20/1989	
SWITCH	3171	8066A	2WAY	TRA		3	PAD	<1	MINERAL OIL	280	1980	IN SERVICE	1/13/1989	
TRANSFORMER	3172	M265529YGNA	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1977	IN SERVICE	4/17/1979	
TRANSFORMER	3173	M338238YJNA	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1977	IN SERVICE	4/17/1979	
TRANSFORMER	3236	83VG035003	50	ME	240/480	1	POLE	<1	MINERAL OIL	10	1983	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	3374	67K17977	25	WH	120/240	1	POLE	120.13	MINERAL OIL	15	1967	REMOVED	2/20/2017	WE FOUND THIS XFMR IS NOT IN OUR DATABASE INCLUDES AS400
TRANSFORMER	3392	63SC1362	37.5	WH	120/240	1	POLE	<1	MINERAL OIL	20	1963	SCRAPPED OR SOLD	2/5/2016	
TRANSFORMER	3398	3067620383	25	KUM	120/240	1	POLE	<1	MINERAL OIL	15	1983	IN SERVICE	2/3/1984	
SWITCH	3567	4Q9011073	2WAY	CP		3	PAD	<1		280		IN SERVICE	3/11/1992	FIELD VERIFY BY JIM MCRORY ON 10/31/2006.
TRANSFORMER	3638	73J588702	500	WH	480/277	3	PAD	<1	MINERAL OIL	250	1973	SCRAP	9/27/2023	Installed 8/20/2020, removed 2/1/2023
TRANSFORMER	3646	3067630783	37.5	KUM	120/240	1	POLE	<1	MINERAL OIL	20	1983	IN SERVICE	2/11/2002	
TRANSFORMER	3828	3173313498	167	HOW	120/240	1	PAD	29	MINERAL OIL	138	1998	REMOVED	10/17/2017	
TRANSFORMER	3829	3173333498	167	HOW	120/240	1	PAD	7	MINERAL OIL	138	1998	SCRAPPED OR SOLD	12/11/2020	ACCOUNTING REPORTING
TRANSFORMER	4187	81JJ535174	25	WH	120/240	1	PAD	<1	MINERAL OIL	40	1984	IN SERVICE	8/16/2012	EMT TESTED ON 8/22/2011 - PASS
TRANSFORMER	4195	5455144	75	GE	120/240	1	PAD	<1	MINERAL OIL	40	1965	IN SERVICE	7/22/1965	
SWITCH	4210	4Q0027173	2WAY	CP		3	PAD	<1	MINERAL OIL	280		IN SERVICE		
TRANSFORMER	4430	80JK330124	75	WH	208/120	3	PAD	<1	MINERAL OIL	100	1980	SCRAPPED OR SOLD	2/5/2016	REMOVE 4 KV TRANSFORMER
SWITCH	4453	CP570901766	2WAY	CP		3	PAD	<1		126		IN SERVICE		

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SWITCH	4454	CP570901764	2WAY	CP		3	PAD	<1		126		IN SERVICE		
TRANSFORMER	4462	BF0526001	300	ME	208/120	3	PAD	<1	MINERAL OIL	225	1952	OK TO SCRAP	11/3/2017	ACCOUNTING REPORTING
TRANSFORMER	4485	CP0755153524	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1977	IN SERVICE	6/24/2020	
TRANSFORMER	4716	H843100K68A	50	GE	120/240	1	POLE		MINERAL OIL	25	1968	REMOVED	7/2/2019	
TRANSFORMER	4719	H841842K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	IN SERVICE	7/2/2019	
TRANSFORMER	4720	H840036K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	IN SERVICE	7/2/2019	
TRANSFORMER	4721	H843102K68A	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1968	REMOVED	7/2/2019	
TRANSFORMER	4722	H841234K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	REMOVED	7/2/2019	
TRANSFORMER	4723	H540295K67	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1967	REMOVED	7/2/2019	
TRANSFORMER	4724	H841236K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	REMOVED	7/2/2019	
TRANSFORMER	4725	H840030K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	REMOVED	7/2/2019	
TRANSFORMER	4726	L212264K73A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1974	REMOVED	7/2/2019	
TRANSFORMER	4731	H840035K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	REMOVED	7/2/2019	
TRANSFORMER	4732	H841235K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	REMOVED	7/2/2019	
TRANSFORMER	4736	H840033K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	REMOVED	7/2/2019	
TRANSFORMER	4736	H840032K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	REMOVED	7/2/2019	
TRANSFORMER	4737	H841753K68A	25	GE	120/240	1	POLE	<1	MINERAL OIL	15	1968	REMOVED	7/2/2019	
TRANSFORMER	4738	H843104K68A	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1968	REMOVED	7/2/2019	
TRANSFORMER	4739	H842421K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	REMOVED	7/2/2019	
TRANSFORMER	4740	H840031K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	REMOVED	7/2/2019	
TRANSFORMER	4742	H845799K68A	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1968	IN SERVICE		
TRANSFORMER	4744	H845800K68A	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1968	IN SERVICE		
TRANSFORMER	4746	H841845K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	IN SERVICE		
TRANSFORMER	4752	H841239K68A	37.5	GE	120/240	1	POLE	<1	MINERAL OIL	20	1968	IN SERVICE		
TRANSFORMER	4760	22294-7	10	JER	120/240	1	POLE	<1	MINERAL OIL	10		IN SERVICE		
TRANSFORMER	6020	79JB913252	50	WH	120/240	1	PAD	<1	MINERAL OIL	60	1979	IN SERVICE	7/3/1980	
TRANSFORMER	6169	M332553YJNA	50	GE	120/240	1	POLE	<1	MINERAL OIL	25	1977	IN SERVICE	10/11/1978	NO AMP # BEFORE, SER. MAP POLE#3697 DUPLICATE, SO THIS LOC POLE #3857 309 BRUSH ST. NEW AMP#6169
TRANSFORMER	6400	20JC148250001	167/25	ABB	240/120	3	PAD	<1	MINERAL OIL	188	1920	REMOVED	10/19/2020	
TRANSFORMER	9005	32386-5	1500	ZINSCO	480/277	3	PAD	<1	MINERAL OIL	270		IN SERVICE	10/29/2007	RESERVED FOR AC
SWITCH	9016					3	PAD	<1	MINERAL OIL	280		IN SERVICE		
SWITCH	9017					3	PAD	<1	MINERAL OIL	280		IN SERVICE		
SWITCH	9018		5WAY			3	PAD	<1	MINERAL OIL	300		IN SERVICE		
SWITCH	9019								MINERAL OIL	280		REMOVED	2/8/2021	
SWITCH	9020		3WAY			3	PAD	<1	MINERAL OIL	300		IN SERVICE		
SWITCH	9030	609-78-0076	3WAY	G&W		3	PAD	<1	MINERAL OIL	300		IN SERVICE		
SWITCH	9031	93030	3WAY	TRAYER		3	PAD	<1	MINERAL OIL	300		IN SERVICE		
SWITCH	9032	81113B	4WAY	TRAYER		3	PAD	<1	MINERAL OIL	300		IN SERVICE		
SWITCH	9034	81113F	4WAY	TRAYER		3	PAD	<1	MINERAL OIL	300		IN SERVICE		
SWITCH	9035		4WAY						MINERAL OIL	300		IN SERVICE		
SWITCH	9036		4WAY	TRAYER		3	PAD	<1	MINERAL OIL	300		IN SERVICE		
SWITCH	9037	SC-506-5000-1	3WAY	GS		3	PAD	<1	MINERAL OIL	300		REMOVED	10/17/2017	
TRANSFORMER	9040	M156381	3000	GE	480/277	3	PAD	<1		400		IN SERVICE		
TRANSFORMER	9042	225U502-4968B	225	VIR	208/120	3	PAD			140		IN SERVICE		
TRANSFORMER	9047	PLA-0141	750	BAL	480/277	3	PAD	<1	MINERAL OIL	294		IN SERVICE		
TRANSFORMER	9048	PJK-5008	750	STD	480/277	3	PAD	<1		294		IN SERVICE		
TRANSFORMER	9050	826000806	75	RTE	208/120	3	PAD	<1	MINERAL OIL	100		REMOVED	6/4/2024	Removed/replaced from REUSE project UEL 99960 by L-1173
TRANSFORMER	9051	821014938	167	RTE	120/240	1	PAD	<1	MINERAL OIL	70	1982	IN SERVICE		

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PCBs in Electrical Utilities Management Program - 2024 AMP Load Reductions
Attachment 1: AMP's 2024 PCBs-Containing OFEE Inventory

ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER	9054	821014395	100	RTE	120/240	1	PAD	<1		40	1982	IN SERVICE		
TRANSFORMER	9055	821014394	100	RTE	120/240	1	PAD	<1		40	1982	IN SERVICE		
TRANSFORMER	9056	821005702	50	RTE	120/240	1	PAD	<1		60	1982	IN SERVICE		
TRANSFORMER	9057	821006257	75	RTE	120/240	1	PAD	<1		40	1982	IN SERVICE		
TRANSFORMER	9058	826000807	75	RTE	208/120	3	PAD	<1		100	1982	IN SERVICE		
TRANSFORMER	9060	79G016164	225	WH	208/120	3	PAD	<1	MINERAL OIL	175	1979	IN SERVICE		ALAMEDA POINT SITE A - DEMOLITION WORK
TRANSFORMER	9061	821006255	37.5	RTE	120/240	1	PAD	<1	MINERAL OIL	40	1982	IN SERVICE		FIELD VERIFIED BY JIM M. NO BOE #
TRANSFORMER	9062	821005701	25	RTE	120/240	1	PAD	<1	MINERAL OIL	13		IN SERVICE		
TRANSFORMER	9063	821005700	25	RTE	120/240	1	PAD	<1	MINERAL OIL	13		IN SERVICE		
TRANSFORMER	9064	821006256	37.5	RTE	120/240	1	PAD	<1	MINERAL OIL	40	1982	IN SERVICE		
TRANSFORMER	9066	19081-001	300	FP	208/120	3	PAD	<1	MINERAL OIL	205		IN SERVICE		ALAMEDA POINT SITE A - DEMOLITION WORK
TRANSFORMER	9067	EF06294387	75	ATL	120/240	1	PAD	<1	MINERAL OIL	60		IN SERVICE		
TRANSFORMER	9100	58SF311	100	STD	120/240	1	PAD	<1	MINERAL OIL	40	1958	IN SERVICE	10/12/1989	
SWITCH	C04								MINERAL OIL	280		REMOVED	2/8/2021	
TRANSFORMER	C06		37.5		120/240	1	POLE	<1		250		REMOVED		
TRANSFORMER	D03		1000	DRY	480/277	3	PAD	<1		250		IN SERVICE		
TRANSFORMER	D04		37.5		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	D04		10		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	D04		10		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	D04		10		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	D04		50	RTE	120/240	1	POLE	<1	MINERAL OIL	250		IN SERVICE	12/10/2010	FIELD VERIFY BY JOE ON 12/10/2010
TRANSFORMER	D04		37.5		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	D04		50	RTE	120/240	1	POLE	<1	MINERAL OIL	33		IN SERVICE	12/10/2010	FIELD VERIFY BY JOE ON 12/10/2010
TRANSFORMER	D05		100		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	D05		100		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	D05		100		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	D05		37.5		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	D06		5		120/240		POLE			250		REMOVED		DUE TO ALAMEDA LANDING PROJECT - TARGET PARKING LOT
TRANSFORMER	F04		75		480/277	3	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER	F05		25		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	F05		25		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER	F05		25		120/240	1	POLE	<1		250		IN SERVICE		
TRANSFORMER		2961	1500	SIEMENS	480/277	3	PAD	<1	MINERAL OIL	250		IN SERVICE		1500/2000 DRY XFMR
TRANSFORMER			1500	SIEMENS	480/277	3	PAD	<1	MINERAL OIL	250		IN SERVICE		1500/2000 DRY XFMR
TRANSFORMER		87-51107	2000		480/277	3	PAD			33		IN SERVICE		
TRANSFORMER		886010481	1000	RTE	480/277	3	PAD	<1	MINERAL OIL	33		IN SERVICE		
TRANSFORMER		32386-3	1000	ZINSCO	480/277	3	PAD	<1		250		IN SERVICE		
TRANSFORMER		32386-2	1500	ZINSCO	480/277	3	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER		32386-1	1000	ZINSCO	480/277	3	PAD	<1	MINERAL OIL	450		IN SERVICE		
TRANSFORMER		32386-9	1500	ZINSCO	480/277	3	PAD	<1	MINERAL OIL	270		IN SERVICE		
TRANSFORMER		13633	1000	INTEL	480/277	3	PAD	<1		450		IN SERVICE		
TRANSFORMER		M122014	12000	GE	4160/240	3	PAD	<1		500		REMOVED		
TRANSFORMER		PGG-1388	10000	STD	4160/240	3	PAD	<1		500		REMOVED		
TRANSFORMER		870277-A	500		480/277	3	PAD		MINERAL OIL	250		IN SERVICE		
TRANSFORMER		870277-A	500	SD	480/277	3	PAD		MINERAL OIL	250		IN SERVICE		
TRANSFORMER		PAB03820001	1500	ABB	480/277	3	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER		PAB03822	1500	ABB	480/277	3	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER		12892	750	T&R	480/277	3	PAD	3	MINERAL OIL	250		IN SERVICE		ALAMEDA POINT SITE A - DEMOLITION WORK

Note:
Red text are assumptions made by Geosyntec Consultants, Inc. for the purposes of completing load reduction calculations.

PCBs in Electrical Utilities Management Program - 2024 AMP Load Reductions
Attachment 1: AMP's 2024 PCBs-Containing OFEE Inventory

ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
SWITCH		8552B	3WAY	TRAYER		3	PAD	<1	MINERAL OIL	270		SCRAPPED OR SOLD	3/27/2013	ALAMEDA POINT, L-1207 SCRAP DRAINED B-162
TRANSFORMER		P173815	45	GE	208/120	3	PAD	<1		250		IN SERVICE		
TRANSFORMER		900385-A1	75	STD	208/120	3	PAD	<1		250		IN SERVICE		
TRANSFORMER		76H297020	500	WH	208/120	3	PAD	<1	MINERAL OIL	250		IN SERVICE		
SWITCH		6886-1	2WAY	CP		3	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER		901110960	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901112357	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901110962	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901109297	75	CP	120/240	1	PAD	<1	MINERAL OIL	55		IN SERVICE		
TRANSFORMER		901110963	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901111514	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901112905	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901108201	100	CP	120/240	1	PAD	<1	MINERAL OIL	40		IN SERVICE		
TRANSFORMER		901110964	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		SER.MAP SHOWS 100KVA, SINGLE LINE & DATABASE SHOWS 167KVA. NEED FIELD VERIFICATION
TRANSFORMER		901111511	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901112358	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901110961	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901111512	167	CP	120/240	1	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER		901112904	167	CP	120/240	1	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER		901112908	167	CP	120/240	1	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER		901112906	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901111513	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901108202	167	CP	120/240	1	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER		901112359	167	CP	120/240	1	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER		901111510	167	CP	120/240	1	PAD	<1	MINERAL OIL	250		IN SERVICE		
TRANSFORMER		901108200	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901112355	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901112907	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		901112356	167	CP	120/240	1	PAD	<1	MINERAL OIL	70		IN SERVICE		
TRANSFORMER		86ZE669001	75	MCG	120/240	1	POLE	<1	MINERAL OIL	250		IN SERVICE	12/10/2010	FIELD VERIFY BY JOE ON 12/10/2010
TRANSFORMER		HH13728	37.5	MAG	120/240	1	POLE	<1	MINERAL OIL	250		IN SERVICE	12/10/2010	FIELD VERIFY BY JOE ON 12/10/2010
TRANSFORMER		2654777	5	ALLIS	120/240	1	POLE	<1	MINERAL OIL	10		SCRAPPED OR SOLD	10/17/2017	FIELD VERIFY BY JOE ON 12/10/2010
TRANSFORMER		8991079997	15		120/240	1	POLE	<1		10		SCRAPPED OR SOLD	12/1/2016	
TRANSFORMER		8991079996	15		120/240	1	POLE	<1		10		SCRAPPED OR SOLD	12/1/2016	
TRANSFORMER		21495-5	5	JERRY	120/240	1	POLE	<1	MINERAL OIL	10		SCRAPPED OR SOLD	3/27/2013	4 KV XFMR AT ALAMEDA POINT
TRANSFORMER		21495-6	50	JERRY	120/240	1	POLE	<1	MINERAL OIL	10		SCRAPPED OR SOLD	3/27/2013	4 KV XFMR AT ALAMEDA POINT
TRANSFORMER		22395-10	75	JERRY	120/240	1	POLE	<1	MINERAL OIL	30		SCRAPPED OR SOLD	3/27/2013	4 KV XFMR AT ALAMEDA POINT
TRANSFORMER		891092085	75	RTE	120/240	1	POLE	<1	MINERAL OIL	33		SCRAPPED OR SOLD	3/27/2013	ALAMEDA POINT, 4KV TRANSFORMER
TRANSFORMER		891092086	75	RTE	120/240	1	POLE	<1	MINERAL OIL	33		SCRAPPED OR SOLD	3/27/2013	ALAMEDA POINT, 4KV TRANSFORMER
TRANSFORMER		891092084	75	RTE	120/240	1	POLE		MINERAL OIL	33		SCRAPPED OR SOLD	3/27/2013	ALAMEDA POINT, 4KV TRANSFORMER
TRANSFORMER		271690	5	LM	120/240	1	POLE		MINERAL OIL	10		SCRAPPED OR SOLD	3/27/2013	ALAMEDA POINT, 4KV TRANSFORMER
TRANSFORMER		891083142	37.5	RTE	120/240	1	POLE		MINERAL OIL	20		SCRAPPED OR SOLD	3/27/2013	ALAMEDA POINT, 4KV TRANSFORMER
TRANSFORMER		F68895063K	15	GE	120/240	1	POLE		MINERAL OIL	10		SCRAPPED OR SOLD	3/27/2013	ALAMEDA POINT, 4KV TRANSFORMER
TRANSFORMER		8550798	2000	MGM	4160/240	3	PAD	<1	MINERAL OIL	200	1953	REMOVED		ALAMEDA POINT SITE A - DEMOLITION WORK
TRANSFORMER		811138176	50	RTE	120/240	1	POLE	<1	MINERAL OIL	28	1981	IN SERVICE	12/10/2010	FIELD VERIFY BY JOE ON 12/10/2010
TRANSFORMER		811148844	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1981	IN SERVICE	12/10/2010	FIELD VERIFY BY JOE ON 12/10/2010
TRANSFORMER		811137713	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1981	IN SERVICE	12/10/2010	FIELD VERIFY BY JOE ON 12/10/2010

Note:
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PCBs in Electrical Utilities Management Program - 2024 AMP Load Reductions
Attachment 1: AMP's 2024 PCBs-Containing OFEE Inventory

ITEM	CO ID.	MFG SERIAL NO	SIZE	MFG	SEC VOLT	PHASE	TYPE	PCBs PPM	TYPE OF OIL	OIL GALLONS	PURCHASE YEAR	STATUS	DATE	COMMENTS
TRANSFORMER		811137714	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1981	IN SERVICE	12/10/2010	FIELD VERIFY BY JOE ON 12/10/2010
TRANSFORMER		2882159	2000	ALLIS	480/277	3	PAD	<1	MINERAL OIL	453		SCRAPPED OR SOLD	6/6/2014	WE REPLACED T-8468 TO T-1216. WE DID NOT HAVE ANY INFO.
TRANSFORMER		3550793	2000	MGM	480/277	3	PAD	<1	MINERAL OIL	453		SCRAPPED OR SOLD	6/6/2014	WE REPLACED T-8468 TO T-1216. WE DID NOT HAVE ANY INFO.
TRANSFORMER			1000	GE	480/277	3	PAD	<1	MINERAL OIL	450		SCRAPPED OR SOLD	6/6/2014	
TRANSFORMER		7937782	1000	GE	480/277	3	PAD	<1	MINERAL OIL	450		SCRAPPED OR SOLD	6/6/2014	
TRANSFORMER		811137715	25	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1981	IN SERVICE	12/10/2010	FIELD VERIFY BY JOE ON 12/10/2010
TRANSFORMER		811138177	50	RTE	120/240	1	POLE	<1	MINERAL OIL	15	1981	IN SERVICE		
TRANSFORMER		8991079995	15		120/240	1	POLE	<1		10		SCRAPPED OR SOLD	12/1/2016	
TRANSFORMER		891092087	75	RTE	120/240	1	POLE	<1	MINERAL OIL	33		REMOVED	10/17/2017	ALAMEDA POINT, 4KV TRANSFORMER
TRANSFORMER		811138171	37.5	RTE	120/240	1	POLE	<1	MINERAL OIL	21	1981	IN SERVICE	12/10/2010	FIELD VERIFY BY JOE ON 12/10/2010

Note:
Red text are assumptions made by Geosyntec Consultants, Inc. for the purposes of completing load reduction calculations.

APPENDIX C

PCBs in Building Materials Management Program – Fiscal Year 2023/24 Data Summary

Memorandum

Date: August 23, 2024
To: Sandy Mathews, Alameda Countywide Clean Water Program
From: Lisa Austin, Senior Principal, Lisa Welsh, Senior Scientist, Grace Yao, Professional Engineer, and Kiki Jin, Staff Engineer
Subject: PCBs in Building Materials Management Program – Fiscal Year 2023/24 Data Summary
Geosyntec Project Number: CWR0948

1. BACKGROUND

Municipal Regional Stormwater Permit (MRP; Order No. R2-2022-0018) Provision C.12.g requires Permittees to manage polychlorinated biphenyls (PCBs) containing materials and wastes during building demolition so that PCBs do not enter municipal storm drain systems. Provision C.12.g. applies to applicable structures containing building materials with PCBs concentrations of 50 ppm or greater at the time such structures undergo demolition. PCBs from these structures can enter storm drains during and/or after demolition through vehicle track-out, airborne releases, soil erosion, or stormwater runoff. Applicable structures include commercial, public, institutional, and industrial buildings constructed or remodeled between 1950 and 1980 undergoing full-building demolition. Single-family residential and wood frame structures are exempt.

The MRP Permittees developed and implemented a process, beginning in July 2019, for managing materials with PCBs concentrations of 50 ppm or greater in applicable structures when they undergo demolition. This technical memorandum documents the following items for the Alameda County Permittees, as required by MRP Provision C.12.g.iii.(3):

- a. The number of applicable structures that applied for a demolition permit during the reporting year.
- b. A running list of the applicable structures that applied for a demolition permit since July 1, 2019, the number of samples each structure collected, and the concentration of the PCBs in each sample.
- c. For each applicable structure with PCBs concentrations of 50 mg/kg or greater, include the following: the project address, demolition date, and a brief description of the PCBs-containing materials.

- d. For each structure that was constructed or remodeled between 1950 and 1980 and requires emergency demolition to protect public health and/or safety, provide the following: address, date the building was constructed, and date of demolition.

2. NUMBER OF APPLICABLE STRUCTURES

Table 1 below lists the number of applicable structures that applied for a demolition permit within Alameda County during Fiscal Year (FY) 2023/24 (i.e., from July 1, 2023 – June 30, 2024) and the number of samples in those buildings that were equal to or greater than 50 ppm.

Table 1: Number of Applicable Structures that Applied for a Demolition Permit in FY 2023/24

Permittee	# Applicable Structures	# Applicable Structures With At Least One Sample $\geq$ 50 ppm PCBs	# Samples $\geq$ 50 ppm PCBs
Alameda	2 ^a	-	-
Albany	0	0	0
Berkeley	4	0	0
Dublin	0	0	0
Emeryville	1	0	0
Fremont	0	0	0
Hayward	0	0	0
Livermore	0	0	0
Newark	1	0	0
Oakland	3	1	5
Piedmont	0	0	0
Pleasanton	0	0	0
San Leandro	0	0	0
Union City	0	0	0
Alameda County	0	0	0
Alameda County Total	11	1	5

Notes:

^aAsbestos and/or lead-containing materials were detected in the applicable structures. The structures were abated under the associated waste program; no PCB samples were taken.

3. LIST OF APPLICABLE STRUCTURES

A running list of the applicable structures that applied for a demolition permit since July 1, 2019, the number of samples each structure collected, the concentration of PCBs in each sample with

the address, estimated demolition date, and a brief description of the PCBs-containing materials, is provided in Attachment 1. No emergency demolition projects occurred in FY 2023/24.

4. DESCRIPTION OF PCBs CONTROL METHOD

On behalf of the MRP Permittees, the Bay Area Stormwater Management Agencies Association (BASMAA) conducted a regional project that developed an implementation framework, guidance materials, and tools for local agencies to ensure PCBs-containing materials and wastes are appropriately managed during building demolition. The Regional Project also provided training materials and a workshop for municipal staff, and an outreach workshop for the industry on implementing the framework/protocols developed via the project. The *PCBs in Priority Materials: Model Screening Assessment Applicant Package* document¹ was updated to include additional requirements in MRP 3.0 Provision C.12.g in May 2023.

Permittees implement the following process for this control measure:

- The municipality informs applicable demolition permit applicants that their projects are subject to the program for managing materials with PCBs, necessitating, at a minimum, an initial screening for priority PCBs-containing materials.
- For every applicable demolition project, applicants implement the BASMAA protocol for identifying building materials with PCBs concentrations of 50 ppm or greater and then complete and submit a version of BASMAA’s model “PCBs Screening Assessment Form” (Screening Form) or equivalent to the municipality.
- The municipality reviews the Screening Form to make sure it is filled out correctly and is complete and works with the applicant to correct any deficiencies.
- The municipality then issues the demolition permit or equivalent, according to its procedures.
- The municipality sends each completed Screening Form for applicable structures and any supporting documents to its countywide program. The countywide program compiles the forms and works with the other MRP countywide programs to manage and evaluate the data and assist Permittees with associated MRP reporting requirements.

¹ BASMAA 2018. PCBs in Priority Building Materials: Model Screening Assessment Applicant Package. Managing PCBs-Containing Building Materials during Demolition: Guidance, Tools, Outreach and Training. August. Revised November 2109 and May 2023.

Attachment 1
Running List of Applicable Structures for
Alameda County Permittees

ACCWP PCBs in Building Materials Management Program
List of Applicable Structures and Sampling Results

Reporting Year	Permittee	Building ID	Project Address	Project Zip Code	Project APN	Project Demolition Date	Sample ID	Sample Description	Reported Concentration (mg/kg)	Concentration ≥ 50 mg/kg (Y/N)
FY23-24	Berkeley	1	2538 Durant Avenue Berkeley, CA	94710	055-1876-021-01	N/A	P-1	Window Caulk	ND	N
FY23-24	Berkeley	1	2538 Durant Avenue Berkeley, CA	94710	055-1876-021-01	N/A	P-2	Roof mastic	ND	N
FY23-24	Berkeley	1	2538 Durant Avenue Berkeley, CA	94710	055-1876-021-01	N/A	P-3	Door caulk	ND	N
FY23-24	Berkeley	2	3030 Telegraph Avenue Berkeley, CA	94705	052-1576-027-01	N/A	112922-PCB-1a	Window Caulking	ND	N
FY23-24	Berkeley	2	3030 Telegraph Avenue Berkeley, CA	94705	052-1576-027-01	N/A	112922-PCB-1b	Concrete/Building Base Caulking	ND	N
FY23-24	Berkeley	2	3030 Telegraph Avenue Berkeley, CA	94705	052-1576-027-01	N/A	112922-PCB-2a	Concrete/Building Base Caulking	ND	N
FY23-24	Berkeley	2	3030 Telegraph Avenue Berkeley, CA	94705	052-1576-027-01	N/A	112922-PCB-2b	Concrete/Building Base Caulking	ND	N
FY23-24	Berkeley	2	3030 Telegraph Avenue Berkeley, CA	94705	052-1576-027-01	N/A	112922-PCB-3a	Rubber Window Gasket	ND	N
FY23-24	Berkeley	2	3030 Telegraph Avenue Berkeley, CA	94705	052-1576-027-01	N/A	112922-PCB-3b	Rubber Window Gasket	ND	N
FY23-24	Berkeley	2	3030 Telegraph Avenue Berkeley, CA	94705	052-1576-027-01	N/A	112922-PCB-3c	Rubber Window Gasket	ND	N
FY23-24	Berkeley	3	2555 College Avenue Berkeley, CA	94704	055-1847-020-00	N/A	PCB-2555-1	White Window Putty	ND	N
FY23-24	Berkeley	4	2720 Hillegass Avenue Berkeley, CA	94705	054-1711-027-00	N/A	COB2335-PCB02A	First Floor Open Area - Mastic under 12x12" Pink Vinyl Floor Tile	ND	N
FY23-24	Berkeley	4	2720 Hillegass Avenue Berkeley, CA	94705	054-1711-027-00	N/A	COB2335-PCB02B	First Floor Open Area - Mastic under 12x12" Pink Vinyl Floor Tile	ND	N
FY23-24	Berkeley	4	2720 Hillegass Avenue Berkeley, CA	94705	054-1711-027-00	N/A	COB2335-PCB01A	Exterior - Entry Door Door Gasket	ND	N
FY23-24	Berkeley	4	2720 Hillegass Avenue Berkeley, CA	94705	054-1711-027-00	N/A	COB2335-PCB01B	Exterior - Entry Door Door Gasket	ND	N
FY23-24	Emeryville	Em-01	1601-1607 63rd Street	94608	49-1488-1-1	N/A	COB2335-PCB02A	Mastic under 12x12 pink vinyl floor tile	ND	N
FY23-24	Emeryville	Em-01	1601-1607 63rd Street	94608	49-1488-1-1	N/A	COB2335-PCB02B	Mastic under 12x12 pink vinyl floor tile	ND	N
FY23-24	Emeryville	Em-01	1601-1607 63rd Street	94608	49-1488-1-1	N/A	COB2335-PCB01A	Exterior Entry Door Gasket	ND	N
FY23-24	Emeryville	Em-01	1601-1607 63rd Street	94608	49-1488-1-1	N/A	COB2335-PCB01B	Exterior Entry Door Gasket	ND	N
FY23-24	Newark	Newark-1	37660 Timber Street	94560	N/A	N/A	PCB-6		ND	N
FY23-24	Newark	Newark-1	37660 Timber Street	94560	N/A	N/A	PCB-7		ND	N
FY23-24	Newark	Newark-1	37660 Timber Street	94560	N/A	N/A	PCB-1		ND	N
FY23-24	Newark	Newark-1	37660 Timber Street	94560	N/A	N/A	PCB-2		ND	N
FY23-24	Newark	Newark-1	37660 Timber Street	94560	N/A	N/A	PCB-3		ND	N
FY23-24	Newark	Newark-1	37660 Timber Street	94560	N/A	N/A	PCB-4		ND	N
FY23-24	Newark	Newark-1	37660 Timber Street	94560	N/A	N/A	PCB-5		ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	TSI-1-1	HVAC ductwork (2nd Floor)	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	TSI-1-2	HVAC ductwork (2nd Floor)	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	TSI-2-1	Fiberglass batting (1st Floor)	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	TSI-2-2	Fiberglass batting (1st Floor)	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	EDS-1	Exterior door sealant	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	EDS-2	Exterior door sealant	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	EWS-1	Exterior window sealant	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	EWS-2	Exterior window sealant	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	EWS-3	Exterior window sealant	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	RM-1	Roof Mastic 1	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	RM-2	Roof Mastic 2	ND	N
FY23-24	Oakland	OAK-03	1904 Adeline St	94607	005-0406-032-00	8/16/2023	RM-3	Roof Mastic 3	ND	N
FY23-24	Oakland	OAK-10	7825 San Leandro Street	94621	041-0417500302	8/14/2023	Oak10_1	Caulking	ND	N
FY23-24	Oakland	OAK-10	7825 San Leandro Street	94621	041-0417500302	8/14/2023	Oak10_2	Mastic	ND	N
FY23-24	Oakland	OAK-10	7825 San Leandro Street	94621	041-0417500302	8/14/2023	Oak10_3	Fiberglass	ND	N
FY23-24	Oakland	OAK-10	7825 San Leandro Street	94621	041-0417500302	8/14/2023	Oak10_4	Pattern shop window	21	N
FY23-24	Oakland	OAK-10	7825 San Leandro Street	94621	041-0417500302	8/14/2023	Oak10_5	Paint	ND	N
FY23-24	Oakland	OAK-11	8301 MacArthur Blvd	94605	43-4621-1	2/4/2024	Oak11_1	Caulk Sample 1	320	Y
FY23-24	Oakland	OAK-11	8301 MacArthur Blvd	94605	43-4621-1	2/4/2024	Oak11_2	Fiberglass Insulation Sample 1	78	Y
FY23-24	Oakland	OAK-11	8301 MacArthur Blvd	94605	43-4621-1	2/4/2024	Oak11_3	Thermal Insulation Sample 1	20	N
FY23-24	Oakland	OAK-11	8301 MacArthur Blvd	94605	43-4621-1	2/4/2024	Oak11_4	Adhesive Mastic Sample 1	87.4	Y
FY23-24	Oakland	OAK-11	8301 MacArthur Blvd	94605	43-4621-1	2/4/2024	Oak11_5	Window Gasket Sample 1	70	Y
FY23-24	Oakland	OAK-11	8301 MacArthur Blvd	94605	43-4621-1	2/4/2024	Oak11_6	Wall Paint Sample 1	228	Y
FY22-23	Berkeley	B2021-04997	2527 San Pablo Ave	94702	054-1781-015-01	4/1/2023	1	White Window Putty at 4"x3" Windows	ND	N
FY22-23	Berkeley	B2021-04997	2527 San Pablo Ave	94702	054-1781-015-01	4/1/2023	2	Storage Attic: Ceilings	ND	N
FY22-23	Berkeley	B2021-04997	2527 San Pablo Ave	94702	054-1781-015-01	4/1/2023	3	Office: Floors	ND	N
FY22-23	Berkeley	B2022-00683	747 Bancroft Way	94710	056-1957-007-01	6/1/2022	1	Roof Mastic	ND	N
FY22-23	Berkeley	B2022-00683	747 Bancroft Way	94710	056-1957-007-01	6/1/2022	2	Roof Mastic	ND	N
FY22-23	Berkeley	B2022-00683	747 Bancroft Way	94710	056-1957-007-01	6/1/2022	3	Roof Mastic	ND	N
FY22-23	Berkeley	B2022-00683	747 Bancroft Way	94710	056-1957-007-01	6/1/2022	4	Roof Mastic	ND	N
FY22-23	Berkeley	B2022-00683	747 Bancroft Way	94710	056-1957-007-01	6/1/2022	5	Roof Mastic	ND	N
FY22-23	Berkeley	B2022-00683	747 Bancroft Way	94710	056-1957-007-01	6/1/2022	6	VFT Mastic	550	Y
FY22-23	Berkeley	B2022-00683	747 Bancroft Way	94710	056-1957-007-01	6/1/2022	7	VFT Mastic	450	Y
FY22-23	Berkeley	B2022-00683	747 Bancroft Way	94710	056-1957-007-01	6/1/2022	8	VFT Mastic	250	Y

ACCWP PCBs in Building Materials Management Program
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FY22-23	Berkeley	B2022-00697	2099 MLK Jr Way	94704	057-20240130	7/6/2022	1	Black Window Sealant	ND	N
FY22-23	Berkeley	B2022-00697	2099 MLK Jr Way	94704	057-20240130	7/6/2022	2	Door Frames	ND	N
FY22-23	Berkeley	B2022-00697	2099 MLK Jr Way	94704	057-20240130	7/6/2022	3	Black Expansion Joint Caulking @ Floors	ND	N
FY22-23	Berkeley	B2022-00697	2099 MLK Jr Way	94704	057-20240130	7/6/2022	4	Beige Caulking at Roof Parapet	ND	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	1	Ceiling tile	6.5	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	2	yellow carpet pad adhesive	ND	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	3	pink fiberglass above ceiling	0.82	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	4	yellow fiberglass inside flex duct	0.76	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	5	inside widow frame to structural concrete	ND	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	6	inside widow frame to structural concrete	ND	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	7	adhesive gluing sheetrock to concrete on inside of window return	ND	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	8	structural concrete wall to concrete sidewalk caulk	ND	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	9	compression gasket window metal to glass	ND	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	10	caulk from storefront window frame to stucco	ND	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	11	metal door frame to structural concrete caulk	ND	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	12	glaziers putty	ND	N
FY22-23	Berkeley	B2022-03254	2070 Allston Way, 2065 Kittredge St	94704	057-2027-006, 057-2027-007	2/1/2023	13	metal window frame to structural concrete original window	0.41	N
FY22-23	Emeryville	EM-01	5801 Christie Ave, Emeryville, CA	94608	49-1494-4-8	8/12/2022	EM-01-A	Caulking	7000	Y
FY22-23	Emeryville	EM-01	5801 Christie Ave, Emeryville, CA	94608	49-1494-4-8	8/12/2022	EM-01-B	Fiberglass Insulation	ND	N
FY22-23	Emeryville	EM-01	5801 Christie Ave, Emeryville, CA	94608	49-1494-4-8	8/12/2022	EM-01-C	Adhesive Mastic	ND	N
FY22-23	Emeryville	EM-01	5801 Christie Ave, Emeryville, CA	94608	49-1494-4-8	8/12/2022	EM-01-D	Window Gasket	3500	Y
FY22-23	Emeryville	EM-01	5801 Christie Ave, Emeryville, CA	94608	49-1494-4-8	8/12/2022	EM-01-E	Wall Paint	ND	N
FY22-23	Fremont	FRE-01	46350 Mission Street	94539	519 124407905, 519 124407802	TBD	M-1	Floor tile mastic	ND	N
FY22-23	Fremont	FRE-01	46350 Mission Street	94539	519 124407905, 519 124407802	TBD	M-2	Floor tile mastic	ND	N
FY22-23	Fremont	FRE-01	46350 Mission Street	94539	519 124407905, 519 124407802	TBD	M-3	Floor tile mastic	ND	N
FY22-23	Fremont	FRE-01	46350 Mission Street	94539	519 124407905, 519 124407802	TBD	TSI-1	Insulation	ND	N
FY22-23	Fremont	FRE-02	46494 Mission Street	94539	519 124408202	TBD	WS-1	Window sealant	ND	N
FY22-23	Fremont	FRE-02	46494 Mission Street	94539	519 124408202	TBD	WS-2	Window sealant	ND	N
FY22-23	Fremont	FRE-02	46494 Mission Street	94539	519 124408202	TBD	WS-3	Window sealant	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-1-11	Admin Bldg, under original black floor tile	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-1-12	Admin Bldg, interior paint	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-1-7	Admin Bldg, main floor northeast	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-1-8	Admin Bldg, main floor northeast	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-1-9	Admin Bldg, lower room, northwest corner	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-B-6	Admin Bldg, basement	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-E-1	Admin Bldg, glass block east wall	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-E-2	Admin Bldg, window east wall	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-E-3	Admin Bldg, east wall	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-E-4	Admin Bldg, east wall foundation base	ND	N
FY22-23	Oakland	OAK-01	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-R-5	Admin Bldg, roof	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	10-2-2	Plant building, packaging area, second floor windows	1.1	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	10-2-3	Plant building, packaging area, second floor steel column	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	10-2-4	Plant building, packaging area, second floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	10-R-1	Plant building, packaging area, roof	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	10-R-6	Plant building, roof, lower edge of exterior siding	5500	Y
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	10-R-7	Plant building, roof, exterior corrugated siding	36000	Y
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-1-10	Admin Bldg, under white floor tile north end	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-1	Plant building north end of exterior warehouse, main floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-10	Plant building north end of warehouse floor, first floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-11	Plant building north end of warehouse, first floor	10	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-12	Plant building, interior steel column	7.6	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-2	Plant building north end of warehouse, main floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-3	Plant building north end of exterior warehouse, back shop	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-1-13	Admin Bldg, fiberglass ceiling tile	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-4	Plant building north end of warehouse, main floor back shop	1.2	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	1-1-14	Admin Bldg, above white floor tile, northeast corner	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-5	Plant building north end of warehouse, back shop	ND	N

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FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-6	Plant building north end of warehouse, first floor tile	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-7	Plant building north end of warehouse, first floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	11-1-8	Plant building north end of warehouse, first floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-1-10	Plant building, offices on south side, first floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-1-4	Plant building, maintenance office north side, first floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-1-5	Plant building, offices on south side, first floor ceiling tile	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-1-6	Plant building, offices on south side, first floor tile	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-1-7	Plant building, offices on south side, first floor tile	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-1-8	Plant building, workshop on south side, first floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-1-9	Plant building, hallway floor on south side, first floor	1.2	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-11	Plant building, east side, second floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-12	Plant building, east side, second floor glass block windows	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-13	Plant building, west side, second floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-14	Plant building, west side upper walls, second floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-15	Plant building, center, second floor ceilings/trusses	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-17	Plant building, office on east side	1.4	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-17	Plant building, second floor steel truss	140	Y
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-18	B12 horizontal support at NW part of building	5.5	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-19	B12 roof support at NE part of building	0.82	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-20	B12 vertical "L" support at SW part of building	4.2	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-21	B12 column I beam north center of building	11	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-22	B12 column I beam east wall	15	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-2-23	B12 steel support at south end of building	25	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-R-1	Plant building, exterior on east side, upper bay windows	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-R-16	Plant building, south side, skylight corrugated siding	25000	Y
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	12-R-3	Plant building, office on east side, roof	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	13-1-5	Plant building warehousing, first floor wall under mezzanine	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	13-2-1	Plant building warehousing, second floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	13-2-2	Plant building warehousing, second floor	2.9	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	13-R-3	Plant building warehousing, roof	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	13-R-4	Plant building warehousing, roof skylight	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	6-1-1	Steel truss	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	6-1-2	Interior concrete pad	3	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	6-E-3	exterior perimeter concrete foundation	270	Y
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-1-1	Batch House, interior east side locker room	1.2	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-1-10	Plant building, steel structural I-beam	3100	Y
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-1-11	Plant building, steel stair rail	100	Y
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-1-6	Plant building, furnace area office, first floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-1-9	Plant Building, steel buckstay column	39	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-2-1	Plant building, furnace area, second floor steel column	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-2-2	Plant building, west electric area, second floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-2-3	Plant building, west electric area, second floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-2-4	Plant building, west electric area, second floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-2-5	Plant building, south wall furnace area, second floor	1.4	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-B-12	Plant building, basement buckstay support	1.8	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-B-13	Plant building, basement structural steel column	5.3	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-B-7	Plant building, furnace area, basement steel columns	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-E-14	Plant building, exterior concrete perimeter foundation	3.9	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-E-15	Plant building, exterior south column	3.3	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	8-E-8	Plant Building, west steel column	0.41	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	9-1-7	Plant Building Lehr area, first floor steel beams	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	9-1-8	Plant Building Lehr area, first floor	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	9-2-1	Plant Building Lehr area, second floor on brick wall	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	9-2-11	Plant Building Lehr area, second floor tile	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	9-2-2	Plant Building Lehr area, second floor on brick wall	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	9-2-3	Plant Building Lehr area, second floor exterior window	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	9-2-9	Plant Building Lehr area, second floor bathrooms	0.9	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	9-R-4	Plant Building Lehr area, roof	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	9-R-5	Plant Building Lehr area, exterior corrugated siding	ND	N
FY22-23	Oakland	OAK-06	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	9-R-6	Plant Building Lehr area, exterior large upper windows	ND	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-1-17	Batch house, paint on west wall	ND	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-1-2	Batch House, interior east side control room	ND	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-1-12	Batch House, east side interior	7000	Y
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-1-5	Batch House, interior on northeast side	5400	Y
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-1-6	Batch House, interior on northeast side	11000	Y
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-2-3	Batch House, south wall on east side	53	Y
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-2-4	Batch House, steel I-beams on east side	27000	Y
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-4-9	Batch House, interior central area	ND	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-2-8	Batch House, interior eastern part	31000	Y
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-3-18	Batch house, interior truss in center of building	93000	Y
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-14	Batch house window, first floor west	ND	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-15	Batch House, on concrete, southwest corner	ND	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-16	Batch house, canopy on south side steel	ND	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-B-10	Batch House, basement stairs	8300	Y
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-11	Batch House exterior on concrete foundation	240	Y

ACCWP PCBs in Building Materials Management Program
List of Applicable Structures and Sampling Results

Reporting Year	Permittee	Building ID	Project Address	Project Zip Code	Project APN	Project Demolition Date	Sample ID	Sample Description	Reported Concentration (mg/kg)	Concentration ≥ 50 mg/kg (Y/N)
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-21	Batch House, canopy north steel column	2.5	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-22	Batch House, new conveyor steel truss	0.9	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-23	Batch House, canopy steel truss	5.2	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-24	Batch House, north west corrugated siding	2.3	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-25	Batch House, bucket elevator	0.45	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-26	Batch House, bucket elevator support	ND	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-27	Batch house, south east concrete foundation	4.6	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-28	Batch house, south east corrugated siding	2.8	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-29	Batch House, northwest concrete foundation	5.5	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-30	Batch House, northwest glass storage concrete wall	2.5	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-7	Batch House, corrugated side on east side	ND	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-EXT-13	Concrete containment bin, east of batch house	ND	N
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-19	Batch House, Steel catwalk	38000	Y
FY22-23	Oakland	OAK-07	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	7-E-20	Batch House, canopy I-beam	51	Y
FY22-23	Oakland	OAK-20	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	20-R-1	Warehouse, roof	ND	N
FY22-23	Oakland	OAK-41	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	41-1-1	Warehouse 41, northeast side of plant, office main floor	ND	N
FY22-23	Oakland	OAK-41	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	41-1-2	Warehouse 41, northeast side of plant, office main floor	ND	N
FY22-23	Oakland	OAK-41	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	41-M-3	Warehouse 41, northeast side of plant, office mezzanine	1.6	N
FY22-23	Oakland	OAK-41	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	41-R-4	Warehouse 41, northeast side of plant, roof flashing	ND	N
FY22-23	Oakland	OAK-41	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	41-R-5	Warehouse 41, northeast side of plant, corrugated roof	ND	N
FY22-23	Oakland	OAK-42	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	42-2-1	Warehouse 42 north side of plant steel beams, second floor	1.6	N
FY22-23	Oakland	OAK-42	3600 Alameda Avenue	94601	33-2250-11-4	1/1/2023	42-2-2	Warehouse 42 north side of plant, second floor	ND	N
FY22-23	Pleasanton	SW Building	3300 Busch Rd	94566	946-1251-7-4	Jan. 2023	Caulking at NE Window	Caulking at NE Window	ND	N
FY22-23	Pleasanton	SW Building	3300 Busch Rd	94566	946-1251-7-4	Jan. 2023	Fiberglass Insulation Sample 1	Fiberglass Insulation Sample 1	ND	N
FY22-23	Pleasanton	SW Building	3300 Busch Rd	94566	946-1251-7-4	Jan. 2023	Fiberglass Insulation Sample 2	Fiberglass Insulation Sample 2	ND	N
FY22-23	Pleasanton	SW Building	3300 Busch Rd	94566	946-1251-7-4	Jan. 2023	Fiberglass Insulation Sample 3	Fiberglass Insulation Sample 3	ND	N
FY22-23	Pleasanton	SW Building	3300 Busch Rd	94566	946-1251-7-4	Jan. 2023	Black Roof Mastic Sample1	Black Roof Mastic Sample 1	ND	N
FY22-23	Pleasanton	SW Building	3300 Busch Rd	94566	946-1251-7-4	Jan. 2023	Black Roof Mastic Sample2	Black Roof Mastic Sample 2	ND	N
FY22-23	Pleasanton	SW Building	3300 Busch Rd	94566	946-1251-7-4	Jan. 2023	Black Roof Mastic Sample3	Black Roof Mastic Sample 3	ND	N
FY22-23	Pleasanton	SW Building	3300 Busch Rd	94566	946-1251-7-4	Jan. 2023	Black Roof Mastic Sample4	Black Roof Mastic Sample 4	ND	N
FY22-23	Pleasanton	SW Building	3300 Busch Rd	94566	946-1251-7-4	Jan. 2023	Gray/Black Roof Vent Mastic Sample 1	Gray/Black Roof Vent Mastic Sample 1	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-6A,B,C	East wing of building	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-7A,B,C	East wing of building	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-8A	Above Ceiling throughout Building	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-9A	Above Ceiling throughout Building	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-10A	Building Exterior	10	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-11A,B,C,D,E,F,G	Exterior Warehouse	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-12A	Exterior of framed panels - north wing	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-13A,B,C	Exterior of framed panels - north wing	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-14A	Exterior of building	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-15A,B,C,D,E	East and North wings of Building	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-16A	Warehouse Walls	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-17A	Warehouse Walls	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-18A	Warehouse Walls	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-19A,B,C,D,E,F,G	Throughout roof of building	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-20A	Roof - North Wing	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-21A,B,C	Throughout roof of building	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-22A,B,C	Throughout roof of building	ND	N
FY22-23	San Leandro	1919 Williams	1919 Williams Street	94577	77A-700-009-06	TBD	PCB-23A,B,C	Throughout roof of building	ND	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-1	Door caulking	0.473	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-2	Window caulking	2.18	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-3	Window caulking	1.37	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-4	Window caulking	2.22	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-5	Window caulking	0.468	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-6	Window gasket	0.461	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-7	Window gasket	0.471	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-8	Window gasket	0.471	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-9	Window gasket	0.462	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-10	Window gasket	3.12	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-11	paint on concrete	0.481	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-12	paint on concrete	0.473	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-13	paint on concrete	0.47	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-14	paint on concrete	0.479	N
FY22-23	San Leandro	2194 Edison	2194 Edison Ave.	94577	0	2/1/2023	PCB-15	paint on concrete	0.479	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 1	Gray window putty - interior window frames	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 2	Gray window putty - interior window frames	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 3	Gray window putty - interior window frames	ND	N

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FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 4	Gray window putty - interior window frames	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 5	Gray window putty - interior window frames	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 6	Gray window putty - interior window frames	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 7	Gray window putty - interior window frames	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 8	Gray window putty - interior window frames	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 9	Gray window putty - interior window frames	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 10	Yellow fiberglass pipe insulation	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 11	Yellow fiberglass pipe insulation	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 12	Yellow fiberglass pipe insulation	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 13	Black and gray roof patching/mastic - roofs	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 14	Black and gray roof patching/mastic - roofs	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 15	Black and gray roof patching/mastic - roofs	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 16	Black and yellow floor tile adhesive - floors	ND	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 17	Black and yellow floor tile adhesive - floors	2.9	N
FY22-23	Unincorporated County	AC-01	20478 Mission Blvd	94541	414 004605802	6/16/2022	PCB 18	Black and yellow floor tile adhesive - floors	2.8	N
FY22-23	Unincorporated County	AC-02	10570 Skyline Blvd	94546	085 000100201	5/5/2022	10570-RR-1EXT-C.7/1.3-P3	Tan window glaze/ris putty	ND	N
FY22-23	Unincorporated County	AC-03	10570 Skyline Blvd	94546	085 000100201	5/5/2022	10570-POOL-P1	Gray caulk between concrete patio control joints	ND	N
FY22-23	Unincorporated County	AC-03	10570 Skyline Blvd	94546	085 000100201	5/5/2022	10570-POOL-P2	Gray caulk between pool clay tile coping and concrete patio	ND	N
FY22-23	Unincorporated County	AC-04	21195 CENTER ST	94546	084C065000103	2/27/2023	PCB1	White window putty, south window	ND	N
FY22-23	Unincorporated County	AC-04	21195 CENTER ST	94546	084C065000103	2/27/2023	PCB2	Black mastic, west lower wall	ND	N
FY22-23	Unincorporated County	AC-04	21195 CENTER ST	94546	084C065000103	2/27/2023	PCB5	White caulking, roof exhaust	ND	N
FY22-23	Unincorporated County	AC-05	21195 CENTER ST	94546	084C065000103	2/27/2023	PCB3	Rubber window caulking, south window	ND	N
FY22-23	Unincorporated County	AC-05	21195 CENTER ST	94546	084C065000103	2/27/2023	PCB4	White window putty, south window	ND	N
FY22-23	Unincorporated County	AC-06	21195 CENTER ST	94546	084C065000103	2/27/2023	PCB6	White window putty, south window	ND	N
FY22-23	Unincorporated County	AC-06	21195 CENTER ST	94546	084C065000103	2/27/2023	PCB7	Yellow fiberglass insulation, south A/C	ND	N
FY22-23	Unincorporated County	AC-07	21195 CENTER ST	94546	084C065000103	2/27/2023	PCB8	Yellow fiberglass insulation, house plenum	ND	N
FY22-23	Unincorporated County	AC-08	16060 E 14TH ST	94578	080 005704100	3/9/2023	01-A	exterior front window	ND	N
FY22-23	Unincorporated County	AC-08	16060 E 14TH ST	94578	080 005704100	3/9/2023	01-B	exterior front window	ND	N
FY22-23	Unincorporated County	AC-08	16060 E 14TH ST	94578	080 005704100	3/9/2023	01-C	exterior front window	ND	N
FY22-23	Unincorporated County	AC-08	16060 E 14TH ST	94578	080 005704100	3/9/2023	02-A	YSA	ND	N
FY22-23	Unincorporated County	AC-08	16060 E 14TH ST	94578	080 005704100	3/9/2023	03-A	front door	ND	N
FY22-23	Unincorporated County	AC-08	16060 E 14TH ST	94578	080 005704100	3/9/2023	04-A	parapet roof	ND	N
FY22-23	Unincorporated County	AC-08	16060 E 14TH ST	94578	080 005704100	3/9/2023	04-B	parapet roof	ND	N
FY22-23	Unincorporated County	AC-08	16060 E 14TH ST	94578	080 005704100	3/9/2023	04-C	parapet roof	ND	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1971-3	Exterior Window Glazing	0.317	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1971-4	Exterior Window Glazing	0.324	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1971-11	Interior Window Glazing	0.322	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1971-12	Interior Window Glazing	0.328	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1971-1	Exterior Window Gasket	0.319	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1971-2	Exterior Window Gasket	0.325	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1971-3	Exterior Window Gasket	0.317	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1971-5	Exterior Brown Paint on Bldg.	0.333	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1957-6	Exterior Blue Paint on Bldg.	0.326	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1959-7	Exterior White Paint on Bldg.	0.318	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1951-8	Exterior Brown Paint on Bldg.	0.327	N
FY21-22	Berkeley	BER-1	1951-1975 Shattuck Ave.	94704	057-2046-001	2/15/2022	1951-29	Exterior Brown Paint on Bldg.	0.329	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-16	Exterior Window Caulking	3.33	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-17	Exterior Window Caulking	0.313	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-21	Exterior Window Caulking	3.17	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-23	Entry Door Caulking	3.21	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116B-24	Entry Door Caulking	3.28	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-13	Exterior Window Glazing	0.313	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-14	Exterior Window Glazing	0.317	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116B-25	Exterior Window Glazing	0.318	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2112-26	Side Window Glazing	0.322	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2112-27	Side Window Glazing	0.322	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2112-28	Back of Shop Window Glazing	0.32	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-18	Exterior Window Gasket	0.314	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-19	Exterior Window Gasket	0.332	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-22	Exterior Window Gasket	0.324	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2108-9	Exterior Red Paint on Wood	0.331	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2112-10	Exterior Purple Paint on Bldg.	0.331	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-15	Exterior Yellow Paint on CMU	0.331	N
FY21-22	Berkeley	BER-2	2109-2116 Berkeley Way	94704	057-2046-001	2/15/2022	2116A-20	Exterior Yellow Paint on CMU	0.331	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-01	Tan/Brown 3"x 6" Brick, 2 Inches from Exterior Sealant Seam	9	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-02	Brick Material Immediately Adjacent to Exterior Gray Seam Sealant (and 2 inches in)	3400	Y
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-03	Exterior Gray Seam Sealant (adjacent to outer boundary of exterior brick walkway)	170000	Y
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-04	Concrete Adjacent to Sealant Seam	2.6	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-05	Concrete Two Inches From Sealant Seam	1.2	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-06	Gray Window Frame Sealant on Concrete	1700	Y

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FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-07	Black Sealant (Window Frame to Window)	9.5	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-08	Black/Gray Window Frame Sealant (Window Frame to Concrete)	80000	Y
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-09	Black Window Sealant/ Window Frame to Window)	84	Y
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-10	Gray Paint on basement conference room wall	17	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-11	Cream Paint on basement conference room wall	4.3	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-12	Yellow Mastic associated with 12-inch vinyl floor tile (VFT)	ND	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-13	Cove Base Mastic	ND	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-14	Brown mastic associated 9-inch acoustic ceiling tile	ND	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-15	Cove base mastic	ND	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-16	Black Window Seal/Soft Window Sealant (Window Frame to Window)	61	Y
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-17	Black Soft Window Seal	19	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-18	Black Soft Window Seal	210	Y
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-19	Mastic associated with 2-foot VFT	ND	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-20	Black Rubber Window Seal	240	Y
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	PCB-21	Cove Base Mastic	ND	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-01	Wood Wall	ND	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-02	Wood Wall	ND	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-03	Concrete	5.4	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-04	Concrete	1.7	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-05	Concrete	61	Y
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-06	Concrete	1	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-07	Concrete	7.2	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-08	Concrete	1.3	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-09	Concrete	150	Y
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-10	Concrete	1.3	N
FY21-22	Berkeley	BER-3	2001 Ashby Ave.	94703	053-1591-018-03	2/4/2022	1112-11	Wood Wall	ND	N
FY21-22	Berkeley	BER-4	2345 Channing Way	94704	055-1884-001	4/14/2022	PCB-01	2nd Floor west stairs landing mastic	ND	N
FY21-22	Berkeley	BER-4	2345 Channing Way	94704	055-1884-001	4/14/2022	PCB-02	2nd Floor SW window caulking	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 8	Fiberglass Roof Deck Ins.	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 9	Fiberglass Roof Deck Ins.	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 10	Fiberglass Roof Deck Ins.	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 11	Fiberglass Roof Deck Ins.	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 12	Fiberglass Roof Deck Ins.	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 13	Fiberglass Ceiling Insulation	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 14	Fiberglass Ceiling Insulation	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 15	Fiberglass Ceiling Insulation	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 16	Carpet Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 17	Carpet Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 18	Carpet Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 19	Floor Tile Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 20	Floor Tile Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 21	Floor Tile Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 22	Baseboard Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 23	Baseboard Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 24	Baseboard Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 25	Foam Pipe Insulation	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 26	Foam Pipe Insulation	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 27	Roof Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 28	Roof Mastic	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 29	HVAC Duct Insulation	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 30	HVAC Duct Insulation	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 1	Int. Window Gasket	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 2	Ext. Window Gasket	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 3	Ext. Window Caulk	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 4	Ext. Window Caulk	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 5	Ext. Door Gasket	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 6	Ext. Window Gasket	ND	N
FY21-22	Fremont	FRE-4	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-4 7	Ext. Window Gasket	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 10	Wall Insulation	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 11	Wall Insulation	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 12	Wall Insulation	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 13	Ceiling Insulation	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 14	Ceiling Insulation	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 15	Ceiling Insulation	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 4	Floor Tile Mastic	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 5	Floor Tile Mastic	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 6	Floor Tile Mastic	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 7	Wall Panel Mastic	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 8	Wall Panel Mastic	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 9	Wall Panel Mastic	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 16	Carpet Mastic	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 17	Carpet Mastic	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 18	Carpet Mastic	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 19	Roof Mastic	ND	N

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FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 20	Roof Mastic	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 1	Window Gasket	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 2	Window Gasket	ND	N
FY21-22	Fremont	FRE-5	6700 Stevenson Blvd	94538	531 016503804	3/30/2022	FRE-5 3	Window Gasket	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-1	Black roof penetration	3.7	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-2	Black roof penetration	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-3	Black roof penetration	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-4	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-5	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-6	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-7	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-8	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-9	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-10	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-21	Black adhered to tile floor	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-22	Black adhered to tile floor	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-23	Black adhered to tile floor	13.3	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-24	Black adhered to tile floor	13.86	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-25	Black adhered to tile floor	52	Y
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-26	Yellow adhered to tile floor	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-27	Yellow adhered to tile floor	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-28	Yellow adhered to tile floor	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-29	Yellow adhered to tile floor	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-30	Yellow adhered to tile floor	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-31	Yellow adhered to tile floor	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-32	Brown adhered to tile floor	3.89	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-33	Brown adhered to tile floor	2.6	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-34	Brown adhered to tile floor	2.77	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-35	Black adhered to tile floor	8	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-36	Black adhered to tile floor	12.53	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-37	Black adhered to tile floor	10.38	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-38	Gray adhered to tile floor	11.4	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-39	Gray adhered to tile floor	2.31	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-40	Gray adhered to tile floor	5.87	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-41	Yellow/brown adhered to tile floor	7.2	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-42	Yellow/brown adhered to tile floor	3.08	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-43	Yellow/brown adhered to tile floor	25	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-44	Gray	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-45	Gray	0.7	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-46	Gray	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-47	Gray	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-48	Gray	330	Y
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-49	Dark gray	0.75	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-55	White	ND	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-56	Pipe	0.97	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-57	Duct	15	N
FY21-22	Hayward	Hay-01 Bldg 1	24493 Clawiter Rd	94545	0	11/15/2021	PCB-58	Pipe	4.4	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-11	Black roof penetration	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-12	Black roof penetration	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-13	Black roof penetration	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-14	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-15	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-16	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-17	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-18	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-19	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-20	Black roof	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-50	White	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-51	White	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-52	White	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-53	White	ND	N
FY21-22	Hayward	Hay-01 Bldg 2	24493 Clawiter Rd	94545	0	11/15/2021	PCB-54	White	ND	N
FY21-22	Hayward	Hay-1	411 Industrial Parkway and Mission 29827/29857 Mission Blvd.	94544	0	8/11/2020	caulk-1	window gasket	1300	Y
FY21-22	Hayward	Hay-2	603 A Street	94541	431-0004-090-00	8/31/2021	PCB-C1	PCB-C1	76	Y
FY21-22	Hayward	Hay-2	603 A Street	94541	431-0004-090-00	8/31/2021	PCB-C2	PCB-C2	88	Y
FY21-22	Hayward	Hay-2	603 A Street	94541	431-0004-090-00	8/31/2021	PCB-C3	PCB-C3	140	Y
FY21-22	Oakland	B2104293	4675 Tidewater Ave	94601	034 230001304	9/15/2021	B2104293-1	Gray caulk	ND	N
FY21-22	Oakland	B2104526	1701 Maritime St	94607	0000032000102	10/1/2021	B2104526-1	Gray caulking on Door frame B317-01PCB	3.2	N
FY21-22	Oakland	B2104526	1701 Maritime St	94607	0000032000102	10/1/2021	B2104526-2	Gray caulking on Door frame B317-02PCB	8.8	N
FY21-22	Oakland	B2104526	1701 Maritime St	94607	0000032000102	10/1/2021	B2104526-3	Grey window putty on roof skylights B317-18PCB	6.3	N
FY21-22	Oakland	B2104526	1701 Maritime St	94607	0000032000102	10/1/2021	B2104526-4	Brown mastic on 1"x1" ACT interlocking B317-14PCB	0.52	N
FY21-22	Oakland	B2104526	1701 Maritime St	94607	0000032000102	10/1/2021	B2104526-5	Brown mastic on 1"x1" ACT interlocking B317-15PCB	0.43	N
FY21-22	Oakland	B2104526	1701 Maritime St	94607	0000032000102	10/1/2021	B2104526-6	Brown mastic on 1"x1" ACT interlocking B317-16PCB	2.2	N

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FY21-22	Oakland	B2104526	1701 Maritime St	94607	0000032000102	10/1/2021	B2104526-7	Teal vinyl floor tile 12"x12" black mastic B317-04PCB	0.64	N
FY21-22	Oakland	B2104526	1701 Maritime St	94607	0000032000102	10/1/2021	B2104526-8	Teal vinyl floor tile 12"x12" black mastic B317-05PCB	0.63	N
FY21-22	Oakland	B2104526	1701 Maritime St	94607	0000032000102	10/1/2021	B2104526-9	Brown mastic on brown 4" covebase interior walls B317-10PCB	0.64	N
FY21-22	Oakland	B2105059	2400 Engineer Rd	94612	018 030500316	3/1/2022	B2105059-1	Beige caulking 1	56	Y
FY21-22	Oakland	B2105059	2400 Engineer Rd	94612	018 030500316	3/1/2022	B2105059-2	Gray caulking on CMU	21.7	N
FY21-22	Oakland	B2105316	347 E 18th St	94606	021 022300301	3/2/2022	B2105316-1	various	ND	N
FY21-22	Oakland	RB2103586	2434 Chestnut St - Office	94607	005 043501801 and 005 043500004	3/15/2022	RB2103586-1	Gray Caulking sample PCB29	0.94	N
FY21-22	Oakland	RB2103586	2434 Chestnut St - Office	94607	005 043501801 and 005 043500004	3/15/2022	RB2103586-2	Gray Caulking sample PCB30	0.62	N
FY21-22	Oakland	RB2103586	2434 Chestnut St - Office	94607	005 043501801 and 005 043500004	3/15/2022	RB2103586-3	Black Wall mastic sample PCB07	4.8	N
FY21-22	Oakland	RB2103586	2434 Chestnut St - Office	94607	005 043501801 and 005 043500004	3/15/2022	RB2103586-4	Tan wall mastic sample PCB08	2.1	N
FY21-22	Oakland	RB2103586	2434 Chestnut St - Office	94607	005 043501801 and 005 043500004	3/15/2022	RB2103586-5	Tan wall mastic sample PCB09	3.8	N
FY21-22	Oakland	RB2103586	2434 Chestnut St - Office	94607	005 043501801 and 005 043500004	3/15/2022	RB2103586-6	Brown ceiling tile mastic sample PCB13	3.5	N
FY21-22	Oakland	RB2103586	2434 Chestnut St - Office	94607	005 043501801 and 005 043500004	3/15/2022	RB2103586-7	Brown ceiling tile mastic sample PCB15	0.82	N
FY21-22	Oakland	RB2103586	2434 Chestnut St - Office	94607	005 043501801 and 005 043500004	3/15/2022	RB2103586-8	Black floor tile mastic sample PCB16	28	N
FY21-22	Oakland	RB2103586	2434 Chestnut St - Office	94607	005 043501801 and 005 043500004	3/15/2022	RB2103586-9	Black floor tile mastic sample PCB17	49	N
FY21-22	Oakland	RB2103586	2434 Chestnut St - Office	94607	005 043501801 and 005 043500004	3/15/2022	RB2103586-10	Black floor tile mastic sample PCB18	14	N
FY21-22	Oakland	RB2200719	1970 Seminary	94621	38-3211-1-4	7/1/2022	RB2200719-1	No suspect material present at site	ND	N
FY21-22	San Leandro	AC-1	1188 E. 14th Street	94577	077-0447-014-06	8/6/2022	PCB1	Window Sealant(gladd frame interface) East windows	50	Y
FY21-22	San Leandro	AC-1	1188 E. 14th Street	94577	077-0447-014-06	8/6/2022	PCB2	Window Sealant(gladd frame interface) Southwest windows	57	Y
FY21-22	San Leandro	AC-1	1188 E. 14th Street	94577	077-0447-014-06	8/6/2022	PCB3	2-foot by 4-foot fiberglass ceiling Center	ND	N
FY21-22	San Leandro	AC-1	1188 E. 14th Street	94577	077-0447-014-06	8/6/2022	PCB4	Yellow VFT mastic Center	23	N
FY21-22	San Leandro	AC-1	1188 E. 14th Street	94577	077-0447-014-06	8/6/2022	PCB5	Pink fiberglass insulation Center ceiling	ND	N
FY21-22	San Leandro	AC-1	1188 E. 14th Street	94577	077-0447-014-06	8/6/2022	PCB6	Black puck mastic South Wall	3.4	N
FY21-22	San Leandro	AC-1	1188 E. 14th Street	94577	077-0447-014-06	8/6/2022	PCB7	Wainscot mastic Restroom	ND	N
FY21-22	San Leandro	AC-1	1188 E. 14th Street	94577	077-0447-014-06	8/6/2022	PCB8	Yellow/orange paint North wall	14	N
FY21-22	San Leandro	AC-1	1188 E. 14th Street	94577	077-0447-014-06	8/6/2022	PCB9	Blue/purple paint Southeast wall	75	Y
FY21-22	San Leandro	AC-1	1188 E. 14th Street	94577	077-0447-014-06	8/6/2022	PCB10-EXT	Beige Paint on CMU Northwest wall	1.9	N
FY21-22	San Leandro	AC-2	1120 & 1124 Callan Street	94577	077-0447-015-06	8/6/2022	PCB100	Yellow baseboard mastic Suite A	1.8	N
FY21-22	San Leandro	AC-2	1120 & 1124 Callan Street	94577	077-0447-015-06	8/6/2022	PCB101	Yellow fiberglass insulation Lecture hall	0.6	N
FY21-22	San Leandro	AC-2	1120 & 1124 Callan Street	94577	077-0447-015-06	8/6/2022	PCB102	Black floor mastic Lecture hall	ND	N
FY21-22	San Leandro	AC-2	1120 & 1124 Callan Street	94577	077-0447-015-06	8/6/2022	PCB103	White paint 1st floor salon	ND	N
FY21-22	San Leandro	AC-2	1120 & 1124 Callan Street	94577	077-0447-015-06	8/6/2022	PCB104	Aluminum door sealant Northern doors	ND	N
FY21-22	San Leandro	AC-2	1120 & 1124 Callan Street	94577	077-0447-015-06	8/6/2022	PCB105	Skylight sealant Roof near HVAC system	ND	N
FY20-21	Alameda	COA-17	2015 Grand Street	94501	72-381-1	8/24/2020	COA-17-52	Gasket from access point to storage tank (sample 52)	ND	N
FY20-21	Alameda	COA-17	2015 Grand Street	94501	72-381-1	8/24/2020	COA-17-53	Gasket from access point to storage tank (sample 53)	ND	N
FY20-21	Alameda	COA-17	2015 Grand Street	94501	72-381-1	8/24/2020	COA-17-54	Gasket from access point to storage tank (sample 54)	ND	N
FY20-21	Alameda	COA-17	2015 Grand Street	94501	72-381-1	8/24/2020	COA-17-50	Orange paint on catwalk between storage tanks (sample 49)	ND	N
FY20-21	Alameda	COA-17	2015 Grand Street	94501	72-381-1	8/24/2020	COA-17-51	Orange paint on catwalk between storage tanks (sample 50)	ND	N
FY20-21	Alameda	COA-17	2015 Grand Street	94501	72-381-1	8/24/2020	COA-17-55	Orange paint on catwalk between storage tanks (sample 51)	ND	N
FY20-21	Alameda	COA-17	2015 Grand Street	94501	72-381-1	8/24/2020	COA-17-56	Grey paint on storage tanks (sample 55)	ND	N
FY20-21	Alameda	COA-17	2015 Grand Street	94501	72-381-1	8/24/2020	COA-17-57	Grey paint on storage tanks (sample 56)	ND	N
FY20-21	Alameda	COA-17	2015 Grand Street	94501	72-381-1	8/24/2020	COA-17-58	White paint on storage tanks (sample 57)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-27	Interior 12" pipe insulation in Compounding Room (sample 27)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-28	Interior 12" pipe insulation in Compounding Room (sample 28)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-29	Interior 12" pipe insulation in Compounding Room (sample 29)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-30	Interior 8" pipe insulation in Compounding Room (sample 30)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-30	Interior 8" pipe insulation in Compounding Room (sample 30)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-31	Interior 8" pipe insulation in Compounding Room (sample 31)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-32	Interior 4" pipe insulation in Compounding Room (sample 32)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-33	Interior 4" pipe insulation in Compounding Room (sample 33)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-34	Interior 4" pipe insulation in Compounding Room (sample 34)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-13	Floor tile mastic in Compounding Room (sample 13)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-14	Floor tile mastic in Compounding Room (sample 14)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-15	Ceiling tile mastic in Compounding Room (sample 15)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-16	Ceiling tile mastic in Compounding Room (sample 16)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-36	Roof mastic on Compounding Room (sample 36)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-37	Roof mastic on Compounding Room (sample 37)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-38	Roof mastic on Compounding Room (sample 38)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-39	Roof mastic on Compounding Room (sample 39)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-40	Roof mastic on Compounding Room (sample 40)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-17	Window gasket in Compounding Room (sample 17)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-18	Window gasket in Compounding Room (sample 18)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-43	Office door gasket in Compounding Room (sample 43)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-19	Blue paint on wall in Compounding Room (sample 19)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-20	Blue paint on wall in Compounding Room (sample 20)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-21	Blue paint on interior pipes in Compounding Room (sample 21)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-22	Blue paint on interior pipes in Compounding Room (sample 22)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-23	Blue paint on interior pipes in Compounding Room (sample 23)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-24	Silver paint on interior tank in Compounding Room (sample 24)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-25	Silver paint on interior tank in Compounding Room (sample 25)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-26	Silver paint on interior tank in Compounding Room (sample 26)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-41	Dark blue trim in Compounding Room (sample 41)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-42	Dark blue trim in Compounding Room (sample 42)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-44	Exterior white paint at Compounding Room (sample 44)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-45	Exterior grey paint at Compounding Room (sample 45)	ND	N

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FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-46	Grey paint on exterior pipes at Compounding Room (sample 46)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-47	Grey paint on exterior pipes at Compounding Room (sample 47)	ND	N
FY20-21	Alameda	COA-18	2015 Grand Street	94501	72-381-1	8/24/2020	COA-18-48	Grey paint on exterior pipes at Compounding Room (sample 48)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-10	Window putty at 2nd Floor in Main Warehouse (sample 10)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-11	Window putty at 2nd Floor in Main Warehouse (sample 11)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-12	Window putty at 2nd Floor in Main Warehouse (sample 12)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-13	Window putty at 1st Floor Offices in Main Warehouse (sample 13)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-14	Window putty at 1st Floor Offices in Main Warehouse (sample 14)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-15	Window putty at 1st Floor Offices in Main Warehouse (sample 15)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-43	Fiberglass insulation at Office Ceilings in Main Warehouse (sample 43)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-44	Fiberglass insulation at Office Ceilings in Main Warehouse (sample 44)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-45	Fiberglass insulation at Office Ceilings in Main Warehouse (sample 45)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-49	Fiberglass pipe insulation at UW in Main Warehouse (sample 49)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-50	Fiberglass pipe insulation at UW in Main Warehouse (sample 50)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-51	Fiberglass pipe insulation at UW in Main Warehouse (sample 51)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-16	Insulation HVAC ducts in Main Warehouse (sample 16)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-17	Insulation HVAC ducts in Main Warehouse (sample 17)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-18	Insulation HVAC ducts in Main Warehouse (sample 18)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-01	Ceiling tile mastic at Janitor in Main Warehouse (sample 01)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-02	Ceiling tile mastic at Janitor in Main Warehouse (sample 02)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-03	Ceiling tile mastic at Janitor in Main Warehouse (sample 03)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-04	Ceiling tile mastic at 1st Floor Offices in Main Warehouse (sample 04)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-05	Ceiling tile mastic at 1st Floor Offices in Main Warehouse (sample 05)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-06	Ceiling tile mastic at 1st Floor Offices in Main Warehouse (sample 06)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-07	Ceiling tile mastic at 2nd Floor Offices in Main Warehouse (sample 07)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-08	Ceiling tile mastic at 2nd Floor Offices in Main Warehouse (sample 08)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-09	Ceiling tile mastic at 2nd Floor Offices in Main Warehouse (sample 09)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-19	Baseboard mastic at 1st Floor Offices in Main Warehouse (sample 19)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-20	Baseboard mastic at 1st Floor Offices in Main Warehouse (sample 20)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-21	Baseboard mastic at 1st Floor Offices in Main Warehouse (sample 21)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-22	Baseboard mastic at 2nd Floor Offices in Main Warehouse (sample 22)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-23	Baseboard mastic at 2nd Floor Offices in Main Warehouse (sample 23)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-24	Baseboard mastic at 2nd Floor Offices in Main Warehouse (sample 24)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-25	Floor mastic black at 2nd Floor Offices in Main Warehouse (sample 25)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-26	Floor mastic black at 2nd Floor Offices in Main Warehouse (sample 26)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-27	Floor mastic black at 2nd Floor Offices in Main Warehouse (sample 27)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-28	Floor mastic black at 1st Floor Offices in Main Warehouse (sample 28)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-29	Floor mastic black at 1st Floor Offices in Main Warehouse (sample 29)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-30	Floor mastic black at 1st Floor Offices in Main Warehouse (sample 30)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-31	Floor mastic black at LW Buildout in Main Warehouse (sample 31)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-32	Floor mastic black at LW Buildout in Main Warehouse (sample 32)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-33	Floor mastic black at LW Buildout in Main Warehouse (sample 33)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-37	Roof mastic at UW Overhang in Main Warehouse (sample 37)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-38	Roof mastic at UW Overhang in Main Warehouse (sample 38)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-39	Roof mastic at UW Overhang in Main Warehouse (sample 39)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-46	Window gasket at 1st Floor Offices in Main Warehouse (sample 46)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-47	Window gasket at 1st Floor Offices in Main Warehouse (sample 47)	ND	N
FY20-21	Alameda	COA-19	2015 Grand Street	94501	72-381-1	1/1/2021	COA-19-48	Window gasket at 1st Floor Offices in Main Warehouse (sample 48)	ND	N
FY20-21	Alameda	COA-21	2015 Grand Street	94501	72-381-1	1/3/2021	COA-19-34	Floor Mastic at UW Buildout in Taylor Warehouse (sample 34)	ND	N
FY20-21	Alameda	COA-21	2015 Grand Street	94501	72-381-1	1/3/2021	COA-19-35	Floor Mastic at UW Buildout in Taylor Warehouse (sample 35)	ND	N
FY20-21	Alameda	COA-21	2015 Grand Street	94501	72-381-1	1/3/2021	COA-19-36	Floor Mastic at UW Buildout in Taylor Warehouse (sample 36)	ND	N
FY20-21	Alameda	COA-22	2015 Grand Street	94501	72-381-1	1/3/2021	COA-22-40	Roof mastic at Cooperage in Warehouse (sample 40)	ND	N
FY20-21	Alameda	COA-22	2015 Grand Street	94501	72-381-1	1/3/2021	COA-22-41	Roof mastic at Cooperage in Warehouse (sample 41)	ND	N
FY20-21	Alameda	COA-22	2015 Grand Street	94501	72-381-1	1/3/2021	COA-22-42	Roof mastic at Cooperage in Warehouse (sample 42)	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB05A	Concrete Floor Caulking 1	42	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 061820 PCB05A	Concrete Floor Caulking 3	44	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 061820 PCB05B	Concrete floor caulking 4	51	Y
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB05B	Concrete Floor Caulking 2	52	Y
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB01C	Carpet Adhesive + Tice Mastic	53	Y
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 061820 PCB05C	Concrete floor caulking 5	180	Y
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB01A	carpet adhesive Lobby	440	Y
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 061820 PCB01C	VFT Mastic West Exit Lobby	740	Y
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 061820 PCB01A	Carpet Adhesive + Tice Mastic	ND	N

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FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 061820 PCB07A	Concrete	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 061820 PCB07B	Concrete	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 061820 PCB07C	Concrete	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 061820 PCB07D	Concrete	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB01B	Carpet Adhesive + Tice Mastic	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB01D	Carpet Adhesive + Tice Mastic	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB02A	Pink Fiberglass insulation	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB02B	Yellow Fiberglass insulation	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB03A	Window Gasket	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB03B	Window Gasket	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB03C	Window Gasket	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB04A	Subfloor VFT Mastic	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB04B	VFT Black Mastic	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB04C	VFT Black Mastic	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB06A	Exterior Paint North	ND	N
FY20-21	Dublin	DUB-1	6700 Golden Gate Drive	94568	941-1500-0047-07	TBD	ABC2019 PCB06B	Exterior Paint West	ND	N
FY20-21	Fremont	FRE-1	3820 Peralta Blvd	94536	501 147504902	9/8/2020	E19-2028B-7-17-1B	door caulking	ND	N
FY20-21	Fremont	FRE-1	3820 Peralta Blvd	94536	501 147504902	9/8/2020	E19-2028B-7-17-2B	window gasket	ND	N
FY20-21	Fremont	FRE-1	3820 Peralta Blvd	94536	501 147504902	9/8/2020	E19-2028B-7-17-3B	window caulking	ND	N
FY20-21	Fremont	FRE-1	3820 Peralta Blvd	94536	501 147504902	9/8/2020	E19-2028B-7-17-4B	Ceiling Insulation	ND	N
FY20-21	Fremont	FRE-1	3820 Peralta Blvd	94536	501 147504902	9/8/2020	E19-2020B-7-17-5B	Thermals System Insulation	1800	Y
FY20-21	Fremont	FRE-2	37438 Fremont Blvd	94536	501 147503502	9/8/2020	E19-2028B-7-17-1B	Window caulking	ND	N
FY20-21	Fremont	FRE-2	37438 Fremont Blvd	94536	501 147503502	9/8/2020	E19-2028B-7-17-2B	bulk material	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-001A	bulk material	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-002A	bulk material	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-003A	bulk material	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-004A	insulation pipe (kettle)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-005A	insulation pipe (kettle)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-006A	insulation pipe (kettle)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-007A	insulation steam pipe	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-008A	insulation steam pipe	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-009A	insulation steam pipe	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-010A	insulation kiln box	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-011A	insulation kiln box	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-012A	insulation exhaust stack	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-013A	insulation exhaust stack	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-014A	insulation exhaust stack	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-015A	kettle insulation	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-016A	kettle insulation	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-017A	kettle insulation	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-018A	kiln flue insulation	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-019A	kiln flue insulation	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-020A	kiln flue insulation	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-021A	floor mastic (lunch room)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-022A	floor mastic (lunch room)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-023A	Floor mastic (2nd fl, office)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-024A	Floor mastic (2nd fl, office)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-025A	floor mastic (control room)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-026A	floor mastic (control room)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-027A	window caulk/glaze	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-028A	window caulk/glaze	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-029A	window caulk/glaze	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-030A	window caulk/glaze	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-031A	window caulk/glaze	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-032A	roof deck insulation	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-033A	roof deck insulation	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-034A	roof deck insulation	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-035A	baseboard mastic	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-036A	baseboard mastic	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-037A	baseboard mastic	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-038A	window caulk/glaze (OF)	670	Y
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-039A	window caulk/glaze (OF)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-040A	window caulk/glaze (OF)	76	Y
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-041A	insulation pipes (OF)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-042A	insulation pipes (OF)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-043A	insulation pipes (OF)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-044A	baseboard mastic (OF)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-045A	baseboard mastic (OF)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-046A	baseboard mastic (OF)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-047A	carpet mastic (OF)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-048A	carpet mastic (OF)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-049A	carpet mastic (OF)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-050A	Roof mastic (PH)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-051A	Roof mastic (PH)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008B80-052A	window caulk/glaze	ND	N

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FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008880-053A	window caulk/glaze	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008880-054A	roof mastic (Sec)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008880-055A	roof mastic (Sec)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008880-056A	floor mastic (Sec)	ND	N
FY20-21	Fremont	FRE-3	37887 Shinn St	94536	507 037700301	3/15/2021	2008880-057A	floor mastic (Sec)	ND	N
FY20-21	Fremont	FRE-4	37341 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-01	office; beneath carpet	ND	N
FY20-21	Fremont	FRE-4	37341 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-02	office; beneath tiles	13	N
FY20-21	Fremont	FRE-4	37341 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-03	office; baseboards	1	N
FY20-21	Fremont	FRE-4	37341 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-04	roof; penetrations	ND	N
FY20-21	Fremont	FRE-4	37341 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-05	roof; sky light	ND	N
FY20-21	Fremont	FRE-4	37341 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-06	Roof; all layers	ND	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-07	entry; floor	1.3	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-08	entry; door threshold	2.8	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-09	upstairs; beneath carpet	ND	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-10	downstairs; concrete wall	1.3	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-11	downstairs; wall (concrete) & ceiling	110	Y
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-12	downstairs; concrete expansion joint (SE Wall)	28000	Y
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-13	upstairs; baseboards	1.1	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-14	wall cavities	0.71	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-15	downstairs; HVAC unit	ND	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-16	HVAC ducts	0.41	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-17	exterior; front windows	1.8	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-18	roof; HVAC unit seams	ND	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-19	roof; sky light	1.2	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-20	roof; penetrations	0.98	N
FY20-21	Fremont	FRE-5	37343 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-21	roof; all layers	ND	N
FY20-21	Fremont	FRE-6	37347 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-22	bathroom; beneath tiles	12	N
FY20-21	Fremont	FRE-6	37347 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-23	bathroom; baseboards	0.5	N
FY20-21	Fremont	FRE-6	37347 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-24	bathroom; behind wall paneling	ND	N
FY20-21	Fremont	FRE-6	37347 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-25	upstairs; baseboards	ND	N
FY20-21	Fremont	FRE-6	37347 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-26	wall cavities	4.1	N
FY20-21	Fremont	FRE-6	37347 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-27	HVAC ducts	1.3	N
FY20-21	Fremont	FRE-6	37347 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-28	roof; sky light	ND	N
FY20-21	Fremont	FRE-6	37347 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-29	roof; penetrations	ND	N
FY20-21	Fremont	FRE-6	37347 Blacow Rd	94536	501-0350-015 and 501-0350-016	4/23/2021	48532-30	Roof; all layers	ND	N
FY20-21	Hayward	411 Industrial Pkwy	411 Industrial Pkwy	94544	0	8/11/2020		Gasket sampled	1300	Y
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-01	Expansion Caulk	ND	N
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-02	Window Caulk	ND	N
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-03	Door Caulk	ND	N
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-04	Carpet Adhesive	ND	N
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-05	Carpet Adhesive	ND	N
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-06	Carpet Adhesive	ND	N
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-07	Carpet Adhesive	ND	N
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-08	Carpet Adhesive	ND	N
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-09	Fiberglass Insulation Type 1	ND	N
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-10	Fiberglass Insulation Type 2	ND	N
FY20-21	San Leandro	SL-1	887 Manor Blvd.	94577	080H-1541-036	Spring 2021	PCB-11	Fiberglass Insulation Type 3	ND	N
FY20-21	San Leandro	SL-2	2366 Davis Street	94577	77A-649-8-62	1/31/2021	ALCO-01	Parapet Mastic	0.527	N
FY20-21	San Leandro	SL-2	2366 Davis Street	94577	77A-649-8-62	1/31/2021	ALCO-02	Parapet Mastic	0.597	N
FY20-21	San Leandro	SL-2	2366 Davis Street	94577	77A-649-8-62	1/31/2021	ALCO-03	Parapet Mastic	0.861	N
FY20-21	San Leandro	SL-2	2366 Davis Street	94577	77A-649-8-62	1/31/2021	ALCO-4	Parapet Mastic	0.214	N
FY20-21	San Leandro	SL-2	2366 Davis Street	94577	77A-649-8-62	1/31/2021	ALCO-5	Parapet Mastic	0.351	N
FY20-21	San Leandro	SL-2	2366 Davis Street	94577	77A-649-8-62	1/31/2021	ALCO-06	HVAC Caulking	29.6	N
FY20-21	San Leandro	SL-2	2366 Davis Street	94577	77A-649-8-62	1/31/2021	ALCO-07	Pink Fiberglass Insulation	0.177	N
FY20-21	San Leandro	SL-2	2366 Davis Street	94577	77A-649-8-62	1/31/2021	ALCO-08	Yellow Fiberglass Insulation	0.371	N
FY20-21	San Leandro	SL-2	2366 Davis Street	94577	77A-649-8-62	1/31/2021	ALCO-09	Interior Window Caulking	1.96	N
FY19-20	Fremont	Fre-1	39150 Fremont Blvd	94539	501-1130-001801, 501-1130-004803	1/2/2020		Baseboard Mastic	50	Y
FY19-20	Fremont	Fre-2	4274 & 4300 Peralta Blvd, Fremont, CA	94536	501 052602200501 052602100	5/4/2020		Carpet Mastic	7.5	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-01	Residual floor	29.1	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-02	Black	17	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-03	Black	6.9	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-04	Residual floor	4.4	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-05	Window, black	7.8	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-06	Yellow	ND	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-07	Black	13.3	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-08	Black	8.8	N

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FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-09	Black	660	Y
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-10	Black	10.1	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-11	Black	4.3	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-12	White	ND	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-13	Black	10.4	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-14	Expansion joint, gray	6660	Y
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-15	Expansion joint, gray	9600	Y
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-16	Expansion joint, gray	114.1	Y
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-101	Black	265	Y
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-102	Black	14	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-103	Door Closer Tile and Oil	0.3	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-104	Black	ND	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-105	Window, black	135	Y
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-106	Black	806	Y
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-107	Window, black	28.9	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-108	Black	5.2	N
FY19-20	Hayward	22300 City Center Dr.	22300 City Center Drive, Hayward	94541	415-0250-112-00	4/1/2020	PCC-109	Residual floor	66	Y
FY19-20	Hayward	Station	1401 West Winton Ave	94545	0	TBD	HSD-09	Black	1.1	N
FY19-20	Hayward	Station	1401 West Winton Ave	94545	0	TBD	HSD-10	Black	ND	N
FY19-20	Hayward	Station	1401 West Winton Ave	94545	0	TBD	HSD-11	Exterior, gray/tan	ND	N
FY19-20	Hayward	Station	1401 West Winton Ave	94545	0	TBD	HSD-12	Exterior, gray/tan	ND	N
FY19-20	Hayward	Station	1401 West Winton Ave	94545	0	TBD	HSD-13	Exterior, gray/tan	ND	N
FY19-20	Hayward	Station	1401 West Winton Ave	94545	0	TBD	HSD-14	White	ND	N
FY19-20	Hayward	Station	1401 West Winton Ave	94545	0	TBD	HSD-15	Pink	ND	N
FY19-20	Hayward	Station	1401 West Winton Ave	94545	0	TBD	HSD-16	Floor, yellow	ND	N
FY19-20	Hayward	Station	1401 West Winton Ave	94545	0	TBD	HSD-17	Floor, yellow	ND	N
FY19-20	Hayward	Station	1401 West Winton Ave	94545	0	TBD	HSD-18	Floor, yellow	ND	N
FY19-20	Hayward	Storage	1401 West Winton Ave	94545	0	TBD	HSD-19	Floor, yellow	16	N
FY19-20	Hayward	Storage	1401 West Winton Ave	94545	0	TBD	HSD-20	Floor, yellow	ND	N
FY19-20	Hayward	Storage	1401 West Winton Ave	94545	0	TBD	HSD-21	Floor, yellow	ND	N
FY19-20	Hayward	Training Building	1401 West Winton Ave	94545	0	TBD	HSD-01	Black	0.3	N
FY19-20	Hayward	Training Building	1401 West Winton Ave	94545	0	TBD	HSD-02	Black	0.64	N
FY19-20	Hayward	Training Building	1401 West Winton Ave	94545	0	TBD	HSD-03	white	0.15	N
FY19-20	Hayward	Training Building	1401 West Winton Ave	94545	0	TBD	HSD-04	white	0.36	N
FY19-20	Hayward	Training Building	1401 West Winton Ave	94545	0	TBD	HSD-05	Foam, yellow	14	N
FY19-20	Hayward	Training Building	1401 West Winton Ave	94545	0	TBD	HSD-06	Foam, yellow	21	N
FY19-20	Hayward	Training Building	1401 West Winton Ave	94545	0	TBD	HSD-07	Foam, yellow	16	N
FY19-20	Hayward	Training Building	1401 West Winton Ave	94545	0	TBD	HSD-08	white	0.26	N
FY19-20	Oakland	320 6th	320 6th St	94607	1-189-13	6/1/2020	316-320-Mastic-1	Floor tile mastic	ND	N
FY19-20	Oakland	320 6th	320 6th St	94607	1-189-13	6/1/2020	316-320-Mastic-2	Floor tile mastic	ND	N
FY19-20	Oakland	320 6th	320 6th St	94607	1-189-13	6/1/2020	316-320-Mastic-3	Floor tile mastic	ND	N
FY19-20	Oakland	320 6th	320 6th St	94607	1-189-13	6/1/2020	316-320-F-1	Fiberglass ceiling insulation	ND	N
FY19-20	Oakland	325 7th	325 7th St	94607	1-189-5	6/1/2020	325-7-F-1	Fiberglass HVAC Insulation	ND	N
FY19-20	Oakland	325 7th	325 7th St	94607	1-189-5	6/1/2020	325-7-F-2	Fiberglass ceiling insulation	ND	N
FY19-20	Oakland	325 7th	325 7th St	94607	1-189-5	6/1/2020	325-7-Caulk-1-1	Exterior door caulking	ND	N
FY19-20	Oakland	325 7th	325 7th St	94607	1-189-5	6/1/2020	325-7-Caulk-1-2	Exterior door caulking	ND	N
FY19-20	Oakland	325 7th	325 7th St	94607	1-189-5	6/1/2020	325-7-Caulk-1-3	Exterior door caulking	ND	N
FY19-20	Oakland	325 7th	325 7th St	94607	1-189-5	6/1/2020	325-7-Caulk-2-1	Exterior window caulking	ND	N
FY19-20	Oakland	325 7th	325 7th St	94607	1-189-5	6/1/2020	325-7-Caulk-2-2	Exterior window caulking	ND	N
FY19-20	Oakland	325 7th	325 7th St	94607	1-189-5	6/1/2020	325-7-Caulk-2-3	Exterior window caulking	ND	N
FY19-20	Oakland	330 6th	330 6th St	94607	1-189-14-1	6/1/2020	330-332-Caulk-1	Exterior Door Caulking	ND	N
FY19-20	Oakland	330 6th	330 6th St	94607	1-189-14-1	6/1/2020	330-332-Caulk-2	Exterior Door Caulking	ND	N
FY19-20	Oakland	330 6th	330 6th St	94607	1-189-14-1	6/1/2020	330-332-Caulk-3	Exterior Door Caulking	ND	N
FY19-20	Oakland	330 6th	330 6th St	94607	1-189-14-1	6/1/2020	330-332-F-1	Fiberglass ceiling lot insulator	ND	N
FY19-20	Oakland	330 6th	330 6th St	94607	1-189-14-1	6/1/2020	330-332-F-2	Fiberglass ceiling lot insulator	ND	N
FY19-20	Oakland	330 6th	330 6th St	94607	1-189-14-1	6/1/2020	330-332-Mastic-1	Floor Mastic	ND	N
FY19-20	Oakland	330 6th	330 6th St	94607	1-189-14-1	6/1/2020	330-332-Mastic-2	Floor Mastic	ND	N
FY19-20	Oakland	330 6th	330 6th St	94607	1-189-14-1	6/1/2020	330-332-Mastic-3	Floor Mastic	ND	N

ACCWP PCBs in Building Materials Management Program
List of Applicable Structures and Sampling Results

Reporting Year	Permittee	Building ID	Project Address	Project Zip Code	Project APN	Project Demolition Date	Sample ID	Sample Description	Reported Concentration (mg/kg)	Concentration ≥ 50 mg/kg (Y/N)
FY19-20	Oakland	625 Harrison St	625 Harrison St	94607	1-189-8	6/1/2020	625-H-F-1	Fiberglass duct workinsulation	ND	N
FY19-20	Oakland	GE Site - Pump House, North Window	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-PH-1B	Window glazing compound	5.9	N
FY19-20	Oakland	GE Site - Pump House, North Window	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-PH-2A	Sealant Around Window	9.2	N
FY19-20	Oakland	GE Site - Pump House, South Window	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-PH-1A	Window glazing compound	2.4	N
FY19-20	Oakland	GE Site - Slab A - Tank Saddle	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-A-1A	Sealant on Tank Saddle	39.4	N
FY19-20	Oakland	GE Site - Slab C	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-C-1A	Sealant around conduit	11	N
FY19-20	Oakland	GE Site - Slab G - Center	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-G-1A	Wooden expansion joint material	125	Y
FY19-20	Oakland	GE Site - Slab G - North End	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-G-1B	Wooden expansion joint material	25	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-1A	Interior window caulking	10.43	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-1B	Interior window caulking	26.4	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-1C	Interior window caulking	46	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-1D	Interior window caulking	8.3	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-1E	Interior window caulking	4.81	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-1F	Interior window caulking	82	Y
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-1G	Interior window caulking	11.6	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-1H	Interior window caulking	38.75	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-1I	Interior window caulking	89	Y
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-8A	Batt Insulation	3.3	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-8B	Batt Insulation	1.09	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-8C	Batt Insulation	0.6	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-9A	Ceiling	8.6	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-9B	Ceiling	6	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-9C	Ceiling	5.2	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-3A	HVAC Duct Sealant	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-3B	HVAC Duct Sealant	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-3C	HVAC Duct Sealant	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-2A	Flooring adhesive	39	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-2B	Flooring adhesive	129	Y
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-2C	Flooring adhesive	174	Y
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-5A	Roof penetration mastic	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-5B	Roof penetration mastic	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-5C	Roof penetration mastic	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	C-B1-1	Concrete Slab	54	Y
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-4A	Expansive joint material	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-4B	Expansive joint material	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-4C	Expansive joint material	35	N

Reporting Year	Permittee	Building ID	Project Address	Project Zip Code	Project APN	Project Demolition Date	Sample ID	Sample Description	Reported Concentration (mg/kg)	Concentration ≥ 50 mg/kg (Y/N)
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-6A	Expansive joint material	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-6B	Expansive joint material	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-6C	Expansive joint material	ND	N
FY19-20	Oakland	GE Site BLD - 01	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B1-7A	Expansive joint material	ND	N
FY19-20	Oakland	GE Site BLD - 04	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B4-1A	Flooring adhesive	66.1	Y
FY19-20	Oakland	GE Site BLD - 04	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B4-1B	Flooring adhesive	85	Y
FY19-20	Oakland	GE Site BLD - 04	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	C-B4-1	Concrete Slab	3.4	N
FY19-20	Oakland	GE Site BLD - 08	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B8-1A	Rubber Gasket	56	Y
FY19-20	Oakland	GE Site BLD - 18	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B18-1A	Wooden expansion joint material	61	Y
FY19-20	Oakland	GE Site BLD - 18	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B18-1B	Wooden expansion joint material	46	N
FY19-20	Oakland	GE Site BLD - 18	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B18-1C	Wooden expansion joint material	31.5	N
FY19-20	Oakland	GE Site BLD - 20	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B21-1A	Felt at Tank Saddles, Black	58	Y
FY19-20	Oakland	GE Site BLD - 20	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B21-1B	Felt at Tank Saddles, Black	104	Y
FY19-20	Oakland	GE Site BLD - 20	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B21-1C	Felt at Tank Saddles, Black	44	N
FY19-20	Oakland	GE Slab Building 6- Between B4/B6	5441 International Boulevard	94601	041-3848-001-00	6/15/2020	B-B6-1A	Expansive joint material	0.46	N
FY19-20	Oakland	Port BLD - 01	7200 Earhart Rd	0	42-4404-3	11/10/2019	PCB700	Exterior wall seam sealant - West wall	537000	Y
FY19-20	Oakland	Port BLD - 01	7200 Earhart Rd	0	42-4404-3	11/10/2019	PCB701	Exterior wall seam sealant - north wall	432000	Y
FY19-20	Oakland	Port BLD - 01	7200 Earhart Rd	0	42-4404-3	11/10/2019	PCB702	Exterior wall seam sealant - north wall	426000	Y
FY19-20	Oakland	Port BLD - 01	7200 Earhart Rd	0	42-4404-3	11/10/2019	PCB703	Paint exterior - North wall	190	Y
FY19-20	Oakland	Port BLD - 03	6701 Earhart Rd	0	42-4404-11-2	11/10/2019	PCB900	Exterior tan paint on corrugated metal - east wll	15.3	N
FY19-20	Oakland	Port BLD - 03	6701 Earhart Rd	0	42-4404-11-2	11/10/2019	PCB901	exterior blue paint on roll up doors and door frame - east wall	5.8	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Grey Window Caulk	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Grey Window Caulk	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Grey Window Caulk	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Grey Window Caulk	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Grey Concrete Sealant	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Grey Concrete Sealant	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Grey concrete Sealant	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Black Flashing Mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Black Flashing Mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Black Flashing Mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Black Flashing Mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Black Flashing Mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Black Flashing Mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Black Flashing Mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Yellow floor tile mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Yellow floor tile mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Yellow floor tile mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Yellow and black floor tile mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		Yellow and black floor tile mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		FRP mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		FRP mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		FRP mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		FRP mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		FRP mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		FRP mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		FRP mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		FRP mastic	ND	N
FY19-20	San Leandro	AC-1	1159 Beecher Street	94577	77A-675-20	8/1/2020		FRP mastic	ND	N

APPENDIX D

Mass of Mercury Recycled in Alameda County

Memorandum

Date: August 23, 2024
To: Sandy Mathews, Alameda Countywide Clean Water Program
From: Lisa Austin, Senior Principal, Lisa Welsh, Senior Scientist, and Grace Yao,
Professional Engineer
Subject: C.11.d Mercury Collection and Recycling Program – Fiscal Year 2023/24 Data
Summary
Geosyntec Project Number: CWR0948

1. BACKGROUND

Municipal Regional Stormwater Permit (MRP; Order No. R2-2022-0018) Provision C.11.d requires Permittees to promote, facilitate, and/or participate in collection and recycling of mercury-containing consumer products, devices, and equipment.

The Alameda Countywide Clean Water Program's (ACCWP) Permittees collect household hazardous waste (HHW) at multiple locations via StopWaste, a public agency governed by the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council. Data was also compiled from the Fremont HHW facility and the Dublin-operated Temporary Household Hazardous Waste Collection Facility (THHWCF) events.

This technical memorandum documents the following items for the Alameda County Permittees, as required by MRP Provision C.11.d.iii.(1):

- a. The mass of mercury-containing material collected throughout the region; and
- b. The estimate of the mass of mercury contained in the recycled material.

2. MERCURY-CONTAINING MATERIAL DEVICE TYPES

The following mercury-containing devices are collected and recycled by StopWaste on behalf of the ACCWP permittees. The estimated total mass and mercury mass of each device type are provided below. The estimated mercury mass is consistent with the Source Control Load Reduction Accounting for Reasonable Assurance Analysis report (BASMAA 2022).

1. Fluorescent Lamps.

- Estimated Mass: Each 4-ft-long fluorescent lamp is assumed to weigh 0.227 kilograms (kg) (0.5 lbs) (MASS 2007). Using this value, the unit weight of a fluorescent lamp per foot is estimated to be 0.057 kg.
- Estimated Mercury Mass: The average mercury content for a four-foot linear fluorescent lamp is 8.3 milligrams (mg). This is equal to 2.075 mg (2.075×10^{-6} kilograms (kg)) per linear foot. (NEMA 2005)

2. Compact Fluorescent Lamps (CFLs).

- Estimated Mass: The weight of a single CFL is assumed to be 0.1 kg (0.22 lbs) based on the product information found under general hardware stores. (Philips 2023a)
- Estimated Mercury Mass: The National Electrical Manufacturers Association (NEMA) announced that under the new voluntary commitment, effective October 1, 2010, participating manufacturers will cap the total mercury content in CFLs that are under 25 watts at 4 mg per unit, and CFLs that use 25 to 40 watts of electricity will be capped at 5 mg per unit. Each CFL recycled is assumed to have an average mass of 4.5 mg (4.5×10^{-6} kg). New CFLs are also assumed to have 4.5 mg on average. (NEMA 2010)

3. High Intensity Discharge Lamps (HID).

- Estimated Mass: The weight of a single HID lamp is assumed to be 0.32 kg (0.7 lbs). (Philips 2023b)
- Estimated Mercury Mass: The average content of an HID bulb is 0.5 milligrams (mg) of mercury (0.5×10^{-6} kg). (NEMA 2004)

4. Thermostats.

- Estimated Mass: The average weight of one thermostat is approximately 0.34 kg (0.75 lbs). (TRC 2008)
- Estimated Mercury Mass: The amount of mercury in a thermostat is determined by the number of ampoules. There are generally one or two ampoules per thermostat (average is about 1.4) and each ampoule contains an average of 2.8 grams (g) of mercury. Therefore, each thermostat recycled is assumed to contain approximately 4.0 g (4×10^{-3} kg) of mercury. Every pound of thermostat collected is then estimated to contain around 5.3×10^{-3} kg of mercury. (TRC 2008)

5. Thermometers.

- Estimated Mass: Each glass mercury fever thermometer is assumed to weigh 0.05 kg (0.11 lbs). (Walmart 2023)

- Estimated Mercury Mass: USEPA reports that glass mercury fever thermometers contain about 0.61 g (6.1×10^{-4} kg) of mercury. (USEPA 2012)
- 6. **Switches**. The Recycling Corporation reports that one mercury switch (from thermostats) contains 2.87 g (2.87×10^{-3} kg) of mercury¹. (TRC 2010)
- 7. **Elemental Mercury**. Mercury collected in elemental form and measured in kg.

3. MASS OF MERCURY-CONTAINING MATERIAL RECYCLED

Table 1 lists the estimated total mass and mercury mass of mercury-containing material recycled within Alameda County during Fiscal Year (FY) 2023/24 (i.e., from July 1, 2023 – June 30, 2024) based on data available at the time this memorandum was prepared and for the device types listed above. Data reported is the estimated total mass of mercury-containing material shipped from Alameda County-operated HHW facilities and Alameda County-operated THHWCFs.

The mass of mercury recycled was estimated using the unit conversions listed above for total mass and mercury mass for each device type. The total estimated amount of mercury collected in Alameda County in FY 2023/24 was 70.0 kg, with the majority in the form of elemental mercury.

Table 1: Summary of Mercury Mass Collected in FY 2023/24

Mercury-containing Device/Equipment	Estimated Mass of Mercury-Containing Material Recycled (kg)	Estimated Mass of Mercury Recycled (kg)
Fluorescent Lamps ^[1]	28,787	1.1
CFLs ^[2]	9,396	0.4
HID Headlamps	826	<0.00
Thermostats	26	0.3
Thermometers ^[3]	92	1.1
Switches ^[4]	0	0
Elemental Mercury	67	67.1
Total Mass Recycled During FY 2023/24	39,194	70.0

^[1] Only linear fluorescent lamps included.

^[2] Only compact fluorescent lamps included.

^[3] Data from thermometers and switches are grouped together for Dublin's HHW events and are reported as thermometers herein.

^[4] Only switches removed from thermostats should be included.

During FY 2023/24, Alameda County also received additional data from the Fremont HHW facility and the Dublin-operated THHWCF on the total mass of mercury-containing material collected in FY 2022/23. The total estimated amount of mercury collected in FY 2022/23

¹ Mercury switches are also found in appliances, automobiles, homes, and industrial equipment. The mercury content varies from 1 to more than 200 grams each. For the purpose of this report, 2.87 g or mercury per switch is used for the calculation.

increased from 22.9 kg to 63.8 kg due to the update. The revised summary of mercury mass collected in FY 2022/23 is shown in Table 2.

Table 2: Revised Summary of Mercury Mass Collected in FY 2022/23

Mercury-containing Device/Equipment	Estimated Mass of Mercury-Containing Material Recycled (kg)	Estimated Mass of Mercury Recycled (kg)
Fluorescent Lamps ^[1]	27,874	1.0
CFLs ^[2]	8,950	0.4
HID Headlamps	617	<0.00
Thermostats	18	0.2
Thermometers	38	0.5
Switches ^[3]	0	0
Elemental Mercury	61	61.7
Total Mass Recycled During FY 2022/23	37,558	63.8

^[1] Only linear fluorescent lamps included.

^[2] Only compact fluorescent lamps included.

^[3] Data from thermometers and switches are grouped together for Dublin's HHW events and are reported as thermometers herein.

^[3] Only switches removed from thermostats should be included.

4. REFERENCES

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