
**PROPERTY MANAGEMENT PLAN
FOR THE CANNABIS CULTIVATION OPERATION AT
14507 WESTERN MINE ROAD, MIDDLETOWN, CALIFORNIA**

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1.0 INTRODUCTION

This Property Management Plan has been prepared to fulfill the requirements of Ordinance No. 3084 of the Lake County Code which pertains to commercial Cannabis cultivation. This Property Management Plan, and all the sub-plans, have been prepared using the guidance in Subsection 5 of Ordinance No. 3073. The Ordinance describes the Plan as follows:

“All permittees shall prepare a Property Management Plan. The intent of said plan is to identify and locate all existing cannabis and non-cannabis related uses on the property, identify and locate all proposed cannabis and non-cannabis related uses on the property, and describe how all cannabis and non-cannabis related uses will be managed in the future. The property management plan shall demonstrate how the operation of the commercial cannabis cultivation site will not harm the public health, safety, and welfare or the natural environment of Lake County. “

Ordinance No. 3084, Section 4, Subsection 2 i (d) (11), states that the applicant must prepare a “Written Description”:

“A statement of the applicant’s proposal for solid waste disposal, vegetative waste disposal, storm water management, fish and wildlife protection, water resources protection, energy use, water use, pest management, fertilizer use, property management, grading, organic farming, and protection of cultural resources.”

This Property Management Plan fulfills the requirements for the “Written Description.”

This Plan is intended to be a “living” document, updated as necessary, such that when operational activities or processes are modified or replaced, the applicable sub-plans are revised to reflect these changes. Relevant sub-plans should also be amended whenever the goals of the Plan are not met, whenever a significant pollution event or other non-compliance event occurs, or whenever a violation notice is issued.

2.0 PROPERTY LOCATION AND PROJECT DESCRIPTION

The proposed project is a Cannabis cultivation operation located on a 82-acre parcel (APN: 013-030-290-000) at 14507 Western Mine Road, Middletown, California. A single-family house with an attached garage is located on the property. The flat area where the house was built in 1997 was previously graded in order to test the feasibility for geothermal electrical generation. Testing indicated that the site was not suitable for power generation and the property was sold. Other existing improvements include a well with electric pump and backup gasoline pump, several water storage tanks, a propane tank and heating oil tank, PG&E electrical service, a septic system, and a tennis court.

The Project Area consists of several features and is in total approximately 1.0 acres. No additional grading and no tree removal are currently planned in order to develop the cannabis cultivation operation. The proposed fenced Cannabis garden will be approximately 1.0 acre with, 0.5-acres in 2020 and 1-acre in 2021, and will be located to the southeast of the house, surrounding the tennis court. Cannabis starts will be planted in cubic yard cloth sacks ("smart pots") that will be placed on top the ground. All soil/potting medium will be imported.

Proposed ancillary facilities consist of Conex box and/or storm proof shed for material storage and product processing. An existing garage associated with the house may be used for security monitoring. A water tank (2,500-gallon) will be placed within the Project Area near or within the fenced garden area, connected to the existing water supply system, and used for irrigation of the cannabis plants. A smaller mixing tank maybe used to inject fertilizer into the irrigation system. Drip irrigation will be used.

2.1. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

3.0 GRADING

3.1. Rules and Regulations

The Lake County Grading Ordinance (Chapter 30 of the Lake County Code) states that a grading permit is needed if the volume of soil that is graded is 50 cubic yards or more or if 1 acre of native vegetation is cleared.

The State Water Resources Control Board's *Order WQ 2019-0001-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (Cannabis General Order)

The Cannabis General Order's Attachment A has specific requirements for site development and site expansion, including, but not limited to, the following:

- *A California Licensed Timber Operator shall be used if any commercial tree species are to be removed from the cannabis cultivation site. All timberland conversions shall be permitted and compliant with the Forest Practice Rules and CAL FIRE permitting requirements.*
- *Prior to commencing any cannabis land development or site expansion activities the cannabis cultivator shall secure a qualified biologist. The cannabis cultivator and the Qualified Biologist shall consult with CDFW and CAL FIRE and designate and mark a no-disturbance buffer to protect identified sensitive plant and wildlife species and communities.*
- *Prior to land disturbance activities for new or expanded cannabis cultivation activities, the cannabis cultivator shall perform a records search of potential Native American archeological or cultural resources (CHRIS potential discovery) at a California Historical Resources Information System (CHRIS) information center. A CHRIS qualified archaeologist shall perform the records search and document the results.*
- *In timberland areas, unless authorized by CAL FIRE or the Regional Water Board Executive Director, Cannabis cultivators shall not remove trees within 150 feet of fish bearing water bodies or 100 feet of aquatic habitat for non-fish aquatic species (e.g., aquatic insects) (Public Resources Code section 4526.)*
- *All grading and earthwork shall be done by a state-licensed C-12 Earthwork and Paving contractor, as applicable.*

The Cannabis General Order also states:

"To avoid water quality degradation from erosion and sedimentation, land disturbance activities shall only occur between April 1 and November 15 of each year, unless authorized by a Regional Water Board Executive Officer-approved work plan and compliance schedule. Cannabis cultivators shall ensure land disturbance activities are completed and site stabilization measures are in place prior to the onset of fall and winter precipitation. All land disturbance activities between November 16 and March 31 shall be supervised by a Qualified Professional (such as an appropriately certified or registered Storm Water Pollution Prevention Plan Practitioner)."

3.2. Project-related Grading Activities

The cultivation areas were designed to be located primarily on areas previously graded and cleared of vegetation for former agricultural operations. If establishment of the cultivation operations require extensive grading, a grading permit will first be obtained. An erosion and sediment control plan has already been created and will be implemented for this project. Should extensive grading be performed, the erosion and sediment control plan should be updated.

The flat area where the house was built in 1997 was previously graded in order to test the feasibility for geothermal electrical generation. Testing indicated that the site was not suitable for power generation and the property was sold. The Project Area consists of several features and is in total approximately 1.0 acres. No additional grading and no tree removal are currently planned in order to develop the cannabis cultivation operation. The proposed fenced Cannabis garden will be approximately 1.0 acre, with 0.5-acre in 2020 and 1-acre in 2021, and will be located to the southeast of the house, surrounding the tennis court.

4.0 AIR QUALITY MANAGEMENT PLAN

4.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Air Quality:

- (a) Intent: All cannabis permittees shall not degrade the County's air quality as determined by the Lake County Air Quality Management District (LCAQMD).*
- (b) In this section permittees shall identify any equipment or activity that which may cause, potentially cause the issuance of air contaminants including odor, and shall identify measures to be taken to reduce, control or eliminate the issuance of air contaminants, including odors.*
- (c) All cannabis permittees shall obtain an Authority to Construct permit pursuant to LCAQMD Rules and Regulations, prior to the construction of the facility described in the Property Management Plan.*
- (d) All cannabis permittees shall obtain Authority to Construct Permit pursuant to LCAQMD Rules and Regulations, if applicable, to operate any article, machine, equipment or other contrivance which causes or may cause the issuance of an air contaminant.*
- (e) All permittees shall maintain an Authority to Construct or Permit to Operate for the life of the project, until the operation is closed and equipment is removed.*
- (f) The applicant shall prepare an odor response program that includes (but is not limited to):*
 - a. Designating an individual(s) who is/are responsible for responding to odor complaints 24 hours per day/seven (7) days a week, including holidays.*
 - b. Providing property owners and residents of property within a 1,000 foot radius of the cannabis facility, with the contact information of the individual responsible for responding to odor complaints.*
 - c. Policies and procedures describing the actions to be taken when an odor complaint is received, including the training provided to the responsible party on how to respond to an odor complaint.*
 - d. The description of potential mitigation methods to be implemented for reducing odors, including add-on air pollution control equipment.*
 - e. Contingency measures to mitigate/curtail odor and other emissions in the event the methods described above are inadequate to fully prevent offsite nuisance conditions.*

The following Air Quality Study was prepared for this project and is bound separately:

- Natural Investigations Co. 2019. Air Quality Impact Assessment for the Cannabis Cultivation Operations at 14507 Western Mine Road, Middletown, California.

4.2. Air Quality Setting and Potential Pollutant Sources

The project is in the Lake County Air Basin. The Lake County Air Quality Management District (LCAQMD) regulates air quality in Lake County. The U.S. Environmental Protection Agency (EPA) sets acceptable levels for seven air pollutants, and then determines — with the help of states and local air districts — where those standards are or are not met. Lake County currently meets the EPA's health standards for five of those pollutants: carbon monoxide; nitrogen dioxide; sulfur dioxide; lead; and coarse particulates. For the other two — ground-level ozone and fine particulate pollution — Lake County is considered to be a part of a regional non-attainment area.

Sensitive receptors: There are no sensitive receptors nearby. The nearest residence is located approximately 1,000 feet to the west. Public facilities such as schools and churches are greater than 2 miles away.

Short-term grading or construction emissions produces fugitive dust and other particulate matter, as well as exhaust emissions generated by earthmoving activities from operation of tractors, tillers, etc., during site preparation. Construction emissions are caused by onsite or offsite activities. Onsite emissions principally consist of exhaust emissions (NOX, CO, ROG, PM10,

and PM2.5) from heavy-duty construction equipment, motor vehicle operation, and fugitive dust from disturbed soil. Offsite emissions are caused by motor vehicle exhaust from delivery vehicles as well as worker commuter traffic, but they also include road dust (PM10). However, no grading and no major construction-related activities are needed for implementation of the proposed cultivation operations. Only a few persons working for a few days will be needed for site preparation, and such low numbers of man-hours would not generate significant vehicle emissions.

Operational emission sources consist of mobile emissions and area source emissions. Mobile source emissions estimates are derived from motor vehicle traffic from staff commuting. Area source emissions estimates are derived from the consumption of propane, electricity, and consumer products, as well as emissions resulting from landscape maintenance. However, this cultivation operation does not require the use of propane, electricity, or other consumer products. Cultivation operations may generate fugitive dust emissions through ground-disturbing activities such as ground tilling, uncovered soil or compost piles, and vehicle or truck trips on unpaved roads. Electrical generators will only be used to supply temporary electrical service during emergencies.

Operation of the proposed cultivation operation would generate small amounts of carbon dioxide from operation of small engines, such as tillers, and from vehicular traffic associated with staff commuting. The generation of carbon dioxide would be partially offset by the cultivation of fast-growing Cannabis plants, which remove carbon dioxide in the air during photosynthesis. The proposed cultivation operations would not consume excessive amounts of energy because they primarily utilize the natural sun for light.

CDFA (2017) concluded that cannabis cultivation activities under the CalCannabis Licensing Program would not generate a substantial number of vehicle trips and would not require intensive use of heavy equipment, and as such, would not degrade air quality or produce significant amounts of greenhouse gasses. CDFA (2017) summarizes the impacts from small cannabis cultivation operations as follows:

“Despite the potential air quality emission-generating sources described above that are associated with cannabis cultivation activities, it is not anticipated that the Proposed Program would conflict with or obstruct implementation of air quality plans for the numerous reasons outlined below. First, the cannabis cultivation activities under the Proposed Program would not be anticipated to generate a substantial number of vehicle trips (see Section 4.12, Transportation and Traffic) that would affect air quality. In addition, outdoor and mixed-light cultivation activities would generally occur on such small acreages that these activities would often not require intensive use of heavy equipment.” (page 4.3-30)

The CDFA CalCannabis Program concluded that small outdoor Cannabis cultivation operations would not contribute significantly to greenhouse gas emissions because of the limited use of combustion-powered equipment and vehicles and because County ordinances limit the use of generators to emergency use only (CDFA 2017).

An air quality impact assessment was performed for this project by Natural Investigations Co. (2019). Construction emissions and operational emissions were calculated using the California Emissions Estimator Model (CalEEMod)®, Version 2016.3.2 (California Air Pollution Control

Officers Association, 2017). Model output and reports from CalEEMod are provided in the appendix of the air quality assessment. Default values were used unless otherwise indicated.

Results / Emissions Estimates

Construction and operational emissions are summarized in the following tables. The results are expressed as a range of potential emissions, because exact project details are not available yet. To magnify any air quality impacts, the model was run using the worst-case scenarios, and emissions estimates are reported here using the unmitigated emissions values. The main sources of construction emissions are exhaust from heavy equipment and tailpipe emissions from cars and trucks. In the operational phase, no direct emissions will occur. Electrical consumption will contribute incrementally to greenhouse gas generation.

Lake County has adopted the Bay Area Air Quality Management District (BAAQMD) thresholds of significance as a basis for determining the significance of air quality and GHG impacts. Air emissions modeling performed for this project demonstrates that the project, in both the construction phase and the operational phase, will not generate significant quantities of ozone or particulate matter and does not exceed the project-level thresholds established by FRAQMD.

Comparison of Daily Construction Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions unmitigated (pounds/day)	BAAQMD Threshold (pounds/day)	Significance
ROG (VOC)	1 to 10	54	Less than significant
NO _x	10 to 20	54	Less than significant
CO	10 to 30	548	Less than significant
SO _x	< 1	219	Less than significant
Exhaust PM ₁₀	1 to 5	82	Less than significant
Exhaust PM _{2.5}	1 to 5	54	Less than significant
Greenhouse Gasses (CO _{2e})	2,000 to 3,000	No threshold established	Less than significant

Comparison of Daily Operational Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions unmitigated (pounds/day)	BAAQMD Threshold (pounds/day)	Significance
ROG (VOC)	1 to 10	54	Less than significant
NO _x	1 to 5	54	Less than significant
CO	1 to 10	548	Less than significant
SO _x	< 1	219	Less than significant
PM ₁₀ (total)	1 to 2	82	Less than significant
PM _{2.5} (total)	1 to 2	54	Less than significant
Greenhouse Gasses (CO _{2e})	1 to 10	No threshold established	Less than significant

Comparison of Annual Operational Emissions Impacts with Thresholds of Significance

Criteria Pollutants	Project Emissions (tons/year)	BAAQMD Threshold (tons/year)	Significance
ROG (VOC)	0 to 1	10	Less than significant
NO _x	0 to 1	10	Less than significant
CO	0 to 1	100	Less than significant
SO _x	0 to 1	40	Less than significant
PM ₁₀	0 to 1	15	Less than significant
PM _{2.5}	0 to 1	10	Less than significant
Greenhouse gasses (as CO ₂ or methane)	1 to 100	10,000	Less than significant

4.3. Permits

According to the Ordinance:

"All cannabis permittees shall obtain Authority to Construct Permit pursuant to LCAQMD Rules and Regulations, if applicable, to operate any article, machine, equipment or other contrivance which causes or may cause the issuance of an air contaminant, prior to the construction of the facility described in the Property Management Plan. All permittees shall maintain an Authority to Construct or Permit to Operate for the life of the project, until the operation is closed and equipment is removed."

Air permits from the LCAQMD may be necessary to operate these proposed facilities if regulated machines or equipment are used. For Cannabis operations, examples would use of electricity generators. The Ordinance prohibits the regular use of electrical generators for Cannabis cultivation; properly permitted generators may be used for emergency backup power for mixed light and indoor cultivation operations.

No LCAQMD permits are necessary to construct or operate the project as currently designed. Any LCAQMD permits obtained should be listed in this Plan.

4.4. Dust Management

Cultivation operations may generate fugitive dust emissions through ground-disturbing activities such as ground tilling, uncovered soil or compost piles, and vehicle or truck trips on unpaved roads. The following are mitigation measures that can be used to control dust. Staff should be informed of speed limits and dust pollution. The roadways may be clearly marked for limited speed to control dust. Dusty road segments can be armored with gravel, roadbase, or asphalt. A road maintenance program should be implemented. On tilled earth and stockpiles, fugitive dust can be controlled by wetting the soil with a mobile water tank and hose, or by delaying ground disturbing activities until site conditions are not windy. Water applications may be concentrated during the late summer and early fall months, when soils have the lowest moisture content or when winds are severe. BMP Fact Sheets WE-1: Wind Erosion Control and NS-1: Water Conservation Practices will be implemented to provide dust control and prevent discharges from dust control activities and water supply equipment. Water application rates will be minimized as necessary to prevent runoff and ponding and water equipment leaks will be repaired immediately. During windy conditions (forecast or actual wind conditions of 25 miles per hour or greater), dust control may be applied to disturbed areas, including haul roads, to adequately control wind erosion. BMP Factsheet WM-3: Stockpile Management will be implemented using silt fences and plastic covers to prevent wind dispersal of sediment from stockpiles. The minimum amount of water should be used: refer to BMP Factsheet NS-1: Water Conservation Practices.

4.5. Odor Response Program

According to the Ordinance:

"a. Designating an individual(s) who is/are responsible for responding to odor complaints 24 hours per day/seven (7) days a week, including holidays.

b. Providing property owners and residents of property within a 1,000 foot radius of the cannabis facility, with the contact information of the individual responsible for responding to odor complaints.

- c. Policies and procedures describing the actions to be taken when an odor complaint is received, including the training provided to the responsible party on how to respond to an odor complaint.*
- d. The description of potential mitigation methods to be implemented for reducing odors, including add-on air pollution control equipment.*
- e. Contingency measures to mitigate/curtail odor and other emissions in the event the methods described above are inadequate to fully prevent offsite nuisance conditions.”*

The individual(s) that are responsible for responding to odor complaints are:

- Lauren and Amy Goodman; phone 707-813-0661; email ldsgoodman@gmail.com
- _____

There are no property owners or residents of property within a 1,000 foot radius of these cannabis facilities.

When an odor complaint is received, it will be forwarded to the manager responsible for odor control. The complaint will be logged, including time and type of complaint, the location of the odor reception, and contact info of the person making the complaint. The incident will be investigated and the problem identified. The manager will visit the site or facility in question and determine any deficiencies in the odor control system (where applicable) and identify remedies. These remedies should be implemented immediately. The manager will prepare a written response and send it by certified mail to the person who made the complaint. The correspondence should acknowledge the complaint, describe the incident, and identify what remedial actions were taken. Each odor complaint will be logged in a master odor complaint log book.

4.5.1. Odor Mitigation

Cannabis cultivation, especially during the flowering phase, generates volatile compounds (terpenes) that some people find objectionable. No significant odor impacts are anticipated from this cultivation operation, due to the limited population in the area, the small size of the cultivation operation, the setbacks from roads and property lines, and wind dilution/dispersal effects.

If odors become problematic, odor mitigation must be implemented. The cultivation operation should be analyzed to determine the source of odor emission and any concentrating effects. Mitigation can include some combination of the following:

- Windscreens could be erected that could partially contain odors within the cultivation compound.
- Powerful fans could be installed to guide air flow in the opposite direction.
- Alterations to atmospheric controls (temperature, air exchange, humidity) using dehumidifier, HVAC system, and/or fans.
- A high-pressure atomizing system could be installed on the perimeter. This system generates a water vapor (aerosol) that binds with the volatile compounds from Cannabis (terpenes) and makes them heavier, and then they drop out of the air.
- Charcoal (or activated carbon) filtration is an effective odor neutralizer for indoor cultivation operations. Air is mechanically drawn through the charcoal filters, then the Cannabis chemicals are bound to the carbon, and then clean air is expelled from the greenhouse.

- An ozone generator. Ozone destroys volatile compounds upon contact.

5.0 CULTURAL RESOURCES

5.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Cultural Resources:

- (a) Intent: All permittees shall protect the cultural, historical, archaeological, and paleontological resources on the lot of record where the permitted activity is located.*
- (b) The Department shall consult with appropriate Tribe regarding the potential of such resources being located on the lot of record.*
- (c) Based on that consultation, the Department may require a cultural resource study of the property to determine the extent such resources exist on the lot of record.*
- (d) Based on that study and in consultation with the appropriate Tribe(s), the Department may require the inclusion in this section.*
- (e) This section shall include:*
 - a. Detailed procedures on actions to take if such resources are found.*
 - b. Describe the procedures to be followed if cultural, historical, archaeological, and paleontological resources are found on the property.*

5.2. Cultural Resources Assessment

The following Cultural Resources Assessment was performed for this project and is bound separately:

- Natural Investigations Co. 2019. Cultural Resources Assessment for the Cannabis Cultivation Operation at 14507 Western Mine Road, Middletown, Lake County, California. 24 pp.

Cultural resources literature searches were conducted at the Northwest Information Center (NWIC) of the California Historical Resources Information System at Sonoma State University to determine if prehistoric or historic cultural resources were previously recorded within the project area, the extent to which the project area had been previously surveyed, and the number and type of cultural resources within a 0.25-mile radius of the project limits. A literature search was completed by the Northwest Information Center on December 11, 2019. The archival search of the archaeological and historical records, national and state databases, and historic maps included:

- National Register of Historic Places: listed properties
- California Register of Historical Resources: listed resources
- Historic Property Data File (HPDF) for Lake County
- Archaeological Determinations of Eligibility (ADOE)
- California Inventory of Historical Resources
- California Historical Landmarks
- California Points of Historical Interest

The records search at the NWIC indicates one prior study has been completed which included the project area, and one additional report has been completed outside the Project Area but within the 0.25-mile search radius. No cultural resources have been previously recorded within the project area or 0.25-mile search radius. The Sacred Lands File search on December 2, 2019 returned negative results for Native American cultural resources within the Project vicinity. No cultural resources were identified during the field survey.

Based on the results of the records searches, field survey, and assessment of potential direct or indirect project impacts, no additional cultural resources work is recommended at this time. Construction monitoring of any ground-disturbing activity is thus not recommended.

5.3. Protective measures

Protective measures consist primarily of minimizing ground disturbance, especially in sensitive areas. For this property, sensitive areas are areas that have not previously been tilled or graded, and primarily those areas that are near streams. Note that the riparian zones of streams are also protected under various federal, state, and county regulations. Another protective measure is worker awareness training. During training events, workers should be made aware of the regulations protecting cultural resources, the location of sensitive areas, and indicators of buried historic or archaeological resources or human remains, such as fragments of bone, shells, or pottery, unusual odors or staining of soil, building foundations, etc.

5.4. Inadvertent Discovery Work Plan

An Inadvertent Discovery Work Plan is only required by the County for properties known to have cultural resources. No cultural resources are known to occur within, or adjacent to, the cultivation areas. Nevertheless, Inadvertent Discovery Measures are provided here and will be implemented, and are taken directly from the California Department of Food and Agriculture's Program Environmental Impact Report (2017) prepared for the CalCannabis Cultivation Licensing program:

"Existing cultivation activities themselves would generally have limited potential for adverse impacts on cultural resources. However, cultivation may involve excavation within soil that has not been disturbed previously. As such, while considered unlikely, excavation could encounter buried historic or archaeological resources or human remains. A mitigation measure—CR-1—was added that would ensure that any unexpected discoveries of cultural resources during cultivation do not result in significant impacts.

It is also considered unlikely that cultivation itself would result in modification or demolition of historic structures that could affect the characteristics that make the building eligible for listing in the CRHR; such impacts would be more likely to occur as part of site development and, as a result, would be evaluated by the local agency during its approval process for site development. In addition, the CalCannabis Licensing Program's environmental protection measures related to cultural resources, specifically the accidental discovery of human remains (Section 8313[c] of the proposed regulations), would require applicants to halt cultivation activities and implement Health and Safety Code Section 7050.5 if human remains were discovered.....

Mitigation Measure CR-1: *Suspend Cultivation Immediately if Cultural Resources Are Discovered, Evaluate All Identified Cultural Resources for CRHR Eligibility, and Implement Appropriate Mitigation Measures for Eligible Resources.*

Not all cultural resources are visible on the ground surface. As a result, before initiation of ground-disturbing activities, the licensee shall arrange for cultivation employees to

receive training about the kinds of archaeological materials that could be present at the cultivation site and the protocols to be followed should any such materials be uncovered during cultivation. Training shall be conducted by an archaeologist who meets the U.S. Secretary of the Interior's professional standards. Training shall be required during each phase of cultivation to educate new cultivation personnel.

If any cultural resources, including structural features, unusual amounts of bone or shell, flaked or ground stone artifacts, historic-era artifacts, human remains, or architectural remains, are encountered during cultivation activities, work shall be suspended immediately at the location of the find and within a radius of at least 50 feet and the appropriate jurisdiction will be contacted.

All cultural resources uncovered during cultivation within the site shall be evaluated for eligibility for inclusion in CRHR. Resource evaluations shall be conducted by individuals who meet the U.S. Secretary of the Interior's professional standards in archaeology, history, or architectural history, as appropriate. If any of the resources meet the eligibility criteria identified in PRC Section 5024.1 or State CEQA Guidelines Section 21083.2(g), mitigation measures will be developed and implemented in accordance with State CEQA Guidelines Section 15126.4(b) before cultivation resumes.

For any resources eligible for listing in the CRHR that would be significantly adversely affected by cultivation, additional mitigation measures shall be implemented. Mitigation measures for archaeological resources may include (but are not limited to) avoidance; incorporation of sites within parks, greenspace, or other open space; capping the site; deeding the site into a permanent conservation easement; or data recovery excavation. Mitigation measures for archaeological resources shall be developed in consultation with responsible agencies and, as appropriate, interested parties such as Native American tribes. Implementation of the approved mitigation is required before resuming any cultivation activities with the potential to affect identified eligible resources at the site."

6.0 ENERGY USAGE

6.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Energy Usage:

(a) Intent: Permittees shall minimize energy usage.

(b) In this section permittees shall:

- a. Provide energy calculation as required by the California Building Code*
- b. Identify energy conservation measures to be taken and maintained including providing proof of compliance with CCR Title 3, Division 8, Chapter 1, Section 8305 the Renewable Energy Requirements.*
- c. If alternative energy sources are to be used, describe those sources and the amount of electricity that will be provided.*
- d. For indoor cannabis cultivation licensees, ensure that electrical power used for commercial cannabis activity shall be provided by any combination of the following:*
 - (1) On-grid power with 42 percent renewable source. (2) Onsite zero net energy renewable source providing 42 percent of power. (3) Purchase of carbon offsets for any portion of power above 58 percent not from renewable sources. (4) Demonstration that the equipment to be used would be 42 percent more energy efficient than standard equipment, using 2014 as the baseline year for such standard equipment.*
- e. Describe what parameters will be monitored and the methodology of the monitoring program.*

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

"The indoor or mixed-light cultivation of cannabis shall not rely on a personal gasoline, diesel, propane, or similar fuels, powered generator as a primary source of power and shall only allow properly permitted (when applicable) generators for temporary use in the event of a power outage or emergency that is beyond the permittee's control."

6.2. Energy Calculations

The CDFW CalCannabis Program states the following:

"Outdoor cultivation utilizes natural daylight for photosynthesis, although cultivators may have use artificial lighting to maintain immature plants as a source for propagation. Outdoor cultivation operations typically start the plants indoors or in greenhouses before moving them outside during the summer months. Under the Proposed Program, it is anticipated that this cultivation type would have the least lighting needs, compared to indoor, mixed-light, and nursery operations."

"Note that lighting may be used for propagation under any of the Proposed Program's license types, although for outdoor licenses, this is permissible only to maintain immature plants as a source for propagation."

"Outdoor cultivation is conducted without the use of artificial lighting for plant growth, with the exception that artificial lighting is permissible to maintain immature plants as a source or plant propagation (CDFA 2017)."

The Property has electricity provided by both PG&E. The proposed project is primarily will be full sun/outdoor cultivation operations. For each cultivation operation, a small solar-powered electrical system may be installed to power low voltage items such as security cameras, and water pumps for drawing groundwater and mixing liquid fertilizers into the irrigation systems.

If indoor cultivation operations are initiated, this Energy Use subplan should be updated.

6.3. Energy Conservation Measures

A combination of the following energy conservation measures may be employed at this operation:

- use of solar power where electricity is needed, and use of high-efficiency storage batteries, such as lithium-ion
- use of passive solar energy techniques such as proper site selection, overhanging eaves, tree canopy cover, walls with high thermal inertia, etc.
- use of LED lights or other high-efficiency lighting
- use of ambient light whenever possible
- use of highly insulative materials to reduce energy needed for structure heating and cooling
- use of electric vehicles or bicycles instead of combustion-powered vehicles, whenever possible
- use of hand tools instead of power tools

All new buildings, alterations, additions, and commercial buildings in California must comply with the Building Energy Efficiency Standards according to Title 24, Part 6 of California Code of Regulation. Energy compliance documentation is typically required at the building permit phase. The following online resource can be used to calculate energy usage and conservation measures: <http://www.energy.ca.gov/title24/orc/>. Also refer to the 2016 Building Energy Efficiency Standards for Residential and Non-Residential Buildings.

6.4. Alternative Energy Sources

A conceptual solar power system for the cultivation area would consist of an array of solar panels, an inverter, control panel, and batteries. The estimated power output will be about 2 kilowatt hours per day. Internet sources provide this equation for calculating the energy production of a solar array: *"Using 4 hours of full sun, gives you this equation: 250 watts x 4 hours. That's 1 kWh (1,000 watt hours) in a day per 250-watt panel. If you multiply 1kWh per panel by 30 days in a month, you'll find that each 250 watt rated panel will produce about 30 kWh in an average month."* (<https://solarpowerrocks.com/solar-basics/how-much-electricity-does-a-solar-panel-produce/>).

6.5. Monitoring Program

The Ordinance requires energy monitoring, but primarily for indoor or mixed light cultivation. Energy consumption should be monitored and metered data stored. Energy consumption will be metered using Electric Meters (KWh Meters) for alternating current and DC meters that measure power in ampere-hours. The meters are included in the controllers / inverters that are part of the solar power system.

7.0 FERTILIZER USAGE

7.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Fertilizer Usage:

- (a) Intent: To ensure consistency fertilizer storage and use with the other sections of the property management plan.*
- (b) This section shall describe how cultivation and nursery permittees will comply with the following fertilizer application and storage protocols:*
 - a. Comply with all fertilizer label directions;*
 - b. Store fertilizers in a secure building or shed;*
 - c. Contain any fertilizer spills and immediately clean up any spills;*
 - d. Apply the minimum amount of product necessary;*
 - e. Prevent offsite drift;*
 - f. Do not spray directly to surface water or allow fertilizer product to drift to surface water. Spray only when wind is blowing away from surface water bodies;*
 - g. Do not apply fertilizer when they may reach surface water or groundwater; and*
 - h. The use of fertilizer shall not be located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.*
- (c) This section shall include a map of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record of land or within 100 feet of the lot of record and a 100-foot setback from any identified spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.*
- (d) Describe what parameters will be monitored and the methodology of the monitoring program.*

7.2. Inventory of Fertilizers

To establish the outdoor gardens, native soil will be enriched with imported organic matter such as worm castings or compost. Because the gardens have not yet been designed and installed, it was assumed that for each acre, 19 cubic yards of worm castings would be tilled into the native soil

After the first year, and after the native soils have been blended with imported organics, dry fertilizers will be used to optimize plant macronutrients and micronutrients. When the gardens are operational, this Plan will be updated with an inventory of dry fertilizers and their annual application rates.

For this cultivation operation, fertilizer inputs consist of a mixture granular products, liquid products, and products generated on site, such as compost tea. During a typical growing season, the following amounts of fertilizers/soil amendments are used:

- to be determined

7.3. Storage and Handling Protocols

Bulk fertilizers and soil amendments are mixed with soils, and then either tilled in to the ground for in-ground cultivation, or placed in to grow bags or raised beds or other containers. Dry/bulk fertilizers and soil amendments can also be applied directly to the planting stations by shovel. Liquid or granular fertilizers can be mixed with water in mixing tanks; plastic tubing and driplines can then be used to gravity-feed the water / fertilizer mixture to the planting stations. Liquid

fertilizers (or compost teas) can also be applied by using a spray tank mounted to a backpack, all-terrain vehicle, golf cart, or a garden cart.

Fertilizers and other chemicals will be stored in a stormproof shed, Conex container, and/or outbuilding so that stormwater is not contaminated. Fertilizers will be properly labeled and open containers sealed when stored. Personal protective equipment will be used by staff when handling fertilizers and other chemicals, such as safety glasses, gloves, dust mask or respirator, boots, and pants and long-sleeved shirt. Fertilizers will be handled and applied according to their instructions. See Material Safety Data Sheets in the Appendix for specific information. The following fertilizer application and storage protocols will be implemented:

- Comply with all label directions;
- Store chemicals in a secure building or shed to prevent access by wildlife;
- Contain any chemical leaks and immediately clean up any spills;
- Apply the minimum amount of product necessary;
- Prevent offsite drift;
- Do not apply chemicals when pollinators are present;
- Do not spray directly to surface water or allow chemical product to drift to surface water.

7.4. Monitoring Program

The monitoring program for fertilizers is incorporated in to the Stormwater Monitoring Program. In general, the monitoring program consists of regular inspections of chemical storage areas, the immediate cleanup of spilled products, recordkeeping of quantities and types of fertilizers used, employee training in proper use and handling, and use of personal protective equipment.

7.5. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

8.0 FISH AND WILDLIFE PROTECTION

8.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Fish and Wildlife Protection:

- (a) *Intent: To minimize adverse impacts on fish and wildlife.*
- (b) *In this section permittees shall include:*
 - a. *A description of the fish and wildlife that are located on or utilize on a seasonal basis the lot of record where the permitted activity is located.*
 - b. *A description of the habitats found on the lot of record.*
 - c. *A description of the watershed in which the permitted activity is located.*
 - d. *Describe how the permittee will minimize adverse impacts on the fish and wildlife.*
 - e. *A map showing the location of any conservation easements or wildlife corridors proposed.*

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

"Tree Removal. The removal of any commercial tree species as defined by the California Code of Regulations section 895.1, Commercial Species for the Coast Forest District and Northern Forest District, and the removal of any true oak species (Quercus species) or Tan Oak (Notholithocarpus spices) for the purpose of developing a cannabis cultivation site should be avoided and minimized. This shall not include the pruning of any such tree species for the health of the tree or the removal of such trees if necessary for safety or disease concerns."

At the State level, in areas inside timberland, any tree removal is subject to the conditions and requirements set forth in the Z'berg-Nejedly Forest Practice Act and the California Forest Practice Rules. If development of a project will result in the removal of commercial tree species, one of the following permits from CAL FIRE is needed: Less than 3 Acre Conversion Exemption; Christmas Tree; Dead, Dying or Diseased, Fuelwood, or Split Products Exemption; a Public Agency, Public and Private Utility Right of Way Exemption; a Notice of Exemption from Timberland Conversion Permit for Subdivision; or an Application for Timberland Conversion Permit.

The following Biological Site Assessment was performed for the proposed project and is bound separately:

- Natural Investigations Co. 2019. Biological Site Assessment for the Cannabis Cultivation Operations at 14507 Western Mine Road, Middletown. 44 pp.

8.2. Description of Fish & Wildlife, Habitats, and Watersheds

8.2.1. Fish and Wildlife

A wildlife survey was conducted on December 5, 2019 (Natural Investigations Co., Inc. 2019). The following animals were detected within the parcel during the field survey: Gray fox (*Urocyon cinereoargenteus*; sign); black-tailed jackrabbit (*Lepus californicus*; sign); spotted towhee (*Pipilo maculatus*), Steller's jay (*Cyanocitta stelleri*); acorn woodpecker (*Melanerpes formicivorus*); northern flicker (*Colaptes auratus*), and domestic dog (*Canis familiaris*). The landowner also mentioned that he had seen newts on the property.

The California Natural Diversity Data Base was queried, and any reported occurrences of special-status species were plotted in relation to the cultivation areas using GIS software (see

exhibits). The CNDDDB reported no special-status habitats or special-status species within the boundaries of the Parcel or the operational area. Within a 10-mile buffer around the Parcel, the CNDDDB reported various special-status species occurrences, summarized in the following table. A federal species list was also generated from the USFWS website.

Amphibians

The nearest CNDDDB wildlife record is for California giant salamander (*Dicamptodon ensatus*); it is located approximately 0.4 miles to the southwest. Although some individuals retain gills as adults, there are also adult forms that utilize moist upland coniferous forests. Nearby CNDDDB records occur for red-bellied newt (*Taricha rivularis*). Adults are terrestrial and inhabit moist coniferous forests. Movement is most often associated with rains and migration to aquatic breeding habitat. The landowner mentioned that newts occur on the property.

Birds

Purple martin (*Progne subis*) occupies woodpecker cavities and sometimes human-made structures. The nearest occurrence is at Detert Reservoir to the east. Suitable habitat exists within the mixed oak / conifer woodland within the Study Area.

Mammals

Several Townsend's big-eared bat (*Corynorhinus townsendii*) records occur in the vicinity; the closest is on Western Mine Road at Highway 20. The species can be found roosting in outcrops with crevices and small outcrops occur within the Study Area; one outcrop is approximately 50 feet southwest of the Project Area.

A nearby 2013 CNDDDB record for Pacific fisher (*Pekania pennanti*) occurs approximately 3.3 miles northwest of the Study Area. This species was recently listed as threatened under the California Endangered Species Act. Although at the southern range of the species, suitable habitat (dense Douglas fir forest with downed wood) may occur within the Study Area. Individuals of this species, especially males, have large home ranges.

Special-status Species Reported by CNDDB in the Vicinity of the Study Area

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
<i>Agelaius tricolor</i>	tricolored blackbird	CT/CSSC	HIGHLY COLONIAL SPECIES, MOST NUMEROUS IN CENTRAL VALLEY & VICINITY. LARGELY ENDEMIC TO CALIFORNIA.	REQUIRES OPEN WATER, PROTECTED NESTING SUBSTRATE, & FORAGING AREA WITH INSECT PREY WITHIN A FEW KM OF THE COLONY.
<i>Amorpha californica</i> var. <i>napensis</i>	Napa false indigo	1B.2	BROADLEAFED UPLAND FOREST, CHAPARRAL, CISMONTANE WOODLAND.	OPENINGS IN FOREST OR WOODLAND OR IN CHAPARRAL. 120-2000 M
<i>Amsinckia lunaris</i>	bent-flowered fiddleneck	1B.2	CISMONTANE WOODLAND, VALLEY AND FOOTHILL GRASSLAND.	50-500M.
<i>Antirrhinum subcordatum</i>	dimorphic snapdragon	CSSC	CHAPARRAL, LOWER MONTANE CONIFEROUS FOREST.	GENERALLY ON SERPENTINE OR SHALE IN FOOTHILL WOODLAND OR CHAPARRAL ON S- AND W-FACING SLOPES. 185-800 M.
<i>Antrozous pallidus</i>	pallid bat	CSSC	DESERTS, GRASSLANDS, SHRUBLANDS, WOODLANDS & FORESTS. MOST COMMON IN OPEN, DRY HABITATS WITH ROCKY AREAS FOR ROOSTING.	ROOSTS MUST PROTECT BATS FROM HIGH TEMPERATURES. VERY SENSITIVE TO DISTURBANCE OF ROOSTING SITES.
<i>Arctostaphylos manzanita</i> ssp. <i>elegans</i>	Konocti manzanita	1B.3	CHAPARRAL, CISMONTANE WOODLAND, LOWER MONTANE CONIFEROUS FOREST.	VOLCANIC SOILS. 395-1615 M.
<i>Arctostaphylos stanfordiana</i> ssp. <i>decumbens</i>	Rincon Ridge manzanita	1B.1	CHAPARRAL.	HIGHLY RESTRICTED ENDEMIC TO RED RHYOLITES IN SONOMA COUNTY. 75-310M.
<i>Astragalus rattanii</i> var. <i>jepsonianus</i>	Jepson's milk-vetch	1B.2	CISMONTANE WOODLAND, VALLEY AND FOOTHILL GRASSLAND, CHAPARRAL.	COMMONLY ON SERPENTINE IN GRASSLAND OR OPENINGS IN CHAPARRAL. 180-1000 M.
<i>Bombus caliginosus</i>	obscure bumble bee	CSSC	.	.
<i>Bombus occidentalis</i>	western bumble bee	CSSC	ONCE COMMON & WIDESPREAD, SPECIES HAS DECLINED PRECIPITOUSLY FROM CENTRAL CA TO SOUTHERN B.C., PERHAPS FROM DISEASE.	
<i>Brodiaea leptandra</i>	narrow-anthered brodiaea	1B.2	BROADLEAFED UPLAND FOREST, CHAPARRAL, CISMONTANE WOODLAND, LOWER MONTANE CONIFEROUS FOREST, VALLEY AND FOOTHILL GRASSLAND	VOLCANIC SUBSTRATES. 110-915 M.
<i>Calystegia collina</i> ssp. <i>oxyphylla</i>	Mt. Saint Helena morning-glory	CSSC	CHAPARRAL, LOWER MONTANE CONIFEROUS FOREST, VALLEY AND FOOTHILL GRASSLAND.	ON SERPENTINE BARRENS, SLOPES, AND HILLSIDES. 280-1010 M.
<i>Carex praticola</i>	northern meadow sedge	2B.2	MEADOWS AND SEEPS.	MOIST TO WET MEADOWS. 0-3200 M.
<i>Castilleja rubicundula</i> var. <i>rubicundula</i>	pink creamsacs	1B.2	CHAPARRAL, MEADOWS AND SEEPS, VALLEY AND FOOTHILL GRASSLAND.	OPENINGS IN CHAPARRAL OR GRASSLANDS. ON SERPENTINE. 20-900 M.
<i>Ceanothus confusus</i>	Rincon Ridge ceanothus	1B.1	CLOSED-CONE CONIFEROUS FOREST, CHAPARRAL, CISMONTANE WOODLAND.	KNOWN FROM VOLCANIC OR SERPENTINE SOILS, DRY SHRUBBY SLOPES. 75-1065 M.
<i>Ceanothus divergens</i>	Calistoga ceanothus	1B.2	CHAPARRAL.	ROCKY, SERPENTINE OR VOLCANIC SITES. 170-950 M.

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
<i>Ceanothus purpureus</i>	holly-leaved ceanothus	1B.2	CHAPARRAL.	ROCKY, VOLCANIC SLOPES. 120-640M.
<i>Ceanothus sonomensis</i>	Sonoma ceanothus	1B.2	CHAPARRAL.	SANDY, SERPENTINE OR VOLCANIC SOILS. 210-800 M.
<i>Centromadia parryi</i> ssp. <i>parryi</i>	pappose tarplant	1B.2	COASTAL PRAIRIE, MEADOWS AND SEEPS, COASTAL SALT MARSH, VALLEY AND FOOTHILL GRASSLAND.	VERNALLY MESIC, OFTEN ALKALINE SITES. 2-420M.
<i>Chlorogalum pomeridianum</i> var. <i>minus</i>	dwarf soaproot	1B.2	CHAPARRAL, VALLEY AND FOOTHILL GRASSLAND.	SERPENTINE. 240-970 M.
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	CSSC	THROUGHOUT CALIFORNIA IN A WIDE VARIETY OF HABITATS. MOST COMMON IN MESIC SITES.	ROOSTS IN THE OPEN, HANGING FROM WALLS & CEILINGS. ROOSTING SITES LIMITING. EXTREMELY SENSITIVE TO HUMAN DISTURBANCE.
<i>Cryptantha dissita</i>	serpentine cryptantha	1B.2	CHAPARRAL.	SERPENTINE OUTCROPS. 330-730M.
<i>Dicamptodon ensatus</i>	California giant salamander	CSSC	.	.
<i>Emys marmorata</i>	western pond turtle	CSSC	A THOROUGHLY AQUATIC TURTLE OF PONDS, MARSHES, RIVERS, STREAMS & IRRIGATION DITCHES, USUALLY WITH AQUATIC VEGETATION, BE	NEED BASKING SITES AND SUITABLE (SANDY BANKS OR GRASSY OPEN FIELDS) UPLAND HABITAT UP TO 0.5 KM FROM WATER FOR EGG-LAYIN
<i>Erigeron greenei</i>	Greene's narrow-leaved daisy	1B.2	CHAPARRAL.	SERPENTINE AND VOLCANIC SUBSTRATES, GENERALLY IN SHRUBBY VEGETATION. 80-1005 M.
<i>Eriogonum nervulosum</i>	Snow Mountain buckwheat	1B.2	CHAPARRAL.	DRY SERPENTINE OUTCROPS, BALDS, AND BARRENS. 300-2100 M.
<i>Falco peregrinus anatum</i>	American peregrine falcon	CFP	NEAR WETLANDS, LAKES, RIVERS, OR OTHER WATER; ON CLIFFS, BANKS, DUNES, MOUNDS; ALSO, HUMAN-MADE STRUCTURES.	NEST CONSISTS OF A SCRAPE OR A DEPRESSION OR LEDGE IN AN OPEN SITE.
<i>Fritillaria pluriflora</i>	adobe-lily	1B.2	CHAPARRAL, CISMONTANE WOODLAND, FOOTHILL GRASSLAND.	USUALLY ON CLAY SOILS; SOMETIMES SERPENTINE. 60-705 M.
<i>Gratiola heterosepala</i>	Boggs Lake hedge-hyssop	CE/1B.2	MARSHES AND SWAMPS (FRESHWATER), VERNAL POOLS.	CLAY SOILS; USUALLY IN VERNAL POOLS, SOMETIMES ON LAKE MARGINS. 10-2375 M.
<i>Haliaeetus leucocephalus</i>	bald eagle	CE/CFP/B GEPA	OCEAN SHORE, LAKE MARGINS, & RIVERS FOR BOTH NESTING & WINTERING. MOST NESTS WITHIN 1 MI OF WATER.	NESTS IN LARGE, OLD-GROWTH, OR DOMINANT LIVE TREE W/OPEN BRANCHES, ESPECIALLY PONDEROSA PINE. ROOSTS COMMUNALLY IN WINTE
<i>Harmonia hallii</i>	Hall's harmonia	1B.2	CHAPARRAL.	SERPENTINE HILLS AND RIDGES. OPEN, ROCKY AREAS WITHIN CHAPARRAL. 500-900 M.
<i>Hemizonia congesta</i> ssp. <i>congesta</i>	congested-headed hayfield tarplant	1B.2	VALLEY AND FOOTHILL GRASSLAND.	GRASSY VALLEYS AND HILLS, OFTEN IN FALLOW FIELDS; SOMETIMES ALONG ROADSIDES. 20-560 M.
<i>Hesperolinon bicarpellatum</i>	two-carpellate western flax	1B.2	SERPENTINE CHAPARRAL.	SERPENTINE BARRENS AT EDGE OF CHAPARRAL. 60-1005 M.

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
<i>Hesperolinon didymocarpum</i>	Lake County western flax	CE/1B.2	CHAPARRAL, CISMONTANE WOODLAND, VALLEY AND FOOTHILL GRASSLAND.	SERPENTINE SOIL IN OPEN GRASSLAND AND NEAR CHAPARRAL. 330-365M.
<i>Hesperolinon sharsmithiae</i>	Sharsmith's western flax	1B.2	CHAPARRAL.	SERPENTINE SUBSTRATES. 270-300 M.
<i>Hydrochara rickseckeri</i>	Ricksecker's water scavenger beetle	CSSC	AQUATIC.	.
<i>Hysteroecarpus traskii</i> pomo	Russian River tule perch	CSSC	LOW ELEVATION STREAMS OF THE RUSSIAN RIVER SYSTEM.	REQUIRES CLEAR, FLOWING WATER WITH ABUNDANT COVER. THEY ALSO REQUIRE DEEP (> 1 M) POOL HABITAT.
<i>Juncus luciensis</i>	Santa Lucia dwarf rush	1B.2	VERNAL POOLS, MEADOWS, LOWER MONTANE CONIFEROUS FOREST, CHAPARRAL, GREAT BASIN SCRUB.	VERNAL POOLS, EPHEMERAL DRAINAGES, WET MEADOW HABITATS AND STREAMSIDES. 300-2040M.
<i>Lasiurus blossevillii</i>	western red bat	CSSC	ROOSTS PRIMARILY IN TREES, 2-40 FT ABOVE GROUND, FROM SEA LEVEL UP THROUGH MIXED CONIFER FORESTS.	PREFERS HABITAT EDGES & MOSAICS WITH TREES THAT ARE PROTECTED FROM ABOVE & OPEN BELOW WITH OPEN AREAS FOR FORAGING.
<i>Lasthenia burkei</i>	Burke's goldfields	FE/CE/1B .1	VERNAL POOLS, MEADOWS AND SEEPS.	MOST OFTEN IN VERNAL POOLS AND SWALES. 15-600 M.
<i>Layia septentrionalis</i>	Colusa layia	1B.2	CHAPARRAL, CISMONTANE WOODLAND, VALLEY AND FOOTHILL GRASSLAND.	SCATTERED COLONIES IN FIELDS AND GRASSY SLOPES IN SANDY OR SERPENTINE SOIL. 145-1095M.
<i>Leptosiphon jepsonii</i>	Jepson's leptosiphon	1B.2	CHAPARRAL, CISMONTANE WOODLAND.	OPEN TO PARTIALLY SHADED GRASSY SLOPES. ON VOLCANICS OR THE PERIPHERY OF SERPENTINE SUBSTRATES. 100-500M.
<i>Limnanthes floccosa</i> ssp. <i>floccosa</i>	woolly meadowfoam	CSSC	CHAPARRAL, CISMONTANE WOODLAND, VALLEY AND FOOTHILL GRASSLAND, VERNAL POOLS.	VERNALLY WET AREAS, DITCHES, AND PONDS. 60-1335 M.
<i>Limnanthes vincularis</i>	Sebastopol meadowfoam	FE/CE/1B .1	MESIC MEADOWS, VERNAL POOLS, VALLEY AND FOOTHILL GRASSLAND.	SWALES, WET MEADOWS AND MARSHY AREAS IN VALLEY OAK SAVANNA; ON POORLY DRAINED SOILS OF CLAYS AND SANDY LOAM. 15-305 M.
<i>Lupinus sericatus</i>	Cobb Mountain lupine	1B.2	CHAPARRAL, CISMONTANE WOODLAND, LOWER MONTANE CONIFEROUS FOREST, BROADLEAFED UPLAND FOREST.	IN STANDS OF KNOBCONE PINE-OAK WOODLAND, ON OPEN WOODED SLOPES IN GRAVELLY SOILS; SOMETIMES ON SERPENTINE. 275-1525 M.
<i>Microseris paludosa</i>	marsh microseris	1B.2	CLOSED-CONE CONIFEROUS FOREST, CISMONTANE WOODLAND, COASTAL SCRUB, VALLEY AND FOOTHILL GRASSLAND.	5-300 M.
<i>Mylopharodon conocephalus</i>	hardhead	CSSC	LOW TO MID-ELEVATION STREAMS IN THE SACRAMENTO-SAN JOAQUIN DRAINAGE. ALSO PRESENT IN THE RUSSIAN RIVER.	CLEAR, DEEP POOLS WITH SAND-GRAVEL-BOULDER BOTTOMS & SLOW WATER VELOCITY. NOT FOUND WHERE EXOTIC CENTRARCHIDS PREDOMINANT
<i>Myotis thysanodes</i>	fringed myotis	CSSC	IN A WIDE VARIETY OF HABITATS, OPTIMAL HABITATS ARE PINYON-JUNIPER, VALLEY FOOTHILL	USES CAVES, MINES, BUILDINGS OR CREVICES FOR MATERNITY COLONIES AND ROOSTS.

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
			HARDWOOD & HARDWOOD-CONIFER.	
Navarretia leucocephala ssp. bakeri	Baker's navarretia	1B.1	CISMONTANE WOODLAND, MEADOWS AND SEEPS, VERNAL POOLS, VALLEY AND FOOTHILL GRASSLAND, LOWER MONTANE CONIFEROUS FOREST.	VERNAL POOLS AND SWALES; ADOBE OR ALKALINE SOILS. 5-1740 M.
Navarretia leucocephala ssp. plieantha	many-flowered navarretia	FE/CT/1B.2	VERNAL POOLS.	VOLCANIC ASH FLOW VERNAL POOLS. 30-950 M.
Navarretia myersii ssp. diminuta	small pincushion navarretia	1B.1	VERNAL POOLS.	KNOWN FROM ONLY ONE SITE IN LAKE COUNTY IN VERNAL POOL HABITAT ON CLAY-LOAM SOIL; ALSO IN ROADSIDE DEPRESSIONS. 355 M.
Navarretia paradoxinota	Porter's navarretia	1B.3	.	.
Navarretia rosulata	Marin County navarretia	1B.2	CLOSED-CONE CONIFEROUS FOREST, CHAPARRAL.	DRY, OPEN ROCKY PLACES; CAN OCCUR ON SERPENTINE. 200-635M.
Oncorhynchus mykiss irideus pop. 8	steelhead - central California coast DPS	FT	FROM RUSSIAN RIVER, SOUTH TO SOQUEL CR & TO, BUT NOT INCLUDING, PAJARO RIVER. ALSO SAN FRANCISCO & SAN PABLO BAY BASINS.	.
Panicum acuminatum var. thermale	Geysers panicum	CE/1B.2	CLOSED-CONE CONIFEROUS FOREST, RIPARIAN FOREST, VALLEY AND FOOTHILL GRASSLAND.	USUALLY AROUND MOIST, WARM SOIL IN THE VICINITY OF HOT SPRINGS. 305-2470 M.
Pekania pennanti	fisher - West Coast DPS	CT/CSSC	INTERMEDIATE TO LARGE-TREE STAGES OF CONIFEROUS FORESTS & DECIDUOUS-RIPARIAN AREAS WITH HIGH PERCENT CANOPY CLOSURE.	USES CAVITIES, SNAGS, LOGS & ROCKY AREAS FOR COVER & DENNING. NEEDS LARGE AREAS OF MATURE, DENSE FOREST.
Penstemon newberryi var. sonomensis	Sonoma beardtongue	1B.3	CHAPARRAL.	CREVICES IN ROCK OUTCROPS AND TALUS SLOPES. 700-1370 M.
Plagiobothrys strictus	Calistoga popcornflower	FE/ST/1B.1	MEADOWS AND SEEPS, VALLEY AND FOOTHILL GRASSLAND, VERNAL POOLS.	ALKALINE SITES NEAR THERMAL SPRINGS AND ON MARGINS OF VERNAL POOLS IN HEAVY, DARK, ADOBE-LIKE CLAY. 90-160 M.
Poa napensis	Napa blue grass	FE/SE/1B.1	MEADOWS AND SEEPS, VALLEY AND FOOTHILL GRASSLAND.	MOIST ALKALINE MEADOWS FED BY RUNOFF FROM NEARBY HOT SPRINGS. 100-200 M.
Progne subis	purple martin	CSSC	INHABITS WOODLANDS, LOW ELEVATION CONIFEROUS FOREST OF DOUGLAS-FIR, PONDEROSA PINE, & MONTEREY PINE.	NESTS IN OLD WOODPECKER CAVITIES MOSTLY, ALSO IN HUMAN-MADE STRUCTURES. NEST OFTEN LOCATED IN TALL, ISOLATED TREE/SNAG.
Puccinellia simplex	California alkali grass	1B.2	.	.
Rana boylei	foothill yellow-legged frog	CST	PARTLY-SHADED, SHALLOW STREAMS & RIFFLES WITH A ROCKY SUBSTRATE IN A VARIETY OF HABITATS.	NEED AT LEAST SOME COBBLE-SIZED SUBSTRATE FOR EGG-LAYING. NEED AT LEAST 15 WEEKS TO ATTAIN METAMORPHOSIS.

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
<i>Sedella leiocarpa</i>	Lake County stonecrop	FE/SE/1B.1	VALLEY AND FOOTHILL GRASSLAND, VERNAL POOLS, CISMONTANE WOODLAND.	LEVEL AREAS THAT ARE SEASONALLY WET AND DRY OUT IN LATE SPRING; SUBSTRATE USUALLY OF VOLCANIC ORIGIN. 365-790 M.
<i>Sidalcea oregana</i> ssp. <i>hydrophila</i>	marsh checkerbloom	1B.2	MEADOWS AND SEEPS, RIPARIAN FOREST.	WET SOIL OF STREAMBANKS, MEADOWS. 1100-2300 M.
<i>Sidalcea oregana</i> ssp. <i>valida</i>	Kenwood Marsh checkerbloom	FE/CE/1B.1	MARSHES AND SWAMPS.	EDGES OF FRESHWATER MARSHES. 115-150 M.
<i>Spergularia macrotheca</i> var. <i>longistyla</i>	long-styled sand-spurrey	1B.2	.	.
<i>Streptanthus brachiatus</i> ssp. <i>brachiatus</i>	Socrates Mine jewelflower	1B.2	CHAPARRAL, CLOSED-CONE CONIFEROUS FOREST.	SERPENTINE AREAS AND SERPENTINE CHAPARRAL. 545-1000 M.
<i>Streptanthus brachiatus</i> ssp. <i>hoffmanii</i>	Freed's jewelflower	1B.2	CHAPARRAL, CISMONTANE WOODLAND.	SERPENTINE ROCK OUTCROPS, PRIMARILY IN GEOTHERMAL DEVELOPMENT AREAS. 490-1220 M.
<i>Streptanthus hesperidis</i>	green jewelflower	1B.2	CHAPARRAL, CISMONTANE WOODLAND.	OPENINGS IN CHAPARRAL OR WOODLAND; SERPENTINE, ROCKY SITES. 130-760M.
<i>Streptanthus morrisonii</i> ssp. <i>elatus</i>	Three Peaks jewelflower	1B.2	CHAPARRAL.	SERPENTINE BARRENS, OUTCROPS, AND TALUS; 80-815 M.
<i>Streptanthus vernalis</i>	early jewelflower	1B.2	CHAPARRAL, CLOSED-CONE CONIFEROUS FOREST.	ON SERPENTINE. 610M.
<i>Stuckenia filiformis</i> ssp. <i>alpina</i>	slender-leaved pondweed	2B.2	MARSHES AND SWAMPS.	SHALLOW, CLEAR WATER OF LAKES AND DRAINAGE CHANNELS. 300-2150 M.
<i>Stygobromus cherylae</i>	Barr's amphipod	CSSC	KNOWN ONLY FROM A SPRING BOX IN SONOMA COUNTY.	.
<i>Syncaris pacifica</i>	California freshwater shrimp	FE/CE/1B.1	ENDEMIC TO MARIN, NAPA, & SONOMA COUNTIES. FOUND IN LOW ELEVATION, LOW GRADIENT STREAMS WHERE RIPARIAN COVER IS MODERA	SHALLOW POOLS AWAY FROM MAIN STREAMFLOW. WINTER: UNDERCUT BANKS W/EXPOSED ROOTS. SUMMER: LEAFY BRANCHES TOUCHING WATER.
<i>Taricha rivularis</i>	red-bellied newt	CSSC	.	.
<i>Taxidea taxus</i>	American badger	CSSC	MOST ABUNDANT IN DRIER OPEN STAGES OF MOST SHRUB, FOREST, AND HERBACEOUS HABITATS, WITH FRIABLE SOILS.	NEEDS SUFFICIENT FOOD, FRIABLE SOILS & OPEN, UNCULTIVATED GROUND. PREYS ON BURROWING RODENTS. DIGS BURROWS.
<i>Trachykele hartmani</i>	serpentine cypress wood-boring beetle	CSSC	LARVAE DEVELOP IN SARGENT CYPRESS. RESTRICTED TO NAPA, COLUSA, AND LAKE COUNTIES.	
<i>Trichostema ruygtii</i>	Napa bluecurls	1B.2	CISMONTANE WOODLAND, CHAPARRAL, VALLEY AND FOOTHILL GRASSLAND, VERNAL POOLS, LOWER MONTANE CONIFEROUS FOREST.	OFTEN IN OPEN, SUNNY AREAS. ALSO HAS BEEN FOUND IN VERNAL POOLS. 30-590M.
<i>Trifolium hydrophilum</i>	saline clover	1B.2	MARSHES AND SWAMPS, VALLEY AND FOOTHILL GRASSLAND, VERNAL POOLS.	MESIC, ALKALINE SITES. 0-300 M.

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**
Vandykea tuberculata	serpentine cypress long-horned beetle	CSSC	BREEDS IN SHADED-OUT LOWER BRANCHES OF SARGENT CYPRESS AND PERHAPS MCNAB CYPRESS IN SERPENTINE SOIL/CYPRESS HABITATS.	.

*Definitions of Status Codes: FE = Federally listed as endangered; FT = Federally listed as threatened; FPE = Federally proposed for listing as endangered; FPT = Federally proposed for listing as threatened; FC = Candidate for Federal listing; MB = Migratory Bird Act; CE = California State listed as endangered; CT = California State listed as threatened; CCT= California State Candidate for listing as threatened; CSSC = California species of special concern, including Natural Heritage Global Ranks 1-3 and State Ranks 1-3; CR = California rare species; CFP = California fully protected species; CNPS (California Native Plant Society) List 1A = Plants presumed extinct in California by CNPS; CNPS List 1B = CNPS designated rare or endangered plants in California and elsewhere; and CNPS List 2 = CNPS designated rare or endangered plants in California, but more common elsewhere.

**Copied verbatim from CNDDDB, unless otherwise noted.

8.2.2. Habitats

Vegetation Communities

The proposed cultivation site is located within the Inner North Coast Range geographic subregion, which is contained within the Northwestern California geographic subdivision of the larger California Floristic Province (Baldwin et al. 2012). This region has a Mediterranean-type climate, characterized by distinct seasons of hot, dry summers and wet, moderately-cold winters. The Parcel and vicinity are in Sunset Climate Zone 7, California's Gray Pine Belt, with hot summers and mild but pronounced winters without severe winter cold or high humidity (Brenzel, 2012).

The Study Area contains the following terrestrial vegetation communities:

Chaparral: The community occurs in southern and western-facing slopes. It is dominated by shrubs such as manzanita (*Arctostaphylos* spp.), chamise (*Adenostoma fasciculatum*), deerbrush and buckbrush (*Ceanothus* spp.), coyote brush (*Baccharis pilularis*), and toyon (*Heteromeles arbutifolia*). Poison-oak (*Toxicodendron diversilobum*) and yerba santa (*Eriodictyon californicum*) are also common. Within the Study Area, leather oak (*Quercus durata*) were also observed. Serpentine soils may be present.

Mixed Oak / Conifer Woodland: Within the Study Area, this community contains a high diversity of tree species including: Douglas fir (*Pseudotsuga menziesii*), interior live oak (*Quercus wislizeni*), gray pine/foothill pine (*Pinus sabiniana*), madrone (*Arbutus menziesii*), blue oak (*Quercus douglasii*), and ponderosa pine (*Pinus ponderosa*). Although the upper canopy is overlapping in most places and the understory is sparse, less dense patches can have an understory of chaparral plants.

Developed/Disturbed: These areas consist of disturbed or converted natural habitat that is now either in ruderal state, graded, or urbanized containing gravel roads and structures. Vegetation within this habitat type consists primarily of nonnative weedy or invasive species or ornamental plants lacking a consistent community structure. The disturbed and altered condition of these lands greatly reduces their habitat value and ability to sustain rare plants or diverse wildlife assemblages.

Non-native Annual Grassland: The California Annual Grassland Series (Sawyer and Keeler-Wolf, 1995) consists of open fields of non-native pasture grasses and weedy forbs. These annual grasslands have largely replaced native habitats of perennial bunchgrasses or foothill chaparral. Mowing or grazing disturbances, rather than periodic wildfires, typically keep this plant community from undergoing successional changes to woodland or back to perennial grassland. Plant species common in this community include European annual grasses (*Avena*, *Bromus*, *Hordeum*, and *Festuca*). Although dominated by invasives such as wild oats (*Avena barbarata*) and yellow starthistle (*Centaurea solstitialis*), native bunch grasses including needlegrass (*Stipa* sp.) were observed.

Several special-status plant species have the potential to occur based on nearby CNDDDB records the availability of suitable habitat (chaparral habitat with serpentine soils) within the Study Area. The nearest CNDDDB plant records are approximately 0.6 miles west along Kroll Creek and include Snow Mountain buckwheat (*Eriogonum nervulosum*) and Freed's jewelflower (*Streptanthus brachiatus* ssp. *hoffmanii*). These two species are associated with serpentine outcrops. Other serpentine plants known from nearby Robert Louis Steven State Park include: narrow-anthered brodiaea (*Brodiaea leptandra*), Jepson's milk-vetch (*Astragalus rattanii* var. *jepsonianus*), Calistoga ceanothus (*Ceanothus divergens*), and two-

carpellate western flax (*Hesperolinon bicarpellatum*). CNDDDB records for Konocti manzanita (*Arctostaphylos manzanita* ssp. *elegans*) and Jepson's milk-vetch (*Astragalus rattanii* var. *jepsonianus*) are also nearby. Although the Study Area is set within a botanically rich region and contains potential habitat for special-status plants adapted to serpentine soils, the entire Project Area has been graded and has been regularly maintained to reduce fire hazard. Furthermore, as engineered drainage systems on the site have been well designed and as the site is generally flat, no indirect impacts to special-status plants from erosion/habitat degradation are expected.

Wildlife Habitats

The wildlife habitat types found within the Property are: Mixed Chaparral, Douglas Fir, Blue Oak Foothill Pine, Annual Grassland, Riverine, Barren, and Urban, as classified by CDFW's Wildlife Habitat Relationship System (WHR). Of these, Mixed Chaparral and Douglas Fir habitats cover the largest spatial areas. These habitats are home to a variety of wildlife species. Mature forests are valuable to cavity nesting birds, such as woodpeckers. Acorns in these forests are an important food source for many birds, as well as mammals, such as deer.

The operational areas are / are not within any designated listed species' critical habitat. Although there are no designated previously mapped wildlife corridors within the Study Area, such as modeled essential connectivity areas in CNDDDB, open habitat patches, former jeep and logging trails, and St. Mary's Creek function as wildlife corridors. No anadromous fishery resources exist in or near the Study Area; however, trout may be present seasonally while St. Mary's Creek is flowing. It is tributary to a perennial creek. The Study Area contains two special-status aquatic habitats: a small isolated wetland and St. Mary's Creek. However, the Project Area is over 200 feet from these water resources. There is no evidence that project implementation would directly impact any special-status habitats. Therefore, no mitigation is required.

Although the Study Area provides potential habitat for special-status amphibians, mammals, and birds, no direct impacts to these species or their habitat are expected because no suitable upland or aquatic habitat will be directly impacted. If any new land clearing of previously undisturbed natural habitat is required in the future, a new biological site survey and a reassessment of potential impacts to plants and wildlife should be performed. No direct impacts to special-status species were identified from project implementation. Best Management Practices and adherence to guidelines for the proper use and storage of hazardous materials, such as petroleum products, herbicides, pesticides, and fertilizers, required by County and the Regional Water Quality Board permits will ensure that no indirect impacts to special-status plants or animals will occur. Therefore, no compensatory mitigation is required.

Implementation of the project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No preserves or wildlife corridors need to be established for impact mitigation.

8.2.3. Watershed

The topography of the Study Area is mountainous. The elevation ranges from approximately 1,640 feet to 2,400 feet above mean sea level. The only drainage on the property, St. Mary's Creek, is located on the eastern border and flows northeast to St. Helena Creek, then to Putah Creek. Current land uses of the Study Area are rural residential and undeveloped open space.

The surrounding land uses are mostly open space, with some rural residential estates. The following water features were detected within the Study Area during the field survey (see Exhibits):

- St. Mary's Creek (seasonal)
- a small potential isolated wetland

St. Mary's Creek is an intermittent channel (Class II watercourse). It is located approximately 0.47 miles to the east of the Project Area down a sloping hillside. It was not closely inspected due to inaccessibility and distance from the Project Area. The Creek is a tributary to St. Helena Creek, which drains to Putah Creek. There are multiple anadromous fish barriers downstream. Aerial imagery indicates that the canopy of tree species associated with St. Mary's Creek are the same as nearby upland habitats, so riparian habitat may be lacking. The Creek channel is likely 5-10 feet in width. A small potential isolated wetland contained emergent vegetation including rushes (*Juncus* sp.) and sedges (*Carex* sp.). No surface water was observed during the survey. It is approximately 230 feet uphill (east) of the Project Area.

While there is a potentially jurisdictional isolated wetland within the Study Area, it is uphill of, and over 200 feet from, the Project Area, and thus will not be affected. Similarly, a Class II watercourse, St. Mary's Creek is approximately 0.48 mile from the Project Area and will not be affected.

The Parcel is surrounded by open land / rural residences / agricultural land. Land uses in the vicinity are primarily cattle ranching, hunting, off-road vehicle recreation, vineyards, timberland, and parklands. The watershed of the surrounding area is relatively pristine, with south-facing slopes supporting chaparral, grasslands, and oak savannas, while the north-facing slopes are dense with mixed oak and conifer forests and woodlands. Valley floors are typically altered, and consists of irrigated agricultural lands and residential estates.

8.3. Fish & Wildlife Impact Avoidance and Minimization Measures

8.3.1. Periodic Biological Monitoring and Worker Training

If expansion of the proposed operation is planned in the future, it is recommended that a wildlife survey be conducted annually to ensure that no wildlife or special-status species are present in, or adjacent to, operational areas. The Parcel contains suitable nesting habitat for various bird species because of the presence of trees, poles, and brush. However, no nests or nesting activity was observed in the operational areas during the field survey. Bushy vegetation and trees must be inspected for the presence of active bird nests before tree felling or ground clearing.

Trees and other vegetation must be inspected for the presence of active bird nests before tree felling or ground clearing. If active nests are present in the project area during construction of the project, CDFW should be consulted to develop measures to avoid "take" of active nests prior to the initiation of any construction activities. Avoidance measures may include establishment of a buffer zone using construction fencing or the postponement of vegetation removal until after the nesting season, or until after a qualified biologist has determined the young have fledged and are independent of the nest site.

When workers are made aware of the importance of biological resources, they are better able to avoid resource impacts. When possible, periodically include environmental / biological information in safety meetings or other staff meetings. Make workers aware that impacts to biological resources cause work delays and may result in serious penalties. Establish an effective communication chain to report any potential resource questions or conflicts to the cultivation manager, who can contact the on-call consulting biologist.

Should any biological issues arise please contact:

- Project Biologist, Dr. Geo Graening at (916) 452-5442.

8.3.2. Protection of Waterbodies and Sensitive Habitats

Potential adverse impacts to water resources could occur during cultivation activities by modification or destruction of stream banks or riparian vegetation, the filling of wetlands, or by increased erosion and sedimentation in receiving water bodies due to soil disturbance. The cultivation operations are several hundred feet away from the nearest waterbody. There is no evidence that project implementation will impact any water resources. Water resource protection will be achieved by compliance with this Plan and compliance with the State Water Board's Cannabis Cultivation General Order.

Note that if the total area of ground disturbance required for construction activities of the cultivation operation is greater than 1 acre, the landowner or cultivator will need to enroll for coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 2009-0009-DWQ) and implement a storm water pollution prevention plan.

If operational activities occur near sensitive habitats, it is recommended that signage and/or fencing be erected that identifies the resource and limits entry to these areas. Security fencing that surrounds the cultivation compounds can function as wildlife exclusion devices. It is recommended that fencing be constructed to prevent passage of wildlife through the fencing.

If development of the project will result in the removal of commercial tree species, one of the following permits is needed from CalFire: Less than 3 Acre Conversion Exemption; Christmas Tree; Dead, Dying or Diseased, Fuelwood, or Split Products Exemption; a Public Agency, Public and Private Utility Right of Way Exemption; a Notice of Exemption from Timberland Conversion Permit for Subdivision; or an Application for Timberland Conversion Permit.

8.3.3. Operational Best Management Practices

The implementation of best management practices during construction and operations will ensure that biological resources are protected. The following are suggested practices and rules to be implemented:

- Restrict vehicular traffic to existing access roads whenever possible.
- Reduce vehicle speeds, especially on roadways.
- Minimize water usage
- Do not litter: litter attracts animals.
- Do not feed wildlife. Pets are not allowed within operational areas.
- No hunting or collecting of any animals or plants.
- Use tobacco products only in approved areas.

- Check under tires and equipment for resting animals.
- Use only designated toilet facilities.
- Implement an effective pollution prevention plan. By ensuring that potential pollutants, such as sediment and petroleum products, do not contaminate waterways or natural habitats, biological resources will be better protected.

8.4. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

9.0 OPERATIONS MANUAL

9.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section that is an Operations Manual:

(a) *Intent: To describe the operating procedures of the commercial cannabis cultivation site to ensure compliance with the use permit, protect the public health, safety and welfare, as well as the natural environment of Lake County.*
 (b) *This section shall include the following:*

1. *Authorization for the County, its agents, and employees, to seek verification of the information contained within the development permit or use permit applications, the Operations Manual, and the Operating Standards at any time before or after development or use permits are issued;*
2. *A description of the staff screening processes;*
3. *The hours and days of the week when the facility will be open;*
4. *[blank]*
5. *Description of measures taken to minimize or offset the carbon footprint from operational activities;*
6. *Description of chemicals stored, used and any effluent discharged as a result of operational activities.*

(c) *Grounds.*

- (1) *The permittee shall establish and implement written procedures to ensure that the grounds of the premises controlled by the permittee are kept in a condition that prevents the contamination of components and cannabis products. The methods for adequate maintenance of the grounds shall include at minimum:*
 - i. *The proper storage of equipment, removal of litter and waste, and cutting of weeds or grass so that the premises shall not constitute an attractant, breeding place, or harborage for pests.*
 - ii. *The proper maintenance of roads, yards, and parking lots so that these areas shall not constitute a source of contamination in areas where cannabis products are handled or transported.*
 - iii. *The provision of adequate draining areas in order to prevent contamination by seepage, foot-borne filth, or the breeding of pests due to unsanitary conditions.*
 - iv. *The provision and maintenance of waste treatment systems so as to prevent contamination in areas where cannabis products may be exposed to such a system's waste or waste by-products.*
- (2) *If the lot of record is bordered by grounds outside the applicant's control that are not maintained in the manner described in subsections (a) through (d) of this section, inspection, extermination, and other reasonable care shall be exercised within the lot of record in order to eliminate any pests, dirt, and/or filth that pose a source of cannabis product contamination.*

(d) *Any other information as may be requested by the Director and/or by the Planning Commission.*

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

"All lights used for cannabis related permits including indoor or mixed light cultivation of cannabis shall be fully contained within structures or otherwise shielded to fully contain any light or glare involved in the cultivation process. Artificial light shall be completely shielded between sunset and sunrise."

As this Operational Manual is refined and expanded, it may be bound separately. Note that the Standard Operating Procedures for Cannabis cultivation at this Property is a separate document.

9.2. Operational Information

9.2.1. Authorization of County Visits

One of the conditions of County licensing is that the cultivator give authorization for the County, its agents, and employees, to verify the information contained within the development permit or use permit applications, the Operations Manual, and the Operating Standards, at any time before or after development or use permits are issued.

9.2.2. Staff Screening Process

The staff screening process will consist, at a minimum of: criminal reports / background checks; in-person interviews; and the requirement that all applicants must provide a comprehensive resume and contact info of several references. Staff should wear identification badges.

Note that for Cannabis Use Permit renewal, the Ordinance requires a list of employees on the Property during the past year and a copy of the background checks certification for each.

9.2.3. Hours of Operation

This cultivation operation is closed to the public. Visitation is only allowed when specific permission is granted.

The cultivation operation hours of operation are:

- Monday, from 8 a.m. to 5 p.m.
- Tuesday, from 8 a.m. to 5 p.m.
- Wednesday, from 8 a.m. to 5 p.m.
- Thursday, from 8 a.m. to 5 p.m.
- Friday, from 8 a.m. to 5 p.m.
- Saturday, from 8 a.m. to 5 p.m.
- Sunday, closed

Holiday hours: t.b.d.

Cannabis Ordinance 3084 restricts deliveries and pickups to 9 am – 7 pm on Monday through Saturday and 12 pm – 5 pm on Sunday.

9.2.4. Other Information

Measures that will be taken to minimize or offset the carbon footprint from operational activities are:

- energy-saving measures (see Energy Usage subsection)
- water-saving measures (see Water Use subsection)
- solid waste reduction measures (see Waste Management subsection)
- air emissions reduction measures (see Air Quality Management subsection)
- proper site selection, use of existing contours instead of mass grading
- cultivation of fast-growing plants, which remove carbon dioxide from the air and fix it in plant biomass

The description of chemicals stored and used, and any effluent discharged as a result of operational activities is found in the Fertilizer subsection, the Pesticide subsection, the Hazardous Waste Management portion of the Waste Management subsection, and the Stormwater Management Subsection.

9.3. Groundskeeping

Good housekeeping measures will be implemented. The grounds will be inspected at least once per day and any litter picked up. Trash containers will be emptied when full. Roads will be maintained so that significant erosion does not occur. This may include wetting dusty roads, armoring with gravel, roadbase, or asphalt, patching holes, and maintaining drainage features such as water bars, culverts and side ditches. Weeds and grasses will be controlled by mulching or by cutting with a lawnmower or line trimmer. Drainage ditches and swales will regularly mowed and cleaned, including the removal of litter, debris, and sediment. Containers and ditches will be drained so that mosquitos do not breed. Areas inside cultivation compounds can be graveled or paved to prevent foot-borne filth. Live traps may be deployed to remove rodents from operational areas. Disposable coveralls (e.g. Tyvek) can be used to increase sanitation levels and reduce vectoring of mites and other pests. A clothing changing station / mudroom can be provided for employees so that street clothing is separated from cultivation clothing.

Property maintenance will follow Best Management Practices. The following CASQA Industrial and Commercial Handbook BMP Fact Sheets are applicable:

- BG-40 Landscape Maintenance
- SC-41 Building & Grounds Maintenance
- SC-40: Contaminated or Erodible Areas
- SC-43 Parking Area Maintenance
- SC-44 Drainage System Maintenance

Wastes will be managed as specified in the Waste Management subsection.

9.4. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

10.0 PEST MANAGEMENT

10.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Pest Management:

(a) Intent: To ensure consistency pest management with the other sections of the property management plan.

(b) This section shall describe how cultivation and nursery permittees will comply with the following pesticide application and storage protocols:

a. All pesticide applications must fully comply with the California Food and Agriculture Code, Division 6 Pest Control Operations and Division 7 Agriculture Chemical; Chapter 1 – 3.6 and California Code of Regulations, Division 6 Pest Control Operations.

b. These pesticide laws and regulations include but are not limited to:

i. Comply with all pesticide label directions;

ii. Store chemicals in a secure building or shed to prevent access by wildlife;

iii. Contain any chemical leaks and immediately clean up any spills;

iv. Prevent offsite drift;

v. Do not apply pesticides when pollinators are present;

vi. Do not allow drift to flowering plants attractive to pollinators;

vii. Do not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;

viii. Do not apply pesticides when they may reach surface water or groundwater; and

ix. Only use properly labeled pesticides.

x. The use of pesticides shall not be located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.

c. This section shall include a map of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record of land or within 100 feet of the lot of record and a 100 foot setback from any identified spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

“The use of any pesticide that has been banned for use in the state is prohibited.”

10.2. Inventory of Pesticides

Under state and federal law, a pesticide is any substance intended to control, destroy, repel, or otherwise mitigate a pest. Any organism that causes damage or economic loss, or transmits or produces disease, may be the target pest. Pests can be insects or animals (e.g. mice), unwanted plants (weeds) or organisms that cause plant diseases. “Pesticide” is an umbrella term that includes many kinds of chemicals—natural and synthetic. A pesticide is any substance intended to control, destroy, repel or attract a pest. Any living organism that causes damage, economic loss, and/or transmits or produces disease may be the target pest. Some common pesticides include insecticides, herbicides, rodenticides, molluscicides, fungicides, repellents, disinfectants and sanitizers. (California Department of Pesticide Regulation fact sheet, available at <http://www.cdpr.ca.gov/>).

At this cultivation operation, pests will be controlled by employing only approved, organic-certified pesticides. Weeds will be controlled using a line trimmer or mulch; herbicides will not be used. Live traps will be used for rodents.

The following pesticides may be used at this facility, as needed:

- insecticidal bacteria such as *Bacillus thuringiensis*
- Horticultural oils, herbal oils, and vegetable oils
- Insecticidal soaps
- Minerals such as sulfur or potassium and sodium bicarbonate
- alcohol or other disinfectants

Note that the Department of Pesticide Regulation has developed a brief synopsis of appropriate pesticide usage called *Legal Pest Management Practices for Marijuana Growers in California* which can be found as Attachment D in Order R5-2015-0113. Currently, no regulated pesticides are registered for use on Cannabis. Therefore, commercial cultivators are limited to only using pesticides that are exempt from residue-tolerance requirements and are either: (1) registered and labeled for a use that is broad enough to include use on cannabis (e.g., unspecified green plants), or (2) exempt from registration requirements as a minimum-risk pesticide under FIFRA Section 25(b). The CA Department of Pesticide Regulation lists allowable pesticides in their publication “Legal Pest Management Practices for Marijuana Growers in California.” This publication is presented in the Appendix.

10.3. Pesticide Application and Storage Protocols

Note that the Department of Pesticide Regulation has developed a brief synopsis of appropriate pesticide usage called *Legal Pest Management Practices for Marijuana Growers in California* which can be found as Attachment D in Order R5-2015-0113. Currently, no pesticides are registered for use on Cannabis. Therefore, commercial cultivators are limited to only using pesticides that are exempt from residue-tolerance requirements and are either: (1) registered and labeled for a use that is broad enough to include use on cannabis (e.g., unspecified green plants), or (2) exempt from registration requirements as a minimum-risk pesticide under FIFRA Section 25(b).

The CDFA CalCannabis Program describes pesticide use as follows:

“Although California Department of Pesticide Regulation (CDPR) is responsible for managing California’s statewide pesticide regulatory program, the local enforcement of pesticide use regulations is delegated to County Agricultural Commissioners (CACs). With oversight by CDPR, CACs plan and develop county programs and regulate pesticide use to ensure that applicators comply with label directions and pesticide laws and regulations (CDPR 2011). CACs oversee pesticide use reporting, promote best management practices, and monitor field applications, and they may assist in cleanup of accidental pesticide spills.

CACs inspect operations and records of growers, nonagricultural (including industrial and institutional) applicators, pest control dealers, agricultural pest control advisers (PCAs), farm labor contractors, and government agencies for compliance with worker protection standards and other pesticide safety requirements. CACs, assisted by CDPR, investigate incidents in which pesticides harm agricultural workers, people nearby, and the

environment, including environmental damage (such as fish or wildlife kills) and water quality contamination. When an enforcement action is needed, CACs have the option to revoke or suspend the right of a company to do business in their county or to issue civil or criminal penalties (CDPR 2011)....License and certificate types issued by CDPR under the pesticide regulatory program include, but are not limited to, the following (CDPR 2017).....

Because there are no restricted-use pesticides registered for use on cannabis, application of pesticides for cannabis cultivation would not require any type of license or certificate. Cultivators, however, may obtain a QAC or QAL, or private applicator certificate, or hire individuals with these credentials, in order to avail themselves of information such as proper mixing, loading, and application techniques and selection and use of personal protective equipment. Cannabis cultivators would not necessarily be required to obtain the services of a PCA but, nonetheless, may choose to do so in order to get professional advice on pest control.” (CDFA 2017)

Cultivators must comply with pesticide laws and regulations as enforced by the Department of Pesticide Regulation. The CDFA CalCannabis Licensing Program has the following pesticide application and storage protocols, which will be implemented:

- (1) Comply with all pesticide label directions;
- (2) Store chemicals in a secure building or shed to prevent access by wildlife;
- (3) Contain any chemical leaks and immediately clean up any spills;
- (4) Apply the minimum amount of product necessary to control the target pest;
- (5) Prevent offsite drift;
- (6) Do not apply pesticides when pollinators are present;
- (7) Do not allow drift to flowering plants attractive to pollinators;
- (8) Do not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;
- (9) Do not apply pesticides when they may reach surface water or groundwater; and
- (10) Only use properly labeled pesticides. If no label is available consult the Department of Pesticide Regulation.

Pesticides will be used according to the instructions on the label or the material safety data sheets (MSDS). County regulations also apply to listed pesticides. Pesticides will be stored in a stormproof shed, Conex container, and/or outbuilding so that stormwater is not contaminated. Chemicals will be properly labeled and open containers sealed when stored. When handling chemicals, staff will use personal protective equipment such as safety glasses, gloves, dust mask or respirator, boots, pants and long-sleeved shirt. Pesticides will not be applied on windy days or within 24 hours of a forecasted rain event.

10.4. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

11.0 SECURITY

11.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Security:

(a) Intent: To minimize criminal activity, provide for safe and secure working environments, protect private property, and to prevent damage to the environment. The Applicant shall provide adequate security on the premises, as approved by the Sheriff and pursuant to this section, including lighting and alarms, to ensure the safety of persons and to protect the premises from theft.

(b) Security Plan. This section shall include at a minimum:

a. A description of the security measures to be taken to:

(1) Prevent access to the cultivation site by unauthorized personnel and protect the physical safety of employees. This includes, but is not limited to:

i. Establishing physical barriers to secure perimeter access and all points of entry (such as locking primary entrances with commercial-grade, non-residential door locks, or providing fencing around the grounds, driveway, and any secondary entrances including windows, roofs, or ventilation systems);

ii. Installing a security alarm system to notify and record incident(s) where physical barriers have been breached;

iii. Establishing an identification and sign-in/sign-out procedure for authorized personnel, suppliers, and/or visitors;

iv. Maintaining the premises such that visibility and security monitoring of the premises is possible; and

v. Establishing procedures for the investigation of suspicious activities.

(2) Prevent theft or loss of cannabis and cannabis products. This includes but is not limited to:

i. Establishing an inventory system to track cannabis material and the personnel responsible for processing it throughout the cultivation process;

ii. Limiting access of personnel within the premises to those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties;

iii. Supervising tasks or processes with high potential for diversion (including the loading and unloading of cannabis transportation vehicles); and

iv. Providing designated areas in which personnel may store and access personal items.

(3) Identification of emergency contact(s) that is/are available 24 hours/seven (7) days a week including holidays. The plan shall include the name, phone number and facsimile number or email address of an individual working on the commercial cultivation premises, to whom notice of problems associated with the operation of the commercial cultivation establishment can be provided. The commercial cultivation establishment shall keep this information current at all times. The applicant shall make every good faith effort to encourage neighborhood residents to call this designated person to resolve operating problems, if any, before any calls or complaints are made to the County.

(4) The permittee shall maintain a record of all complaints and resolution of complaints and provide a tally and summary of issues the annual Performance Review Report.

(5) A description of fences, location of access points, and how access is controlled.

(6) Video Surveillance.

i. At a minimum, permitted premises shall have a complete digital video surveillance system with a minimum camera resolution of 1080 pixel. The video surveillance system shall be capable of recording all pre-determined surveillance areas in any lighting conditions.

ii. The video surveillance system shall be capable of supporting remote access by the permittee.

iii. To the extent reasonably possible, all video surveillance cameras shall be installed in a manner that prevents intentional obstruction, tampering with, and/or disabling.

iv. Areas that shall be recorded on the video surveillance system include, but are not limited to, the following:

a. The perimeter of the cannabis cultivation site and cannabis nursery,

- b. Areas where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises;*
- c. Areas where cannabis is destroyed;*
- d. Limited-access areas;*
- e. Security rooms;*
- f. Areas containing surveillance-system storage devices, in which case, at least one camera shall record the access points to such an area; and*
- g. The interior and exterior of all entrances and exits to the cannabis cultivation sites and cannabis nursery including all buildings where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises.*
- v. The surveillance system shall record continuously 24 hours per day and at a minimum of 30 frames per second.*
- vi. All exterior cameras shall be waterproof, I-66 minimum.*
- vii. All interior cameras shall be moisture proof.*
- viii. Cameras shall be color capable.*
- ix. Video management software shall be capable of integrating cameras with door alarms.*
- x. Video recordings shall be digital.*
- xi. Thermal technology shall be use for perimeter fencing.*
- xii. All cameras shall include motion sensors that activates the camera when motion is detected.*
- xiii. In areas with inadequate lighting for the cameras being used, sufficient lighting shall be provided to illuminate the camera's field of vision.*
- xiv. All recording shall be located in secure rooms or areas of the premises in an access and environment-controlled environment which is separate from the room where the computer and monitoring equipment is located.*
- xv. All surveillance recordings shall be kept on the applicant's recording device or other approved location for a minimum of 30 days.*
- xvi. All video surveillance recordings are subject to inspection by the Department and shall be copied and sent, or otherwise provided, to the Department upon request.*
- xvii. The video recordings shall display the current date and time of recorded events. Time is to be measured in accordance with the U.S. National Institute Standards and Technology standards. The displayed date and time shall not significantly obstruct the view of recorded images.*

(7) Fences

- i. All commercial cannabis cultivation sites shall be enclosed by a fence. The fence shall include, at a minimum, the following: Posts set into the ground. The posts may be steel tubing, timber or concrete and may be driven into the ground or set in concrete. End, corner or gate posts, commonly referred to as "terminal posts", must be set in concrete footing or otherwise anchored to prevent leaning under the tension of a stretched fence. Posts set between the terminal posts shall be set at intervals not to exceed 10 feet. A top horizontal rail is required between all posts. The fence shall be attached to the posts and top horizontal rail.*
- ii. No barbed wire, razor wire or similar design shall be used.*
- iii. The cultivation area shall be screened from public view. Methods of screen may include, but is not limited to, topographic barriers, vegetation, or solid (opaque) fences.*

The Ordinance also identifies these prohibited activities that are relevant to this sub-plan:

"All lights used for cannabis related permits including indoor or mixed light cultivation of cannabis shall be fully contained within structures or otherwise shielded to fully contain any light or glare involved in the cultivation process. Artificial light shall be completely shielded between sunset and sunrise.

Security lighting shall be motion activated and all outdoor lighting shall be shielded and downcast or otherwise positioned in a manner that will not shine light or allow light glare to exceed the boundaries of the lot of record upon which they are placed."

11.2. Security Measures

General security measures will consist of the following:

- A security plan, updated as needed
- staff screening process
- personnel rules and responsibilities (to be incorporated into an employee handbook in the future)
- physical barriers, including signage, road gates, security fencing with locked gates, and commercial-grade locks on all interior doors
- an alarm system that can notify security personnel and record incidents where physical barriers have been breached;
- theft and loss control program
- video surveillance system.

The Security Officer(s) for the cultivation site are:

- Lauren and Amy Goodman; phone 707-813-0661; email ldsgoodman@gmail.com
- _____

Any complaints or problems associated with the operation of the commercial cultivation establishment will be directed to the Security Officer. The Security Officer should make every good faith effort to encourage neighborhood residents to call the designated Security Officer to resolve operating problems, if any, before any calls or complaints are made to the County. The Security Officer should maintain a record of all complaints and resolution of complaints and provide a tally and summary of issues the annual Performance Review Report. The Staff Screening Process is described in the Operations Manual subsection of this Plan.

Personnel rules and responsibilities are as follows:

- Obey the rules of the Security Plan
- Sign in when entering the facility (or property) and sign out when exiting the facility (or property)
- Report suspicious activity
- Do not carry any weapons
- Do not engage in lengthy conversation with the public or respond directly to complaints: direct all such concerns to the Security Officer.
- Only authorized vehicles are allowed in operational areas.
- Do not bring backpacks or other unnecessary storage devices that might complicate the theft control program. Lockers will be provided for personal items.
- Do not enter restricted areas unless authorized to do so.

The cultivation operation is accessed by a private gravel road off of Western Mine Road. There is a locked bar gate at the entrance (see Map). The cultivation operations are closed to the public. Visitation is only allowed when specific permission is granted. All staff, all suppliers, all product transporters, and all visitor must sign the log in / log out sheet. Signage will be posted that states that the operational areas have restricted access and are closed to the public. The signage will not advertise the presence of Cannabis products.

11.3. Theft and Loss Control

The County requires an inventory system to track Cannabis material and personnel handling the material. This requirement will be fulfilled by following the requirements of the CalCannabis Licensing Program, which creates a Track-and Trace System. Sections 8401 through 8405 (quoted in part) state:

“The Department shall establish a track-and-trace system for unique identifiers of cannabis and nonmanufactured cannabis products, which all licensees shall use. Each licensee shall report in the track-and-trace system the disposition of immature and mature plants, as required by Section 8402 of this Chapter, and nonmanufactured cannabis products on the licensed premises and any transfers associated with commercial cannabis activity between licensees.

(a) The licensee is responsible for the accuracy and completeness of all data and information entered into the track-and- trace system. Data entered into the track-and-trace system is assumed to be accurate and can be used to take enforcement action against the licensee if not corrected.

(b) Attempts to falsify or misrepresent data or information entered into the track-and-trace system is a violation and subject to enforcement.

(c) Each licensee shall use the track-and-trace system for recording all applicable commercial cannabis activities. Each licensee shall do all of the following activities:

(1) Establish an account in the track-and-trace system prior to engaging in any commercial cannabis activities associated with their license and maintain an active account while licensed;

(2) Designate at least one of the owners or the responsible party named in the application to be the track-and-trace system administrator....”

For this cultivation site, the Track-And-Trace System Administrators are:

- Lauren and Amy Goodman; phone 707-813-0661; email ldsgoodman@gmail.com
- _____

Personnel will be granted access within the premises to only those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties. There will be supervision of tasks or processes with a high potential for diversion (including the loading and unloading of cannabis transportation vehicles). Supervision may include video surveillance and/or the requirement that the Security Officer or their designee be present.

11.4. Video Surveillance

Each cultivation facility will have a comprehensive digital video surveillance system. Each camera must have the following specifications, according to the Ordinance:

- minimum resolution of 1080 pixels
- digitally record continuously 24 hours per day and at a minimum of 30 frames per second, color.
- exterior cameras shall be waterproof, I-66 minimum.
- interior cameras shall be moisture proof.
- display the current date and time of recorded events
- interior cameras shall have motion sensors that activates the camera when motion is detected.
- sufficient lighting shall be provided to illuminate the camera’s field of vision
- thermal (infra-red) motion sensing technology shall be use for perimeter fencing.

The video management software shall be capable of integrating cameras with door alarms. The video surveillance system shall be capable of recording all pre-determined surveillance areas in any lighting conditions. The video surveillance system shall be capable of supporting remote access by the permittee. To the extent reasonably possible, all video surveillance cameras shall be installed in a manner that prevents intentional obstruction, tampering with, and/or disabling.

Areas that shall be recorded on the video surveillance system include, but are not limited to, the following:

- a. The perimeter of the cannabis cultivation site and cannabis nursery,
- b. Areas where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises;
- c. Areas where cannabis is destroyed;
- d. Limited-access areas;
- e. Security rooms;
- f. Areas containing surveillance-system storage devices, in which case, at least one camera shall record the access points to such an area; and
- g. The interior and exterior of all entrances and exits to the cannabis cultivation sites and cannabis nursery including all buildings where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and/or unloaded for transportation, prepared, or moved within the premises.

All recording shall be located in secure rooms or areas of the premises in an access and environment-controlled environment which is separate from the room where the computer and monitoring equipment is located. All surveillance recordings shall be kept on the applicant's recording device or other approved location for a minimum of 30 days. Data transfer will be by coax cable or by Wi-Fi router. Power supplies shall be self-contained, such as solar arrays and batteries.

11.5. Fencing

The cultivation site will be enclosed with a sturdy fence. The posts should be set in the ground and should be made of steel tubing (at least 3" diameter) or wood posts (at least 4" diameter). Terminal posts should be set in concrete or otherwise anchored to prevent leaning under the tension of stretched fence panels. Post interval should not exceed 10 feet. A top horizontal rail should be installed between each post interval. Fence panels should consist of metal mesh "cyclone" fabric or welded wire mesh. Barbed wire or razor wire is prohibited from use on the top rails. If required by the County, opaque screening will be added: this may consist of plastic slats for cyclone fencing or plastic woven fabric (e.g., wind screens).

Each fenced cultivation compound will have at least 1 locking swing gate. The gate will typically consist of metal tube frame and the paneling will be the same as described above. The gate should be large enough for a service vehicle to ingress/egress. The gate will be secured with a metal padlock. Keys or lock combinations should be controlled by the Security Officer. It is recommended that vegetation screening be planted to obscure views of the cultivation facilities from public roads.

11.6. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

12.0 STORM WATER MANAGEMENT

12.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Storm Water Management:

- (a) Intent: To protect the water quality of the surface water and the stormwater management systems managed by Lake County and to evaluate the impact on downstream property owners.*
- (b) All permittees shall manage storm water runoff to protect downstream receiving water bodies from water quality degradation.*
- (c) All cultivation activities shall comply with the California State Water Board, the Central Valley Regional Water Quality Control Board, and the North Coast Region Water Quality Control Board orders, regulations, and procedures as appropriate.*
- (d) Outdoor cultivation, including any topsoil, pest management, or fertilizer used for the cultivation cannabis shall not be located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. For purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the Rumsey Gauge.*
- (e) The illicit discharge of irrigation or storm water from the premises, as defined in Title 40 of the Code of Federal Regulations, Section 122.26, which could result in degradation of water quality of any water body is prohibited.*
- (f) All permittees shall prepare a Storm Water Management Plan based on the requirements of the California Regional Water Quality Control Board Central Valley Region or the California Regional Water Quality Control Board North Coast Region to be approved by the Lake County Water Resources Department. In addition to those requirements, the plan shall include:*
 - a. Identification of any Lake County maintained drainage or conveyance system that the stormwater is discharged into and documentation that the stormwater discharge is in compliance with the design parameters of those structures.*
 - b. Identification of any public roads and bridges that are downstream of the discharge point and documentation that the stormwater discharge is in compliance with the design parameters of any such bridges.*
 - c. Documentation that the discharge of stormwater from the site will not increase the volume of water that historically has flow onto adjacent properties.*
 - d. Documentation that the discharge of stormwater will not increase flood elevations downstream of the discharge point.*
 - e. Documentation that the discharge of stormwater will not degrade water quality of any water body.*
 - f. Documentation of compliance with the requirements of Chapter 29, Storm Water Management Ordinance of the Lake County Ordinance Code.*
 - g. Describe the proposed grading of the property.*
 - h. Describe the storm water management system.*
 - i. Describe the best management practices (BMPs) that will be used during construction and those that will be used post-construction. Post-construction BMPs shall be maintained through the life of the permit.*
 - j. Describe what parameters will be monitored and the methodology of the monitoring program.*

If the total area of ground disturbance during construction of a project is 1 or more acres, the project proponent must enroll under the State Water Quality Control Board's Construction General Permit prior to the initiation of construction. In conjunction with enrollment under this Permit, a Storm Water Pollution Prevention Plan, Erosion Control Plan, and a Hazardous Materials Management/Spill Response Plan must be created and implemented during construction to avoid or minimize the potential for erosion, sedimentation, or accidental release of hazardous materials.

12.2. List of Stormwater Manager(s) and Contact Information

The Stormwater Manager(s) currently assigned to the cultivation operations are:

- Lauren and Amy Goodman; phone 707-813-0661; email ldsgoodman@gmail.com
- _____

- the default stormwater management consultant is: Dr. G.O. Graening, QSD #00473, QISP #597.

The stormwater manager shall have primary responsibility and significant authority for the implementation, maintenance, inspection, and amendments to the Stormwater Management Plan. Duties of the stormwater manager include but are not limited to:

- Ensuring full compliance with the Plan and the Chapter 29, Storm Water Management Ordinance of the Lake County Ordinance Code;
- Implementing all elements of the Plan, including but not limited to implementation of prompt and effective erosion and sediment control measures, and implementing all non-storm water management, and materials and waste management activities (such as monitoring discharges (dewatering, diversion devices); general site clean-up; vehicle and equipment cleaning, fueling and maintenance; spill control; ensuring that no materials other than storm water are discharged in quantities which will have an adverse effect on receiving waters or storm drain systems; etc.);
- Inspections (pre-storm, during storm, and post-storm) or designating qualified personnel to do so;
- Routine inspections as specified in the cultivation operation's specifications or described in the Plan;
- Preparing any annual compliance certification;
- Ensuring elimination of all unauthorized discharges;
- The storm water manager shall be assigned authority to mobilize crews to make immediate repairs to the control measures;
- Coordinate with the landowner or cultivator to assure all the necessary corrections/repairs are made immediately, and that the project complies with the Plan and relevant permits.

12.3. Compliance

12.3.1. Setbacks and Buffers

The Ordinance requires that all cultivation operations be located at least 100 feet away from waterbodies (i.e. spring, top of bank of any creek or seasonal stream [interpreted to be Class II], edge of lake, wetland or vernal pool). The Water Board requires various setbacks depending upon the class of the watercourse. Setback distances were stated earlier in this Plan. Vegetated buffers should be maintained or created so that stormwater runoff can be detained and filtered by vegetation. This may include vegetated swales or bioswales.

12.3.2. Water Board Permitting

This cultivation operation is enrolled in the State Water Resources Control Board's *Order WQ 2019-0001-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (General Order). Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices, buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. Note also that a sediment and erosion control plan is being implemented as part of the larger Site Management Plan (bound separately).

12.3.3. Grading, Discharge Flows, and Downstream Effects

The cultivation operations will not alter the hydrology of the parcels significantly. To alter the hydrology significantly, several acres of new impervious surfaces would need to be created. Establishment of the cultivation operations requires no grading because they have been located on lands that were conditioned and contoured years ago. Establishment of the cultivation operations does not require the construction of new buildings, paved roads, or other permanent and impermeable surfaces. The large vegetated buffers surrounding this facility, coupled with perimeter ditches (vegetated swales), serve to moderate stormflows and regulate stream volumes such that flooding can be completely avoided. These large vegetated buffers and swales allow stormwater that is discharged from operation areas to be slowed, filtered, and percolate into soils. In general, stormwater on the parcel infiltrates the soil.

Should a new facility with impervious surfaces be planned and constructed, the Ordinance requires documentation that downstream hydrology and public roads and bridges will not be negatively impacted.

12.4. Storm Water Management

12.4.1. Water Pollution Control Schedule

BMPs should be deployed in a sequence to follow the progress of site preparation / tilling / cultivation. As the locations of soil disturbance change, erosion and sedimentation controls should be adjusted accordingly to control storm water runoff at the downgrade perimeter and drain inlets. BMPs should be mobilized as follows:

- Year-round:
 - o The site manager or stormwater manager should monitor weather using National Weather Service reports (<https://www.weather.gov/>) to track conditions and alert crews to the onset of rainfall events.
 - o Disturbed soil areas should be stabilized with temporary erosion control or with permanent erosion control as soon as possible after grading or construction is complete.
- During the rainy season:
 - o Disturbed areas should be stabilized with temporary or permanent erosion control before rain events.
 - o Disturbed areas that are substantially complete should be stabilized with permanent erosion control (soil stabilization) and vegetation (if within seeding window for seed establishment).
 - o Prior to forecast storm events, temporary erosion control BMPs should be deployed and inspected.
- During the non-rainy season:
 - o The project schedule should sequence earth-moving activities with the installation of both erosion control and sediment control measures. The schedule should be arranged as much as practicable to leave existing vegetation undisturbed until immediately prior to grading.

Sufficient quantities of temporary sediment control materials should be maintained on-site throughout the duration of the project, to allow implementation of temporary sediment controls in the event of predicted rain, and for rapid response to failures or emergencies. This includes implementation requirements for active areas and non-active areas before the onset of rain. The following table summarizes the general schedule of implementation of site BMPs.

Water Pollution Control Schedule

Phase, Activity, or Milestone	Date
File any needed permit registration documents	immediately
Implementation of rainy season BMPs	October 1 st of every year
Rainy season begins	October 15
Implementation of dry season BMPs	April 1 st of every year
Dry season begins	April 15
Repair / replacement of erosion control devices	see BMP section of this Plan
Site inspections	see Inspection section of this Plan
Submit Annual Report	annually, as required
Expansion / modification of cultivation operational area	modify this Plan within 30 days

12.4.2. Pollutant Source Identification

Inventory of Materials and Activities that May Pollute Storm Water

Construction or cultivation activities that have the potential to contribute sediment to storm water discharges include:

- Tilling, grading and excavation operations;
- Soil import/export operations;
- Structure installation process; and
- Paving operations.

The following table provides a list of materials that may be used and activities that may be performed that will have the potential to contribute pollutants, other than sediment, to storm water runoff.

Summary of Potential Project Pollutant Other Than Sediment

Activity/Material Type	Potential Pollutant
Vehicle lubricants and fuels, including oil, grease, diesel and gasoline, and coolants	Petroleum hydrocarbons, volatile organic compounds (VOCs)
Asphaltic emulsions associated with asphalt-concrete paving operations	Petroleum hydrocarbons, VOCs
Portland cement, masonry, and concrete products, muriatic acid, etc.	Materials with a low or high pH, materials with high alkalinity, metals
Road base and subbase material	Materials with high alkalinity or high pH, metals
Gardening materials and wastes	Pesticides, nutrient pollution (nitrates, phosphates, biological oxygen demand, etc.), metals
Treated lumber (materials and waste)	Arsenic, copper, other metals, creosote
Material packaging and site personnel	General litter (municipal solid waste, universal waste)
Portable toilets	Septic waste (fecal coliform, biological oxygen demand)

12.4.3. Existing (pre-construction) Control Measures

The following are existing (pre-construction) control measures within the project site:

- vegetated drainage swales
- sufficient buffer distances between cultivation areas and drainages
- armoring of driveways and roads with gravel, roadbase, or asphalt
- preservation of existing vegetation

12.4.4. Best Management Practices

The following resources can be consulted for BMP selection and implementation:

- California Stormwater Quality Association. 2011. California Stormwater Best Management Practice Handbook – Construction. California Stormwater Quality Association, Menlo Park, California 886 pp.
- California Stormwater Quality Association. 2014. Stormwater Best Management Practice Handbook Portal: Industrial and Commercial. California Stormwater Quality Association, Menlo Park, California. 474 pp.
- California Department of Transportation's Construction Site BMPs Handbook, available electronically at <https://dot.ca.gov/programs/construction/storm-water-and-water-pollution-control/manuals-and-handbooks>
- California Department of Transportation's Construction Site BMP Fact Sheets, available electronically at <https://dot.ca.gov/programs/construction/storm-water-and-water-pollution-control/construction-site-bmp-fact-sheets>
- USEPA NPDES Storm Water Program's National Menu of BMPs website at <https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#edu>

The following subsections discuss BMPs that have been selected for implementation in this project. Implementation and location of BMPs are shown in the Maps section. The Appendix includes a list of the fact sheets of the BMPs selected for this project.

Erosion Control

Erosion control, also referred to as soil stabilization, consists of source control measures that are designed to prevent soil particles from detaching and becoming transported in storm water runoff. Erosion control BMPs protect the soil surface by covering and/or binding soil particles. This project will implement the following practices for effective temporary and final erosion control during construction:

- Preserve existing vegetation where required and when feasible;
- Apply temporary erosion control to exposed areas. Reapply as necessary to maintain effectiveness;
- Implement temporary erosion control measures at regular intervals throughout the defined rainy season to achieve and maintain stability. Implement erosion control prior to the defined rainy season;
- Control erosion in concentrated flow paths by applying erosion control devices.
- Divert run-on and stormwater generated from within the facility away from all erodible materials; and
- If sediment traps or basins are installed, ensure that they are working properly and emptied of accumulated sediment and litter.

Specific erosion control BMPs that can be implemented are listed here and the Construction and Industrial BMP fact sheets are included in the Appendix:

- EC-2: Preservation of Existing Vegetation
- EC-3: Hydraulic Mulch
- EC-4: Hydroseeding
- EC-5: Soil Binders
- EC-6: Straw Mulch
- EC-7: Geotextiles & Mats
- EC-8: Wood Mulching
- EC-9: Earth Dikes & Drainage Swales
- SC-33: Outdoor Storage of Raw Materials
- SC-40: Contaminated or Erodible Surfaces
- TC-30: Vegetated Swale
- TC-31: Vegetated Buffer Strip

Erosion and sediment control diagrams are provided in the Maps section that indicate the recommended type and placement of erosion control devices.

Sediment Control

Sediment controls are structural measures that are intended to complement and enhance the selected erosion control measures and reduce sediment discharges from active construction areas. Sediment controls are designed to intercept and settle out soil particles that have been detached and transported by the force of water. This project will incorporate sediment control measures as needed.

Specific sediment control BMPs that can be implemented are listed here and the Construction BMP Fact Sheets are included in the Appendix:

- SE-1: Silt Fence
- SE-3: Sediment Trap
- SE-5: Fiber Rolls
- SE-6: Gravel Bag Berm
- SE-8: Sand Bag Barrier
- SE-9: Straw Bale Barrier
- TC-32: Bioretention

Erosion and sediment control diagrams are provided in the Maps section that indicate the recommended type and placement of sediment control devices.

Road Maintenance

Note that the Cannabis General Order states: *“Site development and/or road building and maintenance activities associated with cannabis cultivation are subject to this General Order.”*

This property has no vehicle stream crossings (see Exhibits). The property one access road system that is properly designed. Most sections are well armored. Additional gravel or roadbase is recommended in some locations. Some rolling dips are recommended. Driveways and roads will be maintained so that significant erosion does not occur. This may include wetting dusty roads, armoring with gravel, roadbase, or asphalt, patching holes, and maintaining

drainage features such as rolling dips, water bars, culverts, and side ditches.

The following guidebook should be referenced for road maintenance:

- Handbook for Forest, Ranch, & Rural Roads: A Guide for Planning, Designing, Constructing, Reconstructing, Upgrading, Maintaining, and Closing Wildland Roads.
[available at: <http://www.pacificwatershed.com/sites/default/files/RoadsEnglishBOOKapril2015b.pdf>]

Monitoring / BMP Inspection and Maintenance

Sufficient quantities of temporary sediment control materials should be maintained on-site throughout the rainy season, to allow implementation of temporary erosion and sediment controls in the event of predicted rain, and for rapid response to failures or emergencies.

A visual monitoring (inspection) program should be implemented, and an inspection would ideally be performed prior to each qualifying rain event and contain the following focal areas:

- All storm water drainage areas to identify any spills, leaks, or uncontrolled pollutant sources
- All BMPs to identify whether they have been properly implemented
- Any storm water storage and containment areas to detect leaks and ensure maintenance of adequate freeboard

Note that stormwater sampling procedures are discussed in the Water Use subsection.

Training

A copy of the Plan should be made available to the site personnel or contractor representatives engaged in the maintenance or installation of BMPs. Site inspectors observing pollution caused by ineffective construction or cultivation practices should inform site personnel of appropriate and proper erosion and sedimentation control practices, along with special follow-up inspection for further training. The Stormwater Manager or general contractor should organize orientation sessions with all installation, inspection, and maintenance personnel upon initiation of a specific project activity or change in key personnel. These sessions should be setup to ensure that all contractor and sub-contractor operations are implemented in accordance with this Plan. Training sessions should be included as part of regular safety meetings to familiarize works with the requirements of the Plan.

12.5. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

13.0 WASTE MANAGEMENT

13.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Waste Management:

(a) Intent: To minimize the generation of waste and dispose of such waste properly, to prevent the release of hazardous waste into the environment, minimize the generation of cannabis vegetative waste and dispose of cannabis vegetative waste properly, and manage growing medium and dispose of growing medium properly.

(b) This section shall include the following components:

a. Solid Waste Management

The solid waste section shall include:

- 1. Provide an estimate of the amount of solid waste that will be generated on an annual basis and daily during peak operational seasons, broken down into the following categories: paper; glass; metal; electronics; plastic; organics; inerts; household hazardous waste; special waste, and mixed residue*
- 2. Describe how the permittee will minimize solid waste generation, including working with vendors to minimize packaging.*
- 3. Describe the waste collection frequency and method.*
- 4. Describe how solid waste will be temporarily stored prior to transport to a compost, recycling, or final disposal location.*
- 5. Describe the composting, recycling, or final disposal location for each of the above categories of solid waste.*

b. Hazardous Waste Management

The hazardous waste section shall include:

1. Hazard Analysis.

The applicant shall conduct a hazard analysis to identify or evaluate known or reasonably foreseeable hazards for each type of cannabis product produced at their facility in order to determine whether there exist any hazards requiring a preventive control. The hazard analysis shall include:

The identification of potential hazards, including:

- i. Biological hazards, including microbiological hazards;*
- ii. Chemical hazards, including radiological hazards, pesticide(s) contamination, solvent or other residue, natural toxins, decomposition, unapproved additives, or food allergens; and/or*
- iii. Physical hazards, such as stone, glass, metal fragments, hair or insects.*

The evaluation of the hazards identified in order to assess the severity of any illness or injury that may occur as a result of a given hazard, and the probability that the hazard will occur in the absence of preventive controls.

The hazard evaluation shall consider the effect of the following on the safety of the finished cannabis product for the intended consumer:

- i) The sanitation conditions of the manufacturing premises;*
- ii) The product formulation process;*
- iii) The design, function and condition of the manufacturing facility and its equipment;*
- iv) The ingredients and components used in a given cannabis product;*
- v) The operation's transportation and transfer practices;*
- vi) The facility's manufacturing and processing procedures;*
- vii) The facility's packaging and labeling activities;*
- viii) The storage of components and/or the finished cannabis product;*
- ix) The intended or reasonably foreseeable use of the finished cannabis product.*
- x) Any other relevant factors.*

(2) Management Plan

The Management Plan shall:

- i. Identify all Resource Conservation and Recovery Act (RCRA), Non-RCRA hazardous waste and Universal wastes and the volume of each.*

- ii. Identify all containers and container management.
- iii. Describe storage locations and chemical segregation procedures.
- iv. Describe hazardous waste manifest and recordkeeping protocol.
- v. Outline inspection procedures.
- vi. Identify emergency spill response procedures.
- vii. Describe staff responsibilities.
- viii. Describe the staff training program.
- ix. Describe the methodology on how the amount of hazardous materials and waste that is generated on the site, the amount that is recycled, and the amount and where hazardous materials and waste is disposed of, is measured, and
- x. Include a map of any private drinking water well, spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool on the lot of record or within 100 feet of the lot of record and a 100 foot setback from any identified private drinking water well, spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool. The map shall also include any public water supply well on the lot of record or within 200 feet of the lot of record and a 200 foot setback from any public water supply well.

Pursuant to the California Health and Safety Code, the use of hazardous materials shall be prohibited except for limited quantities of hazardous materials that are below State threshold levels of 55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of compressed gas. The production of any Hazardous Waste as part of the cultivation process is prohibited.

(c) Cannabis Vegetative Material Waste Management

The cannabis vegetative material waste management section shall include:

- (1) Provide an estimate of the type and amount of cannabis vegetative waste that will be generated on an annual basis.
- (2) Describe how the permittee will minimize cannabis vegetative waste generation.
- (3) Describe how solid waste will be disposed.
- (4) Describe the methodology on how the amount of cannabis vegetative waste that is generated on the site, the amount that is recycled, and the amount and where cannabis vegetative waste is disposed of is measured.

(d) Growing Medium Management

The growing medium management section shall include:

- (1) Provide an estimate of the type and amount of new growing medium that will be used and amount of growing medium will be disposed of on an annual basis.
- (2) Describe how the permittee will minimize growing medium waste generation.
- (3) Describe any non-organic content in the growing medium used (such as vermiculite, silica gel, or other non-organic additives).
- (4) Describe how growing medium waste will be disposed.
- (5) Describe the methodology on how the amount of growing medium waste that is generated on the site, the amount that is recycled, and the amount and where growing medium waste is disposed of, is measured.

13.2. Solid Waste Management

13.2.1. Solid Waste Sources and Volumes

The volume of solid waste generated at the cultivation site is estimated below on a peak daily basis and an annual basis, in pounds.

Estimated Solid Waste Generation Per Cultivation Site

	Annual Basis (pounds per year)	Peak daily (pounds per day)
Paper	5	<1
Glass	10	<1

Metal	10	<1
Electronics	1	n/a
Plastic	100	10
Organics	1,000	100
Inerts*	10	<1
Household hazardous waste	1	n/a
Special waste	1	n/a
Mixed residue	10	<1

* Inert waste is waste which is neither chemically nor biologically reactive and will not decompose. Examples are sand and concrete.

Sanitary Waste

A flush toilet is located inside the residence, which will be available for facility staff. Wastewater from the home is disposed via a septic system. The location of the septic tank and leachfield are shown in the exhibits.

For sites with residences, residential wastewater generation is about 50 gallons per person per day (which includes toilet, shower, kitchen, laundry, etc.)

During peak labor demands, a portable chemical toilet will be rented and maintained for facility staff. The servicing company is: _____. The frequency of service is: weekly; or monthly.

Note that under the Cannabis General Order, alternative sanitary waste disposal systems (e.g. outhouse, pit privy, or similar) are not typically allowed. Use of this alternative requires approval from the Regional Water Board Executive Officer. There are no outhouses, pit privies, or similar alternative disposal systems on this property.

13.2.2. Waste Collection, Storage, and Disposal

At least one solid waste bin will be located at each cultivation site and at any processing facility. Waste bins will consist of trash cans (20 or 35 gallon) with lids or roll-off dumpsters with lids. The locations of waste bins / containers are shown in the Maps section. These solid waste containers should not be used to dispose Cannabis green waste.

Recyclables will be segregated from solid waste and stored in bins. At weekly intervals, staff should transfer them by truck in trash cans, with tight lids or plastic garbage bags and tarped loads and deposit them in an appropriate recycling facility. Recyclables such as scrap metal, glass, metal and plastic containers, can be conveniently unloaded at a recycling drop-off center (a Lake County Integrated Waste Management facility or private facility). Cardboard and newspaper may be recycled or mixed in with other composting materials.

Yard waste, green waste, and other compostable materials will be segregated from the solid waste and shredded and composted onsite for reuse as mulch or as a soil amendment, or deposited at an appropriate transfer facility. Non-cannabis compost and recyclable wood can be dropped off at any compost facility where it is processed as new compost. Household toxic materials will be segregated from the solid waste and disposed of at a Lake County Integrated Waste Management facility.

Waste will be transported to an appropriate licensed facility by cultivation operation staff using personal vehicles or be hauled by a private waste-hauling contractor, such as Waste Management, Inc., or C & S Waste Solutions. The Lake County Integrated Waste Management facilities are:

- Eastlake Landfill, 16015 Davis Ave, Clearlake
- Lake County Waste Solutions Transfer Station and Recycling Center, 230 Soda Bay Road, Lakeport
- South Lake Refuse and Recycling Center, 16015 Davis Street, Clearlake
- Quackenbush Mountain Resource Recovery and Compost Facility, 16520 Davis Street, Clearlake

The following material handling and waste management measures will be implemented:

- Prevent or minimize handling of wastes that can be readily mobilized by contact with stormwater during a storm event;
- Contain all stored wastes (e.g., particulates, powders, shredded paper, etc.) that can be transported or dispersed by the wind or contact with stormwater during handling;
- Cover waste disposal containers and material storage containers when not in use;
- Divert run-on and stormwater generated from within the facility away from all stockpiled materials;
- Clean all spills of wastes that occur during handling in accordance with the spill response procedures); and
- Observe and clean as appropriate, any outdoor material or waste handling equipment or containers that can be contaminated by contact with chemical/industrial materials or wastes.

A sandbag barrier (Construction BMP Factsheet SE-8) can be placed around waste storage areas to prevent stormwater run-on from adjacent upstream areas. Materials can be elevated with pallets or cement blocks to minimize contact with stormwater. Spill clean-up materials, material safety data sheets, a material inventory, and emergency contact numbers should be maintained and stored in the residence or shipping container.

To reduce or eliminate pollution of storm water from stockpiles of soil and cultivation materials, stockpiles should be surrounded with sediment controls (Construction Factsheets BMP SE-5: Fiber Rolls, SE-8: Sandbag Barrier, and WM-3 Stockpile Management) as needed. Plastic covers can be used, as needed, before rain events or before strong winds begin.

BMPs will be implemented to minimize storm water contact with waste materials and prevent waste discharges (Construction Factsheet BMP WM-5 Solid Waste Management). Solid waste should be removed and disposed off-site at least weekly at a proper receiving facility. Any chemicals will be stored in the shipping containers or sheds. Chemical wastes will be appropriately and clearly marked in containers and segregated from other non-waste materials.

Storage of soil amendments and chemicals should employ the following CASQA Industrial BMP fact sheets:

- SC-31: Outdoor Liquid Container Storage
- SC-32: Outdoor Equipment Operations

- SC-33: Outdoor Storage of Raw Materials
- SC-34: Waste Handling and Disposal
- SC-40: Contaminated or Erodible Surfaces
- TC-30: Vegetated Swale
- TC-31: Vegetated Buffer Strip.

13.2.3. Solid Waste Reduction

The CDFA CalCannabis Program states, “*Cultivators must comply with the California Integrated Waste Management Act of 1989, which requires that all California cities and counties reduce, recycle, and compost at least 50 percent of wastes by 2000.*” (CDFA 2017)

Solid waste should be reduced using some combination of the following strategies and activities:

- Provide filtered water and dedicated cups instead of bottled water for staff.
- Use biodegradable containers.
- Use durable materials to reduce the use of disposable materials.
- Preferably select vendors that use reusable packaging and shipping containers; encourage vendors to do so.
- Minimize the volume of packaging material required by selecting products packaged efficiently or by buying in bulk.
- Employ soil fertility practices, such as nitrogen fixation cover crops and mulching, to reduce the importation of fertilizers and soil amendments.
- Use electricity-powered vehicles and equipment and install a solar array and battery storage.

13.3. Hazards and Hazardous Waste

13.3.4. EnviroStor Query

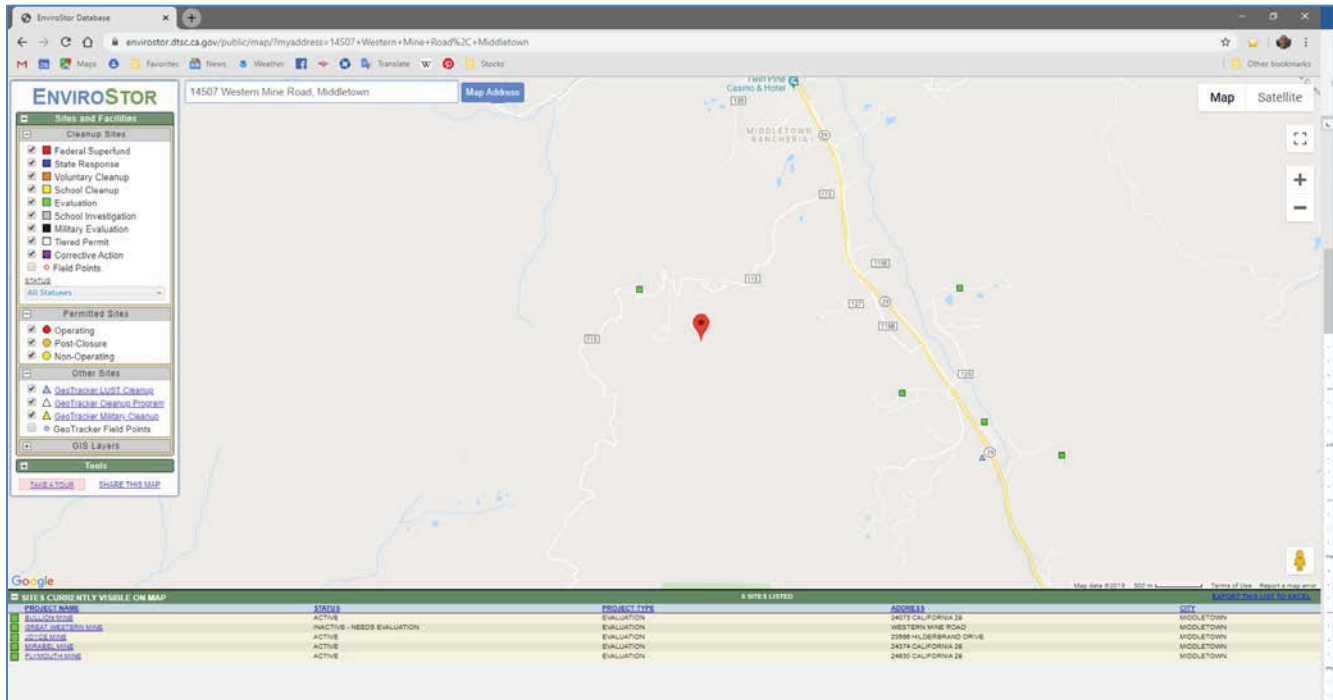
The Ordinance, as well as CalCannabis Licensing Program regulations (Section 8102[b][19]), require that applicants have conducted a hazardous materials record search of the EnviroStor database for the proposed premises. If hazardous sites were encountered, the regulations require that applicants provide documentation of protocols implemented to protect employee health and safety.

The following hazardous materials databases were queried on December 26, 2019 by Natural Investigations Co. scientists:

- EnviroStor is an online search and Geographic Information System tool for identifying sites that have known contamination or sites for which there may be reasons to investigate further. The EnviroStor database includes the following site types: Federal Superfund sites (National Priority List); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites (<https://www.envirostor.dtsc.ca.gov/public/>).
- GeoTracker is a geographic information system maintained by the California State Water Resources Control Board (SWRCB) that provides online access to environmental data at the Internet address (URL) = <http://geotracker.waterboards.ca.gov/>.

No hazardous sites were found on the Property or on adjacent properties. The EnviroStor database and GeoTracker database did not report contamination cases or hazardous material usage on the Parcel. The nearest contamination case is over 500 feet to the northeast, named the Great Western Mine [cleanup status = inactive]. EnviroStor describes the site as follows:

"The Great Western Mine is a former mercury mine situated in the southern portion of the Mayacmas Mountains. The site lies approximately 4 miles to the southwest of the town of Middletown in Lake County. Due to past mining practices, heavy metal contamination and acid mine drainage are of concern regarding the site. The nearest water body, Hoodoo Creek, is approximately 250 yards to the northeast and is located within the Putah Creek Watershed."



Screen capture of EnviroStor database query.

13.3.1. Hazard Analysis

This Hazard Analysis analyzes only the cultivation, harvesting, and processing (drying, curing, trimming, grading) of Cannabis. A Cannabis manufacturer makes or packages a prepared cannabis product (edibles, topicals, tinctures, extracts, vape cartridges, capsules and more). If Cannabis is manufactured at this facility, this Hazard Analysis will be expanded and revised.

Potential Biological Hazards

For unprocessed Cannabis, the primary biological hazard is microbiological, and specifically, fungal growth. In rare instances, some Cannabis crops can be contaminated with fecal coliforms that derive from soils or improper hygiene. Insects and arachnids, such as mites, could also be present on Cannabis product. For cultivation staff, the biological hazards are primarily snake bites, insect and arachnid stings bites, and weather exposure.

Potential Chemical Hazards

For unprocessed Cannabis, the primary chemical hazards are chemical residues: fertilizers; insecticides; and fungicides. Petroleum product usage could also lead to contamination of Cannabis product or soil. For cultivation staff, the chemical hazards are exposure to hazardous or toxic chemicals or to irritants.

Potential Physical Hazards

For unprocessed Cannabis product, physical hazards include the introduction of material fragments such as stone, glass, metal fragments, or hair. Such contamination could occur from a variety of sources, such as fugitive dust, dirty containers during transport, etc. For cultivation staff, the physical hazards are cuts or punctures by sharp objects, crushing by falling objects, weather exposure, and structure fires or wildfire.

13.3.2. Hazard Evaluation

Evaluation of Biological Hazards

Arthropod infestations (such as mites, aphids, or whiteflies) and fungal growths are common hazards. Arthropod infestations and fungal vectors and fungal growth will be controlled in various ways. Regular testing for fungal spores on raw product should be conducted. If a biological contaminant is found, the incident should be investigated to determine the source. Areas inside cultivation compounds can be graveled or paved to suppress dust and mud. Live traps may be deployed to remove rodents from operational areas. Disposable coveralls (e.g. Tyvek) can be used to increase sanitation levels and reduce vectoring of mites and other pests. A clothing changing station / mudroom can be provided for employees so that street clothing is separated from cultivation clothing. The number of workers and visitors should be minimized, as mites can travel on clothes. Increasing ventilation, such as the addition of fans, can lower humidity levels and discourage fungal growth.

To reduce the risk of snake bites and insect stings, staff will be required to wear personal protective equipment, such as boots, gloves, and pants. Insect repellants should be employed.

Care and caution should be taken when reaching in to dark spaces or lifting materials that provide refuge for animals.

Evaluation of Potential Chemical Hazards

Chemical contamination of raw product is possible, but unlikely. Regular testing for chemical residues on raw product should be performed. Chemical contamination can be reduced by implementation of Best Management Practices, which are identified in other subsections of this Plan. The use of organic-certified chemicals will also reduce this hazard significantly.

For cultivation staff, the risk of chemical exposure can be reduced by the use of personal protective equipment and the implementation of Best Management Practices, which are identified in other subsections of this Plan.

Evaluation of Potential Physical Hazards

For unprocessed Cannabis product, contamination of raw product by physical residues is relatively common, but easy to avoid. Facilities should be kept as clean as possible. Disposable coveralls (e.g. Tyvek) can be used to increase sanitation levels. Plastic sheeting can be used when raw product must be handled or stored. Equipment, such as scissors and saws, will be sanitized with ethanol.

To reduce the risk of weather exposure, staff should be provided with plenty of drinking water and shade refuges. For fire hazards, staff should be trained in fire prevention and fire safety. Fire extinguishers should be placed in strategic places and checked regularly for proper function. Staff should have access to news and communication sources so that any emergency broadcasts or evacuation notices can be received in a timely manner.

13.4. Hazardous Waste Management Plan

Cannabis cultivation operations may involve the use of hazardous materials, such as fuel for power equipment and generators, and pesticides. Transport, storage, and use of these materials could endanger human health and the environment in the event that upset or accident conditions cause a release of the materials. Numerous existing laws and regulations are designed to prevent spills of hazardous materials and limit damage in the event that such materials are released. The CalCannabis Licensing Program would only authorize lawful cultivation activities that comply with existing laws regarding storage and use of hazardous materials. California Health and Safety Code provisions and the CalARP program would require any cannabis cultivation facility storing more than a threshold quantity of regulated substances to prepare a Hazardous Materials Business Plan. These plans would include emergency response procedures to coordinate response in the event of a release and chemical accident prevention measures. With adherence to existing hazardous materials laws, the risk of accidental releases of hazardous materials from cultivation activities that could cause substantial hazards is considered low.

In addition, the CalCannabis Licensing Program's environmental protection measures (Sections 8301[a][4], 8302[a][5], and 8313 of the proposed regulations, as provided in Appendix A) would minimize potential accidental releases of hazardous materials by requiring licensees to store chemicals in a secure building or shed, and to contain any chemical leaks and immediately clean up any spills. Therefore, the risk of accidental releases of hazardous materials from lawful

cannabis cultivation operations would be lower than many other ongoing activities in the State, including existing unpermitted cannabis cultivation activities.

The Lake County Division of Environmental Health is the Certified Unified Program Agency (CUPA) for all of Lake County, dealing with hazardous waste and hazardous materials. The CUPA typically requires a Hazardous Materials Business Plan for the following volumes of hazardous materials: greater than 55 gallons of liquid; 200 standard cubic feet of compressed gas; or 500 pounds of a solid. All permittees shall manage all waste that is hazardous waste, as defined in Section 40141 of Public Resources Code, in compliance with all applicable hazardous-waste statutes and regulations.

However, the Cannabis Ordinance 3084 limits use of hazardous materials to volumes less than the State threshold: 55 gallons of a liquid; 500 pounds of a solid; or 200 cubic feet of a gas. Ordinance 3084 also prohibits the generation of hazardous waste as part of the Cannabis cultivation process.

Chemicals will be stored in a stormproof shed or Conex container so that stormwater is not contaminated. Chemicals will be properly labeled, properly segregated, and open containers sealed when not in use. Staff, when handling chemicals, will use personal protective equipment such as safety glasses, gloves, dust mask, boots, and pants and long-sleeved shirt.

Chemicals pertaining to cultivation will be stored in a stormproof shed or Conex container. Chemicals pertaining to curing will be stored in a future curing shed. Chemicals will be properly labeled and open containers sealed when stored. Personal protective equipment such as safety glasses, gloves, dust mask, boots, and pants and long-sleeved shirt, will be used by staff when handling chemicals.

Gasoline in 1 or 5-gallon containers is used to fuel small engines such as an electrical generator, quad ATV, tillers and line trimmers. No significant quantities of petroleum products are currently used, with the exception of an above ground diesel tank used to fuel two diesel pumps that are part of the vineyard operation. All large equipment maintenance operations should typically occur at service stations outside of the Project Area. Should vehicle and equipment fueling or maintenance be performed in the Project Area, the following CASQA Industrial BMP fact sheets will be followed:

- SC-20: Vehicle and Equipment Fueling
- SC-21: Vehicle and Equipment Cleaning
- SC-22: Vehicle and Equipment Maintenance and Repair

Material Safety Data Sheets (MSDS) will be kept on file for each chemical used at this facility. MSDS sheets will be made available to all staff for viewing. When a new chemical is brought on to this facility, there should be a brief “tailgate” meeting to discuss proper storage, handling, and disposal of the chemical. MSDS for the facility are provided in the Appendix.

The CDFA CalCannabis Program concluded:

“With adherence to existing hazardous materials laws, the risk of accidental releases of hazardous materials from cultivation activities that could cause substantial hazards is considered low. In general, cannabis cultivation would not make intensive use of hazardous materials. In addition, the Proposed Program’s environmental protection

measures (Sections 8301[a][4], 8302[a][5], and 8313 of the proposed regulations, as provided in Appendix A) would minimize potential accidental releases of hazardous materials by requiring licensees to store chemicals in a secure building or shed, and to contain any chemical leaks and immediately clean up any spills. Therefore, the risk of accidental releases of hazardous materials from lawful cannabis cultivation operations would be lower than many other ongoing activities in the state, including existing unpermitted cannabis cultivation activities.” (CDFA 2017)

“Cannabis cultivation sites may be located in areas of high risk for wildfire.” (CDFA 2017)

A sandbag barrier (Construction BMP Factsheet SE-8) can be placed around waste storage areas to prevent stormwater run-on from adjacent upstream areas. Sheds or shipping containers should be used to store hand tools, small parts, and most cultivation materials that can be carried by hand. Very large items can be stored in the open in the general storage areas. Such materials should be elevated with pallets or cement blocks to minimize contact with stormwater. Spill clean-up materials, material safety data sheets, a material inventory, and emergency contact numbers should be maintained and stored in the residence or shipping container.

To reduce or eliminate pollution of storm water from stockpiles of soil and cultivation materials, stockpiles will be surrounded with sediment controls (Construction BMP Factsheets SE-5: Fiber Rolls, SE-8: Sandbag Barrier, and WM-3 Stockpile Management) as needed. Plastic covers can be used, as needed, before rain events or before strong winds begin.

BMPs will be implemented to minimize storm water contact with waste materials and prevent waste discharges (Construction BMP Factsheet WM-5 Solid Waste Management). Solid waste should be removed and disposed off-site at least weekly at a proper receiving facility. Any chemicals will be stored in the shipping containers or sheds. Chemical wastes will be appropriately and clearly marked in containers and segregated from other non-waste materials.

Storage of soil amendments and chemicals should employ the following CASQA Industrial BMP Fact Sheets:

- SC-31: Outdoor Liquid Container Storage
- SC-32: Outdoor Equipment Operations
- SC-33: Outdoor Storage of Raw Materials
- SC-34: Waste Handling and Disposal
- SC-40: Contaminated or Erodible Surfaces
- TC-30: Vegetated Swale
- TC-31: Vegetated Buffer Strip.

13.5. Pollution Prevention and Spill Response

A pollution prevention and spill response subplan will be implemented. Such a plan requires the following practices: good housekeeping; preventative maintenance; other BMPs; spill and leak prevention and response measures; and a monitoring program.

The following will be implemented

- Maintenance of at least 1 spill kit for petroleum hydrocarbons on site and in fuel supply trucks to include:
 - o Containment drum;
 - o Oleophilic absorbent pads; and
 - o Granular spill absorbent suitable for petroleum, brake fluid, and antifreeze;
- Daily inspection of equipment for oil and fuel leaks;
- Fueling only in the designated area; and
- Training of personnel on handling of leaks (training at tailgate safety meetings).

If there is a spill or accidental discharge in to any waterbodies, immediately notify the Office of Emergency Services so that the local health officer can decide what actions, if any, may need to be taken to protect public safety.

Any significant release or threatened release of a hazardous material requires immediate reporting by the responsible person to the Cal OES State Warning Center (800) 852-7550 and the Unified Program Agency (UPA) or 911. The UPA may designate a call to 911 as meeting the requirement to call them.

13.6. Cannabis Vegetative Material Waste Management

13.6.1. Types and Volumes of Green Waste

The CDFA CalCannabis Program describes green waste as follows:

“Green waste is generated throughout the cannabis cultivation process. Some plants fail to reach maturity, pruning generates waste, nuisance weeds must be removed, and other plant material remains unused following harvesting, processing, and preparation for a new crop to be planted. Processing, including trimming, is described in Section 3.8 below.

Some cultivators may use sugar leaves, branch stalks, or stems for various cannabis or hemp products; typically, however, after the flowers are harvested, the remainder of the cannabis plant becomes green waste. Removal of some large plants, particularly in outdoor cultivation operations, may require a chainsaw due to the strength and thickness of the plant’s stem. Green waste is generally not piled and stored near active cannabis crops to avoid botrytis or other fungal pest issues that may occur on the waste and spread to the living cannabis plants. Disposal of green waste would follow procedures established by the Proposed Program. On-site composting is an option. If off-site disposal is used, the cultivator would make all cannabis waste unusable and unrecognizable before it leaves the licensed premises by grinding and mixing the green waste with non-consumable solid wastes such that the resulting mixture is at least 50 percent non-cannabis waste. Under Section 8305, Cannabis Waste Management, of the Proposed Program regulations, acceptable types of non-cannabis waste are any nonhazardous compostable materials, as defined in Title 14 of the California Code of Regulations at Section 17852(a)(11). After the waste is ground and mixed, licensees may dispose of it at a manned and permitted solid waste landfill, compostable materials handling facility, or in-vessel digestion facility as described in the regulations.” (CDFA 2017)

Sources of green waste on this cultivation operation consist of the following:

- mulch, humus, etc.

- landscape maintenance: lawn and weed trimmings, treated lumber, wood fencing, etc.
- Cannabis processing waste: leaves, stems, and root balls that remain after flower harvest, trimming, and grooming; whole dead plants; etc.

Volume of green waste generated by this cultivation operation is estimated at:

- two cubic yards per month per acre, or 24 cubic yards per year per acre.

Cannabis green waste should be weighed daily, weekly, or as needed, and data should be recorded for reporting requirements.

13.6.2. Handling and Disposal of Green Waste

There will be a dedicated area in the cultivation compound where Cannabis waste is handled. This area will be surveilled by video camera, and Cannabis waste will be weighed at regular intervals as part of the Track and Trace Program. Cannabis waste will be handled with appropriate personal protective equipment, including long-sleeved shirts, pants, boots, dust mask, eye protection, and gloves. Cannabis waste will either be composted onsite or disposed at a licensed landfill offsite after rendering it unconsumable.

Non-cannabis green waste can be shredded in a wood chipper, as necessary. Green waste can be mixed with soil and inoculated with humus. Compost heaps should be at least one cubic yard in size to generate and sustain necessary heat for composting (to sustain aerobic digestion). Compost heaps should be segregated into batches as they age, with humus being the resulting product after several weeks of composting. Compost heaps should be turned often to encourage aeration and aerobic digestion and supplemental water added to keep the heaps moist, but not wet (to discourage anaerobic digestion). Cannabis waste should be shredded and mixed with at least an equal amount of compostable materials such as food waste, yard waste, or growing medium (to render the cannabis unconsumable). Cannabis waste must be kept inside the locked fence or other locked compound at all times.

If cannabis waste is to be disposed offsite, it should first be shredded and blended with an equal part of non-consumable material, such as cardboard. Cannabis waste must be kept inside the locked garden area or other locked compound until ready for transport. It would then be transported as solid waste to the proper disposal facility (see Solid Waste Management Plan).

California Department of Food and Agriculture's CalCannabis Cultivation Licensing Program dictates specific Cannabis waste management practices, that will be adopted, as applicable, by this cultivation operation. The following draft regulations from the CalCannabis Cultivation Licensing Program are quoted as follows, and incorporated by reference:

§ 8305. Cannabis Waste Management

(a) For the purposes of this Chapter, "cannabis waste" is waste that is not hazardous waste as defined in Section 40141 of Public Resources Code, and is solid waste, as defined in Section 40191 of Public Resources Code, that contains cannabis and that has been made unusable and unrecognizable in the manner prescribed in subsection (e). A licensee may not sell cannabis waste.

(b) A licensee shall manage all waste that is hazardous waste, as defined in Section 40141 of Public Resources Code, in compliance with all applicable hazardous-waste statutes and regulations.

(c) A licensee shall dispose of cannabis waste as identified in the licensee's Cultivation Plan approved by the Department. A licensee shall not dispose of cannabis waste in an unsecured waste receptacle, whether in the control of the licensee or not.

(d) Cannabis that a licensee intends to render into cannabis waste shall be held in the designated holding area for a minimum of 72 hours. A licensee shall affix to each batch one or more documents with batch information and weight. At no time during the 72-hour hold period may the cannabis be handled, moved, or rendered into cannabis waste. The cannabis the licensee intends to render into cannabis waste is subject to inspection by the Department.

(e) A licensee shall make cannabis into cannabis waste by rendering the cannabis unusable and unrecognizable. The licensee shall render the cannabis into cannabis waste before removing the cannabis waste from the licensed premises. A licensee shall render the cannabis into cannabis waste by grinding and incorporating the cannabis with other ground material so that the resulting mixture is at least 50 percent noncannabis material by volume. A licensee shall render cannabis into cannabis waste and track that waste by batch.

(f) Cannabis that a licensee wishes to deposit at a compostable materials handling facility or at an in-vessel digestion facility may be rendered cannabis waste by incorporating any nonhazardous compostable material, as defined in Title 14 of the California Code of Regulations at Section 17852 (a)(11), that a compostable materials handling facility or in-vessel digestion facility may lawfully accept.

(g) Unless a licensee will compost onsite, after a licensee renders the cannabis into cannabis waste, a licensee shall do one of the following with the cannabis waste:

- (1) Dispose of the cannabis waste at a manned and fully permitted solid waste landfill;
- (2) Deposit the cannabis waste at a manned solid waste operation or a manned fully permitted compostable materials handling facility; or
- (3) Deposit the cannabis waste at a manned solid waste operation or a manned fully permitted in-vessel digestion facility.

(h) In addition to all other tracking requirements set forth in Sections 8404 and 8405 of this Chapter, a licensee shall use the track-and-trace system and onsite documents to ensure the cannabis waste materials are identified, weighed, and tracked while on the licensed premises and when disposed of or deposited in accordance with subsection (g).

(i) A licensee shall enter the date and time that the cannabis was rendered cannabis waste and the weight of the resulting cannabis waste into the track-and-trace database.

(j) A licensee shall maintain accurate and comprehensive records regarding cannabis waste material that account for, reconcile, and evidence all activity related to the generation and disposal or disposition of cannabis waste. A licensee shall obtain a record from the solid waste facility evidencing the acceptance of the cannabis waste material at the facility. The record shall contain the name and address of the facility, the date, and the volume or weight of the cannabis waste accepted. These documents are records subject to inspection by the Department and shall be kept in compliance with Section 8400 of this Chapter.

(k) A licensee shall enter the date and time of the disposal or deposit of the cannabis waste at a solid waste facility, compostable materials handling facility, or an in-vessel digestion facility into the track-and-trace system.

13.7. Growing Medium Management

The CDFA CalCannabis Program describes soils handling as follows:

"Soils used in cannabis cultivation may be treated, reused, stockpiled, and/or discarded. For reuse, soils are piled and covered with tarps for an extended period (months to a year) to allow heat from sunlight to destroy any potential soil pathogens or pests. Another practice for soil reuse is to run a compost tea through the soils between harvests to restore soil nutrients. Although it is not a direct component of the Proposed Program, another aspect of soil reuse can include

laboratory testing of soil samples to identify nutrient deficiencies or other issues. Identifying such deficiencies allows the soil to be properly treated or amended with fertilizers or other soil amendments, thereby correcting these deficiencies, prior to being reused with a new cannabis crop.” (CDFA 2017)

“Outdoor cultivation typically involves planting rooted cannabis cuttings or seeds in the early spring and harvesting the plants in the fall (mid-September through November), after the plants flower. Soils used in the pots or grow bags are typically amended to ensure that nutrients are available to the plants throughout the growing season. Compost teas, which are created by steeping compost material in water, may also be used to fulfill nutrient needs (Ingham 2014). Water and nutrient supplement needs for outdoor cultivation may vary depending on the type of growing container selected. For example, raised beds typically require more watering and additional liquid nutrient application compared to other growing container options.” (CDFA 2017)

For the purposes of this Plan, growing medium consists of soil and non-organic amendments (vermiculite, perlite, silica gel, etc.). It does not include fertilizers or organic amendments such as mulch, humus, worm castings, etc. See the Fertilizer subsection of this Plan for a discussion of organic amendments.

13.7.1. Types and Volumes of Growing Medium

A growing medium or grow medium is the matrix that the Cannabis plant is cultivated in. The three main types of grow mediums for Cannabis plants are soil mixes, soil-less mixes, and hydroponics. The types differ in how nutrients, oxygen, and water are delivered to the plant, and how the roots are anchored.

Soil mixes combine soil with amendments, such as peat, humus (compost), worm castings, and perlite. Soil mixes naturally contain some nutrients, which means it will provide the nutrients Cannabis plants need for at least the first few weeks of life; supplemental fertilizer may be needed. Soil-less growing medium is composed of inert (non-living soil) ingredients like coco coir, perlite, peat moss, rockwool, or vermiculite. Because there are no nutrients in these inert substances, all nutrients must be delivered by irrigation. Hydroponics growing mediums use containers to suspend the roots over a water bath. Nutrients are introduced into the bath.

The growing medium for this cultivation operation will be native soil amended with imported organics. Exact volumes are not known at this time.

13.7.2. Growing Medium Handling, Disposal, and Waste Reduction

Growing media waste can be reduced or eliminated by composting and blending old soils with new soils and amendments. No significant amounts of growing media are expected to be disposed. Instead, media is reduced in volume yearly because it is absorbed by the plants and metabolized by soil organisms (bacteria, fungi, invertebrates). Soil staging areas and compost piles will be located near each cultivation site. Cannabis green waste must be stored inside a secure area. BMPs will be employed to ensure that these piles do not contaminate stormwater or cause nuisance dust or odor issues.

13.8. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

14.0 WATER RESOURCES

14.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must discuss Water Resources.

The Lake County Groundwater Management Plan, together with the Lake County Water Inventory and Analysis (CDM 2006) and the Lake County Water Demand Forecast (CDM 2006), serve to manage the water resources in Lake County and provide a framework for the County and other water users to implement effective water resource management programs.

If implementation of the project requires the placement of fill, removal of riparian vegetation, or other alterations to channels delineated as jurisdictional waters, such alteration or degradation will require several permits. Any alteration of a channel below the ordinary high water mark requires a waiver from USACE or a Clean Water Act Section 404 permit. Avoidance and minimization measures, as well as compensatory mitigation for loss of jurisdictional waters, is required by federal and state permits to maintain the policy of “No Net Loss” of wetlands and other protected water resources. Compensatory mitigation would consist of any combination of in-lieu fee payment to a mitigation bank, stream enhancement, or land dedication, at mitigation ratios determined by USACE. Clean Water Act Section 401 Water Quality Certification would be required in conjunction with a Section 404 permit.

The placement of fill or structures in waters of the State may require a permit from the State Water Resources Control Board (Waste Discharge Requirements). Alteration of a channel or destruction of vegetation of a streambank within the limits of riparian vegetation (the Stream Zone) would require a California Fish and Game Code Section 1600 streambed alteration agreement. Clean Water Act Section 401 Water Quality Certification would be required in conjunction with these permits. Avoidance and minimization measures, as well as compensatory mitigation for loss of jurisdictional waters, are required under state permits

14.2. Description of Water Resources

14.2.3. Surface Water

Non-wetland waters were classified using the California Forest Practice Rules. The California Forest Practice Rules define a Class I watercourse as 1) a watercourse providing habitat for fish always or seasonally, and/or 2) providing a domestic water source; a Class II watercourse is 1) a watercourse capable of supporting non-fish aquatic species, or 2) a watercourse within 1000 feet of a watercourse that seasonally or always has fish present; a Class III watercourse is a watercourse with no aquatic life present and that shows evidence of being capable of transporting sediment to Class I and Class II waters during high water flow conditions.

An assessment for the presence of potentially-jurisdictional water resources within the operational areas and surrounding parcel was also conducted during the field survey by Natural Investigations Co., Inc. (2019). The following water features were detected (see Exhibits):

- St. Mary’s Creek (seasonal)
- a small potential isolated wetland

St. Mary's Creek is an intermittent channel (Class II watercourse). It is located approximately 0.47 miles to the east of the Project Area down a sloping hillside. It was not closely inspected due to inaccessibility and distance from the Project Area. The Creek is a tributary to St. Helena Creek, which drains to Putah Creek. There are multiple anadromous fish barriers downstream. Aerial imagery indicates that the canopy of tree species associated with St. Mary's Creek are the same as nearby upland habitats, so riparian habitat may be lacking. The Creek channel is likely 5-10 feet in width. A small potential isolated wetland contained emergent vegetation including rushes (*Juncus* sp.) and sedges (*Carex* sp.). No surface water was observed during the survey. It is approximately 230 feet uphill (east) of the Project Area.

The cultivation operation should not divert surface water. State permits are needed to use surface water.

14.2.4. Groundwater

According to maps in the Lake County Groundwater Management Plan, the Project Area appears to be located in:

- the Collayomi Valley Groundwater Management Plan Area.

The Cannabis cultivation operations will use water from a permitted residential well.

14.3. Water Resource Protection

This Property has no vehicle stream crossings (see Exhibits). Proper road maintenance procedures are detailed in other sections of this Plan.

This cultivation operation is enrolled as a Tier I / Low Risk cultivation operation in the State Water Resources Control Board's *Order WQ 2019-0001-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (General Order). Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices, buffer zones, sediment and erosion controls, inspections and reporting, and regulatory oversight. Note also that a sediment and erosion control plan is being implemented as part of the larger Site Management Plan.

Potential adverse impacts to water resources could occur during construction by modification or destruction of stream banks or riparian vegetation, the filling of wetlands, or by increased erosion and sedimentation in receiving water bodies due to soil disturbance. Project implementation will not directly impact any channels or wetlands. Soil disturbance from project implementation could increase erosion and sedimentation. Regulations at both the County and State levels require creation and implementation of an erosion control plan / stormwater management plan. Furthermore, if the total area of ground disturbance from project implementation is greater than 1 acre, the project proponent will need to enroll for coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 2009-0009-DWQ).

It is recommended that a formal delineation of jurisdictional waters be performed before construction work, or ground disturbance, is performed near any wetland or channel.

14.3.1. Avoidance and Minimization Measures

Zoning Setbacks and Site Selection

The County's Cannabis Ordinance requires that all cultivation operations be located at least 100 feet away from all waterbodies (i.e. spring, top of bank of any creek or seasonal stream, edge of lake, wetland or vernal pool).

Additionally, cultivators who enroll in the State Water Board's Waste Discharge Requirements for Cannabis Cultivation Order WQ 2019-0001-DWQ must comply with the Minimum Riparian Setbacks. The proposed project is compliant with the setback requirements of Cannabis Cultivation Order WQ 2019-0001-DWQ. Thus, this cultivation operation is located as far away as possible from waterbodies and in the flattest practical areas to reduce the potential for water pollution.

Vegetative Buffers

Generous vegetative buffers exist between this cultivation operation and the nearest water resource. These vegetated areas will be preserved as much as possible. The exception are any fire breaks needed for wildfire protection. Areas that are covered in grasses will be regularly mowed or trimmed. Leaf litter and trash should be removed regularly. Areas that are covered in natural habitats should not be trimmed.

14.3.2. Best Management Practices

Water resource protection BMP's were identified and discussed in the Stormwater Management subsection.

14.4. Water Quality Monitoring Program

14.4.1. Objectives

The Project Site Monitoring Program should be developed and implemented to address the following objectives:

- To demonstrate that the site is in compliance with all permits and ordinances;
- To determine whether non-visible pollutants are present at the project site and are causing or contributing to exceedances of water quality objectives;
- To determine whether immediate corrective actions, additional BMP implementation, or Plan revisions are necessary to reduce pollutants in storm water discharges and authorized non-storm water discharges; and
- To determine whether BMPs indicated in the Plan are effective in preventing or reducing pollutants in storm water discharges and authorized non-storm water discharges.

Note that water quality monitoring and sampling is also required under the State Water Board's Cannabis General Order.

14.4.2. Types of Inspections and Frequency

Based on the project site's location, construction / cultivation periods, and rainfall erosivity factor, this project should perform inspections at the following times: beginning of the rain season; before and after any storm that produces over 1 inch of rain; and during any storm that produces

a significant stormwater discharge. Each inspection event should be logged in the Inspection Log in this Plan or in a separate binder.

The inspectors should be prepared to collect samples and conduct visual inspections. Inspectors are not required to physically collect samples or conduct visual inspections under the following conditions:

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

14.4.3. Inspection and Sampling Personnel

All inspection and sampling activities should be performed by the stormwater manager until site personnel are properly trained to take over these tasks. The name(s) and contact number(s) of the assigned inspection and sampling personnel are:

- Lauren and Amy Goodman; phone 707-813-0661; email ldsgoodman@gmail.com
- the default Stormwater Management Consultant is Dr. G.O. Graening, QSD #00473, QISP #597.

14.4.4. Record Keeping and Reports

The site manager or storm water manager should retain records of all storm water monitoring information and copies of all reports for a period of at least three years. Each inspection event can be logged in the Inspection Log in a binder. These records include:

- The date, place, time of facility inspections, sampling, visual inspections, and/or measurements, including precipitation;
- The individual(s) who performed the facility inspections, sampling, visual inspections, and or measurements;
- The date and approximate time of analyses;
- The individual(s) who performed the analyses;
- Rain gauge readings from site inspections;
- Non-storm water discharge inspections and visual inspections and storm water discharge visual observation records;
- Visual observation and sample collection exception records; and
- The records of any corrective actions and follow-up activities that resulted from analytical results, visual inspections, or inspections.

14.4.5. Visual Inspection Plan

The inspector is only required to conduct visual observations (inspections) during business hours only. Within 2 business days (48 hours) prior to significant rain events, the inspector should visually observe (inspect):

- All storm water drainage areas to identify any spills, leaks, or uncontrolled pollutant sources (if needed, the site manager should implement appropriate corrective actions);
- All BMPs to identify whether they have been properly implemented in accordance with the Plan (if needed, the site manager shall implement appropriate corrective actions); and
- Any storm water storage and containment areas to detect leaks and ensure maintenance of adequate freeboard.

The inspector should conduct during-rain event visual observations (inspections) at regular intervals during extended storm events. The inspector should visually observe (inspect) storm water discharges at all discharge locations. Within two business days (48 hours) after major rain events, the inspector should conduct post rain event visual observations (inspections) to (1) identify whether BMPs were adequately designed, implemented, and effective, and (2) identify additional BMPs and revise the Plan accordingly.

For the visual inspections described above, the inspector should observe the presence or absence of floating and suspended materials, a sheen on the surface, discolorations, turbidity, odors, and source(s) of any observed pollutants. The inspector should maintain on-site records of all visual observations (inspections), personnel performing the observations, observation dates, weather conditions, locations observed, and corrective actions taken in response to the observations.

14.4.6. Sampling Plan for Pollutants

Water sampling is only required if a significant water pollution event occurs. The inspector should analyze one or more effluent samples for any parameters indicating the presence of pollutants during any breach, malfunction, leakage, or spill observed during a visual inspection which could result in the discharge of pollutants to surface waters that would not be visually detectable in storm water. Samples of discharge should be collected at the designated sampling locations shown on the WPCDs for observed breaches, malfunctions, leakages, spills, operational areas, soil amendment application areas, and historical site usage areas that triggered the sampling event.

The inspector should analyze samples for all applicable pollutant parameters. The inspector should collect a sample of storm water that has not come in contact with the disturbed soil or the materials stored or used on-site (uncontaminated sample) for comparison with the discharge sample. The inspector should compare the uncontaminated sample to the samples of discharge using field analysis or through laboratory analysis. The inspector should keep all field /or analytical data. Samples should be analyzed for the applicable constituents using the USEPA analytical methods.

14.4.7. General Sampling Methodology

The storm water manager should designate and train personnel to collect, maintain, and ship samples in accordance with the Surface Water Ambient Monitoring Program's 2008 Quality Assurance Program Plan. The storm water manager should ensure that testing laboratories will receive samples within 48 hours of the physical sampling (unless otherwise required by the laboratory), and should use only the sample containers provided by the laboratory to collect and store samples.

The storm water manager should ensure that all sampling and sample preservation are in accordance with the current edition of "Standard Methods for the Examination of Water and Wastewater" (American Public Health Association). All monitoring instruments and equipment (including a discharger's own field instruments for measuring pH and turbidity) should be calibrated and maintained in accordance with manufacturers' specifications to ensure accurate measurements. The storm water manager should ensure that all laboratory analyses are conducted according to test procedures under 40 Code of Federal Regulations Part 136, unless

other test procedures have been specified in this General Permit or by the Regional Water Board. With the exception of field analysis conducted by the inspectors for turbidity and pH, all analyses should be sent to and conducted at a laboratory certified for such analyses by the State Department of Health Services.

Sample Collection and Analysis for Monitoring Turbidity and pH

Parameter	Test Method	Minimum Sample Volume	Sample Collection Container Type	Detection Limit (minimum)
Turbidity	Field meter/probe with calibrated portable instrument	500 mL	Polypropylene or Glass (Do not collect in meter sample cells)	1 NTU
pH	Field meter/probe with calibrated portable instrument or calibrated pH test kit	100 mL	Polypropylene	0.2 pH units
Notes: NTU = Nephelometric Turbidity Unit				

An adequate stock of monitoring supplies and equipment for monitoring non-visible pollutants should be available on the project site prior to a sampling event. Monitoring supplies and equipment should be stored in a cool-temperature environment that will not come into contact with rain or direct sunlight. Sampling personnel should be available to collect samples in accordance with the sampling schedule. Supplies maintained at the project site should include, but are not limited to, surgical gloves, sample collection equipment, coolers, appropriate number and volume of sample bottles, identification labels, re-sealable storage bags, paper towels, personal rain gear, ice, Sampling Activity Log forms, and Chain of Custody (COC) forms. The storm water manager should obtain and maintain the field-testing instruments for analyzing samples in the field by trained sampling personnel.

Grab samples should be collected and preserved in accordance with the applicable test method. Only personnel trained in proper water quality sampling should collect samples. Samples should be collected by placing a separate lab-provided sample container directly into a stream of water down gradient and within close proximity to the potential non-visible pollutant discharge location. This separate lab-provided sample container should be used to collect water, which should be transferred to sample bottles for laboratory analysis. The up gradient and uncontaminated background samples should be collected first prior to collecting the down gradient to minimize cross-contamination. The sampling personnel should collect the water upgradient of where they are standing. Once the separate lab-provided sample container is filled, the water sample should be poured directly into sample bottles provided by the laboratory for the analyte(s) being monitored. To maintain sample integrity and prevent cross-contamination, sampling collection personnel should:

- Wear a clean pair of surgical gloves prior to the collection and handling of each sample at each location;
- Not contaminate the inside of the sample bottle by not allowing it to come into contact with any material other than the water sample;

- Discard sample bottles or sample lids that have been dropped onto the ground prior to sample collection;
- Not leave the cooler lid open for an extended period of time once samples are placed inside;
- Not sample near a running vehicle where exhaust fumes may impact the sample;
- Not touch the exposed end of a sampling tube, if applicable;
- Avoid allowing rainwater to drip from rain gear or other surfaces into sample bottles;
- Not eat, smoke, or drink during sample collection;
- Not sneeze or cough in the direction of an open sample bottle;
- Minimize the exposure of the samples to direct sunlight, as sunlight may cause biochemical transformation of the sample to take place;
- Decontaminate sampling equipment prior to sample collection using a laboratory-grade soapy water wash, distilled water rinse, and final rinse with distilled water; and
- Dispose of decontamination water/soaps appropriately; i.e., not discharge to the storm drain system or receiving water.

Immediately following collection, samples for field analysis will be tested in accordance with the field instrument manufacturer's instructions and results recorded on the Sampling Activity Log. Immediately following collection, sample bottles for laboratory analytical testing should be capped, labeled, documented on a COC form provided by the analytical laboratory, sealed in a re-sealable storage bag, placed in an ice-chilled cooler, at as near to 4 degrees Celsius as practicable, and delivered within 24 hours to a California state-certified laboratory.

14.5. Maps

The required maps are provided in the Maps section at the end of this Property Management Plan.

Sample Collection, Preservation, and Analysis for Monitoring Non-visible Pollutants

Constituent	Analytical Method	Minimum Sample Volume	Sample Bottle	Sample Preservation	Reporting Limit	Maximum Holding Time
VOCs-solvents	EPA 8260B	3 × 40 mL	VOA-glass	Store at 4° C, HCl to pH<2	1 µg/L	14 days
SVOCs	EPA 8270C	1 × 1 L	Glass-amber	Store at 4° C	10 µg/L	7 days
Pesticides	EPA 8081A	1 × 1 L	Glass-amber	Store at 4° C	0.1 µg/L	7 days
Herbicides	EPA 8151A	1 × 1 L	Glass-amber	Store at 4° C	Check lab	7 days
COD	EPA 410.4	1 × 250 mL	Glass-amber	Store at 4° C, H ₂ SO ₄ to pH<2	5 mg/L	28 days
TDS	EPA 160.1 (TDS)	1 × 100 mL	Polypropylene	None	ppm	Immediate
pH	EPA 150.1	1 × 100 mL	Polypropylene	None	Unitless	Immediate
Alkalinity	SM 2320B	1 × 250 mL	Polypropylene	Store at 4° C	1 mg/L	14 days
Nitrate	EPA 353.2	1 × 125 mL	Polypropylene	Store at 4° C, H ₂ SO ₄ to pH<2	Check lab	28 days
Phosphate	EPA 365.3	1 × 125 mL	Polypropylene	Store at 4° C	Check lab	28 days
Organic nitrogen	TKN – NH ₃	1 × 1 L	Glass-amber	Store at 4° C, H ₂ SO ₄ to pH<2	Check lab	28 days
TOC	EPA 415.1	1 × 250 mL	Glass	Store at 4° C, H ₂ SO ₄ to pH<2	Check lab	28 days
Potassium	EPA 200.7	1 × 250 mL	Polypropylene	Store at 4° C, HNO ₃ to pH<2	0.1 mg/L	6 months
Phenols	EPA 8270C	1 × 1 L	Glass-amber	Store at 4° C	Check lab	7 days
Metals (Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Mo, Ni, Se, Na, Th, Va, Zn)	EPA 6010B/7470A	1 × 250 mL	Polypropylene	Store at 4° C, HNO ₃ to pH<2	0.1 mg/L	6 months
Metals (chromium VI)	EPA 7199	1 × 500 mL	Polypropylene	Store at 4° C	1 µg/L	24 hours

Notes:

°C = degree(s) Celsius

µg/L = microgram(s) per Liter

COD = chemical oxygen demand

DO = dissolved oxygen

EPA = U.S. Environmental Protection Agency

HCl = hydrogen chloride

H₂SO₄ = hydrogen sulfide

HNO₃ = nitric acid

L = liter

mg/L = milligrams per liter

mL = milliliter(s)

ppm = parts per million

PCB = polychlorinated biphenyl

SVOC = semi-volatile organic compound

TDS = total dissolved solids

VOA = volatile organic analysis

VOC = volatile organic compound

15.0 WATER USE

15.1. Requirements / Goals

According to the Ordinance, the Property Management Plan must have a section on Water Use:

- (a) Intent: To conserve the County's water resources by minimizing the use of water.*
- (b) All permitted activities shall have a legal water source on the premises, and have all local, state, and federal permits required to utilize the water source. If the permitted activity utilizes a shared source of water from another site, such source shall be a legal source, have all local, state, and federal permit required to utilize the water source, and have a written agreement between the owner of the site where the source is located and the permitted activity agreeing to the use of the water source and all terms and conditions of that use.*
- (c) Permittee shall not engage in unlawful or unpermitted drawing of surface water.*
- (d) The use of water provided by a public water supply, unlawful water diversions, transported by a water hauler, bottled water, a water-vending machine, or a retail water facility is prohibited.*
- (e) Where a well is used, the well must be located on the premises or an adjacent parcel. The production well shall have a meter to measure the amount of water pumped. The production wells shall have continuous water level monitors. The methodology of the monitoring program shall be described. A monitoring well of equal depth within the cone of influence of the production well may be substituted for the water level monitoring of the production well. The monitoring wells shall be constructed and monitoring begun at least three months prior to the use of the supply well. An applicant shall maintain a record of all data collected and shall provide a report of the data collected to the County annually.*
- (f) Water may be supplied by a licensed retail water supplier, as defined in Section 13575 of the Water Code, on an emergency basis. The application shall notify the Department within 7 days of the emergency and provide the following information:*
 - a. A description of the emergency.*
 - b. Identification of the retail water supplier including license number.*
 - c. The volume of water supplied.*
 - d. Actions taken to prevent the emergency in the future.*
- (g) All permittees shall prepare a Water Use Management Plan to be approved by the Lake County Water Resources Department. Said plan shall:*
 - a. Identify the source of water, including location, capacity, and documentation that it is a legal source.*
 - b. Described the proposed irrigation system and methodology.*
 - c. Describe the amount of water projected to be used on a monthly basis for irrigation and separately for all other uses of water and the amount of water to be withdrawn from each source of water on a monthly basis.*

15.2. Water Use Management Plan

15.2.1. Water Sources and Metering

The Property does/does not have municipal water service. The Cannabis cultivation operations will use water from an existing, residential groundwater well (see Maps). This well is permitted with the county and uses an electric pump. The capacity of this well is ____ gallons per minute.

The cultivation site should not take water directly from any watercourse. State permits are needed to divert surface water. Note that water may be supplied by a licensed retail water supplier, as defined in Section 13575 of the Water Code, on an emergency basis. The cultivator shall notify the Department within 7 days of the emergency and provide the following information: a description of the emergency; identification of the retail water supplier including license number; the volume of water supplied; and actions taken to prevent the emergency in the future.

A water meter will be installed for the cultivation site; water consumption will be logged daily. A water budget will be created every year and water use efficiency will be analyzed for the previous year.

15.2.2. Estimated Water Use

Water use requirements for outdoor cannabis production are similar to water use requirements for other agricultural crops such as corn (CDFA 2017). CDFA (2017) reports the following regarding the water use for cannabis:

“According to Hammon et al. (2015), water use requirements for outdoor cannabis production (25-35 inches per year) are generally in line with water use for other agricultural crops, such as corn (20-25 inches per year), alfalfa (30-40 inches per year), tomatoes (15-25 inches per year), peaches (30-40 inches per year), and hops (20-30 inches per year). Lindsey (2012) similarly cites a University of California researcher who suggested that cannabis does well under irrigation management and, as a small-acreage crop, will use far less water than crops such as cotton. Estimates of daily water usage per cannabis plant range from 5 gallons (Live Science 2014) to 6-8 gallons (CDFW 2016).”

CDFA (2017) concludes the following regarding groundwater impacts from small cultivation operations:

“Based on the relatively low quantities of water use (from 0.002 to 1.8 acre-feet per year), the likelihood that an individual cultivator or group of cultivators using groundwater from a defined alluvial aquifer would, by themselves, cause substantial groundwater overdraft is considered unlikely, for several reasons. First, groundwater overdraft is typically caused by the combination of various uses in a basin and is not typically attributable to a particular user or set of users; in other words, it is typically a cumulative issue (which is discussed in more detail in Chapter 6, Cumulative Considerations). In addition, the size limitations for cultivation sites under the Proposed Program would limit the maximum extent of water use. For instance, the highest estimate, provided by Hammon et al. (2015), would result in less than 3 acre-feet of annual usage at the largest allowable cultivation site of 1 acre. Finally, no information is available to suggest that there would be high concentrations of cultivators using groundwater from an alluvial basin in a particular location in a manner that could substantially affect neighboring wells.” (pages 4.8-34 to 4.8-35)

Daily Water Consumption

The following estimates were used from the CalCannabis Environmental Impact Report (CDFA 2017):

- 500 Cannabis plants per acre, each requiring 6 gallons per day = 3,000 gallons per day for an acre of Cannabis canopy

This is equivalent to 2.1 gallons per minute for an acre of Cannabis canopy. The proposed project is 0.5 acres of Cannabis canopy. Thus, the daily requirement is 1 gallon per minute for 0.5 acres of Cannabis canopy. The yield of the well on the Property is ___gallons per minute. Thus, there is more than sufficient water supply on this Property to support the proposed Cannabis cultivation.

Annual Water Consumption

Using the assumptions of 3,000 gallons per day for 1 acre of Cannabis canopy, and 120 growing days, the estimated annual water demand is estimated at 360,000 gallons per acre per year (= 1 acre foot per year). This is consistent with the range of values reported in the CalCannabis Environmental Impact Report = from 0.002 to 1.8 acre-feet per year.

15.2.3. Water Conservation

Water conservation practices will be implemented, including some combination of the following strategies and actions:

- selection of plant varieties that are suitable for the climate of the region
- the use of driplines and drip emitters (instead of spray irrigation)
- mulching to reduce evaporation
- water application rates modified from data from soil moisture meters and weather monitoring
- rooftop water collection (where feasible and permitted)
- shutoff valves on hoses and water pipes
- daily visual inspections of irrigation systems
- immediate repair of leaking or malfunctioning equipment
- water metering and budgeting

CASQA Construction BMP Fact Sheet NS-1: Water Conservation Practices should be implemented to prevent discharges from water supply equipment. Water application rates should be minimized as necessary to prevent runoff and ponding and water equipment leaks should be repaired immediately. Implement Construction BMP Fact Sheet NS-7: Potable Water / Irrigation to manage the potential pollutants generate during discharges from irrigation lines and unplanned discharges from water sources.

15.2.4. Irrigation System

At the cultivation site, the water supply will fill a plastic storage tank; a water meter will meter the water use. Water filtration systems may also be installed. This tank will supply gravitational head to the irrigation system. PVC pipes will deliver the water to the planting stations. Mixing tanks (plastic IBC tote, 275 gallon) will be used for making compost tea (liquid soil amendments or fertilizers), and spliced into these supply lines. At each planting station, black polyvinyl flexible tubes and drip emitters will be used to irrigate the plants.

16.0 MONITORING AND REPORTING FOR COUNTY LICENSING

16.1. Requirements / Goals

According to the Ordinance, the licensee must perform annual compliance monitoring and prepare annual reports as follows:

6. Compliance Monitoring

- i. A compliance monitoring inspection of the cultivation site shall be conducted annually during growing season.
- ii. The permittee shall pay a compliance monitoring fee established by resolution of the Board of Supervisors prior to the inspection.
- iii. If there are no violations of the permit or state license during the first five years, the inspection frequency may be reduced by the Director to not less than once every five years.

7. Annual Reports

i. Performance Review

(a) All cannabis permittees shall submit a "Performance Review Report" on an annual basis from their initial date of operation for review and approval by the Planning Commission. The Planning Commission may delegate review of the annual Performance Review Report to the Director at the time of the initial hearing or at any time thereafter. This annual "Performance Review Report" is intended to identify the effectiveness of the approved development permit, use permit, Operations Manual, Operating Standards, and conditions of approval, as well as the identification and implementation of additional procedures as deemed necessary. In the event the Planning Commission identifies problems with specific Performance Review Report that could potentially lead to revocation of the associated development or use permit, the Planning Commission may require the submittal of more frequent "Performance Review Reports."

(b) Pursuant to sub-section 6.i. above, the premises shall be inspected by the Department on an annual basis, or less frequently if approved by the Director. A copy of the results from this inspection shall be given to the permittee for inclusion in their "Performance Review Report" to the Department.

(c) Compliance monitoring fees pursuant to the County's adopted master fee schedule shall be paid by permittee and accompany the "Performance Review Report" for costs associated with the inspection and the review of the report by County staff.

(d) Non-compliance by permittee in allowing the inspection by the Department, or refusal to pay the required fees, or noncompliance in submitting the annual "Performance Review Report" for review by the Planning Commission shall be deemed grounds for a revocation of the development permit or use permit and subject the holder of the permit(s) to the penalties outlined in this Code.

Also, the Cannabis General Order has annual monitoring and reporting requirements as follows (Order WQ 2019-0001-DWQ, Attachment B: Monitoring And Reporting Program):

A. Annual Report

Annual Reports shall be submitted to the Regional Water Board by March 1 following the year being monitored. For example, the monitoring report for activities conducted in the year 2018 is due on March 1, 2019. The Annual Report shall include the following:

1. Facility Status, Site Maintenance Status, and Storm Water Runoff Monitoring.
2. The name and contact information for the person responsible for operation, maintenance, and monitoring.

A letter transmitting the annual report shall accompany each report. The letter shall summarize the numbers and severity of violations found during the reporting period, and actions taken or planned to correct the

violations and prevent future violations. The transmittal letter shall contain the penalty of perjury statement and shall be signed by the Discharger or the Discharger's authorized agent.

17.0 LITERATURE CITED AND FURTHER READING

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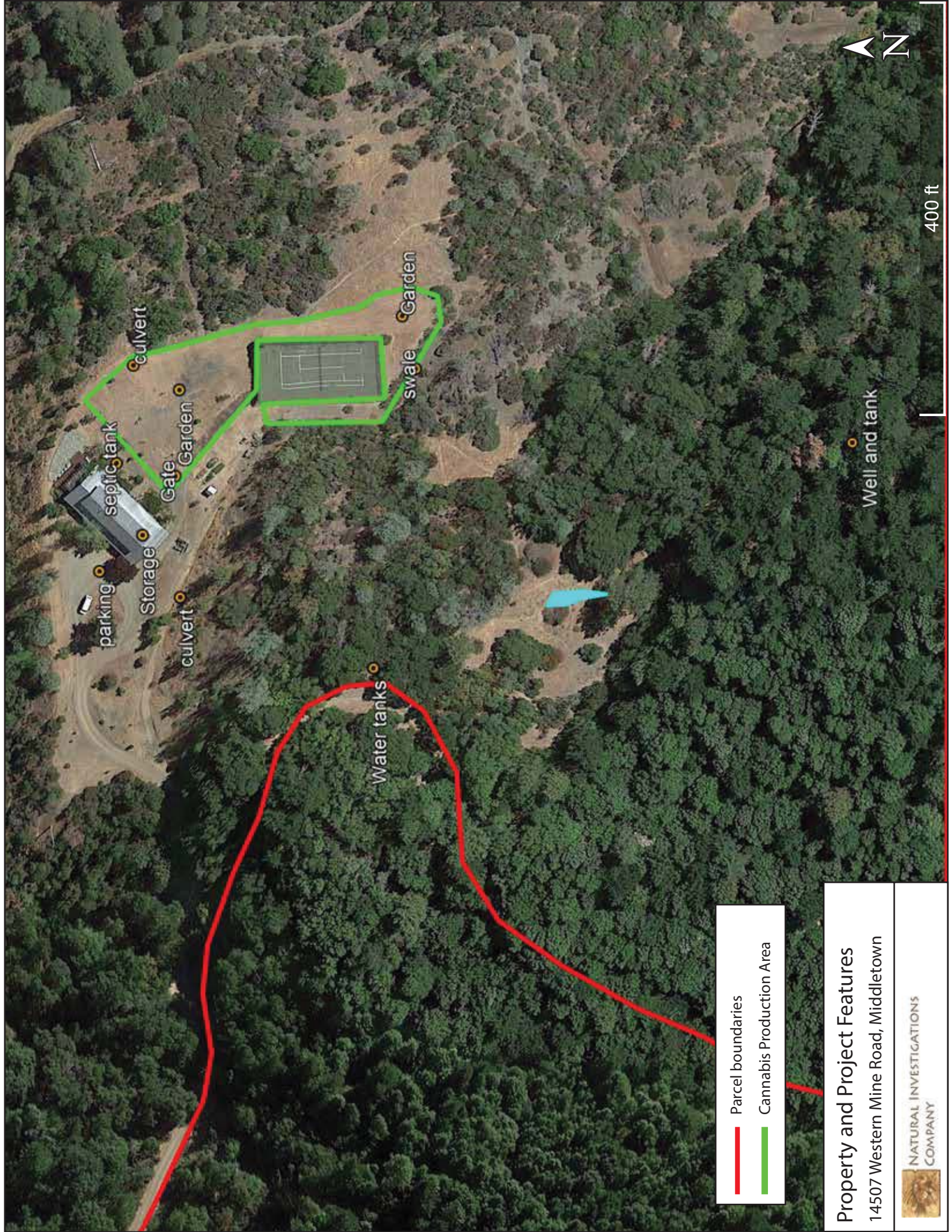
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<http://www.pacificwatershed.com/sites/default/files/RoadsEnglishBOOKapril2015b.pdf>

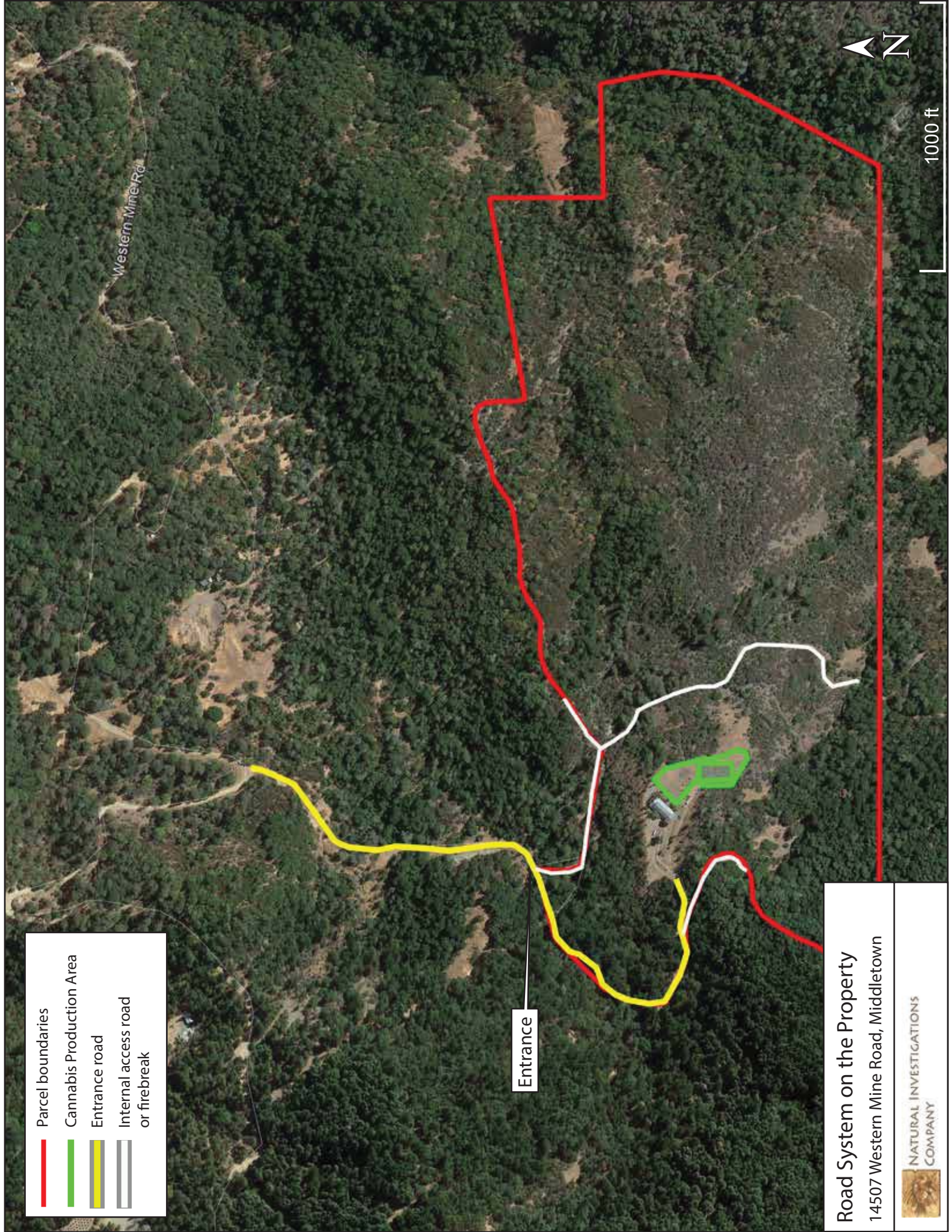
USEPA NPDES Storm Water Program's National Menu of BMP's website at <https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#edu>

18.0 MAPS AND EXHIBITS



- Parcel boundaries
- Cannabis Production Area

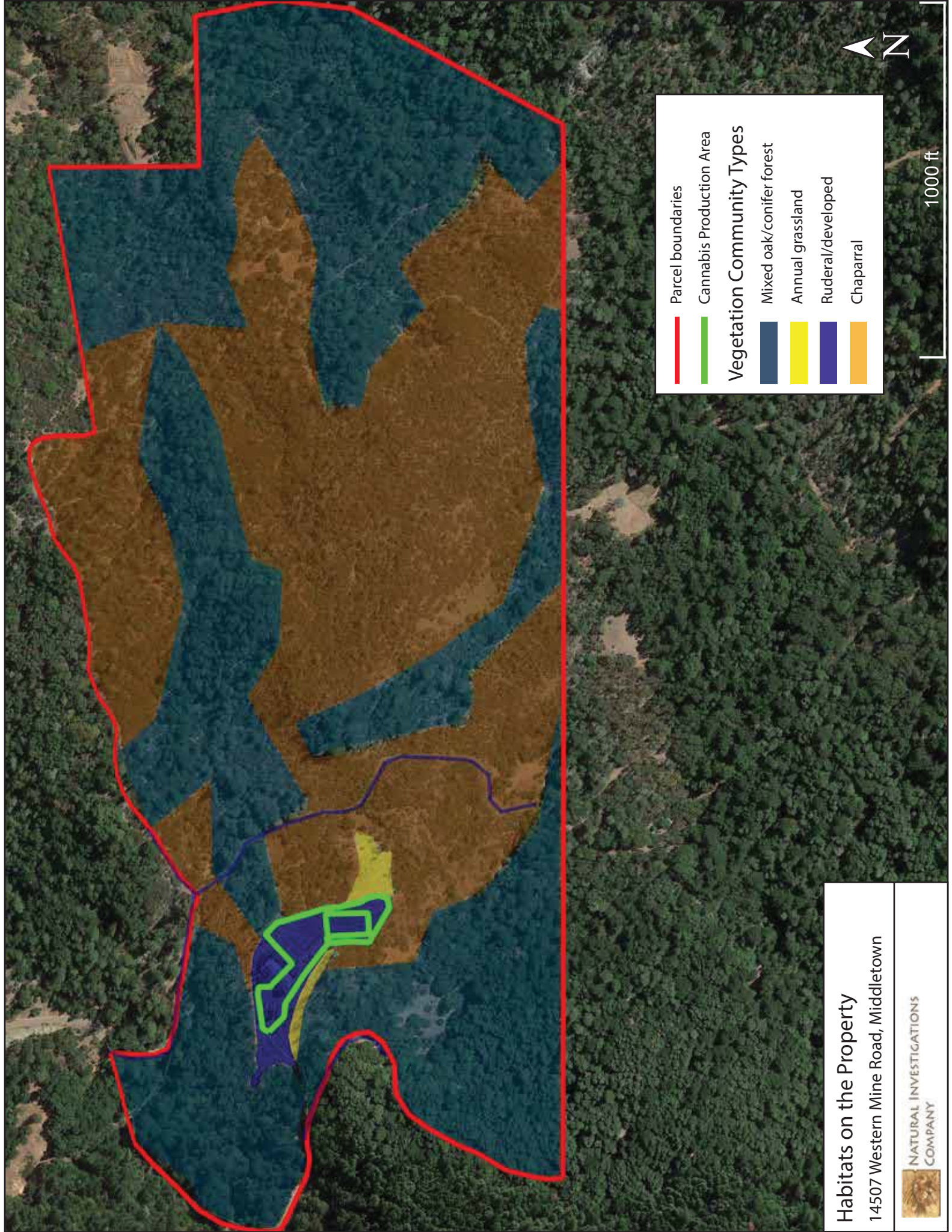
Property and Project Features
14507 Western Mine Road, Middletown



	Parcel boundaries
	Cannabis Production Area
	Entrance road
	Internal access road or firebreak

Entrance

Road System on the Property	
14507 Western Mine Road, Middletown	
	NATURAL INVESTIGATIONS COMPANY



Parcel boundaries

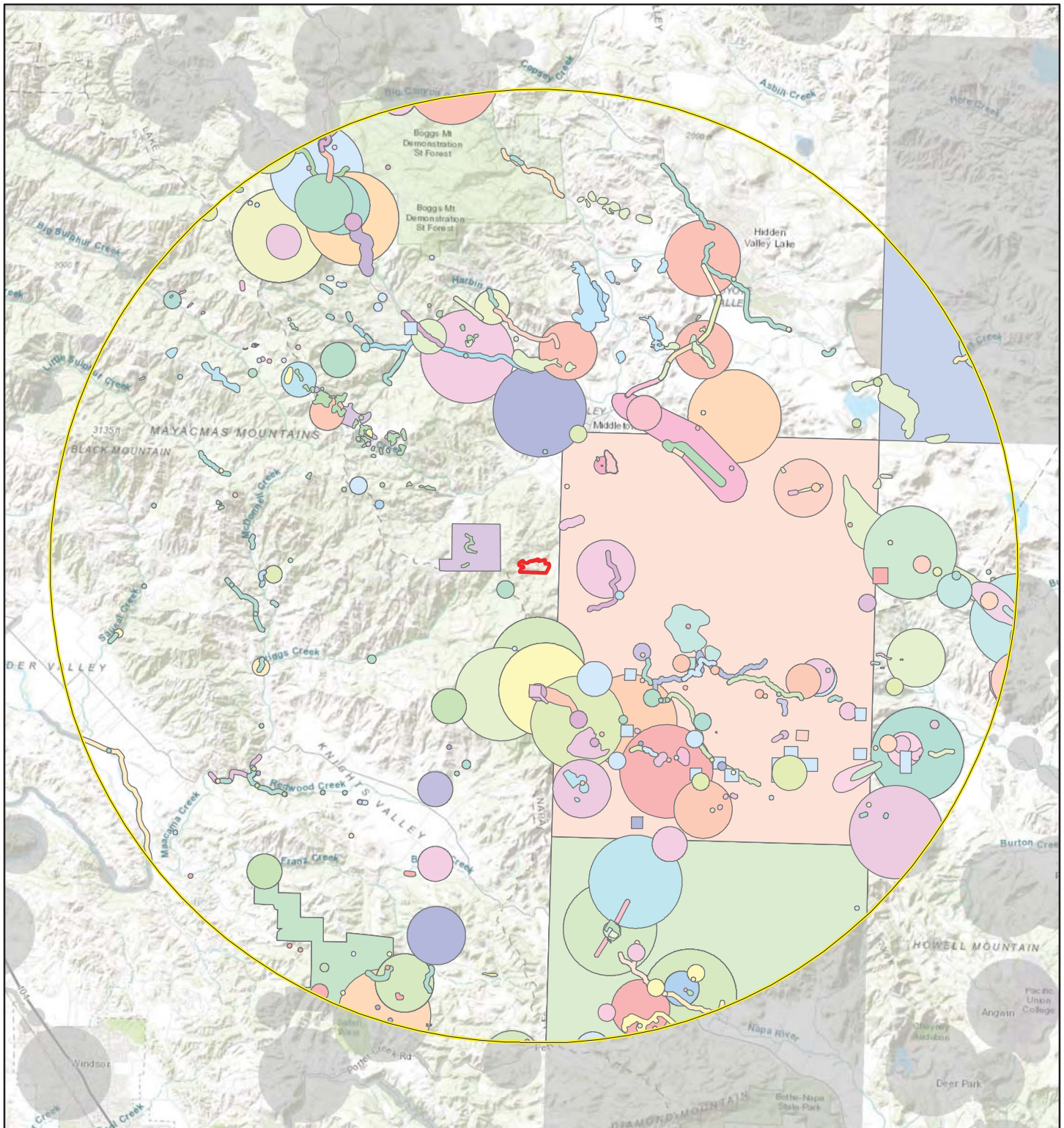
Cannabis Production Area

Vegetation Community Types

- Mixed oak/conifer forest
- Annual grassland
- Ruderal/developed
- Chaparral

Habitats on the Property
14507 Western Mine Road, Middletown

 NATURAL INVESTIGATIONS
COMPANY



Project Location 10 Mile Buffer

1:190,000 1 inch = 3 miles
 0 3 6
 Miles



Notes:

1. The locations of all features shown are approximate.
 2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. Natural Investigations Company can not guarantee the accuracy and content of electronic files. The master file is stored by Natural Investigations Company and will serve as the official record of this communication.
 3. It is unlawful to copy or reproduce all or any part thereof, whether for personal use or resale, without permission.
- Data Sources: California Department of Fish and Wildlife. 2019. RareFind 5.x, California Natural Diversity Data Base. Biogeographic Data Branch, Sacramento, California.
 (updated monthly by subscription service)

Special-Status Species Occurrences Map

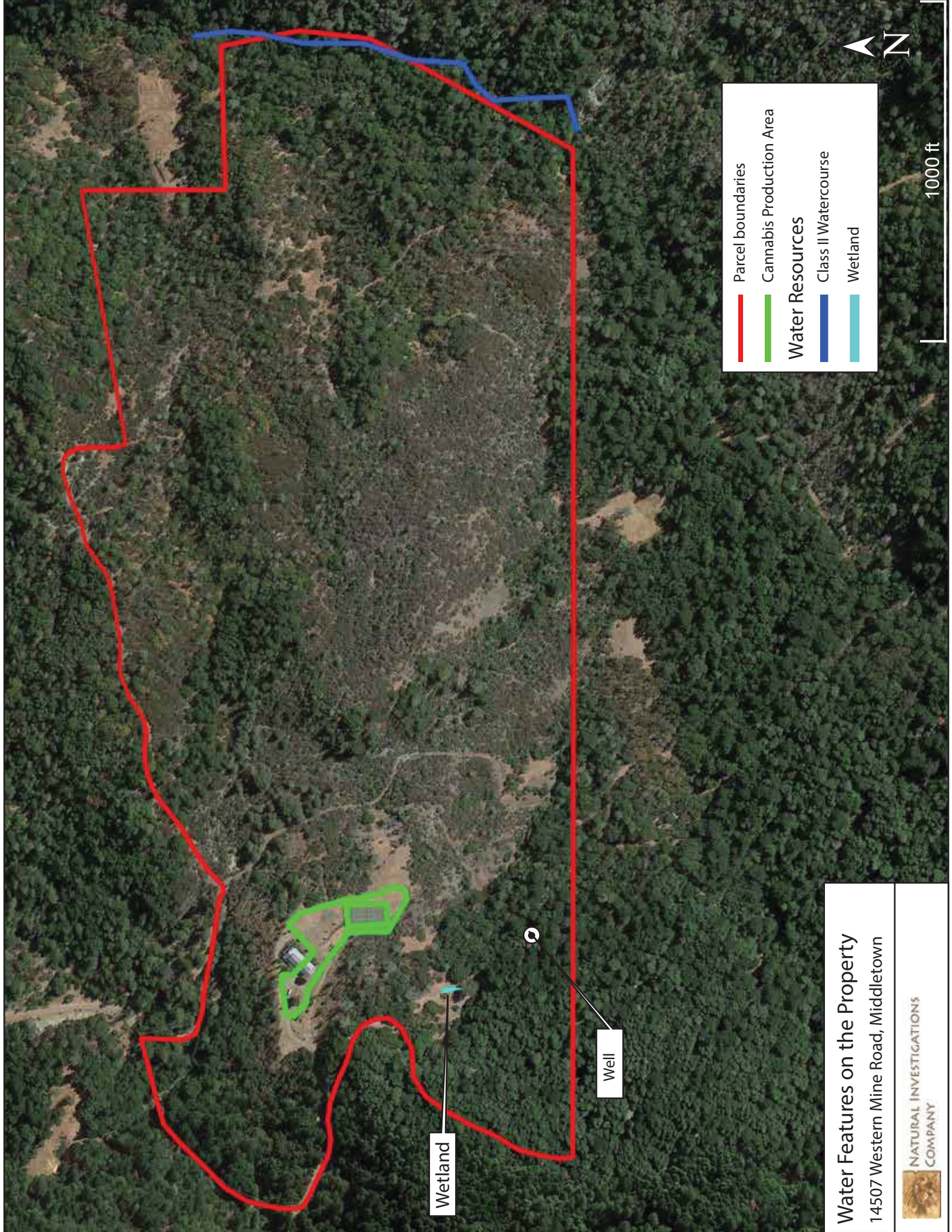
14507 Western Mine Road

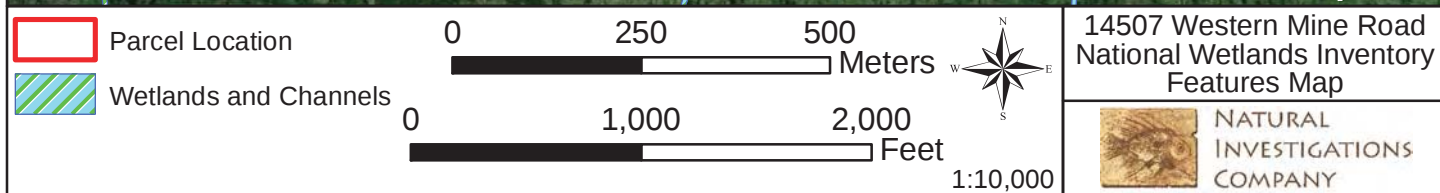
Mount Saint Helena 1997 Quadrangle:
Township 10N, Range 7W, Section 15,16



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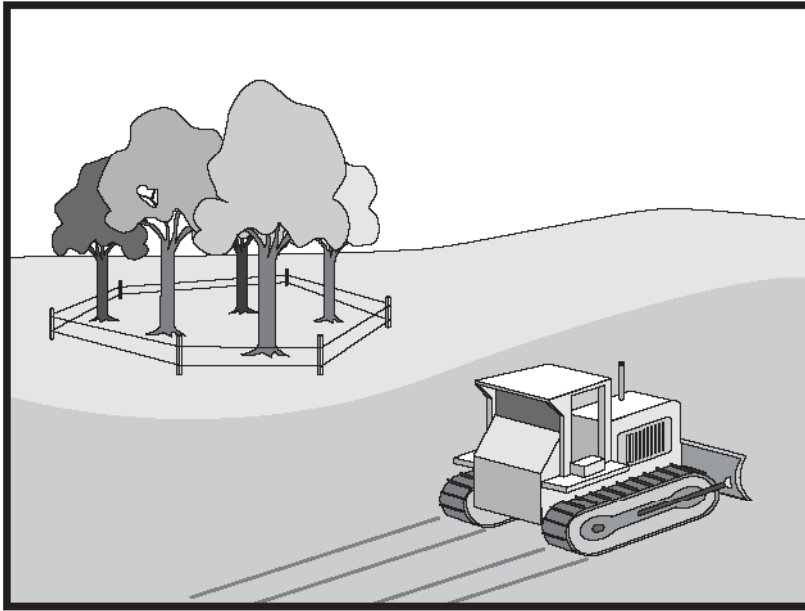
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19.0 APPENDIX: CASQA INDUSTRIAL AND COMMERCIAL HANDBOOK BMP FACT SHEETS

Preservation Of Existing Vegetation EC-2



Description and Purpose

Carefully planned preservation of existing vegetation minimizes the potential of removing or injuring existing trees, vines, shrubs, and grasses that protect soil from erosion.

Suitable Applications

Preservation of existing vegetation is suitable for use on most projects. Large project sites often provide the greatest opportunity for use of this BMP. Suitable applications include the following:

- Areas within the site where no construction activity occurs, or occurs at a later date. This BMP is especially suitable to multi year projects where grading can be phased.
- Areas where natural vegetation exists and is designated for preservation. Such areas often include steep slopes, watercourse, and building sites in wooded areas.
- Areas where local, state, and federal government require preservation, such as vernal pools, wetlands, marshes, certain oak trees, etc. These areas are usually designated on the plans, or in the specifications, permits, or environmental documents.
- Where vegetation designated for ultimate removal can be temporarily preserved and be utilized for erosion control and sediment control.

Objectives

EC	Erosion Control	☒
SE	Sediment Control	
TR	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☐ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

None



EC-2 Preservation Of Existing Vegetation

Limitations

- Requires forward planning by the owner/developer, contractor, and design staff.
- Limited opportunities for use when project plans do not incorporate existing vegetation into the site design.
- For sites with diverse topography, it is often difficult and expensive to save existing trees while grading the site satisfactory for the planned development.

Implementation

The best way to prevent erosion is to not disturb the land. In order to reduce the impacts of new development and redevelopment, projects may be designed to avoid disturbing land in sensitive areas of the site (e.g., natural watercourses, steep slopes), and to incorporate unique or desirable existing vegetation into the site's landscaping plan. Clearly marking and leaving a buffer area around these unique areas during construction will help to preserve these areas as well as take advantage of natural erosion prevention and sediment trapping.

Existing vegetation to be preserved on the site must be protected from mechanical and other injury while the land is being developed. The purpose of protecting existing vegetation is to ensure the survival of desirable vegetation for shade, beautification, and erosion control. Mature vegetation has extensive root systems that help to hold soil in place, thus reducing erosion. In addition, vegetation helps keep soil from drying rapidly and becoming susceptible to erosion. To effectively save existing vegetation, no disturbances of any kind should be allowed within a defined area around the vegetation. For trees, no construction activity should occur within the drip line of the tree.

Timing

- Provide for preservation of existing vegetation prior to the commencement of clearing and grubbing operations or other soil disturbing activities in areas where no construction activity is planned or will occur at a later date.

Design and Layout

- Mark areas to be preserved with temporary fencing. Include sufficient setback to protect roots.
 - Orange colored plastic mesh fencing works well.
 - Use appropriate fence posts and adequate post spacing and depth to completely support the fence in an upright position.
- Locate temporary roadways, stockpiles, and layout areas to avoid stands of trees, shrubs, and grass.
- Consider the impact of grade changes to existing vegetation and the root zone.
- Maintain existing irrigation systems where feasible. Temporary irrigation may be required.
- Instruct employees and subcontractors to honor protective devices. Prohibit heavy equipment, vehicular traffic, or storage of construction materials within the protected area.

Preservation Of Existing Vegetation EC-2

Costs

There is little cost associated with preserving existing vegetation if properly planned during the project design, and these costs may be offset by aesthetic benefits that enhance property values. During construction, the cost for preserving existing vegetation will likely be less than the cost of applying erosion and sediment controls to the disturbed area. Replacing vegetation inadvertently destroyed during construction can be extremely expensive, sometimes in excess of \$10,000 per tree.

Inspection and Maintenance

During construction, the limits of disturbance should remain clearly marked at all times. Irrigation or maintenance of existing vegetation should be described in the landscaping plan. If damage to protected trees still occurs, maintenance guidelines described below should be followed:

- Verify that protective measures remain in place. Restore damaged protection measures immediately.
- Serious tree injuries shall be attended to by an arborist.
- Damage to the crown, trunk, or root system of a retained tree shall be repaired immediately.
- Trench as far from tree trunks as possible, usually outside of the tree drip line or canopy. Curve trenches around trees to avoid large roots or root concentrations. If roots are encountered, consider tunneling under them. When trenching or tunneling near or under trees to be retained, place tunnels at least 18 in. below the ground surface, and not below the tree center to minimize impact on the roots.
- Do not leave tree roots exposed to air. Cover exposed roots with soil as soon as possible. If soil covering is not practical, protect exposed roots with wet burlap or peat moss until the tunnel or trench is ready for backfill.
- Cleanly remove the ends of damaged roots with a smooth cut.
- Fill trenches and tunnels as soon as possible. Careful filling and tamping will eliminate air spaces in the soil, which can damage roots.
- If bark damage occurs, cut back all loosened bark into the undamaged area, with the cut tapered at the top and bottom and drainage provided at the base of the wood. Limit cutting the undamaged area as much as possible.
- Aerate soil that has been compacted over a tree's root zone by punching holes 12 in. deep with an iron bar, and moving the bar back and forth until the soil is loosened. Place holes 18 in. apart throughout the area of compacted soil under the tree crown.
- Fertilization
 - Fertilize stressed or damaged broadleaf trees to aid recovery.
 - Fertilize trees in the late fall or early spring.

EC-2 Preservation Of Existing Vegetation

- Apply fertilizer to the soil over the feeder roots and in accordance with label instructions, but never closer than 3 ft to the trunk. Increase the fertilized area by one-fourth of the crown area for conifers that have extended root systems.
- Retain protective measures until all other construction activity is complete to avoid damage during site cleanup and stabilization.

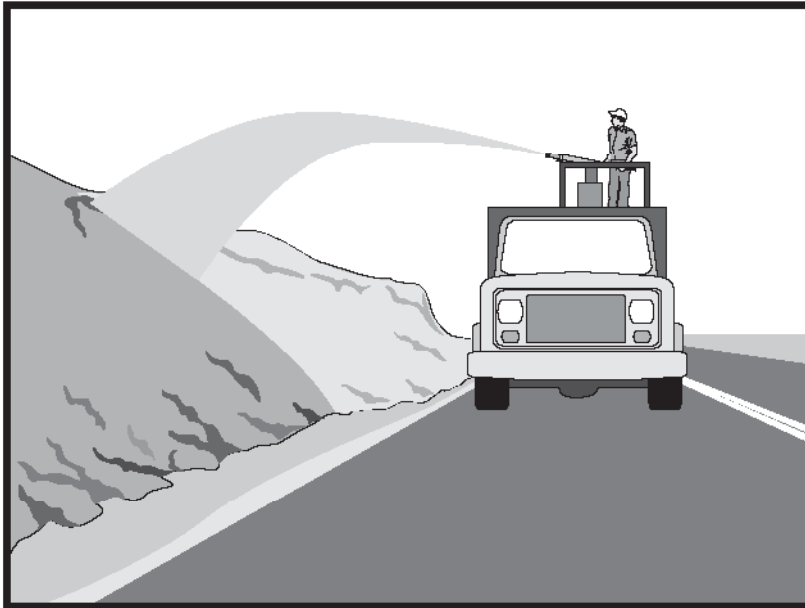
References

County of Sacramento Tree Preservation Ordinance, September 1981.

Stormwater Quality Handbooks Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.

Stormwater Management of the Puget Sound Basin, Technical Manual, Publication #91-75, Washington State Department of Ecology, February 1992.

Water Quality Management Plan for The Lake Tahoe Region, Volume II, Handbook of Management Practices, Tahoe Regional Planning Agency, November 1988.



Description and Purpose

Hydraulic mulch consists of applying a mixture of shredded wood fiber or a hydraulic matrix, and a stabilizing emulsion or tackifier with hydro-mulching equipment, which temporarily protects exposed soil from erosion by raindrop impact or wind.

Suitable Applications

Hydraulic mulch is suitable for soil disturbed areas requiring temporary protection until permanent stabilization is established, and disturbed areas that will be re-disturbed following an extended period of inactivity.

Limitations

Wood fiber hydraulic mulches are generally short lived and need 24 hours to dry before rainfall occurs to be effective. May require a second application in order to remain effective for an entire rainy season.

Implementation

- Prior to application, roughen embankment and fill areas by rolling with a crimping or punching type roller or by track walking. Track walking shall only be used where other methods are impractical.
- To be effective, hydraulic matrices require 24 hours to dry before rainfall occurs.
- Avoid mulch over spray onto roads, sidewalks, drainage channels, existing vegetation, etc.

Objectives

EC	Erosion Control	☒
SE	Sediment Control	
TR	Tracking Control	
WE	Wind Erosion Control	☒
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

- EC-4 Hydroseeding
- EC-5 Soil Binders
- EC-6 Straw Mulch
- EC-7 Geotextiles and Mats
- EC-8 Wood Mulching



- Paper based hydraulic mulches alone shall not be used for erosion control.

Hydraulic Mulches

Wood fiber mulch can be applied alone or as a component of hydraulic matrices. Wood fiber applied alone is typically applied at the rate of 2,000 to 4,000 lb/acre. Wood fiber mulch is manufactured from wood or wood waste from lumber mills or from urban sources.

Hydraulic Matrices

Hydraulic matrices include a mixture of wood fiber and acrylic polymer or other tackifier as binder. Apply as a liquid slurry using a hydraulic application machine (i.e., hydro seeder) at the following minimum rates, or as specified by the manufacturer to achieve complete coverage of the target area: 2,000 to 4,000 lb/acre wood fiber mulch, and 5 to 10% (by weight) of tackifier (acrylic copolymer, guar, psyllium, etc.)

Bonded Fiber Matrix

Bonded fiber matrix (BFM) is a hydraulically applied system of fibers and adhesives that upon drying forms an erosion resistant blanket that promotes vegetation, and prevents soil erosion. BFMs are typically applied at rates from 3,000 lb/acre to 4,000 lb/acre based on the manufacturer's recommendation. A biodegradable BFM is composed of materials that are 100% biodegradable. The binder in the BFM should also be biodegradable and should not dissolve or disperse upon re-wetting. Typically, biodegradable BFMs should not be applied immediately before, during or immediately after rainfall if the soil is saturated. Depending on the product, BFMs typically require 12 to 24 hours to dry and become effective.

Costs

Average cost for installation of wood fiber mulch is \$900/acre. Average cost for installation of BFM is \$5,500/acre.

Inspection and Maintenance

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Areas where erosion is evident shall be repaired and BMPs re-applied as soon as possible. Care should be exercised to minimize the damage to protected areas while making repairs, as any area damaged will require re-application of BMPs.
- Maintain an unbroken, temporary mulched ground cover throughout the period of construction when the soils are not being reworked.

References

Controlling Erosion of Construction Sites Agricultural Information #347, U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) (formerly Soil Conservation Service – SCS).

Guides for Erosion and Sediment Control in California, USDA Soils Conservation Service, January 1991.

Manual of Standards of Erosion and Sediment Control Measures, Association of Bay Area Governments, May 1995.

Sedimentation and Erosion Control, An Inventory of Current Practices Draft, US EPA, April 1990.

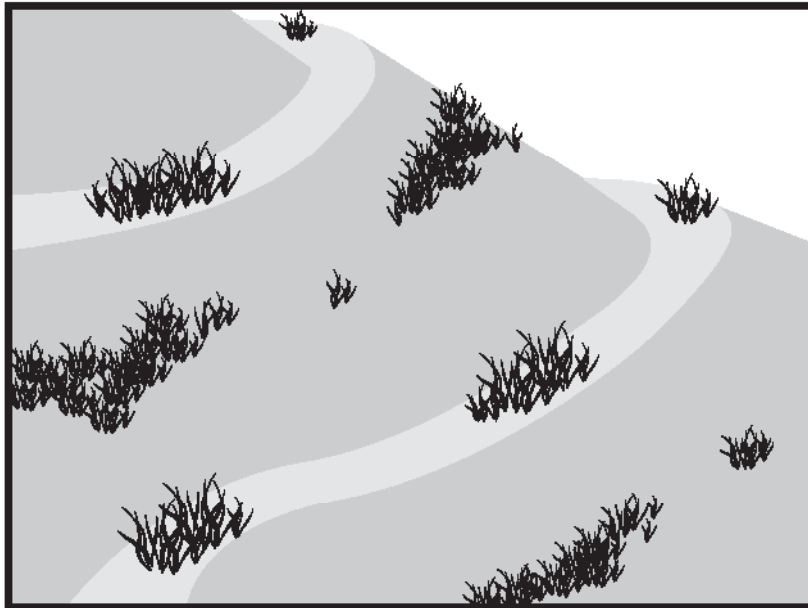
Soil Erosion by Water, Agriculture Information Bulletin #513, U.S. Department of Agriculture, Soil Conservation Service.

Stormwater Quality Handbooks Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.

Guidance Document: Soil Stabilization for Temporary Slopes, State of California Department of Transportation (Caltrans), November 1999

Stormwater Management of the Puget Sound Basin, Technical Manual, Publication #91-75, Washington State Department of Ecology, February 1992.

Water Quality Management Plan for the Lake Tahoe Region, Volume II, Handbook of Management Practices, Tahoe Regional Planning Agency, November 1988.



Description and Purpose

Hydroseeding typically consists of applying a mixture of wood fiber, seed, fertilizer, and stabilizing emulsion with hydro-mulch equipment, to temporarily protect exposed soils from erosion by water and wind.

Suitable Applications

Hydroseeding is suitable for soil disturbed areas requiring temporary protection until permanent stabilization is established, and disturbed areas that will be re-disturbed following an extended period of inactivity.

Limitations

- Hydroseeding may be used alone only when there is sufficient time in the season to ensure adequate vegetation establishment and coverage to provide adequate erosion control. Otherwise, hydroseeding must be used in conjunction with mulching (i.e., straw mulch).
- Steep slopes are difficult to protect with temporary seeding.
- Temporary seeding may not be appropriate in dry periods without supplemental irrigation.
- Temporary vegetation may have to be removed before permanent vegetation is applied.
- Temporary vegetation is not appropriate for short term inactivity.

Objectives

EC	Erosion Control	☒
SE	Sediment Control	
TR	Tracking Control	
WE	Wind Erosion Control	☒
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

- EC-3 Hydraulic Mulch
- EC-5 Soil Binders
- EC-6 Straw Mulch
- EC-7 Geotextiles and Mats
- EC-8 Wood Mulching



Implementation

In order to select appropriate hydroseeding mixtures, an evaluation of site conditions shall be performed with respect to:

- Soil conditions
- Site topography
- Season and climate
- Vegetation types
- Maintenance requirements
- Sensitive adjacent areas
- Water availability
- Plans for permanent vegetation

The local office of the U.S.D.A. Natural Resources Conservation Service (NRCS) is an excellent source of information on appropriate seed mixes.

The following steps shall be followed for implementation:

- Avoid use of hydroseeding in areas where the BMP would be incompatible with future earthwork activities and would have to be removed.
- Hydroseeding can be accomplished using a multiple step or one step process. The multiple step process ensures maximum direct contact of the seeds to soil. When the one step process is used to apply the mixture of fiber, seed, etc., the seed rate shall be increased to compensate for all seeds not having direct contact with the soil.
- Prior to application, roughen the area to be seeded with the furrows trending along the contours.
- Apply a straw mulch to keep seeds in place and to moderate soil moisture and temperature until the seeds germinate and grow.
- All seeds shall be in conformance with the California State Seed Law of the Department of Agriculture. Each seed bag shall be delivered to the site sealed and clearly marked as to species, purity, percent germination, dealer's guarantee, and dates of test. The container shall be labeled to clearly reflect the amount of Pure Live Seed (PLS) contained. All legume seed shall be pellet inoculated. Inoculant sources shall be species specific and shall be applied at a rate of 2 lb of inoculant per 100 lb seed.
- Commercial fertilizer shall conform to the requirements of the California Food and Agricultural Code. Fertilizer shall be pelleted or granular form.
- Follow up applications shall be made as needed to cover weak spots and to maintain adequate soil protection.
- Avoid over spray onto roads, sidewalks, drainage channels, existing vegetation, etc.

Costs

Average cost for installation and maintenance may vary from as low as \$300 per acre for flat slopes and stable soils, to \$1600 per acre for moderate to steep slopes and/or erosive soils.

Hydroseeding		Installed Cost per Acre
High Density	Ornamentals	\$400 - \$1600
	Turf Species	\$350
	Bunch Grasses	\$300 - \$1300
Fast Growing	Annual	\$350 - \$650
	Perennial	\$300 - \$800
Non-Competing	Native	\$300 - \$1600
	Non-Native	\$400 - \$500
Sterile	Cereal Grain	\$500

Source: Caltrans Guidance for Soil Stabilization for Temporary Slopes, Nov. 1999

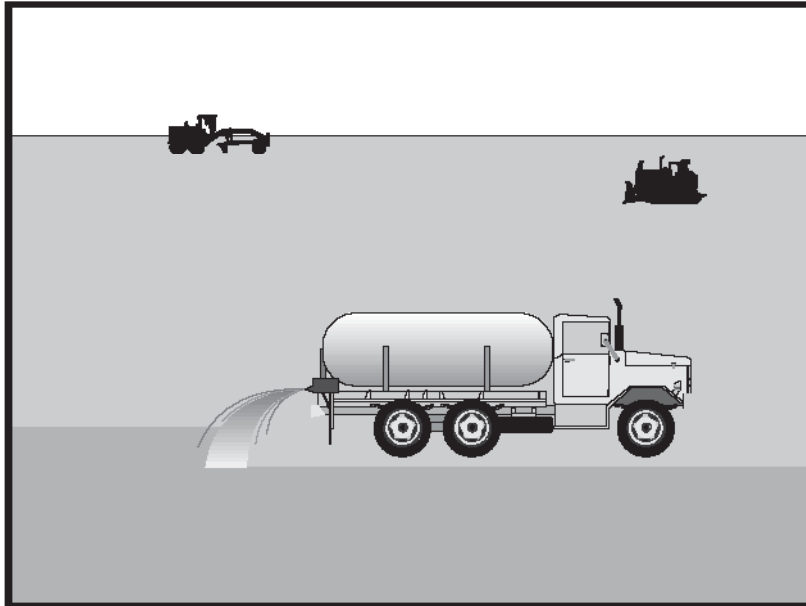
Inspection and Maintenance

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Areas where erosion is evident shall be repaired and BMPs re-applied as soon as possible. Care should be exercised to minimize the damage to protected areas while making repairs, as any area damaged will require re-application of BMPs.
- Where seeds fail to germinate, or they germinate and die, the area must be re-seeded, fertilized, and mulched within the planting season, using not less than half the original application rates.
- Irrigation systems, if applicable, should be inspected daily while in use to identify system malfunctions and line breaks. When line breaks are detected, the system must be shut down immediately and breaks repaired before the system is put back into operation.
- Irrigation systems shall be inspected for complete coverage and adjusted as needed to maintain complete coverage.

References

Stormwater Quality Handbooks Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.

Guidance Document: Soil Stabilization for Temporary Slopes, State of California Department of Transportation (Caltrans), November 1999.



Description and Purpose

Soil binders consist of applying and maintaining a soil stabilizer to exposed soil surfaces. Soil binders are materials applied to the soil surface to temporarily prevent water induced erosion of exposed soils on construction sites. Soil binders also prevent wind erosion.

Suitable Applications

Soil binders are typically applied to disturbed areas requiring short term temporary protection. Because soil binders can often be incorporated into the work, they are a good alternative to mulches in areas where grading activities will soon resume. Soil binders are also suitable for use on stockpiles.

Limitations

- Soil binders are temporary in nature and may need reapplication.
- Soil binders require a minimum curing time until fully effective, as prescribed by the manufacturer. Curing time may be 24 hours or longer. Soil binders may need reapplication after a storm event.
- Soil binders will generally experience spot failures during heavy rainfall events. If runoff penetrates the soil at the top of a slope treated with a soil binder, it is likely that the runoff will undercut the stabilized soil layer and discharge at a point further down slope.

Objectives

EC	Erosion Control	☒
SE	Sediment Control	
TR	Tracking Control	
WE	Wind Erosion Control	☒
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

- EC-3 Hydraulic Mulch
- EC-4 Hydroseeding
- EC-6 Straw Mulch
- EC-7 Geotextiles and Mats
- EC-8 Wood Mulching



- Soil binders do not hold up to pedestrian or vehicular traffic across treated areas.
- Soil binders may not penetrate soil surfaces made up primarily of silt and clay, particularly when compacted.
- Some soil binders may not perform well with low relative humidity. Under rainy conditions, some agents may become slippery or leach out of the soil.
- Soil binders may not cure if low temperatures occur within 24 hours of application.
- The water quality impacts of soil binders are relatively unknown and some may have water quality impacts due to their chemical makeup.
- A sampling and analysis plan must be incorporated into the SWPPP as soil binders could be a source of non-visible pollutants.

Implementation

General Considerations

- Regional soil types will dictate appropriate soil binders to be used.
- A soil binder must be environmentally benign (non-toxic to plant and animal life), easy to apply, easy to maintain, economical, and should not stain paved or painted surfaces. Soil binders should not pollute stormwater.
- Some soil binders may not be compatible with existing vegetation.
- Performance of soil binders depends on temperature, humidity, and traffic across treated areas.
- Avoid over spray onto roads, sidewalks, drainage channels, existing vegetation, etc.

Selecting a Soil Binder

Properties of common soil binders used for erosion control are provided on Table 1 at the end of this BMP. Use Table 1 to select an appropriate soil binder. Refer to WE-1, Wind Erosion Control, for dust control soil binders.

Factors to consider when selecting a soil binder include the following:

- Suitability to situation - Consider where the soil binder will be applied, if it needs a high resistance to leaching or abrasion, and whether it needs to be compatible with any existing vegetation. Determine the length of time soil stabilization will be needed, and if the soil binder will be placed in an area where it will degrade rapidly. In general, slope steepness is not a discriminating factor for the listed soil binders.
- Soil types and surface materials - Fines and moisture content are key properties of surface materials. Consider a soil binder's ability to penetrate, likelihood of leaching, and ability to form a surface crust on the surface materials.
- Frequency of application - The frequency of application can be affected by subgrade conditions, surface type, climate, and maintenance schedule. Frequent applications could

lead to high costs. Application frequency may be minimized if the soil binder has good penetration, low evaporation, and good longevity. Consider also that frequent application will require frequent equipment clean up.

Plant-Material Based (Short Lived) Binders

Guar: Guar is a non-toxic, biodegradable, natural galactomannan based hydrocolloid treated with dispersant agents for easy field mixing. It should be mixed with water at the rate of 11 to 15 lb per 1,000 gallons. Recommended minimum application rates are as follows:

Application Rates for Guar Soil Stabilizer

Slope (H:V):	Flat	4:1	3:1	2:1	1:1
lb/acre:	40	45	50	60	70

Psyllium: Psyllium is composed of the finely ground muciloid coating of plantago seeds that is applied as a dry powder or in a wet slurry to the surface of the soil. It dries to form a firm but rewettable membrane that binds soil particles together but permits germination and growth of seed. Psyllium requires 12 to 18 hours drying time. Application rates should be from 80 to 200 lb/acre, with enough water in solution to allow for a uniform slurry flow.

Starch: Starch is non-ionic, cold water soluble (pre-gelatinized) granular cornstarch. The material is mixed with water and applied at the rate of 150 lb/acre. Approximate drying time is 9 to 12 hours.

Plant-Material Based (Long Lived) Binders

Pitch and Rosin Emulsion: Generally, a non-ionic pitch and rosin emulsion has a minimum solids content of 48%. The rosin should be a minimum of 26% of the total solids content. The soil stabilizer should be non-corrosive, water dilutable emulsion that upon application cures to a water insoluble binding and cementing agent. For soil erosion control applications, the emulsion is diluted and should be applied as follows:

- For clayey soil: 5 parts water to 1 part emulsion
- For sandy soil: 10 parts water to 1 part emulsion

Application can be by water truck or hydraulic seeder with the emulsion and product mixture applied at the rate specified by the manufacturer.

Polymeric Emulsion Blend Binders

Acrylic Copolymers and Polymers: Polymeric soil stabilizers should consist of a liquid or solid polymer or copolymer with an acrylic base that contains a minimum of 55% solids. The polymeric compound should be handled and mixed in a manner that will not cause foaming or should contain an anti-foaming agent. The polymeric emulsion should not exceed its shelf life or expiration date; manufacturers should provide the expiration date. Polymeric soil stabilizer should be readily miscible in water, non-injurious to seed or animal life, non-flammable, should provide surface soil stabilization for various soil types without totally inhibiting water infiltration, and should not re-emulsify when cured. The applied compound should air cure within a maximum of 36 to 48 hours. Liquid copolymer should be diluted at a rate of 10 parts water to 1 part polymer and the mixture applied to soil at a rate of 1,175 gallons/acre.

Liquid Polymers of Methacrylates and Acrylates: This material consists of a tackifier/sealer that is a liquid polymer of methacrylates and acrylates. It is an aqueous 100% acrylic emulsion blend of 40% solids by volume that is free from styrene, acetate, vinyl, ethoxylated surfactants or silicates. For soil stabilization applications, it is diluted with water in accordance with manufacturer's recommendations, and applied with a hydraulic seeder at the rate of 20 gallons/acre. Drying time is 12 to 18 hours after application.

Copolymers of Sodium Acrylates and Acrylamides: These materials are non-toxic, dry powders that are copolymers of sodium acrylate and acrylamide. They are mixed with water and applied to the soil surface for erosion control at rates that are determined by slope gradient:

Slope Gradient (H:V)	lb/acre
Flat to 5:1	3.0 – 5.0
5:1 to 3:1	5.0 – 10.0
2:2 to 1:1	10.0 – 20.0

Poly-Acrylamide and Copolymer of Acrylamide: Linear copolymer polyacrylamide is packaged as a dry flowable solid. When used as a stand alone stabilizer, it is diluted at a rate of 11lb/1,000 gal of water and applied at the rate of 5.0 lb/acre.

Hydro-Colloid Polymers: Hydro-Colloid Polymers are various combinations of dry flowable poly-acrylamides, copolymers and hydro-colloid polymers that are mixed with water and applied to the soil surface at rates of 55 to 60 lb/acre. Drying times are 0 to 4 hours.

Cementitious-Based Binders

Gypsum: This is a formulated gypsum based product that readily mixes with water and mulch to form a thin protective crust on the soil surface. It is composed of high purity gypsum that is ground, calcined and processed into calcium sulfate hemihydrate with a minimum purity of 86%. It is mixed in a hydraulic seeder and applied at rates 4,000 to 12,000 lb/acre. Drying time is 4 to 8 hours.

Applying Soil Binders

After selecting an appropriate soil binder, the untreated soil surface must be prepared before applying the soil binder. The untreated soil surface must contain sufficient moisture to assist the agent in achieving uniform distribution. In general, the following steps should be followed:

- Follow manufacturer's written recommendations for application rates, pre-wetting of application area, and cleaning of equipment after use.
- Prior to application, roughen embankment and fill areas.
- Consider the drying time for the selected soil binder and apply with sufficient time before anticipated rainfall. Soil binders should not be applied during or immediately before rainfall.
- Avoid over spray onto roads, sidewalks, drainage channels, sound walls, existing vegetation, etc.

- Soil binders should not be applied to frozen soil, areas with standing water, under freezing or rainy conditions, or when the temperature is below 40°F during the curing period.
- More than one treatment is often necessary, although the second treatment may be diluted or have a lower application rate.
- Generally, soil binders require a minimum curing time of 24 hours before they are fully effective. Refer to manufacturer's instructions for specific cure time.
- For liquid agents:
 - Crown or slope ground to avoid ponding.
 - Uniformly pre-wet ground at 0.03 to 0.3 gal/yd² or according to manufacturer's recommendations.
 - Apply solution under pressure. Overlap solution 6 to 12 in.
 - Allow treated area to cure for the time recommended by the manufacturer; typically at least 24 hours.
 - Apply second treatment before first treatment becomes ineffective, using 50% application rate.
 - In low humidities, reactivate chemicals by re-wetting with water at 0.1 to 0.2 gal/yd².

Costs

Costs vary according to the soil stabilizer selected for implementation. The following are approximate costs:

Soil Binder	Cost per Acre
Plant-Material Based (Short Lived) Binders	\$400
Plant-Material Based (Long Lived) Binders	\$1,200
Polymeric Emulsion Blend Binders	\$400 ⁽¹⁾
Cementitious-Based Binders	\$800

(1) \$1,200 for Acrylic polymers and copolymers

Source: Caltrans Guidance for Soil Stabilization for Temporary Slopes, Nov. 1999

Inspection and Maintenance

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Areas where erosion is evident shall be repaired and BMPs re-applied as soon as possible. Care should be exercised to minimize the damage to protected areas while making repairs, as any area damaged will require re-application of BMPs.
- Reapply the selected soil binder as needed to maintain effectiveness.

References

Manual of Standards of Erosion and Sediment Control Measures, Association of Bay Area Governments, May 1995.

Sedimentation and Erosion Control, An Inventory of Current Practices Draft, US EPA, April 1990.

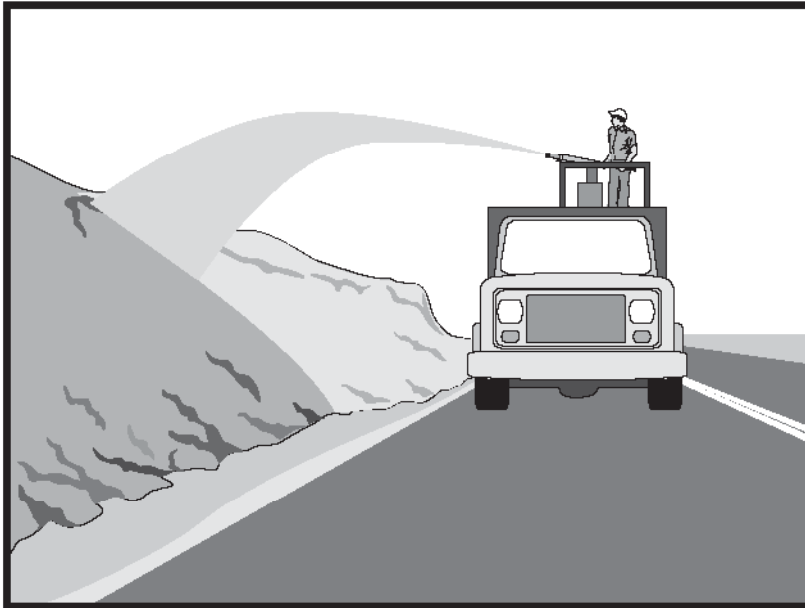
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Stormwater Management for Construction Activities, Developing Pollution Prevention Plans and Best Management Practices, EPA 832-R-92005; USEPA, April 1992.

Table 1 Properties of Soil Binders for Erosion Control				
Evaluation Criteria	Binder Type			
	Plant Material Based (Short Lived)	Plant Material Based (Long Lived)	Polymeric Emulsion Blends	Cementitious-Based Binders
Relative Cost	Low	Low	Low	Low
Resistance to Leaching	High	High	Low to Moderate	Moderate
Resistance to Abrasion	Moderate	Low	Moderate to High	Moderate to High
Longevity	Short to Medium	Medium	Medium to Long	Medium
Minimum Curing Time before Rain	9 to 18 hours	19 to 24 hours	0 to 24 hours	4 to 8 hours
Compatibility with Existing Vegetation	Good	Poor	Poor	Poor
Mode of Degradation	Biodegradable	Biodegradable	Photodegradable/ Chemically Degradable	Photodegradable/ Chemically Degradable
Labor Intensive	No	No	No	No
Specialized Application Equipment	Water Truck or Hydraulic Mulcher	Water Truck or Hydraulic Mulcher	Water Truck or Hydraulic Mulcher	Water Truck or Hydraulic Mulcher
Liquid/Powder	Powder	Liquid	Liquid/Powder	Powder
Surface Crusting	Yes, but dissolves on rewetting	Yes	Yes, but dissolves on rewetting	Yes
Clean Up	Water	Water	Water	Water
Erosion Control Application Rate	Varies ⁽¹⁾	Varies ⁽¹⁾	Varies ⁽¹⁾	4,000 to 12,000 lbs/acre

(1) See Implementation for specific rates.



Description and Purpose

Straw mulch consists of placing a uniform layer of straw and incorporating it into the soil with a studded roller or anchoring it with a tackifier stabilizing emulsion. Straw mulch protects the soil surface from the impact of rain drops, preventing soil particles from becoming dislodged.

Suitable Applications

Straw mulch is suitable for soil disturbed areas requiring temporary protection until permanent stabilization is established. Straw mulch is typically used for erosion control on disturbed areas until soils can be prepared for permanent vegetation. Straw mulch is also used in combination with temporary and/or permanent seeding strategies to enhance plant establishment.

Limitations

- Availability of straw and straw blowing equipment may be limited just prior to the rainy season and prior to storms due to high demand.
- There is a potential for introduction of weed seed and unwanted plant material.
- When straw blowers are used to apply straw mulch, the treatment areas must be within 150 ft of a road or surface capable of supporting trucks.
- Straw mulch applied by hand is more time intensive and potentially costly.

Objectives

EC	Erosion Control	☒
SE	Sediment Control	
TR	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

- EC-3 Hydraulic Mulch
- EC-4 Hydroseeding
- EC-5 Soil Binders
- EC-7 Geotextiles and Mats
- EC-8 Wood Mulching



- Wind may limit application of straw and blow straw into undesired locations.
- May have to be removed prior to permanent seeding or prior to further earthwork.
- “Punching” of straw does not work in sandy soils, necessitating the use of tackifiers.

Implementation

- Straw shall be derived from wheat, rice, or barley. Where required by the plans, specifications, permits, or environmental documents, native grass straw shall be used.
- A tackifier is the preferred method for anchoring straw mulch to the soil on slopes.
- Crimping, punch roller-type rollers, or track walking may also be used to incorporate straw mulch into the soil on slopes. Track walking shall only be used where other methods are impractical.
- Avoid placing straw onto roads, sidewalks, drainage channels, sound walls, existing vegetation, etc.
- Straw mulch with tackifier shall not be applied during or immediately before rainfall.
- In San Diego, use of straw near wood framed home construction has been frowned on by the Fire Marshall.

Application Procedures

- Apply straw at a minimum rate of 4,000 lb/acre, either by machine or by hand distribution.
- Roughen embankments and fill rills before placing the straw mulch by rolling with a crimping or punching type roller or by track walking.
- Evenly distribute straw mulch on the soil surface.
- Anchor straw mulch to the soil surface by “punching” it into the soil mechanically (incorporating). Alternatively, use a tackifier to adhere straw fibers.
- Methods for holding the straw mulch in place depend upon the slope steepness, accessibility, soil conditions, and longevity.
 - On small areas, a spade or shovel can be used to punch in straw mulch.
 - On slopes with soils that are stable enough and of sufficient gradient to safely support construction equipment without contributing to compaction and instability problems, straw can be “punched” into the ground using a knife blade roller or a straight bladed coultter, known commercially as a “crimper”.
 - On small areas and/or steep slopes, straw can also be held in place using plastic netting or jute. The netting shall be held in place using 11 gauge wire staples, geotextile pins or wooden stakes as described in EC-7, Geotextiles and Mats.
 - A tackifier acts to glue the straw fibers together and to the soil surface. The tackifier shall be selected based on longevity and ability to hold the fibers in place. A tackifier is

typically applied at a rate of 125 lb/acre. In windy conditions, the rates are typically 180 lb/acre.

Costs

Average annual cost for installation and maintenance (3-4 months useful life) is \$2,500 per acre. Application by hand is more time intensive and potentially costly.

Inspection and Maintenance

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Areas where erosion is evident should be repaired and BMPs re-applied as soon as possible. Care should be exercised to minimize the damage to protected areas while making repairs, as any area damaged will require re-application of BMPs.
- The key consideration in inspection and maintenance is that the straw needs to last long enough to achieve erosion control objectives.
- Maintain an unbroken, temporary mulched ground cover while disturbed soil areas are inactive. Repair any damaged ground cover and re-mulch exposed areas.
- Reapplication of straw mulch and tackifier may be required to maintain effective soil stabilization over disturbed areas and slopes.

References

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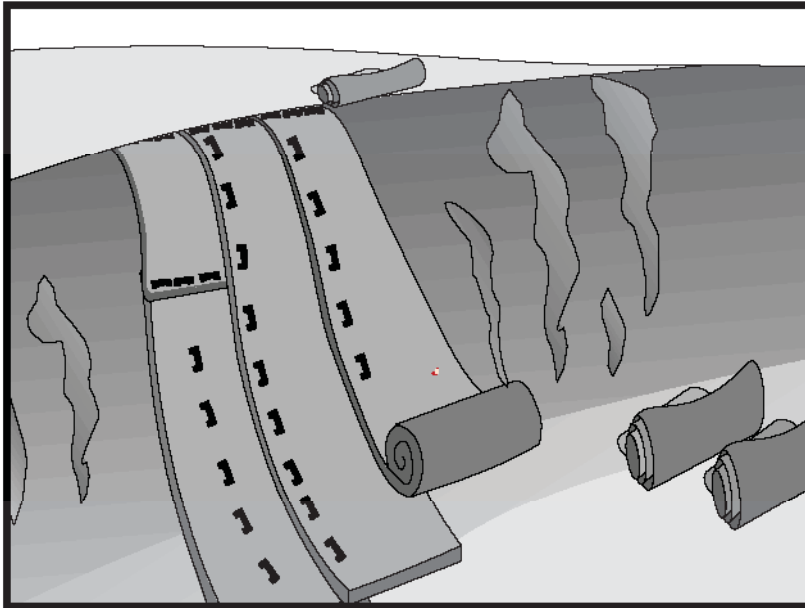
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Description and Purpose

Matting of natural materials are used to cover the soil surface to reduce erosion from rainfall impact, hold soil in place, and absorb and hold moisture near the soil surface. Additionally, matting may be used to stabilize soils until vegetation is established.

Suitable Applications

Matting are commonly applied on short, steep slopes where erosion hazard is high and vegetation will be slow to establish. Matting are also used on stream banks where moving water at velocities between 3 ft/s and 6 ft/s are likely to wash out new vegetation, and in areas where the soil surface is disturbed and where existing vegetation has been removed. Matting may also be used when seeding cannot occur (e.g., late season construction and/or the arrival of an early rain season). Erosion control matting should be considered when the soils are fine grained and potentially erosive. These measures should be considered in the following situations.

- Steep slopes, generally steeper than 3:1 (H:V)
- Slopes where the erosion potential is high
- Slopes and disturbed soils where mulch must be anchored
- Disturbed areas where plants are slow to develop
- Channels with flows exceeding 3.3 ft/s

Objectives

EC	Erosion Control	☒
SE	Sediment Control	
TR	Tracking Control	
WE	Wind Erosion Control	3
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

- EC-3 Hydraulic Mulch
- EC-4 Hydroseeding
- EC-5 Soil Binders
- EC-6 Straw Mulch
- EC-8 Wood Mulching



- Channels to be vegetated
- Stockpiles
- Slopes adjacent to water bodies of Environmentally Sensitive Areas (ESAs)

Limitations

- Properly installed mattings provide excellent erosion control but do so at relatively high cost. This high cost typically limits the use of mattings to areas of concentrated channel flow and steep slopes.
- Mattings are more costly than other BMP practices, limiting their use to areas where other BMPs are ineffective (e.g. channels, steep slopes).
- Installation is critical and requires experienced contractors. The contractor should install the matting material in such a manner that continuous contact between the material and the soil occurs.
- Geotextiles and Mats may delay seed germination, due to reduction in soil temperature.
- Blankets and mats are generally not suitable for excessively rocky sites or areas where the final vegetation will be mowed (since staples and netting can catch in mowers).
- Blankets and mats must be removed and disposed of prior to application of permanent soil stabilization measures.
- Plastic sheeting is easily vandalized, easily torn, photodegradable, and must be disposed of at a landfill.
- Plastic results in 100% runoff, which may cause serious erosion problems in the areas receiving the increased flow.
- The use of plastic should be limited to covering stockpiles or very small graded areas for short periods of time (such as through one imminent storm event) until alternative measures, such as seeding and mulching, may be installed.
- Geotextiles, mats, plastic covers, and erosion control covers have maximum flow rate limitations; consult the manufacturer for proper selection.
- Not suitable for areas that have heavy foot traffic (tripping hazard) – e.g., pad areas around buildings under construction.

Implementation***Material Selection***

Organic matting materials have been found to be effective where re-vegetation will be provided by re-seeding. The choice of matting should be based on the size of area, side slopes, surface conditions such as hardness, moisture, weed growth, and availability of materials.

The following natural and synthetic mattings are commonly used:

Geotextiles

- Material should be a woven polypropylene fabric with minimum thickness of 0.06 in., minimum width of 12 ft and should have minimum tensile strength of 150 lbs (warp), 80 lbs (fill) in conformance with the requirements in ASTM Designation: D 4632. The permittivity of the fabric should be approximately 0.07 sec^{-1} in conformance with the requirements in ASTM Designation: D4491. The fabric should have an ultraviolet (UV) stability of 70 percent in conformance with the requirements in ASTM designation: D4355. Geotextile blankets must be secured in place with wire staples or sandbags and by keying into tops of slopes to prevent infiltration of surface waters under geotextile. Staples should be made of minimum 11 gauge steel wire and should be U-shaped with 8 in. legs and 2 in. crown.
- Geotextiles may be reused if they are suitable for the use intended.

Plastic Covers

- Plastic sheeting should have a minimum thickness of 6 mils, and must be keyed in at the top of slope and firmly held in place with sandbags or other weights placed no more than 10 ft apart. Seams are typically taped or weighted down their entire length, and there should be at least a 12 in. to 24 in. overlap of all seams. Edges should be embedded a minimum of 6 in. in soil.
- All sheeting must be inspected periodically after installation and after significant rainstorms to check for erosion, undermining, and anchorage failure. Any failures must be repaired immediately. If washout or breakages occur, the material should be re-installed after repairing the damage to the slope.

Erosion Control Blankets/Mats

- Biodegradable rolled erosion control products (RECPs) are typically composed of jute fibers, curled wood fibers, straw, coconut fiber, or a combination of these materials. In order for an RECP to be considered 100% biodegradable, the netting, sewing or adhesive system that holds the biodegradable mulch fibers together must also be biodegradable.
 - **Jute** is a natural fiber that is made into a yarn that is loosely woven into a biodegradable mesh. It is designed to be used in conjunction with vegetation and has longevity of approximately one year. The material is supplied in rolled strips, which should be secured to the soil with U-shaped staples or stakes in accordance with manufacturers' recommendations.
 - **Excelsior** (curled wood fiber) blanket material should consist of machine produced mats of curled wood excelsior with 80 percent of the fiber 6 in. or longer. The excelsior blanket should be of consistent thickness. The wood fiber must be evenly distributed over the entire area of the blanket. The top surface of the blanket should be covered with a photodegradable extruded plastic mesh. The blanket should be smolder resistant without the use of chemical additives and should be non-toxic and non-injurious to plant and animal life. Excelsior blankets should be furnished in rolled strips, a minimum of 48 in. wide, and should have an average weight of 0.8 lb/yd^2 , ± 10 percent, at the time of manufacture. Excelsior blankets must be secured in place with wire staples. Staples

should be made of minimum 11 gauge steel wire and should be U-shaped with 8 in. legs and 2 in. crown.

- **Straw blanket** should be machine produced mats of straw with a lightweight biodegradable netting top layer. The straw should be attached to the netting with biodegradable thread or glue strips. The straw blanket should be of consistent thickness. The straw should be evenly distributed over the entire area of the blanket. Straw blanket should be furnished in rolled strips a minimum of 6.5 ft wide, a minimum of 80 ft long and a minimum of 0.5 lb/yd². Straw blankets must be secured in place with wire staples. Staples should be made of minimum 11 gauge steel wire and should be U-shaped with 8 in. legs and 2 in. crown.
- **Wood fiber blanket** is composed of biodegradable fiber mulch with extruded plastic netting held together with adhesives. The material is designed to enhance re-vegetation. The material is furnished in rolled strips, which must be secured to the ground with U-shaped staples or stakes in accordance with manufacturers' recommendations.
- **Coconut fiber blanket** should be a machine produced mat of 100 percent coconut fiber with biodegradable netting on the top and bottom. The coconut fiber should be attached to the netting with biodegradable thread or glue strips. The coconut fiber blanket should be of consistent thickness. The coconut fiber should be evenly distributed over the entire area of the blanket. Coconut fiber blanket should be furnished in rolled strips with a minimum of 6.5 ft wide, a minimum of 80 ft. long and a minimum of 0.5 lb/yd². Coconut fiber blankets must be secured in place with wire staples. Staples should be made of minimum 11 gauge steel wire and should be U-shaped with 8 in. legs and 2 in. crown.
- **Coconut fiber mesh** is a thin permeable membrane made from coconut or corn fiber that is spun into a yarn and woven into a biodegradable mat. It is designed to be used in conjunction with vegetation and typically has longevity of several years. The material is supplied in rolled strips, which must be secured to the soil with U-shaped staples or stakes in accordance with manufacturers' recommendations.
- **Straw coconut fiber blanket** should be machine produced mats of 70 percent straw and 30 percent coconut fiber with a biodegradable netting top layer and a biodegradable bottom net. The straw and coconut fiber should be attached to the netting with biodegradable thread or glue strips. The straw coconut fiber blanket should be of consistent thickness. The straw and coconut fiber should be evenly distributed over the entire area of the blanket. Straw coconut fiber blanket should be furnished in rolled strips a minimum of 6.5 ft wide, a minimum of 80 ft long and a minimum of 0.5 lb/yd². Straw coconut fiber blankets must be secured in place with wire staples. Staples should be made of minimum 11 gauge steel wire and should be U-shaped with 8 in. legs and 2 in. crown.
- Non-biodegradable RECPs are typically composed of polypropylene, polyethylene, nylon or other synthetic fibers. In some cases, a combination of biodegradable and synthetic fibers is used to construct the RECP. Netting used to hold these fibers together is typically non-biodegradable as well.

- **Plastic netting** is a lightweight biaxially oriented netting designed for securing loose mulches like straw or paper to soil surfaces to establish vegetation. The netting is photodegradable. The netting is supplied in rolled strips, which must be secured with U-shaped staples or stakes in accordance with manufacturers' recommendations.
- **Plastic mesh** is an open weave geotextile that is composed of an extruded synthetic fiber woven into a mesh with an opening size of less than 1/4 in. It is used with re-vegetation or may be used to secure loose fiber such as straw to the ground. The material is supplied in rolled strips, which must be secured to the soil with U-shaped staples or stakes in accordance with manufacturers' recommendations.
- **Synthetic fiber with netting** is a mat that is composed of durable synthetic fibers treated to resist chemicals and ultraviolet light. The mat is a dense, three dimensional mesh of synthetic (typically polyolefin) fibers stitched between two polypropylene nets. The mats are designed to be re-vegetated and provide a permanent composite system of soil, roots, and geomatrix. The material is furnished in rolled strips, which must be secured with U-shaped staples or stakes in accordance with manufacturers' recommendations.
- **Bonded synthetic fibers** consist of a three dimensional geomatrix nylon (or other synthetic) matting. Typically it has more than 90 percent open area, which facilitates root growth. It's tough root reinforcing system anchors vegetation and protects against hydraulic lift and shear forces created by high volume discharges. It can be installed over prepared soil, followed by seeding into the mat. Once vegetated, it becomes an invisible composite system of soil, roots, and geomatrix. The material is furnished in rolled strips that must be secured with U-shaped staples or stakes in accordance with manufacturers' recommendations.
- **Combination synthetic and biodegradable RECPs** consist of biodegradable fibers, such as wood fiber or coconut fiber, with a heavy polypropylene net stitched to the top and a high strength continuous filament geomatrix or net stitched to the bottom. The material is designed to enhance re-vegetation. The material is furnished in rolled strips, which must be secured with U-shaped staples or stakes in accordance with manufacturers' recommendations.

Site Preparation

- Proper site preparation is essential to ensure complete contact of the blanket or matting with the soil.
- Grade and shape the area of installation.
- Remove all rocks, clods, vegetation or other obstructions so that the installed blankets or mats will have complete, direct contact with the soil.
- Prepare seedbed by loosening 2 to 3 in. of topsoil.

Seeding

Seed the area before blanket installation for erosion control and revegetation. Seeding after mat installation is often specified for turf reinforcement application. When seeding prior to blanket

installation, all check slots and other areas disturbed during installation must be re-seeded. Where soil filling is specified, seed the matting and the entire disturbed area after installation and prior to filling the mat with soil.

Fertilize and seed in accordance with seeding specifications or other types of landscaping plans. When using jute matting on a seeded area, apply approximately half the seed before laying the mat and the remainder after laying the mat. The protective matting can be laid over areas where grass has been planted and the seedlings have emerged. Where vines or other ground covers are to be planted, lay the protective matting first and then plant through matting according to design of planting.

Check Slots

Check slots are made of glass fiber strips, excelsior matting strips or tight folded jute matting blanket or strips for use on steep, highly erodible watercourses. The check slots are placed in narrow trenches 6 to 12 in. deep across the channel and left flush with the soil surface. They are to cover the full cross section of designed flow.

Laying and Securing Matting

- Before laying the matting, all check slots should be installed and the friable seedbed made free from clods, rocks, and roots. The surface should be compacted and finished according to the requirements of the manufacturer's recommendations.
- Mechanical or manual lay down equipment should be capable of handling full rolls of fabric and laying the fabric smoothly without wrinkles or folds. The equipment should meet the fabric manufacturer's recommendations or equivalent standards.

Anchoring

- U-shaped wire staples, metal geotextile stake pins, or triangular wooden stakes can be used to anchor mats and blankets to the ground surface.
- Wire staples should be made of minimum 11 gauge steel wire and should be U-shaped with 8 in. legs and 2 in. crown.
- Metal stake pins should be 0.188 in. diameter steel with a 1.5 in. steel washer at the head of the pin, and 8 in. in length.
- Wire staples and metal stakes should be driven flush to the soil surface.

Installation on Slopes

Installation should be in accordance with the manufacturer's recommendations. In general, these will be as follows:

- Begin at the top of the slope and anchor the blanket in a 6 in. deep by 6 in. wide trench. Backfill trench and tamp earth firmly.
- Unroll blanket down slope in the direction of water flow.
- Overlap the edges of adjacent parallel rolls 2 to 3 in. and staple every 3 ft.

- When blankets must be spliced, place blankets end over end (shingle style) with 6 in. overlap. Staple through overlapped area, approximately 12 in. apart.
- Lay blankets loosely and maintain direct contact with the soil. Do not stretch.
- Staple blankets sufficiently to anchor blanket and maintain contact with the soil. Staples should be placed down the center and staggered with the staples placed along the edges. Steep slopes, 1:1 (H:V) to 2:1 (H:V), require a minimum of 2 staples/yd². Moderate slopes, 2:1 (H:V) to 3:1 (H:V), require a minimum of 1 1/2 staples/yd².

Installation in Channels

Installation should be in accordance with the manufacturer's recommendations. In general, these will be as follows:

- Dig initial anchor trench 12 in. deep and 6 in. wide across the channel at the lower end of the project area.
- Excavate intermittent check slots, 6 in. deep and 6 in. wide across the channel at 25 to 30 ft intervals along the channels.
- Cut longitudinal channel anchor trenches 4 in. deep and 4 in. wide along each side of the installation to bury edges of matting, whenever possible extend matting 2 to 3 in. above the crest of the channel side slopes.
- Beginning at the downstream end and in the center of the channel, place the initial end of the first roll in the anchor trench and secure with fastening devices at 12 in. intervals. Note: matting will initially be upside down in anchor trench.
- In the same manner, position adjacent rolls in anchor trench, overlapping the preceding roll a minimum of 3 in.
- Secure these initial ends of mats with anchors at 12 in. intervals, backfill and compact soil.
- Unroll center strip of matting upstream. Stop at next check slot or terminal anchor trench. Unroll adjacent mats upstream in similar fashion, maintaining a 3 in. overlap.
- Fold and secure all rolls of matting snugly into all transverse check slots. Lay mat in the bottom of the slot then fold back against itself. Anchor through both layers of mat at 12 in. intervals, then backfill and compact soil. Continue rolling all mat widths upstream to the next check slot or terminal anchor trench.
- Alternate method for non-critical installations: Place two rows of anchors on 6 in. centers at 25 to 30 ft. intervals in lieu of excavated check slots.
- Staple shingled lap spliced ends a minimum of 12 in. apart on 12 in. intervals.
- Place edges of outside mats in previously excavated longitudinal slots; anchor using prescribed staple pattern, backfill, and compact soil.
- Anchor, fill, and compact upstream end of mat in a 12 in. by 6 in. terminal trench.

- Secure mat to ground surface using U-shaped wire staples, geotextile pins, or wooden stakes.
- Seed and fill turf reinforcement matting with soil, if specified.

Soil Filling (if specified for turf reinforcement)

- Always consult the manufacturer's recommendations for installation.
- Do not drive tracked or heavy equipment over mat.
- Avoid any traffic over matting if loose or wet soil conditions exist.
- Use shovels, rakes, or brooms for fine grading and touch up.
- Smooth out soil filling just exposing top netting of mat.

Temporary Soil Stabilization Removal

- Temporary soil stabilization removed from the site of the work must be disposed of if necessary.

Costs

Relatively high compared to other BMPs. Biodegradable materials: \$0.50 - \$0.57/yd². Permanent materials: \$3.00 - \$4.50/yd². Staples: \$0.04 - \$0.05/staple. Approximate costs for installed materials are shown below:

Rolled Erosion Control Products		Installed Cost per Acre
Biodegradable	Jute Mesh	\$6,500
	Curled Wood Fiber	\$10,500
	Straw	\$8,900
	Wood Fiber	\$8,900
	Coconut Fiber	\$13,000
	Coconut Fiber Mesh	\$31,200
	Straw Coconut Fiber	\$10,900
Non-Biodegradable	Plastic Netting	\$2,000
	Plastic Mesh	\$3,200
	Synthetic Fiber with Netting	\$34,800
	Bonded Synthetic Fibers	\$50,000
	Combination with Biodegradable	\$32,000

Source: Caltrans Guidance for Soil Stabilization for Temporary Slopes, Nov. 1999

Inspection and Maintenance

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season, and at two-week intervals during the non-rainy season.
- Inspect BMPs subject to non-stormwater discharges daily while non-stormwater discharges occur.

- Areas where erosion is evident shall be repaired and BMPs reapplied as soon as possible. Care should be exercised to minimize the damage to protected areas while making repairs, as any area damaged will require reapplication of BMPs.
- If washout or breakage occurs, re-install the material after repairing the damage to the slope or channel.
- Make sure matting is uniformly in contact with the soil.
- Check that all the lap joints are secure.
- Check that staples are flush with the ground.
- Check that disturbed areas are seeded.

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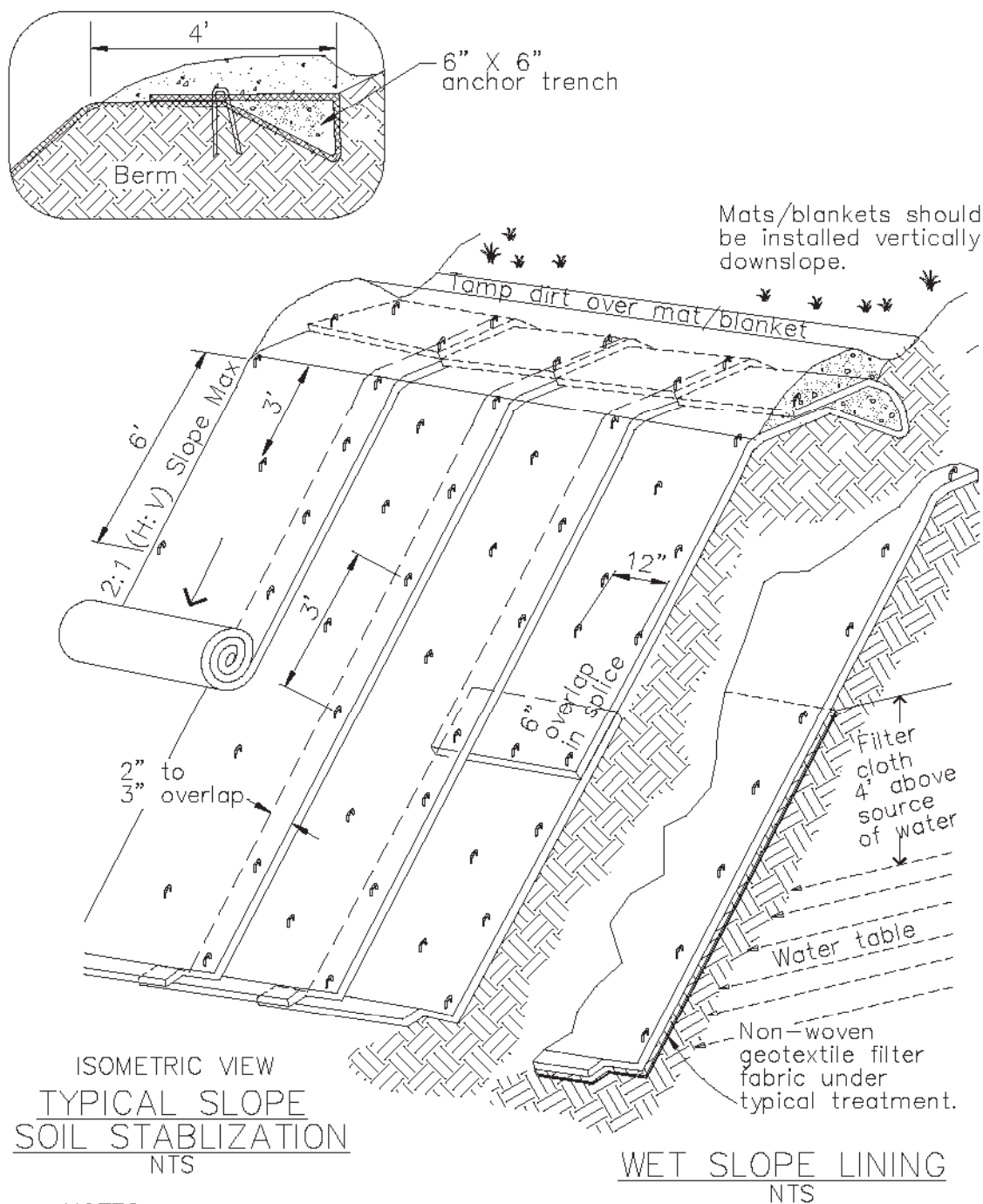
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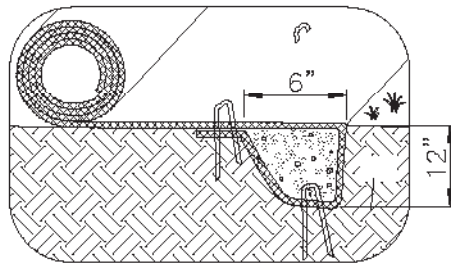
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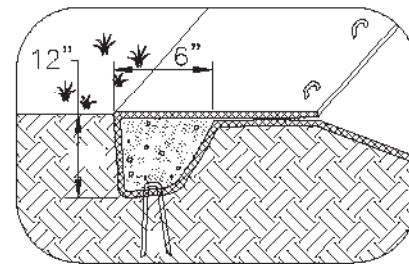
- NOTES:

1. Slope surface shall be free of rocks, clods, sticks and grass. Mats/blankets shall have good soil contact.
2. Lay blankets loosely and stake or staple to maintain direct contact with the soil. Do not stretch.
3. Install per manufacturer's recommendations

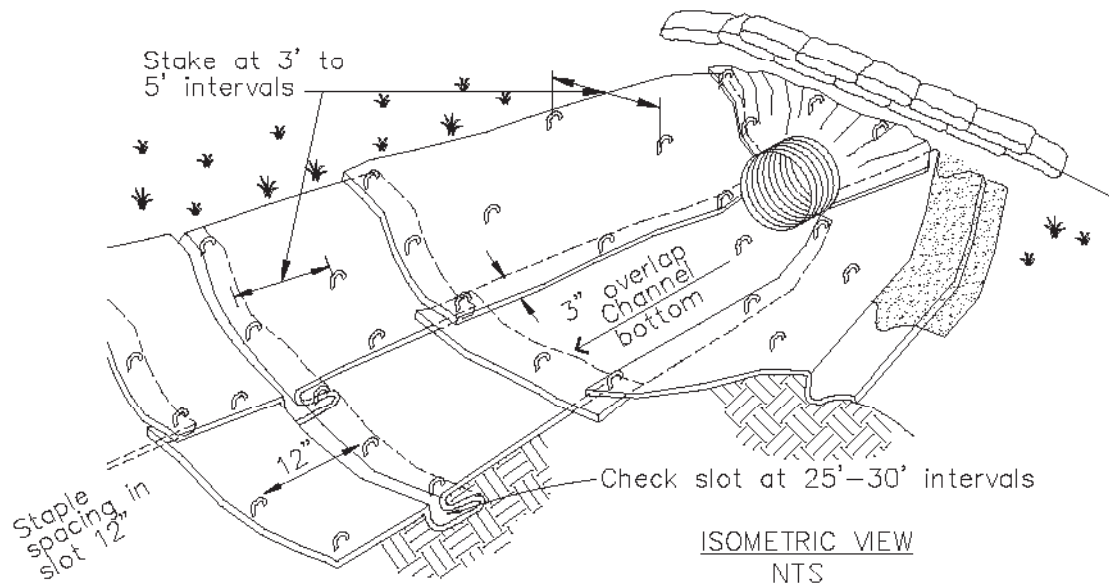
TYPICAL INSTALLATION DETAIL



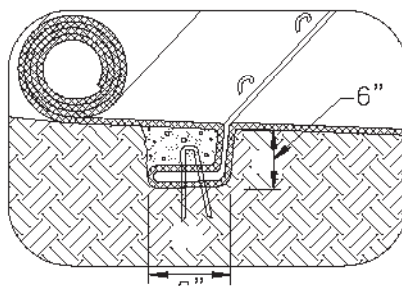
INITIAL CHANNEL ANCHOR TRENCH
NTS



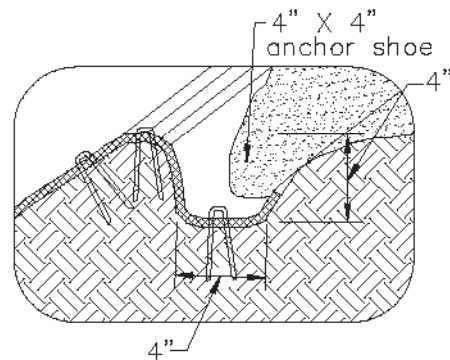
TERMINAL SLOPE AND CHANNEL
ANCHOR TRENCH
NTS



ISOMETRIC VIEW
NTS



INTERMITTENT CHECK SLOT
NTS

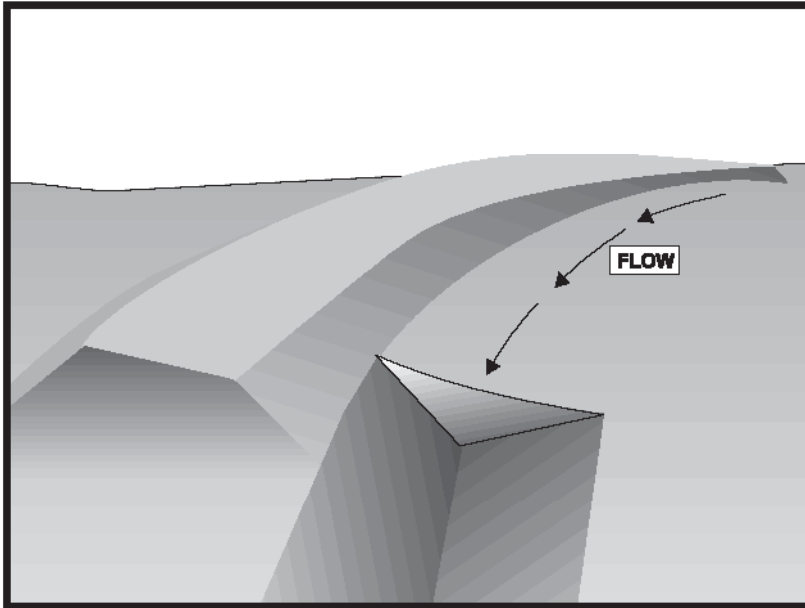


LONGITUDINAL ANCHOR TRENCH
NTS

NOTES:

1. Check slots to be constructed per manufacturers specifications.
2. Staking or stapling layout per manufacturers specifications.
3. Install per manufacturer's recommendations

TYPICAL INSTALLATION DETAIL



Description and Purpose

An earth dike is a temporary berm or ridge of compacted soil used to divert runoff or channel water to a desired location. A drainage swale is a shaped and sloped depression in the soil surface used to convey runoff to a desired location. Earth dikes and drainage swales are used to divert off site runoff around the construction site, divert runoff from stabilized areas and disturbed areas, and direct runoff into sediment basins or traps.

Suitable Applications

Earth dikes and drainage swales are suitable for use, individually or together, where runoff needs to be diverted from one area and conveyed to another.

- Earth dikes and drainage swales may be used:
 - To convey surface runoff down sloping land
 - To intercept and divert runoff to avoid sheet flow over sloped surfaces
 - To divert and direct runoff towards a stabilized watercourse, drainage pipe or channel
 - To intercept runoff from paved surfaces
 - Below steep grades where runoff begins to concentrate
 - Along roadways and facility improvements subject to flood drainage

Objectives

EC	Erosion Control	☒
SE	Sediment Control	
TR	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☐ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

None



EC-9 Earth Dikes and Drainage Swales

- At the top of slopes to divert runoff from adjacent or undisturbed slopes
- At bottom and mid slope locations to intercept sheet flow and convey concentrated flows
- Divert sediment laden runoff into sediment basins or traps

Limitations

Dikes should not be used for drainage areas greater than 10 acres or along slopes greater than 10 percent. For larger areas more permanent drainage structures should be built. All drainage structures should be built in compliance with local municipal requirements.

- Earth dikes may create more disturbed area on site and become barriers to construction equipment.
- Earth dikes must be stabilized immediately, which adds cost and maintenance concerns.
- Diverted stormwater may cause downstream flood damage.
- Dikes should not be constructed of soils that may be easily eroded.
- Regrading the site to remove the dike may add additional cost.
- Temporary drains and swales or any other diversion of runoff should not adversely impact upstream or downstream properties.
- Temporary drains and swales must conform to local floodplain management requirements.
- Earth dikes/drainage swales are not suitable as sediment trapping devices.
- It may be necessary to use other soil stabilization and sediment controls such as check dams, plastics, and blankets, to prevent scour and erosion in newly graded dikes, swales, and ditches.

Implementation

The temporary earth dike is a berm or ridge of compacted soil, located in such a manner as to divert stormwater to a sediment trapping device or a stabilized outlet, thereby reducing the potential for erosion and offsite sedimentation. Earth dikes can also be used to divert runoff from off site and from undisturbed areas away from disturbed areas and to divert sheet flows away from unprotected slopes.

An earth dike does not itself control erosion or remove sediment from runoff. A dike prevents erosion by directing runoff to an erosion control device such as a sediment trap or directing runoff away from an erodible area. Temporary diversion dikes should not adversely impact adjacent properties and must conform to local floodplain management regulations, and should not be used in areas with slopes steeper than 10%.

Slopes that are formed during cut and fill operations should be protected from erosion by runoff. A combination of a temporary drainage swale and an earth dike at the top of a slope can divert runoff to a location where it can be brought to the bottom of the slope (see EC-11, Slope Drains). A combination dike and swale is easily constructed by a single pass of a bulldozer or grader and

compacted by a second pass of the tracks or wheels over the ridge. Diversion structures should be installed when the site is initially graded and remain in place until post construction BMPs are installed and the slopes are stabilized.

Diversion practices concentrate surface runoff, increasing its velocity and erosive force. Thus, the flow out of the drain or swale must be directed onto a stabilized area or into a grade stabilization structure. If significant erosion will occur, a swale should be stabilized using vegetation, chemical treatment, rock rip-rap, matting, or other physical means of stabilization. Any drain or swale that conveys sediment laden runoff must be diverted into a sediment basin or trap before it is discharged from the site.

General

- Care must be applied to correctly size and locate earth dikes, drainage swales. Excessively steep, unlined dikes, and swales are subject to erosion and gully formation.
- Conveyances should be stabilized.
- Use a lined ditch for high flow velocities.
- Select flow velocity based on careful evaluation of the risks due to erosion of the measure, soil types, overtopping, flow backups, washout, and drainage flow patterns for each project site.
- Compact any fills to prevent unequal settlement.
- Do not divert runoff onto other property without securing written authorization from the property owner.
- When possible, install and utilize permanent dikes, swales, and ditches early in the construction process.
- Provide stabilized outlets.

Earth Dikes

Temporary earth dikes are a practical, inexpensive BMP used to divert stormwater runoff. Temporary diversion dikes should be installed in the following manner:

- All dikes should be compacted by earth moving equipment.
- All dikes should have positive drainage to an outlet.
- All dikes should have 2:1 or flatter side slopes, 18 in. minimum height, and a minimum top width of 24 in. Wide top widths and flat slopes are usually needed at crossings for construction traffic.
- The outlet from the earth dike must function with a minimum of erosion. Runoff should be conveyed to a sediment trapping device such as a Sediment Trap (SE-3) or Sediment Basin (SE-2) when either the dike channel or the drainage area above the dike are not adequately stabilized.

EC-9 Earth Dikes and Drainage Swales

- Temporary stabilization may be achieved using seed and mulching for slopes less than 5% and either rip-rap or sod for slopes in excess of 5%. In either case, stabilization of the earth dike should be completed immediately after construction or prior to the first rain.
- If riprap is used to stabilize the channel formed along the toe of the dike, the following typical specifications apply:

Channel Grade	Riprap Stabilization
0.5-1.0%	4 in. Rock
1.1-2.0%	6 in. Rock
2.1-4.0%	8 in. Rock
4.1-5.0%	8 in. -12 in. Riprap

- The stone riprap, recycled concrete, etc. used for stabilization should be pressed into the soil with construction equipment.
- Filter cloth may be used to cover dikes in use for long periods.
- Construction activity on the earth dike should be kept to a minimum.

Drainage Swales

Drainage swales are only effective if they are properly installed. Swales are more effective than dikes because they tend to be more stable. The combination of a swale with a dike on the downhill side is the most cost effective diversion.

Standard engineering design criteria for small open channel and closed conveyance systems should be used (see the local drainage design manual). Unless local drainage design criteria state otherwise, drainage swales should be designed as follows:

- No more than 5 acres may drain to a temporary drainage swale.
- Place drainage swales above or below, not on, a cut or fill slope.
- Swale bottom width should be at least 2 ft
- Depth of the swale should be at least 18 in.
- Side slopes should be 2:1 or flatter.
- Drainage or swales should be laid at a grade of at least 1 percent, but not more than 15 percent.
- The swale must not be overtopped by the peak discharge from a 10-year storm, irrespective of the design criteria stated above.
- Remove all trees, stumps, obstructions, and other objectionable material from the swale when it is built.
- Compact any fill material along the path of the swale.

- Stabilize all swales immediately. Seed and mulch swales at a slope of less than 5 percent, and use rip-rap or sod for swales with a slope between 5 and 15 percent. For temporary swales, geotextiles and mats (EC-7) may provide immediate stabilization.
- Irrigation may be required to establish sufficient vegetation to prevent erosion.
- Do not operate construction vehicles across a swale unless a stabilized crossing is provided.
- Permanent drainage facilities must be designed by a professional engineer (see the local drainage design criteria for proper design).
- At a minimum, the drainage swale should conform to predevelopment drainage patterns and capacities.
- Construct the drainage swale with a positive grade to a stabilized outlet.
- Provide erosion protection or energy dissipation measures if the flow out of the drainage swale can reach an erosive velocity.

Costs

- Cost ranges from \$15 to \$55 per ft for both earthwork and stabilization and depends on availability of material, site location, and access.
- Small dikes: \$2.50 - \$6.50/linear ft; Large dikes: \$2.50/yd³.
- The cost of a drainage swale increases with drainage area and slope. Typical swales for controlling internal erosion are inexpensive, as they are quickly formed during routine earthwork.

Inspection and Maintenance

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Inspect BMPs subject to non-stormwater discharges daily while non-stormwater discharges occur.
- Inspect ditches and berms for washouts. Replace lost riprap, damaged linings or soil stabilizers as needed.
- Inspect channel linings, embankments, and beds of ditches and berms for erosion and accumulation of debris and sediment. Remove debris and sediment and repair linings and embankments as needed.
- Temporary conveyances should be completely removed as soon as the surrounding drainage area has been stabilized or at the completion of construction

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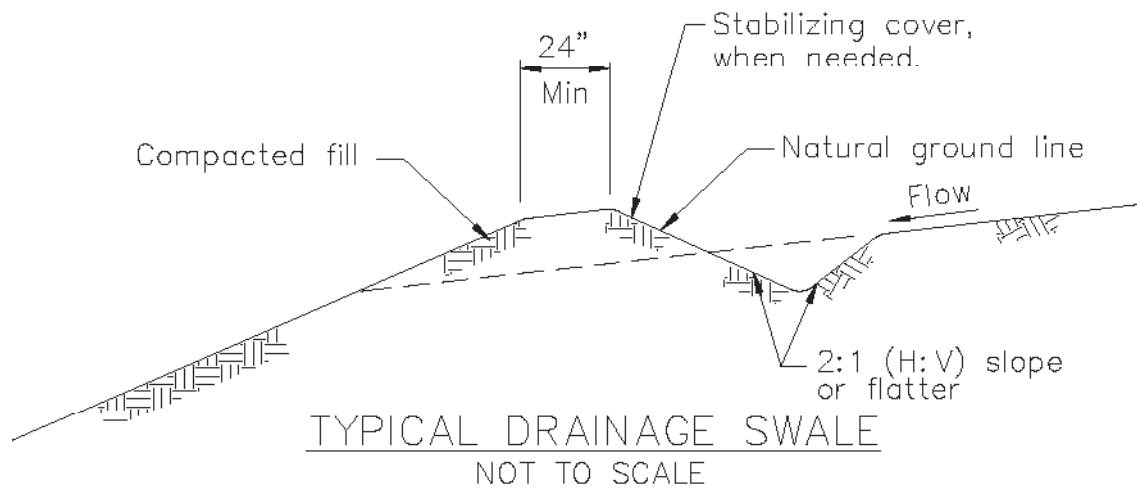
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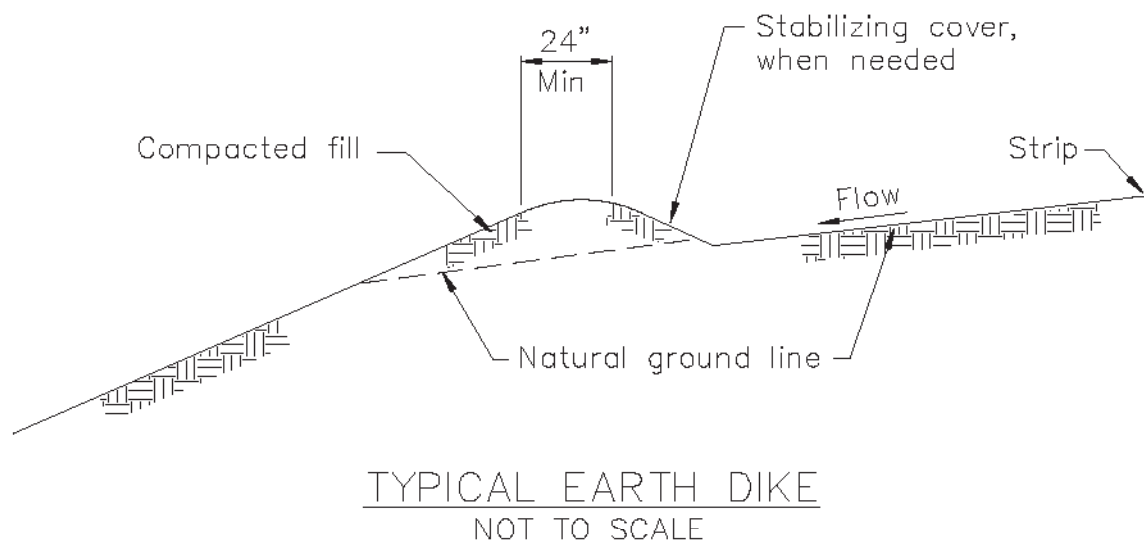
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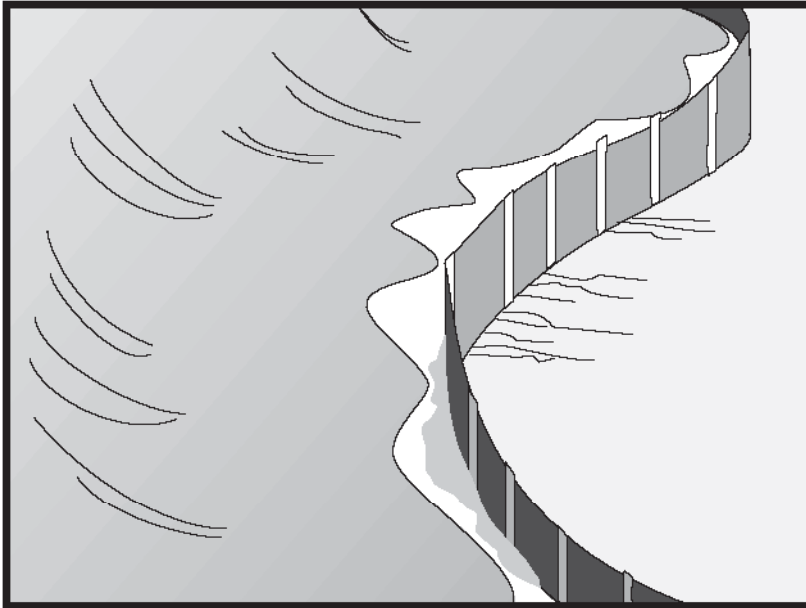
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NOTES:

1. Stabilize inlet, outlets and slopes.
2. Properly compact the subgrade.





Description and Purpose

A silt fence is made of a filter fabric that has been entrenched, attached to supporting poles, and sometimes backed by a plastic or wire mesh for support. The silt fence detains sediment-laden water, promoting sedimentation behind the fence.

Suitable Applications

Silt fences are suitable for perimeter control, placed below areas where sheet flows discharge from the site. They should also be used as interior controls below disturbed areas where runoff may occur in the form of sheet and rill erosion. Silt fences are generally ineffective in locations where the flow is concentrated and are only applicable for sheet or overland flows. Silt fences are most effective when used in combination with erosion controls. Suitable applications include:

- Along the perimeter of a project.
- Below the toe or down slope of exposed and erodible slopes.
- Along streams and channels.
- Around temporary spoil areas and stockpiles.
- Below other small cleared areas.

Limitations

- Do not use in streams, channels, drain inlets, or anywhere flow is concentrated.

Objectives

EC	Erosion Control	☒
SE	Sediment Control	
TR	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

- SE-5 Fiber Rolls
- SE-6 Gravel Bag Berm
- SE-8 Sandbag Barrier
- SE-9 Straw Bale Barrier



- Do not use in locations where ponded water may cause flooding.
- Do not place fence on a slope, or across any contour line. If not installed at the same elevation throughout, silt fences will create erosion.
- Filter fences will create a temporary sedimentation pond on the upstream side of the fence and may cause temporary flooding. Fences not constructed on a level contour will be overtopped by concentrated flow resulting in failure of the filter fence.
- Improperly installed fences are subject to failure from undercutting, overlapping, or collapsing.
 - Not effective unless trenched and keyed in.
 - Not intended for use as mid-slope protection on slopes greater than 4:1 (H:V).
 - Do not allow water depth to exceed 1.5 ft at any point.

Implementation

General

A silt fence is a temporary sediment barrier consisting of filter fabric stretched across and attached to supporting posts, entrenched, and, depending upon the strength of fabric used, supported with plastic or wire mesh fence. Silt fences trap sediment by intercepting and detaining small amounts of sediment-laden runoff from disturbed areas in order to promote sedimentation behind the fence.

Silt fences are preferable to straw bale barriers in many cases. Laboratory work at the Virginia Highway and Transportation Research Council has shown that silt fences can trap a much higher percentage of suspended sediments than can straw bales. While the failure rate of silt fences is lower than that of straw bale barriers, there are many instances where silt fences have been improperly installed. The following layout and installation guidance can improve performance and should be followed:

- Use principally in areas where sheet flow occurs.
- Don't use in streams, channels, or anywhere flow is concentrated. Don't use silt fences to divert flow.
- Don't use below slopes subject to creep, slumping, or landslides.
- Select filter fabric that retains 85% of soil by weight, based on sieve analysis, but that is not finer than an equivalent opening size of 70.
- Install along a level contour, so water does not pond more than 1.5 ft at any point along the silt fence.
- The maximum length of slope draining to any point along the silt fence should be 200 ft or less.
- The maximum slope perpendicular to the fence line should be 1:1.

- Provide sufficient room for runoff to pond behind the fence and to allow sediment removal equipment to pass between the silt fence and toes of slopes or other obstructions. About 1200 ft² of ponding area should be provided for every acre draining to the fence.
- Turn the ends of the filter fence uphill to prevent stormwater from flowing around the fence.
- Leave an undisturbed or stabilized area immediately down slope from the fence where feasible.
- Silt fences should remain in place until the disturbed area is permanently stabilized.

Design and Layout

Selection of a filter fabric is based on soil conditions at the construction site (which affect the equivalent opening size (EOS) fabric specification) and characteristics of the support fence (which affect the choice of tensile strength). The designer should specify a filter fabric that retains the soil found on the construction site yet that it has openings large enough to permit drainage and prevent clogging. The following criteria is recommended for selection of the equivalent opening size:

1. If 50 percent or less of the soil, by weight, will pass the U.S. Standard Sieve No. 200, select the EOS to retain 85 % of the soil. The EOS should not be finer than EOS 70.
2. For all other soil types, the EOS should be no larger than the openings in the U.S. Standard Sieve No. 70 except where direct discharge to a stream, lake, or wetland will occur, then the EOS should be no larger than Standard Sieve No. 100.

To reduce the chance of clogging, it is preferable to specify a fabric with openings as large as allowed by the criteria. No fabric should be specified with an EOS smaller than U.S. Standard Sieve No. 100. If 85% or more of a soil, by weight, passes through the openings in a No. 200 sieve, filter fabric should not be used. Most of the particles in such a soil would not be retained if the EOS was too large and they would clog the fabric quickly if the EOS were small enough to capture the soil.

The fence should be supported by a plastic or wire mesh if the fabric selected does not have sufficient strength and bursting strength characteristics for the planned application (as recommended by the fabric manufacturer). Filter fabric material should contain ultraviolet inhibitors and stabilizers to provide a minimum of six months of expected usable construction life at a temperature range of 0 °F to 120 °F.

- Layout in accordance with attached figures.
- For slopes steeper than 2:1 (H:V) and that contain a high number of rocks or large dirt clods that tend to dislodge, it may be necessary to install additional protection immediately adjacent to the bottom of the slope, prior to installing silt fence. Additional protection may be a chain link fence or a cable fence.
- For slopes adjacent to sensitive receiving waters or Environmentally Sensitive Areas (ESAs), silt fence should be used in conjunction with erosion control BMPs.

Materials

- Silt fence fabric should be woven polypropylene with a minimum width of 36 in. and a minimum tensile strength of 100 lb force. The fabric should conform to the requirements in ASTM designation D4632 and should have an integral reinforcement layer. The reinforcement layer should be a polypropylene, or equivalent, net provided by the manufacturer. The permittivity of the fabric should be between 0.1 sec^{-1} and 0.15 sec^{-1} in conformance with the requirements in ASTM designation D4491.
- Wood stakes should be commercial quality lumber of the size and shape shown on the plans. Each stake should be free from decay, splits or cracks longer than the thickness of the stake or other defects that would weaken the stakes and cause the stakes to be structurally unsuitable.
- Staples used to fasten the fence fabric to the stakes should be not less than 1.75 in. long and should be fabricated from 15 gauge or heavier wire. The wire used to fasten the tops of the stakes together when joining two sections of fence should be 9 gauge or heavier wire. Galvanizing of the fastening wire will not be required.
- There are new products that may use prefabricated plastic holders for the silt fence and use bar reinforcement instead of wood stakes. If bar reinforcement is used in lieu of wood stakes, use number four or greater bar. Provide end protection for any exposed bar reinforcement.

Installation Guidelines

Silt fences are to be constructed on a level contour. Sufficient area should exist behind the fence for ponding to occur without flooding or overtopping the fence.

- A trench should be excavated approximately 6 in. wide and 6 in. deep along the line the proposed silt fence.
- Bottom of the silt fence should be keyed-in a minimum of 12 in.
- Posts should be spaced a maximum of 6 ft apart and driven securely into the ground a minimum of 18 in. or 12 in. below the bottom of the trench.
- When standard strength filter fabric is used, a plastic or wire mesh support fence should be fastened securely to the upslope side of posts using heavy-duty wire staples at least 1 in. long. The mesh should extend into the trench. When extra-strength filter fabric and closer post spacing are used, the mesh support fence may be eliminated. Filter fabric should be purchased in a long roll, then cut to the length of the barrier. When joints are necessary, filter cloth should be spliced together only at a support post, with a minimum 6 in. overlap and both ends securely fastened to the post.
- The trench should be backfilled with compacted native material.
- Construct silt fences with a setback of at least 3 ft from the toe of a slope. Where a silt fence is determined to be not practicable due to specific site conditions, the silt fence may be constructed at the toe of the slope, but should be constructed as far from the toe of the slope as practicable. Silt fences close to the toe of the slope will be less effective and difficult to maintain.

- Construct the length of each reach so that the change in base elevation along the reach does not exceed $\frac{1}{3}$ the height of the barrier; in no case should the reach exceed 500 ft.

Costs

- Average annual cost for installation and maintenance (assumes 6 month useful life): \$7 per lineal foot (\$850 per drainage acre). Range of cost is \$3.50 - \$9.10 per lineal foot.

Inspection and Maintenance

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Repair undercut silt fences.
- Repair or replace split, torn, slumping, or weathered fabric. The lifespan of silt fence fabric is generally 5 to 8 months.
- Silt fences that are damaged and become unsuitable for the intended purpose should be removed from the site of work, disposed of, and replaced with new silt fence barriers.
- Sediment that accumulates in the BMP must be periodically removed in order to maintain BMP effectiveness. Sediment should be removed when the sediment accumulation reaches one-third of the barrier height. Sediment removed during maintenance may be incorporated into earthwork on the site or disposed at an appropriate location.
- Silt fences should be left in place until the upstream area is permanently stabilized. Until then, the silt fence must be inspected and maintained.
- Holes, depressions, or other ground disturbance caused by the removal of the silt fences should be backfilled and repaired.

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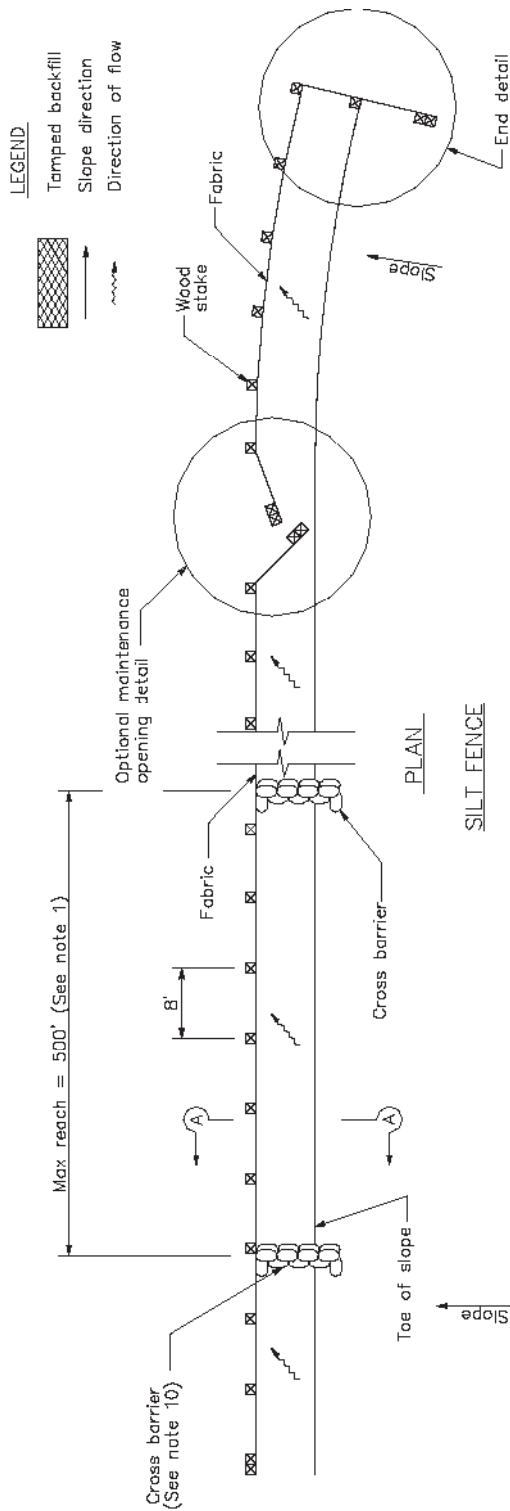
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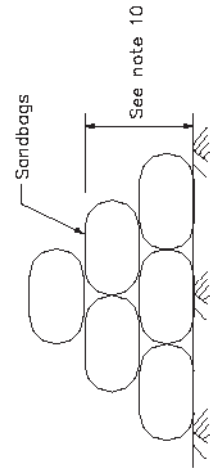
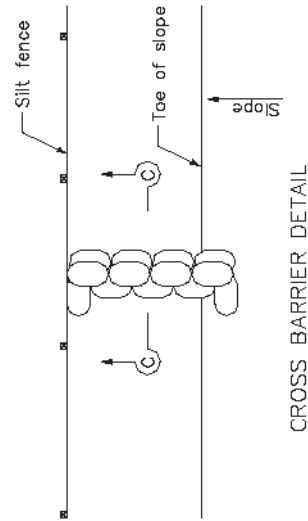
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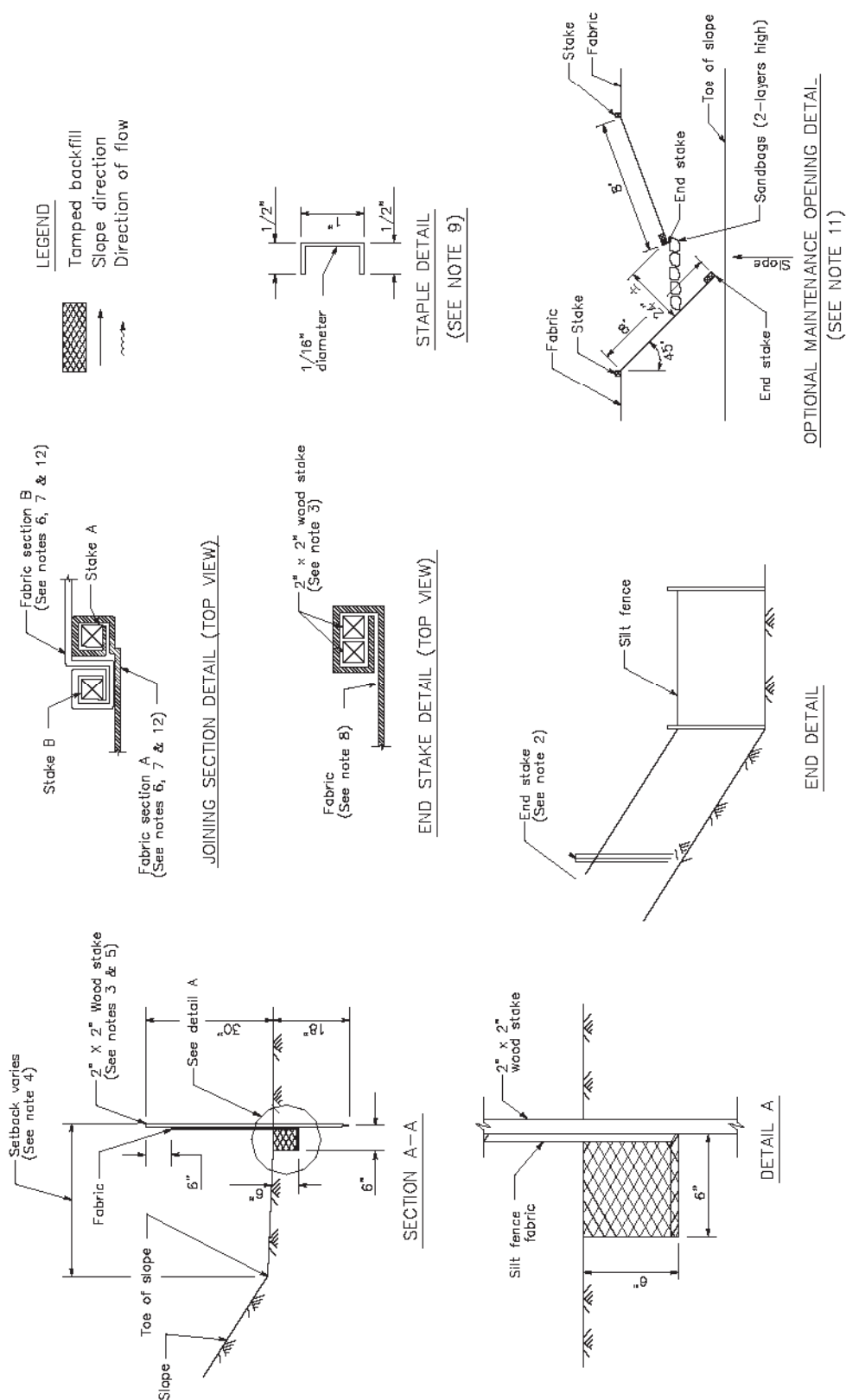
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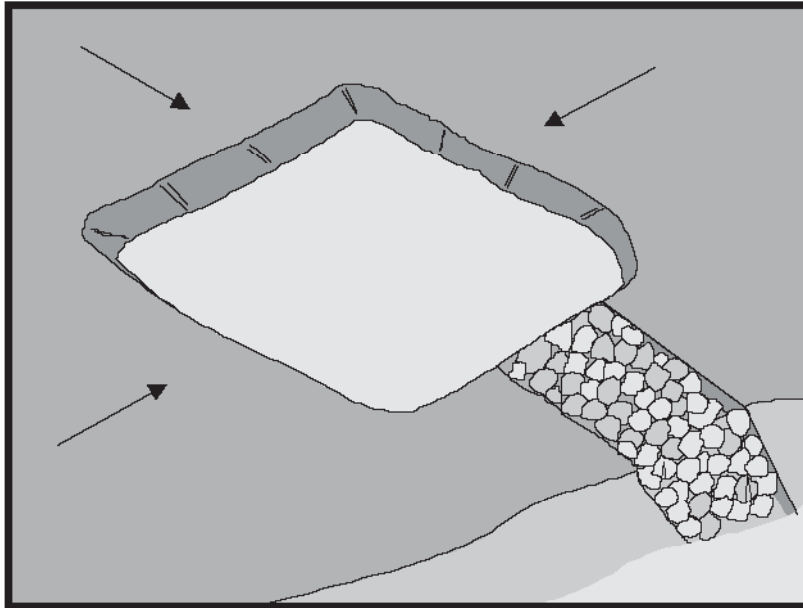


NOTES

1. Construct the length of each reach so that the change in base elevation along the reach does not exceed $1/3$ the height of the linear barrier, in no case shall the reach length exceed 500'.
2. The last 8'-0" of fence shall be turned up slope.
3. Stake dimensions are nominal.
4. Dimension may vary to fit field condition.
5. Stakes shall be spaced at 8'-0" maximum and shall be positioned on downstream side of fence.
6. Stakes to overlap and fence fabric to fold around each stake one full turn. Secure fabric to stake with 4 staples.
7. Stakes shall be driven tightly together to prevent potential flow-through of sediment at joint. The tops of the stakes shall be secured with wire.
8. For end stake, fence fabric shall be folded around two stakes one full turn and secured with 4 staples.
9. Minimum 4 staples per stake. Dimensions shown are typical.
10. Cross barriers shall be a minimum of $1/3$ and a maximum of $1/2$ the height of the linear barrier.
11. Maintenance openings shall be constructed in a manner to ensure sediment remains behind silt fence.
12. Joining sections shall not be placed at sump locations.
13. Sandbag rows and layers shall be offset to eliminate gaps.







Description and Purpose

A sediment trap is a containment area where sediment-laden runoff is temporarily detained under quiescent conditions, allowing sediment to settle out or before the runoff is discharged. Sediment traps are formed by excavating or constructing an earthen embankment across a waterway or low drainage area.

Suitable Applications

Sediment traps should be considered for use:

- At the perimeter of the site at locations where sediment-laden runoff is discharged offsite.
- At multiple locations within the project site where sediment control is needed.
- Around or upslope from storm drain inlet protection measures.
- Sediment traps may be used on construction projects where the drainage area is less than 5 acres. Traps would be placed where sediment-laden stormwater may enter a storm drain or watercourse. SE-2, Sediment Basins, must be used for drainage areas greater than 5 acres.
- As a supplemental control, sediment traps provide additional protection for a water body or for reducing sediment before it enters a drainage system.

Objectives

EC	Erosion Control	
SE	Sediment Control	☒
TR	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	☒
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

SE-2 Sediment Basin (for larger areas)



Limitations

- Requires large surface areas to permit infiltration and settling of sediment.
- Not appropriate for drainage areas greater than 5 acres.
- Only removes large and medium sized particles and requires upstream erosion control.
- Attractive and dangerous to children, requiring protective fencing.
- Conducive to vector production.
- Should not be located in live streams.

Implementation***Design***

A sediment trap is a small temporary ponding area, usually with a gravel outlet, formed by excavation or by construction of an earthen embankment. Its purpose is to collect and store sediment from sites cleared or graded during construction. It is intended for use on small drainage areas with no unusual drainage features and projected for a quick build-out time. It should help in removing coarse sediment from runoff. The trap is a temporary measure with a design life of approximately six months to one year and is to be maintained until the site area is permanently protected against erosion by vegetation and/or structures.

Sediment traps should be used only for small drainage areas. If the contributing drainage area is greater than 5 acres, refer to SE-2, Sediment Basins, or subdivide the catchment area into smaller drainage basins.

Sediment usually must be removed from the trap after each rainfall event. The SWPPP should detail how this sediment is to be disposed of, such as in fill areas onsite, or removal to an approved offsite dump. Sediment traps used as perimeter controls should be installed before any land disturbance takes place in the drainage area.

Sediment traps are usually small enough that a failure of the structure would not result in a loss of life, damage to home or buildings, or interruption in the use of public roads or utilities. However, sediment traps are attractive to children and can be dangerous. The following recommendations should be implemented to reduce risks:

- Install continuous fencing around the sediment trap or pond. Consult local ordinances regarding requirements for maintaining health and safety.
- Restrict basin side slopes to 3:1 or flatter.

Sediment trap size depends on the type of soil, size of the drainage area, and desired sediment removal efficiency (see SE-2, Sediment Basin). As a rule of thumb, the larger the basin volume the greater the sediment removal efficiency. Sizing criteria are typically established under the local grading ordinance or equivalent. The runoff volume from a 2-year storm is a common design criteria for a sediment trap. The sizing criteria below assume that this runoff volume is 0.042 acre-ft/acre (0.5 in. of runoff). While the climatic, topographic, and soil type extremes make it difficult to establish a statewide standard, the following criteria should trap moderate to high amounts of sediment in most areas of California:

- Locate sediment traps as near as practical to areas producing the sediment.
- Trap should be situated according to the following criteria: (1) by excavating a suitable area or where a low embankment can be constructed across a swale, (2) where failure would not cause loss of life or property damage, and (3) to provide access for maintenance, including sediment removal and sediment stockpiling in a protected area.
- Trap should be sized to accommodate a settling zone and sediment storage zone with recommended minimum volumes of 67 yd³/acre and 33 yd³/acre of contributing drainage area, respectively, based on 0.5 in. of runoff volume over a 24-hour period. In many cases, the size of an individual trap is limited by available space. Multiple traps or additional volume may be required to accommodate specific rainfall, soil, and site conditions.
- Traps with an impounding levee greater than 4.5 ft tall, measured from the lowest point to the impounding area to the highest point of the levee, and traps capable of impounding more than 35,000 ft³, should be designed by a Registered Civil Engineer. The design should include maintenance requirements, including sediment and vegetation removal, to ensure continuous function of the trap outlet and bypass structures.
- The outlet pipe or open spillway must be designed to convey anticipated peak flows.
- Use rock or vegetation to protect the trap outlets against erosion.
- Fencing should be provided to prevent unauthorized entry.

Installation

Sediment traps can be constructed by excavating a depression in the ground or creating an impoundment with a small embankment. Sediment traps should be installed outside the area being graded and should be built prior to the start of the grading activities or removal of vegetation. To minimize the area disturbed by them, sediment traps should be installed in natural depressions or in small swales or drainage ways. The following steps must be followed during installation:

- The area under the embankment must be cleared, grubbed, and stripped of any vegetation and root mat. The pool area should be cleared.
- The fill material for the embankment must be free of roots or other woody vegetation as well as oversized stones, rocks, organic material, or other objectionable material. The embankment may be compacted by traversing with equipment while it is being constructed.
- All cut-and-fill slopes should be 3:1 or flatter.
- When a riser is used, all pipe joints must be watertight.
- When a riser is used, at least the top two-thirds of the riser should be perforated with 0.5 in. diameter holes spaced 8 in. vertically and 10 to 12 in. horizontally. See SE-2, Sediment Basin.
- When an earth or stone outlet is used, the outlet crest elevation should be at least 1 ft below the top of the embankment.

- When crushed stone outlet is used, the crushed stone used in the outlet should meet AASHTO M43, size No. 2 or 24, or its equivalent such as MSHA No. 2. Gravel meeting the above gradation may be used if crushed stone is not available.

Costs

Average annual cost per installation and maintenance (18 month useful life) is \$0.73 per ft³ (\$1,300 per drainage acre). Maintenance costs are approximately 20% of installation costs.

Inspection and Maintenance

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Inspect outlet area for erosion and stabilize if required.
- Inspect trap banks for seepage and structural soundness, repair as needed.
- Inspect outlet structure and spillway for any damage or obstructions. Repair damage and remove obstructions as needed.
- Inspect fencing for damage and repair as needed.
- Inspect the sediment trap for area of standing water during every visit. Corrective measures should be taken if the BMP does not dewater completely in 72 hours or less to prevent vector production.
- Sediment that accumulates in the BMP must be periodically removed in order to maintain BMP effectiveness. Sediment should be removed when the sediment accumulation reaches one-third of the trap capacity. Sediment removed during maintenance may be incorporated into earthwork on the site or disposed of at an appropriate location.
- Remove vegetation from the sediment trap when first detected to prevent pools of standing water and subsequent vector production.
- BMPs that require dewatering shall be continuously attended while dewatering takes place. Dewatering BMPs shall be implemented at all times during dewatering activities.

References

Brown, W., and T. Schueler. The Economics of Stormwater BMPs in the Mid-Atlantic Region. Prepared for Chesapeake Research Consortium, Edgewater, MD, by the Center for Watershed Protection, Ellicott City, MD, 1997.

Draft – Sedimentation and Erosion Control, an Inventory of Current Practices, USEPA, April 1990.

Manual of Standards of Erosion and Sediment Control Measures, Association of Bay Area Governments, May 1995.

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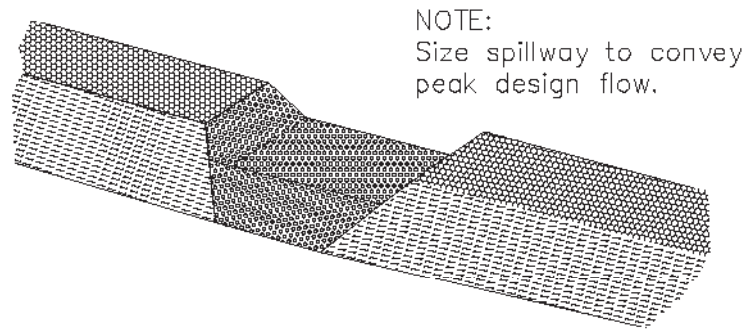
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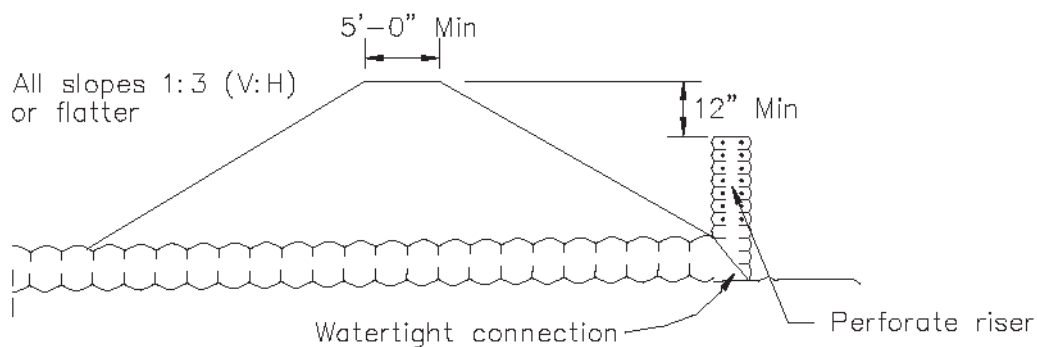
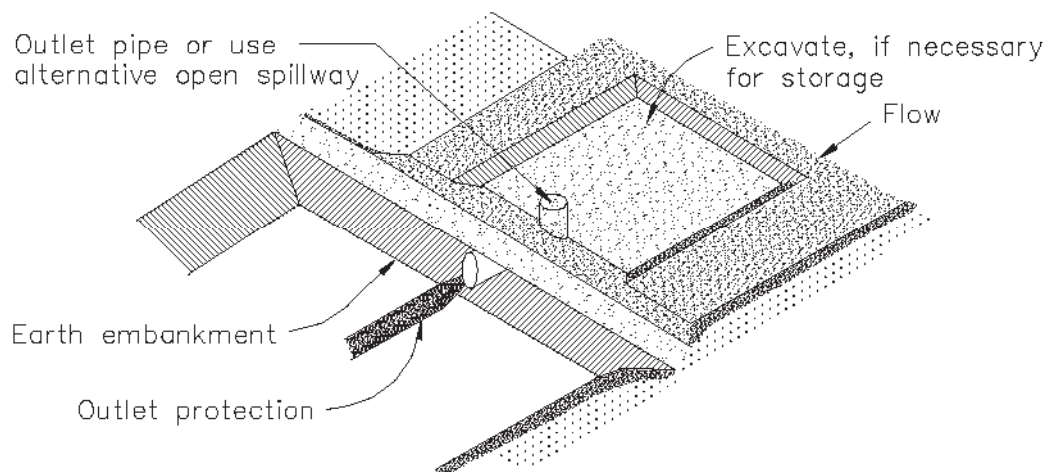
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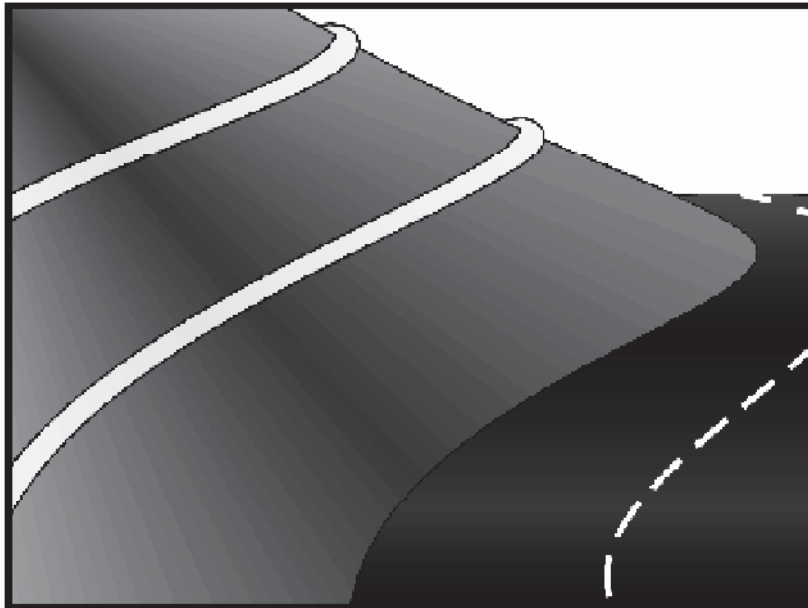


TYPICAL OPEN SPILLWAY



EMBANKMENT SECTION THRU RISER

TYPICAL SEDIMENT TRAP
NOT TO SCALE



Description and Purpose

A fiber roll consists of straw, flax, or other similar materials bound into a tight tubular roll. When fiber rolls are placed at the toe and on the face of slopes, they intercept runoff, reduce its flow velocity, release the runoff as sheet flow, and provide removal of sediment from the runoff. By interrupting the length of a slope, fiber rolls can also reduce erosion.

Suitable Applications

Fiber rolls may be suitable:

- Along the toe, top, face, and at grade breaks of exposed and erodible slopes to shorten slope length and spread runoff as sheet flow
- At the end of a downward slope where it transitions to a steeper slope
- Along the perimeter of a project
- As check dams in unlined ditches
- Down-slope of exposed soil areas
- Around temporary stockpiles

Limitations

- Fiber rolls are not effective unless trenched

Objectives

EC	Erosion Control	☒
SE	Sediment Control	☒
TR	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

- SE-1 Silt Fence
- SE-6 Gravel Bag Berm
- SE-8 Sandbag Barrier
- SE-9 Straw Bale Barrier



- Fiber rolls at the toe of slopes greater than 5:1 (H:V) should be a minimum of 20 in. diameter or installations achieving the same protection (i.e. stacked smaller diameter fiber rolls, etc.).
- Difficult to move once saturated.
- If not properly staked and trenched in, fiber rolls could be transported by high flows.
- Fiber rolls have a very limited sediment capture zone.
- Fiber rolls should not be used on slopes subject to creep, slumping, or landslide.

Implementation

Fiber Roll Materials

- Fiber rolls should be either prefabricated rolls or rolled tubes of erosion control blanket.

Assembly of Field Rolled Fiber Roll

- Roll length of erosion control blanket into a tube of minimum 8 in. diameter.
- Bind roll at each end and every 4 ft along length of roll with jute-type twine.

Installation

- Locate fiber rolls on level contours spaced as follows:
 - Slope inclination of 4:1 (H:V) or flatter: Fiber rolls should be placed at a maximum interval of 20 ft.
 - Slope inclination between 4:1 and 2:1 (H:V): Fiber Rolls should be placed at a maximum interval of 15 ft. (a closer spacing is more effective).
 - Slope inclination 2:1 (H:V) or greater: Fiber Rolls should be placed at a maximum interval of 10 ft. (a closer spacing is more effective).
- Turn the ends of the fiber roll up slope to prevent runoff from going around the roll.
- Stake fiber rolls into a 2 to 4 in. deep trench with a width equal to the diameter of the fiber roll.
 - Drive stakes at the end of each fiber roll and spaced 4 ft maximum on center.
 - Use wood stakes with a nominal classification of 0.75 by 0.75 in. and minimum length of 24 in.
- If more than one fiber roll is placed in a row, the rolls should be overlapped, not abutted.

Removal

- Fiber rolls are typically left in place.

- If fiber rolls are removed, collect and dispose of sediment accumulation, and fill and compact holes, trenches, depressions or any other ground disturbance to blend with adjacent ground.

Costs

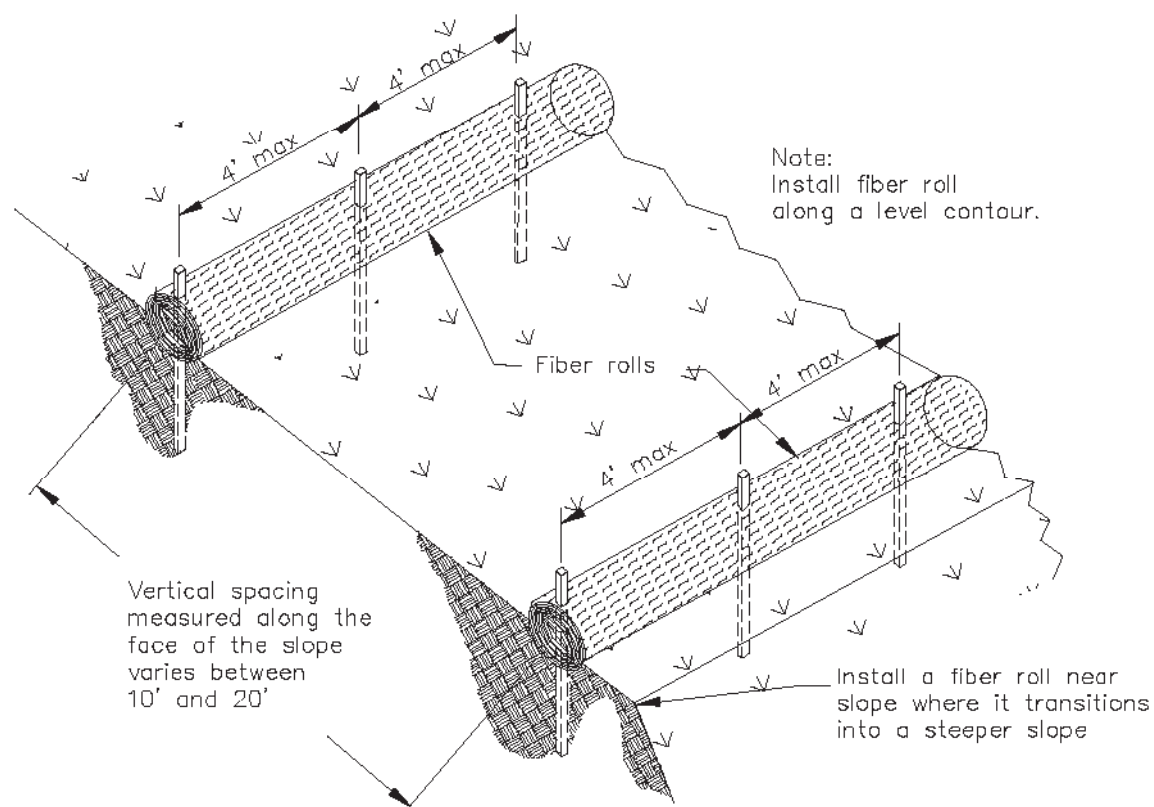
Material costs for fiber rolls range from \$20 - \$30 per 25 ft roll.

Inspection and Maintenance

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Repair or replace split, torn, unraveling, or slumping fiber rolls.
- If the fiber roll is used as a sediment capture device, or as an erosion control device to maintain sheet flows, sediment that accumulates in the BMP must be periodically removed in order to maintain BMP effectiveness. Sediment should be removed when sediment accumulation reaches one-half the designated sediment storage depth, usually one-half the distance between the top of the fiber roll and the adjacent ground surface. Sediment removed during maintenance may be incorporated into earthwork on the site or disposed at an appropriate location.
- If fiber rolls are used for erosion control, such as in a mini check dam, sediment removal should not be required as long as the system continues to control the grade. Sediment control BMPs will likely be required in conjunction with this type of application.

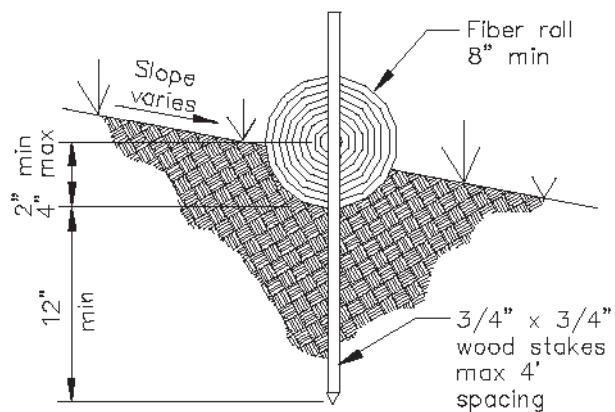
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Stormwater Quality Handbooks - Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.



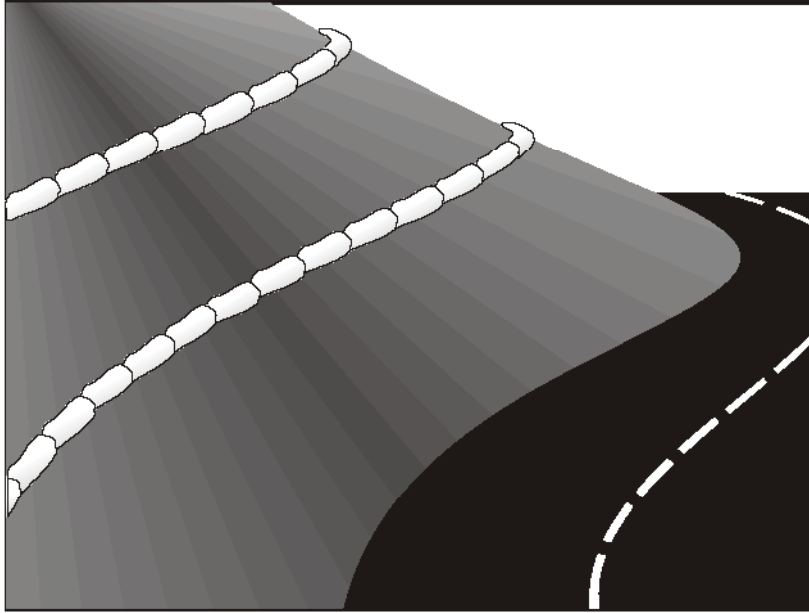
TYPICAL FIBER ROLL INSTALLATION

N.T.S.



ENTRENCHMENT DETAIL

N.T.S.



Description and Purpose

A gravel bag berm is a series of gravel-filled bags placed on a level contour to intercept sheet flows. Gravel bags pond sheet flow runoff, allowing sediment to settle out, and release runoff slowly as sheet flows, preventing erosion.

Suitable Applications

Gravel bag berms may be suitable:

- As a linear sediment control measure:
 - Below the toe of slopes and erodible slopes
 - As sediment traps at culvert/pipe outlets
 - Below other small cleared areas
 - Along the perimeter of a site
 - Down slope of exposed soil areas
 - Around temporary stockpiles and spoil areas
 - Parallel to a roadway to keep sediment off paved areas
 - Along streams and channels
- As linear erosion control measure:

Objectives

EC	Erosion Control	☒
SE	Sediment Control	☒
TR	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

- SE-1 Silt Fence
- SE-5 Fiber Roll
- SE-8 Sandbag Barrier
- SE-9 Straw Bale Barrier



- Along the face and at grade breaks of exposed and erodible slopes to shorten slope length and spread runoff as sheet flow
- At the top of slopes to divert runoff away from disturbed slopes
- As check dams across mildly sloped construction roads

Limitations

- Gravel berms may be difficult to remove.
- Removal problems limit their usefulness in landscaped areas.
- Gravel bag berm may not be appropriate for drainage areas greater than 5 acres.
- Runoff will pond upstream of the filter, possibly causing flooding if sufficient space does not exist.
- Degraded gravel bags may rupture when removed, spilling contents.
- Installation can be labor intensive.
- Berms may have limited durability for long-term projects.
- When used to detain concentrated flows, maintenance requirements increase.

Implementation***General***

A gravel bag berm consists of a row of open graded gravel-filled bags placed on a level contour. When appropriately placed, a gravel bag berm intercepts and slows sheet flow runoff, causing temporary ponding. The temporary ponding provides quiescent conditions allowing sediment to settle. The open graded gravel in the bags is porous, which allows the ponded runoff to flow slowly through the bags, releasing the runoff as sheet flows. Gravel bag berms also interrupt the slope length and thereby reduce erosion by reducing the tendency of sheet flows to concentrate into rivulets, which erode rills, and ultimately gullies, into disturbed, sloped soils. Gravel bag berms are similar to sand bag barriers, but are more porous.

Design and Layout

- Locate gravel bag berms on level contours.
 - Slopes between 20:1 and 2:1 (H:V): Gravel bags should be placed at a maximum interval of 50 ft (a closer spacing is more effective), with the first row near the slope toe.
 - Slopes 2:1 (H:V) or steeper: Gravel bags should be placed at a maximum interval of 25 ft (a closer spacing is more effective), with the first row placed the slope toe.
- Turn the ends of the gravel bag barriers up slope to prevent runoff from going around the berm.
- Allow sufficient space up slope from the gravel bag berm to allow ponding, and to provide room for sediment storage.

- For installation near the toe of the slope, consider moving the gravel bag barriers away from the slope toe to facilitate cleaning. To prevent flows behind the barrier, bags can be placed perpendicular to a berm to serve as cross barriers.
- Drainage area should not exceed 5 acres.
- In Non-Traffic Areas:
 - Height = 18 in. maximum
 - Top width = 24 in. minimum for three or more layer construction
 - Top width = 12 in. minimum for one or two layer construction
 - Side slopes = 2:1 or flatter
- In Construction Traffic Areas:
 - Height = 12 in. maximum
 - Top width = 24 in. minimum for three or more layer construction.
 - Top width = 12 in. minimum for one or two layer construction.
 - Side slopes = 2:1 or flatter.
- Butt ends of bags tightly
- On multiple row, or multiple layer construction, overlap butt joints of adjacent row and row beneath.
- Use a pyramid approach when stacking bags.

Materials

- **Bag Material:** Bags should be woven polypropylene, polyethylene or polyamide fabric or burlap, minimum unit weight of 4 ounces/yd², Mullen burst strength exceeding 300 lb/in² in conformance with the requirements in ASTM designation D3786, and ultraviolet stability exceeding 70% in conformance with the requirements in ASTM designation D4355.
- **Bag Size:** Each gravel-filled bag should have a length of 18 in., width of 12 in., thickness of 3 in., and mass of approximately 33 lbs. Bag dimensions are nominal, and may vary based on locally available materials.
- **Fill Material:** Fill material should be 0.5 to 1 in. Class 2 aggregate base, clean and free from clay, organic matter, and other deleterious material, or other suitable open graded, non-cohesive, porous gravel.

Costs

Gravel filter: Expensive, since off-site materials, hand construction, and demolition/removal are usually required. Material costs for gravel bags are average of \$2.50 per empty gravel bag. Gravel costs range from \$20-\$35 per yd³.

Inspection and Maintenance

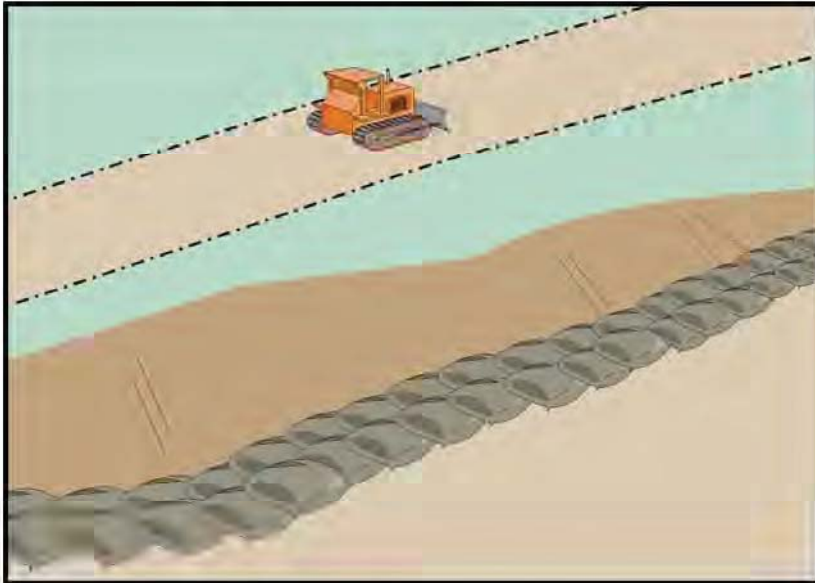
- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Gravel bags exposed to sunlight will need to be replaced every two to three months due to degrading of the bags.
- Reshape or replace gravel bags as needed.
- Repair washouts or other damage as needed.
- Sediment that accumulates in the BMP must be periodically removed in order to maintain BMP effectiveness. Sediment should be removed when the sediment accumulation reaches one-third of the barrier height. Sediment removed during maintenance may be incorporated into earthwork on the site or disposed at an appropriate location.
- Remove gravel bag berms when no longer needed. Remove sediment accumulation and clean, re-grade, and stabilize the area. Removed sediment should be incorporated in the project or disposed of.

References

Handbook of Steel Drainage and Highway Construction, American Iron and Steel Institute, 1983.

Stormwater Quality Handbooks - Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.

Stormwater Pollution Plan Handbook, First Edition, State of California, Department of Transportation Division of New Technology, Materials and Research, October 1992.



Objectives

EC	Erosion Control	☒
SE	Sediment Control	☒
TR	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Description and Purpose

A sandbag barrier is a series of sand-filled bags placed on a level contour to intercept sheet flows. Sandbag barriers pond sheet flow runoff, allowing sediment to settle out.

Suitable Applications

Sandbag barriers may be suitable:

- As a linear sediment control measure:
 - Below the toe of slopes and erodible slopes
 - As sediment traps at culvert/pipe outlets
 - Below other small cleared areas
 - Along the perimeter of a site
 - Down slope of exposed soil areas
 - Around temporary stockpiles and spoil areas
 - Parallel to a roadway to keep sediment off paved areas
 - Along streams and channels
- As linear erosion control measure:
 - Along the face and at grade breaks of exposed and erodible slopes to shorten slope length and spread runoff as sheet flow

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

- SE-1 Silt Fence
- SE-5 Fiber Rolls
- SE-6 Gravel Bag Berm
- SE-9 Straw Bale Barrier



- At the top of slopes to divert runoff away from disturbed slopes
- As check dams across mildly sloped construction roads

Limitations

- It is necessary to limit the drainage area upstream of the barrier to 5 acres.
- Degraded sandbags may rupture when removed, spilling sand.
- Installation can be labor intensive.
- Barriers may have limited durability for long-term projects.
- When used to detain concentrated flows, maintenance requirements increase.
- Burlap should not be used for sandbags.

Implementation***General***

A sandbag barrier consists of a row of sand-filled bags placed on a level contour. When appropriately placed, a sandbag barrier intercepts and slows sheet flow runoff, causing temporary ponding. The temporary ponding provides quiescent conditions allowing sediment to settle. While the sand-filled bags are porous, the fine sand tends to quickly plug with sediment, limiting the rate of flow through the barrier. If a porous barrier is desired, consider SE-1, Silt Fence, SE-5, Fiber Rolls, SE-6, Gravel Bag Berms, or SE-9, Straw Bale Barriers. Sandbag barriers also interrupt the slope length and thereby reduce erosion by reducing the tendency of sheet flows to concentrate into rivulets which erode rills, and ultimately gullies, into disturbed, sloped soils. Sandbag barriers are similar to ground bag berms, but less porous.

Design and Layout

- Locate sandbag barriers on a level contour.
 - Slopes between 20:1 and 2:1 (H:V): Sandbags should be placed at a maximum interval of 50 ft (a closer spacing is more effective), with the first row near the slope toe.
 - Slopes 2:1 (H:V) or steeper: Sandbags should be placed at a maximum interval of 25 ft (a closer spacing is more effective), with the first row placed near the slope toe.
- Turn the ends of the sandbag barrier up slope to prevent runoff from going around the barrier.
- Allow sufficient space up slope from the barrier to allow ponding, and to provide room for sediment storage.
- For installation near the toe of the slope, consider moving the barrier away from the slope toe to facilitate cleaning. To prevent flow behind the barrier, sandbags can be placed perpendicular to the barrier to serve as cross barriers.
- Drainage area should not exceed 5 acres.

- Stack sandbags at least three bags high.
- Butt ends of bags tightly.
- Overlapp butt joints of row beneath with each successive row.
- Use a pyramid approach when stacking bags.
- In non-traffic areas
 - Height = 18 in. maximum
 - Top width = 24 in. minimum for three or more layer construction
 - Side slope = 2:1 or flatter
- In construction traffic areas
 - Height = 12 in. maximum
 - Top width = 24 in. minimum for three or more layer construction.
 - Side slopes = 2:1 or flatter.

Materials

- **Sandbag Material:** Sandbag should be woven polypropylene, polyethylene or polyamide fabric, minimum unit weight of 4 ounces/yd², Mullen burst strength exceeding 300 lb/in² in conformance with the requirements in ASTM designation D3786, and ultraviolet stability exceeding 70% in conformance with the requirements in ASTM designation D4355. Use of burlap may not acceptable in some jurisdictions.
- **Sandbag Size:** Each sand-filled bag should have a length of 18 in., width of 12 in., thickness of 3 in., and mass of approximately 33 lbs. Bag dimensions are nominal, and may vary based on locally available materials.
- **Fill Material:** All sandbag fill material should be non-cohesive, Class 1 or Class 2 permeable material free from clay and deleterious material.

Costs

Sandbag barriers are more costly, but typically have a longer useful life than other barriers. Empty sandbags cost \$0.25 - \$0.75. Average cost of fill material is \$8 per yd³. Pre-filled sandbags are more expensive at \$1.50 - \$2.00 per bag.

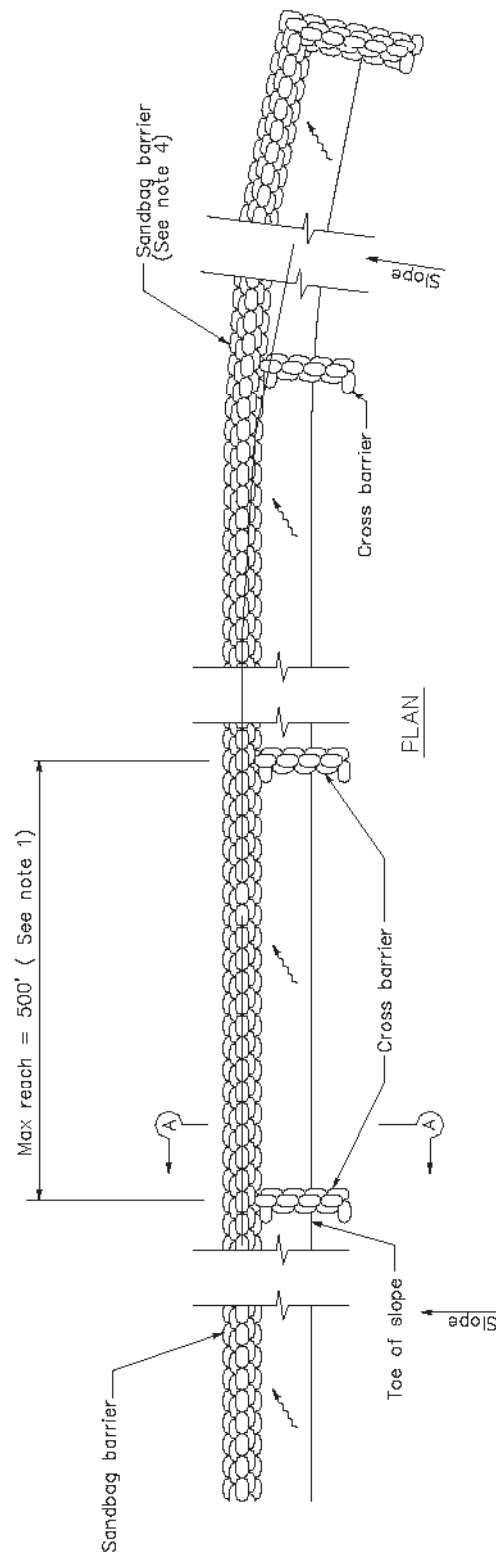
Inspection and Maintenance

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Sandbags exposed to sunlight will need to be replaced every two to three months due to degradation of the bags.
- Reshape or replace sandbags as needed.

- Repair washouts or other damage as needed.
- Sediment that accumulates in the BMP must be periodically removed in order to maintain BMP effectiveness. Sediment should be removed when the sediment accumulation reaches one-third of the barrier height. Sediment removed during maintenance may be incorporated into earthwork on the site or disposed at an appropriate location.
- Remove sandbags when no longer needed. Remove sediment accumulation, and clean, re-grade, and stabilize the area.

References

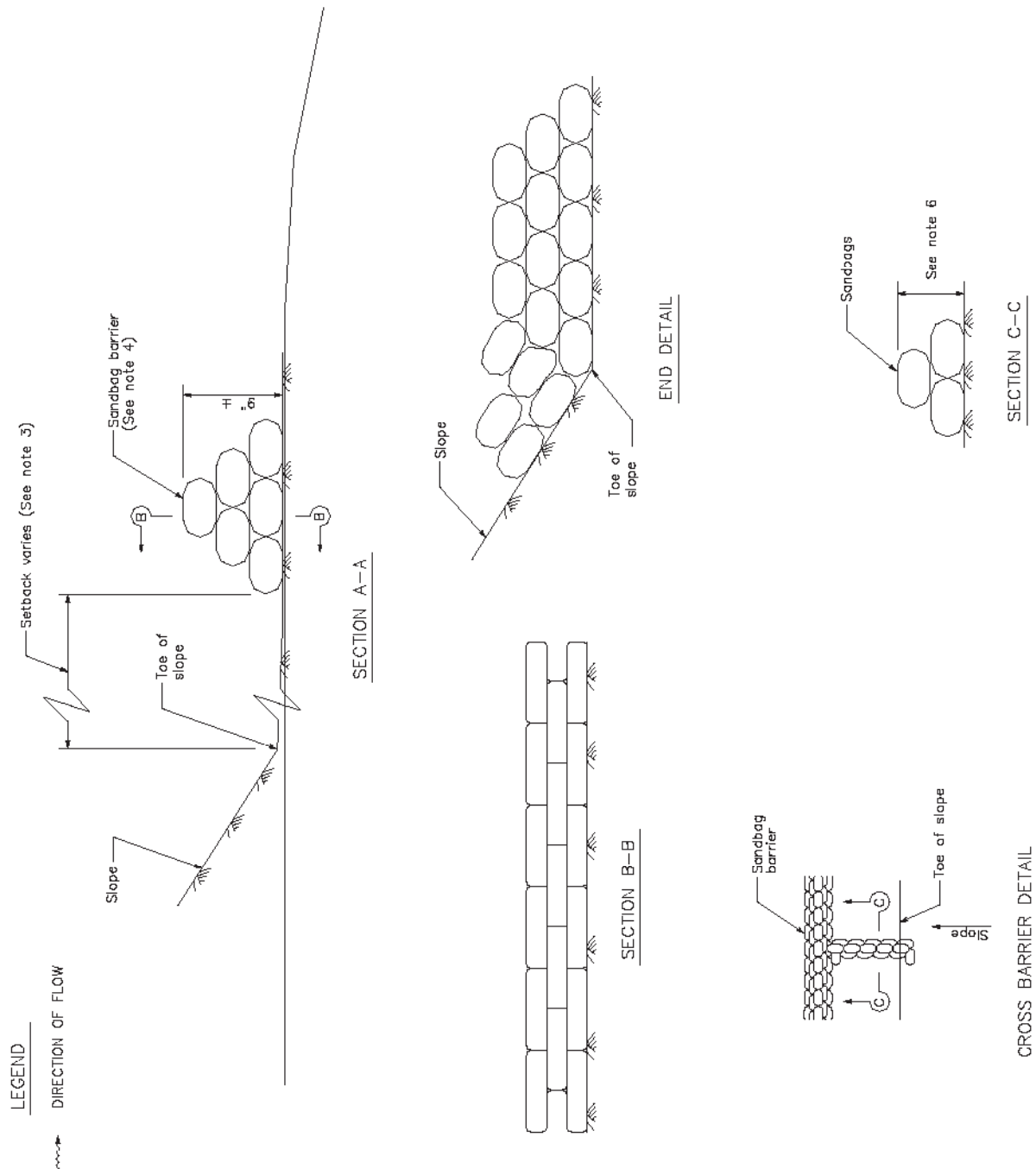
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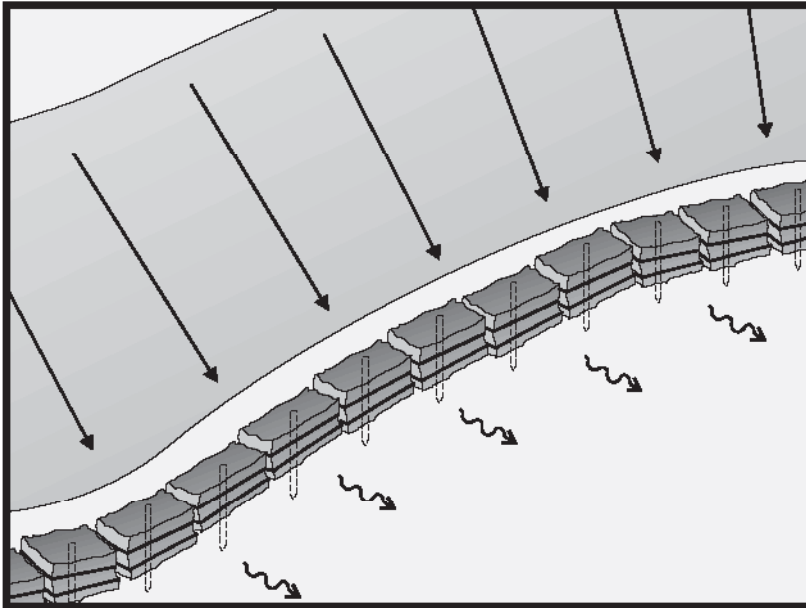


SANDBAG BARRIER

NOTES

1. Construct the length of each reach so that the change in base elevation along the reach does not exceed $1/2$ the height of the linear barrier. In no case shall the reach length exceed 500'.
2. Place sandbags tightly.
3. Dimension may vary to fit field condition.
4. Sandbag barrier shall be a minimum of 3 bags high.
5. The end of the barrier shall be turned up slope.
6. Cross barriers shall be a min of $1/2$ and a max of $2/3$ the height of the linear barrier.
7. Sandbag rows and layers shall be staggered to eliminate gaps.





Description and Purpose

A straw bale barrier is a series of straw bales placed on a level contour to intercept sheet flows. Straw bale barriers pond sheet-flow runoff, allowing sediment to settle out.

Suitable Applications

Straw bale barriers may be suitable:

- As a linear sediment control measure:
 - Below the toe of slopes and erodible slopes
 - As sediment traps at culvert/pipe outlets
 - Below other small cleared areas
 - Along the perimeter of a site
 - Down slope of exposed soil areas
 - Around temporary stockpiles and spoil areas
 - Parallel to a roadway to keep sediment off paved areas
 - Along streams and channels
- As linear erosion control measure:
 - Along the face and at grade breaks of exposed and erodible slopes to shorten slope length and spread runoff as sheet flow

Objectives

EC	Erosion Control	☒
SE	Sediment Control	☒
TR	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

- SE-1 Silt Fence
- SE-5 Fiber Rolls
- SE-6 Gravel Bag Berm
- SE-8 Sandbag Barrier



- At the top of slopes to divert runoff away from disturbed slopes
- As check dams across mildly sloped construction roads

Limitations

Straw bale barriers:

- Are not to be used for extended periods of time because they tend to rot and fall apart
- Are suitable only for sheet flow on slopes of 10 % or flatter
- Are not appropriate for large drainage areas, limit to one acre or less
- May require constant maintenance due to rotting
- Are not recommended for concentrated flow, inlet protection, channel flow, and live streams
- Cannot be made of bale bindings of jute or cotton
- Require labor-intensive installation and maintenance
- Cannot be used on paved surfaces
- Should not to be used for drain inlet protection
- Should not be used on lined ditches
- May introduce undesirable non-native plants to the area

Implementation***General***

A straw bale barrier consists of a row of straw bales placed on a level contour. When appropriately placed, a straw bale barrier intercepts and slows sheet flow runoff, causing temporary ponding. The temporary ponding provides quiescent conditions allowing sediment to settle. Straw bale barriers also interrupt the slope length and thereby reduce erosion by reducing the tendency of sheet flows to concentrate into rivulets, which erode rills, and ultimately gullies, into disturbed, sloped soils.

Straw bale barriers have not been as effective as expected due to improper use. These barriers have been placed in streams and drainage ways where runoff volumes and velocities have caused the barriers to wash out. In addition, failure to stake and entrench the straw bale has allowed undercutting and end flow. Use of straw bale barriers in accordance with this BMP should produce acceptable results.

Design and Layout

- Locate straw bale barriers on a level contour.
 - Slopes up to 10:1 (H:V): Straw bales should be placed at a maximum interval of 50 ft (a closer spacing is more effective), with the first row near the toe of slope.
 - Slopes greater than 10:1 (H:V): Not recommended.

- Turn the ends of the straw bale barrier up slope to prevent runoff from going around the barrier.
- Allow sufficient space up slope from the barrier to allow ponding, and to provide room for sediment storage.
- For installation near the toe of the slope, consider moving the barrier away from the slope toe to facilitate cleaning. To prevent flow behind the barrier, sand bags can be placed perpendicular to the barrier to serve as cross barriers.
- Drainage area should not exceed 1 acre, or 0.25 acre per 100 ft of barrier.
- Maximum flow path to the barrier should be limited to 100 ft.
- Straw bale barriers should consist of two parallel rows.
 - Butt ends of bales tightly
 - Stagger butt joints between front and back row
 - Each row of bales must be trenched in and firmly staked
- Straw bale barriers are limited in height to one bale laid on its side.
- Anchor bales with either two wood stakes or four bars driven through the bale and into the soil. Drive the first stake towards the butt joint with the adjacent bale to force the bales together.
- See attached figure for installation details.

Materials

- **Straw Bale Size:** Each straw bale should be a minimum of 14 in. wide, 18 in. in height, 36 in. in length and should have a minimum mass of 50 lbs. The straw bale should be composed entirely of vegetative matter, except for the binding material.
- **Bale Bindings:** Bales should be bound by steel wire, nylon or polypropylene string placed horizontally. Jute and cotton binding should not be used. Baling wire should be a minimum diameter of 14 gauge. Nylon or polypropylene string should be approximately 12 gauge in diameter with a breaking strength of 80 lbs force.
- **Stakes:** Wood stakes should be commercial quality lumber of the size and shape shown on the plans. Each stake should be free from decay, splits or cracks longer than the thickness of the stake, or other defects that would weaken the stakes and cause the stakes to be structurally unsuitable. Steel bar reinforcement should be equal to a #4 designation or greater. End protection should be provided for any exposed bar reinforcement.

Costs

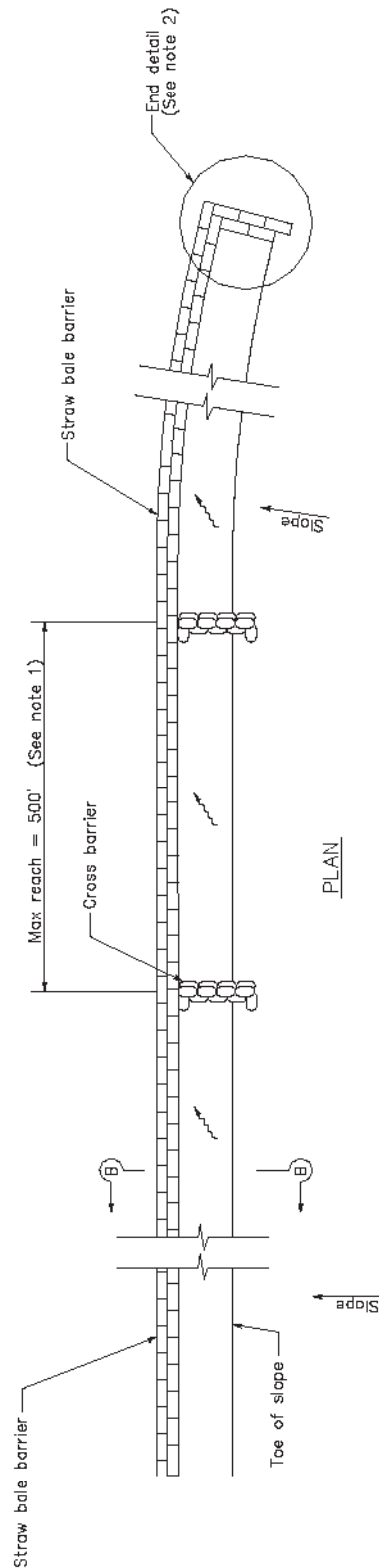
Straw bales cost \$5 - \$7 each. Adequate labor should be budgeted for installation and maintenance.

Inspection and Maintenance***Maintenance***

- Inspect BMPs prior to forecast rain, daily during extended rain events, after rain events, weekly during the rainy season, and at two-week intervals during the non-rainy season.
- Straw bales degrade, especially when exposed to moisture. Rotting bales will need to be replaced on a regular basis.
- Replace or repair damaged bales as needed.
- Repair washouts or other damages as needed.
- Sediment that accumulates in the BMP must be periodically removed in order to maintain BMP effectiveness. Sediment should be removed when the sediment accumulation reaches one-third of the barrier height. Sediment removed during maintenance may be incorporated into earthwork on the site or disposed at an appropriate location.
- Remove straw bales when no longer needed. Remove sediment accumulation, and clean, re-grade, and stabilize the area. Removed sediment should be incorporated in the project or disposed of.

References

Stormwater Quality Handbooks - Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.



STRAW BALE BARRIER

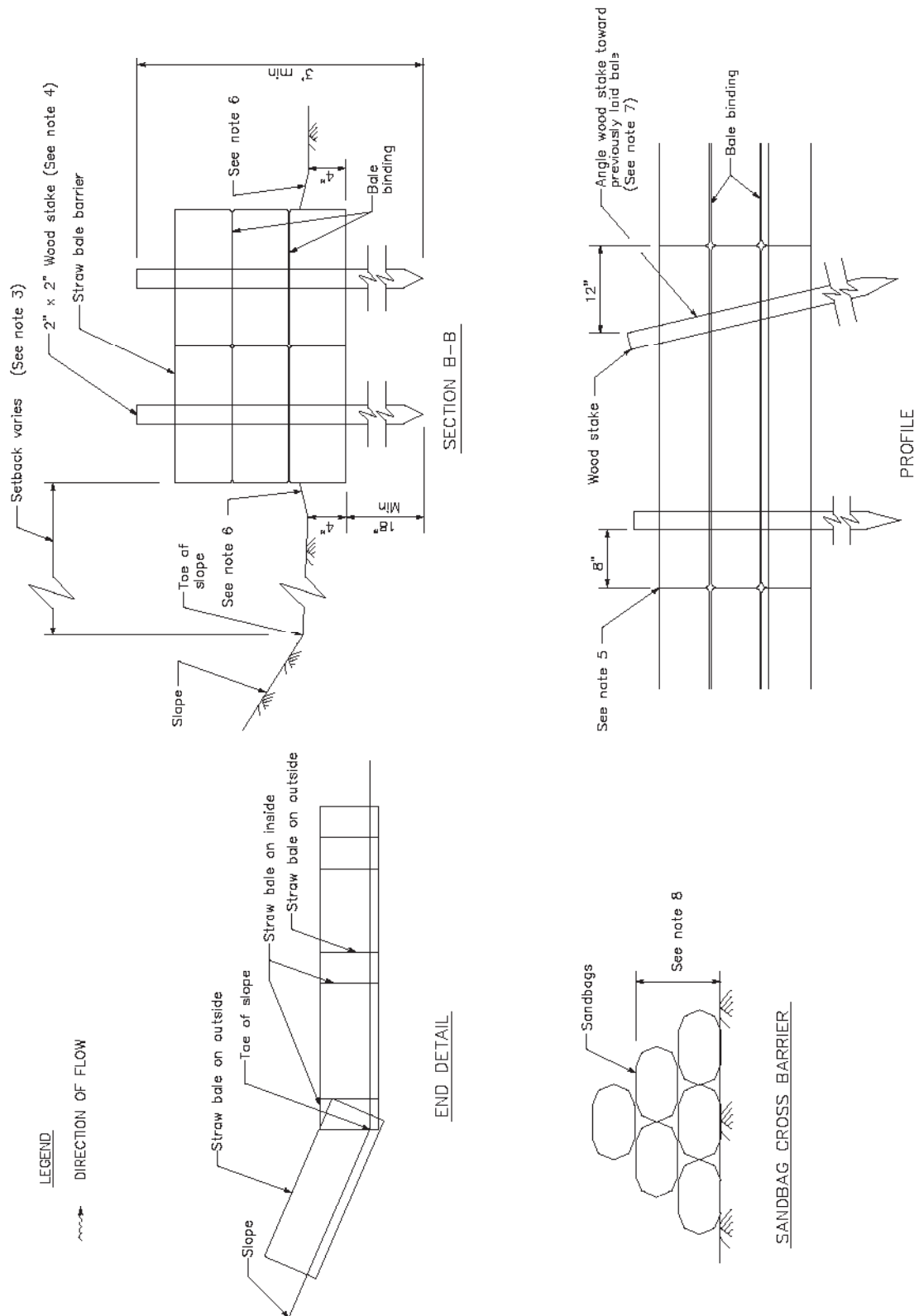
NOTES

1. Construct the length of each reach so that the change in base elevation along the reach does not exceed $1/2$ the height of the linear barrier. In no case shall the reach length exceed 500'.
2. The end of barrier shall be turned up slope.
3. Dimension may vary to fit field condition.
4. Stake dimensions are nominal.
5. Place straw bales tightly together.
6. Tamp embedment spoils against sides of installed bales.
7. Drive angled wood stake before vertical stake to ensure tight abutment to adjacent bale.
8. Sandbag cross barriers should be a min of $1/2$ and a max of $2/3$ the height of the linear barrier.
9. Sandbag rows and layers should be offset to eliminate gaps.

LEGEND

DIRECTION OF FLOW







Description and Purpose

Water conservation practices are activities that use water during the construction of a project in a manner that avoids causing erosion and the transport of pollutants offsite. These practices can reduce or eliminate non-stormwater discharges.

Suitable Applications

Water conservation practices are suitable for all construction sites where water is used, including piped water, metered water, trucked water, and water from a reservoir.

Limitations

- None identified.

Implementation

- Keep water equipment in good working condition.
- Stabilize water truck filling area.
- Repair water leaks promptly.
- Washing of vehicles and equipment on the construction site is discouraged.
- Avoid using water to clean construction areas. If water must be used for cleaning or surface preparation, surface should be swept and vacuumed first to remove dirt. This will minimize amount of water required.

Objectives

EC	Erosion Control	☒
SE	Sediment Control	☒
TR	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	☒
WM	Waste Management and Materials Pollution Control	

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	
Trash	
Metals	
Bacteria	
Oil and Grease	
Organics	

Potential Alternatives

None



- Direct construction water runoff to areas where it can soak into the ground or be collected and reused.
- Authorized non-stormwater discharges to the storm drain system, channels, or receiving waters are acceptable with the implementation of appropriate BMPs.
- Lock water tank valves to prevent unauthorized use.

Costs

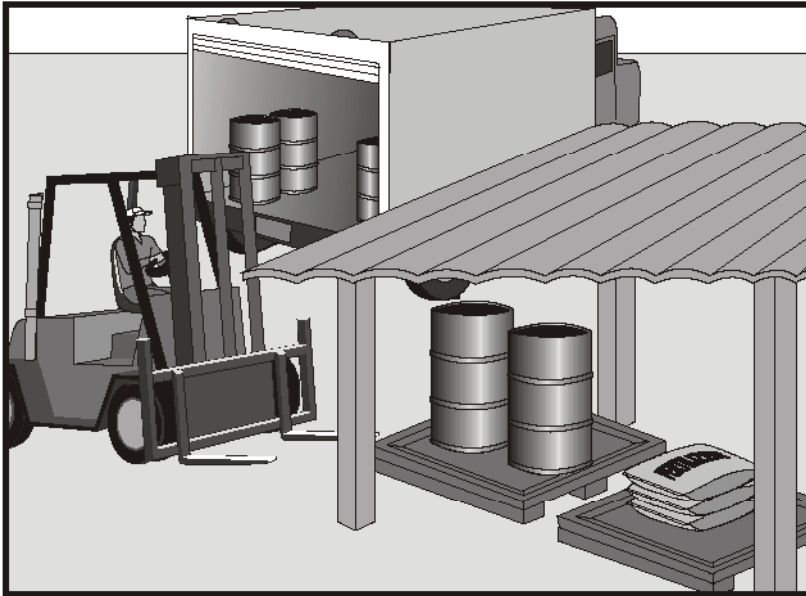
The cost is small to none compared to the benefits of conserving water.

Inspection and Maintenance

- Inspect and verify that activity based BMPs are in place prior to the commencement of authorized non-stormwater discharges.
- Inspect BMPs subject to non-stormwater discharges daily while non-stormwater discharges are occurring.
- Repair water equipment as needed to prevent unintended discharges.
 - Water trucks
 - Water reservoirs (water buffalos)
 - Irrigation systems
 - Hydrant connections

References

Stormwater Quality Handbooks - Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.



Description and Purpose

Prevent, reduce, or eliminate the discharge of pollutants from material delivery and storage to the stormwater system or watercourses by minimizing the storage of hazardous materials onsite, storing materials in a designated area, installing secondary containment, conducting regular inspections, and training employees and subcontractors.

This best management practice covers only material delivery and storage. For other information on materials, see WM-2, Material Use, or WM-4, Spill Prevention and Control. For information on wastes, see the waste management BMPs in this section.

Suitable Applications

These procedures are suitable for use at all construction sites with delivery and storage of the following materials:

- Soil stabilizers and binders
- Pesticides and herbicides
- Fertilizers
- Detergents
- Plaster
- Petroleum products such as fuel, oil, and grease
- Asphalt and concrete components

Objectives

EC	Erosion Control	
SE	Sediment Control	
TC	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	☒

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	☒
Trash	☒
Metals	☒
Bacteria	
Oil and Grease	☒
Organics	☒

Potential Alternatives

None



- Hazardous chemicals such as acids, lime, glues, adhesives, paints, solvents, and curing compounds
- Concrete compounds
- Other materials that may be detrimental if released to the environment

Limitations

- Space limitation may preclude indoor storage.
- Storage sheds often must meet building and fire code requirements.

Implementation

The following steps should be taken to minimize risk:

- Temporary storage area should be located away from vehicular traffic.
- Material Safety Data Sheets (MSDS) should be supplied for all materials stored.
- Construction site areas should be designated for material delivery and storage.
- Material delivery and storage areas should be located near the construction entrances, away from waterways, if possible.
 - Avoid transport near drainage paths or waterways.
 - Surround with earth berms. See EC-9, Earth Dikes and Drainage Swales.
 - Place in an area which will be paved.
- Storage of reactive, ignitable, or flammable liquids must comply with the fire codes of your area. Contact the local Fire Marshal to review site materials, quantities, and proposed storage area to determine specific requirements. See the Flammable and Combustible Liquid Code, NFPA30.
- An up to date inventory of materials delivered and stored onsite should be kept.
- Hazardous materials storage onsite should be minimized.
- Hazardous materials should be handled as infrequently as possible.
- During the rainy season, consider storing materials in a covered area. Store materials in secondary containments such as earthen dike, horse trough, or even a children's wading pool for non-reactive materials such as detergents, oil, grease, and paints. Small amounts of material may be secondarily contained in "bus boy" trays or concrete mixing trays.
- Do not store chemicals, drums, or bagged materials directly on the ground. Place these items on a pallet and, when possible, in secondary containment.

- If drums must be kept uncovered, store them at a slight angle to reduce ponding of rainwater on the lids to reduce corrosion. Domed plastic covers are inexpensive and snap to the top of drums, preventing water from collecting.
- Chemicals should be kept in their original labeled containers.
- Employees and subcontractors should be trained on the proper material delivery and storage practices.
- Employees trained in emergency spill cleanup procedures must be present when dangerous materials or liquid chemicals are unloaded.
- If significant residual materials remain on the ground after construction is complete, properly remove materials and any contaminated soil. See WM-7, Contaminated Soil Management. If the area is to be paved, pave as soon as materials are removed to stabilize the soil.

Material Storage Areas and Practices

- Liquids, petroleum products, and substances listed in 40 CFR Parts 110, 117, or 302 should be stored in approved containers and drums and should not be overfilled. Containers and drums should be placed in temporary containment facilities for storage.
- A temporary containment facility should provide for a spill containment volume able to contain precipitation from a 25 year storm event, plus the greater of 10% of the aggregate volume of all containers or 100% of the capacity of the largest container within its boundary, whichever is greater.
- A temporary containment facility should be impervious to the materials stored therein for a minimum contact time of 72 hours.
- A temporary containment facility should be maintained free of accumulated rainwater and spills. In the event of spills or leaks, accumulated rainwater and spills should be collected and placed into drums. These liquids should be handled as a hazardous waste unless testing determines them to be non-hazardous. All collected liquids or non-hazardous liquids should be sent to an approved disposal site.
- Sufficient separation should be provided between stored containers to allow for spill cleanup and emergency response access.
- Incompatible materials, such as chlorine and ammonia, should not be stored in the same temporary containment facility.
- Throughout the rainy season, each temporary containment facility should be covered during non-working days, prior to, and during rain events.
- Materials should be stored in their original containers and the original product labels should be maintained in place in a legible condition. Damaged or otherwise illegible labels should be replaced immediately.

WM-1 Material Delivery and Storage

- Bagged and boxed materials should be stored on pallets and should not be allowed to accumulate on the ground. To provide protection from wind and rain throughout the rainy season, bagged and boxed materials should be covered during non-working days and prior to and during rain events.
- Stockpiles should be protected in accordance with WM-3, Stockpile Management.
- Materials should be stored indoors within existing structures or sheds when available.
- Proper storage instructions should be posted at all times in an open and conspicuous location.
- An ample supply of appropriate spill clean up material should be kept near storage areas.
- Also see WM-6, Hazardous Waste Management, for storing of hazardous materials.

Material Delivery Practices

- Keep an accurate, up-to-date inventory of material delivered and stored onsite.
- Arrange for employees trained in emergency spill cleanup procedures to be present when dangerous materials or liquid chemicals are unloaded.

Spill Cleanup

- Contain and clean up any spill immediately.
- Properly remove and dispose of any hazardous materials or contaminated soil if significant residual materials remain on the ground after construction is complete. See WM-7, Contaminated Soil Management.
- See WM-4, Spill Prevention and Control, for spills of chemicals and/or hazardous materials.

Cost

- The largest cost of implementation may be in the construction of a materials storage area that is covered and provides secondary containment.

Inspection and Maintenance

- Inspect and verify that activity-based BMPs are in place prior to the commencement of associated activities. While activities associated with the BMP are under way, inspect weekly during the rainy season and of two-week intervals in the non-rainy season to verify continued BMP implementation.
- Keep an ample supply of spill cleanup materials near the storage area.
- Keep storage areas clean, well organized, and equipped with ample cleanup supplies as appropriate for the materials being stored.
- Repair or replace perimeter controls, containment structures, covers, and liners as needed to maintain proper function.

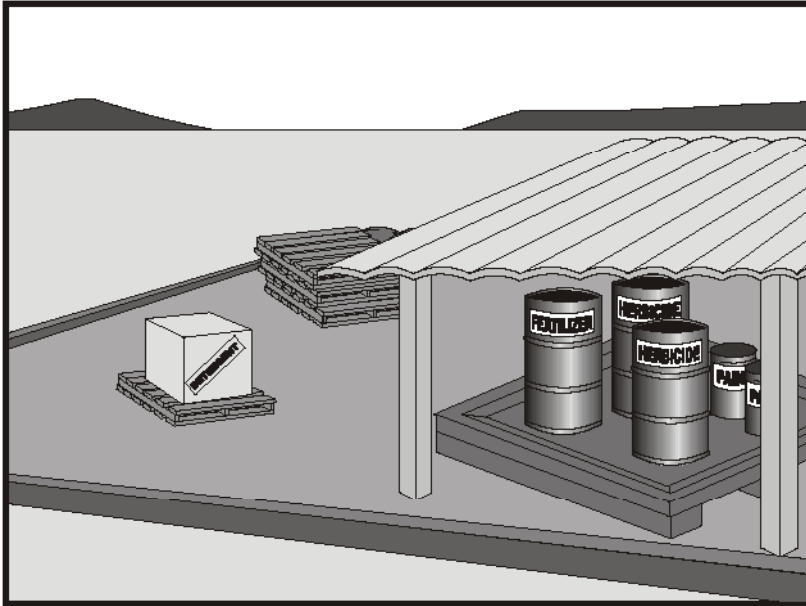
References

Blueprint for a Clean Bay: Best Management Practices to Prevent Stormwater Pollution from Construction Related Activities; Santa Clara Valley Nonpoint Source Pollution Control Program, 1995.

Coastal Nonpoint Pollution Control Program: Program Development and Approval Guidance, Working Group Working Paper; USEPA, April 1992.

Stormwater Quality Handbooks - Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.

Stormwater Management for Construction Activities; Developing Pollution Prevention Plans and Best Management Practice, EPA 832-R-92005; USEPA, April 1992.



Description and Purpose

Prevent or reduce the discharge of pollutants to the storm drain system or watercourses from material use by using alternative products, minimizing hazardous material use onsite, and training employees and subcontractors.

Suitable Applications

This BMP is suitable for use at all construction projects. These procedures apply when the following materials are used or prepared onsite:

- Pesticides and herbicides
- Fertilizers
- Detergents
- Plaster
- Petroleum products such as fuel, oil, and grease
- Asphalt and other concrete components
- Other hazardous chemicals such as acids, lime, glues, adhesives, paints, solvents, and curing compounds
- Concrete compounds
- Other materials that may be detrimental if released to the environment

Objectives

EC	Erosion Control	
SE	Sediment Control	
TC	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	☒

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	☒
Trash	☒
Metals	☒
Bacteria	
Oil and Grease	☒
Organics	☒

Potential Alternatives

None



Limitations

Safer alternative building and construction products may not be available or suitable in every instance.

Implementation

The following steps should be taken to minimize risk:

- Minimize use of hazardous materials onsite.
- Follow manufacturer instructions regarding uses, protective equipment, ventilation, flammability, and mixing of chemicals.
- Train personnel who use pesticides. The California Department of Pesticide Regulation and county agricultural commissioners license pesticide dealers, certify pesticide applicators, and conduct onsite inspections.
- Do not over-apply fertilizers, herbicides, and pesticides. Prepare only the amount needed. Follow the recommended usage instructions. Over-application is expensive and environmentally harmful. Unless on steep slopes, till fertilizers into the soil rather than hydro seeding. Apply surface dressings in several smaller applications, as opposed to one large application, to allow time for infiltration and to avoid excess material being carried offsite by runoff. Do not apply these chemicals just before it rains.
- Train employees and subcontractors in proper material use.
- Supply Material Safety Data Sheets (MSDS) for all materials.
- Dispose of latex paint and paint cans, used brushes, rags, absorbent materials, and drop cloths, when thoroughly dry and are no longer hazardous, with other construction debris.
- Do not remove the original product label; it contains important safety and disposal information. Use the entire product before disposing of the container.
- Mix paint indoors or in a containment area. Never clean paintbrushes or rinse paint containers into a street, gutter, storm drain, or watercourse. Dispose of any paint thinners, residue, and sludge(s) that cannot be recycled, as hazardous waste.
- For water-based paint, clean brushes to the extent practicable, and rinse to a drain leading to a sanitary sewer where permitted, or into a concrete washout pit or temporary sediment trap. For oil-based paints, clean brushes to the extent practicable, and filter and reuse thinners and solvents.
- Use recycled and less hazardous products when practical. Recycle residual paints, solvents, non-treated lumber, and other materials.
- Use materials only where and when needed to complete the construction activity. Use safer alternative materials as much as possible. Reduce or eliminate use of hazardous materials onsite when practical.

- Require contractors to complete the “Report of Chemical Spray Forms” when spraying herbicides and pesticides.
- Keep an ample supply of spill clean up material near use areas. Train employees in spill clean up procedures.
- Avoid exposing applied materials to rainfall and runoff unless sufficient time has been allowed for them to dry.

Costs

All of the above are low cost measures.

Inspection and Maintenance

- Inspect and verify that activity-based BMPs are in place prior to the commencement of associated activities. While activities associated with the BMP are under way, inspect weekly during the rainy season and at two-week intervals in the non-rainy season to verify continued BMP implementation.
- Maintenance of this best management practice is minimal.
- Spot check employees and subcontractors throughout the job to ensure appropriate practices are being employed.

References

Blueprint for a Clean Bay: Best Management Practices to Prevent Stormwater Pollution from Construction Related Activities; Santa Clara Valley Nonpoint Source Pollution Control Program, 1995.

Coastal Nonpoint Pollution Control Program: Program Development and Approval Guidance, Working Group Working Paper; USEPA, April 1992.

Stormwater Quality Handbooks - Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.

Stormwater Management for Construction Activities; Developing Pollution Prevention Plans and Best Management Practice, EPA 832-R-92005; USEPA, April 1992.



Description and Purpose

Stockpile Management procedures and practices are designed to reduce or eliminate air and stormwater pollution from stockpiles of soil, paving materials such as portland cement concrete (PCC) rubble, asphalt concrete (AC), asphalt concrete rubble, aggregate base, aggregate sub base or pre-mixed aggregate, asphalt minder (so called "cold mix" asphalt), and pressure treated wood.

Suitable Applications

Implement in all projects that stockpile soil and other materials.

Limitations

None identified.

Implementation

Protection of stockpiles is a year-round requirement. To properly manage stockpiles:

- Locate stockpiles a minimum of 50 ft away from concentrated flows of stormwater, drainage courses, and inlets.
- Protect all stockpiles from stormwater runoff using a temporary perimeter sediment barrier such as berms, dikes, fiber rolls, silt fences, sandbag, gravel bags, or straw bale barriers.

Objectives

EC	Erosion Control	
SE	Sediment Control	
TC	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	☒

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	☒
Trash	☒
Metals	☒
Bacteria	
Oil and Grease	☒
Organics	☒

Potential Alternatives

None



- Implement wind erosion control practices as appropriate on all stockpiled material. For specific information, see WE-1, Wind Erosion Control.
- Manage stockpiles of contaminated soil in accordance with WM-7, Contaminated Soil Management.
- Place bagged materials on pallets and under cover.

Protection of Non-Active Stockpiles

Non-active stockpiles of the identified materials should be protected further as follows:

Soil stockpiles

- During the rainy season, soil stockpiles should be covered or protected with soil stabilization measures and a temporary perimeter sediment barrier at all times.
- During the non-rainy season, soil stockpiles should be covered or protected with a temporary perimeter sediment barrier prior to the onset of precipitation.

Stockpiles of Portland cement concrete rubble, asphalt concrete, asphalt concrete rubble, aggregate base, or aggregate sub base

- During the rainy season, the stockpiles should be covered or protected with a temporary perimeter sediment barrier at all times.
- During the non-rainy season, the stockpiles should be covered or protected with a temporary perimeter sediment barrier prior to the onset of precipitation.

Stockpiles of "cold mix"

- During the rainy season, cold mix stockpiles should be placed on and covered with plastic or comparable material at all times.
- During the non-rainy season, cold mix stockpiles should be placed on and covered with plastic or comparable material prior to the onset of precipitation.

Stockpiles/Storage of pressure treated wood with copper, chromium, and arsenic or ammonical, copper, zinc, and arsenate

- During the rainy season, treated wood should be covered with plastic or comparable material at all times.
- During the non-rainy season, treated wood should be covered with plastic or comparable material at all times and cold mix stockpiles should be placed on and covered with plastic or comparable material prior to the onset of precipitation.

Protection of Active Stockpiles

Active stockpiles of the identified materials should be protected further as follows:

- All stockpiles should be protected with a temporary linear sediment barrier prior to the onset of precipitation.
- Stockpiles of "cold mix" should be placed on and covered with plastic or comparable material prior to the onset of precipitation.

Costs

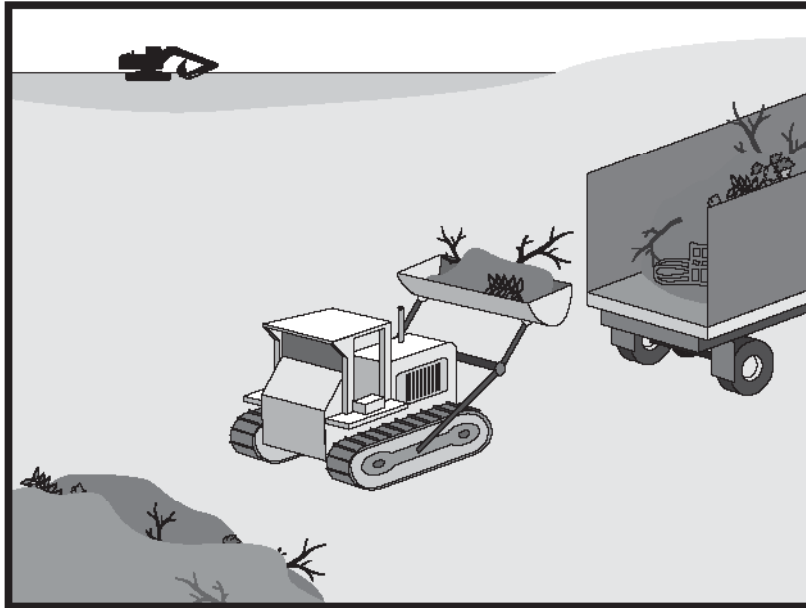
All of the above are low cost measures.

Inspection and Maintenance

- Inspect and verify that activity-based BMPs are in place prior to the commencement of associated activities. While activities associated with the BMP are under way, inspect weekly during the rainy season and of two-week intervals in the non-rainy season to verify continued BMP implementation
- Repair and/or replace perimeter controls and covers as needed to keep them functioning properly.

References

Stormwater Quality Handbooks - Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.



Description and Purpose

Solid waste management procedures and practices are designed to prevent or reduce the discharge of pollutants to stormwater from solid or construction waste by providing designated waste collection areas and containers, arranging for regular disposal, and training employees and subcontractors.

Suitable Applications

This BMP is suitable for construction sites where the following wastes are generated or stored:

- Solid waste generated from trees and shrubs removed during land clearing, demolition of existing structures (rubble), and building construction
- Packaging materials including wood, paper, and plastic
- Scrap or surplus building materials including scrap metals, rubber, plastic, glass pieces and masonry products
- Domestic wastes including food containers such as beverage cans, coffee cups, paper bags, plastic wrappers, and cigarettes
- Construction wastes including brick, mortar, timber, steel and metal scraps, pipe and electrical cuttings, non-hazardous equipment parts, styrofoam and other materials used to transport and package construction materials

Objectives

EC	Erosion Control	
SE	Sediment Control	
TC	Tracking Control	
WE	Wind Erosion Control	
NS	Non-Stormwater Management Control	
WM	Waste Management and Materials Pollution Control	☒

Legend:

- ☒ Primary Objective
- ☒ Secondary Objective

Targeted Constituents

Sediment	☒
Nutrients	☒
Trash	☒
Metals	☒
Bacteria	
Oil and Grease	☒
Organics	☒

Potential Alternatives

None



- Highway planting wastes, including vegetative material, plant containers, and packaging materials

Limitations

Temporary stockpiling of certain construction wastes may not necessitate stringent drainage related controls during the non-rainy season or in desert areas with low rainfall.

Implementation

The following steps will help keep a clean site and reduce stormwater pollution:

- Select designated waste collection areas onsite.
- Inform trash-hauling contractors that you will accept only watertight dumpsters for onsite use. Inspect dumpsters for leaks and repair any dumpster that is not watertight.
- Locate containers in a covered area or in a secondary containment.
- Provide an adequate number of containers with lids or covers that can be placed over the container to keep rain out or to prevent loss of wastes when it is windy.
- Plan for additional containers and more frequent pickup during the demolition phase of construction.
- Collect site trash daily, especially during rainy and windy conditions.
- Remove this solid waste promptly since erosion and sediment control devices tend to collect litter.
- Make sure that toxic liquid wastes (used oils, solvents, and paints) and chemicals (acids, pesticides, additives, curing compounds) are not disposed of in dumpsters designated for construction debris.
- Do not hose out dumpsters on the construction site. Leave dumpster cleaning to the trash hauling contractor.
- Arrange for regular waste collection before containers overflow.
- Clean up immediately if a container does spill.
- Make sure that construction waste is collected, removed, and disposed of only at authorized disposal areas.

Education

- Have the contractor's superintendent or representative oversee and enforce proper solid waste management procedures and practices.
- Instruct employees and subcontractors on identification of solid waste and hazardous waste.
- Educate employees and subcontractors on solid waste storage and disposal procedures.

- Hold regular meetings to discuss and reinforce disposal procedures (incorporate into regular safety meetings).
- Require that employees and subcontractors follow solid waste handling and storage procedures.
- Prohibit littering by employees, subcontractors, and visitors.
- Minimize production of solid waste materials wherever possible.

Collection, Storage, and Disposal

- Littering on the project site should be prohibited.
- To prevent clogging of the storm drainage system, litter and debris removal from drainage grates, trash racks, and ditch lines should be a priority.
- Trash receptacles should be provided in the contractor's yard, field trailer areas, and at locations where workers congregate for lunch and break periods.
- Litter from work areas within the construction limits of the project site should be collected and placed in watertight dumpsters at least weekly, regardless of whether the litter was generated by the contractor, the public, or others. Collected litter and debris should not be placed in or next to drain inlets, stormwater drainage systems, or watercourses.
- Dumpsters of sufficient size and number should be provided to contain the solid waste generated by the project.
- Full dumpsters should be removed from the project site and the contents should be disposed of by the trash hauling contractor.
- Construction debris and waste should be removed from the site biweekly or more frequently as needed.
- Construction material visible to the public should be stored or stacked in an orderly manner.
- Stormwater runoff should be prevented from contacting stored solid waste through the use of berms, dikes, or other temporary diversion structures or through the use of measures to elevate waste from site surfaces.
- Solid waste storage areas should be located at least 50 ft from drainage facilities and watercourses and should not be located in areas prone to flooding or ponding.
- Except during fair weather, construction and highway planting waste not stored in watertight dumpsters should be securely covered from wind and rain by covering the waste with tarps or plastic.
- Segregate potentially hazardous waste from non-hazardous construction site waste.
- Make sure that toxic liquid wastes (used oils, solvents, and paints) and chemicals (acids, pesticides, additives, curing compounds) are not disposed of in dumpsters designated for construction debris.

- For disposal of hazardous waste, see WM-6, Hazardous Waste Management. Have hazardous waste hauled to an appropriate disposal and/or recycling facility.
- Salvage or recycle useful vegetation debris, packaging and surplus building materials when practical. For example, trees and shrubs from land clearing can be used as a brush barrier, or converted into wood chips, then used as mulch on graded areas. Wood pallets, cardboard boxes, and construction scraps can also be recycled.

Costs

All of the above are low cost measures.

Inspection and Maintenance

- Inspect and verify that activity-based BMPs are in place prior to the commencement of associated activities. While activities associated with the BMP are under way, inspect weekly during the rainy season and of two-week intervals in the non-rainy season to verify continued BMP implementation.
- Inspect BMPs subject to non-stormwater discharge daily while non-stormwater discharges occur
- Inspect construction waste area regularly.
- Arrange for regular waste collection.

References

Processes, Procedures and Methods to Control Pollution Resulting from All Construction Activity, 430/9-73-007, USEPA, 1973.

Stormwater Quality Handbooks - Construction Site Best Management Practices (BMPs) Manual, State of California Department of Transportation (Caltrans), November 2000.

Stormwater Management for Construction Activities; Developing Pollution Prevention Plans and Best Management Practice, EPA 832-R-92005; USEPA, April 1992.

BG-40 Landscape Maintenance



Photo Credit: Geoff Brownlee

Description

This category includes businesses that provide landscaping and landscape maintenance/gardening services.

Pollutant Sources

The following are sources of pollutants:

- Selecting plants or landscape design,
- Installing new landscaping,
- Maintaining landscapes,
- Using pesticides and fertilizers, and
- Using gas-powered equipment.

Pollutants can include:

- Nutrients (fertilizers, yard wastes),
- Pesticides,
- Heavy metals (copper, lead, and zinc),
- Hydrocarbons (fuels, oils and grease), and
- Sediments.

Approach

Minimize the potential for stormwater pollution and the need for resources/controls (water, pesticides, fertilizers) by creating and maintaining landscapes in a way that is compatible with the local soils, climate, and amount of rain and sun. Make stormwater pollution prevention BMPs a part of standard operating procedures and the employee training program.



BG-40 Landscape Maintenance

Provide employee education materials in the first language of employees, as necessary.

Source Control BMPs

The best management practices are listed by activity or area.

Landscape Design	□ Specify native, low maintenance, and insectary (attract beneficial insects) plants and landscape designs. □ Design zoned, water-efficient irrigation systems using technologies such as drip irrigation, soaker hoses, or microspray systems. Landscape design should be consistent with the local Water Efficient Landscape Ordinance. See the following website for a list of local ordinances: http://ftp.water.ca.gov/Model-Water-Efficient-Landscape-Ordinance/Local-Ordinances/ □ Do not landscape riparian areas, except to remove non-native plants and replace them with native riparian landscaping. □ Replant with native species where possible when landscaping or building an ornamental pond. Do not assume something is native because you have seen it in your area. Contact the local nursery for information or visit the California Exotic Pest Plant Council website (www.caleppe.org).
Landscape Installation	□ Protect stockpiles and landscaping materials from wind and rain by storing them under tarps or secured plastic sheeting. □ Schedule grading and excavation projects during dry weather. □ Divert runoff from exposed soils or lower its velocity by leveling and terracing. □ Use temporary check dams or ditches to divert runoff away from storm drains. □ Protect storm drains with sandbags or other sediment controls. □ Revegetation is an excellent form of erosion control for any site. Keep soils covered with vegetation or temporary cover material (mulch) to control erosion. □ Check plant roots before buying a plant. Do not buy plants with roots that are kinked or circling around the container. Do not buy plants with soft, rotten, or deformed root crowns. □ Do not pile soil around the plant any higher than the root crown.
Landscape Maintenance	Yard Waste □ Allow leaf drop to become part of the mulch layer in trees, shrubs, and groundcover areas. □ Keep lawn mower blades sharp, and grasscycle.

BG-40 Landscape Maintenance

□ Grasscycle – leave grass clippings on the lawn when mowing. Once cut, grass clippings first dehydrate, and then decompose, quickly disappearing from view. Proper mowing is required for successful grasscycling. Cut grass when the surface is dry, and keep mower blades sharp. Follow the "1/3 Rule": mow the lawn often enough so that no more than 1/3 of the length of the grass blade is cut in any one mowing. Frequent mowing will produce short clippings that will not cover up the grass surface. The lawn may have to be cut every seven days when the lawn is growing fast but only every 7 to 14 days when the lawn is growing slowly. □ Do not leave clippings on pavement or sidewalks where they can wash off into the street, gutter, or storm drain. □ Collect lawn and garden clippings, pruning waste, and tree trimmings. Chip if necessary, and compost or take to the local municipal yard waste recycling/composting facility. □ In communities with curbside pick-up of yard waste, place clippings and pruning waste at the curb in approved bags or containers. No curbside pickup of yard waste is available for commercial properties. □ Do not blow or rake leaves or other yard waste into the street, or place yard waste in gutters or on dirt shoulders, unless it is being piled up for recycling (allowed by some municipalities). After pick-up, sweep up any leaves, litter, or residue in gutters or on street. Fertilizing and Pruning □ Perform soil analysis seasonally to determine actual fertilization need and application rates. □ Fertilize garden areas with a mulch of leaves, bark, or composted manure and/or garden waste. □ Apply chemical fertilizer only as needed, when plants can best use it, and when the potential for it being carried away by runoff is low. Make sure the fertilizer spreader is calibrated. □ Prune plants sparingly, if at all. A healthy plant – one that is native to the area and growing under the right conditions – should not need pruning, except when it is not in the right location (where safety or liability is a concern). Watering □ Use soil probes to determine soil moisture depth, overall moisture levels, and the need to adjust irrigation schedules. □ Check sprinklers regularly. Adjust as needed to minimize or eliminate overspray onto impervious surfaces. Replace broken sprinklers or lines.

BG-40 Landscape Maintenance

Pest and Weed Control □ Obtain appropriate licenses for pest control and pesticides. Contact the Department of Pesticide Regulation for more information. □ Become trained in and offer customers less-toxic pest control or Integrated Pest Management (IPM). □ The label on a pesticide container is a legal document. Use a pesticide only as instructed on the label. □ Store pesticides, fertilizers, and other chemicals indoors or in a shed or storage cabinet. □ Use pesticides sparingly, according to instructions on the label. Rinse empty containers, and use rinsewater as product. □ Dispose of rinsed, empty containers in the trash. Dispose of unused pesticides as hazardous waste. □ To control weeds, use drip irrigation and mulch. Hand-pull weeds including roots or cut down to ground. Repeat cutting before they flower, grow new leaves, or go to seed. Use herbicides containing pelargonic acid or herbicidal soap as a last resort. Handling Gasoline □ Use only containers approved by a nationally recognized testing lab, such as Underwriters Laboratories (UL). Keep the container tightly sealed. Containers should be fitted with a spout to allow pouring without spilling and to minimize the generation of vapors. □ Fill cautiously. Always use a funnel and/or spout to prevent spilling or splashing when fueling power mowers, blowers, and all other gas-powered equipment. □ Avoid spilling gasoline on the ground, especially near wells. If a spill occurs use kitty litter, saw dust, or an absorbent towel to soak up the spill, then dispose of it properly. □ Store carefully. Gasoline moves quickly through soil and into groundwater, therefore, store and use gasoline and fuel equipment as far away from your drinking water well as possible. Be certain to keep a closed cap on the gasoline container. Store at ground level, not on a shelf to minimize the danger of falling and spilling. □ Do not dispose of gasoline down the drain, into surface water, onto the ground, or in the trash. Contact the local municipality for directions on proper disposal of excess or old gasoline. Transport old gas in an approved gasoline container. Working Near Waterbodies □ Do not dump lawn clippings, other yard waste, or soil along creek banks or in creeks.
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☐	Do not store stockpiles of materials (soil, mulch) along creek banks. These piles can erode over time into a creek.
☐	Do not spray pesticides or fertilizers by creeks.
☐	Do not over water near streams. The excess water may carry pesticides, fertilizers, sediments, and anything else in its path directly into the creek.

Treatment Control BMPs

Not applicable.

More Information

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Non-Stormwater Discharges SC-10

Description

Non-stormwater discharges (NSWDs) are flows that do not consist entirely of stormwater. Some non-stormwater discharges do not include pollutants and may be discharged to the storm drain if local regulations allow. These include uncontaminated groundwater and natural springs. There are also some non-stormwater discharges that typically do not contain pollutants and may be discharged to the storm drain with conditions. These include: potable water sources, fire hydrant flushing, air conditioner condensate, landscape irrigation drainage and landscape watering, emergency firefighting, etc. as discussed in Section 2.

However there are certain non-stormwater discharges that pose an environmental concern. These discharges may originate from illegal dumping of industrial material or wastes and illegal connections such as internal floor drains, appliances, industrial processes, sinks, and toilets that are illegally connected to the nearby storm drainage system through on-site drainage and piping. These unauthorized discharges (examples of which may include: process waste waters, cooling waters, wash waters, and sanitary wastewater) can carry substances such as paint, oil, fuel and other automotive fluids, chemicals and other pollutants into storm drains.

Non-stormwater discharges will need to be addressed through a combination of detection and elimination. The ultimate goal is to effectively eliminate unauthorized non-stormwater discharges to the stormwater drainage system through implementation of measures to detect, correct, and enforce against illicit connections and illegal discharges of

Objectives

- **Cover**
- **Contain**
- **Educate**
- **Reduce/Minimize**
- **Product Substitution**

Targeted Constituents

Sediment	
Nutrients	✓
Trash	
Metals	✓
Bacteria	✓
Oil and Grease	✓
Organics	✓

Minimum BMPs Covered

	Good Housekeeping	✓
	Preventative Maintenance	
	Spill and Leak Prevention and Response	✓
	Material Handling & Waste Management	
	Erosion and Sediment Controls	
	Employee Training Program	✓
	Quality Assurance Record Keeping	✓



Non-Stormwater Discharges SC-10

pollutants on streets and into the storm drain system and downstream water bodies.

Approach

Initially the Discharger must make an assessment of non-stormwater discharges to determine which types must be eliminated or addressed through BMPs. The focus of the following approach is the elimination of unauthorized non-stormwater discharges. See other BMP Fact Sheets for activity-specific pollution prevention procedures.

General Pollution Prevention Protocols

- ☐ Implement waste management controls described in SC-34 Waste Handling and Disposal.
- ☐ Develop clear protocols and lines of communication for effectively prohibiting non-stormwater discharges, especially those that are not classified as hazardous. These are often not responded to as effectively as they need to be.
- ☐ Stencil or demarcate storm drains, where applicable, to prevent illegal disposal of pollutants. Storm drain inlets should have messages such as "Dump No Waste Drains to Stream" or similar stenciled or demarcated next to them to warn against ignorant or unintentional dumping of pollutants into the storm drainage system.
- ☐ Manage and control sources of water such as hose bibs, faucets, wash racks, irrigation heads, etc. Identify hoses and faucets in the SWPPP, and post signage for appropriate use.

Non-Stormwater Discharge Investigation Protocols

Identifying the sources of non-stormwater discharges requires the Discharger to conduct an investigation of the facility at regular intervals. There are several categories of non-stormwater discharges:

- ☐ Visible, easily identifiable discharges, typically generated as surface runoff, such as uncontained surface runoff from vehicle or equipment washing; and
- ☐ Non-visible, (e.g., subsurface) discharges into the site drainage system through a variety of pathways that are not obvious.

The approach to detecting and eliminating non-stormwater discharges will vary considerably, as discussed below:

Visible and identifiable discharges

- ☐ Conduct routine inspections of the facilities and of each major activity area and identify visible evidence of unauthorized non-stormwater discharges. This may include:
 - Visual observations of actual discharges occurring;

Non-Stormwater Discharges SC-10

- ✓ Evidence of surface staining, discoloring etc. that indicates that discharges have occurred;
 - ✓ Pools of water in low lying areas when a rain event has not occurred; and
 - ✓ Discussions with operations personnel to understand practices that may lead to unauthorized discharges.
- If evidence of non-stormwater discharges is discovered:
- ✓ Document the location and circumstances using Worksheets 5 and 6 (Section 2 of the manual), including digital photos;
 - ✓ Identify and implement any quick remedy or corrective action (e.g., moving uncovered containers inside or to a proper location); and
 - ✓ Develop a plan to eliminate the discharge. Consult the appropriate activity-specific BMP Fact Sheet for alternative approaches to manage and eliminate the discharge.
- Consult the appropriate activity-specific BMP Fact Sheet for alternative approaches to manage and eliminate the discharge. Make sure the facility SWPPP is up-to-date and includes applicable BMPs to address the non-stormwater discharge.

Other Illegal Discharges (Non visible)

Illicit Connections

- Locate discharges from the industrial storm drainage system to the municipal storm drain system through review of "as-built" piping schematics.
- Isolate problem areas and plug illicit discharge points.
- Locate and evaluate discharges to the storm drain system.
- Visual Inspection and Inventory:
 - ✓ Inventory and inspect each discharge point during dry weather.
 - ✓ Keep in mind that drainage from a storm event can continue for a day or two following the end of a storm and groundwater may infiltrate the underground stormwater collection system.
 - ✓ Non-stormwater discharges are often intermittent and may require periodic inspections.

Review Infield Piping

- A review of the "as-built" piping schematic is a way to determine if there are any connections to the stormwater collection system.

Non-Stormwater Discharges SC-10

- Inspect the path of loading/unloading area drain inlets and floor drains in older buildings.
 - Never assume storm drains are connected to the sanitary sewer system.
- Monitoring for investigation/detection of illegal discharges**
- If a suspected illegal or unknown discharge is detected, monitoring of the discharge may help identify the content and/or suggest the source. This may be done with a field screening analysis, flow meter measurements, or by collecting a sample for laboratory analysis. Section 5 and Appendix D describe the necessary field equipment and procedures for field investigations.
 - Investigative monitoring may be conducted over time. For example if, a discharge is intermittent, then monitoring might be conducted to determine the timing of the discharge to determine the source.
 - Investigative monitoring may be conducted over a spatial area. For example, if a discharge is observed in a pipe, then monitoring might be conducted at accessible upstream locations in order to pinpoint the source of the discharge.
 - Generally, investigative monitoring requiring collection of samples and submittal for lab analysis requires proper planning and specially trained staff.

Smoke Testing

Smoke testing of wastewater and stormwater collection systems is used to detect connections between the two piping systems. Smoke testing is generally performed at a downstream location and the smoke is forced upstream using blowers to create positive pressure. The advantage to smoke testing is that it can potentially identify multiple potential discharge sources at once.

- Smoke testing uses a harmless, non-toxic smoke cartridges developed specifically for this purpose.
- Smoke testing requires specialized equipment (e.g., cartridges, blowers) and is generally only appropriate for specially trained staff.
- A Standard Operating Procedure (SOP) for smoke testing is highly desirable. The SOP should address the following elements:
 - ✓ Proper planning and notification of nearby residents and emergency services is necessary since introducing smoke into the system may result in false alarms;
 - ✓ During dry weather, the stormwater collection system is filled with smoke and then traced back to sources;

Non-Stormwater Discharges SC-10

- ✓ Temporary isolation of segments of pipe using sand bags is often needed to force the smoke into leaking pipes; and
 - ✓ The appearance of smoke in a waste vent pipe, at a sewer manhole, or even the base of a toilet indicates that there may be a connection between the sanitary and storm water systems.
- Most municipal wastewater agencies will have necessary staff and equipment to conduct smoke testing and they should be contacted if cross connections with the sanitary sewer are suspected. See SC-44 Drainage System Maintenance for more information.

Dye Testing

- Dye testing is typically performed when there is a suspected specific pollutant source and location (i.e., leaking sanitary sewer) and there is evidence of dry weather flows in the stormwater collection system.
- Dye is released at a probable upstream source location, either the facility's sanitary or process wastewater system. The dye must be released with a sufficient volume of water to flush the system.
- Operators then visually examine the downstream discharge points from the stormwater collection system for the presence of the dye.
- Dye testing can be performed informally using commercially available products in order to conduct an initial investigation for fairly obvious cross-connections.
- More detailed dye testing should be performed by properly trained staff and follow SOPs. Specialized equipment such as fluorometers may be necessary to detect low concentrations of dye.
- Most municipal wastewater agencies will have necessary staff and equipment to conduct dye testing and they should be contacted if cross connections with the sanitary sewer are suspected.

TV Inspection of Drainage System

- Closed Circuit Television (CCTV) can be employed to visually identify illicit connections to the industrial storm drainage system. Two types of CCTV systems are available: (1) a small specially designed camera that can be manually pushed on a stiff cable through storm drains to observe the interior of the piping, or (2) a larger remote operated video camera on treads or wheels that can be guided through storm drains to view the interior of the pipe.
- CCTV systems often include a high-pressure water jet and camera on a flexible cable. The water jet cleans debris and biofilm off the inside of pipes so the camera can take video images of the pipe condition.

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- CCTV units can detect large cracks and other defects such as offsets in pipe ends caused by root intrusions or shifting substrate.
- CCTV can also be used to detect dye introduced into the sanitary sewer.
- CCTV inspections require specialized equipment and properly trained staff and are generally best left to specialized contractors or municipal public works staff.

Illegal Dumping

- Substances illegally dumped on streets and into the storm drain systems and creeks may include paints, used oil and other automotive fluids, construction debris, chemicals, fresh concrete, leaves, grass clippings, and pet wastes. These wastes can cause stormwater and receiving water quality problems as well as clog the storm drain system itself.
- Establish a system for tracking incidents. The system should be designed to identify the following:
 - ✓ Illegal dumping hot spots;
 - ✓ Types and quantities (in some cases) of wastes;
 - ✓ Patterns in time of occurrence (time of day/night, month, or year);
 - ✓ Mode of dumping (abandoned containers, "midnight dumping" from moving vehicles, direct dumping of materials, accidents/spills);
 - ✓ An anonymous tip/reporting mechanism; and
 - ✓ Evidence of responsible parties (e.g., tagging, encampments, etc.).
- One of the keys to success of reducing or eliminating illegal dumping is increasing the number of people at the facility who are aware of the problem and who have the tools to at least identify the incident, if not correct it. Therefore, train field staff to recognize and report the incidents.

Once a site has been cleaned:

- Post "No Dumping" signs with a phone number for reporting dumping and disposal.
- Landscaping and beautification efforts of hot spots may also discourage future dumping, as well as provide open space and increase property values.
- Lighting or barriers may also be needed to discourage future dumping.
- See fact sheet SC-11 Spill Prevention, Control, and Cleanup.

Non-Stormwater Discharges SC-10

Inspection

- Regularly inspect and clean up hot spots and other storm drainage areas where illegal dumping and disposal occurs.
- Conduct field investigations of the industrial storm drain system for potential sources of non-stormwater discharges.
- Pro-actively conduct investigations of high priority areas. Based on historical data, prioritize specific geographic areas and/or incident type for pro-active investigations.

Spill and Leak Prevention and Response

- On paved surfaces, clean up spills with as little water as possible. Use a rag for small spills, a damp mop for general cleanup, and absorbent material for larger spills. If the spilled material is hazardous, then the used cleanup materials are also hazardous and must be sent to a certified laundry (rags) or disposed of as hazardous waste.
- Never hose down or bury dry material spills. Sweep up the material and dispose of properly.
- Use adsorbent materials on small spills rather than hosing down the spill. Remove the adsorbent materials promptly and dispose of properly.
- For larger spills, a private spill cleanup company or Hazmat team may be necessary.
- See SC-11 Spill Prevention Control and Cleanup.

Employee Training Program

- Training of technical staff in identifying and documenting illegal dumping incidents is required. The frequency of training must be presented in the SWPPP, and depends on site-specific industrial materials and activities.
- Consider posting a quick reference table near storm drains to reinforce training.
- Train employees to identify non-stormwater discharges and report discharges to the appropriate departments.
- Educate employees about spill prevention and cleanup.
- Well-trained employees can reduce human errors that lead to accidental releases or spills. The employee should have the tools and knowledge to immediately begin cleaning up a spill should one occur. Employees should be familiar with the Spill Prevention Control and Countermeasure Plan. Employees should be able to identify work/jobs with high potential for spills and suggest methods to reduce possibility.
- Determine and implement appropriate outreach efforts to reduce non-permissible non-stormwater discharges.

Non-Stormwater Discharges SC-10

- Conduct spill response drills annually (if no events occurred) in order to evaluate the effectiveness of the plan.
- When a responsible party is identified, educate the party on the impacts of his or her actions.



Quality Assurance and Record Keeping

Performance Evaluation

- Annually review internal investigation results; assess whether goals were met and what changes or improvements are necessary.
- Obtain feedback from personnel assigned to respond to, or inspect for, illicit connections and illegal dumping incidents.
- Develop document and data management procedures.
- A database is useful for defining and tracking the magnitude and location of the problem.
- Report prohibited non-stormwater discharges observed during the course of normal daily activities so they can be investigated, contained, and cleaned up or eliminated.
- Document that non-stormwater discharges have been eliminated by recording tests performed, methods used, dates of testing, and any on-site drainage points observed.
- Annually document and report the results of the program.
- Maintain documentation of illicit connection and illegal dumping incidents, including significant conditionally exempt discharges that are not properly managed.
- Document training activities.

Potential Limitations and Work-Arounds

Some facilities may have space constraints, limited staffing and time limitations that may preclude implementation of BMPs. Provided below are typical limitations and recommended "work-arounds."

- Many facilities do not have accurate, up-to-date 'as-built' plans or drawings which may be necessary in order to conduct non-stormwater discharge assessments.
 - ✓ Online tools such as Google Earth™ can provide an aerial view of the facility and may be useful in understanding drainage patterns and potential sources of non-stormwater discharges
 - ✓ Local municipal jurisdictions may have useful drainage systems maps.

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- Video surveillance cameras are commonly used to secure the perimeter of industrial facilities against break-ins and theft. These surveillance systems may also be useful for capturing illegal dumping activities. Minor, temporary adjustments to the field of view of existing surveillance camera systems to target known or suspected problem areas may be a cost-effective way of capturing illegal dumping activities and identifying the perpetrators.

Potential Capital Facility Costs and Operation & Maintenance Requirements

Facilities

- Capital facility cost requirements may be minimal unless cross-connections to storm drains are detected.
- Indoor floor drains may require re-plumbing if cross-connections are detected.
- Leaky sanitary sewers will require repair or replacement which can have significant costs depending on the size and industrial activity at the facility.

Maintenance (including administrative and staffing)

- The primary effort is for staff time and depends on how aggressively a program is implemented.
- Costs for containment, and disposal of any leak or discharge is borne by the Discharger.
- Illicit connections can be difficult to locate especially if there is groundwater infiltration.
- Illegal dumping and illicit connection violations requires technical staff to detect and investigate them.

Supplemental Information

Permit Requirements

The IGP authorizes certain Non-Storm Water Discharges (NSWDs) provided BMPs are included in the SWPPP and implemented to:

- Reduce or prevent the contact of authorized NSWDs with materials or equipment that are potential sources of pollutants;
- Reduce, to the extent practicable, the flow or volume of authorized NSWDs;
- Ensure that authorized NSWDs do not contain quantities of pollutants that cause or contribute to an exceedance of a water quality standards (WQS); and,

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- Reduce or prevent discharges of pollutants in authorized NSWDs in a manner that reflects best industry practice considering technological availability and economic practicability and achievability."

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Spill Prevention, Control & Cleanup SC-11

Description

Many activities that occur at an industrial or commercial site have the potential to cause accidental spills. Preparation for accidental spills, with proper training and reporting systems implemented, can minimize the discharge of pollutants to the environment.

Spills and leaks are one of the largest contributors of stormwater pollutants. Spill prevention and control plans are applicable to any site at which hazardous materials are stored or used. An effective plan should have spill prevention and response procedures that identify hazardous material storage areas, specify material handling procedures, describe spill response procedures, and provide locations of spill clean-up equipment and materials. The plan should take steps to identify and characterize potential spills, eliminate and reduce spill potential, respond to spills when they occur in an effort to prevent pollutants from entering the stormwater drainage system, and train personnel to prevent and control future spills. An adequate supply of spill clean-up materials must be maintained onsite.

Approach

General Pollution Prevention Protocols

- Develop procedures to prevent/mitigate spills to storm drain systems.
- Develop and standardize reporting procedures, containment, storage, and disposal activities, documentation, and follow-up procedures.
- Establish procedures and/or controls to minimize spills and leaks. The procedures should address:
 - ✓ Description of the facility, owner and address, activities, chemicals, and quantities present;

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	
Nutrients	
Trash	
Metals	✓
Bacteria	
Oil and Grease	✓
Organics	✓

Minimum BMPs Covered

Good Housekeeping	
Preventative Maintenance	
Spill and Leak Prevention and Response	✓
Material Handling & Waste Management	
Erosion and Sediment Controls	
Employee Training Program	✓
Quality Assurance Record Keeping	✓



Spill Prevention, Control & Cleanup SC-11

- ✓ Facility map of the locations of industrial materials;
 - ✓ Notification and evacuation procedures;
 - ✓ Cleanup instructions;
 - ✓ Identification of responsible departments; and
 - ✓ Identify key spill response personnel.
- Recycle, reclaim, or reuse materials whenever possible. This will reduce the amount of process materials that are brought into the facility.



Spill and Leak Prevention and Response

Spill Prevention

- Develop procedures to prevent/mitigate spills to storm drain systems. Develop and standardize reporting procedures, containment, storage, and disposal activities, documentation, and follow-up procedures.
- If illegal dumping is observed at the facility:
 - ✓ Post "No Dumping" signs with a phone number for reporting illegal dumping and disposal. Signs should also indicate fines and penalties applicable for illegal dumping.
 - ✓ Landscaping and beautification efforts may also discourage illegal dumping.
 - ✓ Bright lighting and/or entrance barriers may also be needed to discourage illegal dumping.
- Store and contain liquid materials in such a manner that if the container is ruptured, the contents will not discharge, flow, or be washed into the storm drainage system, surface waters, or groundwater.
- If the liquid is oil, gas, or other material that separates from and floats on water, install a spill control device (such as a tee-section) in the catch basins that collect runoff from the storage tank area.



Preventative Maintenance

- Place drip pans or absorbent materials beneath all mounted taps, and at all potential drip and spill locations during filling and unloading of tanks. Any collected liquids or soiled absorbent materials must be reused/recycled or properly disposed.
- Store and maintain appropriate spill cleanup materials in a location known to all near the tank storage area; and ensure that employees are familiar with the site's spill control plan and/or proper spill cleanup procedures.

Spill Prevention, Control & Cleanup SC-11

- Sweep and clean the storage area monthly if it is paved, *do not hose down the area to a storm drain*.
- Check tanks (and any containment sumps) daily for leaks and spills. Replace tanks that are leaking, corroded, or otherwise deteriorating with tanks in good condition. Collect all spilled liquids and properly dispose of them.
- Label all containers according to their contents (e.g., solvent, gasoline).
- Label hazardous substances regarding the potential hazard (corrosive, radioactive, flammable, explosive, poisonous).
- Prominently display required labels on transported hazardous and toxic materials (per US DOT regulations).
- Identify key spill response personnel.

Spill Response

- Clean up leaks and spills immediately.
- Place a stockpile of spill cleanup materials where it will be readily accessible (e.g., near storage and maintenance areas).
- On paved surfaces, clean up spills with as little water as possible.
 - ✓ Use a rag for small spills, a damp mop for general cleanup, and absorbent material for larger spills.
 - ✓ If the spilled material is hazardous, then the used cleanup materials are also hazardous and must be sent to a certified laundry (rags) or disposed of as hazardous waste.
 - ✓ If possible use physical methods for the cleanup of dry chemicals (e.g., brooms, shovels, sweepers, or vacuums).
- Never hose down or bury dry material spills. Sweep up the material and dispose of properly.
- Chemical cleanups of material can be achieved with the use of adsorbents, gels, and foams. Use adsorbent materials on small spills rather than hosing down the spill. Remove the adsorbent materials promptly and dispose of properly.
- For larger spills, a private spill cleanup company or Hazmat team may be necessary.

Spill Prevention, Control & Cleanup SC-11

Reporting

- Report spills that pose an immediate threat to human health or the environment to the Regional Water Quality Control Board or local authority as location regulations dictate.
- Federal regulations require that any oil spill into a water body or onto an adjoining shoreline be reported to the National Response Center (NRC) at 800-424-8802 (24 hour).
- Report spills to 911 for dispatch and clean-up assistance when needed. Do not contact fire agencies directly.
- Establish a system for tracking incidents. The system should be designed to identify the following:
 - ✓ Types and quantities (in some cases) of wastes;
 - ✓ Patterns in time of occurrence (time of day/night, month, or year);
 - ✓ Mode of dumping (abandoned containers, "midnight dumping" from moving vehicles, direct dumping of materials, accidents/spills);
 - ✓ Clean-up procedures; and
 - ✓ Responsible parties.



Employee Training Program

- Educate employees about spill prevention and cleanup.
- Well-trained employees can reduce human errors that lead to accidental releases or spills:
 - ✓ The employee should have the tools and knowledge to immediately begin cleaning up a spill should one occur; and
 - ✓ Employees should be familiar with the Spill Prevention Control and Countermeasure Plan.
- Employees should be educated about aboveground storage tank requirements. Employees responsible for aboveground storage tanks and liquid transfers should be thoroughly familiar with the Spill Prevention Control and Countermeasure Plan and the plan should be readily available.
- Train employees to recognize and report illegal dumping incidents.

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Other Considerations (Limitations and Regulations)

- State regulations exist for facilities with a storage capacity of 10,000 gallons or more of petroleum to prepare a Spill Prevention Control and Countermeasure (SPCC) Plan (Health & Safety Code Chapter 6.67).
- State regulations also exist for storage of hazardous materials (Health & Safety Code Chapter 6.95), including the preparation of area and business plans for emergency response to the releases or threatened releases.
- Consider requiring smaller secondary containment areas (less than 200 sq. ft.) to be connected to the sanitary sewer, prohibiting any hard connections to the storm drain.

Requirements

Costs (including capital and operation & maintenance)

- Will vary depending on the size of the facility and the necessary controls.
- Prevention of leaks and spills is inexpensive. Treatment and/or disposal of contaminated soil or water can be quite expensive.

Maintenance (including administrative and staffing)

- Develop spill prevention and control plan, provide and document training, conduct inspections of material storage areas, and supply spill kits.
- Extra time is needed to properly handle and dispose of spills, which results in increased labor costs.

Supplemental Information

Further Detail of the BMP

Reporting

Record keeping and internal reporting represent good operating practices because they can increase the efficiency of the facility and the effectiveness of BMPs. A good record keeping system helps the facility minimize incident recurrence, correctly respond with appropriate cleanup activities, and comply with legal requirements. A record keeping and reporting system should be set up for documenting spills, leaks, and other discharges, including discharges of hazardous substances in reportable quantities. Incident records describe the quality and quantity of non-stormwater discharges to the storm sewer. These records should contain the following information:

- Date and time of the incident;
- Weather conditions;
- Duration of the spill/leak/discharge;

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- Cause of the spill/leak/discharge;
- Response procedures implemented;
- Persons notified; and
- Environmental problems associated with the spill/leak/discharge.

Separate record keeping systems should be established to document housekeeping and preventive maintenance inspections, and training activities. All housekeeping and preventive maintenance inspections should be documented. Inspection documentation should contain the following information:

- Date and time the inspection was performed;
- Name of the inspector;
- Items inspected;
- Problems noted;
- Corrective action required; and
- Date corrective action was taken.

Other means to document and record inspection results are field notes, timed and dated photographs, videotapes, and drawings and maps.

Aboveground Tank Leak and Spill Control

Accidental releases of materials from aboveground liquid storage tanks present the potential for contaminating stormwater with many different pollutants. Materials spilled, leaked, or lost from tanks may accumulate in soils or on impervious surfaces and be carried away by stormwater runoff.

The most common causes of unintentional releases are:

- Installation problems;
- Failure of piping systems (pipes, pumps, flanges, couplings, hoses, and valves);
- External corrosion and structural failure;
- Spills and overfills due to operator error; and
- Leaks during pumping of liquids or gases from truck or rail car to a storage tank or vice versa.

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Storage of reactive, ignitable, or flammable liquids should comply with the Uniform Fire Code and the National Electric Code. Practices listed below should be employed to enhance the code requirements:

- Tanks should be placed in a designated area.
- Tanks located in areas where firearms are discharged should be encapsulated in concrete or the equivalent.
- Designated areas should be impervious and paved with Portland cement concrete, free of cracks and gaps, in order to contain leaks and spills.
- Liquid materials should be stored in UL approved double walled tanks or surrounded by a curb or dike to provide the volume to contain 10 percent of the volume of all of the containers or 110 percent of the volume of the largest container, whichever is greater. The area inside the curb should slope to a drain.
- For used oil or dangerous waste, a dead-end sump should be installed in the drain.
- All other liquids should be drained to the sanitary sewer if available. The drain must have a positive control such as a lock, valve, or plug to prevent release of contaminated liquids.
- Accumulated stormwater in petroleum storage areas should be passed through an oil/water separator.

Maintenance is critical to preventing leaks and spills. Conduct routine inspections and:

- Check for external corrosion and structural failure.
- Check for spills and overfills due to operator error.
- Check for failure of piping system (pipes, pumps, flanges, coupling, hoses, and valves).
- Check for leaks or spills during pumping of liquids or gases from truck or rail car to a storage facility or vice versa.
- Visually inspect new tank or container installation for loose fittings, poor welding, and improper or poorly fitted gaskets.
- Inspect tank foundations, connections, coatings, and tank walls and piping system. Look for corrosion, leaks, cracks, scratches, and other physical damage that may weaken the tank or container system.
- Frequently relocate accumulated stormwater during the wet season.

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- Periodically conduct integrity testing by a qualified professional.

Vehicle Leak and Spill Control

Major spills on roadways and other public areas are generally handled by highly trained Hazmat teams from local fire departments or environmental health departments. The measures listed below pertain to leaks and smaller spills at vehicle maintenance shops.

In addition to implementing the spill prevention, control, and clean up practices above, use the following measures related to specific activities:

Vehicle and Equipment Maintenance

- Perform all vehicle fluid removal or changing inside or under cover to prevent the run-on of stormwater and the runoff of spills.
- Regularly inspect vehicles and equipment for leaks, and repair immediately.
- Check incoming vehicles and equipment (including delivery trucks, and employee and subcontractor vehicles) for leaking oil and fluids. Do not allow leaking vehicles or equipment onsite.
- Always use secondary containment, such as a drain pan or drop cloth, to catch spills or leaks when removing or changing fluids.
- Immediately drain all fluids from wrecked vehicles.
- Store wrecked vehicles or damaged equipment under cover.
- Place drip pans or absorbent materials under heavy equipment when not in use.
- Use absorbent materials on small spills rather than hosing down the spill.
- Remove the adsorbent materials promptly and dispose of properly.
- Promptly transfer used fluids to the proper waste or recycling drums. Don't leave full drip pans or other open containers lying around.
- Oil filters disposed of in trashcans or dumpsters can leak oil and contaminate stormwater. Place the oil filter in a funnel over a waste oil recycling drum to drain excess oil before disposal. Oil filters can also be recycled. Ask your oil supplier or recycler about recycling oil filters.
- Store cracked batteries in a non-leaking secondary container. Do this with all cracked batteries, even if you think all the acid has drained out. If you drop a battery, treat it as if it is cracked. Put it into the containment area until you are sure it is not leaking.

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Vehicle and Equipment Fueling

- Design the fueling area to prevent the run-on of stormwater and the runoff of spills:

Cover fueling area if possible.

Use a perimeter drain or slope pavement inward with drainage to a sump.

Pave fueling area with concrete rather than asphalt.

- If dead-end sump is not used to collect spills, install an oil/water separator.
- Install vapor recovery nozzles to help control drips as well as air pollution.
- Discourage "topping-off" of fuel tanks.
- Use secondary containment when transferring fuel from the tank truck to the fuel tank.
- Use absorbent materials on small spills and general cleaning rather than hosing down the area. Remove the absorbent materials promptly.
- Carry out all Federal and State requirements regarding underground storage tanks, or install above ground tanks.
- Do not use mobile fueling of mobile industrial equipment around the facility; rather, transport the equipment to designated fueling areas.
- Keep your Spill Prevention Control and Countermeasure (SPCC) Plan up-to-date.
- Train employees in proper fueling and cleanup procedures.

Industrial Spill Prevention Response

For the purposes of developing a spill prevention and response program to meet the stormwater regulations, facility managers should use information provided in this fact sheet and the spill prevention/response portions of the fact sheets in this handbook, for specific activities.

The program should:

- Integrate with existing emergency response/hazardous materials programs (e.g., Fire Department).
- Develop procedures to prevent/mitigate spills to storm drain systems.
- Identify responsible departments.

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- Develop and standardize reporting procedures, containment, storage, and disposal activities, documentation, and follow-up procedures.
- Address spills at municipal facilities, as well as public areas.
- Provide training concerning spill prevention, response and cleanup to all appropriate personnel.

References and Resources

California's Nonpoint Source Program Plan. <http://www.swrcb.ca.gov/nps/index.html>.

Clark County Storm Water Pollution Control Manual. Available online at: <http://www.co.clark-wa.us/pubworks/bmpman.pdf>.

King County Storm Water Pollution Control Manual. Available online at: <http://dnr.metrokc.gov/wlr/dss/spcm.htm>.

Orange County Stormwater Program, Best Management Practices for Industrial/Commercial Business Activities. Available online at: <http://ocwatersheds.com/documents/bmp/industrialcommercialbusinessactivities>.

Santa Clara Valley Urban Runoff Pollution Prevention Program. <http://www.scvurppp.org>.

The Stormwater Managers Resource Center. <http://www.stormwatercenter.net/>.

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Description

Spills and leaks that occur during vehicle and equipment fueling can contribute hydrocarbons, oil and grease, as well as heavy metals, to stormwater runoff. Implementing the following management practices can help prevent fuel spills and leaks.

Approach

- Reduce potential for pollutant discharge through source control pollution prevention and BMP implementation. Successful implementation depends on effective training of employees on applicable BMPs and general pollution prevention strategies and objectives.

General Pollution Prevention Protocols

- Use properly maintained off-site fueling stations whenever possible. These businesses are better equipped to handle fuel and spills properly.
- Focus pollution prevention activities on containment of spills and leaks, most of which may occur during liquid transfers.



Good Housekeeping

- "Spot clean" leaks and drips routinely. Leaks are not cleaned up until the absorbent is picked up and disposed of properly.
- Manage materials and waste properly (see Material Handling and Waste Management) to reduce adverse impacts on stormwater quality.
- Paint signs on storm drain inlets to indicate that they are not to receive liquid or solid wastes.
- Post signs at sinks to remind employees not to pour wastes down drains.

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	
Nutrients	
Trash	✓
Metals	✓
Bacteria	
Oil and Grease	✓
Organics	✓

Minimum BMPs Covered

Good Housekeeping	✓
Preventative Maintenance	✓
Spill and Leak Prevention and Response	✓
Material Handling & Waste Management	✓
Erosion and Sediment Controls	✓
Employee Training Program	✓
Quality Assurance Record Keeping	✓



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- Clean yard storm drain inlet(s) regularly and especially after large storms.
- Do not pour materials down storm drains.
- Build a shed or temporary roof over fueling area to limit exposure to rain.
- Post signs to remind employees and customers not to top off the fuel tank when filling and signs that ban customers and employees from changing engine oil or other fluids at that location.
- Report leaking vehicles to fleet maintenance.
- Ensure the following safeguards are in place:
 - ✓ Overflow protection devices on tank systems to warn the operator or automatically shut down transfer pumps when the tank reaches full capacity.
 - ✓ Protective guards around tanks and piping to prevent vehicle or forklift damage.
 - ✓ Clear tagging or labeling of all valves to reduce human error.
 - ✓ Emergency shut-off and emergency phone number.



Preventative Maintenance

Fuel Dispensing Areas

- Inspect vehicles and equipment for leaks regularly and repair immediately.
- Sweep the fueling area weekly, if it is paved, to collect loose particles, and wipe up spills with rags and other absorbent material immediately. Do not hose down the area to a storm drain.
- Fit underground storage tanks with spill containment and overflow prevention systems meeting the requirements of Section 2635(b) of Title 23 of the California Code of Regulations.
- Fit fuel dispensing nozzles with "hold-open latches" (automatic shutoffs) except where prohibited by local fire departments.
- Post signs at the fuel dispenser or fuel island warning vehicle owners/operators against "topping off" of vehicle fuel tanks.
- Design fueling area to prevent stormwater runoff and spills. Use a perimeter drain or slope pavement inward with drainage to sump; regularly remove materials accumulated in sump.
- Pave area with concrete rather than asphalt.

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- ❑ Cover fueling area with an overhanging roof structure or canopy so that precipitation cannot come in contact with the fueling area. Where covering is not feasible and the fuel island is surrounded by pavement, apply a suitable sealant that protects the asphalt from spilled fuels.
- ❑ Install vapor recovery nozzles to help control drips as well as air pollution.
- ❑ Use secondary containment when transferring fuel from the tank truck to the fuel tank. Cover storm drains in the vicinity during transfer.

Air/Water Supply Area

- ❑ Minimize the possibility of stormwater pollution from air/water supply areas by doing at least one of the following:
 - ✓ Spot clean leaks and drips routinely to prevent runoff of spillage.
 - ✓ Grade and pave the air/water supply area to prevent run-on of stormwater.
 - ✓ Install a roof over the air/water supply area.
 - ✓ Install a low containment berm around the air/water supply area.

Inspection

- ❑ Aboveground Tank Leak and Spill Control:
 - ✓ Check for external corrosion and structural failure.
 - ✓ Check for spills and overfills due to operator error.
 - ✓ Check for failure of piping system.
 - ✓ Check for leaks or spills during pumping of liquids or gases from truck or rail car to a storage facility or vice versa.
 - ✓ Visually inspect new tank or container installation for loose fittings, poor welding, and improper or poorly fitted gaskets.
 - ✓ Inspect tank foundations, connections, coatings, and tank walls and piping system. Look for corrosion, leaks, cracks, scratches, and other physical damage that may weaken the tank or container system.
 - ✓ Conduct integrity testing periodically by a qualified professional.
- ❑ Inspect and clean, if necessary, storm drain inlets and catch basins within the facility boundary before October 1 each year.

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Spill Response and Prevention Procedures

- ❑ Keep your spill prevention and control plan up-to-date.
- ❑ Maintain an adequate stockpile of spill cleanup materials at locations where it will be readily accessible.
- ❑ Clean leaks, drips, and other spills with as little water as possible.
 - ✓ Use rags for small spills.
 - ✓ Use a damp mop for general cleanup.
 - ✓ Use dry absorbent material for larger spills.
- ❑ Use the following three-step method for cleaning floors:
 - ✓ Clean spills with rags or other absorbent materials
 - ✓ Sweep floor using dry absorbent material
 - ✓ Mop the floor. Mop water may be discharged to the sanitary sewer via a toilet or sink.
- ❑ Remove the adsorbent materials promptly and dispose of properly when using absorbent materials on small spills.
- ❑ Store portable absorbent booms (long flexible shafts or barriers made of absorbent material) in unbermed fueling areas.
- ❑ Report spills promptly.
- ❑ If a dead-end sump is not used to collect spills, install an oil/water separator.



Material Handling and Waste Management

- ❑ Do not pour liquid wastes into floor drains, sinks, outdoor storm drain inlets, or other storm drains or sewer connections.
- ❑ Do not put used or leftover cleaning solutions, solvents, and automotive fluids in the sanitary sewer.
- ❑ Collect leaking or dripping fluids in drip pans or containers. Fluids are easier to recycle if kept separate.
- ❑ Promptly transfer used fluids to the proper waste or recycling drums. Do not leave drip pans or other open containers lying around.

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- ❑ Minimize the possibility of stormwater pollution from outside waste receptacles by doing at least one of the following:
 - ✓ Use only watertight waste receptacle(s) and keep the lid(s) closed.
 - ✓ Grade and pave the waste receptacle area to prevent run-on of stormwater.
 - ✓ Install a roof over the waste receptacle area.
 - ✓ Install a low containment berm around the waste receptacle area.
 - ✓ Use and maintain drip pans under waste receptacles.

- ❑ Post "no littering" signs.



Employee Training Program

- ❑ Educate employees about facility-wide pollution prevention measures and goals.
- ❑ Train designated employees (e.g., those involved with the handling or management of fuels) on proper fueling and cleanup procedures.
- ❑ Train designated employees upon hiring and annually thereafter on proper methods for handling and disposing of waste. Make sure that all employees understand stormwater discharge prohibitions, wastewater discharge requirements, and these best management practices.
- ❑ Ensure that employees are familiar with the site's spill control plan and/or proper spill cleanup procedures.
- ❑ Use a training log or similar method to document training. The training log should include entries for:
 - ✓ Training topic,
 - ✓ Trainer,
 - ✓ Attendees,
 - ✓ Frequency,
 - ✓ Comments,
 - ✓ Target date for completion of training, and
 - ✓ Date completed.

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Quality Assurance and Record Keeping

- ❑ Keep accurate maintenance logs that document minimum BMP activities performed for vehicle and equipment fueling, quantities of materials removed, and improvement actions.
- ❑ Keep accurate logs of spill response actions that document what types of liquids were spilled, how it was cleaned up, and how the waste was disposed.
- ❑ Establish procedures to complete logs and file them in the central office.

Potential Capital Facility Costs and Operation & Maintenance Requirements

Facilities

- ❑ The retrofitting of existing fueling areas to minimize stormwater exposure or spill runoff can be expensive. Good design must occur during the initial installation. Extruded curb along the "upstream" side of the fueling area to prevent stormwater run-on is of modest cost.
- ❑ Capital investments will likely be required at some sites if adequate cover and containment facilities do not exist and can vary significantly depending upon site conditions.

Maintenance

- ❑ Most of the operations and maintenance activities associated with implementing this BMP are integrally linked to routine operations as previously described. Therefore additional O&M is not required.
- ❑ For facilities responsible for pre-treating their wastewater prior to discharging, the proper functioning of structural treatment system is an important maintenance consideration.
- ❑ Routine cleanout of sumps and oil/water separators is required for the devices to maintain their effectiveness, usually at least once a month. During periods of heavy rainfall, cleanout is required more often to ensure pollutants are not washed through the system. Sediment removal is also required on a regular basis to keep the device working efficiently.

Supplemental Information

Designing New Installations

The elements listed below should be included in the design and construction of new or substantially remodeled facilities.

Fuel Dispensing Areas

- ❑ Fuel dispensing areas must be paved with Portland cement concrete (or, equivalent smooth impervious surface), with a 2 to 4% slope to prevent ponding, and must be

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separated from the rest of the site by a grade break that prevents run-on of stormwater to the extent practicable. The fuel dispensing area is defined as extending 6.5 feet from the corner of each fuel dispenser or the length at which the hose and nozzle assembly may be operated plus 1 foot, whichever is less. The paving around the fuel dispensing area may exceed the minimum dimensions of the "fuel dispensing area" stated above.

- ❑ The fuel dispensing area must be covered, and the cover's minimum dimensions must be equal to or greater than the area within the grade break or the fuel dispensing area, as defined above. The cover must not drain onto the fuel dispensing area.
- ❑ If necessary, install and maintain an oil control device in the appropriate catch basin(s) to treat runoff from the fueling area.

Outdoor Waste Receptacle Area

- ❑ Grade and pave the outdoor waste receptacle area to prevent run-on of stormwater to the extent practicable.

Air/Water Supply Area

- ❑ Grade and pave the air/water supply area to prevent run-on of stormwater to the extent practicable.

Designated Fueling Area

- ❑ If your facility has large numbers of mobile equipment working throughout the site and you currently fuel them with a mobile fuel truck, consider establishing a designated fueling area. With the exception of tracked equipment such as bulldozers and perhaps small forklifts, most vehicles should be able to travel to a designated area with little lost time. Place temporary "caps" over nearby catch basins or manhole covers so that if a spill occurs it is prevented from entering the storm drain.

Examples

The Spill Prevention Control and Countermeasure (SPCC) Plan, which is required by law for some facilities, is an effective program to reduce the number of accidental spills and minimize contamination of stormwater runoff.

The City of Palo Alto has an effective program for commercial vehicle service facilities. Many of the program's elements, including specific BMP guidance and lists of equipment suppliers, are also applicable to industrial facilities.

References and Resources

Orange County Stormwater Program, Best Management Practices for Industrial/Commercial Business Activities. Available online at: <http://ocwatersheds.com/documents/bmp/industrialcommercialbusinessactivities>.

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Sacramento County Environmental Management Stormwater Program: Best Management Practices -Vehicle Washing. Available online at: <http://www.emd.sacounty.net/EnvHealth/Stormwater/Stormwater-BMPs.html>.

Santa Clara Valley Urban Runoff Pollution Prevention Program. <http://www.scvurppp-wq.com/>.

US EPA. National Pollutant Discharge Elimination System - Stormwater Menu of BMPs - Municipal Vehicle and Equipment Washing. Available online at: <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=browse&Rliston=detail&bmp=134>.

Washington State Department of Ecology, 2012. *Vehicle and Equipment Washwater Discharges Best Management Practices Manual*. Publication no. WQ-R-95-056. Available online at: <https://fortress.wa.gov/ecy/publications/publications/95056.pdf>.

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Description

Wash water from vehicle and equipment cleaning activities performed outdoors or in areas where wash water flows onto the ground can contribute toxic hydrocarbons and other organic compounds, oils and greases, nutrients, phosphates, heavy metals, and suspended solids to stormwater runoff. Use of the procedures outlined below can prevent or reduce the discharge of pollutants to stormwater during vehicle and equipment cleaning.

Approach

Reduce potential for pollutant discharge through source control pollution prevention and BMP implementation. Successful implementation depends on effective training of employees on applicable BMPs and general pollution prevention strategies and objectives.

General Pollution Prevention Protocols

- ❑ If possible, use properly maintained off-site commercial washing and steam cleaning businesses whenever possible. These businesses are better equipped to handle and properly dispose of the wash waters.
- ❑ Use dry cleaning methods to remove debris and sweep area; avoid washing with water when possible.
- ❑ Good housekeeping practices can minimize the risk of contamination from wash water discharges.
- ❑ Use biodegradable, phosphate-free detergents for washing vehicles as appropriate.
- ❑ Emphasize the connection between the storm drain system and runoff, help reinforce that vehicle and equipment washing activities affect local water quality through storm drain stenciling programs.

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	✓
Nutrients	✓
Trash	✓
Metals	✓
Bacteria	✓
Oil and Grease	✓
Organics	✓

Minimum BMPs Addressed

Good Housekeeping	✓
Preventative Maintenance	✓
Spill and Leak Prevention and Response	✓
Material Handling & Waste Management	✓
Erosion and Sediment Controls	✓
Employee Training Program	✓
Quality Assurance Record Keeping	✓



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- ❑ Map on-site storm drain locations to avoid discharges to the storm drain system.
- ❑ Designate specific wash area with clarifier or place wash areas away from storm drain connections.



Good Housekeeping

- ❑ Mark the area clearly as a wash area by:
 - ✓ Posting signs stating that only washing is allowed in wash area; and
 - ✓ Providing information on how washing is to be done.
- ❑ Provide trash containers in wash area.
- ❑ Have all vehicle and equipment washing done in areas designed to collect and hold the wash and rinse water or effluent generated. Recycle, collect or treat wash water effluent prior to discharge to the sanitary sewer system.
- ❑ If washing/cleaning must occur on-site, consider washing vehicles and equipment inside the building or on an impervious surface to control the targeted constituents by directing them to the sanitary sewer.
- ❑ If washing must occur on-site and outdoor:
 - ✓ Use designated paved wash areas. This area must be covered or bermed to collect the wash water and graded to direct the wash water to a treatment or disposal facility.
 - ✓ Do not conduct oil changes and other engine maintenance in the designated washing area. Perform these activities in a place designated for oil change and maintenance activities.
 - ✓ Cover the wash area when not in use to prevent contact with rain water.
- ❑ Do not permit steam cleaning wash water to enter the storm drain system.
- ❑ If possible, conduct pressure and steam cleaning at appropriate off-site areas to avoid generating runoff with high pollutant concentrations.



Preventative Maintenance

- ❑ Install sumps or drain lines to collect wash water for treatment.
- ❑ Use hoses with nozzles that automatically turn off when left unattended.
- ❑ Perform routine inspections of drain lines, holding tanks, and hoses and repair leaks immediately.

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- Perform routine inspection and maintenance of wash water recycling and treatment systems.



Spill Response and Prevention Procedures

- Keep the spill prevention and control plan up-to-date.
- Have an emergency plan, equipment, and trained personnel ready at all times to deal immediately with major spills.
- Collect all spilled liquids and properly dispose of them.
- Store and maintain appropriate spill cleanup materials in a location known to all near the designated wash area.



Material Handling and Waste Management

- Collect all wash water from vehicle and equipment cleaning operations. Consider treating and reusing or discharging wash waters to a sanitary sewer system.
- Large quantities of wash waters may require treatment at the facility. Treatment using a process treatment system (e.g., holding tank, filtration system, and related appurtenances) will require engineering and capital expenditures.
- Collect and treat small amounts of wash water at the facility and either recycle or discharge to the sanitary sewer system or collect and dispose of as an industrial waste.
- Discharge wash waters into sanitary sewer only after contacting local sewer authority to find out if pretreatment is required.



Employee Training Program

- Train employees on proper cleaning and wash water disposal procedures and conduct "refresher" courses on a regular basis.
- Train staff on proper maintenance measures for the wash area.
- Train employees and contractors on proper spill containment and cleanup. The employee should have the tools and knowledge to immediately begin cleaning up a spill should one occur.
- Use a training log or similar method to document training.



Quality Assurance and Record Keeping

- Keep accurate maintenance/inspection logs that document the minimum BMP activities performed for vehicle and equipment cleaning activities and improvement actions.

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- Keep accurate logs of spill response actions that document what was spilled, how it was cleaned up, and how the waste was disposed.
- Establish procedures to complete logs and file them in the central office.

Other Facility-Specific Considerations

- Some municipalities may require pretreatment and monitoring of wash water discharges to the sanitary sewer.
- Steam cleaning can generate significant pollutant concentrations requiring that careful consideration be given to the environmental impacts and compliance issues related to the condensate wastewater generated.

Potential Limitations and Work-Arounds

Some facilities may have space constraints, limited staffing and time limitations that may preclude implementation of certain BMPs. Provided below are typical limitations and recommended "work-arounds":

- Most car washing best management practices are inexpensive, and rely more on good housekeeping practices (where vehicles are washed, planning for the collection of wash water) than on expensive technology. However, the construction of a specialized area for vehicle washing can be expensive. Also, for facilities that cannot recycle their wash water, the cost of pre-treating wash water through either structural practices or planning for collection and hauling of contaminated water to sewage treatment plants can be cost-prohibitive.
- A potential work-around is to use properly maintained off-site commercial washing and steam cleaning businesses whenever possible.

Potential Capital Facility Costs and Operation & Maintenance Requirements

Facilities

- Many facilities will already have indoor covered areas where vehicle and equipment cleaning takes place and will require no additional capital expenditures for providing cover.
- Capital investments will be required at some sites if systems to collect and recycle/treat and properly discharge wash water are not in place. The cost associated with these investments will vary depending on the size of the washing facility and local regulations regarding effluent wash water.

Maintenance

- Perform wash and collection system inspections and repair.
- Sweep washing areas frequently to remove solid debris.

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- Repair berms and dikes as necessary.
- Inspect and maintain sumps, oil/water separators, and on-site treatment/recycling units.

Supplemental Information

Designated Cleaning Areas

- Washing operations outside should be conducted in a designated wash area having the following characteristics:
 - ✓ Paved with Portland cement concrete
 - ✓ Covered and bermed to prevent contact with stormwater and contain wash water
 - ✓ Sloped for wash water collections
 - ✓ Drainage system for wash water to the sanitary or recycle treatment process waste sewer, or to a dead-end sump equipped with an oil/water separator if necessary.

References and Resources

Orange County Stormwater Program, Best Management Practices for Industrial/Commercial Business Activities. Available online at: <http://ocwatersheds.com/documents/hmp/industrialcommercialbusinessactivities>.

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Vehicle and Equipment Cleaning SC-21

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Vehicle and Equipment Repair SC-22

Description

Vehicle or equipment maintenance and repair are potentially significant sources of stormwater pollution, due to use of harmful materials and wastes during maintenance and repair processes. Engine repair and service (e.g., parts cleaning), replacement of fluids (e.g., oil change), and outdoor equipment storage and parking (leaking vehicles) can impact water quality if stormwater runoff from areas with these activities becomes polluted by a variety of contaminants. Implementation of the following activities must be done where applicable to prevent or reduce the discharge of pollutants to stormwater from vehicle and equipment maintenance and repair activities.

Approach

The BMP approach is to reduce the potential for pollutant discharges through source control pollution prevention and BMP implementation. Successful implementation depends on effective training of employees on applicable BMPs and general pollution prevention strategies and objectives. General pollution prevention protocols are presented followed by applicable minimum BMPs as required by the Industrial General Permit.

General Pollution Prevention Protocols

- Designate a vehicle maintenance area designed to prevent stormwater pollution.
- Minimize contact of stormwater with outside operations through berming and appropriate drainage routing.
- Keep accurate maintenance logs to evaluate materials removed and improvements made.
- Switch to non-toxic chemicals for maintenance when possible.
- Choose cleaning agents that can be recycled.
- Use drop cloths and drip pans.

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	
Nutrients	
Trash	
Metals	✓
Bacteria	
Oil and Grease	✓
Organics	✓

Minimum BMPs Covered

Good Housekeeping	✓
Preventative Maintenance	✓
Spill and Leak Prevention and Response	✓
Material Handling & Waste Management	✓
Erosion and Sediment Controls	
Employee Training Program	✓
Quality Assurance	
Record Keeping	✓



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- Minimize use of solvents. Clean parts without using solvents whenever possible, or use water-based solvents for cleaning.
- Recycle used motor oil, diesel oil, and other vehicle fluids and parts whenever possible.

Operational Protocols

General

- Move maintenance and repair activities indoors whenever feasible.
- Place curbs around the immediate boundaries of process equipment.

Good Housekeeping

- Store idle equipment under cover
- Use a vehicle maintenance area designed to prevent stormwater pollution - minimize contact of stormwater with outside operations through berming and appropriate drainage routing.
- Avoid hosing down your work areas. If work areas are washed, collect and direct wash water to sanitary sewer. Use dry sweeping if possible.
- Paint signs on storm drain inlets to indicate that they are not to receive liquid or solid wastes.
- Post signs at sinks to remind employees not to pour wastes down drains.
- Clean yard storm drain inlets(s) regularly and especially after large storms.
- Do not pour materials down storm drains.
- Cover the work area to limit exposure to rain.
- Place curbs around the immediate boundaries of process equipment.
- Build a shed or temporary roof over areas where parked cars await repair or salvage, especially wrecked vehicles. Build a roof over vehicles kept for parts.

Preventive Maintenance and Repair Activities

- Provide a designated area for vehicle maintenance.
- Inspect vehicles and equipment for leaks regularly and repair immediately.
- Make sure incoming vehicles are checked for leaking oil and fluids. Do not allow leaking vehicles or equipment on-site without correcting the source of the leak and cleaning up any spill.
- Keep equipment clean; don't allow excessive build-up of oil and grease.

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- Perform all vehicle fluid removal or changing inside or under cover if possible to prevent the run-on of stormwater and the runoff of spills.
- Use a tarp, ground cloth, or drip pans beneath the vehicle or equipment to capture all spills and drips if temporary work is being conducted outside. Collected drips and spills must be disposed, reused, or recycled properly.
- It is important to sweep the maintenance area weekly, if it is paved, to collect loose particles, and wipe up spills with rags and other absorbent material immediately. Do not hose down the area to a storm drain.
- Establish standard procedures to prevent spillage/leakage of fluids including:
 - ✓ Keep a drip pan under the vehicle while you unclip hoses, unscrew filters, or remove other parts. Use a drip pan under any vehicle that might leak while working on it to keep splatters or drips off the shop floor.
 - ✓ Promptly transfer used fluids to the proper waste or recycling drums. Do not leave drip pans or other open containers lying around.
 - ✓ Keep drip pans or containers under vehicles or equipment that may drip during repairs.
 - ✓ Do not change motor oil or perform equipment maintenance in non-appropriate areas.
- Drain oil and other fluids first if the vehicle or equipment is to be stored outdoors. Elevate and tarp stored vehicles and equipment.
- Monitor parked vehicles closely for leaks. Pans should be placed under any leaks to collect the fluids for proper disposal or recycling.
- Mechanics should clean vehicle parts without using liquid cleaners wherever possible to reduce waste.
- Steam cleaning and pressure washing may be used instead of solvent parts cleaning. The wastewater generated from steam cleaning must be discharged to an on-site oil water separator that is connected to a sanitary sewer or blind sump. Non-caustic detergents should be used instead of caustic cleaning agents, detergent-based or water-based cleaning systems in place of organic solvent degreasers, and non-chlorinated solvent in place of chlorinated organic solvents for parts cleaning. Refer to SC21 for more information on steam cleaning.
- Fifth-wheel bearings on trucks require routine lubrication. Typically chassis grease is applied to the fifth-wheel bearing at rates that result in grease dripping off of the bearing into the environment. To address this concern the following options are available:
 - ✓ Use specialized lubricants with good adhesion (e.g., stay in place) properties. Carefully follow manufacturer's label regarding the use of adhesive lubricant for

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truck fifth-wheels. Typically this means applying no more than 8 oz. of grease. No visible extrusion of lubricant from the fifth-wheel bearing when truck and trailer are connected should be present.

- ✓ Use on-board truck or on-board trailer automatic lubrication systems. If these systems apply lube thinner than National Grease Lubrication Institute #2, equipment for collection of used lubricant is needed to prevent excess lubricant from dripping off the truck.
- ✓ Use plastic or Teflon plates instead of grease or other lubricants. Carefully follow manufacturer's instructions for installation and operation.
- Use one of the following for lubricating vehicle-trailer coupling:
 - ✓ Specialized adhesive lubricants;
 - ✓ Grease-free fifth wheel slip plates (e.g., plastic or Teflon coatings); and
 - ✓ On-Board automatic lubricating systems.

Spill and Leak Prevention and Response Procedures

- Keep your spill prevention and control plan up-to-date.
- Place an adequate stockpile of spill cleanup materials where it will be readily accessible.
- Clean leaks, drips, and other spills with as little water as possible. Use rags for small spills, a damp mop for general cleanup, and dry absorbent material for larger spills. Use the following three-step method for cleaning floors:
 - ✓ Clean spills with rags or other absorbent materials;
 - ✓ Sweep floor using dry absorbent material; and
 - ✓ Mop the floor.
- Mop water may be discharged to the sanitary sewer via a toilet or sink.
- Remove the adsorbent materials promptly and dispose of properly when using adsorbent materials on small spills.

Material Handling and Waste Management

- Designate a special area to drain and replace motor oil, coolant, and other fluids, where there are no connections to the storm drain or the sanitary sewer, and drips and spills can be easily cleaned up.
- Drain all fluids immediately from wrecked vehicles. Ensure that the drain pan or drip pan is large enough to contain drained fluids (e.g., larger pans are needed to contain antifreeze, which may gush from some vehicles).

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- ❑ Do not pour liquid waste to floor drains, sinks, outdoor storm drain inlets, or other storm drains or sewer connections.
- ❑ Do not put used or leftover cleaning solutions, solvents, and automotive fluids and in the sanitary sewer.
- ❑ Collect leaking or dripping fluids in drip pans or containers. Fluids are easier to recycle if kept separate.
- ❑ Promptly transfer used fluids to the proper waste or recycling drums. Do not leave drip pans or other open containers lying around.
- ❑ Place oil filter in a funnel over a waste oil recycling drum to drain excess oil before disposal since municipalities prohibit or discourage disposal of these items in solid waste facilities.
- ❑ Oil filters can also be recycled. Ask your oil supplier or recycler about recycling oil filters. Oil filters disposed of in trashcans or dumpsters can leak oil and contaminate stormwater.
- ❑ Store cracked batteries in a non-leaking secondary container and dispose of properly at recycling or household hazardous waste facilities.



Employee Training Program

- ❑ Train employees and contractors in the proper handling and disposal of engine fluids and waste materials.
- ❑ Employees should have the tools and knowledge to immediately begin cleaning up a spill should one occur.
- ❑ Conduct annual training to ensure that employees are familiar with the facility's spill control plan and/or proper spill cleanup procedures (You can use reusable cloth rags to clean up small drips and spills instead of disposables; these can be washed by a permitted industrial laundry. Do not clean them at home or at a coin-operated laundry business).
- ❑ Use a training log or similar method to document training.



Quality Assurance and Recordkeeping

- ❑ Keep accurate maintenance logs to evaluate materials removed and improvements made.
- ❑ Establish procedures to collect and file maintenance logs in the central office.

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Other Facility-Specific Considerations

Parts Cleaning

Vehicle and equipment maintenance facilities often must clean parts as a part of day-to-day operations. The following activities should be considered:

- ❑ Clean vehicle parts without using liquid cleaners wherever possible to reduce waste.
- ❑ Steam cleaning and pressure washing may be used instead of solvent parts cleaning.
- ❑ Wastewater generated from steam cleaning must be discharged to an on-site oil water separator that is connected to a sanitary sewer or blind sump.
- ❑ Use non-caustic detergents instead of caustic cleaning agents, detergent-based or water-based cleaning systems in place of organic solvent degreasers, and non-chlorinated solvent in place of chlorinated organic solvents for parts cleaning. Refer to SC21 for more information on steam cleaning.

Potential Limitations and Work-Arounds

- ❑ Some facilities may have space constraints and time limitations that may preclude all work from being conducted indoors.
 - ✓ Designate specific areas for outdoor activities.
 - ✓ Require employees to understand and follow preventive maintenance and spill and leak prevention BMPs.
- ❑ It may not be possible to contain and clean up spills from vehicles/equipment brought on-site after working hours.
 - ✓ Provide a designated area for afterhours deliveries.
 - ✓ Install spill kits.
- ❑ Drain pans (usually 1 ft. x 1 ft.) are generally too small to contain antifreeze
 - ✓ Purchase or fabricate large drip pans (3 ft. x 3 ft.) with sufficient volume to contain expected quantities of liquids based on equipment/vehicle specifications.
- ❑ Dry floor cleaning methods may not be sufficient for some spills.
 - ✓ Use three-step method instead.
- ❑ Identification of engine leaks may require some use of solvents.
 - ✓ Minimize the use of solvents and use drip pans to collect spills and leaks.
- ❑ Prices for recycled materials and fluids may be higher than those of non-recycled materials.

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- ❑ Some facilities may be limited by a lack of providers of recycled materials, and by the absence of businesses to provide services such as hazardous waste removal, structural treatment practice maintenance, or solvent equipment and solvent recycling.

Potential Facilities and Maintenance Requirements

Facilities Requirements

- ❑ For facilities that already have covered areas where maintenance takes place, berms or other means to retain spills and leaks, and/ have other appropriate constructed systems for containment, there may not need to be any significant new capital investment. Capital costs will likely be required at some sites if adequate cover and containment facilities do not exist and can vary significantly depending upon site conditions.



Maintenance Requirements

- ❑ Most of the operations and maintenance activity associated with implementing this BMP are integrally linked to routine operations as previously described. Therefore, significant additional operations and maintenance efforts are not likely to be required.
- ❑ For facilities responsible for pre-treating their wastewater prior to discharging, the proper functioning of structural treatment system is an important maintenance consideration. Routine cleanout of oil and grease is required for the devices to maintain their effectiveness, usually at least once a month. During periods of heavy rainfall, cleanout is required more often to ensure pollutants are not washed through the trap. Sediment removal is also required on a regular basis to keep the device working efficiently.
- ❑ It is important to sweep the maintenance area weekly, if it is paved, to collect loose particles, and wipe up spills with rags and other absorbent material immediately. Do not hose down the area to a storm drain.

Supplemental Information

Waste Reduction

Parts are often cleaned using solvents such as trichloroethylene, 1,1,1-trichloroethane or methylene chloride. Many of these cleaners are harmful and must be disposed of as a hazardous waste. Cleaning without using liquid cleaners (e.g., wire brush) whenever possible reduces waste. Prevent spills and drips of solvents and cleansers to the shop floor. Do all liquid cleaning at a centralized station so the solvents and residues stay in one area. Locate drip pans, drain boards, and drying racks to direct drips back into a solvent sink or fluid holding tank for reuse. Reducing the number of solvents makes recycling easier and reduces hazardous waste management costs. Often, one solvent can perform a job as well as two different solvents.

- ❑ Clean parts without using liquid cleaners whenever possible to reduce waste.
- ❑ Prevent spills and drips of solvents and cleansers to the shop floor.

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- ❑ Do all liquid cleaning at a centralized station so the solvents and residues stay in one area.
- ❑ Locate drip pans, drain boards, and drying racks to direct drips back into a solvent sink or fluid holding tank for reuse.

Recycling

Separating wastes allows for easier recycling and may reduce treatment costs. Keep hazardous and non-hazardous wastes separate, do not mix used oil and solvents, and keep chlorinated solvents (e.g., 1,1,1-trichloroethane) separate from non-chlorinated solvents (e.g., kerosene and mineral spirits).

Many products made of recycled (i.e., refined or purified) materials are available. Engine oil, transmission fluid, antifreeze, and hydraulic fluid are available in recycled form. Buying recycled products supports the market for recycled materials.

- ❑ Recycling is always preferable to disposal of unwanted materials.
- ❑ Separate wastes for easier recycling. Keep hazardous and non-hazardous wastes separate, do not mix used oil and solvents, and keep chlorinated solvents separate from non-chlorinated solvents.
- ❑ Label and track the recycling of waste material (e.g., used oil, spent solvents, batteries).
- ❑ Purchase recycled products to support the market for recycled materials.

Safer Alternatives

If possible, eliminate or reduce the amount of hazardous materials and waste by substituting non-hazardous or less hazardous material:

- ❑ Use non-caustic detergents instead of caustic cleaning for parts cleaning.
- ❑ Use detergent-based or water-based cleaning systems in place of organic solvent degreasers. Wash water may require treatment before it can be discharged to the sewer.
- ❑ Replace chlorinated organic solvents with non-chlorinated solvents. Non-chlorinated solvents like kerosene or mineral spirits are less toxic and less expensive to dispose of properly. Check list of active ingredients to see whether it contains chlorinated solvents.
- ❑ Choose cleaning agents that can be recycled.

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Outdoor Liquid Container Storage SC-31

Description

Accidental releases of materials from above ground liquid storage tanks, drums, and dumpsters present the potential for contaminating stormwater with many different pollutants. Tanks may store many potential stormwater runoff pollutants, such as gasoline, aviation gas, diesel fuel, kerosene, oils, greases, lubricants and other distilled, blended and refined products derived from crude petroleum. Materials spilled, leaked, or lost from storage tanks may accumulate in soils or on other surfaces and be carried away by rainfall runoff. These source controls apply to containers located outside of a building used to temporarily store liquid materials and include installing safeguards against accidental releases, installing secondary containment, conducting regular inspections, and training employees in standard operating procedures and spill cleanup techniques.

Approach

General Pollution Prevention Protocols

- ❑ Educate employees about pollution prevention measures and goals.
- ❑ Keep an accurate, up-to-date inventory of the materials delivered and stored on-site.
- ❑ Try to keep chemicals in their original containers, and keep them well labeled.
- ❑ Develop an operations plan that describes procedures for loading and/or unloading. Refer to SC-30 Outdoor Loading/Unloading of Materials for more detailed BMP information pertaining to loading and unloading of liquids.
- ❑ Protect materials from rainfall, run-on, runoff, and wind dispersal:
 - ✓ Cover the storage area with a roof.

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize

Targeted Constituents

Sediment	
Nutrients	✓
Trash	
Metals	✓
Bacteria	
Oil and Grease	✓
Organics	✓

Minimum BMPs Covered

6.1 Good Housekeeping	
6.2 Preventative Maintenance	✓
6.3 Spill and Leak Prevention and Response	✓
6.4 Material Handling & Waste Management	✓
6.5 Erosion and Sediment Controls	
6.6 Employee Training Program	✓
6.7 Quality Assurance Record Keeping	✓



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- ✓ Minimize stormwater run-on by enclosing the area or building a berm around it.
- ✓ Use a walled structure for storage of liquid containers.
- ✓ Use only watertight containers and keep the lids closed.
- ❑ Employ safeguards against accidental releases:
 - ✓ Provide overflow protection devices to warn operator or automatic shutdown transfer pumps.
 - ✓ Provide protection guards (bollards) around tanks and piping to prevent damage from a vehicle or forklift.
 - ✓ Provide clear tagging or labeling, and restrict access to valves to reduce human error.
 - ✓ Berm or surround tank or container with secondary containment system, including dikes, liners, vaults, or double walled tanks.
 - ✓ Be aware and ready to address the fact that some municipalities require secondary containment areas to be connected to the sanitary sewer, prohibiting any hard connections to the storm drain.
 - ✓ Contact the appropriate regulatory agency regarding environmental compliance for facilities with "spill ponds" designed to intercept, treat, and/or divert spills.
 - ✓ Have registered and specifically trained professional engineers identify and correct potential problems such as loose fittings, poor welding, and improper or poorly fitted gaskets for newly installed tank systems.
- ❑ Use MSDSs to ID hazardous components and keep incompatible products apart and to list/have available appropriate PPE and clean-up products.



Good Housekeeping

- ❑ Provide storage tank piping located below product level with a shut-off valve at the tank; ideally this valve should be an automatic shear valve with the shut-off located inside the tank.
- ❑ Provide barriers such as posts or guardrails, where tanks are exposed, to prevent collision damage with vehicles.
- ❑ Provide secure storage to prevent vandalism-caused contamination.
- ❑ Place tight-fitting lids on containers.

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- ❑ Enclose or cover the containers where they are stored.
- ❑ Raise the containers off the ground by use of pallet or similar method, with provisions for spill control.
- ❑ Do not store liquid containers near the storm drainage system or surface waters.
- ❑ Sweep and clean the storage area regularly if it is paved, do not hose down the area to a storm drain.



Preventative Maintenance

- ❑ Inspect storage areas regularly for leaks or spills.
- ❑ Conduct routine inspections and check for external corrosion of material containers. Also check for structural failure, spills and overfills due to operator error, failure of piping system.
- ❑ Check for leaks or spills during pumping of liquids or gases from truck or rail car to a storage facility or vice versa.
- ❑ Visually inspect new tank or container installations for loose fittings, poor welding, and improper or poorly fitted gaskets.
- ❑ Inspect tank foundations, connections, coatings, and tank walls and piping system. Look for corrosion, leaks, cracks, scratches, and other physical damage that may weaken the tank or container system.
- ❑ Replace containers that are leaking, corroded, or otherwise deteriorating with ones in good condition. If the liquid chemicals are corrosive, containers made of compatible materials must be used instead of metal drums.
- ❑ New or secondary containers must be labeled with the product name and hazards.



Spill Response and Prevention Procedures

- ❑ Keep your spill prevention and control plan up-to-date.
- ❑ Maintain an adequate stockpile of spill cleanup materials at locations where it will be readily accessible.
- ❑ Have an emergency plan, equipment, and trained personnel ready at all times to deal immediately with major spills.
- ❑ Collect spilled liquids and properly dispose of them.
- ❑ Remove the adsorbent materials promptly and dispose of properly when using adsorbent materials on small spills.
- ❑ Have employees trained in emergency spill cleanup procedures present when dangerous waste, liquid chemicals, or other wastes are delivered.

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- ❑ Prevent operator errors by using engineering safeguards and thus reducing accidental releases of pollutants.



Material Handling and Waste Management

- ❑ Contain the material in such a manner that if the container leaks or spills, the contents will not discharge, flow, or be washed into the storm drainage system, surface waters or groundwater.
- ❑ Place drip pans or absorbent materials beneath mounted container taps, and at potential drip and spill locations during filling and unloading of containers. Any collected liquids or soiled absorbent materials must be reused/recycled or properly disposed.
- ❑ Ensure that any underground or aboveground storage tanks are designed and managed in accordance with applicable regulations, identified as a potential pollution source, and have secondary containment such as a berm or dike with an impervious surface.
- ❑ Do not pour liquids into floor drains, sinks, outdoor storm drain inlets, or other storm drains or sewer connections.
- ❑ Collect leaking or dripping fluids in drip pans or containers. Fluids are easier to recycle if kept separate.
- ❑ Promptly transfer used fluids to the proper waste or recycling drums. Do not leave drip pans or other open containers lying around.



Employee Training Program

- ❑ Train employee (e.g., fork lift operators) and contractors in proper spill containment and cleanup. The employee should have the tools and knowledge to immediately begin cleaning up a spill if one should occur.
- ❑ Train employees in proper spill response and prevention, materials handling, and waste management.
- ❑ Use a training log or similar method to document training.



Quality Assurance and Record Keeping

- ❑ Keep accurate maintenance/inspection logs that document minimum BMP activities performed for liquid container storage and improvement actions.
- ❑ Keep accurate logs of spill response actions that document what was spilled, how it was cleaned up, and how the waste was disposed.
- ❑ Establish procedures to complete logs and file them in the central office.

Other Facility-Specific Considerations

- ❑ Storage sheds often must meet building and fire code requirements.

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- ❑ The local fire district must be consulted for limitations on clearance of roof covers over containers used to store flammable materials.
- ❑ All specific standards set by Federal and State laws concerning the storage of oil and hazardous materials must be met.
- ❑ Storage of reactive, ignitable, or flammable liquids should comply with the Uniform Fire Code and the National Electric Code.
- ❑ Storage of oil and hazardous materials must meet specific Federal and State standards including:
 - ✓ Spill Prevention Control and Countermeasure Plan (SPCC) Plan;
 - ✓ Secondary containment;
 - ✓ Integrity and leak detection monitoring; and
 - ✓ Emergency preparedness plans.

Potential Capital Facility Costs and Operation & Maintenance Requirements

Facilities

- ❑ Capital investments such as sheds, covers, dikes, and curbs will likely be required at some sites if adequate cover and containment facilities do not exist and can vary significantly depending upon site conditions.

Maintenance

- ❑ Most of the operations and maintenance activities associated with implementing this BMP are integrally linked to routine operations as previously described. Therefore additional O&M is not required.
- ❑ Conduct regular inspections and make repairs and improvements as necessary.
- ❑ Conduct regular broom dry-sweeping of area. Do not wash with water.

Supplemental Information

The most common causes of unintentional releases are:

- ❑ Installation problems;
- ❑ Failure of piping systems (pipes, pumps, flanges, couplings, hoses, and valves);
- ❑ External corrosion and structural failure;
- ❑ Spills and overfills due to operator error; and
- ❑ Leaks during pumping of liquids or gases from truck or rail car to a storage tank or vice versa.

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Aboveground Tank Leak and Spill Control

Storage of reactive, ignitable, or flammable liquids should comply with the Uniform Fire Code and the National Electric Code. Practices listed below should be employed to enhance the code requirements:

- ❑ Tanks should be placed in a designated area.
- ❑ Tanks located in areas where firearms are discharged should be encapsulated in concrete or the equivalent.
- ❑ Designated areas should be paved with Portland cement concrete, free of cracks and gaps, and impervious in order to contain leaks and spills.
- ❑ Liquid materials should be stored in UL approved double walled tanks or surrounded by a curb or dike to provide the volume to contain 10% of the volume of the containers or 110% of the volume of the largest container, whichever is greater. The area inside the curb should slope to a drain.
- ❑ For used oil or dangerous waste, a dead-end sump should be installed in the drain.
- ❑ Other liquids should be drained to the sanitary sewer if available. The drain must have a positive control such as a lock, valve, or plug to prevent release of contaminated liquids.
- ❑ Accumulated stormwater in petroleum storage areas should be passed through an oil/water separator.

Maintenance is critical to preventing leaks and spills. Conduct routine weekly inspections and:

- ❑ Check for external corrosion and structural failure.
- ❑ Check for spills and overfills due to operator error.
- ❑ Check for failure of piping system (pipes, pumps, flanger, coupling, hoses, and valves).
- ❑ Check for leaks or spills during pumping of liquids or gases from truck or rail car to a storage facility or vice versa.
- ❑ Inspect new tank or container installation visually for loose fittings, poor welding, and improper or poorly fitted gaskets.
- ❑ Inspect tank foundations, connections, coatings, and tank walls and piping system. Look for corrosion, leaks, cracks, scratches, and other physical damage that may weaken the tank or container system.
- ❑ Frequently release accumulated stormwater during the wet season.
- ❑ Have periodic integrity testing conducted by a qualified professional.

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Dikes

One of the best protective measures against contamination of stormwater is the use of dikes. Containment dikes are berms or retaining walls that are designed to hold spills. Use of dikes is an effective pollution prevention measure for above ground storage tanks and railcar or tank truck loading and unloading areas. The dike surrounds the area of concern and holds the spill, keeping spill materials separated from the stormwater side of the dike area. Diking can be used in any industrial or municipal facility, but it is most commonly used for controlling large spills or releases from liquid storage areas and liquid transfer areas.

- ❑ For single-wall tanks, containment dikes should be large enough to hold the contents of the storage tank for the facility plus rain water.
- ❑ For trucks, diked areas should be capable of holding an amount equal to the volume of the tank truck compartment. Diked construction material should be strong enough to safely hold spilled materials.
- ❑ Dike materials can consist of earth, concrete, synthetic materials, metal, or other impervious materials.
- ❑ Strong acids or bases may react with metal containers, concrete, and some plastics.
- ❑ Where strong acids or bases are stored, alternative dike materials should be considered. More active organic chemicals may need certain special liners for dikes.
- ❑ Dikes may also be designed with impermeable materials to increase containment capabilities.
- ❑ Dikes should be inspected during or after significant storms or spills to check for washouts or overflows.
- ❑ Regular checks of containment dikes to insure the dikes are capable of holding spills should be conducted.
- ❑ Inability of a structure to retain stormwater, dike erosion, soggy areas, or changes in vegetation indicate problems with dike structures. Damaged areas should be patched and stabilized immediately.
- ❑ Earthen dikes may require special maintenance of vegetation such as mulching and irrigation.
- ❑ Remove accumulated stormwater after precipitation events and dispose of according to local regulations.

Curbing

Curbing is a barrier that surrounds an area of concern. Curbing is similar to containment diking in the way that it prevents spills and leaks from being released into the environment. Curbing is usually small scaled and does not contain large spills to the degree that dikes can. Curbing is common at many facilities in small areas where

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Outdoor Liquid Container Storage SC-31

handling and transfer of liquid materials occur. Curbing can redirect contaminated stormwater away from the storage area. It is useful in areas where liquid materials are transferred from one container to another. Asphalt is a common material used for curbing; however, curbing materials can include earth, concrete, synthetic materials, metal, or other impenetrable materials.

- ❑ Spilled materials should be removed immediately from curbed areas to allow space for future spills.
- ❑ Curbs should have manually-controlled pump systems rather than common drainage systems for collection of spilled materials.
- ❑ The curbed area should be inspected regularly to clear clogging debris.
- ❑ Maintenance should also be conducted frequently to prevent overflow of any spilled materials as curbed areas are designed only for smaller spills.
- ❑ Remove accumulated stormwater after precipitation events and dispose of according to local regulations.
- ❑ Curbing has the following advantages:
 - ✓ Excellent run-on control;
 - ✓ Inexpensive;
 - ✓ Ease of installment;
 - ✓ Provides option to recycle materials spilled in curb areas; and
 - ✓ Common industry practice.

References and Resources

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Outdoor Equipment Operations SC-32

Description

Outside process equipment operations and maintenance can contaminate stormwater runoff. Activities, such as grinding, painting, coating, sanding, degreasing or parts cleaning, landfills and waste piles, and solid waste treatment and disposal are examples of process operations that can lead to contamination of stormwater runoff. The targeted constituents will vary for each site depending on the operation being performed.

Approach

Implement source control BMPs to limit exposure of outdoor equipment to direct precipitation and stormwater run-on. Refer to SC-22 Vehicle and Equipment Repair for additional information.

General Pollution Prevention Protocols

- ❑ Perform the activity during dry periods whenever possible.
- ❑ Install secondary containment measures where leaks and spills may occur.
- ❑ Use non-toxic chemicals for maintenance and minimize or eliminate the use of solvents.
- ❑ Connect process equipment area to public sanitary sewer or facility wastewater treatment system when possible. Some jurisdictions require that secondary containment areas be connected to the sanitary sewer, prohibiting any hard connections to the storm drain.

Good Housekeeping

- ❑ Manage materials and waste properly (see Material Handling and Waste Management) to reduce adverse impacts on stormwater quality.

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize

Targeted Constituents

Sediment	✓
Nutrients	✓
Trash	✓
Metals	✓
Bacteria	✓
Oil and Grease	✓
Organics	✓

Minimum BMPs Covered

Good Housekeeping	✓
Preventative Maintenance	✓
Spill and Leak Prevention and Response	✓
Material Handling & Waste Management	✓
Erosion and Sediment Controls	✓
Employee Training Program	✓
Quality Assurance Record Keeping	✓

Outdoor Equipment Operations SC-32

- ❑ Cover the work area with a permanent roof if possible.
- ❑ Use drop cloths for sanding and painting operations.
- ❑ Use a vacuum for fine particle clean-up in pavement cracks and crevices.
- ❑ Minimize contact of stormwater with outside process equipment operations through berming and drainage routing (run-on prevention).
- ❑ "Spot clean" leaks and drips routinely. Leaks are not cleaned up until the absorbent is picked up and disposed of properly.
- ❑ Paint signs on storm drain inlets to indicate that they are not to receive liquid or solid wastes.
- ❑ Use roll down or permanent walls when windy/breezy to prevent wind transport of particulates/pollutants.

Preventative Maintenance

- ❑ Design outdoor equipment areas to prevent stormwater runoff and spills. Use a perimeter drain or slope pavement inward with drainage to sump.
- ❑ Dry clean the work area regularly. Do not wash outdoor equipment with water if there is a direct connection to the storm drain.
- ❑ Pave area with concrete rather than asphalt.
- ❑ Inspect outdoor equipment regularly for leaks or spills. Also check for structural failure, spills and overfills due to operator error, and/or failure of piping system.
- ❑ Inspect and clean, if necessary, storm drain inlets and catch basins within the outdoor equipment area before October 1 each year.

Spill Response and Prevention Procedures

- ❑ Keep your Spill Prevention Control and Countermeasure (SPCC) Plan up-to-date.
- ❑ Have employees trained in emergency spill cleanup procedures present when dangerous waste, liquid chemicals, or other wastes are delivered.
- ❑ Place a stockpile of spill cleanup materials where it will be readily accessible.
- ❑ Prevent operator errors by using engineering safe guards and thus reducing accidental releases of pollutant.

Material Handling and Waste Management

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Outdoor Equipment Operations SC-32

- ❑ Do not pour liquid wastes into floor drains, sinks, outdoor storm drain inlets, or other storm drain or sewer connections.
- ❑ Collect leaking or dripping fluids in drip pans or containers. Fluids are easier to recycle if kept separate.
- ❑ Promptly transfer used fluids to the proper waste or recycling drums. Do not leave drip pans or other open containers lying around.
- ❑ Minimize the possibility of stormwater pollution from outside waste receptacles by doing at least one of the following:
 - ✓ Use only watertight waste receptacle(s) and keep the lid(s) closed.
 - ✓ Grade and pave the waste receptacle area to prevent run-on of stormwater.
 - ✓ Install a roof over the waste receptacle area.



Employee Training Program

- ❑ Educate employees about pollution prevention measures and goals.
- ❑ Train employees on proper equipment operation and maintenance procedures.
- ❑ Train all employees upon hiring and annually thereafter on proper methods for handling and disposing of waste. Ensure that all employees understand stormwater discharge prohibitions, wastewater discharge requirements, and these best management practices.
- ❑ Use a training log or similar method to document training.
- ❑ Ensure that employees are familiar with the site's spill control plan and/or proper spill cleanup procedures.



Quality Assurance and Record Keeping

- ❑ Keep accurate maintenance logs that document minimum BMP activities performed for outdoor equipment, types and quantities of materials removed and disposed of, and any improvement actions.
- ❑ Keep accurate logs of spill response actions that document what was spilled, how it was cleaned up, and how the waste was disposed.
- ❑ Establish procedures to complete logs and file them in the central office.

Potential Limitations and Work-Arounds

Some facilities may have space constraints, limited staffing and time limitations that may preclude implementation of BMPs. Provided below are typical limitations and recommended "work-arounds."

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Outdoor Equipment Operations SC-32

- ❑ Providing cover over outdoor equipment may be impractical or cost-prohibitive.
 - ✓ Operate outdoor equipment only during periods of dry weather.
- ❑ Regular operations and time limitations may require outdoor activities during wet weather.
 - ✓ Designate specific areas for outdoor activities.
 - ✓ Allow time for work area clean-up after each shift.
 - ✓ Require employees to understand and follow preventive maintenance and spill and leak prevention BMPs.
 - ✓ Design and install secondary containment and good housekeeping BMPs for outdoor equipment area.
- ❑ Storage sheds often must meet building and fire code requirements.

Potential Capital Facility Costs and Operation & Maintenance Requirements

Facilities

- ❑ Many facilities will already have indoor covered areas where vehicle and equipment repairs take place and will require no additional capital expenditures.
- ❑ If outdoor activities are required, construction of berms or other means to retain spills and leaks may require appropriate constructed systems for containment. These containment areas may require significant new capital investment.
- ❑ Capital investments will likely be required at some sites if adequate cover and containment facilities do not exist and can vary significantly depending upon site conditions.

Maintenance

- ❑ Most of the operations and maintenance activities associated with implementing this BMP are integrally linked to routine operations as previously described. Therefore additional O&M is not required.
- ❑ For facilities responsible for pre-treating their wastewater prior to discharging, the proper functioning of structural treatment system is an important maintenance consideration.
- ❑ Routine cleanout of oil and grease is required for the devices to maintain their effectiveness, usually at least once a month. During periods of heavy rainfall, cleanout is required more often to ensure pollutants are not washed through the trap. Sediment removal is also required on a regular basis to keep the device working efficiently.

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Outdoor Equipment Operations SC-32

References and Resources

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Outdoor Storage of Raw Materials SC-33

Description

Stockpiles of raw materials, by-products, and finished products exposed to rain and/or runoff can pollute stormwater. Stormwater can become contaminated when materials wash off or dissolve into water due to improper storage and containment. To prevent or reduce the discharge of pollutants to stormwater from raw material delivery and storage, pollution prevention and source control measures must be implemented, such as minimizing the storage of hazardous materials on-site, enclosing or covering materials, storing materials in a designated area, installing secondary containment, conducting regular inspections, preventing stormwater run-on and runoff, and training employees and subcontractors. This fact sheet focuses on source control BMPs for stockpiles of solid materials; if the raw material, by-product, or product is a liquid, more information for outside storage of liquids can be found under SC-31 Outdoor Liquid Container Storage.

Approach

Reduce potential for pollutant discharge through source control pollution prevention and BMP implementation. Successful implementation depends on effective training of employees on applicable BMPs and general pollution prevention strategies and objectives.

General Pollution Prevention Protocols

- ❑ Emphasize employee education for successful BMP implementation.
- ❑ Store materials that could contaminate stormwater inside or under permanent cover. If this is not feasible, then all outside storage areas should be covered with a roof and bermed or enclosed to prevent stormwater contact.
- ❑ Elevate and tarp solid materials such as beams, metal, etc.
- ❑ Minimize the inventory of raw materials kept outside.

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize

Targeted Constituents

Sediment	✓
Nutrients	✓
Trash	
Metals	✓
Bacteria	
Oil and Grease	✓
Organics	✓

Minimum BMPs Covered

Good Housekeeping	✓
Preventative Maintenance	✓
Spill and Leak Prevention and Response	✓
Material Handling & Waste Management	
Erosion and Sediment Controls	✓
Employee Training Program	✓
Quality Assurance Record Keeping	✓



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Outdoor Storage of Raw Materials SC-33

- Keep an accurate, up-to-date inventory of the materials delivered and stored on-site.
- Stormwater runoff that could potentially be contaminated by materials stored outdoors should be drained to the sanitary sewer if available. The drain must have a positive control such as a lock, valve, or plug to prevent release of contaminated liquids.



Good Housekeeping

- If raw materials cannot all be stored inside or under permanent cover, prevent exposure to direct precipitation and stormwater run-on by installing a storm-resistant waterproof covering made of polyethylene, polypropylene or hypalon over all materials stored outside. The covers must be in place at all times when work with the stockpiles is not occurring (Applicable to small stockpiles only).
- Implement erosion control practices at the perimeter of the facility site and at any catch basins to prevent erosion of the stockpiled material off-site, if the stockpiles are so large that they cannot feasibly be covered and contained.
- Minimize stormwater run-on by enclosing the area or building a berm around it.
- Keep storage areas clean and dry.
- Slope paved areas in a manner that minimizes pooling of water on the site, particularly with materials that may leach pollutants into stormwater and/or groundwater, such as compost, logs, and wood chips. A minimum slope of 1.5% is recommended.
- Secure drums stored in an area where unauthorized persons may not gain access to prevent accidental spillage, pilferage, or any unauthorized use.
- Install curbing or berms along the perimeter of the area to prevent the run-on of uncontaminated stormwater from adjacent areas as well as runoff of stormwater from the stockpile areas.
- Slope the area inside the curb or berm to a drain with sump. The sump should be equipped with an oil and water separator if applicable for materials stored onsite.
- Do not store materials on top of or directly adjacent to storm drain inlets.
- Cover wood products treated with chromated copper arsenate, ammoniacal copper zinc arsenate, creosote, or pentachlorophenol with properly secured tarps or store indoors.



Preventative Maintenance

- Maintain outdoor storage containers in good condition. Replace leaky or otherwise inadequate containers as necessary.
- Maintain outdoor waterproof covers (e.g., tarps) in good condition and properly secure them to be storm resistant. Replace tarps damaged by UV exposure or wear and tear on a regular basis.

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Outdoor Storage of Raw Materials SC-33

- Perform routine inspection of storm drains and sumps and regularly remove accumulated materials.
- Dry clean the work area regularly. Do not wash outdoor material storage areas with water if there is a direct connection to the storm drain.
- Pave outdoor storage areas for liquids such as solvents with concrete rather than asphalt.
- Conduct regular inspections of storage areas so that leaks and spills are detected as soon as possible.
- Routinely inspect berms, curbing, containment, and sediment controls for proper function and repair as necessary.



Spill and Leak Prevention and Response

- Keep the facility spill prevention and control plan up-to-date.
- Place a stockpile of spill cleanup materials, such as brooms, dustpans, and vacuum sweepers (if desired) near the storage area where it will be readily accessible.
- Have employees trained in spill containment and cleanup present during the loading/unloading of hazardous or otherwise dangerous materials.



Erosion and Sediment Controls

- Keep materials covered to prevent erosion of stockpiles. This may not be feasible for large stockpiles.
- Install sediment controls such as fiber rolls around the perimeter of stockpiles to prevent transport of raw materials to the storm drain.
- Install drain inlet protection around all inlets to prevent raw materials from entering storm drain.
- Install sediment controls such as silt fence around the perimeter of the site to prevent transport of raw materials to the storm drain or offsite surface waters.



Employee Training Program

- Educate employees about pollution prevention measures and goals.
- Train employees how to properly store outdoor raw materials using the source control BMPs described above.
- Use a training log or similar method to document training.
- Ensure that employees are familiar with the site's spill control plan and/or proper spill cleanup procedures.

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Quality Assurance and Record Keeping

- Keep accurate maintenance logs that document minimum BMP activities performed for outdoor storage of raw materials, types and quantities of materials removed and disposed of, and any improvement actions.
- Keep accurate logs of spill response actions that document what was spilled, how it was cleaned up, and how the waste was disposed.
- Establish procedures to complete logs and file them in the central office.

Other Facility-Specific Considerations

- Storage sheds often must meet building and fire code requirements. Storage of reactive, ignitable, or flammable liquids must comply with the Uniform Fire Code and the National Electric Code.
- Some municipalities require that secondary containment areas (regardless of size) be connected to the sanitary sewer, prohibiting any hard connections to the storm drain.
- The local fire district must be consulted for limitations on clearance of roof covers over containers used to store flammable materials.

Potential Limitations and Work-Arounds

Some facilities may have space constraints, limited staffing and time limitations that may preclude implementation of BMPs. Provided below are typical limitations and recommended "work-arounds"

- Space limitations may preclude storing all materials indoors.
 - ✓ Implement good housekeeping, preventative maintenance, and erosion and sediment controls as described above.

Potential Capital Facility Costs and Operation & Maintenance Requirements

Facilities

- Many facilities will already have indoor covered areas where raw materials will be stored and will require no additional capital expenditures.
- If outdoor storage of materials is required, construction of berms or other means to prevent stormwater run-on and runoff may require appropriate constructed systems for containment. These containment areas may require significant new capital investment.
- Purchase and installation of erosion and sediment controls will require additional capital investments, and this amount will vary depending on site characteristics.
- Capital investments will likely be required at some sites if adequate cover and containment facilities do not exist and can vary significantly depending upon site conditions.

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Outdoor Storage of Raw Materials SC-33

Maintenance

- Accurate and up-to-date inventories should be kept of all stored materials.
- Berms and curbs may require periodic repair and patching.
- Parking lots or other surfaces near bulk materials storage areas should be swept periodically to remove debris blown or washed from storage areas.
- Sweep paved storage areas regularly for collection and disposal of loose solid materials, do not hose down the area to a storm drain or conveyance ditch.
- Erosion and sediment controls require regular inspection and periodic replacement or reinstallation.

Supplemental Information

Raw Material Containment

Paved areas should be sloped in a manner that minimizes pooling of water on the site, particularly with materials that may leach pollutants into stormwater and/or groundwater, such as compost, logs, and wood chips. A minimum slope of 1.5% is recommended.

- Curbing or berms should be placed along the perimeter of the area to prevent the run-on of uncontaminated stormwater from adjacent areas as well as runoff of stormwater from stockpile areas.
- The storm drainage system should be designed to minimize use of catch basins in the interior of the area as they tend to rapidly fill with manufacturing material.

The area should be sloped to drain stormwater to the perimeter where it can be collected or to internal drainage alleyways where material is not stockpiled.

The "doghouse" design has been used to store small liquid containers. The roof and flooring design prevent contact with direct rain or runoff. The doghouse has two solid structural walls and two canvas covered walls. The flooring is wire mesh about secondary containment.

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Waste Handling & Disposal SC-34

Description

Improper storage and handling of solid wastes can allow toxic compounds, oils and greases, heavy metals, nutrients, suspended solids, and other pollutants to enter stormwater runoff. The discharge of pollutants to stormwater from waste handling and disposal can be prevented and reduced by tracking waste generation, storage, and disposal; reducing waste generation and disposal through source reduction, reuse, and recycling; and preventing run-on and runoff.

Approach

Reduce potential for pollutant discharge through source control pollution prevention and BMP implementation. Successful implementation depends on effective training of employees on applicable BMPs and general pollution prevention strategies and objectives.

General Pollution Prevention Protocols

- Accomplish reduction in the amount of waste generated using the following source controls:
 - ✓ Production planning and sequencing;
 - ✓ Process or equipment modification;
 - ✓ Raw material substitution or elimination;
 - ✓ Loss prevention and housekeeping;
 - ✓ Waste segregation and separation; and
 - ✓ Close loop recycling.
- Establish a material tracking system to increase awareness about material usage. This may reduce spills and minimize contamination, thus reducing the amount of waste produced.
- Recycle materials whenever possible.

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment

Nutrients

Trash

Metals

Bacteria

Oil and Grease

Organics

Minimum BMPs Covered

- Good Housekeeping
- Preventative Maintenance
- Spill and Leak Prevention and Response
- Material Handling & Waste Management
- Erosion and Sediment Controls
- Employee Training Program
- Quality Assurance Record Keeping



Waste Handling & Disposal SC-34

- Use the entire product before disposing of the container.
- To the extent possible, store wastes under cover or indoors after ensuring all safety concerns such as fire hazard and ventilation are addressed.
- Provide containers for each waste stream at each work station. Allow time after shift to clean area.



Good Housekeeping

- Cover storage containers with leak proof lids or some other means. If waste is not in containers, cover all waste piles (plastic tarps are acceptable coverage) and prevent stormwater run-on and runoff with a berm. The waste containers or piles must be covered except when in use.
- Use drip pans or absorbent materials whenever grease containers are emptied by vacuum trucks or other means. Grease cannot be left on the ground. Collected grease must be properly disposed of as garbage.
- Dispose of rinse and wash water from cleaning waste containers into a sanitary sewer (if allowed by the local sewer authority). Do not discharge wash water to the street or storm drain. Clean in a designated wash area that drains to a clarifier.
- Transfer waste from damaged containers into safe containers.
- Take special care when loading or unloading wastes to minimize losses. Loading systems can be used to minimize spills and fugitive emission losses such as dust or mist. Vacuum transfer systems can minimize waste loss.
- Keep the waste management area clean at all times by sweeping and cleaning up spills immediately.
- Use dry methods when possible (e.g., sweeping, use of absorbents) when cleaning around restaurant/food handling dumpster areas. If water must be used after sweeping/using absorbents, collect water and discharge through grease interceptor to the sewer.
- Stencil or demarcate storm drains on the facility's property with prohibitive message regarding waste disposal.
- Cover waste piles with temporary covering material such as reinforced tarpaulin, polyethylene, polyurethane, polypropylene or hypalon.
- If possible, move the activity indoor after ensuring all safety concerns such as fire hazard and ventilation are addressed.



Preventative Maintenance

- Prevent stormwater run-on from entering the waste management area by enclosing the area or building a berm around the area.
- Prevent waste materials from directly contacting rain.

Waste Handling & Disposal SC-34

- Cover waste piles with temporary covering material such as reinforced tarpaulin, polyethylene, polyurethane, polypropylene or hypalon.
- Cover the area with a permanent roof if feasible.
- Cover dumpsters to prevent rain from washing waste out of holes or cracks in the bottom of the dumpster.
- Check waste containers weekly for leaks and to ensure that lids are on tightly. Replace any that are leaking, corroded, or otherwise deteriorating.
- Sweep and clean the waste management area regularly. Use dry methods when possible (e.g., sweeping, vacuuming, use of absorbents) when cleaning around restaurant/food handling dumpster areas. If water must be used after sweeping/using absorbents, collect water and discharge through grease interceptor to the sewer.
- Inspect and replace faulty pumps or hoses regularly to minimize the potential of releases and spills.
- Repair leaking equipment including valves, lines, seals, or pumps promptly.



Spill Response and Prevention Procedures

- Keep your spill prevention and plan up-to-date.
- Have an emergency plan, equipment and trained personnel ready at all times to deal immediately with major spills.
- Collect all spilled liquids and properly dispose of them.
- Store and maintain appropriate spill cleanup materials in a location known to all near the designated wash area.
- Ensure that vehicles transporting waste have spill prevention equipment that can prevent spills during transport. Spill prevention equipment includes:
 - ✓ Vehicles equipped with baffles for liquid waste; and
 - ✓ Trucks with sealed gates and spill guards for solid waste.



Material Handling and Waste Management

Litter Control

- Post "No Littering" signs and enforce anti-litter laws.
- Provide a sufficient number of litter receptacles for the facility.
- Clean out and cover litter receptacles frequently to prevent spillage.

Waste Collection

- Keep waste collection areas clean.

Waste Handling & Disposal SC-34

- ❑ Inspect solid waste containers for structural damage regularly. Repair or replace damaged containers as necessary.
- ❑ Secure solid waste containers; containers must be closed tightly when not in use.
- ❑ Do not fill waste containers with washout water or any other liquid.
- ❑ Ensure that only appropriate solid wastes are added to the solid waste container. Certain wastes such as hazardous wastes, appliances, fluorescent lamps, pesticides, etc., may not be disposed of in solid waste containers (see chemical/hazardous waste collection section below).
- ❑ Do not mix wastes; this can cause chemical reactions, make recycling impossible, and complicate disposal. Affix labels to all waste containers.

Chemical/Hazardous Wastes

- ❑ Select designated hazardous waste collection areas on-site.
- ❑ Store hazardous materials and wastes in covered containers and protect them from vandalism.
- ❑ Place hazardous waste containers in secondary containment.
- ❑ Make sure that hazardous waste is collected, removed, and disposed of only at authorized disposal areas.
- ❑ Hazardous waste cannot be reused or recycled; it must be disposed of by a licensed hazardous waste hauler.

Employee Training Program

- ❑ Educate employees about pollution prevention measures and goals.
- ❑ Train employees how to properly handle and dispose of waste using the source control BMPs described above.
- ❑ Train employees and subcontractors in proper hazardous waste management.
- ❑ Use a training log or similar method to document training.
- ❑ Ensure that employees are familiar with the site's spill control plan and/or proper spill cleanup procedures.

Quality Assurance and Record Keeping

- ❑ Keep accurate maintenance logs that document minimum BMP activities performed for waste handling and disposal, types and quantities of waste disposed of, and any improvement actions.
- ❑ Keep accurate logs of spill response actions that document what was spilled, how it was cleaned up, and how the waste was disposed.

Waste Handling & Disposal SC-34

- ❑ Establish procedures to complete logs and file them in the central office.

Potential Capital Facility Costs and Operation & Maintenance Requirements

Facilities

- ❑ Capital costs will vary substantially depending on the size of the facility and the types of waste handled. Significant capital costs may be associated with reducing wastes by modifying processes or implementing closed-loop recycling.
- ❑ Many facilities will already have indoor covered areas where waste materials will be stored and will require no additional capital expenditures for providing cover.
- ❑ If outdoor storage of wastes is required, construction of berms or other means to prevent stormwater run-on and runoff may require appropriate constructed systems for containment.
- ❑ Capital investments will likely be required at some sites if adequate cover and containment facilities do not exist and can vary significantly depending upon site conditions.

Maintenance

- ❑ Check waste containers weekly for leaks and to ensure that lids are on tightly. Replace any that are leaking, corroded, or otherwise deteriorating.
- ❑ Sweep and clean the waste management area regularly. Use dry methods when possible (e.g., sweeping, use of absorbents) when cleaning around restaurant/food handling dumpster areas. If water must be used after sweeping/using absorbents, collect water and discharge through grease interceptor to the sewer.
- ❑ Inspect and replace faulty pumps or hoses regularly to minimize the potential of releases and spills.
- ❑ Repair leaking equipment including valves, lines, seals, or pumps promptly.

References and Resources

Minnesota Pollution Control Agency, *Industrial Stormwater Best Management Practices Guidebook*. Available online at: <http://www.pca.state.mn.us/index.php/view-document.html?id=10557>.

New Jersey Department of Environmental Protection, 2013. *Basic Industrial Stormwater General Permit Guidance Document NJPDES General Permit No. NJ0088315*, Revised. Available online at: http://www.nj.gov/dep/dwg/pdf/5G2_guidance_color.pdf.

Orange County Stormwater Program, *Best Management Practices for Industrial/Commercial Business Activities*. Available online at: <http://ocwatersheds.com/documents/bmp/industrialcommercialbusinessactivities>.

Waste Handling & Disposal SC-34

Oregon Department of Environmental Quality, 2013. *Industrial Stormwater Best Management Practices Manual- BMP 26 Fueling and Liquid Loading/Unloading Operations*. Available online at: <http://www.deq.state.or.us/wq/wqpermit/docs/InjBMP021413.pdf>.

Sacramento Stormwater Management Program. *Best Management Practices for Industrial Storm Water Pollution Control*. Available online at: <http://www.msa.sacounty.net/sactostormwater/documents/guides/Industrial-BMP-manual.pdf>.

Sacramento County Environmental Management Stormwater Program: Best Management Practices. Available online at: <http://www.emd.sacounty.net/EnvHealth/Stormwater/Stormwater-BMPs.html>.

Santa Clara Valley Urban Runoff Pollution Prevention Program. <http://www.scvurppp-w2k.com/>

US EPA. National Pollutant Discharge Elimination System – Industrial Fact Sheet Series for Activities Covered by EPA's Multi Sector General Permit. Available online at: <http://cfpub.epa.gov/npdes/stormwater/swsectors.cfm>.

Safer Alternative Products SC-35

Description

Promote the use of less harmful products and products that contain little or no TMDL and 303(d) list pollutants. Alternatives exist for most product classes including chemical fertilizers, pesticides, cleaning solutions, janitorial chemicals, automotive and paint products, and consumables (batteries, fluorescent lamps).

Approach

Pattern a new program after the many established programs around the state and country. Integrate this best management practice as much as possible with existing programs at your facility.

Develop a comprehensive program based on:

- ❑ The "Precautionary Principle," which is an alternative to the "Risk Assessment" model that says it's acceptable to use a potentially harmful product until physical evidence of its harmful effects are established and deemed too costly from an environmental or public health perspective. For instance, a risk assessment approach might say it's acceptable to use a pesticide until there is direct proof of an environmental impact. The Precautionary Principle approach is used to evaluate whether a given product is safe, whether it is really necessary, and whether alternative products would perform just as well.
- ❑ Environmentally Preferable Purchasing Program to minimize the purchase of products containing hazardous ingredients used in the facility's custodial services, fleet maintenance, and facility maintenance in favor of using alternate products that pose less risk to employees and to the environment.
- ❑ Integrated Pest Management (IPM) or Less-Toxic Pesticide Program, which uses a pest management approach that minimizes the use of toxic chemicals and gets rid of pests

Objectives

- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	
Nutrients	✓
Trash	
Metals	✓
Bacteria	
Oil and Grease	✓
Organics	✓

Minimum BMPs Covered

Good Housekeeping	
Preventative Maintenance	
Spill and Leak Prevention and Response	
Material Handling & Waste Management	
Erosion and Sediment Controls	
Employee Training Program	✓
Quality Assurance Record Keeping	QA



by methods that pose a lower risk to employees, the public, and the environment.

- ❑ Energy Efficiency Program including no-cost and low-cost energy conservation and efficiency actions that can reduce both energy consumption and electricity bills, along with long-term energy efficiency investments.

Consider the following mechanisms for developing and implementing a comprehensive program:

- ❑ Policies
- ❑ Procedures
 - ✓ Standard operating procedures (SOPs);
 - ✓ Purchasing guidelines and procedures; and
 - ✓ Bid packages (services and supplies).
- ❑ Materials
 - ✓ Preferred or approved product and supplier lists;
 - ✓ Product and supplier evaluation criteria;
 - ✓ Training sessions and manuals; and
 - ✓ Fact sheets for employees.

Implement this BMP in conjunction with the Vehicle and Equipment Management fact sheets (SC-20 – SC-22) and SC-41 Building and Grounds Maintenance.

Employee Training Program

- ❑ Employees who handle potentially harmful materials should be trained in the use of safer alternatives.
- ❑ Purchasing departments should be trained on safer alternative products and encouraged to procure less hazardous materials and products that contain little or no harmful substances or TMDL pollutants.
- ❑ Employees and contractors / service providers can both be educated about safer alternatives by using information developed by a number of organizations including the references and resources provided in this fact sheet.

Potential Limitations and Work-Arounds

Some facilities may have space constraints, limited staffing and time limitations that may preclude implementation of BMPs. Provided below are typical limitations and recommended "work-arounds"

- ❑ Alternative products may not be available, suitable, or effective in every case.

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- ✓ Minimize use of hazardous/harmful products if no alternative product is available.

Regulatory Considerations

This BMP has no regulatory requirements unless local/municipal ordinance applies. Existing regulations already encourage facilities to reduce the use of hazardous materials through incentives such as reduced:

- ❑ Specialized equipment storage and handling requirements;
- ❑ Storm water runoff sampling requirements;
- ❑ Training and licensing requirements; and
- ❑ Record keeping and reporting requirements.

Cost Considerations

- ❑ The primary cost is for staff time to: 1) develop new policies and procedures and 2) educate purchasing departments and employees who handle potentially harmful materials about the availability, procurement, and use of safer alternatives.
- ❑ Some alternative products may be slightly more expensive than conventional products.

Supplemental Information

The following discussion provides some general information on safer alternatives. More specific information on particular hazardous materials and the available alternatives may be found in the references and resources listed below.

- ❑ Automotive products – Less toxic alternatives are not available for many automotive products, especially engine fluids. But there are alternatives to grease lubricants, car polishes, degreasers, and windshield washer solution. Refined motor oil is also available.
- ❑ Vehicle/Trailer lubrication – Fifth wheel bearings on trucks require routine lubrication. Adhesive lubricants are available to replace typical chassis greases.
- ❑ Cleaners – Vegetables-based or citrus-based soaps are available to replace petroleum-based soaps/detergents.
- ❑ Paint products – Water-based paints, wood preservatives, stains, and finishes with low VOC content are available.
- ❑ Pesticides – Specific alternative products or methods exist to control most insects, fungi, and weeds.
- ❑ Chemical Fertilizers – Compost and soil amendments are natural alternatives.
- ❑ Consumables – Manufacturers have either reduced or are in the process of reducing the amount of heavy metals in consumables such as batteries and fluorescent lamps.

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All fluorescent lamps contain mercury, however low-mercury containing lamps are now available from most hardware and lighting stores. Fluorescent lamps are also more energy efficient than the average incandescent lamp.

- ❑ Janitorial chemicals – Even biodegradable soap can harm fish and wildlife before it biodegrades. Biodegradable does not mean non-toxic. Safer products and procedures are available for floor stripping and cleaning, as well as carpet, glass, metal, and restroom cleaning and disinfecting. Use paper products with post-consumer recycled content and implement electric had dryers.

Examples

There are a number of business and trade associations, and communities with effective programs. Some of the more prominent are listed below in the references and resources section.

References and Resources

Note: Many of these references provide alternative products for materials that typically are used inside and disposed to the sanitary sewer as well as alternatives to products that usually end up in the storm drain.

General Sustainable Practices and Pollution Prevention Including Pollutant-Specific Information

California Department of Toxic Substances Control,
<http://www.dtsc.ca.gov/PollutionPrevention/GreenTechnology/Index.cfm>.

CalRecycle, <http://www.calrecycle.ca.gov/Business/Regulated.htm>.

City of Santa Monica Office of Sustainability and Environment,
<http://www.smgov.net/departments/ose/>.

City of Palo Alto, <http://www.city.palo-alto.ca.us/cleanbay>.

City and County of San Francisco, Department of the Environment,
<http://www.sfenvironment.org/toxics-health/greener-business-practices>.

Green Business Program, <http://www.greenbiz.ca.gov/GRIlocal.html>.

Product Stewardship Institute, <http://www.productstewardship.us/index.cfm>.

Sacramento Clean Water Business Partners,
<http://www.sacstormwater.org/CleanWaterBusinessPartners/CleanWaterBusinessPartners.html>.

USEPA. National Pollutant Discharge Elimination System (NPDES) Stormwater Discharges From Industrial Facilities,
<http://cfpub.epa.gov/npdes/stormwater/indust.cfm>.

USEPA Region IX Pollution Prevention Program,
<http://www.epa.gov/region9/waste/p2/business.html>.

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Western Sustainability and Pollution Prevention Network, <http://wsppn.org/>.

Metals (mercury, copper)

National Electrical Manufacturers Association – Environmental Stewardship,
<http://www.nema.org/Policy/Environmental-Stewardship/pages/default.aspx>.

Sustainable Conservation, <http://www.suscon.org>.

Auto Recycling Project

Brake Pad Partnership

Pesticides and Chemical Fertilizers

Bio-Integral Resource Center, <http://www.birc.org>.

California Department of Pesticide Regulation,
<http://www.cdpr.ca.gov/dprprograms.htm>.

University of California Statewide IPM Program,
<http://www.ipm.ucdavis.edu/default.html>.

Dioxins

Bay Area Dioxins Project,
http://www.abag.ca.gov/bayarea/dioxin/project_materials.htm.

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Contaminated or Erodible Areas SC-40

Description

Areas within an industrial site that are bare of vegetation or are subject to activities that promote the suppression of vegetation are often subject to erosion. In addition, they may or may not be contaminated from past or current activities. If the area is temporarily bare because of construction, see SC-42 Building Repair, Remodeling, and Construction. Sites with excessive erosion or the potential for excessive erosion should consider employing the soil erosion BMPs identified in the Construction BMP Handbook. Note that this fact sheet addresses soils that do not exceed hazardous waste criteria (see Title 22 California Code of Regulations for Hazardous Waste Criteria).

Approach

Reduce potential for pollutant discharge through source control pollution prevention and BMP implementation. Successful implementation depends on effective training of employees on applicable BMPs and general pollution prevention strategies and objectives.

General Pollution Prevention Protocols

Implement erosion and sediment control BMPs to stabilize soils and reduce pollutant discharges from contaminated or erodible surfaces.

Erosion and Sediment Controls

- Preserve natural vegetation whenever possible. See also EC-2 Preservation of Existing Vegetation, in the Construction BMP Handbook.
- Analyze soil conditions.
- Remove contaminated soil and dispose of properly.
- Stabilize loose soils by re-vegetating whenever possible. See also EC-4 Hydroseeding, in the Construction BMP Handbook.

Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment	✓
Nutrients	✓
Trash	✓
Metals	✓
Bacteria	✓
Oil and Grease	✓
Organics	✓

Minimum BMPs Covered

Good Housekeeping	✓
Preventative Maintenance	✓
Spill and Leak Prevention and	✓
Material Handling & Waste Management	✓
Erosion and Sediment Controls	✓
Employee Training Program	✓
Quality Assurance Record Keeping	✓



Contaminated or Erodible Areas SC-40

- Utilize non-vegetative stabilization methods for areas prone to erosion where vegetative options are not feasible. Examples include:
 - ✓ Areas of vehicular or pedestrian traffic such as roads or paths;
 - ✓ Arid environments where vegetation would not provide timely ground coverage, or would require excessive irrigation;
 - ✓ Rocky substrate, infertile or droughty soils where vegetation would be difficult to establish; and
 - ✓ Areas where vegetation will not grow adequately within the construction time frame.

There are several non-vegetative stabilization methods and selection should be based on site-specific conditions. See also EC-16 Non-Vegetative Stabilization, in the Construction BMP Handbook.

- Utilize chemical stabilization when needed. See also EC-5 Soil Binders, in the Construction BMP Handbook.
- Use geosynthetic membranes to control erosion if feasible. See also EC-7 Geotextiles and Mats, in the Construction BMP Handbook.
- Stabilize all roadways, entrances, and exits to sufficiently control discharges of erodible materials from discharging or being tracked off the site. See also TC 1-3 Tracking Control, in the Construction BMP Handbook.
- Implement wind erosion control measures as necessary. See also WE-1 Wind Erosion Control, in the Construction BMP Handbook.

Employee Training Program

- Educate employees about pollution prevention measures and goals.
- Train employees how to properly install and maintain the erosion and sediment source control BMPs described above. Detailed information is provided in the Construction BMP Handbook.
- Use a training log or similar method to document training.

Quality Assurance and Record Keeping

- Keep accurate logs that document actions taken to maintain and improve the effectiveness of the erosion and sediment control BMPs described above.
- Keep accurate logs of spill response actions that document what was spilled, how it was cleaned up, and how the waste was disposed.
- Establish procedures to complete logs and file them in the central office.

Contaminated or Erodible Areas SC-40

Potential Capital Facility Costs and Operation & Maintenance Requirements

Facilities

- Many facilities do not have contaminated or erodible areas and will require no additional capital expenditures.
- For sites with contaminated or erodible areas, purchase and installation of erosion and sediment controls will require additional capital investments, and this amount will vary depending on site characteristics and the types of BMPs being implemented.
- Minimize costs by maintaining existing vegetation and limiting site operations on bare soils.

Maintenance

- The erosion and sediment control BMPs described above require periodic inspection and maintenance to remain effective. The cost of these actions will vary depending on site characteristics and the types of BMPs being implemented.
- Irrigation costs may be required to establish and maintain vegetation.

Supplemental Information

Stabilization of Erodible Areas

Preserving stabilized areas minimizes erosion potential, protects water quality, and provides aesthetic benefits. The most effective way to control erosion is to preserve existing vegetation. Preservation of natural vegetation provides a natural buffer zone and an opportunity for infiltration of stormwater and capture of pollutants in the soil matrix. This practice can be used as a permanent source control measure.

Vegetation preservation should be incorporated into the site. Preservation requires good site management to minimize operations on bare soils where vegetation exists. Proper maintenance is important to ensure healthy vegetation that can control erosion. Different species, soil types, and climatic conditions will require different maintenance activities such as mulching, fertilizing, liming, irrigation, pruning and weed and pest control.

The preferred approach is to leave as much native vegetation on-site as possible, thereby reducing or eliminating any erosion problem. However, assuming the site already has contaminated or erodible surface areas, there are four possible courses of action which can be taken:

- The area can be revegetated if it is not in use and therefore not subject to damage from site activities. In as much as the area is already devoid of vegetation, special measures are likely necessary. Lack of vegetation may be due to the lack of water and/or poor soils. The latter can perhaps be solved with fertilization, or the ground may simply be too compacted from prior use. Improving soil conditions may be sufficient to support the recovery of vegetation. Use process wastewater for irrigation if possible, and see the Construction BMP Handbook for further procedures on establishing vegetation.

Contaminated or Erodible Areas SC-40

- Watering trucks to prevent dust.
- Chemical stabilization can be used as an alternate method in areas where temporary seeding practices cannot be used because of season or climate. It can provide immediate, effective, and inexpensive erosion control. Application rates and procedures recommended by the manufacturer should be followed as closely as possible to prevent the products from forming ponds and creating large areas where moisture cannot penetrate the soil. See also EC-5, Soil Binders, in the Construction BMP Handbook for more information. Advantages of chemical stabilization include:
 - ✓ Applied easily to the surface;
 - ✓ Stabilizes areas effectively; and
 - ✓ Provides immediate protection to soils that are in danger of erosion.
- Contaminated soils should be cleaned up or removed. This requires determination of the level and extent of the contamination. Removal must comply with State and Federal regulations; permits must be acquired and fees paid.
- Non-vegetated stabilization methods are suitable for permanently protecting from erosion by water and wind. Non-vegetated stabilization should only be utilized when vegetation cannot be established due to soil or climatic conditions, or where vegetation may be a potential fire hazard.

Examples of non-vegetative stabilization BMPs are provided below:

- ✓ **Decomposed Granite (DG) and Gravel Mulch** are suitable for use in areas where vegetation establishment is difficult, on flat surfaces, trails and pathways, and when used in conjunction with a stabilizer or tackifier, on shallow slopes (i.e., 10:1 [H:V]). DG and gravel can also be used on shallow rocky slopes where vegetation cannot be established for permanent erosion control.
- ✓ **Degradable Mulches** can be used to cover and protect soil surfaces from erosion both in temporary and permanent applications. In many cases, the use of mulches by themselves requires routine inspection and re-application. See EC-3 Hydraulic Mulch, EC-6 Straw Mulch, EC-8 Wood Mulch, or EC-14 Compost Blankets of the Construction BMP Handbook for more information.
- ✓ **Geotextiles and Mats** can be used as a temporary stand-alone soil stabilization method. Depending on material selection, geotextiles and mats can be a short-term (3 months - 1 year) or long-term (1-2 years) temporary stabilization method. For more information on geotextiles and mats see EC-7 Geotextiles and Mats of the Construction BMP Handbook.
- ✓ **Rock Slope Protection** can be used when the slopes are subject to scour or have a high erosion potential, such as slopes adjacent to flowing waterways or slopes subject to overflow from detention facilities (spillways).

Ventura Countywide Stormwater Quality Management Program. *Technical Guidance Manual for Stormwater Quality Control Measures*, 2010. Available online at: http://www.vstormwater.org/documents/workproducts/technicalguidancemanual/2010revisions/Ventura%20Technical%20Guidance%20Document_5-6-10.pdf.

Watershed Management Institute, Inc. *Operation, Maintenance, and Management of Stormwater Management Systems*, 1997. Available online at: <http://www.stormwater.ucf.edu/research/stormwaterOMM/stormwaterommi.pdf>.

General Description

Vegetated buffer strips (vegetated filter strips, biostrips, filter strips, and grassed filters) are vegetated surfaces that are designed to treat sheet flow from adjacent surfaces. They are an effective, easy to implement BMP that often go unrecognized at industrial and commercial facilities.

Vegetated buffer strips function by slowing runoff velocities and allowing sediment and other pollutants to settle and by providing some infiltration into underlying soils. They are well-suited to treating runoff from roads, roof downspouts, small parking lots, and pervious surfaces. They can be implemented to provide effective pretreatment for detention and infiltration stormwater BMPs.

Vegetated buffer strips can serve as part of a stormwater drainage system and can replace curbs, gutters and storm sewer systems. Therefore, they are best suited for small landscaped portions of industrial or commercial facilities with low peak flow rates. They are not well suited to treat stormwater runoff from industrial areas that have insufficient source control BMPs.

Inspection/Maintenance Considerations

Vegetated buffer strips require frequent landscape maintenance. In many cases, vegetated buffer strips initially require intense maintenance, but less maintenance is needed over time. Maintenance tasks may be conducted by a landscaping contractor. Maintenance requirements typically include grass or shrub-growing activities such as irrigation, mowing, trimming, removal of invasive species, and replanting when necessary. Buffer strips require more attention as the volume of sediment increases. Vegetated buffer strips can become a nuisance due to mosquito breeding in level spreaders (unless

Advanced BMPs Covered



Maintenance Concerns

- Vector Control
- Invasive Species Management
- Vegetation/Landscape Maintenance
- Erosion
- Channelization of Flow
- Aesthetics

Targeted Constituents

Sediment	■
Nutrients	■
Trash	▲
Metals	■
Bacteria	■
Oil and Grease	■
Organics	▲

Legend (Removal Effectiveness)

- Low ■ High ▲ Medium
- Requires Pretreatment

Note: This removal effectiveness ratings shown in the table are for properly designed, sized, and maintained BMPs. Storm configurations will have variations in pollutant effectiveness.



Vegetated Buffer Strip

TC-31

designed to dewater completely in 96 hours or less) and/or if proper drainage slopes are not maintained.

Drainage Activities	Suggested Frequency
□ Once the vegetated buffer strip is established, inspect at least three times per year. Repair all damage immediately. □ Inspect buffer strips after seeding and repair as needed. □ Inspect buffer strip and repair all damage immediately. □ Inspect soil and repair eroded areas.	Post construction
□ Inspect for erosion or damage to vegetation, preferably at the end of the wet season to schedule summer maintenance and before major fall runoff to be sure the strips are ready for winter. However, additional inspection after periods of heavy runoff is desirable. □ Inspect pea-gravel diaphragm/level spreader for clogging and effectiveness and remove built-up sediment. □ Inspect for rolls and gullies. Immediately fill with topsoil, install erosion control blanket and seed or sod. □ Inspect to ensure vegetation is well established. If not, either prepare soil and reseed or replace with alternative species. Install erosion control blanket. □ Check for debris and litter, and areas of sediment accumulation.	After major storms
□ Water plants daily for 2 weeks after construction. □ Mow regularly to maintain vegetation height between 2 - 4 inches, and to promote thick, dense vegetative growth. Cut only when soil is dry to prevent tracking damage to vegetation, soil compaction and flow concentrations. Clippings are to be removed immediately after mowing. □ Remove all litter, branches, rocks, or other debris. Damaged areas of the filter strip should be repaired immediately by reseeding and applying mulch. □ Regularly maintain inlet flow spreader. □ Irrigate during dry season (April through October) when necessary to maintain the vegetation.	Semi-annual
□ Remove mulch void areas. □ Treat diseased trees and shrubs, remove dead vegetation. □ Remove sediment and replant in areas of buildup. Sediment accumulating near culverts and in channels should be removed when it builds up to 3 in. at any spot, or covers vegetation. □ Limit fertilizer applications based on plant vigor and soil test results. □ Rework or replant buffer strip if concentrated flow erodes a channel through the strip.	Annual

Vegetated Buffer Strip

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Additional Information

Research (Colwell et al., 2000) indicates that grass height and mowing frequency have little impact on pollutant removal. Consequently, mowing may only be necessary once or twice a year for safety or aesthetics or to suppress weeds and woody vegetation.

Trash tends to accumulate in swale areas, particularly along highways. The need for litter removal is determined through periodic inspection, but litter should always be removed prior to mowing.

The buffer strip should be covered with dense vegetative cover to filter pollutants out of runoff and helps reduce flow velocities and protect the strip from erosion. Fine, close-growing grasses are ideal because increasing the surface area of the vegetation exposed to runoff improves the effectiveness of the swale. Drought tolerant vegetation that can tolerate sediment and debris accumulations is best-suited for vegetated buffer strips.

References

California Department of Transportation. *Treatment BMP Technology Report (CTSW-RT-09-239.06)*. April, 2010. Available online at: <http://www.dot.ca.gov/hq/snv/stormwater/pdf/CTSW-RT-09-239-06.pdf>.

California Stormwater Quality Association. *Stormwater Best Management Practice Handbook, New Development and Redevelopment*, 2003. Available online at: <https://www.casqa.org/resources/bmp-handbooks/new-development-redevelopment-bmp-handbook>.

California Stormwater Quality Association. *Stormwater Best Management Practice Handbook, New Development and Redevelopment*, 2003. Available online at: <https://www.casqa.org/resources/bmp-handbooks/new-development-redevelopment-bmp-handbook>.

Colwell, Shanti R., Horner, Richard R., and Booth, Derek B. *Characterization of Performance Predictors and Evaluation of Mowing Practices in Biofiltration Swales*. Report to King County Land and Water Resources Division and others by Center for Urban Water Resources Management, Department of Civil and Environmental Engineering, University of Washington, Seattle, 2000.

San Francisco Public Utilities Commission, et al. *San Francisco Stormwater Design Guidelines, Appendix A, Stormwater BMP Fact Sheets*, 2010. Available online at: <http://www.sfwater.org/modules/showdocument.aspx?documentid=2778>.

Stormwater Managers Resource Center. <http://www.stormwatercenter.net>.

Tahoe Regional Planning Agency. *Best Management Practices Handbook*, 2012. Available online at: <http://www.tahoebmp.org/Documents/2012%20BMP%20Handbook.pdf>.

U.S. Environmental Protection Agency, Post-Construction Stormwater Management in New Development and Redevelopment. BMP Fact Sheets. Available online at: http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=min_measure&min_measure_id=5.

Ventura Countywide Stormwater Quality Management Program. *Technical Guidance Manual for Stormwater Quality Control Measures*, 2010. Available online at: http://www.vstormwater.org/documents/workproducts/technicalguidancemanual/2010revisions/Ventura%20Technical%20Guidance%20Document_5-5-10.pdf.

Watershed Management Institute, Inc. *Operation, Maintenance, and Management of Stormwater Management Systems*. August, 1997. Available online at: <http://www.stormwater.ucf.edu/research/stormwaterOMM/stormwateromm.pdf>.

General Description

The bioretention best management practice (BMP) functions as a soil and plant-based filtration device that removes pollutants through a variety of physical, biological, and chemical treatment processes. These facilities normally consist of a grass buffer strip, sand bed, ponding area, organic layer or mulch layer, planting soil, and plants. The runoff's velocity is reduced by passing over or through a sand bed and is subsequently distributed evenly along a ponding area. Exfiltration of the stored water in the bioretention area planting soil into the underlying soils occurs over a period of days.

Inspection/Maintenance Considerations

Bioretention requires monthly landscaping maintenance, including measures to ensure that the area is functioning properly and irrigation during dry periods. In many cases, bioretention areas initially require intense maintenance, but less maintenance is needed over time. Maintenance tasks may be conducted by a landscaping contractor, who may already be hired at the site.

Sediment may enter the bioretention cell and form a crust on the soil surface, limiting the porosity of the soil. Raking of the mulch and soil surface may be needed to maintain high infiltration rates. In cold climates the soil may freeze, preventing runoff from infiltrating into the planting soil.

Bioretention systems can become a nuisance due to mosquito and midge breeding. Maintaining soil porosity and basic housekeeping practices such as removal of debris accumulations and vegetation management are necessary to ensure that the system dewateres completely (recommended 72 hour residence time or less) to prevent creating mosquito and other vector habitats.

Advanced BMPs Covered



Maintenance Concerns

- Clogged Soil or Outlet Structures
- Sediment Accumulation
- Invasive Species Management
- Vegetation/Landscape Maintenance
- Erosion
- Channelization of Flow
- Vector Control
- Aesthetics

Targeted Constituents

Sediment	■
Nutrients	▲
Trash	■
Metals	■
Bacteria	■
Oil and Grease	■
Organics	■

Legend (Removal Effectiveness)

- Low ■ High ▲ Medium
- * Requires Pretreatment

Note: The removal effectiveness ratings shown in the table are for properly designed, sited, and maintained BMPs; some configurations will have variations in pollutant effectiveness.



Bioretention

TC-32

Inspection Activities	Suggested Frequency
☐ Inspect soil and repair eroded areas.	Monthly
☐ Inspect for erosion or damage to vegetation, preferably at the end of the wet season to schedule summer maintenance and before major fall runoff to be sure the strips are ready for winter. However, additional inspection after periods of heavy runoff is desirable.	Semi-annual inspection
☐ Inspect to ensure vegetation is well established. If not, either prepare soil and reseed or replace with alternative species. Install erosion control blanket.	
☐ Check for debris and litter, and areas of sediment accumulation. ☐ Inspect health of trees and shrubs.	
Maintenance Activities	Suggested Frequency
☐ Water plants daily for 2 weeks.	At project completion
☐ Remove litter and debris.	As needed
☐ Remove sediment.	
☐ Remulch void areas.	
☐ Irrigate during dry periods.	
☐ Treat diseased trees and shrubs.	
☐ Move turf areas.	
☐ Repair erosion at inflow points.	
☐ Repair outflow structures.	
☐ Unclog underdrain.	
☐ Regulate soil pH.	
☐ Make structural changes or repairs as needed to eliminate pools of water that stand longer than 96 hrs to prevent mosquito production, particularly during the warmer months of the year. Identify and eliminate sources of non-stormwater runoff that feed standing water pools. Coordinate with the local mosquito and vector control agency to control mosquitoes, if necessary.	
☐ Remove and replace dead and diseased vegetation.	Semi-annual
☐ Add mulch.	Annual
☐ Replace tree stakes and wires.	Every 2-3 years, or as needed
☐ Mulch should be replaced every 2 to 3 years or when bare spots appear or infiltration rates are reduced. Remulch prior to the wet season.	

Additional Information

Landscaping is critical to the function and aesthetic value of bioretention areas. It is preferable to plant the area with native vegetation, or plants that provide habitat value, where possible. Another important design feature is to select species that can withstand the hydrologic regime they will experience. At the bottom of the bioretention facility, plants that tolerate both wet and dry conditions are preferable. At the edges, which will remain primarily dry, upland species will be the most resilient. It is best to select a combination of trees, shrubs, and herbaceous materials.

Bioretention

TC-32

For areas with low permeability native soils or steep slopes, bioretention areas can be designed with an underdrain system that routes the treated runoff to the storm drain system rather than depending entirely on infiltration.

Special considerations are required for bioretention to be effective in cold climates – see the Stormwater Managers Resource Center for more information.

References

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20.0 APPENDIX: PEST MANAGEMENT GUIDELINES



LEGAL PEST MANAGEMENT PRACTICES FOR MARIJUANA GROWERS IN CALIFORNIA

Department of Pesticide
Regulation

PESTS OF MARIJUANA IN CALIFORNIA

Marijuana pests vary according to cultivar (variety), whether the plants are grown indoors or outdoors, and where the plants are grown geographically. The pests included in this review are preliminary and based on the following sources: a presentation given in 2013 by Whitney Cranshaw, an extension entomologist at Colorado State University, and a review article by John M. McPartland, a professor of family medicine at the University of Vermont. We also received input from Kevin Hoffman, Primary State Entomologist, California Department of Food & Agriculture (CDFA).

HOW TO INTERPRET THE TABLES

Table 1 lists active ingredients not illegal to use on marijuana and the pests that these active ingredients target.

These active ingredients are exempt from **residue tolerance requirements**¹ and either exempt from **registration requirements**² or registered for a use that's broad enough to include use on marijuana. Residue tolerance requirements are set by U.S. EPA for each pesticide on each food crop and is the amount of pesticide residue allowed to remain in or on each treated crop with "reasonable certainty of no harm." Some pesticides are exempted from the tolerance requirement when they're found to be safe. Some of these pesticides are bacterial-based insect pathogens (e.g., *Bacillus thuringiensis*) or biofungicides (e.g., *Bacillus subtilis*, *Glilotadium virens*).

Active ingredients exempt from registration requirements are mostly food-grade essential oils such as peppermint oil or rosemary oil.

Tables 2 and 3 list pests of marijuana grown outdoors and indoors, and **Table 3** shows pests arranged by the portion of the plant they attack. An explanation of the column labels for Tables 2 and 3 follow.

PESTS. The tables show the most likely pests in California based on Cranshaw's presentation and McPartland's list and gleaned from California-based web sites and blogs. Some pests that drew attention on several blogs (e.g., russet mites) may be worse during drought years. Many have cyclic population

fluctuations and others are mainstays of general greenhouse cultivation (e.g., whiteflies, thrips, and fungus gnats). We'll add weeds to this compendium when we have more information.

DAMAGE. For damage caused by greenhouse pests, we derived information from Cranshaw's presentation; for that of outdoor pests when there wasn't any overlap, McPartland's list was used and information from UC IPM for various crops. Accounts of damage by rodents is anecdotal.

PESTS NOT OFFICIALLY IDENTIFIED IN CALIFORNIA. Kevin Hoffman of CDFA notes that several marijuana pests in other states are not yet known in California. These pests would add to the russet mites, aphids, cutworms, budworms, borers, and flea beetles already in California. As more and more marijuana is planted throughout the state, collecting potential pests will enable entomologists to identify new species.

THE IMPORTANCE OF CORRECT IDENTIFICATION. It's essential to identify the potential pest, or you may launch a futile program for a mite or insect that isn't a pest. And likewise, you need to know the correct species or you may use the wrong management strategy. For accurate identification, take specimens to an entomologist.

HOW TO PRESERVE SPECIMENS FOR IDENTIFICATION. If the mite or insect specimen is hard bodied (e.g., beetles, moths) carefully place it in a small pill vial and cushion with crumpled tissue paper. If your specimen isn't yet dead, put it in a jar and place in a freezer overnight. Do not wrap specimens in tissue and seal them in plastic bags or you'll end up with smashed bug parts.

Place soft-bodied specimens (e.g., mites, leafhoppers, aphids, caterpillars) in a jar filled with rubbing alcohol. Include written information such as where on the plant you found the specimen, the general location of the plant, and date captured. Note original color and texture, since these will change once you immerse the specimen in alcohol. Also helpful are photographs of the specimen in its original habitat.

IPM PRACTICES. Most of these are standard practices for pests on hosts other than marijuana. For more detailed explanations, see information compiled by the

¹ 40 CFR (Code of Federal Regulations)

² under FIFRA section 25(b) and 3 CCR section 6147

University of California Statewide IPM Program (UC IPM) at www.ipm.ucdavis.edu. You can enter a pest name in the search box (e.g., cutworm) and read about IPM practices for the pest on crops other than marijuana. For marijuana grown indoors, go to the UC IPM [home page](#), click on [Agricultural Pests](#) and scroll down the alphabetical list until you reach [ornamental nurseries](#).

Some practices were excluded because they apply to nearly all of the pests. For example, when targeting aphids, whiteflies, and thrips, growers can attract predaceous and parasitic arthropods by planting strips or borders of cover crops (e.g., California buckwheat) and insectary plants—especially those in the carrot, mustard, and sunflower families (Pickett & Bugg, 1998).

LEGAL PESTICIDES. These are covered above in the Table 1 description and are exempt from **residue tolerance requirements** and either exempt from

registration requirements or registered for a use that is broad enough to include use on marijuana.

Table 4 shows representative marijuana pests by plant part. Not all of these pests are important, but their collective damage may affect the overall health of the plant.

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Table 1. Active ingredients that are exempt from residue tolerance requirements^a and either exempt from registration requirements^b or registered for a use broad enough to include use on marijuana.

ACTIVE INGREDIENT	PEST OR DISEASE
azadirachtin ^a	aphids, whiteflies, fungus gnats, leafminers, cutworms
<i>Bacillus subtilis</i> QST ^{a1}	root diseases, powdery mildew
<i>Bacillus thuringiensis</i> ^{a2} subsp. <i>aizawai</i> or <i>kurstaki</i>	moth larvae (e.g., cutworms, budworms, borer)
<i>Bacillus thuringiensis</i> ^{a2} subsp. <i>israelensis</i>	fly larvae (e.g., fungus gnats)
<i>Beauveria bassiana</i> ^{a3}	whiteflies, aphids, thrips
cinnamon oil ^b	whiteflies
<i>Gliocladium virens</i> ^{a1}	root diseases
horticultural oils ^a (petroleum oil)	mites, aphids, whiteflies, thrips; powdery mildew
insecticidal soaps ^a (potassium salts of fatty acids)	aphids, whiteflies, cutworms, budworms
iron phosphate ^a , sodium ferric EDTA ^a	slugs and snails
neem oil ^a	mites; powdery mildew
potassium bicarbonate ^a ; sodium bicarbonate ^a	powdery mildew
predatory nematodes ^a	fungus gnats
rosemary + peppermint essential oils ^b	whiteflies
sulfur ^a	mites, flea beetles
<i>Trichoderma harzianum</i> ^{a1}	root diseases

^a 40 CFR (Code of Federal Regulations)

^b FIFRA §25(b) and 3 CCR §6147 [FIFRA = the Federal Insecticide, Fungicide, and Rodenticide Act; CCR = California Code of Regulations]

¹ Biofungicides

² Bacterial-based insect pathogen

³ Fungal-based insect pathogen

Table 2. PEST MANAGEMENT PRACTICES FOR MARIJUANA GROWN OUTDOORS

PEST		DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
MITES & INSECTS				
two-spotted spider mites <i>Tetranychus urticae</i> (and other Tetranychidae)		Suck plant sap; stipple leaves	- Keep dust down by hosing off plants (if dust is a problem) - Release predatory mites	neem oil, horticultural oil
russet mites <i>Aculops</i> spp.		Suck plant sap; kill leaves and flowers	Release predatory mites	neem oil, horticultural oil, sulfur
crickets (field & house)		Eat seedlings	Use floating row covers or cones on individual plants	—
termites		Eat roots	Flood nests	—
leafhoppers		Suck plant sap; weaken plants	Encourage natural enemies by planting nectar sources	horticultural oil or insecticidal soaps for nymphs
aphids <i>Myzus persicae</i> , <i>Aphis fabae</i>		Suck plant sap; weaken plants	- Hang up yellow sticky cards (alates) - Hose off plants	azadirachtin, horticultural oil, insecticidal soaps, <i>Beauveria bassiana</i>
whiteflies <i>Trialeurodes vaporariorum</i> , <i>Bemisia tabaci</i> , <i>B. argentifolii</i>		Suck plant sap; weaken plants	- Hang up yellow sticky cards - Use reflective plastic mulch	azadirachtin, horticultural oil, insecticidal soaps, rosemary + peppermint oils, <i>Beauveria bassiana</i>
leafminers <i>Liriomyza</i> spp.		Bore into roots and leaves	- Remove older infested leaves - Use biocontrol: release <i>Diglyphus</i> parasitoids	azadirachtin
LEPIDOPTERA	cutworms <i>Agrotis ipsilon</i> , <i>Spodoptera exigua</i> (Noctuidae)	Eat seedlings	- Use pheromone traps to detect adults. - Remove weeds, which serve as a reservoir for cutworms and other noctuids	Vegetative stage only: Use <i>Bacillus thuringiensis kurstaki</i> if egg-laying adults found, insecticidal soap; azadirachtin
	budworms <i>Helicoverpa zea</i> (Noctuidae)	Eat flowering buds	- Shake plants to dislodge larvae - Remove infested buds - Plant corn as trap crop	Vegetative stage only: Use <i>Bacillus thuringiensis kurstaki</i> , insecticidal soap

PEST		DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
COLEOPTERA	flea beetles (Chrysomelidae)	Bore into stems (grubs); feed on seedlings and leaves of larger plants (adults)	- Use reflective mulches - Plant trap crops (e.g., radish or Chinese mustard)	sulfur
	scarab grubs (possibly other beetles)	Bore into stems	Use parasitic nematodes	—
MAMMALS				
mice (e.g., house mice)		Eat young sprouts and seeds	- Double wrap a 3'-tall chicken wire fence around plants - Trap (minus rodenticides) - Mount barn owl boxes	rodenticides*
roof rats , <i>Rattus rattus</i> wood rats , <i>Neotoma</i> spp.		Strip bark from stems to build nests		
pocket gophers , <i>Thomomys</i> spp.		Tunnel through planting areas; feed on plants; gnaw on irrigation lines		
Columbian black-tailed deer , <i>Odocoileus hemionus columbianus</i>		Knock over plants; leave dander, droppings, and ticks behind	Install deer fencing	—
black bears , <i>Ursus americana</i>		Knock over plants	Install electric fencing	—

* If using a rodenticide, use products that are not DPR-restricted materials or federally restricted-use pesticides *and* are registered for a broad enough use to include use in or around marijuana cultivation sites. If using a rodenticide always read and follow the label and check to make sure that the target rodent is listed. Second-generation anticoagulant products (contain the active ingredients brodifacoum, bromadiolone, difenacoum, and difethialone) are DPR-restricted materials not labeled for field use and should never be used in or around marijuana cultivation sites.

Table 3. PEST MANAGEMENT PRACTICES FOR MARIJUANA GROWN INDOORS
(e.g., greenhouses, sheds, and grow rooms)

PEST	DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
DISEASES			
powdery mildew <i>Sphaerotheca macularis</i>	Grow on leaves as white and gray powdery patches	Use fans to improve air circulation	horticultural oil; neem oil; sodium bicarbonate, potassium bicarbonate; <i>Bacillus subtilis</i>
pythium root rots <i>Pythium</i> spp.	Attack root tips and worsens when plants grow in wet soil	Avoid hydroponic production or wet soil conditions	Incorporate biocontrol agents into root-growing media (e.g., <i>Gliocladium virens</i> , <i>Trichoderma harzianum</i> , <i>Bacillus subtilis</i>)
MITES & INSECTS			
two-spotted spider mite <i>Tetranychus urticae</i> (and other Tetranychidae)	Suck plant sap; stipple leaves	- Disinfest cuttings before introducing to growing area - Release predatory mites	neem oil, horticultural oil, sulfur
leafhoppers	Suck plant sap; weaken plants	Encourage natural enemies by planting nectar sources	horticultural oil or insecticidal soaps for nymphs
whiteflies <i>Trialeurodes vaporariorum</i> , <i>Bemisia tabaci</i> , <i>B. argentifolii</i>	Suck plant sap; weaken plants	- Hang up yellow sticky cards - Use biocontrol: <i>Encarsia formosa</i>	azadirachtin, <i>Beauveria bassiana</i> , cinnamon oil, horticultural oil
thrips <i>Heliothrips haemorrhoidalis</i> , <i>Frankliniella occidentalis</i> , <i>Thrips tabaci</i>	Stipple leaves and vector viruses	Hang up yellow or blue sticky cards	
dark-winged fungus gnats (Diptera: Sciaridae) <i>Bradysia</i> spp.	Damage roots and stunt plant growth	- Avoid overwatering - Use growing media that deters gnat development - Hang up yellow sticky cards - Use biocontrol: soil-dwelling predatory mites	<i>Bacillus thuringiensis israelensis</i> (BTI); predatory nematodes; azadirachtin soil drenches

Table 4. PESTS OF MARIJUANA BY PLANT PART

Seedlings	Flower & Leaf (grown outdoors)	Flower & Leaf (grown indoors)	Stalk & Stem	Root
crickets	flea beetles	spider mites	rats	flea beetles
cutworms	leafminers	leafhoppers		white root grubs
flea beetles	budworms	aphids		root maggots
slugs		whiteflies		termites & ants
rodents		thrips		fungus gnats
birds				wireworms

CANNABIS

PESTICIDES THAT ARE **LEGAL** TO USE



Protecting workers, the public, and the environment from adverse effects of pesticide use in cannabis cultivation is critical to the mission of the California Department of Pesticide Regulation (DPR). DPR and the County Agricultural Commissioners (CAC) enforce the use and sale of pesticides under Divisions 6 and 7 of the California Food and Agricultural Code (FAC), and Title 3 of the California Code of Regulations (CCR). These laws and regulations apply to all pesticide use; cannabis is no exception.

All pesticide product labels include a warning statement, precautionary statements for protecting human and environmental health, storage and disposal statements, and directions for use. By law, all pesticide users must follow these statements.

When using pesticide products in cannabis cultivation, applicators must not use a rate that is higher than the rates listed on the label and follow the agricultural use requirements including method of application, restricted entry interval, personal protective equipment, and pre-harvest interval.

Some pesticide products are never allowed in cannabis cultivation under any circumstances (see DPR's document: [Pesticides that Cannot be Used on Cannabis](#)).

Always read the label prior to using any pesticide.

PRODUCTS THAT CAN BE LEGALLY APPLIED TO CANNABIS IN CALIFORNIA

A pesticide product can legally be applied to cannabis under state law if the active ingredients found in the product are exempt from residue tolerance requirements and the product is either exempt from registration requirements or registered for a use that is broad enough to include use on cannabis.

Residue tolerance requirements are set by U.S. EPA for each pesticide on each food crop and are the amount of pesticide residue allowed to remain in or on each treated crop with "reasonable certainty of no harm." Some pesticides are exempt from the tolerance requirement when they are found to be minimal risk.

Active ingredients exempt from registration requirements are mostly food-grade essential oils such as peppermint oil or rosemary oil.

Cannabis cultivators who are licensed by the California Department of Food and Agriculture are required to comply with pesticide laws and regulations as enforced by DPR and the CAC's.

For more information:
www.cdpr.ca.gov/cannabis

PESTICIDES THAT ARE **LEGAL** TO USE ON CANNABIS

The following are examples of pesticide active ingredients that are exempt from tolerance requirements and either exempt from registration requirements or have labels broad enough to include use on cannabis. This is not an exhaustive list of active ingredients that may fit the legal use criteria. The active ingredients are organized by the intended target.

Insecticides and Miticides

- Azadirachtin
- *Bacillus thuringiensis* sub. *kurstaki*
- *Bacillus thuringiensis* sub. *israelensis*
- *Beauveria bassiana*
- *Burkholderia* spp. strain A396
- Capsaicin
- Cinnamon and cinnamon oil
- Citric acid
- Garlic and garlic oil
- Geraniol
- Horticultural oils (petroleum oil)
- Insecticidal soaps (potassium salts of fatty acids)
- Iron phosphate
- *Isaria fumosorosea*
- Neem oil
- Potassium bicarbonate
- Potassium sorbate
- Rosemary oil
- Sesame and sesame oil
- Sodium bicarbonate
- Soybean oil
- Sulfur
- Thyme oil

Fungicides and Antimicrobials

- *Bacillus amyloliquefaciens* strain D747
- Cloves and clove oil
- Corn oil
- Cottonseed oil
- *Gliocladium virens*
- Neem oil
- Peppermint and peppermint oil
- Potassium bicarbonate
- Potassium silicate
- Rosemary and rosemary oil
- Sodium bicarbonate
- *Reynoutria sachalinensis* extract
- *Trichoderma harzianum*

Vertebrate Repellants

- Castor oil
- Geraniol

CANNABIS

PESTICIDES THAT CANNOT BE USED



Protecting workers, the public, and the environment from adverse effects of pesticide use in cannabis cultivation is critical to the mission of the California Department of Pesticide Regulation (DPR). DPR and the County Agricultural Commissioners (CAC) enforce the use and sale of pesticides under Divisions 6 and 7 of the California Food and Agricultural Code (FAC), and Title 3 of the California Code of Regulations (CCR). These laws and regulations apply to all pesticide use; cannabis is no exception.

All pesticide product labels include a warning statement, precautionary statements for protecting human and environmental health, storage and disposal statements, and directions for use. By law, all pesticide users must follow these statements.

When using pesticide products in cannabis cultivation, applicators must not use a rate that is higher than the rates listed on the label and follow the agricultural use requirements including method of application, restricted entry interval, personal protective equipment, and pre-harvest interval.

Always read the label prior to using any pesticide.

Some pesticides cannot be used in cannabis cultivation.

While there are some pesticide products that are legal to use on cannabis under state law, (see DPR's document: [Pesticides that are Legal to Use on Cannabis](#)) other products are never allowed in cannabis cultivation. The following criteria identify pesticide products that cannot be used in California cannabis cultivation under any circumstances. The use of any pesticides meeting any one of these criteria on cannabis will be strictly enforced as a violation of the FAC and could result in civil or criminal penalties (FAC sections 12996 and 12999.5):

- Not registered for a food use in California
- California Restricted Material including Federal Restricted Use Pesticides (3CCR section 6400)
On the groundwater protection list (3CCR section 6800)

Cannabis cultivators who are licensed by the California Department of Food and Agriculture are required to comply with pesticide laws and regulations as enforced by DPR and the CAC's.

For more information:
www.cdpr.ca.gov/cannabis

PESTICIDES THAT **CANNOT** BE USED ON CANNABIS

The following are criteria for identifying pesticides that cannot be used in cannabis cultivation and examples of active ingredients meeting these criteria. This is a representative list of active ingredients and not intended to be exhaustive. The fact that an active ingredient is not listed does not authorize its use on cannabis in California.

Pesticides Not Registered for Food Use in California

If a pesticide product does not have directions for use on a food crop, it cannot be used in cannabis cultivation. Examples of active ingredients that do not have food uses include:

- Aldicarb
- Carbofuran
- Chlordane
- Chlorfenapyr
- Coumaphos
- Daminozide
- DDVP (Dichlorvos)
- Etofenprox
- Fenoxycarb
- Imazalil
- Methyl parathion
- Mevinphos
- Paclobutrazol
- Propoxur
- Spiroxamine
- Thiacloprid

California Restricted Materials

DPR designates certain pesticides as California restricted materials (3 CCR section 6400). A pesticide can be considered a restricted material for many reasons including designation as a federal Restricted Use Pesticide. Many of these products have product labels that clearly state "Restricted Use Pesticide." Consult your local CAC to determine whether a product is a restricted material. Examples of California restricted materials include:

- Abamectin
- Bifenthrin
- Brodifacoum
- Bromodiolone
- Cyfluthrin
- Difenacoum
- Difethialone
- Fipronil
- Naled

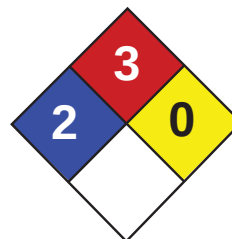
Pesticides on the Groundwater Protection List

Active ingredients that are on the Groundwater Protection List (3CCR section 6800) have chemical characteristics that make them likely to move into groundwater. Examples of active ingredients on the groundwater protection list include:

- Acephate
- Azoxystrobin
- Boscalid
- Carbaryl
- Chlorantraniliprole
- Diazinon
- Dimethoate
- Dimethomorph
- Ethoprop(hos)
- Fludioxonil
- Imidacloprid
- Malathion
- Metalaxyl
- Methiocarb
- Methomyl
- Myclobutanil
- Propiconazole
- Tebuconazole
- Thiamethoxam

21.0 APPENDIX: MATERIAL DATA SAFETY SHEETS

Insert here or bind separately



Health	2
Fire	3
Reactivity	0
Personal Protection	E

Material Safety Data Sheet

Ethyl alcohol 200 Proof MSDS

Section 1: Chemical Product and Company Identification

Product Name: Ethyl alcohol 200 Proof

Catalog Codes: SLE2248, SLE1357

CAS#: 64-17-5

RTECS: KQ6300000

TSCA: TSCA 8(b) inventory: Ethyl alcohol 200 Proof

CI#: Not applicable.

Synonym: Ethanol; Absolute Ethanol; Alcohol; Ethanol 200 proof; Ethyl Alcohol, Anhydrous; Ethanol, undenatured; Dehydrated Alcohol; Alcohol

Chemical Name: Ethyl Alcohol

Chemical Formula: CH₃CH₂OH

Contact Information:

Sciencelab.com, Inc.

14025 Smith Rd.

Houston, Texas 77396

US Sales: **1-800-901-7247**

International Sales: **1-281-441-4400**

Order Online: ScienceLab.com

CHEMTREC (24HR Emergency Telephone), call:

1-800-424-9300

International CHEMTREC, call: 1-703-527-3887

For non-emergency assistance, call: 1-281-441-4400

Section 2: Composition and Information on Ingredients

Composition:

Name	CAS #	% by Weight
Ethyl alcohol 200 Proof	64-17-5	100

Toxicological Data on Ingredients: Ethyl alcohol 200 Proof: ORAL (LD50): Acute: 7060 mg/kg [Rat]. 3450 mg/kg [Mouse]. VAPOR (LC50): Acute: 20000 ppm 8 hours [Rat]. 39000 mg/m 4 hours [Mouse].

Section 3: Hazards Identification

Potential Acute Health Effects:

Hazardous in case of skin contact (irritant), of eye contact (irritant), of inhalation. Slightly hazardous in case of skin contact (permeator), of ingestion.

Potential Chronic Health Effects:

Slightly hazardous in case of skin contact (sensitizer). CARCINOGENIC EFFECTS: A4 (Not classifiable for human or animal.) by ACGIH. MUTAGENIC EFFECTS: Mutagenic for mammalian somatic cells. Mutagenic for bacteria and/or yeast. TERATOGENIC EFFECTS: Classified PROVEN for human. DEVELOPMENTAL TOXICITY: Classified Development toxin [PROVEN]. Classified Reproductive system/toxin/female, Reproductive system/toxin/male [POSSIBLE]. The substance is toxic to blood, the reproductive system, liver, upper respiratory tract, skin, central nervous system (CNS). Repeated or prolonged exposure to the substance can produce target organs damage.

Section 4: First Aid Measures

Eye Contact:

Check for and remove any contact lenses. Immediately flush eyes with running water for at least 15 minutes, keeping eyelids open. Cold water may be used. Get medical attention.

Skin Contact:

In case of contact, immediately flush skin with plenty of water. Cover the irritated skin with an emollient. Remove contaminated clothing and shoes. Cold water may be used. Wash clothing before reuse. Thoroughly clean shoes before reuse. Get medical attention.

Serious Skin Contact:

Wash with a disinfectant soap and cover the contaminated skin with an anti-bacterial cream. Seek medical attention.

Inhalation:

If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention if symptoms appear.

Serious Inhalation:

Evacuate the victim to a safe area as soon as possible. Loosen tight clothing such as a collar, tie, belt or waistband. If breathing is difficult, administer oxygen. If the victim is not breathing, perform mouth-to-mouth resuscitation. Seek medical attention.

Ingestion:

Do NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Loosen tight clothing such as a collar, tie, belt or waistband. Get medical attention if symptoms appear.

Serious Ingestion: Not available.

Section 5: Fire and Explosion Data

Flammability of the Product: Flammable.

Auto-Ignition Temperature: 363°C (685.4°F)

Flash Points: CLOSED CUP: 12.78°C (55°F). OPEN CUP: 17.78°C (64°F) (Cleveland).

Flammable Limits: LOWER: 3.3% UPPER: 19%

Products of Combustion: These products are carbon oxides (CO, CO₂).

Fire Hazards in Presence of Various Substances:

Highly flammable in presence of open flames and sparks, of heat. Slightly flammable to flammable in presence of oxidizing materials.

Explosion Hazards in Presence of Various Substances:

Risks of explosion of the product in presence of mechanical impact: Not available. Slightly explosive in presence of open flames and sparks, of heat, of oxidizing materials, of acids.

Fire Fighting Media and Instructions:

Flammable liquid, soluble or dispersed in water. SMALL FIRE: Use DRY chemical powder. LARGE FIRE: Use alcohol foam, water spray or fog.

Special Remarks on Fire Hazards:

Containers should be grounded. CAUTION: MAY BURN WITH NEAR INVISIBLE FLAME Vapor may travel considerable distance to source of ignition and flash back. May form explosive mixtures with air. Contact with Bromine pentafluoride is likely to cause fire or explosion. Ethanol ignites on contact with chromyl chloride. Ethanol ignites on contact with iodine heptafluoride gas. It ignites than explodes upon contact with nitrosyl perchlorate. Addition of platinum black catalyst caused ignition.

Special Remarks on Explosion Hazards:

Ethanol has an explosive reaction with the oxidized coating around potassium metal. Ethanol ignites and then explodes on contact with acetic anhydride + sodium hydrosulfate (ignites and may explode), disulfuric acid + nitric acid, phosphorous(III) oxide platinum, potassium-tert-butoxide+ acids. Ethanol forms explosive products in reaction with the following compound :

ammonia + silver nitrate (forms silver nitride and silver fulminate), iodine + phosphorus (forms ethane iodide), magnesium perchlorate (forms ethyl perchlorate), mercuric nitrate, nitric acid + silver (forms silver fulminate) silver nitrate (forms ethyl nitrate) silver(I) oxide + ammonia or hydrazine (forms silver nitride and silver fulminate), sodium (evolves hydrogen gas). Sodium Hydrazide + alcohol can produce an explosion. Alcohols should not be mixed with mercuric nitrate, as explosive mercuric fulminate may be formed. May form explosive mixture with manganese perchlorate + 2,2-dimethoxypropane. Addition of alcohols to highly concentrate hydrogen peroxide forms powerful explosives. Explodes on contact with calcium hypochlorite

Section 6: Accidental Release Measures

Small Spill:

Dilute with water and mop up, or absorb with an inert dry material and place in an appropriate waste disposal container.

Large Spill:

Flammable liquid. Keep away from heat. Keep away from sources of ignition. Stop leak if without risk. Absorb with DRY earth, sand or other non-combustible material. Do not touch spilled material. Prevent entry into sewers, basements or confined areas; dike if needed. Be careful that the product is not present at a concentration level above TLV. Check TLV on the MSDS and with local authorities.

Section 7: Handling and Storage

Precautions:

Keep locked up.. Keep away from heat. Keep away from sources of ignition. Ground all equipment containing material. Do not ingest. Do not breathe gas/fumes/ vapor/spray. Wear suitable protective clothing. In case of insufficient ventilation, wear suitable respiratory equipment. If ingested, seek medical advice immediately and show the container or the label. Avoid contact with skin and eyes. Keep away from incompatibles such as oxidizing agents, acids, alkalis, moisture.

Storage:

Store in a segregated and approved area. Keep container in a cool, well-ventilated area. Keep container tightly closed and sealed until ready for use. Avoid all possible sources of ignition (spark or flame). Do not store above 23°C (73.4°F).

Section 8: Exposure Controls/Personal Protection

Engineering Controls:

Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value. Ensure that eyewash stations and safety showers are proximal to the work-station location.

Personal Protection:

Splash goggles. Lab coat. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Gloves. Use a respirator if the exposure limit is exceeded.

Personal Protection in Case of a Large Spill:

Splash goggles. Full suit. Vapor respirator. Boots. Gloves. A self contained breathing apparatus should be used to avoid inhalation of the product. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.

Exposure Limits:

TWA: 1900 (mg/m³) from OSHA (PEL) [United States] TWA: 1000 (ppm) from OSHA (PEL) [United States] TWA: 1900 (mg/m³) from NIOSH [United States] TWA: 1000 (ppm) from NIOSH [United States] TWA: 1000 (ppm) [United Kingdom (UK)] TWA: 1920 (mg/m³) [United Kingdom (UK)] TWA: 1000 STEL: 1250 (ppm) [Canada] Consult local authorities for acceptable exposure limits.

Section 9: Physical and Chemical Properties

Physical state and appearance: Liquid. (Liquid.)

Odor:

Mild to strong, rather pleasant; like wine or whiskey. Alcohol-like; Ethereal, vinous.

Taste: Pungent. Burning.

Molecular Weight: 46.07 g/mole

Color: Colorless. Clear

pH (1% soln/water): Not available.

Boiling Point: 78.5°C (173.3°F)

Melting Point: -114.1°C (-173.4°F)

Critical Temperature: 243°C (469.4°F)

Specific Gravity: 0.789 (Water = 1)

Vapor Pressure: 5.7 kPa (@ 20°C)

Vapor Density: 1.59 (Air = 1)

Volatility: Not available.

Odor Threshold: 100 ppm

Water/Oil Dist. Coeff.: The product is more soluble in water; log(oil/water) = -0.3

Ionicity (in Water): Not available.

Dispersion Properties: See solubility in water, methanol, diethyl ether, acetone.

Solubility:

Easily soluble in cold water, hot water. Soluble in methanol, diethyl ether, acetone.

Section 10: Stability and Reactivity Data

Stability: The product is stable.

Instability Temperature: Not available.

Conditions of Instability: Incompatible materials, heat, sources of ignition.

Incompatibility with various substances: Reactive with oxidizing agents, acids, alkalis.

Corrosivity: Non-corrosive in presence of glass.

Special Remarks on Reactivity:

Ethanol rapidly absorbs moisture from the air. Can react vigorously with oxidizers. The following oxidants have been demonstrated to undergo vigorous/explosive reaction with ethanol: barium perchlorate, bromine pentafluoride, calcium hypochlorite, chloryl perchlorate, chromium trioxide, chromyl chloride, dioxygen difluoride, disulfuryl difluoride, fluorine nitrate, hydrogen peroxide, iodine heptafluoride, nitric acid nitrosyl perchlorate, perchloric acid permanganic acid, peroxodisulfuric acid, potassium dioxide, potassium perchlorate, potassium permanganate, ruthenium(VIII) oxide, silver perchlorate, silver peroxide, uranium hexafluoride, uranyl perchlorate. Ethanol reacts violently/expodes with the following compounds: acetyl bromide (evolves hydrogen bromide) acetyl chloride, aluminum, sesquibromide ethylate, ammonium hydroxide & silver oxide, chlorate, chromic anhydride, cyanuric acid + water, dichloromethane + sulfuric acid + nitrate (or) nitrite, hydrogen peroxide + sulfuric acid, iodine + methanol + mercuric oxide, manganese perchlorate + 2,2-dimethoxy propane, perchlorates, permanganates + sulfuric acid, potassium superoxide, potassium tert-butoxide, silver & nitric acid, silver perchlorate, sodium hydrazide, sulfuric acid + sodium dichromate, tetrachlorosilane + water. Ethanol is also incompatible with platinum, and sodium. No really safe conditions exist under which ethyl alcohol and chlorine oxides can be handled. Reacts vigorously with acetyl chloride

Special Remarks on Corrosivity: Not available.

Polymerization: Will not occur.

Section 11: Toxicological Information

Routes of Entry: Absorbed through skin. Dermal contact. Eye contact. Inhalation. Ingestion.

Toxicity to Animals:

WARNING: THE LC50 VALUES HEREUNDER ARE ESTIMATED ON THE BASIS OF A 4-HOUR EXPOSURE. Acute oral toxicity (LD50): 3450 mg/kg [Mouse]. Acute toxicity of the vapor (LC50): 39000 mg/m3 4 hours [Mouse].

Chronic Effects on Humans:

CARCINOGENIC EFFECTS: A4 (Not classifiable for human or animal.) by ACGIH. MUTAGENIC EFFECTS: Mutagenic for mammalian somatic cells. Mutagenic for bacteria and/or yeast. TERATOGENIC EFFECTS: Classified PROVEN for human. DEVELOPMENTAL TOXICITY: Classified Development toxin [PROVEN]. Classified Reproductive system/toxin/female, Reproductive system/toxin/male [POSSIBLE]. Causes damage to the following organs: blood, the reproductive system, liver, upper respiratory tract, skin, central nervous system (CNS).

Other Toxic Effects on Humans:

Hazardous in case of skin contact (irritant), of inhalation. Slightly hazardous in case of skin contact (permeator), of ingestion.

Special Remarks on Toxicity to Animals:

Lowest Published Dose/Conc: LDL[Human] - Route: Oral; Dose: 1400 mg/kg LDL[Human child] - Route: Oral; Dose: 2000 mg/kg LDL[Rabbit] - Route: Skin; Dose: 20000 mg/kg

Special Remarks on Chronic Effects on Humans:

May affect genetic material (mutagenic) Causes adverse reproductive effects and birth defects (teratogenic) , based on moderate to heavy consumption. May cause cancer based on animal data. Human: passes through the placenta, excreted in maternal milk.

Special Remarks on other Toxic Effects on Humans:

Acute potential health effects: Skin: causes skin irritation Eyes: causes eye irritation Ingestion: May cause gastrointestinal tract irritation with nausea, vomiting, diarrhea, and alterations in gastric secretions. May affect behavior/central nervous system (central nervous system depression - amnesia, headache, muscular incoordination, excitation, mild euphoria, slurred speech, drowsiness, staggering gait, fatigue, changes in mood/personality, excessive talking, dizziness, ataxia, somnolence, coma/ narcosis, hallucinations, distorted perceptions, general anesthetic), peripheral nervous system (spastic paralysis)vision (diplopia). Moderately toxic and narcotic in high concentrations. May also affect metabolism, blood, liver, respiration (dyspnea), and endocrine system. May affect respiratory tract, cardiovascular(cardiac arrhythmias, hypotension), and urinary systems. Inhalation: May cause irritation of the respiratory tract and affect behavior/central nervous system with symptoms similar to ingestion. Chronic Potential Health Effects: Skin: Prolonged or repeated skin contact may casue dermatitis, an allergic reaction. Ingestion: Prolonged or repeated ingestion will have similiar effects as acute ingestion. It may also affect the brain.

Section 12: Ecological Information

Ecotoxicity: Ecotoxicity in water (LC50): 14000 mg/l 96 hours [Rainbow trout]. 11200 mg/l 24 hours [fingerling trout].

BOD5 and COD: Not available.

Products of Biodegradation:

Possibly hazardous short term degradation products are not likely. However, long term degradation products may arise.

Toxicity of the Products of Biodegradation: The product itself and its products of degradation are not toxic.

Special Remarks on the Products of Biodegradation: Not available.

Section 13: Disposal Considerations

Waste Disposal:

Waste must be disposed of in accordance with federal, state and local environmental control regulations.

Section 14: Transport Information

DOT Classification: CLASS 3: Flammable liquid.

Identification : Ethanol UNNA: 1170 PG: II

Special Provisions for Transport: Not available.

Section 15: Other Regulatory Information

Federal and State Regulations:

California prop. 65: This product contains the following ingredients for which the State of California has found to cause cancer, birth defects or other reproductive harm, which would require a warning under the statute: Ethyl alcohol 200 Proof (in alcoholic beverages) California prop. 65: This product contains the following ingredients for which the State of California has found to cause birth defects which would require a warning under the statute: Ethyl alcohol 200 Proof (in alcoholic beverages) Connecticut hazardous material survey.: Ethyl alcohol 200 Proof Illinois toxic substances disclosure to employee act: Ethyl alcohol 200 Proof Rhode Island RTK hazardous substances: Ethyl alcohol 200 Proof Pennsylvania RTK: Ethyl alcohol 200 Proof Florida: Ethyl alcohol 200 Proof Minnesota: Ethyl alcohol 200 Proof Massachusetts RTK: Ethyl alcohol 200 Proof Massachusetts spill list: Ethyl alcohol 200 Proof New Jersey: Ethyl alcohol 200 Proof Tennessee: Ethyl alcohol 200 Proof California - Directors List of Hazardous Substances (8 CCR 339): Ethyl alcohol 200 Proof TSCA 8(b) inventory: Ethyl alcohol 200 Proof

Other Regulations:

OSHA: Hazardous by definition of Hazard Communication Standard (29 CFR 1910.1200). EINECS: This product is on the European Inventory of Existing Commercial Chemical Substances.

Other Classifications:

WHMIS (Canada):

CLASS B-2: Flammable liquid with a flash point lower than 37.8°C (100°F). CLASS D-2A: Material causing other toxic effects (VERY TOXIC).

DSCL (EEC):

R11- Highly flammable. S7- Keep container tightly closed. S16- Keep away from sources of ignition - No smoking.

HMIS (U.S.A.):

Health Hazard: 2

Fire Hazard: 3

Reactivity: 0

Personal Protection: E

National Fire Protection Association (U.S.A.):

Health: 2

Flammability: 3

Reactivity: 0

Specific hazard:

Protective Equipment:

Gloves. Lab coat. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Wear appropriate respirator when ventilation is inadequate. Splash goggles.

Section 16: Other Information

References:

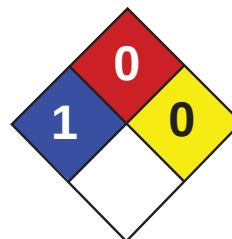
-SAX, N.I. Dangerous Properties of Industrial Materials. Toronto, Van Nostrand Reinold, 6e ed. 1984. -Material safety data sheet emitted by: la Commission de la Santé et de la Sécurité du Travail du Québec. -Hawley, G.G.. The Condensed Chemical Dictionary, 11e ed., New York N.Y., Van Nostrand Reinold, 1987. -The Sigma-Aldrich Library of Chemical Safety Data, Edition II. HSDB, RTECS, and LOLI databases.

Other Special Considerations: Not available.

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Health	3
Fire	0
Reactivity	0
Personal Protection	

Material Safety Data Sheet

Sodium Hypochlorite, 5% MSDS

Section 1: Chemical Product and Company Identification

Product Name: Sodium Hypochlorite, 5%

Catalog Codes: SLS1654

CAS#: Mixture.

RTECS: Not applicable.

TSCA: TSCA 8(b) inventory: Sodium hypochlorite; Sodium hydroxide; Water

CI#: Not applicable.

Synonym: Chlorine Bleach, Bleach, Soda Bleach, Chlorox; Sodium Hypochlorite, Solution, 5% Available Chlorine

Chemical Name: Hypochlorous acid, sodium salt, solution

Chemical Formula: Not applicable.

Contact Information:

Sciencelab.com, Inc.

14025 Smith Rd.

Houston, Texas 77396

US Sales: **1-800-901-7247**

International Sales: **1-281-441-4400**

Order Online: ScienceLab.com

CHEMTREC (24HR Emergency Telephone), call:

1-800-424-9300

International CHEMTREC, call: 1-703-527-3887

For non-emergency assistance, call: 1-281-441-4400

Section 2: Composition and Information on Ingredients

Composition:

Name	CAS #	% by Weight
Sodium hypochlorite	7681-52-9	4-7
Sodium hydroxide	1310-73-2	<1
Water	7732-18-5	>92

Toxicological Data on Ingredients: Sodium hypochlorite: ORAL (LD50): Acute: 5800 mg/kg [Mouse]. 8910 mg/kg [Rat].

Section 3: Hazards Identification

Potential Acute Health Effects:

Very hazardous in case of skin contact (irritant), of eye contact (irritant), of ingestion, . Hazardous in case of skin contact (corrosive), of eye contact (corrosive). Slightly hazardous in case of inhalation (lung sensitizer). Non-corrosive for lungs. Liquid or spray mist may produce tissue damage particularly on mucous membranes of eyes, mouth and respiratory tract. Skin contact may produce burns. Inhalation of the spray mist may produce severe irritation of respiratory tract, characterized by coughing, choking, or shortness of breath. Prolonged exposure may result in skin burns and ulcerations. Over-exposure by inhalation may cause respiratory irritation. Inflammation of the eye is characterized by redness, watering, and itching. Skin inflammation is characterized by itching, scaling, reddening, or, occasionally, blistering.

Potential Chronic Health Effects:

Slightly hazardous in case of skin contact (sensitizer). CARCINOGENIC EFFECTS: Classified 3 (Not classifiable for human.) by IARC [Sodium hypochlorite]. MUTAGENIC EFFECTS: Mutagenic for bacteria and/or yeast. [Sodium hypochlorite]. Mutagenic for mammalian somatic cells. [Sodium hydroxide]. TERATOGENIC EFFECTS: Not available. DEVELOPMENTAL TOXICITY: Not available. The substance may be toxic to lungs, mucous membranes, skin, eyes. Repeated or prolonged exposure to the substance can produce target organs damage. Repeated or prolonged contact with spray mist may produce chronic eye irritation and severe skin irritation. Repeated or prolonged exposure to spray mist may produce respiratory tract irritation leading to frequent attacks of bronchial infection.

Section 4: First Aid Measures**Eye Contact:**

Check for and remove any contact lenses. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Cold water may be used. Get medical attention immediately.

Skin Contact:

In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Cover the irritated skin with an emollient. Cold water may be used. Wash clothing before reuse. Thoroughly clean shoes before reuse. Get medical attention immediately.

Serious Skin Contact:

Wash with a disinfectant soap and cover the contaminated skin with an anti-bacterial cream. Seek medical attention.

Inhalation:

If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention immediately.

Serious Inhalation:

Evacuate the victim to a safe area as soon as possible. Loosen tight clothing such as a collar, tie, belt or waistband. If breathing is difficult, administer oxygen. If the victim is not breathing, perform mouth-to-mouth resuscitation. Seek medical attention.

Ingestion:

Do NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Loosen tight clothing such as a collar, tie, belt or waistband. Get medical attention if symptoms appear.

Serious Ingestion: Not available.

Section 5: Fire and Explosion Data

Flammability of the Product: Non-flammable.

Auto-Ignition Temperature: Not applicable.

Flash Points: Not applicable.

Flammable Limits: Not applicable.

Products of Combustion: Not available.

Fire Hazards in Presence of Various Substances: combustible materials, metals, organic materials

Explosion Hazards in Presence of Various Substances:

Slightly explosive in presence of open flames and sparks. Non-explosive in presence of shocks.

Fire Fighting Media and Instructions: Not applicable.

Special Remarks on Fire Hazards:

Releases chlorine when heated above 35 deg. C. The substance itself is non-combustible and does not burn. However, when heated to decomposition it emits corrosive and/or toxic fumes. May ignite combustibles. Fire risk in contact with organic materials. Contact with metals may evolve flammable hydrogen gas.

Special Remarks on Explosion Hazards:

Anydrous Sodium Hypochlorite is very explosive. Primary amines and calcium hypochlorite or sodium hypochlorite react to form normal chloroamines, which are explosive. Interaction of ethyleneimine with sodium (or other) hypochlorite gives the explosive N-chloro cmpd. Removal of formic acid from industrial waste streams with sodium hypochlorite soln becomes explosive at 55 deg C. Several explosions involving methanol and sodium hypochlorite were attributed to formation of methyl hypochlorite, especially in presence of acid or other esterification catalyst. Use of sodium hypochlorite soln to destroy acidified benzyl cyanide residues caused a violent explosion, thought to have been due to formation of nitrogen trichloride. (Sodium hypochlorite)

Section 6: Accidental Release Measures**Small Spill:**

Dilute with water and mop up, or absorb with an inert dry material and place in an appropriate waste disposal container.

Large Spill:

Corrosive liquid. Oxidizing material. Stop leak if without risk. Absorb with DRY earth, sand or other non-combustible material. Do not get water inside container. Avoid contact with a combustible material (wood, paper, oil, clothing...). Keep substance damp using water spray. Do not touch spilled material. Use water spray curtain to divert vapor drift. Prevent entry into sewers, basements or confined areas; dike if needed. Call for assistance on disposal. Be careful that the product is not present at a concentration level above TLV. Check TLV on the MSDS and with local authorities.

Section 7: Handling and Storage**Precautions:**

Keep locked up.. Keep container dry. Keep away from heat. Keep away from sources of ignition. Keep away from combustible material.. Do not ingest. Do not breathe gas/fumes/ vapor/spray. Never add water to this product. In case of insufficient ventilation, wear suitable respiratory equipment. If ingested, seek medical advice immediately and show the container or the label. Avoid contact with skin and eyes. Keep away from incompatibles such as reducing agents, combustible materials, organic materials, metals, acids.

Storage:

Keep container tightly closed. Keep container in a cool, well-ventilated area. Separate from acids, alkalies, reducing agents and combustibles. See NFPA 43A, Code for the Storage of Liquid and Solid Oxidizers. Air Sensitive Sensitive to light. Store in light-resistant containers.

Section 8: Exposure Controls/Personal Protection**Engineering Controls:**

Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value.

Personal Protection:

Face shield. Full suit. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Gloves. Boots.

Personal Protection in Case of a Large Spill:

Splash goggles. Full suit. Vapor respirator. Boots. Gloves. A self contained breathing apparatus should be used to avoid inhalation of the product. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.

Exposure Limits:

Sodium hypochlorite TWA: 1 CEIL: 1 (ppm as Cl₂) STEL: 1 (ppm as Cl₂) from ACGIH (TLV) [United States] Sodium hydroxide STEL: 2 (mg/m³) from ACGIH (TLV) [United States] TWA: 2 CEIL: 2 (mg/m³) from OSHA (PEL) [United States] CEIL: 2 (mg/m³) from NIOSH Consult local authorities for acceptable exposure limits.

Section 9: Physical and Chemical Properties

Physical state and appearance: Liquid.

Odor: Characteristic. Chlorine-like (Slight.)

Taste: Not available.

Molecular Weight: Not applicable.

Color: Colorless to light greenish yellow

pH (1% soln/water): Neutral.

Boiling Point: Decomposition temperature: 40°C (104°F)

Melting Point: Not available.

Critical Temperature: Not available.

Specific Gravity: 1.07 - 1.093 (Water = 1)

Vapor Pressure: 2.3 kPa (@ 20°C)

Vapor Density: The highest known value is 0.62 (Air = 1) (Water).

Volatility: Not available.

Odor Threshold: Not available.

Water/Oil Dist. Coeff.: Not available.

Ionicity (in Water): Not available.

Dispersion Properties: See solubility in water.

Solubility: Easily soluble in cold water.

Section 10: Stability and Reactivity Data

Stability: The product is stable.

Instability Temperature: Not available.

Conditions of Instability: Incompatible materials. light, air, heat

Incompatibility with various substances: Reactive with reducing agents, combustible materials, organic materials, metals, acids.

Corrosivity:

Extremely corrosive in presence of aluminum. Corrosive in presence of stainless steel(304), of stainless steel(316). Non-corrosive in presence of glass.

Special Remarks on Reactivity:

Decomposed by carbon dioxide from air. Slowly decomposes on contact with air. Unstable in air unless mixed with sodium hydroxide. Incompatible with ammonium acetate, ammonium carbonate, ammonium nitrate, ammonium oxalate, and ammonium phosphate. Decomposition of sodium hypochlorite takes place within a few seconds with these salts. Also incompatible with primary amines, phenyl acetonitrile, ethyleneimine, methanol, acidified benzyl cyanide, formic acid, urea, nitro compounds, methylcellulose, cellulose, aziridine, ether, ammonia. Mixing this product with chemicals (e.g. ammonia, acids, detergents, etc.) or organic matter (e.g. urine, feces, etc.) will release chlorine gas. Chloramine gas may be evolved when ammonia and bleach are mixed. Decomposed by hot water. Sensitive to light. Exposure to light accelerates decomposition.

Special Remarks on Corrosivity:

Sodium Hypochlorite is extremely corrosive to brass, and moderately corrosive to bronze. There is no corrosivity information for copper.

Polymerization: Will not occur.

Section 11: Toxicological Information

Routes of Entry: Absorbed through skin. Eye contact. Inhalation. Ingestion.

Toxicity to Animals: Acute oral toxicity (LD50): 5800 mg/kg [Mouse]. (Sodium hypochlorite).

Chronic Effects on Humans:

CARCINOGENIC EFFECTS: Classified 3 (Not classifiable for human.) by IARC [Sodium hypochlorite]. MUTAGENIC EFFECTS: Mutagenic for bacteria and/or yeast. [Sodium hypochlorite]. Mutagenic for mammalian somatic cells. [Sodium hydroxide]. Contains material which may cause damage to the following organs: lungs, mucous membranes, skin, eyes.

Other Toxic Effects on Humans:

Very hazardous in case of skin contact (irritant), of ingestion, . Hazardous in case of skin contact (corrosive), of eye contact (corrosive). Slightly hazardous in case of inhalation (lung sensitizer, lung corrosive).

Special Remarks on Toxicity to Animals: Not available.

Special Remarks on Chronic Effects on Humans: May affect genetic material (mutagenic) (Sodium hypochlorite)

Special Remarks on other Toxic Effects on Humans:

Potential Health Effects: Can cause severe irritation and possible burns to skin and eyes. Eye contact may also cause corneal and conjunctival edema, conjunctival hemorrhages. Contact with skin may also cause vesicular eruptions and eczematoid dermatitis which becomes evident upon re-exposure. Prolonged or repeated eye contact may cause conjunctivitis. Ingestion can cause burns to the digestive tract. Symptoms may include: 1. pain and inflammation of the mouth, pharynx, esophagus, and stomach, 2. erosion of the mucous membranes (chiefly of the stomach), nausea, vomiting, choking, coughing, hemorrhage, 3. circulatory collapse with cold and clammy skin (due to methemoglobinemia), cyanosis, and shallow respirations, 4. confusion, delirium, coma, 5. edema of the pharynx, glottis, larynx with stridor and obstruction, 6. perforation of the esophagus, or stomach, with mediastinitis or peritonitis. Inhalation causes slight to severe respiratory tract irritation and delayed pulmonary edema. Prolonged or repeated inhalation may cause allergic respiratory reaction (asthma).

Section 12: Ecological Information

Ecotoxicity: Not available.

BOD5 and COD: Not available.

Products of Biodegradation:

Possibly hazardous short term degradation products are not likely. However, long term degradation products may arise.

Toxicity of the Products of Biodegradation: The product itself and its products of degradation are not toxic.

Special Remarks on the Products of Biodegradation: Not available.

Section 13: Disposal Considerations

Waste Disposal:

Dilute with water and flush to sewer if local ordinances allow, otherwise, whatever cannot be saved for recovery or recycling should be managed in an appropriate and approved waste disposal facility. Waste must be disposed of in accordance with federal, state and local environmental control regulations.

Section 14: Transport Information

DOT Classification: Class 8: Corrosive material

Identification: : Hypochlorite solution UNNA: 1791 PG: III

Special Provisions for Transport: Not available.

Section 15: Other Regulatory Information

Federal and State Regulations:

Illinois toxic substances disclosure to employee act: Sodium hydroxide Illinois chemical safety act: Sodium hydroxide New York release reporting list: Sodium hydroxide Rhode Island RTK hazardous substances: Sodium hydroxide Pennsylvania RTK: Sodium hypochlorite; Sodium hydroxide Florida: Sodium hypochlorite Minnesota: Sodium hypochlorite; Sodium hydroxide Massachusetts RTK: Sodium hypochlorite; Sodium hydroxide New Jersey: Sodium hypochlorite; Sodium hydroxide Louisiana spill reporting: Sodium hydroxide TSCA 8(b) inventory: Sodium hypochlorite; Sodium hydroxide; Water CERCLA: Hazardous substances.: Sodium hypochlorite: 100 lbs. (45.36 kg); Sodium hydroxide: 1000 lbs. (453.6 kg);

Other Regulations: OSHA: Hazardous by definition of Hazard Communication Standard (29 CFR 1910.1200).

Other Classifications:

WHMIS (Canada): CLASS E: Corrosive liquid.

DSCL (EEC):

R8- Contact with combustible material may cause fire. R31- Contact with acids liberates toxic gas. R36/38- Irritating to eyes and skin. S28- After contact with skin, wash immediately with plenty of water. S36/37/39- Wear suitable protective clothing, gloves and eye/face protection. S45- In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible).

HMIS (U.S.A.):

Health Hazard: 3

Fire Hazard: 0

Reactivity: 0

Personal Protection:

National Fire Protection Association (U.S.A.):

Health: 1

Flammability: 0

Reactivity: 0

Specific hazard:

Protective Equipment:

Gloves. Full suit. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Wear appropriate respirator when ventilation is inadequate. Face shield.

Section 16: Other Information

References: Not available.

Other Special Considerations: Not available.

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SAFETY DATA SHEET

Propane

Section 1. Identification

GHS product identifier	: Propane
Chemical name	: propane
Other means of identification	: Propyl hydride; n-Propane; Dimethyl methane; Bottled gas; propane in gaseous state; propane liquefied, n-Propane; Dimethylmethane; Freon 290; Liquefied petroleum gas; Lpg; Propyl hydride; R 290; C3H8; UN 1075; UN 1978; A-108; Hydrocarbon propellant.
Product use	: Synthetic/Analytical chemistry.
Synonym	: Propyl hydride; n-Propane; Dimethyl methane; Bottled gas; propane in gaseous state; propane liquefied, n-Propane; Dimethylmethane; Freon 290; Liquefied petroleum gas; Lpg; Propyl hydride; R 290; C3H8; UN 1075; UN 1978; A-108; Hydrocarbon propellant.
SDS #	: 001045
Supplier's details	: Airgas USA, LLC and its affiliates 259 North Radnor-Chester Road Suite 100 Radnor, PA 19087-5283 1-610-687-5253
24-hour telephone	: 1-866-734-3438

Section 2. Hazards identification

OSHA/HCS status	: This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).
Classification of the substance or mixture	: FLAMMABLE GASES - Category 1 GASES UNDER PRESSURE - Liquefied gas

GHS label elements

Hazard pictograms

:



Signal word

: Danger

Hazard statements

: Extremely flammable gas.
Contains gas under pressure; may explode if heated.
May cause frostbite.
May form explosive mixtures in Air.
May displace oxygen and cause rapid suffocation.

Precautionary statements

General

: Read and follow all Safety Data Sheets (SDS'S) before use. Read label before use. Keep out of reach of children. If medical advice is needed, have product container or label at hand. Close valve after each use and when empty. Use equipment rated for cylinder pressure. Do not open valve until connected to equipment prepared for use. Use a back flow preventative device in the piping. Use only equipment of compatible materials of construction. Always keep container in upright position. Approach suspected leak area with caution.

Prevention

: Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.

Response

: Leaking gas fire: Do not extinguish, unless leak can be stopped safely. Eliminate all ignition sources if safe to do so.

Storage

: Protect from sunlight when ambient temperature exceeds 52°C/125°F. Store in a well-ventilated place.

Section 2. Hazards identification

- Disposal** : Not applicable.
- Hazards not otherwise classified** : In addition to any other important health or physical hazards, this product may displace oxygen and cause rapid suffocation.

Section 3. Composition/information on ingredients

- Substance/mixture** : Substance
- Chemical name** : propane
- Other means of identification** : Propyl hydride; n-Propane; Dimethyl methane; Bottled gas; propane in gaseous state; propane liquefied, n-Propane; Dimethylmethane; Freon 290; Liquefied petroleum gas; Lpg; Propyl hydride; R 290; C₃H₈; UN 1075; UN 1978; A-108; Hydrocarbon propellant.

CAS number/other identifiers

CAS number : 74-98-6

Product code : 001045

Ingredient name	%	CAS number
Propane	100	74-98-6

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

Description of necessary first aid measures

- Eye contact** : Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Get medical attention if irritation occurs.
- Inhalation** : Remove victim to fresh air and keep at rest in a position comfortable for breathing. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Get medical attention if adverse health effects persist or are severe. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.
- Skin contact** : Wash contaminated skin with soap and water. Remove contaminated clothing and shoes. To avoid the risk of static discharges and gas ignition, soak contaminated clothing thoroughly with water before removing it. Get medical attention if symptoms occur. Wash clothing before reuse. Clean shoes thoroughly before reuse.
- Ingestion** : As this product is a gas, refer to the inhalation section.

Most important symptoms/effects, acute and delayed

Potential acute health effects

- Eye contact** : No known significant effects or critical hazards.
- Inhalation** : No known significant effects or critical hazards.
- Skin contact** : No known significant effects or critical hazards.
- Frostbite** : Try to warm up the frozen tissues and seek medical attention.
- Ingestion** : As this product is a gas, refer to the inhalation section.

Over-exposure signs/symptoms

- Eye contact** : No specific data.
- Inhalation** : No specific data.
- Skin contact** : No specific data.

Section 4. First aid measures

Ingestion : No specific data.

Indication of immediate medical attention and special treatment needed, if necessary

Notes to physician : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.

Specific treatments : No specific treatment.

Protection of first-aiders : No action shall be taken involving any personal risk or without suitable training. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

Suitable extinguishing media : Use an extinguishing agent suitable for the surrounding fire.

Unsuitable extinguishing media : None known.

Specific hazards arising from the chemical : Contains gas under pressure. Extremely flammable gas. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion.

Hazardous thermal decomposition products : Decomposition products may include the following materials:
carbon dioxide
carbon monoxide

Special protective actions for fire-fighters : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Contact supplier immediately for specialist advice. Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool. If involved in fire, shut off flow immediately if it can be done without risk. If this is impossible, withdraw from area and allow fire to burn. Fight fire from protected location or maximum possible distance. Eliminate all ignition sources if safe to do so.

Special protective equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

For non-emergency personnel : Accidental releases pose a serious fire or explosion hazard. No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Shut off all ignition sources. No flares, smoking or flames in hazard area. Avoid breathing gas. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.

For emergency responders : If specialised clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

Environmental precautions : Ensure emergency procedures to deal with accidental gas releases are in place to avoid contamination of the environment. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

Small spill : Immediately contact emergency personnel. Stop leak if without risk. Use spark-proof tools and explosion-proof equipment.

Section 6. Accidental release measures

- Large spill** : Immediately contact emergency personnel. Stop leak if without risk. Use spark-proof tools and explosion-proof equipment. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

- Protective measures** : Put on appropriate personal protective equipment (see Section 8). Contains gas under pressure. Avoid contact with eyes, skin and clothing. Avoid breathing gas. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Store and use away from heat, sparks, open flame or any other ignition source. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Use only non-sparking tools. Empty containers retain product residue and can be hazardous. Do not puncture or incinerate container. Use equipment rated for cylinder pressure. Close valve after each use and when empty. Protect cylinders from physical damage; do not drag, roll, slide, or drop. Use a suitable hand truck for cylinder movement.

- Advice on general occupational hygiene** : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

- Conditions for safe storage, including any incompatibilities** : Store in accordance with local regulations. Store in a segregated and approved area. Store away from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10). Eliminate all ignition sources. Keep container tightly closed and sealed until ready for use. Cylinders should be stored upright, with valve protection cap in place, and firmly secured to prevent falling or being knocked over. Cylinder temperatures should not exceed 52 °C (125 °F).

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Ingredient name	Exposure limits
Propane	NIOSH REL (United States, 10/2013). TWA: 1800 mg/m ³ 10 hours. TWA: 1000 ppm 10 hours. OSHA PEL (United States, 2/2013). TWA: 1800 mg/m ³ 8 hours. TWA: 1000 ppm 8 hours. OSHA PEL 1989 (United States, 3/1989). TWA: 1800 mg/m ³ 8 hours. TWA: 1000 ppm 8 hours.

- Appropriate engineering controls** : Use only with adequate ventilation. Use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. The engineering controls also need to keep gas, vapor or dust concentrations below any lower explosive limits. Use explosion-proof ventilation equipment.

- Environmental exposure controls** : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

Section 8. Exposure controls/personal protection

- Hygiene measures** : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.
- Eye/face protection** : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: safety glasses with side-shields.
- Skin protection**
- Hand protection** : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.
- Body protection** : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product. When there is a risk of ignition from static electricity, wear anti-static protective clothing. For the greatest protection from static discharges, clothing should include anti-static overalls, boots and gloves.
- Other skin protection** : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
- Respiratory protection** : Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary. Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator.

Section 9. Physical and chemical properties

Appearance

- Physical state** : Gas. [Liquefied compressed gas.]
- Color** : Colorless.
- Molecular weight** : 44.11 g/mole
- Molecular formula** : C₃H₈
- Boiling/condensation point** : -161.48°C (-258.7°F)
- Melting/freezing point** : -187.6°C (-305.7°F)
- Critical temperature** : 96.55°C (205.8°F)
- Odor** : Odorless.BUT MAY HAVE SKUNK ODOR ADDED.
- Odor threshold** : Not available.
- pH** : Not available.
- Flash point** : Closed cup: -104°C (-155.2°F)
Open cup: -104°C (-155.2°F)
- Burning time** : Not applicable.
- Burning rate** : Not applicable.
- Evaporation rate** : Not available.
- Flammability (solid, gas)** : Extremely flammable in the presence of the following materials or conditions: open flames, sparks and static discharge and oxidizing materials.
- Lower and upper explosive (flammable) limits** : Lower: 1.8%
Upper: 8.4%
- Vapor pressure** : 109 (psig)
- Vapor density** : 1.6 (Air = 1)

Section 9. Physical and chemical properties

Specific Volume (ft ³ /lb)	: 8.6206
Gas Density (lb/ft ³)	: 0.116 (25°C / 77 to °F)
Relative density	: Not applicable.
Solubility	: Not available.
Solubility in water	: 0.0244 g/l
Partition coefficient: n-octanol/water	: 1.09
Auto-ignition temperature	: 287°C (548.6°F)
Decomposition temperature	: Not available.
SADT	: Not available.
Viscosity	: Not applicable.

Section 10. Stability and reactivity

Reactivity	: No specific test data related to reactivity available for this product or its ingredients.
Chemical stability	: The product is stable.
Possibility of hazardous reactions	: Under normal conditions of storage and use, hazardous reactions will not occur.
Conditions to avoid	: Avoid all possible sources of ignition (spark or flame). Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition.
Incompatible materials	: Oxidizers
Hazardous decomposition products	: Under normal conditions of storage and use, hazardous decomposition products should not be produced.
Hazardous polymerization	: Under normal conditions of storage and use, hazardous polymerization will not occur.

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Not available.

IDLH : 2100 ppm

Irritation/Corrosion

Not available.

Sensitization

Not available.

Mutagenicity

Not available.

Carcinogenicity

Not available.

Reproductive toxicity

Not available.

Teratogenicity

Not available.

Section 11. Toxicological information

Specific target organ toxicity (single exposure)

Not available.

Specific target organ toxicity (repeated exposure)

Not available.

Aspiration hazard

Not available.

Information on the likely routes of exposure : Not available.

Potential acute health effects

Eye contact : No known significant effects or critical hazards.
Inhalation : No known significant effects or critical hazards.
Skin contact : No known significant effects or critical hazards.
Ingestion : As this product is a gas, refer to the inhalation section.

Symptoms related to the physical, chemical and toxicological characteristics

Eye contact : No specific data.
Inhalation : No specific data.
Skin contact : No specific data.
Ingestion : No specific data.

Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

Potential immediate effects : Not available.
Potential delayed effects : Not available.

Long term exposure

Potential immediate effects : Not available.
Potential delayed effects : Not available.

Potential chronic health effects

Not available.

General : No known significant effects or critical hazards.
Carcinogenicity : No known significant effects or critical hazards.
Mutagenicity : No known significant effects or critical hazards.
Teratogenicity : No known significant effects or critical hazards.
Developmental effects : No known significant effects or critical hazards.
Fertility effects : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

Not available.

Section 12. Ecological information

Toxicity

Not available.

Persistence and degradability

Not available.

Bioaccumulative potential

Product/ingredient name	LogP _{ow}	BCF	Potential
Propane	1.09	-	low

Mobility in soil

Soil/water partition coefficient (K_{oc}) : Not available.

Other adverse effects : No known significant effects or critical hazards.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Empty Airgas-owned pressure vessels should be returned to Airgas. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Empty containers or liners may retain some product residues. Do not puncture or incinerate container.

Section 14. Transport information

	DOT	TDG	Mexico	IMDG	IATA
UN number	UN1978	UN1978	UN1978	UN1978	UN1978
UN proper shipping name	PROPANE	PROPANE	PROPANE	PROPANE	PROPANE
Transport hazard class(es)	2.1 	2.1 	2.1 	2.1 	2.1 
Packing group	-	-	-	-	-
Environment	No.	No.	No.	No.	No.
Additional information	<u>Limited quantity</u> Yes. <u>Packaging instruction</u> Passenger aircraft Quantity limitation: Forbidden. Cargo aircraft Quantity limitation: 150 kg <u>Special provisions</u> 19, T50	Product classified as per the following sections of the Transportation of Dangerous Goods Regulations: 2.13-2.17 (Class 2). <u>Explosive Limit and Limited Quantity Index</u> 0.125 <u>ERAP Index</u> 3000	-	-	<u>Passenger and Cargo Aircraft</u> Quantity limitation: 0 Forbidden <u>Cargo Aircraft Only</u> Quantity limitation: 150 kg

Section 14. Transport information

	For domestic transportation only, UN1075 may be substituted for the UN number shown as long as the substitution is consistent on package markings, shipping papers, and emergency response information. See 49 CFR 172.102 Special Provision 19. Containers of NON-ODORIZED liquefied petroleum gas must be marked either NON-ODORIZED or NOT ODORIZED as of September 30, 2006. [49 CFR 172.301(f), 326(d), 330(c) and 338 (e)]	<u>Passenger Carrying Ship Index</u> 65 <u>Passenger Carrying Road or Rail Index</u> Forbidden <u>Special provisions</u> 29, 42			
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“Refer to CFR 49 (or authority having jurisdiction) to determine the information required for shipment of the product.”

Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code : Not available.

Section 15. Regulatory information

U.S. Federal regulations : **TSCA 8(a) CDR Exempt/Partial exemption:** Not determined
United States inventory (TSCA 8b): This material is listed or exempted.
Clean Air Act (CAA) 112 regulated flammable substances: propane

Clean Air Act Section 112 (b) Hazardous Air Pollutants (HAPs) : Not listed

Clean Air Act Section 602 Class I Substances : Not listed

Clean Air Act Section 602 Class II Substances : Not listed

DEA List I Chemicals (Precursor Chemicals) : Not listed

DEA List II Chemicals (Essential Chemicals) : Not listed

SARA 302/304

Composition/information on ingredients

No products were found.

SARA 304 RQ : Not applicable.

SARA 311/312

Classification : Refer to Section 2: Hazards Identification of this SDS for classification of substance.

State regulations

Section 15. Regulatory information

Massachusetts	: This material is listed.
New York	: This material is not listed.
New Jersey	: This material is listed.
Pennsylvania	: This material is listed.

International regulations

International lists

National inventory

Australia	: This material is listed or exempted.
Canada	: This material is listed or exempted.
China	: This material is listed or exempted.
Europe	: This material is listed or exempted.
Japan	: This material is listed or exempted.
Malaysia	: This material is listed or exempted.
New Zealand	: This material is listed or exempted.
Philippines	: This material is listed or exempted.
Republic of Korea	: This material is listed or exempted.
Taiwan	: This material is listed or exempted.

Canada

WHMIS (Canada)	: Class A: Compressed gas. Class B-1: Flammable gas.
CEPA Toxic substances	: This material is not listed.
Canadian ARET	: This material is not listed.
Canadian NPRI	: This material is listed.
Alberta Designated Substances	: This material is not listed.
Ontario Designated Substances	: This material is not listed.
Quebec Designated Substances	: This material is not listed.

Section 16. Other information

Canada Label requirements	: Class A: Compressed gas. Class B-1: Flammable gas.
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Hazardous Material Information System (U.S.A.)

Health	*	1
Flammability		4
Physical hazards		2

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings are not required on SDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.

The customer is responsible for determining the PPE code for this material.

National Fire Protection Association (U.S.A.)



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Section 16. Other information

Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

Procedure used to derive the classification

Classification	Justification
Flam. Gas 1, H220 Press. Gas Liq. Gas, H280	Expert judgment Expert judgment

History

Date of printing : 6/28/2017

Date of issue/Date of revision : 6/28/2017

Date of previous issue : 10/20/2015

Version : 0.02

Key to abbreviations : ATE = Acute Toxicity Estimate
BCF = Bioconcentration Factor
GHS = Globally Harmonized System of Classification and Labelling of Chemicals
IATA = International Air Transport Association
IBC = Intermediate Bulk Container
IMDG = International Maritime Dangerous Goods
LogPow = logarithm of the octanol/water partition coefficient
MARPOL 73/78 = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)
UN = United Nations

References : Not available.

Indicates information that has changed from previously issued version.

Other special considerations : The information below is given to call attention to the issue of "Naturally occurring radioactive materials". Although Radon-222 levels in the product represented by this MSDS do not present any direct Radon exposure hazard, customers should be aware of the potential for Radon daughter build up within their processing systems, whatever the source of their product streams. Radon-222 is a naturally occurring radioactive gas which can be a contaminant in natural gas. During subsequent processing, Radon tends to be concentrated in Liquefied Petroleum Gas streams and in product streams having a similar boiling point range. Industry experience has shown that this product may contain small amounts of Radon-222 and its radioactive decay products, called Radon "daughters". The actual concentration of Radon-222 and radioactive daughters in the delivered product is dependent on the geographical source of the natural gas and storage time prior to delivery. Process equipment (i.e. lines, filters, pumps and reaction units) may accumulate significant levels of radioactive daughters and show a gamma radiation reading during operation. A potential external radiation hazard exists at or near any pipe valve or vessel containing a Radon enriched stream, or containing internal deposits of radioactive material due to the transmission of gamma radiation through its wall. Field studies reported in the literature have not shown any conditions that subject workers to cumulative exposures in excess of general population limits. Equipment emitting gamma radiation should be presumed to be internally contaminated with alpha emitting decay products which may be a hazard if inhaled or ingested. Protective equipment such as coveralls, gloves, and respirator (NIOSH/MHSA approved for high efficiency particulates and radionuclides, or supplied air) should be worn by personnel entering a vessel or working on contaminated process equipment to prevent skin contamination, ingestion, or inhalation of any residues containing alpha radiation. Airborne contamination may be minimized by handling scale and/or contaminated materials in a wet state.

Notice to reader

Section 16. Other information

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein.

Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.

22.0 APPENDIX: EMPLOYEE MANUAL

Bound separately

23.0 APPENDIX: LOG OF INSPECTIONS, RECORDS, AND DATA COLLECTION

Insert here or bind separately