

EXHIBIT B

**CITY OF COMMERCE WATER SYSTEM
STANDARD OPERATING PROCEDURES
2017**

These Operating Standards are provided to ensure that a reliable supply of safe, high quality water is delivered to the City's water customers. These Operating Standards are incorporated into the Water System Lease Agreement (Agreement) between the City of Commerce (City) and California Water Service Company (CWS), as Exhibit B – Operating Standards.

CWS is required to submit regular reports as described below to the City regarding system performance, operation and maintenance activities, capital improvements, customer service practices, and other activities. CWS will allow the City to periodically review and evaluate the condition, operation, and improvements required for the City of Commerce's Water System (see enclosed map of system. The City agrees to respond to any requests from CWS for capital improvements or changes to operation and maintenance activities performed under this Agreement in a timely manner. Given proper notice, the City maintains the right to inspect the facilities and review records relating to the City's own portion of Commerce's water system to ensure the long-term viability of the System.

The City shall receive a copy of all reports and other official correspondence submitted by CWS to any regulatory or oversight agency including, but not limited to United States Environmental Protection Agency (USEPA), California Environmental Protection Agency, California Department of Public Health, Central Basin Municipal Water District, Water Replenishment District of Southern California (WRD) and any other government or other oversight agency that may have jurisdiction, relative to the City-owned water system. Such reports shall be provided to the City and shall include a brief executive summary of the document. CWS shall provide to the City a copy of any and all correspondence delivered to or received from regulatory and/or oversight agencies which might be of consequence to the City as the owner of the water system. The City shall maintain the right, as the owner of the system, to attend meetings and conference calls with regulatory and other agencies but shall not take action which will impede or delay CWS's ability to operate the water system.

These Operating Standards shall be enforceable in accordance with the terms of the Agreement. CWS shall be responsible for any and all penalties assessed by regulatory or other agencies relative to the system during the term of the Agreement, if such penalties are due to CWS' operation of the water system and were not caused by the City's action or inaction. Knowingly falsifying documentation or omitting information to meet regulatory or City reporting and/or technical requirements may cause the City to take appropriate action.

Nothing set forth in these Operating Standards shall modify or alter CWS's obligation to manage and operate the Water System in compliance with all applicable laws and the terms of the Agreement.

WATER SYSTEM OPERATING STANDARDS

1. General Requirements

CWS will be fully responsible at their own cost for the operation, maintenance, and management of the water distribution system, water wells, booster stations, storage tanks and all associated facilities of the Water System. CWS shall operate, maintain, and manage the Water System in accordance with the Agreement and applicable laws, regulations, and ordinances, as well as requirements of the City including oversight of the operation by a certified California Department of Health Service (DHS) Water Treatment Operator of a Grade II or better. The continuous supply of water in compliance with all applicable regulations is of primary importance. CWS shall provide uninterrupted operation of the Water System and shall operate the Water System on a continuous basis, 24 hours per day, seven days per week throughout the term of the Agreement. CWS shall have staff available 24 hours per day, seven (7) days per week during the entire term of the Agreement to respond to system failures and emergencies. CWS shall provide meter reading, billing, customer service, and other ancillary services associated with the operation of the System. In addition to activities directly associated with the treatment and distribution of water, CWS's responsibilities also include all maintenance of grounds, landscaping, buildings, and equipment comprising the Water System.

CWS shall, at all times, keep the Water System in good repair and working order and shall operate, maintain and manage the Water System in a professional, efficient, and economical manner. Operational decision making shall be based on the following objectives:

- Protection of
 - Health and welfare of the public.
 - The health and safety of the operating staff.
 - Preservation of the Water System equipment and facilities.
 - The environment.
- Preservation of the long-term capability to provide water services in accordance with legal, regulatory, and customer service requirements.
- Maximization of Water System operational efficiency.
- Compliance with applicable regulations and requirements of California Environmental Protection Agency, United States Environmental Protection Agency (USEPA), California Department of Public Health, the City and other government or oversight agencies with applicable jurisdiction.
- Compliance with the City's current obligations in accordance with Agreements between the City and third parties, including other water service providers, in accordance with the Agreement.

CWS shall be required to perform the following, subject to the specific terms of the agreement and Operating Standards:

- Operate, maintain, and manage the Water System.
- Treat water to maintain regulatory water quality and other requirements.
- Perform corrective, predictive, preventative, and ongoing maintenance of the Water System.
- Perform analytical sampling, testing, analyzing, and reporting.
- Maintain a computerized maintenance management system.
- Maintain necessary records, including laboratory sampling and analytical results, in accordance with regulatory requirements.
- Provide emergency services associated with the Water System and its operation, as required.
- Maintain grounds and buildings.
- Keep facilities secure and correct/improve security measures as identified by CWS, regulatory agencies, or as part of other security evaluations.
- Keep facilities clean.
- Maintain records documenting compliance with applicable laws, regulations, and ordinances, as well as requirements of the City.
- Provide routine reports to the City.
- Make available, upon request by the City, information necessary to document compliance with applicable laws, regulations, and ordinances as well as compliance with these Operating Standards.
- Subject to the terms and conditions of the Agreement, identify and execute any necessary capital improvements to the Water System.

CWS shall be responsible for complying with all applicable Federal, State, and local laws and regulations pertaining to the Water System and shall comply with all approvals, licenses, permits, and certifications governing the performance of its Services hereunder issued for or with respect to the System. In exchange for performing these functions, the City agrees to act upon requests from CWS for necessary rate adjustments to fund these activities in a timely manner. If an agreement cannot be reached on additional funding, the parties may agree to modify or delay implementation of certain activities under the Agreement.

2. Computer Software

CWS shall provide the hardware and software necessary for customer care and billing, construction management, payment and procurement, assets management and similar applications. As major upgrades are necessary to the hardware and/or software, City and CWS shall agree upon an appropriate fee for data migration and cost sharing of

hardware and/or software upgrades. Should the provided software require licensing, maintenance costs or other such fees, CWS will communicate these fees to City for their consideration. City agrees to incorporate such software costs into future rate increase requests, as needed.

At the end of the term of the Agreement or at the time of termination of the Agreement, all hardware and software purchased by the City shall be returned to the City. CWS will use its reasonable efforts to convey the customer billing information and maintenance records along with other electronic records in use at that time, in their entirety if possible, to the City or a new System operator. If City does not own hardware or software directly, CWS will supply data in the most effective and economical means possible.

3. General Operation and Management Standards

CWS shall operate and maintain the Water System in accordance with current applicable laws, regulations, and Industry Standards, as defined by the Agreement, regulatory agencies, and/or applicable American Water Works Association (AWWA) Standards.

AWWA standards establish minimum recommended requirements for parts, materials, and practices in the production and conveyance of drinking water. CWS shall follow regulatory requirements and the current version of AWWA standards, as a minimum requirement, for the construction, upgrade, replacement, and operation of the Water System.

Should applicable laws, regulations or Industry Standards change in such fashion as to cause operational inefficiencies, or should new laws, regulations or Industry Standards be created, CWS and City shall discuss and agree on appropriate modifications to services and/or rates.

4. Water Quality Management

CWS shall satisfy applicable regulatory requirements, including but not limited to Federal, State, and local laws, regulations and ordinances including Title 22 of the California Code of Regulations and other codes that apply to the operation of the System and distribution of water to customers. Regulatory requirements include, but are not limited to all water quality requirements, construction requirements, residuals handling requirements, chemical storage regulations, and operator certification requirements. CWS will schedule and collect water samples to test for microbiological, inorganic and organic constituents; transport to certified labs; prepare monitoring plans as applicable by current law, ordinance or requirement compliance with regulations

applies to regulations existing at the time of execution of the Agreement and regulations that become applicable during the term of the Agreement.

Should laws, regulations or ordinances be enacted requiring a substantial increase in sampling and monitoring volume or new constituent added, CWS and City shall agree on appropriate modifications to services and/or rates.

5. Aesthetic Water Quality Parameters

CWS shall ensure that the water meets all secondary standards, including, but not limited to taste, odor and color, as required by Section 64449 of Title 22. CWS shall report a summary of taste and odor complaints to the City. On an annual basis, CWS's report shall include data for the previous year, by category, for comparison purposes.

6. Performance Requirements

In order to protect public health and enhance customer satisfaction, high quality water must be continuously produced regardless of the source of water. The System shall deliver the quantity of water sufficient to satisfy water demands and the quality of water to meet applicable regulatory requirements as operational conditions allow.

7. Laboratory Standards

CWS shall use its certified laboratory for analysis or contract for services from an accredited water treatment plant laboratory, and the laboratory must be available to respond to distribution system water quality issues, in addition to performing routine water quality analyses. Each report shall be certified by the responsible Laboratory Director and a copy provided to the City upon completion.

CWS will be responsible for all costs associated with current routine regulatory required sampling and analysis. Should regulations change in the future requiring an increase in testing, CWS and City will work to implement necessary rate adjustments to fund these changes.

8. Cross Connection Control and Backflow Prevention

CWS shall implement a cross-connection control and backflow prevention program for the distribution system. The program shall meet applicable law and DHS regulations, shall review all relevant plans, inspecting installation of backflow prevention devices (BPDs), and shall administer an annual testing program for BPDs.

City shall support CWS by communicating Cross Connection Control requirements as

part of new development plan check and developing local ordinances as appropriate.

CWS shall develop and implement a five year plan to assess individual properties and prioritize them by potential hazard. CWS shall submit this plan to the City by month end in April each year.

9. Water Loss

CWS shall perform water audits that may be required by regulatory agencies.

CWS shall not operate water system in such a way as to encourage water loss or permit any ongoing event in which water is being wasted. CWS shall notify City of any customer that continues to waste water after being notified to cease ongoing water waste.

10. Valve Exercising and Replacement

CWS shall incorporate the City's water system into its existing Valve Exercising Plan. At the discretion of CWS, individual valves may be exercised more frequently. CWS shall follow its Valve Exercising Program which closely follows AWWA standards.

CWS shall identify and document all valves requiring repair or replacement and shall be responsible for repair or replacement of such valves in a timely manner, but in all cases the time to repair or replace such valves shall not be greater than one (1) year from the initial date of identification of the repair or replacement need.

Water quality and isolation issues (avoiding service interruptions) shall be considered as part of the exercising program.

The valve exercise program should be performed in conjunction with the systematic flushing program and/or hydrant maintenance and testing program.

CWS shall maintain records of valves exercised by the unique valve identifier to facilitate verification by the City of valve exercise work performed.

11. System Flushing

CWS shall flush localized areas as necessary to address water quality concerns and complaints. Special attention shall be given to dead-ends and blow-offs.

12. Hydrant Maintenance and Fire Flow Requests

CWS shall maintain a Hydrant Maintenance and Flow Testing Program. Hydrants shall be inspected and tested/exercised at least once every 5 years. All hydrants shall be painted once every 5 years. A list of hydrants repaired/replaced shall be provided annually.

From time to time developers, customers and other individuals request fire flow tests. These tests shall follow current CWS Tariff FF procedures and rules.

13. Metering

CWS shall provide an operational computer-based meter reading system that records the volume of water entering the water distribution system and from what source. CWS shall accumulate historical data related to the volume of water pumped into the system. All customer accounts and other water uses, including City properties, shall be metered except fire protection services as defined in CWS Tariffs.

All metering devices shall meet the requirements of AWWA or other applicable standards.

a) Testing

To ensure metering accuracy, CWS shall test or replace meters at the frequencies recommended in AWWA Manual M6 or as required by applicable regulations.

b) Meter Repair and Replacement

CWS shall maintain a program to replace or repair defective meters. The program shall verify conformance with the defined guidelines of AWWA Manual M6 and the meter manufacturer's recommendations.

c) Documentation and Reporting

CWS shall submit to the City, on an annual basis, a report summarizing customer meter calibration, testing, replacement, and associated activities.

14. Storage Reservoirs

a) Inspection and Maintenance

CWS shall establish a storage tank maintenance program that includes periodic

cleaning and visual inspection of facilities. Cleaning of water storage facilities shall be based on the results of internal inspections conducted every five (5) years or more frequently at CWS's option or as required by regulation. Full internal and external inspections shall be conducted in accordance with AWWA Manual M42. CWS shall conduct a formal external visual inspection of the storage facility at least annually to assess and repair environmental damage and verify the integrity of vents and screens. The inspection shall include an assessment of the physical security of the facility. Maintenance activities, such as coating or painting, shall be based on American National Standards Institute (ANSI) /AWWA Standards D102 and D103.

b) Disinfection

Storage facilities shall be disinfected in accordance with ANSI/AWWA C652 if drained for inspection and/or other maintenance. Disposal of chlorinated water shall be performed in accordance with local, State, and federal regulations. If divers are used, the divers and equipment shall be disinfected in accordance with ANSI/AWWA C652.

c) Documentation

CWS shall provide annual reports to the City documenting:

- i. Number and identification of tanks inspected and tested.
- ii. Number and identification of tanks requiring maintenance, repair, or replacement.
- iii. Schedule for maintenance, repair, or replacement.
- iv. Summary of maintenance, repair, or replacement activities completed.
- v. Identification of maintenance, repair, or replacement required in the future based on the results of inspections.

15. Booster Pump Station Operations and Maintenance

CWS shall monitor and record pump station operating data and maintenance activities.

16. Pipeline Replacement

CWS shall maintain a program for evaluating and replacing existing portions of the distribution system, as required based on the physical condition of the pipes as determined through inspections, leak/break records, flow testing results, and other criteria. The initial assessment shall be developed as part of the Water System Master Plan which is to be prepared by CWS. CWS shall update Master Plan and add problematic or potentially problematic pipes based on an evaluation of leak history and

other data. City agrees to work with CWS to implement necessary rate adjustments to fund this program or provide other funding mechanisms.

17. Disinfection of New or Repaired Pipes

All new or repaired sections of pipe shall be protected from contamination and disinfected in accordance with the requirements of ANSI/AWWA C651 and applicable regulations and permit requirements. Chlorinated water shall be disposed of in accordance with local, State, and Federal regulations.

18. Underground Service Alert requests

CWS shall respond to underground service alerts for field marking or staking of City water facilities, to the extent of CWS's actual knowledge of the location of City facilities.

19. New User Connections

New service connections, replacements or upgrades requested by a customer shall be funded by customer/developer. CWS shall install new connections to the Water System to serve new customers, or for existing customers who require a new connection. CWS will document the location and depth of the connection of all services larger than 2" and maintain that information as permanent record. CWS will provide an annual record of the installation to the City. City shall provide support to CWS by directing developers and entities that have projects which impact the City system to CWS.

20. Customer Service

CWS shall provide customer service to City customers in accordance with CPUC General Order 103-A. Customers will receive the same level of excellent customer service provided to all CWS customers.

21. Housekeeping Procedures and Cleanliness

The Water System, including the distribution system, water treatment plants and related facilities shall be maintained in a neat and orderly condition. Operation and maintenance functions should be conducted in such a manner that site safety and water quality are not compromised.

22. Record Keeping, Data Review, and Reporting Requirements

In addition to any reports or records required by applicable law, including but not limited to the reports and records identified above, CWS shall prepare:

- "As built" plans relating to any significant repairs, improvements or modifications to the Water System that are carried out during the term of the Lease; update all water records, specifications and system standards;
- Service and complaint reports with a listing of customer complaints and inquiries, reason for customer contact and resolution of the matter; and
- Maintain distribution system maps and plat maps.

If CWS becomes aware, either through a notice sent by another governmental agency or CWS's own actions, that the operation or maintenance of the Water System is not in full compliance with all applicable laws, regulations, permits and governmental approvals, CWS shall immediately send written notice of such non-compliance to the City.

23. Frequency of Reports

Immediate

- Written notice of water system non-compliance Section 23

Monthly

- Water Quality Reports filed with CDPH. Section 4 & 5

Annual

- Taste and odor complaints. Section 4
- Flushing Activities. Section 11
- Fire hydrants. Section 12
- Meter calibration, testing, replacement, and associated activities. Section 14;c
- Storage Reservoirs. Section. 14;c
- Summary of information customer calls. Section 20;c
- Record drawings for all Water System construction of new or repaired below-grade distribution system facilities. Section 29
- All valves requiring repair or replacement. Section 10
- New connections or upgrades to existing connections. Section 19

Other:

- Final Study Report on Capital Planning within 12 months of new agreement. Section 21
- Long-term planned capital improvements and associated activities discussed at

quarterly meetings, (progress, planned projects for subsequent year etc).

- Water Supply Forecasting Plan. The statistical data from CWS - East Los Angeles districts Urban Water Management Plan shall be used to generate a Water Supply Forecasting Plan. Plan shall be updated as CWS UWMP is revised.

24. Source Water Management

CWS shall be responsible for grounds maintenance at all water well, reservoir and booster pumping stations sites. CWS shall be responsible for the source water protection protocols at City wellheads. CWS will act as steward in groundwater affairs for the City but is not responsible for the groundwater aquifer.

25. Site Safety and Security

CWS shall take all precautions necessary to safeguard persons entering water facilities and to protect water quality and Water System properties. CWS shall develop and implement a Security Plan that will include, but not be limited to, the following goals:

- a. Prevent unauthorized entry;
- b. Prevent interference with treatment processes;
- c. Prevent injury to employees, visitors, or neighbors; and
- d. Prevent loss or damage to City property.

26. Emergency Response Plan

In addition to providing a Call Center that will be available 24 hours per day, 7 days per week, including holidays, where customers can report emergencies or complaints, CWS will respond to all emergency calls within one (1) hour. CWS will maintain an emergency communications system, provide or have access to equipment required to perform emergency repair work to vital system equipment and water mains.

CWS shall maintain an Emergency Response Plan (ERP). The ERP shall be coordinated with the City's Emergency Operations Plan and the Public Works and Development Services Department and adhere to the guidelines established by the ANSI/AWWA Standard, G440-11 - Emergency Preparedness Practices. The ERP shall be coordinated with the City's Emergency Operations Plan and the Public Works and Development Services Department. CWS shall also adhere to the guidelines established by the ANSI/AWWA Standard, G440-11 -Emergency Preparedness Practices.

27. Emergency Repairs

In the event that either CWS or the City determines that an emergency has occurred involving any part of the Water System that threatens the public's health or safety, then the determining Party shall notify the other Party of the emergency. The Parties shall cooperate with each other and take all actions necessary to eliminate the emergency. For purposes of this Lease "emergency repairs" shall mean all non-recurring physical repairs and modifications to the Water System directly related to the health and safety of the Commerce Water System. Emergency repairs are cost in excess of \$1,000. Emergency repairs shall include a specific description and location of the proposed repair and estimated total cost of the repair, and the reasons for the repair. The City shall be solely responsible for the cost of the emergency repairs. CWS shall be responsible for executing repairs with the City's approval.

28. Capital Improvement Program

CWS shall implement a long-term Capital Improvement Program (CIP) and updated annually. The cost of preparation shall be prepared at the sole cost of CWS. CWS shall submit an annual updated CIP to the City by March 1st of each year. This CIP shall include a five (5) year term of planned capital improvements, associated activities and costs for each improvement.

For purposes of this Lease "capital project" shall mean all large non-recurring improvements to the Water System. Capital projects shall include a specific description and location of the proposed project, associated costs, and the reason for the project. CWS shall identify proposed adjustments to water rates for City consideration or provide alternative funding mechanisms for the cost of the capital projects. CWS shall be responsible for executing the CIP with the City's approval.

29. Inspection of New Construction

CWS shall be responsible for inspection of construction work associated with the Water System, including new construction and repairs. CWS Inspector will insure that the construction methods and materials are consistent with CWS construction standards and specifications. CWS will prepare and maintain record drawings for all Water System construction and shall record on one-line diagrams adequate information describing the location of new or repaired below-grade distribution system facilities.

30. Operator Training

CWS is responsible for process safety, and health training for CWS employees. Training will include familiarization with the Standard Operating Procedures (SOP's) and other system protocols specific to Commerce's system. Safety training will be

conducted periodically for new and existing employees.

31. Quarterly Meetings

Subject to periodic modification by the parties, Quarterly meetings between the City and CWS shall be held in January, April, July and October to provide regular and open discussions related to issues of concern, including a report on water quality and customer complaints.

32. MS4 Permit Requirements

There are two sets of MS4 Permit requirements that are relevant to CWS activities. The first set applies to discharges from a community water system to a municipal separate storm sewer system (MS4) regardless of ownership of the facilities. The specific MS4 Permit sections are Part III Discharge Prohibitions, and more specifically Part III.2.a.ii. for discharges from drinking water supplier distribution systems. The second set of requirements that may be applicable since the system is owned by the City and therefore operation of the system may be considered a Public Agency Activity subject to Part VI.D.9. of the MS4 Permit. The introductory sentence of Part VI.D.9.a states:

Each Permittee shall implement a Public Agency Activities Program to minimize storm water impacts from Permittee-owned or operated facilities and activities and to identify opportunities to reduce storm water pollution impacts from areas of existing development. (p. 122-123)

DISCHARGE PROHIBITION PROVISIONS APPLICABLE TO COMMUNITY WATER SYSTEM DISCHARGES:

The MS4 Permit adopted by the Los Angeles Regional Water Quality Control Board on November 8, 2012 for coastal watersheds of Los Angeles County provides for a conditional exemption from the non-stormwater discharge prohibition provisions of the permit for discharges that are essential public services discharge activities and are directly or indirectly required by other state or federal statute and/or regulation, including discharges from drinking water supplier distribution systems.

Drinking water supplier distribution system releases include:

- drinking water system failures;
- pressure releases;
- system maintenance;
- distribution line testing;

- flushing and dewatering of pipes, reservoirs and vaults;
- minor non-invasive well maintenance activities not involving chemical additions.

If any of these discharges are regulated by NPDES Permit No. CAG674001, CAG994005, or another separate or general NPDES Permit, then the discharges are not subject to the MS4 Permit because a discharge may not be subject to more than one NPDES Permit. But otherwise, in order to preserve the conditional exemption which allows these essential discharges to the municipal storm drain system, CWS must exercise four types of measures consistent with the MS4 Permit:

- 1) Notify the City of planned and unplanned discharges greater than 100,000 gallons,
- 2) Monitor the discharges,
- 3) Maintain records of all discharges, and
- 4) Implement best management practices (BMPs) to minimize pollutants in the discharges.

These requirements are more fully described in Part III Discharge Prohibitions of Order No. R4-2012-0175 (MS4 Permit), and are summarized as follows:

- 1. Notification:** No less than 72 hours prior to a planned discharge and as soon as possible after an unplanned discharge of 100,000 gallons or greater CWS must notify the City by contacting the following staff and/or alternate staff members below by telephone during normal business hours or email:

City contact information:

Gina Nila, Deputy Director of Public Works Operations

ginan@ci.commerce.ca.us

(323) 722-4805, ext. 2839

- 2. Monitoring:** CWS must monitor pollutants of concern in the discharge. Pollutants of concern from drinking water supplier distribution system releases may include:
 - trash and debris (including organic matter),
 - total suspended solids (TSS),
 - residual chlorine,
 - pH, and

- any pollutant for which there is a water quality-based effluent limitation (WQBEL) in Part VI.E of the MS4 Permit.

WQBELs for the City of Commerce include:

- cadmium,
- copper,
- lead,
- zinc,
- E. coli, and
- trash.

Determination of the pollutants of concern for a particular discharge shall be based on an evaluation of the potential for the constituent(s) to be present in the discharge at levels that may cause or contribute to exceedances of applicable WQBELs or receiving water limitations. Thus if any of the constituents for which WQBELs and receiving water limitations have been established in Part VI.E of the MS4 Permit could be reasonably expected to be present in the discharge at concentrations above the Minimum Levels listed in Table E-2 of the MS4 Permit, those constituents should also be monitored.

3. Recordkeeping: The following information must be collected and maintained by CWS for all discharges to the MS4 greater than 100,000 gallons, whether planned or unplanned:

- a) name of discharger,
- b) date and time of notification (for planned discharges),
- c) method of notification,
- d) location of discharge,
- e) discharge pathway,
- f) receiving water,
- g) date of discharge,
- h) time of the beginning and end of the discharge,
- i) duration of the discharge,
- j) flow rate or velocity,
- k) total number of gallons discharged,
- l) type of dechlorination equipment used,
- m) type of dechlorination chemicals used,
- n) concentration of residual chlorine,
- o) type(s) of sediment controls used,
- p) pH of discharge,
- q) type(s) of volumetric and velocity controls used, and
- r) field and laboratory monitoring data for pollutants of concern.

Records are to be retained for five years and made available upon request by the City of Commerce.

4. Implementation: CWS must implement appropriate best management practices based on the type of release activity and the potential pollutants of concern associated with the type of release. Detailed BMPs can be found in American Water Works Association (AWWA)(CA-NV Section) *Guidelines for the Development of Your Best Management Practices (BMP) Manual for Drinking Water System Releases(2005)* or an equivalent industry standard BMP manual. The types of BMPs that may be appropriate to implement after consultation with AWWA Guidelines and use of best professional judgment include:

Administrative BMPs-These may include operational practices that reduce potential pollutants at the source such as: conservation and reuse of water, training/education of workers, improved material storage and waste management practices, establishing procedures for responding to unplanned releases, maintaining documentation, and planning, scheduling and developing operating procedures.

Erosion and Sediment Control BMPs-These may include slowing the flow of water, protecting bare earth surfaces, use of piping to bypass sediment, and/or prevent water from reaching sediment by using berms or dikes. As specified in the MS4 Permit, these implementation BMPs must include ensuring that there are no potential sources of pollutants in the flow path of the discharge.

Dechlorination BMPs-Treatment to remove or replace chlorine atoms in water after measuring/monitoring for chlorine residual can be accomplished through use of dechlorination agents (ex. sodium sulfite, or ascorbic acid) or use of dechlorination equipment (ex. Dechlor mat or diffuser) or other equally effective methods so long as appropriate safety measures are implemented including careful review of material safety data sheets for the chemicals to be used.

On-site storage or treatment BMPs-Analyze the water and choose a non-site storage or treatment option that will remove or treat the contaminants/constituents of concern.

PUBLIC AGENCY ACTIVITY REQUIREMENTS

Public Agency Activities provisions of the MS4 Permit which are applicable to CWS activities due to the public ownership of the facilities are summarized in the following table. For complete discussion of these requirements, CWS should consult the referenced MS4 Permit sections.

<i>MS4 Permit Reference</i>	<i>MS4 Permit Language</i>	<i>Applicability</i>
<p>Part VI.D.9.b. Public Construction Activities Management</p> <p>Part VI.D.7. Planning and Land Development</p> <p>Part VI.D.8 Construction</p>	<p>For City-owned water system projects or activities that meet the MS4 Permit definition of “construction,” CWS will comply with the following:</p> <ul style="list-style-type: none"> i. Implement Planning and Land Development requirements from Part VI.D.7. if project size thresholds are triggered for the project per the City’s LID Ordinance and Green Streets Policy. ii. For all construction sites regardless of size, CWS must obtain a building permit through the City’s Building & Safety Department and implement an effective combination of erosion and sediment control BMPs listed in Table 12, page 114 of the MS4 Permit. iii. For construction sites disturbing 1 acre or greater, CWS must obtain coverage under the Statewide Construction General Permit, obtain a building permit through the City’s Public Works and Development Services Department, and implement an effective combination of erosion and sediment control BMPs listed in Tables 13, 14, and 15, pages 118 and 119 of the MS4 Permit. 	<p>Applies to the construction of new lines or facilities. Does not apply to activities which meet the MS4 Permit definition of routine maintenance including updating existing lines or replacing existing lines with new materials or pipes.</p>
Part VI.D.9.c. Public Facility Inventory	CWS will provide a list of City-owned facilities operated by CWS so that the City may include them in its inventory of public facilities. CWS will update the list annually.	City will consider whether these facilities that are potential sources of stormwater pollution should be included in the public facility inventory for storm water management.
Part VI.D.9.d. Inventory of Existing Development for Retrofitting Opportunities	CWS will provide a list of City-owned parcels operated by CWS which may afford the opportunity for retrofit to reduce the discharge of storm water pollutants to the municipal storm drain system.	City will consider whether to incorporate these parcels into the City’s inventory of existing development retrofit opportunities.

<i>MS4 Permit Reference</i>	<i>MS4 Permit Language</i>	<i>Applicability</i>
Part VI.D.9.e. Public Agency Facility and Activity Management	CWS will implement effective source control BMPs for any applicable activities with the potential for storm water pollutant generation as listed in Table 18, page 127 of the MS4 Permit.	Activities conducted in exposure to stormwater with the potential for generating pollutant generating activities, e.g., cleaning, operation and maintenance activities, repairs.
Part VI.D.9.f. Vehicle and Equipment Washing	CWS will prevent the discharge of any vehicle or equipment wash water to the MS4 and implement BMPs as described in Part VI.D.9.f. of the MS4 Permit to ensure that such discharges do not occur.	Management of vehicle or equipment wash water.
Part VI.D.9.g. Landscape, Park and Recreational Facilities Management	CWS will implement effective source control BMPs for any applicable activities listed in Table 18, page 127 of the MS4 Permit, including the implementation of an Integrated Pest Management Program and protocols for pesticide and fertilizer use per Part VI.D.9.g of the MS4 Permit	If no applicable activities being conducted within City's jurisdiction or on City facilities by CWS, then not applicable.
Part VI.D.9.h. Storm Drain Operation and Maintenance	CWS will inspect and maintain any storm water structural treatment controls located within facilities operated by CWS in accordance with Part VI.D.9.h.x.	Applies to storm water structural control measures installed on City-owned facilities managed by CWS.
Part VI.D.9.i. Streets, Roads and Parking Facilities Maintenance	CWS will inspect, clean and sweep parking lots on CWS operated facilities within the City at least twice per month and utilize appropriate BMPs to keep them clear of excessive oil buildup	Applies to parking lots on facilities operated by CWS.
Part VI.D.9.j. Emergency Procedures	CWS will document methods used to reduce threat to water quality during emergency repairs. If repairs are major and require more than one week, CWS will notify City staff as soon as possible but no later than 72 hours of the onset of the emergency so that City staff can determine whether an emergency self-waiver should be invoked.	Applies to emergency repairs which may result in threat to storm water quality.

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Exhibit B – Operating Standards

<i>MS4 Permit Reference</i>	<i>MS4 Permit Language</i>	<i>Applicability</i>
Part VI.D.9.k. Training	CWS will annually submit a certification with documentation to the City that employees whose interactions, jobs, and activities may affect storm water quality have been trained to: 1) promote a clear understanding of the potential for activities to pollute storm water, and 2) identify opportunities to require, implement, and maintain appropriate BMPs in their line of work.	CWS employees or contractors whose interactions, jobs and activities affect storm water discharges within City.