

Section 3

Non-Stormwater Discharge Component



3.1 Introduction

Section B.1 in the Permit requires that the City effectively prohibit all types of non-stormwater discharges into its MS4 unless such discharges are either authorized by a separate National Pollutant Discharge Elimination System (NPDES) permit; or not prohibited in accordance with sections B.2 and B.3 of the Permit.

Section B.2 of the Permit, identifies the categories of non-stormwater discharges that are not prohibited (that is, allowable) unless the City or the Regional Board identifies the discharge category as a significant source of pollutants to waters of the U.S. Any discharge category that is found to be a significant source of pollutants shall either be prohibited or the City must develop and required the implementation of appropriate control measures to reduce the discharge of pollutants to the MEP. Any changes to the list of allowable non-stormwater discharges must be reported to the Regional Board pursuant to section J – Reporting.

Non-Stormwater Discharges Not Prohibited by the Permit:

- a. Diverted stream flows;
- b. Rising ground waters;
- c. Uncontaminated ground water infiltration [as defined at 40 CFR 35.2005(20)] to MS4s;
- d. Uncontaminated pumped ground water;
- e. Foundation drains;
- f. Springs;
- g. Water from crawl space pumps;
- h. Footing drains;
- i. Air conditioning condensation;
- j. Flows from riparian habitats and wetlands;
- k. Water line flushing;
- l. Landscape irrigation;
- m. Discharges from potable water sources not subject to NPDES Permit No. CAG679001, other than water main breaks;
- n. Irrigation water;
- o. Lawn watering;
- p. Individual residential car washing; and
- q. Dechlorinated swimming pool discharges.

In addition, per Section B.3 in the Permit, emergency fire fighting flows (i.e., flows necessary for the protection of life or property) do not require BMPs and need not be prohibited (that is, are allowable); and the City of Del Mar must develop and implement a program to reduce pollutants from non-emergency fire fighting flows (i.e., flows from controlled or practice blazes and maintenance activities) identified by the City to be significant sources of pollutants to waters of the United States.

The City's evaluation of non-stormwater discharges was performed to comply with the Permit's requirements by first considering the existing non-stormwater discharges and their categorization, assessing new information regarding pollutants from those sources and finally reviewing the existing BMP requirements. The City's evaluation is provided in Sections 3.1 – 3.3, and non-emergency fire fighting in Section 3.4, below.

3.2 Non-Stormwater Discharge Categories Evaluation

This section identifies the categories of non-stormwater discharges listed in Permit section B.2 that the City of Del Mar has determined to be a significant source of pollutants to waters of the U.S.

In Del Mar, a non-stormwater discharge that is not prohibited, that is allowable, can enter the City's MS4 as long as it does not pose a risk to water quality and beneficial uses and employs BMPs to the MEP.

The City of Del Mar's evaluation of the non-stormwater discharge categories listed in the Permit considers whether discharges fall into the following:

1. The discharge is a significant source of pollutants to waters of the U.S., or
2. The discharge is not a significant source of pollutants to waters of the U.S., or
3. There is insufficient evidence to determine whether the discharge is a significant source of pollutants to waters of the U.S.

If a discharge is found to be a significant source of pollutants to waters of the United States, it must be prohibited or the City must develop and required the implementation of appropriate BMPs to reduce the discharge of pollutants to the MEP. The latter of the two situations does not require a discharge prohibition, but may also require the establishment of BMPs to reduce pollutants to the MEP.

The results of the City evaluation of non-stormwater discharges are summarized in Table 3.2-1.

3.3 Prohibited Non-Stormwater Discharge Categories

Del Mar has identified residential car washing to be a non-stormwater discharge with the potential to create significant source of pollutants to waters of the U.S and has prohibited the discharge to the MS4 on the City's right-of-way. Individual residential car washing on private property must be conducted in the manner describe below in order to not be a significant source. The second group of

3.3.1 Individual Residential Car Washing on Private Property

Individual residential car washing is permitted on private property but must comply with the BMPs described in the City's Municipal Code Section 11.30.080. The requirements in this section apply to all Residential Dischargers as determined by the City. Also, all Residential Dischargers must install, implement and maintain the BMPs identified in Section 11.30.070 B. as described for all Dischargers.

3.4 Control Measures for Non-Prohibited (Allowable) Non-Stormwater Discharges

This section identifies the categories of non-stormwater discharges determined to be a significant source of pollutants to waters of the U.S. that will not be prohibited by the City, and identifies the appropriate control measures that will be implemented for each to reduce the discharge of pollutants to the MEP. The implementation of BMPs for these Non-prohibited

discharges will be periodically assess by the City to determine if any changes in the categorization (as non-prohibited) or BMPs are necessary.

3.4.1 BMPs for Non-Prohibited (Allowable) and Prohibited Discharges

For each non-prohibited discharge category, Del Mar has verified the selection of BMPs that must be implemented to the MEP.

Del Mar will endeavor to identify practical and enforceable BMPs that will reduce or eliminate the introduction of contaminants from non-prohibited discharges to its MS4. The Permit does not explicitly require the establishment of new BMPs. For low threat discharges, Del Mar may therefore conceivably forego the requirement of additional BMPs if it concludes that existing practices are sufficient to achieve MEP. Conversely, Del Mar may prohibit discharges even when they have not been found to be significant pollutant sources or on a case-by-case basis. This may be done as a preventive measure, or because the imposition of specific BMPs is determined to be impracticable (i.e., there are no practical ways to effectively manage the discharge).

These non-prohibited discharges apply to any municipal, industrial, commercial, or residential sources that Del Mar determines may contribute a significant pollutant load to its MS4. If Del Mar determines that any of the non-stormwater discharge categories listed in this section are also subject to the BMP requirements of other applicable Permit sections, the requirements of Permit section B.2 should take precedence (i.e., if the discharge is a significant source, it must be prohibited rather than pollutants in it reduced to the MEP).

Table 3.4-1 below lists Del Mar's exempted non-stormwater discharge categories, and identifies the BMPs that must be used to reduce pollutants to the MEP.

3.5 Program for Non-Emergency Fire Fighting Flows

This section describes the City's program to reduce pollutants from non-emergency fire fighting flows (i.e., flows from controlled or practice blazes and maintenance activities) determined to be a significant source of pollutants to waters of the U.S.

The City of Del Mar Fire Department conducts very limited non-emergency fire fighting activities, as defined in the Permit, and implements BMPs specific to the activity as appropriate. The Fire Department is aware that any changes to non-emergency fire fighting activities or training exercises must be reviewed by the Clean Water Program and that each activity must take into account implementing BMPs to the MEP.

The City of Del Mar has developed and implemented a program to reduce pollutants from non-emergency fire fighting flows (i.e., flows from controlled or practice blazes and maintenance activities) identified by the City to be significant sources of pollutants to waters of the United States. The Non-emergency Fire Fighting section is included in the Municipal Component – Section 6.

**Table 3.2-1
Del Mar's Non-Stormwater Discharge Evaluation Worksheet**

Discharge Category	Significant Pollutant Source?			Prohibited?		Required Best Management Practices ¹
	Yes	No	Undetermined	Yes	No	
Diverted stream flows		X			X	No. Not found in Del Mar
Rising ground waters		X			X	Divert to pervious areas, if practicable
Uncontaminated ground water infiltration to the MS4		X			X	Identify sources/repair to the MS4 or divert to pervious areas, if practicable
Uncontaminated pumped ground water		X			X	Coordinate with Engineering or Public Works so the water can be directed to pervious surfaces or used for irrigation on site.
Foundation drains		X			X	Coordinate with Engineering or Public Works so the water can be directed to pervious surfaces or used for irrigation on site.
Springs		X			X	Divert to pervious areas, if practicable
Water from crawl space pumps		X			X	Coordinate with Engineering or Public Works so the water can be used for irrigation or pervious areas.
Footing drains		X			X	Coordinate with Engineering or Public Works so the water can be used for irrigation or pervious areas.
Air conditioning condensation		X			X	Divert to pervious areas
Flows from riparian habitats and wetlands		X			X	None
Water line flushing		X			X	Coordinate with Public Works – Use energy dissipation and dechlorinators.
Landscape irrigation	X				X	Monitor water conservation and regular maintenance of irrigation system to prevent nuisance runoff flow to the storm drain or street.

(1) Detailed BMP information is found in Table 3.3-1

**Table 3.2-1
Del Mar's Non-Stormwater Discharge Evaluation Worksheet
(Continued)**

Discharge Category	Significant Pollutant Source?			Prohibited?		Required Best Management Practices ¹
	Yes	No	Undetermined	Yes	No	
Discharges from potable water sources, other than main breaks		X			X	Coordinate with Public Works – Use energy dissipation and dechlorinators.
Irrigation water	X				X	Monitor water conservation and regular maintenance of irrigation system to prevent nuisance runoff flow to the storm drain or street.
Lawn watering	X				X	Monitor water conservation and regular maintenance of irrigation system to prevent nuisance runoff flow to the storm drain or street.
Individual residential car washing on private property	X			X		Wash car on pervious areas. Use dry cleaning methods (bucket and cloth) preferred. Prevent runoff from reaching the MS4, public/private street or alley. Limit use of soap. Car washing in the City's Right-of-Way is PROHIBITED.
Dechlorinated swimming pool discharges			X		X	Must contact Public Works Department for sanitary sewer discharge authorization or Clean Water Program for street or storm drain discharge. A discharge permit may be required.

(1) Detailed BMP information is found in Table 3.3-1

**Table 3.4-1
 Del Mar's Non-Prohibited (Allowable) Non-Stormwater Discharge
 Categories and BMPs**

Discharge Category	Best Management Practices (BMPs)	
<ul style="list-style-type: none"> - Diverted stream flows - Flows from riparian habitats and wetlands - Springs 	<ul style="list-style-type: none"> - These discharge sources are not found in Del Mar 	
<ul style="list-style-type: none"> - Rising ground water 	<ul style="list-style-type: none"> - Diversion to pervious areas 	<ul style="list-style-type: none"> - If contaminants are suspected, provide treatment
<ul style="list-style-type: none"> - Uncontaminated ground water infiltration to the MS4 	<ul style="list-style-type: none"> - Identify source and determine if water conservation measures will reduce discharge 	<ul style="list-style-type: none"> - MS4 preventive maintenance - Repair locations where infiltration occurs, when practical
<ul style="list-style-type: none"> - Water line flushing - Discharges from potable water sources other than water main breaks - Uncontaminated pumped ground water 	<ul style="list-style-type: none"> - Coordinate with Engineering or Public Works so the water can be used for other purposes (irrigation, etc) - Water conservation 	<ul style="list-style-type: none"> - Containment / diversion to pervious areas - Require dechlorinators to be used - Require energy dissipaters as appropriate
<ul style="list-style-type: none"> - Landscaping irrigation - Irrigation water - Lawn watering 	<ul style="list-style-type: none"> - Encourage the use of: <ul style="list-style-type: none"> • Drip irrigation • Water conservation • Xeriscape • Soaker hoses 	<ul style="list-style-type: none"> - Regular checking and maintenance of irrigation systems to prevent runoff/overspray - Pesticide / fertilizer management - Nuisance flows prohibited
<ul style="list-style-type: none"> - Foundation drains - Water from crawl space pumps - Footing drains 	<ul style="list-style-type: none"> - Divert the flow to a pervious area - Water conservation - Redirection of surface drainage (roof downspouts, etc.) - Limit infiltration by sealing the foundations 	<ul style="list-style-type: none"> - Sump pump - Grading / sloping to prevent drainage to subsurface spaces - Remove occupant-related moisture sources - Reuse water (i.e. irrigation)
<ul style="list-style-type: none"> - Air conditioning condensate 	<ul style="list-style-type: none"> - Divert the flow to a pervious area - Condensate pumps - Divert to sewer 	<ul style="list-style-type: none"> - Encourage the use of shallow pan-condensate removal unit - Encourage the use of shallow pan-evaporation