

**DOCKETED**

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<b>TN #:</b>	237339
<b>Document Title:</b>	Annual Compliance Report RY 2020 for GGS_7of8 parts
<b>Description:</b>	Annual Compliance Report for PG&E Gateway Generating Station (00-AFC-01C) for RY 2020
<b>Filer:</b>	Angel B. Espiritu
<b>Organization:</b>	PG&E Gateway Generating Station
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	3/29/2021 10:58:06 AM
<b>Docketed Date:</b>	3/29/2021

Gateway Generating Station  
(00-AFC-1C)

Annual Compliance Report No. 12

Exhibit 6

Copy of Notice of Intent (NOI) and Revised  
SWPPP (October 2018) to comply with the  
requirements of Industrial General Permit  
(SOIL & WATER-3)

No changes relative to submitted Exhibit 6  
in ACR #10



State Water Resources Control Board  
**NOTICE OF INTENT**

GENERAL PERMIT TO DISCHARGE STORM WATER  
ASSOCIATED WITH INDUSTRIAL ACTIVITY (WQ ORDER No. 2014-0057-DWQ)  
(Excluding Construction Activities)



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

WDID: 5S071021950

Status: Active

**Operator Information**

Type: Private Business

Name: Pacific Gas Electric Company

Contact Name: Tim Wisdom

Address: PO Box 770000

Title: Plant Manager

Address 2: \_\_\_\_\_

Phone Number: 925-522-7812

City/State/Zip: San Francisco CA 94177

Email Address: T1WY@pge.com

Federal Tax ID: \_\_\_\_\_

**Facility Information**

Level: \_\_\_\_\_

Contact Name: Diana Furman

Title: Environmental Compliance Manager

Site Name: Gateway Generating Station

Address: 3225 Wilbur Ave

City/State/Zip: Antioch CA 94509

Site Phone #: 925-522-7838

County: Contra Costa

Email Address: dmwr@PGE.com

Latitude: 38.01228 Longitude: -121.75859

Site Size: 32.5 Acres

Industrial Area Exposed to Storm Water: 22 Acres

Percent of Site Impervious (Including Rooftops): 28 %

**SIC Code Information**

1. 4911 Electric Services

2. \_\_\_\_\_

3. \_\_\_\_\_

**Additional Information**

Receiving Water: San Joaquin River Flow: Indirectly

Storm Drain System: \_\_\_\_\_

Compliance Group: \_\_\_\_\_

RWQCB Jurisdiction: Region 5S - Sacramento

Phone: 916-464-3291

Email: r5s\_stormwater@waterboards.ca.gov

**Certification**

Name: Alvin Thoma

Date: October 12, 2016

Title: Senior Plant Manager

# Stormwater Pollution Prevention Plan

## Gateway Generating Station

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WDID#: 5S07I021950

Facility Address: 3225 Wilbur Avenue, Antioch, CA 94509

**Facility Contact:**

**Angel B. Espiritu**, Environmental Compliance Manager  
Pacific Gas & Electric Company  
(925) 522-7838

*Prepared for*



Storm Water Quality Group  
3401 Crow Canyon Road, San Ramon, CA  
Jeremy Laurin, Storm Water Work Supervisor  
(925) 719-4466

Initial Preparation Date: December 2014  
Revision Date: October 2018

## **EXECUTIVE SUMMARY**

This storm water pollution prevention plan (SWPPP) was prepared in accordance with the requirements of the California State Water Resources Control Board (SWRCB) Industrial Storm Water Permit for Discharges Associated with Industrial Activity (Order No. 2014-0057-DWQ) which was adopted on April 1, 2014. This permit replaces Order No. 97-03-DWQ which had been in effect from August 1, 1997 through June 30, 2015.

This SWPPP identifies and evaluates all sources of pollutants that may affect the quality of industrial storm water discharges and authorized non-storm water discharges, identifies and describes the minimum best management practices (BMPs) and any advanced BMPs implemented to reduce or prevent pollutants in industrial storm water discharges and authorized non-storm water discharges.

Pacific Gas and Electric Company shall fully implement this SWPPP by July 1, 2015. The SWPPP will be revised whenever necessary and will be certified and submitted electronically to the SWRCB via the Storm Water Multi-Application and Report Tracking System (SMARTS).

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## ACRONYMS AND ABBREVIATIONS

AST	Aboveground Storage Tank
BMP	Best Management Practice
CFR	Code of Federal Regulations
COC	Chain of Custody
CWA	Clean Water Act
DDT	Dichlorodiphenyltrichloroethane
ECM	Environmental Compliance Manager
ELAP	Environmental Laboratory Accreditation Program
ELG	Effluent Limitation Guideline
ERA	Exceedance Response Action
General Permit	Industrial Storm Water Permit for Discharges Associated with Industrial Activity
HMBP	Hazardous Materials Business Plan
LRP	Legally Responsible Person
mg/L	Milligrams per liter
NAL	Numeric Action Level
NEC	No Exposure Certification
NOI	Notice of Intent
NOT	Notice of Termination
NPDES	National Pollutant Discharge Elimination System
NSWD	Non-Storm Water Discharge
OSHA	Occupational Health and Safety Administration
PG&E	Pacific Gas and Electric Company
PPT	Pollution Prevention Team
PRDs	Permit Registration Documents
QISP	Qualified Industrial Storm Water Practitioner
QSE	Qualifying Storm Event
RWQCB	Regional Water Quality Control Board
SIC	Standard Industrial Classification
SMARTS	Storm Water Multi-Application and Report Tracking System
SPCC	Spill Prevention Control and Countermeasure
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
WDID	Waste Discharge Identification

## STORM WATER POLLUTION PREVENTION PLAN SIGNATURE AND CERTIFICATION

I am duly authorized to sign reports required by the California State Water Resources Control Board Industrial Storm Water Permit for Discharges Associated with Industrial Activity. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Tim Wisdom  
Tim Wisdom, Sr. Plant Manager

Feb-10, 2017  
Date

## 1. INTRODUCTION

This industrial storm water pollution prevention plan (SWPPP) for Pacific Gas and Electric Company's (PG&E) Gateway Generating Station (facility) was prepared in accordance with the requirements of the California State Water Resources Control Board Industrial Storm Water Permit for Discharges Associated with Industrial Activity ("General Permit," Order NPDES No. CAS000001). A copy of the General Permit (Order No. 2014-0057-DWQ) dated April 1, 2014, is attached as Appendix A.

This SWPPP will be modified whenever there is a change in operation, maintenance or construction which may affect the discharge of pollutants to surface water. It will also be amended if it is found ineffective in achieving the stated objectives listed in the General Permit.

### 1.1 Background and Requirements

The Federal Clean Water Act (CWA) prohibits discharges from point sources to waters of the United States, unless the discharges are in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. In 1987, the CWA was amended to establish a framework for regulating municipal storm water discharges and discharges associated with industrial activity under the NPDES program. Industrial storm water discharges are regulated pursuant to CWA section 402(p)(3)(A). This provision requires NPDES permits for industrial storm water discharges to comply with technology-based effluent limitations and water quality-based limitations, as well as implement best management practices (BMPs).

On April 17, 1997, the California State Water Resources Control Board (SWRCB) issued NPDES General Permit for Industrial Storm Water Discharges, Excluding Construction Activities, Water Quality Order 97-03-DWQ (previous permit). The current General Permit, Order 2014-0057-DWQ, rescinds the previous permit and serves as the statewide general permit for industrial storm water discharges. The General Permit requires dischargers to:

- Eliminate unauthorized non-storm water discharges (NSWDs);
- Develop and implement SWPPPs that include BMPs;
- Implement minimum BMPs, and advanced BMPs as necessary, to achieve compliance with the effluent and receiving water limitations of this General Permit;
- Conduct monitoring, including visual observations and analytical storm water monitoring for indicator parameters;
- Compare monitoring results for monitored parameters to applicable numeric action levels (NALs) derived from the U.S. EPA 2008 Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity (2008 MSGP) and other industrial storm water discharge monitoring data collected in California;
- Perform the appropriate Exceedance Response Actions (ERAs) when there are exceedances of the NALs; and
- Certify and submit all permit-related compliance documents via the Storm Water Multiple Application and Report Tracking System (SMARTS). Dischargers shall certify and submit these documents which include, but are not limited to, Permit Registration Documents (PRDs) including Notices of Intent (NOIs), No Exposure Certifications (NECs), and SWPPPs, as well as Annual Reports, Notices of Termination (NOTs), Level 1 ERA Reports, and Level 2 ERA Technical Reports.

Copies of all PRDs are included in Appendix B.

## 1.2 SWPPP Performance Standards

This SWPPP identifies and evaluates all sources of pollutants from the facility that may affect the quality of industrial storm water discharges and authorized NSWDs. Additionally, this SWPPP identifies and describes the minimum BMPs and any advanced BMPs implemented to reduce or prevent pollutants in industrial storm water discharges and authorized NSWDs. BMPs will be selected to achieve compliance with this General Permit and will identify and describe conditions or circumstances which may require future revisions to be made to the SWPPP. A copy of the SWPPP shall be maintained at the facility.

## 1.3 SWPPP Implementation and Revisions

PG&E shall fully implement this SWPPP by July 1, 2015. The SWPPP shall be revised whenever necessary and will be certified and submitted electronically to the SWRCB via SMARTS within 30 days whenever the SWPPP contains significant revisions. Minor revisions are not required to be entered into SMARTS more than once every three months within a given reporting year. A log of all SWPPP revisions is included in Appendix C.

## 1.4 General Facility Information

Facility Name: Gateway Generating Station

Facility Address: 3225 Wilbur Avenue, Antioch CA 94509

Telephone Number: (925) 522-7838

Standard Industrial Classification (SIC) Code: 4911 (Electric Power Generating Facility)

Waste Discharge Identification (WDID) Number: 5S07I021950

Scheduled Facility Operating Hours: 24 hours/7 days (2 shifts)

Size of Facility: Approximately 32.5 acres

The facility is located in unincorporated Contra Costa County (within the City of Antioch's Sphere of Influence), on Wilbur Avenue, 1 mile northeast of Antioch, on the southern shore of the San Joaquin River (Figure 1). The operating portion of the site area is approximately 22 acres. The facility is a natural gas-fired, combined cycle, combustion turbine power plant with a nominal generation capacity of 530 megawatts. The facility includes the following building structures and areas:

- Two Combustion Turbine Electrical Generators;
- Steam Powered Electrical Generator;
- Wet Surface Air Cooler (Wet SAC);
- Fin Fan (Close-loop Cooling System);
- Air Cooled Condenser;
- Plant Services Building;
- Laydown Area for Equipment/Parts Staging;
- Warehouse;

- Hazardous Materials Storage Shed;
- Hazardous Waste Accumulation Storage Shed; AND
- Water Treatment Building.

Percent Impervious: ~28%

Facility Contact:

Name: Angel Espiritu  
 Title: Environmental Compliance Manager  
 Company: Pacific Gas and Electric Company  
 Phone: (925)522-7838  
 Email: ABE4@pge.com  
 Street Address: 3225 Wilbur Ave  
 City: Antioch  
 State: California  
 Zip Code: 94509

**1.5 Pollution Prevention Team**

PG&E has identified a Pollution Prevention Team responsible for assisting with the implementation of this SWPPP and for conducting all monitoring required under the General Permit. The specific individuals (and job title) that are responsible for developing, implementing, and revising this SWPPP and conducting monitoring are identified in the Table I.

**Table I Pollution Prevention Team**

<b>Name of Person</b>	<b>Title/Position</b>	<b>Responsibilities, Duties, and Activities</b>
Jeremy Laurin	Water Quality Subject Matter Expert	Supervise SWPPP development and implementation; provide support and training to the ECM and Plant Manager; review of any documents uploaded to SMARTS; interface with the Regional and/or State Water Quality Control Boards when necessary.
Angel Espiritu	Environmental Compliance Manager (ECM)	Facility lead for storm water permit compliance, monitoring, and reporting; conduct employee training; supervise and/or conduct inspections and sampling, record and report maintenance; record and report spills and leaks; file documents in SMARTS; BMP Implementation, emergency response coordinator, spill cleanup coordination.
<b>Name of Person</b>	<b>Title/Position</b>	<b>Responsibilities, Duties, and Activities</b>
Steve Royall	Director, Fossil Generation	Legally Responsible Party (LRP); responsible for certification of Notice of Intent (NOI) within SMARTS.
Tim Wisdom	Sr. Plant Manager	Duly Authorized Representative (DAR); responsible for certification of documents within SMARTS.
Aman Singh	Maintenance Supervisor	BMP Implementation and maintenance.
David J. Hammond	Operations Supervisor	BMP Implementation and maintenance.

David Thurston	Plant Engineer	Engineering guidance, supervision and review of BMPs.
Doug Welch or available on-shift Power Plant Technician	Plant Chemist or available on shift power plant technician	Storm water inspections and sampling.

In the event that the Environmental Compliance Manager or other positions responsible for SWPPP implementation are temporarily unavailable to conduct storm water activities due to vacation, illness, out of town business or other absences, backup personnel will implement the SWPPP and conduct required monitoring. PG&E will train all backup personnel so they are familiar with storm water requirements.

The Environmental Compliance Manager, through the Operations or Maintenance Supervisor, will notify the backup PPT member of any expected absences. If the backup PPT member is unavailable, a tertiary individual will be selected and trained to perform the tasks necessary during the primary and secondary PPT member's absence. The backup PPT member has been trained to complete Environment Compliance Manager's tasks when the ECM is unexpectedly absent.

PG&E will ensure that this SWPPP is implemented and revised as necessary to be consistent with applicable municipal, state, and federal requirements that pertain to the requirements in the General Permit.

## 2. SITE LAYOUT AND EXISTING FACILITY PLANS (PERMIT SECTION X.E)

PG&E has prepared three figures illustrating the information required by the General Permit. These include Figure 1 Site Location Map, Figure 2 Facility Details Map, and the Figure 3 Storm Water Flow and BMP Map. The maps present the following information where applicable:

- Site location;
- North arrow;
- Facility boundary;
- Drainage areas;
- Portions of any drainage area impacted by discharges from surrounding areas;
- Direction of flow within each drainage area;
- On-facility surface water bodies;
- Areas of soil erosion;
- Nearby water bodies (e.g., rivers, lakes, wetlands);
- Municipal storm drain inlets;
- Location of storm water collection and conveyance systems;
- Points of discharge;
- Sampling locations;
- Structural control measures;
- Impervious areas;
- Locations of directly exposed materials;
- Locations of significant spills and leaks;
- Areas of industrial activity;
- Industrial storage areas/storage tanks;
- Shipping and receiving areas;
- Fueling areas;
- Vehicle and equipment storage/maintenance areas;
- Material handling/processing areas;
- Waste treatment and disposal areas;
- Dust or particulate generating areas;
- Cleaning and material reuse areas; and
- Other areas of industrial activity.

Storm water in Drainage Area A is generally conveyed from the south to the north. Surface run-off travels to drain inlets and/or rock-lined ditches which connect to a covered drainage conveyance into a concrete structure with flow valves. The valves on the outlet structure are typically left open to allow the discharge of stormwater in the wet season. The valves are typically left closed in the dry season to

provide an additional measure to capture potential pollutants if a spill occurred. Stormwater in Drainage Area B is contained in a depression centrally located in the drainage area and does not discharge. Additionally, there is no industrial activity in Drainage Area B. The facility details are shown on Figure 2.

### 3. LIST OF INDUSTRIAL MATERIALS (PERMIT SECTION X.F)

#### 3.1 List of Industrial Materials Handled at the Facility

The following table lists the industrial materials stored or handled at the facility (as detailed in the Hazardous Materials Business Plan):

**Table II Industrial Materials Handled at the Facility**

Material	How Stored	Receiving/Shipping and Handling Frequency	Storage Location	Typical Quantities
Aqueous Ammonia (29%)	Aboveground Storage Tank (AST)	Weekly	Aqueous Ammonia Storage Area	18,000 gallons
Pre-blended Phosphate/Caustic (Soap)	Tote	Daily	Plant Services Building	460 gallons
Sodium Bisulfite	Tote	Monthly	Water Treatment Building	50 gallons
Stabilized Bromine/Sodium Hydroxide	Tote	Monthly	Water Treatment Building and Wet SAC	110 gallons
Sulfuric Acid	Tote	Semi-annual	Wet SAC	35 gallons
Corrosion/Scale Inhibitor/Sodium Hydroxide	Tote	Semi-annual	Wet SAC	110 gallons
Chlorine Scavenger	Tote	Monthly	Water Treatment Building	65 gallons
Mineral Oil	Transformers	As needed	Transformers (throughout the site) and the inlet chiller	58,000 gallons
Diesel Fuel No. 2	AST	Weekly	Water Treatment Building	500 gallons
Turbine Oil	Within Turbines / Drums	As needed	Combustion Turbines, Steam Turbine, Hazardous Materials / Waste Storage Shed	17,000 gallon

<b>Material</b>	<b>How Stored</b>	<b>Receiving/Shipping and Handling Frequency</b>	<b>Storage Location</b>	<b>Typical Quantities</b>
Mixed Oil	Drum	As needed	Hazardous Materials / Waste Storage Shed	55 gallon
Hydraulic Oil	Steam Turbine	As needed	Steam Turbine	130 gallons
Liquid Carbon Dioxide	Cylinder	As needed	Combustion Generators and CO2 Bulk Storage	36,000 gallons
Argon	Cylinder	As needed	Combustion Turbines	1,344 cubic feet
EPA Protocol Gases (Carbon Monoxide / Nitrogen / Oxygen / Nitric Oxide)	Cylinder	As needed	Combustion Turbines	4,896 cubic feet
Helium	Cylinder	As needed	Combustion Turbines and Gas Conditioning Station	2,200 cubic feet
Oxygen	Cylinder	As needed	Combustion Turbines	1,124 cubic feet
Hydrogen	Cylinder	As needed	Tube Trailer and Gas Conditioning Station	134,200 cubic feet
Nitrogen	Cylinder	As needed	Combustion Turbines, Steam Turbine, Inlet Chiller	8,735 cubic feet
Propane	Cylinder	As needed	Combustion Turbines and Plant Services Building	60 pounds
Acetylene	Cylinder	As needed	Plant Services Building	1,700 cubic feet
Petroleum Distillates	Within Transformer	As needed	Spare GSU Transformer	14,000 gallon
Refined Petroleum Oil	Drum	As needed	Spare GSU Transformer	55 gallons

<b>Material</b>	<b>How Stored</b>	<b>Receiving/Shipping and Handling Frequency</b>	<b>Storage Location</b>	<b>Typical Quantities</b>
Dielectric Fluid	Transformer housing	As needed	Plant Services Building Transformers, Water Treatment Building, Combustion Turbines, Main Electrical Control Enclosure and Inlet Chiller	4,800 gallons
Gear Lubricant	Gear Boxes (36) and Drums	As needed	Air Cooled Condenser Gear Boxes (36), Warehouse and Hazardous Materials / Waste Storage Shed	540 gallons
Lead Acid Batteries	Within Electrical Equipment	As needed	Combustion Turbines	48,000 pounds
Lead Calcium Batteries	Within Electrical Equipment	As needed	Switchyard	90 gallons
Sulfur Hexafluoride	Internally within breakers	As needed	Sulfur Hexafluoride Breakers	774 pounds
Carbon Dioxide, Gas	Cylinders	As needed	Stormwater Treatment System	6,620 cubic feet
HaloKlear BHR-50	Plastic Tote	As needed	Stormwater Treatment System	275 gallons
Yardney 3660 Media Filter (glass media beads)	Within Equipment	As needed	Stormwater Treatment System	6,300 pounds
Sodium Hydroxide	Plastic Container	As needed	Stormwater Treatment System	30 gallons
Non-hazardous trash	In enclosed dumpster	Daily	Laydown in roofed area	3 yards
Metal scraps for recycling	Roll-off bin with tarp cover	Weekly	Laydown area	20 yards

<b>Material</b>	<b>How Stored</b>	<b>Receiving/Shipping and Handling Frequency</b>	<b>Storage Location</b>	<b>Typical Quantities</b>
Wood Pallets	Outside	Daily	Laydown	50 to 100 total
Plastics	In enclosed dumpster	Daily	Laydown in roofed area	3 yards
Recyclables	In enclosed dumpster	Daily	Laydown in roofed area	3 yards
Cardboard	In enclosed cardboard compactor	Daily	Laydown in roofed area	3 yards
RCRA Waste (i.e., waste absorbent)	In secondary-contained drums within covered waste storage area	As needed	Hazardous Materials / Waste Storage Sheds	55 gallons
Non-RCRA Waste (i.e. oily debris)	In secondary-contained drums within covered waste storage area	As needed	Hazardous Materials / Waste Storage Sheds	55 gallons
Universal Waste (i.e., batteries and fluorescent light bulbs)	Bins	As needed	Hazardous Materials / Waste Storage Sheds	5 pounds
Monoethanolamine (30%-60%)	Tote	As needed	Northeast corner of Air Cooled Condenser (ACC)	400 gallons
Cooling Water Inhibitor (3DTRASAR)	Tote	As needed	Water Treatment Building	110 gallons
Antiscalant (Avista Vitec)	Drum	As needed	Water Treatment Building	60 gallons
Antifungal/bacteria/slime (Stabrex)	Tote	As needed	Water Treatment Building	110 gallons
Simple Green	2.5 gallon Containers	As needed	East of the Plant Services Building	10 gallons
Reclaimed water	Tanks	Daily	East of the Water Treatment Building	140,000 gallons
Wastewater	Tank	Daily	East of the Water Treatment Building	40,000 gallons

<b>Material</b>	<b>How Stored</b>	<b>Receiving/Shipping and Handling Frequency</b>	<b>Storage Location</b>	<b>Typical Quantities</b>
Turbine Cleaning Fluid	Tote	As needed	Parts and Miscellaneous Storage Building	250 gallons
Various solvents, degreasers, paints, adhesives, etc.	Fire Cabinet	As needed	East of the Plant Service Building	Typically less than 1 gallon each

#### **4. DESCRIPTION OF POTENTIAL POLLUTANT SOURCES (PERMIT SECTION X.F AND G)**

##### **4.1 Industrial Processes**

Gateway Generating Station facility manufactures electricity through the use of two natural gas fired combustion turbines and a steam powered generator. The industrial materials utilized throughout the facility are detailed in Table II. All industrial processes associated with manufacturing occur at locations denoted on Figure 2.

Industrial materials imported to the site are imported directly into the warehouse, directly to aqueous ammonia storage tank, the water treatment plant and the wet surface air cooler. Handling, shipping and receiving of hazardous materials including waste occurs at the frequencies denoted in Table II above. Storage areas identified in Table II are also denoted in Figure 2. These areas are further described as follows.

The aqueous ammonia is stored in an area that houses two 20,000 gallon capacity tanks. These tanks sit above grade within a secondary containment unit and a sump. This area has sufficient storage capacity to meet the facility's Risk Management Plan requirements. Storm water that collects in this sump is discharged to the sanitary sewer per a separate permit. This storage area has its own loading ramp that drains to the secondary containment sump below the tanks.

The hazardous materials storage shed, hazardous waste storage shed and hazardous materials accumulation shed are all covered sheds with secondary containment that meets the facilities hazardous materials business plan (HMBP) and SPCC plan requirements. The various oils the facility uses are stored within these sheds in 55 gallon drums. In addition to those drums universal waste and used absorbent is also stored within these sheds. Materials and wastes are moved using services vehicles.

All hazardous materials associated with the water treatment plant including the diesel fuel used for the emergency fire water system are housed in a roofed water treatment building. Secondary containment for these materials is provided. All of the ASTs within this area are filled by bulk delivery.

There are various transformers throughout the facility. These transformers are filled with dielectric oil and are housed in secondary containment that meets the facility's SPCC plan requirements.

Various hazardous materials are stored adjacent to the wet surface air cooler. These materials are all stored in sealed tanks within secondary containment. These tanks are filled by bulk delivery.

Trash, recyclable materials, and cardboard are accumulated in three separate dumpsters. The dumpsters have lids which are closed when the dumpsters are not actively used. To further isolate the dumpsters from exposure to storm water, they are housed under a roof.

Metals for recycling are accumulated in a roll off bin or bins and are covered when not actively in-use.

Various pressurized gases are stored throughout the facility for various uses. These pressurized gases are stored according to all applicable HMBP requirements.

Various batteries are stored throughout the facility for various uses. These batteries are stored in roofed buildings and according to all applicable HMBP requirements.

## 4.2 Material Receiving, Shipping, and Handling

### Receiving

The facility receives regular deliveries of the materials listed in Table II. The materials stored in larger tanks are delivered by service trucks and are directly loaded into the respective vessels. Receiving and loading of materials (e.g., fuels, fuel additives, oils, and ammonia) is performed at the respective material storage areas. Other sources include smaller quantities of oils used in transformers, sulfuric acid used in batteries, and oils used in miscellaneous equipment and machines which are delivered to their various storage locations throughout the facility, including but not limited to the warehouse, plant services building, parts and miscellaneous storage building, and the water treatment building.

### Material Handling

The primary function of the power plant facility is to generate electricity through a combined-cycle process utilizing natural gas as fuel. The potential pollutants at the facility are used in ancillary functions such as lubricants, aqueous ammonia for emissions control, and other various maintenance fluids. Most materials and wastes are transported via on-site pipe networks. For example, potable water is piped to the facility from a municipal water purveyor to the water treatment area and then transferred from the treatment plant to the boilers and other heat exchange equipment. Used water is conveyed to the sanitary sewer. Small quantities of other materials and wastes, typically for maintenance activities, are moved using services vehicles. There is a seldom used parts cleaning machine that is located outdoors, immediately east of the plant services building.

### Waste

General trash is accumulated in dumpsters located north of the inlet chiller. The waste dumpster area is equipped with a storm resistant shelter. Trash is transferred to a collection facility by a service vendor.

Metals for recycling are accumulated in two dumpsters that are equipped with lids. One metal disposal dumpster is located near the trash dumpsters and the other is located east of the parts and miscellaneous storage building. Occasionally, roll-off dumpsters are placed near the warehouse during maintenance and repair operations.

Hazardous waste is temporarily stored onsite in storage sheds located east of the plant service building and the south-east corner of the warehouse. The majority of hazardous waste produced at the facility is waste oil sludge and used lubricating oil. Hazardous waste is picked up by a waste disposal vendor as necessary, though typically picked up more frequently; the hazardous waste vendor is on 90-day maximum schedule. An industrial service vendor visits the site weekly to perform a required weekly inspection and schedule waste pick-up.

The water-side effluent from the oil/water separator is conveyed to the sanitary sewer along with other waste water generated from plant operation. The oily sludge effluent is transported offsite for proper disposal.

Portable toilets are commonly placed onsite in various locations for construction and maintenance projects and are serviced regularly by a service vendor.

### Shipping

The industrial product produced at the facility is electricity and therefore shipping of industrial products does not occur at this facility. The electricity generated at the facility is transmitted through the substation located west of the facility.

#### **4.3 Dust and Particle Generating Activities**

PG&E does not conduct any activities that generate dust and/or particles. The vents located on the combustion turbines are designed only for heat dissipation. The active areas of the site are paved or covered in gravel to prevent dusting.

#### **4.4 Significant Spills and Leaks**

Significant spills and leaks include any toxic chemicals identified in 40 Code of Federal Regulations (CFR) Section 302 that are discharged into the facilities' storm water conveyance system as reported on U.S. EPA Form R, as well as spills or leaks of oil and hazardous substances in excess of reportable quantities (40 CFR §§ 110, 117, and 302). PG&E contracts with a service vendor to respond to any significant spills of fuels, oil or other materials. During the routine monthly inspections, PG&E will evaluate the facility in areas where spills and leaks could potentially occur during material delivery, unloading, loading, transport, storage/containment, or use. There have not been any significant spills or leaks of industrial materials at this facility in the last five years that had potential to be discharged from the facility.

In accordance with the facility SPCC Plan and the General Permit, in the event that significant spills or leaks occur in the future, for each potential discharge PG&E will record and document the following information: the location, characteristics, and approximate quantity of the materials spilled or leaked; approximate quantity of the materials discharged from the facility's storm water conveyance system; the cleanup or remedial actions that have occurred or are planned; the approximate remaining quantity of materials that have the potential to be discharged; and the preventive measures taken to ensure spills or leaks of the material do not reoccur.

#### **4.5 Non-Storm Water Discharges**

A NSW is any water discharged at the Facility which is not the direct result of a rain event. Examples include process water, cooling water, wash water, and sanitary wastewater. Certain limited categories of NSWs are considered to be authorized by the General Permit (as long as they are not in violation of any Basin Plan, municipal agency ordinance, or other statewide water quality control plans or policy requirements), including: fire hydrant flushing; potable water sources; drinking fountain water; refrigeration, air conditioning, and compressor condensate; irrigation drainage and landscape watering; uncontaminated natural springs, groundwater, and foundation/footing drainage; seawater infiltration; and incidental windblown mist from cooling towers.

Authorized NSWs at the Gateway Generating Station facility are expected to be prevented or minimized and would occur at an unknown frequency if they arise with the exception of the fire system flushing. The fire system is flushed annually and the quantity of water would be equal to the amount in the system or necessary to flush the system. Expected authorized NSWs include:

- Fire system flushing water;
- Irrigation water;
- Eye wash system flushing and testing water; and
- Air conditioning or compressor condensate.

The NSWDs listed above are authorized by the General Permit if all of the following conditions are met:

- The NSWDs are in compliance with Regional Water Quality Control Board (RWQCB) requirements;
- The NSWDs are in compliance with local agency ordinances and/or requirements;
- BMPs are specifically included in the SWPPP to (1) prevent or reduce the contact of NSWDs with significant materials or equipment and (2) minimize, to the extent practicable, the flow or volume of NSWDs;
- The NSWDs do not contain significant quantities of pollutants;
- The monitoring program includes quarterly visual observations of each NSWD and its sources to ensure that BMPs are being implemented and are effective; and
- The NSWDs are reported and described annually as part of the Annual Report.

As part of the routine monthly site inspections, PG&E will conduct an evaluation of the facility to identify any NSWDs, sources, and drainage areas. The inspection will include an evaluation of all storm drain inlets to identify connections to the storm water conveyance system; and a description of any NSWDs and how any which have occurred and have been eliminated. In the event that NSWDs are discovered, they will be described on the inspection form located in Appendix E of the SWPPP. This description will include the source, quantity, frequency, and characteristics of the NSWDs, associated drainage area, and whether it is an authorized or unauthorized NSWD.

Potential unauthorized NSWDs at the Gateway Generating Station Facility include:

- Secondary containment failure;
- Pipeline leak, rupture, or failure;
- Contaminated water in sumps;
- Leaks or spills from portable restrooms; and
- Leaks or spills from service vehicles or portable equipment.

Unauthorized NSWDs have been eliminated or prevented through the use of sumps, secondary containment structures, an oil/water separator, drains that convey waste to the oil/water separator, controlled site access, and the placement and maintenance of numerous spill clean-up kits throughout the facility.

#### **4.6 Erodible Surfaces**

There are three vegetated areas (Figure 3) that may be considered erodible surfaces at the facility. The only unpaved areas within the active facility exposed to storm water are flat gravel-capped surfaces between structures and adjacent to roadways, and three vegetated surfaces on the northeastern edge of the property.

The southern portion of the facility is inactive and self-contained, with a berm which surrounds the entire perimeter. This area has also been graded into a depression and decompacted to help increase infiltration of any storm water that lands within the area.

## **5. ASSESSMENT OF POTENTIAL POLLUTANT SOURCES (PERMIT SECTION X.G.2)**

### **5.1 Narrative Assessment of Likely Pollutants Present in Storm Water Discharges**

PG&E conducts frequent preventive maintenance to ensure that plant machinery, equipment and storage vessels are in good working order. The most likely potential pollutants in storm water discharges are the materials listed in Table II. Approximately 28 storm water catch basins drain the site and are located throughout the facility and in proximity to material storage areas. PG&E has implemented BMPs to control the offsite migration of potential pollutants by following good housekeeping, requiring immediate cleanup of spills, and by installing filter screens (Dandy Pops®) in storm water catch basins on the site, as appropriate. The filter screens are cleaned and/or replaced as needed.

### **5.2 Identification of Additional BMPs**

In the event that conditions change or monitoring results indicate a need, PG&E will consider identifying additional BMPs to address the changed conditions or constituents of concern.

### **5.3 Identification of Drainage Areas with No Exposure**

There is one drainage area at the facility with no exposure, as indicated on Figure 2. The southern area meets the requirements for no exposure, as there are no industrial activities occurring within it.

### **5.4 Identification of Additional Parameters**

In addition to the standard parameters required for all industrial facilities (pH, oil & grease, and total suspended solids), PG&E will continue to analyze for total iron, as per the SIC code 4911 requirements of Table 1 and Attachment A of the General Permit.

The facility drains to the Delta Waterways (western portion) which is in the HUC 10 watershed of the site. The 303(d) listed impairments for the Delta include: Chlordane; Chlorpyrifos; Dichlorodiphenyltrichloroethane (DDT); Diazinon; Dieldrin; Dioxin; Dioxin compounds (including 2,3,7,8-TCDD); Disulfoton; Electrical Conductivity; Escherichia coli (E. coli); Furan Compounds; Group A Pesticides; Invasive Species; Mercury; Organic Enrichment/Low Dissolved Oxygen; Oxygen, Dissolved; Low Dissolved Oxygen; Pathogens; PCBs (Polychlorinated biphenyls) (dioxin-like); PCBs (Polychlorinated biphenyls); Selenium; and Unknown Toxicity. The sources of the impairments listed are primarily caused by agricultural sources or mineral resource extraction and the Gateway Generating Station does not have the potential to discharge most of the pollutants; however, electrical conductivity may be an exception.

Electrical Conductivity is a measure of the ability of water to pass an electrical current. Conductivity in water is affected by the presence of inorganic dissolved solids such as chloride, nitrate, sulfate, and phosphate anions (ions that carry a negative charge) or sodium, magnesium, calcium, iron, an aluminum cations (ions that carry a positive charge). Though the General Permit does not have a Numeric Action Level for electrical conductivity, the facility has the potential to discharge inorganic dissolved solids and analytical results may be beneficial as an indicator of other pollutant concerns; therefore, the facility will also collect and analyze samples for electrical conductance.

## 6. STORM WATER BEST MANAGEMENT PRACTICES (PERMIT SECTION X.H)

This section describes the BMPs implemented and maintained as a result of the activities assessment in Section 4. The current BMPs, when properly maintained, are effective for the operations at the facility. BMPs are divided into minimum and advanced measures.

### 6.1 Minimum BMPs (PERMIT SECTION X.H.1)

#### 6.1.1 Good Housekeeping

- **Monthly Visual Inspections.** Once per calendar month, PG&E inspects all outdoor areas associated with industrial activity, including storm water discharge locations, drainage areas, conveyance systems, waste handling/disposal areas, and perimeter areas impacted by off-facility materials or storm water run-on to determine housekeeping needs. Any identified debris, waste, spills, tracked materials, or leaked materials identified during the inspections are cleaned and disposed of properly.
- **Tracking Control.** Although there is low potential for tracking of sediment at the facility, paved surfaces are swept on a monthly basis. Additionally sweeping will occur as needed.
- **Dust Control.** PG&E's power generation process does not generate dust, and the surface of the site is either paved, has a gravel cap, or is vegetated. Therefore, there is no need to implement dust control at this facility.
- **Cleaning Areas Impacted by Rinse/Wash Waters.** No washing or rinsing of equipment is performed at the facility. Parts are washed within an enclosed parts washer, within the roofed Plant Services building.
- **Industrial Materials Storage Control.** The facility stores all materials and performs all activities that involve hazardous materials under roofed areas (buildings or storage containers), within secondary containment, or during dry weather, if possible.
- **Control of Non-Solid Industrial Materials/Wastes.** The facility contains all stored non-solid industrial materials or wastes (e.g., fuel, waste oil) that can be transported or dispersed by wind or contact with storm water. Spill kits are maintained appropriately and allow for immediate response to spills. In addition, all materials are stored within secondary containment to prevent any spilled or leaked material from being transported by storm water. Numerous secondary containment structures have been designed and constructed throughout the facility to contain spills, leaks, or ruptures from various tanks and oil filled equipment. The secondary containment structures have been designed per SPCC requirements to contain the capacity of either 100 percent of the largest tank or 10 percent of all tanks or containers stored within the containment. Additional material and waste control information is included in the facility's Spill Prevention Control and Countermeasure (SPCC) Plan.
- **Control of Rinse/Wash Water Disposal.** No washing or rinsing is performed at the facility. The facility prevents the disposal of any industrial materials into the storm water conveyance system by maintaining spill kits appropriately and immediately responding to spills.
- **Minimize Storm Water Discharges from Non-Industrial Areas.** A non-industrial area exists within the facility, as denoted on Figure 2. This area is self-contained, with a berm surrounding the entire perimeter of this portion. This area has also been graded into a

depression and decompacted to help increase infiltration of any storm water that lands within the area, as described in Section 4.5.

- **Minimize Authorized NSWs from Non-Industrial Areas.** A non-industrial area exists within the facility and no authorized NSWs occur from it.

### 6.1.2 Spill and Leak Spill and Leak Prevention

The facility implements the following preventative maintenance measures:

- PG&E has identified the following outdoor equipment at the Facility which may spill or leak pollutants, as follows:
  - Containment areas, tanks and containers storing hazardous materials or wastes
  - Oil-filled electrical equipment and oil-filled operating equipment in the Radiator Area, and Transformer Yard
  - Service vehicles (when transporting materials such as drums of waste oil)
- Monthly observations of containment areas, tanks, equipment and systems are conducted to detect leaks, or identify conditions that may result in the development of leaks.
- The facility maintains a schedule for conducting routine maintenance of identified equipment and systems. There is a daily inspection of all equipment at the facility, monthly preventative maintenance and periodic servicing. Daily inspections are informal visual inspections by operators, and are not documented. Service vehicles are not washed on site.
- The facility has defined procedures for prompt maintenance and repair of equipment, and maintenance of systems when conditions exist that may result in the development of spills or leaks.
- The facility utilizes forklifts and golf carts that are loaned to the facility from PG&E Fleet. Fleet vehicles are repaired and maintained by the Fleet group.
- The manufacturer of the power generation equipment requires maintenance of equipment after a specified number of operating hours and therefore the facility conducts two shut-downs per year to maintain the facility's power generation equipment.

### 6.1.3 Spill and Leak Response

PG&E has established the following protocols to respond to spills and leaks:

- The facility has developed procedures to minimize spills and leaks. The facility has a SPCC Plan that addresses storage of materials and wastes.
- The facility has established spill and leak response procedures to prevent industrial materials from discharging through the storm water conveyance system. Spilled or leaked industrial materials are cleaned up promptly and disposed of properly.
- The facility has identified and described all necessary and appropriate spill and leak response equipment, locations of spill and leak response equipment, and spill/leak response equipment maintenance procedures, in the facility's HMBP and SPCC plans. Spill kits are maintained throughout the facility and denoted in maps located in the facility's HMBP.

- The facility has designated and trained appropriate spill and leak response personnel, identified as the PPT in Table 1 above. Spill and leak response personnel are trained annually, at a minimum. Plant operations personnel are responsible for spill cleanup; an outside vendor is used to respond to significant spills. Spill response personnel receive OSHA hazard communication training and spill training consistent with the hazardous materials business plan and SPCC plan.
- Powered industrial truck maintenance shall be performed on tarps or other impervious materials to capture spills.

#### **6.1.4 Material Handling and Waste Management**

PG&E has a robust program for addressing material handling and waste management, as follows:

- The facility minimizes the handling of industrial materials or wastes that can be readily mobilized by contact with storm water during storm events through the use of awnings at loading docks.
- The facility appropriately contains stored non-solid industrial materials or wastes (e.g., lubricant oil) that can be transported or dispersed by the wind or contact with storm water by storing these materials in secondary containment with water tight lids.
- Industrial waste disposal containers (dumpsters and metal waste recycling bins) and industrial material storage containers that contain industrial materials are covered with lids or plastic tarps when not in use.
- Site run-on and storm water generated from within the facility is diverted away from material storage areas.
- Spills of industrial materials or wastes that occur during handling are cleaned up in accordance with the spill response procedures.
- Outdoor material or waste handling equipment or containers that can be contaminated by contact with industrial materials or wastes are inspected and cleaned, as appropriate.

#### **6.1.5 Erosion and Sediment Controls**

Erosion is not a significant issue at the site because approximately 28 percent is paved and the remainder is covered with a gravel cap or is vegetated (Figure 3). Therefore, erosion is not a problem at the site, and the facility does not implement erosion and sediment controls.

#### **6.1.6 Employee Training Program**

PG&E employees responsible for implementing the storm water program at the Facility will receive annual storm water training. The facility has identified which personnel require training (per Section 1.5), their responsibilities, and the type of training they will receive, and will prepare or acquire appropriate training materials and establish a schedule for providing the training. All participants will sign a Training Log that will be kept in Appendix D. This documentation will be maintained with the SWPPP. Annual training is required once every calendar year. At a minimum, training will cover the following topics:

- BMP implementation;
- BMP effectiveness evaluations;
- Visual observations; and

- Monitoring activities.

In the event the Facility enters Level 1 status (see Section 9), appropriate team members will be trained by a Qualified Industrial SWPPP Practitioner (QISP). A QISP must complete a SWRCB-approved training course and assist in the preparation of ERAs for Level 1 and 2 status designations which are described in further detail in Section 9 of this SWPPP.

### **6.1.7 Quality Assurance and Record-Keeping**

PG&E has done [and will continue to perform] the following to retain proper quality assurance and record-keeping:

- The facility has developed and implemented management procedures to ensure that appropriate staff implements all elements of the SWPPP, including the Monitoring Implementation Plan;
- The facility has developed a method of tracking and recording the implementation of BMPs identified in the SWPPP, through the monthly inspection process; and
- The facility will maintain the BMP implementation records, training records and records related to any spills and clean-up related response activities for a minimum of five years.

## **6.2 Advanced BMPs (Permit Section X.H.2)**

In addition to the minimum BMPs described above in Section 6.1 and in Section X.H.1 of the General Permit, the facility will, to the extent feasible, implement and maintain any advanced BMPs necessary to reduce or prevent discharges of pollutants in its storm water discharge in a manner that reflects best industry practice considering technological availability and economic practicability and achievability.

### **6.2.1 Exposure Minimization BMPs**

The facility has installed permanent storm resistant shelters to prevent contact of storm water with certain kinds of materials. These areas include the hazardous materials/waste storage sheds, and the Laydown area (e.g., for waste and recycling dumpsters).

### **6.2.2 Storm Water Containment and Discharge Reduction BMPs**

These BMPs include structures that divert, infiltrate, reuse, contain, retain, or reduce the volume of storm water runoff. As described in Section 4.5, the facility includes gravel caps to areas that haven't been paved or are not roofed which may increase infiltration at the site and prevent erosion. Additional BMPs will be explored and implemented as needed.

### **6.2.3 Treatment Control BMPs**

- **Oil/Water Separator.** The site is equipped with an oil/water separator; however, since the effluent from the oil/water separator is conveyed to the municipal sanitary sewer (which is permitted through the publicly owned treatment works), this water is not considered storm water discharge. The oil (if any) is separated and sent offsite for proper disposal. The coalescer packs are inspected regularly and cleaned if indicated by inspection.

- **Parts Cleaner.** The site is equipped with a parts cleaner that is located outdoors on the east side of the maintenance shop. The manufacturer inspects the washer and replaces the solvent as necessary.
- **Drain Inlet Filters.** Filter screens (Dandy Pops®) are installed in storm water catch basins on the site, as appropriate, to capture sediment. The filter screens are cleaned and/or replaced as needed.
- **Stormwater Chemical Treatment/Filtration System.** The site is equipped with a standard chemical treatment and filtration system for the stormwater prior to discharge. The treatment system is located immediately adjacent to the existing outfall, E-006, to allow treatment of all of Gateway Generating Station's stormwater prior to discharge into the river. The system is expected to reduce the total iron content of the storm water effluent to less than or equal to 1 ppm.

Design of the system was precluded by volume-based calculations to meet the provisions of the IGP (see memo dated October 12, 2016 found in Appendix H). The volume of runoff produced from an 85th percentile 24-hour storm event and 85th Percentile Hourly Rainfall Intensity per the IGP, as determined from local, historical rainfall records produces a maximum of 229,562 gallons. The design volume processing rate of the treatment system is 468,895 gallons, both meeting and exceeding the volume-based calculations of the IGP.

Treatment steps for the treatment system are as follows:

1. The storm water is pH adjusted to allow the iron to precipitate out of the stormwater,
2. A chemical flocculating agent is added to clump the iron particles together,
3. The stormwater is settled and pumped over a series of small weirs to capture the solids,
4. Stormwater is then passed through the media filters for finer particulate removal,
5. The water is monitored real-time to assure it meets discharge criteria, if it does not meet pH or turbidity criteria, it is recirculated, and,
6. The treated stormwater is discharged into the San Joaquin River.

#### 6.2.4 Other Advanced BMPs

At this time, the Facility does not implement other advanced BMPs. In the event that conditions change or monitoring results indicate a need, PG&E will consider additional advanced BMPs to address the changed conditions or constituents of concern.

**7. TEMPORARY SUSPENSION OF ACTIVITIES (PERMIT SECTION X.H.3)**

PG&E's Gateway Generating Station operates two shifts, seven days a week. The facility does not have any plans to suspend industrial activities for ten or more consecutive calendar days in any given year. Therefore, this section of the General Permit is not applicable.

## 8. BMP SUMMARY (PERMIT SECTIONS X.H.4 AND 5)

The following table summarizes each identified area of industrial activity, the associated industrial pollutant sources, the industrial pollutants, and the BMPs implemented. The approximate boundaries of Drainage Areas A and B are shown on Figure 2. The PPT identified in Section 1.5 is responsible for implementing all BMPs at the site. Some of the BMPs described below require the use of mechanical equipment, such as forklifts, in order to perform maintenance activities on the BMPs. PPT members are authorized to use the required equipment or to obtain the help of other facility staff to maintain the BMPs onsite. The facility mechanics are responsible for maintaining the mechanical equipment throughout the facility.

To retain effectiveness during and after significant weather conditions, certain BMPs need to be inspected more frequently than monthly. These BMPs will be informally inspected by PPT members during large rain events or following rain events.

**Table III BMP Summary**

<b>Drainage Area</b>	<b>BMPs Implemented</b>	<b>Associated Industrial Pollutant Sources</b>	<b>Potential Industrial Pollutants</b>	<b>Frequency of BMP Implementation</b>
Combustion turbines	Spill kit	Oil Filled Equipment (Transformers)	Petroleum hydrocarbons, heavy metals	As needed
	Secondary containment	Aqueous Ammonia for exhaust system	Aqueous Ammonia	As needed
	Check dams	All facility pollutants	Suspended Sediment	As needed
Oil and Universal Waste Storage Used Oil / Hazardous Waste Storage	Spill kits	Truck access	Petroleum hydrocarbons, heavy metals	As needed
	Parts Cleaner	Part Cleaning	Solvents, lubricants, metals	As needed
	Spill kits and secondary containment	Spills during shipping and receiving	Petroleum hydrocarbons, heavy metals	As needed
	Covered forklift parking	Forklift	Vehicle related pollutants	Daily
Water Treatment Plant	Spill kit	Truck access	Petroleum hydrocarbons, heavy metals	As needed
	Spill kits and secondary containment	Spills during shipping and receiving	Diesel, various chemicals	As needed
	Fueling Sump	Fuel	Petroleum	Permanent
Trash and Scrap Metal Dumpsters	Dumpsters have lids, roll offs are tarped	Spills during shipping and receiving	Metals and non-petroleum waste	Cover daily when not in use
	Storm resistant shelter	Waste	Metals, oils, suspended solids	Permanent

Warehouse	Run-on diversions	Run-on from neighboring facilities	Iron	Permanent
Discharge Location	Valves and Concrete Containment	All facility pollutants	All potential pollutants	Permanent
	Treatment and filtration			As needed
All Drainage Areas	Drain inlet filters	All pollutant sources	All potential pollutants	Permanent
	Rock-lined ditches	All pollutant sources	Suspended solids	Permanent
	Site has access control and security 24 hours a day, 7 days a week	All pollutant sources	All potential pollutants	As needed
	Oil/Water Separator	All pollutants	Oils and Grease	Daily
	Oil absorbent socks around various drain inlets	All pollutant sources	Oils and Grease	Daily
	Powder coated drain inlet grates	Rusting grates	Iron	Permanent
	“No Dumping, Drains to Delta Signs”	Illicit dumping	All potential pollutants	Permanent

## 9. MONITORING IMPLEMENTATION PLAN (PERMIT SECTION X.I)

As described above in Section 1.5, PG&E has assembled a PPT that includes members assigned to conduct storm water monitoring. The facility has one industrial discharge location which is also the sampling location. The discharge location (Sample Location E-006) is located at the northern perimeter of the facility. Analytical monitoring and visual observations will be conducted at the sampling location shown on Figure 2.

### Procedures for Monthly Visual Observations

PG&E will conduct visual observations within the drainage area at the facility at least once per calendar month, which will include an evaluation of:

- Presence or indications of prior, current, or potential unauthorized NSWDS and their sources;
- Authorized NSWDS, sources, and associated BMPs; and
- Outdoor industrial equipment and storage areas, outdoor industrial activities areas, BMPs, and all other potential source of industrial pollutants.

Monthly visual observations will be conducted during daylight hours of scheduled facility operating hours and on days without precipitation. Visual observations will be recorded on the form provided in Appendix E. Information to be recorded will include the date, approximate time, locations observed, presence and probable source of any observed pollutants, name of person(s) that conducted the observations, and any response actions and/or additional SWPPP revisions necessary in response to the visual observations. To ensure adequate documentation of response action completion, a PPT member will initial and date the documented response action when the action is complete. If a monthly visual observation is not conducted, PG&E will provide an explanation in the Annual Report.

### Procedures for Sampling Event Visual Observations

PG&E will conduct visual observations at the same time sampling occurs at a discharge location. At each discharge location where a sample is obtained, PG&E will observe the discharge of storm water associated with industrial activity and record these observations on the form provided in Appendix E. The same types of information will be recorded as for the monthly inspections. The following items will be observed and recorded:

- The appearance of storm water discharged from containment sources (e.g., secondary containment or sumps) at the time that the discharge is sampled;
- The presence or absence of floating and suspended materials, oil and grease, discolorations, turbidity, odors, trash/debris, and source(s) of any discharged pollutants.

In the event that a discharge location is not visually observed during a sampling event, PG&E will record which discharge locations were not observed during sampling or that there was no discharge from the discharge location and will provide an explanation in the Annual Report for uncompleted sampling event visual observations. PG&E will revise BMPs as necessary if the visual observations indicate pollutant sources have not been adequately addressed in the SWPPP. If any response actions are noted during Sampling Event Visual Observations, a PPT member will initial and date the documented response action when the action is complete.

## Sampling and Analysis

Samples will be collected during Qualifying Storm Events (QSE). A QSE is defined as a precipitation event that produces a discharge for at least one drainage area and is preceded by 48 hours with no discharge from any Facility drainage area. PG&E will collect and analyze storm water samples from two QSEs within the first half of each reporting year (July 1 to December 31), and two QSEs within the second half of each reporting year (January 1 to June 30). Samples will be collected within four hours of the start of discharge at the E006 discharge/sampling location shown on Figure 2. The sampling point at E006 is upstream from the actual discharge into the San Joaquin River (Outfall), due to the comingling of our discharge with the neighboring industrial facility just after E006 and prior to Outfall.

Sampling will be performed in accordance with requirements of the General Permit. Use caution when collecting samples at night and do not collect samples without sufficient lighting. Samples will be collected and analyzed for pH, oil and grease, total suspended solids, and total iron (based on the facility's SIC code listed in Table 1 of the General Permit for additional analytical parameters). Sampling results will be compared to two types of NAL values based on the specific parameter to determine whether either type of NAL has been exceeded for each applicable parameter. Annual NAL exceedances are based on analytical results for the entire facility for the reporting year, while Instantaneous NAL exceedances are based on analytical results from each distinct sample. The table below describes test methods, reporting units, and NAL values:

**Table IV NAL Values**

<b>Parameter</b>	<b>Test Method</b>	<b>Reporting Units</b>	<b>Annual NAL</b>	<b>Instantaneous Maximum NAL</b>
pH	Portable instrument*	pH units	N/A	<6.0 or >9.0
Oil and Grease	EPA 1664A	mg/L	15	25
Total Suspended Solids	SM 2540-D	mg/L	100	400
Total Iron	EPA 200.7	mg/L	1.0	--
Electrical Conductivity			N/A	N/A

\*The pH screen will be performed as soon as practicable, but no later than 15 minutes after the sample is collected and will be analyzed using a calibrated portable instrument for pH.

All instruments used for pH measurement will be properly calibrated in accordance with the manufacturer's instructions and recommended frequency, and copies of the calibration records will be maintained onsite. Samples for total iron, total suspended solids, oil and grease, and electrical conductivity will be analyzed by an analytical laboratory that is Environmental Laboratory Accreditation Program (ELAP)-certified. All samples will be collected in accordance with Attachment H of the General Permit ("Sample Collection and Handling Instructions") and handled under proper Chain-of-Custody (COC) protocols. General Permit Attachment H and an example COC are included in Appendix F.

Though there are Effluent Limitation Guidelines (ELGs) for Electric Power Generation facilities, which require copper and chlorine analysis, the regulation only applies to runoff from coal storage piles and therefore the ELGs for Electric Power Generation do not apply to this facility because coal is not stored or used at the facility.

## Exceedance Response Actions

ERAs are required when an NAL exceedance occurs for any parameter. At the beginning of NOI coverage, PG&E will enter as a Baseline status for all parameters designated in Table IV above. If sampling results indicate an NAL exceedance [either annual or instantaneous] for any parameter listed in Table IV, the status will move up to Level 1 for that parameter on July 1<sup>st</sup> following the reporting year during which the exceedance occurred (i.e., if there was an instantaneous exceedance on September 30, 2015, Level 1 would begin on July 1, 2016). Moving to Level 1 status triggers two actions: a Level 1 ERA Evaluation and a Level 1 ERA Report, both prepared with assistance of a QISP.

- A Level 1 ERA Evaluation, due by October 1 following commencement of Level 1 status, consists of completing an evaluation of the industrial pollutant sources at the facility that may be related to the NAL exceedance and evaluate all BMPs to determine if revisions are necessary to prevent future NAL exceedances.
- A Level 1 ERA Report, due by January 1 following commencement of Level 1 status, is prepared after the Level 1 ERA Evaluation and consists of revising the SWPPP as necessary to implement any additional BMPs identified in the Evaluation and submitting via SMARTS the Level 1 ERA Report with details regarding SWPPP revisions and the results of the Evaluation.

A Level 1 status for any exceeded parameter will return to Baseline status once the Level 1 ERA Report has been completed, additional BMPs have been implemented, and results from four consecutive QSEs indicate no additional NAL exceedances for that parameter.

The status for any exceeded parameter will change to Level 2 if sampling results indicate an NAL exceedance for that same parameter while in Level 1 (i.e., if Level 1 was implemented on July 1, 2015 and an exceedance occurred on December 1, 2015, Level 2 would be triggered on July 1, 2016). Moving to Level 2 status triggers two actions: a Level 2 ERA Action Plan and a Level 2 ERA Technical Report, both prepared with assistance of a QISP.

- A Level 2 ERA Action Plan, due by January 1 following the reporting year during which the NAL exceedance occurred, consists of a schedule and description of implementing a particular demonstration, as described in the Level 2 Technical Report, in response to the NAL exceedance.
- A Level 2 ERA Technical Report, due by January 1 of the reporting year following the submittal of the Level 2 ERA Action Plan, describes one or more of the demonstrations in response to the NAL exceedance: Industrial Activity BMPs Demonstration, Non-Industrial Pollutant Source Demonstration, and/or Natural Background Pollutant Source Demonstration (as described in the General Permit Section XII.D.2).
- A Level 2 ERA Technical Report may be prepared and submitted at any time, whether or not the Facility is required to submit such a report.

A new Level 2 NAL exceedance is any Level 2 NAL exceedance for 1) a new parameter in any drainage area, or 2) the same parameter that is being addressed in an existing Level 2 ERA Action Plan in a different drainage area.

NAL exceedances, in and of themselves, are not violations of the General Permit. Failure to comply with the Level 1 status and/or Level 2 status ERA requirements is in violation of the General Permit.

**PG&E Gateway Generation Station ERA Status**

<i>Reporting Year</i>	<i>ERA Level Status</i>	<i>Parameter</i>	<i>Level 1 ERA Evaluation Completion Date</i>	<i>Level 1 ERA Report Submittal Date</i>	<i>Level 2 ERA Action Plan Submittal Date</i>	<i>Level 2 ERA Technical Report Submittal Date</i>

2015-2016	Baseline	N/A	N/A	N/A	N/A	N/A
2016-2017	Level 1	Iron, Total	09/27/2016	12/30/2016	N/A	N/A

See Appendix H for the ERA Evaluation(s) and Report(s)

### Reporting

PG&E will submit all sampling and analytical results via SMARTS within 30 days of obtaining all results for each sampling event. In the event a sample's analytical result is reported by the laboratory as non-detect or less than the method detection limit, the method detection limit will be provided. A value of zero will not be reported.

PG&E will provide the sample analytical results reported by the laboratory as below the minimum level (often referred to as the reporting limit) but above the method detection limit. Reported analytical results from multiple discharge points will be averaged automatically by SMARTS. For any calculations required by this General Permit, SMARTS will assign a value of zero for all results less than the minimum level as reported by the laboratory.

## **10. ANNUAL REPORTING (PERMIT SECTIONS XV AND XVI)**

PG&E will conduct an Annual Comprehensive Facility Compliance Evaluation (Annual Evaluation) each reporting year (July 1 to June 30). If the Annual Evaluation is conducted fewer than eight months, or more than sixteen months, after the previous Annual Evaluation, the facility will document the justification for doing so. Within 90 days of the Annual Evaluation, PG&E will revise the SWPPP, as appropriate, and implement the revisions. At a minimum, the Annual Evaluation will cover the following:

- Review of all sampling, visual observation, and inspection records conducted during the previous reporting year;
- Inspection of all areas of industrial activity and associated potential pollutant sources for evidence of, or the potential for, pollutants entering the storm water conveyance system;
- Inspection of all drainage areas previously identified as having no exposure to industrial activities and materials in accordance with the definitions in Section XVII;
- Inspection of equipment needed to implement the BMPs;
- Inspection of all site BMPs;
- Review and effectiveness assessment of all BMPs for each area of industrial activity and associated potential pollutant sources to determine if the BMPs are properly designed, implemented, and are effective in reducing and preventing pollutants in industrial storm water discharges and authorized NSWDS; and
- Assessment of any other factors needed to comply with the requirements in Section XVI.B.

Information gathered during the Annual Evaluation will be recorded on the form provided in Appendix E.

### Annual Report

PG&E will certify and submit via SMARTS an Annual Report no later than July 15<sup>th</sup> following each year. The Annual Report will be created by the Environmental Compliance Manager, reviewed by the Subject Matter Expert, and certified by the Legally Responsible Party. The Annual Report will include the following:

- A Compliance Checklist that indicates compliance with all applicable requirements of the General Permit;
- An explanation for any non-compliance of requirements within the reporting year;
- Identification of all revisions made to the SWPPP within the reporting year; and
- The date of the Annual Evaluation.

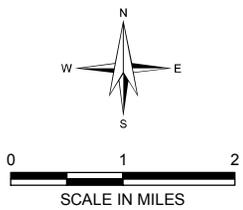
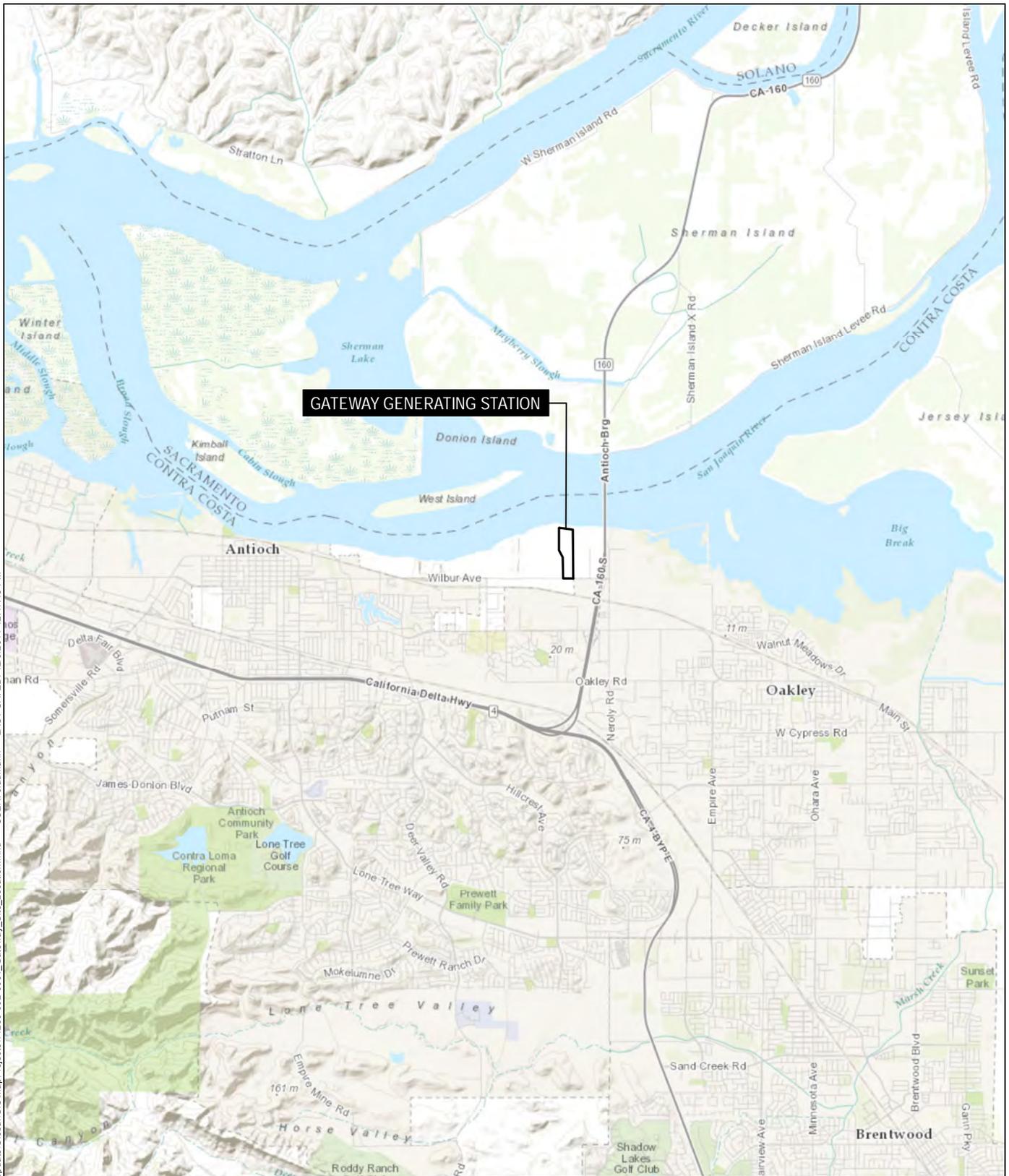
Copies of the Annual Report are included in Appendix G.

## REFERENCES

1. California State Water Resources Control Board. Industrial Storm Water Permit for Discharges Associated with Industrial Activity (Order No. 2014-0057-DWQ). 2014.
2. Excerpts from Gateway Generating Facility Hazardous Materials Business Plan.
3. Spill Prevention, Control, and Countermeasures Plan for Gateway Generating Station, initially prepared by CH2MHill January 12, 2009 and revised August 2, 2013.

## **FIGURES**

GIS FILE PATH: G:\141230\_PGE\_IGP\_SWPPP\_Update\Global\GIS\MapProjects\1230-002-0001\_Gateway\_Site\_Location.mxd — USER: craumann — LAST SAVED: 12/3/2014 12:47:48 PM



BASE-MAP SOURCE: ESRI

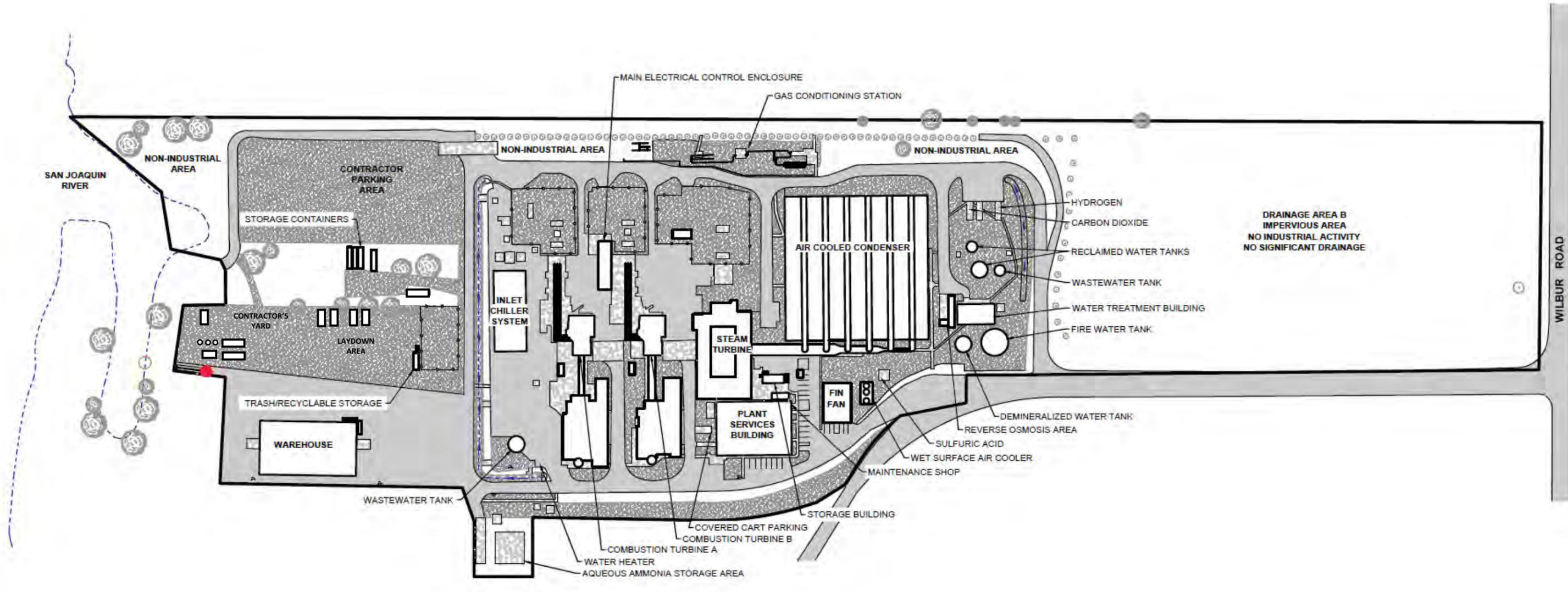


PACIFIC GAS AND ELECTRIC COMPANY  
 GATEWAY GENERATING STATION  
 ANTIOCH, CALIFORNIA

### SITE LOCATION

DECEMBER 2014

FIGURE 1

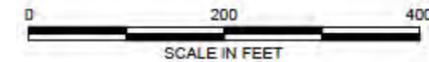
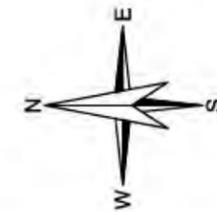


**LEGEND**

- STORM WATER DISCHARGE/SAMPLING POINT
- FACILITY BOUNDARY
- CO-MINGLED OUTFALL POINT
- ASPHALT CONCRETE
- CONCRETE
- GRAVEL
- TREE/VEGETATION

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.

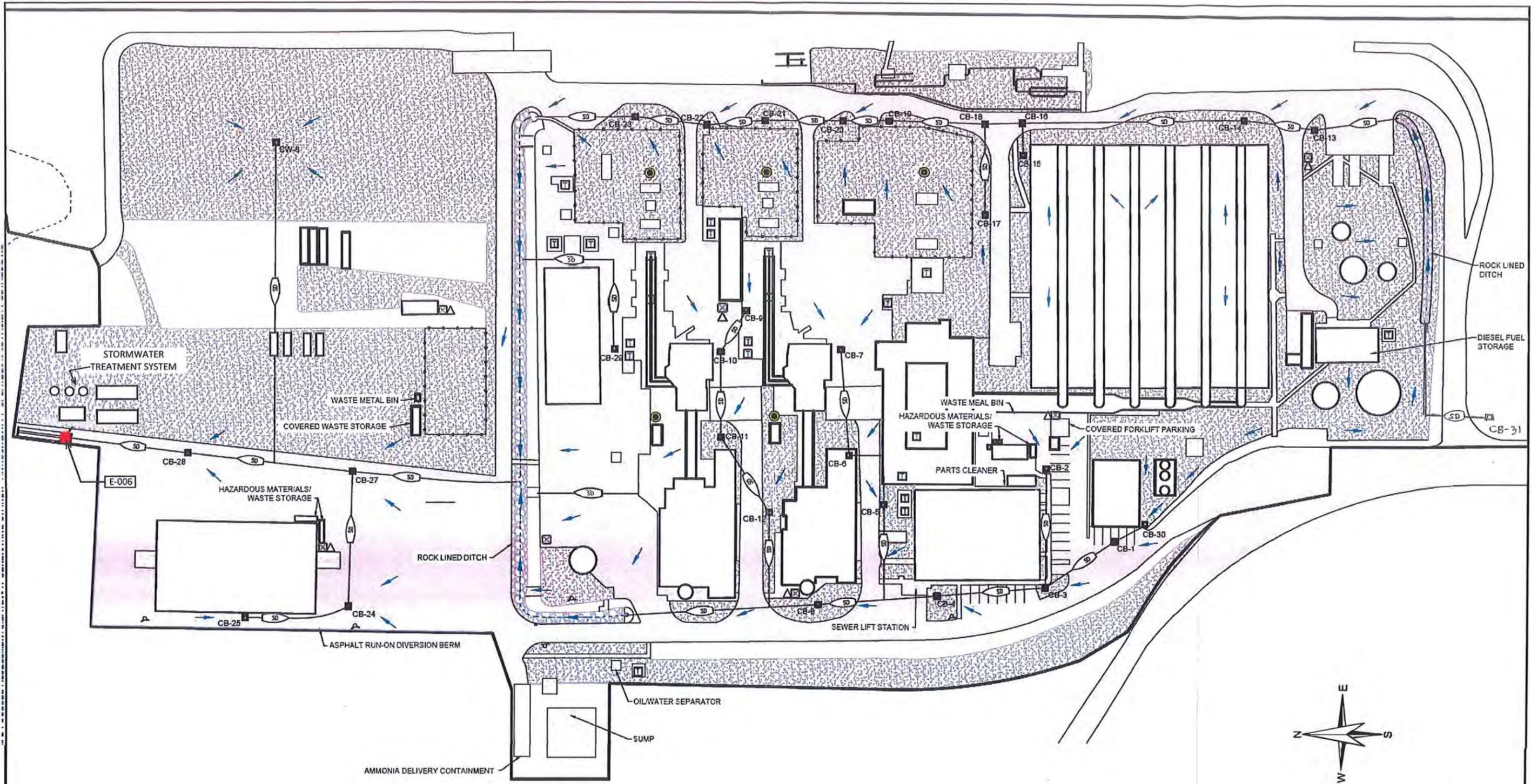


**PACIFIC GAS AND ELECTRIC COMPANY (PG&E)**  
 GATEWAY GENERATING STATION  
 ANTIOCH, CALIFORNIA

**FACILITY DETAILS**

SCALE: AS SHOWN  
FEBRUARY 2017

FIGURE 2

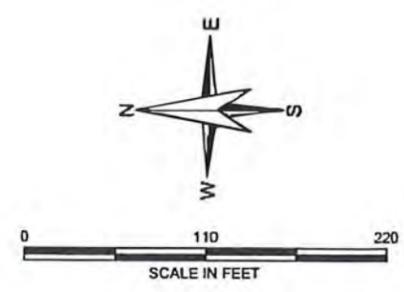


**LEGEND**

- |   |                                      |   |                  |
|---|--------------------------------------|---|------------------|
| ■ | DRAIN INLET WITH SEDIMENT FILTER     | □ | TRANSFORMER      |
| ● | STORM WATER DISCHARGE/SAMPLING POINT | ▭ | ASPHALT CONCRETE |
| — | FACILITY BOUNDARY                    | ▭ | CONCRETE         |
| ⊠ | PORTABLE RESTROOM                    | ▨ | GRAVEL           |
| △ | HANDWASH STATION                     |   |                  |
| ⊙ | SULFUR HEXAFLUORIDE BREAKER          |   |                  |

**NOTES**

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. AREA SHOWN IS DRAINAGE AREA A WHICH DRAINS TO E006




**PACIFIC GAS AND ELECTRIC COMPANY (PG&E)**  
 GATEWAY GENERATING STATION  
 ANTIOCH, CALIFORNIA

**STORM WATER FLOW AND BMPs**

SCALE: AS SHOWN  
OCTOBER 2018

**FIGURE 3**

**APPENDIX A**

**General Permit for Storm Water Discharges Associated with Industrial Activities  
(State Water Resources Control Board Order 2014-0057-DWQ)**

**APPENDIX B**

**Permit Registration Documents**



State Water Resources Control Board  
**NOTICE OF INTENT**

GENERAL PERMIT TO DISCHARGE STORM WATER  
ASSOCIATED WITH INDUSTRIAL ACTIVITY (WQ ORDER No. 2014-0057-DWQ)  
(Excluding Construction Activities)



GAVIN NEWSOM  
GOVERNOR



JARED BLUMENFELD  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

WDID: 5S071021950

Status: Active

**Operator Information**

Type: Private Business

Name: Pacific Gas Electric Company

Contact Name: Tim Wisdom

Address: PO Box 770000

Title: Plant Manager

Address 2: \_\_\_\_\_

Phone Number: 925-522-7812

City/State/Zip: San Francisco CA 94177

Email Address: T1WY@pge.com

Federal Tax ID: \_\_\_\_\_

**Facility Information**

Level: \_\_\_\_\_

Contact Name: Angel Espiritu

Title: Environmental Compliance Manager

Site Name: Gateway Generating Station

Address: 3225 Wilbur Ave

City/State/Zip: Antioch CA 94509

Site Phone #: 925-522-7838

County: Contra Costa

Email Address: abe4@PGE.com

Latitude: 38.01228 Longitude: -121.75859

Site Size: 32.5 Acres

Industrial Area Exposed to Storm Water: 22 Acres

Percent of Site Impervious (Including Rooftops): 28 %

**SIC Code Information**

1. 4911 Electric Services

2. \_\_\_\_\_

3. \_\_\_\_\_

**Additional Information**

Receiving Water: San Joaquin River Flow: Indirectly

Storm Drain System: \_\_\_\_\_

Compliance Group: \_\_\_\_\_

RWQCB Jurisdiction: Region 5S - Sacramento

Phone: 916-464-3291

Email: r5s\_stormwater@waterboards.ca.gov

**Certification**

Name: stephen royall

Date: June 14, 2017

Title: Senior Plant Manager



State Water Resources Control Board  
**NOTICE OF INTENT**

GENERAL PERMIT TO DISCHARGE STORM WATER  
ASSOCIATED WITH INDUSTRIAL ACTIVITIES (WQ ORDER No. 2014-0057-DWQ)  
(Excluding Construction Activities)



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

WDID: 5S07I021950

Status: Active

**Operator Information**

Type: Private Business

Name: Pacific Gas Electric Company

Contact Name: Benjamin Stanley

Address: PO Box 770000

Title: Senior Plant Manager

Address 2:

Phone #: 925-522-7812

City/State/Zip: San Francisco CA 94177

Email: BESN@pge.com

Federal Tax ID: 94-0742640

**Facility Information**

Level:

Site Name: Gateway Generating Station

Contact Name: Angel Espiritu

Address: 3225 Wilbur Ave

Title: Environmental Compliance Manag

City/State/Zip: Antioch CA 94509

Site Phone #: 925-522-7838

County: Contra Costa

Email: ABE4@PGE.com

Latitude: 38.01228

Longitude: -121.75859

Emergency:

Total Site Size: 32.5 Acres

Percent of Site Impervious (including rooftops): 28 %

Industrial Area exposed to Storm Water: 22 Acres

**SIC Code(s)**

Primary SIC: 4911 Electric Services

Secondary SIC:

Tertiary SIC:

**Additional Information**

Receiving Water: San Joaquin River

Water Flow: Indirectly

Storm drain system:

Compliance Group:

RWQCB Jurisdiction: Region 5S - Sacramento

Phone: 916-464-3291

Email: r5s\_stormwater@waterboards.ca.gov

**Certification**

Name Benjamin Stanley

Date: June 03, 2015

Title: Senior Plant Manager

**Attachments Meta Data Information:**

<b>Attachment ID</b>	<b>File Name</b>	<b>File Description</b>	<b>File Hash</b>	<b>File Size</b>	<b>Date Attached</b>	<b>Attachment Type</b>
1393445	14-15 AR & Recert Reminder Letter	14-15 AR & Recert Reminder Letter	e4101d3683ba9ccd e463ee75ce71789 3ca19ad7dfa27b69 cde4b24692d959	199940	2015-05-04 07:10:34.0	Other

**APPENDIX C**

**SWPPP Amendment Form**



**APPENDIX D**

**Training Log, including training material**



**APPENDIX E**

**Industrial Storm Water Facility Inspection and Visual Observation Form  
Annual Evaluation Form  
Sampling Log**



**BMP Control Measures**

- Number the structural storm water control measures identified in your SWPPP below (add as many control measures as are implemented on-site).
- Describe corrective actions initiated, date completed, and note the person that completed the work.

	<b>Structural Control Measure</b>	<b>Control Measure is Operating Effectively?</b>	<b>If No, In Need of Maintenance, Repair, or Replacement?</b>	<b>Corrective Action Needed and Notes</b> (identify needed maintenance and repairs, or any failed control measures that need replacement)	<b>Date Corrective Action Completed</b>	<b>Initials of Person Responsible for the Correction Action</b>
1	<b>Drain Inlets</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement			
2	<b>Secondary Containment: Transformers</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement			
3	<b>Secondary Containment: Turbines/Oil-filled Equipment</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement			
4	<b>Secondary Containment: Firewater Pump Bldg</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement			
5	<b>Secondary Containment: Hazardous Material/Waste Sheds</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement			
6	<b>Trash/Scrap Dumpsters</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement			
7	<b>Oil/Used Oil Storage</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement			
8	<b>Ditches/Outfall</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement			
9	<b>Iron Treatment System</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement			
10		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement			

**Areas of Industrial Materials or Activities exposed to storm water**

*Below is a list of areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility.*

	<b>Area/Activity</b>	<b>Inspected?</b>	<b>Controls Adequate (appropriate, effective, and operating)?</b>	<b>Corrective Action Needed and Notes</b>	<b>Date Corrective Action Completed</b>	<b>Initials of Person Responsible for the Correction Action</b>
1	<b>Material loading/unloading and storage areas</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No			
2	<b>Equipment operations and maintenance areas</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No			
3	<b>Fueling areas</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No			
4	<b>Outdoor vehicle and equipment washing areas</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No			
5	<b>Waste handling and disposal areas</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No			
6	<b>Erodible areas/construction</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No			
7	<b>Non-storm water/ illicit connections*</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No			
8	<b>Dust generation and vehicle tracking</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No			
9	<b>General Housekeeping</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No			
10		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No			

\*Include a description of the source, quantity, frequency, and characteristics of the non-storm water discharges, associated drainage area, and whether it is an authorized or unauthorized non-storm water discharge.

**BMP Implementation Tracking and Recording**

<p>Describe all BMP implementation and/or maintenance that occurred since the last inspection here.</p>
---

**Non-Compliance**

Describe any incidents of non-compliance observed and not described above:

**Additional Control Measures\*\***

Describe any additional control measures needed to comply with the permit requirements:

**\*\*Additional Control Measures include the following categories as described in the General Permit:**

**Minimum BMPs:** *Good Housekeeping; Preventative Maintenance; Spill and Leak Protection; Material Handling and Waste Management; Erosion and Sediment Controls; Employee Training; and Quality Assurance and Record Keeping*

**Advanced BMPs:** *Exposure Minimization; Storm Water Containment and Discharge Reduction; and Treatment Control*

**Notes**

Use this space for any additional notes or observations from the inspection:



# Annual Compliance Evaluation Form

General Information			
Facility Name:		Evaluation Date:	
Facility Location:		WDID#:	
Is the SWPPP Onsite?	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	Is the NOI Onsite?	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Document Review Information			
Have all sampling records from the previous reporting year been reviewed?		Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	
Document any trends, concerns, or notable information about sampling records here.			
Have all visual observation and inspection records from the previous reporting year been reviewed?		Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	
Document any trends, concerns, or notable information about inspection records here.			
Have all industrial activity areas and associated potential pollutant sources been inspected for evidence of or the potential for, pollutants entering the storm water conveyance system?		Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	
Document any trends, concerns, or notable information about industrial areas and pollutants here.			
Have all drainage areas previously identified as having no exposure to industrial activities and materials been inspected?		Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	
Document any trends, concerns, or notable information about no exposure areas here.			
Has all equipment needed to implement BMPs been inspected?		Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	
Document any trends, concerns, or notable information about BMP implementation equipment here.			



## Annual Compliance Evaluation Form

Have all BMPs been inspected?	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Document any trends, concerns, or notable information about BMPs here.	
Has a review and effectiveness assessment of all BMPs been conducted for each area of industrial activity and associated pollutant potential sources to determine if the BMPs are properly designed, implemented, and are effective in reducing and preventing pollutants in industrial storm water discharges and authorized non-stormwater discharges?	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Document any trends, concerns, or notable information about BMP effectiveness here.	
Has the SWPPP been reviewed to ensure the information within is accurate for current operations and personnel?	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Document any trends, concerns, or notable information about SWPPP revisions here.	
Have any other factors needed to comply with the requirements of the General Permit been assessed?	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Document any other trends, concerns, or notable information here.	
<b>Inspector Information</b>	
Evaluator Name:	Evaluator Title:
Signature:	Report Date:



General Information			
Facility Name:			
Date:		Event Start Time:	
Sampler:		Rainfall Amount:	<input type="checkbox"/> Today <input type="checkbox"/> Storm
Sampling Event Type:	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Non-storm water	<input type="checkbox"/> Storm Water & NSW
pH Sampling Information			
Method:	<input type="checkbox"/> Litmus Paper <input type="checkbox"/> Test Kit <input type="checkbox"/> Portable Instrument	Portable Instrument Calibration Date/Time:	
Field pH and Turbidity Measurements			
Were field dupliates taken?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Discharge Location	% Total Daily Flow	pH	Time
<b>Sum % Flow (Must = 100)</b>	<b>0</b>		
pH Calculated Average:		#NUM!	
Other Parameters (check those collected)			
Oil and Grease	<input type="checkbox"/>	Other: _____	<input type="checkbox"/>
Total Suspended Solids (TSS)	<input type="checkbox"/>	Other: _____	<input type="checkbox"/>
Other: _____	<input type="checkbox"/>	Other: _____	<input type="checkbox"/>
Other: _____	<input type="checkbox"/>	Other: _____	<input type="checkbox"/>
Was a chain of custody completed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Additional Sampling Notes/Exception Documentation			
Estimated Event End:			

**APPENDIX F**

**General Permit Attachment H “Sample Collection and Handling Instructions” and  
Example Chain of Custody Form**

## ATTACHMENT H

### SAMPLE COLLECTION AND HANDLING INSTRUCTIONS

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
GENERAL PERMIT FOR STORM WATER DISCHARGES  
ASSOCIATED WITH INDUSTRIAL ACTIVITIES  
(GENERAL PERMIT)

For more detailed guidance, Dischargers should refer to the U.S. EPA's "Industrial Stormwater Monitoring and Sampling Guide," dated March 2009, available at: [http://www.epa.gov/npdes/pubs/msgp\\_monitoring\\_guide.pdf](http://www.epa.gov/npdes/pubs/msgp_monitoring_guide.pdf) and the "NPDES Storm Water Sampling Guidance Document," dated July 1992, available at: <http://www.epa.gov/npdes/pubs/owm0093.pdf>.

1. Identify the sampling parameters required to be tested and the number of storm water discharge points that will be sampled. Request the analytical testing laboratory to provide the appropriate number and type of sample containers, sample container labels, blank chain of custody forms, and sample preservation instructions.
2. Determine how samples will be transported to the laboratory. The testing laboratory should receive samples within 48 hours of the physical sampling (unless otherwise required by the laboratory). The Discharger may either deliver the samples to the laboratory, arrange for the laboratory to pick up the samples, or overnight ship the samples to the laboratory. All sample analysis shall be done in accordance with 40 Code of Federal Regulations part 136. Samples for pH have a holding time of 15 minutes.<sup>1</sup>
3. Qualified Combined Samples shall be combined by the laboratory and not by the Discharger. Sample bottles must be appropriately labeled to instruct the laboratory on which samples to combine.
4. Unless the Discharger can provide flow weighted information, all combined samples shall be volume weighted.
5. For grab samples, use only the sample containers provided by the laboratory to collect and store samples. Use of any other type of containers may contaminate samples.
6. For automatic samplers that are not compatible with bottles provided by the laboratory, the Discharger is required to send the sample container included with the automatic sampler to the laboratory for analysis.

---

<sup>1</sup> 40 C.F.R. section 136.3, Table II - Required Containers, Preservation Techniques, and Holding Times.

## SAMPLE COLLECTION AND HANDLING INSTRUCTIONS

7. The Discharger can only use automatic sampling device to sample parameters that the device is designed to. For pH, Dischargers can only use automatic sampling devices with the ability to read pH within 15 minutes of sample collection.
8. The Discharger is prohibited from using an automatic sampling device for Oil and Grease, unless the automatic sampling device is specifically designed to sample for Oil and Grease.
9. To prevent contamination, do not touch inside of sample container or cap or put anything into the sample containers before collecting storm water samples.
10. Do not overfill sample containers. Overfilling can change the analytical results.
11. Tightly screw on the cap of each sample container without stripping the threads of the cap.
12. Complete and attach a label for each sample container. The label shall identify the date and time of sample collection, the person taking the sample, and the sample collection location or discharge point. The label should also identify any sample containers that have been preserved.
13. Carefully pack sample containers into an ice chest or refrigerator to prevent breakage and maintain temperature during shipment. Remember to place frozen ice packs into shipping containers. Samples should be kept as close to 4 degrees Celsius (39 degrees Fahrenheit) as possible until arriving to the laboratory. Do not freeze samples.
14. Complete a Chain of Custody form for each set of samples. The Chain of Custody form shall include the Discharger's name, address, and phone number, identification of each sample container and sample collection point, person collecting the samples, the date and time each sample container was filled, and the analysis that is required for each sample container.
15. Upon shipping/delivering the sample containers, obtain both the signatures of the persons relinquishing and receiving the sample containers.
16. Dischargers shall designate and train personnel to collect, maintain, and ship samples in accordance with the sample protocols and laboratory practices.
17. Refer to Table 1 in the General Permit for test methods, detection limits, and reporting units.
18. All sampling and sample preservation shall be in accordance with 40 Code of Federal Regulations part 136 and the current edition of "Standard Methods for

**SAMPLE COLLECTION AND HANDLING INSTRUCTIONS**

the Examination of Water and Wastewater” (American Public Health Association). All monitoring instruments and equipment (including Discharger field instruments for measuring pH or specific conductance if identified as an additional sampling parameter) shall be calibrated and maintained in accordance with manufacturers’ specifications to ensure accurate measurements. All laboratory analyses shall be conducted according to approved test procedures under 40 Code of Federal Regulations part 136, unless other test procedures have been specified by the Regional Water Quality Control Board. All metals shall be reported as total metals. Dischargers may conduct their own field analysis of pH (or specific conductance if identified as an additional sampling parameter) if the Discharger has sufficient capability (qualified and trained employees, properly calibrated and maintained field instruments, etc.) to adequately perform the field analysis. With the exception of field analysis conducted by Dischargers for pH (or specific conductance if identified as an additional sampling parameter), all analyses shall be sent to and conducted at a laboratory certified for such analyses by the California Department of Public Health. Dischargers are required to report to the Water Board any sampling data collected more frequently than required in this General Permit (Section XXI.J.2)





**APPENDIX G**

**Annual Reports**

**APPENDIX H**

**ERA Evaluations and Reports**

## **APPENDIX I**

**Advanced Treatment System (Chemical & Filtration) Operating Manual,  
including the Gateway Generation Station Quick Operations Guide and Operating Log**