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27 August 2024

Mr. Christopher Hansen
Maintenance, Operations, and Facilities
Mount Diablo Unified School District
1480 Gasoline Alley
Concord, CA 94520

Subject: **Proposal for 2024-2027 Environmental Compliance Assistance for the Maintenance and Operations Complex, Mount Diablo Unified School District**

Dear Mr. Hansen,

Aptim Environmental & Infrastructure, LLC (APTIM) is pleased to present this proposal to provide on-going environmental compliance consultation and professional field services support to Mount Diablo Unified School District (MDUSD) for the Maintenance and Operations Facility (Facility) located at 1480 Gasoline Alley, Concord, CA in Contra Costa County, California. This proposal addresses three compliance areas for the reporting period 01 September 2024 through 31 August 2027. These three compliance areas are:

1. The MDUSD Storm Water Pollution Prevention Plan;
2. Compliance with the requirements of the Central Contra Costa Sanitary District (CCCSD) Class III Industrial Users permit; and
3. Compliance with the requirements of the California Aboveground Petroleum Storage Act, including the Spill Prevention, Control, and Countermeasure Plan.

APTIM's proposed scope of work and cost estimate for each of the three compliance areas is described below.

Scope of Work

MDUSD Storm Water Pollution Prevention

The State of California Industrial Storm Water General Permit (Industrial General Permit, or IGP) Order 2014-0057-DWQ (NPDES No. CAS000001) regulates storm water discharge from various industrial sites, one of which is transportation maintenance activities, such as that operated by MDUSD at the Facility. All facilities operating under the IGP must prepare and maintain a current Storm Water Pollution Prevention Plan (SWPPP), implement a storm water monitoring/sampling program, and file an Annual Report summarizing the sampling and monitoring activities of the previous year.

APTIM understands that MDUSD has implemented programs addressing the Industrial General Permit, and has plans and procedures in place. APTIM has supported these programs in previous years, and this proposal includes activities to continue this support during the reporting year. These supporting tasks include:

1. Storm Water Pollution Prevention Monitoring and Compliance

   APTIM will provide Industrial General Permit storm water monitoring, to include inspections, sampling, and analytical services during each of the three reporting years, as detailed below. The Industrial General Permit (IGP) defines the reporting year as July 1 to June 30 of the subsequent

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year.

A. *Monthly Visual Observations and Best Management Practice (BMP) Inspections*

Monthly visual inspections will include observations of outdoor facility operations and any authorized or unauthorized non-storm water discharges (NSWD) as detailed in the SWPPP. Additionally, APTIM will complete monthly visual observations to:

- Document the presence of, and identify the source of, any pollutants and non-stormwater flows; and
- Evaluate BMPs that may need maintenance, upgrades, or revision.

All observations will be reported to the MDUSD Pollution Prevention Team Leader or designated individual, including BMP deficiencies, for which MDUSD would be responsible for implementing repairs or maintenance under the IGP. APTIM will evaluate and document if response actions have been completed during the subsequent monthly inspection. If identified deficiencies require revision or additional effort to adequately implement, APTIM will inform MDUSD in the observation report. If requested by MDUSD, APTIM can provide revised or new BMP designs; however, the cost for this scope of service is not considered as part of this proposal.

B. *Qualifying Storm Events (QSE)*

The Industrial General Permit requires dischargers covered by the Permit to collect and analyze storm water samples from two (2) QSE's within the first half of each reporting year (July 1 to December 31) and from two (2) QSE's within the second half of each reporting year (January 1 to June 30). A QSE is defined as any precipitation event that produces a stormwater discharge from at least one drainage area identified in the SWPPP and is preceded by at least 48 hours with no discharge from any drainage area.

To ensure compliance with the IGP, an APTIM scientist or technician will collect stormwater samples at the Facility at all discharge locations where storm water discharge is observed for four (4) QSE's during the reporting year, in accordance with the SWPPP.
Samples will be collected at designated sampling locations within four (4) hours of either 1) the start of discharge; or 2) the start of facility operations if the QSE occurs within the previous 12 hours.

APTIM will provide the necessary materials and equipment for sampling and will follow monitoring exceptions (exclusions such as unsafe conditions) and procedures as outlined in the SWPPP. This scope of work and cost estimate assumes that stormwater flow is sufficient that four samples can be collected each time APTIM mobilizes to the Facility, one sample per location identified in the SWPPP.

APTIM will also visually observe storm water discharges for the QSE events sampled as described above. Visual observations shall be employed to detect the presence or absence of floating and suspended materials, oil and grease, discolorations, turbidity, odors, and source(s) of any observed pollutants. APTIM will document QSE sampling and observations on the Visual Observation Log – Sampling Events and Sampling Log, as provided in the SWPPP, Appendix C. If QSE visual observations and sampling are not performed due to lack of QSEs during either monitoring period, APTIM will provide an

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explanation in the Annual Report.

APTIM will make every effort to limit trips to the Facility for sample collection to times when the stormwater flow is sufficient for sample collection from at least one of the four drainage areas. However, because of the time constraints detailed in the Industrial General Permit for sample collection (described above) and unpredictable weather patterns, APTIM staff may mobilize for the collection of samples even though ultimately a minimal amount of rainfall occurs, resulting in insufficient storm water flow for sampling any of the four locations. Additional trips may be required to collect all required samples. Additional charges will accrue for legitimate additional trips. APTIM can, on a time and materials basis, mobilize to collect additional samples at the Facility beyond those necessary to meet the two (2) QSE per half reporting period requirement described above. Such additional sampling events may be completed at the request of the regulatory agency or may be undertaken to lower the average of a particular analyte detected during previous sampling events, to avoid a possible annual Numeric Action Level (NAL) exceedance.

C. *Laboratory Analysis*

APTIM will subcontract with a California Environmental Laboratory Accreditation Program (ELAP)-certified analytical laboratory for analyses of samples collected during all QSE's stormwater events, as detailed in Section 1, Item B, above. APTIM will arrange for sample delivery to the laboratory and will act as laboratory liaison to ensure that the appropriate analytical methods are used, the detection limits are sufficiently low to compare to IGP NALs, data are delivered in a timely manner, and the analytical report meets Facility needs.

Per the Industrial General Permit requirements, the following analyses will be performed for stormwater samples collected at the Facility by APTIM:

- pH (to be conducted in the field at the time samples are collected)
- Total suspended solids (Method SM 2540-D)
- Oil and Grease (Method 1664A)
- Gasoline (TPH-purgeable) (Method 8015 Modified)
- Diesel (TPH-extractable) (Method 8015 Modified)
- Diazinon (Method to be determined in consultation with laboratory)
- Any pollutant likely to be present in discharge as determined during monitoring events may be added to the analyte test list as necessary.
  **Note: Diazinon analysis is not included in this cost estimate. If it is determined diazinon is a required constituent for analysis because of recent on-site use, APTIM will provide a cost estimate under separate cover.*

An APTIM Environmental Scientist or Environmental Engineer will review the laboratory data to ensure that it is complete per the analytical request and that it meets the requirements of the Industrial General Permit's detection limits. APTIM will tabulate the data on the State of California Stormwater Multiple Application and Report Tracking System (SMARTS) Ad Hoc electronic form that must be submitted within 30 days of analytical report receipt. MDUSD will provide access to SMARTS for specified APTIM environmental scientist and/or environmental engineer and certify Ad Hoc forms that are submitted by APTIM on SMARTS.

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2. Annual Comprehensive Site Compliance Evaluation Event

The Industrial General Permit (Section XV) requires one Annual Comprehensive Site Compliance Evaluation (Annual Evaluation) for each reporting year, at least eight months and not more than 16 months after the previous Annual Evaluation. APTIM will perform one yearly comprehensive Facility walkthrough in each of the three years covered by this proposal to prepare the comprehensive annual compliance report portion of the Annual Report. The Facility walkthrough will include a visual inspection, which will be documented on a standard checklist that is based on the IGP requirements for the Annual Evaluation. It will consist of, at a minimum, an inspection of:

- All areas of industrial activity and associated pollutant sources for evidence of (or potential for) pollutants entering the stormwater conveyance system;
- All drainage areas previously identified as having no exposure to industrial activities and materials in accordance with the Industrial General Permit Section XVII;
- Equipment needed to implement BMPs; and
- All installed physical BMPs.

The evaluation will also include the following:

- A review of all sampling, visual observation, and inspection records for the reporting year;
- A 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/preventing pollutants in storm water discharge and authorized NSWD's; and
- A review of the most recent revision of the SWPPP to ensure it is up to date.

3. Annual and Interim Reporting

A. APTIM will provide a brief email and/or verbal summary for MDUSD after sampling activities and/or observations have been completed, including discussion of any issues that require MDUSD attention, if any.

B. APTIM will complete the Annual Report, as required per Section XVI of the Industrial General Permit, and submit the report in electronic format to the SMARTS system. APTIM will input information from inspections, sampling, and the Annual Evaluation for MDUSD and prepare a draft report for MDUSD to review. After satisfactory resolution of all comments, APTIM will submit the report for MDUSD to certify in SMARTS. The Annual Report will be submitted no later than July 15 of each year.

4. SWPPP Updates

The Industrial General Permit requires the discharger to update the facility SWPPP as necessary to address permit or facility changes. The SWPPP is reviewed each year as part of the Annual Evaluation described above to determine if any updates or revisions are necessary. In addition, updates or revisions throughout the year may be necessary as conditions change. MDUSD will be required to certify and changes to the SWPPP that are completed and uploaded to SMARTS.

Based on the results of the Annual Evaluation for the 2023-2024 reporting year, APTIM has determined that the SWPPP does require updating. Specifically, the document requires an update to:

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- Document the Facility continuance in Level 2 status for NAL exceedances of TSS, including Facility evaluation and implementation of any additional BMPs.
- Document the Facility continuance in Level 1 status for instantaneous NAL exceedances for pH, including Facility evaluation and possible implementation of additional BMPs.

In addition to the identified updates, APTIM will conduct an annual audit of the SWPPP to ensure compliance with IGP requirements and identify deficiencies. The audit will include a review of all SWPPP documents including hard copy monitoring and inspection reports that are required to be always kept with the SWPPP. APTIM will provide MDUSD a list of SWPPP issues requiring reconciliation and will assist MDUSD in addressing any concerns.

5. Level 2 Reports

The IGP requires facilities in Level 2 status to prepare and submit via SMARTS a Level 2 Exceedance Response Action (ERA) Plan to address NAL exceedances. The plan shall include the results of a comprehensive facility evaluation as well as a schedule and detailed description of tasks required to complete the selected exceedance corrective actions. Additionally, the IGP requires facilities to prepare and submit via SMARTS a Level 2 Technical Report documenting the results of the ERA Plan implementation. The facility evaluation and both reports must be prepared and certified by a QISP. APTIM will provide a QISP and will prepare and submit both compulsory reports to SMARTS on behalf of MDUSD. In accordance with the IGP (Section XII.D), the ERA plan will be prepared and submitted no later than January 1, 2025. The Level 2 Technical Report will be prepared and submitted no later than January 1 of the reporting year following submittal of the Level 2 ERA Plan (i.e., January 1, 2025). The cost for these services is included as part of this proposal.

MDUSD Industrial User Permit

The Facility discharges wastewater generated on-site to the Central Contra Costa Sewer District (CCCSD) facilities, therefore CCCSD has issued an Industrial User Permit that contains specific process, inspection, sampling, and reporting requirements. APTIM understands that MDUSD has a program in place to meet the permit provisions, and APTIM has implemented the inspection, sampling, and reporting aspects of the program on behalf of MDUSD in previous years. This proposal includes a continuation of APTIM's the activities, including the following tasks:

1. Inspect the wash bay and collect samples from the oil/sand interceptor effluent.

Per the Industrial User Permit, the wash bay and landscape oil/sand interceptors at the Facility must be inspected and sampled once every six months, in December and June.

The CCCSD permit requires that effluent samples from the sample box downstream of the interceptor must be collected during one full workday at regular intervals over 8 hours. A second oil/sand interceptor installed near the landscape equipment staging area, and which has not been used in several years, must also be inspected every six months; in the case of the Facility, APTIM understands inspections will be performed in December and June of each year.

APTIM will inspect the wash bay and collect effluent samples from the wash bay interceptor, as required, in December and again in June of each year of this proposal. APTIM will submit the wash bay samples to an analytical laboratory, review the analytical results, and submit the data to the CCCSD on behalf of MDUSD for each of the two events. Samples will be analyzed for the

parameters listed in MDUSD's Industrial User Permit.

A sampling event during the 2020 reporting year included a result that exceeded the discharge limitation for a single parameter. As a result of this exceedance the Facility was issued a Notice of Violation (NOV). At the request of CCCSD, APTIM collected a confirmation sample and submitted this for additional analysis. APTIM also coordinated with the CCCSD case worker to resolve the NOV status. For future sampling events, APTIM will make reasonable accommodation to coordinate with and assist both MDUSD and CCCSD in the event of a discharge exceedance. For the purposes of this proposal, "reasonable accommodation" is meant to include re-sampling and analysis of no more than two parameters per sampling event, as well as coordination with CCCSD and associated documentation.

2. Prepare the semi-annual Periodic Compliance Report (PCR)

The PCR will be completed using the report form provided by CCCSD. The PCR will be completed and submitted by January 30 of the following year for all December inspections, and by July 31 of the same year for all June inspections, as required by CCCSD.

The MDUSD Industrial Users Permit requires that the wash bay oil/sand interceptor be cleaned and maintained at least every 90 days, and any waste from the maintenance be disposed of in accordance with applicable waste handling and disposal regulations. In addition, MDUSD also handles and disposes of hazardous waste. APTIM understands that MDUSD has contracted with other firms for these activities. Documentation of these activities for the preceding 6 months must be attached to each PCR, which includes cleaning manifests for the maintenance of the wash bay interceptor and waste manifests for any hazardous waste disposal for the past 6 months. MDUSD will provide the documentation to APTIM in a timely manner so that APTIM can complete the PCR as required.

The PCR also summarizes the semi-annual sampling associated with the wash bay and must include the analytical reports. If the data are not received by the time the PCR is submitted, the report must note this with the date of sampling and be amended when the data are received. In the unlikely event this occurs, APTIM will prepare an amended report when the data for the sampling is received.

Spill Prevention Control and Countermeasure (SPCC) Plan

MDUSD meets the definition of a "tank facility" per 40 CFR 112.7 and the California Aboveground Petroleum Storage Act and is therefore required to maintain an up-to-date SPCC Plan. The regulations require that the SPCC Plan be reviewed and re-certified at a minimum of every 5 years if no structural changes have occurred at the facility. MDUSD currently has an SPCC Plan which was prepared in 2010 and was revised and certified by APTIM in 2017. Additionally, the Plan must be amended within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. These amendments must be certified by a Professional Engineer (P.E.). As a result of a significant change in Facility design and operation (installation of a diesel exhaust fluid tank and removal of Tank #3), the SPCC was again reviewed and certified by APTIM in October 2019. Therefore, the next review and certification of the SPCC plan is due in October 2024. There is a planned re-certification of the current SPCC plan during this proposal period of performance, including an update to the SPCC for inclusion of the new tank at the Facility.

Section 1.1 of the MDUSD SPCC Plan stipulates that the Plan be reviewed on an annual basis, and updated to reflect any administrative changes (such as personnel changes or revisions to contact

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information). Typically, these reviews are conducted by MDUSD staff. APTIM will assist in completing these reviews and administrative changes as needed.
In addition to periodic reviews, MDUSD has asked APTIM to conduct monthly and annual facility inspections in accordance with Section 3.7.2 of the SPCC Plan. These inspections include checking tanks and associated piping for leaks, cracks, or other structural integrity issues, as well as verifying proper level gauge operation and other ancillary tasks as described in the Plan. APTIM will complete these monthly inspections and document results using checklists that are included with the SPCC Plan.

Assumptions

The scope of work encompassed by this proposal is based on the following assumptions:

- Access to the site is provided to APTIM during normal working hours (7:30 to 17:30 Monday through Friday) for completion of field activities (i.e., sampling and inspections)
- APTIM will coordinate each site visit with the Building and Grounds Manager or his delegate prior to scheduled field activities to ensure that APTIM has appropriate access to the facility.
- Pertinent documentation associated with the wash bay oil/sand interceptor cleaning and hazardous waste disposal will be provided to APTIM in a timely manner to ensure completion of the PCR and submittal to CCCSD.
- APTIM will conduct storm water compliance program tasks, including the monitoring activities, sample collection and analysis, and reporting on a schedule that is in accordance with the IGP requirements.
- APTIM will conduct the final monthly inspection, the Annual Evaluation, and prepare the Annual Report on a schedule that will allow adequate time for review of the drafts by MDUSD. It is assumed that MDUSD will review the draft Annual Report within 10 business days of receipt from APTIM.
- MDUSD will certify all SMARTS submittals in the online database in a timely manner. APTIM will complete all submittals and ensure notification to MDUSD no less than 10 business days prior to the submittal deadline.
- APTIM will conduct the sampling, inspections, and reporting for this project in accordance with the MDUSD Industrial User Permit.
- No SPCC Plan re-certification by a California P.E. is required during this period of performance, other than that referenced previously in this proposal.

Terms and Cost Estimate

APTIM is proposing to provide the services described in this proposal for **$165,000.00** on a time and materials (T&M) cost basis. An approximate breakdown of costs is attached.

APTIM will provide the work in accordance with its standard terms and conditions as established in the Professional Services Agreement (PSA). Please sign a copy of these standard terms previously agreed to by both parties. A fully executed copy of the Agreement will be returned to you and will service as our notice to proceed. If the proposed work and cost estimate are acceptable. APTIM will schedule the work immediately upon receiving the signed PSA. This proposal is valid for 60 days.

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If you have questions, please do not hesitate to contact the undersigned at 510.386.4252 or via email at drew.potts@aptim.com. Thank you for the opportunity to provide these services.

Sincerely,

Drew Potts
Project Manager, QISP

Amy Martinez, CHMM, PMP
Senior Director

Aptim Environmental & Infrastructure, LLC

Attachments: Client Summary Estimate
Professional Services Agreement

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COST ESTIMATE BREAKDOWN

TASK	ESTIMATE
Storm Water Program Compliance Monitoring and Reporting	$84,210.97
Sanitary Sewer Permit Compliance Support	$45,113.23
SPCC Compliance and Inspections	$24,382.50
Project Management/Administrative	$11,293.29
TOTAL ESTIMATE	**$165,000.00**

$ 55,000.00 per year