EXHIBIT F

SECTION A: THE CHABOT GUN CLUB STORM WATER POLLUTION PREVENTION PLAN REQUIREMENTS

1. Introduction:

This document is the Storm Water Pollution Prevention Plan (SWPPP) for the Chabot Gun Club facility (CGC) located at 9999 Redwood Road in Castro Valley, California.

The Regional Water Quality Control Board has placed the CGC under the existing General Permit for Storm Water Discharges Associated with Industrial Activities for the adjacent East Bay Regional Park District (EBRPD) operated Castro Valley Corporation Yard facility located at 17930 Lake Chabot Road in Castro Valley, California (WDID No. 2 01S003165).

The main environmental concern associated with operations at the CGC is the impact of lead shot and bullets resulting from the firing of guns at the CGC ranges. Soil erosion and the discharge of other material associated with CGC operations (plastic wadding, shells, clay targets, etc.) are also concerns at this site. The CGC has therefore identified Best Management Practices (BMPs) in this SWPPP to minimize lead contaminant releases, erosion and material associated with CGC operations from flowing offsite.

The CGC's office and administrative buildings are not considered a significant threat to storm water and are not addressed in this SWPPP.

2. Objectives

The objectives of this SWPPP are as follows:

- Identify and evaluate the sources of pollution that affect the quality of storm water discharged from the active industrial areas of the site.

- Identify and implement site-specific BMPs to reduce or prevent pollutants associated with industrial onsite activities from entering both storm water and non-storm water discharges.

- Ensure that storm water discharges are in compliance with discharge prohibitions, effluent limitations and receiving water limitations.

- Ensure that pollutant control practices are evaluated and revised as necessary.

- Measure the effectiveness of the BMPs to prevent or reduce pollutants in storm water discharges.

3. Planning and Organization:

    a. Pollution Prevention Team: The individuals responsible for the developing the SWPPP, assisting the CGC Rangemaster in SWPPP implementation and revision and conducting all required monitoring program activities are:

        i. Matthew Graul, EBRPD Water Resources Manager

        ii. Janet Gomes, EBRPD Anthony Chabot Park Supervisor

        iii. Tony Martinez, CGC Health and Safety Officer

        iv. John Maunder, CGC General Manager

4. Site Map:

The CGC site map is attached to this SWPPP's Appendix.

5. List of Significant Materials:

The list of significant materials is as follows:

    a. Lead: Sources include spent bullets, shot and lead dust.

    b. Plastic Wadding: Source is spent shotgun shells.

    c. Soil Erosion: Source is earthen berms used as target backdrops for each shooting range.

The aforementioned significant materials are all subject to storm water exposure. Materials not exposed to storm water are not considered in this SWPPP.

6. Description of Potential Pollutant Sources:

    a. The primary material of concern at the CGC is lead. When bullets or shot exit the gun chamber, lead dust is released to the air and is deposited on the surface of the soil thus having the potential to be released to the environment via storm water runoff. Solid lead shot from shot gun shells can become soluble when exposed to the elements thereby having the potential to enter storm water runoff. Lead-based bullets shot from rifles have the potential to contribute lead to the environment although this is believed to be a minimal source.

b. Plastic wadding from shot casings has the potential to migrate offsite via storm water runoff and clog storm water conveyances and/or become an aesthetic nuisance.

c. Soil erosion due to shooting, precipitation and lead recycling activities can contribute sediment to storm water thereby degrading water quality and potentially transporting lead into the offsite environment.

7. Assessment of Potential Pollutant Sources:

Table 1 summarizes the assessment of potential pollution sources and corresponding best management practices.

8. Storm Water Best Management Practices (BMPs)

The BMPs implemented at the CGC are intended to control potential pollutants and eliminate or minimize potential impacts to storm water. Table 1 includes potential pollution sources and corresponding BMPs.

a. Non-Structural BMPs consist of processes, procedures, scheduled activities, etc., that prevent pollutants associated with operations at the CGC from contacting storm water discharges and non-storm water discharges. Non-structural BMPs implemented at the CGC include:

   i. Good housekeeping practices to prevent trash, waste materials, and target pollutants from entering the drainage system.

   ii. Annual inspection, evaluation and assessment of entire CGC storm water conveyance system.

   iii. Regular preventative maintenance on all components of the CGC storm water conveyance system including: clearing of vegetation from all drop inlet grates and storm water collection structures, clearing of debris from all inlets, basins, culverts and pipes.

   iv. Grading to provide optimal storm water directional flow and volume. **Prior to any work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.**

   v. Development of a lead removal and recycling program to minimize onsite accumulation of lead bullets and shot. **Prior to any work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received. Plans shall include documentation of all areas where topical lead will be removed. During recycling**

program implementation CGC must submit monthly report to EBRPD that documents the amount of lead removed, dates of collection, and weight slips for recycled lead.

vi. Regular removal of bullet shells, plastic wadding and other waste items. **From November to May removal of material from all ranges will occur at least once per month and from June to October at least once every 2 weeks or as needed to maintain the aesthetics and prevent stormwater discharges. Must provide monthly report to EBRPD that includes dates of collection, amounts removed, and weight slips for brass that is recycled.**

vii. Spill prevention and response and immediate notification (within 1 hour of initial spill) of all incidents to the Anthony Chabot park supervisor..

viii. Proper materials handling and storage in compliance with all applicable laws, regulations and BMPs.

ix. Recordkeeping and reporting including procedures to ensure all records of inspections, spills, maintenance activities, corrective actions, visual observations, etc., are developed, retained and provided to regulatory authorities or staff.

x. Erosion control and site stabilization including vegetation planting, appropriate storm water runoff diversion, and use of sediment control devices. **Prior to any work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.**

xi. Employee training including implementation of activities and BMPs identified in the CGC SWPPP; conducting inspections, sampling, and visual observations; and managing storm water will be conducted on an annual basis and as needed. All training records will be maintained onsite. *(EBRPD Risk Manager to be consulted on appropriate PPE or other safety precautions to be taken in order to conduct this work.)*

b. Structural BMPs consist of devices that reduce or prevent pollutants in storm water discharges and non-storm water discharges. Structural BMPs implemented at the CGC include:

i. Straw blankets will be installed at sites with disturbed earth to minimize soil erosion.

ii. Straw wattles are installed around all drop inlet and basin structures to provide filtering of storm water. **Straw wattles will be inspected after rain events and replaced as necessary.**

iii. Reusable storm drain filter inserts are installed in each drop inlet and basin structure to provide filtering of storm water. **Filters will be inspected before and after all rain events and cleaned as needed during the rainy season.**

iv. Drop inlets were strategically placed in gun range turf areas to provide substantial buffering and filtering of storm water.

v. Berms will be developed and constructed to minimize lead bullet and shot "skipping" thereby keeping lead localized and facilitating recovery and recycling processes. **Prior to any work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.**

vi. Seeding for vegetative ground cover will be conducted in areas with exposed soil to minimize erosion. **Composition of seed mix will be determined by EBRPD.**

vii. Installed culvert on the south side of Range 8 to convey storm water to adjacent drainage.

viii. Grading, culverts, trenches and other devices will be installed/constructed to direct flow of storm water, slow run-off and provide erosion control. **Prior to any work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.**

ix. **Replaced culvert on eastern end of site upgradient from trap range to direct flow around trap range and better assess background stormwater conditions.**

9. Annual Comprehensive Site Compliance Evaluation:

CGC and appropriate EBRPD staff will conduct one annual Comprehensive Site Compliance Evaluation during each reporting period (July 1 – June 30) and shall be conducted within 8-16 months of each other. Subsequent to the evaluation and its findings, the CGC SWPPP will be revised, as appropriate, and the revisions implemented within 90 days of the evaluation. Evaluations shall include the following information:

a. A review of visual observation records, inspection records, and sampling and analysis results.

b. A visual inspection of all potential pollutant sources for evidence of, or the potential for, pollutants entering the drainage system.

c. A review and evaluation of all BMPs to determine adequacy and proper implementation and maintenance in order to determine if additional BMPs are needed. A visual inspection of equipment needed to implement the SWPPP shall be included.

d. An evaluation report that includes:

    i. Identification of personnel performing the evaluation

    ii. The date(s) of the evaluation

    iii. Necessary SWPPP revisions

    iv. Schedule for implementing SWPPP revisions

    v. Any incidents of non-compliance and corrective actions taken

    vi. Certification that the CGC is in compliance with this General Permit. If this certification cannot be provided, then an explanation is provided in the evaluation report.

    vii. The evaluation report will be submitted as part of the annual report, retained for at least five years and signed and certified in accordance with Standard Provisions 9 and 10 of Section C of the General Permit.

SECTION B. THE CHABOT GUN CLUB MONITORING PROGRAM AND REPORTING REQUIREMENTS

1. Implementation Schedule:

Development and implementation of the CGC Monitoring and Reporting Program began in August of 2008.

2. Objectives:

The CGC Monitoring and Reporting Program associated with the CGC SWPPP was developed to:

a. Ensure that storm water discharges are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations specified in the General Permit

b. Ensure practices at the CGC to reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges are evaluated and revised to meet changing conditions.

c. Aid in the implementation and revision of the CGC SWPPP.

d. Measure the effectiveness of BMP's to prevent or reduce pollutants in storm water discharges and authorized non-storm water discharges.

3. Non-Storm Water Discharge Observations:

a. CGC operators shall visually observe all drainages within the CGC facility for the presence of unauthorized non-storm water discharges;

b. CGC operators shall visually observe the CGC facility's authorized non-storm water discharges and their sources;

c. The visual observations shall be conducted on a quarterly basis, during daylight hours, on days with no storm water discharges, and during scheduled facility operation hours. Quarterly visual observations shall be conducted in each of the following periods: January – March, April – June, July – September, and October – December. CGC operators shall conduct quarterly visual observations within 6 – 18 weeks of each other. **Quarterly reports shall be submitted to the Anthony Chabot Park Supervisor by the 15th of the month following the inspection.**

d. Visual observations shall document the presence of any discolorations, stains, odors, floating materials, lead bullets/shot, bullet casings/shells, trash, shot wadding, trap/skeet material, irrigation water, etc., as well as any source of any discharge within the storm drain conveyance system and terminal drainage area. Records shall be maintained of the visual observation dates, locations observed, observations, and response taken to eliminate unauthorized non-storm water discharges and to reduce or prevent pollutants from contacting storm water discharges.

4. Storm Water Discharge Visual Observations:

a. CGC operators shall visually observe storm water discharges from one storm event per month during the wet season (October 1st – May 30th). These visual observations shall occur during the first hour of discharge at (1) to the east and upstream of the Trap Range will serve as a background sample (GPS Coordinates: 37°44.626' N 122° 5.776' W) and (2) the CGC terminal drainage area southwest of Range 8 (GPS Coordinates: 37°44.7341' N 122° 6.231' W) which shall represent the quality and quantity of the CGC facility's storm water discharges from the storm event.

b. Visual observations of storm water shall only occur during daylight hours that are preceded by at least three working days without storm water discharges and that occur during scheduled CGC operating hours.

c. Visual observations shall document the presence of any floating and suspended material, oil and grease, discolorations, turbidity, odor, lead bullets/shot, bullet casings/shells, trash, shot wadding, trap/skeet material, etc., and source of any pollutants. Records shall be maintained of observation dates, locations observed, observations, and response taken to reduce or prevent pollutants in storm water discharges. **Monthly storm event visual observation reports shall be submitted to the Anthony Chabot Park Supervisor by the 15th of the month following the inspection.**

5. BMP Inspection and Documentation

a. CGC operators shall assess the BMPs on a monthly basis during the wet season (October 1st – May 30th). Replacement BMPs and minor adjustments to BMPs shall be documented. Prior to any implementation of new BMPS, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.

b. Lead removal and recycling will be documented and recycling weight slips shall be submitted to EBRPD. Regular removal of bullet shells, plastic wadding and other waste items will also be documented. **Monthly reports of lead and brass removal activities that document the location, amounts removed, dates of collection, and weight slips for recycled lead and brass shall be submitted to the Anthony Chabot Park Supervisor by the 15th of the month.**

c. Records shall be maintained of observation dates, locations observed, observations, and response taken to reduce or prevent pollutants in storm water discharges. **Monthly BMP inspection reports shall be submitted to the Anthony Chabot Park Supervisor by the 15th of the month following the inspection.**

6. Sampling and Analysis:

a. EBRPD employees shall collect storm water samples during the first hour of discharge from (1) the first storm event of the wet season, and (2) at least one other storm event in the wet season. Sampling locations will be (1) to the east and upstream of the Trap Range will serve as a background sample (GPS Coordinates: 37°44.626' N 122° 5.776' W) and (2) the CGC terminal drainage area southwest of Range 8 (GPS Coordinates: 37°44.731' N 122° 6.231' W) which shall represent the quality and quantity of the CGC facility's storm water discharges from the storm event.

b. Sample collection of storm water discharges will only occur during scheduled CGC operating hours and that are preceded by at least three working days without storm water discharge.

c. The samples shall be analyzed for:

i. Total suspended solids (TSS), pH, specific conductance, and total organic carbon (TOC). Oil and grease (O&G) may be substituted for TOC; and

ii. Total and dissolved lead.

7. Facilities Subject to Federal Storm Water Effluent Limitation Guidelines:

The CGC facility is not subject to Federal Storm Water Effluent Limitation Guidelines.

8. Sample Storm Water Discharge Locations:

a. The CGC Operators shall visually observe and the EBRPD personnel shall collect samples of storm water discharges from (1) to the east and upstream of the Trap Range will serve as a background sample (GPS Coordinates: 37°44.626' N 122° 5.776' W) and (2) the CGC terminal drainage area southwest of Range 8 (GPS Coordinates: 37°44.731' N 122° 6.231' W) which shall represent the quality and quantity of the CGC facility's storm water discharges from the storm event.

b. Because the CGC facility's storm water discharges will be commingled by run-on primarily from the drainage directly east of the Trap Range, it is anticipated that identifying other observation and sampling locations not commingled with run-on and representative of the quality and quantity specifically of the CGC facility will be difficult. However, because background storm water discharges (run-on) from the east and upstream of the Trap Range and storm water discharges from the CGC terminal drainage area southwest of Range 8 will be collected and analyzed, comparing analytical results from these two locations shall represent the specific quality of the CGC facility's storm water discharges from the storm event.

c. If visual observation and sample collection locations are difficult to observe or sample, CGC operators and EBRPD personnel shall identify and collect samples from other locations that represent the quality of the CGC facility's storm water discharges from the storm event.

9. Visual Observation and Sample Collection Exceptions:

The CGC operators will conduct visual observations and EBRPD personnel shall sample collection to fulfill minimum sampling requirements with the following exceptions:

a. EBRPD personnel shall not collect water samples and CGC operators shall not conduct visual observations when dangerous weather conditions exist or when storm water discharges begin after scheduled CGC operating hours.

b. Samples to determine compliance will only be collected when storm water discharges are preceded by three working days without discharge.

c. Visual observations are only required during daylight hours.

10. Alternative Monitoring Procedure:

The CGC operators do not anticipate proposing an alternative monitoring program to meet monitoring program objectives at this time. However, should the need to

propose an alternative monitoring program exist in the future, this alternative monitoring program will be executed only after approval of the RWQCB.

11. Monitoring Methods:

a. The CGC monitoring program objectives will be satisfied through visual observations, sampling methods and analytical methods as follows:

i. Visual Observations: The visual observations regarding non-storm water discharges shall be conducted on a quarterly basis, during daylight hours, on days with no storm water discharges, and during scheduled facility operation hours. Quarterly visual observations shall be conducted in each of the following periods: January – March, April – June, July – September, and October – December. CGC operators shall conduct quarterly visual observations within 6 – 18 weeks of each other. Non-storm water visual observations shall document the presence of any discolorations, stains, odors, floating materials, lead bullets/shot, bullet casings/shells, trash, shot wadding, trap/skeet material, irrigation water, etc., as well as any source of any discharge within the storm drain conveyance system and terminal drainage area. Records shall be maintained of the visual observation dates, locations observed, observations, and response taken to eliminate unauthorized non-storm water discharges and to reduce or prevent pollutants from contacting storm water discharges.

ii. The CGC operators shall visually observe storm water discharges from one storm event per month during the wet season (October 1st – May 30th). These visual observations shall occur during the first hour of discharge at (1) to the east and upstream of the Trap Range will serve as a background sample (GPS Coordinates: 37°44.626' N 122° 5.776' W) and (2) the CGC terminal drainage area southwest of Range 8 (GPS Coordinates: 37° 44.731' N, 122° 6.213' W) which shall represent the quality and quantity of the CGC facility's storm water discharges from the storm event. Visual observations of storm water shall only occur during daylight hours that are preceded by at least three working days without storm water discharges and that occur during scheduled CGC operating hours. Visual observations shall document the presence of any floating and suspended material, oil and grease, discolorations, turbidity, odor, lead bullets/shot, bullet casings/shells, trash, shot wadding, trap/skeet material, etc., and source of any pollutants. Records shall be maintained of observation dates, locations observed, observations, and response taken to reduce or prevent pollutants in storm water discharges.

The rationale of these storm and non-storm visual observations will be the ability to compare and observe conditions throughout the CGC storm water conveyance system during dry and wet weather seasons and identify impacts on storm water quality due to activities at the CGC facility.

iii. Sampling Methods: The EBRPD personnel shall collect samples of storm water discharges from (1) to the east and upstream of the Trap Range will serve as a background sample (GPS Coordinates: 37°44.626' N 122° 5.776' W) and (2) the CGC terminal drainage area southwest of Range 8 (GPS Coordinates: 37° 44.731' N, 122° 6.213' W) which shall represent the quality and quantity of the CGC facility's storm water discharges from the storm event. The samples shall be analyzed for:

1. Total suspended solids (TSS), pH, specific conductance, and total organic carbon (TOC). Oil and grease (O&G) may be substituted for TOC; and

2. Total and dissolved lead.

The rationale of the CGC sampling locations (to the east and upstream of the Trap Range and storm water discharges from the CGC terminal drainage area southwest of Range 8) and methods is the comparison of analytical results from these two locations shall represent the specific quality of the CGC facility's storm water discharges from the storm event.

iv. The parameters chosen for storm water analysis were identified by requirements of this permit and by assuming what pollutants may be generated and impacting storm water discharges by the activities of the CGC facility. All analytical detection limits will be adequate to satisfy the objectives of the CGC monitoring program.

b. All sampling procedures will be conducted in accordance with the current edition of "Standard Methods for the Examination of Water and Wastewater" (American Public Health Association). All laboratory analyses will be conducted according to test procedures under 40 CFR Part 136. With the exception of analyses conducted by CGC operators, all laboratory analyses shall be conducted at a laboratory certified for such analyses by the State Department of Public Health. All monitoring instruments and equipment (including CGC operator's field instruments for measuring pH and electro conductivity) shall be calibrated and maintained in accordance with manufacturer's specifications to ensure accurate measurements.

12. Sampling and Analysis Exemptions and Reductions:

After the appropriate number of sampling events has been conducted with associated analytical results below levels of regulatory or environmental concern, sampling and analysis exemptions and reductions may be pursued by EBRPD personnel or CGC operators in accordance with this General Permit.

13. Records:

Records of all storm water monitoring information and copies of all reports (including Annual Reports) shall be retained for a period of at least five years. These records shall include:

a. The date, place, and time of site inspections, sampling, visual observations, and/or measurements;

b. The individual(s) who performed the site inspections, sampling, visual observations, and or measurements;

c. The date and approximate time of analyses;

d. The individual(s) who performed the analyses;

e. Analytical results, method detection limits, and the analytical techniques or methods used;

f. Quality assurance/quality control records and results;

g. Non-storm water discharge inspections and visual observations and storm water discharge visual observation record;

h. Visual observation and sample collection exception records;

i. All calibration and maintenance records of on-site instruments used;

j. All Sampling and Analysis Exemption and Reduction Certifications and supporting documentation;

k. The records of any corrective actions and follow-up activities that resulted from the visual observations.

14. Annual Report:

EBRPD personnel shall submit an Annual Report by July 1st of each year to the Executive Officer of the RWQCB, San Francisco Bay Region. The reports shall

include a summary of visual observations and sampling results, an evaluation of the visual observation and sampling and analysis results, laboratory reports, the Annual Comprehensive Site Compliance evaluation Report, an explanation of why CGC did not implement activities required by the General Permit, and records specific to visual observation and sample collection exceptions. Analytical results shall include method detection limits for each analytical parameter and for results that are less than the detection limit shall be reported as "less than the method detection limit". The Annual Report shall be signed and certified in accordance to the General Permit. The EBRPD personnel will shall prepare and submit the Annual Report using the annual report forms provided by the State Water Board or Regional Water Board or shall submit their information on a form that contains equivalent information.

15. Group monitoring:

Group monitoring of the CGC facility is not anticipated at this time.

EXHIBIT F

Environmental Stewardship Work Plan
Implementation of Chabot Gun Club (CGC)
Stormwater Pollution Prevention Plan (SWPPP)

The CGC shall implement the following measures in order to implement the SWPPP and comply with stormwater regulations.

a. Non-structural Best Management Practices (BMPs) implemented at the CGC shall include:

   i. Good housekeeping practices to prevent trash, waste materials, and target pollutants from entering the drainage system.

   ii. Regular preventative maintenance on all components of the CGC storm water conveyance system including: clearing of vegetation from all drop inlet grates and storm water collection structures, clearing of debris from all inlets, basins, culverts and pipes prior to rain events.

   iii. Grading to provide optimal storm water directional flow and volume. **Prior to any work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.**

   iv. Implementation of a lead removal plan and a recycling program to minimize onsite accumulation of lead bullets and shot. **Prior to any work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received. Plans shall include documentation of all areas where topical lead will be removed. During recycling program implementation CGC must submit monthly report to EBRPD that documents the amount of lead removed, dates of collection, and weight slips for recycled lead.**

   v. Regular removal of brass, plastic wadding, shot shells, and other waste items from ranges. **From November to May removal of material from all ranges will occur at least once per month and from June to October at least once every 2 weeks or as needed to maintain the aesthetics and prevent stormwater discharges. Must provide monthly report to EBRPD that includes dates of collection, amounts removed, and weight slips for brass that is recycled.**

vi. Spill prevention, response and immediate notification (within 1 hour of initial spill) of all incidents to the Anthony Chabot park supervisor.

vii. Proper materials handling and storage in compliance with all applicable laws, regulations and BMPs.

viii. Erosion control and site stabilization including vegetation planting, appropriate storm water runoff diversion, and use of sediment control devices. **Prior to any work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.**

ix. Employee training including implementation of activities and BMPs identified in the CGC SWPPP; conducting inspections, sampling, and visual observations; and managing storm water will be conducted on an annual basis and as needed. All training records will be maintained onsite. *(EBRPD Risk Manager to be consulted on appropriate PPE or other safety precautions to be taken in order to conduct this work.)*

b. Structural BMPs consist of devices that reduce or prevent pollutants in storm water discharges and non-storm water discharges. Structural BMPs that are being implemented at the CGC include:

i. Straw blankets will be installed at sites with disturbed earth to minimize soil erosion.

ii. Straw wattles are installed around all drop inlet and basin structures to provide filtering of storm water. **Straw wattles will be inspected after rain events and replaced as necessary.**

iii. Reusable storm drain filter inserts are installed in each drop inlet and basin structure to provide filtering of storm water. **Filters will be inspected before and after all rain events and cleaned as needed during the rainy season.**

iv. Drop inlets were strategically placed in gun range turf areas to provide substantial buffering and filtering of storm water.

v. Berms will be developed and constructed to minimize lead bullet and shot "skipping" thereby keeping lead localized and facilitating recovery and recycling processes. **Prior to any work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.**

vi. Seeding for vegetative ground cover will be conducted in areas with exposed soil to minimize erosion. **Composition of seed mix will be determined by EBRPD.**

vii. Installed culvert on the south side of Range 8 to convey storm water to adjacent drainage.

viii. Grading, culverts, trenches and other devices will be installed/constructed to direct flow of storm water, slow run-off and provide erosion control. **Prior to any work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.**

ix. Replaced culvert on eastern end of site upgradient from trap range to direct flow around trap range and better assess background stormwater conditions.

Monitoring and Reporting:

1) CGC and appropriate EBRPD staff will conduct one annual Comprehensive Site Compliance Evaluation including an entire CGC stormwater conveyance system inspection during each reporting period (July 1 – June 30) and shall be conducted within 8-16 months of each other. Subsequent to the evaluation and its findings, the CGC SWPPP will be revised, as appropriate, and the revisions implemented within 90 days of the evaluation. Evaluations shall include the following information:

    a. A review of visual observation records, inspection records, and sampling and analysis results.

    b. A visual inspection of all potential pollutant sources for evidence of, or the potential for, pollutants entering the drainage system.

    c. A review and evaluation of all BMPs to determine adequacy and proper implementation and maintenance in order to determine if additional BMPs are needed. A visual inspection of equipment needed to implement the SWPPP shall be included.

2) Non-Storm Water Discharge Observations:

    a. CGC operators shall visually observe all drainages within the CGC facility for the presence of unauthorized non-storm water discharges;

b. CGC operators shall visually observe the CGC facility's authorized non-storm water discharges and their sources;

c. The visual observations shall be conducted on a quarterly basis, during daylight hours, on days with no storm water discharges, and during scheduled facility operation hours. Quarterly visual observations shall be conducted in each of the following periods: January – March, April – June, July – September, and October – December. CGC operators shall conduct quarterly visual observations within 6 – 18 weeks of each other. **Quarterly reports shall be submitted to the Anthony Chabot Park Supervisor by the 15th of the month following the inspection.**

d. Visual observations shall document the presence of any discolorations, stains, odors, floating materials, lead bullets/shot, bullet casings/shells, trash, shot wadding, trap/skeet material, irrigation water, etc., as well as any source of any discharge within the storm drain conveyance system and terminal drainage area. Records shall be maintained of the visual observation dates, locations observed, observations, and response taken to eliminate unauthorized non-storm water discharges and to reduce or prevent pollutants from contacting storm water discharges.

3) Storm Water Discharge Visual Observations:

a. CGC operators shall visually observe storm water discharges from one storm event per month during the wet season (October 1st – May 30th). These visual observations shall occur during the first hour of discharge at (1) to the east and upstream of the Trap Range will serve as a background sample (GPS Coordinates: 37°44.626' N 122° 5.776' W) and (2) the CGC terminal drainage area southwest of Range 8 (GPS Coordinates: 37° 44.731' N, 122° 6.213' W) which shall represent the quality and quantity of the CGC facility's storm water discharges from the storm event.

b. Visual observations of storm water shall only occur during daylight hours that are preceded by at least three working days without storm water discharges and that occur during scheduled CGC operating hours.

c. Visual observations shall document the presence of any floating and suspended material, oil and grease, discolorations, turbidity, odor, lead bullets/shot, bullet casings/shells, trash, shot wadding, trap/skeet material, etc., and source of any pollutants. Records shall be maintained of observation dates, locations observed, observations, and response taken to reduce or prevent pollutants in storm water discharges. **Monthly storm event visual observation reports shall be submitted to**

the Anthony Chabot Park Supervisor by the 15th of the month following the inspection.

4) BMP Inspection and Documentation

a. CGC operators shall assess the BMPs on a monthly basis during the wet season (October 1st – May 30th). Replacement BMPs and minor adjustments to BMPs shall be documented. Prior to any implementation of new BMPS, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.

b. Lead removal and recycling will be documented and recycling weight slips shall be submitted to EBRPD. Regular removal of bullet shells, plastic wadding and other waste items will also be documented. **Monthly reports of lead and brass removal activities that document the location, amounts removed, dates of collection, and weight slips for recycled lead and brass shall be submitted to the Anthony Chabot Park Supervisor by the 15th of the month.**

c. Records shall be maintained of observation dates, locations observed, observations, and response taken to reduce or prevent pollutants in storm water discharges. **Monthly BMP inspection reports shall be submitted to the Anthony Chabot Park Supervisor by the 15th of the month following the inspection.**

5) Sampling and Analysis:

a. EBRPD Water Management staff shall collect storm water samples during the first hour of discharge from (1) the first storm event of the wet season, and (2) at least one other storm event in the wet season. Sampling locations will be (1) to the east and upstream of the Trap Range will serve as a background sample (GPS Coordinates: 37°44.626' N 122° 5.776' W) and (2) the CGC terminal drainage area southwest of Range 8 (GPS Coordinates: 37° 44.731' N, 122° 6.213' W) which shall represent the quality and quantity of the CGC facility's storm water discharges from the storm event.

b. Sample collection of storm water discharges to determine compliance will only occur during scheduled CGC operating hours and that are preceded by at least three working days without storm water discharge.

c. The samples shall be analyzed for:

i. Total suspended solids (TSS), pH, specific conductance, and total organic carbon (TOC). Oil and grease (O&G) may be substituted for TOC; and

ii. Total and dissolved lead.

EXHIBIT G

TABLE 1: ASSESSMENT OF POTENTIAL POLLUTANT SOURCES AND CORRESPONDING BEST MANAGEMENT PRACTICES

Source Location	Activity	Pollutant Source	Potential Pollutants	BMPs
Range 1- Basin R1	Rifle/Pistol Shooting	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • ¾" Crushed aggregate • Straw wattles • Metal sock • ERTEC hard surface guard
Range 2 - Basin R2A	Rifle/Pistol Shooting	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles
Range 2 - Basin R2B	Rifle/Pistol Shooting	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles
Range 3 – Basin R3A	Pistol Shooting	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles • Metal sock • ERTEC hard surface guard
Range 3 – Basin R3B	Pistol Shooting	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • ¾" Crushed aggregate • Straw wattles • Metal sock • ERTEC hard surface guard

EXHIBIT G

TABLE 1: ASSESSMENT OF POTENTIAL POLLUTANT SOURCES AND CORRESPONDING BEST MANAGEMENT PRACTICES

Source Location	Activity	Pollutant Source	Potential Pollutants	BMPs
Range 4 – Basin R4A	Rifle/Pistol Shooting	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles
Range 4 – Basin R4B	Rifle/Pistol Shooting	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • ¾" Crushed aggregate • Straw wattles • Metal sock • ERTEC hard surface guard
Range 5 – Basin R5	Rifle/Pistol Shooting	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles • Metal sock • EnviroSoxx inside the drain
Range 6 – Basin R6A	Not Currently in Operation	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles
Range 6 – Basin R6B	Not Currently in Operation	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles • EnviroSoxx inside the drain

EXHIBIT G

TABLE 1: ASSESSMENT OF POTENTIAL POLLUTANT SOURCES AND CORRESPONDING BEST MANAGEMENT PRACTICES

Source Location	Activity	Pollutant Source	Potential Pollutants	BMPs
Range 8 - Basin R8	Rifle Shooting	Lead bullets, lead dust, shell casings, soil erosion	Lead, shell casings, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles • Hydro-seeding • Grading to maintain optimum storm water directional flow
Trap Range – Basin TR1	Skeet Shooting	Lead shot, lead dust, plastic wadding, soil erosion	Plastic, lead, sediment	• Lead recycling • Regular plastic wadding removal • Good housekeeping • Storm drain grate filters • Straw wattles

EXHIBIT H - CHABOT GUN CLUB MONTHLY ASSESSMENT AND MAINTENANCE OF BEST MANAGEMENT PRACTICES

Month/Year _____ Chabot Gun Club Compliance Officer Signature_____

Source Location	Potential Pollutants	BMPs	Monthly BMP Observation and/or Maintenance with Dates & Initials	Amounts of lead/casings removed with Dates (Include copies of receipts)
Range 1- Basin R1	Shell casings, lead, sediment	• Lead recycling • Shell casings removal • Good housekeeping • Storm drain grate filters • ¾" Crushed aggregate • Straw wattles • Metal sock • ERTEC hard surface guard		
Range 2 - Basin R2A	Shell casings, lead, sediment	• Lead recycling • Shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles		
Range 2 - Basin R2B	Shell casings, lead, sediment	• Lead recycling • Shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles		
Range 3 – Basin R3A	Shell casings, lead, sediment	• Lead recycling • Shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles • Metal sock • ERTEC hard surface guard		
Range 3 – Basin R3B	Shell casings, lead, sediment	• Lead recycling • Shell casings removal • Good housekeeping • Storm drain grate filters • ¾" Crushed aggregate • Straw wattles • Metal sock • ERTEC hard surface guard		
Range 4 – Basin R4A	Shell casings, lead, sediment	• Lead recycling • Regular shell casings removal • Good housekeeping		

EXHIBIT H - CHABOT GUN CLUB MONTHLY ASSESSMENT AND MAINTENANCE OF BEST MANAGEMENT PRACTICES

		• Storm drain grate filters • Straw wattles		
Source Location	Potential Pollutants	BMPs	Monthly BMP Observation and/or Maintenance with Dates & Initials	Amounts of lead/casings removed with Dates (Include copies of receipts)
Range 4 – Basin R4B	Shell casings, lead, sediment	• Lead recycling • Shell casings removal • Good housekeeping • Storm drain grate filters • ¾" Crushed aggregate • Straw wattles • Metal sock • ERTEC hard surface guard		
Range 5 – Basin R5	Shell casings, lead, sediment	• Lead recycling • Shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles • Metal sock • EnviroSoxx inside drain		
Range 6 – Basin R6A	Shell casings, lead, sediment	• Lead recycling • Shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles		
Range 6 – Basin R6B	Shell casings, lead, sediment	• Lead recycling • Shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles • EnviroSoxx inside drain		
Range 8 - Basin R8	Shell casings, lead, sediment	• Lead recycling • Shell casings removal • Good housekeeping • Storm drain grate filters • Straw wattles		
Trap Range – Basin TR1	Plastic, lead, sediment	• Lead recycling • Plastic wadding removal • Good housekeeping • Storm drain grate filters • Straw wattles		

EXHIBIT H - CHABOT GUN CLUB MONTHLY ASSESSMENT AND MAINTENANCE OF BEST MANAGEMENT PRACTICES

Source Location	Potential Pollutants	BMPs	Monthly BMP Observation and/or Maintenance with Dates & Initials	Amounts of lead/casings removed with Dates (Include copies of receipts)
B1to the East and South of Trap Range	Drainage	• Metal sock • EnviroSoxx		
Chabot Gun Club Entrance Basin	Drainage	• To be implemented by CGC		
R8 South side of the Parking Lot	Runoff	• To be implemented by CGC		
Culvert at the junction of Brandon Trail and Service Road	Drainage	• To be implemented by CGC		

- Replacement or minor adjustments should be noted and dated with the name of the person performing the work.
- Prior to any new BMP products or placements or grading, culverts, trenches and other devices installed/constructed to direct flow of storm water, slow run-off and provide erosion control work, CGC will provide a written project description to the Anthony Chabot park supervisor. Work can proceed only after written approval from EBRPD is received.
- This form needs to be submitted to the Anthony Chabot Park Supervisor by the 15th of the following month.

EXHIBIT H
CHABOT GUN CLUB
STORM WATER DISCHARGE VISUAL OBSERVATIONS

CGC operators will visually observe storm water discharges from one storm event per month during the wet season (October 1st – May 30th) and shall occur during the first hour of discharge at the CGC terminal drainage area southwest of Range 8. Observations shall occur during daylight hours that are preceded by at least three (3) working days without storm water discharges and during scheduled facility operating hours.

DATE:_____ TIME:_____ OBSERVER:_____

LOCATION	FLOATING/SUSPENDED MATERIAL	OIL & GREASE	COLOR	TURBIDITY	ODOR	LEAD BULLETS/SHOT	BULLET CASINGS	SHOT WADDING	TRASH	OTHER	COMMENTS/REQUIRED RESPONSE
Terminal Drainage											

	Additional Notes

EXHIBIT H

CHABOT GUN CLUB
NON-STORM WATER DISCHARGE VISUAL OBSERVATIONS

The non-storm water discharge visual observations shall be conducted quarterly during the following periods: January–March, April–June, July-September, October-December, during daylight hours, on days with no storm water discharges, and during scheduled facility operating hours. All sources of non-storm water discharges shall be noted.

DATE:_____ TIME:_____ OBSERVER:_____

LOCATION	CLEAR	COLOR/ STAINS	ODORS	FLOATING MATERIALS	LEAD BULLETS/SHOT	BULLET CASINGS	SHOT WADDING	TRASH	WATER	OTHER	COMMENTS/REQUIRED RESPONSE
CR8A											
CR8B											
R8											
R1											
R2B											
R2A											
R3B											
R3A											
R4B											
R4A											
R5											
R6B											
R6A											
TR1											
B2											