

SECTION C-9

EXISTING DEVELOPMENT

**PROGRAM EFFECTIVENESS ASSESSMENT
2013-14**



SECTION C-9, Existing Development

C-9.0 EXISTING DEVELOPMENT

C-9.1 Introduction

The existing development component of this report is composed of the following elements:

Section C-9.2, Industrial Program

Section C-9.3, Commercial Program

Section C-9.4, Residential Program

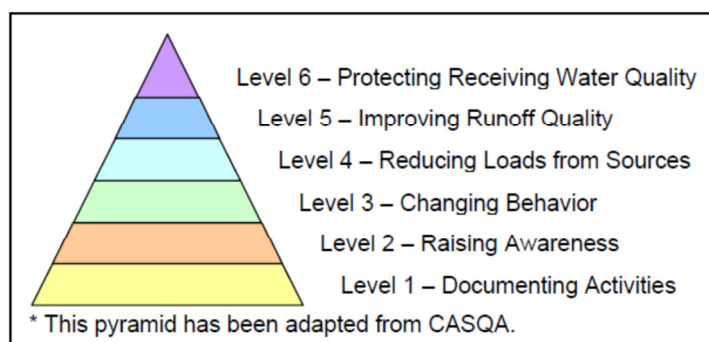
Section C-9.5, Common Interest Area/Homeowner Association (CIA/HOA) Program

Section C-9.6, Mobile Business Program

Section C-9.7, Post-Construction BMP Inspection and Verification for Existing Development

Section C-9.8, Existing Development Program Modifications

As described in detail in **Section C-2.5** of this PEA, the County utilizes the CASQA method of effectiveness assessment in order to demonstrate if program elements, activities, BMPs, etc., are resulting in desired outcomes. CASQA identifies six Outcome Levels (see pyramid below) and for each measure the County reports, the associated Outcome Level (more than one level may apply) is indicated by a colored triangle with a number.



The County has incorporated GIS mapping into the existing development component. Watershed maps of inventoried industrial/commercial facilities in the County's jurisdiction are included in **Attachment C-9.1**.

C-9.2 Industrial Program (LIP Section A-9.1)

C-9.2.1 Organization Chart

Figure A-9.1 of the LIP provides an organizational chart that identifies which County Departments are responsible for overseeing, implementing, and enforcing the Industrial Program.



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C-9.2.2 Inventory

The County has developed a watershed based inventory of industrial facilities within its jurisdiction. Summaries of the industrial inventory are provided below by Regional Board region.

2013-14 Summary of Industrial Facilities by Watershed
San Diego Region

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams	Aliso Creek	Totals
Industrial Facilities With General Industrial Permits	7	1	2	1	11
Industrial Facilities Without General Industrial Permits	3	0	0	0	3
Totals	10	1	2	1	14

Santa Ana Region

Watershed	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay	Totals
Industrial Facilities With General Industrial Permits	1	0	2	2	5
Industrial Facilities Without General Industrial Permits	2	1	1	0	4
Totals	3	1	3	2	9

The County's industrial facility inventory is updated on an ongoing basis and provided to the Regional Boards on an annual basis. The County's inventory is managed through an online web-based database with GIS capabilities called MS4Web. The database includes pertinent information about each facility to meet Fourth Term Permit requirements. In lieu of submitting



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data tables showing facility information, the County database information is available through the following web links:

Website (Inventory): <http://www.ms4web.com/base/wbin/IndustrialFacilities.aspx?ns=25>

User Name: PEA

Password: ocMS4!

C-9.2.3 Prioritization

The County prioritizes industrial facilities in its inventory as high, medium, or low in the Santa Ana Region based on their respective threat to water quality, type of industrial activities, and other related factors. The industrial prioritization is evaluated on an ongoing basis, and industrial inventories are segregated by Regional Board jurisdiction due to the different NPDES permit requirements for each region. The Fourth Term Permit for the San Diego Region does not require prioritization of facilities as high, medium, or low; however the County has retained its historical designations of these sites as part of its inventory. Summaries of the prioritizations for the Santa Ana Region and San Diego Region are provided below.

2013-14 Summary of Industrial Facility Prioritization

Industrial Facility Prioritizations		San Diego Region	Santa Ana Region	Total Number of Facilities
High Priority	Facilities subject to the Industrial General Permit or equivalent permit	11	5	16
	Section 313 Title III Sara	0	0	0
	Facilities with a high potential for or history of non-stormwater discharges	0	0	0
	Facilities tributary to and within 500 feet of an ASBS	0	0	0
	Tributary to 303(d) water body where site generates the pollutant	0	0	0
	Facilities within, directly adjacent to or discharging directly to an ESA	0	0	0
	Number of "other" high priority facilities	0	0	0
Subtotal: number of high priority facilities listed above		11	5	16
Number of medium priority facilities		0	0	0
Number of low priority facilities		3	4	7
Total Number of Facilities		14	9	23



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The following tables show how the facilities listed above are segregated by watershed in each Regional Board jurisdiction. For the Santa Ana Regional Board area, the County has a total of 9 industrial sites. In lieu of the minimum 10% high and 20% medium priority designations included in the Fourth Term Permit, the County has elected to designate 5 of the 9 sites in its inventory (56%) as high priority.

**2013-14 Summary of Industrial Facility Prioritization by Watershed
San Diego Region**

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams	Aliso Creek	Totals
Number of high priority facilities	7	1	2	1	11
Number of low priority facilities	3	0	0	0	3
Totals	10	1	2	1	14

Santa Ana Region

Watershed	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay	Totals
Number of high priority facilities	1	0	2	2	5
Number of low priority facilities	2	1	1	0	4
Totals	3	1	3	2	9

C-9.2.4 Monitoring

When available, the County reviews facility monitoring data at industrial sites in its inventory. This task is completed as part of the inspection process, when County inspectors ask to review available stormwater monitoring data from the industrial facility operators that monitor their runoff. If no recent data is available, industrial facilities are reminded verbally that they must conduct all required monitoring specified in their Industrial General Permit requirements.



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C-9.2.5 BMP Fact Sheets

BMP fact sheets have been developed and included as part of the Existing Development Program. The fact sheets include a description of specific BMPs for common industrial activities that may discharge pollutants and provide corresponding pollution prevention measures that facilities can implement to help meet the requirements of the Fourth Term Permits, the County and OCFCD Water Quality Ordinances, and the Industrial General Permit. The activity-based industrial/commercial fact sheets are numbered IC1 - IC24 and are included as **Exhibit A-9.II** of the County's LIP.

C-9.2.6 Inspections

The County inspects industrial facilities within its jurisdiction at the frequency determined by the priority ranking assigned to each facility as identified in **Section A-9.2** of its LIP. The inspections generally include a review of the material and waste handling practices, BMP implementation, and evidence of past or present unauthorized non-stormwater discharges. If there is evidence of a violation of the County and/or OCFCD Water Quality Ordinances, the County re-inspects the industrial facility in accordance with the corresponding permit requirements and provides appropriate Regional Board notifications.

The following table presents the inspection frequency by Regional Board jurisdiction:

Industrial Facility Inspection Frequency

Priority	Santa Ana Region	San Diego Region*
High	Annually	Annually
Medium	Biennially (Once every 2 years)	As-needed
Low	Once Per Permit Cycle (5 years)	As-needed

*The Fourth Term Permit for the San Diego Region does not require prioritization of industrial sites; however, the County has inspected each industrial facility in its jurisdiction during the 2013-14 reporting year. The Fourth Term Permit in the San Diego Region does require that the County inspect 20% of its combined industrial and commercial inventory; therefore, the County adds the number of industrial inspections completed to its commercial inspection amounts and reports on this combined total in **Section C-9.3.5**.



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A summary of the number of industrial facility inspections completed during the 2013-14 reporting period is presented in the table below.

Jurisdictional Industrial Facility Inspection Summary



Total Number of Industrial Facilities	Number of Facilities Inspected During the Reporting Period			
	High	Med	Low	Totals
14 (San Diego Region)*	9	None in inventory	3	12
10 (Santa Ana Region)*	5		0	5
Totals	14	0	3	17

*As of the 2013-14 reporting period, all inventoried industrial sites have been inspected at least once by the County through year four of the Fourth Term Permits in both the Santa Ana and San Diego Regional Board areas. The County also tracks Regional Board industrial general permit inspections through SMARTS; there were six industrial facility inspections conducted by Regional Board staff in 2013-14

For the Santa Ana Regional Board area, the County completed industrial NPDES inspections at its five high priority sites and none of its low priority sites. The high priority sites include two private companies, R.J. Noble and Merlex Stucco, both located in unincorporated Orange-Olive. The other three sites inspected include John Wayne Airport, Olinda Alpha Landfill, and Frank R. Bowerman Landfill, which are all public facilities managed by County Departments and report to the Santa Ana Regional Board through the Industrial General Permit. Additional information on BMP implementation issues for the Santa Ana Regional Board area is provided in Section C-9.2.7 below, and Section C-9.2.8 contains enforcement information.

In the San Diego Regional Board area, the County conducted industrial inspections at twelve facilities in its inventory. None of the five the inspections in the San Diego Region resulted in enforcement actions under County Water Quality Ordinances. For each inspection, BMP implementation procedures were evaluated and addressed with the on-site operators as part of the annual inspection process and to ensure proper BMP implementation. Additional information on BMP implementation issues for the San Diego Region is provided in Section C-9.2.7 below.

The County continues to see a high level of cooperation and responsiveness at industrial facilities within its jurisdiction. County staff has observed an increase in knowledge and awareness of staff assigned to NPDES programs at most of these industrial facilities which has resulted in improved BMP implementation (Level 3 Outcome) and anticipated reduced pollutant loads from sources (potential Level 4 Outcome).

The industrial inspection information and database is updated on an ongoing basis. In addition, industrial inspection data for the Santa Ana Region is incorporated into the Quarterly Summary of Inspections that is submitted to the Regional Board. The updated inspection database is stored in MS4Web through the website links provided in Section C-9.2.2 above.



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C-9.2.7 BMP Implementation

As part of the industrial facility inspections, the County inspector determines the level of BMP implementation and also assesses the effectiveness of implemented BMPs. To facilitate this process, the County’s inspection form is broken down by facility activity types based on the industrial/commercial BMP fact sheets IC1 - IC24.

The inspector may encounter situations where BMPs are in place but are not effectively applied, or where housekeeping adjustments would improve the overall BMP implementation. If BMP improvements are needed, the inspectors use their best professional judgment in deciding how much time to allow the owner or facility operator to correct the deficiency. The inspectors may verify the BMP implementation through a variety of means, including directions in the routine inspection report, requesting appropriate verification from the property owner (such as photo-documentation), and/or through additional inspections.

A summary of BMP implementation based on County inspections conducted during the current reporting period is provided below:

2013-14 Watershed Summary of BMP Implementation at Industrial Sites



San Diego Region

Watershed	San Juan Creek	Dana Point Coastal Streams	Aliso Creek	San Clemente Coastal Streams
Number of industrial facilities with BMPs fully implemented	3	1	0	0
Number of industrial facilities with BMPs partially implemented	1	0	1	1
Number of industrial facilities with no BMPs	0	0	0	0

Santa Ana Region

Watershed	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbor	Santa Ana River	Newport Bay
Number of industrial facilities with BMPs fully implemented	0	0	0	1
Number of industrial facilities with BMPs partially implemented	1	0	2	1
Number of industrial facilities with no BMPs	0	0	0	0



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The County identified additional improvements needed for existing BMPs at a number of industrial sites, warranting the partial BMP implementation status above for the initial inspection. In the San Diego Region, housekeeping issues were noted at Quest Diagnostics - Nichols Institute at the time of inspection. The County inspector directed the facility to implement proper corrective measures for full BMP implementation. Similar housekeeping issues were noted at the South Orange County Wastewater Authority (SOCWA) plant in the Aliso Creek watershed. Corrections were made and documentation was submitted to the County.

In the Santa Ana Region, the County identified four sites as having partial BMP implementation during their routine inspection. Only one of the four inspected facilities warranted a follow-up inspection. All deficiencies were addressed and corrected either on the day of inspection or at time of follow-up inspection.

C-9.2.8 Enforcement

The County's Authorized Inspectors (identified in **Section C-10** of this PEA) undertake enforcement activities against industrial facilities according to County Water Quality Ordinances and the accompanying Enforcement Consistency Guide (**Exhibit 4.I** of the **2003 DAMP**).

Enforcement may be handled administratively or in more serious instances, through legal prosecution. As provided for in the Enforcement Consistency Guide, when selecting enforcement options, the County's inspectors ensure that violations of a comparable nature are subjected to similar types of enforcement remedies. More severe enforcement options may be selected when a violator has a history of deficiencies, has failed to take good faith actions to eliminate continuing violations, and/or has not met a previously imposed schedule for addressing violations.

2013-14 Summary of Enforcement Actions for Industrial Facilities

Number of Notices of Non-Compliance Issued	Number of Administrative Compliance Orders Issued	Number of Cease & Desist Orders Issued	Number of Facilities Referred for Criminal Remedies
0	0	0	0

The County observed no violations of County Water Quality Ordinances during the reporting period from its industrial facility inventory. As indicated in **Section C-9.2.7**, only housekeeping issues were noted at Quest Diagnostics - Nichols Institute and the SOCWA plant industrial facilities and corrections were subsequently made to ensure BMPs are being fully implemented. The County will continue to monitor these facilities during the 2014-15 reporting period.



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C-9.2.9 Reporting

For facilities that pose an imminent threat to human health or the environment, the County provides oral or e-mail notification to the Regional Board within 24 hours. Following initial 24 hour notification, the County sends a written report within 5 days detailing the nature of the threat and any corrective action taken. In addition, the County provides quarterly updates to the Santa Ana Regional Board regarding stormwater information gathered during site inspections of industrial facilities that are, or should be, regulated by the Industrial General Permit.

During the 2013-14 reporting period, the County identified no incidents during industrial inspection activities within its inventory that required notification of the Regional Boards due to an imminent threat to human health or the environment. Reporting of enforcement actions and related issues are discussed in **Section C-9.2.8**.

C-9.2.10 Training

Training and outreach for the Industrial Program is done concurrently with the Commercial Program. These efforts are summarized in **Section C-9.3.9**.

C-9.3 Commercial Program (LIP Section A-9.2)

C-9.3.1 Organization Chart

Figure A-9.1 of the LIP provides an organizational chart that identifies which County Departments are responsible for overseeing, implementing, and enforcing the Commercial Program.

C-9.3.2 Inventory

The County has developed a watershed based inventory of specific commercial sites/sources within its jurisdiction as required by the Fourth Term Permits. This inventory is updated on an ongoing basis (quarterly at minimum) and includes relevant information on ownership, size, location, etc. of commercial facilities in the unincorporated areas. Summaries of the commercial inventory are provided below in the following tables:

2013-14 Commercial Site/Source Inventory Summary



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Commercial Site/Source (by Permit Category)	Santa Ana Region (By Watershed)				San Diego Region (By Watershed)				Totals
	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbour	Santa Ana River	Newport Bay	Aliso Creek	Laguna Coast	San Juan Creek	Dana Point Coastal Streams	
Transport, storage or transfer of pre-production plastic pellets	0	0	0	0	0	0	0	0	0
Automobile mechanical repair, maintenance, fueling, or cleaning	4	28	2	0	0	0	4	0	38
Airplane repair, maintenance, fueling, or cleaning	0	0	0	0	0	0	0	0	0
Boat repair, maintenance, fueling, or cleaning	0	0	0	0	0	0	0	0	0
Equipment repair, maintenance, fueling, or cleaning	0	0	0	0	0	0	0	0	0
Automobile and other vehicle body repair or painting	0	5	0	0	0	0	0	0	5
Mobile automobile or other vehicle washing	0	0	0	0	0	0	0	0	0
Automobile (or other vehicle) impound, parking lots, and storage facilities	0	7	2	0	0	0	0	0	9
Retail or Wholesale Fueling	0	0	0	0	0	0	0	0	0
Pest control services and service facilities	0	0	0	0	0	0	0	0	0
Eating or drinking establishments, including food markets and restaurants* (Food Facilities)	6	6	10	38	2	0	41	18	121



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Commercial Site/Source (by Permit Category)	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbour	Santa Ana River	Newport Bay	Aliso Creek	Laguna Coast	San Juan Creek	Dana Point Coastal Streams	Totals
Public School Eating or Drinking Facilities (Non-commercial)++	0	0	0	2	0	1	3	0	6
Mobile carpet, drape, or furniture cleaning	0	0	0	0	0	0	0	0	0
Cement mixing or cutting	0	0	0	0	0	0	0	0	0
Mobile high pressure or steam cleaning	0	0	0	0	0	0	0	0	0
Masonry	0	0	0	0	0	0	0	0	0
Painting and coating	0	0	0	0	0	0	0	0	0
Botanical or zoological gardens and exhibits	0	0	0	0	1	0	0	0	1
Landscaping (and Hardscape Installations)	1	0	1	0	0	0	0	0	2
Nurseries and greenhouses	1	1	3	0	0	0	5	0	10
Golf courses, parks and other recreational areas/facilities	0	2	3	1	1	2	33	0	42
Cemeteries	0	0	0	0	0	0	0	0	0
Pool, lake and fountain cleaning	0	0	0	0	0	0	0	0	0
Marinas	0	0	0	0	0	0	0	0	0
Portable sanitary service facilities	0	0	0	0	0	0	0	0	0
Building material retailers and storage	0	2	0	0	0	0	0	0	2
Animal facilities (includes animal facilities such as petting zoos and boarding and training facilities)	0	3	5	1	0	0	3	0	12
Mobile pet services	0	0	0	0	0	0	0	0	0
Power washing services	0	0	0	0	0	0	0	0	0



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Commercial Site/Source (by Permit Category)	San Gabriel River/Coyote Creek	Anaheim Bay/Huntington Harbour	Santa Ana River	Newport Bay	Aliso Creek	Laguna Coast	San Juan Creek	Dana Point Coastal Streams	Totals
Other commercial sites/sources determined to be significant contributors of pollutants to the MS4, or with a history of unauthorized discharges	0	1	5	0	0	0	0	0	6
Facilities tributary to 303(d) water body for pollutant generated on-site	0	0	0	0	1**	0	0	0	1
Facilities within/directly adjacent or discharging directly to ESA	0	0	0	0	0	0	0	45***	45
Sites and sources tributary to and within 500 feet of ASBS	0	0	0	0	0	0	0	0	0
Total for all Categories	12	55	31	42	5	3	89	63	300

Notes: * This list is for solely Eating or Drinking Establishments. If a commercial site primarily falls into another inventoried category and happens to have a secondary food facility on-site, this facility is inventoried in its primary category. An example would be a golf course with a snack shop, which is inventoried as a golf course. The County will still monitor the HCA's NPDES inspection results related to these secondary food facilities.

** This listing refers to the Santiago Ranch Stables leasehold upstream of Aliso Creek, which could also be considered an Animal Facility in the San Diego Region. For classification purposes, the 303(d) listing takes priority over the Animal Facilities classification.

*** These 45 listings are in reference to the Dana Point Harbor ESA. Dana Point Harbor commercial facilities that are not Eating or Drinking Establishments have other varying sub-classifications, but these sites have been inventoried as ESA priority within the County's commercial inventory. The restaurants and food facilities within Dana Point Harbor are inventoried with the Eating or Drinking Establishments.

++ In 2013-14, the County tracked NPDES inspection results provided by HCA for public school cafeterias in the unincorporated areas as part of its Existing Development Program; however, these sites are not considered commercial businesses and have been segregated from other commercial Eating or Drinking Establishments for this table. Private schools are maintained with the commercial Eating or Drinking Establishments.



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The inventory is updated on an ongoing basis within the LIP. The industrial/commercial data set is currently managed through a web-based GIS database called MS4Web (refer to the Facilities/Industrial Facilities tab), which is discussed in **Section C-9.2.2**. Many of the changes that occur to the inventory are related to businesses opening and closing in the unincorporated areas.

C-9.3.3 Prioritization

Within the Santa Ana Regional Board area, the County prioritized commercial sites/sources as high, medium, or low based on their respective threat to water quality. Eating or drinking establishments are inspected routinely by HCA, and these sites are inventoried separately from the commercial facility prioritization. The County's commercial site/source prioritization distribution by Santa Ana Region watershed is provided in the following table:

2013-14 Summary of Commercial Site/Source Distribution by Watershed

Commercial Site/Source Prioritizations by Watershed	Santa Ana Region				Totals
	San Gabriel River/Coyote Creek	Anaheim Harbor/ Huntington Harbour	Santa Ana River	Newport Bay	
Total High Priority Sites	0	7	2	1	10
Total Medium Priority Sites	3	4	10	0	17
Total Low Priority Sites	3	38	9	1	51
Subtotal of Prioritized Sites	6	49	21	2	78
Total Number of Eating or Drinking Establishments	6	6	10	40	62
Total Number of Facilities	12	55	31	42	140

Fourth Term Permit requirements in the Santa Ana Regional Board area specify that a minimum of 10% of the non-food facility commercial inventory be designated as high priority, and 20% of the non-food facility commercial inventory be prioritized as medium. As indicated in the table above, the County prioritized 10 out of 78 commercial sites as high (12.8%), 17 out of 78 commercial sites as medium (21.8%), and 51 out of 78 sites as low (65.4%). The total number of commercial facilities increased from 69 to 78 sites in the Santa Ana Regional Board area, primarily due to additional surveying and inventorying of Midway City commercial sites in 2013-14 as well as the inclusion of additional Eating or Drinking Establishments.



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Within the San Diego Regional Board area, Fourth Term Permit requirements do not specify designation of high, medium, or low categories for commercial sites/sources. Instead, the commercial sites (excluding eating or drinking establishments) are combined with the industrial inventory (14 industrial facilities) to develop an inspection frequency of at least 20% of the inventory. The County's commercial site/source distribution by San Diego Region watershed is provided in the following table:

Commercial Site/Source Distribution by Watershed (No Prioritization Required)	San Diego Region				
	Aliso Creek	Laguna Coast	San Juan Creek	Dana Point Coastal Streams	Totals
Total Commercial Sites (excluding Eating or Drinking Establishments)	3	2	45	45	95
Total Number of Eating or Drinking Establishments	2	1	44	18	65
Total Number of Facilities	5	3	89	63	160

Mobile businesses are addressed through the Countywide Mobile Business Pilot Program. Efforts of the Countywide Mobile Business Pilot Program are summarized in the 2013-14 Unified Annual Report. Additional details on the County's Mobile Business inventory and practices are included in **Section C-9.6**.

C-9.3.4 BMP Fact Sheets

As indicated in **Section C-9.2.5**, the activity-based Industrial/Commercial fact sheets developed as part of the Existing Development Program are numbered IC1 - IC24 and are included as **Exhibit A-9.II** of the County's LIP.

C-9.3.5 Inspections

The County inspects active commercial sites/sources in its inventory at the frequency shown in the following table (excluding eating or drinking establishments), which is also included in the County's LIP:



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Commercial Inspection Frequency

Priority	Santa Ana Region	San Diego Region
High	Annually - Minimum of 10%	<u>No Prioritization Required:</u> A minimum of 20% of the combined Industrial/Commercial Inventory must be inspected annually.
Medium	Biennially - Minimum of 20% (Once every 2 years)	
Low	Once Per Permit Cycle (Once every 5 years)	

The number of commercial sites/sources inspected during the 2013-14 reporting period by commercial facility type is presented in the following table:

2013-14 Jurisdictional Summary of Commercial Site/Source Inspections



Commercial Site/Source Category	Number of Sites/Sources Inspected	
	Santa Ana Region	San Diego Region
Transport, storage or transfer of pre-production plastic pellets	0	0
Automobile mechanical repair, maintenance, fueling, or cleaning	35	1
Airplane repair, maintenance, fueling, or cleaning	0	0
Boat repair, maintenance, fueling, or cleaning	0	0
Equipment repair, maintenance, fueling, or cleaning	0	0
Automobile and other vehicle body repair or painting	6	0
Mobile automobile or other vehicle washing	0	0
Automobile (or other vehicle) impound, parking lots, and storage facilities	8	0
Retail or wholesale fueling	0	0
Pest control services and service facilities	0	0



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Commercial Site/Source Category	Santa Ana Region	San Diego Region
Eating or drinking establishments, including food markets and restaurants* (Food Facilities)	30*	48*
Mobile carpet, drape, or furniture cleaning	0	0
Cement mixing or cutting	0	0
Mobile high pressure or steam cleaning	0	0
Masonry	0	0
Painting and coating	0	0
Botanical or zoological gardens and exhibits	0	1*
Landscaping (and hardscape installations)	0	0
Nurseries and greenhouses	1	0
Golf courses, parks and other recreational areas/facilities	4	7
Cemeteries	0	0
Pool, lake and fountain cleaning	0	0
Marinas	0	0
Portable sanitary service facilities	0	0
Building material retailers and storage	2	0
Animal Facilities (includes animal facilities such as petting zoos and boarding and training facilities)	5	0
Mobile pet services	0	0
Power washing services	0	0
Other commercial sites/sources determined to be significant contributors of pollutants to the MS4, or with a history of unauthorized discharges	6	0
Facilities tributary to 303(d) water body for pollutant generated on site	0	0



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Commercial Site/Source Category	Santa Ana Region	San Diego Region
Facilities within/directly adjacent or discharging directly to ESA (San Diego Region/Dana Point Harbor Commercial Sites)	0	31
Sites and sources tributary to and within 500 feet of ASBS	0	0
Industrial Facility Inspection Totals (San Diego Region)	N/A	12
Subtotal of Required Inspections Completed (Excluding Eating or Drinking Establishments)	67	51**
Total Inventory (Excluding Eating or Drinking Establishments)	78	109

*HCA provides annual NPDES commercial inspection services for Eating or Drinking Establishments countywide and maintains records associated with the inspection totals and results. Both the Santa Ana and San Diego Region Fourth Term Permits require Permittees to exclude these HCA inspections from determining the entire total of commercial NPDES inspections.

**Combination of 12 industrial and 39 commercial inspections per San Diego Region requirements.

The results tabulated above indicate that the County conducted 67 commercial inspections out of a possible 78 facilities in the Santa Ana Regional Board area (excluding Eating or Drinking Establishments) during the 2013-14 reporting period. These 67 commercial inspections included all 10 high priority sites, 6 medium priority facilities, and 51 low priority sites. This represents full completion of the necessary high and medium priority inspections for year four of the Fourth Term Permit in the Santa Ana Regional Board area.

Within the San Diego Regional Board area, the County conducted 39 commercial site inspections within the 2013-14 reporting period. By combining these 39 commercial inspections with the 12 industrial inspections, a total of 51 inspections were conducted out of a combined commercial/industrial inventory of 109 facilities (excluding Eating or Drinking Establishments from this calculation). Based on these totals, a total of 46.7% of the inventory was inspected, which exceeds the Fourth Term Permit requirement of 20%. This number is higher than required in part because the County incorporates annual NPDES commercial inspections as part of the lease agreement inspections for facilities within Dana Point Harbor.

The following table summarizes the percent of required inspections completed by the County for the 2013-14 reporting period:



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2013-14 Commercial Inspection Frequency Percent Completed*

Priority	Santa Ana Region	San Diego Region
High	100%**	46.7%***
Medium	35.3%**	
Low	96.2%	

* Excludes Eating or Drinking Establishments

** The Fourth Term Permit's annual requirement is to inspect 100% of high priority commercial facilities within the Santa Ana Regional Board area.

*** The Fourth Term Permit's annual requirement is to inspect at least 20% of the combined commercial/industrial inventory in the San Diego Regional Board area, with no prioritization required.

The County tracks commercial facilities that warrant additional investigation due to BMP deficiencies or other issues observed during the initial commercial facility inspection. This includes NPDES observations noted by HCA during inspections of Eating or Drinking Establishments in the County's unincorporated jurisdiction. The number of commercial sites/sources that warranted additional investigation in 2013-14, including Eating or Drinking Establishments, is presented below along with data on follow-up actions taken. The total number of commercial program inspections for 2013-14 is 196, which is calculated by adding the total number of Eating or Drinking Establishments inspections from each region (30 and 48, respectively) to the subtotal of required commercial inspections completed for non-food facilities (67 and 51 respectively). Certain Eating or Drinking Establishments were inspected multiple times by County/HCA staff during the 2013-14 permit year, and the following table includes results from these multiple inspections.

Summary of Additional Investigations by Watershed



Watershed	Number of Commercial Sites/Sources that Warranted Additional Investigation after Initial Inspection		
	2013-14	2012-13	2011-12
Aliso Creek	0	1	0
Dana Point Coastal Streams	5	4	8
San Juan Creek	16	20	32
Anaheim Bay/ Huntington Harbor	6	7	5
Newport Bay	3	5	3
San Gabriel River / Coyote Creek	1	0	0



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Watershed	2013-14	2012-13	2011-12
Santa Ana River	2	5	5
Totals	33	42	54
Percentage of Commercial Sites/Sources Inspections that Warranted Additional Investigation after Initial Inspection			
2013-14	2012-13	2011-12	
17 % (33 of 196 inspections)	20% (42 of 210 inspections)	34% (54 of 160 inspections)	

Watershed	Number of Commercial Sites/Sources with Follow-Up Action and/or Re-Inspection		
	2013-14	2012-13	2011-12
Aliso Creek	1	0	0
Dana Point Coastal Streams	5	4	6
San Juan Creek	2	8	28
Anaheim Bay / Huntington Harbor	8	4	5
Newport Bay	1	3	2
San Gabriel River / Coyote Creek	1	0	0
Santa Ana River	2	4	4
Totals	20*	23	45**
Percentage of Commercial Sites/Sources with Follow-Up Action or Re-Inspection Due to Initial Deficiencies			
2013-14	2012-13	2011-12	
60.6%*	11%*	28.1%**	

*This total reflects that 20 out of 33 observed sites with initial deficiencies on the commercial inspections resulted in further action such as re-inspection. The remaining 13 sites represent duplications from multiple HCA inspections during 2013-14 with one follow up response, sites where a follow-up NPDES inspection by HCA did not identify a deficiency for the facility, or where a follow up response is pending in 2013-14. The percentage shown indicates 20 out of 196 total inspections (5.1%) resulted in a follow up action and/or re-inspection during 2013-14.

**Historically, this PEA table has focused on re-inspection totals, which shows a lower percentage response. Since the County utilizes multiple approaches to follow-up with commercial sites with deficiencies, this table has been updated since 2011-12 to reflect all follow-up actions by the County. Additional details on these types of follow-up actions are below.



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The percentage of commercial sites warranting additional investigation based on the initial inspection was 17% (33 of 196 inspections) in the 2013-14 reporting period, which is lower than both the 20% noted for 2012-13 (42 of 210 inspections) and 34% noted in 2011-12 (54 of 160 inspections). As with previous years, the majority of these issues were observed at Eating or Drinking Establishments in commercial shopping centers primarily related to the housekeeping of the refuse containers/trash bin areas or a lack of grease maintenance records being available for the HCA inspector. The County coordinates responses on these food facilities through the following mechanisms (not all responses require follow-up field inspection to resolve the issue):

- Many of the businesses listed above are Eating or Drinking Establishments that receive NPDES deficiencies from HCA for failing to properly manage their trash bins/refuse containers. A typical follow-up response to this type of deficiency may include a re-inspection of the food facility with the business owner and/or property manager for the commercial center. Since many of these Eating or Drinking Establishments share a common dumpster with other commercial retail businesses, the County has learned that a highly effective means of addressing the issue is to work with the property management company in addition to the individual food facility manager to resolve potential deficiencies.
- In other instances, a lack of grease records may be noted by the HCA inspector. In these cases, the County sends a letter to the site requesting that records be maintained and made available during inspections. In certain cases, verification of the records is requested from the business owner.
- For circumstances involving an illegal discharge from a food facility, such as washing down materials into the storm drain system, the County typically conducts follow-up inspections of the commercial facility to ensure proper BMP implementation.
- Deficiencies at leased commercial sites within Dana Point Harbor are referred to Dana Point Harbor Department inspectors, who enforce on these issues as part of the County's lease agreements with the tenants.
- In certain cases, an enforcement action is needed to address violations of the County and/or OCFCD Water Quality Ordinance. Enforcement actions completed in 2013-14 are summarized in **Section C-9.3.7**.

C-9.3.6 BMP Implementation

As part of commercial facility inspections, the County inspectors determine the level of BMP implementation and also assess the effectiveness of the implemented BMPs. The inspector may encounter situations where BMPs are in place but are not effectively applied. The inspectors are trained to use their best professional judgment and decide how much time to allow the owner/operator to correct the issue. A summary of BMP implementation based on County inspections (including Eating or Drinking establishments) is provided below.

The 2013-14 reporting year had a number of Eating or Drinking Establishments with multiple inspections. Based on these results and for purposes of the following table, a commercial site



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was only granted full BMP implementation if it received no deficiencies for the entire reporting period. Sites that received one or more BMP deficiencies were identified as partial BMP implementation for the reporting period.

2013-14 Watershed Summary of BMP Implementation at Commercial Sites



Watershed	Number of Facilities with BMPs Fully Implemented	Number of Facilities with BMPs Partially Implemented	Number of Facilities With No BMPs or BMPs Not Fully Implemented	Number of Facilities Required to Implement or Upgrade/Modify BMPs
Aliso Creek	3	0	0	0
Laguna Coastal Streams	0	0	0	0
Dana Point Coastal Streams*	44	5*	0	5
San Juan Creek	19	16**	0	9
Anaheim Bay/Huntington Harbour	49	6**	0	9
Newport Bay	14	3**	0	3
San Gabriel River/Coyote Creek	6	1**	0	1
Santa Ana River	17	2**	0	2
Totals	152	33	0	29
Percentage of Facilities Required to Implement or Upgrade/Modify BMPs				
2013-14	2012-13		2011-12	
19% (29 out of 152 sites inspected)	12.5% (22 out of 175 sites inspected)		26%	

*HCA deficiencies at Dana Point Harbor Eating or Drinking Establishments are reported to Dana Point Harbor Department for follow-up. These businesses are routinely inspected for a variety of issues (including NPDES) by staff as part of their ongoing leases.

**The County conducted follow-up investigations related to commercial sites with partial BMP investigation (primarily HCA Eating or Drinking Establishment inspection deficiencies). Some investigations are ongoing issues that remain pending.

C-9.3.7 Enforcement

The County's Authorized Inspectors (identified in **Section C-10** of this PEA) undertake enforcement activities according to County Water Quality Ordinances and the accompanying Enforcement Consistency Guide. The enforcement mechanisms available are summarized in



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this section and detailed in the County’s LIP. Water pollution enforcement may be handled administratively, or, in more serious instances, be prepared for criminal prosecution. As provided for in the Enforcement Consistency Guide (**Exhibit 4.I** of the **2003 DAMP**), when selecting enforcement options, the County’s Authorized Inspectors ensure that violations of a similar nature are subjected to similar types of enforcement remedies. More severe enforcement options may be selected when a violator has a history of deficiencies, has failed to take good faith actions to eliminate continuing violations, and/or has not met a previously imposed schedule for addressing violations.

During the 2013-14 reporting period, the County took the following enforcement actions against commercial sites/sources within its inventory:

2013-14 Summary of Enforcement Actions



Watershed	Number of Educational Letters Sent	Number of Notices of Non-Compliance Issued	Number of Administrative Compliance Orders Issued	Number of Facilities Referred for Criminal Remedies
Aliso Creek	0	0	0	0
Laguna Coastal Streams	0	0	0	0
Dana Point Coastal Streams	0	0	0	0
San Juan Creek	0	0	2	0
Anaheim Bay/ Huntington Harbor	0	1	0	0
Newport Bay	0	0	0	0
San Gabriel River/ Coyote Creek	0	0	0	0
Santa Ana River	0	0	1	0
Totals	0	1	3	0

The County has transitioned to a standard “Records” enforcement/educational letter when a lack of grease interceptor maintenance records is the only issue identified at a restaurant. The County has found that this enforcement action has resulted in better upkeep of maintenance records (Level 3 Outcome) which translates to less potential for the grease interceptors to become a source of pollutants (potential Level 4 Outcome). The Notice of Non Compliance issued during the 2013-14 reporting period was related to a prohibited discharge at Baladi Poultry in Midway City. The County inspector observed evidence of residues in the public street. The County will conduct additional follow up in 2014-15.



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The three Administrative Compliance Order forms issued during the 2013-14 reporting period were related to evidence of a prohibited discharge, the presence of an illicit connection, or uncontrolled litter and debris observed at the time of inspections. The facilities in violation were Action Recycling (City of Orange), Las Flores Hand Car Wash (Rancho Santa Margarita), and Coto de Caza Golf & Racquet Club (Coto de Caza). Corrective actions were taken by all of the facilities in question.

C-9.3.8 Reporting

For facilities that pose an imminent threat to human health or the environment, the County provides oral or e-mail notification to the Regional Board within 24 hours. Following initial 24 hour notification, the County sends a written report within 5 days detailing the nature of the threat and any corrective action taken.

During the 2013-14 reporting period, the County identified no incidents during commercial inspection activities within its inventory that required notification of the Regional Boards due to an imminent threat to human health or the environment.

C-9.3.9 Training and Outreach

Training



The County as Principal Permittee sponsored training to assist municipal staff in understanding the industrial and commercial components of the Existing Development Program. County Authorized Inspector participation in training conducted during the reporting period is summarized in **Section C-10.5** of this PEA.

Outreach

The County continued to conduct outreach activities with industrial and commercial businesses within its jurisdiction to inform them of their responsibilities under this program. During the 2013-14 reporting period, this outreach effort included:

- Distribution of brochures, posters and the industrial/commercial BMP fact sheets through the website, field inspectors, at public facilities counters, etc.
- Posting information on the Existing Development Program (including the activity-based BMP fact sheets) on the County's website, www.ocwatersheds.com.

C-9.4 Residential Program (LIP Section A-9.3)

C-9.4.1 Organization Chart

Through its organization chart, **Figure A-9.2** of the LIP, the County identified which Departments are responsible for the implementation of the Residential Program.



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C-9.4.2 Inventory

The County maintains a watershed-based map of residential areas within its jurisdiction, including using the GIS capabilities of the online MS4Web database as well as other GIS tools. Residential areas that discharge directly to an ESA may be targeted for enhanced implementation of BMPs based on the activities of concern that are identified. Additional information on this is included in **Section C-9.5.2**.

C-9.4.3 BMP Fact Sheets

BMP fact sheets have been developed as a part of the Existing Development Program. The fact sheets include a description of specific BMPs for high threat residential activities that may cause the discharge of pollutants and provide a focus on the pollution prevention measures that the facility should implement. The activity-based residential fact sheets are numbered R1 – R8 and are included as **Exhibit A-9.II** of the County's LIP. There were no modifications to the fact sheets during the reporting period.

The County has identified the following potential areas and activities that pose a high threat to water quality and/or potential sources of pollutants by following the procedure outlined in **DAMP Section 9.5.2**.

- Residential automobile repair, maintenance, washing, and parking;
- Home and garden care activities and product use (including the use and disposal of pesticides, herbicides, and fertilizers);
- Collection and disposal of trash, pet waste, green waste, and household hazardous waste (e.g., paints, household cleaning products);
- Any other residential source that the County determines may contribute a significant pollutant load to the MS4;
- Any residential areas tributary to a CWA section 303(d) impaired water body, where the residence generates pollutants for which the water body is impaired; and
- Any residential areas within or directly adjacent to or discharging directly to a coastal lagoon, the ocean, or other receiving waters within an environmentally sensitive area.

These residential activities are assumed to occur with equal likelihood in all residential areas within the County's jurisdiction. The implementation of the Residential Program is designed to address these activities on a countywide basis.



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C-9.4.4 Enhanced Implementation

With the continued implementation of the NALs reconnaissance monitoring program in the San Diego Region during 2013-14, the County has focused on pollutants within primarily residential (and CIA/HOA) sub-watersheds of Coto de Caza and Ladera Ranch. Details on the NALs program can be found in **Sections C-10, Attachment C-10.1** and **C-11** of this PEA.

C-9.4.5 Water Pollution Complaints/Incidents

The Residential Program relies upon observations by municipal employees working in or assigned to residential areas and on complaints received from the public through the water pollution problem reporting hotline and website.

The County tracks water pollution complaints under the ID/IC program and provides a summary of the number of complaints received, including residential runoff enforcement actions, and the source area associated with the complaint (e.g. commercial business, resident, etc.). These incidents are maintained in the County's MS4Web database. Additional information on residential enforcement is provided as part of **Section C-10** of this PEA.

C-9.4.6 Enforcement

Enforcement actions taken by the County throughout its jurisdiction, including those against individual residents, are summarized in **Section C-10** of this PEA.

C-9.4.7 Outreach and Training

Outreach

Education and outreach targeted towards residents is a major component of the Residential Program. The County encourages the implementation of a set of designated BMPs for residents. The BMPs are presented in a series of fact sheets specific to high threat residential activities. The County has developed outreach efforts to encourage the use of the designated BMPs. This outreach has included efforts such as mass media advertising campaigns, mailings, holding workshops, development and distribution of brochures, posters, fact sheets, posting information on the County's webpage, etc. Information on specific outreach efforts can be referenced in **Section C-6**.

Training

Successful implementation of the residential program relies on education of municipal employees that conduct activities in residential areas. For the County, it is primarily OC Public Works/Operations & Maintenance field program crews who are entering into residential areas on a routine basis to maintain the public infrastructure. Training efforts during the 2013-14 reporting period covering municipal activities are discussed in **Section C-5** of this PEA. While many of the field programs conducted by the County are inherently pollution prevention practices (such as street sweeping and drainage facility cleaning), the field program crews are



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trained to notify the County's Authorized Inspectors (identified in **Section C-10**) of any issues impacting or having the potential to impact runoff from residential areas.

C-9.5 CIA/HOA Program (LIP Section A-9.4)

C-9.5.1 Organization Chart

The County utilizes the LIP residential organization chart (**Figure A-9.2**) and **Section A.6** of the LIP to implement its CIA/HOA Program.

C-9.5.2 Inventory

As part of its LIP, the County has expanded its use of GIS mapping to facilitate various components of the Existing Development program, including utilizing watershed-based mapping of residential and CIA/HOA areas within its jurisdiction. Residential communities that discharge directly to an ESA may be targeted for enhanced implementation of BMPs based on the activities of concern that are identified. In addition, the GIS mapping has been essential to responding to complaints or reported ID/IC issues within the unincorporated CIA/HOA areas. The GIS mapping and inventorying of residential and CIA/HOA communities has also been incorporated into post-construction BMP verification activities, which are discussed in **Section 9.7** below.

C-9.5.3 BMP Fact Sheets

BMP fact sheets have been developed as part of the Existing Development program. The fact sheets include a description of specific BMPs for high threat CIA/HOA activities that may discharge pollutants and provide a focus on the pollution prevention measures that the community or facility should implement. The activity based fact sheets that were developed are included in **Exhibit A-9.II** of the County's LIP.

C-9.5.4 Enforcement Actions

Enforcement actions conducted by the County throughout its jurisdiction, including CIA/HOA areas, are summarized in **Section C-10** of this PEA.

C-9.5.5 Outreach and Training

Outreach

As described in **Section C-9.4.7**, there are a number of ways in which the County performs general outreach to residents. CIA/HOA communities present a tremendous opportunity for outreach due to their organizational structure, and the County encourages and promotes distribution of stormwater education material through association newsletters, association websites, etc.



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In addition to this outreach, the County interacts with multiple CIA/HOA entities through other relevant Existing Development programs. These interactions included direct inspections of CIA/HOA managed facilities such as commercial parks and common recreational areas within CIA/HOA authority as part of the NALs and commercial inspection programs. As part of these inspections, landscape/maintenance contractors for the HOAs were invited to present their on-site maintenance and irrigation practices, and associated BMP information was provided by the County to help manage runoff and stormwater pollution. The following HOAs were included in this outreach effort in 2013-14:

- LARMAC (Ladera Ranch)
- CZ Master Association (Coto de Caza)
- Westar Associates (Ladera Ranch)

In addition to utilizing commercial inspections, the post construction BMP verification program has provided another potential pathway for outreach to CIA/HOA communities that have WQMP(s) for prior development or redevelopment projects without an inventoried commercial or recreational facility. The County plans to research ways to coordinate additional outreach concurrently with the post construction BMP verification program.

The CIA/HOA outreach also uses similar outreach techniques to the residential program such as mass media advertising, which is discussed in **Section 9.4.7**.

C-9.6 Mobile Business Program

The model Mobile Business Pilot Program was developed in 2009-10 by the Orange County Stormwater Program as part of the Fourth Term Permit implementation in both regions. The Mobile Business Pilot Program subsequently commenced in 2010-11 with the development of an online, countywide inventory and enforcement database that contains mobile business inventories for each jurisdiction in Orange County. Along with other city jurisdictions, the County supplied a list of mobile businesses for a variety of mobile business categories that are based and/or operating within its unincorporated area to initially populate the County's portion of the database. These included 59 mobile businesses based in its home unincorporated jurisdiction and 78 mobile businesses that operate in the unincorporated areas. The overall progress for the Mobile Business Program was reported in **Section 3.6** of the ROWDs submitted to the Santa Ana and San Diego Regional Boards as well as **Section C-9.0** of the Unified PEA.

The County continues to update its mobile business inventory on an ongoing basis. New mobile businesses are identified through a variety of means including public outreach, complaint response, inquiries from mobile businesses on BMP requirements, and coordination with cities and regulatory agencies.

C-9.7 Post-Construction BMP Inspection and Verification for Existing Development

The County's WQMP inventory is updated on an ongoing basis and made available to the Regional Boards for review. **Section C-7** of this PEA contains a summary of newly approved



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WQMPs approved during the 2013-14 reporting period for proposed new development and redevelopment. This section discusses the post construction BMP inventory and verification inspections conducted in 2013-14 for historically approved WQMPs that are in a post construction phase.

The 2013-14 inventory includes private sector industrial, commercial, residential, and CIA/HOA sites with approved WQMPs. In addition, the inventory also includes municipal facilities and public capital improvement projects with approved WQMPs and post-construction BMPs that warrant inventory and inspection under this program. The County's WQMP inventory and inspection information is managed through an online web-based database with Geographical Information System (GIS) capabilities called MS4Web, and the inventory is routinely checked and updated as new WQMPs are provided by the County's OC Planning Division. The County's WQMP inventory and post-construction BMP inspection/verification data is made available through the following web links, which are updated on an ongoing basis:

Website (WQMPs): <http://www.ms4web.com/base/wbin/Structures.aspx?ns=36>

User Name: PEA

Password: ocMS4!

For private property WQMPs, the County retained an environmental engineering consultant, RBF Consulting, to assist with post construction BMP verifications in 2013-14. The following WQMP assessments were conducted in the unincorporated County inventory:

- A total of 6 Santa Ana Regional Board area private property WQMPs were completed with structural treatment control BMPs since Fourth Term Permit implementation in 2009. Based on the information obtained, one of the six projects was not constructed and appeared to be abandoned. The other five projects were determined to have been constructed. Post construction BMPs were inspected at three of the locations in 2014. The other two were non-responsive to verification requests. The County will look to utilize alternative property owner self-certification verification for these sites during the 2014-15 reporting period.
- A total of 83 San Diego Regional Board area private property WQMPs were developed since 2001. These include WQMPs completed for LARMAC in Ladera Ranch (34), Ladera Ranch Sub-HOAs (12), and miscellaneous San Diego Regional Board area unincorporated sites (37). A total of 61 of the 89 WQMP sites were inspected, including all 46 sites in various portions of Ladera Ranch. Of the remaining 27 WQMPs in the current inventory, the majority of the projects were determined to be either on hold, cancelled, still in the planning stages, or still under construction. A select few of these WQMPs evaluated involved individual home owners (approximately 6 in the San Diego Region) that were uncooperative or non-responsive to the 2013-14 verification requests. RBF Consulting staff conducted drive by inspections of these sites, and the County will look to utilize alternative property owner self-certification verification during the 2014-15 reporting period.



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- As part of the BMP implementation task for industrial and commercial sites, the County incorporated WQMP verification inspections along with industrial/commercial inspections where feasible as part of its Existing Development component.
- The County oversees large scale development projects in communities such as Tonner Hills and Newport Coast. These developments generate WQMPs that are ultimately transferred to the Cities of Brea and Newport Beach upon completion of construction and property annexation. No transfers of WQMP documents were conducted in 2013-14; however, the County will be reevaluating its database in 2014-15.

The County conducted multiple post construction WQMP verifications and inspections at public capital improvement projects in 2013-14 encompassing the following departments:

- OC Public Works (33 priority and non-priority projects countywide)
- OC Parks (6 non-priority projects countywide)
- Orange County Sheriff's Department (1 priority project, Santa Ana Region)
- HCA (1 priority project, Santa Ana Region)
- John Wayne Airport (5 priority projects, Santa Ana Region)
- Probation Department (3 priority and non-priority projects countywide)
- OC Public Libraries (3 priority and non-priority projects countywide)
- OC Animal Care (1 priority project, Santa Ana Region)
- OC Waste & Recycling (2 priority project, San Diego Region)

For public projects with missing BMPs or BMPs requiring maintenance, the County will notify the department of the deficiency and request correction. For private property WQMPs with BMP deficiencies, the County will utilize the inspection program and/or its Water Quality Ordinance as appropriate to ensure that post construction BMPs are properly implemented and maintained by the private landowners. Follow up verification work remains ongoing into the 2014-15 reporting period.

C-9.8 Existing Development Program Modifications

The County has evaluated the Existing Development Program to determine if modifications are necessary. With the adoption of the Fourth Term Permits in each region, multiple changes to the Existing Development Program were carried out to achieve full program implementation. As a split jurisdiction, the specific Existing Development Program requirements have become more divergent in the Fourth Term Permits between the Santa Ana and San Diego regions. Therefore, the County has separated its Santa Ana and San Diego region inventories and manages them independently of each other.

On October 3, 2013, the County of Orange, Orange County Flood Control District and Santa Ana Region Permittees submitted the Report of Waste Discharge (ROWD) to both the US EPA and Santa Ana Regional Water Quality Control Board pursuant to the requirements of Section XXIII of Order No. R8-2009-0030 NPDES No. CAS618030. On May 20, 2014, the County of Orange, Orange County Flood Control District and San Diego Region Permittees submitted the



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Report of Waste Discharge (ROWD) to both the US EPA and San Diego Regional Water Quality Control Board pursuant to the requirements of Section K.2.b of Order No. R9-2009-0002 NPDES No. CAS0108740. Both the Santa Ana Region and San Diego Region ROWDs presented specific recommendations for the continuation and future development of the Orange County Stormwater Program based upon a consideration of the effectiveness of the Program and need for additional pollutant control initiatives.

The recommendations for Existing Development program modifications provided in **Section 3.6** of the Santa Ana ROWD are summarized as follows:

- The commercial site inventory list should be minimally modified to align with the commercial inventory requirements in the current San Diego Region permit.
- The new permit should allow two options for industrial and commercial facility inspections - Option 1 would consist of a targeted approach, with inspection frequency based on prioritization; Option 2 would consist of a synoptic approach, with no fluctuation in inspection frequency from year to year.

The recommendations for Existing Development program modifications provided in **Section 3.6** of the Santa Diego Region ROWD are summarized as follows:

- Consider incorporating the updated CASQA BMP fact Sheets into the Existing Development Model Program,