

SECTION C-10

ILLEGAL DISCHARGES/ILLICIT CONNECTIONS

**PROGRAM EFFECTIVENESS ASSESSMENT
2013-14**



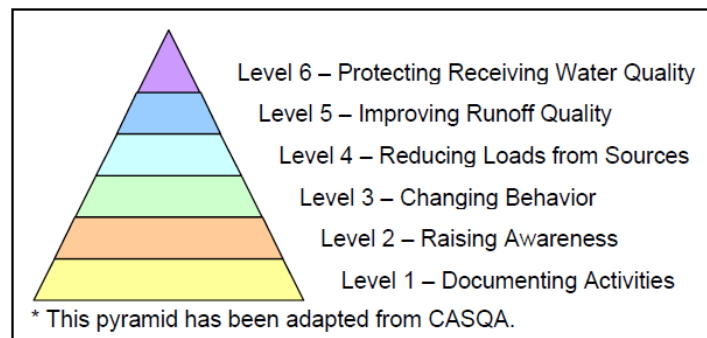


C-10.0 ILLEGAL DISCHARGES/ILLICIT CONNECTIONS (ID/ICs)

C-10.1 Introduction (LIP Section A-10.1)

ID/ICs can be a significant source of pollutants to the MS4. Consequently, the County's LIP includes a comprehensive program for detecting, responding to, investigating and eliminating these types of discharges/connections in an efficient and timely manner.

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.



C-10.2 Illegal Discharges

C-10.2.1 Organization Chart

Through an organization chart, **Figure A-10.1** of the LIP, the County has identified which Departments are responsible for the implementation of the ID/ICs Program.

C-10.2.2 Authorized Inspector Designations

The County's legal authority for addressing ID/ICs is established through the Water Quality Ordinances, which is discussed in detail in **Section C-4.0**. The County's LIP, Water Quality Ordinances, and Enforcement Consistency Guide (**Exhibit 4.I of the 2003 DAMP**) define Authorized Water Quality Ordinance Inspectors (Authorized Inspectors) as those persons designated by the Director of OC Public Works (and Director, John Wayne Airport for County Ordinance) to investigate compliance with, detect violations of, and take actions pursuant to the County and Orange County Flood Control District Water Quality Ordinances.

A list of County Authorized Inspectors and relevant contact information is provided in the following table:



2003-14 List of County Authorized Inspectors

Name	Department	E-mail Address	Phone Number
Duc Nguyen	OC Public Works, OC Environmental Resources	Duc.Nguyen@ocpw.ocgov.com	(714) 955-0676
James Fortuna		James.Fortuna@ocpw.ocgov.com	(714) 955-0680
Jian Peng		Jian.Peng@ocpw.ocgov.com	(714) 955-0650
Kacen Clapper		Kacen.Clapper@ocpw.ocgov.com	(714) 955-0677
Richard Boon		Richard.Boon@ocpw.ocgov.com	(714) 955-0670

C-10.2.3 Detection of Illegal Discharges and Illicit Connections

The County has a number of programs that proactively facilitate the detection of existing and/or potential sources of ID/ICs including the following:

- Municipal Activities (Section A-5 of LIP) – OC Public Works Operations and Maintenance staff are trained to assist in the identification of ID/ICs during their daily activities inspecting/repairing/maintaining public infrastructure throughout the County’s jurisdiction. OC Public Works Operations and Maintenance staff is trained to refer water quality problems to the County’s Authorized Inspectors.
- New Development/Significant Redevelopment Program (Section A-7 of LIP) – The inspection of projects with approved Project WQMPs assists with the identification of site-specific post-construction structural BMPs that are either not functioning adequately or are not being maintained properly.
- Construction Activities (Section A-8 of LIP) – County building, grading and public works construction inspectors are trained to assist with the identification of ID/ICs from construction sites.
- Existing Development Programs (Section A-9 of LIP) – County Authorized Inspectors perform inspections to assess BMP implementation at industrial and commercial businesses. Conditions that pose a threat to water quality are immediately addressed.
- Water Quality Monitoring Program (Section A-11 of LIP) – The collection of water quality monitoring data for various monitoring program elements (e.g. Dry Weather Monitoring, wet weather Stormwater Action Level or dry weather Numeric Action Level) assists in identifying problem areas. As monitoring staff collect samples, any irregular or abnormal conditions detected through field observations and/or measurements may be reported for initiation of ID/IC source investigation efforts.

C-10.2.4 Water Pollution Reports/Complaints/Notifications

In addition to the County’s proactive programs to detect ID/ICs, another element to a successful ID/IC program is public reporting. The County provides several means for the public to report information about potential or existing problems so that they can be mitigated



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as quickly as possible. The County has established a countywide 24 hour, bilingual (English/Spanish), toll-free water pollution complaint hotline (1-877-89SPILL) to receive water pollution complaints and other related information. Reports, complaints and notifications are also received through a website reporting form on the County's website, at <http://ocwatersheds.com/wphotline/>.

In addition, as discussed in **Section C-6.0** of this PEA, the County has developed and implemented an application to assist iPhone and Android users in reporting water pollution issues as well as other public works maintenance problems. Users can download this free application by searching the term "OC Works". iPhone and iPad users can click the following link: <http://itunes.apple.com/us/app/oc-works/id506793584?mt=8>



With this OC Works Application, users can easily report incidents of alleged illegal dumping, water pollution, property violations as well as other stormdrain and infrastructure issues directly to County staff. The application will ask the user to confirm the location of the pollution issue and the stormdrain repair or service need by GPS, which assists County staff in locating the specific area and providing more immediate service. Photos of the issue can also be uploaded to assist in an expedited response.

A summary of the sources of all water pollution reports/complaints/notifications received by the County during this reporting period and the previous years of permit term is provided below.


Summary of Water Pollution Complaints/Incidents Reported


Source of Report	Number of Complaints/Incidents Reported						
	2013-14	2012-13	2011-12	2010-11	2009-10	2008-09	Totals
County Staff (O&M, Construction Inspectors, etc.)	100	70	78	54	48	92	442
Other Cities/Agencies	37	56	62	50	34	53	292
Water Pollution Hotline & Website	106	86	84	82	107	108	573
Direct Public Contact (calls, e-mails)	22	18	11	7	15	12	85
Businesses	3	1	2	1	3	1	11
Other	13	0	0	1	12	7	33
Total Number of Reports	281	231	237	195	219	273	1436

A review of the data over the last six reporting periods did not reveal significant changes in data for evaluation or comparison (Level 1, 2 and 3 Outcomes).

C-10.2.5 Response Procedures

The County's Authorized Inspectors follow procedures outlined in the Investigative Guidance Manual (developed for use during the 2004-05 reporting period) and Enforcement Consistency Guide (**Exhibit 4.I of the 2003 DAMP**) when responding to and investigating water pollution complaints. In 2010, the Investigative Guidance Manual was updated to the Model Source Identification and Investigative Guidance Manual to address Fourth Term Permit requirements and also to provide Authorized Inspectors with methodology to follow-up source investigations.

These Guidance Manuals and Enforcement Consistency Guide establish response procedures which include record keeping, notifications and response requests, response activities, investigations, clean-up activities, reporting, and education/enforcement. In addition, to ensure that the ID/ICs Program is efficient and effective, the County instituted documentation procedures for its water pollution complaint and spill response activities by developing and implementing a series of forms and guidance materials which are included in **Exhibits A-10.I and A-10.II of Section A-10** of the LIP. There were no modifications to these forms during the reporting period.



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C-10.2.6 Water Pollution Incident Summary

As a part of the ID/ICs Program, the County's Authorized Inspectors receive a variety of water pollution reports and complaints. While every water pollution complaint/report the County receives is treated as a top priority, not all of them require follow-up response or investigation by the County. In order to determine the appropriate action, an incident is categorized by the information received according to the incident categories defined below:

- Notification – An incident reported to the County that does not require any follow up such as an investigation or enforcement. This would include any incidents where the material did not enter the stormdrain system and was in the process of being cleaned up or it may have entered the stormdrain but was determined to have insignificant impact and did not require further action.
- Complaint - A minor incident reported to the County that requires a scheduled investigation. This would include where the discharge is alleged to have already occurred but is not posing an immediate threat to human health or the environment. Examples of this may include: oil that has leaked from a vehicle parked on the street and has soaked into the asphalt or a past discharge from a residence or facility.
- Response Request – An incident reported to the County that requires an immediate investigation/response due to the threatened release/impact to human health or the environment.
- Referral to another agency – The incident is outside of the County's jurisdiction and the complaint is referred to another city or agency for investigation and follow-up.

The following table provides the number of water pollution incidents that were reported to the County according to the established categories. Note that this table includes only water pollution incidents as the previous table included all incidents reported.

Summary of Reports Received

Type of Report	Number of Reports	
	2013-14	2012-13
Notification	75	58
Complaint	88	80
Response request	47	47
Referral to cities or other agency	58	46
Total Number of Incidents	268	231

The following table provides information regarding the water pollution incidents that required response/investigation by County staff and the categories of materials involved.



Jurisdictional Summary of Incidents Requiring County Response



Categories of Materials	Number of Complaints/Incidents	
	2013-14	2012-13
Discharge exceptions*	9	10
Hydrocarbons	32	24
Inorganic compounds	8	4
Irrigation Runoff	2	0
Miscellaneous	17	12
Metals	0	0
Nutrient	0	0
Organic	0	2
Pathogens/Coliform	22	11
Pesticides	0	0
Sediment	9	7
Trash/debris	13	16
Wastewater	16	19
Total Number of Responses	128	105

* Note: irrigation runoff is a discharge exception in the Santa Ana Region

In responding and investigating 128 water pollution incidents during the reporting period, County staff was successful in many instances, in preventing pollutants from impacting the stormdrain system or receiving waters (Level 4, 5 and 6 Outcomes).

C-10.2.7 Regional Board and other Agency Notifications

Water pollution incidents determined to pose an actual or potential significant threat to public health or the environment are reported to the appropriate Regional Board. Depending on the nature of the incident, notification to the California Governor's Office Emergency Services (CalOES) is also made. The following table summarizes the pollution incidents the County responded to during the reporting period which triggered notifications. Some of the incidents described in the table involved multiple agencies and jurisdictions and where indicated, notifications may have been made by other parties.



**Pollution Incidents the County Responded to Requiring
Regional Board/CalOES Notification**



Incident Description	PNIR* Number	Date of Incident	Regional Board Notified	CalOES Notified (Control No.)
Notification of a hydrocarbon sheen observed in flood channel	8999	7/10/2013	Santa Ana	13-4265
County Dry Weather Monitoring Team reported a sheen in flood channel	9053	8/14/2013	Santa Ana	13-5027
60 gallons diesel fuel spilled from vehicle accident into stormdrain on Freeway	9082	9/25/2013		13-6047
Notification of a vehicle fire and fuel spill	9099	9/4/2013		13-5517
Diesel discharge into Dana Point Harbor	9100	10/8/2013		13-6288
California Fish & Wildlife reported petroleum sheen in Huntington Beach Channel	9107	10/27/2013		13-662
Small private property sewer spill	9112	10/15/2013		13-6422
Gasoline spill washed to the street gutter	9123	11/19/2013	Santa Ana	13-7149
White-grayish discharge in Hicks Canyon Channel	9131	12/21/2013		13-7827
Crude oil release from oil pumping facility	9136	1/2/2014	Santa Ana	14-0012
Vehicle fire, fuel and firefighting runoff entering stormdrain	9157	2/15/2014		14-0937



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Incident Description	PNIR* Number	Date of Incident	Regional Board Notified	CalOES Notified (Control No.)
Brownish septic tank discharge	9161	2/19/2014		14-1045
Materials dumping along creek, illicit connection and discharge to Canada Gobernadora channel	9177	3/19/2014	San Diego	
Sewage spill and associated road closure	9192	4/28/2014		14-2432
Accidental release of diesel fuel/water mixture onto the soil on OCFCD property	9193	4/24/2014		14-2368
Vehicle collision into flood channel	9194	4/27/2014	Santa Ana	14-2417
Vehicle collision caused the release of non-pcb mineral oil	9203	5/27/2014		14-3004
Paint accidentally oversprayed directly into Aliso Creek	9205	6/3/2014		14-3149
Single vehicle accident impacted flood channel	9221	6/28/2014		14-3664
Sewage spill impacted Upper Newport Bay	9322	2/5/2014		14-0681
Sewage spill impacting stormdrain/dry creek	9333	4/21/2014	Santa Ana	
Private property sewage spill	9340	2/12/2014		14-0864
Discharge from vehicle fire	9345	9/3/2013		13-5517



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Incident Description	PNIR* Number	Date of Incident	Regional Board Notified	CalOES Notified (Control No.)
Power failure caused sewage pump station to fail, releasing wastewater into the storm drain and flood channel	9351	8/31/2013		13-5451
Surfactants exceedance and detergent suds at Dry Weather Monitoring site	9357	6/17/2014		14-3426
Totals:			San Diego Regional Board Notifications: 1	Cal OES reports: 1
			Santa Ana Regional Board Notifications: 6	Cal OES reports: 19

* PNIR stands for Pollution Notification/Investigation Request (Incident Number used by County for record keeping purposes)

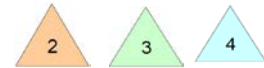
C-10.2.8 Enforcement Summary

The County's Authorized Inspectors undertake enforcement activities according to the County's adopted Water Quality Ordinances and the accompanying Enforcement Consistency Guide (**Exhibit 4.I of the 2003 DAMP**).

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, when selecting enforcement options, the County's Authorized Inspectors ensure that violations of a similar nature receive a consistent enforcement action. More severe enforcement options may be utilized depending on variables such as history of non-compliance or failure to take good faith actions to eliminate continuing violations or to meet a previously imposed compliance schedule. A summary of the enforcement actions taken during the last two reporting periods are provided below.



Summary of Enforcement Actions



Enforcement Type	Total	
	2013-14	2012-13
Educational Letter	1	0
Administrative Enforcement		
Notice of Noncompliance	8	12
Administrative Compliance Order	5	6
Cease and Desist Order	0	0
Criminal Enforcement		
Misdemeanor	3	0
Infraction	0	0
Issuance of Citation	0	0
Criminal prosecution cases	0	4
Totals:	17	22

Enforcement actions continue to play an important role in increasing knowledge and awareness (Level 2 Outcome) and achieving a desired behavior change leads to compliance and reduced loading (Level 3 and 4 Outcomes).

C-10.2.9 Enforcement Case Summary



During the 2013-14 reporting period, no pollution incident cases were submitted to the Orange County District Attorney's Office, however, the County provided analytical support for the Orange County Sheriff's Harbor Patrol in three water pollution related cases; 2 in Newport Harbor and 1 in Dana Point Harbor. Results of the sample analyses supported the Orange County District Attorney's Office/Environmental Protection Unit in the prosecution of these cases.

These enforcement cases contributed to behavior change of boat owners causing the discharges (Level 3 Outcome).

C-10.2.10 Countywide Area Spill Control (CASC) Program



The CASC Program was activated on a sewage release during the reporting period. Below is a summary of the CASC incident:

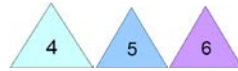


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- Power failure caused sewage pump station to fail releasing wastewater into the Upper Newport Bay, August 31, 2013 (PNIR 9351)
 - Volume released: ~77,000 gallons
 - Cause: Power failure
 - Impact: Upper Newport Bay
 - Accomplishments:
 - pumped ~45,000 gallons wastewater impacted bay water
 - reduced impact to Bay

The response to this incident was successful in removing wastes from the receiving water and reducing downstream impacts (Level 6 Outcome).

C-10.3 Illicit Connections (LIP Section A-10.5)



The County developed a drainage facility inspection and documentation program to identify and eliminate illicit connections to the stormdrain system. Illicit connections to the stormdrain system are prohibited under County ordinance. During the reporting period, no illicit connections were detected.

C-10.4 Source Investigations (LIP Section A-10.4.1)



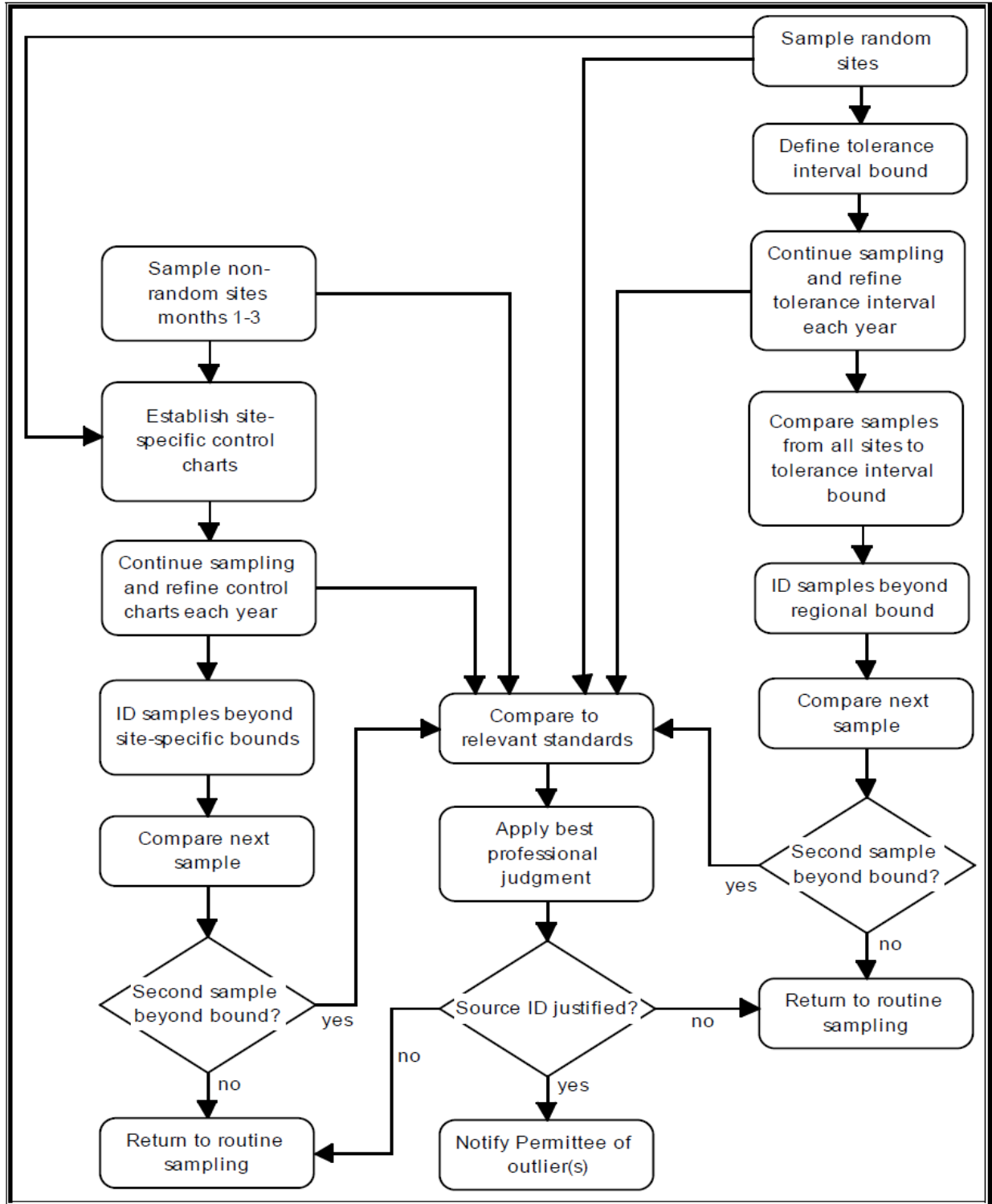
Source investigations are conducted when an illegal discharge or illicit connection is detected or suspected, and the source is not readily identifiable. The purpose of the investigation is to identify the source so that appropriate action can be taken to protect the stormdrain system and prevent pollutant impacts to receiving waters. Source investigations can be triggered based on factors such as visible or odor problems and water quality data.

The Dry Weather Monitoring Program (**DAMP Exhibit 11.II**) was developed in 2003 and implemented countywide as a means of identifying illegal discharges and illicit connections through a field screening program. Notifications are made to the appropriate jurisdiction for follow-up when problems at a drain are detected in the field. In addition, source investigations may be required when data from the dry weather monitoring indicates that a constituent is higher than normal background levels on consecutive screening events. The background levels are calculated on an ongoing basis and are called “Tolerance Intervals” (the procedure for determining these is described in detail in **Section 3.3** of **DAMP Exhibit 11.II**.)

The following flow-chart (**Figure 3-6** of **DAMP Exhibit 11.II**) illustrates the methodology in determining whether or not a source investigation is needed based on dry weather monitoring data.



Dry Weather Source Investigation Flow-Chart





During the reporting period, the County applied this approach to dry weather monitoring sites within its jurisdiction in the Santa Ana Region. The following table summarizes the results:

Summary of 2013-14 Dry Weather Monitoring Results

Drain Designation	Random or Targeted	Watershed	Location	Tolerance Interval Exceedances during Reporting Period		Source Investigation Conducted During Reporting Period?
				Constituent(s) and Number of Exceedances	Consecutive (If more than one)?	
COC01S01@MT	Targeted	Anaheim Bay/Huntington Harbor	Rossmoor	Total Organic Carbon, 3	Yes	Yes
				Ammonia as N, 2	No	
				Total Coliform, 1	N/A	
				Fecal Coliform, 1	N/A	
				Enterococcus, 1	N/A	
				Total Suspended Solids, 1	N/A	
				MBAS (Surfactants), 1	N/A	
				Lead, 1	N/A	
				Copper, 1	N/A	
COF07S01	Targeted	Newport Bay	Tustin (Unincorp.)	Oil & Grease, 1	N/A	Yes
				Copper, 1	N/A	

Santa Ana Region Dry Weather Monitoring Source Investigations

- *COC01S01@MT (Kempton Storm Channel @ Montecito Rd.):*

On July 17, 2013, tolerance interval exceedances for surfactants and ammonia were measured at this outfall. A source investigation was conducted of the tributary drainage area by County staff. No definitive source of the exceedance was identified. Some residential irrigation overspray was observed.

During this investigative reconnaissance a resident in the area complained of a recent foul, chemical odor in a nearby stormdrain. A closer inspection of the stormdrain and nearby catchbasins (located on the east and west side of Montecito between St. Albans and Oak Knoll) was conducted. An excessive amount of trash and organic debris was found inside the debris screens within each of the catchbasins (mainly leaves and grass clippings). The decaying material had a foul odor and possibly may have harbored pollutants from car washing or other non-stormwater discharges. A work order was submitted to remove the organic debris from the catchbasin.



Subsequent analytical laboratory reports of samples collected during site visits indicated elevated concentrations of total organic carbon (TOC), total coliform, fecal coliform, Enterococcus, copper, and pesticides (dimethoate). The decaying organic material in the stormdrain and catchbasin likely contributed to the elevated TOC and bacteria levels and the foul odor.

On August 8, 2013, a subsequent expanded investigative reconnaissance of the area identified improper landscaping maintenance practices at Rossmoor Elementary School on Montecito. A significant amount of grass clippings had been discarded into the curb gutter after a recent herbicide application on the surrounding ball fields. The responsible party (Los Alamitos Unified School District) was issued an Administrative Compliance Order (ACO).

On August 12, 2013 the identified catch basins were cleaned by County staff using a vacuor truck. As a result, a subsequent dry weather monitoring site visit on August 21, 2013 did not measure exceedances for any constituents.

- *COF07S01 (La Colina-Redhill Storm Drain near Redhill Ave.):*

On August 14, 2013, County staff observed an unidentified oily sheen/film on the surface of the water at the pipe (F07S01) outlet. An oil and grease sample was collected as part of the site inspection. A County Authorized Inspector coordinated efforts to locate the source and initiated efforts to contain and cleanup the discharge of oily sheen. This included performing a reconnaissance of the drainage area and installing absorbent booms, pads and filter fabric booms at various points downstream of the outlet (from the Barbara Bensen Elementary School to Bullard Lane in Unincorporated North Tustin). A Hazardous Materials Spill Report was filled to the California Office of Emergency Services (Cal OES Control # 13-5027) to notify and inform them of the observation and cleanup action.

On August 15, 2013 more intensive source investigations were conducted with the rainbow discoloration still present on the water's surface. A water pollution sample for total petroleum hydrocarbon (TPH) Diesel and Waste Oil was collected to better characterize potential sources of the discharge and get a better understanding of the material. A faint petroleum smell was detected but was dissimilar to gasoline, diesel, machine oil or other petroleum products. County staff continued to cleanup the sheen using absorbent booms in the channel through August 18, 2013.

Subsequently, on August 19, 2013, with the oil sheen and odor dissipated, an underground inspection was performed on a portion of the upstream drainage system including F07P06 (a 72" pipe along Hewes Ave.) by an OC Public Works confined space team. No source of the prohibited discharge was observed. However, ponding of water was observed in low portions of the stormdrain system which could delay dispersion of prohibited discharges downstream and result in the slow release of a contaminant long after the original discharge occurred.



Analytical laboratory results of the samples collected on August 15, 2013 confirmed the presence of Oil and Grease (20 mg/l) and TPH/Diesel Range Organics (4.9 mg/l). No Oil range Organics were detected.

On October 3, 2013 a follow up source investigation was conducted of the upstream drainage area during the early morning hours. No oily sheen was observed at the outlet or during this investigative reconnaissance of the upstream drainage area. The reconnaissance did reveal several discharges of irrigation overspray from lawns onto sidewalks, driveways, and streets and into curb gutters and catchbasins in unincorporated north Tustin. These included Hewes Avenue, Saigon Lane, Ervin Lane, and Winthrop Street as well as others. To inform residents of the need to control runoff to the stormdrain while saving water, a total of sixteen public educational pamphlets were handed to residents or left as door hangers in the study area where irrigation overspray was observed. Several residents were given pamphlets and informed directly onsite.

San Diego Region Non-Stormwater Action Level Source Investigation Discussion

Dry weather monitoring in the San Diego Region of Orange County ceased following the conclusion of the 2010 dry season (September, 2010). The San Diego Region Fourth Term MS4 Permit required transition to a year-round Non-stormwater Action Level (NAL) monitoring program. Implementation of this NAL program has begun, and the associated report documentation is included as **Attachment C-10.1** of the PEA. In addition, monitoring data associated with the NAL program is included in **Section C-11** of the PEA and **Section 11** of the Unified Annual Report.

C-10.5 Training and Outreach (LIP Section A-10.7)

The education and training of the County's Authorized Inspectors is key to successful implementation of the program especially since they are in the public eye when conducting investigation efforts and proceeding with enforcement actions.

C-10.5.1 Training

One of the primary methods that the County's Authorized Inspectors and other key staff are trained is by having them attend the NPDES Inspection Sub-committee meetings. During the reporting period the County's Authorized Inspectors coordinated, conducted and attended these committee meetings. The following is summary of the training topics.



2013-14 Summary of NPDES Inspection Sub-committee Training

Training	Dates	Presenter
Commercial Industrial Inspections Program & EPA Audit - Industrial Inspection & ID/IC Programs	September 19th , 2013	Thomas Lo, City of Santa Ana
Commercial Industrial Inspections Program - Consultant's Perspective		Cameron McCullough, John L. Hunter & Assoc.
EPA Audit - New Development & ID/IC Program		Gene Estrada, City of Orange
Water Pollution Incident Response Training - Industrial Facility Chemical Fire	December 5th, 2013	Duc Nguyen, OC Public Works
CASC/WDR Update		
Water Pollution Incident Response & Enforcement Training (ID/IC & Construction)	February 6th, 2014	Duc Nguyen, OC Public Works
Various Program Updates		
SWRCB Industrial General Permit	May 8th, 2014	CASQA Webcast

The County trained its own Authorized Inspectors and other staff by having them attend Permittee sponsored training as well as other regional training and workshop opportunities. Other training events include:

- Orange County District Attorney Strike Force Meetings
- CalEPA Basic Inspector Academy
- Federal Law Enforcement Training Centers
- CASQA Annual Conference
- StormCon
- California Hazardous Materials Investigators Association
- Orange County Waste Discharge Requirement Meetings

In addition to Permittee sponsored training conducted during this reporting period, ID/ICs training modules are available in **Section B-10** of **Appendix B** of the DAMP. These ID/ICs training modules have continued to evolve as necessitated by permit requirements. The



primary shift has been towards a “hands-on” training approach. For a current list of the ID/ICs training modules (see **Section A-10.7.1** of the County’s LIP).

C-10.5.2 Outreach

As a part of response activities, Authorized Inspectors provide outreach materials to businesses and residents who may have been identified as a responsible party for an illegal discharge or illicit connection. These materials can range from BMP fact sheets, manuals, posters, and brochures, to door hangers that can be left at properties where a complaint was reported.

C-10.6 ID/ICs Program Modifications

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 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.

ID/ICs Program recommendations included in the Santa Ana Region ROWD include:

1. **Continue current Model ID/ICs Program.**

ID/ICs Program recommendations included in the San Diego Region ROWD include:

1. **Reinstate an approach, such as the Dry Weather Reconnaissance Program, that allows investigative resources to be directed toward abating priority aberrant discharges.**
2. **Continue implementation of CASC.**
3. **Consider development of a standardized reporting database potentially accessible by all Permittees.**