

SECTION C-9

EXISTING DEVELOPMENT

**PROGRAM EFFECTIVENESS ASSESSMENT
2011-12**



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

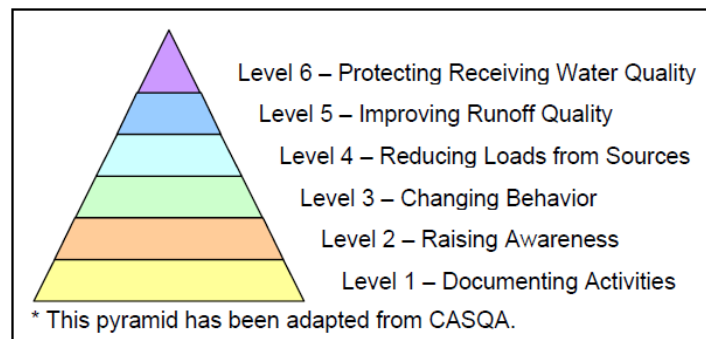
Section C-9.5, Common Interest Area/Homeowner Association (CIA/HOA) Program

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.

**2011-12 Summary of Industrial Facilities by Watershed
San Diego Region**

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams	Totals
Industrial Facilities With General Industrial Permits	7	1	2	10
Industrial Facilities Without General Industrial Permits	3	0	0	3
Totals	10	1	2	13

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	2	1	0	5
Totals	3	2	3	2	10

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 Geographical Information System (GIS) capabilities called MS4Web. The database includes pertinent information about each facility to meet Fourth Term Permit



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requirements. In lieu of submitting 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!

For the 2011-12, please note two changes to the San Diego Region industrial inventory from the previous reporting year. The Greenstone Materials industrial site has been added to the San Diego Region inventory in the San Juan Creek watershed as a new facility (notification provided to the Regional Board during the 2011-12 reporting year), and the former Northrop Grumman Capistrano Test Site in the San Mateo Watershed has been removed due to the cessation of industrial site operations. A final NPDES inspection of the Northrop Grumman Test Site was conducted during the 2010-11 PEA reporting year.

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.

2011-12 Summary of Industrial Facility Prioritization

Industrial Facility Prioritizations	San Diego Region	Santa Ana Region	Total Number of Facilities
Facilities subject to the Industrial General Permit or equivalent permit (high priority)	10	5	15
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



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Industrial Facility Prioritizations	San Diego Region	Santa Ana Region	Total Number of Facilities
Subtotal: number of high priority facilities listed above	10	5	15
Number of medium priority facilities	0	0	0
Number of low priority facilities	3	5	8
Total Number of Facilities	13	10	23

The following tables show how the facilities listed above are segregated by watershed in each Regional Board jurisdiction. For the Santa Ana Region, the County has a total of 10 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 50% of its inventory as high priority.

**2011-12 Summary of Industrial Facility Prioritization by Watershed
San Diego Region**

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams	Totals
Number of high priority facilities	7	1	2	10
Number of low priority facilities	3	0	0	3
Totals	10	1	2	13

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	2	1	0	5
Totals	3	2	3	2	10



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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.

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 2011-12 reporting year. The Fourth Term Permit 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 during the 2011-12 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
13 (San Diego Region)	10	None in inventory	3	13
10 (Santa Ana Region)*	4		2	6
Totals	14	0	5	19

*One industrial site, Merlex Stucco, was inspected by the Regional Board through the Industrial General Permit in the Santa Ana Region. In cases where a State inspection has been completed for an industrial facility during the annual reporting year, the County may not conduct an inspection.

For the Santa Ana Region, the County completed industrial NPDES inspections at four of its five high priority facilities and two of its five low priority facilities. The high priority sites include one private company, R.J. Noble, 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. The County also inspected two of its five inventoried low priority sites, Nieto & Sons Trucking and West Newport Oil Company, during the 2011-12 reporting period. None of the six County-lead inspections in the Santa Ana Region warranted an enforcement action under the County and/or OCFCD Water Quality Ordinances. Additional information on BMP implementation issues for the Santa Ana Region is provided in Section C-9.2.7 below. The West Newport Oil Company facility, which is located along the Santa Ana River and Newport Bay watershed boundaries, was determined to be in the Santa Ana River watershed and re-inventoried accordingly.

The other private company site, Merlex Stucco, was inspected by the Santa Ana Regional Board on December 12, 2011 with "No Further Action" indicated in SMARTS. For this site, Fourth Term Permit Section IX, Item 10 of R8-2009-0030 dictates that the County does not need to inspect a facility already inspected by the Regional Board within the specified time period (2011-12 reporting period).

In the San Diego Region, the County conducted industrial inspections for all thirteen facilities in its inventory (including the new Greenstone Materials facility discussed in Section C-9.2.2). None of the thirteen County-lead inspections in the San Diego Region resulted in an enforcement action under the County and/or OCFCD Water Quality Ordinance. 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.



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The County did report one issue noted during the facility inspection to the Regional Board for follow up related to CR&R. While the County did not have formal corrective actions for CR&R as part of its industrial inspection, the County did notify the San Diego Regional Board that the facility had expanded its operation to include a composting facility to the northeast of their 2006 Expansion Area/Recycling Facility. Based on the County's inspection, it was unclear if the SWPPP for the CR&R facility had addressed this expansion for composting, and the San Diego Regional Board was notified to follow up on this issue as warranted.

The County continues to see a high level of cooperation 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 and is provided to the Regional Boards as part of the PEA. 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. Inspection information tracked in the database includes, at a minimum, inspection dates, inspectors present and the results of the inspection. The updated inspection database is stored in MS4Web through the website links provided in **Section C-9.2.2** above.

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 are trained to 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 additional routine/follow-up inspections. Certain industrial sites are routinely inspected on an annual basis to ensure proper BMP implementation.

A summary of BMP implementation based on County inspections conducted during the current reporting period is provided below (Santa Ana Regional Board's inspection of the Merlex Stucco site is also included):



2011-12 Watershed Summary of BMP Implementation at Industrial Sites

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San Diego Region

Watershed	San Juan Creek	Dana Point Coastal Streams	San Clemente Coastal Streams
Number of industrial facilities with BMPs fully implemented	9	1	2
Number of industrial facilities with BMPs partially implemented	1	0	0
Number of industrial facilities with no BMPs	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	2	0	3	2
Number of industrial facilities with BMPs partially implemented	0	0	0	0
Number of industrial facilities with no BMPs	0	0	0	0

The County identified additional improvements needed for existing BMPs at a number of industrial sites in the San Diego Region. These issues were primarily addressed through the annual on-site inspection and directions in the inspection report to ensure full BMP implementation at these facilities. The County has noted the Ewles Materials site as having partial BMP implementation due primarily to housekeeping issues and materials storage practices. The County addressed these issues in its annual inspection for 2011-12, and will continue to incorporate Ewles Materials into its annual inspection program for 2012-13 to ensure proper BMP implementation. Conversely, one example of a success story is the Dana Point Shipyard, which received the California Clean Marina Facility Certification from the American Boat Builders and Repairers Association in 2012. This certification is based on meeting numerous environmental requirements, achieving various compliance standards and BMPs, as well as passing a facility verification inspection by the awarding association.



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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 the County and OCFCD 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.

2011-12 Summary of Enforcement Actions for Industrial Facilities

Watershed	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
N/A	0	0	0	0

The County has not observed violations of its ordinances during the reporting period. The County did refer two issues to the San Diego Regional Board for follow up: 1) ensuring full SWPPP implementation at the CR&R composting facility expansion (see Section C-9.2.6), which is beyond the scope of the County’s ordinance authority; and 2) the potential need for the Greenstone Materials site to file an NOI for the Industrial General Permit (see Section C-9.2.2). With the exception of the issues discussed above, the County has not identified facilities in its jurisdiction that may require coverage under the Industrial General Permit, but have not submitted an NOI.

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 2011-12 reporting period, the County identified no incidents during industrial inspection activities within its inventory that required notification of the Regional Boards due to



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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:

2011-12 Commercial Site/Source Inventory Summary

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 Harbor	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	5	29	2	0	0	0	4	0	40
Airplane repair, maintenance, fueling, or cleaning	0	0	0	0	0	0	0	0	0



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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	1	2	0	0	0	0	0	3
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	9	38	2	0	48	20	129
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	0	3	1	1	2	33	0	40
Cemeteries	0	0	0	0	0	0	0	0	0



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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	3	1	0	0	3	0	10
Mobile pet services	0	0	0	0	0	0	0	0	0
Power washing services	0	0	0	0	0	0	0	0	0
Other commercial sites/sources determined to be significant contributors of pollutants to the MS4, or with a history of unauthorized discharges	0	0	5	0	0	0	0	0	5
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	44***	44
Sites and sources tributary to and within 500 feet of ASBS	0	0	0	0	0	0	0	0	0
Total for all Categories	13	47	28	40	5	2	93	64	292

Notes: * This list is for solely eating and drinking facilities. 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 Orange County Health Care Agency'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 44 listings are in reference to the Dana Point Harbor ESA. Dana Point Harbor commercial facilities have other varying sub-classifications, but these sites have been inventoried as ESA priority within the County's commercial inventory. County staff confirmed the current leaseholds in its jurisdiction as part of its 2011-12 inventorying tasks in the San Diego Region.



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Following adoption of the Fourth Term Permits in both regions, the County's commercial site/source inventory was thoroughly evaluated and re-inventoried to incorporate new commercial categories and address changes in commercial development in the unincorporated areas. In addition, the County coordinated with the cities on inventorying requirements for commercial facilities leased on County owned property located within city boundaries. This project continued in the 2011-12 reporting period, when a full reconnaissance of all commercial and industrial sites was carried out to help confirm their location, active status, commercial classification, and priority (Santa Ana Region). As a result of this detailed review, the commercial inventory totals for the County have been modified further from 315 in 2010-11 to 292 in 2011-12.

As with previous years, the inventory is updated on an ongoing basis within the LIP and provided to the Regional Boards on an annual basis as part of the PEA. The industrial/commercial data set is currently managed through a web-based GIS database called MS4Web, 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. However, additional reduction to the non-food facility commercial inventory occurred in 2011-12 related to the annexation of certain areas from the County to city jurisdictions in the Santa Ana Region, thereby reducing the unincorporated commercial inventory. These annexation areas included the transfer of Sunset Beach from the County to the City of Huntington Beach and the transfer of Kermore Island from the County to the City of Stanton. In addition, the County documented that the City of Fountain Valley incorporated additional business addresses along Harbor Boulevard northwest of the Santa Ana River crossing that were previously considered unincorporated.

C-9.3.3 Prioritization

Within the Santa Ana Region, 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:



2011-12 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 Harbor	Santa Ana River	Newport Bay	
Total High Priority Sites	1	5	3	1	10
Total Medium Priority Sites	2	5	8	0	15
Total Low Priority Sites	4	31	8	1	44
Subtotal of Prioritized Sites	7	41	19	2	69
Number of Eating or Drinking Establishments	6	6	9	38	59
Total Number of Facilities	13	47	28	40	128

Fourth Term Permit requirements in the Santa Ana Region 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 Santa Ana Region table above, the County prioritized 10 out of 69 commercial sites as high (14.5%), 15 out of 69 commercial sites as medium (21.7%), and 44 out of 69 sites as low (63.8%). While the non-food facility inventory decreased in 2011-12, the number of food facilities inventoried has increased in Newport Bay watershed due to the expansion and/or renovation of restaurant facilities at John Wayne Airport. This has resulted in 18 new Newport Bay watershed food facilities that have been incorporated into the HCA inspection program entering 2012-13.

Within the San Diego Region, 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 (13 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:



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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	44	94
Number of Eating or Drinking Establishments	2	0	48	20	70
Total Number of Facilities	5	2	93	64	164

Mobile businesses are addressed through the Countywide Mobile Business Pilot Program. Efforts of the Countywide Mobile Business Pilot Program are summarized in the 2011-12 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:

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 2011-12 reporting period by commercial facility type is presented in the following table:



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**2011-12 Jurisdictional Summary of
Commercial Site/Source Inspections**



Commercial Site/Source Category	Santa Ana Region	San Diego Region
	Number of Sites/Sources Inspected in 2011-12	
Transport, storage or transfer of pre-production plastic pellets	0	0
Automobile mechanical repair, maintenance, fueling, or cleaning	6	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	0	0
Mobile automobile or other vehicle washing	0	0
Automobile (or other vehicle) impound, parking lots, and storage facilities	0	0
Retail or wholesale fueling	0	0
Pest control services and service facilities	0	0
Eating or drinking establishments, including food markets and restaurants* (Food Facilities)	30*	65*
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	0



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Landscaping (and hardscape installations)	1	0
Nurseries and greenhouses	0	0
Golf courses, parks and other recreational areas/facilities	3	8
Cemeteries	0	0
Pool, lake and fountain cleaning	0	0
Marinas	0	0
Portable sanitary service facilities	0	0
Building material retailers and storage	0	0
Animal Facilities (includes animal facilities such as petting zoos and boarding and training facilities)	0	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	2	0
Facilities tributary to 303(d) water body for pollutant generated on site	0	0
Facilities within/directly adjacent or discharging directly to ESA (San Diego Region/Dana Point Harbor Commercial Sites)	0	44
Sites and sources tributary to and within 500 feet of ASBS	0	0
Industrial Facility Inspection Totals (San Diego Region)	N/A	13
Subtotal of Required Inspections Completed (Excluding Eating or Drinking Establishments)	12	66**
Total Inventory (Excluding Eating or Drinking Establishments)	69	107**

*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 exclude restaurants/food facilities from determining the entire total of inspections.

**Combined industrial and commercial inspections per San Diego Region permit requirements.



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The results tabulated above indicate that the County conducted 12 commercial inspections out of a possible 69 facilities in the Santa Ana Region (excluding eating and drinking establishments) during the 2011-12 reporting period. These 12 commercial inspections included all 10 high priority sites and 2 medium priority facilities. This represents full completion of the necessary inspections for year three of the Fourth Term Permit in the Santa Ana Region.

The County conducted 66 commercial site inspections within the 2011-12 reporting period within the San Diego Region. By combining these 53 commercial inspections with the 13 industrial inspections, a total of 66 inspections were conducted out of a combined commercial/industrial inventory of 107 facilities (excluding eating or drinking establishments from this calculation). Based on these totals, a total of 62.6% 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 has begun incorporating annual NPDES commercial inspections as part of the lease agreement inspections for facilities within Dana Point Harbor. As a result, the County conducted 44 annual inspections non-food facility sites within Dana Point Harbor, which increased the overall inspection percentage to 62.6%.

The following table summarizes the percent of required inspections completed by the County for the 2011-12 reporting period:

2011-12 Commercial Inspection Frequency Percent Completed*

Priority	Santa Ana Region	San Diego Region
High	100%**	62.6%***
Medium	13.3%	
Low	0%	

* Excludes eating or drinking establishments

** The Fourth Term Permit's year three requirements are to inspect 100% of high priority commercial facilities within the Santa Ana Region. A portion of medium priority commercial sites were also inspected in the Santa Ana Region that were added in 2010-11 to meet the requirement of inspecting sites within 2 years of addition to the inventory.

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

The County tracks commercial facilities that warranted 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 and drinking establishments in the County's unincorporated jurisdiction. The number of commercial sites/sources that warranted additional investigation in 2011-12, including eating and drinking establishments, is presented below along with data on follow-up actions taken. The total number of commercial program inspections for 2011-12 is 160, which is calculated by adding the total number of eating and drinking establishments inspections from each region (30 and 65,



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respectively) to the subtotal of required commercial inspections completed for non-food facilities (12 and 53, respectively).

2011-12 Summary of Additional Investigations by Watershed



Watershed	Number of Commercial Sites/Sources that Warranted Additional Investigation after Initial Inspection		
	2011-12	2010-11	2009-10
Aliso Creek	0	1	2
Laguna Coast	0	0	0
Dana Point Coastal Streams	8	8	7
San Juan Creek	32	20	16
Anaheim Bay/ Huntington Harbour	5	7	2
Newport Bay	3	3	1
San Gabriel River / Coyote Creek	0	1	1
Santa Ana River	5	6	5
Totals	54	46	34
Percentage of Commercial Sites/Sources that Warranted Additional Investigation after Initial Inspection			
2011-12	2010-11	2009-10	
34% (54 of 160 inspections)	30% (46 of 155 inspections)	30% (34 of 114 inspections)	



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Watershed	Number of Commercial Sites/Sources with Follow-Up Action and/or Re-Inspection		
	2011-12	2010-11**	2009-10**
Aliso Creek	0	0	1
Laguna Coast	0	0	0
Dana Point Coastal Streams	6	0	0
San Juan Creek	28	8	1
Anaheim Bay / Huntington Harbour	5	5	1
Newport Bay	2	0	0
San Gabriel River / Coyote Creek	0	1	0
Santa Ana River	4	1	0
Totals	45*	15	3
Percentage of Commercial Sites/Sources with Follow-Up Action or Re-Inspection Due to Initial Deficiencies			
2011-12	2010-11	2009-10	
28.1%*	10%**	3%**	

*This total reflects that 45 out of 54 observed sites with initial deficiencies on the commercial inspections resulted in further action such as re-inspection. The remaining 9 sites represent duplications from multiple HCA inspections during 2011-12, or sites where a follow-up NPDES inspection by HCA did not identify a deficiency for the facility. The percentage shown indicates 45 out of 163 total inspections (28.1%) resulted in a follow up action and/or re-inspection.

**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 for 2011-12 to reflect all follow-up actions by the County. Additional details on these types of follow-up actions are below.

The percentage of commercial sites warranting additional investigation based on the initial inspection was 34% (54 of 160 inspections) in the 2011-12 reporting period, which is similar to the 30% (46 of 155 inspections) noted for 2010-11 and 30% noted in 2009-10 (34 of 114 inspections). As with previous years, the majority of these issues were observed at eating or drinking establishments in commercial shopping centers. 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 restaurants/food facilities that are receive NPDES deficiencies from HCA for failing to properly manage their trash bins/refuse containers. A



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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. For example, the County is in regular contact with property managers for commercial plazas in Ladera Ranch, and it works directly with these entities to resolve issues as they arise.

- 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 2011-12 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 and drinking establishments) is provided below.



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2011-12 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	1	0	0	0
Laguna Coastal Streams	0	0	0	0
Dana Point Coastal Streams	52	6	0	6*
San Juan Creek	19	28	0	26**
Anaheim Bay/ Huntington Harbour	5	5	0	5
Newport Bay	11	3	0	2**
San Gabriel River/ Coyote Creek	4	0	0	0
Santa Ana River	7	3	0	3
Totals	99	45	0	42
Percentage of Facilities Required to Implement or Upgrade/Modify BMPs				
2011-12	2010-11		2009-10	
26% (42 of 160 inspections)	15% (23 of 155 inspections)		30% (34 of 114 inspections)	

*HCA restaurant/food facility deficiencies 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 work related to commercial sites with partial BMP investigation (primarily HCA restaurant/food facility 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 the County and OCFCD's adopted Water Quality Ordinances and the accompanying Enforcement Consistency Guide. The enforcement mechanisms available are summarized in 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

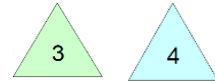


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enforcement remedies. More severe enforcement options may be selected when a violator has a history of deficiencies, has failed to take good faith actions to eliminate continuing violations, and/or has not met a previously imposed schedule for addressing violations.

During the 2011-12 reporting period, the County took the following enforcement actions against commercial sites/sources within its inventory:

2011-12 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	1	0	0
Anaheim Bay/Huntington Harbour	1	0	0	0
Newport Bay	2	0	0	0
San Gabriel River/Coyote Creek	0	0	0	0
Santa Ana River	0	0	0	0
Totals	3	1	0	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 (Level 4 Outcome).

The one Notice of Non-Compliance issued during 2011-12 was related to a restaurant facility’s management practices of their trash bin enclosure in the San Diego Region. The issue was also resolved by re-inspection of the site following the initial HCA inspection report.

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



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hour notification, the County sends a written report within 5 days detailing the nature of the threat and any corrective action taken.

During the 2011-12 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. Reporting of enforcement actions are discussed in **Section C-9.3.7**.

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 the following table, which is based on the quarterly Inspection Sub-committee meetings:



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2011-12 Summary of Existing Development Program Training

Meeting	Training	Training Dates	Agency	Trainer	Number of County Attendees
Countywide NPDES Inspection Sub-committee	Non-stormwater Action Levels and Follow-up Investigations	August 4, 2011	OC Public Works	Richard Boon	8
	SAR MS4 NOV Alerts	August 4, 2011	OC Public Works	Duc Nguyen	8
	Regional Board Staff Strategies for Industrial Facility Inspections	December 8, 2011	Santa Ana Regional Board	Adam Fischer	7
	Roundtable Discussion of Recent Pollution Incidents/Cases	December 8, 2011	OC Public Works	Group Panel (Duc Nguyen overseeing)	7
	2010-11 PEA - Inspection Data Overview	February 2, 2012	OC Public Works	Christy Suppes	5
	L01S02 Pollutant Source Investigation	February 2, 2012	City of Dana Point	Lisa Zawaski	5
	NPDES Permit Notification Requirements	February 2, 2012	OC Public Works	Duc Nguyen	5
	DAMP Update: Sections 9 & 10	June 7, 2012	OC Public Works	Christy Suppes	6
	Inspector Awareness - Hostile Situations	June 7, 2012	OC District Attorney's Office	James McConnell	6
	Industrial Stormwater Management and Compliance at John Wayne Airport	June 7, 2012	John Wayne Airport	Maria Pope	6
OC Public Works O&M Meeting	NPDES Pollution Incident Response Training	December 14, 2011	OC Public Works	Duc Nguyen, James Fortuna	24



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Additional training efforts are included in **Section C-2** of the 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 2011-12 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.
- Additional outreach items are included in **Section C-6.3** of the PEA.

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.

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. 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.

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);



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- 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.

C-9.4.4 Enhanced Implementation

The County evaluated its residential BMPs as part of the LIP update in the 2011-12 reporting year. Based on an assessment of these factors, updates to the minimum designated residential BMPs were not required.

With the onset of Non-Stormwater Action Levels (NALs) monitoring program in the San Diego Region during 2011-12, 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 monitoring program can be found in **Sections C-10** 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.



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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 2011-12 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 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.

In addition, a pilot program has been developed to control pollutant discharges from CIAs and areas managed by HOAs or other management companies. These efforts are discussed in the 2011-12 Santa Ana Region Unified Annual Report.

C-9.5.2 Inventory

The County has developed a watershed-based map of residential and CIA/HOA areas within its jurisdiction in the San Diego Region. 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. The residential map is updated on an ongoing basis within the LIP and using the County's MS4Web online GIS database.

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 facility should implement. The activity based fact sheets that were developed are included in **Exhibit A-9.II** of the County's LIP. There were no modifications to the fact sheets during the reporting period.



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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.

In addition to this outreach, the County interacted with CIA/HOA through other relevant programs. These interactions included direct inspections of CIA/HOA managed facilities such as commercial parks and common areas within CIA/HOA authority as part of the NALs and Existing Development 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:

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

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

Training

Section 6.3.2 documents training efforts that included targeting CIA/HOA areas. As reported in past years, the County also utilizes a CIA/HOA training module in **Exhibit B-9.V** of the DAMP. This training module continues to be available on the County's website.

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. Additional progress for the overall Mobile Business Pilot Program was completed in 2011-12, including conducting a Mobile Automotive Detailing Workshop in



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Fullerton in June 2012. The County will continue to work collaboratively with other cities on implementing this program, and additional details on the overall progress are reported in the 2011-12 Unified PEA.

The County currently inventories 58 mobile businesses based in its home unincorporated jurisdiction and 62 mobile businesses that operate in the unincorporated areas. The County continues to work on maintaining 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. As part of its efforts in 2011-12, the County did identify two issues recorded against mobile businesses operating in unincorporated areas:

- The San Diego Regional Board forwarded a complaint regarding Double A Mobile Detailing possibly discharging wash water to the storm drain in Ladera Ranch in June 2012. Further investigation of the issue did not confirm the discharge; however, the County issued BMP information and the Mobile Automotive Detailing Workshop brochure related to improper mobile detailing practices in June 2012. The business is based out of Anaheim's jurisdiction; however, the activity occurred within unincorporated Ladera Ranch.
- Jimmy's Auto Detailing was issued a Notice of Non-Compliance and BMP information related to improper mobile detailing practices in June 2012. The business is based out of Mission Viejo's jurisdiction; however, the activity occurred within unincorporated Ladera Ranch.

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. The 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. The County's WQMP inventory and post-construction BMP inspection/verification data is available through the following web links:

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

User Name: PEA

Password: ocMS4!

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. For example, WQMP verification inspections of BMPs were conducted in 2012 at the following San Diego Region industrial sites as part of the industrial inspection process: CR&R (2006 Expansion Area),



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Greenstone Materials (new facility), and the Prima Deshecha Landfill - Green Building Site (OC Waste & Recycling municipal facility). Additional information on these inspections is available in MS4Web.

The majority of the County's WQMPs for residential and CIA/HOA areas are associated with Ladera Ranch. As part of its planned efforts for 2012-13, the County will be working with LARMAC to conduct a regional verification strategy of the post-construction BMPs for the entire community.

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 conducted and expanded in 2011-12 to achieve full program implementation. Based on the County's evaluation, the program is achieving desired Outcome Levels.

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. The following observations were noted:

- The economic downturn has caused an increased turnover of commercial sites and food facilities across Orange County. In addition, the County is slowly transferring unincorporated areas (and associated existing development inventory) to city responsibility. During 2011-12, for example, the Sunset Beach unincorporated area became part of the City of Huntington Beach and the Kermore unincorporated area became part of the City of Stanton. Inventorying and prioritization of commercial sites has become a larger administrative burden for the County's program, particularly in the Santa Ana Region. Based on the size and scattered geographic distribution of the County's inventory, the San Diego Region requirement of inspecting 20% of the combined industrial/commercial inventory is a much simpler system for the County to manage than the Santa Ana Region's high/medium/low prioritization inspection requirements.
- Coordination with Regional Board staff on industrial inspections has been effective in avoiding inspection duplications. The County is tracking industrial inspections conducted by the Regional Boards in SMARTS, and appreciates coordinated inspection efforts with Regional Board staff when feasible.
- To improve on the current inventorying of industrial, commercial, residential, and CIA/HOA sites, the County implemented new database/GIS tracking methods using the MS4Web system and ArcGIS during 2011-12. These new GIS systems have helped the County better consolidate and track its inspection programs, and its use will likely expand in the 2012-13 reporting year.



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Based upon the knowledge gained in preparing this PEA, the County will update Section A-9 of the County LIP. Modifications will primarily address the further implementation of the MS4Web database system and updates to the inventories for each region.