

SECTION C-10

ILLEGAL DISCHARGES/ILLICIT CONNECTIONS

**PROGRAM EFFECTIVENESS ASSESSMENT
2011-12**

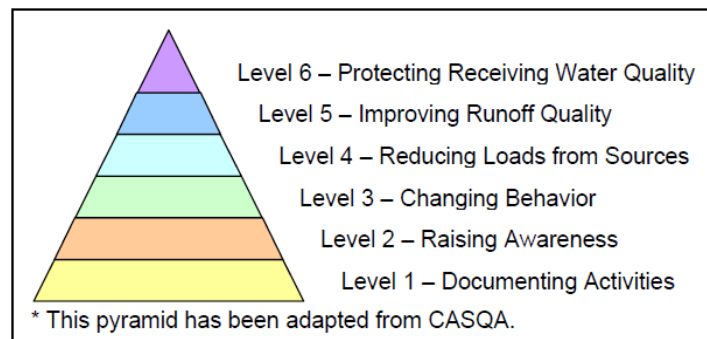


C-10.0 ILLEGAL DISCHARGES/ILLICIT CONNECTIONS (ID/IC)

C-10.1 Introduction (LIP Section A-10.1)

Illegal discharges and illicit connections 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 (LIP Section A-10.2)

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/IC Program .

C-10.2.2 Authorized Inspector Designations

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 OCFCD Water Quality Ordinances.

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



2011-12 List of County Authorized Inspectors

Name	Department	E-mail Address	Phone Number
Duc Nguyen	OC Public Works, OC Watersheds	Duc.Nguyen@ocpw.ocgov.com	(714) 955-0676
James Fortuna		James.Fortuna@ocpw.ocgov.com	(714) 955-0677
Grant Sharp		Grant.Sharp@ocpw.ocgov.com	(714) 955-0674
Richard Boon		Richard.Boon@ocpw.ocgov.com	(714) 955-0670
Jian Peng		Jian.Peng@ocpw.ocgov.com	(714) 955-0651
Kacen Clapper		Kacen.Clapper@ocpw.ocgov.com	(714) 955-0652

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 illegal discharges and illicit connections including the following:

- Municipal Activities (Section A-5 of LIP) – OC Public Works O&M staff are trained to assist in the identification of illegal discharges and illicit connections during their daily activities inspecting/repairing/maintaining public infrastructure throughout the County’s jurisdiction. OC Public Works O&M staff is trained to refer water quality problems to the County’s Authorized Inspectors.
- Public Education (Section A-6 of LIP) –All public education materials distributed include the 24 hr. water pollution problem reporting phone number (1-877-89SPILL) and the website address for online reporting of pollution and drainage problems: <http://www.ocwatersheds.com/WaterPollutionHotline.aspx>
- 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 illegal discharges 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) is extremely valuable in immediately identifying problem areas. As monitoring staff collect samples, any irregular or abnormal conditions detected through field



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observations and/or measurements may be reported for initiation of ID/IC source investigation efforts.

The status of the County's legal authority for addressing ID/IC is discussed in **Section C-4.0**.

C-10.2.4 Water Pollution Reports/Complaints/Notifications

In order to implement a successful ID/IC program, the County provides several means for the public to report information about potential or existing problems so that they can be mitigated 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://www.ocwatersheds.com/WaterPollutionHotline.aspx>. The hotline number and website address are included on all public education material.

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





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With this new APP, 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 residents to confirm the location of repair or service need by GPS which will assist 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										
	2011-12	2010-11	2009-10	2008-09	2007-08	2006-07	2005-06	2004-05	2003-04	2002-03	Totals (since 2002-03)
County Staff (O&M, Construction Inspectors, etc.)	78	54	48	92	85	103	113	273	494	344	1,684
Other Cities/Agencies	62	50	34	53	59	52	37	24	40	31	442
Water Pollution Hotline & Website	84	82	107	108	108	126	107	94	15	15	846
Direct Public Contact (calls, e-mails)	11	7	15	12	19	25	37	8	85	39	258
Businesses	2	1	3	1	2	2	2	0	25	19	57
Other	0	1	12	7	2	3	2	45	19	13	104
Total Number of Reports	237	195	219	273	275	311	298	444	678	461	3,391

Analysis of the data over the last ten reporting periods provides valuable feedback. A shift in the 2005-06 reporting period to a more refined, consistent method of data collection is responsible for the subsequent decrease in the total number of reports. This program modification has resulted in more accurate data collection (Level 1 Outcome).

Since the 2005-06 reporting period, numbers have been steadily decreasing from year to year (Level 3 Outcome). However, this trend changed significantly as the total number of complaints/ incidents reported by County staff and other cities/agencies in 2011-12, was 44% higher than the previous reporting period. Other significant differences were: 1) the data from



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other cities/agencies increased 24% from last year and; 2) the number of water pollution hotline and website reports remained roughly the same.

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. The response procedures generally include record keeping, notifications and response requests, response activities, investigations, clean-up activities, reporting and education/enforcement. In order to ensure that the ID/IC Program is efficient and effective, the County has instituted documentation procedures for its water pollution complaint and spill response activities. To facilitate implementation of these procedures, a series of forms and guidance materials have been developed and 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.

C-10.2.6 Water Pollution Incident Summary

As a part of the ID/IC Program, the County's Authorized Inspectors receive and respond to a variety of water pollution reports and complaints. When incident information is received, it is evaluated to determine the appropriate action. Based on the type of required action, a category is assigned to the incident. Listed below are the descriptions to the response categories:

- 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 storm drain system and was in the process of being cleaned up or it may have entered the storm drain 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 tables provide information regarding the water pollution incidents that were reported and required action by the County in 2011-12.



2011-12 Summary of Reports Received

Type of Report	Number of Reports	
	2011-12	2010-11
Notification	62	30
Complaint	55	68
Response request	60	41
Referral to cities or other agency	60	56
Total Number of Incidents	237	195

Every water pollution complaint/report the County receives is treated as a top priority, however not all of them require follow-up response or investigation by the County. The following table summarizes the number of incidents during the reporting period 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	
	2011-12	2010-11
Discharge exceptions	9	5
Hydrocarbons	27	17
Inorganic compounds	5	2
Miscellaneous	1	11
Metals	25	0
Nutrient	0	0
Organic	0	1
Pathogens/Coliform	18	14
Pesticides	0	1
Sediment	9	13
Trash/debris	7	9
Wastewater	13	18
Total Number of Responses	114	91

In responding and investigating 114 water pollution complaints and reports during the reporting period, County staff was successful in many instances, in preventing pollutants from



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impacting the stormdrain system (Level 4, 5 and 6 Outcome). A map providing the above data in a graphical representation is included in **Attachment 10.1** of this PEA.

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 of the California Emergency Management Agency (CalEMA) may also be required. Previously, notifications to the California Department of Fish & Game (DFG) were also listed, however, since DFG automatically receives CalEMA reports, DFG notifications are no longer reported separately. 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. A number of these incidents resulted in pollutants being prevented from impacting the stormdrain system or receiving waters (Level 4, 5 or 6 Outcome).

Pollution Incidents the County Responded to Requiring Regional Board/CalEMA Notification



Incident Description	PNIR* Number	Date of Incident	Regional Board Notified? (Santa Ana or San Diego)	CalEMA Notified? (Control No.)
Contractor cutting concrete did not contain runoff	8663	4/17/2012	Santa Ana	No
Sanitary sewer overflow impacting Santa Ana River	8657	4/12/2012	Santa Ana	12-2159
Illegal discharge of sewage wastewater into the storm drain system	5012	8/23/2011	Santa Ana	11-4998
Response to red diesel release into Carbon Creek	8379	8/7/2011	Santa Ana	11-4679
Response to traffic collision resulting in the release of mineral oil to La Mirada Channel	8477	8/18/2011	Santa Ana	11-4904
Water containing mineral oil from an underground utility vault discharged to stormdrain	8342	8/31/2011	Santa Ana	Yes, by Reporting Party (RP)



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Incident Description	PNIR* Number	Date of Incident	Regional Board Notified? (Santa Ana or San Diego)	CalEMA Notified? (Control No.)
Response to sanitary sewer overflow Huntington Beach Channel	8671	5/7/2012	Santa Ana	Yes, by RP
Chemical spill impacting the stormdrain	8433	9/19/2011	Santa Ana	11-5575
Illegal discharge of tile cutting residue into Carbon Creek Channel	8510	10/18/2011	Santa Ana	11-6237
Potential fire suppression runoff impact to Lane Channel	8519	7/23/2011	Santa Ana	Yes, by Fire Dept.
Non-compliance conditions observed during follow-up of restaurant inspection	8620	1/19/2012	San Diego	No
Fire suppression system malfunction resulted in the washing of automotive fluids to the stormdrain	7782	7/1/2011	San Diego	No
Response to sanitary sewer overflow	8634	2/19/2012	San Diego	12-0984
Totals:			San Diego Regional Board Notifications: 3	Cal EMA reports: 1
			Santa Ana Regional Board Notifications: 10	Cal EMA reports: 9

* PNIR refers to Pollution Notification/Investigation Request (incident identification number used by County for record keeping purposes)



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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 remedy. 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.

2011-12 Summary of Enforcement Actions



Enforcement Type	Total	
	2011-12	2010-11
Educational Letter	0	2
Administrative Enforcement		
Notice of Noncompliance	6	10
Administrative Compliance Order	4	6
Cease and Desist Order	0	0
Criminal Enforcement		
Misdemeanor	0	0
Infraction	0	0
Issuance of Citation	0	0
Other: (Criminal prosecution cases)	7	3
Totals:	17	28

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

C-10.2.9 Enforcement Case Summary



During the 2011-12 reporting period, settlement was reached on a pollution incident case that was originally submitted to the Orange County District Attorney’s Office but was prosecuted



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by the California Attorney General's Office. The County also provided support for the Orange County Sheriff's Harbor Patrol in seven other water pollution related cases.

The resolved pollution case involved intermittent discharges of industrial wastewater which impacted Fullerton Creek and Craig Lake, within the County's Craig Regional Park in Fullerton for a number of years. In April of 2007, the quality of the creek and lake water in Craig Regional Park was impacted so badly that several hundred fish were killed and Craig Lake had to be closed to the public while a cleanup was undertaken by the County. As a result of this incident, a joint source investigation with the City of Brea, the Santa Ana Regional Water Quality Control Board, and the California Department of Fish & Game was conducted but the source of the discharges could not be identified. The discharges occurred intermittently over the next 18 months and in September of 2008, a probable source was identified in a stormdrain pipe during an underground inspection. After additional evidence was gathered, the source was confirmed to be a manufacturer of high tech rubber parts for the aerospace/defense industry in Brea. The company subsequently identified two cross-connections to the stormdrain system on their facility. A case report was subsequently submitted to the Orange County District Attorney's Office but ultimately handled by the California Attorney General's Office. Civil charges for violations of the California Water Code were filed in Orange County Superior Court in March of 2011.

During the 2011-12 reporting period, a series of settlement negotiations took place. OC Public Works staff worked closely with the State Attorney General's Office and the Santa Ana Regional Water Quality Control Board during these negotiations and a Consent Judgment was ultimately filed by the court on December 16, 2011. Under the Consent Judgment, the company has agreed to pay a civil penalty of \$1,589,000 as well as investigation and litigation costs of \$149,338.31. The company admitted to prohibited discharges for a three month period in 2008 and agreed to an injunction prohibiting future discharges.

The settlement is particularly significant to the community surrounding Craig Regional Park, as half of the civil penalty funds (up to \$794,500) are eligible to be used on a project to improve the environmental condition of Fullerton Creek and Craig Lake.

The County also continued to assist the Orange County Sheriff's Harbor Patrol in the processing of boat pollution cases. During the reporting period, the County handled water pollution samples collected by the Harbor Patrol from 7 separate incidents occurring in Newport Harbor. Results of the sample analyses provide support to the Orange County District Attorney's Office/Environmental Protection Unit which handles the prosecution of these boat discharge cases.



C-10.2.10 Countywide Area Spill Control (CASC) Program



The CASC Program was activated on two sanitary sewer overflow (SSO) incidents during the reporting period. Summaries of these two CASC incidents are as follows:

- Private lateral SSO: April 13, 2012- Santa Ana River, Anaheim (PNIR 8657)
 - Approx. loss of 270 gallons (estimated)
 - Cause: blockage
 - Impact: Santa Ana River
 - Accomplishments:
 - Diversion set up at Santa Ana River
 - Estimated 1,900 gallons of wastewater diverted into OCSD sewer manhole
 - Impact to Santa Ana River was minimized

- Private lateral SSO: April 18, 2012- Santa Ana River, Anaheim (PNIR 8658)
 - Approx. loss of 1,480 gallons (estimated)
 - Cause: blockage
 - Impact: Santa Ana River
 - Accomplishments:
 - Diversion set up at Santa Ana River
 - Estimated 77,500 gallons of wastewater mixed with groundwater diverted into OCSD sewer manhole
 - Impact to Santa Ana River was minimized

The responses to these incidents were successful in removing wastes from the Santa Ana River and reducing downstream impacts.

C-10.3 Illicit Connections (LIP Section A-10.2.6)

The County has 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, illicit connections were discovered and resolved as shown below.

Type of Connection	Resulting Action
Illicit Drain to D03	Capped May12
Illicit Drain to C01S01	Permit initiated on April 3
Illicit Drain to F02	Capped on April 10



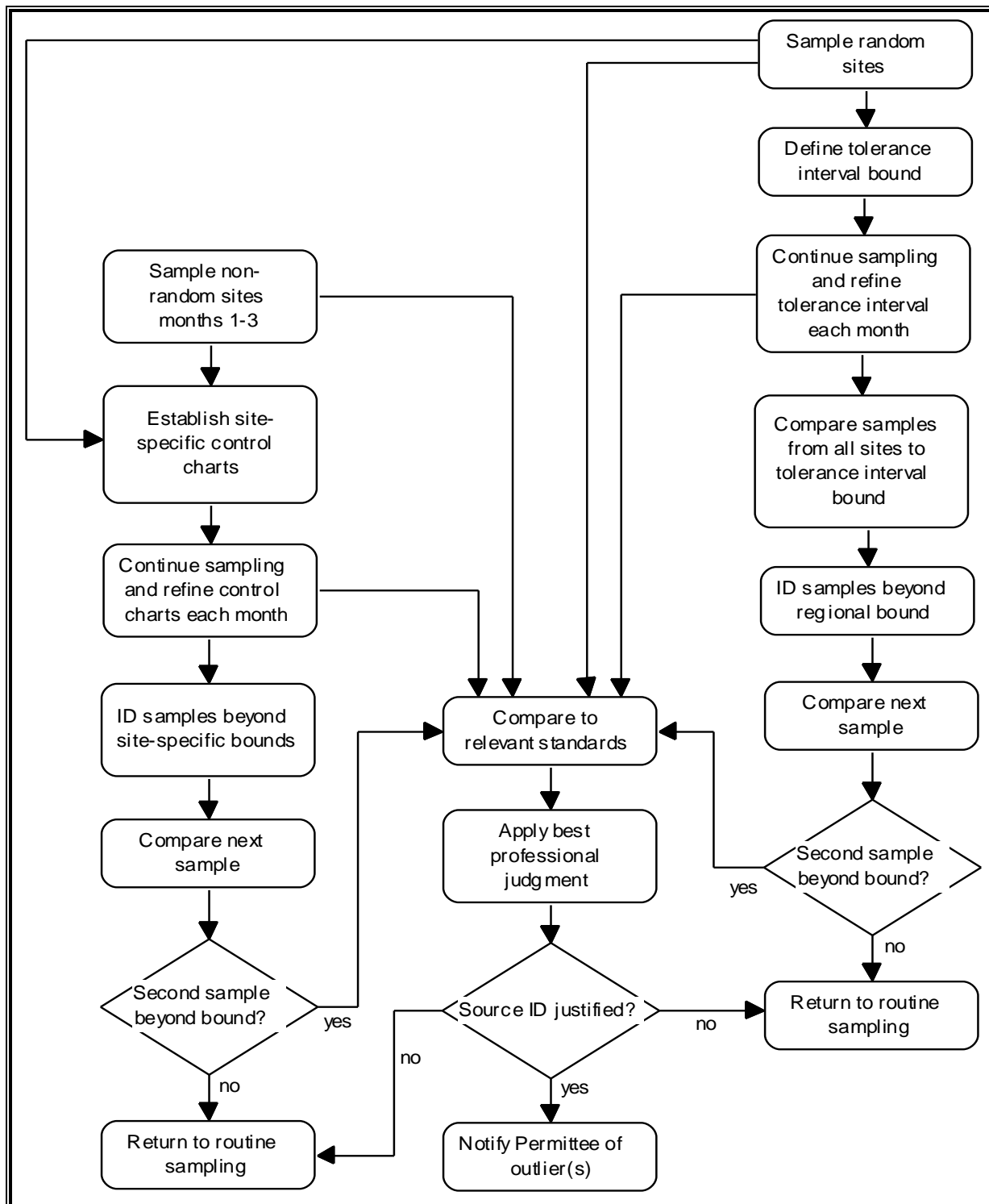
C-10.4 Source Investigations (LIP Section A-10.4.1)

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 the contribution of pollutants to receiving waters. Source investigations can be triggered based on a number of factors such as visible or odor problems and they can also be initiated based on water quality data.

The Dry Weather Monitoring Program (**DAMP Exhibit 11.II**) was developed in 2003 for implementation countywide as a means of identifying illegal discharges and illicit connections through a field screening program. Notifications are made to the appropriate jurisdiction for immediate 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 consistently higher than normal background levels (these background levels are calculated on an ongoing basis and are called Tolerance Intervals). The procedure for determining this is described in great 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 used 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 2011-12 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)?	
COC01S03	Random	Anaheim Bay/ Huntington Harbor	Rossmoor	Electrical Conductivity, 1	N/A	Yes
				Turbidity, 1	N/A	
				Total Organic Carbon, 1	N/A	
				MBAS (surfactants), 2	Yes	
				Total Coliform, 1	N/A	
				Enterococcus, 1	N/A	
				Chlorine, 1	N/A	
				Copper, 1	N/A	
COC01S01@MT	Targeted	Anaheim Bay/ Huntington Harbor	Rossmoor	Ammonia, 1	N/A	Yes
				MBAS (surfactants), 1	N/A	
				Oil & Grease, 1	N/A	
				Total Organic Carbon, 1	N/A	
				Total Coliform, 2	Yes	
				Fecal Coliform, 2	Yes	
				Enterococcus, 2	Yes	
				Copper, 2	Yes	
COF13@FH	Random			None	N/A	No
COF07S01	Targeted	Newport Bay	Tustin (Unincorp.)	Chlorine, 1	N/A	Yes
				Oil & Grease, 1	N/A	
				Total Organic Carbon, 1	N/A	
				Total Coliform, 1	N/A	
				Fecal Coliform, 1	N/A	
				Copper, 2	N/A	
				Pesticides (Malathion), 1	N/A	

*San Diego Region Non-Stormwater Action Level Source Investigation Discussion*

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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-10.2** 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.

Santa Ana Region Dry Weather Monitoring Source Investigation Discussion

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- *COF07S01:*

An exceedance of the tolerance interval for Chlorine was recorded at this outfall on 7/11/2011. A resulting source investigation identified the likely source of the Chlorine to be a discharge of pool water from a residence within the tributary area.

On 9/28/2011, a slight sheen was observed at this outfall, but none of the field measurements were in exceedance of a tolerance interval. A source investigation was immediately conducted to determine the source of the sheen, but no definitive source could be identified.

Follow-up Actions: In the case of the source investigation on 7/11/2011, the resident was provided an educational brochure on proper pool maintenance.

Follow-up Actions: In the case of the source investigation on 9/28/2011, a series of three hydrophobic booms were placed downstream of the sampling site to mitigate the impact to the receiving waters.

- *COC01S01@MT:*

Tolerance interval exceedances for both Ammonia and Surfactants were recorded at the outfall on 7/21/2011. A resulting source investigation of the tributary residential area identified a small amount of irrigation runoff but no prohibited discharges. There were no other exceedances of these constituents recorded at this site during the reporting period, although there were consecutive exceedances for Total, Fecal and Enterococcus Bacteria. However, the dry weather flows were minimal all five subsequent site visits during the reporting period, and in fact, the last two site visits (5/15/12 and 6/18/2012) the site was dry.

Follow-up Actions: Continued education of the residents of this unincorporated area on water conservation and efficient irrigation practices.

- *COC01S03:*

On 8/23/11 this site experienced tolerance interval exceedances for Surfactants, Turbidity, Electrical Conductivity, Total Coliform and Enterococcus Bacteria. A consecutive tolerance interval exceedance for Surfactants was experienced on 9/13/11 along with exceedances for Copper and Lead. Source investigations were immediately



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conducted of the tributary drainage area on both occasions. No definitive source or sources of the Surfactants, Turbidity, Electrical Conductivity or Bacteria was identified.

On 5/22/2012, a tolerance interval exceedance for Chlorine was recorded at this outfall, and another source investigation was immediately conducted. Discharge from a leaking pressure washer at a fast-food restaurant located within the tributary area was identified. Contact was made with maintenance personnel at the restaurant and the discharge ceased. As the restaurant is located within the jurisdiction of the City of Seal Beach, the matter was referred to the City for follow-up action.

Follow-up Actions: In the case of the source investigations on 8/23/2011 and 9/13/11 continued education of the residents of this unincorporated area on water conservation and efficient irrigation practices.

Follow-up Actions: In the case of the source investigation on 5/22/2012, the discharge was immediately ceased and the matter was referred to the City of Seal Beach for follow-up.

- *COF13@FH:*

No source investigations were conducted during the reporting period as no constituents exceeded tolerance intervals and no evidence of a prohibited discharge was observed.

C-10.4.1 Multi-Jurisdictional Source Investigations

L01S02, Dana Point



In addition to the above investigations, the County also assisted the City of Dana Point in an investigation of an illegal discharge/illicit connection case on August 31, 2011. The city requested the County's Authorized Inspectors to assist with a response to contain and cleanup the discharge of petroleum sheen at the outlet to San Juan Creek from the L01S02 storm drain. As cleanup was conducted and the discharge was traced further up the watershed, a joint investigation was conducted by Dana Point and San Juan Capistrano with assistance from the County.

After several days of underground inspection by the County's Confined Space Inspection Team and San Juan Capistrano's video camera inspection, the source of the illegal discharge of petroleum products was identified to be from an illicit connection at an automotive repair shop in Dana Point. Evidence of the discharge was documented with photos and samples.

Several weeks later, after sample analysis confirmed the source of the petroleum discharge, the city issued an administrative citation for the business to immediately cease discharge of pollutants and reimburse all cleanup and investigation costs of \$16,000. The automotive business complied with the terms of the citation and on November 28, 2011, permanently blocked the illicit drain.



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. For a summary of the training topics see **Section C-9.3.9** of this PEA.

The County also 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:

- 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/IC training modules are available in **Section B-10** of **Appendix B** of the DAMP. These ID/IC training modules have continued to evolve and are now some of the most effective trainings available. The primary shift has been towards a "hands-on" training approach. For a current list of the ID/IC 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. Specific information on outreach during the 2011-12 reporting period is included in **Section C-6** of this report.

C-10.6 ID/IC Program Modifications

The County has evaluated the outcomes for this program element to determine if any modifications are necessary. The County feels (and the data supports) that this is an effective program element and no major modifications are planned.