

Illicit Discharge Detection & Elimination

BMP 3.1 Storm Sewer Mapping

Measurable Goal 3.1.1: *Develop map showing the location of all outfalls and the names and locations of all waters of the U.S. that receive discharges from those outfalls.*

Status: The storm drain system facility map database was completed prior to SWMP approval.

Proposed Modifications: None

Planned Year 3 Activities: Add new facilities as completed.

Measurable Goal 3.1.2: *Provide ongoing database maintenance and list all revisions in annual report.*

Status: Only one revision of the storm drain facility map was made this permit year. There is a 60 inch pipe that runs from Summerland under Hwy 101 and then discharges to the beach. Field checking of storm drain drop inlets and storm drains was conducted in several of the NPDES permit areas this data was collected with a GPS and will be entered into the storm drain database this next permit year.

Proposed Modifications: None

Planned Year 3 Activities: Continue to update and maintain storm drain maps as needed.

Measurable Goal 3.1.3: *Make PDF files available by Year 1*

Status: Completed; PDF files of the storm drain system maps are posted on the Project Clean Water website:http://www.sbprojectcleanwater.org/storm_drain_atlas.html

Proposed Modifications: None

Planned Year 3 Activities: The PDF files will be updated whenever there are revisions to the maps.

BMP 3.2 Storm Water Ordinance

Measurable Goal 3.2.1: *Adopt and enforce ordinance by the end of Year 1.*

Status: The Storm Water Ordinance was drafted during Year 1. The item was brought to the Board of Supervisors as an action to set hearings on June 5, 2007. The original date set for the first hearing was July 17, 2007. However the item was rescheduled by staff due to the unforeseen circumstance of the Zaca fire. The Board approved the ordinance on September 25th 2007. Appendix 3A presents the Storm Water Ordinance hearing schedule with details. See board transmittal letter Oct 1, 2007.

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Proposed Modifications: None.

Planned Year 3 Activities: Enforcement of the Storm Water Ordinance (Chapter 29 of the County code) will continue as needed to eliminate non-storm water discharges. Warning Notices, Notices of Violation, Administrative Fines, and Criminal Prosecution will be used as appropriate.

Measurable Goal 3.2.2 : *Evaluate effectiveness of Storm Water Ordinance based on enforcement activities and abatement results. Make recommendations for improvement where inadequacies are identified; provide schedule or timetable to implement improvements Year 2).*

Status: The Storm Water Ordinance provides the County a number of “tools” including giving an inspector the right to enter a facility that shows evidence of a possible illicit discharge to the storm drain system. Since no enforcement beyond a Notices of Violation has been required so far to abate all discharges discovered in the specified amount of time the Ordinance is effective.

Proposed Modifications: None

Planned Year 3 Activities: Continue to evaluate effectiveness of the Storm Water Ordinance based on enforcement activities and abatement results. Make recommendations for improvement where inadequacies are identified.

BMP 3.3 Education & Outreach

Measurable Goal 3.3.1: *Provide Mutt Mitts for proper pet waste disposal and document usage.*

Status: This measurable goal has been implemented in accordance with the Permit Provisions of the SWMP. County staff continues to distribute Mutt Mitts at locations throughout Santa Barbara County. Since Mutt Mitt stations were installed in July 2002, over 130,000 Mutt Mitts have been utilized on the Atascadero bike trail. In addition to Project Clean Water’s efforts County Parks distributes Mutt Mitts to all County parks and many open spaces in county unincorporated areas. The distribution of Mutt Mitts has been documented and accounted for and will continue to be. For this permit year, the County distributed over 339,000 Mutt Mitts.

Proposed Modifications: None

Planned Year 3 Activities: Continue distributing Mutt Mitts.

Measurable Goal 3.3.2: *Continue implementation and provide an annual summary of County Resource Recovery and Waste Management Division’s existing recycling programs and household hazardous waste collection program (years 1-5).*

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Solid Waste Handling and Recycling. The County Resource Recovery and Waste Management Division provides a broad and comprehensive program for the management of solid waste in the unincorporated areas including collection, recycling, and disposal of solid waste, and also the abatement of illegal dumping of waste. For example, one of the most common problems is dumping of household greenwaste, especially for those properties adjacent to creeks.

The Resource Recovery and Waste Management Division of Public Works Department provide outreach and media campaigns to a wide group of targeted communities. See Appendix 3B for examples of these campaigns. The electronic recycling campaign was advertised on two occasions during Year 2, with ads running in the Independent and Goleta Valley Voice.

The following table summarizes amounts of solid and hazardous materials that are removed from the waste stream, which minimizes illegal dumping.

Table 3-1 Amount Waste Collected Recycled

Amount Collected	Waste Stream
16,125 gal.	Used oil collected through County programs (at permanent facilities, including certified collection centers in Goleta, Buellton, and Orcutt, and through curbside collection in the North County)
3,513 lbs.	Used oil filters collected through County programs (2,342 filters)
598,629 lbs.	Total waste collected at the Community Hazardous Waste Center, at UCSB
761,271 pounds	Electronic waste collected at permanent facilities (County transfer stations)
49,728 pounds	E-waste collected at temporary events
60,318 pounds	Household hazardous waste collected at Santa Ynez Valley
5,488 pounds	Household hazardous waste collected at Cuyama Valley
866 gallons (7,361 pounds)	Latex paint collected Santa Ynez Valley ABOP
588 gallons (4,998 pounds)	Used oil collected Santa Ynez Valley ABOP
54 gallons (459 pounds)	Antifreeze collected Santa Ynez Valley ABOP
61 gallons (91.5 pounds)	Number of oil filters collected Santa Ynez Valley ABOP
110 gallons (4,400 pounds)	Number of automotive batteries collected Santa Ynez Valley ABOP
195 gallons (1,657.5 pounds)	Latex paint collected North County Curbside Collection Program
317 gallons (2,694.5 pounds)	Used oil collected North County Curbside Collection Program

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Amount Collected	Waste Stream
102 gallons (153 pounds)	Number of oil filters collected North County Curbside Collection Program
1,604 pounds of trash and 1,017 pounds of recyclables	California Coastal Cleanup Day, September 15, 2007

Details on these and other recycling and reduction programs that help minimize the amount of illegal dumping that ends up in the County's waterways include:

Backyard Composting. County provides information brochure and offers greatly discounted recycling bins for sale once per year at two locations in Santa Barbara and Santa Maria.

Business Recycling Program. Business recycling is mandatory in the unincorporated areas in order to reduce the volume of the landfill waste stream.

California Coastal Cleanup Day. Coastal Cleanup Day takes place throughout the State of California and is conducted in conjunction with International Coastal Cleanup Day. California's Coastal Cleanup Day Program, organized by the California Coastal Commission and other cooperating organizations throughout the state, encourages people to learn about and actively participate in conserving natural resources. The goals of this event are to raise awareness about the issues of ocean and coastal conservation, to pick up litter, to encourage recycling, and to promote community pride. Coastal Cleanup Day allows people to take responsibility for their local waterways and creates an awareness that individual actions do make a difference. The County Public Works Department, Resource Recovery and Waste Management Division, coordinates this event for Santa Barbara County.

Christmas Tree Recycling. Recycling programs for Christmas trees are located throughout the County following the holiday season. The trees are then recovered and ground for mulch. This keeps trees from being illegally dumped into creek channels especially at road crossings where access is easy.

Construction & Demolition Debris Recycling. Construction and demolition materials that are most frequently recovered and recycled in Santa Barbara County are wood, concrete, asphalt, and metal. Gypsum wallboard, carpet, and carpet padding are also being processed and recycled in the area.

Electronics Recycling Program. Every year, hundreds of thousands of electronic items such as computers, computer monitors, televisions, printers, copiers, fax machines, and audio and video equipment become obsolete in California. Over 6,000,000 obsolete computer monitors and televisions are stockpiled in California households, according to a study conducted by the California Integrated Waste Management Board (CIWMB). A study conducted for the National Safety Council projects that more than 10,000 computers and televisions become obsolete in California every day. Further, the study also projects that three fourths of all computers purchased in the United States remain stockpiled in

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storerooms, attics, garages, or basements. Finally, only an estimated 20 percent of obsolete computers and televisions are collected for recycling. Each computer or television contains an average of four to eight pounds of lead. According to the Silicon Valley Toxics Coalition, consumer electronics comprise 40 percent of the lead found in landfills. Other types of electronic items also contain hazardous materials such as cadmium, mercury, hexavalent, chromium, PVC plastic, and brominated flame retardants. About 70 percent of the heavy metals found in landfills emanate from electronic equipment discards. The heavy metals and other toxic materials in electronic equipment can contaminate groundwater and pose other environmental and health risks. The state bans disposal of certain wastes such as batteries, electronic devices, fluorescent lights, equipment containing cathode ray tubes (CRTs) e.g. computer monitors and televisions, and mercury thermostats in the trash. Businesses that generate more than a certain amount are required to use a licensed hazardous waste hauler to manifest and transport their waste. Many household electronics are collected for free at the County's transfer stations. Information for recycling used computers is provided on the County's website:

<http://www.lessismore.org/Programs/electronics.html>

Green Award Program. In Year 2, the County participated in the implementation of a county-wide Green Business Program; <http://www.greenbizsbc.org>. PCW has been a part of the planning in order to ensure that meeting storm water pollution prevention requirements is a criterion for green business certification. This program replaces the Green Awards Program.

Green Waste Recycling. <http://www.countyofsb.org/pwd/rrwmd/CurrentActivities.htm>

The County of Santa Barbara continues to implement an outreach campaign to encourage people to recycle their green waste rather than throw it into their trash containers. The campaign is also designed to educate the public about the types of green waste that can and cannot be placed in green waste recycling containers.

Household Hazardous Waste. Brochures are distributed at all public events and at the County Hazardous Waste Center. Several apartment complexes and property management companies also distribute them to residents. Approximately 2,000 brochures of each type shown in Appendix 3B are distributed each per year. Total amount of waste collected at the Community Hazardous Waste Center during Year 2 was 598,629 pounds.

Mulch Program. Free mulch is available for pickup at both the South Coast Recycling and Transfer Station and the Santa Ynez Valley Recycling and Transfer Station. If a resident wants mulch to be delivered, there is a charge depending on the volume requested. Mulching reduces erosion and improves health of soil.

Sharps Collection Program. Home Generated Sharps (HGS) are needles, syringes with needles, and disposable lancets. HGS are collected for free Santa Barbara County Public Health Department Carpinteria Clinic, the Santa Barbara County Public Health Department Lompoc Clinic, Santa Barbara County Public Health Department Santa Barbara Clinic, Santa Barbara County Public Health Department Franklin Clinic, and the Santa Barbara County Public Health Department Santa Maria Clinic.

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Proposed Modifications: None.

Planned Year 3 Activities: Reporting on ongoing programs and commitments will continue; no additional Year 3 activities are recommended.

BMP 3.4 Spill Complaint and Response

3.4.1 Measurable Goal: *Respond to 100% of complaints of illicit/illegal discharge within 24 business hours of receiving the complaint, referral or notice.*

Status: All complaints, referrals and notices of illicit/illegal discharges are responded to within 24 business hours of receipt. See summary in Appendix 3C. Usually response is immediate since there are Project Clean Water staff available at all times during normal business hours.

Proposed Modifications: None

Planned Year 3 Activities: A 24-hour business-hour response to all complaints will continue in Year 3.

3.4.2 Measurable Goal: *Document response to complaints, notices and referrals received.*

Status: The County responded to 48 complaints and discoveries for this permit year. As shown in Appendix 3C. The data was transferred to Microsoft Access from Microsoft Excel for easier tracking and analyzing of data.

Proposed Modifications: None

Planned Year 3 Activities: Continue with documentation of response efforts by Project Clean Water staff.

3.4.3 Measurable Goal: *Respond to 100% of calls to County Departments within 24 hours. Complaints outside direct County jurisdiction are forwarded to appropriate regulatory agency responsible for elimination of illegal discharges. In such cases, County will verify course of action taken by the appropriate agency within three working days and maintain record of that outcome in the Project Clean Water database. Where the County of Santa Barbara has enforcement authority (i.e., Planning and Development, Solid Waste, Fire Department), County will respond directly and identify and control or eliminate illicit discharges.*

Status: 100% of calls to Project Clean Water have been responded to within 24 hrs as shown in Appendix 3C. Complaints outside direct County authority are forwarded to appropriate regulatory agency within 24 hrs. Where those complaints were forwarded, staff always attempted to confirm receipt of the complaint and course of action by the agency

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within 24 hours. In cases where the agency doesn't reply to such inquiries, it was not always possible to verify the course of action taken within three business days. Nonetheless, the County does and will continue to make follow up requests of other agencies immediately and continue to follow-up as appropriate.

Proposed Modifications: None

Planned Year 3 Activities: Continue response and forward complaints within 24 business hours.

3.4.4 Measurable Goal: *The County will review complaint response protocols on an annual basis, in particular for the response, follow-up, and referral outcomes, to assure that abatement and enforcement measures are being implemented. If shortcomings are identified, recommendations for improved protocols will be made. The goal of successful complaint response is to assure that illicit discharges are cleaned-up in a timely manner and enforcement action taken if appropriate, in order to protect water quality.*

Status: Responses to each complaint are reviewed during weekly PCW staff meetings. Potential improvements to response protocols are discussed in instances where current approaches are not effective. No changes were made this permit year.

Proposed Modifications: None

Planned Year 3 Activities: Continue to evaluate complaint response protocols in staff meetings and revise as appropriate.

BMP 3.5 Commercial/Industrial Facility Inspections

3.5.1 Measurable Goal: *The Fire Department is responsible for inspecting sites and monitoring their compliance with hazardous materials best management storage practices and spill response as authorized under the County's CUPA program. Fire Department shall continue to inspect and monitor all regulated commercial and industrial facilities that use, store, or generate hazardous materials/wastes. Continue reporting, recordkeeping, and spill response as directed under the current regulatory programs.*

Status: The Fire Department's County Hazardous Materials Inspection section has state mandated reporting and recordkeeping standards. Pursuant to mandated timelines, these reports will be available on September 30th and transmitted under separate cover as an addendum to this Annual Report.

Appendix 3D shows the inspection forms used for all County Fire Department inspections of businesses that generate hazardous waste or handle hazardous materials (see "Business Plan / CalARP" and "Hazardous Waste Generator" inspection forms). Based upon these forms, violations that have potential threats to water quality include:

Hazardous Waste Generator Inspection Form:

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HSC 25504(b) "...prevention/mitigation measures to protect people/environment, evacuation/notice procedures"

HSC 25507 "Immediate reporting of a release to 911 and State OEA"

Business Plans / CalARP Form:

CCR 22 66265.31 "Good housekeeping practices in place"

CCR 22 66265.171 "Containers are in good condition / inspected weekly"

CCR 22 66265.173 "Containers are closed except when adding / removing

The Regional Board's comment letter on the Year 1 Annual Report (January 28, 2008) requested information on the Inspection Summary Report for 7/1/06 – 6/30/07 (Year 1). The Inspection Summary Report for 7/1/06 – 6/30/07 was transmitted to the Regional Board on September 28, 2007. A copy of that transmittal is also shown in Appendix 3E.

The Inspection Summary Report shows businesses cited with violations that did not comply within the due date established. Because of the nature of some violations cited on the form (e.g. "housekeeping practices in place", "containers closed", "containers properly labeled") it is possible, though unlikely, that there were potential threats to water quality. Fire Department inspectors make every effort to utilize education and effective enforcement procedures to minimize the potential risk to human health and the environment. Follow-up actions are scheduled if inspectors determine there is a potential safety risk.

AS stated above, the Year 2 report including inspection summaries for 7/1/07 – 6/20/08 will be submitted to the Regional Board by September 30th.

Training was provided to all County Fire Department CUPA inspectors and hazardous materials unit staff and their managers (total: 10) on April 30, 2008, during a staff retreat at Los Alamos County Park. This training focused on awareness of NPDES permit requirements and role of Fire Dept inspectors in implementing MCM 3.0.

Proposed Modifications: None

Planned Year 3 Activities: Continue performance of hazardous materials generators inspections results in the annual report and providing annual staff training for inspectors.

3.5.2 Measurable Goal: *County Environmental Health Department is responsible for inspecting all facilities that sell or give away food. Routine inspections are conducted annually with frequent follow-up and enforcement, based upon complaints or violations. Continue ongoing reporting, record-keeping, and complaint response as directed under the current regulatory programs.*

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Status: The County Public Health Department's Environmental Health Service specialists perform routine annual inspections and complaint investigations at all retail food facilities, as authorized by Health & Safety Code Section 113725 and County Health & Sanitation Code Chapter 18. This inspection program follows state-mandated reporting and recordkeeping standards for food service facilities. The septic system inspection program is an effective program where private pumpers are required to submit reports to EHS whenever they make a septic system inspection. Thus, qualified inspectors submit regular reports that address system deficiencies including surfacing liquid waste. Results of these inspection programs for both Year 1 and Year 2 are shown in Appendix 3F.

Training was provided to all Environmental Health staff, including food service inspectors and management (total in attendance: 23) on May 16, 2008. The subject for that training was the requirements of General Permit and the ongoing role that Environmental Health inspectors provide enforcement through restaurant inspections. Three primary issues are: cleaning mats outside, dumping wash water outside, and material storage and maintenance outside. The clean water presentation was incorporated into a Division-wide staff retreat held at Lake Cachuma. This training was provided to help inspectors learn what to look for to identify possible or potential for storm water pollution during food facility inspections.

Proposed Modifications: None

Planned Year 3 Activities: Continue of food facility routine inspections and periodic training of inspectors.

3.5.3 Measurable Goal: *Perform business inspections at potentially polluting businesses and operations that are not regulated or not otherwise inspected on a routine basis by Public Health Department (Community Health Program, Liquid Waste Program) or Fire Department (CUPA Program). Measurable goals will include annual routine inspection of 50% of the prioritized businesses and operations that may be sources of illicit discharges.*

Status: This program was designed to identify and eliminate possible storm water pollution coming from those businesses with a business location within the County's SWMP permit area, and that are not otherwise inspected by Environmental Health (food service) or County Fire (hazardous waste generators). Based on recommendations from the RWQCB, revisions were made to the original Project Clean Water Business Inspection Program that was submitted in the Year 1 Annual Report. See Appendix 3G for the current revised Project Clean Water Business Inspection Program (resubmitted to RWQCB in March 2008).

During Year 1, a list of state-issued business licenses within the County's SWMP permit area was created (note: there is no County-issued business license). The list was compared to those businesses already inspected by Environmental Health (food service) and County Fire (hazardous waste generator permits); those businesses were eliminated from the Clean Water list¹. The remaining businesses were sorted by business category and those

¹ There are three NPDES industrial permitted facilities in the County's SWMP permit area: South County Transfer Station, the Orcutt Union School District, and the Southern Calif Gas Company. The Transfer

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categories with an unlikely potential to pollute were also removed from the Clean Water list (see all business classes and those targeted for Clean Water in Appendix 3G). There were 88 total businesses remaining to inspect starting in Year 2 as shown in Appendix 3G.

Out of the 88 businesses, 29 were subsequently removed because they were outside the SWMP permit area (the original sort was based upon zip code, so these businesses were within a zip code that included partial permit area coverage). Of the 59 remaining, 26 routine inspections were conducted. This represents 44% which is below the goal of 50% of the list. Of the 26 routine inspections, it was determined that some businesses were inspected by Fire Department (18), some had gone out of business (5) or home addresses representing mobile business (3). One was a service station with food facility, inspected by EHS. Therefore, out of the 26 routine inspections, only nine remain in the Clean Water list for reinspection. See discussion below regarding outcome of the inspections. The list of remaining Clean Water businesses is shown in Appendix 3H.

During Year 2, the original inspection check sheet was found to be cumbersome and overly detailed and time-consuming in the field. The revised inspection check list is shown in Appendix 3I. However, the original will be retained as a training aid for new inspectors.

Proposed Modifications: None

Planned Year 3 Activities: Continue to inspect priority businesses on a more frequent basis to achieve 50% or greater; continually update list of priority businesses through all available resources (i.e. Fire Dept, EHS, phone book, state-issued licenses, etc.). It is critical to reevaluate the list on yearly basis to track new businesses, changing addresses or names.

3.5.4 Measurable Goal: *Evaluate effectiveness of business inspections based on enforcement activities and abatement results. Make recommendations for improvement where inadequacies are identified; provide schedule or timetable to implement improvements (year 2-5).*

Status: During Year 2, there were no enforcement activities required as a result of the Project Clean Water business inspections. Although no discharges were identified, two businesses required minor corrections to improve site practices or to verify an operational practice. No written notice regarding these corrections was necessary because no discharges had occurred. Instead, information on recommended improvements / correction was provided immediately to the business manager at the time of the inspection. Follow-up visits by the inspector resulted in corrections completed within one week.

Proposed Modifications: None

Station is a County facility inspected by Resource Recovery staff and is a facility outside the scope of the Project Clean Water business inspection program. The Orcutt Union School District and Southern Calif Gas Company are each inspected by Fire Dept. under the CUPA inspection programs.

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Planned Year 3 Activities: Continue to evaluate the effectiveness of the program throughout the year and make changes as needed. It is recognized that mobile cleaners are a difficult business category to inspect and regulate. During Year 3, the County will implement an outreach program targeting mobile businesses, including but not limited to auto detailers, carpet cleaners, surface pavement cleaners, and tile/sawcutting practices.

BMP 3.6 Field Investigations and Abatement

3.6.1 Measurable Goal: *Inspect targeted urbanized creeks within the County permit area twice annually with follow-up inspections as appropriate to ensure abatement of violations.*

Status: Creeks within the permit area are walked within the permit-area boundaries by both Project Clean Water staff and Flood Control staff during the year. The following table documents the dates and discoveries, if found, during creek walks in Year 2.

Table 3-2 Creeks Walked Year 2

Stream	*Date Walked	Discoveries	Comments
Alamo Pintado	4/7/08fc, 3/15/07pcw	None	
Arroyo Paredon	3/17/08fc, 2/21/08pcw	Poor agricultural practices, Trash	Forwarded to CRCD
Atascadero	4/8/08fc, 2/28/08pcw	None	
Buena Vista	4/2/08fc, 10/11/07pcw	None	
Carpinteria	3/17/08fc, 4/5/07pcw	None	
Cieneguitas	3/18/08fc, 11/30/06pcw	None	
Devereux	3/17/08fc, 8/31/08pcw,	Trash	Creek Clean Up 4/20/08
Garrapata	3/17/08fc, 9/27/07pcw	None	
Hot Springs	4/2/08fc, 8/24/06pcw	None	
Hospital	3/18/08fc, 3/21/08pcw	Trash, Dog Waste	Creek Clean Up 4/20/08, Service Master Cleaned
Las Palmas	11/21/07pcw, 4/12/07pcw	None	
Las Vegas	3/19/08fc, 3/7/08pcw	None	
Maria Ygnacio	4/9/08fc, 3/6/08pcw	None	
Montecito	3/31/08fc, 7/27/07pcw	None	
Oak	4/2/08fc, 3/12/08pcw	None	
Orcutt /Orcutt	3/20/08fc, 3/15/07pcw	None	
Solmon			
Picay	3/17/08fc, 11/2/07pcw	None	
Romero	4/1/08fc, 11/2/07pcw	None	
San Antonio	4/3/08fc, 12/7/06pcw	None	
South Coast			
San Antonio	3/24/08fc, 6/19/08pcw	None	
Los Alamos			
San Jose	3/26/08fc, 11/1/06pcw,	None	
San Pedro	3/26/08fc, 3/7/08pcw	None	
San Ysidro	4/8/08fc, 3/20/08pcw	None	
Santa Monica	7/8/07pcw, 4/5/07pcw	None	
Tecolote	4/8/08fc, 1/18/08pcw	None	
Toro Canyon	4/2/08fc, 9/20/08pcw	None	

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Stream	*Date Walked	Discoveries	Comments
Zanja De Cote	3/26/08pcw, 6/19/08pcw	None	

*(fc = Flood Control, pcw = Project Clean Water)

Proposed Modifications: None

Planned Year 3 Activities: In addition to ongoing creek walks as described above, the complete list of waterbodies within the permit area from Table 1 of the Storm Water Management Program will be compared to the list of waterbodies walked by Project Clean Water staff historically, and additional waterbodies will be investigated for inclusion into the current creek walk program.

3.6.2 Measurable Goal: *Ensure conversion of failing septic systems to sewer when the system is within 200 feet of an approved sewer system, as determined by EHS.*

Status: This measurable goal tracks an ongoing program implemented by the County Environmental Health Services to inspect and require conversion of failing septic where a sanitary trunk line is within 200 feet, following Chapter 7 of the California Plumbing Code requirements.

In Year 2, there was one conversion of a failing septic system to sewer, where the failing system was within 200 feet of a sanitary trunk line.

Proposed Modifications: None

Planned Year 3 Activities: Ongoing requirement will continue; any conversions that occur during Year 3 will be reported in the Year 3 Annual Report.

3.6.3 Measurable Goal: *Take action to abate deficiencies that are identified on septic system pumper reports.*

Status: When a septic system is serviced, county code requires that it be inspected and that the inspector file a report documenting the results of the inspection with Environmental Health Services. When an inspection report identifies deficiencies with the system, property owners are sent notices directing them to make necessary corrections within a specified time frame. Follow-up notices are sent if the property owner fails to comply as directed by the initial notice. Escalating enforcement action is implemented against property owners that fail to correct noted deficiencies.

In Year 2, Appendix 3F shows 18 septic systems that were in failure, resulting in surfacing liquid waste. Of these, 13 were abated, and the remaining 5 were ongoing by the end of this reporting year, July 1, 2008.

Proposed Modifications: None

Planned Year 3 Activities: Environmental Health Services will continue to address deficiencies in pumper reports through Year 3 pursuant to this BMP.

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3.6.4 Measurable Goal: *Eliminate 100% of all other illicit discharges reported to or discovered by County staff.*

Status: 100% of all other illicit discharges reported or discovered by Project Clean Water staff were documented as complaints or discoveries and addressed within 24 hrs as shown in Appendix 3C. Follow-up field investigations eliminated all illicit discharges as shown in Appendix 3C.

Illicit discharges reported or discovered by Environmental Health are shown in Appendix 3F under Programs 3825 (ocean water) and 2400 (liquid wastes, such as graywater). As shown in this appendix, there were 122 complaints received in Year 2 and 121 abated, with one case ongoing as of the end of reporting year, July 1, 2008.

Proposed Modifications: None

Planned Year 3 Activities: Ongoing activities to eliminate illicit discharges will continue during Year 3.

3.6.5 Measurable Goal: *Establish and implement program to prevent ongoing recurrence of illicit discharges through sanctions and penalties applicable to those businesses and operators that have been inspected and previously cited (i.e., repeat offenders). Develop program by Year 2 and implement Year 3.*

Status: In order to prevent the ongoing recurrence of illicit discharges follow-up field investigations are conducted and the Storm Water Ordinance is utilized through escalating enforcement actions as follows. Warning Notices, Notices of Violation, Administrative Fines, and Criminal Prosecution. No recurrent discharges were found in Year 2.

Proposed Modifications: None

Planned Year 3 Activities: Implement program and measurable goals for ongoing recurrent illicit discharge program. The following are the measurable goals for implementation in Year 3. Utilize the enforcement actions provided by the County's Stormwater Ordinance to prevent the ongoing recurrence of illicit discharges by business owner and operators that have been previously inspected and cited. Utilize a systematic follow-up schedule with all businesses previously inspected and cited using Microsoft office to track the follow-up appointments.

3.6.6 Measurable Goal: *Evaluate effectiveness of abatement the program developed to prevent ongoing recurrence of illicit discharges based on enforcement activities and results. Make recommendations for improvement where inadequacies are identified; provide schedule or timetable to implement improvements (year 3-5).*

Status: To be implemented in Year 3

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Proposed Modifications: None

Planned Year 3 Activities: Resolution of recurrent discharges will be discussed in future annual reports.