

Illicit Discharge Detection & Elimination

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 ~~88-98~~ total businesses remaining to inspect starting in Year 2 as shown in Appendix 3G.

Out of the ~~88-ninety-eight~~ businesses, ~~29-twenty-nine~~ 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). An additional sixteen businesses were removed because they were enrolled in the EHS (one) or Fire Dept (fifteen) inspection programs. The overlap occurred because the different lists use different business names. However, ten of the Fire Dept businesses were inspected anyway but are removed from the Clean Water list. Of the ~~59-fifty-three~~ remaining, ~~26~~ twenty-seven routine inspections were conducted in Year 2, which meets this measurable goal of fifty-percent ($27/53=0.51$). ~~This represents 44% which is below the goal of 50% of the list.~~ Of the ~~26-twenty-seven~~ routine inspections, it was determined that ~~some businesses were inspected by Fire Department (18), some four~~ had gone out of business ~~(5) or and three were mobile businesses based from a home addresses representing mobile business (3).~~ One was a service station with food facility, inspected by EHS. Therefore, out of thirty businesses remain in the original Clean Water list for an initial routine inspection and nine the 26 routine inspections, only nine remain in the Clean Water list for reinspection in Year 3. See discussion below regarding outcome of the inspections. The list summary 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~~ routine business inspections on a more frequent basis to achieve 50% or greater to complete all remaining businesses on Year 2 list and any additional businesses identified in Year 3. ~~U; 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 a 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

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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