

3.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION

Responsible Person to Implement or Coordinate this Minimum Control Measure: County Public Works Director.

This minimum measure of the Storm Water Management Program is designed to reduce pollutants in storm water runoff to receiving waters. It requires the development and implementation of a system to identify and eliminate sources of illicit discharge and illegal dumping. As per the General Permit requirements, and also using EPA guidance including the Illicit Discharge Detection and Elimination Guidance Manual for Program Development and Technical Assessments (Center for Watershed Protection, October 2004), the County has developed a program to identify and eliminate illicit discharges throughout the permit area. The program depends on a number of partners including the public, environmental groups, and other local agencies. The specific requirements for this system are described in detail below, followed by a discussion of the existing program, including measurable goals for evaluating effectiveness.

3.1 Minimum Requirements

The General Permit establishes the following minimum requirements under the Illicit Discharge Detection and Elimination minimum control measure:

1. Develop, implement, and enforce a program to detect and eliminate illicit discharges (as defined at 40 CFR §122.26[b][2] into the regulated Small MS4);
2. Develop, if not already completed, a storm sewer system 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;
3. To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the MS4 and implement appropriate enforcement procedures and actions;
4. Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit;
5. Inform public employees, businesses, and the general public of the hazards that are generally associated with illegal discharges and improper disposal of waste.

An illicit discharge is defined as “a point source discharge of pollutants to a separate storm drain system which is not composed entirely of storm water and not authorized by an NPDES permit.” Improperly disposed of materials that enter the storm water system can cause health and safety concerns as well as other receiving water impacts. Discharge sources must be controlled and illegal behavior prevented. Controlling and eliminating illicit discharges through a comprehensive detection and abatement program can protect the public health and safety. Prevention can be enhanced through education on the hazards and consequences of illegal disposal, providing alternative disposal options and incentives, and through legal enforcement procedures. (*Fact Sheet 2.5 – Illicit Discharge Control, 01/00*)

Non-storm water discharges may be classified as illicit or exempted. The following discharges may be exempted from being regulated discharges unless they are determined to be a significant source of pollution or a nuisance (see General Permit section D[2][c][6]).

Table 3-1: Discharges Exempted from SWMP Regulation

1. water line flushing;
2. landscape irrigation;
3. diverted stream flows;
4. rising ground waters;
5. uncontaminated ground water infiltration (as defined at 40 CFR §35.2005[20]) to separate storm sewers;
6. uncontaminated pumped ground water;
7. discharges from potable water sources;
8. foundation drains;
9. air conditioning condensation;
10. irrigation water;
11. springs;
12. water from crawl space pumps;
13. footing drains;
14. lawn watering;
15. individual residential car washing;
16. flows from riparian habitats and wetlands; and
17. dechlorinated swimming pool discharges.

Discharges or flows from fire fighting activities are excluded from the effective prohibition against non-storm water and need only be addressed where they are identified as significant sources of pollutants to waters of the U.S. According to the Central Coast Water Resources Control Board, (letter dated July 8 2005 to Robert Almy Santa Barbara County Water Agency), water line flushing, potable water discharges, uncontaminated pumped ground water, and dechlorinated swimming pool discharges would likely require a waiver or low threat permit from the Central Coast Water Board.

Based on water quality sampling (see Appendix B - Additional Water Quality Measures and www.countyofsb.org/project_cleanwater for more information), creekwalks and the nature of complaints received in the last five years, the County has not identified any of these discharges to be significant contributors of pollution to the County MS4. However, where such discharges are identified by complaints or discoveries as significant contributors of pollution, the County will undertake action to abate the pollution source under existing enforcement authority (See Table 3-2 and Section 3.2.4 below), and/or future ordinance enforcement policies described below in Section 3.2.2.

3.2 Best Management Practices

Generally speaking, BMPs within this MCM fall into 1) physical description of the MS4, 2) regulations to control or prohibit potential pollutants, 3) education and enforcement to assure compliance, and 4) training of staff and business representatives in the most cost effective pollution prevention and control practices. An important dimension of this MCM is coordination among local agencies with complementary regulatory responsibilities. The responsibilities and relationships of other agencies to this Program are also discussed below.

3.2.1 Storm Sewer Mapping

As per 40 CFR 122.34(b)(3)(ii)(A), the County has prepared a storm sewer system map recording the “location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls.” In addition, the map includes surface and subsurface infrastructure in a majority of the permit area, which is not required by law.

The construction of the storm sewer map commenced in 2000 when the existing Flood Control atlas was digitized. Since this atlas had not been updated in 15 years, over 5,000 digital copies of post-1987 as-built road and flood control drawings were opened and reviewed. These were then added to the scanned atlas to create a map showing creeks, some outfalls, and storm sewer facilities where such information was available. The final portion of this phase was to convert the maps from AutoCAD to ArcView. This was done to facilitate the inclusion of the information in the County’s existing Geographic Information System (GIS). The total cost of this phase of the mapping project, completed in late 2001, was over \$69,000.

During annual creekwalks in 2001, Project Clean Water staff mapped all visible outfalls greater than two inches in diameter. This was done for all sections of those creeks within the permit area, as well as some sections outside the permit area. During this cataloging effort, 664 outfalls were recorded along with information such as latitude, longitude, size and material of the pipe and whether water was flowing from the pipe. The approximate cost of this portion of the project was \$5,000.

Another set of data that became available following the 2000-2001 mapping effort was the location (sub-meter accuracy) of most of the drop inlets, manholes, headwalls, and other structures related to water conveyance. The effort to catalog and locate these structures was undertaken by the Roads Division at the County of Santa Barbara in response to General Accounting Standards Board (GASB) Statement 34 requirements.

The County of Santa Barbara attempted to fill in some of the “holes” in the existing data by having another consultant view the inside of pipes with a remotely controlled television camera. Due to the numerous difficulties involved with this technique (e.g., locked manholes, presence of rocks or other debris etc.), only 11,000 feet of pipe were cataloged in Goleta, Isla Vista, and Orcutt, at a cost of almost \$20,000.

In 2002, another consultant was hired to bring together data from the 2000-2001 mapping effort, the 2001 creekwalks, the GASB 34 data, and as many of the pre-1987 “as-built” road and flood control drawings that could be opened given the limited budget. The product of this phase of the mapping effort is a map that shows all creeks and streams, all major and most minor outfalls, and many of the storm sewer facilities that connect above-ground runoff with the aforementioned outfalls. The total cost of this phase of the mapping project was just under \$40,000.

Since the 2002 mapping effort, 20 new outfalls have been added to the database as a result of observations during annual creekwalks. There are also many more road and flood control as-built digital files that have not been opened and the information transferred to the storm sewer maps due to insufficient monetary resources. This source of information contains both those projects that existed before the completion of this phase of mapping and those projects completed since. In the future, these data sources will be reviewed and the information contained within shall be added to the existing maps as monetary resources become available.

Electronic and hard copy versions of the current maps are available in the offices of the County Public Works Department, Water Resources Division.

Public Works staff will maintain and update this database as new information is made available, through creekwalks, complaints and discoveries, or new development.

3.2.2 Storm Water Ordinance

In 1999, the County evaluated relevant laws, ordinances and policies that effectively regulate the quality of surface waters through pollution prevention and enforcement against the unpermitted discharge of liquid waste, and illegal disposal of solid waste. Results of this evaluation, conducted by County Counsel and reviewed by an independent Project Clean Water Stakeholder working group, indicated that the current regulations are adequate to protect water quality through the prohibition, enforcement and abatement remedies that they encompass. Although these ordinances have been sufficient to meet storm water protection objectives, the stakeholder working group suggested some improvements, including greater enforcement, better public awareness to improve reporting of violations, and better coordination among enforcement agencies. Staff members have worked to improve the effectiveness of enforcement, awareness, and coordination since that time. A re-evaluation of current practices was completed in FY 2003-04 to determine if additional improvements can be made. It was determined that a Storm Water Ordinance would provide additional improvements.

In June 2004, a draft discharge ordinance was circulated for public review following several public workshops. It is expected that the ordinance will be adopted prior to or in any event no later than Year 1. This draft ordinance is based on an evaluation of the scope of existing ordinances, the extent of revisions to the County grading ordinance and the level of success of addressing illicit discharge under existing regulations. Existing regulations were evaluated in the context of the draft storm water ordinance to ensure that they did not conflict, interfere with, duplicate or negate existing law and enforcement by all appropriate County departments. Upon adoption, County will effectively implement and enforce the Storm Water Ordinance to fulfill the requirements of the General Permit.

Additional authority for detection and elimination of illicit dischargers and illegal connections are referenced or described in:

- Adoption of “conditions of approval” for new development projects. Per AB 3180 (PRC 21081.6), the County’s Planning and Development Department has established a program to monitor CEQA mitigation measures adopted as conditions of approval on new development projects. (See Appendices F and G)
- County Grading Ordinance, which includes preparation and implementation of erosion control plans (See Appendix G)
- Comprehensive Plan Elements: recent updates have been primarily in the form of Community Plans for Goleta, Montecito, Summerland, Los Alamos, and Orcutt. The Toro Canyon Plan is complete, and preparation of the Santa Ynez Valley Plan is underway.

Where water quality impacts are anticipated, new developments are required to participate in riparian and/or wetland restoration. Creek restoration plans are included in the County Planning and Development Department’s Standard Conditions and Mitigation Measures. Additionally, water quality issues that may impact storm water issues are addressed in the legal references shown in Table 3-1.

Once the ordinance is adopted, the County will evaluate its effectiveness in consultation with interested stakeholders. For example, improved enforcement and better coordination amongst enforcement agencies will be reviewed since they were identified as areas warranting further improvement. Criteria may include ability to achieve measurable goals and community and regulatory agency feedback. Additional funding sources for enforcement, if necessary, will be provided to the appropriate departments.

The evaluation will also consider prevention of illicit discharges through other County regulations. For example, an ongoing evaluation of options for a specific septic system maintenance ordinance shall be completed, as discussed in the report prepared by the septic system working group and currently being managed by EHS. Evaluation will include a periodic review and update of the County General Plan policies and the local Coastal Plan policies that address discharges into sensitive receiving waters.

Table 3-2: Legal References

The following legal references may be accessed in a law library or on the internet at the following locations:

Federal laws: <http://www.epa.gov/docs/epacfr40/chapt-I.info/subch-D.htm>

California codes: <http://www.leginfo.ca.gov>

California Code of Regulations: www.calregs.com

County codes: <http://bpc.iserver.net/codes/stbarb/index.htm>

Animal waste

County Code Chapter 17 Solid Waste

County Code Chapter 26 Parks & Recreation

Health and Safety Code §§5410 et.seq.

Water Code §§13000 et.seq.

Fish and Game Code §§5650 et.seq.

Penal Code §§374.3 et.seq.

General dumping of trash

County Code Chapter 17, Solid Waste

County Code Chapter 24 Prohibition of Dumping in Watercourse

Health and Safety Code §§5410 et.seq.

Health and Safety Code §§117550

Water Code §§13000 et seq.

Fish and Game Code §§5650 et seq.

Penal Code §§374.3 et seq.

Liquid discharge from mobile carpet cleaners

County Code Chapter 17, Solid Waste

Health and Safety Code §§5410 et seq.

Water Code §§13000 et seq.

Fish and Game Code §§5650 et seq.

Penal Code §§374.3 et seq.

Dumping of human waste from recreational vehicles

County Code Chapter 17

County Code Chapter 24

County Code Chapter 26 Parks & Recreation

Health and Safety Code §§5410 et seq.

Health and Safety Code §§117550

Water Code §§13000 et seq.

Fish and Game Code §§5650 et seq.

Penal Code §§374.3 et seq.

Dumping of hazardous materials

County Code Chapter 17

Health and Safety Code §§25100 et seq

3.2.3 Education & Outreach

Experience has shown that the most effective action in the elimination and prevention of illicit discharges is the education and cooperation of a concerned public. Education is the primary tool of compliance activities; PCW has developed a number of brochures that address illicit discharges and appropriate actions for eliminating these sources of pollution. The efforts for educating the community about controlling illicit discharges, listed below, are discussed in greater detail in Section 1.0 Public Education and Outreach and are described in Appendix C Project Clean Water Public Education & Outreach Materials.

- Project Clean Water website (www.countyofsb.org/project_cleanwater)
- Water Quality Hotline (1-877-OUR-OCEAN)
- Business outreach
- Restaurant Recognition Program
- Brochures
- Public events
- Media campaigns
- South Coast Watershed Resource Center
- Hazardous Materials Collection Program

In general, illicit discharges occur because of a lack of awareness on the part of the discharger. Often, simply pointing out the error and suggesting BMPs to be used in the future are enough to convince businesses and homeowners to cease discharging, dumping or to eliminate the illegal connection. In most cases the individual responsible can be motivated to do the right thing, and will implement appropriate BMPs. Targeted information brochures have been developed for creek-side residents, owners of domesticated animals, and businesses to educate them on appropriate BMPs to reduce these illegal discharges.

3.2.4 Identification and Elimination of Illicit Discharge Sources

In order to maximize the limited resources available, potential sources of illegal dumping and illicit connections are identified and prioritized based in part on public access and contact to the area (or storm drain), and characterization of nearby land uses as industrial, commercial and older residential areas. In addition, the sources shown in Table 3-3 will be evaluated on an on-going basis for their potential impacts to the storm water quality within county watersheds.

The County's existing program for identification and elimination of illicit discharge sources is comprised of two parts:

1. Spill and Complaint Response
2. Field Investigation and Abatement

These two program elements are discussed in more detail below. EHS, Planning and Development, Flood Control/Water Resources, the Parks Department, the Fire Department, the Sanitary Districts and other agencies are engaged in detection and elimination of illicit discharge activities.

Table 3-3: Potential Illicit Discharge Sources

Accidents <ul style="list-style-type: none"> • Spills of Vehicle Fluids (antifreeze, gas, oil, grease, hydraulic fluids, lubricants) • Glass • Asbestos Brake Fibers 	Illicit Connections <ul style="list-style-type: none"> • Residential • Commercial • Industrial
Auto Dealers	Illegal Dumping <ul style="list-style-type: none"> • Solids • Liquids
Auto Shops	Industrial Cooling Water
Auto - Residential Cleaning	Oil Drips/Fuel Leaks (new/used)
Businesses Washdown	• Commercial
Commercial Irrigation	• Residential
Construction	• Apartments
Sediment	Paint
Asphalt Cuttings	Parking Lots
Carpet/Residential Cleaning	Pools and Spas
Cement Washing	Residential
Equipment Cleaning	• Gray Water
Food Facility Cleaning <ul style="list-style-type: none"> • Facility Cleaning - gray water • Cooking Equipment - grease, oil and hazardous cleaning agents • Grease Trap • Dumpsters 	• Hazardous Materials
	• Pesticides
	• Fertilizers
	• Sediments
	RV Waste
	Sewage Spills
Gas Stations/Vehicle Service Stations	Septic Spills
Car Wash	Sumps/Dewatering

Spill and Complaint Response

Complaint response is an important aspect of the illicit discharge discovery and abatement process. Many complaints on water quality issues are received and evaluated by the PCW staff. PCW staff respond directly to complaints that relate to the storm water program; some complaints may fall under the jurisdiction of other county departments or agencies. Referral of these complaints is made to the appropriate agencies with a request to respond to the complainant on the action taken.

The following procedures are used by PCW to address the ongoing identification and abatement of illicit discharges:

- Receive complaint or notice of the spill, discharge or illegal connection. Complaints are often received from other County staff, community groups who are concerned about illicit discharges and/or through the Project Clean Water Hotline at 1-877-OUR-OCEAN. Calls are referred to the appropriate agency for response; the hotline call referral system is outlined in Appendix D.
- Respond to 100% of all complaint or notification calls to County within 24 hours. Where enforcement or follow-up is referred to and conducted by an agency or entity outside of County government (i.e., water district, school district, California Department Fish & Game, RWQCB), County will verify their course of action within three working days, and maintain the outcome of that referral in the Project Clean Water database.
- Identify the potential source of the discharge.
- Track the spill/discharge to source.
- Use education and enforcement to eliminate the discharge to the storm drain/sewer or ground surface.
- Apply BMPs if applicable to assure on-going compliance.
- Conduct follow-up inspections to assure that discharge has been eliminated.
- Maintain records of response in the Project Clean Water database to establish a database, and to identify recurrence patterns.

The County will review these 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.

Field Investigation and Abatement

Field investigations occur on a scheduled basis and are conducted by County staff representing Project Clean Water and the Santa Barbara County Flood Control District. Follow-up on discoveries of illicit discharges is the responsibility of the County or other state official such as Fish and Game or the State Water Resources Control Board, as shown by the legal references in Table 3-2. The following steps outline the County's role in investigating and abating illicit discharges:

- Identify and prioritize areas of potential illicit discharges and/or illegal connections for residential, commercial, and industrial locations based on the criteria described in the paragraphs below.
- Conduct annual creekwalks to identify potential sources.
- Conduct field/manhole/site inspections.
- Verify illicit discharge/illegal connection and identify the source.
- Use education and/or enforcement to eliminate the discharge to the storm drain/sewer or ground surface.

- Apply BMPs if applicable to assure on-going compliance.
- Maintain records of response to establish database and to identify recurrence patterns.

In order to prioritize and focus resources in areas most likely to cause illicit discharges, two programs will be established. The first will address potentially polluting businesses and operations that are not regulated or are not being inspected on a routine basis. The goal of this program will be to remove sources of illicit discharges to the storm drain system. This will include but not be limited to mobile auto detailers. At a minimum, this program will include (1) criteria to prioritize businesses and operations within the permit area that may be a source of illicit discharges, (2) a targeted education and outreach component that addresses follow-up procedures, (3) a schedule for routine inspection, follow-up, and, if necessary, enforcement actions, and (4) measurable goals for the number of businesses and operations to be inspected. A description of this program, including measurable goals, will be developed by the end of Year 1 and implemented in Year 2. Measurable goals will include annual routine inspection of 50% of the prioritized businesses and operations that may be sources of illicit discharges.

The second program will address those businesses and operators that have been inspected and were cited or educated about illicit discharges. The goal of this program will be to prevent ongoing recurrence of illicit discharges. At a minimum, this program will include (1) a method to identify those businesses cited or contacted regarding violation of discharge regulations (i.e. Health and Safety Code), (2) follow-up efforts such as a targeted education and outreach component, (3) a record-keeping system to track and schedule follow-up efforts including inspections and as appropriate, enforcement, and (4) measurable goals. A description of this program, including measurable goals, will be developed by the end of Year 2 and implemented in Year 3.

Creekwalks. Since Project Clean Water was founded in 1998, each creek on the south coast that passes through the urban area had been walked from top to bottom each year. Creeks that were walked from 2001 through 2004 by Project Clean Water within the permitted area and by Flood Control District staff, including creeks outside of the permitted area, are shown in Appendix J.

During these creekwalks, Project Clean Water staff recorded the location of homeless encampments, greenwaste dumping, excessive animal excrement and other sites where water quality could be significantly impacted by human activities. Information from these creekwalks was entered into the PCW Geographic Information System (GIS) database for future analysis.

Prior to creekwalks in the 2005 season, staff used the GIS to target the creekwalking effort. Each section of creek was evaluated based on the following questions:

- Is the section located within another city's jurisdiction?
- Is the section located on private property?
- Does the section pass through agricultural property?

Sections of creek where any of these questions were answered positively were removed from the creekwalk rotation. To determine the potential pollution that staff might encounter on future creekwalks, each section was then evaluated based on the following criteria:

- Number of previous discoveries (none → many)
- Creek use (light → heavy)
- Channelization (yes, no)
- Vegetation (light → heavy)

Creeks where many discoveries had been made, where access to the creek was easy, and where vegetation in the channel was light were assigned a more frequent number in the creekwalk rotation.

This targeted approach allows staff to walk creeks in a more efficient manner. Considerably less time will be spent bushwhacking through extremely dense vegetation where the potential for discovery of problem areas is minimal and historically no problems have been found. This will allow staff to visit section of the creek where dumping and pollution occur on a regular basis (e.g., bridges, heavily used access points). The County will inspect these priority areas on an annual basis.

Also, staff from the County of Santa Barbara's Flood Control walk many of these same creeks annually. These staff report potential water quality problems to Project Clean Water staff for follow-up. This two-pronged approach ensures that many of the creeks are walked twice a year, while some sections of difficult to access creeks where water quality problems are not expected and have not been found in the past are walked every two to three years.

Hazardous Material Inspections. The County of Santa Barbara Fire Department currently conducts an inspection program that includes facilities that handle and/or store hazardous materials and wastes. Each facility is inspected on a routine basis for compliance with very stringent hazardous material laws. Included in this inspection is a review of the facility's business plan, general hazardous material and hazardous waste handling and storage operations, procedures, and general housekeeping issues related to strict control of the materials. Hazardous waste complaints, spills and accidents are responded to by the Fire Department. The incident is abated and cleanup assured. Non-compliance issues are handled with the opportunity to correct the violation, education of the persons involved, and progressive enforcement where necessary, including fines and potential incarceration.

NPDES Regulated Facilities. Industrial facilities that hold waste discharge requirements from the RWQCB are inspected by this agency for compliance with their discharge permits. Non-compliance with the facility permit results in an enforcement process that includes correction of the violation, education, fines and potential incarceration in some cases.

Enforcement of existing policies and ordinances is crucial to the effort of maintaining water quality in the creeks and oceans. PCW has established a "single point" system for reporting water

quality problems, tracking follow-up, and ensuring enforcement of water quality policies/ordinances. These efforts include a water quality reporting hotline (1-877-OUR-OCEAN), coordination among various enforcement agencies and personnel, and increased report follow-up.

The initial approach to prevention and elimination is education on what the pollution source is, what effects it has on our watershed and how the problem may be eliminated through BMPs. When necessary, education can be used in combination with legal enforcement to achieve elimination of the illicit discharge.

In addition to complaints, the scheduled creekwalks conducted in each watershed identify places where solid waste has been discarded into the creek or along the creek banks. To address these issues, letters and informational brochures are sent to property owners whose parcels are clearly identified as a source of contamination. For example, if a large pile of greenwaste is seen directly on the creek bank behind a home, a letter would be sent to the owner of that parcel explaining the impacts greenwaste has on water quality and outlining alternative methods of disposal or composting of greenwaste. Brochures, such as “Gardener’s Guide to Clean Water”, “Creekside Concerns”, “A Dog-Owner’s Duty”, and “Helpful Hints for Horse Owners” are included in the letter as appropriate.

Educating the general public, business owners, industries, school children, teachers, and regulatory personnel on the hazards associated with illegal discharges and improper disposal of waste is being accomplished in a number of ways. A detailed discussion on storm water educational outreach and participation is provided in Sections 1.0 and 2.0 of this document.

County Department Roles and Responsibilities. Activities to identify and eliminate illicit discharges are summarized by department below:

Project Clean Water: PCW staff respond to complaints regarding water quality throughout the year. Response occurs within 24 hours of notification. Complaints range from illegal dumping of trash, horse manure and greenwaste in the creeks, to the illegal disposal of liquid waste from RVs, mobile carpet cleaners, and disposal of washwater.

Complaint response may be the responsibility of another agency (i.e. California Department Fish and Game, California Water Resources Control Board) or may require the cooperation of many agencies. Callers are not always aware of the unincorporated area boundaries or of the agency responsible for follow-up, so a call referral system has been established so that calls can be efficiently redirected to the correct agency.

County Environmental Health Services (EHS): Another program that abates illicit discharge violations is the EHS Community Health Program. District 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. EHS has expanded their normal inspection techniques (such as time and temperature controls for perishable foods) to include storm water management activities. For example, it is a violation to

wash restaurant floor mats or dispose of washwater outside where it would discharge into the storm drain system.

Annual inspections are performed at all licensed facilities, which represents approximately 1789 facilities Countywide. (Any facility that sells or gives away food products is regulated by the County.) Most facilities are inspected more than once due to follow-up site visits where violations are noted, or due to complaints directed to EHS. Where violations occur, either a verbal or written notice of correction is provided and a reinspection occurs within 24 hours or up to two weeks, depending on the nature of violation. Notices of violation may also be issued for repeat offenders. Actions can include but are not limited to clean-up and abatement, misdemeanor penalties (up to \$1,000 per day), revocation of their health permit, or imprisonment of not more than 6 months in jail. Pertinent regulatory authority over unauthorized discharges is defined in Health & Safety Code Sections 5411, 114035, 114100, and 114165.

Due to increased public awareness, EHS has received a greater number of complaints associated with unlawful discharges from permitted food facilities. Illegal activities include floor mat and floor wash-down discharge to storm drains. EHS responds to each complaint and takes appropriate enforcement action. The appropriate Health and Safety Code authority is cited for each violation and abatement obtained.

EHS has also cooperated with the staff of PCW and the Cities of Santa Barbara, Goleta and Carpinteria to create an outreach and recognition program for restaurants that have established good operational practices to prevent the discharge of liquid waste off-site and into storm drains. This program is described in Section 1.0 Public Education and Outreach.

Furthermore, EHS commissioned the Septic System Sanitary Survey in 2001. This effort is described in greater detail in Appendix B Additional Water Quality Measures.

EHS Liquid Waste Program: This program investigates and abates liquid waste discharge violations. Illegal and/or illicit discharges of liquid waste onto the ground surface and/or into the storm drain collection system may be the result of discharges from faulty sewer laterals, leaking sewer mains or failing septic systems. Correction notices are issued to owners of deficient septic systems, requiring them to make repairs or upgrades as necessary to meet current septic system sanitary standards. Inspections to ensure remediation of the problem may be made by EHS and/or Planning and Development's Building & Safety staff.

In an effort to prevent illicit discharges from faulty septic systems, in April 1999, EHS revised Chapter 29 of the County Code to include mandatory reporting of septic system servicing and inspection. This ongoing reporting system of voluntary septic system servicing reveals operational problems in existing septic systems. These systems are required to make repairs or modifications to meet minimum operational sanitary standards. EHS has regulatory authority over individual septic systems, including the authority to require repairs, modification or replacement.

EHS Authority from County Code
CHAPTER 29 SEWERS, Article II. On-Site Sewage Disposal Systems
Sec. 29-7. Definitions. Unless the context requires otherwise, the definitions set forth in this section shall govern the construction of this article.
(b) "Administrative authority" means the director the environmental health services division of the Santa Barbara County public health department, or a duly authorized representative

Concurrent with the efforts described above, EHS is supporting the efforts of several local community groups (e.g., Heal the Ocean, CURE, etc.) to provide incentives to parcel owners using septic systems in problem areas to convert their systems to sanitary sewer (See also the discussion of sanitary district programs in Section 3.2.5).

County Fire Department: As of December 31, 1996, Cal-EPA certified the Santa Barbara County Fire Department as the designated Certified Unified Program Agency (CUPA) for Santa Barbara County. As such, the CUPA is responsible for the administration of hazardous materials and hazardous waste programs consolidated under one agency within Santa Barbara County (see County Code Table 3-4). The Santa Barbara County Fire Department has organized these duties under the Fire Prevention Division. Other Fire agencies, in Santa Barbara County, act as Participating Agencies. The Fire Prevention Division oversees and regulates those businesses associated with the programs mentioned below, while the Participating Agencies oversee inspections of business that fall within the Business Plan Program within their own Fire jurisdictions.

The CUPA programs organized in the Fire Prevention Division include the following:

- Hazardous Materials Inventory and Business Plan Program
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (Tiered Permitting) Programs
- Underground Storage Tank Program (UST)
- Above Ground Storage Tank, Spill Prevention Control & Countermeasure Plan (AST / SPCC) Program
- California Accidental Release Program (Cal-ARP)
- Leaking Underground Fuel Tank (LUFT) Program
- Site Mitigation Unit (SMU) Program.

As the designated CUPA, the Fire Department's Fire Prevention Division is responsible for inspecting facilities and monitoring their compliance with hazardous materials regulations for best management storage practices and spill response. If necessary, the CUPA proceeds with enforcement activities to gain compliance as needed (see below).

Fire Prevention Division also responds to all hazardous materials complaints and emergency responses for spills throughout the county. For example, if Project Clean Water staff receive a complaint (e.g. from the hotline), and initial inspection indicates a potential for hazardous materials, staff would redirect response to Fire Prevention for follow-up.

Businesses that handle amounts of hazardous materials equal to or greater than the regulated threshold quantities must submit annual hazardous materials Business Plan updates with inventory information to Fire Prevention Division. Hazardous Material / Waste Generators, UST, and AST/SPCC facilities are required to obtain permits and are inspected to ensure their compliance with the pertinent hazardous materials programs. Permit conditions typically require:

- Employee training;
- Appropriate handling, storage, and disposal; and
- Reporting of hazardous materials and wastes including plans for the containment of spills and the procedures to be followed in the event of a spill.

The Cal-ARP Program is intended to prevent the release of toxic or flammable/explosive materials that could cause harm to the public or the environment, and to ensure there are proper mitigation measures in place should a release occur. A facility that utilizes over a specified threshold quantity of one of these regulated substances may be required to prepare a Risk Management Plan. The County Fire Department is responsible for inspection of Cal-ARP facilities and the review, approval, and enforcement of the Risk Management Plan.

When chemical/waste releases are found during inspections, inspectors direct facility operators to stop illegal waste/hazardous waste discharges, to legally clean up affected areas, and to prevent future discharges of wastes. Inspectors also refer releases, when appropriate, to the SMU/LUFT section and to other agencies as appropriate.

Fire first responders and the hazardous materials response team may make a spill response depending on the hazard level and severity of the spill. Emphasis is made on containment and cleanup with public health and safety as the foremost consideration in an environmentally sensitive manner.

Another program under Fire Prevention Division is the Site Mitigation Unit (SMU) Program. This program provides oversight for the assessment and remediation of hazardous materials releases that are not associated with underground storage tanks, including all other types of hazardous materials spills. Fire Prevention Division follows guidance and works closely with other agencies including the State Water Resources Control Board, the Regional Water Quality Control Board, the Department of Toxic Substances and Control, and the County Planning Department, that have oversight responsibility concerning assessment and remediation of each site. Thus, while Fire Prevention Division inspects the sites, if potential contaminants to storm

water runoff are identified, it may issue immediate notices to correct and refer the incident to other agencies as appropriate.

California Department of Toxic Substances Control has concurrent authority to bring administrative action for hazardous material/waste violations. For minor violations, the first step in enforcement is to instruct the violator to remedy the violation. If the violator does not immediately do so, Fire Prevention Division would issue the violator a Notice to Comply. If the violator comes into compliance within thirty days and sends the agency certification of compliance, there is no further enforcement action. The statute does not diminish in any way the enforcement agency authorities to penalize or enjoin violations that are not minor violations. Provisions relating to minor violations of water quality requirements are codified in State Water Code §§ 13399-13399.3. Specific limitations in the statutes for all three programs circumscribe the scope of the minor violation and give broad discretion to state and local agencies to enforce hazardous waste and water quality requirements.

County Parks Department: The Mutt Mitt program consists of providing pet waste disposal bags at various County parks and open spaces for use by the public. This program has been successful in reducing pet waste pollution. The County evaluates new stations and more visible signage at various county parks and trails as needs are identified. Over 117,000 Mutt Mitts were distributed at County parks in the first year of the program. The Parks Department facilities and operations are discussed in Section 6.0 Pollution Prevention/Good Housekeeping.

Table 3-4: CHAPTER 15 FIRE PREVENTION Article VII. Fire Department Administration of Hazardous Materials/Wastes Laws

<p>Sec. 15-128. Successor of authority.</p> <p>(a) The fire department succeeds to and is vested with the duties, purposes, responsibilities and jurisdiction, imposed by law or contract or memoranda, heretofore exercised by environmental health services, health officers, local health officers or county health departments as defined in state law and the Santa Barbara County Code and ordinances as they relate to hazardous materials, hazardous substances and hazardous wastes, including, but not limited to, the following state laws, together with their implementing regulations, and the following provisions of the Santa Barbara County Code and ordinances:</p> <p>(1) Chapter 6.95 (Hazardous Materials Release Response Plans and Inventory), §§ 25500 et seq., of division 20 of the Health and Safety Code;</p> <p>(2) Chapter 6.7 (Underground Storage of Hazardous Substances), §§ 25280 et seq., of division 20 of the Health and Safety Code;</p> <p>(3) Chapter 6.75 (Petroleum Underground Storage Tank Cleanup), §§ 25299.10 et seq., of division 20 of the Health and Safety Code;</p> <p>(4) Chapter 6.5 (Hazardous Waste Control), §§ 25100 et seq., of division 20 of the Health and Safety Code;</p>	<p>(5) Chapter 6.11 (Unified Hazardous Waste and Hazardous Materials Regulatory Program), §§ 25404 et seq., of division 20 of the Health and Safety Code;</p> <p>(6) Chapter 6.65 (Unified Review of Hazardous Materials Release Sites), §§ 25260 et seq., of division 20 of the Health and Safety Code;</p> <p>(7) Chapter 6.67 (Aboveground Storage of Petroleum), §§ 25270 et seq., of division 20 of the Health and Safety Code;</p> <p>(8) Chapter 6.8 (Hazardous Substance Account), §§ 25300 et seq., of division 20 of the Health and Safety Code;</p> <p>(9) Article III (Hazardous Materials Storage Ordinance), §§ 18-21 et seq., of chapter 18 of the Santa Barbara County Code;</p> <p>(10) Article IV (Hazardous Waste Generator Ordinance), §§ 18-30 et seq., of chapter 18 of the Santa Barbara County Code; and</p> <p>(11) Article VI (Reporting Requirements), §§ 18-41 et seq., of chapter 18 of the Santa Barbara County Code.</p> <p>(b) Chapter 6.6 (Safe Drinking Water and Toxic Enforcement Act of 1986), §§ 25249.5 et seq., of division 20 of the Health and Safety Code; and article VII (Monitoring), §§ 18-49 et seq., of chapter 18 of the Santa Barbara County Code, are excluded and excepted from the transfer of authority of hazardous materials, substances, and wastes laws and regulations to the fire department. (Ord. No. 4215, § 1; Ord. No. 4494)</p>
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3.2.5 Sanitary District Programs

Co-operation with other concerned agencies to detect and eliminate illicit discharges and illegal connections enhances the effectiveness of illicit discharge control. Districts that serve unincorporated areas are essential partners in the County's NPDES SWMP. County staff coordinates closely with local sanitary districts on such issues as:

- Illicit discharge detection
- Regional water quality monitoring
- Incentives for septic to sewer conversions
- Geographical Information System data sharing

In an effort to further improve water quality and public health, each district has policies providing for conversion of parcels served by septic systems to those served by the sanitary sewer. Such policies include the annexation of areas outside their service districts.

Goleta West Sanitary District

The Sanitary District Act of 1923 gives the District broad powers for sewage and storm water systems collection and disposal within the District. The District has maintained programs to protect storm water quality, including a street sweeping program, since 1961. The District has become involved with Project Clean Water in order to support the County and City of Goleta in their long term NPDES Phase II Permit activities. Some areas in which the District has agreed to work with PCW include:

- Determining whether existing street sweeping programs can be improved to maximize water quality benefits;
- Locating and reporting illicit connections to the storm drain system;
- Continuing the District's municipal BMPs (maintain good housekeeping practices and eliminate potential District sources of pollution and contamination of the creeks and ocean);
- Continuing the District's Collection System Maintenance program to locate and seal leaking pipes; eliminating cross-connection locations, locating and eliminating illegal connections to the storm water systems; and
- Continuing to develop a program for public involvement, building upon the work established by PCW to eliminate illicit discharges and illegal connections.

Goleta Sanitary District

Rapid growth in the Goleta Valley since 1965 required an expansion of the treatment plant which now serves 25 times the number of people it served when it was founded. The Goleta Sanitary District treatment facilities are utilized by four public agencies: Goleta West Sanitary District, University of California at Santa Barbara, City of Santa Barbara Municipal Airport, and certain facilities of Santa Barbara County. The District's collection system serves the Airport, eastern portion of the City of Goleta and the unincorporated area between the cities of Santa Barbara and Goleta.

The Goleta Sanitary District utilizes a number of new technological tools to facilitate an ongoing maintenance program for the District's sewer system. This program reduces the potential for domestic and industrial waste to be discharged to creeks, storm drains, and groundwater. Goleta Sanitary District also employs procedures designed to discover illicit discharges and illegal connections to the storm sewer system. These include:

- Good housekeeping and preventive maintenance of facility equipment and machinery to capture and prevent spills and discharges;
- Smoke testing of the District's sewer system. Smoke testing is used to detect interconnections (cross connections), and leaks between the sewer system and the storm drain system, groundwater, and creeks. The District also performs smoke testing to detect illicit storm drain connections to the sewer, including residential rain gutters and other hard piped connections directing surface runoff to the sewer. Diverting storm water discharge away from the sewer prevents sewer overflows to storm drains and creeks in wet weather conditions;
- Closed circuit television video of sewer lines is part of the ongoing program to assess the condition of the sewer lines. As part of the maintenance program, the District can prioritize problem areas and detect and fix leaks, plugs, root balls, oil and grease buildup, and replace aging sewer lines;
- Use of a Geographic Information System (GIS). Goleta Sanitary District closely monitors the sewer system using a computerized database and mapping GIS. The GIS contains data on location, age, size and construction of the pipelines and is used to develop maintenance plans for the 127-mile pipeline system to treat problematic areas on a priority basis. Preventive maintenance reduces spills and accidental breaks and thus reduces discharges to the storm water system; and
- Development of public education programs. The District holds workshops for contractors, plumbers, engineers, other industrial and professional groups and classes for young people to teach them about the hazards of illicit discharges and illegal connections.

Laguna County Sanitary District

The County of Santa Barbara Solid Waste & Utility Division's largest utility responsibility is the Laguna County Sanitation District, which operates a wastewater treatment plant serving the unincorporated community of Orcutt and portions of southern Santa Maria. The plant is located at the end of Dutard Road west of Black Road. The District serves approximately 11,700 connections and collects, treats and disposes of 2.4 million gallons of wastewater per day. Wastewater is generated primarily from domestic sources with minor contributions from commercial establishments but does not include storm water collection. The District maintains one pump station and 155 miles of collection sewers. All of the water is recycled and used for irrigation purposes on over 620 acres of pasture land.

To meet Central Coast Basin Plan requirements and permit conditions as well as to broaden disposal alternatives, the District has initiated several improvements. The proposed improvements include new treatment processes to improve effluent quality to tertiary levels. Technologies such as reverse osmosis to remove dissolved solids, ultrafiltration and ultraviolet disinfection are employed. Because water is a precious commodity, the effluent is distributed and sold as recycled water for landscape irrigation.

The District conducts routine flushing of the entire collection system every two years. In addition, maintenance is provided on a regular basis for older portions of the system. Pipeline video inspection is done routinely to further assess the system's condition. Known trouble spots are then identified for repair. At this time, the District has only a few minor industrial discharges and does maintain a set of requirements for pretreatment for these facilities.

Because this District is a part of the County, operations at the facility have been evaluated under municipal operations (see Section 6.0). Therefore, BMP implementation, reporting, and record keeping will be consistent with all County departments, as described in Section 6.0.

Carpinteria Sanitary District

Carpinteria Sanitary District began handling liquid waste in their district in 1929. Today the District covers approximately 2.4 square miles with 39.5 miles of sewer lines that carry 620,000,000 gallons of wastewater for treatment each year in the Carpinteria City area. The District serves 580 businesses and three industrial facilities.

PCW has been coordinating with and supporting the Carpinteria Sanitary District as it seeks to fund septic system to sewer conversion projects. By converting from septic to sewer, potential discharges from poorly functioning septic systems will be eliminated.

In order to discover potential illegal connections, the Carpinteria Sanitary District investigates complaints, referrals, and suspicious drain connections, and conducts smoke testing of the sewer lines. Line maintenance is scheduled by a computerized system and lines are also inspected in their closed circuit television (CCTV) inspection program.

The District also issues permits to grease generators and conducts annual inspection of these generators, the majority of which utilize grease traps. The District also monitors the cleanout process for grease interceptors.

Employee education is conducted regularly through in-house training, association conferences, and training seminars.

Santa Ynez Community Services District

The Santa Ynez Sanitary District has provided sanitary sewer collection, treatment and disposal services to the community since 1979. The District primarily serves residential customers but includes 60 businesses and no industrial facilities. Approximately 103 million gallons of wastewater are treated each year by the District.

The District ensures that wastewater is collected and retained in the system by conducting ongoing routine inspection of manholes, sewer lines, pump stations, generators, filters and other components of the system. The lines are checked in the early morning (1-3 a.m.) to check for infiltration and intrusion. Filters are changed out regularly, the stations are cleaned and the alarm systems are checked and/or tested. Backup generators are also exercised to ensure that they will be ready in case of an emergency. All maintenance activities are conducted to ensure that no surface runoff occurs and wastewater is discharged back into the sewer system.

The District also evaluates the integrity of the sewer lines by running a television camera through them and flushing them periodically. In order to detect illicit discharges, smoke testing is conducted and wastewater flow volume is monitored. Unusually high flows in wet weather conditions are investigated to determine the cause and abated when necessary.

All grease traps in the District are inspected every two months or more often if there are problems. Facilities with grease traps are required to submit maintenance schedules and proof of service. Regular inspection of the lines is conducted and "hot spots" are identified for extra monitoring frequency. During inspections, if graywater is noted, County of Santa Barbara, EHS is contacted and a referral of the problem is made. Commercial businesses that use exchange system water softeners are also checked by the District for proper hookup and operation.

Spill response is covered by all operations staff on a rotational basis and the District Manager receives the pump station alarms. Appropriate agencies are notified promptly if there is a spill and a report is dispatched to them. Spills are contained and cleaned using a vacuum truck followed by thorough disinfection of the affected area.

Community support and involvement in keeping the environment free of wastewater is important to the District. Educational materials are provided to septic system owners to help them understand and care for their systems. Homeowners may also obtain information on the care of water softeners. Business operators are provided with information on why a grease trap is required, and the maintenance requirements to avoid sewage backups.

Montecito Sanitary District

The Montecito Sanitary District provides sanitary sewer collection, treatment and disposal services to approximately 9,500 people in the unincorporated Montecito area of the County. The District primarily serves residential customers, approximately 54 businesses, and no industrial customers.

The District boundary includes approximately 448 properties that are currently on septic systems with no sewer mains in the near vicinity. Additionally, there are approximately 99 properties

that have chosen to remain on septic systems, even though sanitary sewer service is available. The District has not mandated property connection to the sanitary sewer system. Throughout 2000 and ending in 2001, the District offered a reduced sewer connection fee, as an incentive to encourage people to convert from septic to sewer. By converting from septic to sewer, potential illicit discharges from poorly functioning septic systems are eliminated. Although reduced connection fees are no longer available, the District Board approved a Septic Tank Abandonment Program that provides limited funding to sewer main extension projects.

Routine maintenance programs have been initiated to prevent potential sewer spills. These maintenance activities are performed by highly qualified staff that is on call 24 hours a day, every day of the year, to respond to sewer complaints, concerns or emergencies. Routine maintenance activities include regular cleaning of the collection system, in addition to the following:

- Good housekeeping and preventive maintenance of facility equipment and machinery to prevent and capture spills and discharges;
- Smoke testing of the sewer collection system. Smoke testing is used to detect undesirable interconnections and leaks between the sewer system and the storm drain system, groundwater and creeks. Smoke testing may also detect illicit storm drain connections to the sewer, such as rain gutters and other hard piped connections conveying storm water into the sewer. Such connections increase the flows in the sewer during rain events and may cause sewer overflows that can pollute creeks and the ocean; and
- Closed circuit television video of sewer lines is utilized to assess the condition of the sewer collection system pipes. The District prioritizes the problem areas to take appropriate actions such as removing root balls, grease and oil buildup, and rehabilitating or replacing deteriorated pipes.

The District has contracted for an Infiltration and Inflow Investigation of the sewer system that drains to the District's largest sewer lift station. This lift station receives increased flow during rain events from an unknown source.

The Fat, Grease and Oil Program provides outreach to all of the restaurants and institutional kitchens within the District including training of the kitchen staff in the proper procedures for disposing of food waste, grease and oil. District staff tracks the facility's grease interceptors and grease traps pumping schedule as well as conducts routine inspections of the cleaning operations. Additionally, random sampling and testing of the interceptors/traps discharge are performed to ensure that it falls below the required limit of 100 mg/l.

A GIS is currently being developed by the District. The automated map will be linked to a computerized databases containing information pertinent to the collection system. The GIS will contain data on the location, age, size and material type of the pipelines within the District. The information will also be used to create preventative maintenance programs to reduce spills and breaks.

Employee education is conducted regularly through in-house training, association conferences, and training seminars. Public outreach programs include community and school involvement, and plant tours that are tailored to meet the needs and interests of all age groups.

Summerland Sanitary District

The Summerland Sanitary District was established in 1957 to meet the sewage treatment needs of the surrounding population. Currently the District is comprised of 20 miles of sewer line which carries 2.4 million gallons of wastewater for treatment at the District facility. The District includes residences and 10 businesses, but no industries in its service area.

A grease trap monitoring program has been put in place to help area businesses avoid problems with grease that is generated in those businesses. This proactive measure helps the District maintain the lines free of clogs and backups caused by grease buildup in the system, thus helping to eliminate surface pollution. A Source Control Program is also utilized by the District to help promote approved sewerage disposal. These programs also assist the District in minimizing plant upsets and "down" time caused by impairment of the waste digestion process

Additionally the District uses liquid smoke flushed into the system lines to detect broken lines and potential illegal cross connections and illicit hookups. A video camera is used within the system lines to also detect and locate line breaks, line blockages and areas where the line may need to be replaced. The District responds to complaints and will place a composite sampler at a site that is implicated. This sampler enables the District to assess the wastewater composition and determine if there is an illicit discharge coming from the location. If an illicit discharge is discovered, the District takes action to immediately halt the violation.

The Summerland Sanitary District provides educational opportunities to its customers to learn how the plant and system works and why it is necessary for every individual to do their part in promoting the safe and efficient operation of the sewer system. These educational outreaches include visits to the local schools to invite involvement of the students in learning about the plant and how sewage is managed for them. Tours of the plant are also offered to heighten the experience for the students and the public.

Training is a part of the ongoing maintenance of the District. District staff is trained to respond immediately to emergencies in a safe and effective manner. This minimizes any adverse affect that an accident may have on the environment and safeguards the health of the public in the vicinity.

Vandenberg Village Community Services District

The District started operation of its wastewater collection activities in December 1988. It operates 23 miles of wastewater collection system, covering over 6 square miles, with four pumping lift stations. The Village's annual discharge of approximately 180 million gallons of wastewater is treated at the City of Lompoc's Regional Reclamation Plant and includes wastewater collection for residences, 40 businesses and no industrial facilities.

The District has ordinances to cover programs such as cross-connection control and backflow prevention, commercial and restaurant grease and toxic substance control, system maintenance, (i.e. methods of detection of line failure), preventative maintenance activities, and annual line replacement rate schedules.

The District conducts an on-going scheduled maintenance and inspection program for sewer collectors, manholes, and lift stations. Their preventative maintenance program is supported by scheduled sewer line cleaning with a high pressure jetter, video camera inspections on a recurring basis, and repairs as needed when identified by inspection. The "Inflow and Infiltration Report" is annually reviewed and updated. Past reports conclude that the collection system and lift stations are in excellent condition. Only one line in the last ten years was identified as failing and it was replaced with a new line in 1996. One line with root infestation was identified in 2001 to be replaced and it is scheduled for replacement in 2003.

An up-to-date sewage spill and response plan that provides procedures for containment, treatment, cleanup, disposal, disinfection, and notification of agencies and the public, and safety procedures for District personnel is utilized. Also, the District implements a "Commercial and Restaurant Grease and Toxic Substance Control Program" which provides for quarterly inspection and reporting of commercial establishments' compliance with District Ordinances. Educational outreach to individual commercial facilities is conducted during each quarterly inspection.

The District area is overseen by service personnel on a daily basis. They are alert to any unusual activities that may affect the wastewater collection or wastewater operations of the District. Inspections are made daily at all pump stations, and collectors, and manholes are inspected on a scheduled basis. Effluent quality and constituents are monitored by the regional treatment plant daily, and are reported to the District monthly. The District invested in prevention by providing lockable man-hole covers to prevent vandalism at locations susceptible to vandals. This has prevented blockages and overflows from these areas. Additionally, the District initiated a project that raised manhole elevations in areas susceptible to storm flows in order to prevent inflows or spills from storm water mixing with wastewater. The District's sewer facilities are maintained in top condition so that accidental spills/overflows do not occur.

Employee education and public outreach materials are used to encourage participation by the community in safe wastewater disposal, which helps to eliminate illicit discharges. Onsite and operational BMPs to protect surface water quality are also being utilized by the District. These include equipment maintenance protocols, cover materials, containment of waste to eliminate site surface runoff and review of operations to improve site storm water management where possible.

3.3 Measurable Goals

The following measurable goals for BMPs have been selected to ensure that illicit discharges are detected, eliminated and prevented:

BMP: Storm Sewer Mapping

- Completed insofar as meeting minimum requirements of showing the location of all outfalls and the names and locations of all waters of the U.S. that receive discharges from those outfalls.
- Provide ongoing database maintenance and revise as new information becomes available or mistakes are identified. List revisions made in each annual report.
- Make PDF files available on Project Clean Water website by year 1.

BMP: Storm Water Ordinance

- Adopt and enforce storm water ordinance (year 1).
- 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).

BMP: Education & Outreach

- Document number of brochures and alternative information sources distributed, website hits, and number of people attending public events (see Section 1.0).
- Reach 15% of permit area annually (see Section 1.0).
- Document number of graduates from Green Gardener Certification Program (see Section 1.0).
- Document number of commercial/business/industrial training workshops and number of attendees.
- Provide Mutt Mitts for proper pet waste disposal.
- 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 (See Section 6.2.7 Solid Waste Handling and Recycling) (years 1-5).

BMP: Spill & Complaint Response

- Respond to 100% of complaints of illicit/illegal discharge within 24 business hours of receiving the complaint, referral or notice.
- Document response to complaints, notices and referrals received.
- 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.

- 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.

BMP: Commercial/Industrial Facility Inspections

- The Fire Department is responsible for inspecting sites and monitoring their compliance with hazardous materials best management storage practices and spill response. Fire Department shall continue to inspect and monitor all regulated commercial and industrial facilities that use, store, or generate hazardous materials/wastes. Reporting, recordkeeping, and referrals shall continue as directed under the current regulatory programs with designated state and local agencies.
- 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. Reporting, record-keeping, and complaint response will continue under the current regulatory programs.

BMP: Illicit Discharge Field Investigation & Abatement

- Inspect targeted creeks within the County permit area twice annually with follow-up inspections as appropriate to ensure abatement of violations.
- Ensure conversion of failing septic systems to sewer when the system is within 200 feet of an approved sewer system, as determined by EHS.
- Take action to abate deficiencies that are identified on septic system pumper reports.
- Eliminate 100% of all other illicit discharges reported to or discovered by County staff.
- Establish and implement program to address potentially polluting businesses and operations that are not regulated or not otherwise inspected on a routine basis (i.e., food service inspections). Measurable goals will include annual routine inspection of 50% of the prioritized businesses and operations that may be sources of illicit discharges. Develop program by Year 1 and implement Year 2.
- 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.

3.4 Reporting

The data collected for each BMP will be compiled, reviewed and reported in annual reports. Significant variance from targets will be assessed and discussed in annual reports. Measurable goals will be adjusted as appropriate; the basis for any changes will be included in the next annual report. Feedback from stakeholders and other sources will be used to improve implementation of all six minimum control measures.

**Table 3-4
BMP Implementation: Illicit Discharge Detection and Elimination**

Year	BMP/(POC)	Current Status	Implementation Details	Measurable Goal	Implementing Entity
1-5	Storm Sewer Mapping (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Sedimentation/Siltation; Fecal coliform; Total coliform; Heavy metals)	Minimum requirements of storm sewer system have been mapped and surveyed by County Water Resources Division.	Utilize maps to track sources of illicit discharges.	<ul style="list-style-type: none"> • Provide ongoing database maintenance and list all revisions in annual report. (years 1-5) • Make PDF files available by year 1 	County Public Works
1-2	Storm Water Ordinance (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Sedimentation/Siltation; Fecal coliform; Total coliform; Heavy metals)	Draft ordinance in circulation.	Comments or suggestions on draft ordinance will be reviewed by Project Clean Water staff.	<ul style="list-style-type: none"> • Adopt and enforce ordinance by the end of year 1. • 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). 	County Public Works
2-5	Storm Water Ordinance (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Sedimentation/Siltation; Fecal coliform; Total coliform; Heavy metals)	Draft ordinance in circulation	Annual report will include enforcement activities and follow-up abatement results of all County agencies, including follow-up on referrals to other agencies or entities. Where inadequacies are identified, recommendations will be made with a schedule for implementation.	<ul style="list-style-type: none"> • Evaluate effectiveness annually (years 2-5). • Recommend improvements and rectify inadequacies as appropriate (years 2-5) 	County Public Works

County of Santa Barbara
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Year	BMP/(POC)	Current Status	Implementation Details	Measurable Goal	Implementing Entity
1 - 5	E ducation & Outreach (see Section 1.0 Public Outreach & Education) (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Sedimentation/Siltation; Fecal coliform; Total coliform; Heavy metals)	Brochures and posters are available in Spanish and English, and web site is established. Mutt mitt program in effect at County Parks and other open spaces. Recycling and collection program in effect.	Brochures provide info on how community members can prevent storm water pollution. Other outreach includes misc. alternative info sources, website, and public events.	<ul style="list-style-type: none"> • Compile number of brochures and alternative information sources distributed, website hits, number of people attending public events (years 1-5). • Reach 15% of permit area annually (years 1-5). • 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). 	County Public Works; Parks
1 - 5	Green Gardener Certification Program (see Section 1.0 Public Outreach & Education) (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Sedimentation/Siltation; Fecal coliform; Total coliform; Heavy metals)	Over 500 gardeners trained to date, annual training in Spanish and English.	Continuation of program is contingent upon grant funding.	<ul style="list-style-type: none"> • Train 100 gardeners annually. • Complete pilot water quality study • Obtain 25 customer surveys annually. • Seek additional grant funding. • Document number of graduates from Green Gardener Certification Program (years 1-5). 	County Public Works/ program partners
1 - 5	Business Outreach (see Section 1.0 Public Outreach & Education) (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Sedimentation/Siltation; Fecal coliform; Total coliform; Heavy metals)	Program focuses on restaurants, automotive services, mobile cleaners, and construction trades.	Written materials and posters are distributed to businesses, during complaint response, and at events. A Restaurant Recognition Award is presented quarterly.	<ul style="list-style-type: none"> • Compile number of materials distributed annually. • Document number of commercial/business/industrial training workshops and number of attendees (years 1-5). 	County Public Works
1 - 5	Mutt Mitts (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Fecal coliform; Total coliform; Heavy metals)	The Parks and Public Works Depts. Provide mutt mitts at County parks and open spaces.	Continue to provide mutt mitts at County parks and open spaces.	<ul style="list-style-type: none"> • Continue distribution of mutt mitts (years 1-5). • Document number of mutt mitts distributed annually at County parks and open spaces (years 1-5). 	County Parks and Public Works

County of Santa Barbara
Storm Water Management Program July 2006

Year	BMP/(POC)	Current Status	Implementation Details	Measurable Goal	Implementing Entity
1 - 5	Spill & Complaint Response (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Fecal coliform; Total coliform; Heavy metals)	Ongoing	Respond to complaints received through the water quality hotline, observations, and reports from field personnel.	<ul style="list-style-type: none"> • Respond to complaints of illicit/illegal discharge within 24 business hours of receiving the complaint, referral or notice. • Document response to complaints, notices and referrals received. • 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. • Review complaint response protocols on annual basis to assure that abatement and enforcement measures are being implemented. If shortcomings are identified, recommendations for improved protocols will be made. 	County Public Health and Public Works

County of Santa Barbara
Storm Water Management Program July 2006

Year	BMP/(POC)	Current Status	Implementation Details	Measurable Goal	Implementing Entity
1-5 (ongoing)	Commercial/ Industrial Facility Inspections	The Fire Department inspects and monitors regulated facilities for best management storage practices and spill response. County EHS performs routine inspections at all food facilities.	Fire Department shall continue to inspect and monitor all regulated commercial and industrial facilities that use, store, or generate hazardous materials/wastes. County EHS shall continue food inspection program that includes proper disposal of commercial wastes.	<ul style="list-style-type: none"> Reporting, recordkeeping, and referrals shall continue as directed under the current regulatory programs with designated state & local agencies. 	County Fire Department
1 - 5	Illicit Discharge Field investigation & Abatement (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Sedimentation/Siltation; Fecal coliform; Total coliform; Heavy metals)	Ongoing	Perform field investigations to identify and abate water quality problems.	<ul style="list-style-type: none"> Inspect creeks twice annually to identify illicit discharges. Ensure conversion of failing septic systems under EHS criteria. Address deficiencies identified in septic system pumper reports. Eliminate 100% of all other illicit discharges reported to or discovered by County staff. 	County Public Health and Public Works
1-5	Illicit Discharge Field Investigation & Abatement (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Sedimentation/Siltation; Fecal coliform; Total coliform; Heavy metals)	Not implemented	Develop and implement program addressing potentially polluting businesses and operations not otherwise regulated or inspected on routine basis. Develop program by Year 1; implement Year 2	<ul style="list-style-type: none"> Develop program (Year 1) Establish measurable goals for implementation. Measurable goals will include annual routine inspection of 50% of the prioritized businesses and operations that may be sources of illicit discharges. (year 1) Implement program (Year 2) 	County Project Clean Water staff
2-5	Illicit Discharge Field Investigation & Abatement (Pathogens; Nutrients; Organic Enrichment/Low DO; Priority Organics; Sedimentation/Siltation; Fecal coliform; Total coliform; Heavy metals)	Not implemented	Establish program to prevent recurring illicit discharges. Develop program by Year 2; implement Year 3.	<ul style="list-style-type: none"> Develop program (Year 2) Establish measurable goals for implementation (Year 2) Implement program (Year 3) 	County Project Clean Water staff