

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. No revisions or additions were made during Year 7.

Proposed Modifications: None.

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

Status: No changes were made to the storm drain maps in Year 7.

Proposed Modifications: None

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

BMP 3.2 Storm Water Ordinance

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

Status: The Board approved the ordinance on September 25th 2007. See discussion in Year 2 Annual Report. 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 are used as appropriate.

Proposed Modifications: None.

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 (Chapter 29 Article IV) prohibits the discharge of pollutants into the storm drain system and authorizes the Public Works Department to enter

a facility that shows evidence of a possible illicit discharge to the storm drain system. Enforcement includes fines and administrative penalties.

As described in the Storm Water Management Program, the approach for addressing illicit discharges is first to educate the responsible party. It is critical to explain that polluted discharges are prohibited because of their impacts to water quality. Most people don't recognize the connection. Communication is most effective through face-to-face contact which may or may not be supported by or followed-up with a letter.

In Year 7, there were 39 cases of potential discharges reported to or discovered by Project Clean Water staff. See Measurable Goal 3.4.2 for a discussion of all complaints and discoveries. All cases were investigated, and 10 received written notification concerning violations or potential violations of prohibited discharges requiring clean-up and abatement. Those needing correction were abated in a timely manner. In one of the four ongoing cases, the CCRWQB is involved and will likely be issuing fines to the discharger. In another case, the County is looking into proper disposal practices for wash water from County Fire Department vehicles. The remaining two ongoing cases involve alterations that were done to riparian zones and are being pursued by Planning and Development. All written or verbal correspondence associated with a case is retained as a communication record.

The current content and use of the ordinance has allowed PCW staff to enter private property, investigate potential pollution sources, issue notices of violation if necessary and ensure that discharges are abated in a timely manner. Should a responsible party continue to employ practices that could result in a threat to water quality or if a responsible party fails to abate a discharge that is or may result in a threat to water quality, there are tools available for enforcement including administrative fines. Our current ordinance is effective in that it provides the appropriate legal authority necessary to stop unauthorized discharges and to enforce storm water requirements.

Proposed Modifications: None

BMP 3.3 Education & Outreach

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

Status: County Parks distributes dog waste bags to select County parks and open spaces in the County unincorporated areas with support from local non-profits, commercial sponsors, and residents. In Year 7, an average of 29,625 bags per month or a total of 355,500 bags were dispensed by the Parks Department on the south coast with an additional unknown quantity provided by commercial sponsors and volunteers (Goleta Beach, Arroyo Burro Beach, Rincon) as well as individuals placing used plastic bags in existing mutt mitt

holders. Project Clean Water placed 74,400 dog waste bags at nine stations along the Atascadero bike trail. Although Parks Department in North County discontinued dispensing mutt mitts, station holders are refilled by residents with used plastic bags.

For this permit year, the County distributed a total of 429,900 dog waste bags.

Proposed Modifications: None

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).*

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 mission is: “To protect the public health and environment of our community by efficiently managing waste products and utilities with a focus on resource conservation.”

The Resource Recovery and Waste Management Division provides outreach and media campaigns to a wide range of targeted communities. The following table summarizes amounts of solid and hazardous materials that were removed from the waste stream, thereby minimizing illegal dumping.

**Table 3-1
Amount Waste Collected Recycled**

Amount Collected	Waste Stream
Used Oil Collection	
12,622 gal oil	Certified Collection Centers (and 951 filters)
5,475 gal oil	Community Hazardous Waste Collection Centers (300 filters)
1,250 gal oil	Santa Ynez Valley ABOP (0 filters)
1,490 gal oil	Goleta ABOP operated by MarBorg (and 470 filters)
589 gal oil	Hazardous waste collection events, Santa Ynez and New Cuyama (and 39 filters)
<u>4,171 gal oil</u>	<u>Other (and 675 filters)</u>
25,597 gallons oil	Total Oil (and 2,435 oil filters)
Electronics	
691,542 lbs	EWaste County Transfer Station
55,225 lbs	<u>EWaste events (Cuyama and Santa Ynez)</u>
746,767 pounds	Total electronics
Other Household Hazardous Waste	

Amount Collected Waste Stream

570,119 lbs	Community Hazardous Waste Collection Center (UCSB)
<u>55,225 lbs</u>	<u>Hazardous Waste events (Cuyama and Santa Ynez)</u>
625,344 pounds	Total household hazardous waste collected

In addition, the following volunteer cleanup efforts removed additional trash from the creeks and ocean:

**Table 3-2
Volunteer Clean Ups**

Amount Collected	Participants	Creek or Beach	Event or Date
2,592 lbs	847	23 Beach & Creek sites County wide	Coastal Cleanup Day, September
150 lbs	25	2 local Creeks	Creek Week, fall
40 lbs	10	Atascadero Creek	July, 2012
50 lbs	10	Devereux Creek	July, 2012
50 lbs	5	Arroyo Burro Creek/Beach	July, 2012
150 lbs	10	Isla Vista Beach	July, 2012
300 lbs	216	Arroyo Burro Beach	WRC; 11 Sundays

Isla Vista Student Move-Out: June 13-June 29 2012

In spring 2013, the Resource Recovery and Waste Management Division helped coordinate the waste removal in Isla Vista, the community adjacent to the University of California Santa Barbara. Each year UCSB students leaving for the summer break produce huge volumes of trash that must be continuously removed throughout the two week period to prevent arson, vandalism, and contamination of the storm drains. This year a total of 502 tons of material was removed from the streets of Isla Vista. Last year during this same period of time 535 tons were removed.

Backyard Composting. County provides information brochures and offers greatly discounted composting bins at cost (\$40) year round at the South Coast Recycling & Transfer Station and in the North County at the North County Public Works Building on Foster Road.

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

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 and Household Hazardous Waste. See Table 3-1 for amounts of electronic wastes recycled or collected in Year 7. Brochures were distributed at all public events and at the County Hazardous Waste Center.

The following brochures of each type were distributed in Year 7:

- E-Waste: 700
- Pharmaceuticals (Operation Medicine Cabinet): 2,000
- Sharps: 1,000
- Hazardous Waste (Collection Flyers, Bilingual): 27,000
- Hazardous Waste (Residential, Bilingual): 2,000
- Hazardous Waste (Business, Bilingual): 150

The following household hazardous waste / E-Waste collection events were held in Year 7:

- October, 2012 at the New Cuyama Recycling and Transfer Station
- April, 2013 at the Transfer Station

The following media campaigns were implemented in Year 7:

HHW Collection Events – For both of the Santa Ynez events, we included newspaper inserts (flyers) in the Santa Ynez Valley News and ran ads in the Santa Ynez Valley Journal. We also ran radio ads on KSYV (Mix 96). For the Cuyama Valley event, we mailed flyers directly to residents in Cuyama and included an article in the local recreation newsletter.

Oil Recycling – In June 2013, we ran newspaper ads in the Noozhawk, Independent (online and in print), and Santa Ynez Valley News; radio ads on English-language stations KTYD, KSBL, KVYB, KRTO, KRAZ, KSYV, KSNI, KXFM, and KDB and Spanish-language stations KIST, KIDI, KTAP, and KSMY; and TV ads on Spanish-language station Univision.

Electronics Recycling – In April 2013, we ran newspaper ads in the Independent (online and in print), Noozhawk, and Santa Ynez Valley News. Radio ads on KRAZ, KSYV, KDB, KIST, KTYD, and KSBL.

Green Award Program. In Year 7, the County participated in the fifth year of a County-wide Green Business Program; www.greenbizsb.org 30 County cities, utilities, agencies, districts and non-profits are funding the program in four business sectors (Hotels, Restaurants, Automotive, and Office and Retail). 22 businesses were certified in the fifth year of the program and recognized at an awards ceremony in February. County Water Resources and Resource Recovery Waste Management Division staff continue to serve on the Steering Committee. PCW has been a part of the check list development and updates in order to ensure that meeting storm water pollution prevention requirements is a criterion for green business certification. In addition, PCW and pollution prevention information is included on the website's Resources page.

A 3 year recertification cycle was voted on by the Green Business Program partners. Additionally, the Policy & Procedure document allows for revocation of certification for serious violation of environmental regulations and failure to maintain Green Business standards.

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 at curbside rather than throw it into their trash containers or otherwise discard into the environment. 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.

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 the 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.

Number of brochures distributed: Home-Generated Sharps (Bilingual) – 1,000.

Operation Medicine Cabinet. In Year 4, Resource Recovery established Operation Medicine Cabinet, which allows residents to bring all types of unwanted medications, including prescription and over-the-counter drugs, to free drop-off locations countywide.

Drop boxes are located at each of the Sheriff’s nine substations, providing a safe, convenient way to dispose of household medications.

Proposed Modifications: None.

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.

Proposed Modifications: None

Future Plans: A 24 business-hour response to all complaints will continue.

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

Status: The County’s Project Clean Water program received and recorded 39 complaints or discoveries for this permit year.

The following table breaks down cases by responsible party:

**Table 3-3
Complaints & Discoveries Summary Table**

Responsible	# Cases
Business	10
Residence	8
Contractor	5
County (Roads, Fire)	2
Property Manager	4
Homeless	2
Agriculture	3
Unknown / Undetermined	1

Responsible	# Cases
No Water Quality Concern	4

Total 39

There were 4 reported cases with no evidence of discharge affecting water quality (not observed or was misreported).

Of the remaining 35 cases, there were six cases where the discharge or problem had already occurred and abatement was no longer possible. In each of these cases, County staff discussed the water quality implications of their actions with the responsible party. In three cases, County staff observed an illegal discharge, but was unable to locate a source. This remains an ongoing case; however toxicity tests indicate no threat to aquatic organisms.

Four other cases are currently listed as “ongoing” where the source of the complaint is known and compliance underway.

Three cases were forwarded to the City of Goleta. One case was forwarded to the City of Santa Barbara.

The remaining seventeen cases resulted in correction or abatement. These cases are summarized in Table 3-4.

**Table 3-4
Abatement Cases**

2012-016	Illegal blackwater dumping from recreational vehicles in Isla Vista. Signs
2012-017	Contractor washing silt from saw-cutting of stones into catch basin. Told to discontinue practice and sweep up material.
2012-018	Concrete hauler washing out chutes into street. Told to utilize onsite spoils pit.
2012-019	Exhibitors at dog show washing animals and allowing runoff into storm drain. Parking Chairman rendered offending hose bib inoperable and promised to have plan in place for next year.
2012-021	Carpet-cleaning process water allowed to flow into gutter. Had contractor direct flow to planter and instructed owner to repair leaking tanks.
2012-022	Restaurant had installed illegally-plumbed mat-washing station to creek. Business owner made to submit application for properly-designed system.
2012-023	Black water observed flowing out onto beach. Tracked source to overwatering. Hotel asked to reduce watering and clean beach on daily basis should this occur in future.
2012-026	Toilet paper and feces found in creek, as well as potentially hazardous materials stored on the bank. Business owner instructed to remove and cleanup all potential sources of pollution.
2012-028	County Roads crew allowing sediment from saw-cutting to wash into gutter. Although very minute amounts found, Roads used street sweeper to clean up material.
2012-029	Pump from sediment basin discharging into creek. Had pump removed from operation.
2013-005	Washing machine discharging to creek. EHS required connection be plumbed to sanitary sewer.
2013-010	Carpet cleaning van dripping into gutter. Made business owner move van to pervious area on property and suggested repairs.
2013-017	Gardner blowing debris into storm drain and over cliff. Discussed problem with property management company. Subsequently verified that practice has been discontinued.
2013-019	Cleaning agent dumped down drain connected to downspout. Property manager said this practice will be terminated.
2013-020	Water and sediment from power washing flowing into gutter and storm drain. Made contractor sweep up mess. Will work with property management company next year in advance of Isla Vista moveout weekend.
2013-021	Water and sediment from power washing flowing into gutter and storm drain. Made contractor sweep up mess. Will work with property management company next year in advance of Isla Vista moveout weekend.
2013-023	Water and sediment from power washing flowing into gutter, but not storm drain. Made contractor sweep up mess. No further problems observed.

MCM 3.0 Illicit Discharge Detection & Elimination

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2013-023	Water and sediment from power washing flowing into gutter, but not storm drain. Made contractor sweep up mess. No further problems observed.

Proposed Modifications: None

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: PCW responded to 100% of calls within 24 hours. Complaints outside direct County authority are forwarded to appropriate regulatory agency within 24 hours. Where those complaints were forwarded, staff confirmed receipt of the complaint and course of action by the agency within 24 hours.

Proposed Modifications: None

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 regularly by PCW staff. Experiences from prior follow-ups are used in current complaints to help in communication or abatement. The current approach has proven effective for the past several years; no changes were made this permit year.

Proposed Modifications: None

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.

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) include notations highlighting the following code requirements:

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

Facilities that are subject to any CUPA program are inspected either annually or triennially. Those that are found to be out of compliance in a manner that could threaten the waters of the State, are required to return to compliance within 30 days or less depending on the severity of the issue and possible consequences. Other compliance issues such as paperwork deficiencies are dealt with as quickly as possible.

Proposed Modifications: None

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.*

Status: The County Public Health Department’s Registered Environmental Health 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. Results of these inspection programs indicate that 100 % of permanent food facilities requiring inspections received those inspections in Year 7.

Proposed Modifications: None

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 businesses within the County's SWMP permit area, and that are not otherwise inspected by Environmental Health (food service facilities) or County Fire (hazardous waste generators). The Business Inspection Program is discussed in detail in the Annual Reports for Years 1 and 2.

In Year 7, the County included additional businesses that store any quantity of waste and used tires. These include generators, end use facilities, and haulers. Recent state legislation created a regulatory program to ensure the proper storage of waste tires and establish a separate inspection program directed toward public health. Permits and manifests are required by the state, but local agencies (in this case the County of Santa Barbara) perform the inspections.

Therefore, tire storage businesses were added to the master business list from Year 5. Of the 120 businesses listed, 104 were inspected in previous years, leaving 16 businesses to inspect in Year 6. With the addition of 66 tire storage businesses, the master list for Year 6 included 82 total businesses (16 + 66 = 82). In Year 6, 47 of the 82 businesses were inspected. In year 7, an additional 30 businesses were inspected.

There were no businesses that were causing an active discharge of pollution into the storm drain system; there were no violations of County code.

Proposed Modifications: None

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 7, there was no enforcement activity required as a result of the PCW business inspections. All potential discharges needing correction were abated in a timely manner.

Proposed Modifications: None

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 PCW staff and Flood Control staff during the year. Inspectors are looking for trash and other pollutants or human activities that could significantly impact water quality, such as homeless encampments, green waste dumping, and excessive animal waste. The following table documents the dates and discoveries, if found, during creek walks in Year 7.

**Table 3-6
Creeks Walked Year 7**

Stream	*Date Walked	Discoveries	Comments
Alamo Pintado	11/1/12pcw, 3/26/13fc	None	
Arroyo Paredon	11/2/12pcw, 3/13/13fc	None	
Atascadero	9/13/12pcw, 3/27/13fc	None	
Buena Vista	1/11/13pcw, 4/2/13fc	None	
Carpinteria	9/20/12pcw, 3/13/13fc	None	
Cieneguitas	12/14/12pcw, 3/25/13fc	None	
Devereux	5/4/12pcw, 9/21/11pcw	None	
Garapata	5/10/12pcw, 10/21/11pcw	Trash	Cleaned by staff
Hot Springs	12/20/12pcw, 4/2/13fc	None	
Hospital	12/20/12pcw, 3/25/13fc	None	
Las Palmas	9/13/12pcw, 3/20/13pcw	None	
Las Vegas	12/21/12pcw, 4/4/13fc	None	
Maria Ygnacio	12/14/12pcw, 3/28/13fc	None	
Montecito	11/9/12pcw, 3/18/13fc	None	
Oak	10/11/12pcw, 4/2/13fc	None	
Orcutt /Orcutt	11/1/12 pcw, 3/12/13fc	Trash	Cleaned by staff
Solmon			
Picay	10/11/12pcw, 3/18/13pcw	None	
Romero	10/11/12pcw, 4/1/13fc	None	
San Antonio	12/21/12pcw, 3/20/13fc	None	
South Coast			
San Antonio	11/1/12pcw, 3/19/13fc	None	
Los Alamos			
San Jose	12/20/12pcw, 4/4/13fc	None	
San Pedro	12/21/12pcw, 4/4/13fc	None	
San Ysidro	2/7/13pcw, 3/27/13fc	None	
Santa Monica	9/20/12pcw, 4/1/13pcw	None	
Tecolote	1/24/13pcw, 3/11/13fc	None	
Toro Canyon	11/9/12pcw, 4/2/13fc	None	
Zanja De Cote	11/1/12pcw, 3/19/13fc	None	

* (fc = Flood Control staff; pcw = Project Clean Water staff)

Proposed Modifications: None

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 systems where a sanitary trunk line is within 200 feet, following Chapter 7 of the California Plumbing Code requirements.

In Year 7, no parcels were required to connect to sewer.

Proposed Modifications: None

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 7, no septic systems were in failure resulting in surfacing liquid waste.

Proposed Modifications: None

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 PCW staff were documented as complaints or discoveries and addressed within 24 hrs. Follow-up field investigations eliminated all illicit discharges.

There were 33 complaints received at Environmental Health Services in Year 7 (see MG 3.4.2 for complaints received by Project Clean Water). All 33 were abated, with no cases ongoing. Of these, 31 were sewage related complaints and 2 were non-sewage. This ratio is higher for sewage-related complaints because non-sewage complaints are typically forwarded to Project Clean Water for response and follow-up.

Proposed Modifications: None

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: There was one case where a repeat violation occurred. The CCRWQCB is currently pursuing enforcement action against the responsible business.

Proposed Modifications: None

3.6.6 Measurable Goal: *Evaluate effectiveness of abatement program 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: One recurrent discharge was found in Year 7. The CCRWQCB is currently pursuing enforcement action against the responsible business. As discussed under MG 3.2.2, 10 written notifications were sent concerning violations or potential violations of prohibited discharges requiring clean-up and abatement, and those needing correction were abated in a timely manner. Warning Notices or Correction Letters are appropriate where a change in practice or cleanup is warranted, but where a discharge is not actively occurring. A Notice of Violation would be issued where an active discharge is occurring or has occurred without immediate response to abate the discharge. At this time, no inadequacies in the program to prevent recurrence of illicit discharges are identified; therefore there are no recommendations for improvement.

Proposed Modifications: None