

Exhibit A-9.III

- Industrial/Commercial Inspection Procedures
- County Industrial/Commercial Inspection Form



INSPECTION PROCEDURES

This attachment provides the County with a stepwise process for conducting industrial/commercial inspections.

1.0 PRE-INSPECTION PREPARATION

STEP 1: Establish purpose

The inspector needs to establish the purpose and scope of the inspection and to review all pertinent background information. For an advisory inspection, the inspector must contact the industry officials to schedule the inspection. The inspector may also request that relevant documents be available for on-site review (e.g., SWPPP, site plans, spill response plan, etc).

STEP 2: File review

The inspector should review any existing Permittee files or information for the industry, which may include past complaints, permits, monitoring data or submitted SWPPPs as it pertains to compliance with the County's Water Quality Ordinance.

STEP 3: Database review

The inspector should also review the inventory database to identify the SIC code (for industrial facilities) and determine what type of industrial activity and pollutants may be expected. The inventory database will indicate if the facility has or should have filed a Notice of Intent (NOI) to operate under the statewide General Industrial Permit. The database will also identify the hydrologic unit and proximity to Clean Water Act (CWA) 303(d) water bodies, environmentally sensitive areas (ESAs) or areas of special biological significance. This information should be compared against the current information available in the inventory database in order to verify its accuracy.

2.0 APPROACHING THE SITE

STEP 1: Observations

Before entering the facility grounds, the inspector should make note of the following:

- Nearby conveyances or water bodies;
- Visible discharge points along the perimeter of the site;
- Outdoor areas of intensive industrial activity; and
- Signs of recent additions or remodeling.

3.0 FACILITY INSPECTION

STEP 1: Entry

The inspector must present proper credentials and request to meet with the appropriate industry officials to discuss the inspection scope and objectives. If the inspector is denied entry into the facility, the inspector must withdraw from the premises and contact the appropriate legal authority to determine if court action should be sought to obtain entry.

STEP 2: Opening conference

After authorized entry, the inspector will discuss the inspection scope and objectives. The inspector should attempt to verify and update the Permittee's inventory information, such as:

- Changes in ownership or operations
- Clarification of observations noted before entering the facility, (any changes in activities, materials, or physical structures should be reflected in the SWPPP)
- Review of the SWPPP as it pertains to the County's Water Quality Ordinance, which may include these elements:
 - Site map;
 - List of industrial activities, types of pollutants, and existing non-structural and structural BMPs to reduce these pollutants in storm water discharge;
 - Pollution prevention methods;
 - Description of type and location of non-storm water discharges, both authorized and unauthorized; and
 - Inventory of materials, including storage and loading/unloading areas.
- Review of any existing storm water monitoring data.

STEP 3: Outdoor walk-through

The inspector and responsible industry official(s) should walk through all outdoor areas and observe activities, wherever it is safe to do so. Typical areas of activity that might impact storm water quality include are outlined in the BMP fact sheets included in **Attachment C**.

The inspector should attempt to gain a clear understanding of how runoff leaves the facility site by observing all portions of the storm water conveyance system and site grading, where possible and safe. This includes inlets, outlets, open channel conveyances such as ditches, etc.

The inspector must document the observed conditions, including any BMPs being implemented, and must assess the facility's impact on storm water quality from the outdoor activities. Impact includes the facility's *potential* to discharge and the facility's *actual* discharge, which are further described below.

STEP 4: Indoor walk-through

Review indoor activities and areas to ensure that pollutants are not spilled, dumped, or allowed to flow outdoors. The inspector must document the observed conditions, including any BMPs being implemented, and will assess the facility's impact on storm water quality from the indoor activities.

STEP 5: Assess impact on storm water quality

The inspector should attempt to determine the facility's impact on storm water quality at two levels: the facility's potential to/for discharge and the facility's actual discharge. The difference between potential and actual is determined by whether BMPs are effectively applied. For example, a facility that stores all of its machinery and heavy equipment outdoors or performs certain activities outdoors has a high potential to impact storm water runoff. However, if equipment is well maintained and covered when not in use, the level of pollutant exposure should be minimized and the actual impact of the facility upon storm water runoff quality is greatly reduced. The inspector should note three things on the inspection report:

- 1) What is the facility's potential to impact storm water quality and non-storm water discharges from exposure to on-site pollutants? Identify areas or activities that require BMPs to be applied to reduce or eliminate potential pollutant discharges to storm drains. If BMPs are in place, determine what the impact would be if BMPs failed or were no longer applied.
- 2) Are BMPs effectively applied so that exposure to pollutants is minimized and non-storm water discharges are eliminated? For each of the facility's areas of activity, observe whether BMPs are in place and effective. The inspector may encounter situations where BMPs are in place but are not effectively applied. The inspector will use their best professional judgment on the imminent impact of the facility and decide how much time to allow the owner/operator to correct the problem.
- 3) What types of impact does the facility have on storm water quality? Clearly describe on the inspection report whether the impact is from: 1) pollutant exposure to runoff; and/or 2) non-storm water intentionally or accidentally discharged to storm drains.

STEP 6: Document inspection activities

As the inspector observes the outdoor and indoor activities at the facility, they should also take notes and photos as appropriate. The inspector should document the locations and types of BMPs that are currently being implemented and assess areas where BMPs should be implemented in the future. The inspector may also collect samples of illicit discharges or storm water from the facility as appropriate.

An inspection form has been provided for the Permittee's use in documenting the above information during a site inspection. Use of this form is suggested for all Permittees to maintain consistency in inspection efforts; however, the form may need to be modified to address specific Permittee needs.

STEP 7: Closing Conference

After the walk-through of the facility, the inspector should collect any missing or additional information, including verifying the SIC codes. The inspector may review other documentation to look for indications of discharge problems, such as monitoring data, the Hazardous Materials Release Response Plan and Inventory, permits, manifests, logs and other records required of the facility by local, state or federal laws in order to conduct operations or business on the premises. The inspector should review the inspection findings and inform the facility officials of follow-up procedures.

The Permittee may also provide educational materials, applicable BMP fact sheets, and any other technical and regulatory information to assist facilities in attaining compliance.

STEP 8: RECORD KEEPING

The inspector will update the inventory and complete the inspection report upon return to the office. The inspection report should contain at least the following sections:

- General information to update the inventory;
- Review of relevant facility-provided information;
- Assessment of BMP implementation;
- Documentation of violations and time frame for correction; and
- Signature and confirmation.

Follow-up inspections will be done as needed to confirm BMP implementation and compliance.



County of Orange, OC Public Works
 Stormwater Program
 2301 N. Glassell St., Orange, CA 92865
 (714) 955-0600 Fax (714) 955-0639

Industrial/Commercial Inspection Form

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Inspector Name: _____

Inspection Date: _____ Time: _____

Routine Inspection Response to Complaint Follow-up Inspection Business Type: Industrial Commercial

Facility Name: _____ Contact Name: _____

Site Address: _____ Phone: _____

PRIORITIZATION VERIFICATION:

Percent of Activities Outdoors and Uncovered: <25% 25-50% 50-75% >75%

Approximate Impervious Area: <5,000 sq. ft. 5,000-100,000 sq. ft. >100,000 sq. ft.

Amount of Raw Material Kept Indoors or Properly Covered Outdoors: ALL SOME NONE

Watershed: _____

SIC Code: _____

SIC Description: _____

Observed Business Type: _____

Is the facility covered under a stormwater permit? (Check all that apply)

Does not need coverage No, but may need to refer to Regional Board Individual NPDES Permit General Industrial Permit (filed NOI)

SWPPP on site? Yes No Facility's WDID #: _____ Business License #: _____

ACTIVITIES (FACT SHEET)	COMMENTS AND CORRECTIVE ACTIONS REQUIRED
Landscape Maintenance (IC7)	
Outdoor Drainage from Indoor Areas (IC9)	
Outdoor Loading/Unloading of Materials (IC10)	
Outdoor Process Equipment Operations and Maintenance (IC11)	
Outdoor Storage of Raw Materials, Products, and Containers (IC12)	
Parking and Storage Area Maintenance (IC15)	
Spill Prevention and Cleanup (IC17)	
Vehicle and Equipment Fueling (IC18)	
Vehicle and Equipment Maintenance and Repair (IC19)	
Vehicle and Equipment Washing and Steam Cleaning (IC20)	
Waste Handling and Disposal (IC21)	

ADDITIONAL INFORMATION PROVIDED ON SUPPLEMENTAL PAGE PHOTOS TAKEN BMP INFORMATION PROVIDED

CORRECTIVE ACTION NONE CORRECT DEFICIENCIES – Fact Sheets _____

FOLLOW UP INSPECTION REQUIRED NO YES BY _____

DEFICIENCIES CORRECTED YES NO RESULT _____

This report is furnished to the facility representative as a measure to evaluate the implemented BMPs at your facility to prevent stormwater pollution. Your facility may be subject to an enforcement action if the noted deficiencies are not corrected by _____. To request a re-inspection to review the correction of deficiencies noted above, please contact the inspector noted below; otherwise, one will be scheduled prior to the above date.

Facility Representative Signature*: _____ Printed name: _____ Date: _____

Inspector Signature: _____ Date: _____

*Signature indicates that the above items were discussed and a copy of the Inspection Report was received.

Industrial/Commercial Inspection Form- Activities/BMP Checklist

ACTIVITIES (FACT SHEET)	BMP ASSESSMENT	CONCLUSION*		
General Activities	Outside areas kept neat and clean?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are storm drains inlets labeled and maintained?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Does pavement sweeping occur?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is wash water contained and disposed of?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are unpaved outdoor areas protected from water and wind erosion?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are employees trained on an on-going basis?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Landscape Maintenance (IC7)	Efficient irrigation (i.e. no site runoff)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are pesticides/fertilizers used and stored properly?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is the dirt/debris from landscaped areas contained?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Outdoor Drainage from Indoor Areas (IC9)	Materials prevented from being tracked from inside areas?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are materials/wastes stored away from doors/docks?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Outdoor Loading/Unloading of Materials (IC10)	Are storm drain inlets blocked during loading/unloading?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are the loading dock areas maintained?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Outdoor Process Equipment Operations and Maintenance (IC11)	Exposed equipment covered?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Outdoor Storage of Raw Materials, Products, and Containers (IC12)	Exposed materials covered?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are materials stored off the ground (pallets, etc.)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Do materials/containers have secondary containment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Parking and Storage Area Maintenance (IC15)	Are parking/storage areas maintained?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Excessive oil stains prevented?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Spill Prevention and Cleanup (IC17)	Are spill containment and cleanup materials readily available?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are absorbent materials removed and properly disposed of in a timely manner?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Vehicle and Equipment Fueling (IC18)	Is the fueling area designed to prevent run-on of stormwater and run-off of spills?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is vehicle fueling contained in a designated area to prevent accidental discharges?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is fueling area regularly inspected?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are leaks and drips cleaned in a timely manner?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Vehicle and Equipment Maintenance and Repair (IC19)	Are vehicle/equipment maintenance activities indoors or contained in a designated area?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are drip pans/containers used?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is clarifier/oil-water separator maintained regularly?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are leaks and drips from equipment cleaned in a timely manner?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Vehicle and Equipment Washing and Steam Cleaning (IC20)	Is vehicle/equipment washing done in designated area?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is wash area equipped with a clarifier and connected to the sanitary sewer?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is the wash area contained?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Waste Handling and Disposal (IC21)	Is area designed to prevent run-on of stormwater and run-off of spills?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is there evidence of outdoor use of hose bibs for cleaning?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Are trash receptacles covered?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Do materials/containers have secondary containment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

*A "no" answer indicates that a corrective action may be necessary