

**SECTION C-10**

**ILLEGAL DISCHARGES/ILLICIT CONNECTIONS**

**PROGRAM EFFECTIVENESS ASSESSMENT  
2006-07**





## C-10.0 ILLEGAL DISCHARGES/ILLICIT CONNECTIONS (ID/IC)

### C-10.1 Introduction (LIP Section A-10.1)

Since illegal discharges and illicit connections can be significant sources of pollutants for the municipal storm drain system, the County's LIP includes a comprehensive program for detecting, responding to, investigating and eliminating these types of discharges/connections in an efficient and timely manner.

### C-10.2 Illegal Discharges

#### C-10.2.1 Organization Chart

Through the submittal of its organization chart, **Figure A-10.1** of the LIP, the County identified which Departments were responsible for the implementation of this stormwater program element. No changes were made to the organizational chart during this reporting period.

#### C-10.2.2 Authorized Inspector Designations

The County's LIP, Water Quality Ordinance, and Enforcement Consistency Guide (**Exhibit 4.I** of the 2003 DAMP) identify County Authorized Inspectors as those persons designated by the Director of the Resources & Development Management Department (RDMD) to investigate compliance with, detect violations of, and take actions pursuant to the Water Quality Ordinance.

A list of County Authorized Inspectors and relevant contact information is provided in the following table:

#### 2006-07 Summary of County Authorized Inspectors

##### Primary Authorized Inspectors

Name	Department	E-mail Address	Phone Number
Duc Nguyen	RDMD, Watershed & Coastal Resources	Duc.Nguyen@rdmd.ocgov.com	(714) 973-6690
James Fortuna		James.Fortuna@rdmd.ocgov.com	(714) 973-3167
Grant Sharp		Grant.Sharp@rdmd.ocgov.com	(714) 973-6691
Christine Hanson		Christine.Hanson@rdmd.ocgov.com	(714) 973-3166



### Alternate Authorized Inspectors

Name		E-mail Address	Phone Number
Bruce Moore	RDMD, Watershed & Coastal Resources	Bruce.Moore@rdmd.ocgov.com	(714) 567-6373
Richard Boon		Richard.Boon@rdmd.ocgov.com	(714) 973-3168

#### C-10.2.3 Detection of Illegal Discharges and Illicit Connections

The County has a number of programs that proactively facilitate the detection of existing and/or potential sources of illegal discharges and illicit connections including the following:

- Municipal Activities (Section A-5 of LIP) – RDMD Operations & Maintenance (O&M) staff are trained to assist in the identification of illegal discharges and illicit connections during their daily activities inspecting/repairing/maintaining public infrastructure throughout the County’s jurisdiction. County O&M staff is trained to refer water quality problems to the County’s Authorized Inspectors.
- Public Education (Section A-6 of LIP) –All public education materials distributed include the 24 hr. water pollution problem reporting phone number (714) 567-6363) and the website address for online reporting of pollution and drainage problems: [http://www.ocwatersheds.com/WQHotline/wqh\\_introduction.asp](http://www.ocwatersheds.com/WQHotline/wqh_introduction.asp)
- New Development/Significant Redevelopment Program (Section A-7 of LIP) – The inspection of projects with approved final Water Quality Management Plans (WQMPs) will assist with the identification of site-specific post-construction structural best management practices that are either not functioning adequately or are not being maintained properly.
- Construction Activities (Section A-8 of LIP) – County building, grading and public works inspectors are trained to assist with the identification of illegal discharges from construction sites.
- Existing Development Programs (Section A-9 of LIP) – County Authorized Inspectors perform inspections to assess BMP implementation at industrial and commercial businesses. Conditions that pose a threat to water quality are addressed.
- Water Quality Monitoring Program (Section A-11 of LIP) – The collection of water quality monitoring data identifies problem areas where ID/IC source investigation efforts may need to be focused.



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C-10.2.4 Water Pollution Reports/Complaints/Notifications

In order to have a successful ID/IC program, the County provides several means for the public to report information about potential or existing problems so that they can be mitigated as quickly as possible. The County has established a Countywide 24 hour bilingual water pollution complaint hotline phone number (714/567-6363) to receive water pollution complaints and incident information. Reports, complaints and notifications are also received through a website reporting form ([http://www.ocwatersheds.com/WQHotline/wqh\\_introduction.asp](http://www.ocwatersheds.com/WQHotline/wqh_introduction.asp)). The hotline number and website are included on all public education material.

A summary of the sources of all water pollution reports/complaints/notifications received by the County during this reporting period and the previous is provided below.

**2006-07 Summary of Water Pollution Complaints/Incidents Reported**

Source of Water Pollution Complaints/Incidents	Number of Complaints/Incidents Reported		Incidents Reported to Regional Board as Presenting a Threat to Human or Environmental Health	
	2006-07	2005-06	2006-07	2005-06
County Staff (O&M Staff, Construction Inspectors, etc.)	103	113	7 to Santa Ana Regional Board  4 to San Diego Regional Board	8 to Santa Ana Regional Board  3 to San Diego Regional Board
Other Cities/ Agencies	52	37		
Water Pollution Hotline & Website	126	107		
Direct Public Contact (calls, e-mails)	25	37		
Businesses	2	2		
Other	3	2		
<b>Total Number of Reports</b>	311	298		

The above data represents the total number of reports/complaints/notifications received by the County during the reporting period. The total number of reports increased slightly (4%) over the previous reporting period (from 298 to 311). The biggest changes from the prior reporting period occurred in the sources of the reports, where reports from County Staff (O&M Staff, Construction Inspectors, etc.) decreased by 9%, reports from other cities/agencies increased by 41%, reports submitted through the 24 hr. water pollution hotline & website increased by 18%, and reports resulting from direct public contact (calls, e-mails) decreased by 32%. Some of these changes can be attributed to an effort that was initiated by the Permittees in 2005-06 to standardize how this information is reported.



### C-10.2.5 Response Procedures

The County's Authorized Inspectors follow procedures outlined in the *Investigative Guidance Manual* (developed for use during the 2004-05 reporting period) and Enforcement Consistency Guide (**DAMP Exhibit 4.I**) when responding to and investigating water pollution complaints. The response procedures generally include record keeping, notifications and response requests, response activities, investigations, clean-up activities, reporting and education/enforcement. In order to ensure that the program is efficient and effective, the County has instituted regular documentation procedures for its water pollution complaint and spill response activities. To assist them in implementing these procedures, a series of forms and guidance materials were developed and are included in **Exhibits A-10.I** and **A-10.II** of **Section A-10** of the LIP. There were no modifications to these forms during the reporting period.

### C-10.2.6 Water Pollution Incident Summary

As a part of the jurisdictional ID/IC Program, the County's Authorized Inspectors receive and respond to a variety of water pollution reports and complaints.

#### *Reporting Summary*

In order to avoid duplication, only one category was used per incident (i.e.: if a complaint was received by County staff but referred to the appropriate city, agency or department for inspection and follow up, the incident was reported in the Referral category only). For reporting purposes, the following definitions were used:

- Notification - An incident that is reported to the County that does not require any follow up such as an investigation or enforcement. This would include any incidents where the material did not enter the storm drain system and was in the process of being cleaned up or it may have entered the storm drain but was determined to have insignificant impact and did not require further action.
- Complaint - A minor incident that is reported to the County that requires an investigation as soon as possible. This would include where the discharge is alleged to have already occurred but is not posing an immediate threat to human health or the environment. Examples of this may include: oil that has leaked from a vehicle parked on the street and has soaked into the asphalt or a past discharge from a residence or facility.
- Response Request - An incident that is reported to the County that requires an immediate investigation/response due to the threatened release/impact to human health or the environment.
- Referral to another agency - The incident is outside of the County's jurisdiction and the complaint has been referred to another city or agency for investigation and follow-up.

The following tables provide information regarding the water pollution incidents that have been reported and required action by the County.



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2006-07 Breakdown of Reports Received

Type of Report	Number of Reports	
	2006-07	2005-06
Notification	33	40
Complaint	123	110
Response Request	37	37
Referral to Cities or other agency	118	103
<b>Total Number of Incidents</b>	<b>311</b>	<b>298</b>

Compared to the 2005-06 reporting period, the number of notifications received by the County decreased 18%, complaints increased 12%, and the number of referrals to cities or other agencies increased 15%. It is interesting to note that the number of response requests received during the reporting period was identical to 2005-06 and that overall, the total number incidents increased only slightly.

The water pollution complaints and response requests involve a wide variety of materials. The set of categories and sub-categories were established as shown below.

General Categories and Sub-categories of Materials Involved in Water Pollution Complaints/Incidents

<b>Hydrocarbons</b> Animal Fat Automotive Fluids Crude Oil Diesel Fuel Gasoline Grease Hydraulic Fluid Jet Fuel Misc. Oils Motor Oil Sheen Vegetable Oil Wax Other	<b>Inorganic Compounds</b> Acid Base Paint: Dry Scrapings/Residual Paint: Latex Paint: Oil-based Other	<b>Metals</b> Aluminum Cadmium Chromium Copper Lead Mercury Zinc Other	<b>Nutrients</b> Fertilizer Other	<b>Organic Compounds</b> Degreaser Ethylene Glycol/Antifreeze Solvent Other	<b>Discharge Exceptions</b> Air Conditioning Condensate Crawl Space Pump Water Dechlorinated Pool Discharges Diverted Stream Flows Fire Suppression Runoff Groundwater Infiltration/Uncontaminated Pumped Groundwater Irrigation Non-commercial Vehicle Washing Passive Footing Drains Passive Foundation Drains Potable Water Riparian/Wetland Flows Rising Groundwater/Natural Springs Stormwater Other Regional Board-Approved Discharges
<b>Pathogens and Coliforms</b> Animal Feces Sewage Other	<b>Wastewater</b> Bilge Water Concrete Slurry Contaminated Groundwater Cooling Water Dye Greywater Pool/Spa Discharge* Reclaimed Water Wash Water Wastewater Other	<b>Pesticides</b> Herbicide Pesticide Other	<b>Sediment</b> Sediment Other	<b>Trash and Debris</b> Brick/Cement/Plaster/Grout Food Waste Green Waste Solid Waste/Trash Other	<b>Miscellaneous</b> Abandoned Drums Chemicals Did not observe Liquid Odor Residue Solid Unidentified Other

\* Pool/spa discharges in this category are discharges that contain chlorine (>0.1ppm), filter media, algae, etc.



The following table summarizes the number of incidents that required action by County staff and the categories of materials involved:

### 2006-07 Jurisdictional Summaries of Incidents Requiring County Response

Categories of Materials	Number of Complaints/Incidents	
	2006-07	2005-06
Discharge Exceptions	3	3
Hydrocarbons	21	22
Inorganic Compounds	11	3
Miscellaneous	39	63
Metals	1	0
Nutrient	1	0
Organic	1	0
Pathogens/Coliforms	13	13
Pesticides	0	1
Sediment	7	9
Trash/Debris	23	27
Wastewater	28	14
<b>Total Number of Incidents</b>	<b>139</b>	<b>155</b>

The County investigated or responded to 139 incidents, a decrease of 10% from the previous reporting period. The number of incidents involving inorganic compounds increased almost three-fold from the previous reporting period while incidents involving trash and debris decreased 15%. Another change from the 2005-06 reporting period was a 100% increase in the number of incidents involving wastewater.

Water pollution incidents which are determined to pose an existing or potential significant threat to public health or the environment are reported to the Regional Boards within 24 hrs. with a written report provided within 5 days. During the reporting period, the County reported a total of 11 pollution incidents to the Regional Boards.



### Pollution Incidents Reported to the Regional Board

Region	2006-07	2005-06
Santa Ana	7	8
San Diego	4	3
<b>Totals:</b>	<b>11</b>	<b>11</b>

Four of the incidents reported in the Santa Ana Region and two in the San Diego Region were a result of water pollution responses the County performed on behalf of cities through a Water Quality Ordinance Implementation Agreement. Brief descriptions of the notifications made during the 2006-07 reporting period are as follows:

#### Santa Ana Regional Board Notifications

- A roofing company in the City of La Habra channel was discovered to have been discarding/dumping material into an adjacent Orange County Flood Control District (OCFCD) channel. The County coordinated with the City of La Habra and issued the property owner an Administrative Compliance Order which required cleanup of the County's right of way as well as the implementation of BMPs to prevent any further impacts to the stormdrain system. The property owner complied.
- A greyish colored wastewater discharge was observed impacting OCFCD's C05 Channel from a nearby strip mall in the City of Santa Ana. The source of the discharge was identified as greywater/wash water from the sinks of multiple eating establishments at a strip mall. Sanitation crews responded to clean the impacted areas of the curb and gutter as well as remove the wastewater contained in the underground storm drain line. HCA Environmental Health closed down two of the eating establishments in the strip mall and the City of Santa Ana followed-up with enforcement action.
- A large amount of pink foam and discolored water was observed in the Santa Ana River in Yorba Linda. The source of the discharge was identified as a 5 gallon carwash detergent bucket that had cracked and was placed next to a catch basin. The responsible party hired a cleanup contractor to conduct a cleanup under the County's direction. An unknown amount of soap-impacted runoff entered the river, but approximately 100,000 gallons were pumped directly from the river and into the sanitary sewer system during the cleanup. The California Department of Fish & Game (DFG) is filing a case with the Orange County District Attorney's (DA) Office.
- An extensive amount of white foam was observed in a channel that enters the County's Craig Regional Park in Fullerton. Dead Bluegill fish were observed in the channel which flows into Craig Lake. At an upstream box culvert in the City of Brea, a large amount of oil and grease (likely from food preparation activity) was observed. The City of Brea coordinated with the County in performing a cleanup until a responsible party could be identified. The channel was diverted to the sanitary sewer system to prevent impact to Craig Lake. The oil and grease at the upstream culvert was removed by a cleanup contractor and disposed of at the Orange County Sanitation District's Plant 1. The





County, City of Brea, and DFG conducted an exhaustive joint area reconnaissance during the afternoon to identify a responsible party. No single source was located; however, there were many potential contributors within the drainage area. The County, City of Brea, DFG, and the DA's Office developed a plan to monitor the drainage area.

- An unidentified vehicle struck a power pole in the City of Garden Grove, dislodging three transformers which released 120 gallons of non-PCB containing mineral cooling oil into the street, storm drain, and concrete channel. The utility company which owned the transformers conducted a cleanup of the mineral oil in the channel under the County's direction.
- Trash and debris were observed spilling into Santiago Creek from a private residence. Abandoned paint cans and other unknown substances were also abandoned on the edge of the Creek. The property owner was issued an Administrative Compliance Order, requiring cleanup of the identified items and implementation of BMPs. The property owner complied with the order and conducted cleanup of the site.
- Approximately 30 gallons of plating material had spilled from a property into an adjacent channel, A03S05. Approximately 100 yards of the channel was impacted by the release of the plating material. No nuisance flow in the channel allowed for 100% capture of released material. City of Fullerton Fire responded to oversee cleanup and issue enforcement against business and required them to clean all impacted areas.
- Approximately 1,000 dead fish were observed in the Santa Ana River downstream of the Orange County Water District's inflatable diversion dam. The County's investigation included inspection of the River for several days, water quality measurements and interviews with several people who had observed the dead fish. Potential causes include: temperature increase and algal bloom. No spills or other adverse conditions were reported or observed.

### **San Diego Regional Board Notifications**

- Five 5 gallon containers of chlorine and three 1 gallon containers of muriatic acid spilled out of an unidentified vehicle in the City of Laguna Hills. The chlorine and muriatic acid spilled onto the public right of way. County Staff responded to the incident and oversaw the cleanup.
- A petroleum sheen and chemical odor were detected in Aliso Creek in the City of Lake Forest. Absorbent booms were deployed in the Creek to remove the pollutants. An exhaustive, multi-jurisdictional source investigation of the drainage area, which extended into the City of Mission Viejo, failed to identify a responsible party.
- A painting contractor cleaned out equipment into a catch basin at a mall in the City of Mission Viejo. The County on behalf of the City, conducted an investigation and oversaw a cleanup of the impacted areas. DFG filed an enforcement case against the painting contractor through the DA's Office.



### C-10.2.7 Enforcement Summary

The County's Authorized Inspectors undertake enforcement activities according to the County's adopted Water Quality Ordinance and the accompanying Enforcement Consistency Guide (**DAMP Exhibit 4.I**).

Water pollution enforcement may be handled administratively or in more serious instances, be prepared for criminal prosecution. As provided for in the Enforcement Consistency Guide, when selecting enforcement options, the County's Authorized Inspectors ensure that violations of a similar nature receive a consistently similar type of enforcement remedy. More severe enforcement options may be utilized depending on variables such history of non-compliance or failure to take good faith actions to eliminate continuing violations or to meet a previously imposed compliance schedule. A summary of the enforcement actions taken during the last two reporting periods are provided below.

#### 2006-07 Summaries of Enforcement Actions

Enforcement Type	Total	
	2006-07	2005-06
Educational Letter (EL)	1	1
<b>Administrative Enforcement</b>		
Notice of Noncompliance (NON)	27	21
Administrative Compliance Order (ACO)	9	7
Cease and Desist Order (CDO)	0	0
<b>Criminal Enforcement</b>		
Misdemeanor (Mis)	0	1
Infraction (Inf)	0	0
Issuance of Citation (IOC)	2	0
Other: (Criminal prosecution cases)	0	0
<b>Totals:</b>	<b>39</b>	<b>30</b>

The total number enforcement actions for the reporting period increased 30% from the previous reporting period. This overall increase is due to a greater number of Notices of Noncompliance (29%) and Administrative Compliance Orders (29%) being issued to violators of the County's Water Quality Ordinance.



#### C-10.2.8 Enforcement Case Summary

The County did not submit any cases to the DA's Office during the reporting period. However, several incidents described under **Regional Board Notifications** resulted in coordination with DFG and the DA's Office in preparing case reports for enforcement action.

#### C-10.2.9 Countywide Area Spill Control (CASC) Program

During the reporting period, the County and Orange County Sanitation District continued coordination of a sewage spill prevention and response demonstration project. The project previously called the "Tustin Area Spill Control (TASC) Demonstration Project" has been expanded and renamed to "Countywide Area Spill Control" Program. Major tasks completed during this reporting period were as follows:

- Continued project management and coordination;
- Further development /implementation of tools such as maps, staging areas and SSO response procedures;
- Obtained primary and backup emergency response cleanup contractors for containment and recovery of SSOs from the flood control channels;
- Executed a Memorandum of Understanding for delineating jurisdictional and financial responsibilities for project partnerships;
- Conducted an additional field simulated SSO response exercise;
- Public education and outreach activities;
- Expanded the project area to include the Cities of Villa Park and Orange; and,
- Expanded the demonstration project into a permanent program.

Additional details are presented in **Section C-3.3**.

#### **C-10.3 Illicit Connections (LIP Section A-10.5)**

The County has developed a drainage facility inspection and documentation program to identify and eliminate illicit connections to the storm drain system. Illicit connections to the storm drain system are prohibited under County ordinance. During the reporting period, no illicit connections were identified.

#### **C-10.4 Source Investigations (LIP Section A-10.4.1)**

Source investigations may be conducted when an illegal discharge or illicit connection is detected or suspected, and the source is not readily identifiable. The purpose of the investigation is to identify the source so that appropriate action can be taken to protect the storm drain system and prevent the contribution of pollutants to receiving waters. Source investigations can be triggered based on a number of factors such as visible or odor problems and they can also be initiated based on water quality data.



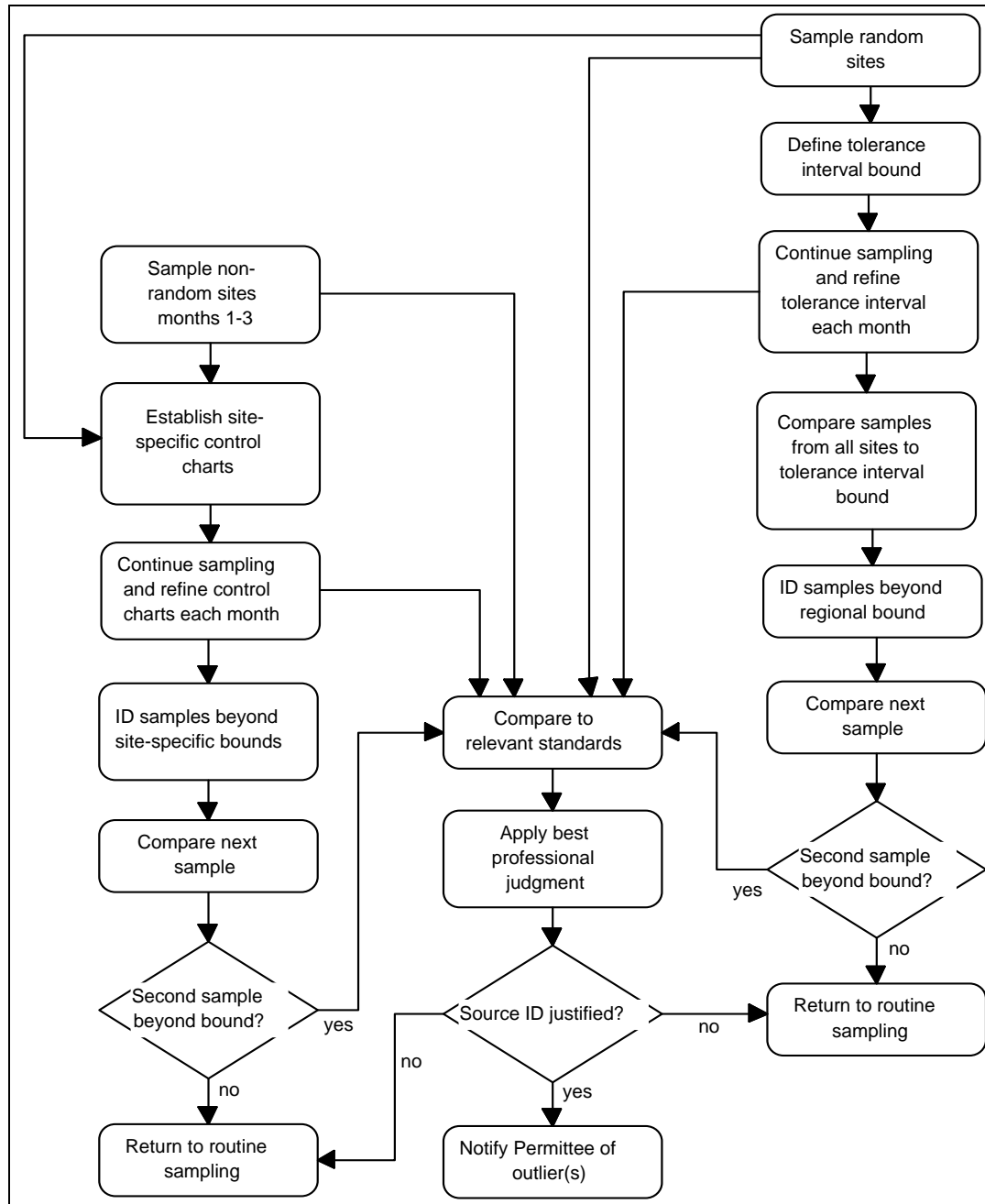
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The Dry Weather Monitoring Program (**DAMP Exhibit 11.II**) was developed in 2003 for implementation countywide as a means of identifying illegal discharges and illicit connections through a field screening program. Notifications are made to the appropriate jurisdiction for immediate follow-up when problems at a drain are detected in the field. In addition, source investigations may be required when data from the dry weather monitoring indicates that a constituent is consistently higher than normal background levels (these background levels are calculated on an ongoing basis and are called **Tolerance Intervals**). The procedure for determining this is described in great detail in **Section 3.3** of **DAMP Exhibit 11.II**. The following flow-chart (**Figure 3-6** of **DAMP Exhibit 11.II**) illustrates the methodology used in determining whether or not a source investigation is needed based on dry weather monitoring data:



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During the reporting period, the County applied this approach to dry weather monitoring sites within its jurisdiction. The following table summarizes the results:



### Summary of 2006-07 Dry Weather Monitoring Results

Region	Drain Designation	Random or Targeted	Watershed	Location	Tolerance Interval Exceedances during Reporting Period		Source Investigation Conducted?
					Constituent(s) and Number of Exceedances	Consecutive (If more than one)?	
San Diego	COL02P50	Random	San Juan Creek	Ladera Ranch	N/A	N/A	N/A
	COL02P55	Random			Ammonia, 2	Yes	During 2005-06 Reporting Period
					Nickel, 2	Yes	
					Cadmium, 2	Yes	
					Nitrate, 1	No	
					Turbidity, 1	No	
Santa Ana	COF13@FH	Random	Newport Bay	Tustin (Unincorp.)	N/A	N/A	N/A
	COF07S01	Targeted			Nitrate, 2	Yes	No
	COSACC@F01	Targeted		Newport Beach (Unincorp.)	Turbidity, 1	Yes	No
					Ammonia, 2		
					Nitrate, 1		
					Surfactants, 1		
					Phosphorous, 2		
					Enterococcus, 1		
Copper, 3							

As the table illustrates, one drain (COL02P55) within the County's jurisdiction in the San Diego Region experienced consecutive exceedances of the tolerance intervals for ammonia, nickel and cadmium during the reporting period. A source investigation of this drainage area was conducted by the County during the 2005-06 reporting period which appears to have had effective results. There were no exceedances of bacteria tolerance intervals (7 total exceedances prior to this reporting period) and the mean average results for cadmium and nickel, while still exceeding the tolerance intervals, have decreased.

- Mean concentration of Nickel at COL02P55:
  - May 2003 - June, 2006 -145 mg/L
  - July 2006 - August, 2007 - 95 mg/L
- Mean concentration of Cadmium at COL02P55:
  - May 2003 - June, 2006 - 42 mg/L



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- o July 2006 - August, 2007 - 14 mg/L

During the 2007-08 reporting period, the County will be continuing its source investigation efforts of the COL02P55 drainage area, which is located within the community of Ladera Ranch.

Two drains (COF07S01 & COSACC@F01) within the County's jurisdiction in the Santa Ana Region experienced consecutive exceedances of tolerance intervals during the reporting period. The County will be performing source investigations within each of these drainage areas during the 2007-08 reporting period.

### **C-10.5 Training and Outreach (LIP Section A-10.7)**

The education and training of the County's Authorized Inspectors is key in the successful implementation of the program especially since they are in the public eye when conducting investigation efforts and proceeding with enforcement actions.

#### C-10.5.1 Training

One of the primary methods that the County's Authorized Inspectors and other key staff are trained is by having them attend the NPDES Inspection Committee meetings. During the reporting period the County's Authorized Inspectors coordinated, conducted and attended these committee meetings. The following table lists the training subjects and presenters for 2006-07 meetings.



### 2006-07 Summary of NPDES Inspection Committee Training Presentations

Training Module	Training Dates	Agency	Trainer
Cal OSHA -Program Overview and Case Investigations	September 14 <sup>th</sup> , 2006	Cal OSHA	Jim Brown
DTSC Criminal Investigations - Program Overview and Case Investigations		DTSC	Sam Richardson
Regional Water Quality Control Board - Program Overview and Case Investigations	November 16 <sup>th</sup> , 2006	RWQCB - Santa Ana	Steve Mayville
Orange County Sanitation District - Program Overview and Case Investigations		OCSD - Source Control Div.	Deon Carrico
Annual Orange County Stormwater Program - Inspection & Enforcement Report Card (Program Effectiveness Assessment - Unified Report Summary)	January 18 <sup>th</sup> , 2007	County of Orange	Richard Boon
Tustin Area Spill Control (TASC) Demonstration Project		County of Orange	Duc Nguyen
SARWQCB Industrial Inspection Overview	April 19 <sup>th</sup> , 2007	RWQCB-Santa Ana	Marc Brown
NPDES Dry Weather Monitoring and Reconnaissance Program and Follow-up		County of Orange	Grant Sharp

The County has also trained its own Authorized Inspectors and other staff by having them attend Permittee sponsored training as well as other regional training and workshop opportunities. The Permittee sponsored training included modules in **Section B-10** of **Appendix B** of the DAMP. These ID/IC training modules have constantly evolved and are now some of the most effective trainings available. The primary shift has been towards a “hands-on” training approach. For a current list of the ID/IC training modules (see **Section A-10.7.1** of the County’s LIP included as **Attachment C-10.1** of this report).

#### C-10.5.2 Outreach

As a part of the response activities, the Authorized Inspectors provide outreach materials to businesses and residents who may have been identified as a responsible party for an illegal discharge or illicit connection. These materials can range from BMP fact sheets, manuals, posters, and brochures, to door hangers that can be left at properties where a complaint was reported. Specific information on outreach during the 2006-07 reporting period is included in **Section C-6** of this report.





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### **C-10.6 ID/IC Program Modifications**

As the last step in the PEA, the County has evaluated the results of the program effectiveness assessment to determine if any program modifications are necessary in order to comply with the Third Term Permits.

During the 2006-07 reporting period, no modifications were made to the County's ID/IC Program.