

SECTION C-10

ILLEGAL DISCHARGES/ILLICIT CONNECTIONS

**PROGRAM EFFECTIVENESS ASSESSMENT
2009-10**



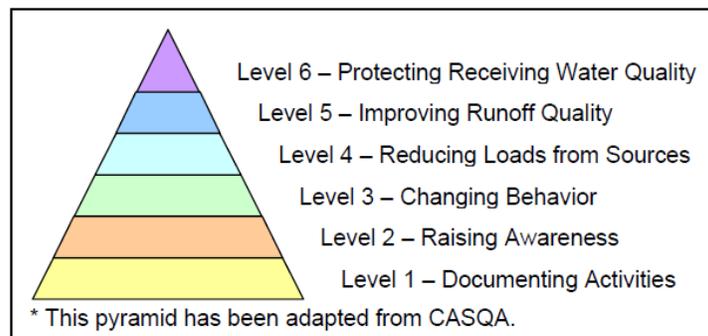


C-10.0 ILLEGAL DISCHARGES/ILLICIT CONNECTIONS (ID/IC)

C-10.1 Introduction (LIP Section A-10.1)

Illegal discharges and illicit connections can be a significant source of pollutants for MS4, consequently, the County's Local Implementation Plan (LIP) includes a comprehensive program for detecting, responding to, investigating and eliminating these types of discharges/connections in an efficient and timely manner.

As described in detail in **Section C-2.5** of this PEA, the County utilizes the CASQA method of effectiveness assessment in order to demonstrate if program elements, activities, BMPs, etc., are resulting in desired outcomes. CASQA identifies six Outcome Levels (see pyramid below) and for each measure the County reports, the associated Outcome Level (more than one level may apply) is indicated by a colored triangle with a number.



C-10.2 Illegal Discharges

C-10.2.1 Organization Chart

Through an organization chart, **Figure A-10.1** of the LIP, the County has identified which Departments are responsible for the implementation of this stormwater program element.

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**) define Authorized Water Quality Ordinance Inspectors (Authorized Inspectors) as those persons designated by the Director of OC Public Works (and Director, John Wayne Airport for County Ordinance) to investigate compliance with, detect violations of, and take actions pursuant to the County and Orange County Flood Control District Water Quality Ordinance.

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

2009-10 Summary of County Authorized Inspectors



Primary Authorized Inspectors

Name	Department	E-mail Address	Phone Number
Duc Nguyen	OC Public Works, OC Watersheds	Duc.Nguyen@ocpw.ocgov.com	(714) 955-0676
James Fortuna		James.Fortuna@ocpw.ocgov.com	(714) 955-0677
Grant Sharp		Grant.Sharp@ocpw.ocgov.com	(714) 955-0674

Alternate Authorized Inspectors

Name		E-mail Address	Phone Number
Bruce Moore	OC Public Works, OC Watersheds	Bruce.Moore@ocpw.ocgov.com	(714) 955-0660
Richard Boon		Richard.Boon@ocpw.ocgov.com	(714) 955-0670

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) – OC Public Works 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. OC Public Works 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 (1-877-89SPILL) and the website address for online reporting of pollution and drainage problems: <http://www.ocwatersheds.com/WaterPollutionHotline.aspx>
- New Development/Significant Redevelopment Program (Section A-7 of LIP) – The inspection of projects with approved final Water Quality Management Plans (WQMPs) assists 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 construction 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 immediately addressed.



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- 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.

C-10.2.4 Water Pollution Reports/Complaints/Notifications

In order to implement 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 (English/Spanish), toll-free water pollution complaint hotline (1-877-89SPILL) to receive water pollution complaints and other related information. Reports, complaints and notifications are also received through a website reporting form on the County’s website, at <http://www.ocwatersheds.com/WaterPollutionHotline.aspx>. The hotline number and website address 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 years of permit term is provided below.

Summary of Water Pollution Complaints/Incidents Reported



Source of Water Pollution Complaints/Incidents	Number of Complaints/Incidents Reported								
	2009 -10	2008 -09	2007 -08	2006 -07	2005 -06	2004 -05	2003 -04	2002 -03	Totals (since 2002-03)
County Staff (O&M Staff, Construction Inspectors, etc.)	48	92	85	103	113	273	494	344	1552
Other Cities/Agencies	34	53	59	52	37	24	40	31	329
Water Pollution Hotline & Website	107	108	108	126	107	94	15	15	680
Direct Public Contact (calls, e-mails)	15	12	19	25	37	8	85	39	240
Businesses	3	1	2	2	2	0	25	19	54
Other	12	7	2	3	2	45	19	13	103
Total Number of Reports	219	273	275	311	298	444	678	461	2,958

Analysis of the data over the last eight reporting periods provides valuable feedback. A shift in the 2005-06 reporting period to a more refined, consistent method of data collection is responsible for the decrease in the total number of reports. This program modification has resulted in more accurate data collection (Level 1 Outcome).



Since the 2005-06 reporting period, numbers have been fairly consistent from year to year, with only slight fluctuations (Level 2 Outcome). The total number of complaints/ incidents reported by County staff and other cities/agencies in 2009-10, was 45% lower than the previous reporting period. A large percentage of these are typically generated by construction activity and it is believed that the economic downturn which has resulted in less construction, combined with improvements in inspection/regulation of projects, has contributed to this decrease.

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 (Exhibit 4.I of the 2003 DAMP)* 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.

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 a scheduled investigation. 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.



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

2009-10 Breakdown of Reports Received

Type of Report	Number of Reports	
	2009-10	2008-09
Reporting Period		
Notification	33	30
Complaint	76	99
Response request	32	44
Referral to cities or other agency	78	100
Total Number of Incidents	219	273

Each and every water pollution complaint/report the County receives is treated as a top priority, however not all of them require follow-up response or investigation by the County. The following table summarizes the number of incidents during the reporting period that required response/investigation by County staff and the categories of materials involved.



Jurisdictional Summary of Incidents Requiring County Response

Categories of Materials	Number of Complaints/Incidents	
	2009-10	2008-09
Reporting Period		
Discharge exceptions	7	8
Hydrocarbons	19	23
Inorganic compounds	7	6
Miscellaneous	8	13
Metals	1	0
Nutrient	0	0
Organic	1	1
Pathogens/coliforms	19	13
Pesticides	2	2
Sediment	7	15
Trash/debris	14	12
Wastewater	17	35
Total Number of Responses	102	128



In responding/investigating 102 water pollution complaints and reports during the reporting period, County staff was successful in many instances, in preventing pollutants from impacting the stormdrain system (Level 4, 5 and 6 Outcome).

C-10.2.7 Regional Board and other Agency Notifications

Water pollution incidents determined to pose an existing or potential significant threat to public health or the environment are reported to the appropriate Regional Board. Depending on the nature of the incident, notification of the California Emergency Management Agency (CalEMA) and the California Department of Fish & Game (DFG) may also be required. The following table summarizes the pollution incidents the County responded to during the reporting period which triggered notifications. Some of the incidents described in the table involved multiple agencies and jurisdictions and where indicated, notifications may have been made by other parties. A number of these incidents resulted in pollutants being prevented from impacting the stormdrain system or receiving waters (Level 4 Outcome).

Pollution Incidents the County Responded to Requiring Regional Board/CalEMA/DFG Notification

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Incident	PNIR* Number	Date of Incident	Regional Board Notified? (Santa Ana or San Diego)	CalEMA Notified? (Control No.)	DFG Notified?
Accidental diesel release from County heavy equipment performing maintenance on the mouth of Aliso Creek.	8206	10/28/09	San Diego	Yes (09-7269)	No
A large sewage line in an unincorporated residential neighborhood slowly leaked sewage for several days before any agency was notified.	7905	11/11/09	Santa Ana	No	No
Private sewer line rupture in the unincorporated County caused sewage to overflow into the stormdrain system.	8210	12/18/09	Santa Ana	Yes (09-8432)	No
A vessel carrying illegal immigrants crashed onto Aliso Creek Beach releasing multiple fuel containers into the mouth of Aliso Creek.	8132	12/30/09	San Diego	Yes (09-8624)	Yes



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Incident	PNIR* Number	Date of Incident	Regional Board Notified? (Santa Ana or San Diego)	CalEMA Notified? (Control No.)	DFG Notified?
Illegal pumping of polluted stormwater runoff from a business in Placentia directly into the County's flood control channel causing significant erosion to the channel levee.	8137	1/21/10	Santa Ana	No	No
Illegal discharge of crude oil from an oil production facility in Huntington Beach impacted a County flood control channel requiring extensive cleanup.	8135	1/21/10	Santa Ana	Yes (10-0540)	Yes
A construction contractor ruptured reclaimed water line resulting in the discharge of 28,000 gallons of reclaimed water.	8315	2/3/10	San Diego	Yes (10-0987)	No
Roofing sealant applied just before a storm was washed by runoff into a stormdrain in Rancho Santa Margarita, impacting Tijeras Creek.	8136	2/5/10	San Diego	Yes (10-0949)	No
Regional board staff forwarded a complaint that a resident was illegally applying herbicides without appropriate permits.	8321	3/19/10	Santa Ana	No	No
24" force main sewage pipe failed resulting in the loss of over 2 million gallons of sewage into Tijeras Creek.	7970	3/23/10	San Diego	Yes (10-1968)	Yes
Private sewage line blockage caused sewage to be discharged into Aliso Creek.	8255	6/25/10	San Diego	Yes (10-3868)	No
Totals:			San Diego Region: 6	Cal EMA reports: 8	DFG: 3
			Santa Ana Region: 5		

* PNIR stands for Pollution Notification/Investigation Request (Number used by County for record keeping purposes)



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C-10.2.8 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 (Exhibit 4.I of the 2003 DAMP).

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 consistent 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.

2009-10 Summary of Enforcement Actions



Enforcement Type	Total	
	2009-10	2008-09
Educational Letter (EL)	2	4
Administrative Enforcement		
Notice of Noncompliance (NON)	15	14
Administrative Compliance Order (ACO)	8	11
Cease and Desist Order (CDO)	0	0
Criminal Enforcement		
Misdemeanor (Mis)	0	0
Infraction (Inf)	0	0
Issuance of Citation (IOC)	0	0
Other: (Criminal prosecution cases)	3	2
Totals:	28	31

Enforcement actions continue to play an important role in increasing knowledge and awareness (Level 2 Outcome) while achieving a desired behavior change that leads to compliance (Level 3 Outcome).

C-10.2.9 Enforcement Case Summary



The County investigated one pollution incident during the reporting period that developed into a criminal enforcement case.



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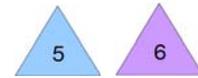
An automotive business conducted auto washing activities on the streets in many Orange County cities without any water control devices (berms, vacuum, etc.). Even after a number of cities issued notices of violations and citations, the company continued to conduct auto washes without any BMPs. The County conducted surveillance and succeeded in documenting the illegal discharge and collected evidence samples for an enforcement case. This enforcement case was submitted to the Orange County District Attorney's Office/Environmental Protection Unit for review and is pending.

An underground confined space inspection of a stormdrain pipe owned by the City of Brea on September 24, 2008 identified a specialized rubber manufacturer as a source of industrial wastewater discharges to Fullerton Creek. This enforcement case was submitted to the Orange County District Attorney's Office/Environmental Protection Unit for review and is pending.

A company renovating a hotel in Placentia had been using the stormdrain catch-basin in the northeast corner of the parking lot to wash out painting equipment. Paint residue as well as paint rollers were visible in the catch-basin as well as the underground stormdrain pipe and Placentia Storm Channel (B01S03). The stormdrain had also been impacted by debris from cutting of tile using a wet saw. This enforcement case was submitted to the Orange County District Attorney's Office/Environmental Protection Unit for review and is pending.

The County also continued to assist the Orange County Sheriff's Harbor Patrol in the processing of boat pollution cases. During the reporting period, the County handled water pollution samples collected by the Harbor Patrol from 2 separate incidents occurring in Newport Harbor. Results of the sample analyses provide support to the Orange County District Attorney's Office/Environmental Protection Unit which handles the prosecution of these boat discharge cases.

C-10.2.10 Countywide Area Spill Control (CASC) Program



The CASC program was activated on three separate SSO incidents during the reporting period. Summaries of these three CASC incidents are as follows:

- Orange County Sanitation District SSO (Cowan Heights)
 - November 11, 2009
 - Volume ~100 gallons (estimated)
 - Cause: tree roots
 - Impact: Peters Canyon Wash
 - Accomplishments:
 - ~3,500 gallons (~100 gallons of sewage) pumped from storm drain system and returned to OCSD sewer system
 - Potential downstream impact was minimized
 - Response Issues:
 - No major issues noted
- Santa Margarita Water District SSO (Rancho Santa Margarita)
 - March 23, 2010



- Volume ~250,000 gallons (initially estimated) raw sewage into creek
- Cause: force main rupture
- Impact: Tijeras Creek, beach closure from Dana Point breakwater to Poche Creek
- Accomplishments:
 - ~2.5 million gallons (1.4 million gallons of sewage) pumped from containment
 - Berm in Tijeras Creek and returned to SMWD sewer system
 - Beach closure area was minimized
 - Number of beach closure days minimized
- Response Issues:
 - Inter-agency coordination needs improvement
 - Access to containment location was difficult
 - Waste recovery manhole not close to containment
- Prothero Mobile Estates Private SSO (Lake Forest)
 - June 25, 2010 in Lake Forest
 - Volume ~2,400 gallons
 - Cause: blocked cleanout
 - Impact: Aliso Creek beach closure
 - Accomplishments:
 - 0.75 mile of sewage impacted storm drain cleaned out
 - Beach closure area was minimized
 - Number of beach closure days minimized
 - Response Issues:
 - Inter-agency coordination needs improvement

Although two of the three incidents occurred in areas that were new to the CASC Program, the responses to the spills were considered successful since the response and resulting removal of the spill from the creeks resulted in a reduced impact to the downstream receiving waters.

Background and details on the CASC Program are available in the *Countywide Area Spill Control (CASC) Program 2009-2010 Progress Report* which is an attachment to **Section 3** of the **2009-10 Unified PEA**.

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 stormdrain system. Illicit connections to the stormdrain system are prohibited under County ordinance. During the reporting period, the County took action against a business owner in the City of Placentia who had established an illicit connection to an Orange County Flood Control District (OCFCD) flood control channel. The illicit connection caused erosion to the channel as well as the contribution of pollutants.

Using the OCFCD water quality ordinance, an administrative compliance order was issued to the business owner and costs to repair the damage to the channel were recovered.

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



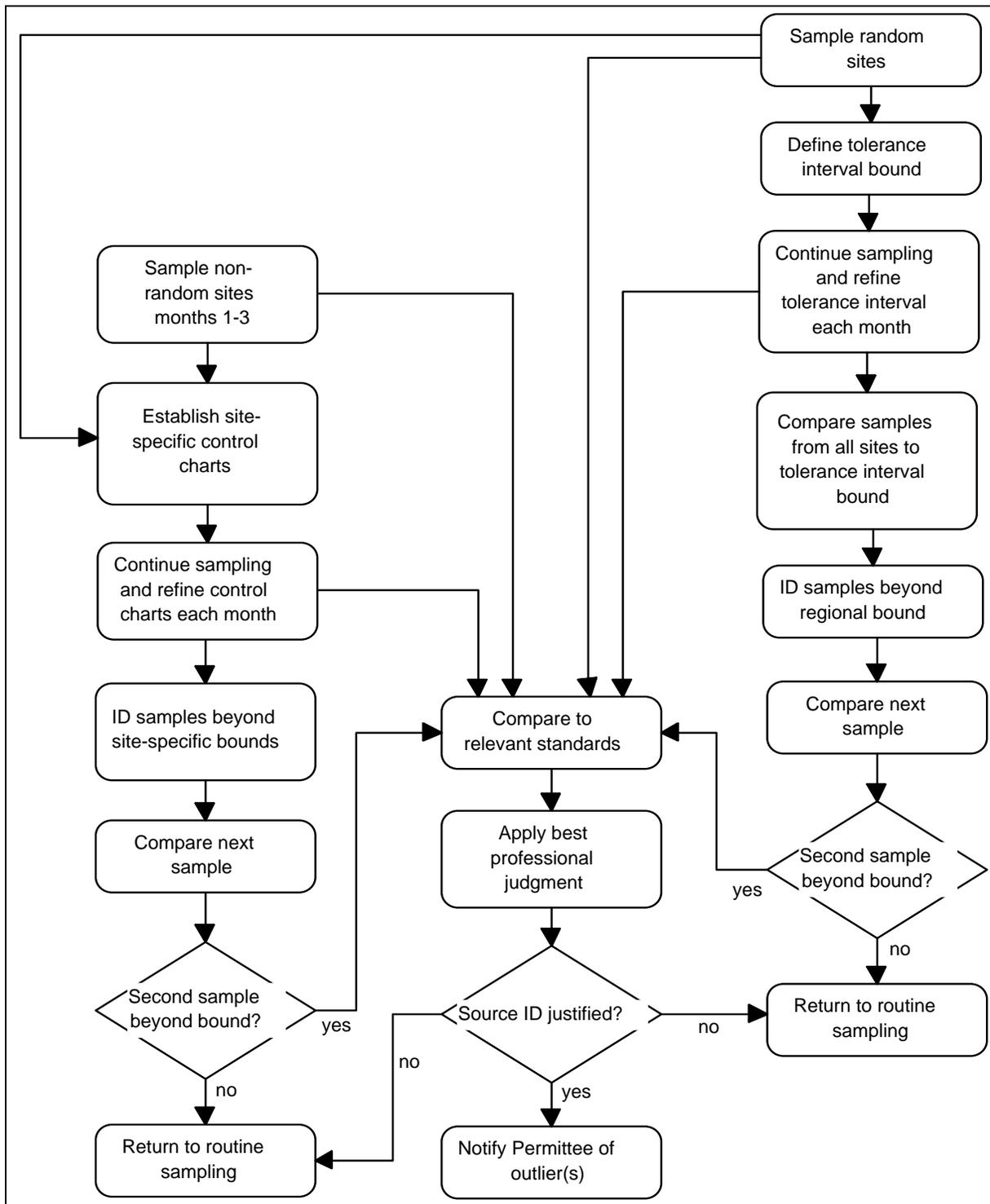
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Source investigations may be conducted when an illegal discharge or illicit connection is detected or suspected, and the source is not readily identifiable. The purpose of the investigation is to identify the source so that appropriate action can be 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.

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:



Dry Weather Source Investigation Flow-Chart



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 2009-10 Dry Weather Monitoring Results

Region	Drain Designation	Random or Targeted	Watershed	Location	Tolerance Interval Exceedances during Reporting Period		Source Investigation Conducted During Reporting Period?
					Constituent(s) and Number of Exceedances	Consecutive (If more than one)?	
San Diego	COL02P50	Random	San Juan Creek	Ladera Ranch	None	N/A	N/A
	COL02P55	Random			Ammonia, 1	No	Yes
					Bacteria (Total Coliform), 1	N/A	
					Nickel, 2	Yes	
					Cadmium, 1	N/A	
					MBAS, 1	N/A	
	COL05USB01	Targeted			Ammonia, 2	Yes	No, these sites monitored to evaluate Horno Basin Water Quality BMP
COL05DSB01	Targeted	Chlorine, 1	N/A				
		None	N/A				
Santa Ana	COC01S03	Targeted	Anaheim Bay/Huntington Harbor	Rossmoor	Turbidity, 2	Yes	No
					Total Suspended Solids, 1	N/A	
					Ammonia, 1	N/A	
					Bacteria (Enterococcus), 1	N/A	
					Pesticides (Malathion), 1	N/A	
	COC01S01@MT	Targeted			Oil & Grease, 1	N/A	No
	COF13@FH	Random			Total Organic Carbon, 1	N/A	
					COF07S01	Targeted	None
Nitrate, 1			N/A	Yes			
			Total Suspended Solids, 2		No		



					Pesticides (Malathion), 1	N/A	
					Chromium, 1	N/A	
					Copper, 2	Yes	
	COSACC@F01	Targeted		Newport Beach (Unincorp.)	None	N/A	Dry Site - Removed from program

San Diego Region Dry Weather Monitoring Source Investigation Discussion



As the table illustrates, one drain within the County’s jurisdiction in the San Diego Region (COL02P55) experienced consecutive exceedances of the tolerance interval for nickel constituent during the reporting period. A source investigation of this drainage area was previously conducted during the 2006-07 reporting period due to consecutive tolerance interval exceedances of ammonia, nickel and cadmium. The drainage area for this storm drain is a residential neighborhood in the unincorporated community of Ladera Ranch.

The study of natural sources from ambient geology being conducted by the County, discussed in detail in **Section C-3.4** of this PEA, includes the COL02P55 drainage area. It is believed that the source of the tolerance interval exceedances for metals (nickel, and previously cadmium) in dry weather runoff at this drain is being greatly influenced by natural geology. As this source investigation study continues and more is learned, the County will continue to report on progress.

Following notification of a surfactant exceedance (MBAS) at COL02P55 on May 25, 2010, a source investigation was immediately conducted and a prohibited non-stormwater discharge was identified from a restaurant within the drainage area. Enforcement action was taken against the restaurant and there have not been any exceedances for surfactants at that site since.

Two targeted dry weather sites (COL05USB01 & COL05DSB01) were added prior to the start of the 2010 dry weather season. These two sites are in the Ladera Ranch unincorporated community and are immediately upstream and downstream of the Horno Water Quality treatment basin which was built as a post-construction BMP. These sites were added to determine pollutant removal efficiencies of the basin during dry weather. Results from the first two sampling events are discussed in detail in **Section C-11** of this PEA.

Santa Ana Region Dry Weather Monitoring Source Investigation Discussion



Due to successful source investigations previously conducted within the COSACC@F01 drainage area, washwater discharges have been eliminated and as a result this targeted site in unincorporated Newport Beach continued to experience dry conditions throughout the 2009 dry weather monitoring season. As a result, the site was eliminated prior to the start of the 2010 dry weather season and was replaced with a targeted site in the unincorporated Rossmoor community, COC01S01@MT.



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A source investigation was conducted during the reporting period within the COF07S01 drainage area following notification of Bacteria exceedance on August 6, 2009. A resident was discovered to have illegally disposed of pet waste within the County’s right of way and enforcement action was taken by County staff. The resident removed the pet waste and properly disposed of it.

C-10.4.1 Multi-Jurisdictional Source Investigations



J01P28, Aliso Viejo

In response to continued high levels of bacteria at the outfall of J01P28 (96” stormdrain pipe in Aliso Viejo) which discharges directly to Aliso Creek, the County launched a multi-jurisdictional source investigation with the City of Aliso Viejo at the end of the 2009-10 reporting period. Details and results of this source investigation will be reported in the 2010-11 PEA.

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 for 2009-10.

2009-10 Summary of NPDES Inspection Committee Training Presentations



Training	Training Dates	Agency Providing Training	Trainer
New Santa Ana Region Inspection Requirements	August 13, 2009	OC Public Works	Christy Norris
NPDES Spill Response Scenarios II			Duc Nguyen
NPDES Restaurant Follow-up Inspections	November 19, 2009	OC Public Works	Duc Nguyen
		HCA/Environmental Health	Jeff Warren
Witness Interviewing Techniques		OCDA	Jim McConnell
SAR Industrial Site NOV Alerts	May 13, 2010	County of Orange	Duc Nguyen
Water Pollution Sampling Techniques			James Fortuna



Dry Weather Monitoring Program Refresher			Jennifer Weiland
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The County 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. Other training events include:

- CASQA Annual Conference
- StormCon
- California Hazardous Materials Investigators Association

In addition to Permittee sponsored training conducted during this reporting period, ID/IC training modules are available in **Section B-10** of **Appendix B** of the DAMP. These ID/IC training modules have continued to evolve 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 2009-10 reporting period is included in **Section C-6** of this report.

C-10.6 ID/IC Program Modifications

As the last step in the effectiveness assessment process, the County has evaluated the outcomes for this program element to determine if any modifications are necessary. The County feels (and the data supports) that this is an effective program element and no major modifications are planned.