



SECTION 9

CO-PERMITTEE IND AND IC/ID SUMMARY TABLES

9. CO-PERMITTEE IND AND IC/ID SUMMARY TABLES

INTRODUCTION

On September 7, 2001, the Industrial Inspection Ad Hoc Task Group (Industrial Inspection AHTG) recommended the adoption of Program-wide categories and enforcement actions developed by the Industrial Inspection AHTG. These categories and procedures are described in the *Continuous Improvement of Industrial Reporting Technical Memorandum* and *Continuous Improvement of Illicit Connection/Illegal Dumping Reporting Technical Memorandum*. The Management Committee approved both memoranda as the Program's strategy to implement IND and IC/ID reporting requirements (as required in Permit Provisions C.6.a.i. and ii). The memoranda were included as attachments within the Program's *FY 00-01 Annual Report* and submitted to the Water Board on September 17, 2001. Each Co-permittee began implementing these procedures immediately thereafter. Implementation of the enhanced reporting requirements by the Co-permittees has been very successful as shown in the past five Program annual reports.

In accordance with the Program's *FY 04-05 Work Plan* submitted to the Water Board on March 1, 2004, the Program committed to updating the Industrial/Commercial Discharger Control Program and Illicit Connection/Illegal Dumping Elimination Activities performance standards during FY 04-05. The updates were essentially administrative (e.g., incorporating enhanced reporting requirements and results of Co-permittee evaluations) and were directed at modifying the Program's model performance standards to reflect Management Committee direction and actual Co-permittee implementation. These administrative updates were provided to the Industrial Inspection AHTG for review during January 2005. The Management Committee approved final updated performance standards on February 17, 2005. Final updates were provided within Attachments 2-1 and 2-2 of the Program's *FY 05-06 Work Plan* (dated March 1, 2005) and hereby incorporated into the URMP.

IND and IC/ID summary tables, provided within Appendix H-1, were constructed by Program staff using data submitted from individual Co-permittees. The categories presented within the summary tables are consistent with the strategy provided in both performance dated February 17, 2005. In addition, summary tables represent incidents and/or inspections that occurred between July 1, 2007 and June 30, 2008. Pie charts and a bar graph showing pertinent information found within the IND and IC/ID summary tables are also included within this section. During FY 07-08, the Co-permittees conducted and/or responded to 10,033 IND inspections and IC/ID incidents. A summary of IND inspections and IC/ID incidents reported for individual Co-permittees is provided as Appendix H-2. The vast majority (95 percent) of IND inspections conducted during FY 07-08 resulted in no action or level 1 enforcement (verbal or written warnings). Appendix H-1 provides detailed inspection data relating to facility categories and enforcement actions. In addition, the two most common IC/ID incidents during FY 07-08 were miscellaneous incidents and vehicle & equipment leaking. Approximately 36 percent of the IC/ID incidents received verbal or written warnings. Other relevant IC/ID information relating to incident type, incident report source, incident source and enforcement action is also provided within Appendix H-1.

In accordance with the Water Board's letter, *Review of Program's Draft FY 2003-04 Work Plan* dated June 24, 2003, the Program informed the Co-permittees (see FY 02-03 Annual Report Preparation Guidance dated June 18, 2003) that each Co-permittee should independently

evaluate their individual IND and IC/ID inspection data and utilize the results of the analysis to set inspection priorities and gauge program effectiveness. Within the FY 02-03 Annual Report, as well as subsequent annual reports, Co-permittees have provided an effectiveness evaluation or analysis of their IND and ICID programs and/or data. This step was performed to address the Water Board's concerns regarding IND reporting procedures.

Since the implementation of the enhanced reporting requirements, Co-permittees have established inspection frequencies to reflect local conditions and characteristics, and adjusted them as needed based on inspection results. For this reason, inspection frequencies vary among Co-permittees depending on the types of business categories and potential threats to stormwater pollution occurring in each jurisdictional area. For example, during FY 07-08, the Cities of Santa Clara and Palo Alto shifted their inspection priorities to address specific industrial and commercial categories within their jurisdictional areas. The City of Santa Clara conducted the vast majority (75 %) of their IND inspections at automotive facilities (577 inspections) and machine shops (527 inspections). By comparison, during FY 06-07, the City of Santa Clara conducted 127 inspections at automotive facilities and 0 inspections at machine shops, and focused on other businesses. During FY 07-08, the City of Palo Alto focused their efforts on construction sites. A total of 439 IC/ID incidents involving construction sites were reported. During FY 08-09, inspection priorities may change at both cities due to limited resources and the need to determine the compliance status of other industrial and commercial categories. This inspection approach is similar to that of other cities within the Program's jurisdiction.