

Chapter 2: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

BMP #ID-1: Environmental Compliance Inspectors Conduct Site Inspections At Regulated Businesses

Currently, the City's Environmental Compliance Division conducts site inspections at approximately 3 categorical industrial facilities, 13 "significant users," 7 dry cleaners, 325 food service facilities, and 110 vehicle service facilities. Regular site inspections at these facilities are conducted a minimum of once per year, or more frequently if a problem or violation is detected.

Site inspections also typically include an educational aspect in order to inform or remind the facility owner or manager about the new storm water regulations and how to prevent discharges to the storm drain system. The Environmental Compliance Inspectors distribute BMPs when they conduct site inspections and discuss any facility issues or practices that may have the potential to discharge pollutants to the storm drain system. All site inspections are documented and entered into the Environmental Compliance database.

Measurable Goals:

1. Inspect 100% permitted industrial facilities
2. Inspect 100% vehicle service facilities
3. Inspect 100% food service facilities

Year 1 Summary:

1. All permitted Industrial Facilities were inspected by an Environmental Compliance Inspector during the permit year. At one site, the Environmental Compliance Division secured the disconnection of an illegal storm water diversion into the sanitary sewer by issuing a Notice of Violation.
2. There are 45 Vehicle Service Facilities (VSFs) in the City and each one was inspected by an Environmental Compliance Inspector once during the permit year. Additional inspections were conducted at some sites if follow up was needed. Environmental Compliance maintained compliance with both the Storm Water and Sewer Use ordinances at most facilities, and improved compliance at others.
3. There are 275 Food Service Facilities (FSFs) in the City and each one was inspected by an Environmental Compliance Inspector once during the permit year. Additional inspections were conducted at some sites if follow up was needed. Most facilities were found to be in compliance with the Storm Water and Sewer Use ordinances although the Environmental Compliance Division did issue Warning Letters (<10) as needed to maintain compliance.

Effectiveness: All goals met, very effective
Planned Year 2 Activities: continue

BMP # ID-2: Conduct Spill and Illegal Discharge Response

The City responds to all reports and complaints of spills and illegal discharges to the storm drain system as soon as possible. Once a complaint is received, an Environmental Compliance Inspector visits the site as soon as possible to assess the complaint and determine if it is valid. If valid and the discharge is still occurring, the discharger is verbally instructed to cease immediately and cleanup if applicable. Environmental Compliance staff may also contact the Wastewater Mains Division or County Environmental Health if necessary to assist with cleanup.

Field inspections and investigations are conducted as a result of the following:

1. Complaints received from the general public
2. Staff observations of suspicious activities
3. Line blockages, leaks, or breaks
4. Physical indications that a spill or illegal discharge has occurred

The Environmental Compliance Inspectors also strive to educate the resident, contractor, or business responsible for the illegal discharge in order to prevent its reoccurrence. Written notices are given as needed.

Measurable Goals:

1. Respond to 100% complaints and reports of illegal discharges

Year 1 Summary: The Environmental Compliance (EC) Division receives complaints from the general public, business owners, and other City staff including PW Engineering, PW Wastewater Mains, Park & Recreation, and the Redevelopment Agency regarding illegal discharges to the storm drain system. Once a complaint is received, the EC Inspectors visit site as soon as possible to assess the complaint & determine if valid. If valid and discharge is still occurring, the discharger is verbally instructed to cease immediately. Written notices are given as needed. Staff conducted successful education and meetings with dischargers of paint/color and other nuisance objects into the storm drains.

During the permit year, approximately 20 illegal discharge complaints were received. The most common complaints were regarding the discharge of soapy water, paint, and pressure washing wastewater to the street or storm drain system. In one incident, there was a suspected illegal discharge to Antonelli Pond because truck tracks were found in the mud and there was coloration found in Moore Creek. However, staff was unable to confirm an illegal discharge by a responsible party. Environmental Compliance coordinated with the Parks and Recreation Department on this matter, and is currently working with the property's Land Trust in order get "No Dumping" signs posted with warnings of potential fines for illegal discharges.

Effectiveness: goal met

Proposed Modifications: none

Planned Year 2 Activities: continue

BMP #ID-3: Conduct Storm Drain Outfall Monitoring for Bacterial Indicators at three locations along West Cliff Drive (at Auburn Street, Almar Avenue, and Woodrow Avenue)

The City monitors several storm drain outfalls along West Cliff Drive (at Auburn Street, Almar Avenue, and Woodrow Avenue), which discharge directly into Monterey Bay, for coliform and enterococcus bacteria on a quarterly basis. In addition, these stations are routinely monitored as part of the sanitary survey for evaluating single sample maximum exceedances of the bacteria levels at the 30 foot contour depth at near shore stations. This is an effective method to determine if an illegal cross-connection from a sanitary sewer lateral exists.

Measurable Goals:

1. Quarterly monitoring

Year 1 Summary: Quarterly monitoring was conducted at all three sites and the monitoring was actually increased to a monthly frequency at all three sites during the year. The Environmental Compliance Division also developed data for coordination with the AB 411 beach monitoring data at all three locations on a monthly basis.

Effectiveness: goal met & exceeded.

Proposed Modifications: none

Planned Year 2 Activities: continue

BMP #ID-4: Conduct Television (TV) Camera Inspections of Storm Drain Lines

Each year, portions of the City's approximately 50-mile storm water system are inspected with a TV camera for specific purposes, such as when road paving is planned or there is a suspected problem in the pipes. In these cases, the underground photos are also scrutinized for the presence of illegal connections to the storm drain system. In addition, TV camera inspections maybe used on a "case by case" basis such as when an illegal connection is suspected.

(This BMP is also listed in Chapter 1).

Measurable Goals:

1. TV or visual inspection of inside of an average of 1,000 feet of pipeline each year of 5 year period

Year 1 Summary: This year, the City conducted a TV inspection of 13,732 feet of storm drain pipeline.

Effectiveness: goal met & exceeded

Proposed Modifications: none

Planned Year 2 Activities: continue

BMP #ID-5: Sponsorship of First Flush

“First Flush” is a region-wide volunteer monitoring event conducted during the first storm of the rainy season. The Monterey Bay Sanctuary Citizen Watershed Monitoring Network coordinates First Flush in cooperation with the Coastal Watershed Council. First Flush is an annual event that is conducted simultaneously at participating cities throughout the Monterey Bay area. Resident volunteers collect storm water samples, which are then sent to a laboratory for analyses. The volunteers receive training in sample collection prior to the First Flush event. Sample results could potentially alert the City to illicit discharges or illegal connections upstream of the sampling sites. First Flush tends to receive much publicity since the findings of the annual event are released to the news media and are generally published by all the major newspapers.

(This BMP is also listed in Chapter 4)

Measurable Goals:

1. 15 volunteers conducting the monitoring
2. Annual report prepared by the Monterey Bay Sanctuary Citizen Watershed Monitoring Network.

Year 1 Summary:

1. CWC trained 14 volunteers prior to the event. During the first flush storm which occurred at night, only eleven volunteers participated in the actual monitoring as three people were unavailable that night. The First Flush event occurred on October 13, 2009.
2. This year, the annual First Flush report was prepared by Coastal Watershed Council (CWC) and sent to the City once completed. The report is no longer prepared by MBSCWMN. A copy of the Annual Report is available upon request.

Effectiveness: Goal #1 partially met and modification requested. Goal #2 met and modification requested.

Proposed Modifications:

1. The City requests modification of this goal for several reasons. Per discussion with the CWC who organizes the event and arranges the sites’ volunteer teams, the optimum team size is 3-4 volunteers/site. Since the City now has 3 sites (a fourth site was dropped in 2009 due to safety concerns), a total of 9-12 volunteers assigned to City sites is preferable. Also, some of the trained volunteers may be unavailable for the actual first flush storm since not a scheduled event and often occurs at night. Thus, the City requests that this goal be changed to “At least 9 volunteers participating.”
2. The Monterey Bay Sanctuary Citizen Watershed Monitoring Network no longer produces the final reports. The Coastal Watershed Council is currently responsible for preparing the final report. Thus, the City requests that this measurable goal be modified to “Annual report of sample results prepared by the Coastal Watershed Council.”

Planned Year 2 Activities: continue

BMP #ID-6: Develop and Implement A Public Storm Water Hotline Number

Scheduled for Permit Years 3 and 4

Measurable Goals:

1. Plan for hotline number (Year 3)
2. Hotline number operational (Year 4)

Year 1 Summary: NA-Scheduled for Permit years 3 and 4.

However, an in-house telephone number to report illegal discharges or dumping is currently included on all pertinent BMP Brochures and Outreach Materials.

Effectiveness: NA

Proposed Modifications: NA

Planned Year 2 Activities: NA

BMP #ID-7: Implement Corrective Measures and Enforcement Procedures in Accordance with the Storm Water Ordinance

The various City departments or divisions receive complaints from the public regarding illegal discharges or may notice these discharges while working in the field. All divisions either respond as soon as possible or forward the complaints as appropriate to the Environmental Compliance Division, Wastewater Mains, or Planning/Building depending upon the type of violation. The Environmental Compliance Division typically issues the follow up corrective measures and enforcement actions for discharges to the storm drain system in accordance with the Storm Water Ordinance (except for those related to construction projects which may also be followed up by the Planning Department as detailed in Chapter 5-Construction).

Measurable Goals:

Eliminate 100% of identified illicit discharges

Year 1 Summary: This year, the Environmental Compliance Division issued one Warning Letter to a residential complex, near Ocean Street and Broadway. The Warning Letter included a directive to disconnect an illegal connection to the storm drain system, which was complied with immediately. Additional Warning Letters were issued by Environmental Compliance for construction related discharges and these are discussed in Chapter 5.

Effectiveness: goal met

Proposed Modifications: none

Planned Year 2 Activities: continue