

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, 275 food service facilities, and 80 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 4 Summary:

1. All 21 permitted Industrial Facilities were inspected by an Environmental Compliance Inspector during the permit year. One (1) Notice of Violation (NOV) was issued to a Significant Industrial User (SIU).
2. There are 80 Vehicle Service Facilities (VSFs) in the City and each one was inspected by an Environmental Compliance Inspector once or more (if needed) 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. Two Notices of Violation (NOV) and four Warning Letters were issued to Food Service Facilities this year.

Effectiveness: All goals met, very effective

Proposed Modifications: Please see attached City of Santa Cruz Guidance Document

Planned FY 2013-2014 Activities: Please see attached City of Santa Cruz Guidance Document

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 4 Summary:

a. 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 46 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. As needed, Environmental Compliance staff coordinates with PW storm water staff, the Parks and Recreation Department, Planning Department, and Redevelopment to follow up on or get illegal discharges resolved.

b. The Wastewater Mains Division also receives and responds to calls regarding sanitary sewer overflows. From June 30, 2012 to June 30, 2013, the sanitary sewer overflow calls received were: 3 sewer main and 5 private lateral spills. 100% of these calls were responded to by Wastewater Mains and the spills were cleaned up/pumped out using the City Vactor Truck.

Effectiveness: goal met

Proposed Modifications: Please see attached City of Santa Cruz Guidance Document
Planned FY 2013-2014 Activities: Please see attached City of Santa Cruz Guidance Document

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 4 Summary: Quarterly monitoring was conducted at all three sites and the goal was exceeded as monitoring was 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: Please see attached City of Santa Cruz Guidance Document
Planned FY 2013-2014 Activities: Please see attached City of Santa Cruz Guidance Document

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 may be 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 4 Summary: This year, the City conducted a TV inspection of 2,000 feet of storm drain pipeline. In Permit Years 1, 2 and 3, the City conducted a TV inspection of 13,732 feet, 209 feet, and 260 feet respectively of storm drain pipeline.

Effectiveness: goal met & exceeded

Proposed Modifications: Please see attached City of Santa Cruz Guidance Document
Planned FY 2013-2014 Activities: Please see attached City of Santa Cruz Guidance Document

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 4 Summary: Please see Chapter 4, BMP #PE-13

Effectiveness: goal met

Proposed Modifications: Please see attached City of Santa Cruz Guidance Document

Planned FY 2013-2014 Activities: Please see attached City of Santa Cruz Guidance Document

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 4 Summary: During the year, Staff submitted a request to RWQCB staff re modifying this BMP. During the previous year(s), Staff had researched the possibility of implementing a regional storm water hotline number with neighboring municipalities however this did not work out. Thus, without the benefit of one region-wide hotline number, the City prefers to continue using the current telephone contact numbers which printed on our brochures, etc. 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: Modification requested re continuing to use our current telephone contact numbers as a region-wide hotline number was infeasible.

Planned Year 5 Activities: See above and please see attached City Guidance Document

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 4 Summary: Public Works storm water staff received seven complaints regarding illegal discharges or dumping. Six of the seven complaints were forwarded to the PW Environmental Compliance Inspectors for follow-up. One was followed up by storm water staff and determined to be unfounded. There was an additional illegal discharge incident discovered by PW storm water staff and this was forwarded to EC staff as well for follow up. Thus, Public Works Engineering (includes storm water staff) did not issue any corrective or enforcement actions.

A Warning Letter and a Correction Notice were issued by EC and Building respectively for construction related discharges, and these are discussed in Chapter 5. In addition, the Environmental Compliance (EC) Division currently has one site under investigation although an illicit connection has not yet been detected.

Effectiveness: goal met

Proposed Modifications: none. Please see attached City of Santa Cruz Guidance Document

Planned FY 2013-2014 Activities: Please see attached City of Santa Cruz Guidance Document