

Jurisdictional Urban Runoff Management Plan

Annual Report Fiscal Year 2011-2012

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5.0 INDUSTRIAL AND COMMERCIAL COMPONENT

5.1 Introduction

JURMP Section 7.0 establishes a programmatic framework for conducting activities to minimize the impact of discharges from industrial and commercial sites and sources on receiving waters in compliance with *Permit Section D.3.b*. This annual report section describes the programs and activities conducted by the County to implement its Industrial and Commercial Component during Fiscal Year (FY) 2011-12. **Section 5.2** describes and assesses the implementation of programs and activities directed at industrial and stationary commercial sources, and **Section 5.3** addresses mobile businesses.

5.2 Stationary Industrial and Commercial Sites and Sources Element

5.2.1 Background

JURMP Section 7.2 describes the programs, activities, and strategies to be conducted for stationary industrial and commercial sources in the unincorporated areas of the County. During this reporting period, two departments implemented this element: the Department of Agriculture, Weights and Measures (AWM) provided oversight of agricultural and related businesses, and the Department of Public Works (DPW) addressed other stationary commercial and industrial businesses in the County inventory.

5.2.2 Source Characterization

In accordance with *Permit Section D.3.b(1)*, the County updated its inventories of Industrial and Stationary Commercial Facilities subsequent to the completion of FY 2011-12. **Table 5.1** summarizes the major changes made during this update. These updated inventories serve as a basis for the implementation of program activities during FY 2011-12. They are provided in their entirety in **Attachment 5.1** and are summarized by watershed and source type in **Table 5.2**.

Threat-to-water-quality priorities for all DPW facilities in the inventory were assigned in accordance with the criteria and process described in *JURMP Section 7.2.2.1*.

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5.2.3 Best Management Practice Requirements

JURMP Sections 7.2.3, 7.3.3 and *Attachments 7.2, 7.3*, as well as *WPO Sections 67.801 - 67.806, 67.808, and 67.810*, identify County BMP requirements for industrial and commercial sources. These documents are reviewed for necessary updates or modifications during each fiscal year. Modifications planned as a result of these reviews are listed at the end of this section.

5.2.4 Implementation Results for Industrial Source Management Programs

The County's implementation and assessment strategy for industrial sources is described in *JURMP Section 7.2.4*. **Figure 5.1** also provides an overview of the major elements of this strategy as it was implemented during FY 2011-12. Additional documentation, analysis, and discussion are provided as applicable below.

Table 5.1 – Summary of Changes to Stationary Industrial and Commercial Source Inventories

Department / Program	Date of Update	Description of Changes
Industrial Sources		
Department of Public Works (DPW)	07-15-12	The industrial inventory decreased by 5 facilities.
Commercial Sources		
Department of Public Works (DPW)	07-15-12	The commercial inventory decreased by 73 facilities.
Department of Agriculture, Weights & Measures (AWM)	06-30-12	The commercial agricultural inventory decreased by 57 facilities.

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Table 5.2 – Summary of Stationary Industrial and Commercial Sources Inventory

Business Type / Sector	No. of Facilities	Change from Previous	TTWQ Priority			Watershed									
			High	Medium	Low	Santa Margarita (902)	San Luis Rey (903)	Carlsbad (904)	San Dieguito (905)	Peñasquitos (906)	San Diego River (907)	Pueblo (908)	Sweetwater (909)	Otay (910)	Tijuana (911)
A. Industrial Sources															
<u>Sector 14</u> – Mining/Quarrying of Non-Metallic Minerals, Except Fuels	17	-2	17	0	0	0	4	1	2	0	7	0	3	0	0
<u>Sectors 2434-2700</u> - Wood and Paper Products	11	-9	2	1	8	2	0	1	1	0	6	0	1	0	0
<u>Sector 32</u> – Stone, Clay, Glass, & Concrete Products	22	-2	11	10	1	2	0	4	1	0	12	0	3	0	0
<u>Sector 34</u> – Fabricated Metal Products except Machinery & Transportation Equipment	45	-2	11	18	16	6	2	3	4	0	21	0	9	0	0
<u>Sector 35</u> – Industrial and Commercial Machinery Equipment	8	0	1	2	5	1	0	1	0	0	3	0	3	0	0

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<u>Sector 37</u> – Transportation Equipment, incl. Boat Building & Repair	9	0	2	4	3	0	0	1	2	0	4	0	1	1	0
<u>Sector 41</u> – Local Passenger Transportation, NEC	9	-1	5	4	0	0	3	0	2	0	1	0	2	0	1
<u>Sector 42</u> – Motor Freight Transportation and Warehousing	14	-1	9	5	0	0	0	0	2	0	7	0	5	0	0
<u>Sector 50</u> – Wholesale trade (Auto Dismantlers)	5	0	4	1	0	0	0	0	1	0	3	0	1	0	0
<u>Other Industrial Sectors</u>	41	+12	13	13	15	7	1	4	9	0	13	0	7	0	0
<u>Total Industrial</u>	181	-5	75	58	48	18	10	15	24	0	77	0	35	1	1

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Table 5.2 – Summary of Stationary Industrial and Commercial Sources Inventory

Business Type / Sector	No. of Facilities	Change from Previous	TTWQ Priority			Watershed									
			High	Medium	Low	Santa Margarita (902)	San Luis Rey (903)	Carlsbad (904)	San Dieguito (905)	Peñasquitos (906)	San Diego River (907)	Pueblo (908)	Sweetwater (909)	Otay (910)	Tijuana (911)
B. Stationary Commercial Sources															
Department of Public Works (DPW)															
Automobile Repair, Maintenance, Fueling, or Cleaning	265	-15	25	175	65	28	11	25	19	0	101	0	80	1	0
Airplane and Boat Repair, Maintenance, Fueling, and Cleaning	6	0	0	5	1	0	3	0	1	0	0	0	2	0	0
Automobile and Other Vehicle Body Repair or Painting	50	-8	3	35	12	1	0	2	10	0	15	0	22	0	0
Equipment Repair, Maintenance, Fueling, and Cleaning	43	-5	15	24	4	4	6	3	7	0	19	0	4	0	0
Eating and Drinking Establishments	544	-13	31	226	287	45	49	21	91	0	147	0	175	3	13

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			High	Medium	Low	Santa Margarita (902)	San Luis Rey (903)	Carlsbad (904)	San Dieguito (905)	Peñasquitos (906)	San Diego River (907)	Pueblo (908)	Sweetwater (909)	Otay (910)	Tijuana (911)
Paintball Fields & Other Recreational Sites	2	0	2	0	0	0	0	1	1	0	0	0	0	0	0
Parking Lots and Storage	17	-1	8	6	3	0	1	0	2	0	6	0	3	1	4
Retail and Wholesale Fueling	96	-2	4	55	37	7	8	1	14	0	36	0	26	1	3
Other – Miscellaneous	101	-15	8	52	41	6	7	15	5	0	47	0	20	0	1
Animal Facilities (kennels and equine)	173	-9	46	109	18	8	38	21	24	1	45	0	27	4	5
Building Material Retailers and Storage	23	-1	1	14	8	2	6	1	3	0	8	0	1	0	2
Tire Shop	24	-2	1	11	12	0	0	3	4	0	8	0	9	0	0
Mobile Operators-Head Quarters	95	-2	18	54	23	0	6	6	4	0	58	0	21	0	0
Total DPW Stationary Commercial Sources	1,439	-73	162	766	511	101	135	99	185	1	490	0	390	10	28

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Table 5.2 – Summary of Stationary Industrial and Commercial Sources Inventory

Business Type / Sector	No. of Facilities	Change from Previous	TTWQ Priority			Watershed									
			High	Medium	Low	Santa Margarita (902)	San Luis Rey (903)	Carlsbad (904)	San Dieguito (905)	Peñasquitos (906)	San Diego River (907)	Pueblo (908)	Sweetwater (909)	Otay (910)	Tijuana (911)
Department of Agriculture, Weights & Measures (AWM)															
Pest Control Services (headquarters)	44	-5	4	18	22	3	18	7	1	0	6	0	9	0	0
Nurseries and Greenhouses	401	-52	69	223	109	51	189	103	24	0	18	0	14	1	1
Golf Courses	27	0	27	0	0	0	12	5	4	0	2	0	4	0	0
Cemeteries	9	0	3	1	5	1	1	0	1	0	2	1	3	0	0
Other Agriculture Businesses	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0
Total AWM Stationary Commercial Sources	482	-57	104	242	136	55	221	115	30	0	28	1	30	1	1

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Table 5.2 – Summary of Stationary Industrial and Commercial Sources Inventory

Business Type / Sector	No. of Facilities	Change from Previous	TTWQ Priority			Watershed									
			High	Medium	Low	Santa Margarita (902)	San Luis Rey (903)	Carlsbad (904)	San Dieguito (905)	Peñasquitos (906)	San Diego River (907)	Pueblo (908)	Sweetwater (909)	Otay (910)	Tijuana (911)
C. Summary Statistics															
Total Industrial Sources	181	-5	75	58	48	18	10	15	24	0	77	0	35	1	1
DPW Stationary Commercial Sources	1,439	-73	162	766	511	101	135	99	185	1	490	0	390	10	28
AWM Stationary Commercial Sources	482	-57	104	242	136	55	221	115	30	0	28	1	30	1	1
Total Stationary Commercial Sources	1,921	-130	266	1,008	647	156	356	214	215	1	518	1	420	11	29
Total Stationary Sources (Commercial + Industrial)	2,102	-135	341	1,066	695	174	366	229	239	1	595	1	455	12	30

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DPW Industrial Businesses Sub-element			
Program Implementation  - DPW Watershed Protection	Target Audiences  - Industrial Business Owners, Operators, & Employees		Sources  - Industrial Businesses (see inventory, Table 5.2)
OUTCOME LEVEL 1	OUTCOME LEVEL 2	OUTCOME LEVEL 3	OUTCOME LEVEL 4
Stormwater Program Activities	Knowledge & Awareness	Behaviors	Source Reductions
<u>Program Administration</u> <input checked="" type="checkbox"/> Program reviews & updates <input checked="" type="checkbox"/> Source inventory updates <input checked="" type="checkbox"/> Staff training <u>Facilitation Activities</u> <input checked="" type="checkbox"/> Education & outreach <input checked="" type="checkbox"/> Enforcement / return to compliance <u>Feedback Activities</u> <input checked="" type="checkbox"/> Routine site inspections <input checked="" type="checkbox"/> Complaint investigations <input checked="" type="checkbox"/> Special investigations (See Table 5.3 for Level 1 Results)	<input checked="" type="checkbox"/> Not Targeted or Assessed <input checked="" type="checkbox"/> Administrative & procedural behaviors <input checked="" type="checkbox"/> Illicit discharge control <input checked="" type="checkbox"/> BMP implementation <input checked="" type="checkbox"/> Regulatory compliance (See Table 5.8 for Level 3 Results)		<input checked="" type="checkbox"/> Not Targeted or Assessed

Figure 5.1 – FY 2011-12 Implementation and Assessment Strategy for the DPW Industrial Sub-element

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Table 5.3 – Program Implementation and Assessment Results for the DPW Industrial Sub-element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
<u>Program Administration</u>		A variety of administrative activities are necessary to support the operation and management of this element of the County's stormwater program. These are described below.			
☑ Program reviews & updates		Throughout each fiscal year, County staff provides a thorough review of all elements of its JURMP and ancillary program materials to determine whether modifications are necessary. See Table 5.27 for an updated list and schedule of modifications.			
<u>Completion of identified program modifications</u>		The status of program modifications identified in last year's JURMP Annual Report is described below.			
5.2.4.1	Not targeted	R _I = None	No additional assessment currently needed	Not targeted	No substantial modifications were identified during the review of the JURMP in FY 2011-12.
<u>Identification of additional needed program modifications</u>		An annual review of JURMP Section 7.2 and other ancillary program documentation was completed. A comprehensive review was performed during the development of this JURMP Annual Report. No additional modifications are necessary at this time.			
5.2.4.2	Complete the integration of inventory and inspection database into KIVA (T = completion)	R _{I+A} = Preparation for data transfer (on-going)	Integration of inventory and inspection database into Accela.		During FY 2011-12, DPW IT staff developed the working framework for Accela, a countywide shared database designed to replace KIVA. The "go-live" implementation is expected for Quarter 2 of FY 2012-13, with the DPW KIVA inventory and inspection database being transferred to Accela.
☑ Source inventory updates		In accordance with Permit Section D.3.b.(1) , source inventories are reviewed and updated at least annually to ensure that they are current and complete, and that threat-to-water-quality prioritizations are correct. The County updated its inventory of industrial facilities on 07-15-12. This update is described in Table 5.2 and presented in Attachment 5.1.1 .			
<u>Facilitation Activities</u>		Facilitation activities are those which assist, encourage, or require changes in the knowledge or behaviors of the individuals and populations to which program activities are directed. Facilitation results for this element are described below.			

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Table 5.3 – Program Implementation and Assessment Results for the DPW Industrial Sub-element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ☒	Next Fiscal Year Targets ⊙	Explanation 📄
☑ Staff training		See Section 4.14.			
☑ Education & outreach		Various outreach methods can be used to bring about changes in the knowledge or behaviors of industrial operators. Outreach to this target audience is embedded in the inspection process and can be conducted independently through other means. Results are described below.			
5.2.4.3	Provide education to operators during all industrial inspections (T = 87 inspections)	R _I = Education provided during 87 inspections	R _A = 100 % complete	Provide education to operators during all industrial inspections	<p>During industrial inspections, General Business and Pollution Prevention fact sheets are distributed to operators, as needed. The inspector and operator discuss the site-specific activities and then identify associated BMPs on the fact sheets. The operator then uses the sheet as a guide for conducting employee stormwater training. The operator is instructed to keep the fact sheet with the training records, spill response plan, and other stormwater-related materials. On subsequent inspections, the inspector asks for the fact sheet or replaces it on request. The operator and inspector then discuss existing BMP effectiveness and any changes in operations, including new BMPs implemented.</p> <p>Inspectors also provide guidance materials excerpted from the General Industrial Permit guidelines and CASQA BMP Handbooks.</p> <p>Facilities directly adjacent to or within ESAs or classified as CWA 303(d) sites are required to provide documentation of awareness training about the sensitive locations and type of waste generated by the site.</p> <p>In FY 2012-13, the County will continue its one-to-one outreach as part of the inspection process</p>

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Table 5.3 – Program Implementation and Assessment Results for the DPW Industrial Sub-element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.4.4	Notify facility operators of BMP requirements (T = 7 operators)	R _{I+A} = notifications completed for 7 facilities	R _A = 100% complete	Notify new facility operators of BMP requirements specific to the facility	In FY 2011-12, the County notified all industrial operators of the BMP requirements during inspections, including those 7 sites added to the inventory. (BMP notification to all facilities had been completed during the first three years of the Permit cycle.) This step is necessary because the County does not issue business licenses and thus learns of new facilities during field visits or complaint investigations. The County will continue to notify new operators in FY 2012-13.
☑ Enforcement / return to compliance		Enforcement actions are used to require a return to compliance with applicable legal requirements. Each year, the County sets a target of correcting all instances of non-compliance observed during routine inspections. Success is measured as verification of a return to compliance or that a facility was working within established schedules to return to compliance.			

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Table 5.3 – Program Implementation and Assessment Results for the DPW Industrial Sub-element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ☒	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.4.5	Correct all instances of non-compliance observed during site inspections (T = 29 facilities)	R _I = 29 facilities returned or on schedule to return to compliance	R _A = 100% complete	Correct all instances of non-compliance observed during site inspections	<p>As shown in Table 5.6, non-compliance was observed during routine inspections in 33.3% (29 of 87) of inspected facilities; 28 sites returned to compliance, and the remaining site is on schedule to return to compliance. Table 5.6 also provides summary information on enforcement actions associated with industrial facility site inspections, including the number of specific facilities with violations, types of enforcement actions taken, and compliance status. In all, 66.7% (58 of 87) of inspected facilities did not have any violations at the time of inspection. The non-compliant facilities returned to compliance by submitting a Corrective Action Form or through re-inspection in 31.0% and 58.6% of the cases, respectively. County inspectors typically require Corrective Action forms and supporting documentation for minor BMP implementation violations (e.g., dumpster lid not closed). The one remaining facility has been making sufficient progress in a stepped approach, using temporary and long-term BMPs. County staff will continue to monitor the progress, and compliance is expected in late 2012.</p> <p>Industrial Sectors “Other” and 2434-2700 showed higher than expected rates (66.7% and 75%, respectively) of non-compliance. County inspectors will re-focus efforts with these operators to reverse this trend in these sectors.</p> <p>Additional site-specific compliance data for individual facilities, including information on any necessary follow-up actions taken, can be found in Attachment 5.3.1.</p>
<p>Feedback Activities</p> <p>Feedback Activities are conducted to determine whether and to what degree targeted changes are occurring in targeted staff. The implementation of feedback activities for this element is described below. Results of feedback obtained are provided in Table 5.8.</p>					

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Table 5.3 – Program Implementation and Assessment Results for the DPW Industrial Sub-element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
☑ Routine site inspections		<p>Site inspections are used to verify compliance and to determine whether additional actions are required to correct non-compliance. Inspections typically consist of observations, record reviews, and sampling as needed. Site inspection results are described below.</p>			
5.2.4.6	Inspect all high priority industrial facilities (T = 75 facilities)	R _I = 75 high priority facilities inspected	R _A = 100% complete	Inspect all high priority industrial facilities	<p>Permit Section D.3.b.(3)(b) requires that the County inspect 100% of high priority and 25% of all stationary industrial sources. Assessment results were calculated using the total number of facilities in the industrial inventory at the beginning of FY 2011-12 (i.e., July 1, 2011, in which there were 75 high priority sites out of a total of 181 sites).</p> <p>An overall completion rate of 100% was observed during FY 2011-12. Summarized inspection results, including the total number of inventoried sources and inspections conducted for each business type and priority category, are presented in Table 5.5. Detailed inspection results are also presented by facility in Attachment 5.3.1.</p>
5.2.4.7	Inspect 25% of the total industrial inventory (T = 45 facilities)	R _I = 87 facilities inspected	R _A > 100% complete	Inspect 25% of the total industrial inventory	
5.2.4.8	Identify potential non-filers under the statewide General Industrial Permit (T = confirmation)	R _{I+A} = 21 Potential non-filers identified (confirmed)		Identify potential non-filers under the statewide General Industrial Permit	<p>During all industrial inspections, County staff confirms the site's SIC code, as reported by the operator and as shown by the primary industrial activity. If the inspector determines that the site's SIC code makes it subject to the Industrial General Permit, the operator will be instructed to provide evidence of the following industrial status: (1) a Notice of Intent (NOI) Letter / Waste Discharge Identification Number (WDID) indicating coverage under the General Industrial Permit, or (2) a current, self-certifying Notice of Non-Applicability (NoNA) declaring that the facility is exempt from coverage under the General Industrial Permit. During inspection, inspectors review any provided documentation and site to confirm that the facility meets the NoNA criteria. Questionable NoNA sites are referred to the RWQCB for a final determination. Table 5.7 provides a list of potential non-filers identified during FY 2011-12.</p>

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Table 5.3 – Program Implementation and Assessment Results for the DPW Industrial Sub-element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
☑ Complaint investigations		Complaint investigations are similar to site inspections except that they are in response to reports of potential violations (e.g., through the Regional Hotline or staff referrals).			
5.2.4.9	Investigate all justified industrial complaints received (T = 3 complaint cases)	R _I = 3 justified complaints investigated	R _A = 100% complete	Investigate all justified industrial complaints received	All justified industrial complaints were investigated and resolved during FY 2011-2012.
☑ Special investigations		No special investigations were conducted in FY 2011-12.			

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Table 5.4 – Detailed Results of Outreach and Notification Activities for DPW Industrial Target Audiences

Date	Specific Audience	Audience Size	Location	Description
Presentations, Workshops, and Trainings				
FY 2011-12	----	----	----	Although not specifically targeted, some industrial operators attended the trainings/workshops listed in Table 5.11 under “Small Businesses.”
Outreach During Inspections				
FY 2011-12	Industrial operators	87	Multiple	Education was provided directly to operators during 87 inspections, including all high priority sites in the inventory. The one-to-one education process is described in section 5.2.4.4.
Combined Outreach Totals				

Totals

87

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Table 5.5 – Industrial Facility Inspections by Business Type and TTWQ Priority

Business Type	High Priority			Medium Priority			Low Priority			All Priorities		
	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected
Sector 14 – Mining/Quarrying of Non-Metallic Minerals, Except Fuels	17	18	100%	0	0	0.0%	0	0	0.0%	17	18	100%
Sector 2434-2700 - Wood Cabinets and Wood/Paper Products	2	3	100%	1	1	100%	8	0	0.0%	11	4	36.4%
Sector 32 – Stone, Clay, Glass, & Concrete Products	11	12	100%	10	1	10.0%	1	0	0.0%	22	13	59.1%
Sector 34 – Fabricated Metal Products except Machinery & Transportation Equipment	11	12	100%	18	1	5.5%	16	0	0.0%	45	13	28.9%
Sector 35 – Industrial and Commercial Machinery Equipment	1	1	100%	2	1	50.0%	5	0	0.0%	8	2	25.0%
Sector 37 – Transportation Equipment, Incl. Boat Building & Repair	2	2	100%	4	0	0.0%	3	0	0.0%	9	2	22.2%
Sector 41 – Local Passenger Transportation, NEC	5	5	100%	4	0	0.0%	0	0	0.0%	9	5	55.5%
Sector 42 – Motor Freight Transportation and Warehousing	9	9	100%	5	1	20.0%	0	0	0.0%	14	10	71.4%

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Table 5.5 – Industrial Facility Inspections by Business Type and TTWQ Priority

Business Type	High Priority			Medium Priority			Low Priority			All Priorities		
	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected
Sector 50—Wholesale trade (Auto Dismantlers)	4	4	100%	1	1	100%	0	0	0.0%	5	5	100%
Other Sectors	13	14	100%	13	1	7.7%	15	0	0.0%	41	15	36.6%
Totals	75¹	80²	100%	58	7	12.1%	48	0	0.0%	181³	87	48.0%

¹ Total number of high priority sites at beginning of FY 2011-12.

² The amount of inspections exceeds the inventoried facilities as submitted in the FY 2010-11 JURMP Annual Report due to the new additions of facilities in FY 2011-12 and their associated inspections.

³ Total number of industrial sites at beginning of FY 2011-12.

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Table 5.6 – Return to Compliance Statistics for Industrial Facility Inspections

Business Type	Inspection Results			Return to Compliance				
	Inspections Conducted	Observed Non-compliance		Enforcement Actions ⁴			Compliance Status	
		No. of Facilities	% of Facilities	Corrective Action Form ⁵	Re-Inspection	Admin. Citation Warning	Returned to Compliance	On a schedule to return to compliance
Sector 14 – Mining/Quarrying of Non-Metallic Minerals, Except Fuels	18	2	11.1%	0	2	0	2	0
Sector 2434-2700- Wood and Paper Products	4	3	75.0%	0	3	0	3	0
Sector 32 – Stone, Clay, Glass, & Concrete Products	13	5	38.5%	2	3	0	5	0
Sector 34 – Fabricated Metal Products except Machinery & Transportation Equipment	13	3	23.1%	1	1	1	3	0
Sector 35 – Industrial and Commercial Machinery Equipment	2	0	0.0%	0	0	0	0	0
Sector 37 – Transportation Equipment, Incl. Boat Building & Repair	2	1	50.0%	1	0	0	1	0

⁴ Highest level of enforcement needed to return to compliance. All actions began with violations cited on the Stormwater Inspection Report that serves as an initial Notice of Violation.

⁵ The issuance of a Corrective Action Form implies a Notice of Violation.

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Table 5.6 – Return to Compliance Statistics for Industrial Facility Inspections

Business Type	Inspection Results			Return to Compliance				
	Inspections Conducted	Observed Non-compliance		Enforcement Actions ⁴			Compliance Status	
		No. of Facilities	% of Facilities	Corrective Action Form ⁵	Re-Inspection	Admin. Citation Warning	Returned to Compliance	On a schedule to return to compliance
Sector 41 – Local Passenger Transportation, NEC	5	2	40.0%	0	2	0	2	0
Sector 42 – Motor Freight Transportation and Warehousing	10	2	20.0%	1	1	0	2	0
Sector 50 – Wholesale Trade (Auto Dismantler)	5	1	20.0%	0	1	0	0	1
Other Sectors	15	10	66.7%	4	4	2	10	0
Totals	87	29	33.3%	9	17	3	28	1

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Table 5.7 – Potential NOI Non-filers Identified During FY 2011-12 Industrial Inspections and Review

#	Business Name	Location	Business Type/ SIC Code	Watershed	Date Identified	Action Taken / Resolution
1	All-ways Recycling	1425 N. Magnolia Ave. El Cajon, CA 92020	Industrial-Other/ 5093	907.13	10/6/2010, 2/6/2012	Notified operator of requirement to file and provided appropriate materials
2	Institutional Cabinet & Millwork, Inc.	9838 Bond Ave. El Cajon, CA 92021	Wood & Paper Products/ 2431	907.14	11/29/2011	
3	M & M Recycle Center	1485 Magnolia Ave. El Cajon, CA 92020	Industrial-Other/ 5093	907.13	4/21/2011	
4	Mac Cabinetry	2464 S. Santa Fe Ave. Vista, CA 92084	Industrial-Other/ 5093	904.32	1/27/2011, 5/21/2012	
5	Mark's Metals	1988 S. Santa Fe Ave., Suite A Vista, CA 92083	Fabricated Metal Products (Not Equipment)/ 3499	904.32	4/16/2010, 6/22/2011, 6/25/2012	
6	Diamond Concrete Supply, Inc.	10124 Channel Rd. Lakeside, CA 92040	Stone, Clay, Glass & Concrete Products/ 3273	907.12	4/18/2012	
7	Quality Recycling	10027 Vine St. Lakeside, CA 92040	Industrial-Other/ 5093	907.12	6/1/2011	
8	R&H Steel, inc.	1710 Magnolia Ave. El Cajon, CA 92020	Fabricated Metal Products (Not Equipment)/ 3441	907.13	6/8/2011, 4/20/2012	
9	San Diego Powder & Protective Coatings	1702 Magnolia Ave. El Cajon, CA 92020	Fabricated Metal Products (Not Equipment)/ 3479	907.13	6/8/2011, 7/27/2011	
10	SD Granite and Marble Works	2496 S. Santa Fe Ave., Suite C Vista, CA 92084	Stone, Clay, Glass & Concrete Products/ 3281	904.32	2/18/2011, 5/30/2012	

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Table 5.7 – Potential NOI Non-filers Identified During FY 2011-12 Industrial Inspections and Review

#	Business Name	Location	Business Type/ SIC Code	Watershed	Date Identified	Action Taken / Resolution
11	Far West American Iron, Inc.	2534 S. Santa Fe Ave. Vista, CA 92084	Fabricated Metal Products (Not Equipment)/ 3441	904.32	5/11/2012	Notified operator of requirement to file and provided appropriate materials
12	Petrochem Manufacturing, Inc.	15315 Olde Highway 80 El Cajon, CA 92021	Industrial-Other/ 2951	907.14	9/11/2011	
13	Rerock Materials	242 Pine Street Ramona, CA 92065	Mining and Quarrying/ 1442	905.41	4/24/2009, 4/21/2010, 3/21/2011, 3/20/2012	
14	Rivera's Custom Ironworks	2534 S. Santa Fe Ave. Vista, CA 92084	Wood & Paper Products/ 2434	904.32	5/11/2012	
15	ASAP Custom Cabinets	202 Greenfield Dr. Suite D El Cajon, CA 92021	Transportation Equipment & Parts, Including Boat Building/ 3799	907.13	8/13/2008	
16	JPS	106 Hannalei Vista, CA 92083	Stone, Clay, Glass & Concrete Products/ 3281	904.32	4/24/2009, 4/28/2010	
17	Quality Iron Products, Inc.	1426 N. Magnolia Ave. El Cajon, CA 92020	Fabricated Metal Products (Not Equipment)/ 3441	907.13	7/29/2009	
18	Vargas Marble	2568 S. Santa Fe Ave. Vista, CA 92084	Stone, Clay, Glass & Concrete Products/ 3281	904.32	4/22/2009, 4/16/2010	
19	Jose Pereira Engineering & Mechanical, Inc.	1730 N. Magnolia Ave. El Cajon, CA 92020	Fabricated Metal Products (Not Equipment)/ 3499	907.13	8/4/2008	
20	Archibald, Inc. (Affordable Rain gutters)	1402 N. Magnolia Ave. El Cajon, CA 92020	Fabricated Metal Products (Not Equipment)/ 3499	907.13	7/25/2008	
21	Quality Recycling	10197 Riverford Rd. Lakeside, CA 92040	Industrial-Other/ 5093	907.12	10/21/2008	

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Table 5.8 – Assessment of Behavioral Outcomes for the Industrial Sub-element (Level 3 Outcomes)

Outcome Level 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
<p><i>Permit Section I.1.a.(3)</i> requires that, where applicable and feasible, the County assess changes in the behaviors of industrial target audiences resulting from the implementation of the Industrial Component. <i>Permit Section J.3.a.(3)(d)ii</i> further requires that the County confirms, as part of its JURMP annual reports, that designated BMPs were implemented or required to be implemented for industrial sources. Level 3 outcomes for industrial operators are described below. This analysis is based solely on the results of the industrial site inspections described above. Table 5.9 below also provides a multi-year comparison of these results.</p>				
<p>☑ Administrative & Procedural Behaviors</p>		<p>Many types of administrative or procedural changes are necessary as a precursor to other specific targeted outcomes. Examples include development of stormwater pollution plans, changes to operating procedures, or staff training conducted by business operators.</p>		
<p><u>Monitoring Program</u></p>		<p><i>Permit Section D.3.b.(3)(a)ii</i> requires that the County review monitoring data for sites that monitor their runoff. <i>WPO Section 67.808(b)(1)(C)</i> requires that businesses operating under the statewide General Industrial Permit provide for County review a monitoring program satisfying the requirements of the General Industrial Permit. A target of 100% compliance has been established for this outcome because monitoring is a strict Permit requirement for applicable facilities. An overall success rate of 96.5% was observed during FY 2011-12. Although overall implementation results were lower than the targeted value, this difference likely is due to several factors: the difficulties of obtaining runoff samples in a semi-arid region, the strict requirements (sample during the first hour of the first rain event), and facilities new to the General Industrial Permit and monitoring procedures. For those facilities found to be out of compliance with this requirement, inspections were not closed until a monitoring program (at least for recording visual observations) was in place.</p>		
5.2.4.10	100% of applicable facilities (i.e., with a WDID no.) have documentation of a monitoring program satisfying the requirements of the General Industrial Permit (T = 87 facilities)	R _I = 84 facilities produced documentation of a monitoring program satisfying the requirements of the General Industrial Permit	R _A = 96.5% success	100% of applicable facilities (i.e., with a WDID no.) have documentation of a monitoring program satisfying the requirements of the General Industrial Permit

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Table 5.8 – Assessment of Behavioral Outcomes for the Industrial Sub-element (Level 3 Outcomes)

Outcome Level 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
<u>Stormwater Pollution Prevention Plans (SWPPPs)</u>		<p><i>Permit Section D.3.b.(3)(a)i</i> requires that the County review BMP implementation plans (i.e., SWPPPs) for sites that are required to use them. <i>WPO Section 67.808 (b)(1)(B))</i> requires that businesses operating under the statewide General Industrial Permit provide for County review a SWPPP satisfying the requirements of the General Industrial Permit. A target of 100% compliance has been established for this outcome because SWPPPs are a strict Permit requirement for applicable facilities. During FY 2011-12, 94.2% of applicable facilities produced current, complete, site-specific SWPPPs for review on initial inspection. For those facilities found to be out of compliance with this requirement, inspections were not closed until a SWPPP was in place.</p>		
5.2.4.11	100% of applicable facilities (i.e., with a WDID no.) inspected have a current, complete, site-specific SWPPP available for review (T = 87 facilities)	R _I = 82 facilities had a current, complete, site-specific SWPPP available for review	R _A = 94.2% success	100% of applicable facilities (i.e., with a WDID no.) inspected have a current, complete, site-specific SWPPP available for review
<u>Spill Prevention & Response Plans</u>		<p><i>WPO Section 67.808(a)(1)(C)(vi)</i> requires regulated businesses to implement a site-specific spill prevention & response training plan. Such a plan mainly addresses the areas where spills are likely to occur, the location of on-site storm drains and discharge points, the type and location of spill-response materials to be used, and the person(s) responsible for spill containment and cleanup. A target of 100% compliance has been established for this outcome because spill prevention & response plans are a preventive measure for reducing or eliminating illicit discharges from the site. Many regulated businesses have such plans as part of their fire safety or hazardous materials business plan.</p> <p>During FY 2011-12, 100% of inspected facilities had implemented current, complete, site-specific spill prevention & response plans for review on initial inspection.</p>		
5.2.4.12	100% of applicable facilities have a site-specific Spill Prevention & Response Plan (T = 87 facilities)	R _I = 87 facilities had a site-specific plan	R _A = 100% success	100% of applicable facilities have a site-specific Spill Prevention & Response Plan

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Table 5.8 – Assessment of Behavioral Outcomes for the Industrial Sub-element (Level 3 Outcomes)

Outcome Level 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
<u>Annual Facility Reviews</u>		<p>WPO Section 67.808(a)(3) requires that businesses review the operations and procedures relating to protecting the stormwater conveyance system and receiving waters from pollutants at least annually. A target of 100% compliance has been established for this outcome because these reviews are a strict requirement for applicable facilities.</p> <p>During FY 2011-12, 89.6% of inspected facilities produced documentation of a completed annual review on initial inspection. Inspectors followed up on those facilities found to be out of compliance with this requirement.</p>		
5.2.4.13	100% of inspected facilities have completed an annual review of operations and procedures (T = 87 facilities)	R _I = 78 facilities provided documentation of a completed annual review	R _A = 89.6% success	100% of inspected facilities have completed an annual review of operations and procedures
<u>Employee Training</u>		<p>WPO Section 67.808(a)(1)(A) requires that businesses provide training at least annually to all operators, employees, and workers with responsibility for activities that could result in unauthorized discharges. A target of 100% compliance has been established for this outcome because these reviews are a strict requirement for applicable facilities.</p> <p>Nearly 90.0% of inspected facilities provided satisfactory documentation of training on initial inspection. For those facilities found to be out of compliance with this requirement, inspections were not closed until employee training was conducted and documentation of it produced.</p> <p>Training records demonstrate coverage in the eight basic elements: Preventive maintenance, good housekeeping, proper waste disposal, non-stormwater disposal alternatives, equipment/vehicle maintenance and repair, spill prevention and response, recycling, and BMP maintenance.</p>		
5.2.4.14	100% of inspected facilities provided annual training to all operators, employees, and workers (T = 87 facilities)	R _I = 78 facilities had provided annual training to all operators, employees, and workers	R _A = 89.6% success	100% of inspected facilities provide annual training to all applicable operators, employees, and workers

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Table 5.8 – Assessment of Behavioral Outcomes for the Industrial Sub-element (Level 3 Outcomes)

Outcome Level 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
☑ Illicit Discharge Control		<p><i>WPO Section 67.804(a)</i> prohibits any person to discharge or cause the discharge of pollutants directly or indirectly into the stormwater conveyance system or receiving waters, unless exempted or otherwise authorized by law. Illicit discharges are defined as those that leave the site via driveways, brow ditches, on-site storm drains, etc. Spills confined to the site are addressed as violations under BMP Implementation or Spill Prevention & Response. A target of 100% compliance has been established for this outcome because illicit discharge prohibitions are a strict Permit requirement.</p> <p>During FY 2011-12, all facilities did not have illicit discharge violations identified at the time of inspection.</p>		
5.2.4.15	100% of inspected facilities do not have illicit discharge violations (T = 87 facilities)	R _I = 87 inspected facilities did not have illicit discharge violations	R _A = 100% success	100% of inspected facilities do not have illicit discharge violations
☑ BMP Implementation		<p>Implementation of BMPs by facility operators is the most direct measure of successful program implementation. This category of outcomes is measured indirectly through compliance with regulatory requirements (i.e., a lack of observed violations during inspections). Results are described below.</p>		
<u>Facilities with no BMP violations</u>		<p><i>WPO Sections 67.804 through 67.806 and 67.808</i> establish specific BMP standards and requirements applicable to industrial sites and sources. Compliance with these requirements was evaluated during facility inspections. A target of 50% compliance has been established for this outcome because annual inspections include both facilities previously inspected and newly inventoried ones. Of those facilities with one or more BMP violations, these typically included poor housekeeping and material storage. During FY 2011-12, an overall rate of 100% (of the targeted value) was observed.</p>		
5.2.4.16	50% of inspected facilities do not have BMP violations (T = 44 facilities)	R _I = 60 facilities had no BMP violations	R _A = 100% success	50% of inspected facilities do not have BMP violations
<u>Facilities with less than 3 BMP violations</u>		<p>During FY 2011-12, an overall rate of 100% was observed. Inspections were not closed until facilities returned to compliance. (Notes: In Table 5.9, the percentages for FY 2009-10 and FY 2010-11 were re-calculated due to under-reporting of sites with no BMP violations.)</p>		

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Table 5.8 – Assessment of Behavioral Outcomes for the Industrial Sub-element (Level 3 Outcomes)

Outcome Level 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
5.2.4.17	75% of inspected facilities have less than 3 BMP violations (T = 65 facilities)	R _I = 87 facilities had less than 3 BMP violations	R _A = 100% success	75% of inspected facilities have two or fewer BMP violations
<u>Facilities implementing pollution prevention practices</u>		<p><i>Permit Section D.3.b.(2)(a)</i> requires that the County require industrial operators to use pollution prevention (P2) methods where appropriate. <i>WPO Section 67.808(a)(4)</i> requires that businesses implement P2 methods or those stormwater P2 practices that are generally recognized in that discharger's industry or business to eliminate or reduce pollutants in runoff to the MEP.</p> <p>A target of 90% compliance has been established for this outcome because P2 measures are not appropriate for all facilities and industry types. During FY 2011-12, 100% of facilities were observed to implement at least one P2 practice.</p>		
5.2.4.18	90% of inspected facilities implement at least one P2 practice (T = 78 facilities)	R _I = 87 facilities implemented at least one P2 practice	R _A > 100% success	90% of inspected facilities implement at least one P2 practice
☑ Overall Regulatory Compliance		<p>This measure encompasses all potential violations of the WPO for industrial facilities. Because violations are often minor or administrative, some level of overall non-compliance is reasonably expected each year. Since the County began tracking this measure in FY 2004-05, compliance rates have varied from 14% - 40%. A 50% target has therefore been established to provide a reasonable goal for overall improvement. During FY 2011-12, an overall rate of 100% (of the targeted value) was observed.</p>		
5.2.4.19	50% of inspected facilities do not have violations (T = 44 facilities)	R _I = 58 facilities had no violations	R _A > 100% success	50% of inspected facilities do not have violations (paperwork and BMPs)

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Table 5.9 – Multi-year Comparison of Behavioral Outcomes for Industrial Operators

	Percent of Sites Without Violation Type at Initial Inspection ⁶								
Targeted Behaviors	Targeted Percentage	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12
A. Administrative and Procedural Behaviors									
1. Applicable facilities have documentation of a monitoring program satisfying the requirements of the General Industrial Permit	100%	NA ⁷	25%	14%	74%	81%	89.1%	88.9%	96.5 %
2. Applicable facilities have a current, complete, site-specific SWPPP available for review	100%	45%	27%	22%	71%	95%	84.3%	94.4%	94.2%
3. Applicable facilities have a site-specific spill response plan	100%	NA	NA	NA	NA	92%	97.6%	100%	100%
4. Applicable facilities have completed an annual review of operations and procedures	100%	NA	NA	NA	79%	79%	90.0%	90.0%	89.6%
5. Facilities have provided annual training to all operators, employees, and workers	100%	NA	35%	25%	66%	51%	78.0%	82.2%	89.6%
B. Illicit Discharge Control⁸									
1. Inspected facilities do not have any illicit discharge	100%	NA	NA	NA	98%	100%	100%	100%	100%

⁶ Based on targeted values.

⁷ NA is not applicable. Data were not collected in a way to be able to determine these values.

⁸ *Illicit discharge* is one that has left the site via a storm drain, brow ditch or channel, or surface flow. Spills confined to the site are addressed under BMP violations, i.e., spill prevention and response or housekeeping.

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Table 5.9 – Multi-year Comparison of Behavioral Outcomes for Industrial Operators

	Percent of Sites Without Violation Type at Initial Inspection ⁶								
Targeted Behaviors	Targeted Percentage	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12
C. BMP Implementation									
1. Inspected facilities do not have any BMP violations	50%	NA	NA	NA	58%	75%	100%	100%	100%
2. Inspected facilities have less than 3 BMP violations	75%	NA	NA	NA	97%	100%	100%	100%	100%
3. Applicable facilities implement at least one pollution prevention practice	90%	NA	NA	NA	92%	100%	100%	100%	100%
D. Overall Regulatory Compliance									
1. Inspected facilities do not have any violations	50%	14%	40%	38%	42%	46%	92.8%	100%	100%

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5.2.5 Implementation Results for DPW Stationary Commercial Source Management Programs

The County's implementation strategy for stationary commercial sources subject to DPW oversight is described in *JURMP Section 7.2.4*. **Figure 5.2** also provides an overview of the major elements of this strategy as it was implemented during FY 2011-12. Additional documentation, analysis, and discussion are provided as applicable below. Specific targeted outcomes and results for each type of activity are presented in **Table 5.10** and detailed implementation results are presented in **Table 5.15**.

This sub-element addressed the following source types during FY 2011-12:

- Automobile Repair, Maintenance, Fueling, or Cleaning;
- Airplane and Boat Repair, Maintenance, Fueling, and Cleaning;
- Automobile and Other Vehicle Body Repair or Painting;
- Equipment Repair, Maintenance, Fueling, and Cleaning;
- Eating and Drinking Establishments;
- Paintball Fields & Other Recreational Sites;
- Parking Lots and Storage;
- Retail and Wholesale Fueling;
- Animal Facilities (equine facilities and kennels);
- Building Material Retailers and Storage; and
- Other – Miscellaneous.

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DPW Stationary Commercial Businesses Sub-element			
Program Implementation  - DPW Watershed Protection	Target Audiences  - Business Owners, Operators, Employees		Sources  - Misc. Stationary Commercial Businesses (see inventory, Table 5.2)
OUTCOME LEVEL 1 Stormwater Program Activities	OUTCOME LEVEL 2 Knowledge & Awareness	OUTCOME LEVEL 3 Behaviors	OUTCOME LEVEL 4 Source Reductions
<u>Program Administration</u> <input checked="" type="checkbox"/> Program reviews & updates <input checked="" type="checkbox"/> Source inventory updates <input checked="" type="checkbox"/> Staff training <u>Facilitation Activities</u> <input checked="" type="checkbox"/> Partnerships and collaboration <input checked="" type="checkbox"/> Education & outreach <input checked="" type="checkbox"/> Enforcement / return to compliance <u>Feedback Activities</u> <input checked="" type="checkbox"/> Routine site inspections <input checked="" type="checkbox"/> Complaint investigations <input checked="" type="checkbox"/> Special investigations (See Table 5.10 for Level 1 Results)	<input checked="" type="checkbox"/> Not Targeted or Assessed <input checked="" type="checkbox"/> Administrative & procedural behaviors <input checked="" type="checkbox"/> Illicit discharge control <input checked="" type="checkbox"/> BMP implementation <input checked="" type="checkbox"/> Regulatory compliance (See Table 5.15 for Level 3 Results)		<input checked="" type="checkbox"/> Not Targeted or Assessed

Figure 5.2 – FY 2011-12 Implementation and Assessment Strategy for the DPW Stationary Commercial Sub-element

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Outcome Level 1

Table 5.10 – Program Implementation and Assessment Results for the DPW Stationary Commercial Sub-element (Level 1 Outcomes)

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
<u>Program Administration</u>		A variety of administrative activities are necessary to support the operation and management of this element of the County's stormwater program. These are described below.			
☑ Program reviews & updates		Throughout each fiscal year, County staff provides a thorough review of all elements of its JURMP and ancillary program materials to determine whether modifications are necessary. See Table 5.27 for an updated list and schedule of modifications.			
<u>Completion of identified program modifications</u>		The status of program modifications identified in last year's JURMP Annual Report is described below.			
5.2.5.1	Not targeted	R _I = None	No additional assessment currently needed	Not targeted	No substantial modifications were identified during the review of the JURMP in FY 2011-12.
<u>Identification of additional needed program modifications</u>		An annual review of JURMP Section 7.2 and other ancillary program documentation was completed. A comprehensive review was performed during the development of this JURMP Annual Report. No additional modifications are necessary at this time.			
☑ Source inventory updates (T = completion)		In accordance with Permit Section D.3.b.(1) , source inventories are reviewed and updated at least annually to ensure that they are current and complete, and that threat-to-water-quality prioritizations are correct. The County updated its inventory of stationary commercial facilities on 07-15-12. This update is described in Table 5.2 and presented in Attachment 5.1.2 .			
☑ Staff training		See Section 4.14.			
<u>Facilitation Activities</u>		Facilitation activities are those which assist, encourage, or require changes in the knowledge or behaviors of the individuals and populations to which program activities are directed. Facilitation results for this element are described below.			
☑ Partnerships & collaboration		Partnerships allow the County to extend its influence with commercial facilities and operators through other parties such as professional and industry organizations. These groups often assist with outreach directly, or they provide forums for County staff to conduct outreach or training to their members.			

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Outcome Level 1

Table 5.10 – Program Implementation and Assessment Results for the DPW Stationary Commercial Sub-element (Level 1 Outcomes)

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.5.2	Coordinate with utilities and special districts (T = completion)	R _{I+A} = 5 utilities and special districts associations contacted (complete)		Not targeted	<p>San Diego Gas and Electric is a partner for outreach to commercial businesses. Although no specific activities were conducted during FY 2011-12, they have provided funding that is being used through the Green Business Program and have agreed to participate in outreach to commercial businesses as opportunities arise.</p> <p>San Diego County Water Authority is a partner for outreach to commercial businesses. No specific activities for commercial and industrial businesses were conducted in FY 2011-12. SD County Water Authority representatives have agreed to work cooperatively to develop and participate in outreach to business owners, operators, and employees.</p> <p>Cuyamaca College has been an excellent partner for education and outreach efforts, by offering venues and partnering on outreach workshops. These programs include the Environmental Training Center, the Automotive Technology Program, and the Horticultural Department.</p> <p>Southwestern College has been an excellent partner for education and outreach and has hosted workshops at the Otay Mesa Campus. County staff continues to participate on the Advisory Board for the Environmental Technology Program, a vocational program for many students already working in commercial and industry businesses.</p> <p>California Center for Sustainable Energy has continued to be a good partner for outreach to commercial businesses. Representatives at the Center have allowed County staff to give updates and provide information at events geared to commercial businesses.</p>

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**Table 5.10 – Program Implementation and Assessment Results for the DPW Stationary Commercial Sub-
element (Level 1 Outcomes)**

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.5.3	Coordinate efforts with other agencies (T = completion)	R _{I+A} = 1 agency task force contacted (completion)		Not targeted	<p>The County continued to participate in one task force.</p> <p>The Green Business Program certifies businesses that meet criteria in the areas of pollution prevention, waste management, water conservation, and energy conservation. As more jurisdictions are forming “Green Business” type programs, the County Green Business program took a hiatus during FY 2011-12. The re-organized program will put more efforts for outreach to businesses in the unincorporated areas, rather than across the entire region.</p> <p>The County received funding through SDG&E for energy efficiency programs and has initiated work with SDG&E to include energy efficiency and reduced runoff information displays in a new commercial test kitchen in the Kearney Mesa area.</p> <p>The County continues to participate in the Negocio Verde Task Force partnership. The Task Force continued to implement workshops for auto repair and auto body and paint shop representatives. Workshops are bi-lingual (simultaneously presented in English and Spanish) to benefit Spanish-speaking members of this audience.</p> <p>The Border Area Development for Growth of Environmental Responsibility (BADGER) Grant workshop was initiated in FY 2010-11 with the final workshop completed in FY 2011-12. The final workshop was conducted on September 21, 2011 at Cuyamaca College, El Cajon.</p>
☑ Education & outreach		<p>Various outreach methods can be used to bring about changes in the knowledge or behaviors of commercial operators or employees. Outreach to these target audiences is embedded in the inspection process and can be conducted independently through other means. Results are described below.</p>			

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Outcome Level 1

Table 5.10 – Program Implementation and Assessment Results for the DPW Stationary Commercial Sub-element (Level 1 Outcomes)

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.5.4	Notify new commercial owners / operators of BMP requirements (T = 19 sites)	R _I = 19 new sites received BMP notifications	R _A = 100% completion	Not targeted	Although the DPW stationary commercial inventory decreased by 73 sites, 19 new sites were added and their operators were notified of the BMP requirements as part of the inspection.
<u>Presentations, Workshops, Trainings (including industry associations)</u>					
5.2.5.5	Conduct compliance workshops for auto repair and auto body shop owners, operators, and employees (T = completion)	R _{I+A} = 1 workshop conducted (complete)		Not targeted	A multi-media bi-lingual (English-Spanish) workshop was held and covered aspects of compliance for automotive repair and auto body/painting shop owners, operators, and employees. Presentations included topics from the Hazardous Materials Division, Air Pollution Control District, and Watershed Protection Program.
☑ Outreach during Inspections		During inspections, business operators receive materials on stormwater compliance and BMP requirements. Business-specific and Pollution Prevention fact sheets are distributed to operators as applicable. A General Business fact sheet is also used where facility-specific materials are not available. The inspector and operator discuss the site-specific activities and then identify associated BMPs on the fact sheets. The operator then uses the sheet as a guide for conducting employee stormwater training. Operators are instructed to keep the fact sheet with the training records, spill response plan, and other stormwater-related materials. On subsequent inspections, inspectors ask for the fact sheet or replace it on request. The operator and inspector can then discuss existing BMP effectiveness, any changes in operations, and implementation of new BMPs.			

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Outcome Level 1

Table 5.10 – Program Implementation and Assessment Results for the DPW Stationary Commercial Sub-element (Level 1 Outcomes)

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ☒	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.5.6	Provide education to operators during commercial inspections (T = 289 operators)	R _I = education provided during 289 inspections, including all high priority sites in the inventory	R _A = 100% complete	Provide education to operators during commercial inspections	During FY 2011-12, one-to-one education was provided to operators during all commercial inspections. Training documents included a training form, listing the eight key categories to be covered; a self-assessment checklist to assist operators in their annual site review; and BMP fact sheets as applicable to the facility.
☑ Enforcement / return to compliance		Enforcement actions are used to require a return to compliance with applicable legal requirements. Each year, the County sets a target of correcting all instances of non-compliance observed during routine inspections. Success is measured as verification of a return to compliance or that a facility was working within established schedules to return to compliance.			
5.2.5.7	Correct all instances of non-compliance observed during site inspections (T = 161 instances)	R _I = 161 facilities returned or on schedule to return to compliance	R _A = 100% complete	Correct all instances of non-compliance observed during site inspections	As in previous years, the County set a target of correcting all instances of non-compliance observed during routine inspections in FY 2011-12. In each instance, success was measured as verification of a return to compliance or that a facility was working within established schedules to return to compliance. As shown in Table 5.13 , 55.7% (161 of 289) of inspected facilities had one or more violations. Table 5.13 also provides summary information on enforcement actions associated with commercial facility site inspections, including numbers of violations, types of enforcement actions taken, and compliance status. As shown, all instances of non-compliance were either resolved during FY 2011-12 or on a schedule to be resolved early in FY 2012-13. Additional site-specific compliance data for individual facilities, including information on any necessary follow-up actions taken, can be found in Attachment 5.3.2 . At the time of the completion of this report, 160 facilities had returned to compliance, and one facility was on track to return to compliance

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Outcome Level 1

Table 5.10 – Program Implementation and Assessment Results for the DPW Stationary Commercial Sub-element (Level 1 Outcomes)

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ☒	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.5.8	Correct all instances of non-compliance observed during complaint investigations (T = 25 complaints)	R _I = 25 facilities returned or are on schedule to return to compliance	R _A = 100% complete	Correct all instances of non-compliance observed during complaint investigations	During FY 2011-12, DPW staff investigated 25 justified stormwater-related complaints involving stationary commercial facilities. All 25 stormwater related complaints returned to compliance. More information is presented in Table 5.14 .
<u>Feedback Activities</u> <p>Feedback Activities are conducted to determine whether and to what degree targeted changes are occurring in targeted staff. The implementation of feedback activities for this element is described below. Results of feedback obtained are provided in Table 5.15.</p>					
☑ Routine site inspections		Site inspections are used to verify compliance and to determine whether additional actions are required to correct non-compliance. Inspections typically consist of observations, record reviews, and sampling as needed. Site inspection results are described below.			
5.2.5.9	Inspect 100% of high priority commercial facilities (T = 162 facilities)	R _I = 162 high priority facilities inspected	R _I = 100% complete	Inspect 100% of high priority commercial facilities	<p>Permit Section D.3.b.(3)(b) requires that the County inspect at least 100% of high priority and 25% of all stationary commercial sources in its inventory.</p> <p>Summarized inspection results, including the total number of inventoried sources and inspections conducted for each business type and priority category, are presented in Table 5.12. Detailed inspection results are also presented by facility in Attachment 5.3.2.</p>

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Outcome Level 1

Table 5.10 – Program Implementation and Assessment Results for the DPW Stationary Commercial Sub-element (Level 1 Outcomes)

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.5.10	Inspect 25% of the total commercial inventory (T = 360 facilities)	R _I = 289 facilities inspected	R _A > 80.3% complete	Inspect 25% of the total commercial inventory	<p>The commercial facilities inspected in FY 2011-12 were selected as follows: First, all high priority facilities; second, facilities in the same drainage area, when feasible; and lastly, as part of a complaint investigation.</p> <p>For the combined DPW and AWM commercial stationary inventory, the 100% high priority and 25% total inventory Permit requirements were met for FY 2011-12 (see AWM sections 5.2.6.8 and 5.2.6.9).</p>
☑ Complaint investigations		Complaint investigations are similar to site inspections except that they are in response to reports of potential violations (often received via the Hotline or County staff referrals).			
5.2.5.11	Investigate all justified stationary commercial complaints (T = 25 complaints)	R _I = investigated 25 justified stationary commercial complaints	R _A = 100% complete	Investigate all justified stationary commercial complaints	During FY 2011-12, staff investigated 25 stormwater-related complaints involving stationary commercial facilities. All 25 cases were resolved and returned to compliance.
☑ Special investigations		No special investigations were conducted in FY 2011-12.			

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Table 5.11 – Detailed Results of Outreach and Notification Activities for DPW Stationary Commercial Target Audiences

Date	Specific Audience	Audience Size	Location	Description
Presentations, Workshops, and Trainings				
3-8-2012	Landscape companies, property owners, and horticulturists	250	Cuyamaca College El Cajon	The County sponsored the Sustainable Urban Landscapes Conference at Cuyamaca College. The purpose of the conference was to learn about sustainable landscape design, installation, and related techniques. The County hosted a booth in the lobby and provided information on stormwater BMPs including water conservation, erosion control, composting and mulching practices.
9-21-2011	Compliance Workshop for auto repair and auto body shop owners, operators and employees	33	Cuyamaca College El Cajon	A multi-media workshop was conducted to address various aspects of compliance for automotive repair and auto body and painting shops owners, operators, and employees. Presentations included topics from Hazardous Materials Division, Air Pollution Control District, and Watershed Protection Program. Information was presented simultaneously in English and Spanish. Pollution Prevention was the emphasis of this workshop.
FY 2011-12	Small Businesses	300	County of San Diego	The County of San Diego Dept. of Environmental Health (DEH) received funding from the American Recovery & Reinvestment Act (ARRA) Energy Efficiency & Conservation Block Grant Program to assist small businesses with proper recycling of fluorescent lamps. Newer fluorescent lamps can be an energy-efficient alternative to standard incandescent and older style fluorescent lighting; however, because of the mercury content, these lamps must be managed properly at the end of their useful life. Through this program, DEH provided over 1,200 recycling kits to nearly 300 small businesses in FY 2011-12. Businesses sent in over 21,000 lamps (approximately 11,000 pounds) for recycling. This program serves businesses throughout the County of San Diego. Proper recycling of fluorescent lamps helps prevent mercury from being released into the environment, including water resources. Outreach has been conducted to businesses via press releases, various chambers of commerce and business association newsletters and websites. Outreach has focused on the importance (and state requirement) of properly recycling these lamps.

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Table 5.11 – Detailed Results of Outreach and Notification Activities for DPW Stationary Commercial Target Audiences

Date	Specific Audience	Audience Size	Location	Description
FY 2011-12	Food Establishments	In progress	County of San Diego Operations Center	DEH is partnering with San Diego Gas and Electric to construct an interactive “kiosk” to provide information to restaurants and other food facilities on “greening” their operations. The main focus of the kiosk is energy efficiency strategies. However, other topics include water conservation, waste reduction and pollution prevention. The kiosk is being constructed in the main permit lobby at DEH, where hundreds of businesses visit each month. The videos being developed for the kiosk will also be available on the DEH Green Business website and will be mailed out to over 12,000 currently permitted food establishments.
4/17/2012	Commercial Property Managers/Owners	1,500	San Diego Convention Center	The SDCAA Education Conference and Expo Conference is an educational conference and trade show for owners and managers of multi-family complexes, including apartments, condos and home owners associations. The booth was shared with the Regional Copermittees and provided materials and handouts for general stormwater P2, as well as specific materials for some of the cities and County. Owners and managers were eager to learn about integrated pest management, rainwater harvesting, spill clean-up and recycling.
Outreach During Inspections				
FY 2011-12	Business operators	289	Multiple	During FY 2011-12, education was provided during 289 inspections. Business operators received materials on stormwater BMP requirements during routine inspections. Business-specific and Pollution Prevention fact sheets were distributed to operators. A General Business fact sheet was used where facility-specific materials were not available. The inspector and operator discussed the site-specific activities and then identified associated BMPs on the fact sheets. The operator then used the sheet as a guide for conducting employee stormwater training. The operator was instructed to keep the fact sheet with the training records, spill response plan, and other stormwater-related materials. On subsequent inspections, the inspector asked for the fact sheet or replaced it on request. The operator and inspector then discussed existing BMP effectiveness and any changes in operations and the new BMPs implemented.

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Table 5.11 – Detailed Results of Outreach and Notification Activities for DPW Stationary Commercial Target Audiences

Date	Specific Audience	Audience Size	Location	Description
Combined Outreach Totals				

Totals 2,372

Table 5.12 – DPW Stationary Commercial Facility Inspections by Business Type and TTWQ Priority

Business Type	High Priority			Medium Priority			Low Priority			All Priorities		
	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected
Automobile Repair, Maintenance, Fueling, or Cleaning	25	26	100%	175	29	16.6%	65	10	15.4%	265	65	24.5%
Airplane and Boat Repair, Maintenance, Fueling, and Cleaning	0	0	0.0%	5	0	0.0%	1	0	0.0%	6	0	0.0%
Automobile and Other Vehicle Body Repair or Painting	3	3	100%	35	3	8.6%	12	0	0.0%	50	6	12.0%
Equipment Repair, Maintenance, Fueling, and Cleaning	15	15	100%	24	1	4.2%	4	0	0.0%	43	16	37.2%
Eating and Drinking Establishments	31	31	100%	226	23	10.2%	287	12	4.2%	544	66	12.1%
Paintball Fields & Other Recreational Sites	2	2	100%	0	0	0.0%	0	0	0.0%	2	2	100%

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Table 5.12 – DPW Stationary Commercial Facility Inspections by Business Type and TTWQ Priority

Business Type	High Priority			Medium Priority			Low Priority			All Priorities		
	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected
Parking Lots and Storage	8	8	100%	6	3	50.0%	3	0	0.0%	17	11	64.7%
Retail and Wholesale Fueling	4	4	100%	55	17	30.9%	37	2	5.4%	96	23	23.9%
Animal Facilities (kennels and equine)	46	46	100%	109	5	4.5%	18	0	0.0%	173	51	29.5%
Building Material Retail/Storage	1	1	100%	14	0	0.0%	8	0	0.0%	23	1	4.3%
Mobile Operators-Headquarters	18	20	100%	54	4	7.4%	23	1	4.3%	95	25	26.3%
Tire Shop	1	1	100%	11	1	9.1%	12	1	8.3%	24	3	12.5%
Other – Miscellaneous	8	8	100%	52	8	15.4%	41	4	9.7%	101	20	19.8%
	162	165⁹	100%	766	94	12.3%	511	30	5.9%	1439	289	20.1%

⁹ The amount of inspections exceeds the inventoried facilities as submitted in the FY 2010-11 JURMP Annual Report due to the new additions of facilities in FY 2011-12 and their associated inspections.

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Table 5.13 – Return to Compliance Statistics for DPW Stationary Commercial Facility Inspections

Business Type	Inspection Results							
	Inspections Conducted	Observed Non-compliance		Enforcement Actions			Compliance Status	
		No. of Facilities	% of Facilities	Corrective Action Form	Re-Inspection	Admin. Citation Warning	Returned to Compliance	On a schedule to return to compliance
Automobile Repair, Maintenance, Fueling, or Cleaning	65 ¹⁰	38	58.5%	13	25	0	38	0
Airplane and Boat Repair, Maintenance, Fueling, and Cleaning	0	0	0.0%	0	0	0	0	0
Automobile and Other Vehicle Body Repair or Painting	6	4	66.7%	2	2	0	4	0
Equipment Repair, Maintenance, Fueling, and Cleaning	16	12	75.0%	1	11	0	12	0
Eating and Drinking Establishments	66	36	54.5%	11	25	0	36	0
Paintball Fields & Other Recreational Sites	2	2	100%	0	2	0	2	0
Parking Lots and Storage	11	5	45.4%	1	4	0	4	1

¹⁰ Inspections conducted account for multiple inspections for the same facilities within the fiscal year.

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Table 5.13 – Return to Compliance Statistics for DPW Stationary Commercial Facility Inspections

Business Type	Inspection Results							
	Inspections Conducted	Observed Non-compliance		Enforcement Actions			Compliance Status	
		No. of Facilities	% of Facilities	Corrective Action Form	Re-Inspection	Admin. Citation Warning	Returned to Compliance	On a schedule to return to compliance
Retail and Wholesale Fueling	23	17	73.9%	9	8	0	17	0
Animal Facilities (kennels and equine)	51	20	39.2%	13	7	0	20	0
Building Material Retailers and Storage	1	1	100%	0	1	0	1	0
Mobile Operators-Headquarters	25	15	60.0%	2	13	0	15	0
Tire Shop	3	3	100%	1	2	0	3	0
Other – Miscellaneous	20	8	40.0%	4	3	1	8	0
Totals	289	161	55.7%	57	103	1	160	1

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Table 5.14 – Summary Complaint Statistics (DPW Stationary Commercial Sources)

Business Type	# Justified Complaints	Pollutant Type											Enforcement Actions ¹¹							Compliance Status	
		Sediment	Concrete Waste	Manure	Nutrients	Sewage	Trash/Debris	Auto Fluids	Aqueous	Paint	Grease	Chemicals / Other	Verbal Warning/Advisory	Notice of Violations	Corrective Action Form	Re-Inspection	Admin. Citation Warning	Not Applicable	Referral	Returned to Compliance	On a schedule to return to compliance
Automobile Repair, Maintenance, Fueling, or Cleaning	4	0	0	0	0	0	0	3	0	0	1	0	1	1	0	2	0	0	0	4	0
Airplane and Boat Repair, Maintenance, Fueling, or Cleaning	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Automobile and Other Vehicle Body Repair or Painting	1	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	1	0
Equipment Repair, Maintenance, Fueling, or Cleaning	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Eating and Drinking Establishments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Paintball Fields & Other Recreational Sites	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Parking Lots and Storage	3	0	0	0	0	1	1	1	0	0	0	0	1	1	0	0	1	0	0	3	0
Retail and Wholesale Fueling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Animal Facilities (kennels and equine)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

¹¹ *Corrective Action Forms and Re-Inspections* originated with a Notice of Violation.

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Table 5.14 – Summary Complaint Statistics (DPW Stationary Commercial Sources)

Business Type	# Justified Complaints	Pollutant Type											Enforcement Actions ¹¹							Compliance Status	
		Sediment	Concrete Waste	Manure	Nutrients	Sewage	Trash/Debris	Auto Fluids	Aqueous	Paint	Grease	Chemicals / Other	Verbal Warning/Advisory	Notice of Violations	Corrective Action Form	Re-Inspection	Admin. Citation Warning	Not Applicable	Referral	Returned to Compliance	On a schedule to return to compliance
Building Materials Retailers and Storage	1	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0
Mobile Operators-Headquarters	1	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	1	0
Cement Mixing or Cutting	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Landscaping	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mobile Automobile or Other Vehicle Washing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other-Construction & Misc.	15	0	0	1	1	0	1	2	4	0	3	3	5	1	1	3	0	1	4	15	0
Totals	25	0	0	1	1	1	2	7	5	0	4	4	9	4	1	5	1	1	4	25	0

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Table 5.15 – Assessment of Behavioral Outcomes for the DPW Stationary Commercial Sub-element (Level 3 Outcomes)

Outcome Level 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
Outcome Level 3: Behaviors and BMP Implementation				
<p><i>Permit Section I.1.a(3)</i> requires that, where applicable and feasible, the County assess changes in the behaviors of target audiences resulting from the implementation of its Stationary Commercial Element. <i>Permit Section J.3.a.(3)(d)ii</i> further requires that the County confirms, as part of its JURMP annual reports, that designated BMPs were implemented or required to be implemented for commercial sources. Level 3 outcomes for commercial operators are described below. This analysis is based solely on the results of the site inspections described above. Table 5.16 below also provides a multi-year comparison of these results.</p>				
☑ Administrative & Procedural Behaviors		<p>Many types of administrative or procedural changes are necessary as a precursor to other specific targeted outcomes. Examples include development of stormwater pollution plans, changes to operating procedures, or staff training conducted by business operators.</p>		
<p><u>Spill Prevention & Response Plans</u></p>		<p><i>WPO Section 67.808(a)(1)(C)</i> requires regulated businesses to implement a site-specific spill prevention & response training plan. Such a plan addresses the areas where spills are likely to occur, the location of on-site storm drains and discharge points, the type and location of spill-response materials to be used, and the person(s) responsible for spill containment and cleanup. A target of 100% compliance has been established for this outcome because spill prevention & response plans are a preventive measure for reducing or eliminating illicit discharges from the site. Many regulated businesses have such plans as part of their fire safety or hazardous materials business plan. A target of 100% compliance has been established for this outcome because spill prevention & response plans are a strict Permit requirement for applicable facilities</p> <p>Inspection results provided in Attachment 5.3.2 list a “Spills” column.</p> <p>During FY 2011-12, 98.3% of inspected facilities provided current, complete, site-specific Spill Response Plans for review on initial inspection.</p>		
5.2.5.13	100% of applicable facilities have a site-specific Spill Prevention & Response Plan (T = 289 facilities)	R _I = 284 inspected facilities had a site-specific Spill Prevention & Response Plan	R _A = 98.3% success	100% of applicable facilities have a site-specific Spill Prevention & Response Plan

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Table 5.15 – Assessment of Behavioral Outcomes for the DPW Stationary Commercial Sub-element (Level 3 Outcomes)

Outcome Level 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
<u>Annual Facility Reviews</u>		<p>WPO Section 67.808(a)(3) requires that businesses review the operations and procedures relating to protecting the stormwater conveyance system and receiving waters from pollutants at least annually. A standard annual review document was distributed and implemented in FY 2010-11 and again in FY 2011-12, as needed.</p> <p>A target of 100% compliance has been established for this outcome since annual reviews are required of all facilities.</p>		
5.2.5.14	100% of inspected facilities have completed an annual review of operations and procedures (T = 289 facilities)	R _I = 197 facilities provided documentation of a completed annual review	R _A = 68.2% success	100% of inspected facilities have completed an annual review of operations and procedures
<u>Employee Training</u>		<p>WPO Section 67.808(a)(1)(A) requires that businesses provide training at least annually to all operators, employees, and workers with responsibility for activities that could result in unauthorized discharges. A target of 100% compliance has been established for this outcome because these reviews are a strict requirement for applicable facilities.</p> <p>During FY 2011-12, training records had to demonstrate coverage in eight basic elements: Preventive maintenance, good housekeeping, proper waste disposal, non-stormwater disposal alternatives, equipment/vehicle maintenance and repair, spill prevention and response, recycling, and BMP maintenance.</p> <p>For those facilities found to be out of compliance with this requirement, inspections were not closed until employee training was conducted and documentation of it produced.</p>		
5.2.5.15	100% of inspected facilities provide annual training to all operators, employees, and workers (T = 289 facilities)	R _I = 175 facilities had provided annual training	R _A = 60.5% success	100% of inspected facilities provide annual training to all operators, employees, and workers

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Table 5.15 – Assessment of Behavioral Outcomes for the DPW Stationary Commercial Sub-element (Level 3 Outcomes)

Outcome Level 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
☑ Illicit Discharge Control		<p><i>WPO Section 67.804(a)</i> prohibits any person to discharge or cause the discharge of pollutants directly or indirectly into the stormwater conveyance system or receiving waters, unless exempted or otherwise authorized by law. <i>Illicit discharges</i> are defined as those that leave the site via driveways, brow ditches, on-site storm drains, etc. Spills confined to the site are addressed as violations under BMP Implementation or spill prevention & response. A target of 100% compliance has been established for this outcome because illicit discharge prohibitions are a strict Permit requirement.</p> <p>During FY 2011-12, 100% of facilities did not have any illicit discharge violations at the time of inspection.</p>		
5.2.5.16	100% of inspected facilities do not have illicit discharge violations (T = 289 facilities)	R _I = 289 inspected facilities did not have illicit discharge violations	R _A = 100% success	100% of inspected facilities do not have illicit discharge violations
☑ BMP Implementation		<p>Implementation of BMPs by facility operators is the most direct measure of successful program implementation. This category of outcomes is measured indirectly through compliance with regulatory requirements (i.e., a lack of observed violations during inspections). Results are described below.</p>		
<u>Compliance with BMP Requirements</u>		<p><i>WPO Sections 67.804 through 67.806 and 67.808</i> establish specific BMP standards and requirements applicable to commercial sites and sources. Compliance with these requirements was evaluated during facility inspections. The County tracks two measures for year-to-year comparison; (1) the percentage of facilities with no BMP violations, and (2) the percentage of facilities with less than three BMP violations.</p>		
<u>Facilities with no BMP violations</u>		<p><i>WPO Sections 67.804 through 67.806 and 67.808</i> establish specific BMP standards and requirements applicable to commercial sites and sources. Compliance with these requirements was evaluated during facility inspections.</p> <p>A target of 50% compliance (or 145 facilities) has been established for this outcome because annual inspections will include facilities previously inspected and newly inventoried ones. Overall, 140 (or 96.5% of targeted facilities) were compliant with respect to BMP implementation and maintenance requirements.</p>		

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Table 5.15 – Assessment of Behavioral Outcomes for the DPW Stationary Commercial Sub-element (Level 3 Outcomes)

Outcome Level 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
5.2.5.17	50% of inspected facilities do not have BMP violations (T = 145 facilities)	RI = 140 facilities had no BMP violations	RA = 96.5% Success	50% of inspected facilities do not have BMP violations
<u>Facilities with less than 3 BMP violations</u>		During FY 2011-12, an overall rate of 61.7% was observed. Inspections were not closed until facilities returned to compliance.		
5.2.5.18	75% of inspected facilities have less than 3 BMP violations (T = 217 facilities)	R _I = 134 facilities had less than 3 BMP violations	R _A = 61.7% success	75% of inspected facilities have less than 3 BMP violations
<u>Implementation of Pollution Prevention Practices</u>		<p><i>Permit Section D.3.b.(2)(a)</i> requires that the County require commercial operators to use P2 methods where appropriate. <i>WPO Section 67.808(a)(4)</i> requires that businesses implement P2 methods or those stormwater P2 practices that are generally recognized in that discharger's industry or business to eliminate or reduce pollutants in runoff to the MEP. A target of 50% compliance has been established for this outcome since this component includes a wide variety of business types, and it is not certain that P2 measures are appropriate for all of them. This target will be periodically re-evaluated.</p> <p>During FY 2011-12, an overall rate of 100% was observed.</p>		
5.2.5.19	50% of inspected facilities implement at least one pollution prevention practice (T = 145 facilities)	R _I = 289 facilities implemented at least one pollution prevention practice	R _A > 100% success	50% of inspected facilities implement at least one pollution prevention practice

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Table 5.15 – Assessment of Behavioral Outcomes for the DPW Stationary Commercial Sub-element (Level 3 Outcomes)

Outcome Level 3

FY 2011-12 Targets (T) ◎		Implementation Result (R _I) ☑	Assessment Result (R _A) ☒	Next Fiscal Year Targets ◎
☑ Overall Regulatory Compliance (facilities with no violations)		This measure encompasses all potential violations of the WPO for commercial facilities. Since violations are often minor or administrative, some level of overall non-compliance is reasonably expected each year. Since the County began tracking this measure in FY 2004-05, compliance rates have varied from 14% - 40%. A 50% target has therefore been established to provide a reasonable goal for overall improvement. During FY 2011-12, an overall rate of 88.3% was observed.		
5.2.5.20	50% of inspected facilities do not have violations (T = 145 facilities)	R _I = 128 facilities had no violations	R _A = 88.3% success	50% of inspected facilities do not have violations

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Table 5.16 – Multi-year Comparison of Behavioral Outcomes for DPW Stationary Commercial Sources

Targeted Behaviors	Percent of Sites Without Violation Type at Initial Inspection								
	Targeted Percentage	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12
A. Administrative and Procedural Behaviors									
1. Applicable facilities have a current, complete, site-specific SWPPP available for review	100%	NA ¹²	NA	NA	NA	NA	NA	NA	NA
2. Applicable facilities have a site-specific spill response plan	100%	NA	NA	NA	NA	96%	95%	97.6%	98.3%
3. Applicable facilities have completed an annual review of operations and procedures	100%	NA	NA	NA	NA	83%	68.7%	41%	68.2%
4. Facilities have provided annual training to all operators, employees, and workers	100%	NA	35%	25%	71%	26%	43%	48.5%	60.5%
B. Illicit Discharge Control									
1. Inspected facilities do not have any discharge violations	100%	NA	NA	NA	100%	100%	100%	100%	100%
C. BMP Implementation									
1. Inspected facilities do not have any BMP violations	50%	NA	NA	NA	48%	63%	85.1%	83.9%	96.5%
2. Inspected facilities have two or less BMP violations	75%	NA	NA	NA	47%	53%	68.5%	77.3%	61.7%
3. Applicable facilities implement at least one pollution prevention practice	50%	NA	NA	NA	NA	90%	100%	100%	100%

¹² NA is not applicable. Data were not collected in a way to be able to determine these values.

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Table 5.16 – Multi-year Comparison of Behavioral Outcomes for DPW Stationary Commercial Sources

	Percent of Sites Without Violation Type at Initial Inspection								
Targeted Behaviors	Targeted Percentage	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12
D. Overall Regulatory Compliance									
Inspected facilities do not have any violations	50%	14%	40%	38%	36%	22%	58.1%	79%	88.3%

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5.2.6 Implementation Results for AWM Stationary Commercial Source Management Programs

The County's implementation strategy for stationary commercial sources subject to AWM oversight is described in *JURMP Section 7.2.4*.

Figure 5.3 also provides an overview of the major elements of this strategy as it was implemented during FY 2011-12. Additional documentation, analysis, and discussion are provided in **Table 5.17** through **Table 5.23** below. In accordance with *JURMP Table 7.1*, this sub-element addressed the following source types during FY 2011-12:

- Pest Control Services (headquarters);
- Nurseries and Greenhouses;
- Golf Courses;
- Cemeteries; and
- Other Agricultural Businesses.

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AWM Stationary Commercial Businesses Sub-element			
Program Implementation	Target Audiences		Sources
 <ul style="list-style-type: none"> - AWM Water Quality Program 	 <ul style="list-style-type: none"> - Business Owners, Operators, Employees 		 <ul style="list-style-type: none"> - Misc. Commercial Businesses (see Table 5.2)
OUTCOME LEVEL 1	OUTCOME LEVEL 2	OUTCOME LEVEL 3	OUTCOME LEVEL 4
Stormwater Program Activities	Knowledge & Awareness	Behaviors	Source Reductions
<p><u>Program Administration</u></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Program reviews & updates <input checked="" type="checkbox"/> Source inventory updates <input checked="" type="checkbox"/> Staff training <p><u>Facilitation Activities</u></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Partnerships & collaboration <input checked="" type="checkbox"/> AWM-AWQ website operation <input checked="" type="checkbox"/> Education & outreach <input checked="" type="checkbox"/> Enforcement / return to compliance <p><u>Feedback Activities</u></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Site inspections <input checked="" type="checkbox"/> Complaint investigations <input checked="" type="checkbox"/> Surveys and special investigations <p>(See Table 5.17 for Level 1 Results)</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Basic concepts <input checked="" type="checkbox"/> Specific knowledge <input checked="" type="checkbox"/> Administrative & procedural behaviors <input checked="" type="checkbox"/> Illicit discharge control <input checked="" type="checkbox"/> BMP implementation <input checked="" type="checkbox"/> Regulatory compliance <p>(See Table 5.22 for Level 2 and 3 Results)</p>		<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Not Targeted or Assessed

Figure 5.3 – FY 2011-12 Implementation and Assessment Strategy for the AWM Stationary Commercial Sub-element

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Outcome Level 1

Table 5.17 – Program Implementation and Assessment Results for the AWM Stationary Commercial Sub-element (Level 1 Outcomes)

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊗	Next Fiscal Year Targets ⊙	Explanation 📄
<u>Program Administration</u>		A variety of administrative activities are necessary to support the operation and management of this element of the County's stormwater program. These are described below.			
☑ Program reviews & updates		Throughout each fiscal year, County staff provides a thorough review of all elements of its JURMP and ancillary program materials to determine whether modifications are necessary. See Table 5.27 for an updated list and schedule of modifications.			
<u>Completion of identified program modifications</u>		The status of program modifications identified in last year's JURMP Annual Report is described below.			
5.2.6.1	Add potential pollutants to the AWM inventory (T = completion)	R _{I+A} = complete ¹³		None Identified	Sites were identified that were tributary to a Clean Water Act section 303(d) water body segment and that potentially generate pollutants categories for which the water body segment is impaired.
5.2.6.2	Develop manager reports for new <i>Accela</i> software system to facilitate data retrieval and reporting. (T = 3 reports)	R _I = 3 management reports developed	R _A = 100 % complete	Develop and/or redesign data fields for <i>Accela</i> to facilitate data retrieval and reporting.	The department of AWM is utilizing <i>Accela</i> , a data management system. Continuous improvement of the system is ongoing.
5.2.6.3	Complete GIS mapping of agricultural sites. (T= completion)	R _{I+A} = mapping of AWM site sources is complete. Parcel polygon layer is ongoing.		Complete GIS mapping of current inventory to include polygon layer.	APN identification and parcel polygon layer map to be developed for current inventory. Map will have the capability of layering 303(d)/ESA onto the map.

¹³ R_{I+A} means that both the implementation and assessment result are the same.

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Table 5.17 – Program Implementation and Assessment Results for the AWM Stationary Commercial Sub-element (Level 1 Outcomes)

Outcome Level 1

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
<u>Identification of additional needed program modifications</u>		An annual review of <i>JURMP Section 7.2</i> and other ancillary program documentation was completed over the course of FY 2011-12 and during the development of this JURMP Annual Report (06-30-2012).			
☑ Source inventory updates		In accordance with <i>Permit Section D.3.a.(1)</i> , source inventories are reviewed and updated at least annually to ensure that they are current and complete, and that threat-to-water-quality prioritizations are correct. The County updated its inventory of AWM agricultural facilities on 6-30-12. This update is described in Table 5.2 and presented in Attachment 5.1.3 .			
<u>Facilitation Activities</u>		Facilitation activities are those which assist, encourage, or require changes in the knowledge or behaviors of the individuals and populations to which program activities are directed. Facilitation results for this element are described below.			
☑ Staff training		See Section 4.14.			
☑ Partnerships & collaboration		Partnerships allow the County to extend its influence with commercial facilities and operators through other parties such as professional and industry organizations. These groups often assist with outreach directly, or provide forums for County staff to conduct outreach or training to their members.			
5.2.6.4	Participate in USDA Local Workgroup (T = confirmation)	R _{I+A} = staff participated in workshop on 8-25-11 (confirmed)	Attend a USDA Local Workgroup	The San Diego County USDA Local Workgroup facilitates the Natural Resources Conservation Service sharing information on resources for agricultural businesses and land owners including the Farm Bill, grants, water & soil testing, irrigation audits, and BMPs.	
☑ AWM-AWQ website operation (T = confirmation)		(R _{I+A} = confirmation). The County continued to operate a AWM-AWQ website throughout the fiscal year. The website was operated and updated throughout the fiscal year by the department of AWM (http://www.sdcounty.ca.gov/awm/ag_water.html) to provide agricultural businesses with information regarding their regulatory requirements and resources and links for meeting them.			
☑ Education & outreach		Various outreach methods can be used to bring about changes in the knowledge or behaviors of commercial operators or employees. Outreach to these target audiences is both embedded in the inspection process and conducted independently through other means. Results are described below.			

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Outcome Level 1

Table 5.17 – Program Implementation and Assessment Results for the AWM Stationary Commercial Sub-element (Level 1 Outcomes)

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.6.5	Provide education to operators during all agricultural inspections (T = 182 inspections)	R _I = education provided during 182 inspections	R _A = 100 % complete	When appropriate provide education to operators during agricultural inspections	County AWM staff provided education during 182 inspections of stationary commercial facilities during FY 2011-12. Operators were provided information on WPO regulations, BMP requirements, and resources. Handouts were provided as appropriate. Worker training materials and annual review guidelines were distributed during inspections.
☑ Enforcement / return to compliance		Enforcement actions are used to require a return to compliance with applicable legal requirements. Each year, the County sets a target of correcting all instances of non-compliance observed during routine inspections. Success is measured as verification of a return to compliance or that a facility was working within established schedules to return to compliance.			
5.2.6.6	Correct all instances of non-compliance observed during site inspections (T = 35 inspections)	R _I = 35 facilities returned or on a schedule to return to compliance	R _A = 100 % complete	Correct all instances of non-compliance observed during site inspections	As in previous years, the County set a target of correcting all instances of non-compliance observed during routine inspections in FY 2011-12. In each instance, success was measured as verification of a return to compliance or that a facility was working within established schedules to return to compliance. As shown in Table 5.20 , 29 instances of non-compliance observed during routine inspections were corrected and 6 were on a schedule to achieve compliance at the time of completion of this annual report. Table 5.20 also provides summary information on enforcement actions associated with commercial facility site inspections, including numbers of violations, types of enforcement actions taken, and compliance status.

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Outcome Level 1

Table 5.17 – Program Implementation and Assessment Results for the AWM Stationary Commercial Sub-element (Level 1 Outcomes)

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.6.7	Correct all instances of non-compliance observed during complaint investigations (T = 9 complaints)	R _I = 9 sites returned or on a schedule to return to compliance	R _A = 100 % complete	Correct all instances of non-compliance observed during complaint investigations	The County set a target of correcting all instances of non-compliance observed during complaint investigations in FY 2011-12. As shown in Table 5.21 , of the 9 justified complaints, 8 instances of non-compliance were resolved and 1 is on a schedule to achieve compliance.
Feedback Activities Feedback Activities are conducted to determine whether and to what degree targeted changes are occurring in targeted staff. The implementation of feedback activities for this element is described below. Results of feedback obtained are provided in Table 5.22 .					
<input checked="" type="checkbox"/> Routine site inspections		Site inspections are used to verify compliance and to determine whether additional actions are required to correct non-compliance. Inspections typically consist of observations, record reviews, and sampling as needed. Site inspection results are described below.			
5.2.6.8	Inspect 100% of high threat agricultural facilities (T = 104 facilities)	R _I = 104 high-threat facilities were inspected	R _I = 100% complete	Inspect 100% of high threat agricultural facilities	Permit Section D.3.b.(3)(b) requires that the County inspect 100% of high threat sites during the second year of implementation of its updated JURMP. Summarized inspection results, including the total number of inventoried sources and inspections conducted for each business type and priority category, are presented in Table 5.19 . Detailed inspection results presented by facility in Attachment 5.3.3 .

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Table 5.17 – Program Implementation and Assessment Results for the AWM Stationary Commercial Sub-element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.6.9	Inspect 25% of agricultural facilities (T = 121 facilities)	R _I = 182 agricultural facilities were inspected	R _A > 100 % complete	Inspect 25% of agricultural facilities	<i>Permit Section D.3.b.(3)(c)</i> requires that the County inspect 25% of inventoried sites during the second year of implementation of its updated JURMP. The AWM work plan for FY 2011-12 was based on evaluating past inspection history of the inventory. Site selection for inspections was prioritized by new businesses never previously inspected, need for follow-up and/or re-inspections, history of non-compliances, and length of time since most recent inspections.
5.2.6.10	Re-evaluate the threat to water quality (TTWQ) for High & Medium sites visited in FY 2011-12.	R _I = 169 High & Medium TTWQ agricultural facilities were inspected and evaluated	R _I = 100% complete	Re-evaluate the threat to water quality (TTWQ) for High & Medium sites visited in FY 2012-13.	It is important that the TTWQ designation is accurate. Sites visited will be evaluated and designated threat will be changed when appropriate.
☑ Complaint investigations		Complaint investigations are similar to site inspections except that they are in response to reports of potential violations (e.g., through or complaints or staff referrals).			
5.2.6.11	Investigate all justified complaints received (T = 9 complaints)	R _I = 9 justified complaints investigated	R _A = 100% complete	Investigate all justified complaints received	During FY 2011-12, AWM staff responded to a total of 22 complaints/referrals involving commercial agriculture from citizens and other agencies. 9 of the 22 investigated by AWM proved to be justified. Attachment 5.4.2 provides detailed information on each complaint and provides summary information on pollutant types, enforcement actions, and compliance status.

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Table 5.17 – Program Implementation and Assessment Results for the AWM Stationary Commercial Sub-element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
5.2.6.12	Correct all instances of non-compliance observed during complaint investigations (T = 9 complaints)	R _I = 9 facilities returned or on a schedule to return to compliance	R _A = 100% complete	Correct all instances of non-compliance observed during complaint investigations	The County set a target of correcting all instances of non-compliance observed during complaint investigations in FY 2011-12. Nine Notices of Violation were issued to the 9 justified complaints; 8 returned to compliance and 1 is on a schedule to return to compliance.
☑ Surveys and special investigations		Special investigations are initiated to gather data or information to augment existing inspection and complaint investigation activities. They are usually of a limited focus and duration. In some cases, they are initiated in response to the findings of previous investigations. Special investigation results are described below.			
5.2.6.13	Conduct SKA survey at all inspected facilities when operator present (T = 168surveys)	R _I = Survey of 168 operators completed	R _A = 100% complete	Conduct SKA survey at all inspected facilities when operator present	A Stormwater Knowledge Assessment (SKA) survey was developed during FY 2007-08 as a means to evaluate agricultural operators' knowledge of stormwater concepts and issues. The survey guidelines are provided in Attachment 5.2.3 . Scores were recorded at all inspections that included contact with a responsible representative of the site. Survey results are discussed below under Level 2 Outcomes.
5.2.6.14	Survey pollution prevention practice implementation at agricultural sites during all inspections (T = 182 surveys)	R _I = 182 agricultural facilities surveyed	R _A = 100% complete	Survey pollution prevention practice implementation at agricultural sites during all inspections	The County Department of AWM surveys agricultural businesses during site inspections to assess pollution prevention practices and documents the types implemented at the sites. Practices that reduce, reuse, or recycle any of ten different identified materials/potential pollutants are documented. The ten materials include water, metal, green waste, manure, chemical, fertilizer, plastic, energy, oils, and anti-freeze. The survey is incorporated into the AWM Inspection Form and is presented as Attachment 5.2.2 . Survey results are given below under Level 3 Outcomes.

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Table 5.18 – Detailed Results of Outreach and Notification Activities for AWM Stationary Commercial Target Audiences

Date	Specific Audience	Audience Size	Location	Description
Presentations, Workshops, and Trainings				
8-27-11	Ag Producers/Nurserymen	90	San Diego	Water Quality BMPs
9-8-11	Ag Producers/Nurserymen	37	San Diego	Water School for Ag
9-21-11	Ag Producers/Nurserymen	52	Ramona	Water Quality Laws and Regulations
9-27-11	Ag Producers/Nurserymen	82	Escondido	Water Quality Laws and Regulations
10-18-11	Ag Producers/Nurserymen	41	San Diego	Water School for Ag
11-8-11	Ag Producers/Nurserymen	64	San Diego	Water School for Ag
12-3-11	Ag Producers/Nurserymen	36	San Diego	Water School for Ag
4-10-12	Ag Producers/Nurserymen	10	San Diego	Water School for Ag
5-18-12	Ag Producers/Nurserymen	115	San Diego	Spill Kits/Pest Management
5-26-12	Ag Producers/Nurserymen	64	Fallbrook	Ag/Animal Water Quality
5-29-12	Ag Producers/Nurserymen	50	Fallbrook	Water School for Ag

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Table 5.18 – Detailed Results of Outreach and Notification Activities for AWM Stationary Commercial Target Audiences

Date	Specific Audience	Audience Size	Location	Description
6-6-12	Ag Producers/Nurserymen	67	Valley Center	Water School for Ag/Irrigation Management
6-11-12	Ag Producers/Nurserymen	44	San Diego	Water School for Ag
Personal Visits				
FY 2011-12	Cemetery/Golf Course/ Parks/Irrigated Ag	27	Various	Visits focused on providing educational materials for the management of large landscaped areas.
Additional Resources and Displays				
FY 2011-12	All Ag Audiences and the Public	unknown	Escondido	Water Quality Kiosks are touch screen displays for self service. Kiosks have been placed at permanent locations and are available to the public at each location during regular business hours. Kiosk in Escondido is located at the office of the Farm Bureau in the lobby.
FY 2011-12	All Ag Audiences and the Public	unknown	San Marcos	Water Quality Kiosks are touch screen displays for self service. Kiosks have been placed at permanent locations and are available to the public at each location during regular business hours. A kiosk is available in San Marcos at the Office of the Farm and Home Advisor.
3-1-12 through 6-1-12	All Ag Audiences and the Public	60,000*est.	Carlsbad Flower Fields	Integrated Pest Management Kiosks were temporarily on display at the event. In addition, a mock “flower field” exhibit was installed at the Carlsbad Flower Fields demonstrating examples of 21 best management practices to protect water quality. Interpretive signs explained the purpose of each BMP on the exhibit.

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Table 5.18 – Detailed Results of Outreach and Notification Activities for AWM Stationary Commercial Target Audiences

Date	Specific Audience	Audience Size	Location	Description
6-15-12 Through 7-5-12	All Ag Audiences and the Public	30,000*est.	San Diego County Fair, Del Mar	In addition, a mock “flower field” exhibit was installed at the Garden Show at the San Diego County Fair demonstrating examples of 21 best management practices to protect water quality. Interpretive signs explained the purpose of each BMP on the exhibit.
Materials Distribution				
FY 2011-12	All Ag Audiences	3,970 (materials)	Varies	Materials included: Field Guides, Water Quality Education Packets, Turf Maintenance CDs, Pest Wheels, Pest Applicator brochures, and Spill Kits.
Outreach During Inspections				
FY 2011-12	Owners / operators of inventoried agricultural sites	182	Multiple	County AWM staff provided education during 182 inspections of stationary commercial facilities during FY 2011-12. Operators were provided information on WPO regulations, BMP requirements, and resources. Handouts were provided as appropriate. Worker training materials and annual review guidelines were distributed during inspections. Referrals to the Natural Resources Conservation Service were provided as needed.
Combined Outreach Totals				

Totals

94,931

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Table 5.19 – Summary of Facility Inspections for AWM Stationary Commercial Sources

Business Type	High Priority			Medium Priority			Low Priority			All Priorities		
	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected
Pest Control Services (headquarters)	4	4	100%	18	5	28%	22	0	0%	44	9	20%
Nurseries and Greenhouses	69	69	100%	223	59	26%	109	13	12%	401	141	35%
Golf Courses	27	27	100%	0	0	0%	0	0	0%	27	27	100%
Cemeteries	3	3	100%	1	1	100%	5	0	0%	9	4	44%
Other Agricultural Businesses	1	1	100%	0	0	0%	0	0	0%	1	1	100%
Totals	104	104	100%	242	65	27%	136	13	9%	482	182	38%

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Table 5.20 – Return to Compliance Statistics for AWM Stationary Commercial Facilities

Business Type	Inspection Results			Return to Compliance					
	Inspections Conducted	Observed Non-compliance		Enforcement Actions				Compliance Status	
		No. of Facilities	% of Facilities	Notices of Violation	Corrective Action Form	Re-Inspection	Admin. Citation Warning	Returned to Compliance	On a schedule to return to compliance
Pest Control Services (headquarters)	9	1	11%	1	0	1	0	1	0
Nurseries and Greenhouses	141	30	21%	30	0	9	0	27	3
Golf Courses	27	2	7%	2	0	1	0	1	1
Cemeteries	4	2	50%	2	0	0	0	0	2
Other Agricultural Businesses	1	0	0%	0	0	0	0	0	0
Totals	182	35	19%	35	0	11	0	29	6

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Table 5.21 – Summary Complaint Statistics for AWM Stationary Commercial Sources

Business Type	# Justified Complaints	Pollutant Type											Enforcement Actions				Compliance Status	
		Sediment	Concrete Waste	Manure	Nutrients	Sewage	Trash/Debris	Auto Fluids	Aqueous	Paint	Grease	Chemicals / Other	Verbal Warning/Advisory	Notices of Violation	Corrective Action Form	Re-Inspection	Returned to Compliance	On a schedule to return to compliance
Cemeteries	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Golf Courses	2	2	0	0	0	0	1	0	0	0	0	0	0	3	0	2	2	0
Nurseries/Greenhouses	6	1	0	0	0	0	1	0	5	0	0	0	1	5	0	5	5	1
Pest Control	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Irrigated Agriculture	1	0	0	0	0	0	0	0	1	0	0	0	0	1	0	1	1	0
Other Animal Facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Totals	9	3	0	0	0	0	2	0	6	0	0	0	1	9	0	8	8	1

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Table 5.22 – Assessment of Knowledge and Behavioral Outcomes for the AWM Stationary Commercial Sub-element (Level 2 and 3 Outcomes)

Outcome Levels 2 & 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
Outcome Level 2: Knowledge and Awareness				
5.2.6.15	All operators demonstrate at least a 70% understanding of SKA survey concepts (T = 168 operators)	R _I = 168 site operators had a 70% or greater understanding of stormwater runoff issues and regulations	R _A = 82.7% success	Operators demonstrate at least a 70% understanding of SKA survey concepts
<p>Results of the survey discussed in Table 5.17, showed that 168 of the 182 agricultural operators surveyed in FY 2011-12 scored 70% or better on the SKA survey. The average SKA survey score for operators in FY 2011-12 was 82.7%. This is comparable to results obtained in FY 2009-10 of 75.7%. The survey was designed to gauge the operator's awareness of stormwater pollution prevention and implementation of effective BMPs. The survey questions were as follows:</p> <ol style="list-style-type: none"> 1. Stormwater, storm drain system vs. sanitary sewer system. <ol style="list-style-type: none"> a. What is stormwater, the storm drain system and the sanitary sewer system? b. Where does the water flow? 2. Best Management Practices (BMPs) and good housekeeping. <ol style="list-style-type: none"> a. What are examples of BMPs at your site? b. What is the best way to store materials to prevent water pollution? 3. Pollutants: nutrients (fertilizers), pesticides, oil/fuel, trash/debris, manure, bacteria, sediment (erosion). <ol style="list-style-type: none"> a. What are some examples of water pollutants? b. Is sediment a pollutant? c. Is fertilizer a pollutant? 4. Clean Water Beneficial Uses: water supply, recreation (swimming, fishing etc) habitat preservation (fish, wildlife, etc). <ol style="list-style-type: none"> a. What are the benefits of clean water? b. Who benefits from clean stormwater runoff? 5. Legal requirements for water quality protection: Clean Water Act, NPDES (Municipal Permit), WPO, RWQCB, etc. <ol style="list-style-type: none"> a. What agencies regulate stormwater? b. What laws, regulations or permits govern stormwater? <p>The survey is described in Attachment 5.2.3.</p>				

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Table 5.22 – Assessment of Knowledge and Behavioral Outcomes for the AWM Stationary Commercial Sub-element (Level 2 and 3 Outcomes)

Outcome Levels 2 & 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
Outcome Level 3: Behaviors and BMP Implementation¹⁴				
☑ Administrative & Procedural Behaviors		Many types of administrative or procedural changes are necessary as a precursor to other specific targeted outcomes. Examples include development of stormwater pollution plans, changes to operating procedures, or staff training conducted by business operators.		
<u>Stormwater Pollution Prevention Plans (SWPPPs)</u>		<p><i>Permit Section D.3.b(2)(e)</i> requires that the County implement or require implementation of additional controls for sites tributary to CWA section 303(d)-listed water bodies (where the site generates pollutants for which the water body is impaired), and for sites within or directly adjacent to receiving waters within environmentally sensitive areas (ESAs). <i>WPO Section 67.808(b)(3)</i> allows regulators to require that regulated businesses which are determined to pose a significant threat to water quality implement additional controls as determined by the local enforcement official. AWM requires that regulated businesses which are tributary to an impaired water body segment or ESA must prepare and submit a SWPPP for approval. A target of 100% compliance has been established for this outcome.</p> <p>34 applicable sites were inspected during 2011-12 and were all provided with SWPPP guidance manuals and templates. The SWPPP template includes a spill response plan documentation form (see below).</p>		
5.2.6.16	100% of applicable facilities have a current, complete, site-specific SWPPP available for review (T = 34 facilities)	R _I = 26 applicable facilities had a current, complete, site-specific SWPPP	R _A = 76.5 % success	100% of applicable facilities have a current, complete, site-specific SWPPP, CWA section 303(d) and ESA training, and/or site specific spill response plan available for review

¹⁴ This analysis is based solely on the results of routine site inspections conducted by AWM staff described above. **Table 5.23** below also provides a multi-year comparison of inspection results.

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Table 5.22 – Assessment of Knowledge and Behavioral Outcomes for the AWM Stationary Commercial Sub-element (Level 2 and 3 Outcomes)

Outcome Levels 2 & 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
<u>Spill Response Plans</u>		<p><i>Permit Section D.3.b(2)(e)</i> requires that the County implement or require implementation of additional controls for sites tributary to CWA section 303(d)-listed water bodies (where the site generates pollutants for which the water body is impaired), and for sites within or directly adjacent to receiving waters within environmentally sensitive areas (ESAs). <i>WPO Section 67.808(b)(3)</i> allows regulators to require that regulated businesses which are determined to pose a significant threat to water quality implement additional controls as determined by the local enforcement official. AWM requires that regulated businesses which are tributary to an impaired water body segment or ESA must prepare and submit, for approval, a site-specific spill response plan that describes the areas where spills are likely to occur, the location of on-site storm drains and discharge points, the type and location of spill-response materials to be used, and the person(s) responsible for spill containment and cleanup. A target of 100% compliance has been established for this outcome because Spill Response Plans are a strict Permit requirement for applicable facilities.</p> <p>The AWM SWPPP template provided to agricultural facilities includes a spill response plan documentation form therefore compliance results for the spill response plan requirement is the same as reported above with SWPPP results.</p>		
5.2.6.17	100% of applicable facilities have a site-specific spill response plan (T = 34 facilities)	R _I = 26 facilities had a site-specific spill response plan	R _A = 76.5% success	100% of applicable facilities have a site-specific spill response plan
<u>Annual Facility Reviews</u>		<p><i>WPO Section 67.808(a)(3)</i> requires that businesses review the operations and procedures relating to protecting the stormwater conveyance system and receiving waters from pollutants at least annually. A target of 100% compliance has been established for this outcome because these reviews are a strict requirement for applicable facilities. Attachment 5.2.1 shows the standard annual review checklist form distributed to all agricultural facilities in FY 2011-12.</p> <p>During FY 2011-12, 160 facilities of 182 inspected produced documentation of a completed annual review.</p>		
5.2.6.18	100% of facilities have completed an annual review of operations and procedures (T = 182 facilities)	R _I = 160 facilities provided documentation of a completed annual review	R _A = 87.9% success	100% of facilities have completed an annual review of operations and procedures

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Table 5.22 – Assessment of Knowledge and Behavioral Outcomes for the AWM Stationary Commercial Sub-element (Level 2 and 3 Outcomes)

Outcome Levels 2 & 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
<u>Employee Training</u>		<p><i>WPO Section 67.808(a)(1)(A)</i> requires that businesses provide training at least annually to all operators, employees, and workers with responsibility for activities that could result in unauthorized discharges. A target of 100% compliance has been established for this outcome because these reviews are a strict requirement for applicable facilities.</p> <p>169 of the 248 facilities inspected had provided and documented annual training at time of inspection.</p>		
5.2.6.19	100% of facilities provide annual training to all operators, employees, and workers (T = 182 facilities)	R _I = 161 facilities provided annual training to all operators, employees, and workers	R _A = 88.4% success	100% of facilities provide annual training to all operators, employees, and workers
☑ Illicit Discharge Control		<p><i>WPO Section 67.804(a)</i> prohibits any person to discharge or cause the discharge of pollutants directly or indirectly into the stormwater conveyance system or receiving waters, unless exempted or otherwise authorized by law. Illicit discharges are defined as those that leave the site via driveways, brow ditches, on-site storm drains, etc. Spills confined to the site are addressed as violations under BMP Implementation or Spill Response. A target of 100% compliance has been established for this outcome because illicit discharge prohibitions are a strict Permit requirement.</p> <p>180 of the 182 inspected facilities did not have illicit discharge violations.</p>		
5.2.6.20	100% of inspected facilities do not have discharge violations (T = 182 facilities)	R _I = 180 inspected facilities did not have discharge violations	R _A = 98.9% success	100% of inspected facilities do not have discharge violations
☑ BMP Implementation		<p>Implementation of BMPs by facility operators is the most direct measure of successful program implementation. This category of outcomes is measured indirectly through compliance with regulatory requirements (i.e., a lack of observed violations during inspections). Results are described below.</p>		

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Table 5.22 – Assessment of Knowledge and Behavioral Outcomes for the AWM Stationary Commercial Sub-element (Level 2 and 3 Outcomes)

Outcome Levels 2 & 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
<u>Facilities with no BMP violations</u>		<p><i>WPO Sections 67.804 through 67.806 and 67.808</i> establish specific BMP standards and requirements applicable to commercial sites and sources. Compliance with these requirements was evaluated during facility inspections. Overall, 167 of the 182 inspected facilities were compliant with respect to implementation and maintenance of BMPs.</p> <p>A target of 50% compliance has been established for this outcome because annual inspections include both facilities previously inspected and newly inventoried ones. Of those facilities with one or more BMP violations, these typically included lack of proper material storage, erosion controls, or secondary containment.</p>		
5.2.6.21	50% of inspected facilities do not have BMP violations (T = 91 facilities)	R _I = 167 inspected facilities had no BMP violations	R _A > 100 % success	50% of inspected facilities do not have BMP violations
<u>Facilities with less than 3 BMP violations</u>		Only 7 of the 182 inspected facilities had more than two BMP violations at one inspection. While a rate of 75% was targeted, actual results showed that 96.1% of facilities had two or fewer BMP violations.		
5.2.6.22	75% of inspected facilities have two or less BMP violations (T = 137 facilities)	R _I = 175 facilities had two or less BMP violations	R _A > 100 % success	75% of inspected facilities have two or less BMP violations
<u>Facilities implementing pollution prevention (P2) practices</u>		<p><i>Permit Section D.3.b.(2)(a)</i> requires that the County require commercial operators to use pollution prevention (P2) methods where appropriate. WPO Section 67.808(a)(4) requires that businesses implement pollution prevention methods or those stormwater P2 practices that are generally recognized in that discharger's industry or business to eliminate or reduce pollutants in runoff to the MEP.</p> <p>Common agricultural industry P2 practices are recorded during site inspections on the facility compliance inspection reports. Attachment 5.2.2 presents the form.</p> <p>179 of the 182 inspected facilities in FY 2011-12 had at least one P2 practice in place.</p>		
5.2.6.23	50% of inspected facilities implement at least one pollution prevention practice (T = 91 facilities)	R _I = 179 inspected facilities implemented at least one pollution prevention practice	R _A > 100 % success	50% of facilities implement at least one pollution prevention practice

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Table 5.22 – Assessment of Knowledge and Behavioral Outcomes for the AWM Stationary Commercial Sub-element (Level 2 and 3 Outcomes)

Outcome Levels 2 & 3

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙
☑ Overall Regulatory Compliance (facilities with no violations)		This measure encompasses all potential violations of the WPO for commercial facilities. Since violations are often minor or administrative, some level of overall non-compliance is reasonably expected each year. During FY 2011-12, 147 of 182 inspected agricultural facilities were in compliance with all stormwater regulations at the time of inspection.		
5.2.6.24	50% of inspected facilities do not have any violations (T = 91 facilities)	R _I = 147 facilities had no violations	R _A > 100 % success	50% of inspected facilities do not have any violations

Table 5.23 – Multi-year Comparison of Behavioral Outcomes for AWM Stationary Commercial Operators

Targeted Behaviors	Percent of Sites Without Violation Type at Initial Inspection								
	Targeted Percentage	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12
A. Administrative and Procedural Behaviors									
1. Applicable facilities have a current, complete, site-specific SWPPP available for review	100%	NA ¹⁵	NA	NA	NA	100%	90%	95.4%	76%
2. Applicable facilities have a site-specific spill response plan	100%	NA	NA	NA	94%	100%	90%	95.4%	76%
3. Applicable facilities have completed an annual review of operations and procedures	100%	NA	NA	NA	66%	68%	87%	94.8%	88%

¹⁵ NA is not applicable. Data was not collected in a way to be able to determine these values.

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Table 5.23 – Multi-year Comparison of Behavioral Outcomes for AWM Stationary Commercial Operators

	Percent of Sites Without Violation Type at Initial Inspection								
Targeted Behaviors	Targeted Percentage	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12
4. Facilities have provided annual training to all operators, employees, and workers	100%	NA	NA	68%	59%	65%	78%	68.1%	88%
B. Illicit Discharge Control									
5. Inspected facilities do not have discharge violations	100%	NA	NA	95%	80%	85%	93%	93.9%	99%
C. BMP Implementation									
6. Inspected facilities do not have BMP violations	50%	NA	NA	73%	59%	66%	78%	79.0%	92%
7. Inspected facilities have two or less BMP violations	75%	NA	NA	NA	NA	93%	91%	88.0%	96%
8. Applicable facilities implement at least one pollution prevention practice	90%	NA	NA	NA	35%	52%	81%	86.0%	98%
D. Overall Regulatory Compliance									
9. Inspected facilities do not have any violations	50%	38%	49%	56%	31%	37%	63%	54.0%	81%

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5.3 Mobile Sources Element

The County's implementation and assessment strategy for mobile sources is described in *JURMP Section 7.3.4*. **Figure 5.4** also provides an overview of the major elements of this strategy as it was implemented during FY 2011-12. Specific targeted outcomes and results for each type of activity are presented in **Table 5.24**.




Mobile Commercial Businesses Sub-element			
Program Implementation  <ul style="list-style-type: none"> - DPW Watershed Protection - AWM WQP 	Target Audiences  <ul style="list-style-type: none"> - Mobile Business Owners, Operators, Employees 		Sources  <ul style="list-style-type: none"> - Misc. Mobile Commercial Businesses (see inventory, Attachment 5.1.4)
OUTCOME LEVEL 1	OUTCOME LEVEL 2	OUTCOME LEVEL 3	OUTCOME LEVEL 4
Stormwater Program Activities	Knowledge & Awareness	Behaviors	Source Reductions
<u>Program Administration</u> <input checked="" type="checkbox"/> Program reviews & updates <input checked="" type="checkbox"/> Source inventory updates <input checked="" type="checkbox"/> Staff training <u>Facilitation Activities</u> <input checked="" type="checkbox"/> Partnerships & collaboration <input checked="" type="checkbox"/> Education & outreach <input checked="" type="checkbox"/> Enforcement / return to compliance (See Table 5.24 for Level 1 Results)	<input checked="" type="checkbox"/> Not Targeted or Assessed <input checked="" type="checkbox"/> Not Targeted or Assessed		<input checked="" type="checkbox"/> Not Targeted or Assessed

Figure 5.4 – FY 2011-12 Implementation and Assessment Strategy for the DPW Mobile Commercial Sub-element

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Table 5.24 – Program Implementation and Assessment Results for the Mobile Commercial Sub-element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
<u>Program Administration</u>		A variety of administrative activities are necessary to support the operation and management of this element of the County's stormwater program. These are described below.			
☑ Program reviews & updates		Throughout each fiscal year, County staff provides a thorough review of all elements of its JURMP and ancillary program materials to determine whether modifications are necessary. See Table 5.27 for an updated list and schedule of modifications.			
<u>Completion of identified program modifications</u>		The status of program modifications identified in last year's JURMP Annual Report is described below.			
5.3.1	Not targeted	Not assessed		Not targeted	During FY 2011-12, changes to JURMP Section 7.3 and ancillary program documents for mobile business activities were not identified.
5.3.2	Not targeted during FY 2011-12	Not assessed		Promote use of on-line resources	A Stormwater BMP Tool Box has been developed by the Copermittees for use on-line by all operators in the region and is posted on the Project Clean Water website as a handy link. The County will continue to manage and improve the BMP pages, including those for mobile businesses. This effort is underway and will be carried through FY 2012-13.
<u>Identification of additional needed program modifications</u>		An annual review of JURMP Section 7.2 and other ancillary program documentation was completed. A comprehensive review was performed during the development of this JURMP Annual Report. No additional modifications are necessary at this time.			
☑ Source inventory updates (T = completion)		Permit Section D.3.b.(1) requires that each Copermittee keep as part of its commercial sources inventory a listing of mobile businesses known to operate within its jurisdiction, and Section D.3.b.(4)(b) encourages Copermittees to share these inventories. Through its participation in the Copermittee Mobile Business sub-workgroup, the County mobile business inventory had been updated in FY 2010-11 and is stored in an internet-based database accessible to all Copermittees. In FY 2011-12, the County continued to refine the database. The inventory is presented in Attachment 5.1.4 ; mobile headquarters are also included in the stationary commercial inventory.			
<u>Facilitation Activities</u>		Facilitation activities are those which assist, encourage, or require changes in the knowledge or behaviors of the individuals and populations to which program activities are directed. Facilitation results for this element are described below.			
☑ Staff training		See Section 4.14.			

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Table 5.24 – Program Implementation and Assessment Results for the Mobile Commercial Sub-element (Level 1 Outcomes)

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
☑ Partnerships & collaboration		Partnerships allow the County to extend its influence with commercial facilities and operators through other parties such as professional and industry organizations. These groups often assist with outreach directly, or provide forums for County staff to conduct outreach or training to their members.			
5.3.4	Not targeted	Not assessed		Not targeted	
☑ Education & outreach		Various outreach methods can be used to bring about changes in the knowledge or behaviors of commercial operators or employees. Outreach to these target audiences is both embedded in the inspection process and conducted independently through other means. Results are described below.			
5.3.5	Provide education to operators during all headquarters inspections and justified complaint investigations (T = 32 operators)	R _I = education provided to 32 operators	R _A = 100% complete	Provide education to operators during all inspections and complaint investigations	During headquarters inspections (n = 25) or complaint investigations (n = 7), DPW staff discussed water quality, stormwater protection, and BMP requirements with the operators. Appropriate BMP fact sheets were also distributed. Finally, for the complaint investigation, the HQ address and other contact information were obtained for inventory purposes.
☑ Enforcement / return to compliance		Enforcement actions are used to require a return to compliance with applicable legal requirements. Each year, the County sets a target of correcting all instances of non-compliance observed during investigations. Success is measured as verification of a return to compliance or that a facility was working within established schedules to return to compliance.			

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**Table 5.24 – Program Implementation and Assessment Results for the Mobile Commercial Sub-element
(Level 1 Outcomes)**

Outcome Level 1

FY 2011-12 Targets (T) ⊙		Implementation Result (R _I) ☑	Assessment Result (R _A) ⊞	Next Fiscal Year Targets ⊙	Explanation 📄
5.3.6	Correct all instances of non-compliance observed during headquarters inspections (T = 15 instances)	R _I = 15 mobile businesses returned or on schedule to return to compliance	R _A = 100% complete	Correct all instances of non-compliance observed during HQ inspections	<i>Permit Section D.3.b.(4)(a)ii</i> requires that the County develop and implement an enforcement strategy which specifically addresses the unique characteristics of mobile businesses operating within its jurisdiction. <i>Section D.3.b.(4)(a)v</i> further requires that the County conduct inspections of mobile businesses as needed (e.g., on a complaint basis). During FY 2011-12, 25 mobile business headquarter inspections were conducted, and all 15 mobile business headquarters with violations returned to compliance. Attachment 5.3.2 provides summary statistics for the mobile business headquarter inspections and shows their status of resolution.
5.3.7	Correct all instances of non-compliance observed during complaint investigations (T = 4 instances)	R _I = 4 mobile businesses returned or on schedule to return to compliance	R _A = 100% complete	Correct all instances of non-compliance observed during complaint investigations	During FY 2011-12, four justified complaints were received for mobile businesses by DPW and none from AWM. The four cases returned to compliance.

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Table 5.25 – Summary Complaint Statistics for Mobile Sources

		Pollutant Type											Enforcement Actions				Compliance Status	
Business Type	# Justified Complaints	Sediment	Concrete Waste	Manure	Nutrients	Sewage	Trash/Debris	Auto Fluids	Aqueous	Paint	Grease	Chemicals / Other	Advisory	Corrective Action Form	Re-Inspection	Admin. Citation Warning	Returned to Compliance	On a schedule to return to compliance
Dept. of Public Works (DPW)	4	0	0	0	0	0	0	1	3	0	0	0	4	0	0	0	4	0
Dept. of Agriculture, Weights, and Measures (AWM)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Totals	4	0	0	0	0	0	0	1	3	0	0	0	4	0	0	0	4	0

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5.4 Industrial and Commercial Component Effectiveness Assessment (Cumulative Results for All Industrial and Commercial Sources)

This section presents the results of implementing program activities that apply to multiple elements or sub-elements of the Industrial and Commercial Component. In particular, it summarizes and combines results provided elsewhere in this chapter for business notifications and inspections conducted during FY 2011-12.

5.4.1 Business Notifications

Permit Section D.3.b.(2)(c) requires that the County, within the first three years of implementation of its updated JURMP (i.e., no later than March 24, 2011), notify each industrial facility owner / operator of the BMP requirements applicable to that source. As reported in the September 2011 Annual Report, operators of existing stationary industrial and commercial facilities were notified in FY 2010-11. In FY 2011-12, operators of new stationary sites were notified during the initial inspection/investigation. Similarly, *Permit Section D.3.b.(4)(a)* requires BMP notification of mobile businesses after the listing has been established. The County revised listing was established in FY 2010-11, and the notification mail-outs were sent during that period. In FY 2011-12, the County provided BMP notifications to new mobile businesses as it became aware of them through complaint investigations or field contact.

Permit Sections D.3.b.(3)(b) and (c) require that the County inspect 100% of high priority and 25% of the total stationary industrial and commercial sources in its inventory. The County has complied with this inspection frequency in addition to its other compliance targets.

Inspection results for FY 2011-12 are provided individually by program sub-component in **Sections 5.2.4 through 5.2.6**. **Table 5.26** summarizes results across all industrial and stationary commercial sources in the County inventory. As shown, the County conducted 349 inspections or 100% of all high priority TTWQ industrial and commercial sources during FY 2011-12, and 209 additional inspections of medium and low TTWQ sources, altogether representing 26.5% of its entire inventory. As shown, the County continued to meet its Permit obligations for business inspections during FY 2011-12.

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Table 5.26 – Stationary Facility Inspection Results for FY 2011-12

Business Type	High Priority ¹⁶			Medium Priority			Low Priority			All Priorities		
	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected	No. Facilities	No. Inspected	% Inspected
DPW Industrial	75	80	100%	58	7	12.1%	48	0	0.0%	181	87	48.0%
DPW Commercial	162	165	100%	766	94	12.3%	511	30	5.9%	1439	289	20.1%
AWM Commercial	104	104	100%	242	65	27%	136	13	9%	482	182	38%
Totals	341	349	100%	1066	166	15.6%	695	43	6.2%	2102	558	26.5%

¹⁶ *No. of Facilities* indicates the inventory number as of July 1, 2011

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5.5 Program Review and Modification

In accordance with *Permit Section I.1.b*, the County has reviewed the results of its JURMP effectiveness assessment and other relevant information to identify modifications needed to maximize JURMP effectiveness and achieve compliance with *Permit Section A*. **Table 5.27** identifies planned modifications and improvements to the Industrial and Commercial JURMP Component and estimated schedules for their completion.

Table 5.27 – Planned Modifications to the Industrial and Commercial JURMP Component

Target Date	JURMP Section(s)	Planned Modification(s)
A. JURMP Modifications		
TBD	TBD	Changes recommended in the FY 2009-10 Annual Report were reviewed again in FY 2011-12 but were not substantial enough to warrant a JURMP update at this time. The recommendations will be reconsidered after the reissuance of the MS4 Permit.
B. Ancillary Program Documentation		
12-31-2012		Refine GIS mapping applications utilizing 2010 SWRCB shape-files for identifying potential ESA or 303(d) facilities.
06-30-2013		Revise manager reports for Accela data management system to facilitate data retrieval and reporting.
06-30-2013		Migrate DPW inspection and inventory data to Accela and refine processes, as needed.