

C-10.0 ILLEGAL DISCHARGES/ILLICIT CONNECTIONS

C-10.1 Introduction

Illegal discharges/illicit connections are potential sources of pollutants within municipal storm drain systems. For example, in the pre-amble to the federal stormwater regulations, USEPA noted that many studies had shown that storm drains contained illegal discharges and large amounts of wastes, particularly used oil, that were improperly disposed in storm drains. It was also noted by USEPA that the removal of these discharges presented *opportunities for dramatic improvements in the quality of stormwater discharges* (p. 47992 Federal Register Vol. 55. No. 222, November 16, 1990).

The objectives of the Illegal Discharges/Illicit Connections (ID/IC) program component are to effectively prohibit and respond to the discharge of non-stormwater into the municipal stormdrain system.

C-10.2 Program Development

The Third Term Permits require the development and implementation of a comprehensive Illegal Discharges/Illicit Connections Program. The current revised program includes the following:

- Development of criteria for municipal follow-up inspections;
- Development of guidelines for establishing a Criminal Citation Program;
- Prohibition of illicit connections with permitting and/or elimination within 120 days;
- Continued enforcement actions against violators of Water Quality Ordinance to eliminate illicit connections and illegal discharges;
- Increased response to sewage spills;
- Continued notification to Regional Board staff regarding potential violations at State permitted sites;
- Providing written and oral reports to the Regional Boards; and
- Development of a long-term strategy for assessing program effectiveness.

C-10.3 Illicit Connections

As part of the Orange County Stormwater Program, each Permittee detects and eliminates illicit connections within its municipal storm drain system. Any illicit connection identified by the Permittees during routine inspections is investigated. Appropriate actions are then taken to approve undocumented connections by permit procedure and/or pursue removal of those connections that are determined to be illicit connections and not permissible.

If evidence of an illegal discharge is detected and the source does not appear to be evident a source investigation may be conducted to determine if the discharge is being conveyed through an illicit connection.

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Depending on the type of illicit connection detected, the Permittees will eliminate connections by means of appropriate legal procedures. Follow-up will be conducted to ensure that abatement activities have been successfully and adequately implemented.

Compliance with established regulations on obtaining encroachment permits before installation of drains is enforced by the Permittees. Owners of existing drains without appropriate permits are notified to comply. For those drains where the owner is unresponsive or cannot be identified, each Permittee is responsible for deciding whether to formally accept the connection as part of their public drainage system or cap it off.

Illicit connection findings for each Permittee are included in their respective PEAs.

C-10.4 Detection/Elimination of Illegal Discharges

The Permittees have a number of programs that facilitate the detection of sources of illegal discharges. These programs include industrial facility inspections, drainage facility inspections, water quality monitoring, and the wide distribution of public education materials that provide phone numbers and web addresses to encourage the reporting of spills.

Through routine maintenance activities within the municipal storm drain system, Permittee field personnel continue to report suspected problems and/or discharges to the storm drain system. In addition to inspection, the Permittees receive notifications from various other sources such as the public and regional and/or local agencies.

For the 2004-05 reporting period, the Permittees received 1,539 complaints/incidents from city staff, 291 from other agencies such as the Regional Board, 563 from the water pollution hotline, 776 from the public, 74 from businesses and 165 from other sources. Therefore, 44% of the complaints/incidents came from city staff, 9% from other agencies, 17% from the water pollution hotline, 23% from the public, 2% from businesses and 5% from other sources.

For the 2003-04 reporting period, the Permittees reported 2,230 complaints/incidents from city staff, 297 from other agencies such as the Regional Board, 243 from the water pollution hotline, 834 from the public, 129 from businesses and 104 from other sources. Therefore, 58% of the complaints/incidents came from city staff, 8% from other agencies, 6% from the water pollution hotline, 22% from the public, 3% from businesses and 3% from other sources.

For the 2002-03 reporting period, the Permittees reported 458 complaints/incidents from city staff, 59 from other agencies such as the Regional Board, 121 from the water pollution hotline, 868 from the public, 92 from businesses and 23 from other sources. Therefore, 28% of the complaints/incidents came from city staff, 4% from other agencies, 7% from the water pollution hotline, 54% from the public, 6% from businesses and 1% from other sources.

See **Table C-10.1** and **Figure C-10.1** for a comparison of this information.

Headline Indicator - Number of Complaints: *The Permittees reported a total of 3,408 complaints/incidents during the 2004-05 reporting period. This total represents an 11% decrease from 2003-04, a 110% increase from 2002-03, and a 140% increase from 2001-02. The 2003-04 comparison suggests inconsistent reporting of this indicator or a marked variability in the number of incidents occurring; however, the proportions of the sources of complaints/incidents reported remain relatively consistent throughout the permit term.*

Enforcement activities are undertaken according to the Water Quality Ordinance and accompanying Enforcement Consistency Guide. Water pollution cases may be handled administratively, or in more serious instances, have been prepared for prosecution by the Orange County District Attorney who may prosecute under the applicable sections of the Water Quality Ordinance, State Fish and Game Code, State Water Code, Uniform Fire Code, and Penal Code that address pollutant discharges.

Commencing with the 1999-00 reporting period, the Permittees began to provide a summary of the enforcement actions that have been taken against offenders within their jurisdiction. This information includes the types and total numbers of the various enforcement actions that have been taken against the violators, the number of repeat violators and the incremental enforcement actions taken against them, and additional information regarding any prosecutions that are either currently underway or that have been settled.

For the 2004-05, reporting period, the Permittees reported issuing 715 educational letters, 845 notices of non-compliance, 110 administrative compliance orders, 49 cease and desist orders, two misdemeanor/infraction, 368 citations, and 1,439 other types of enforcement tools. Therefore, 20% of the enforcement actions were in the form of an educational letter, 24% in the form of a notice of non-compliance, 3% in the form of an Administrative Compliance Order, 1.3% in the form of a Cease and Desist Order, 0.03% in the form of a Misdemeanor, 0.03% in the form of an Infraction, 10% in the form of a citation, and 41% were in the form of other types of enforcement tools, such as a verbal warning.

In 2003-04, 1,460 educational letters, 1,502 notices of non-compliance, 544 administrative compliance orders, 36 cease and desist orders, 74 misdemeanor s/infractions, 96 citations, and 639 other types of enforcement tools were issued. Therefore, 34% of the enforcement actions were in the form of an educational letter, 34% in the form of a notice of non-compliance, 12% in the form of an Administrative Compliance Order, 0.8% in the form of a Cease and Desist Order, 0.02% in the form of a Misdemeanor, 1.6% in the form of an Infraction, 2.2% in the form of a citation, and 15% were in the form of other types of enforcement tools, such as a verbal warning.

In 2002-03, 600 educational letters, 675 notices of non-compliance, 327 administrative compliance orders, 16 cease and desist orders, 4 misdemeanors/infractions, 34 citations, and 511 other types of enforcement tools were issued. Therefore, 28% of the enforcement actions were in the form of an educational letter, 31% in the form of a notice of non-compliance, 15% in the form of an Administrative Compliance Order, 0.7% in the

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form of a Cease and Desist Order, 0.2% in the form of a Misdemeanor, 1.6% in the form of a citation, and 23% were in the form of other types of enforcement tools, such as a verbal warning.

See **Table C-10.2** and **Figure C-10.2** for a comparison of this information.

Headline Indicator – Number and Level of Enforcement Actions: *The Permittees reported a total of 3,528 enforcement actions during the 2004-05 reporting period. This represents an 18.9% decrease from the total reported in 2003-04, an increase of 63% from the total reported 2002-03, and an increase of 235% from the total reported in 2001-02. The 2004-05 data is consistent with the decrease in the number of complaints received. When compared with 2003-04, however, the proportions of how enforcement actions are administered remains relatively consistent throughout the permit term, with an apparent trend of issuing fewer educational letters and administrative compliance orders in favor of increased verbal warnings followed by issuance of citations.*

Different types of materials were encountered during the reporting period in response to complaints and incidents. During the 2004-05 reporting period, the Permittees encountered 296 hydrocarbon, 264 inorganic, 6 metal, 43 nutrient, 73 organic, 133 discharge exceptions, 156 pathogens, 624 wastewater, 2 pesticide, 680 sediment, 376 trash and debris, and 716 miscellaneous types of materials for a total 3,369 types of materials. For the 2003-04 reporting period, 226 inorganic, 326 paint, 520 petroleum product, 235 sewage, 2,161 miscellaneous, and 139 unidentified spills and complaints were addressed by the Permittees. Since this is the first year that the program has used these specific categories no comparative data is available (**Table C-10.3**).

10.4.1 Tustin Area Spill Control Demonstration (TASC) Project

During the reporting period, the County and Orange County Sanitation District continued coordinating a sewage spill prevention and response demonstration project. The project is called the “Tustin Area Spill Control (TASC) Demonstration Project”. Major tasks completed during this reporting period are as follows:

- Development of sanitary sewer overflow (SSO) response procedures
- Selection of primary and backup sewage spill response contractors for containment and recovery of SSOs
- Conducted SSO hands-on field response training for Permittee staff and municipal sewerage agency staff

Additional details of above accomplishments and other tasks are presented in **Attachment C-3.1** of this report.

C-10.5 ID/IC Dry Weather Monitoring

Dry weather monitoring programs were developed for both permit regions as detailed in **Section 11, Water Quality Monitoring**, of the 2003 DAMP. The intent of these

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programs is to enable the municipalities to better identify and respond to illegal discharges and illicit connections during the typically dry summer months of May through September using a suite of water quality analyses conducted in the field at designated random and targeted drains. The 2004-05 reporting period marked the third season of dry weather monitoring in the San Diego Region. With the approval of the Santa Ana Monitoring Program in July of 2005 by the Executive Officer of the Santa Ana Regional Board, dry weather monitoring in the Santa Ana Region will commence in May of 2006.

During the reporting period, the following notifications of illegal discharges were made from the field by monitoring staff to city authorized inspectors:

Drain	Date	Watershed	Reason for Notification	City Notified
SJCL01S02	July 23, 2004	San Juan Creek	Soap Suds Visible	San Juan Capistrano
LNK01S01	May 18, 2005	Dana Point Coastal Streams	High Turbidity (4,260 NTU)	Dana Point & Laguna Niguel
LNL03P37	May 24, 2005	San Juan Creek	High Surfactants (4.5 mg/L)	Mission Viejo
MVL02P20	June 14, 2005	San Juan Creek	High Surfactants (38.8 mg/L)	Mission Viejo

For a complete discussion on results of the San Diego Region Dry Weather Monitoring Program, please see **Section C-11** of this Unified PEA. The individual jurisdictional PEAs should be consulted for information on city responses to these discharge notifications.

C-10.6 Program Training and Outreach

To assist responsible municipal staff in understanding the Illegal Discharges/Illicit Connections Program training modules have been developed. New modules are developed and existing modules are refined as needed annually. The list of seven current modules along with their descriptions is presented below:

Program Management Training - Introductory (DAMP Appendix B Exhibit B-10.I-A)

This training module is targeted towards new stormwater program managers and addresses the overall program framework, objectives and approach. Its goal is to help program managers gain a broader understanding of how the program is developed and implemented at a local level. It also includes the tools necessary to: determine program responsibilities, conduct investigations, implement proper enforcement procedures and report incidents of non-compliance.

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This module was presented on September 30, 2004 in the City of Irvine. Twenty-eight (28) staff members from fifteen (15) Permittees attended the training.

Program Management Training - Experienced (DAMP Appendix B Exhibit B-10.I-B)

This training module is generally targeted for experienced stormwater program managers and provides an annual refresher on the overall program framework, objectives and approach so that the managers understand how the program is implemented and reported on at a local level. It also includes information on the goals, objectives and information needs for the Program Effectiveness Assessment.

Authorized Inspector Training (DAMP Appendix B Exhibit B-10.II)

During the 2004-05 reporting period, this module was modified and divided into two modules. The introductory module (II-A) addresses the responsibilities of field personnel implementing the ID/IC Program. The second part (II-B) of this module addresses the basic field program requirements and provides detailed instruction on conducting inspections.

Authorized Inspector Training - Introductory ((DAMP Appendix B Exhibit B-10.II-A)

This training module is targeted towards new authorized inspectors, spill responders and/or code enforcement officers and addresses the responsibilities of field personnel implementing the ID/IC Program. Its goal is to help staff understand Authorized Inspector reporting requirements, spill response, inspection, clean-up and enforcement procedures.

The introductory module was presented on March 24, 2005. in the City of Irvine. Thirty (30) staff members from seventeen (17) Permittees attended the training.

Authorized Inspector – Field Implementation (DAMP Appendix B Exhibit B-10.II-B)

This training module is targeted towards authorized inspectors, spill responders and/or code enforcement officers and addresses the responsibilities of the field personnel implementing the ID/IC Program. This training module helps staff understand various difficult field situations that may be encountered by providing visual examples and explanations of BMP implementation, previous inspections and water pollution complaints/spill incident responses. More specifically, it addresses these issues using “hands-on” case specific information and encourages exchange of experience and insight among inspectors/responders.

The field module was presented on June 30, 2005 in the City of Irvine. Forty-seven staff members from twenty-three (23) Permittees attended the training.

Sewage Spill Response Training (DAMP Appendix B Exhibit B-10.III)

During the 2004-05 reporting period, this module was modified and divided into two modules. The introductory module (III-A) addresses the responsibilities of field

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personnel implementing the ID/IC Program in a classroom setting. Part two (III-B) of this module addresses the same basic field program requirements but also incorporates a field exercise.

Sewage Spill Response Training - Introductory (DAMP Appendix B Exhibit B-10.III-A)

This training module is targeted towards municipal authorized inspectors or spill responders as well as sanitation/sanitary district and city utility staff responsible for responding to sewage spills and specifically focuses on the responsibilities of the field personnel in responding to sanitary sewer overflows (SSOs). The training addresses a sewage spill from both the sanitation and municipal stormwater perspective and provides a framework for responders to follow to ensure that both sets regulatory requirements are met. This module stresses the importance of inter-agency coordination, sanitary sewer overflow response plan and notification and reporting requirements.

This module was presented on August 12, 2004 at the Inspection Sub-committee meeting. Thirty-four (34) staff members from seventeen (17) Permittees attended the training session.

"Hands-On" Sewage Spill Response Training - Experienced (DAMP Appendix B Exhibit B-10.III-B)

This training module targeted towards experienced municipal authorized inspectors and spill responders as well as sanitation district staff and contains a slightly abbreviated classroom module combined with a field exercise. The field exercise simulates an SSO releasing from a manhole and participants practice various aspects of responding to an SSO including communications, containment, recovery, reporting and notifications.

This module was presented on August 12, 2004 at the Authorized Inspectors meeting. Thirty-four (34) staff members from seventeen (17) Permittees attended the training session. The updated module was presented on October 7, 2004 and April 19, 2005 at the Orange County Sanitation District training center. Four-five (45) staff members from thirteen (13) Permittees attended the October training. Twenty-four (24) staff members from sixteen (16) Permittees attended the April training.

Fire Department Activities Training (DAMP Appendix B Exhibit B-10.IV)

This training module was developed as a train the trainer module and is targeted towards fire department personnel. The module provides an overview of the ID/IC program framework and focuses on fire department personnel responsibilities in implementing BMPs during non-emergency activities. In addition, the module also provides BMP guidance during various types of emergency incidents.

This module was presented on February 24, 2005 in the City of Irvine. Twelve (12) staff members from eleven (11) Permittees attended the training session.

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Investigative Guidance Manual Training (DAMP Appendix B Exhibit B-10.V)

This training module is targeted towards authorized inspectors, spill responders and/or code enforcement staff responsible for responding to and investigating illegal discharges. The module provides detailed instruction on the use of the Model Investigative Guidance Manual and addresses: fundamental techniques necessary for conducting legally defensible investigations, investigative procedures, environmental sampling, photographs, and enforcement. This module was conducted in a “hands-on” format which allows the attendees to participate in exercises for record keeping, hazards identification, environmental sampling, photography and enforcement.

This module was presented on April 25, 2005 in the City of Irvine. Forty-four (44) staff members from twenty-eight (28) Permittees attended the training session.

NPDES Inspection Sub-Committee

In addition to the training modules, the NPDES Inspection Sub-Committee also provided training on various subjects relevant to the ID/IC program.

This sub-committee met bi-monthly to provide training to municipal inspectors and Authorized Inspectors in issues related to spill response, inspection and enforcement. In addition, this meeting serves as a forum for the coordination and discussion of ongoing difficult or new enforcement, investigation, or enforcement issues and to profile cases or incidents.

During the reporting period, the following training was provided to the NPDES Inspection Sub-committee:

- August 12, 2004 - ID/IC Module III
- October 14, 2004 - Emergency Response - Gasoline Spill
- December 9, 2004 - Clandestine Labs Inspector Awareness
- February 10, 2005 - Inspector Awareness Hostile Situations
- April 14, 2005 - Industrial Inspections Training - RWQCB Perspective
- June 9, 2005 - Dry Weather Monitoring Training

Individual Permittee attendance records can be found in Section 10.5 of each of the respective Permittee’s PEA.

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Table C-10.1: Source of Complaints/Incidents, Comparison of 2002-03, 2003-04, and 2004-05

PERMITTEE	City Staff	City Staff	City Staff	Other Agencies	Other Agencies	Other Agencies	Hotline	Hotline	Hotline	Public	Public	Public	Busin-esses	Busin-esses	Busin-esses	Other	Other	Other	TOTAL	TOTAL	TOTAL
	2002-03	2003-04	2004-05	2002-03	2003-04	2004-05	2002-03	2003-04	2004-05	2002-03	2003-04	2004-05	2002-03	2003-04	2004-05	2002-03	2003-04	2004-05	2002-03	2003-04	2004-05
Aliso Viejo	21	38	11	2	3	2	6	4	7	2	12	15	4	3	2	0	0	0	35	60	37
Anaheim	34	117	156	3	45	2	0	95	56	19	0		0	26	13	0	0		56	283	227
Brea	NA	3	8	NA	1	20	NA	0	10	NA	0	16	NA	0		NA	0		NA	4	54
Buena Park	5	8	24	1	5	3	0	0	0	4	28	35	0	0	1	0	0	0	10	41	63
Costa Mesa	2	21		0	0	14	10	0		286	27	18	70	14		10	90		378	152	32
Cypress	5	18	14	0	2	3	11	0	7	1	10	7	0	3	4	0	0		17	33	35
Dana Point	NA	2	24	NA	13	7	NA	2	6	NA	12	33	NA	0	3	NA	6		NA	35	73
Fountain Valley	29	50	47	5	2	2	16	6	11	8	1	2	0	0		0	0		58	59	62
Fullerton	51	43	1	0	0		0	0		26	30	2	0	0		0	0		77	73	3
Garden Grove	26	15	208	2	5	41	4	10	2	19	84	89	3	6	12	0	0		54	120	352
Huntington Bch	108	387	140	9	11	10	9	0	0	323	51	59	9	1	1	0	0	0	458	450	210
Irvine	32	61	49	4	96	79	0	0	0	33	31	64	0	0	0	0	0		69	188	192
La Habra	0	6	32	0	0	1	0	0		21	19		0	0		0	0		21	25	33
La Palma	27	69	53	1	0	0	1	2	0	4	25	13	0	0	1	0	0	0	33	96	67
Laguna Beach	25	25	23	4	13	13	56	66	55	0	0	0	0	0	0	0	0	0	85	104	91
Laguna Hills	7	11	20	0	1	2	0	1	0	7	0	0	1	0	0	0	0	0	15	13	22
Laguna Niguel	NA	18	14	NA	1	6	NA	2	3	NA	10	2	NA	0	1	NA	0	0	NA	31	26
Laguna Woods	12	13	84	6	1	8	0	0	0	22	65	18	0	3	10	0	0	0	40	82	120
Lake Forest	2	27	35	4	6	16	0	3	3	11	16	44	0	2	7	0	0	0	17	54	105
Los Alamitos	0	0	0	1	12		0	3	0	2	0	0	0	0	0	0	0		3	15	0
Mission Viejo	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	111	NA	NA	0	NA	NA	0	NA	NA	111
Newport Beach	NA	NA	100	NA	NA	5	NA	NA	30	NA	NA	60	NA	NA	10	NA	NA	95	NA	NA	300
Orange	17	76	35	0	6	3	0	0	257	0	59	0	1	9	0	0	0	0	18	150	295
Placentia	9	58	50	0	1	1	0	1	1	5	13	24	0	0	2	0	0	69	14	73	147
R S Margarita	0	4	11	0	1	18	0	5	4	7	3	12	3	0	1	0	0	0	10	13	46
San Clemente	NA	581	NA	NA	6	NA	NA	0	NA	NA	92	NA	NA	0	NA	NA	0	NA	NA	679	NA
S J Capistrano	12	7	8	1	2	1	4	9	10	17	13	26	0	1	1	0	0		34	32	46
Santa Ana	7	6	37	6	7	7	0	0		7	3	6	0	0	2	0	0		20	16	52
Seal Beach	NA	NA	17	NA	NA		NA	NA		NA	NA	14	NA	NA		NA	NA		NA	NA	31
Stanton	NA	0	0	NA	8	0	NA	0		NA	40		NA	2		NA	0		NA	50	0
Tustin	9	19	37	0	0	0	0	0	0	4	8	9	1	0	0	13	0	0	27	27	46
Villa Park	NA	4	5	NA	0	0	NA	0	0	NA	6	10	NA	0	0	NA	0	0	NA	10	15
Westminster	0	26	18	8	8	3	0	19	7	0	65	21	0	33	3	0	0	0	8	151	52
Yorba Linda	6	23	5	1	1	0	0	0	0	23	26	13	0	1	0	0	0	1	30	51	19
County of Orange	12	494	273	1	40	24	4	15	94	17	85	53	0	25	0	0	8	0	34	667	444
TOTALS	458	2,230	1,539	59	297	291	121	243	563	868	834	776	92	129	74	23	104	165	1,621	3,837	3,408

NA = Not Available

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Table C-10.2: Permittee Enforcement Actions, Comparison of 2002-03, 2003-04 and 2004-05

Permittee	EL	EL	EL	NON	NON	NON	ACO	ACO	ACO	CDO	CDO	CDO	Mis	Mis	Mis	Inf	Inf	Inf	IOC	IOC	IOC	Other	Other	Other	TOTAL	TOTAL	TOTAL
	02-03	03-04	04-05	02-03	03-04	04-05	02-03	03-04	04-05	02-03	03-04	04-05	02-03	03-04	04-05	02-03	03-04	04-05	02-03	03-04	04-05	02-03	03-04	04-05	02-03	03-04	04-05
Aliso Viejo	0	3	7	27	4	19	0	0	1	0	17	2	0	0	0	0	0	0	4	38	79	3	0	0	34	62	108
Anaheim	0	1	13	20	39	34	11	39	28	1	0	0	2	0	0	0	0	0	0	0	0	1	0	0	35	79	75
Brea	0	11	6	2	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	3	13	8
Buena Park	8	5	2	0	10	21	0	16	47	0	0	20	0	0	0	0	0	0	0	0	6	0	0	8	31	96	
Costa Mesa	22	9	7	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	2	14	2	0	0	0	24	26	9
Cypress	5	10	3	10	21	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	7	17	31	35	
Dana Point	NA	14	24	NA	19	12	NA	0	9	NA	0	1	NA	0	0	NA	0	0	NA	0	1	NA	0	18	NA	33	65
Fountain Valley	12	391	71	4	8	6	21	12	15	6	6	9	0	0	0	0	0	0	0	0	0	40	0	50	83	417	151
Fullerton	0	0	NA	23	59	NA	5	0	NA	0	0	NA	0	0	NA	0	14	NA	26	0	NA	0	0	NA	54	73	NA
Garden Grove	21	19	75	2	11	39	0	0	0	0	1	0	0	1	0	0	0	0	0	1	0	0	0	0	23	32	115
Huntington Beach	60	61	96	54	47	127	5	5	0	1	0	0	0	0	0	0	0	0	0	30	0	0	2	120	113	255	
Irvine	32	14	0	0	88	0	24	33	0	0	0	0	0	0	0	0	0	0	0	0	14	5	0	70	140	0	
La Habra	0	0	0	0	1	15	0	0	1	0	0	3	0	0	0	0	0	0	0	0	50	19	32	50	20	51	
La Palma	18	41	31	8	24	15	0	2	4	0	0	1	0	2	0	0	0	0	0	2	0	0	14	26	69	67	
Laguna Beach	0	5	2	71	62		52	83	0	0	0	0	1	0	0	0	57	0	0	37	0	114	60	184	244	116	
Laguna Hills	8	6	16	5	11	20	1	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	16	18	36	
Laguna Niguel	NA	8	10	NA	1	4	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	9	14
Laguna Woods	27	30	15	11	13	18	1	1	0	0	1	0	0	0	0	0	0	0	6	2	1	0	0	40	51	35	
Lake Forest	90	2	2	3	23	42	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	93	25	45	
Los Alamitos	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	0	
Mission Viejo	134	15	5	58	139	31	0	0	0	1	0	1	0	0	0	0	0	0	0	2	0	0	0	193	154	39	
Newport Beach	6	8	20	250	618	209	200	315	0	0	0	0	0	0	0	0	0	0	0	166	300	550	1100	756	1491	1495	
Orange	0	75	0	0	4	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	79	2
Placentia	8	20	7	0	11	19	3	3	0	3	1	0	0	0	1	0	0	0	0	0	0	31	41	14	66	68	
R S Margarita	10	7	48	0	0	13	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	5	10	8	66	
San Clemente	72	430	175	37	160	98	0	10	0	1	9	11	0	0	0	0	0	0	2	0	45	8	10	2	120	619	331
S J Capistrano	24	6	0	9	2	0	0	7	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	34	16	0	
Santa Ana	1	4	1	2	9	18	1	1	1	1	0	0	0	0	0	0	0	0	0	0	14	2	0	19	16	20	
Seal Beach	4	35	0	21	41	0	0	0	0	0	0	0	0	0	0	0	0	0	0	31	3	6	0	28	82	31	
Stanton	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Tustin	0	169	38	16	27	21	0	5	0	0	0	0	0	0	0	0	0	0	0	1	11	0	0	27	201	60	
Villa Park	15	0	3	0	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	0	15	10	15	
Westminster	13	55	35	1	0	4	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	52	15	55	92	
Yorba Linda	1	2	0	21	34	9	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	22	41	9	
County of Orange	5	4	3	20	12	12	2	9	4	0	0	0	0	0	0	0	0	0	0	0	3	2	0	30	27	19	
TOTALS	600	1,460	715	675	1,502	845	327	544	110	16	36	49	4	3	1	0	71	1	34	96	368	511	639	1,439	2,167	4,351	3,528

NA = Not Available EL = Educational Letter ACO = Administrative Compliance Order Mis = Misdemeanor IOC = Issuance of Citation
 NON = Notice of Non-Compliance CDO = Cease and Desist Order Inf = Infraction

SECTION C10, ILLEGAL DISCHARGES/ILLICIT CONNECTIONS

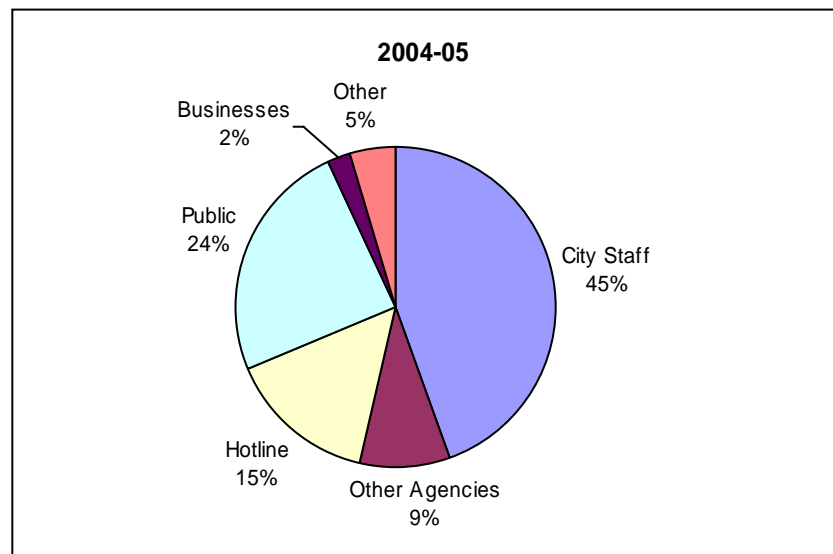
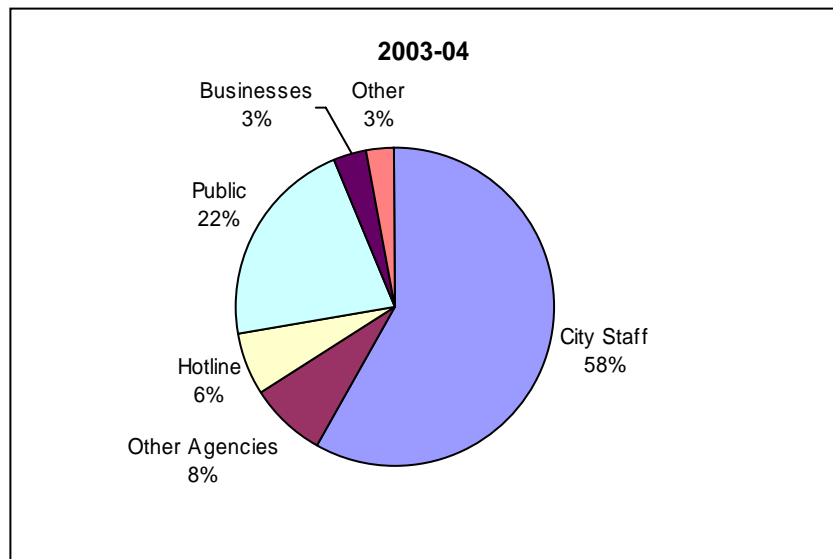
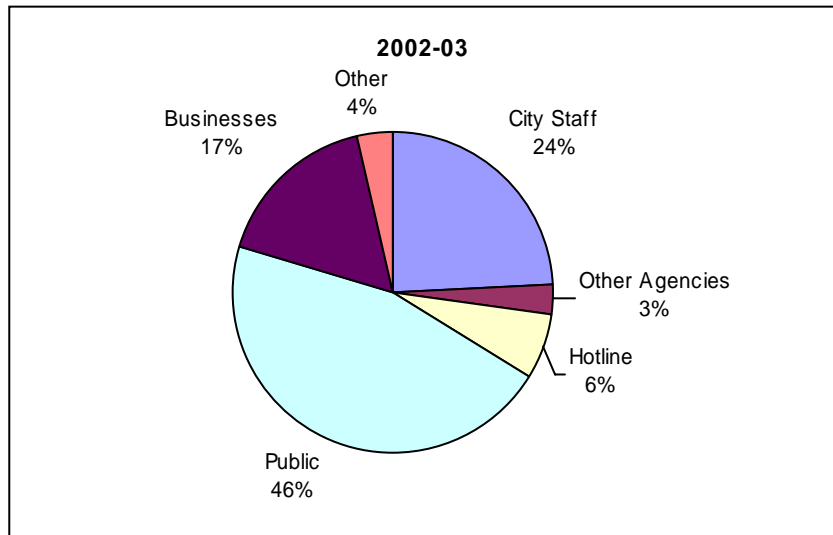
Table C-10.3: Types of Materials

Permittee	Hydrocarbon	Inorganic Compound	Metals	Nutrient	Organic Compound	Discharge Exceptions	Pathogens	Wastewater	Pesticides	Sediment	Trash and Debris	Misc	Totals
Aliso Viejo	8	3	0	2	0	3	0	1	0	11	6	3	37
Anaheim	19	1	0	0	0	1	0	34	0	0	0	172	227
Brea	11	2	0	0	0	0	1	4	0	0	4	8	30
Buena Park	13	4	1	0	0	0	3	23	0	4	5	10	63
Costa Mesa	3	1	0	0	14	0	1	2	0	5	3	3	32
Cypress	7	0	0	0	3	0	0	4	0	5	0	16	35
Dana Point	2	3	0	1	0	26	3	11	1	18	1	7	73
Fountain Valley	7	4	0	0	0	0	3	29	0	20	41	0	104
Fullerton	0	2	0	0	1	3	0	33	0	20	70	27	156
Garden Grove	43	18	0	0	3	3	25	147	0	13	63	16	331
Huntington Beach	6	14	1	0	3	7	10	42	0	98	19	10	210
Irvine	0	0	0	0	0	0	0	0	0	0	0	0	0
La Habra	3	1	0	0	0	0	0	2	0	6	2	22	36
La Palma	2	21	0	0	0	0	3	26	0	11	3	1	67
Laguna Beach	10	27	0	0	0	0	0	5	0	73	2	11	128
Laguna Hills	0	0	0	0	0	0	0	5	0	3	1	2	11
Laguna Niguel	1	0	0	0	1	3	0	0	0	2	1	6	14
Laguna Woods	27	4	0	1	4	5	10	5	0	20	43	1	120
Lake Forest	5	15	0	2	7	0	22	17	0	17	2	18	105
Los Alamitos	0	0	0	0	0	0	0	0	0	0	0	0	0
Mission Viejo	7	14	0	0	0	0	0	4	0	0	0	87	112
Newport Beach	8	51	0	26	31	15	8	30	0	84	11	36	300
Orange	22	7	1	0	1	36	34	76	0	49	31	42	299
Placentia	10	8	0	0	1	10	1	16	1	22	7	2	78
RS Margarita	10	2	2	1	0	2	0	3	0	8	19	1	48
San Clemente	22	30	0	9	0	7	14	42	0	143	19	92	378
SJ Capistrano	3	1	0	0	1	2	0	7	0	6	9	17	46
Santa Ana	13	12	1	0	0	0	0	14	0	0	0	13	53
Seal Beach	1	0	0	0	0	0	0	13	0	9	2	6	31
Stanton	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0
Tustin	5	5	0	0	1	1	0	4	0	11	0	19	46
Villa Park	0	0	0	0	0	0	0	5	0	7	3	0	15
Westminster	3	1	0	0	0	5	2	15	0	12	6	8	52
Yorba Linda	0	2	0	1	2	1	0	5	0	3	3	2	19
County of Orange	25	11	0	0	0	3	16	0	0	0	0	58	113
TOTAL	296	264	6	43	73	133	156	624	2	680	376	716	3,369

NA = Not Available

SECTION C10, ILLEGAL DISCHARGES/ILLICIT CONNECTIONS

Figure C-10.1: Source of Complaints



SECTION C10, ILLEGAL DISCHARGES/ILLICIT CONNECTIONS

Figure C-10.2 Permittee Enforcement Actions 2002-03, 2003-04 and 2004-05

