

## C-9.0 EXISTING DEVELOPMENT

### C-9.1 Introduction

Stormwater discharges from commercial and industrial facilities may become contaminated when material management practices allow exposure to stormwater. Stormwater and urban runoff can also be contaminated from illicit connections and non-stormwater discharges such as improperly disposed waste. Consequently, identifying and addressing these practices and activities has been a core element of the Permittees' efforts to abate stormwater pollution since the First Term Permit. With the adoption of the Third Term Permits, the Existing Development program has been significantly expanded and Model Programs have been developed to pro-actively address the quality of urban and stormwater runoff from industrial, commercial, and residential areas.

### C-9.2 Program Development

During the First Term Permit, the objective of the then named Industrial Discharger Identification element was to identify industrial stormwater dischargers in Orange County and to notify them of the requirements of the local NPDES and Statewide General Industrial (SWRCB Order No. 97-03 DWQ, NPDES General Permit No. CAS000001, subsequently referred to as the Industrial Permit) and General Construction Permits.

In 1992, a central database was developed which consolidated the 40 CFR 122.26 (a) (4) notifications, current NPDES permit holders and industries whose Standard Industrial Classification (SIC) codes were identified by the State Water Resources Control Board as requiring coverage under the Industrial Permit. The database provided the basis for a single notification to all the identified industrial facilities informing the facilities' staff of the existence of the Orange County Stormwater Program and possible industrial permit application requirements.

The Third Term Permits require the development and implementation of an Existing Development Program for inspecting and ensuring compliance of industrial and commercial facilities with the requirements of the Permittees' water quality ordinances. This Program was developed under the auspice of the Existing Development Task Force, comprised of County and city personnel. The objectives of this Model Existing Development Program are to provide Permittees with:

- A framework for establishing a program to reduce the effects commercial/industrial activities have on water quality in receiving waters;
- An iterative process to monitor and respond to problems as they are discovered; and
- Methodologies to meet Third Term Permit requirements.

The Existing Development Program must also include a food facility inspection program. This was submitted to the Santa Ana Regional Board on July 1, 2002.

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During the 2002-03 reporting period, the San Diego Region Permittees developed a model Residential Program to address runoff from residential areas that can be tailored to each Permittee's organization and needs. The Residential Program provides:

- A framework and a process for a municipality to follow in the development of the existing residential component;
- Development of a source identification procedure;
- Prioritization of threat to water quality from each residential area within the Permittee's jurisdiction;
- Identification of Best Management Practices (BMPs) most appropriate for each area, based on residential activities;
- Program implementation, focusing on public outreach and education;
- Reporting program for the assessment of program effectiveness; and
- Methodologies to meet NPDES Permit requirements.

During the 2002-03 reporting period, the San Diego Region Permittees also began developing a plan to manage runoff from common interest areas (CIAs) and homeowners associations (HOAs). As with the Residential element, the Runoff Plan for Common Interest Areas/HOAs can be tailored to each Permittee's organization and needs. The objective of the CIA/HOA Program is to provide the Permittees with:

- A program framework for reducing the potential impact of existing CIA/HOA activities upon the quality of receiving waters;
- An iterative process to monitor for and respond to problems as they are discovered; and
- Methodologies to meet NPDES permit requirements.

### **C-9.3 Program Implementation**

The Existing Development Program provides a framework and a process for each Permittee to develop its own commercial/industrial program consistent with Third Term Permit requirements and DAMP commitments. Key program components include:

- Pollution Prevention
- Source Identification and Facility Inventory
- Prioritization for Inspection
- Implementation of Best Management Practices
- Monitoring Program
- Inspections of Industries
- Enforcement
- Non-compliant Industrial Site Identification and Regional Board Notification Procedures
- Program Reporting

Individual Permittee industrial and commercial inventories are located in each Permittee's respective PEA which also includes a summary of BMP implementation

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and effectiveness. This year's BMP summary indicates progress regarding implementation of the Existing Development Program.

For this reporting period, the Permittees reported the following data:

### C-9.3.1 Industrial and Commercial Facility BMP Implementation

For the 2004-05 reporting period, the Permittees reported 1,831 industrial facilities with BMPs fully implemented (67%), 747 with BMPs partially implemented (28%), and 128 with no BMPs implemented (4.5%). In 2003-04, the Permittees reported 2,388 industrial facilities with BMPs fully implemented (59%), 1,166 with BMPs partially implemented (29%), and 475 with no BMPs implemented (12%). In 2002-03, the Permittees reported 544 industrial facilities with BMPs fully implemented (53%), 112 industrial facilities with BMPs partially implemented (11%), and 60 with no BMPs implemented (6%)(**Table C-9.1**).

For the 2004-05 reporting period, the Permittees reported 3,291 commercial facilities with BMPs fully implemented (63%), 1,609 with BMPs partially implemented (30%), and 666 with no BMPs implemented (7%). In 2003-04, the Permittees reported 6,524 commercial facilities with BMPs fully implemented (76%), 1,777 with BMPs partially implemented (21%), and 183 with no BMPs implemented (7%). In 2002-03, the Permittees reported 877 commercial facilities with BMPs fully implemented (63%), 418 with BMPs partially implemented (30%), 94 with no BMPs implemented (7%)(**Table C-9.2**).

***Headline Indicator - Number of BMPs Implemented:*** For 2004-05, 8,272 commercial and industrial facilities were reported to have BMP implementation, 62% of which have full BMP implementation. This figure appears to represent a 34% decrease from the total of industrial and commercial facilities with BMP implementation reported in 2003-04 (a decrease of 42% in facilities with full BMP implementation) and an increase of 244% from the total reported 2002-03 (an increase of 260% in facilities with full BMP implementation). The 2003-04 comparison suggests inconsistent reporting of this indicator. However, the decrease may reflect findings of no stormwater exposures.

### C-9.3.2 Industrial and Commercial Facility Prioritization

For the 2004-05 reporting period the Permittees designated 749 industrial facilities as high priority (26%), 1,235 were designated medium priority (44%), and 837 were designated low priority (29%) . In 2003-04, the Permittees designated 1,081 industrial facilities as high priority (12%), 2,915 were designated medium priority (34%), and 4,608 were designated low priority (53%). In 2002-03, 1,281 industrial facilities were designated high priority (15%), 3,349 were designated medium priority (39%), and 3,916 were designated low priority (46%) (**Table C-9.3**).

For the 2004-05 reporting period the Permittees designated 4,899 commercial facilities as high priority (21%), 3,264 were designated medium priority (14%), and 15,132 were designated low priority (65%). In 2003-04, the Permittees designed 5,733 commercial

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facilities as high priority (24%), 3,441 were designated medium priority (14%), and 14,604 were designated low priority (61%). In 2002-03, 4,949 commercial facilities were designated high priority (21%), 3,025 were designated medium priority (13%), and 14,815 were designated low priority (65%) (**Table C-9.4**).

***Headline Indicator - Prioritization of Facilities:*** In 2004-05, 26,116 commercial and industrial facilities were prioritized; 22% of which were designated as high priority. This represents a 19% decrease from the total of industrial and commercial facilities prioritized in 2003-04 (a 17% decrease in facilities designated as high priority); and a decrease of 17% from the total of industrial and commercial facilities prioritized in 2002-03 (a 9% decrease in facilities with designated as high priority). The level of prioritization, albeit proportional across the permit term, is showing an overall decrease in the number of facilities that are prioritized, which may point to this index being insufficiently sensitive. It is also likely that inspectors are refining the inventory and that a longer period of time is needed for meaningful comparison.

### C-9.3.3 Enforcement

Enforcement for the industrial and commercial component of the Existing Development Program is the responsibility of individual Permittees. Each Permittee has several different levels of enforcement to choose from for different types of situations. This includes – from least severe to most severe – issuance of an Educational Letter, a Notice of Non-Compliance, an Administrative Compliance Order, a Cease and Desist Order, or a Misdemeanor/Infraction.

For industrial facilities, the Permittees reported issuing 275 Educational Letters, 66 Notices of Non-Compliance, 22 Administrative Compliance orders, 6 Cease and Desist orders, and 2 Misdemeanors/Infractions in 2004-05. Therefore, 70% of the enforcement actions for industrial facilities were in the form of an Educational Letter, 18% in the form of a notice of Non-Compliance, 6% in the form of an Administrative Compliance Order, 1.6% in the form of a Cease and Desist Order, and 0.5% in the form of a Misdemeanor/Infraction. In 2003-04, 1,460 Educational Letters (46%), 779 Notices of Non-Compliance (25%), 350 Administrative Compliance Orders (11%), 7 Cease and Desist Orders (0.2%), and 550 Misdemeanors/Infractions (17%) were issued. In 2002-03, 76 Educational Letters (14%), 257 Notices of Non-Compliance (48%), 200 Administrative Compliance Orders (37%), zero (0) Cease and Desist Orders, and zero (0) Misdemeanors/Infractions were issued (**Table C-9.5**).

For commercial facilities, the Permittees reported issuing 730 Educational Letters, 327 Notices of Non-Compliance, 75 Administrative Compliance orders, 22 Cease and Desist orders, and 38 Misdemeanors/Infractions in 2004-05. Therefore, 61% of the enforcement actions for commercial facilities were in the form of an Educational Letter, 27% in the form of a notice of Non-Compliance, 6% in the form of an Administrative Compliance Order, 1.8% in the form of a Cease and Desist Order, and 3.2% in the form of a Misdemeanor/Infraction. In 2003-04, 999 Educational Letters (65%), 380 Notices of Non-Compliance (25%), 141 Administrative Compliance Orders (9%), 7 Cease and Desist Orders (0.5%) and 7 Misdemeanors/Infractions (0.5%) were issued. In 2002-03, 362 Educational Letters (63%), 92 Notices of Non-Compliance (16%), 26 Administrative

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Compliance Orders (4.5%), 9 Cease and Desist Orders (1.6%), and 1 Misdemeanor/Infraction (0.2%) were issued (**Table C-9.6**).

***Headline Indicator - Number and Level of Enforcement Actions:*** *The Permittees reported a total of 1,563 enforcement actions against industrial and commercial facilities during the 2004-05 reporting period. This represents a 67% decrease from the total reported in 2003-04. While the 2003-04 comparison suggests some inconsistent reporting (e.g. Newport Beach, which compiled enforcement activity data in Section C-10.0), it may also suggest an increased level of compliance.*

In addition to the compilation of industrial and commercial inventories, the Permittees addressed the needs concerned with runoff from residential areas. Each Permittee's residential program effective assessment details their respective efforts.

### C-9.3.4 Food Facility Inspection Program

The Orange County Permittees developed and submitted a food facility inspection program to the Santa Ana Regional Board on July 1, 2002. This program involves inspections and the distribution of educational materials at the approximately 10,000 existing restaurants (the inventory will be updated annually) countywide.

The implementation of the Program is in addition to the environmental health inspections conducted by the County of Orange Health Care Agency (HCA). The HCA inspectors identify NPDES issues during these inspections, and they are forwarded to the respective Permittees and addressed by Permittee staff.

The report categorizes food facilities by city and contains the following information for each entry: inspection date, facility name and address, program element (identifies facility size), facility owner, and NPDES observation code(s) showing water quality issues of concern. The five target NPDES observation codes are:

- AA60 - Improper Oil/Grease Disposal into Parking Lot/Street
- AA61 - Condition of Refuse Containers and Trash Bin Enclosures
- AA62 - Washing Mats, Grease Filters or Trash Bins into Parking or Street
- AA63 - Improper Methods of Spill Cleanup
- AA64 - Maintenance Records (lack of or not up to date)

For the 2004-05 reporting period, 25,078 food facility inspections were conducted and 1,416 were reported to have NPDES violations. For the 2003-04 reporting period, 12,635 food facility inspections were conducted and 1,298 were reported to have NPDES issues (**Table C-9.7**). The disparity in the total number of inspections may reflect the additional efforts of inspections above a baseline HCA commitment of one inspection for NPDES issues annually.

#### **C-9.4 Program Training and Outreach**

To assist municipal staff in understanding the Existing Development Program, six training modules were developed.

The six training modules are 1) *Existing Development Program Management Module*, 2) *Field Implementation of Existing Development Program Module*, 3) *Existing Development Program Training – Automobile Mechanical Repair, Maintenance, Fueling and Cleaning Businesses Module*, 4) *Existing Development Program Training – Landscape Maintenance Businesses Module*, 5) *Existing Development Program Training – Common Interest Areas/Homeowner Associations Module*, and 6) *Existing Development Program Training – Industrial Stormwater Monitoring Module*.

##### *Existing Development Program Management Module (DAMP Appendix B Exhibit B-9.I)*

This training module is generally targeted for stormwater program managers and addresses the overall program framework, objectives and approach so that they may gain a broad understanding of how the program is developed and implemented at the local level.

On August 26, 2004 Program Management training was conducted. Thirteen (13) staff members from ten (10) Permittees attended this training.

##### *Field Implementation of Existing Development Program Module (DAMP Appendix B Exhibit B-9.II)*

This training module is generally targeted for staff responsible for code enforcement and inspection of industrial facilities and addresses the basic field element program requirements and provides detailed instruction on conducting inspections.

On July 13, 2004, Field Implementation training was conducted. Thirty-eight (38) staff members from fourteen (14) Permittees attended the training.

##### *Existing Development Program Training – Automobile Mechanical Repair, Maintenance, Fueling and Cleaning Businesses Module (DAMP Appendix B Exhibit B-9.III)*

This training module is generally targeted for business owners and operators of automobile maintenance related businesses and explains the overall effort by Orange County to address stormwater and what the business can do to improve water quality.

On February 17, 2005, Automobile Mechanical Repair, Maintenance, Fueling and Cleaning Businesses training was conducted. Thirty-two (32) staff members from sixteen (16) Permittees attended the training.

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### *Existing Development Program Training – Landscape Maintenance Businesses Module (DAMP Appendix B Exhibit B-9.IV)*

This training module is generally targeted for business owners and operators of landscape maintenance related businesses and explains the overall effort by Orange County to address stormwater and what the business can do to improve water quality.

On February 17, 2005, Landscape Maintenance training was conducted. Thirty-two (32) staff members from sixteen (16) Permittees attended the training.

### *Existing Development Program Training – Common Interest Areas/Homeowner Associations Module (DAMP Appendix B Exhibit B-9.V)*

This training module generally targets Homeowner Associations and staff responsible for common interest areas and provides an overview of the County's stormwater program and what the HOA can do to improve water quality.

On February 17, 2005, Common Interest Area/Home Owners Association training was conducted. Thirty-two (32) staff members from sixteen (16) Permittees attended the training.

### *Existing Development Program Training – Industrial Stormwater Monitoring Module (DAMP Appendix B Exhibit B-9.VI)*

This training module is used in conjunction with the Field Implementation of Existing Development module (*DAMP Appendix B Exhibit B-9.II*); consequently, the audience is staff responsible for code enforcement and inspection of industries facilities, as well as the managers of industrial facilities subject to monitoring requirements. This training provides an overview of the regulatory requirements for industrial monitoring and then specifics on analytical monitoring.

No training for this module was conducted this reporting period.

### *Existing Development Program Training – Food Facility Inspection Training Module (DAMP Appendix B)*

The Food Facility Inspection Training Program was a “how-to” training session in which those in attendance were presented with the tools and skills to conduct a successful and accurate food facility inspection.

The Food Facility Inspection Training was conducted on March 3, 2005. Forty (40) staff members from twenty-three (23) Permittees attended the training.

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Table C-9.1: Industrial Inventory and BMP Implementation, Comparison of 2002-03, 2003-04 and 2004-05

PERMITTEE	NUMBER OF FACILITIES WITH BMPs:										TOTAL 2002-03	TOTAL 2003-04	TOTAL 2004-05
	FULLY Implemented 2002-03	FULLY Implemented 2003-04	FULLY Implemented 2004-05	PARTIALLY Implemented 2002-03	PARTIALLY Implemented 2003-04	PARTIALLY Implemented 2004-05	NO BMPs Implemented 2002-03	NO BMPs Implemented 2003-04	NO BMPs Implemented 2004-05				
	Aliso Viejo	2	49	31	1	15	11	0	0				
Anaheim	0	160	312	0	82	80	0	0		0	242	392	
Brea	NA	NA	15	NA	NA		NA	NA	10	NA	NA	25	
Buena Park	NA	188	151	NA	33	102	NA	0	29	NA	221	282	
Costa Mesa	142	530	115	0	168	28	0	0		335	698	143	
Cypress	NA	0	NA	NA	4	NA	NA	0	NA	0	4	NA	
Dana Point	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	
Fountain Valley	10	36	52	5	8		5	0		25	44	52	
Fullerton	36	38	34	NA	23	2	NA	344		36	405	36	
Garden Grove	NA	55	28	NA	43	38	NA	3	1	NA	101	67	
Huntington Bch	3	52	14	4	19	20	17	28	33	28	99	67	
Irvine	136	132	37	31	467	58	12	68		205	667	95	
La Habra	NA	8	49	NA	57	108	NA	28	15	NA	93	172	
La Palma	0	NA	1	0	NA	6	0	NA	1	0	NA	8	
Laguna Beach	NA	21		NA	16		NA	0		NA	37	0	
Laguna Hills	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	
Laguna Niguel	3	0		0	0		0	0		3	0	0	
Laguna Woods	NA	0	NA	NA	0	NA	NA	0	NA	0	0	NA	
Lake Forest	0	0	12	11	11		0	0		11	11	12	
Los Alamitos	NA	8		NA	0		NA	0		0	8	0	
Mission Viejo	24	0	2	43	4	2	13	0		136	4	4	
Newport Beach	4	1	1	0	1	2	0	0		4	2	3	
Orange	NA	64	142	NA	2	149	NA	0	9	NA	66	300	
Placentia	16	0	3	14	19	7	12	2	1	56	21	11	
R S Margarita	0	0	2	0	0	2	0	0	28	0	0	32	
San Clemente	NA	NA	2	NA	NA	0	NA	NA	0	NA	NA	2	
S J Capistrano	1	10	8	2	4	2	0	0	0	4	14	10	
Santa Ana	NA	818	639	NA	132	63	NA	0		NA	950	702	
Seal Beach	NA	0	1	NA	2	1	NA	0	0	NA	2	2	
Stanton	NA	28	28	NA	4	58	NA	1	1	NA	33	87	
Tustin	NA	17	17	NA	49		NA	0		NA	66	17	
Villa Park	0	0	0	1	0	0	0	0	0	1	0	0	
Westminster	1	24	25	0	3	3	0	1		1	28	28	
Yorba Linda	166	130	94	0	0	3	1	0		168	130	97	
County of Orange	NA	19	16	NA	0	2	NA	0	0	0	19	18	
<b>TOTALS</b>	<b>544</b>	<b>2,388</b>	<b>1,831</b>	<b>112</b>	<b>1,166</b>	<b>747</b>	<b>60</b>	<b>475</b>	<b>128</b>	<b>1,017</b>	<b>4,029</b>	<b>2,706</b>	

NA = Not Available



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Table C-9.2: Commercial Inventory and BMP Implementation, Comparison of 2002-03, 2003-04 and 2004-05

PERMITTEE	Number of Facilities with BMPs:										TOTAL 2002-03	TOTAL 2003-04	TOTAL 2004-05
	FULLY Implemented 2002-03	FULLY Implemented 2003-04	FULLY Implemented 2004-05	PARTIALLY Implemented 2002-03	PARTIALLY Implemented 2003-04	PARTIALLY Implemented 2004-05	NO BMPs Implemented 2002-03	NO BMPs Implemented 2003-04	NO BMPs Implemented 2004-05				
Aliso Viejo	69	35	35	4	64	75	8	4		81	103	110	
Anaheim	0	35	46	0	2	27	0	0		0	37	73	
Brea	NA	0	0	NA	0	0	NA	0	0	NA	0	0	
Buena Park	0	183	98	5	29	60	0	0	43	5	212	201	
Costa Mesa	623	3,298	64	0	665	2	0	0		623	3,963	66	
Cypress	NA	0		NA	2	2	NA	0		0	2	2	
Dana Point	NA	NA	25	NA	NA	145	NA	NA	11	NA	NA	181	
Fountain Valley	0	251	225	0	0		0	0		0	251	225	
Fullerton	NA	0		NA	0		NA	0		NA	0	0	
Garden Grove	NA	66	824	NA	29	455	NA	3	4	NA	98	1,283	
Huntington Bch	9	59	26	2	108	21	11	120	34	22	287	81	
Irvine	NA	DNR		NA	DNR		NA	DNR		NA	DNR	0	
La Habra	NA	28	85	NA	107	111	NA	36	77	NA	171	273	
La Palma	0	24	22	0	18	13	0	0		0	42	35	
Laguna Beach	NA	NA		NA	NA		NA	NA		NA	NA	0	
Laguna Hills	31	150	222	0	0		3	10	5	34	160	227	
Laguna Niguel	0	123	27	0	15	18	0	0		0	138	45	
Laguna Woods	NA	0		NA	27	28	NA	0		0	27	28	
Lake Forest	0	0		77	48	19	0	0		77	48	19	
Los Alamitos	NA	86		NA	12		NA	0		0	98	0	
Mission Viejo	68	164	268	314	51	29	57	0		439	215	297	
Newport Beach	NA	NA	6	NA	NA	6	NA	NA		NA	NA	12	
Orange	NA	207	0	NA	0	0	NA	0	0	NA	207	0	
Placentia	NA	0	32	9	63	32	NA	0		9	63	64	
R S Margarita	0	0	64	0	0	21	0	0	482	0	0	567	
San Clemente	NA	139	NA	NA	12	NA	NA	0	NA	NA	151	NA	
Santa Ana	NA	818	304	NA	132	109	NA	0		NA	950	413	
S J Capistrano	75	139	132	7	12	0	15	0	0	97	151	132	
Seal Beach	NA	0	0	NA	122	0	NA	0	0	NA	122	0	
Stanton	NA	35	35	NA	10	10	NA	3	10	NA	48	55	
Tustin	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	
Villa Park	0	0	0	0	0	0	0	0	0	0	0	0	
Westminster	0	633	675	0	219	409	0	7		0	859	1,084	
Yorba Linda	NA	10	27	NA	27	7	NA	0		NA	37	34	
County of Orange	2	41	49	NA	3	10	NA	NA	0	2	44	59	
<b>TOTALS</b>	<b>877</b>	<b>6,524</b>	<b>3,291</b>	<b>418</b>	<b>1,777</b>	<b>1,609</b>	<b>94</b>	<b>183</b>	<b>666</b>	<b>1,389</b>	<b>8,484</b>	<b>5,566</b>	

NA = Not Available

DNR = Did Not Report

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Table C-9.3: Countywide Permittee's Industrial Inventory and Prioritization, Comparison of 2002-03, 2003-04 and 2004-05

PERMITTEE	HIGH 2002-03	HIGH 2003-04	HIGH 2004-05	MEDIUM 2002-03	MEDIUM 2003-04	MEDIUM 2004-05	LOW 2002-03	LOW 2003-04	LOW 2004-05	TOTAL 2002-03	TOTAL 2003-04	TOTAL 2004-05
Aliso Viejo	2	2	2	65	65	42	0	0	0	67	67	44
Anaheim	129	115	93	419	45	0	868	1,126	299	1,416	1,286	392
Brea	11	14	13	32	28	27	167	137	111	210	179	151
Buena Park	24	184	115	52	18	17	0	17	27	76	219	159
Costa Mesa	489	287	13	329	475	2	0	40	128	818	802	143
Cypress	2	4	0	5	2	0	34	38	0	41	44	0
Dana Point	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Fountain Valley	4	44	4	0	0	48	32	0	0	36	44	52
Fullerton	36	38	37	23	23	0	554	344	0	613	405	37
Garden Grove	25	41	30	35	51	11	310	296	25	370	388	66
Huntington Beach	30	25	30	38	69	13	645	529	23	713	623	66
Irvine	236	3	95	98	21	0	841	520	0	1,175	599	95
La Habra	NA	65	65	NA	249	48	NA	228	59	NA	542	172
La Palma	8	5	5	2	3	5	9	11	0	19	19	10
Laguna Beach	0	0	0	28	23		35	14		63	37	0
Laguna Hills	NA	1	0	NA	0	0	NA	0	0	0	1	0
Laguna Niguel	2	1	0	0	0	0	0	0	0	2	1	0
Laguna Woods	0	0	0	0	0	0	0	0	0	0	0	0
Lake Forest	11	11	12	0	0		0	0		11	11	12
Los Alamitos	6	7	1	71	19	27	24	96	23	101	122	51
Mission Viejo	5	4	4	30	31		56	56		91	91	4
Newport Beach	2	2	2	0	0	0	11	11	11	13	13	13
Orange	69	52	72	422	416	228	256	249	0	747	717	300
Placentia	21	16	12	18	0		6	109	40	45	125	52
R S Margarita	1	1	3	10	10	10	19	19	19	30	30	32
San Clemente	2	3	2	72	72		0	0		74	75	2
S J Capistrano	1	1	1	11	5	5	15	8	4	27	14	10
Santa Ana	102	100	82	1,266	1,031	615	0	574	5	1,368	1,705	702
Seal Beach	2	2	2	0	0	0	0	0	0	2	2	2
Stanton	NA	18	18	NA	17	15	NA	118	0	NA	153	33
Tustin	9	11	13	59	6	7	0	49	55	68	66	75
Villa Park	NA	0	0	NA	0	0	NA	0	0	7	0	0
Westminster	10	4	4	37	18	18	34	6	6	81	28	28
Yorba Linda	29	4	7	214	206	88	0	13	2	243	223	97
County of Orange	13	16	12	13	12	9	0	0	0	26	28	21
<b>TOTALS</b>	<b>1,281</b>	<b>1,081</b>	<b>749</b>	<b>3,349</b>	<b>2,915</b>	<b>1,235</b>	<b>3,916</b>	<b>4,608</b>	<b>837</b>	<b>8,552</b>	<b>8,659</b>	<b>2,821</b>

NA = Not Available

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Table C-9.4: Countywide Permittee's Commercial Inventory and Prioritization, Comparison of 2002-03, 2003-04 and 2004-05

PERMITTEE	HIGH 2002-03	HIGH 2003-04	HIGH 2004-05	MEDIUM 2002-03	MEDIUM 2003-04	MEDIUM 2004-05	LOW 2002-03	LOW 2003-04	LOW 2004-05	TOTAL 2002-03	TOTAL 2003-04	TOTAL 2004-05
Aliso Viejo	153	153	110	0	0		0	0		153	153	110
Anaheim	114	14	13	278	310	310	194	307	307	586	631	630
Brea	0	0	0	138	117	129	0	180	228	138	297	357
Buena Park	0	119	283	5	40	20	0	50	26	0	219	329
Costa Mesa	1306	1107	969	587	555	483	4,559	2,548	2,083	6,542	4,210	3,535
Cypress	0	56		38	162		39	6		77	224	0
Dana Point	238	205	228	0	0		0	0		238	205	228
Fountain Valley	0	112	40	0	0	77	314	139	139	314	251	256
Fullerton	7	7	126	23	23	164	639	631	116	669	661	406
Garden Grove	0	7	47	102	90	204	5,797	5,807	5,587	5,899	5,904	5,838
Huntington Beach	403	261	276	7	170	206	233	920	831	643	1,351	1,313
Irvine	0	0		105	103	148	1,040	1,038	1,132	1,145	1,141	1,280
La Habra	NA	378	414	NA	340	306	NA	177	254	NA	895	974
La Palma	0	0		17	18	12	25	30	31	42	48	43
Laguna Beach	336	356		0	2		0	7		336	365	0
Laguna Hills	NA	237	325	NA	0		NA	0		NA	237	325
Laguna Niguel	182	183	177	0	0		0	0		182	183	177
Laguna Woods	28	24	24	3	3	3	65	83	89	96	110	116
Lake Forest	10	124	150	17	68		50	182		77	374	150
Los Alamitos	NA	98		173	32		800	0		973	132	0
Mission Viejo	426	423	484	0	0		0	0		426	423	484
Newport Beach	41	41	41	40	40	40	40	40	42	121	121	123
Orange	269	0		241	311	311	54	700	725	564	1,011	1,036
Placentia	127	375		44	0		310	0	373	481	375	373
R S Margarita	126	146	150	13	0		377	0	438	516	146	588
San Clemente	463	688	626	0	0		0	0		463	688	626
S J Capistrano	248	316		0	0		0	0		248	316	0
Santa Ana	0	0		779	26	26	1	917	923	780	943	949
Seal Beach	NA	0	23	NA	183	2	NA	0	859	NA	183	884
Stanton	NA	31	31	NA	168	168	NA	476	476	NA	675	675
Tustin	1	0	1	103	104	39	0	0	40	104	104	80
Villa Park	0	0		0	1		0	6		0	7	0
Westminster	354	140	213	95	365	443	278	354	428	727	859	1,084
Yorba Linda	20	25	42	171	162	126	0	6	5	191	193	173
County of Orange	97	107	106	46	48	47	0	0	0	143	155	153
<b>TOTALS</b>	<b>4949</b>	<b>5733</b>	<b>4899</b>	<b>3025</b>	<b>3441</b>	<b>3264</b>	<b>14,815</b>	<b>14,604</b>	<b>15,132</b>	<b>22,874</b>	<b>23,790</b>	<b>23,295</b>

NA = Not Available

SECTION C9, EXISTING DEVELOPMENT

Table C-9.5: Permittee Enforcement Actions for Industrial Facilities, Comparison of 2002-03, 2003-04 and 2004-05

PERMITTEE	EL	EL	EL	NON	NON	NON	ACO	ACO	ACO	CDO	CDO	CDO	M/I	M/I	M/I	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
Aliso Viejo	0	2	3	0	1	17	0	0	8	0	0		0	0		0	3	28
Anaheim	NA	0	0	NA	2	0	NA	1	0	NA	0	0	NA	0	0	NA	3	0
Brea	2	0	13	0	0	1	0	0		0	0		0	0		2	0	14
Buena Park	NA	0	2	NA	39	6	NA	5	13	NA	1	4	NA	0	1	NA	45	26
Costa Mesa	NA	0		NA	0		NA	0		NA	0		NA	0		NA	0	0
Cypress	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2	0
Dana Point	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Fountain Valley	5	393	52	0	8		0	12	1	0	6	1	0	0		5	419	54
Fullerton	36	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	36	0	NA
Garden Grove	2	5	2	0	0		0	0		0	0		0	0		2	5	2
Huntington Beach	6	0		0	0	5	0	15		0	0		0	0	1	6	15	6
Irvine	NA	939	95	NA	0		NA	0		NA	0		NA	0		NA	939	95
La Habra	NA	0		NA	0	28	NA	0		NA	0		NA	0		NA	0	28
La Palma	0	19	10	0	0		0	0		0	0	1	0	0		0	19	11
Laguna Beach	NA	0		NA	0		NA	0		NA	0		NA	0		NA	0	0
Laguna Hills	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0
Laguna Niguel	0	0		0	0		0	0	0	0	0		0	0		0	0	0
Laguna Woods	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA
Lake Forest	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0
Los Alamitos	NA	0		NA	0		NA	0		NA	0		NA	0		NA	0	0
Mission Viejo^	NA	0		NA	103		NA	0		NA	0		NA	0		NA	103	0
Newport Beach	6	8	2	250	618	0	200	315	0	0	0	0	0	550	0	456	1491	2
Orange	NA	66	0	NA	4	1	NA	0	0	NA	0	0	NA	0	0	NA	70	1
Placentia	7	7	10	0	0		0	0		0	0		0	0		7	7	10
R S Margarita	0	0	2	0	0		0	0		0	0		0	0		0	0	2
San Clemente	NA	7	0	NA	2	0	NA	2	0	NA	0	0	NA	0	0	NA	11	0
S J Capistrano	1	14	10	1	0	2	0	0	0	0	0	0	0	0	0	2	14	12
Santa Ana	NA	0	1	NA	0	2	NA	0		NA	0		NA	0		NA	0	3
Seal Beach	NA	NA	5	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	5
Stanton	DNR	NA		NA	NA		NA	NA		NA	NA		NA	NA		NA	NA	0
Tustin	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Villa Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Westminster	0	0	9	5	0	4	0	0		0	0		0	0		5	5	13
Yorba Linda	0	0	59	1	0	0	0	0	0	0	0	0	0	0	0	1	0	59
County of Orange	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
<b>TOTALS</b>	<b>76</b>	<b>1,460</b>	<b>275</b>	<b>257</b>	<b>779</b>	<b>66</b>	<b>200</b>	<b>350</b>	<b>22</b>	<b>0</b>	<b>7</b>	<b>6</b>	<b>0</b>	<b>550</b>	<b>2</b>	<b>533</b>	<b>3,151</b>	<b>371</b>

NA = Not Available      EL = Educational Letter      ACO = Administrative Compliance Order      M/I = Misdemeanor/Infraction  
DNR = Did Not Report      NON = Notice of Non-Compliance      CDO = Cease and Desist Order

SECTION C9, EXISTING DEVELOPMENT

Table C-9.6: Permittee Enforcement Actions for Commercial Facilities, Comparison of 2002-03, 2003-04, and 2004-05

PERMITTEE	EL 2002-03	EL 2003-04	EL 2004-05	NON 2002-03	NON 2003-04	NON 2004-05	ACO 2002-03	ACO 2003-04	ACO 2004-05	CDO 2002-03	CDO 2003-04	CDO 2004-05	M/I 2002-03	M/I 2003-04	M/I 2004-05	TOTAL 2002-03	TOTAL 2003-04	TOTAL 2004-05
Aliso Viejo	70	3	4	0	0	4	2	13	2	0	0	2	0	0	1	72	16	13
Anaheim	NA	0		NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Brea	NA	4	3	NA	1		NA	0		NA	0		NA	0		NA	5	3
Buena Park	5	0		0	87	16	0	19	33	0	4	16	0	0	4	5	110	69
Costa Mesa	2	10	6	3	3	67	0	10		0	0		0	0		2	23	73
Cypress	2	0		4	2		0	0		0	0		0	0		6	2	0
Dana Point	13	14	57	41	19	3	1	0	1	0	0		1	0	1	151	33	62
Fountain Valley	6	251	256	6	2	4	21	3	7	5	1	2	0	0		38	257	269
Fullerton	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA	NA	0	NA
Garden Grove	5	37	5	2	8	1	0	0		0	0		0	0		7	45	6
Huntington Beach	16	0		3	10	13	0	80		1	0		0	0	5	20	90	18
Irvine	NA	NA		NA	NA		NA	NA		NA	NA		NA	NA		NA	NA	0
La Habra	NA	0		NA	0	25	NA	0	1	NA	0		NA	0		NA	0	26
La Palma	0	0	15	0	0		0	0		0	0		0	0		0	0	15
Laguna Beach	NA	0		NA	0		NA	0	2	NA	0		NA	0		NA	0	2
Laguna Hills	NA	11	6	NA	9	4	NA	1		NA	0		NA	0		NA	20	10
Laguna Niguel	0	127		1	15	32	0	0		0	0		0	0		1	142	32
Laguna Woods	3	0	15	4	0	18	1	0	10	0	0		0	0		8	0	43
Lake Forest	77	1		1	14	12	0	0		0	0	1	0	0		78	15	13
Los Alamitos	NA	0		NA	0		NA	0		NA	0		NA	0		NA	0	0
Mission Viejo	118	0	2	20	103	16	0	0	17	1	0	0	0	0	2	139	103	37
Newport Beach	NA	NA	2	NA	NA		NA	NA		NA	NA		NA	NA		NA	NA	2
Orange	NA	269	0	NA	13	0	NA	0	0	NA	0	0	NA	0	0	NA	283	0
Placentia	10	30	64	0	0	13	1	0	1	2	0	1	0	0	1	13	30	80
R S Margarita	10	0	32	0	0	7	0	0		0	0		0	0		0	0	39
San Clemente	NA	187	91	NA	82	63	NA	15		NA	2		NA	7	24	NA	293	178
S J Capistrano	25	10	150	7	2	5	0	0	0	0	0	0	0	0	0	33	12	155
Santa Ana	NA	0	1	NA	3	18	NA	0	1	NA	0		NA	0		NA	3	20
Seal Beach	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Stanton	DNR	DNR		DNR	DNR		DNR	DNR		DNR	DNR		DNR	DNR		DNR	DNR	0
Tustin	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0	NA	0	0
Villa Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Westminster	0	0	2	0	2	3	0	0		0	0		0	0		0	2	5
Yorba Linda	0	45	19	0	1	0	0	0	0	0	0	0	0	0	0	0	46	19
County of Orange	NA	0	0	NA	4	3	NA	0	0	NA	0	0	NA	0	0	NA	4	3
<b>TOTALS</b>	<b>362</b>	<b>999</b>	<b>730</b>	<b>92</b>	<b>380</b>	<b>327</b>	<b>26</b>	<b>141</b>	<b>75</b>	<b>9</b>	<b>7</b>	<b>22</b>	<b>1</b>	<b>7</b>	<b>38</b>	<b>573</b>	<b>1,534</b>	<b>1,192</b>

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SECTION C9, EXISTING DEVELOPMENT

Table C-9.7: Food Facility Inspections 2004-05

PERMITTEE	No. of Routine Inspections	No. of NPDES Issues
Aliso Viejo	218	37
Anaheim	3,285	22
Brea	506	23
Buena Park	686	12
Costa Mesa	1,412	74
Cypress	421	0
Dana Point	374	12
Fountain Valley	545	22
Fullerton	1,054	123
Garden Grove	1,412	280
Huntington Beach	1,420	17
Irvine	1,388	52
La Habra	548	40
La Palma	118	1
Laguna Beach	382	31
Laguna Hills	332	72
Laguna Niguel	406	16
Laguna Woods	59	13
Lake Forest	547	27
Los Alamitos	193	8
Mission Viejo	591	40
Newport Beach	1,037	20
Orange	1,451	61
Placentia	386	18
Rancho Santa Margarita	179	23
San Clemente	529	7
San Juan Capistrano	302	17
Santa Ana	2,436	145
Seal Beach	217	3
Stanton	504	1
Tustin	648	60
Villa Park	26	1
Westminster	931	96
Yorba Linda	328	23
County of Orange	207	19
<b>Totals</b>	<b>25,078</b>	<b>1,416</b>

NA = Not Available