



SECTION 9

CO-PERMITTEE IND AND IC/ID SUMMARY TABLES

9. CO-PERMITTEE IND AND IC/ID SUMMARY TABLES

INTRODUCTION

On September 7, 2001, the IND and IC/ID Reporting Ad Hoc Task Group recommended the adoption of Program-wide categories and enforcement actions developed by the AHTG. These categories and procedures are described in the *Continuous Improvement of Industrial Reporting Technical Memorandum* and *Continuous Improvement of Illicit Connection/Illegal Dumping Reporting Technical Memorandum*. The Management Committee approved both memoranda as the Program's strategy to implement IND and IC/ID reporting requirements (as required in Permit Provisions C.6.a.i. and ii). The memoranda were included as attachments within the Program's *FY 00-01 Annual Report* and submitted to the Regional Board on September 17, 2001. Each Co-permittee began implementing these procedures immediately thereafter.

Since October 2001, Program staff has been assisting each Co-permittee (on an individual basis) with the implementation of enhanced reporting requirements for IND and IC/ID. To assist in this endeavor, Program staff created new IND and IC/ID inspection forms and a Microsoft Access® database for optional use. Each inspection form and database includes all of the IND and IC/ID categories described in the September 7, 2001 technical memoranda. (It should be noted that all of the Co-permittees may not necessarily have facilities in each of the categories).

IND and IC/ID summary tables, provided as Appendix H-1 of this section, were constructed by Program staff using data submitted from individual Co-permittees. The categories presented within the summary tables are consistent with the strategy provided in both technical memoranda dated September 7, 2001. In addition, summary tables represent incidents and/or inspections which occurred between July 1, 2003 and June 30, 2004. Pie charts and a bar graph showing pertinent information found within the IND and IC/ID summary tables are also included within this section. During FY 03-04, the Co-permittees conducted and/or responded to 7102 IND inspections and IC/ID incidents. A summary of IND inspections and IC/ID incidents reported for individual Co-permittees is provided as Appendix H-2. The vast majority (97 percent) of IND inspections conducted during FY 03-04 resulted in no action or level 1 enforcement (verbal or written warnings). Appendix H-1 provides detailed inspection data relating to facility categories and enforcement actions. In addition, the two most common IC/ID incidents during FY 03-04 were vehicle & equipment leaking and miscellaneous incidents. Approximately 52 percent of the IC/ID incidents received verbal or written warnings. Other relevant IC/ID information relating to incident type, incident report source, incident source and enforcement action is also provided within Appendix H-1.

In accordance with the Regional Board's letter, *Review of Program's Draft FY 2003-04 Work Plan* dated June 24, 2003, the Program has informed the Co-permittees (see FY 02-03 Annual Report Preparation Guidance dated June 18, 2003) that each Co-permittee should independently evaluate their individual IND and IC/ID inspection data for compliance evaluation and improvement and utilize the results of the analysis to set inspection priorities and gauge program effectiveness.