



CITY OF ORANGE

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July 11, 2014

Ms. Kathleen H. Johnson, Director
Enforcement Division
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Re: City of Orange Municipal Separate Storm Sewer System (MS4) Compliance
Audit Report

Dear Ms. Johnson:

We have reviewed your July 1, 2014 letter summarizing EPA's Audit Report findings of the City's Illicit Discharges/Illicit Connections (ID/IC); Litter, Debris and Trash Control and New Development/Significant Redevelopment MS4 programs.

The Audit Report makes two recommendations:

- 1) The City's ID/IC database should be expanded to include information on the corrective actions taken by the responsible party and the enforcement response taken by the City to eliminate the illegal discharge or connection;
- 2) The City should consider applying to the Orange County Transportation Authority (OCTA) for grant funds for trash reduction related projects.

Our response to these two items is as follows:

- 1) The City's ID/IC database contains a Comments column that identifies the type of discharge observed at the site and the actions taken by the responsible party or the City to eliminate the illegal discharge or connection. Care will be taken to ensure this information is provided on all calls the City receives and provides a response. We will however, expand the database to include additional columns that identify the party providing the corrective action along with the time and date the cleanup is completed. A column already exists on any enforcement action taken by the City and no additional database information is required.



- 2) The City also concurs with this recommendation. We recognize the Orange County Transportation Authority (OCTA) grants are a valuable source of funding for trash reduction projects. For this reason, the City submitted a grant application for OCTA Measure M2 funds starting in May 2011 and each subsequent year has continued to pursue these grants to implement projects in the City that will minimize the amount of trash entering water bodies.

We hope the above information and proposed City actions provide an adequate response to the Audit Report's findings and recommendations. If you have any questions or require further clarification, please call me at 714-744-5545 or Gene Estrada at 714-744-5547.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe DeFrancesco". The signature is stylized with a large initial "J" and a long horizontal stroke extending to the right.

Joe DeFrancesco
Public Works Director