



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

May 24, 2011

Subject: Palm Beach County Municipal Separate Storm Sewer System (MS4)
NPDES Permit No. FLS000018 (Cycle 2)
Year 8 Annual Report Comments

Dear Permittee:

Science Applications International Corporation (SAIC), contractor to the Florida Department of Environmental Protection (Department), has reviewed the Palm Beach County MS4 NPDES Permit Year 8 Annual Reports. The Department has determined that not all of the reports are complete. The reports will be considered complete when the permittees provide satisfactory responses to the Department's Year 8 Annual Report Comments, as applicable (see Appendix A).

An audit will not be conducted for the Year 8 reporting period since past audits of the permittees have not indicated significant implementation issues and because of the recently issued revised permit.

Please provide your written response within 35 days of the date of this letter to:

NPDES Stormwater Section
Florida Department of Environmental Protection
Mail Station 2500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

If you have any questions, please contact Robert van den Akker, with SAIC, by phone at (407) 243-3978 or by email at vandenakkerr@saic.com.

Sincerely,

A handwritten signature in black ink that reads 'Eric H. Livingston'.

Eric H. Livingston
Program Administrator
NPDES Stormwater Section

EHL/mvw

Enc: Appendix A – Palm Beach County MS4 NPDES Permit Year 8 Annual Report Comments

Addressees: Mo Thornton, City of Atlantis
Lomax Harrelle, City of Belle Glade
Tony Puerta, City of Boca Raton
Kafi Boateng, P.E., City of Boynton Beach
Betty James, Town of Cloud Lake
David Harden, City of Delray Beach
Cleo Marsh, P.E., Florida Department of Transportation (FDOT) District Four
Jose Quintana, P.E., FDOT Florida's Turnpike Enterprise
Carlos Cedeño, City of Greenacres
William Thrasher, Town of Gulf Stream
James Woods, Town of Haverhill
Dale Sugerman, Town of Highland Beach
Tanya Quickel, Indian Trail Improvement District
Joseph Lo Bello, Town of Juno Beach
David Rotar, Town of Jupiter
John Zuccarelli, Town of Jupiter Inlet Colony
Joann Hatton, Town of Lake Clarke Shores
Maria Davis, Town of Lake Park
Joseph Kroll, City of Lake Worth
Michael Bornstein, Town of Lantana
Linda Stumpf, Town of Manalapan
William Albury III, Town of Mangonia Park
Jorge Santos, Village of North Palm Beach
O'Neal Bardin, Northern Palm Beach County Improvement District
Kenneth Schenck, Town of Ocean Ridge
Alvin Johnson, City of Pahokee
Peter Elwell, Town of Palm Beach
Robert Weisman, Palm Beach County
Todd Engle, P.E., City of Palm Beach Gardens
John Workman, Town of Palm Beach Shores
Bob Hennes, Village of Palm Springs
Brynt Johnson, City of Riviera Beach
Paul Webster, P.E., Village of Royal Palm Beach
Shirley Walker-Turner, City of South Bay
Gale English, South Indian River Water Control District
Rex Taylor, Town of South Palm Beach
Russell White, Village of Tequesta
Mitchell Fleury, Village of Wellington
John Alford, City of West Palm Beach

Cc: Steven Mazuk, City of Atlantis
Mickey McGahee, City of Belle Glade
Christopher Roschek, P.E., City of Boynton Beach
Dorothy Gravelin, Town of Cloud Lake
Randal Krejcarek, P.E., City of Delray Beach
Ivette Leiva, FDOT District Four
Jeremiah Marek, FDOT Florida's Turnpike Enterprise
Wade Neilson, City of Greenacres
Joseph Roche, Town of Haverhill

Jack Lee, Town of Highland Beach
Anthony Meriano, Town of Juno Beach
Kevin Varney, Town of Lake Clarke Shores
David Hunt, Town of Lake Park
Jerry Darr, Town of Lantana
Lisa Peterson, Town of Manalapan
Lee Leffingwell, Town of Mangonia Park
Tara Ramsaroop, Village of North Palm Beach
Kenneth Roundtree, Northern Palm Beach County Improvement District
Martin Gauthier, Town of Palm Beach
Bonnie Finneran, Palm Beach County
Michael Morrow, City of Palm Beach Gardens
Walter Fleming, Town of Palm Beach Shores
Jevon White, City of Riviera Beach
Edgar Kerr, City of South Bay
Benny Rodgers, City of West Palm Beach
Jack Horniman, JLH Associates
Kyle Grandusky, Engenuity Group, Inc.
Alan D. Wertepny, P.E., Mock, Roos & Associates, Inc.
Robert van den Akker, SAIC (via email)
SAIC Contract File

APPENDIX A

Palm Beach County MS4 NPDES Year 8 Annual Report Comments

The Department has determined that additional information is needed to properly assess the Palm Beach County MS4 NPDES Permit Year 8 Annual Reports and deem them complete. The annual reports will be considered complete when the permittees provide satisfactory written responses to the comments detailed below. Please provide your response in writing to the Department **within 35 days** of the date of this letter. **The Department will provide an overall assessment of your compliance with the annual reporting requirements based on the information you provided in your annual report and your response to the comments below.**

City of Atlantis

- 1) Section VII, Part III.A.9.b "Construction Site Runoff – Inspection and Enforcement": The permittee reported "443" construction site plan / permit application reviews (private sites) and "443+" construction site inspections (private sites). Please confirm that all of these inspections were for stormwater, erosion and sedimentation control BMPs at the construction sites. In addition, please explain that if "443+" is an estimate, how this estimate was derived and why you are unable to provide the actual number of construction site inspections performed.

City of Belle Glade

- 1) Section VII, Part III.A.5 "Municipal Waste Treatment, Storage, and Disposal Facilities Not Covered by an NPDES Stormwater Permit": The permittee reported "0" facilities and activities. However, in the Year 6 and Year 7 Permit Assessment letters the permittee was informed that the Fleet Maintenance Shop located at 2050 South Canal Street should be reported under Part III.A.5 as well as Part III.A.3. Please confirm whether the stormwater inspections of this facility reported in Part III.A.3 "Roadways" included the waste-related areas.
- 2) Section VII, Part III.A.7.a "Illicit Discharges and Improper Disposal – Inspections, Ordinances, and Enforcement Measures": The permittee reported "0" proactive inspections. Both the Year 6 and Year 7 Permit Assessment letters contained a "Required Improvement" to begin to conduct proactive inspections. Please provide an explanation of why this required improvement was not implemented during the reporting period.

**Note: Given that this is the third consecutive year with a required improvement for this element, please note that this will be an area the Department will focus on as you develop and implement the requirements in your new permit for proactive inspections.*

City of Boca Raton

- 1) Section VII, Part III.A.3 "Roadways": The permittee reported "0" trash pick-up events and commented "None tracked this year," which was the same as reported in the Year 7 Annual Report. Please provide an explanation of why no events occurred or why none were tracked.

**Note: Given that this is the second consecutive year with a required improvement for this element, please note that this will be an area the Department will focus on as you develop and implement the requirements in your new permit for litter removal.*

- 2) Section VII, Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal": The permittee reported "0" investigations of suspected illicit connection / discharge / dumping reports but "3" illicit connections / discharges / dumping

found. The permittee also reported in Section VII, Part III.A.7.a "Illicit Discharges and Improper Disposal – Inspections, Ordinances, and Enforcement Measures" that "3" illicit connections / discharges / dumping were found out of "472" proactive inspections performed. Please confirm whether the "3" reported under proactive inspections (Part III.A.7.a) were the same "3" reported as the illicit connections / discharges / dumping found after investigations (Part III.A.7.c).

- 3) Section VII, Part III.A.9.b "Construction Site Runoff – Inspection and Enforcement": The permittee reported "4" construction site plan reviews (municipal sites) and "0" construction site inspections (municipal sites). Please provide an explanation for why no site inspections of the municipal sites were performed.

City of Boynton Beach

- 1) Section VII, Part III.A.9.b "Construction Site Runoff – Inspection and Enforcement": The permittee reported "7" construction site plan / permit application reviews (private sites), "1" construction site plan review (municipal site) and "7" construction site inspections (private sites) and "1" construction site inspection (municipal site). Please provide an explanation for why so few site inspections were performed.

**Note: This was also a Year 7 Annual Report Comment.*

Town of Cloud Lake

No additional information is needed.

City of Delray Beach

- 1) Section VII, Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal": The permittee reported "0" investigations of suspected illicit connection / discharge / dumping reports, but reported "4" reports received of suspected illicit connections / discharges / dumping in Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting." Please clarify this discrepancy.

Florida Department of Transportation (FDOT) District Four

- 1) Section VII, Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal": The permittee reported "14" investigations of suspected illicit connection / discharge / dumping reports, but reported "55" reports received of suspected illicit connections / discharges / dumping in Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting." Please clarify this discrepancy.

FDOT Florida's Turnpike Enterprise

No additional information is needed.

City of Greenacres

- 1) Section VII, Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal": The permittee reported "1" investigation of suspected illicit connection / discharge / dumping reports, but reported "3" reports received of suspected illicit connections / discharges / dumping in Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting." Please clarify this discrepancy.

- 2) Section VII, Part III.A.9.a "Construction Site Runoff – Site planning and Non-Structural and Structural Best Management Practices": The permittee reported "0" construction site plan / permit application reviews (municipal site) and "1" construction site inspection (municipal site). Please clarify this discrepancy and explain why only one inspection was performed.
- 3) Section VII, Part III.A.9.c "Construction Site Runoff – Site Operator Training": The permittee reported "0" for the number of building permit applicants notified. However, the permittee also reported under Part III.A.9.a that "3" construction projects (private sites) required an NOI. Please provide an explanation for why the permittee did not notify building permit applicants of their responsibilities under the State NPDES stormwater permitting program for construction site runoff.

**Note: This was also a Year 3, Year 4, Year 5, Year 6, and Year 7 Annual Report Comment. Please note that it is unacceptable to not address these required improvements and this could lead to enforcement actions in the future. The Department will closely focus on this area as you develop your plan for inspecting construction sites as required in the new permit.*

Town of Gulf Stream

- 1) Section VII, Part III.A.9.b "Construction Site Runoff – Inspection and Enforcement": The permittee reported "9" construction site plan / permit application reviews (private sites) and "2" construction site inspections (private sites). Please provide an explanation for why so few site inspections were performed.

**Note: This was also a Year 7 Annual Report Comment. Given that this is the second consecutive year with a required improvement for this element, please note that this will be an area the Department will focus on as you develop and implement the requirements in your new permit for inspecting construction sites.*

Town of Haverhill

- 1) Section VII, Part III.A.7.a "Illicit Discharges and Improper Disposal – Inspections, Ordinances, and Enforcement Measures": The permittee reported "0" proactive inspections with the comment "Proactive inspections occur while performing inlet / catch basin / grate inspections." Please confirm that the "620" inspections of inlets included checking for illicit connections / discharges / dumping and provide a sample of the inspection documentation.

Town of Highland Beach

No additional information is needed.

Indian Trail Improvement District

- 1) Section VII, Part III.A.8.a "Industrial and High-Risk Runoff – Identification of Priorities and Procedures for Inspections": The permittee reported "0" total high risk facilities and "1" high risk facility inspection. Please clarify this discrepancy.

Town of Juno Beach

- 1) Section VII, Part III.A.9.b "Construction Site Runoff – Inspection and Enforcement": The permittee reported "0" construction site plan / permit application reviews (private sites) and "15" construction site inspections (private sites). Please clarify this discrepancy.

Town of Jupiter

No additional information is needed.

Town of Jupiter Inlet Colony

- 1) Section VII, Part III.A.3 "Roadways": The permittee reported "0" trash pick-up events. Please provide an explanation of why no events occurred.

**Note: This was also a Year 7 Annual Report Comment. Given that this is the second consecutive year with a required improvement for this element, please note that this will be an area the Department will focus on as you develop and implement the requirements in your new permit for litter removal.*

Town of Lake Clarke Shores

No additional information is needed.

Town of Lake Park

No additional information is needed.

City of Lake Worth

- 1) Section VII, Part III.A.3 "Roadways": The permittee reported "4" municipal equipment yards and maintenance shops and "194" inspections. However, three facilities were listed with the comment "180 inspections of 1880 2nd Ave North and 194 inspections of 1749 3rd Ave South." Thus, it appears there were 374 inspections of two facilities. Please provide a list of the names and locations of each of the four facilities reported, and the number of inspections conducted at each facility.
- 2) Section VII, Part III.A.6 "Pesticides, Herbicides, and Fertilizer Application": The permittee reported "6" neighborhood presentations but reported "Martin Cybulski spoke to four homeowners associations" in Column D and "Martin Cybulski speaks to about four to six Homeowners Associations during the course of each permit year" in Column F. Please clarify the discrepancy and report the actual number of presentations given during the Year 8 reporting year.
- 3) Section VII, Part III.A.7.d "Illicit Discharges and Improper Disposal – Spill Prevention and Response": The permittee reported "0" spills responded to and commented "Fire Department still looking for this year's report. The City has been replaced with the Palm Beach County Fire Department." Please report the number of hazardous and non-hazardous spills responded to that affected the MS4.
- 4) Section VII, Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting": The permittee reported "0" citizen reports but Column F contained the comment "Pool being drained to alley and Service Station washing down coolant into catch basin. Employee also a resident." This same comment appeared in the Year 6 Annual Report. Please clarify this discrepancy in the reporting, as these appear to be citizen reports, and explain how the same two incidents occurred in both Year 6 and Year 8.
- 5) Section VII, Part III.A.7.f "Illicit Discharges and Improper Disposal – Oils, Toxics, and Household Hazardous Waste Control": The permittee reported "0" for total percentage of storm sewer inlets stenciled but commented "We have stenciled in the past and the City of Lake Worth is 70% completed." Please clarify this discrepancy in the reporting.

Town of Lantana

No additional information is needed.

Town of Manalapan

No additional information is needed.

Town of Mangonia Park

- 1) Section VII, Part III.A.1 "Structural Controls and Stormwater Collection Systems Operation": The permittee reported "0" inspection activities for the following structures: stormwater treatment ponds and exfiltration trenches with the comment "None required." Table II.A.1.a of the permit requires semi-annual inspections of stormwater treatment ponds (dry retention) and of exfiltration trenches. The permittee has reported inspections of these structures in past annual reports. Please provide an explanation of why no inspections were conducted.
- 2) Section VII, Part III.A.1 "Structural Controls and Stormwater Collection Systems Operation": The permittee reported "10" inspection activities for inlets / catch basins / grates in the Year 8 Annual Report, but "319" inspection activities in the Year 7 Annual Report. Please provide an explanation of the steep decrease in inspections.
- 3) Section VII, Part III.A.3 "Roadways": The permittee reported "0" for street sweeping activities and commented "Town currently has no street sweeping program – PBC sweeps 45th Street and Australian Avenue (County maintained roads) within corporate limits." However, the permittee reported street sweeping activities conducted by the Mangonia Park Utility Department, Building Department, and Public Works in its Year 7 Annual Report. Please provide an explanation of the demise of the street sweeping program and recognize that this is a required BMP in the new permit.
- 4) Section VII, Part III.A.3 "Roadways": The permittee reported "0" for litter collection activities and commented "Businesses and residences are responsible to keep swales free of trash and debris." In addition, the permittee reported "0" trash pick-up events. However, the permittee reported litter collection activities conducted by the Mangonia Park Utility Department, Building Department and Public Works, and two trash pick-up events in its Year 7 Annual Report. Please provide an explanation of the demise of the litter collection program and recognize that this is a required BMP in the new permit.

Village of North Palm Beach

- 1) Section VII, Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal": The permittee reported "1" investigation of suspected illicit connection / discharge / dumping reports, but reported "0" reports received of suspected illicit connections / discharges / dumping in Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting." The permittee also reported "1" illicit connection / discharge / dumping found from proactive inspections in Part III.A.7.a "Illicit Discharges and Improper Disposal – Inspections, Ordinances, and Enforcement Measures." Please clarify whether the 1 investigation was a follow-up to the 1 illicit connection / discharge / dumping discovered during the 1 proactive inspection. Furthermore, your Year 7 Permit Assessment letter contained a "Required Improvement" to begin to conduct proactive inspections. Please provide an explanation of why this required improvement was not implemented in the Year 8 reporting period.

**Note: Given that this is the second consecutive year with a required improvement for this element, please note that this will be an area the Department will focus on as you develop and implement the requirements in your new permit for illicit discharges.*

- 2) Section VII, Part III.A.9.c "Construction Site Runoff – Site Operator Training": The permittee left Column C blank for the following reporting item: Number of building permit applicants notified. Please provide the number of building permit applicants notified.

Northern Palm Beach County Improvement District

- 1) Section VII, Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal": The permittee reported "2" investigations of suspected illicit connection / discharge / dumping reports, but reported "0" reports received of suspected illicit connections / discharges / dumping in Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting." The permittee also reported "2" illicit connections / discharges / dumping found from proactive inspections in Part III.A.7.a "Illicit Discharges and Improper Disposal – Inspections, Ordinances, and Enforcement Measures." Please clarify whether the 2 investigations were follow-up to the 2 illicit connections / discharges / dumping discovered during the proactive inspections.
- 2) Section VII, Part III.A.9.b "Construction Site Runoff – Inspection and Enforcement": The permittee reported "15" construction site plan / permit application reviews (private sites) and "0" construction site inspections (private sites). Please provide an explanation for why no site inspections were performed. Please note that inspecting construction sites is a required element in your previous permit and in your new permit.

Town of Ocean Ridge

- 1) Section VII, Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal": The permittee reported "204" investigations of suspected illicit connection / discharge / dumping reports, but reported "0" reports received of suspected illicit connections / discharges / dumping in Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting." Please clarify this discrepancy.

City of Pahokee

- 1) Section VII, Part III.A.3 "Roadways": The permittee reported "bulk" for the following reporting item: Trash Pick-up Events: Amount of litter collected (bags) with the comment "bulk trash collection" and the entity is "outsourced contractor." Please provide an estimated quantity of litter collected or the procedures that will be implemented in the following reporting period to obtain the quantity of litter collected from trash pick-up events.
- 2) Section VII, Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal": The permittee reported "2" investigations of suspected illicit connection / discharge / dumping reports, but reported "0" reports received of suspected illicit connections / discharges / dumping in Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting." The permittee also reported "2" illicit connections / discharges / dumping found from proactive inspections in Part III.A.7.a "Illicit Discharges and Improper Disposal – Inspections, Ordinances, and Enforcement Measures." Please clarify whether the 2 investigations were follow-up to the 2 illicit connections / discharges / dumping discovered during the proactive inspections.

Town of Palm Beach

- 1) Section VII, Part III.A.5 "Municipal Waste Treatment, Storage, and Disposal Facilities Not Covered by an NPDES Stormwater Permit": The permittee reported one facility – the Pinewalk Transfer Station. However, the Year 6 and Year 7 Permit Assessment letters contained a "Required Improvement" to begin to perform and document stormwater site inspections of the Public Works Maintenance facility, located at 951 S. Old Okeechobee Road, West Palm Beach, and ensure the documentation of the site inspections reflects inspection of stormwater-related concerns and that the appropriate stormwater best management practices, particularly for the waste-related areas, are being implemented. The permittee was informed that the same inspection may satisfy both the Part III.A.3 and Part III.A.5 permit requirements, and to report the inspections conducted of this facility under both Parts. Please confirm whether any inspections of the waste-related areas of the Public Works Maintenance facility were performed and documented.
- 2) Section VII, Part III.A.7.d "Illicit Discharges and Improper Disposal – Spill Prevention and Response": The permittee left Column C blank for the following reporting item: Personnel trained. Please provide the number of personnel trained on spill prevention and response procedures during the Year 8 reporting period.
- 3) Section VII, Part III.A.9.b "Construction Site Runoff – Inspection and Enforcement": The permittee reported "172" construction site plan / permit application reviews (private sites) and "98" construction site inspections (private sites). Please provide an explanation for why so few site inspections were performed.
- 4) Section VII, Part III.A.9.c "Construction Site Runoff – Site Operator Training": The permittee reported "1" for the following reporting item: Number of building permit applicants notified. The permittee commented that "Applicants are notified individually during building permit plan review." Since you reported "172" site plan reviews and "3" projects requiring a Notice of Intent (NOI), please clarify this discrepancy.

Palm Beach County

- 1) Section VII, Part III.8.a "Industrial and High-Risk Runoff - Identification of Priorities and Procedures for Inspections": The permittee reported "4" total high risk facilities and "4" new high risk facilities with the comment "The basis for including these facilities was provided by FDEP during the Year 7 Permit Assessment." In the Year 7 Annual Report, the County had reported "37" total high risk facilities with the comment "commercial / industrial facilities with existing monitoring requirements." The Year 7 Permit Assessment letter contained a "Required Improvement" to use the definition of a high risk facility included in Part II.A.8 "Industrial and High Risk Runoff" of the permit and to include in your high-risk industrial facilities inventory any facility listed on the EPA TRI that was located within the unincorporated portion of the County. The Department did not advise you to remove any facilities from your inventory unless they did not meet the definition of a high risk facility, which includes any other industrial or commercial discharge that the permittee determines is contributing a substantial pollutant loading to the MS4. Please confirm that you have dropped the 37 facilities previously reported from your inventory, the basis for why they were previously considered high risk facilities and the basis for removing them from the inventory.
- 2) Section VII, Part III.A.9.b "Construction Site Runoff – Inspection and Enforcement": The permittee reported "163" construction projects requiring a Notice of Intent (private sites), "45" construction site plan / permit application reviews (private sites) and "56" construction site inspections (private sites) with the comment "Construction activity was mostly limited to commercial property." Please provide the number of active construction sites during the reporting period and an explanation for why so few site inspections were performed.

City of Palm Beach Gardens

- 1) Section VII, Part III.A.3 "Roadways": The permittee reported "as needed basis" for the frequency of litter collection activities. Please provide the actual frequency or number of activities that occurred during the reporting period.

**Note: This was also a Year 7 Annual Report Comment. Given that this is the second consecutive year with a required improvement for this element, please note that this will be an area the Department will focus on as you develop and implement the requirements in your new permit for litter removal.*

- 2) Section VII, Part III.A.5 "Municipal Waste Treatment, Storage, and Disposal Facilities Not Covered by an NPDES Stormwater Permit": The permittee reported "0" facilities. However, in the Year 7 Permit Assessment and Audit Report the permittee was informed that the Fleet Maintenance and Storage facility, located at 3704 Burns Road was covered under Part III.A.5. Please confirm whether any inspections of the waste-related areas of the Fleet Maintenance and Storage facility Public Works Maintenance facility were performed and documented.

Town of Palm Beach Shores

No additional information is needed.

Village of Palm Springs

- 1) Section VII, Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal": The permittee reported "1" investigation of suspected illicit connection / discharge / dumping reports, but reported "0" reports received of suspected illicit connections / discharges / dumping in Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting." Please clarify this discrepancy.

City of Riviera Beach

- 1) Section VII, Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal": The permittee reported "0" investigations of suspected illicit connection / discharge / dumping reports, but reported "18" reports received of suspected illicit connections / discharges / dumping in Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting." Please clarify this discrepancy.
- 2) Section VII, Part III.A.8.a "Industrial and High-Risk Runoff – Identification of Priorities and Procedures for Inspections": The permittee reported "7" total high risk facilities, "7" new high risk facilities, "7" high risk facility inspections and a comment "Inspect June 09." The permittee also reported "7" new high risk facilities in the Year 7 Annual Report. Please clarify whether the "7" new high risk facilities are the same facilities reported in the Year 7 Annual Report. If these are new facilities identified during the Year 8 reporting period, then please clarify whether the total number of high risk facilities should actually be 14 (the 7 new facilities from Year 7 and the 7 new facilities from Year 8).

Village of Royal Palm Beach

- 1) Section VII, Part III.A.9.b "Construction Site Runoff – Inspection and Enforcement": The permittee reported "1" construction site plan / permit application review (private sites) and "0" construction site inspections (private sites). Please provide an explanation for why no site inspections were

performed. Please note that inspecting construction sites is a required element in your previous permit and in your new permit.

City of South Bay

- 1) Please provide a copy of the Year 1 Annual Report with an original signature in Section VI by the Responsible Authority for the permit, which you indicated in Section I.E is Mayor Shirley Walker-Turner.
- 2) Section VII, Part III.A.3 "Roadways": The permittee reported "0" trash pick-up events. Please provide an explanation of why no trash pick-up events occurred. Please note that litter control is a required element in your previous permit and in your new permit.

South Indian River Water Control District (SIRWCD)

No additional information is needed.

Town of South Palm Beach

No additional information is needed.

Village of Tequesta

- 1) Section VII, Part III.A.7.a "Illicit Discharges and Improper Disposal – Inspections, Ordinances, and Enforcement Measures": The permittee reported "100" proactive inspections but "N/A" for the number of illicit connections / discharges / dumping found. Please clarify that "0" illicit connections / discharges / dumping were found out of the 100 proactive inspections conducted.
- 2) Section VII, Part III.A.7.d "Illicit Discharges and Improper Disposal – Spill Prevention and Response": The permittee reported "N/A" for the number of spills responded to and commented "Tequesta Fire Rescue handles all spill responses." Please provide information obtained from the Tequesta Fire Rescue regarding the number of spills responded to and whether any of these spills affected the MS4.
- 3) Section VII, Part III.A.9.b "Construction Site Runoff – Inspection and Enforcement": The permittee did not report the number of construction site inspections conducted. Since the permittee reported "0" construction site plan / permit application reviews, please confirm that there were "0" inspections because there were no active construction sites.

Village of Wellington

- 1) Section VII, Part III.A.7.e "Illicit Discharges and Improper Disposal – Public Reporting": The permittee reported "4" suspected illicit connection / discharge / dumping reports received but does not appear to have reported the investigations and findings of these cases (#329, #435, #909, and #1286) under Part III.A.7.c "Illicit Discharges and Improper Disposal – Investigation of Suspected Illicit Discharges and / or Improper Disposal." Please clarify this discrepancy in the reporting.

City of West Palm Beach

No additional information is needed.