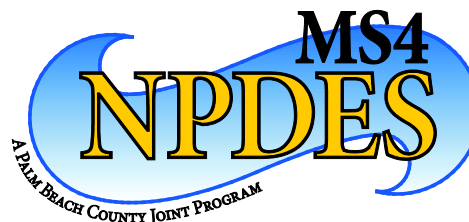


# Palm Beach County NPDES

Northern Palm Beach County Improvement District  
359 Hiatt Drive  
Palm Beach Gardens, FL 33418  
www.pbco-npdes.org



October 6, 2011

Mr. Eric H. Livingston  
Florida Department of Environmental Protection  
NPDES Stormwater Section  
2600 Blair Stone Road  
Mail Station 2500  
Tallahassee, Florida 32399-2400

Ref. No. B1050.03  
Subject: TMDL Prioritization Report Palm Beach County MS4s

Dear Mr. Livingston:

Pursuant to the Third Term Permit Municipal Separate Storm Sewer Permit for Palm Beach County permittees issued March 2, 2011, Palm Beach County permittees are required to develop a TMDL Prioritization Report for established EPA TMDLs and adopted Florida Department of Environmental Protection TMDLs. As of March 2, 2011 date, there are no FDEP adopted TMDLs and EPA has seven established TMDLs (all in the Lake Okeechobee Basin). These TMDLs and the Palm Beach County MS4 permittees with facilities within the TMDL Water Body Identification boundaries (WBID) are identified in the Table 1 below.

**Table 1**  
**EPA's TMDLs in Palm Beach County as of March 2, 2011**

WBID	Segment Name	Basin	Constituent	TMDL	Percent Reduction	Date	MS4s
3233	L8 Canal	Lake Okeechobee	Turbidity	32 (NTU)	52	03/29/2007	Indian Trail I.D., PBC
3244	East Beach	Lake Okeechobee	Turbidity & TSS	32 (NTU) 33 (MG/l)	12 0	03/29/2007	Pahokee, FDOT, PBC
3238	West Palm Beach Canal	Lake Okeechobee	Turbidity & TSS	32 (NTU) 33 (MG/l)	66 0	03/29/2007	Pahokee, FDOT, PBC
3247	715 Farms	Lake Okeechobee	Turbidity & TSS	32 (NTU) 33 (MG/l)	0 0	03/29/2007	FDOT, PBC
3248	N. New River Canal	Lake Okeechobee	Turbidity & TSS	32 (NTU) 33 (MG/l)	0 0	03/29/2007	South Bay, Belle Glade, FDOT, PBC
3251	S-3	Lake Okeechobee	Turbidity	32 (NTU)	0	03/29/2007	FDOT, PBC
3212 D, E, G	Lake Okeechobee	Lake Okeechobee	Iron	0.3 (mg/l)	51	02/23/2005	None

One TMDL is for Iron and the identified WBIDs are all within Lake Okeechobee. In EPA's report dated September 2011 and titled "Iron Total Maximum Daily Load (TMDL) Lake Okeechobee", it was recognized that there are no MS4 permittees that discharge into the three WBIDs associated with this TMDL. Review of the information from Palm Beach County MS4 permittees confirmed this. The remaining six TMDLs are associated with impairment for turbidity. These TMDLs will be the subject of this prioritization report.

A meeting was held on October 4, 2011 with the stakeholder MS4 permittees to prioritize the six TMDLs. All stakeholder MS4 permittees identified in Table 1 were invited to the meeting. The only entity not in attendance was the City of Pahokee. The attendance sheet and an agenda for the meeting are attached.

The meeting attendees discussed the factors to be considered for prioritizing the TMDLs. Since all the WBIDs are within the same Basin, and have the same impairment, no priority waterbody or priority impairment could be used as a basis of establishing priority. However, the group agreed that the following three factors would be considered for establishing priority: (1) amount of MS4 contributing drainage area; (2) percent reduction required; (3) number of outfalls discharging to the WBID. The amount of MS4 contributing area was determined by extracting land use information from the EPA Report (Total Maximum Daily Load for Turbidity and TSS in the Lake Okeechobee Watershed Tributaries Palm Beach County, Florida, dated September 2006). The higher the percentage of MS4 area to overall WBID area, the lower the ranking. The higher the percentage of reduction required to meet the TMDL, the lower the rank. The lower the number of MS4 outfalls within the WBID the higher the ranking. Each ranking factor was given an equal weight and the TMDL with the lowest final score was identified as the top priority TMDL. Table 2 below provides the summary of this information.

**Table 2**  
**Priority Ranking of the Lake Okeechobee Basin TMDLs by WBID**

WBID	Segment Name	Drainage Area	Percent Reduction	Lowest Number of Outfalls	Score	Priority Ranking	Tentative Schedule for Monitoring and Assessment Plan
3233	L8 Canal	1	2	1	4	1	March 2, 2012
3238	West Palm Beach Canal	3	1	6	10	2	March 2, 2013
3244	East Beach	4	3	3	10	3	March 2, 2013
3247	715 Farms	5	4	2	11	4	March 2, 2013
3248	N. New River Canal	2	5	5	12	5	March 2, 2014
3251	S-3	6	6	4	16	6	March 2, 2014

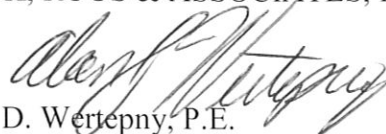
For all six of the TMDLs, it is clear that the MS4 discharges to these WBIDs is a small percentage of the overall contributing drainage area. All Palm Beach County MS4 permittees have implemented Best Management Practices (BMPs) to reduce turbidity, sediment, and erosion from entering and leaving their MS4. The MS4s believe these existing controls are sufficient to meet EPA's proposed TMDLs. As stated in the MS4 permit, the permittees will address only the contribution from their MS4. The monitoring and assessment plan will address only the discharges from the MS4s to these WBIDs. Components of the monitoring and assessment plan will include description of the contributing drainage area, the MS4 existing sediment and erosion controls (i.e., BMPs), and the proposed monitoring to confirm that the implemented BMPs are sufficient. Monitoring will include a representative outfall for each of the WBIDs. For the top priority TMDL WBID 3233 (the L-8 Canal), there is only one MS4 outfall. It is the responsibility of Indian Trail Improvement District (ITID). The attached exhibit identifies the boundary for WBID 3233 and the contributing ITID drainage area. The majority of ITID runoff is collected through swales and stormwater pipe systems discharging into interconnected canal systems, and is then pumped into a 720-acre reservoir, which in turn discharges by gravity bleeder at a rate of one-quarter inch per day. To demonstrate that turbidity levels are not being exceeded, ITID has agreed to provide ambient water quality monitoring of their outfall. The stakeholders at the meeting proposed that 12 samples would be sufficient, perhaps a monthly sampling program for one year. Details of this monitoring and assessment plan will be included as a separate report with the ITID 1<sup>st</sup> Year, Third Term Permit, Annual Report, due March 2, 2012. Coordination on the Assessment Plan will be provided through Mock•Roos as the Consultant to the Palm Beach County NPDES Steering Committee.

Stakeholders agreed that the monitoring and assessment plan for the next three ranked WBID TMDLs (West Palm Beach Canal, East Beach, and 715 Farms) would be included with the 2<sup>nd</sup> Year Annual Report, due March 2, 2013. With the 3<sup>rd</sup> Year Annual Report, due March 2, 2014, the remaining two WBID TMDLs will be included. Stakeholders also agreed to provide information by March 2, 2012 on their existing stormwater systems in this area (this included outfall inventory, contributing drainage area, mapping, etc.). This information will be utilized to select a representative outfall in each of the WBIDs for future monitoring and assessment plans.

If you have any questions regarding the above information, please contact me at (561) 683-3113, extension 231.

Sincerely,

MOCK, ROOS & ASSOCIATES, INC.



Alan D. Wertepny, P.E.

Palm Beach County MS4 Coordinator

ADW:jeh

Copies: All Attendees (Via Email Only)

# Palm Beach County NPDES

Northern Palm Beach County Improvement District  
359 Hiatt Drive  
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## TMDL Workshop October 4, 2011 Attendance List

Name	Representing	Email
Anne Capelli	Mock•Roos	<a href="mailto:anne.capelli@mockroos.com">anne.capelli@mockroos.com</a>
Alan Wertepny	Mock•Roos	<a href="mailto:alan.wertepny@mockroos.com">alan.wertepny@mockroos.com</a>
Pearl Breckenridge	E Sciences/FDOT District Four	<a href="mailto:pbeckenridge@esciencesinc.com">pbeckenridge@esciencesinc.com</a>
Ivette Leiva	FDOT District Four	<a href="mailto:ivette.leiva@dot.state.fl.us">ivette.leiva@dot.state.fl.us</a>
Brian Gentry	PBC ERM	<a href="mailto:bgentry@pbcgov.org">bgentry@pbcgov.org</a>
Jack Horniman	Consultant	<a href="mailto:jla_a@yahoo.com">jla_a@yahoo.com</a>
Karen Brandon	AECOM/Belle Glade	<a href="mailto:karen.brandon@aecom.com">karen.brandon@aecom.com</a>
Anthony LasCasas	ITID	<a href="mailto:alascasas@indiantrail.com">alascasas@indiantrail.com</a>
Henry Shaw	ITID	<a href="mailto:hshaw@indiantrail.com">hshaw@indiantrail.com</a>
Edgar W. Kerr	City of South Bay	<a href="mailto:kerre@southbaycity.com">kerre@southbaycity.com</a>

# Palm Beach County NPDES

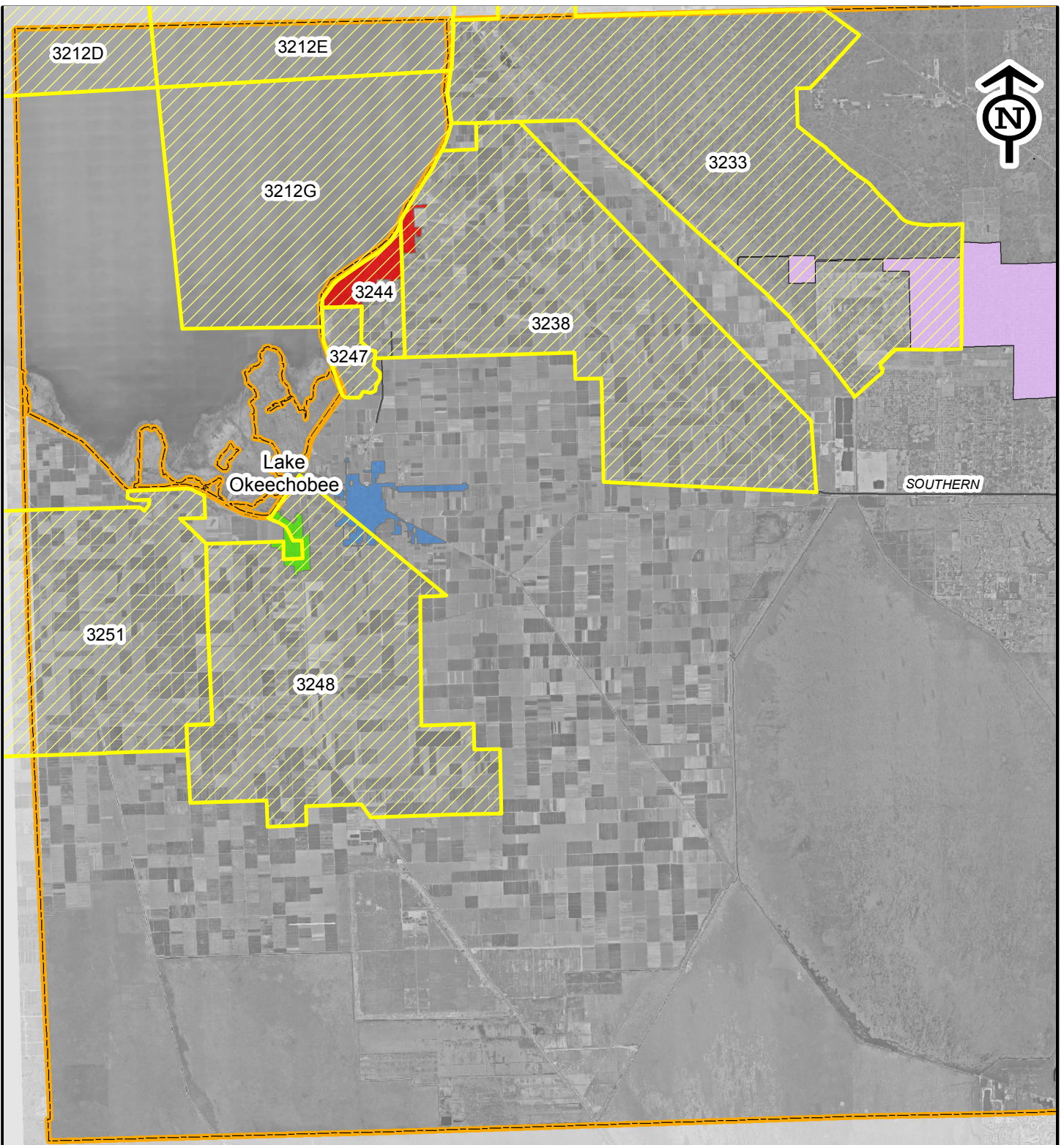
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**AGENDA  
PALM BEACH COUNTY  
TMDL WORKSHOP  
EPA'S ESTABLISHED TMDLs FOR THE WESTERN COMMUNITIES  
MOCK•ROOS OFFICES  
TUESDAY, OCTOBER 4, 2011  
10:00 A.M. – 12:00 P.M.  
(Ref. No. B0040.03)**

The agenda for the meeting is as follows:

- I. Introductions
- II. Overview of Permit Requirements and Time Tables
- III. EPA's Established TMDLs (Turbidity and Total Suspended Solids) – Six WBIDs
- IV. Evaluation Factors for Prioritization
- V. Prioritize the Six WBIDs
- VI. Discuss Monitoring – Existing and Proposed MS4 Outfall Monitoring
- VII. Proposed Schedule of Monitoring and Assessment Plan for the six WBIDs
- VIII. Next Meeting



### Legend

- Indian Trail Improvement District
- Belle Glade
- Pahokee
- South Bay
- Palm Beach County Boundary