



City of Greenacres

Public Works Department  
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Samuel J. Ferreri  
Mayor  
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May 28, 2008

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REC'D PA. # \_\_\_\_\_

Mr. Steven Michael Kelly  
NPDES Stormwater Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Palm Beach County Municipal Separate Storm Sewer System (MS4)  
NPDES Permit No. FLS000018  
Year 5 Audit Notification and Annual Report Comments

Dear Mr. Kelly,

The City of Greenacres respectfully submits the following reply to comments to the letter dated April 25, 2008 regarding the NPDES Permit No. FLS000018 submittal.

- 1) Section VII, Part III.A.7.a Illicit Discharges and Improper Disposal - Inspections, Ordinances, and Enforcement Measures: Please provide an explanation of why no pro-active inspections for suspected illicit connections/discharges/dumping occurred.

*The Public Works Department, while performing routine maintenance in the drainage alleyways located adjacent to residents' backyards and within banks of various canals located within City boundaries, did not discover any illicit connections, discharges, or illegal dumping on public property. This routine maintenance, which includes visual inspections, was not previously classified as pro-active inspections by the roads and drainage supervisor, but will be noted as such in future reports.*

- 2) Section VII, Part III.A.7.c Illicit Discharges and Improper Disposal - Investigation of Suspected Illicit Discharges and/or Improper Disposal: The City reported "0" training activities and commented "A system for investigations, fines, record retention, and reporting by the Building Department shall be proposed and implemented in FY 08." Please provide an explanation of why no training occurred and confirm if the Building Department inspectors are trained to perform illicit discharge and improper disposal inspections.

Upon further research and clarification, the City is pleased to report that there were 20 Public Works staff members trained on January 19, 2007, in a course titled "Storm Watch - Municipal Stormwater Pollution Prevention" that was provided by the Palm Beach County NPDES Steering Committee. The course provided a module on illicit discharge and disposal inspections.

The City's Chief Building official, Mr. Michael Grimm, Qualified Stormwater Inspector #2125, has been certified since October 10, 2001. Since the beginning of FY 2008 (October 1, 2008 to September 30, 2008), 3 Building Inspectors have been certified.

- 3) Section VII, Part III.A7.d Illicit Discharges and Improper Disposal - Spill Prevention and Response: The City commented "A system for investigations, fines, record retention, and reporting by the Building Department shall be proposed and implemented in FY 08." Please confirm if the Building Department inspectors are trained to perform spill prevention and response activities.

*This was misreported. The Chief Building official, Mr. Michael Grimm, Qualified Stormwater Inspector #2125, has been certified since October 10, 2001. Since the beginning of FY 2008 (October 1, 2008 to September 30, 2008), 3 Building Inspectors have been certified.*

- 4) Section VII, Part III.A.9.c Construction Site Runoff - Site Operator Training: The City reported "0" for the number of building permit applicants notified. However, the City also reported under Part III.A.9.a that "4" construction projects required an NOI. Please provide an explanation for why the City did not notify building permit applicants of their responsibilities under the State NPDES permitting program for construction site runoff.

*In FY 2007, the Planning and Engineering Department received 29 permit applications, 4 site plan requests, 7 requests for annexations, 9 zoning changes, and 518 building permit reviews which were required to submit a construction*

I hope that you find the replies to the comments to be satisfactory. If you have any questions or comments, please feel free to contact me at (561) 642-2074.

Sincerely,



Carlos J. Cedeño  
Public Works Director

Cc:  
Allen Wertepny, Mock Roos & Associates