



Public Works Department
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City of Greenacres

May 27, 2009

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 6 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 – Enforcement Measures: Please provide an explanation of why no pro-active inspections for suspected illicit connections/discharges/dumping occurred.

The number reported, "0", was incorrect. Inspections performed as part of the local Business tax receipt process were not included. Inspectors use a checklist that includes an illicit discharge component for these inspections. There were 366 Business Tax Receipts inspections during the report's timeframe. Building Inspectors are also inspecting for residential illicit discharges during their code enforcement inspections. Seventy-eight (78) residential properties were inspected during the reporting period.

- 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" 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 proved 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, 2007 to September 30, 2008), 3 Building Inspectors and 1 permit technician have been certified.

- 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 "11" construction projects required an NOI. Please provide an explanation for why the permittee did not notify building permit applicants of their responsibilities under the State NPDES permitting program for construction site runoff.

All proposed development in the City goes through a lengthy Land Development approval process which includes developer notification of their NPDES responsibilities at a very early stage. Due to the economy there were no sites requiring coverage under the Generic Permit that continued the process to obtain building permits. Out of the 11 sites reported, 8 were existing sites already under construction and the other 3 received notifications through the Land Development approval process during the prior report. Furthermore, contractors are notified of any deficiencies in their Pollution Prevention Plan during the building plan review process and again notified of their NPDES responsibilities during pre-construction meetings. These notifications were not counted as they are additional notifications to the same contractor. Notifications to contractors for smaller sites that do not require the use of the Generic permit have not been counted. A system to count these is being developed

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 I. Cedeño
Public Works Director

Cc:

Allen Wertepny, Mock Roos & Associates
Michael Grimm, City of Greenacres Chief Building Official
Wade Neilson, Roads & Drainage Supervisor