



May 8, 2012

Kenneth Kuhl
Environmental Specialist
NPDES Stormwater Section
Florida Department of Environmental Protection
2600 Blair Stone Road - MS2500
Tallahassee, FL 32399-2400

RE: Year 1 AR Cycle 3 Request for Additional Information - Boca Raton

Dear Mr. Kuhl:

1. Section VII, Part III.A.8.a of the Annual Report form requires permittees to inventory high risk facilities and inspect facilities according to priorities and schedules contained in the City's Standard Operating Procedures (existing or new). Provide the number of inspections performed during the reporting period or explain why inspections have not been performed in Column F "Comments" of the Annual Report.

The City did not complete any inspections during the 7-month first year reporting period (March 2, 2011 - September 30, 2011). As noted in the AR Form, the prioritization and inspection schedule was still being formulated during the shortened first year period. The permit requires that all high risk facilities be inspected at least once during the permit term and this will occur as required in the remaining four years of the permit term. Attached is the City's SOP for the high risk facility inspection program.

Should you have any additional questions, please don't hesitate to contact me.

City Of Boca Raton
Municipal Services

Sincerely,

A handwritten signature in blue ink, appearing to read "Anthony J. Puerta", is written over a horizontal line. The signature is stylized with a large, sweeping loop.

Anthony J. Puerta
Stormwater Manager

cc: Patrick J. Bardes, City of Boca Raton
Anne Marie Capelli, Mock Roos and Associates

City of Boca Raton
High Risk Facilities Inspection Program
Standard Operating Procedures

1. An up-to-date inventory

The inventory is updated as follows:

- Hazardous Waste TSDR facilities and the facilities subject to EPCRA Title III, Section 313 are queried on EPA's envirofacts website (www.epa.gov/enviro/). The three "Program Systems" queried are RCRAInfo, CERCLIS, and TRIS.
- Additional facilities are added as deemed appropriate during the proactive inspections for illicit discharges.
- Boca Raton does not have any operating municipal landfills

The inventory is updated annually.

The inventory is cross-referenced with facilities that have an MSGP. Facilities that do not have the MSGP, but appear to require one, are referred to FDEP for follow-up.

2. Procedure Prioritizing Facilities

Facilities added to the High Risk Facility inventory as a result of an unfavorable pro-active illicit inspection or prior high risk facility inspection are considered a priority and are inspected more frequently than other facilities. The balance of the high risk facilities are divided into three geographic zones within the City of Boca Raton. Inspections of all High Risk facilities are carried out on a three year cycle.

3. Procedure for conducting site inspections

All High Risk facilities are inspected once every three years starting in year two of the current permit (FLS000018-003). The High Risk facilities are broken down into three zones based on geography. Facilities listed in Zone one will be inspected during the second year of the current permit. The facilities in Zone two will be inspected in year 3 of the current permit. Finally, facilities listed in Zone three will be inspected in year four of the current permit. This process will remain on a three year cycle. Inspection forms (see attached) are used for the facility inspections. Information available ahead of time is filled in before going into the field.

The inspector conducts a visit to the facility. The inspection form is used to determine any stormwater non-compliance issues. Photo documentation is used to support the inspection form.

4. Procedures for enforcement actions (or referrals to appropriate jurisdictional authority)

If a problem is identified, the owner or operator of the property is contacted. They are notified of the problem and asked to address the situation immediately. The owner is notified of the re-inspection date, typically one week. An unresolved matter is handled by the Code Enforcement division. Code Enforcement assigns a case number and follows through to resolution. For cases

outside Boca's MS4, the appropriate entity is notified (FDOT, Palm Beach County, etc.) by the Stormwater Manager.

5. Procedure for documenting the inspections and enforcement activities

The attached inspection form is used for inspections and the subsequent follow-up. Photo documentation is also used to document the inspections. Selected activity related to the inspection program is logged into a database for management. The electronic files facilitate follow-up, referrals and year-end summarizing and are maintained by the Records Manager/Data Analyst.

6. Identification of staff /department/outside entity responsible for inspections/enforcement

The following staff members are responsible for the high risk facility inspections and enforcement activity.

Name	Department
Stormwater Manager	Municipal Services
Engineering Inspectors	Municipal Services
Streets Employees	Municipal Services
Records Manager/Data Analyst	Municipal Services
Code Enforcement Officer	Code Enforcement

7. Schedule for Training Inspectors

Annual training is provided for individuals whose job responsibility it is to conduct high risk facility inspections. The training is concurrent with the training for the Pro-active illicit discharge inspection program.

8. Description of resources allocated to implement this permit element

The City of Boca Raton has multiple staff members that participate in the High Risk Facility inspection program. The City uses Engineering Inspectors, Streets employees, CADD technicians, Records Manager/Data Analyst, and the Stormwater Manager to implement this permit requirement.



High Risk Facility Inspection Form

Date of Inspection: _____

Inspector Name: _____

Name of Business or Owner: _____

Address of Facility: _____

Identification of MS4 component that could receive discharge from this site: _____

Does type of business require an MSGP?

Yes___ No___

If yes, does this facility have one?

Yes___ No___

Findings:

Evidence of illicit connections to storm sewer?

Yes___ No___

Evidence of dumping/spills to storm sewer?

Yes___ No___

Evidence of wash water going to storm sewer?

Yes___ No___

Storage tanks leaking or improperly contained?

Yes___ No___

Stockpiles/debris piles uncontained?

Yes___ No___

If "yes," to any above, describe:

Type of Enforcement Action Taken: _____

Date to verify elimination: _____

Date of Referral to FDEP of facility that may require MSGP: _____