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April 18, 2012

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

Subject: Palm Beach County MS4 NPDES Permit FLS00018
Year 1, Cycle 3 – Response to Annual Report Comments
Town of Haverhill

Dear Mr. Kuhl:

The following information and revised annual report form are provided in response to comments in Eric Livingston's letter dated April 12, 2012:

- 1) Section VII, Part III.9 requires the permittee to report documentation titles and the entity performing permit activities, in Columns D and E, respectively, for each activity performed. Provide the information required in Columns D and E, Section VII, Part III.A.9.a & 9.b of the Annual Report form related to documentation titles and the responsible entity. In addition, provide the appropriate comments in Column F "Comments" of the same section to explain why required activities were not performed for the period.

The Annual Report has been revised in Section VII, Part III.A.9.a and 9.b to include the documentation titles and responsible entity. In addition, comments have been added to explain why activities were not performed for the period.

Should you have any questions, please feel free to call.

Sincerely,

Karen D. Brandon, P.E.

Encl.

cc: Joseph Roche
Janice Rutan
Alan Wertepny

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A.	B.		C.		D.	E.	F.
Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity		Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments	
	during the current reporting period					high risk facilities within the Town.	
	Operating municipal landfills	0	N/A	N/A	N/A	None	
	Hazardous waste treatment, storage, disposal and recovery (HWTSDR) facilities	0	N/A	N/A	N/A	None	
	EPCRA Title III, Section 313 facilities (that are not landfills or HWTSDR facilities)	0	N/A	N/A	N/A	None	
	Facilities determined as high risk by the permittee through the proactive inspections as per Part III.A.7.c	0	N/A	N/A	N/A	None	
	Other facilities determined as high risk by the permittee (that are <u>not</u> facilities identified through the proactive inspections)	0	N/A	N/A	N/A	None	
Part III.A.8.b	Industrial and High-Risk Runoff — Monitoring for High Risk Industries						
	Sampling of the discharge to the stormwater system may be required on an as-needed basis in the event that inspections of high-risk facilities disclose suspected illicit discharges to the MS4. New high-risk industrial facilities as defined in 40 CFR 122.26(d)(2)(iv)(C) must be evaluated to determine if the new discharge is contributing a substantial pollutant load to the MS4. The evaluation may include site-specific monitoring. Report the number of high risk facilities sampled.						
	High risk facilities sampled		0	N/A	N/A	There are no high risk facilities within the Town.	
Part III.A.9.a	Construction Site Runoff — Site Planning and Non-Structural and Structural Best Management Practices						
	Continue to implement the local codes or land development regulations and the written pre-construction site plan review procedures that require the use and maintenance of appropriate structural and non-structural erosion and sedimentation controls during construction to reduce the discharge of pollutants to the MS4. Report the number of permittee and private pre-construction site plans <u>reviewed</u> for stormwater, erosion, and sedimentation controls, and the number approved.						
	PERMITTEE SITES: Construction site plans reviewed		0	Construction Site Plan Review Log	Joe Roche, TOH Public Works	No construction site plans were submitted for review during report period.	
	PERMITTEE SITES: Construction site plans approved		0	Construction Site Plan Review Log	Joe Roche, TOH Public Works	No construction site plans were submitted for review during report period.	

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	PRIVATE SITES: Construction site plans reviewed	0	Construction Site Plan Review Log	Joe Roche, TOH Public Works	No construction site plans were submitted for review during report period.
	PRIVATE SITES: Construction site plans approved	0	Construction Site Plan Review Log	Joe Roche, TOH Public Works	No construction site plans were submitted for review during report period.
	Annually review (and revise, as needed) and implement the permittee's written procedures to notify all new development / redevelopment permit applicants of the need to obtain all required stormwater permits. Report the number of new development/redevelopment permit applicants notified of the ERP and CGP, and the number of applicants who confirmed ERP and CGP coverage.				
	Notified of ERP stormwater permit requirements	0	New Development/ Redevelopment Permit Notification Log	Joe Roche, TOH Public Works	There were no new dev/re-dev permit applicants during report period.
	Confirmed ERP coverage	0	New Development/ Redevelopment Permit Notification Log	Joe Roche, TOH Public Works	There were no new dev/re-dev permit applicants during report period.
	Notified of CGP stormwater permit requirements	0	New Development/ Redevelopment Permit Notification Log	Joe Roche, TOH Public Works	There were no new dev/re-dev permit applicants during report period.
	Confirmed CGP coverage	0	New Development/ Redevelopment Permit Notification Log	Joe Roche, TOH Public Works	There were no new dev/re-dev permit applicants during report period.
Part III.A.9.b	Construction Site Runoff — Inspection and Enforcement				
	As an attachment to the Year 1 Annual Report, the permittee shall submit a written plan that details the standard operating procedures for implementation of the stormwater, erosion and sedimentation inspection program for construction sites discharging stormwater to the MS4. The permittee shall implement the plan for inspecting construction sites immediately upon written approval by the Department. Prior to Department approval, the permittee shall continue to perform inspections in accordance with its previously developed construction site inspection procedures. Report on the inspection program for privately-operated and permittee-operated				

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construction sites, including the number of active construction sites during the reporting year, the number of inspections of active construction sites, the percentage of active construction sites inspected, and the number and type of enforcement actions / referrals taken.					
PERMITTEE SITES: Active construction sites PERMITTEE SITES: Inspections of active construction sites for proper stormwater, erosion and sedimentation BMPs PERMITTEE SITES: Percentage of active construction sites inspected PRIVATE SITES: Active construction sites PRIVATE SITES: Inspections of active construction sites for proper stormwater, erosion and sedimentation BMPs PRIVATE SITES: Percentage of active construction sites inspected Notices of Violation (NOVs) / warning letters / citations issued Stop Work Orders issued Fines issued Year 1 ONLY: Attach the written construction site inspection program plan					
		0	Construction Site Runoff Inspection & Enforcement Log	Joe Roche, TOH Public Works	No active construction sites.
		0	Construction Site Runoff Inspection & Enforcement Log	Joe Roche, TOH Public Works	No active construction sites.
		N/A	Construction Site Runoff Inspection & Enforcement Log	Joe Roche, TOH Public Works	No active construction sites.
		0	Construction Site Runoff Inspection & Enforcement Log	Joe Roche, TOH Public Works	No active construction sites.
		0	Construction Site Runoff Inspection & Enforcement Log	Joe Roche, TOH Public Works	No active construction sites.
		N/A	Construction Site Runoff Inspection & Enforcement Log	Joe Roche, TOH Public Works	No active construction sites.
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			Construction Site Runoff Inspection & Enforcement Log	Joe Roche, TOH Public Works	TOH working on development using PBC Steering Committee template
Part III.A.9.c	Construction Site Runoff — Site Operator Training				
	During Year 1 of the permit, develop and implement a written plan for stormwater training / outreach for construction site plan reviewers, site inspectors and site operators. Provide training for permittee personnel (employed by or under contract with the permittee) and private persons involved in the site plan review, inspection				