

April 20, 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
South Indian River Water Control District (SIRWCD)

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.A.3 of the Annual Report form requires the permittee to implement and report the frequency, extent, and amount of litter collected (estimate) during the reporting period. Report the activities performed or explain why the required elements of this section were not performed in Column F "Comments".

Although "Litter Control" is not a service provided by SIRWCD, they do remove trash, debris, tires, etc. that gets dumped into the canal system to maintain functioning of the stormwater management system. Based on solid waste pick-up truck tickets from SIRWCD's dumpster, 8,800 lbs. were collected for the report period.

- 2) Section VII, Part III.A.9.(a-c) of the Annual Report form requires the permittee to report activities performed, or provide an adequate justification for non-performance, applicable to each activity, in Column F "Comments" of the Annual Report. Complete Section VII, Part III.A.9. (a-c) of the Annual Report form.

The Annual Report has been revised in Section VII, Part III.A.9. (a-c) to include documentation titles, responsible entities and a comment to explain why activities were not performed for the report period.



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

Sincerely,

A handwritten signature in black ink that reads "Karen D. Brandon". The signature is fluid and cursive, with the first name "Karen" and last name "Brandon" clearly legible.

Karen D. Brandon, P.E.

KDB/dw

Encl.

cc: Mike Dillon
Alan Wertepny

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A. Permit Citation/ SWMP Element	B. Permit Requirement/Quantifiable SWMP Activity	C. Number of Activities Performed	D. Documentation / Record	E. Entity Performing the Activity	F. Comments
	ATTACH explanation if any of the minimum inspection frequencies in Table II.A.1.a were not met Year 1 ONLY: Attach a map of all known major outfalls as per Rule 62-624.600(2)(a), F.A.C.		Outfall Map	District Engineer	Outfall map included as Attachment 1.
Part III.A.2	Areas of New Development and Significant Redevelopment				
	Report the number of new development and significant redevelopment projects reviewed by the permittee for post-development stormwater considerations.				
	Number of new development / significant redevelopment projects reviewed	0	N/A	N/A	
	Provide in the Year 2 Annual Report the summary report of the review of local codes activity. Provide in the Year 4 Annual Report the follow-up report on plan implementation of modifying codes to allow low impact design BMPs.				
	Year 2 ONLY: Attach the summary report of the review activity Year 4 ONLY: Attach the follow-up report on plan implementation		N/A	N/A	9 th year
			N/A	N/A	9 th year
Part III.A.3	Roadways				
	Annually review (and revise, as needed) and implement the permittee's written procedures for the litter control program(s) for public streets, roads, and highways, including rights-of-way, employed within the permittee's jurisdictional area and properly dispose of collected material. Implement the program on a monthly, or on an as needed, basis. Report on the litter control program, including the frequency of litter collection, an estimate of the total number of road miles cleaned or amount of area covered by the activities, and an estimate of the quantity of litter collected.				
	PERMITTEE Litter Control Program: Frequency of litter collection	Daily or as needed	Solid Waste Authority Truck Tickets	SIRWCD Maintenance	Canal Debris Cleanup
	PERMITTEE Litter Control Program: Estimated amount of area maintained (linear feet)	60 mi.	Solid Waste Authority Truck Tickets	SIRWCD Maintenance	Canal Debris Cleanup
	PERMITTEE Litter Control Program: Estimated amount of litter collected (lbs.)	8,800	Solid Waste Authority Truck Tickets	SIRWCD Maintenance	Canal Debris Cleanup
	CONTRACTOR Litter Control Program: Frequency of litter collection	0	N/A	N/A	See above program
	CONTRACTOR Litter Control Program: Estimated amount of area maintained (linear feet)	0	N/A	N/A	
	CONTRACTOR Litter Control Program: Estimated amount of litter collected	0	N/A	N/A	

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Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity			Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments	
				For violations discovered during a high risk inspection				
				Fines issued	Notices of Violation (NOVs) / warning letters / citations issued			
	Total high risk facilities	0				N/A	N/A	There are no high risk facilities within the District.
	New high risk facilities added to the inventory during the current reporting period	0				N/A	N/A	There are no high risk facilities within the District.
	Operating municipal landfills	0	N/A	N/A	N/A	N/A	N/A	None
	Hazardous waste treatment, storage, disposal and recovery (HWTSDR) facilities	0	N/A	N/A	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	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	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	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)(v)(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 District.		
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							

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	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 reviewed for stormwater, erosion, and sedimentation controls, and the number approved.				
	PERMITTEE SITES: Construction site plans reviewed	0	Construction Site Plan Review Log	District Engineer	No plans were reviewed this report period.
	PERMITTEE SITES: Construction site plans approved	0	Construction Site Plan Review Log	District Engineer	No plans were reviewed this report period.
	PRIVATE SITES: Construction site plans reviewed	0	Construction Site Plan Review Log	District Engineer	No plans were reviewed this report period.
	PRIVATE SITES: Construction site plans approved	0	Construction Site Plan Review Log	District Engineer	No plans were reviewed this 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	District Engineer	There were no new dev/re-dev permit applicants during report period.
	Confirmed ERP coverage	0	New Development/ Redevelopment Permit Notification Log	District Engineer	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	District Engineer	There were no new dev/re-dev permit applicants during report period.
	Confirmed CGP coverage	0	New Development/ Redevelopment Permit Notification Log	District Engineer	There were no new dev/re-dev permit applicants during report period.
Part III.A.9.b	Construction Site Runoff — Inspection and Enforcement				

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Part III.A.9.b	Construction Site Runoff — Inspection and Enforcement				period.
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 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		0	Construction Site Runoff Inspection & Enforcement Log	SIRWCD Staff	No active construction sites during report period.
PERMITTEE SITES: Inspections of active construction sites for proper stormwater, erosion and sedimentation BMPs		0	Construction Site Runoff Inspection & Enforcement Log	SIRWCD Staff	No active construction sites during report period.
PERMITTEE SITES: Percentage of active construction sites inspected		0	Construction Site Runoff Inspection & Enforcement Log	SIRWCD Staff	No active construction sites during report period.
PRIVATE SITES: Active construction sites		0	Construction Site Runoff Inspection & Enforcement Log	SIRWCD Staff	No active construction sites during report period.
PRIVATE SITES: Inspections of active construction sites for proper stormwater, erosion and sedimentation BMPs		0	Construction Site Runoff Inspection & Enforcement Log	SIRWCD Staff	No active construction sites during report period.
PRIVATE SITES: Percentage of active construction sites inspected		0	Construction Site Runoff Inspection & Enforcement Log	SIRWCD Staff	No active construction sites during report period.
Notices of Violation (NOVs) / warning letters / citations issued		0	N/A	N/A	SIRWCD does not have legal authority to issue NOV's, Stop Work Orders, Fines, etc.
Stop Work Orders issued		0	N/A	N/A	SIRWCD does

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	Fines issued				not have legal authority to issue NOV's, Stop Work Orders, Fines, etc.
		0	N/A	N/A	SIRWCD does not have legal authority to issue NOV's, Stop Work Orders, Fines, etc.
		Year 1 ONLY: Attach the written construction site inspection program plan		Construction Site Inspection Plan & Inspection Form	SIRWCD Staff
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 or construction of stormwater management, erosion, and sedimentation controls. All inspectors of construction sites shall be certified through the Florida Stormwater, Erosion, and Sedimentation Control Inspector Training program, or an equivalent program approved by the Department. Follow-up training shall be provided annually. Report the number and type of training activities, the number of inspectors, site plan reviewers and site operators trained (both in-house and outside training), and the number of private persons trained by the permittee.				
	Permittee construction site inspectors				
	Permittee construction site plan reviewers				
	Permittee construction site operators				
	Private persons				