

Proactive Inspection Program

1. Procedure and Criteria for identifying priority areas/facilities

For consistency with the Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) permit, the following areas are considered a priority in the inspection program:

- Industrial, commercial, or mixed use areas
- Areas with history of past illicit discharges and/or illegal dumping
- Areas with on-site sewage disposal systems
- Areas upstream of sensitive or impaired water bodies

The attached map depicts the areas zoned as industrial or commercial, that lie within our MS4 contributing area or in an area that discharges from an outfall for which we are responsible.

The map is updated each year, typically in the month of July, by the Stormwater department and saved as a PDF format file for use by all.

2. List of identified priority areas/facilities

Each year, a list of addresses is created from an overlay of the map above and the County's current parcel map and associated database. This list is cross-referenced with the Florida Department of Environmental Protection (FDEP) list of facilities that have a Multi-Sector Generic Permit (MSGP). If any facilities that appear to require an MSGP are not on the FDEP list, the names and addresses of those businesses are referred to FDEP. The annual creation of the list of addresses and cross-referencing with the FDEP MSGP database is done by the Stormwater department, typically in the month of July of each year.

3. Annual schedule for inspections

All priority areas/facilities are inspected at least once within the current five-year permit term. The inspection area has been divided into five zones. One zone will be inspected during each year of the permit term. If an area is found to have illicit discharges/connections/dumping, it is re-inspected for compliance and if warranted, specific facilities within that area are considered for placement on the high risk facility list for more frequent inspection.

In addition, inspections for signs of illicit discharges are part of the Standard Operating Procedure for all structural control inspections and maintenance. A "checkbox" for this activity is included on the inspection forms for those activities. If a suspected illicit is identified, it is reported to the Stormwater Manager for investigation under the Reactive Investigations program.

Finally, all appropriate field personnel receive illicit discharge and illegal dumping identification and notification training. If a suspected illicit is identified during the course of performing their regular activities, it is reported to the Stormwater Manager for investigation under the Reactive Investigations program.

The field inspections are the primary responsibility of Engineering Inspectors. The pro-active inspections that take place during the inspection of structural controls and other MS4 components, is the responsibility of Engineering Inspectors. Inspections are carried out throughout the year.

4. Procedure for conducting inspections

The inspector(s) patrols the prioritized area searching for indications of illicit discharges/connections/dumping into the City's MS4, in accordance with the training received. If any are identified, the inspector makes a cursory attempt at identifying the source of the illicit. If the source is identified, the inspector makes the decision to either approach the facility owner or refer the finding to his supervisor for further action. In speaking with the facility owner or operator, the inspector advises of the findings and cites the ordinance which prohibits such discharges (Article IX, Sec. 17-255, City Code of Ordinances). The inspector uses photo documentation to support the inspection. The inspector indicates his/her intention to return to verify that the problem has been corrected.

If no source is identified, the findings are reported to the inspector's supervisor for further investigation.

The pro-active inspections that take place during the inspection of structural controls and other MS4 components, is the responsibility of Engineering Inspectors. Inspections are carried out throughout the year.

Table of inspector/zones etc...

5. Procedure for tracing source of discovered illicit discharge

Visual observation, investigation, and testing if necessary, are used to identify the source of an illicit discharges/connections/dumping.

6. Procedure for eliminating the discharge

If an illicit connection to the MS4 through a pipe is identified, it is immediately terminated (plugged or removed). If the illicit is traced back to a property owner/operator, the owner of the property is contacted by Code Enforcement. The owner is notified of the problem and asked to address the situation immediately. The owner is also notified of the re-inspection date, typically one week.

7. Procedure for documenting the inspections and enforcement activities

The attached inspection form is used for pro-active inspections and the subsequent follow-up. Photo documentation will also be provided, as needed. Selected activity related to the pro-active inspection program is logged into a database for management. The electronic files facilitate follow-up, referrals and year-end summarizing.

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

For cases within Boca Raton's MS4 contributing area, an unresolved matter is handled by the code compliance division. Code compliance assigns a case number and follows through to resolution. For cases outside Boca Raton's MS4, the appropriate entity is notified (FDOT, Palm Beach County, etc.) by the Stormwater Manager.

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

Inspection activities are carried out by two inspectors and one senior inspector. Follow-up and management are provided by the Stormwater Manager. Documentation is handled by the Records Manager/Data Analyst. Code officers are called in as needed.

10. Description of resources allocated to implement this permit element

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



City of Boca Raton
Proactive Illicit Discharge/Illegal Connection Inspection Form
(Use as many sheets as necessary)

Date of Inspection: _____ Inspector Name: _____

☐ New Inspection ☐ Follow-up Inspection

Description of inspection area: _____

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

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 correction: _____