



Proactive Inspection Program

- According to the MS4 NPDES permit, priority areas for inspection should include:
 - Areas with older infrastructure
 - 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
- A list of the priority proactive inspection area/facilities follows. Priority facilities are checked against the list of facility types associated with the FDEP MSGP (multi-sector general permit) Sectors to determine their need to be covered by a MSGP.
- All areas/facilities will be inspected at least once within the current permit term. If a facility or area is discovered to have illicit discharges/connections/dumping, it will be placed on the schedule for re-inspection the following year. Facilities are inspected unannounced between June of the current year and May of the next year.
- Procedure for conducting site inspections (include checking for MSGP)
Priority Facility inspections: For proactive facility inspections, the inspector conducts an unannounced visit to the facility. A standardized inspection form is used (see attached).

Priority Area inspections: For general areas that have been designated to have a reasonable potential of containing illicit discharges/connections/dumping, a drive-around procedure is followed. The inspector patrols the prioritized area searching for indications of illicit discharges/connections/dumping. If any are identified, the inspector either stops to do a Facility Inspection, a reactive investigation, or completes a work order form for the appropriate personnel to complete the investigation.
- Once an illicit discharge is found:
 - a. Inspect land surface area.
 - b. Inspect surrounding inlets for chemical/sewage/grease indicators.
 - c. Inspect storm manholes for chemical/sewage/grease indicators that can isolate discharges to a specific pipe segment.
 - d. Follow pipe/illicit flow to source.
 - e. Document source and determine if illicit is flowing/connected to a body of water.
- Procedure for eliminating the discharge:
 - a. Determine type of spill/illicit connection.
 - b. Verbally notify property owner/manager to contain contaminant.
 - c. Notify State Warning Point if applicable.
 - d. Determine what needs to be repaired and/or clean up required and notify property owner/manager.
 - e. Schedule follow up and document.
 - f. If following up inspection shows non-compliance, provide written warning to property owner/manager.

g. If applicable, mark property for escalated frequency of inspections.

- All inspections and follow up inspections will be documented and placed within the facility's City file.
- Any facility found not to be in compliance will be notified verbally. If non-compliance continues, further escalating notification will be put in place until compliance is followed.
- Environmental Services IPP Inspectors will conduct inspections, and IPP Inspectors and Community Improvement Code Enforcement Inspectors are responsible for enforcement of City codes.
- Stormwater inspections are combined with pretreatment inspections. The IPP Inspectors are highly trained at detecting illicit discharges, and potential discharges, not only for sewer pretreatment, but also for stormwater. The IPP Inspector(s) must be certified as a Stormwater Erosion and Sediment Control Inspector and receive regular, updated illicit discharges and spill detection, prevention and elimination training.



Illicit Discharge/Illegal Connection Inspection Form

Date of Inspection: _____

Inspector: _____

Address of Facility OR General Description of Area Inspected: _____

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

If Facility inspection, 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: _____