Attachment 4

NPDES

Introduction

The Federal Clean Water Act of 1972 authorized the National Pollutant Discharge Elimination System (NPDES) program to protect the rivers lakes and coastal waters of the United States. The Florida Department of Environmental Protection (DEP) administers the NPDES program in the state of Florida.

The City of Greenacres is a co-permittee on the Palm Beach County Third Term MS4 (Municipal Separate Storm Sewer System), NPDES Permit No FLS000018-003. Northern Palm Beach County Improvement District (NPBCID) acts as lead permittee for the Palm Beach County group. A Steering Committee was formed in 1991 to coordinate and facilitate joint activities within the Palm Beach County MS4 NPDES program. Mock•Roos, Inc. acts as staff to the Steering Committee, assisting with the administration of the program.

The MS4 permit has many required activities and an annual report is required to be submitted that documents these activities.The Public Works Department is the lead department for NPDES reporting and activities for the city of Greenacres.

The report will cover NPDES activities during the fiscal year. Year one of the report will cover from March 2, 2011 to September 30, 2011.

The Building Department is responsible for developing and enforcing a construction site runoff program and shares responsibility for illicit discharges, hazardous spills, public outreach, and fertilizer/pesticide application.

Construction Site Runoff

General

The PBC MS4 NPDES permit includes requirements related to preventing and/or reducing pollutants in stormwater runoff from construction sites. Effective May 1 2003, construction sites that will result in a disturbance of one acre or more, are required to seek coverage under the FDEP Generic Permit for Stormwater Discharge from Large and Small Construction Activities (CGP).

It is the CGP that includes the requirement that a Notice of Intent (NOI) and Notice of Termination (NOT) be submitted to FDEP. It is also the CGP that requires completion of a stormwater pollution prevention plan (SWPPP).

The PBC MS4 NPDES permit requirements related to construction site runoff include:

- Ordinances/codes requiring construction site planning approval and the use of structural and non-structural controls to prevent pollutants in construction site runoff
- A FDEP permit before land clearing, if one is required
- On-going evaluation of innovative structural and non-structural BMPs and new technologies

- Site inspections of construction projects to ensure compliance with co-permittee's development requirements and to verify that the SWPPP is on site if one is required
- An inspection log of all inspections conducted
- Use of a formalized inspection checklist for construction site inspections
- Annual training of all inspectors on proper building and construction stormwater management and erosion and sediment control BMPs AND on protocol for compliance
- Enforcement using notices of violation and/or stop work orders for those construction site operators which repeatedly fail to comply with approved erosion and sediment control BMPs
- Annual stormwater erosion and sediment control training program for construction site operators, engineers, and inspectors.
- Notification of building permit applicants of their responsibilities under the FDEP Generic Permit for Stormwater Discharge from Large and Small Construction

Ordinances
Greenacres City Code Chapter 7, Article IV contain the relevant city ordinance relating to stormwater.

Developer Notification
Projects requiring the use of a Generic Permit will be notified of this requirement by the Planning Department during the site plan approval process. The requirement will be stated in the staff report conditions of approval and developer will be notified verbally at Land Development Staff meetings.

Permits & Plans
All sites that will disturb soil will be reviewed for Best Management Practices. Prior to issuance of a Clearing permit, sites requiring the Use of Generic permit are required to submit two copies of the Pollution Prevention Plans and a copy of the Generic Permit information as approved by the State of Florida.

Permit Techs will process an SW type permit in the AS400 Permit Module. This permit will be issued to the Generic Permit responsible party. Codes for the permit are; SW0 Permit Issued, SW1 Notice of Intent received, SW2 PPP site inspection, and SW9 Final Notice of Termination received. Permit tech will automatically an initial SW2 inspection for the next business day after permit issuance.

Hard copies of permits and plans for all active jobsites will be kept in file cabinet drawer 11b in the Building Department. Permits and plans will be scanned into Laserfiche after the Certificate of Occupancy is issued and a Notice of Termination is received.

Site Inspection

Pre-Con Meeting
Prior to the start of construction, the contractor and/or the Generic Permit responsible party will have a pre-construction meeting at the site to verify all features of the plan are in place and to review required paperwork, inspections and department procedures.

First Inspection:

1. The inspector shall familiarize himself/herself with the Erosion and Sediment Control Plans and identify all BMPs prior to the initial site inspection.
2. At the time of inspection, the inspector shall meet the responsible party and review the plans on site. Items to "look for" in the initial meeting include:

    - City of Greenacres Storm-water (SW) Permit is displayed on site.
    - State of Florida Notice of Intent to Use Generic Permit (NOI) is posted on site.
    - Weekly maintenance reports filled out and available.
    - Copy of approved, stamped Erosion and Sediment Control Plans is maintained on site.

3. During the site inspection, ensure that all structural site erosion controls (BMPs) have been installed according to the approved plans.
4. All aspects of the inspection shall be documented using the inspection checklist and photos shall be taken of current site conditions.

Routine Inspection/Timing and Frequency of Inspections:

1. Site inspections shall be conducted on a routine basis throughout the duration of land-disturbing activity. The Building Inspector shall schedule these inspections in the AS400 Permit Module based on project phase (ie: during heavy grading activity more frequent inspections are required, once interior building activity has begun less frequent inspections are required). Wet-event inspections of construction sites shall be completed within 24-hours of appreciable rainfall event. The Plumbing Inspector shall also perform cursory SW inspections while at the site for any other underground plumbing inspection.
2. All information associated with site inspections shall be documented. Each inspection shall be recorded using the checklist form below. Items associated with the inspection shall be noted on the form. Copies of the checklist shall be left with the contractor or site attendant. Photos of the site shall be taken during the inspection. If there is nobody on site, the checklist should be left with the permit or sent by fax or by mail to the contractor's office.

Final Inspection:

1. The inspector shall conduct final inspection to confirm that the site, including the detention pond, is stable.
2. Final inspection should include landscape inspection, in which the inspector matches tree location and variety to the approved landscape/planting plan.
3. Detention pond should be measured to insure compliance with the approved plans (ie: size, shape, design). Emergency spillway should be installed per approved plan. Emergency spillway should consist of either a concrete flume or TRM-450 geotextile.
4. Geotextile material should be properly installed in drainage swales or emergency spillway per manufacturer's specifications.
5. Stormwater infrastructure should be inspected to insure that pipes are the size specified by the approved plans, all pipes and structures should be sealed and clear of sediment deposition.

6. Oil Skimmer baffles should be bolted and sealed.
7. Verify that site conditions (especially structures) match approved plans; revisions required either as-built or revised plans. All revisions shall be approved by the Plan Reviewer staff.
8. Obtain a copy of the Notice of Termination (NOT).

Method of Documentation

1. Upon returning to the office, site inspections shall be recorded in New World Systems (NWS) Permit Module database.
2. Photos shall be filed with the permit to be scanned into Laserfiche after final inspections.
3. The inspection checklists shall be filed with the permit to be scanned into Laserfiche after final inspections.

Compliance & Enforcement (Reporting of Violations)

1. Violations discovered during site inspections shall be duly noted. Application of levels of enforcement are as follows:
   First Offense: Written Correction Notice
   Second Offense: Written Correction Notice and $40 re-inspection fee.
   Third Offense: Written Correction Notice, $40 re-inspection fee.
   Fourth Offense: Written Correction Notice, $100 re-inspection fee, Stop Work Order issued until violation corrected. Possible issuance of Civil Penalty and/or start of code enforcement procedures per City Codes Sec 2-72 and 2-72.1.
2. Documentation is critical to effective enforcement. Advanced enforcement shall be documented for tracking purposes in an electronic database located in the Energov Code Enforcement Module.
3. It is the responsibility of the inspector to maintain time limits, specified by enforcement levels, and re-inspect on appropriate dates. Timely follow-up inspection is critical.

Permit Closure

Once final site inspection is completed, site matches approved plans or as-built have been approved for field changes, and a final Notice of Termination is received the Land Clearing Permit and SW Permit may be closed and the file scanned into Laserfiche.

Date: _____ Time: _____

Site: _____ Permit No.: _____

Inspector's Name: _____ Site Operator's Name: _____

Pollution Prevention Plan:

- ☐ The plan is on site
- ☐ Required revisions attached to plan
- ☐ Inspection reports attached to plan

Discharge Locations:

- ☐ Outlet free of obstructions
- ☐ Absence of sediment build-up
- ☐ Absence of undermining of structure
- ☐ Sediments are being maintained on site
- ☐ Erosion controls installed properly
- ☐ Turbidity level acceptable
- ☐ Turbidity barrier functioning

Comments:

Disturbed Areas (stabilization measures):

Grading	☐	Graded areas free of debris (rocks, roots, trash, etc.)
	☐	Rough grading temporarily seeded/Final grading seeded or sodded
Hay Bales	☐	installed per design & specifications
	☐	free of accumulated sediments
	☐	trenched in, back filled and compacted
	☐	replaced where rotten or saturated
	☐	installed without gaps between bales
Silt Fence	☐	installed per design & specifications (fabric, wire, stakes, spacing, etc.)
	☐	bottom trenched in a minimum of 4 inches
	☐	free of splicing between sections
	☐	secured adequately (cannot be pulled out with one hand)
	☐	free of accumulated sediments
	☐	fabric and stakes in good condition
Swales	☐	stabilized
	☐	free of sediment or debris
	☐	free of ponding
	☐	constructed at design elevation

Vehicle Ingress/Egress Locations:

- ☐ Built per design, specifications and stabilized
- ☐ Maintenance is being performed (raking, adding more stone, etc.)
- ☐ Use of wash rack and proper discharge of wash water
- ☐ Affected street(s) swept to remove excess stones and sediments

Comments:

Materials Storage Areas:

- [ ] Debris and stock piles maintained properly
- [ ] Materials stored properly
- [ ] No evidence of spills
- [ ] Secondary containment of on-site fueling tanks
- [ ] Spill response equipment and materials on site

Structural Control Devices:

- [ ] Sediment traps used and installed properly
- [ ] Stormwater Basins constructed to proper elevation and side slopes
- [ ] Flooding absent around or within inlet
- [ ] Inlet free of erosion
- [ ] Inlet free of debris and/or sediment
- [ ] Inlet at design elevation
- [ ] All hardware and equipment installed per design
- [ ] Perimeter berm at design elevation
- [ ] Perimeter berm compacted and stabilized

Other:

- [ ] Dewatering operation per plan and discharge free of turbidity
- [ ] Sanitary facilities maintained properly
- [ ] Original permitted plans implemented without major change(s)
- [ ] Offsite area(s) free of impact(s) due to construction
- [ ] Litter control

Comments:

Additional Comments:

Enforcement Action:

Inspector's Signature: _____ Date: _____