

Proactive Inspection Program

Section III.A.7.c – Illicit Discharges and Improper Disposal – Inspection and Investigation of Suspected Illicit Discharges and/or Improper Disposal

This permit element requires a written **proactive inspection program** for identifying and eliminating sources of illicit discharges, illicit connection or illegal dumping, to your MS4.

- You must inspect portions of your MS4 that have a reasonable potential of containing illicit discharges/connections/dumping. The FDEP has indicated that this should be considered to be the commercial and industrial zoned areas/properties within your MS4 contributing area.
- FDEP allows these inspections to be combined with other inspection programs, but the inspections must include specific inspection for potential stormwater contamination.

Proactive Inspections Written Program Components

1. Procedure and Criteria for identifying priority areas/facilities
2. List of identified priority areas/facilities
3. Annual schedule for inspections
4. Procedure for conducting site inspections (include checking for MSGP)
5. Procedure for tracing source of discovered or suspected illicit discharge
6. Procedure for eliminating the discharge
7. Procedure for documenting the inspections and enforcement activities
(See form)
8. Procedures for enforcement actions (or referrals to appropriate jurisdictional authority)
9. Identification of staff /department/outside entity responsible for inspections and for enforcement
10. Description of resources allocated to implement this permit element

Proactive Inspection Program (Written Procedures)

1. Procedure and Criteria for identifying priority areas/facilities

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

The attached map depicts the extent of our MS4 contributing area; areas zoned as industrial, commercial or mixed use; areas with on-site septic systems; and, currently identified impaired water body segments. Facilities that have been identified as the source of illicit discharges in the past are also noted on the map. "Older infrastructure" is not indicative of an increased potential to contain incidences of illicit discharges/connections/dumping.

2. List of identified priority areas/facilities

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 Sectors (see attached list) to determine their need to be covered by a MSGP.

3. Annual schedule for inspections

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. The schedule for inspecting the priority areas/facilities is twice per year.

4. Procedure for conducting site inspections (include checking for MSGP)

Priority Facility inspections: For proactive facility inspections, the trained 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 trained inspector(s) 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.

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 discharge/connection/dumping

6. Procedure for eliminating the discharge

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

7. Procedure for documenting the inspections and enforcement activities

(See Inspection Form)

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

For cases within Town of Highland Beach'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 Town of Highland Beach's MS4, the appropriate entity is notified (FDOT, Palm Beach County or City of Delray).

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

Inspection activities are carried out by two inspectors. Management and documentation is provided by the Public Works Department. Code officers are called in as needed.

10. Description of resources allocated to implement this permit element

Approximately \$10,476.00 has been allocated for this program for the 2011/2012 fiscal period.

Proactive Illicit Discharge/Illegal Connection Inspection Form

Date of Inspection: _____ Inspector Name: _____

Address of Facility or Description of Area Inspected: _____

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 elimination: _____