

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 (or, An attached map) 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 once every three years.

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

The inspector will try to determine the source and nature of the contamination and stop it immediately (if possible). If the source can not be determined, the owner will have the

responsibility to hire a professional to investigate, locate and terminate the discharge, dumping or connection.

6. Procedure for eliminating the discharge

The inspector will notify the owner or the person responsible to stop the illicit discharge, dumping or connection. A follow up inspection will be schedule to verify that the source has been eliminated and properly disposed. If the contamination is not within the District jurisdiction, the property entity will be notified.

7. Procedure for documenting the inspections and enforcement activities

(See Inspection Form)

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

Violation notice will be issue to the responsible party and a follow up inspection will be schedule.

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

Maintenance and Operation Department

Owner

District Engineer

10. Description of resources allocated to implement this permit element

The District has used \$1,010,500.00 during 2010-2011 fiscal year to implement the NPDES program.

Proactive Illicit Discharge/Illegal Connection Inspection Form

Date of Inspection: _____

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: _____