

Attachment 3

Town of Lake Park, Florida

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; as well as sites that are listed by the EPA as generators, transporters, treaters, storers, and disposers of hazardous waste. A Facility Detail Report is attached to the map. Facilities that have been identified as the source of illicit discharges in the past should be noted on the map.

2. List of identified priority areas/facilities

The priority area is the commercial/industrial area east of Old Dixie Highway north of Watertower Road. Facilities within the priority area are checked against the list of facility types associated with the FDEP MSGP Sectors to determine their need to be covered by a MSGP. The other areas on the attached map should also be inspected during the current permit term.

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. Initial inspections are to coincide with inspection and cleaning of drainage system and street sweeping operations.

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

During the inspection and cleaning of drainage systems and during street sweeping operations the inspector should inspect the inlets and surrounding areas for signs of

illicit discharges/connections/dumping. If any are identified, the inspector makes a notation on the Inspection Form and forwards the form to his supervisor or other appropriate personnel to complete the investigation.

5. Procedure for tracing source of discovered illicit discharge

If an illicit discharge is suspected, the appropriate personnel are to complete an on-site investigation to determine source of illicit discharge. This investigation should cover not only the subject site but other adjacent areas as well.

6. Procedure for eliminating the discharge

Town staff is to work with site operator/owners to determine best course of action to eliminate discharge.

7. Procedure for documenting the inspections and enforcement activities

(See Inspection Form)

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

Per Town Ordinances

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

Stormwater Division of Public Works & Code Compliance

10. Description of resources allocated to implement this permit element

Public Works staff is to perform initial assessment of site and report suspected illicit discharges to their supervisor for further action.

Town of Lake Park, Florida

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: _____