

Proactive Inspection Program SOP

1. Procedure and Criteria for identifying priority areas/facilities

In accordance with 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

2. List of identified priority areas/facilities

A list of the priority proactive inspection area/facilities for annual inspections are as follows;

- Gardens Avenue Commercial/Industrial Park
- Dyer Blvd. Industrial Area
- Church St. & Old Okeechobee Industrial Area
- PBC Fairgrounds Industrial Area
- Boca Rio Road Commercial/Industrial Area

Priority facilities are checked against the list of facility types associated with the FDEP MSGP Sectors to determine their need to be covered by a MSGP. PBC ERM staff shall research the DEP NPDES databases and alert DEP NPDES staff of facilities that do not appear to be covered under the MSGPs.

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:

4. Procedure for conducting site inspections

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 tracing from culvert to inlet to inlet (or manhole) to the source is utilized. In certain cases, tracing dye can confirm the route of the illicit discharge to the MS4 or receiving water body. If applicable, the illicit connection is identified. The nature or composition of the illicit discharge is confirmed.

6. Procedure for eliminating the discharge

Immediately inform the facility manager/site operator of the illicit discharge and request immediate cessation of the discharge. The mandated prohibition of illicit discharges and adopted legal authority is discussed with the facility manager/site operator.

7. Procedure for documenting the inspections and enforcement activities

Inspection forms and a database are used for the documentation of inspections, compliance and enforcement actions. (See Inspection Form)

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

Instances of non-compliance will be handled on a case by case nature with successively more rigorous enforcement measures depending on how egregious in nature the non-compliance or violation/violations are;

1. Notice of Non-Compliance
2. Notice of Violation

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

PBC Environmental Resource Management Department Surface Water Protection Section staff will conduct the Illicit Discharge Proactive Inspections and Compliance and Enforcement actions. (Note: PBC Engineering and Public Works staff conducting routine maintenance of structural controls has been trained on identifying illicit discharges. However, their referrals of potential illicit discharges are deemed reactive illicit discharge inspections, compliance and enforcement.)

10. Description of resources allocated to implement this permit element

ERM currently has 3 staff members trained in illicit discharge investigations.

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: _____