



City of Palm Beach Gardens

Attachment 4 Proactive Inspection Program

1. Procedure and Criteria for identifying priority areas/facilities

For consistency with the Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) permit, the following areas are considered a priority in the inspection program:

- a. Industrial, commercial, or mixed use areas
- b. Areas with history of past illicit discharges and/or illegal dumping
- c. Areas with on-site sewage disposal systems
- d. Areas upstream of sensitive or impaired water bodies
- e. Special events that will utilize temporary facilities

A map will be developed that depicts the areas zoned as industrial or commercial, that lie within our MS4 contributing area or in an area that discharges from an outfall for which the City is responsible. The map will be updated each year by all departments that participate in this program.

2. List of identified priority areas/facilities

Each year, a list of addresses is created from an overlay of the map above and the County's current parcel map and associated database. This list is cross-referenced with the Florida Department of Environmental Protection (FDEP) list of facilities that have a Multi-Sector Generic Permit (MSGP). If any facilities that appear to require an MSGP are not on the FDEP list, the names and addresses of those businesses are referred to FDEP. The annual creation of the list of addresses and cross-referencing with the FDEP MSGP database is done by the Engineering department. Other areas known to have illicit discharges will be added to this map as well.

3. Annual schedule for inspections

All priority areas/facilities are inspected at least once within the current five-year permit term. The areas to be inspected will be separated by discipline and given to the corresponding departments. If an area is found to have illicit discharges/connections/dumping, it is re-inspected for compliance and if warranted, specific facilities within that area are considered for placement on the high risk facility list for more frequent inspection.

In addition, inspections for signs of illicit discharges are part of the Standard Operating Procedure for all structural control inspections, catch basins, retention and detention systems and during the special event permitting process. If a suspected illicit discharge is identified, it is reported to Code enforcement for investigation under the Reactive Investigations program.

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Finally, all appropriate office and field personnel receive illicit discharge and illegal dumping identification and notification training. If a suspected illicit discharge is identified during the course of performing their regular activities, it is reported to the code enforcement department for investigation under the Reactive Investigations program.

4. Procedure for conducting inspections

City personnel inspect the prioritized areas searching for indications of illicit discharges/connections/dumping into the City's MS4, in accordance with the training received. If any are identified, the inspector makes a cursory attempt at identifying the source of the illicit. If the source is identified, the inspector takes notes on the inspection form and photographs the discharges. All information is turned over to the code enforcement department for further processing.

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 discharges/connections/dumping.

6. Procedure for eliminating the discharge

If an illicit connection to the MS4 through a pipe is identified, it is immediately terminated, if possible. If the illicit is traced back to a property owner/operator, the owner of the property is contacted by the code enforcement department. The owner is notified of the problem and asked to address the situation immediately. A notice of violation is issued at this time.

7. Procedure for documenting the inspections and enforcement activities

The proactive inspection form is used for pro-active inspections and the subsequent follow-up. Photo documentation will also be provided, as needed. Selected activity related to the pro-active inspection program is logged into the City's code enforcement eden database for future use.

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

The City of Palm Beach Gardens uses the Code Enforcement Department to resolve cases that affect any MS4 area with our jurisdiction. This includes MS4's owned by the City of Palm Beach Gardens, Northern Palm Beach County Improvement District, FODT, Palm Beach County or privately maintained systems. Any enforcement matters are handled by the code enforcement department. Code enforcement cases are assigned a case number and shall be resolved through compliance and/or fines if necessary.

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

The City Palm Beach Gardens has multiple departments that participate in the proactive inspection program. The City uses Code Enforcement, Fire Department, Building

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Department, Parks, Public Works, and Engineering employees to implement the proactive inspection program.

10. Description of resources allocated to implement this permit element

The City Palm Beach Gardens has multiple departments that participate in the pro-active inspection program. The City uses Code Enforcement, Fire Department, Building Department, Parks, Public Works, and Engineering employees to implement the proactive inspection program.

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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: _____