

## **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:

- o Areas with older infrastructure
- o Industrial, commercial, or mixed use areas
- o Areas with history of past illicit discharges and/or illegal dumping
- o Areas with on-site sewage disposal systems
- o 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:

Yr. 1 (2010 - 2011) Lake Worth Rd. and 2<sup>nd</sup> Ave. Corridors  
(industrial/commercial);

Yr. 2 (2011 - 2012) Congress Ave. Corridor from 2<sup>nd</sup> Ave. to L-8 Canal  
(industrial/ commercial);

Yr. 3 (2012 - 2013) Congress Ave. Corridor from L-8 Canal to Summit Blvd.;  
Forest Hill Blvd. east of Congress; & Forest Hill Blvd. from Congress to Tucker  
Rd. (industrial/commercial);

Yr. 4 (2013 - 2014) Forest Hill Blvd. from Tucker Rd. to Military Trail; east side  
of Military Trail from north of Forest Hill Blvd. to Kent Ave. (industrial/  
commercial);

Yr. 5 (2014 - 2015) areas w/ older infrastructure; history of past illicit discharges and/or illegal dumping; areas with on-site sewage disposal systems.

**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**

If an illicit discharge is suspected or observed, the type/nature of the discharge is determined and traced back to its likely source. Once the source is found, verification of whether an illegal discharge is occurring is determined by asking witnesses, nearby personnel, manager, or visual means. If illicit discharge is occurring, appropriate personnel are notified that it must be stopped immediately.

**6. Procedure for eliminating the discharge**

The inspector who has discovered the illicit discharge will order it to be stopped immediately. Code enforcement cites the person/facility for the illegal discharge and orders discharge to be permanently stopped and appropriate corrections made. A follow-up inspection will be done within days to ensure that the discharge is no longer occurring, and that the material which was being discharged is being disposed of properly.

**7. Procedure for documenting the inspections and enforcement activities**

(See Inspection Form)

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

Code enforcement will issue a Notice of Violation citing the facility for the illegal discharge to the storm sewer system. The discharge must be stopped immediately. A follow-inspection will be done within days to ensure that the

discharge is no longer occurring, and that the material which was being discharged is being disposed of properly.

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

Utilities Staff Members

Stormwater Inspector (Bob Hennes)

Code Enforcement Officer (Nanci Cuenot)

Village Police Department

Lake Worth Drainage District

Department of Transportation

**10. Description of resources allocated to implement this permit element**

Utilities staff members (inform stormwater inspector)

Stormwater inspector

Enforcement officer

t.v. video camera, if needed

## 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: \_\_\_\_\_