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**VILLAGE OF ROYAL PALM BEACH PUBLIC WORKS OPERATING PROCEDURE**

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**DIVISION:** Field Operations – Road & Bridges

**PROCEDURE #:** SWS-003

**SUBJECT:** Illicit Discharges – Proactive Inspection Program

**DATE:** March 14, 2012

**REVISION #:**

**PREPARED BY:** Paul L. Webster, P.E., Director of Public Works

**APPROVED BY:** Paul L. Webster, P.E., Director of Public Works

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**POLICY:** The Department of Public Works (DPW) is responsible for the operation and maintenance of the Village stormwater system and for compliance with the Village Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) permit. The Village MS4 NPDES permit requires a proactive inspection program for illicit discharges. The following procedure will insure that the permit conditions are met and that illicit discharges within the system are identified.

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The Proactive Inspection Program is a joint effort between the DPW and Code Enforcement Division. The DPW will conduct and document the inspections required by our permit. However, we recognize that the Code Enforcement Division canvasses the commercial/industrial areas continually throughout the year. The code enforcement inspectors will canvass all of the commercial/industrial areas within the Village about once every two weeks. These inspectors are also tasked with enforcing all of the Village's codes including those related to illicit discharges within our storm sewer system. The prohibition against illicit discharges into the stormwater system can be found in Sec. 21.5-8 of the Village Code of Ordinances.

#### **Priority Areas/Facilities**

The priority areas for the proactive inspection are the industrial park and commercial areas that connect to our MS4. The areas are shown on the attached map. (Map not included) If a water body within the Village MS4 area should become impaired, the stormwater contributing area upstream will be added to the priority area map. If a facility is identified as the source of an illicit discharge, it will be added to the map and will be scheduled for inspection annually.

#### **Inspection Schedule**

All commercial, industrial, or mixed use areas will be inspected by DPW at a minimum of once during the current permit term. The Code Enforcement Division will canvas these areas approximately 26 times per year. 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.

## **PROCEDURE:**

### **Priority Facility Inspections:**

The Field Operations Superintendent or other trained inspector will prepare for the inspection by reviewing the stormwater system in GIS for the facility to be inspected. The Field Operations Superintendent or other trained inspector will conduct an unannounced visit to the facility and document the visit with the attached inspection form.

The inspector will inspect the drainage system in the area for the facility being inspected for signs of an illicit discharge. The inspector will look for oil sheens, odd color, foam, odors, or other indications of an illicit discharge and will note their findings on the inspection form.

If there are any indications of an illicit discharge the inspector will check each basin or manhole upstream of the point the suspected discharge is located until they find a basin or manhole that does not show any indication of an illicit discharge. The DPW inspector will then call a code enforcement to continue the investigation.

Once the code enforcement inspector is on-site, they can work with the facility to determine the source of the discharge and eliminate it. The DPW inspector will remain onsite for the remainder of the inspection if requested to do so by the code enforcement inspector. The code enforcement inspector will document the remainder of the inspection for potential code enforcement activities. It will be the sole responsibility of the Code Enforcement Division to enforce Village code.

The DPW inspector or the code enforcement inspector will contact the Director of Public Works and/or the Community Development Director prior to referring a suspected illicit discharge to the Palm Beach County Sheriffs' Office – District 9.

The DPW inspector will speak with representatives of the facility to determine their SIC code and whether they have a MSGP. These will be noted on the inspection form.

### **Priority Area Inspections:**

The Field Operations Superintendent or other trained inspector will prepare for the inspection by reviewing the stormwater system in GIS for the area to be inspected. The Field Operations Superintendent or other trained inspector will conduct a drive-around of the 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. The procedures outlined above for the facility inspections will be followed if there are any indications of illicit discharges/connections/dumping.

**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: \_\_\_\_\_