

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

Wellington already has identified priority areas/ facilities based upon risk for potential contamination and historical knowledge of illicit discharges and/or improper disposal. A complete list is provided below. General areas of concern are shown on the attached map.

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.

- 1) Areas with Older Infrastructure:
 - a. North/East of Forest Hill Blvd. between Birkdale and Wellington Trace (North)
- 2) Light Industrial, Commercial, or mixed Uses:
 - a. Wellington Commerce/Business Park – Pierson Road
 - b. Wellington Mall (Old)
 - c. Wellington Green Mall
 - d. Marketplace Shopping Center
 - e. Courtyard Shops Shopping Center
 - f. Town Center Area
 - g. Wellington Regional Medical Center
 - h. SR7 Commercial Corridor
 - i. Palm Beach International Equestrian Center
 - j. Equestrian Village
 - k. Nurseries
 - l. Equestrian Preserve Area
 - m. Wastewater Treatment Plant
 - n. Water Treatment Plant

- o. Public Works Facility
 - p. Parks and Recreation Maintenance
 - q. Golf Courses
- 3) Areas with History of Past Illicit Discharges and/or Illegal Dumping:
 - a. Shopping Centers
 - b. Equestrian Preserve Area
 - c. Wellington Commerce Park
- 4) Areas with On-Site Sewage Disposal Systems
 - a. Rustic Ranches
 - b. Little Ranches
 - c. Paddock Park
 - d. Saddle Trail
 - e. Equestrian Preserve Area
- 5) Areas Upstream of Sensitive or Impaired Water Bodies
 - a. None

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 monitored until compliance is achieved and then placed on the schedule for re-inspection the following year. In many instances where illicit activities are detected, these areas will be monitored more frequently. The schedule for inspecting the priority areas/facilities is:

All light industrial/commercial areas (Past/Historical Areas included in this subset) are inspected at least annually by Utility personnel as part of Wellington's Grease Trap inspection program.

All areas with older infrastructure are inspected annually by Utility personnel and Engineering personnel.

All areas with On-Site Sewage Disposal Systems are inspected annually by Code Enforcement personnel as part of Wellington's BMP program.

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

Tracing the source of illicit discharges is achieved by a variety of techniques, including visual observation, odor detection, chemical testing and analytic and video equipment.

6. Procedure for eliminating the discharge

The procedures for eliminating illicit discharges are as follows:

- 1) Illicit Dumping/Discharges – Source of dumping is identified (directly or through investigation & monitoring) and the offender is cited and directed to cease illegal dumping. Continue to monitor for issues.
- 2) Illicit Connection to Pipe - Offender is notified and cited. Connection immediately is plugged or removed. Continue to monitor for issues.

7. Procedure for documenting the inspections and enforcement activities

Inspections documenting procedures include: 1) Completion of the attached inspection form; 2) Photographs as needed; 3) Entering inspection data/photos into a master database for monitoring/ management/ reporting.

Enforcement documenting procedures include: 1) Completion of Notice of Violation form; 2) Correspondence (letters and other Notices); 3) Photos; 4) Entering data into master data base for reporting/monitoring/management; 5) Entering location on map.

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

Initial enforcement/compliance is assigned to the NPDES Inspector. If compliance is not achieved, cases within the jurisdiction of the Village of Wellington are given to Wellington's Code Enforcement Division. Enforcement is conducted pursuant to existing procedures. For cases outside Wellington's MS4, the appropriate entity is notified.

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

The parties responsible for inspections and enforcement are:

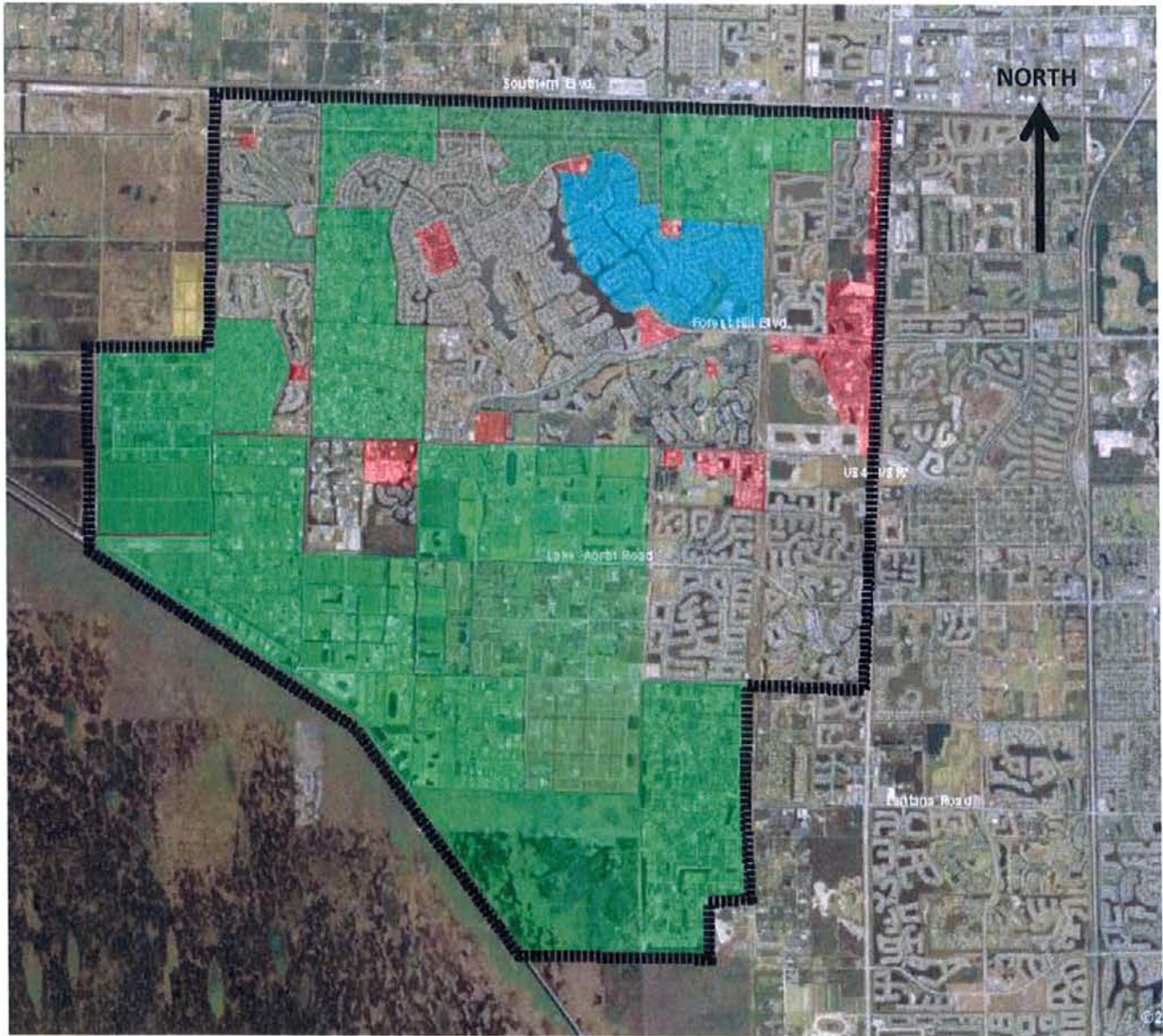
- 1) Inspections
 - a. Engineering and Construction Services – Construction Manager
 - b. Utilities – Construction Coordinator
 - c. Public Works – Stormwater Manager
- 2) Enforcement
 - a. Initial enforcement handled by Inspectors (above)
 - b. Protracted enforcement conducted by Code Enforcement Officers

10. Description of resources allocated to implement this permit element

Each department responsible for the inspection and enforcement of illicit discharges and improper disposal has the necessary tools, including funding, vehicles, computers, equipment, inspection forms and training to implement the program.

VILLAGE OF WELLINGTON MS4 MAP

PRIORITY AREAS/FACILITIES



LEGEND

Older Infrastructure



Commercial/Light Industrial/Mixed



On-Site Sewage Disposal



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: _____