

City of Atlantis

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.

- We must inspect portions of our 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. *Note there are no commercial or industrial areas in Atlantis' MS4.*
- 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:

- Areas with older infrastructure – *All City areas per the NPDES Tracking Sheet.*
- Industrial, commercial, or mixed use areas – *None.*
- Areas with history of past illicit discharges and/or illegal dumping – *None.*
- Areas with on-site sewage disposal systems – *None.*
- Areas upstream of sensitive or impaired water bodies – *Yes: C-16 Basin.*

The attached NPDES Contributing Areas map depicts the extent of our MS4 contributing area. No facilities have been identified as the source of illicit discharges in the past but will be noted on the map if found in the future. “Older infrastructure” is not indicative of an increased potential to contain incidences of illicit discharges/connections/dumping.

2. List of identified priority areas/facilities (include checking for MSGP)

As there are **currently** no priority areas, there are no priority proactive inspection sites. **Each year facilities within the City will be reviewed to determine the need for 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 NPDES Tracking Sheet for scheduled inspections.

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

This will be determined as appropriate for the problem.

6. Procedure for eliminating the discharge

This will be determined as appropriate for the problem.

7. Procedure for documenting the inspections and enforcement activities

(See Inspection Form)

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

This will be determined as appropriate for the problem.

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

Typically the Utilities/Public Works Director, the Code Enforcement Officer, or Police Department according to the issue.

10. Description of resources allocated to implement this permit element

As needed by City staff of the Utilities/Public Works Department, Code Enforcement Officer, or Police Department.

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___ Unknown___

If yes, does this facility have one? Yes___ No___ Unknown___

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: _____