Attachment 5

City of Boynton Beach

Proactive Inspection Program

Third Term, Year 1 Report

March 2012

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:

   - 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

   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 of the priority proactive inspection area/facilities are maintained by the Stormwater Division and Environmental Inspector.

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:

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 documenting the inspections and enforcement activities**
   Refer to the attached Proactive Illicit Discharge/Illegal Connection Inspection Form, Illicit Discharge Hotline Incident Tracking Sheet, and Wastewater Spillage Report forms.

6. **Procedures for tracing the source of the discovered illicit discharge, eliminating the discharge, and enforcement actions (or referrals to appropriate jurisdictional authority)**
   Refer to the attached City of Boynton Beach Wastewater Conveyance System Spill Response Plan. This plan will be reviewed annually and will be updated to respond to threats to illicit discharges within the MS4.

7. **Multi-Sector Generic Permit (MSGP) Confirmation**
   The MSGP coverage research and reporting is documented by the copies of the lists generated during each step (list of facilities within MS4 that are commercial/industrial, list of facilities in the City with MSGP coverage, and/or list of facilities that appear to need MSGP coverage but appear not to have it). These lists will be maintained with other back-up documentation to support the annual permit activities conducted by the City. The list of facilities that appear to need MSGP coverage will be sent to FDEP for follow-up.

   The attached inspection form is used for pro-active inspections and subsequent follow-up. Photo documentation may also be provided, as 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: _____