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Town of Glen Ridge

Fax

To: Kenneth From: Michelle Söter
Fax: _____ Pages: 10
Phone: _____ Date: 6/18/12
Re: _____ CC: _____

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● **Comments:**

Proactive Illicit Inspection Program



Department of Environmental Protection

2600 Blair Stone Road, M.S. 3570
Tallahassee, Florida 32399-2400

JUN 18 2012

June 9, 2012

Congratulations on successfully completing the Florida Stormwater Erosion and Sedimentation Control Inspector Training Program. I greatly appreciate your participation in and successful completion of this course. I hope that it has helped you to better understand Florida's stormwater problems and the importance of proper design, construction, and maintenance of erosion and sediment controls during construction, in order to assure the proper long-term operation and maintenance of stormwater systems after construction is completed.

Attached you will find your numbered certificate and wallet card. Please let me know if there are any errors in the certificate or card, or in the grading of your exam. If I can be of further assistance, please do not hesitate to contact me at 850/245-8294 or via email: halton.lunsford@dep.state.fl.us

Michelle McKensie-Suiter
Town of Glen Ridge
1501 Glen Road
Glen Ridge, FL 33406

DEPARTMENT OF
ENVIRONMENTAL PROTECTION
STORMWATER EROSION AND SEDIMENTATION CONTROL
INSPECTOR TRAINING PROGRAM

Michelle McKensie-Suiter

<i>Class Date</i>	<i>Inspector Number</i>
May 17, 2012	27119

QUALIFIED STORMWATER MANAGEMENT INSPECTOR

QUALIFIED STORMWATER MANAGEMENT INSPECTOR

The undersigned hereby acknowledges that
Michelle McKensie-Suiter

has successfully met all requirements necessary to be fully qualified through
the Florida Department of Environmental Protection Stormwater Erosion
and Sedimentation Control Inspector Training Program

Hal Lunsford

May 17, 2012
Inspector Number 27119

Kristine Jones

Site Plan Review Procedures

Site Plan Reviews are required for some projects within the Town of Glen Ridge.

Application packages for building/construction/grading permits include brochures presenting the need for obtaining an *Environmental Resource Permit* (ERP) and/or coverage under the *NPDES Generic Permit for Stormwater Discharge from Large and Small Construction Activities* (CGP).

Site Plan Reviews are typically conducted in the beginning of the process by the personnel in the Planning/Building Department. Current local criteria are used as the guideline for review of the temporary and permanent stormwater treatment practices that are being proposed by the site plan.

Applicants for a building/construction/grading permit are advised that coverage under the Construction Generic Permit may be required. Applicants are further advised that proof of a SFWMD or FDEP Permit and/or coverage under the CGP, if applicable, will be required during the first construction site inspection.

The following checklist is used when performing site plan reviews:

YES	NO	N/A
-----	----	-----

- | | | | |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Proposed work requires coverage under CGP. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Proposed work appears to require an ERP. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Proposed temporary stormwater sedimentation & erosion control BMPs appear to be appropriate for the project. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Proposed permanent stormwater BMPs meet local requirements. |

Construction Site Inspection Plan and Inspection Form

Construction site inspections are conducted for land-disturbing projects which have the potential to discharge stormwater runoff into our MS4.

Timing

Construction site inspections are conducted:

- Before the start of construction, after the placement of temporary BMPs
- During construction (one or more inspections, based on the project's potential for discharge to our MS4)
- At the end of the construction

Site Priority

All construction sites are considered priority if they have the potential to discharge into water bodies or our MS4. Sites will be inspected with a frequency deemed appropriate during the site plan review process and with consideration to rainfall events. In addition, any sites where compliance is a concern will be inspected more frequently.

Inspection Procedure

Inspections are the responsibility of The Town Manager and are conducted using the attached construction site inspection form. The intent of the inspection is to verify that BMPs are performing and to document the inspections. All completed inspection forms are kept in the Town Manager's Office.

Enforcement

Instances of non-compliance will be handled with successively more rigorous enforcement measures.

1. Notice of Violation
2. Stop work order
3. Fines

The construction site inspector will issue notices of violation or stop work orders as deemed necessary. Fines will be issued.....

Construction Site Inspection Form

Site: _____

Date of Inspection: _____

Address: _____

Lat/Long of discharge point: _____ Receiving water body: _____

Project owner: ☐ Private ☐ City of _____

YES NO N/A

- | | | | |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Erosion & Sedimentation Controls are installed as shown on plan. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Erosion is being controlled on site. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Sedimentation is being contained on site. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No indication of sedimentation leaving the site. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | SWPP & completed inspection forms are on site & available. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Copy of SFWMD or FDEP Permit (if applicable) is on-site. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Coverage under the GCP has been obtained. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Prior non-compliance issues have been addressed. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All other sources of pollution are being controlled. |

Comments:

Town of Glen Ridge

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 our MS4.

- Portions of our MS4 that have a reasonable potential of containing illicit discharges/connections/dumping are inspected annually. The FDEP has indicated that the portions of our MS4 that have a reasonable potential of containing illicit discharges/connections/dumping should be considered to be the commercially zoned areas/properties that could potentially discharge into our MS4.
- FDEP allows these inspections to be combined with other inspection programs, but the inspections must include specific inspection for potential stormwater contamination.

Proactive Inspection Program (Written Procedures)

1. Procedure and Criteria for identifying priority areas/facilities

For consistency with the Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) permit, the following areas are considered a priority in the inspection program:

- 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 areas zoned as industrial or commercial, that lie within our MS4 contributing area or in an area that discharges from an outfall for which we are responsible.

The map is updated each year, typically in the month of October, by the Town Manager and saved as a PDF format file for use by all.

2. List of identified priority areas/facilities

Each year, a list of addresses is created from an overlay of the map above and the County's current parcel map and associated database. This list is cross-referenced with the Florida Department of Environmental Protection (FDEP) list of facilities that have a Multi-Sector Generic Permit (MSGP). If any facilities that appear to require an MSGP are not on the FDEP list, the names and addresses of those businesses are referred to FDEP. The annual creation of the list of addresses and cross-referencing with the FDEP MSGP database is done by the Town Manager, typically in the month of October of each year.

3. Annual schedule for inspections

All priority areas/facilities are inspected at least once within the current five-year permit term. The inspection area has been divided into five zones. One zone will be inspected during each year of the permit term. If an area is found to have illicit discharges/connections/dumping, it is re-inspected for compliance and if warranted, specific facilities within that area are considered for placement on the high risk facility list for more frequent inspection.

In addition, inspections for signs of illicit discharges are part of the Standard Operating Procedure for all structural control inspections and maintenance. A "checkbox" for this activity is included on the inspection forms for those activities. If a suspected illicit is identified, it is reported to The Town Manager for investigation under the Reactive Investigations program.

Finally, all appropriate field personnel receive illicit discharge and illegal dumping identification and notification training. If a suspected illicit is identified during the course of performing their regular activities, it is reported to The Town Manager for investigation under the Reactive Investigations program.

The field inspections are the primary responsibility of The Town Manager. The pro-active inspections that take place during the inspection of structural controls and other MS4 components, is the responsibility of The Town Manager. Inspections are carried out throughout the year.

4. Procedure for conducting inspections

The inspector(s) patrols the prioritized area searching for indications of illicit discharges/connections/dumping into the City's MS4, in accordance with the training received. If any are identified, the inspector makes a cursory attempt at identifying the source of the illicit. If the source is identified, the inspector makes the decision to either approach the facility owner or refer the finding to his supervisor for further action. In speaking with the facility owner or operator, the inspector advises of the findings and cites the ordinance which prohibits such discharges (_____). The inspector uses photo documentation to support the inspection. The inspector indicates his/her intention to return to verify that the problem has been corrected.

If no source is identified, the findings are reported to the inspector's supervisor for further investigation.

The pro-active inspections that take place during the inspection of structural controls and other MS4 components, is the responsibility of The Town Manager. Inspections are carried out throughout the year.

Table of inspector/zones etc...

5. Procedure for tracing source of discovered illicit discharge

Visual observation, investigation, and testing if necessary, are used to identify the source of an illicit discharges/connections/dumping.

6. Procedure for eliminating the discharge

If an illicit connection to the MS4 through a pipe is identified, it is immediately terminated (plugged or removed). If the illicit is traced back to a property owner/operator, the owner of the property is contacted by The Town Manager. The owner is notified of the problem and asked to address the situation immediately. The owner is also notified of the re-inspection date, typically one week.

7. Procedure for documenting the inspections and enforcement activities

The attached inspection form is used for pro-active inspections and the subsequent follow-up. Photo documentation will also be provided, as needed. Selected activity related to the pro-active inspection program is logged into a database for management. The electronic files facilitate follow-up, referrals and year-end summarizing.

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

For cases within The Town of Glen Ridge's MS4 contributing area, an unresolved matter is handled by the code compliance division. Code compliance assigns a case number and follows through to resolution. For cases outside The Town of Glen Ridge's MS4, the appropriate entity is notified (FDOT, Palm Beach County, etc.) by The Town Manager.

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

Inspection activities are carried out by The Town Manager. Follow up's are provided by the Town Manager/Stormwater Manager. Documentation is handled by the The Town Manager. The Town Manager is also the Code officer within the Town of Glen Ridge.

10. Description of resources allocated to implement this permit element

Approximately \$5,000.00 has been allocated for this program for the 2011/2012 fiscal period. See the Stormwater Utility Budget document.

Proactive Illicit Discharge/Illegal Connection Inspection Form

(Use as many sheets as necessary)

Date of Inspection: _____ Inspector Name: _____

☐ New Inspection

☐ Follow-up Inspection

Description of inspection area: _____

Identification of MS4 component that could receive discharge from this site/area: _____

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 correction: _____