



Infrastructure · Water · Environment · Buildings

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**NPDES STORMWATER
SECTION**

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Subject:

Response to Year 1 Standard Operating Procedure Review Letter
NPDES MS4 Permit No. FLS000018-003

WATER RESOURCES

Dear Mr. Livingston,

We have received the review by the Florida Department of Environmental Protection (FDEP) of the Year 1 Standard Operating Procedures (SOPs) for the Village of Tequesta dated April 23, 2012. Attached is the revised version of the Illicit Discharge SOP outlined in Part III.A.7.c of the Palm Beach County NPDES MS4 Permit (No. FLS000018-003). A brief section has been added at the recommendation of the FDEP which describes how the Village of Tequesta will annually confirm which local facilities will be categorized as a Multi-Section Generic Permit (MSGP). This section also describes the procedure that is to be followed to properly include any new MSGP facilities on the lists maintained by both the Village of Tequesta and the FDEP.

If you have any questions or wish to discuss this matter further, please don't hesitate to contact us.

Sincerely,

ARCADIS U.S., Inc.

Samantha Ciminello, E.I.
Water Resources Engineer I

Date:

May 2, 2012

Contact:

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Our ref:

RF005106.0000

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Geology
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ARCADIS

Mr. Eric H. Livingston
May 1, 2012

Copies:

Alan Wertepny, Mock-Roos
Russell White, VOT

Enclosed:

Revised Illicit Discharge SOP for the Village of Tequesta

Proactive Inspection Program
Village of Tequesta

This permit element requires a written proactive inspection program and written procedures 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.

Written Procedures of Proactive Inspections Program for the Village of Tequesta

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

Written Procedures of Proactive Inspection Program
Village of Tequesta

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

Since there have been no illicit discharges in the Village of Tequesta, there is not a section of the permitted area that should be monitored more closely than others. All abovementioned areas shall be inspected for discharges/connections/dumping.

2. List of identified priority areas/facilities

Priority areas and facilities that are inspected for illicit discharges, connections, or dumping are all areas with older infrastructure; all industrial commercial or mixed use areas; and all areas with on-site sewage disposal systems. This list is then cross-referenced with the 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 for inclusion as an MSGP.

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. Since the Village does not yet have any areas with a history of illicit discharges, connections, or dumping, re-inspection of any area found of this illicit activity shall be increased to twice a year.

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. The standardized inspection form is used to record findings (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.

MSGP Inspections: All MSGP facilities will be inspected following the procedures for priority facility inspections. The standardized inspection form is used to record findings (see attached).

5. Procedure for tracing source of discovered illicit discharge

Parties responsible for illicit discharges shall trace the source and shall inform the Village of Tequesta of the source in order for appropriate resolutions can be recommended by the Village.

6. Procedure for eliminating the discharge

As recommended by the Village of Tequesta in Facility inspection forms.

7. Procedure for documenting the inspections and enforcement activities

Documentation of inspections and enforcement activities shall utilize "Proactive Illicit Discharge/Illegal Connection Inspection Form" (see attachment).

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

Enforcement actions shall include notification of all parties responsible for illicit activities and suggestions made by the Village of Tequesta of changes to cease and rectify noted illicit activities. Responsible parties shall be responsible for attending to these issues and provide documentation to the Village of Tequesta in a timely manner.

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

The Village of Tequesta and its staff are the only responsible party for completing illicit discharge inspections and monitoring its enforcement. No other parties are authorized to conduct such inspections.

10. Description of resources allocated to implement this permit element

All resources used to implement this permit element are to be allocated by the Village of Tequesta Public Services Manager.

Proactive Illicit Discharge/Illegal Connection Inspection Form
Village of Tequesta

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: _____