

# CITY OF DELRAY BEACH



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October 7, 2013

Ms. Michelle Fish

NPDES Stormwater Program

Florida Department of Environmental Protection

2600 Blair Stone Road

Tallahassee, Florida 32399-2400

Subject: Palm Beach County Municipal Separate Storm Sewer System (MS4)  
NPDES Permit No. FLS00018 (Cycle 3)  
Year 2 Annual Report RAI August 26, 2013 - City of Delray Beach

Dear Ms. Fish:

The City of Delray Beach has received and reviewed the Request for Additional Information (RAI) provided by the Florida Department of Environmental Protection (FDEP) pertaining to the Cycle 3 Year 2 Annual Report. The following responses have been prepared pursuant to the request for additional information.

## **Street Sweeping Program for TN and TP Reduction:**

*In the initial August 6, 2013 RAI letter the City of Delray Beach was requested to utilize the Florida Stormwater Association Load Reduction Tool for calculating the total nitrogen and total phosphorus load reductions pursuant to street sweeping efforts. Our response was as follows:*

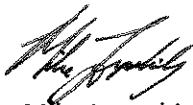
*Our records show a reported TN and TP reduction at 639.34 and 409.95 lbs respectively, as indicated in our Annual Report. Upon re-running the data and load calculations utilizing the recommended calculator we obtained a TN and TP reduction value of 632 and 405 lbs respectively which is less than a 1.5% deviation on each account. The slight difference in final load reduction calculations is most likely due to rounding of numbers during calculations.*

*In a second RAI dated August 26, 2013, the FDEP has now claimed that "TN and TP calculated with lbs reported and y3 reported do not match." The City of Delray Beach utilizes three separate street sweeping vehicles. These vehicles are numbered: 695, 696, and 697 respectively. This information is reflected in our 2011-2012 annual report summary table and has been reported this way for several years. Vehicle 695 is a compact front load sweeper that picks up larger heavier solids. Vehicles 696 and 697 are utilized to pick up finer particulate matter. From an operational perspective, Vehicle 695 is utilized in advance of vehicles 696 and 697 thus will produce higher volumes of waste matter collected and subsequently higher annual TN and TP load reduction calculations. Due to the relative small capacity of vehicle 695, it would be inefficient to continually bring the loaded vehicle to the landfill for dumping of the waste throughout any given sweeping event. The waste collected from vehicle 695 is transferred to a separate contained trailer throughout any given sweeping event wherein an estimate of cubic yards is tallied prior to disposal of the accumulated waste. As previously stated, vehicles 696 and 697 collect fine particulate matter, thus the capacities of these vehicles is sufficient to accommodate the waste load collected during any given sweeping event. Upon completion of any given sweeping event, vehicles 696 and 697 are driven directly to the landfill wherein a weight, reported in pounds, is tallied prior to disposal of the accumulated matter.*

*In the 2011-2012 annual report, the total annual cubic yards collected from vehicle 695 was converted to a cubic feet figure. The resultant number was then calculated into total pounds of waste collected by vehicle 695. The total poundage of waste collected by vehicle 695 was then added to the total pounds of waste collected by vehicles 696 and 697. The resultant figure was then run through a simple previously approved and utilized formula for calculating both TN and TP load reductions. Our records show a reported TN and TP reduction at 639.34 and 409.95 lbs respectively, as indicated in our Annual Report. Upon re-running the data and load calculations utilizing the recommended calculator we obtained a TN and TP reduction value of 632 and 405 lbs respectively which is less than a 1.5% deviation on each account. The slight difference in final load reduction calculations is most likely due to rounding of numbers during calculations.*

The City has crafted the above responses pursuant to the request for additional information with the expectation that sufficient detail was provided to satisfy the request. Should additional information be required, please contact us at your convenience to discuss any deficiencies.

Sincerely,



Mike Lopushinsky

Stormwater Administrator

City of Delray Beach

434 S. Swinton Ave.

Delray Beach, Florida 33444