



**OFFICE OF PUBLIC SERVICES DEPARTMENT**

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September 7, 2013

Mr. Allen P. Hubbard, P.E.  
Program Administrator  
NPDES Stormwater Program  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Palm Beach County NPDES Permit No. FLS00018 (Cycle 3)  
Year 2 Annual Report Comments/Responses

Dear Mr. Hubbard:

Please find attached the responses from the City of Lake Worth concerning your Year 2 Annual Report comment. FDEP requested the following additional information from the City concerning our Year 2 Annual Report.

Thank You,

A handwritten signature in blue ink, appearing to read "J. Brown".

Jamie Brown  
Public Service Director

### **Areas of New Development and Significant Redevelopment**

**Comment:** Part II.A.2 of the MS4 permit requires co-permittees to review current local codes and LDRs to reduce stormwater impacts for new and existing development.

Provide a summary that includes:

- a) a description of the current and proposed techniques aimed at reducing the stormwater impact of new development and areas of significant redevelopment that are included within the applicable codes and regulations;
- b) a description of innovative stormwater planning techniques, including those described above, recommended for possible future incorporation into the codes and regulations (beyond what may be currently in draft); and,
- c) a plan for implement changes to code and regulations.

**Response:** The City of Lake Worth is currently undertaking a complete rewrite of its Land Development Regulations. The LDR's propose to reduce impervious lot coverage to 55% for larger lots while still allowing up to 75% for the City's smallest lots. The LDR's also include a new conservation zoning district which will restrict development of submerged lands along the Lake Worth Lagoon spanning the length of the municipal golf course, larger single family tracts along the waterfront to the south, and along the waterfront directly west of the Beach Casino site.

The proposed LDR's are tentatively schedule for public hearings with the Planning & Zoning Board and the Historic Resources Preservation Board in June/July 2013 and the City Commission in July/August 2013 for adoption.

The Changes included in this packet are scheduled for approval by the City of Lake Worth Commission September 17, 2013.

See Attachment A

## **Florida-Friendly Fertilizer Ordinance**

**Comment:** Part III.A.6. of the MS4 permit requires that if a Florida-Friendly Landscaping Ordinance is not adopted, all local governments within the watershed of a nutrient-impaired water body shall adopt the Department's Model Ordinance for Florida-Friendly Fertilizer Use on Urban Landscapes or an ordinance that includes all of the requirements set forth in the Model Ordinance. The ordinance is required to be adopted within 24 months of permit issuance.

**Response:** The City of Lake Worth Florida Friendly Fertilizer Ordinance is scheduled to be adopted by the City of Lake Worth Commission on October 1, 2013. To meet all requirements set forth in the model Ordinance and (FDEP) Florida Department of Environmental Protection criteria set forth for a Watershed of a nutrient impaired water body to adopt regarding use of Fertilizer on Urban Landscapes.

See Attachment B

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

**Comment:** Part III.A.3. of the MS4 Permit requires co-permittees to use the Florida Stormwater Association (FSA) MS4 Load Reduction Tool to calculate the total nitrogen (TN) and total phosphorus (TP) load reductions of street sweeping. A permittee may also use results from a similar study if it is approved by the Department prior to doing the load calculations:

**Response:** In calculating nutrient load reductions using the FSA calculator tool. The error in total loads removed was made due to a failure to change cubic yards into cubic feet.

# Enter Volume of Solids<sup>(1)</sup> Removed - Calculate Equivalent Dry Weight

FSA 2012

Category of Maintenance Activity	For Wet or Dry Solids by Volume <sup>(2)</sup>			Calculated Equivalent Dry Weight Collected (Kilograms)
	Enter Volume of Collected Solids Cubic Feet	Enter Dry Bulk Density Solids Lb/C.F.	Calculated Weight of Dry Solids (Pounds)	
Street Sweepings	13,878	85	1,178,242	534,451
Catch Basin Cleanout	0	85	0	0
BMP Cleanout	0	85	0	0

### GREEN Denotes Cells for DATA ENTRY  
 ### BLUE Denotes Calculation Results

## NOTES:

1. "Particulate Matter" from the FSA Final Report is defined as "Solids" for use in this spreadsheet.
2. For measurements of volume, include approximate dry bulk density;  
 use the default bulk density of 1.36 or 84.9 pounds per cubic foot until confirmed by sampling.

# Calculated Nutrient Load Reductions from MS4 Maintenance Practices

FSA 2012

## TOTAL PHOSPHORUS

	Input and Output	Subtotal TP Removed (Kilograms)	Subtotal TP Removed (Pounds)
Street Sweepings - Dry Mass Collected (Kg)	534,451		
Amount of TP Removed (Kilograms)	193	193	425
Catch Basins - Dry Mass Collected	0		
Amount of TP Removed (Kilograms)	0	0	0
BMP - Dry Mass Collected	0		
Amount of TP Removed (Kilograms)	0	0	0
GRAND TOTAL TP REMOVED (KILOGRAMS) =		193	
GRAND TOTAL TP REMOVED (POUNDS) =			425

## TOTAL NITROGEN

	Input and Output	Subtotal TN Removed (Kilograms)	Subtotal TN Removed (Pounds)
Street Sweepings - Dry Mass Collected (Kg)	534,451		
Amount of TN Removed (Kilograms)	301	301	663
Catch Basins - Dry Mass Collected	0		
Amount of TN Removed (Kilograms)	0	0	0
BMP - Dry Mass Collected	0		
Amount of TN Removed (Kilograms)	0	0	0
GRAND TOTAL TN REMOVED (KILOGRAMS) =		301	
GRAND TOTAL TN REMOVED (POUNDS) =			663



## SWMP Inspection Schedule

### Response:

Each year the City of Lake Worth updates the high risk facility inventory in regards to the City MS4. The Information gathered during the 1<sup>st</sup> year permit application was gathered from a search of EPA databases which is found and posted on the NPDES website under Permit Elements-Industrial and High Risk Facilities (RCRAInfo TRIS CERCLIS) Excel Spreadsheet, ESRI?

After year 1: The City identified 214 potential facilities under the 2012 High Risk Facility EPA Query section.

118 of the 214 facilities were found to be in areas outside of the City's MS4 and were removed from the list.

Some of the facilities were found in areas that did not contribute to the City's MS4 and were removed from the list.

The remaining 96 of the facilities in the list are in the City of Lake Worth MS4, but not high risk as noted in the text. 52 Facilities such as dry cleaners, gas station, auto part stores, and etc: These facilities were removed from the list.

After an updated search of the EPA Database for High Risk Facilities

There are 43 Facilities remaining which fall under High Risk and those Facilities are being inspected, and reported in the year 3 permit application and are included as part of attachment D.

# **Attachment D**



## Facilities

Street Address	City of Lake Worth High Risk Facilities
202 S. H. St	2 Brother's Auto Repair
214 S. H. St.	Able Plumbing Inc.
412 S. H. St.	All Import Car Repair
1130A N. G. St	Atlantis Air Conditioning
331 S. Dixie Hwy	AVD Auto Service
747 Barnett Dr.	Beiter Battery
117 S. Dixie Hwy	Caroline Tire Co.
1320 S. J. St	Construction Hydraulics
429 Industrial St.	CWB Technologies (Home Automation)
1302 Wingfield St.	Devland Construction Co.
307 N. G. St	Gardens Towing Inc
1910 7th Ave N	Gas Systems Technology Inc
708 Barnett Dr	George's Custom Paint & Body Shop
1401 N. Dixie Hwy	Gonz Auto Collision Center
1401 N Dixie Hwy	Gonz Auto Collision Center Yard
1109 7th Ave N	J.L.G. Auto Repair
2628 Park St	Joy Towing Inc
2704 Park St	Joy Towing Inc
223 S. H. St	Kauff's Towing Storage Yard
901 S. Dixie Hwy	Lake Worth Auto Tech Inc.
117 College Street	Lake Worth Power Plant
1900 2nd Ave. N	Lake Worth Utilities Administration
301 College St.	Lake Worth Utilities Electrical Yard
1022 N. H. St	National Cremation & Burial Society Garage Yard
431 S. H. St	Paco's Auto Body Repair
418 S. H. ST	Palm Beach Collision Center
1107 Barnett Dr.	Palm Beach Contracting LLC
407 N. Dixie Hwy	Plastic Kingdom
714 Barnett Drive	Priority Towing
201 S. Dixie Hwy	Regal Decorating & Paint Center
323 S. H St	Sheen Towing
719 Barnett Dr.	STAR Pavement Supplies
305 S. H. St	Steve's Towing
2115 7th Ave N	Sullivan Electric & Pumps Inc
1934 7th Ave N	Tabel Enterprise Inc. Warehouse District
410 N. G Street	Tony's Body Shop
1823 7th Ave N	Vinnie's Auto Body Shop
1807 6th Ave N	W.E. Brodbeck Roofing Co.
744 Barnett Dr.	Warehouse District (Priority Towing)
1145 Barnett Dr	Wayne Akers Ford Service Garage
714 Barnett Drive	Worldwide Transmission
1100 Barnett Dr Suite 11	Lake Worth Commerce Home Team Pest Defense
1800-1816 Barnett	Lake Worth AA Commercial Park