

Village of Royal Palm Beach, Florida

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Paul L. Webster, P.E., C.S.M. Director of Public Works

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

RE:

Palm Beach County Municipal Separate Storm Sewer System (MS4)

NPDES Permit No. FLS00018 (Cycle 3) Response to Year 2 Annual Report Comments

Dear Allen,

Please find attached the response from the Village of Royal Palm Beach concerning your Year 2 Annual Report comments. FDEP requested the following additional information from the Village concerning our Year 2 Annual Report:

Stormwater Management Program Resources

Comment: The following co-permittees did not provide a discussion on the impacts of resource decreases to the implementation of the SWMP.

Response: The fluctuation in funding is due to a fluctuation in the funds for our capital improvement program (CIP). As projects progress and are completed each year the overall funding for the SWMP will fluctuate. This fluctuation in the CIP program does not have any impact on implementation of the SWMP.

Street Sweeping Program for TN and TP Reduction

Comment:

The following co-permittees did not use the Department-approved FSA Load Reduction

Tool.

Response:

We have re-calculated our TN and TP reduction using the FAS Load Reduction Tool. Our

reductions are: TN=247 lbs & TP=158 lbs. We can provide copies of the worksheet if required.

These are the only areas where additional information was requested from the Village. I trust that this response satisfies FDEP's request. Please let me know if you need anything additional.

Sincerely

Paul L. Webster, P.E., C.S.M. Director of Public Works

Cc:

Mr. Alan Wertepney, Mock Roos & Associates

File

Matty Mattioli Mayor Jeff Hmara Vice Mayor Fred Pinto Councilman Richard Valuntas Councilman David Swift Councilman Raymond C. Liggins, P.E. Village Manager

Attachment <u>#3</u> SWMP Effectiveness

Year 2 Report

In accordance with Part VI.B.2.:

- The ANNUAL REPORT shall include as an attachment an evaluation of the effectiveness of the permittee's SWMP in reducing pollutant loads discharged from the MS4. At a minimum, the permittee shall attach to the ANNUAL REPORT an explanation of how its SWMP is addressing each of the following:
- 1. Have stormwater pollutant loadings discharged from the MS4 decreased? Why or why not?

Yes, pollutant loadings have decreased.

The decrease in pollutant loadings can be attributed to many factors including the continued implementation of maintenance activities and best management practices (BMP's) such as litter control and street sweeping.

- 2. Which components of the SWMP are working well and are effective in reducing stormwater pollutant loadings? Why are they effective? All components of the current SWMP appear to be working well and are effective. They are effective because they provide a comprehensive approach to reducing pollutant loadings.
- 3. Which components of the SWMP are not working well and need to be revised to make them more effective in reducing stormwater pollutant loadings?

We have not identified, at present, any component of the SWMP that is not working well and needs to be changed.

4. Which components of the SWMP do not contribute to reducing stormwater pollutant loads and could be revised or eliminated, and why?

None.

5. Is the monitoring program providing data that can be used to assess the effectiveness of the SWMP in reducing stormwater pollutant loadings, assess the effectiveness of specific BMPs, and determine where stormwater retrofitting projects should be prioritized for implementation? *Yes*.

The evaluation is expected to be subjective and is intended to lead the permittee to consider which programs deserve more or less attention.