



TOWN OF SOUTH PALM BEACH

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September 3, 2013

Alan Wertepny
Mock, Roos & Associates, Inc.
5720 Corporate Way
West Palm Beach, Fl. 33407

Re: NPDES Permit Year 2 Annual Report Comments

Dear Mr. Wertepny:

In accordance with your email dated August 12, 2013, concerning the Palm Beach County Municipal Separate Storm Sewer System NPDES Permit Year 2 Annual Report Comments, please find the following response for the Town of South Palm Beach.

In Section IV, Fiscal Analysis part A and B should each be reported at \$1,000.

See Attachment Form Sheet 2 SWMP Effectiveness Year 2 Report.

Should you have any questions please contact me.

Sincerely,

Rex Taylor
Town Manager

Attachment Form Sheet 2
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?
Pollution loading may have been reduced minimally in our MS4 outlet. This would be the result of the training program and periodic cleaning of the catch basin.
 2. Which components of the SWMP are working well and are effective in reducing stormwater pollutant loadings? Why are they effective?
I believe the training videos that are seen by the permittees have been very helpful in raising awareness and changing operating procedures to reduce pollutant loading.
 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?
I do not have any recommendations as to which components of the SWMP are not working well.
 4. Which components of the SWMP do not contribute to reducing stormwater pollutant loads and could be revised or eliminated, and why?

While Public Education is important I believe this activity as part of the NPDES Permit constitutes a duplication of effort. Many other environmental education programs, including the public and private school systems, cover antipollution education including stormwater.

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, but more time will be needed to have a better understanding of the effectiveness.

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