From: Brandon, Karen [Karen.Brandon@aecom.com]
Sent: Tuesday, June 02, 2015 4:49 PM
To: Michelle.Bull@dep.state.fl.us
Cc: Alan D. Wertepny; Marcos Yvo Montes De Oca; Maryl N. Bacallao
Subject: City of Belle Glade Year 4 Annual Report RAI Response

Michelle,

Please see attached response. If you have any further questions or comments, please let us know.

Thank you,

Karen D. Brandon, P.E.
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June 2, 2015

Michelle Bull
NPDES Stormwater Program
Florida Department of Environmental Protection
2600 Blairstone Road MS3585
Tallahassee, FL 32399

Re: Palm Beach County Municipal Separate Storm Sewer System (MS4)
NPDES Permit No. FLS00018
C3Y4 Annual Report RAI
City of Belle Glade

Dear Ms. Bull:

In response to your email of May 26, 2015, following are our responses:

Part III.A.1

- Reported 0 Major outfall inspections and 0 MS4 pipe inspections throughout permit cycle. Please review permit language regarding inspection activities. Pipes and structures may be visually inspected to confirm proper flow and operation. **Provide the structural inspection SOP, and submit a plan for inspecting structures by the end of the permit cycle.**

  The City Public Works Department will commit to completing the Major Outfall Inspections and 50% of the Pipe/Culvert Inspections before the end of this permit cycle. This will bring the City up to date with the original Pipe/Culvert SOP commitment to inspect 10% a year. The SOP's for these inspections have been modified accordingly. Moving forward, the remaining 50% of the pipes/ culverts will be inspected next permit cycle and the Major Outfalls will be inspected twice a year.

Part III.A.7.c

- Reported 0 proactive inspections years 2-4. **Submit a plan for updating SOP and performing proactive inspections of entire MS4.**

  The City Public Works Department will commit to performing the proactive inspections for Illicit Discharges as part of their regular Litter Control Program (removing litter from storm drains) and their swale maintenance (mowing) program.

AECOM

Part III.A.8.a

- Reported 1 HRF. **Report the type of facility, and whether facility was inspected.**

  The High Risk Facility was identified as Sugar Supply Inc. According to the EPA TRI Explorer Facility Profile Report, it is a Petroleum and Petroleum Products Merchant Wholesaler. The facility was inspected by Public Works staff on May 13, 2014 and no evidence of potential illicit discharges was found.

Part III.A.9.c

- Reported 1 active permittee construction site, however Percentage inspected Comment states "No active construction sites." **Provide clarification on number of active construction sites during the reporting year.**

  There was one (1) active construction site – the Pavilion. Inspections were performed by City Public works staff. The percentage of active construction sites inspected should have been reported as 100%.

Part III.A.9.c

- Reported 0 refresher training. **Explain why no refresher training was performed.**

  The refresher training provided by the PBC NPDES Steering Committee is typically held in Palm Beach Gardens once a year. It is difficult for City staff to spend a half day to drive to Palm Beach Gardens and attend the training. City staff will make a commitment to either attend the training provided or check out the DVD from Mock Roos and view the DVD at the City Public Works Dept.

If you require any additional information, please let me know.

Sincerely,

Debbie Williams

for Karen D. Brandon, P.E.

KDB/dw

Encl.

cc: Marcos Montes De Oca, City of Belle Glade
Alan Wertepny, MRA

City of Belle Glade – Rev. 06-02-15
Pipes/Culverts and Inlets/Manholes – Structural Control Inspection
Standard Operational/Maintenance/Documentation Protocol

There are nine (9) miles of pipe/culvert that are part of the City's MS4. The locations are shown on the following map. This value and the locations on the map do NOT include exfiltration trench, which is catalogued separately.

There are 200 inlets/catch basins/manholes that are part of our MS4. Their locations are also shown on the following map.

Inspections:

In order to catch up for this permit cycle, 50% of the pipes/culverts will be inspected before the end of this permit cycle, September 30, 2015. Moving forward, at least 10% of the total number of linear feet of pipe/culvert is inspected each year. The inlets, catch basins, and manholes associated with a pipe/culvert system are inspected concurrently. Visual inspections are conducted in accordance with the checklist/procedure that follows. Inspection forms are not used. If warranted, as a result of the visual inspection, a work order for maintenance, repair, or a more detailed pipe or structure investigation is generated. A more detailed investigation may include televising the pipe, or using mirrors or other devices, as appropriate, to determine the condition of the pipe/culvert. As a result of the more detailed investigation, a work order for maintenance or repair may be generated.

Maintenance:

There are several maintenance activities that may be associated with stormwater networks . The appropriate activity is chosen to correspond to the reported condition. The following activities may be required:

1. Remove trash and debris and dispose of properly.
2. Remove accumulated vegetative matter and dispose of properly.
3. Remove accumulated sediment and dispose of properly.
4. Remove barnacles and/or other marine life and dispose of properly.
5. Repair/replace the headwall at the end of the pipe, if applicable.
6. Repair/replace pipe or structure, if needed.

Documentation:

The documentation for the inspection and maintenance activities related to the pipes/culverts and inlets/manholes is the Pipes/Culverts Structural Control Inspection form.

Pipes/Culverts – Structural Control Inspection

VISUAL INSPECTION:

Evidence of settling above the pipe alignment? *YES* *NO*

Sediment accumulation in pipe (viewed from inlets, manholes, etc.)? *YES* *NO*

Barnacle accumulation in pipe (viewed from inlets, manholes, and/or outfall)? *YES* *NO*

If *YES*, schedule for maintenance and report to supervisor for further investigation.

City of Belle Glade – Rev. 6/2/15
Major Stormwater Outfalls – Structural Control Inspection
Standard Operational/Maintenance/Documentation Protocol

There are six (6) major stormwater outfalls (MSWOs) that are part of the City's MS4. A MSWO is defined as:

- an outfall pipe larger than 36-inch inside diameter (or its equivalent), OR
- discharge from a single conveyance other than a pipe that serves a drainage area of 50 acres or more, OR
- an outfall pipe larger than 12-inches inside diameter (or its equivalent) that serves a drainage area containing industrial land uses, OR
- discharge from a single conveyance other than a pipe that serves a drainage area of 2 acres or more than include industrial land uses.

The MSOWs within our MS4 are located on the following map.

Inspections:

MSWOs will be inspected before the end of the current permit cycle, September 30, 2015. In subsequent permit years they will be inspected twice annually, or more frequently if historic operations indicate that it is needed for a particular MSWO. Inspections are conducted in accordance with the following Structural Control Inspection Form.

The anticipated inspection schedule follows:

In May before the start of the wet season, and in December.

Maintenance:

There are several maintenance activities that may be associated with MSWOs. The appropriate activity is chosen to correspond to the reported condition. The following activities may be required:

1. Remove trash and debris and dispose of properly.
2. Remove accumulated vegetative matter and dispose of properly.
3. Remove accumulated sediment and dispose of properly.
4. Maintain earthen bank adjacent to the discharge pipe or headwall.
5. Maintain the headwall at the outfall, if applicable.
6. Repair/replace pipe if needed.

Documentation:

The documentation for the inspection and maintenance activities related to major stormwater outfalls is the Major Stormwater Outfall Structural Inspection form.

Major Stormwater Outfalls – Structural Control Inspection

Facility ID: _____ Date: _____

FUNCTION:

Debris or sediment accumulation in pipe?	*YES*	*NO*
Barnacle accumulation in pipe?	*YES*	*NO*
Sediment accumulation in receiving water?	*YES*	*NO*
Pipe in need of repair/replacement?	*YES*	*NO*

If *YES*, report to supervisor for further investigation or schedule for maintenance.

GENERAL:

Any indications of illicit discharge or illegal dumping?	*YES*	*NO*

If *YES*, describe and report to supervisor for proper response: _____

Signs of erosion on bank near outfall?	*YES*	*NO*
Rip-rap in need of maintenance?	*YES*	*NO*
Headwall in need of repair/replacement?	*YES*	*NO*

If *YES*, schedule for maintenance.

Proactive Inspection Program

Section III.A.7.c – Illicit Discharges and Improper Disposal – Inspection and Investigation of Suspected Illicit Discharges and/or Improper Disposal

This permit element requires a written **proactive inspection program** 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.

Proactive Inspections Written Program Components

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

Proactive Inspection Program (Written Procedures)

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

   The attached map depicts the extent of our MS4 contributing area; areas zoned as industrial, commercial or mixed use; areas with on-site septic systems; and, currently identified impaired water body segments. Facilities that have been identified as the source of illicit discharges in the past are also noted on the map. "Older infrastructure" is not indicative of an increased potential to contain incidences of illicit discharges/connections/dumping.

2. **List of identified priority areas/facilities**

   A list (or, An attached map) of the priority proactive inspection area/facilities follows. Priority facilities are checked against the list of facility types associated with the FDEP MSGP Sectors (see attached list) to determine their need to be covered by a 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. The schedule for inspecting the priority areas/facilities is one-fifth (1/5) of the facilities per 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. A standardized inspection form is used (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.

5. **Procedure for tracing source of discovered illicit discharge**
   (See Illicit Investigation Procedures)

6. **Procedure for eliminating the discharge**
   (See Illicit Investigation Procedures)

7. **Procedure for documenting the inspections and enforcement activities**
   (See Inspection Form)

8. **Procedures for enforcement actions (or referrals to appropriate jurisdictional authority)**
   (See Illicit Investigation Procedures)

9. **Identification of staff /department/outside entity responsible for inspections and for enforcement**
   Carl Jones, Code Enforcement Public Works Litter Control and Streets maintenance staff.

10. **Description of resources allocated to implement this permit element**
    District Engineer research of MSGP sites (annually)
    Inspection time by City staff (annually)

Proactive Illicit Discharge/Illegal Connection Inspection Form

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: _____

City of Belle Glade
Illicit Investigation Procedures

The intent of the City of Belle Glade's (City) illicit investigation program is to identify the existence, location, source and responsible party, and to terminate the illegal connection. Investigative procedures to identify and terminate illicit discharges can be divided into five processes: Identification, Source Tracking, Responsible Party, Enforcement and Documentation.

Identification

Illicit discharges enter the MS4 through either direct connections (wastewater piping, wash water, floor drains, etc.) or indirect connections (infiltration, direct dumping, spills collected by storm drains, etc.). Identification of potential illicit discharges can be accomplished by using several existing inspection and monitoring programs, field screening of municipal outfalls, responding to citizen complaints, stormwater facilities operation and maintenance activities, and public education activities.

Following the identification of an illicit discharge or illegal connection, an inspection and report must be completed. The report provides details of violations and subsequent corrections. The inspection report is the basis for subsequent enforcement and corrective action. A written report should be made for every inspection to document site conditions. The report should be written legibly, accurately, and in clear and concise language. All violations observed for each inspection should be documented. It is recommended that photographs, noting the date and time, and any water quality sampling/testing information be included with the inspection report.

Source Tracking

Once a suspected illicit discharge has been identified, the source of the discharge needs to be located. The source tracking process may consist of the following:

- Determining if the discharge is definitely an illicit discharge.
- Determining the source of the discharge.
- Conducting a site inspection and documenting the findings.
- Writing a notification to the owner with the findings/results of the inspection report.

Illicit discharges can occur in any segment of the MS4 at any given time, and they can be continuous or intermittent flows. Detection of illicit discharges requires adequate knowledge of the MS4. The following is a list of items that could be instrumental in determining the source of illicit discharges.

- Town complaint logs of suspected illicit discharges.
- Outfall location maps.
- MS4 stormwater system maps (pipes, manholes, catch basins, and canals).
- Utility/Septic Tank maps.
- Land use maps.

- High-risk facility inventory.
- Tax maps.

Illicit discharges should be tracked within the MS4, to find the location/owner of the source. Using outfall maps and MS4 maps, the flow of the illicit discharge can be tracked back through the MS4. Ideally, these field investigations would be done in dry weather so as not to confuse an illicit discharge with stormwater flow. Starting from the outfall or point of illicit discharge identification, visual observations using manholes and catch basins can be used to trace the flow and isolate the section of MS4 that is receiving the illicit discharge. A written report of the site inspection and conclusions should be prepared.

Further site assessment of the surrounding drainage area and suspected facilities by a competent environmental professional may be necessary to determine the party responsible for the illicit discharge.

Responsible Party

Once the source of the illicit discharge has been determined, the party responsible for the discharge can be identified with tax maps or through the Palm Beach County Property Appraisers Office website (www.co.palm-beach.fl.us/papa/index/htm). The owner should be notified in writing of the illicit discharge and be provided a copy of the investigation report.

Enforcement

The City is responsible for the water quality of the discharge from their MS4. When an illicit discharge or illegal connection is detected, it is the responsibility of the City to determine the appropriate legal authority and to ensure that the connection is terminated. The City's stormwater control ordinance provides the authority to order any person to immediately cease any discharge, or connection to the stormwater system determined to be in violation of the ordinance.

Several entities within Palm Beach County share the use of MS4s. Municipal ordinances and interlocal agreements have been set in place to provide for the legal authority to prohibit illicit discharges. The municipality responsible for the initial investigation should notify the appropriate legal authority so that measures may be taken to terminate the illicit discharge.

Once a violation has been identified and documented by an inspection report, steps must be taken to eliminate the illicit discharge. The violation must be brought to the attention of the responsible party and they should be provided with a copy of the inspection report. Discussion with the responsible party should be held regarding the observed cause of the violation and the requirements of the stormwater control ordinance for its correction. Attempts should be made to achieve voluntary compliance by the responsible party. Generally, voluntary compliance at the time of the inspection can resolve most investigations.

It is advised that a courtesy violation letter be sent by regular mail or certified mail, depending on whether a written response is required within a specified timeframe. After the courtesy violation letter, a re-inspection to review the non-compliance issues should be scheduled. If all

necessary corrections have been made and the site is in compliance, a letter of compliance can be issued and regular inspections resumed.

If, at the time of re-inspection, corrective action has not been completed, a Notice of Violation should be issued to the responsible party. The Notice of Violation should be sent via certified mail, return receipt requested. The Notice of Violation should clearly list all items not in compliance and give a deadline to bring those items into compliance. Following the allotted correction period another re-inspection should be scheduled to ensure that all items have been addressed. If all corrections have been made, a letter of compliance can be issued and regular inspections resumed.

If voluntary compliance is not achieved after the Notice of Violation, official code enforcement actions should be taken. The appropriate legal authority should proceed with enforcement actions to eliminate the illicit discharge. For more serious offenses, enforcement may include local consent orders or referrals to the Florida Department of Environmental Protection, Palm Beach County Environmental Resources Management or Department of Health and Human Resources. The investigator should always be prepared for code enforcement hearings with inspection records, pictures, water quality information, violation courtesy letters, and Notice of Violation.

Documentation

Records of enforcement action will be maintained and be documented in the NPDES annual report.