

# CITY OF DELRAY BEACH



100 N.W. 1st AVENUE • DELRAY BEACH, FLORIDA 33444 • 561/243-7000



June 10, 2015

Michelle Bull  
Florida Department of Environmental Protection  
NPDES Stormwater Program  
2600 Blair Stone Road MS 3585  
Tallahassee, FL 32399

Ms. Bull,

The City of Delray Beach has prepared the following response to the NPDES Annual Permit Report Cycle 3 Year 4 Request for Additional Information dated May 26, 2015.

Part III.A.1

- **Report the number and percentage of grass treatment swales inspected in Year 4.**

*The City maintains a proactive approach to swale development and as a measure has installed over 56100 linear feet of swales in the past five years. Continual updates to the MS4 inventory are made throughout the year and as with other infrastructure data, total square footage of all swales is revised as the data is processed and verified. Currently the City has approximately 96,913 linear feet of swales. In addition to the routine annual inspections of city structures, swales both public and private being above ground are subject to continual visual inspection throughout the year by multitude of city employees as well as the general public and local citizen base. Maintenance of city swales is routinely performed through trash collection, general maintenance mowing and proactive sod replacement. In FY 2014, the city inspected 16,535 linear feet (17%) of swales. The city is reviewing the Swale Inspection SOP for completeness and potential revision. Should the review indicate SOP modifications are necessary to accommodate program requirements, revisions will be drafted and submitted to the DEP for approval prior to implementation.*

- Minimum inspection frequencies for the permit cycle have not been met for exfiltration trenches, grass treatment swales, dry detention, pollution control boxes (required to quarterly), major outfalls, MS4 pipes and inlets/catch basins. **Provide SOPs for inspecting all stormwater structural controls and be prepared to discuss inspections during the audit.**

*The City of Delray Beach SOPs have been included on the provided disc. (see SOP Document folder)*

*The city strives to provide efficient and effective stormwater management to the citizens and general public. The area has a growing population base, demanding special events calendar and seasonal tourist pressure which annually contribute to a challenging municipal responsibility. In addition the city experienced storm events exceeding the 100 year rate in early 2014 resulting in localized flooding and pressure to the city system and municipal operational capacity.*

*The city owns and operates one CCTV vehicle which is utilized for infrastructure inspection purposes. The vehicle is primarily owned/housed within the water and sewer department and shared with the stormwater department thus is subject to an annual rotational schedule. During the current permit cycle, the City acquired a portable pole mounted haloptic envirosight camera system an alternative solution to prevent future inspection frequency deficiencies and alleviate the reliance and dependence upon the cctv vehicle.*

*Through annual program evaluation the city has identified its challenges in relation to NPDES compliance and implemented an action plan for system operation, infrastructure inspection and data management over the next permit cycle. The aggressive plan is a cooperative effort with various internal municipal entities and contracted consultants for select efforts. The City is currently developing a Cartegraph workflow management database system and is in the process of transferring the MS4 inventory data from AUTOCAD to a GIS based platform. The spatial database will be linked to the inventory database which will enhance operational efficiency, planning efforts, and emergency management abilities. Stormwater Infrastructure data integration is scheduled for completion in 2015-2016. A training plan is in place for pertinent city staff. Documentation of efforts to address deficiencies have been provided on disc. (See Stormwater Fee Eval Report-Draft, and Delray Beach.NPDES Complainece)*

- Be prepared to discuss the change in inventory for dry retention, dry detention, and wet detention.

*This item deficiency was due to a clerical error and mis-interpretation of the definitions... the city has 22 dry and 1 wet detention areas.*

### Part III.A.3

- Did not report an estimated amount of litter collected. Be prepared to discuss the litter control program during the audit.

*The City of Delray Beach utilizes both in-house staff and contractor services to perform litter control on public property including public parks and right-of ways. An amount unit*

measurement has not been tabulated in previous years. Appropriate internal staff have been notified of this requirement and measures to rectify the deficiency have been implemented.

- **Provide street sweeping nutrient loading removal calculations.**

*As directed by the report instructions, I utilized the automated Load Reduction Tool located at [www.florida-stormwater.org/research](http://www.florida-stormwater.org/research). Based upon the cities reported volumetric collections, the automated calculation program provides a Total Nitrogen and Total Phosphorus figure. An apparent clerical error was made when entering data into the Load Reduction Tool. The Total Phosphorus removed was 432 lbs and the Total Nitrogen Removed was 673 lbs. The Load Reduction calculations are provided.*

Part III.A.4

- **Provide an explanation for why a flood control project did not include stormwater treatment.**

*The city had mis-interpreted the definitions thus a reporting error was made. In FY 2014 no Flood Control projects were constructed. The one project that was reported as Flood Control was actually a Stormwater Retrofit project. The project entailed construction of swales in selected areas that previously had no swales and were subject to periodic flooding issues. The constructed swales provide a passive water quality treatment benefit. Project information has been provided on disc. (See FloodControlSwales).*

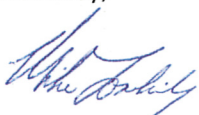
Part III.A.9

- **Reported 0 operator training. Be prepared to discuss why no initial training was performed.**

*The city was mis-interpreting the requirement. Through conversations with the FDEP, the city now has clear understanding of the task item. In FY 2014 the city conducted 32 events which provided for operator training. Documentation has been provided on disc (See RE III.A.9NPDES question, and RE III.A.9NPDES)*

We trust that the information provided within and on the enclosed disc is sufficient to fulfill the additional information request. Should there be additional information required subsequent to this review we will provide to you in a timely fashion. We look forward to working with you and FDEP towards the resolution of this matter and building a solid and effective NPDES program.

Sincerely,



Mike Lopushinsky  
Stormwater Administrator  
City of Delray Beach