

**From:** jack horniman [jlh\_a@yahoo.com]  
**Sent:** Sunday, May 24, 2015 1:27 PM  
**To:** Alan D. Wertepny  
**Subject:** JIC NPDES Audit

Alan,

Attached is the Town Responses to the FDEP Comments on the JIC NPDES Report. I wrote the Response to A.7.c. based on no commercial or industrial sites in JIC, but read the attached SOP to determine whether I need to expand my Response. Thanks. Have a great Memorial Day week-end. I will await your comments before forwarding to the Town.

Jack

<https://inetmail/owa/?ae=Item&t=IPM.Note&id=RgAAAAA5k36Im%2fTaQo6ziuOnaZb8...> 5/26/2015

## MEMORANDUM

**To:** John Pruitt, Clerk, Town of Jupiter Inlet Colony &  
Alan Wertepny, Coordinator, Palm Beach Countywide NPDES Stormwater  
Permit Program

**From:** Jack Horniman, JLH Associates, Town of Jupiter Inlet Colony Planning  
Consultant

**Re:** 'Responses' to Comments issued by FDEP on the Town of Jupiter Inlet Colony  
FY 13/14 Annual NPDES Report for the June 9, 2015 Audit Meeting

**Date:** May 26, 2015

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The following 'Responses' to the FDEP Comments on the Town of Jupiter Inlet Colony (JIC) FY 13/14 Annual NPDES Report are provided in anticipation of the scheduled June 9, 2015 JIC NPDES Audit:

- 1) **FDEP Comment, Part III.A.3.:** Be prepared to discuss the Litter Control Program during the audit.

**Town Response:** The Comment provided for the **PERMITTEE Litter Control Program; frequency of litter collection** is addressed in the **Comment** column explaining that individual property owners maintain the swale areas in front of their homes. The Town is almost entirely developed as a single family, low density residential community with a small public administrative building and a private beach club. There are no commercial or industrial uses within JIC.; therefore the litter control program is not extensive. The Town has historically reported its litter control program this manner without comment.

- 2) **FDEP Comment, Part III.A.7.c.:** Reported 0 proactive inspections. Be prepared to discuss the proactive inspections program, and bring the SOP to the audit.

**Town Response:** As stated above, the Town is developed primarily as single family, low density residential community with a Town administrative building and private beach club. There are no commercial or industrial uses in JIC. Therefore, proactive inspections necessary not necessary during the permit year. The SOP is attached to this Memorandum for the audit.

- 3) **FDEP Comment, Part III.A.9.c.:** Reported 0 active private construction sites, and 4 sites inspected. **Please update the number of active construction sites during the reporting year.**

**Town Response:** The active private construction sites will be changed to reflect 4 sites.



## **Proactive Inspection Program**

### ***- Town of Jupiter Inlet Colony -***

#### **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

Jupiter Inlet Colony is developed as a single family residential community. There is only one (1) residential lot available for future residential development. There are no Commercial or Industrial uses in Jupiter Inlet Colony, nor are they allowed by local land use and zoning regulations.

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

Priority areas/facilities shall be the Town's outfalls, grass swales and piping system connecting those facilities.

### **3. Annual schedule for inspections**

The stormwater outfalls are inspected two (2) times per year and are recorded on 'Dry Weather Field Screening Forms'. The grass swales throughout the community are inspected regularly (daily) by the Police Department as part of their patrols. At the end of the year an Annual Summary is recorded which identifies any problems of illicit discharges or illegal dumping. The Town shall continue these practices until such time that more is needed. If illicit discharges are identified at any time, they shall be immediately recorded on the "Proactive Illicit Discharge/Illegal Connection Inspection" Form attached hereto and reported to the Town Administrative Officer for administrative action. As stated in 1. above, there are no Commercial (businesses) or Industrial uses within the Town; therefore, no MSGP's are required.

### **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/site. Standardized

inspection forms will be used ( Dry Weather Screening Form for outfalls; Grass Swale for swales; and, Piping/Culverts Forms for piping system)

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 will be 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 to issues noted in the field, or completes a work order form for the appropriate personnel to complete the investigation.

5. Procedure for tracing source of discovered illicit discharge

If illicit discharges have been identified at the outfall locations, the entire stormwater system system and structures will be traced back to the grass swales. Likewise, if illicit discharges or illegal dumping is observed in grass swale s, the entire system to the outfall locations will be inspected to identify the source.

6. Procedure for eliminating the discharge

Property owner to be put on notice with time frame for compliance. Enforcement shall be in accordance with the Town's Code Enforcement procedures, including fines allowed by Law, until discharge is eliminated. In some cases if contamination cleanup is severe, the Town may seek funds from the designated offender. Should discharge be determined to be immediately detrimental to Public Health and Safety (i.e. large fuel spill) Palm Beach County (PBC) Fire Haz-mat may need to be notified. Town to coordinate all agencies involved in an incident and obtain and record under this section any and all reports generated by outside agencies.

7. Procedure for documenting the inspections and enforcement activities

Reference Dry Weather Screening, Grass Swale, Pipes/Culverts and Annual Summary Forms utilized by the Town.

8. Procedures for enforcement actions (or referrals to appropriate jurisdictional authority)

Shall be in accordance with the Town's Code Enforcement procedures, as revised from time to time. In the case where outside agency may have jurisdiction that jurisdiction shall be notified in writing explaining the violation being observed.

9. Identification of staff /department/outside entity responsible for inspections and for enforcement

- 1) Town Police Department
- 2) Town Administrative Officer
- 3) Planning Consultant

Outside Agencies that have potential involvement:

- 1) PBC Health Department
- 2) PBC Fire Rescue-Hazmat Division

10. Description of resources allocated to implement this permit element

Town budget and special assessments, if needed, of violators. The Town's budget should cover all personnel and contractors initially involved.

**Proactive Illicit Discharge/Illegal Connection Inspection Form**  
**- Town of Jupiter Inlet Colony -**

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: \_\_\_\_\_



