

From: Brian Gentry [BGentry@pbcgov.org]
Sent: Tuesday, May 26, 2015 9:38 AM
To: Bull, Michelle
Cc: Alan D. Wertepny; Bonnie Finneran; Craig Lloyd; David Young; Edmund Gibson
Subject: RE: Palm Beach County Year 4 Annual Report RAI

Michelle,
Please see the responses provided below;

Part III.A.1

Recent reinspections of major outfalls that were previously inspected in permit year 3 revealed no changes. For a more historical perspective; the major outfalls were inspected and photographed during the previously required outfall field screening program and then several years later were revisited to GPS and photograph the outfalls for an improved outfall map. No changes were noted between these inspections. This work was conducted in the mid and late 1990s and unfortunately the historical photographs are no longer available.

Palm Beach County (PBC) outfalls discharge to secondary (298 Drainage District) canals with stable banks, modest flow velocities and are not subject to the wear and tear of outfalls to dynamic waterways such as rivers and estuaries.

A review of the 3rd Term Annual reports Major Outfall Inspections reveals that 67% were inspected in year 3 and 13% in year 4. During the current year 5 permit year the PBC Engineering Dept. shall inspection the remaining 20% to complete inspections of all Major outfalls during the permit term. If this proposed less frequent inspection schedule is unacceptable to DEP, please let me know. However, our Engineering staff are confident that annual inspections of all our major outfalls is not a worthwhile use of their staff resources.

Part III.A.2

Please see the attachment from the Palm Beach County Land Development Division.

Part III.A.9.c

During permit year 4, 6 PBC staff received the initial DEP Sediment and Erosion Control certification. All PBC Engineering Dept. and Environmental Resource Management Dept. (ERM) NPDES construction oversight field inspectors have previously received the initial DEP Sediment and Erosion Control certification. These staff members use the knowledge gained on a daily basis. I'm inspector #102 and supervise the ERM Dept. inspectors and conduct many inspections myself. From my own perspective, retaking the initial DEP Sediment and Erosion Control certification course would not be of significant benefit. Regarding refresher training, this permit year we'll make available the Erosion and Sediment Control DVD the NPDES group maintains to PBC Engineering and ERM staff that may benefit from refresher training.

If you have any questions or comments on the responses above, please contact me.

Brian Gentry
Environmental Program Supervisor,

INTEROFFICE MEMORANDUM

DATE: December 2, 2014

TO: Rob Robbins, Director
Environmental Resources Management

FROM: Joanne M. Keller, PE, Director
Land Development Division

RE: NPDES Permit Requirements

Based on the Year 2 review of the County's Land Development Regulations in relation to potential impediments to low impact design practices for stormwater runoff, we find that no changes to the current regulations are necessary or desirable at this time.

Stormwater discharge limits and water quality treatment requirements consistent with State standards are already applied to all new projects by SFWMD regulations and no more stringent standards are imposed by the County. Incorporation of low impact design practices by the developer is possible and not precluded by current County standards.

However, since there minimum standards of SFWMD must still be met, there is no justification for the County to mandate inclusion of these additional onsite measures in site development.

JMK: TWM

cc: Tanya N. McConnell, PE, Deputy County Engineer
David Young, PE, Roadway Production
Brian Gentry, Environmental Program Supervisor