

From: Carol Saunders
Sent: Friday, July 10, 2015 3:44 PM
To: 'Michelle.Bull@dep.state.fl.us'
Subject: FW: Village of Royal Palm Beach Year 4 Annual Report RAI

Good Afternoon---

Please see attached response.

Thanks,

Carol Saunders
Public Works Department
Village of Royal Palm Beach
561-790-5122
561-791-7075 fax
csaunders@royalpalmbeach.com



Village of Royal Palm Beach, Florida

10996 Okeechobee Boulevard Royal Palm Beach, Florida 33411
Telephone (561) 790-5122 Fax (561) 791-7075 E-mail: pwebster@royalpalmbeach.com

Paul L. Webster, P.E., C.S.M.
Director of Public Works

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

July 10, 2015

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

RE: Palm Beach County Municipal Separate Storm Sewer System (MS4)
NPDES Permit No. FLS000018-003 (Cycle 3)
Response to Year 4 Annual Report RAI
Village of Royal Palm Beach

Dear Ms. Bull:

The following is our response to your request for additional information on the Year 4 Annual Report from the Village of Royal Palm Beach:

1. Section VII, Part III.A.6: Is fertilizer applied on Village owned or maintained property? *Yes, fertilizer is applied to Village owned property and roadway landscaped areas that are maintained by the Village. The Village has eight (8) persons trained in Green Industries Best Management Practices and are FDACS certified applicators. We have attached a copy of the revised Annual Report that reflects this training and certification.*
2. Section VII, Part III.A.7.c: Reported 0 training. Explain why no training was performed. *We erred in reporting "0" for the training performed. We had 3 employees that received initial training. We had 27 contractors that received refresher training. We have attached a copy of the revised Annual Report page that reflects this training.*
3. Section VII, Part III.A.7.d: Reported 0 training. Explain why no training was performed. *We erred in reporting "0" for the training performed. We had 3 employees that received initial training. We had 27 contractors that received refresher training. We have attached a copy of the revised Annual Report page that reflects this training.*
4. Section VII, Part III.A.9.a: Reported 0 ERP coverage confirmed (also noted in the Year 3 audit report). Submit a site plan review SOP including the processing for confirming and tracking ERP/CGP coverage. *We erred in reporting "0" ERP coverage confirmed. We confirmed coverage on 6 sites. We have attached a copy of the Engineering Departments SOP; Construction Site Inspection Plan and Inspection Form.*
5. Section VII, Part III.A.9.b: Please confirm that 6% of private construction sites were inspected. *We erred in reporting "6%" for the number of private construction site inspected. The number of private construction sites inspected was 75%.*

Matty Mattioli
Mayor

Richard Valuntas
Vice Mayor

Fred Pinto
Councilman

Jeff Hmara
Councilman

David Swift
Councilman

Raymond C. Liggins
Village Manager

6. Section VII, Part III.A.9.c: Reported 0 training (also noted in the Year 3 audit report).
Explain why no training was performed. *We erred in reporting "0" training performed.
We had 27 contractors that received training.*

We trust that this response satisfies your comments. If you have any questions or comments concerning the above please contact me at (561) 790-5122.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul L. Webster', with a large, stylized loop at the end.

Paul L. Webster, P.E.
Director of Public Works

Cc: Mr. Raymond Liggins, P.E., Village Manager
Mr. Alan D. Wertepny, P.E., Mock, Roos & Associates, Inc.
File

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A. Permit Citation/ SWMP Element	B. Permit Requirement/Quantifiable SWMP Activity	C. Number of Activities Performed	D. Documentation / Record	E. Entity Performing the Activity	F. Comments
	<ul style="list-style-type: none"> Municipal waste fleet maintenance facilities; and Any other municipal waste treatment, waste storage, and waste disposal facilities. <p>Report the number of applicable facilities and the number of the inspections conducted for each facility.</p> <p><i>DEP Note: The permittee needs to "customize" this section by listing the names of the applicable facilities in Column B and the number of inspections of each facility in Column C. Add more rows if necessary. If "0" is reported in Column C for the number of inspections conducted and the permittee has one or more applicable facilities, please provide an explanation in Column F for why no inspections were conducted. An applicable facility under Part III.A.5 includes, but is not limited to, those facilities/yards where street sweeping material and/or yard waste are temporary stockpiled, and where solid waste collection vehicles are parked and/or maintained. In addition, if the same facility is applicable under both Parts III.A.3 and III.A.5 of the permit, the same site inspection can count towards both inspection requirements as long as it covers the applicable waste area(s). Be sure to report the site inspection under both Parts III.A.3 and III.A.5.</i></p>				
		Number of Inspections			
	Name of facility #1: PBC Solid Waste Authority Transfer Station	4	High Risk Facility Checklist	Public Works	SWA Transfer Station is located within the Corporate limits of RPB, but stormwater flows to Lake Worth Drainage District.
	Name of facility #2:				
	Name of facility #3:				
	Name of facility #4:				
Part III.A.6	Pesticides, Herbicides, and Fertilizer Application				
	<p>Continue to require proper certification and licensing by the Florida Department of Agriculture and Consumer Services (FDACS) for all applicators contracted to apply pesticides, herbicides, or fertilizers on permittee-owned property, as well as any permittee personnel employed in the application of these products. Report the number of permittee personnel applicators and contracted commercial applicators of pesticides and herbicides who are FDACS certified / licensed. Report the number of permittee personnel and contractors who have been trained through the Green Industry BMP Program, and the number of contracted commercial applicators of fertilizer who are FDACS certified / licensed.</p> <p><i>DEP Note: If "0" is reported in Column C for any of the reporting items, please include in Column F an explanation of why training was not provided to / obtained by personnel and contractors during the applicable reporting year, the most recent year that training / certification was previously provided / obtained, and the names of the personnel and contractors previously trained / certified.</i></p>				
	PERSONNEL: Florida Department of Agriculture and Consumer Services (FDACS) certified applicators of pesticides and herbicides	8	Agriculture and Consumer Services – Public Applicator License		
	CONTRACTORS: FDACS certified / licensed applicators of pesticides and herbicides	Aquatics	Vendor Files	Public Works	

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	CONTRACTORS: FDACS certified / licensed applicators of fertilizer PERSONNEL: Green Industry BMP Program training completed	0	Vendor Files		
		3	Human Resources Training Files		
	CONTRACTORS: Green Industry BMP Program training completed	Unknown			
	<p>Pursuant to SB 2080 (2009), all local governments are encouraged to adopt a Florida-friendly Landscaping Ordinance similar to the one set forth in the document "Florida-friendly Guidance Models for Ordinances, Covenants and Restrictions." If the broader Florida-friendly ordinance described above is not adopted, then <u>all local governments within the watershed of a nutrient-impaired water body</u> shall adopt the Department's Model Ordinance for Florida-Friendly Fertilizer Use on Urban Landscapes pursuant to SB 494 (2009) or an ordinance that includes all of the requirements set forth in the Model Ordinance. <u>The ordinance shall be adopted within 24 months of the date of permit issuance.</u> Provide a copy of the adopted ordinance with the subsequent Year 1 or Year 2 Annual Report.</p> <p><i>DEP Note: This provision DOES NOT APPLY to ITID, NPBCID, SIRWCD. For all other permittees, if this provision is not applicable because the permittee is not within the watershed of a nutrient-impaired water body, then please indicate that in Column F, but do not remove this reporting item.</i></p> <p><i>DEP Note: Please provide the title and citation of the ordinance in Column D, and the name of the entity who finalized the ordinance in Column E.</i></p>				
	Year 1 or Year 2 ONLY: Attach copy of adopted Florida-friendly ordinance		Provided Year 1		
	<p>During Year 1 of the permit, develop and implement a written public education and outreach program plan to encourage citizens to reduce their use of pesticides, herbicides, and fertilizers. Report on the public education and outreach activities that are performed or sponsored by the permittee within the permittee's jurisdiction to encourage citizens to reduce their use of pesticides, herbicides, and fertilizers, including the type and number of activities conducted, the type and number of materials distributed, the percentage of the population reached by the activities in total, and the number of Web site visits (if applicable). Activities performed under the Florida Yards and Neighborhoods (FYN) program should only be reported if the permittee is contributing funding towards the FYN staff and program within its jurisdiction.</p> <p><i>DEP Note: The permittee should "customize" the list of public outreach activities by removing items or adding items to the list below as appropriate to their particular public outreach program. However, the reporting item of "Estimated percentage of the population reached by the activities in total" must remain unless the permittee chooses to reference the PBC Joint AR, as demonstrated in the first reporting item below. The permittee may add more specifics to the reporting items, such as the name of the brochure or newsletter distributed. If "0" is reported in Column C for all the reporting items, and the PBC Joint AR is not referenced, please include in Column F an explanation for why no outreach was performed.</i></p> <p><i>DEP Note: Indicate under Column E "Entity Performing the Activity" if FYN or IFAS is performing any of the reported public education and outreach activities. In addition, please complete the following line:</i></p>				
	<p>FYN PROGRAM FUNDING: Permittee Provides Funding? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Amount of Funding = See Joint Report</p>				
	<p>Public education and outreach program</p>				
	<p>ONLY LIST/REPORT BELOW ADDITIONAL EFFORT PERFORMED BY PERMITTEE. DELETE UNUSED LINES.</p>				
	Newspapers & newsletters: Number of articles/notices published	4	VRPB Newsletter	Village Clerk	
	Newsletters: Number of newsletters distributed	57,600	Village Clerk Files	Village Clerk	
	Web Site: Number of hits / visitors to the stormwater-related pages	309	I.S. Department page counter	I.S. Department	
Part III.A.7.a	<p>Illicit Discharges and Improper Disposal — Inspections, Ordinances, and Enforcement Measures</p>				
	<p>Where applicable, strengthen the legal authority to conduct inspections, conduct monitoring, control illicit discharges, illicit connections, illegal dumping and spills into the MS4 and to require compliance with conditions in ordinances, permits, contracts, and orders. Report amendments, as needed.</p>				

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	Reactive Investigations of reports of suspected illicit discharges/connections / dumping	1	Illicit Discharge Report	Public Works	
	Illicit discharges / connections / dumping found during a reactive investigation	1	Illicit Discharge Report	Public Works	
	Notices of Violation (NOVs) / warning letters / citations issued for Illicit discharges / connections / dumping found during a reactive investigation	0			
	Fines issued for illicit discharges / connections / dumping found during a reactive investigation	0			
	During Year 1 of the permit, develop and implement a written plan for the training of all appropriate permittee personnel (including field crews, fleet maintenance staff, and inspectors) and contractors to identify and report conditions in the stormwater facilities that may indicate the presence of Illicit discharges / connections / dumping to the MS4. Refresher training shall be provided annually. Report the number and type of training activities, and the number of permittee personnel and contractors trained (both in-house and outside training).				
<i>DEP Note: If "0" is reported for either reporting item, please include in Column F an explanation of why training was not provided to / obtained by personnel and contractors during the applicable reporting year; the most recent year that training was previously provided / obtained, and the names of the personnel and contractors previously trained.</i>					
	Personnel trained	3	0		
	Contractors trained	0	27		
Part III.A.7.d	Illicit Discharges and Improper Disposal — Spill Prevention and Response				
	Annually review (and revise, as needed) and implement the permittee's written spill-prevention/spill-response plan and procedures to prevent, contain, and respond to spills that discharge into the MS4. Report on the spill prevention and response activities, including the number of spills addressed.				
	<i>DEP Note: The permittee may report the number of hazardous material spills separately from the number of non-hazardous material spills, or report one combined number, to more accurately reflect its tracking of these spills.</i>				
	Hazardous and non-hazardous material spills responded to	1	Illicit Discharge Report	Public Works	
	During Year 1 of the permit, develop and implement a written plan for the training of all appropriate permittee personnel (including field crews, firefighters, fleet maintenance staff and inspectors) and contractors on proper spill prevention, containment, and response techniques and procedures. Refresher training shall be provided annually. Report the number and type of training activities, and the number of permittee personnel and contractors trained (both in-house and outside training).				
	<i>DEP Note: If "0" is reported for either reporting item, please include in Column F an explanation of why training was not provided to / obtained by personnel and contractors during the applicable reporting year; the most recent year that training was previously provided / obtained, and the names of the personnel and contractors previously trained.</i>				
	Personnel trained	3	0		No personnel sent for training this fiscal year.
	Contractors trained	0	27		Contractors were

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	maintenance of appropriate structural and non-structural erosion and sedimentation controls during construction to reduce the discharge of pollutants to the MS4. Report the number of permittee and private pre-construction site plans reviewed for stormwater, erosion, and sedimentation controls, and the number approved. <i>DEP Note: Please provide an explanation in Column F for any "0" reported in Column C.</i>				
	PERMITTEE SITES: Construction site plans reviewed	0	Approval Letter from Engineering Dept.	Engineering Dept.	No construction site plans reviewed
	PERMITTEE SITES: Construction site plans approved	0	Approval Letter from Engineering Dept.	Engineering Dept.	No construction site plans approved
	PRIVATE SITES: Construction site plans reviewed	8	Approval Letter from Engineering Dept.	Engineering Dept.	
	PRIVATE SITES: Construction site plans approved	8	Approval Letter from Engineering Dept.	Engineering Dept.	
	Annually review (and revise, as needed) and implement the permittee's written procedures to notify all new development / redevelopment permit applicants of the need to obtain all required stormwater permits. Report the number of new development/redevelopment permit applicants notified of the ERP and CGP, and the number of applicants who confirmed ERP and CGP coverage. <i>DEP Note: Please provide an explanation in Column F for any "0" reported in Column C. If the number of applicants notified of ERP or CGP coverage is less than the number of construction site plans reviewed, please provide an explanation for the discrepancy in Column F.</i>				
	Notified of ERP stormwater permit requirements	8	Approval Letter from Engineering Dept.	Engineering Dept.	
	Confirmed ERP coverage	6	Approval Letter from Engineering Dept.	Engineering Dept.	
	Notified of CGP stormwater permit requirements	8	Approval Letter from Engineering Dept.	Engineering Dept.	
	Confirmed CGP coverage	6	Approval Letter from Engineering Dept.	Engineering Dept.	
Part III.A.9.b	Construction Site Runoff — Inspection and Enforcement				
	As an attachment to the Year 1 Annual Report, the permittee shall submit a written plan that details the standard operating procedures for implementation of the stormwater, erosion and sedimentation inspection program for construction sites discharging stormwater to the MS4. The permittee shall implement the plan for inspecting construction sites <u>immediately upon written approval by the Department</u> . Prior to Department approval, the permittee shall continue to perform inspections in accordance with its previously developed construction site inspection procedures. Report on the inspection program for privately-operated and permittee-operated construction sites, including the number of active construction sites during the reporting year, the number of inspections of active construction sites, the percentage of active construction sites inspected, and the number and type of enforcement actions / referrals taken. <i>DEP Note: If "0" is reported in Column C for the number of inspections conducted, please provide an explanation in Column F of why no inspections were conducted. If the number of inspections reported is equal to or less than the number of active construction sites, or the percentage inspected is less than 100%, please provide an explanation in Column F. In addition, the permittee should re-word the "NOVs / warning letters / citations issued" reporting item to more accurately reflect its particular initial enforcement activity, if necessary.</i> <i>DEP Note: Refer to Part III.A.9.b of the permit for what must be included in the construction site inspection program plan. Please provide the title of the attached</i>				

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	<i>plan in Column D and the name of the entity who finalized the plan in Column E.</i>				
	PERMITTEE SITES: Active construction sites	0	Capital Improvement Project Files	Engineering Dept.	No active construction sites
	PERMITTEE SITES: Inspections of active construction sites for proper stormwater, erosion and sedimentation BMPs	0	Stormwater Pollution Prevention Plan Inspection Report; Stormwater Construction Site Inspection Report; Contractor's Daily Report	Contractor	No active construction sites
	PERMITTEE SITES: Percentage of active construction sites inspected	n/a	Capital Improvement Project Files	Engineering Dept.	No active construction sites
	PRIVATE SITES: Active construction sites	8	Development Files	Engineering Dept.	
	PRIVATE SITES: Inspections of active construction sites for proper stormwater, erosion and sedimentation BMPs	102	Pollution Prevention Plan Inspection Report	Contractor	
	PRIVATE SITES: Percentage of active construction sites inspected	75	Pollution Prevention Plan Inspection Report	Contractor	
	Notices of Violation (NOVs) / warning letters / citations Issued	0			No NOV's Issued
	Stop Work Orders Issued	0			No Stop Work Orders Issued
	Fines issued	0			No fines Issued
	Year 1 ONLY: Attach the written construction site inspection program plan				
Part III.A.9.c	Construction Site Runoff — Site Operator Training				
	<p>During Year 1 of the permit, develop and implement a written plan for stormwater training / outreach for construction site plan reviewers, site inspectors and site operators. Provide training for permittee personnel (employed by or under contract with the permittee) and private persons involved in the site plan review, inspection or construction of stormwater management, erosion, and sedimentation controls. All inspectors of construction sites shall be certified through the Florida Stormwater, Erosion, and Sedimentation Control Inspector Training program, or an equivalent program approved by the Department. Refresher training shall be provided annually. Report the number and type of training activities, the number of inspectors, site plan reviewers and site operators trained (both in-house and outside training), and the number of private persons trained by the permittee.</p> <p><i>DEP Note: If "0" is reported for any of these reporting items, please include in Column F an explanation of why training was not provided to / obtained by the permittee's staff and private persons during the applicable reporting year.</i></p> <p><i>DEP Note: The permittee should report only the number of staff and private construction site operators trained / certified during the applicable reporting year, and then note in Column F the number of staff who were previously trained / certified. Private site operator training can include pre-construction meetings.</i></p>				

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		Certification Training	Initial Training (non- certification)	Refresher Training			
	Permittee construction site inspectors	0		27		Pre-Construction Conference	Engineering Dept.
	Permittee construction site plan reviewers		0			Florida Stormwater Erosion and Sedimentation Control Inspector Training Program	Florida Stormwater Association
	Permittee construction site operators		0			Engineering Department	

SECTION VIII. EVALUATION OF THE STORMWATER MANAGEMENT PROGRAM (SWMP)

Permit Citation/ SWMP Element	SWMP EVALUATION <i>(This section must be completed)</i>
A.	Part II.A.1 Structural control inspection and maintenance
	Strengths: Inspections and maintenance are consistently performed at high percentages reducing the amount of pollutants being discharged.
	Weaknesses: None
	SWMP Revisions to address deficiencies:
	Part II.A.2 Significant redevelopment
	Strengths: Coordination with regulatory agencies is required on any and all redevelopment projects.
	Weaknesses: None
	SWMP Revisions to address deficiencies:
	Part II.A.3 Roadways
	Strengths: Our litter control program reduces discharged pollutants.
	Weaknesses: None
	SWMP Revisions to address deficiencies:
	Part II.A.4 Flood control
	Strengths: Proper flow and minimum blockages in the system during storm events are insured by continuous inspections, cleaning and maintenance of basins, pipes and outfalls.
	Weaknesses: None

Construction Site Inspection Plan and Inspection Form

Construction site inspections are conducted for land-disturbing projects which have the potential to discharge stormwater runoff into our MS4.

Timing

Construction site inspections are conducted:

- Before the start of construction, after the placement of temporary BMPs
- During construction (one or more inspections, based on the project's potential for discharge to our MS4)
- At the end of the construction

Site Priority

All construction sites are considered priority if they have the potential to discharge into water bodies or our MS4. Sites will be inspected with a frequency deemed appropriate during the site plan review process and with consideration to rainfall events. In addition, any sites where compliance is a concern, will be inspected more frequently.

Inspection Procedure for Village of Royal Palm Beach

Inspections are the responsibility of the Engineering Department and are conducted using the attached construction site inspection form. The intent of the inspection is to verify that BMPs are performing and to document the inspections. All completed inspection forms are delivered to and maintained by the VRPB Public Works Department.

Enforcement

Instances of non-compliance will be handled with successively more rigorous enforcement measures.

1. Notice of Violation
2. Stop work order
3. Fines

The Engineering Construction Coordinator will issue notices of violation or stop work orders as deemed necessary.

The VRPB Community Development department will be responsible for issuing fines.

Construction Site Inspection Form

Site: _____

Date of Inspection: _____

Address: _____

Lat/Long of discharge point: _____ Receiving water body: _____

Project owner: ☐ Private ☐ City of _____

YES NO N/A

- | | | | |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Erosion & Sedimentation Controls are installed as shown on plan. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Erosion is being controlled on site. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Sedimentation is being contained on site. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No indication of sedimentation leaving the site. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | SWPP & completed inspection forms are on site & available. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Copy of SFWMD or FDEP Permit (if applicable) is on-site. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Coverage under the GCP has been obtained. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Prior non-compliance issues have been addressed. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All other sources of pollution are being controlled. |

Comments:
