



Village of Royal Palm Beach, Florida

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

April 23, 2020

Mr. Stephen Cioccia
Environmental Specialist
NPDES Stormwater Program
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

RE: Palm Beach County Municipal Separate Storm Sewer System (MS4)
NPDES Permit No. FLS000018 (Cycle 4)
Response to Year 2 Annual Report Comments – Construction Site Inspectors and
Operators Training - Updated Procedure
Village of Royal Palm Beach

Dear Mr. Cioccia:

The following is our response to the general comments in audit report, conducted June 12, 2019, on the Year 2 (Cycle 4) Annual Report from the Village of Royal Palm Beach:

1. You requested the Village submit an updated procedure (SOP for Construction Site Inspectors and Operators Training) which shall identify how the permittee will ensure, through the procedure's implementation, the required annual training is achieved for their construction site E&S BMPs inspectors and plan reviewers during each reporting year. *Please find enclosed in Attachment 'A' a copy of the updated procedure (SOP for Construction Site Inspectors and Operators Training).*
2. You requested the Village submit a corrective action plan to ensure the Village conducts inspections for all active construction site(s) during the reporting period and retain the required documentation of the inspections. *Please find enclosed in Attachment "B" a copy of the updated Construction Site Inspection Plan. Additionally, we have included in Attachment 'B' a copy of the Construction Site Inspection Form, which will document construction site inspections and will be retained by the Village of Palm Beach Engineering Department.*

Fred Pinto
Mayor

Jeff Hmara
Vice Mayor

Selena Samios
Councilwoman

Jan Rodusky
Councilwoman

Richard Valuntas
Councilman

Raymond C. Liggins P. E.
Village Manager

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

Sincerely,

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

Cc: Mr. Raymond C. Liggins, P.E., Village Manager
Mr. Alan Wertepny, P.E., Mock Roos
File

Attachment 'A'

Joint Training Program

The Village of Royal Palm Beach requires an annual refresher training for the Village's construction site E&S BMPs inspectors and plan reviewers during each reporting year. Annual follow-up (or "refresher") training is required for those that have received the initial training. The three topics are:

- Identification & reporting procedures for a suspected illicit discharge or dumping in the MS4 for all appropriate Village personnel. (Part III.A.7.c)
- Spill prevention, containment & response procedures (including techniques for mitigating pollution from spills) for all appropriate Village personnel (Part III.A.7.d)
- Stormwater management and erosion and sedimentation control BMPs for construction sites for site plan reviewers, site operators, and site inspectors. Construction site inspectors must be certified through the Florida Stormwater, Erosion, and Sedimentation Control Inspector Training program, or equivalent. (Part III.A.9.c)

Training is the responsibility of the Engineering and Public Works Departments. All appropriate Village personnel will be scheduled to attend the applicable training by Department Head or designee. All attendance records will be stored in the employee personnel file

Attachment 'B'

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

Inspections of private sites are the responsibility of the Engineering department. A minimum of three inspections are conducted (pre, during and post) using the attached construction site inspection form. Inspection of Village projects are the responsibility of the Village contractor with Engineering Department monitoring and receiving copies of the required applicable inspection per Florida Department of Environmental Protection Construction Generic Permit. The intent of the inspection is to verify that BMPs are performing and to document the inspections. All completed inspection results are logged in the inspection database and stored in a central location to ensure complete annual reporting.

Enforcement

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

1. Notice of Violation
2. Stop work order

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

Construction Site Inspection Form

Site: _____

Date of Inspection: _____

Address / PCN: _____

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

Project owner: ☐ Private ☐ City of _____

YES NO N/A

☐ ☐ ☐ Erosion & Sedimentation Controls are installed as shown on plan.

☐ ☐ ☐ Erosion is being controlled on site.

☐ ☐ ☐ Sedimentation is being contained on site.

☐ ☐ ☐ No indication of sedimentation leaving the site.

☐ ☐ ☐ Coverage under the GCP has been obtained.

☐ ☐ ☐ Prior non-compliance issues have been addressed.

☐ ☐ ☐ All other sources of pollution are being controlled.

Comments:
