

Attachment I

Responses to Florida Department of Environmental Protection NPDES MS4 202 Cycle 4, Year 3 Audit

Town of Hypoluxo NPDES Stormwater Permitting Program

C4Y3 Audit: Town of Hypoluxo

SWMP Element SOPs Required to be Submitted for the Audit [where required by the MS4 permit]:

1. Part III.A.1 – Structural Controls and Stormwater Collection Systems Operation:

Response: Refer to Palm Beach County NPDES Website (pbco-npdes.org), Annual Reporting, C3Y2, Individual ARFs, Hypoluxo ARF, pages 40 and 41 (SOP Litter Control and Inspection of Swales, Catch Basins and Pipes) and pages 44 to 49 (NPDES MS4 Compliance Monthly Inspection Form).

2. Part III.A.3 – Roadways, Litter Control:

Response: See SOP referenced above. Individual property owners are responsible for removal of litter in swales. No curbing within MS4.

3. Part III.A.5 – Municipal Waste Treatment, Storage and Disposal Facilities:

Response: Not applicable.

4. Part III.A.6 – Pesticides, Herbicides and Fertilizer Application:

Response: Refer to Palm Beach County NPDES Website (pbco-npdes.org), Annual Reporting, C4Y2, Fertilizer Friendly Ordinance (Town of Hypoluxo Ordinance No. 195).

5. Part III.A.7.c – Inspection and Investigation of Suspected Illicit Discharges and/or Improper Disposal:

Response: Refer to Palm Beach County NPDES Website (pbco-npdes.org), Annual Reporting, C3Y2, Individual ARFs, Hypoluxo ARF, page 42 (Proactive Inspections of Illicit Discharges) and page 43 (Reactive Inspections of Illicit Discharges).

6. Part III.A.8 – Industrial and High-Risk Runoff Facilities:

Response: Not applicable.

7. Part III.A.9.a, b & c – Construction Site Runoff:

Response: Refer to Palm Beach County NPDES Website (pbco-npdes.org), Annual Reporting, C3Y2, Individual ARFs, Hypoluxo ARF, pages 38 and 39 (Construction Site Inspection Plan and Inspection Form).

Inspection Records/Documentation Required to be Submitted for the Audit (AR Section VII):

1. Part III.A.1 – Structural Controls and Stormwater Collection Systems Operation:

- A. Current map and inventory of all major outfalls:

Response: No major outfalls. For minor outfalls, refer to Palm Beach County NPDES Website (pbco-npdes.org), Annual Reporting, C4Y1, Individual ARFs, Hypoluxo ARF, pages 16 and 17.

- B. Structural Controls Required Inspection and Maintenance Activities:

Response: Refer to Attachment II, Drainage System Inspection Worksheet and Completed NPDES MS4 Compliance Monthly Inspection Forms for 2018-2019.

- C. Sample of documentation of completed structural control inspection performed during the reported period:

Response: Refer to Attachment II, Drainage System Inspection Worksheet and Completed NPDES MS4 Compliance Monthly Inspection Forms for 2018-2019.

2. Part III.A.2 – Areas of New Development and Significant Redevelopment:

- A. Submit a listing and description of new/redevelopment projects reviewed:

Response: Not applicable.

3. Part III.A.3 – Roadways:

- A. Permittee Litter Control, Frequency of litter collection:

Response: Not applicable. Individual property owners are responsible for removal of litter in swales. No curbing within MS4.

B. Equipment yards and maintenance shops:

Response: Not applicable.

4. Part III.A.4 – Flood Control Projects:

Response: Not applicable.

5. Part III.A.5 – Municipal Waste Treatment, Storage and Disposal Facilities Not Covered by an NPDES Stormwater Permit:

Response: Not applicable.

6. Part III.A.6 – Pesticides, Herbicides, and Fertilizer Application:

A. Submit documentation (FDACS licenses) for permittee personnel which are public applicators of pesticides/herbicides.

B. Submit documentation (GIBMP) training completion) for permittee personnel which are applicators of fertilizer.

C. Submit documentation (FDACS licenses) for permittee personnel which are certified/licensed applicators of fertilizer.

Response: No Town personnel perform these functions. License verification and proof of GI-BMP training for the Town's contractor is included in Attachment III.

7. Part III.A.7 – Illicit Discharges and Improper Disposal:

A. Submit a complete and current copy of legal authority to conduct inspection, 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; including the legal authority to take legal action to eliminate illicit discharges or connections:

Response: Refer to Palm Beach County NPDES Website (pbco-npdes.org), Annual Reporting, C3Y2, Individual ARFs, Hypoluxo ARF, pages 50 to 53 (Hypoluxo Stormwater Control Ordinance).

B. Submit a listing and description of all Proactive inspections performed during the reporting period to include: name of facility, location(s), dates of investigations, type of incident, findings (indication of illicit discharge, connection dumping), whether the incident was resolved/date resolved and type of enforcement action (if required):

Response: Refer to Attachment II, Drainage System Inspection Worksheet and Completed NPDES MS4 Compliance Monthly Inspection Forms for 2018-2019.

- C. Submit copies of a sample SOP checklist/standard form/ report for Proactive inspections performed during the reporting period:

Response: Refer to Palm Beach County NPDES Website (pbco-npdes.org), Annual Reporting, C3Y2, Individual ARFs, Hypoluxo ARF, pages 44 to 49 (Monthly Inspection Form) and Attachment III, Drainage System Inspection Worksheet and Completed NPDES MS4 Compliance Monthly Inspection Forms for 2018-2019.

- D. Above copies must include all inspections where illicit Discharges and/or improper Disposal was found or where enforcement action was taken:

Response: Not applicable.

- E. Submit a listing and description of all Reactive inspections performed during the reporting period to include: name of facility, locations(s), date(s) of investigation, type of incident, findings (indication of illicit discharge, connection dumping), whether incident was resolved/date resolved and type of enforcement action taken:

Response: Not applicable.

- F. Submit copies of a sample documentation of the Reactive inspections:

Response: Not applicable.

- G. Above copies must include all inspections where Illicit Discharge and/or Improper Disposal was found or where enforcement action was taken:

Response: Not applicable.

- H. Submit documentation (e.g. training attendance roster, training completion certificate, etc.) of the number of permittee personnel and contractors who identify and report conditions in the stormwater system that may indicate the presence of illicit discharges/connections/dumping of the MSF, trained with the reporting year (both in-house and outside training):

Response: Illicit Discharge Training provided through the MS4 Steering Committee. Refer to Palm Beach County NPDES Website (pbco-npdes.org), Group/Joint Activities – Training – Excal Video Training, Attendance Logs, March 20, 2019, Sign in Sheet, #31.

- I. Submit the agenda or description of content of the annual training for permittee and contractors who identify and report conditions of the stormwater system:

Response: Refer to Palm Beach County NPDES Website (pbco-npdes.org), Meetings and Minutes Archive, 2029, March 20.

- J. Submit documentation to verify the number of spills responded to during the reporting period:

Response: Not applicable.

- 8. Part III.A.8.a – Industrial and High-Risk Runoff, Identification and Priorities and Procedures for Inspections:

- A. Submit a list of HRFs reported in the AR:

Response: Not applicable.

- B. Submit documentation for the number of HRF inspections reported:

Response: Not applicable.

- 9. Part III.A.9.a. – Construction Site Runoff, Site Planning and Non-Structural and Structural BMP's:

- A. Submit a complete copy of the current local codes, land development regulations or other legal authority document(s) that require the use and maintenance of appropriate structural and non-structural erosion, sedimentation and waste controls during construction to reduce discharge of pollutants to the MS4:

Response: Refer to Palm Beach County NPDES Website ([pbco-
npdes.org](http://pbco-
npdes.org)), Annual Reporting, C3Y2, Individual ARFs, Hypoluxo ARF, page 37 (Development Review Procedures and Checklist), pages 38 and 39 (Construction Site Inspection Plan and Inspection Form), pages 54 to 56 (Ordinance No. 192 – adding development review requirements relating to stormwater permits and pollution controls).

- B. List of permittee site plan review approvals reported and private site plan and review approvals.

Response: Not applicable (no new development during permit year).

- C. Submit a description of the process to notify permit applicants of the need to obtain all required stormwater permits.

Response: Refer to Palm Beach County NPDES Website (pbco-
npdes.org), Annual Reporting, C3Y2, Individual ARFs, Hypoluxo ARF, page
37 (Development Review Procedures and Checklist), pages 38 and 39
(Construction Site Inspection Plan and Inspection Form).

- D. Submit a description of the proceed to confirm ERG and CGP coverage has been obtained, as applicable, prior to any land grading, excavation or clearing.

Response: Refer to Palm Beach County NPDES Website (pbco-
npdes.org), Annual Reporting, C3Y2, Individual ARFs, Hypoluxo ARF, page
37 (Development Review Procedures and Checklist), pages 38 and 39
(Construction Site Inspection Plan and Inspection Form).

10. Part III.A.9.b – Construction Site Runoff, Inspection and Enforcement.

- A. “PERMITTEE” active construction sites reported in AR.

Response: Not applicable.

- B. “PRIVATE” active construction sites reported in AR.

Response: Not applicable.

11. Part III.A.9.c – Construction Site Runoff, Site Operator Training:

- A. Submit documentation of E&SC construction site inspector qualification/certification for the permittee’s construction site inspectors identified in the AR:

Response: The Town contracts with Hy-Byrd Incorporated for Building Department services. Mike Crisafulle, principal of Hy-Byrd, completed such training in 2013; however, the Town has been unable to locate the certificate.

- B. Submit documentation of annual training:

Response: Refer to Palm Beach County NPDES Website (pbco-
npdes.org), Group/Joint Activities – Training – Excal Video Training,
Attendance Logs, March 20, 2019, Sign in Sheet, #31.