

Attachment 1  
Town of Palm Beach MS4s Remote Audit Submittal  
Requirements Audit Document Submittal June 2020

The permittees receiving this email, which will be participating in a remote MS4 audit, are required to submit to S. Cioccia in electronic format the following MS4 SWMP related documents/records/documentation.

**The below audit documents/records/documentation are required to be submitted in electronic format by 6/26/2020. The submittals are required to be sent by email to Alan Wertepny; also, the permittee must copy S. Cioccia @ DEP on their submittal email,** notifying the DEP MS4 coordinator of audit documents submittal.

Alan will ensure the submittals will be archived on the PB Co. MS4 web site (*pbco-npdes.org*) for future access.

The enclosed supplement 'Preparing Records for MS4 Audit' is provided as a guide for acceptable/adequate audit submissions.

**The following guides are required for the organization and submittal of the SWMP documents/records/documentation required for the audit:**

1. For all audit email/correspondence/submittals, Format the 'Subject' line as follows:  
*Permittee name, Content of submittal, C4Y3 Audit [e.g. Delray Beach, Part III.A.1 SOPs & Inspections, C4Y3 Audit].*
2. Name and organize all SWMP documents/records/documentation submittal (except for combined SOP documents) according to the Annual Report's structure and per the following: **'Inspection Records/Documentation Required to be Submitted'** (beginning with Section VII, Part III.A.1 through Part III.A.9.c of the MS4 Annual Report (AR)) *[e.g. Delray Beach, Part III.A.1 SOPs & Inspections, C4Y3 Audit].*

**DONE** **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.
2. Part III.A.3 - Roadways, Litter Control.
3. Part III.A.5 Municipal Waste Treatment, Storage, and Disposal *Facilities [If reporting >0 Facilities in AR].*
4. Part III.A.6 - Pesticides, Herbicides, and Fertilizer Application.
5. Part III.A.7.c - Inspection and Investigation of Suspected Illicit Discharges and/or Improper Disposal (Incl. SOP for Training).
6. Part III.A.8 - Industrial and High Risk Runoff *[If reporting > 0 HRF in AR].*
7. Part III.A.9.a, b & c - Construction Site Runoff.

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

- DONE** 1. Part III.A.1 - Structural Controls and Stormwater Collection Systems Operation:  
**DONE** A. Current map and inventory of all major outfalls *[exempted if reporting 0 outfall in AR];*

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*or if current map and inventory is located on the pbco-npdes.org web site location – permittee MUST submit confirmation statement indicating current map and inventory are located on the pbco-npdes.org site. Must incl. in statement the ID of the document location: 'Report Archive' location (e.g. Cycle 4, Year 1 (2016-2017)), document name (e.g. Individual Annual Report Forms, Del Ray Beach) and document pages (e.g. pgs. 2 - 3);* [See folder named Stormed Water Inventory Documentation Part A.1](#)

DONE

Structural Controls Required Inspection and Maintenance Activities, Submit the following:

DONE

i. Printouts from electronic databases or tracking spreadsheets that Submit the total number of inspection and maintenance activities identified for each structural control reported in the AR (incl. units, e.g. number, miles, feet, etc.); OR [See folders Inspection Records and Maintenance Records.](#)

ii. Listing of total number of inspection and maintenance activities for each structural control reported in the AR (incl. units, e.g. number, miles, feet, etc.); [This is what was reported in the ARF.](#)

DONE

iii. If any number reported in the AR is an estimate, then a written description or handwritten calculations showing how the number was derived; and [See electronic folder for this item.](#)

iv. **Permittee shall demonstrate the inspection and/or maintenance records total to the number as reported in the Annual Report which is the subject of the audit.** [There is no required document for this item.](#)

DONE

B. Submit a sample of the documentation of completed structural control inspections performed during the reporting period for the following controls [*where number reported > 0 in AR*]:

DONE

i. **Major outfalls**: [*min. of 100% of total number of inspections reported, where # reported in AR < 10; min. of 70% of total number of inspections reported, where # reported in AR < 30; min. of 50% of total number of inspections reported, where # reported in AR > 30*];

ii. **Canals** [*min. of 100% of total number of inspections reported*]; [N/A](#)

iii. **Pollution Control Boxes** [*min. of 50% of total number of inspections reported*]; [N/A](#)

DONE

iv. **Pump Stations** [*min. of 50% of total number of inspections reported*];

DONE

v. **Exfiltration trench** [*min. of 50% of total number of inspections reported*];

[ARF in error. 0 this reporting period.](#)

vi. **Dry/Wet retention/detention systems** [*min. of 50% of total number of inspections reports*]; [N/A](#)

DONE

vii. **Pipes/culverts** [*min. of 100% of total number of inspections reported*].

DONE

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

A. Submit a listing & description of new/redevelopment projects reviewed [*where number reported in AR > 0*].

DONE

3. Part III.A.3 – Roadways: [See folder for this item.](#)

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A. Permittee Litter Control, Frequency of litter collection:

- DONE i. Submit documentation/logs of litter collection performed during the reporting period (incl. date performed);
- DONE ii. Submit documentation/logs of street sweeping performed during the reporting period (incl. date performed).

B. Equipment yards and maintenances shops [*where number of facilities reported in AR > 0*]:

- DONE i. Submit documentation (checklist/inspection report) for each inspection conducted for each facility reported. NEEDS IMPROVEMENT refer to Town's response at end of this attachment.

DONE 4. Part III.A.4 – Flood Control Projects [*where number reported in AR > 0*]:

- A. Submit a listing & description of Flood control projects completed during the reporting period [*where number reported in AR > 0*]. None

DONE 5. Part III.A.5 – Municipal Waste Treatment, Storage, and Disposal Facilities Not Covered by an NPDES Stormwater Permit [*where number of facilities reported in AR > 0*]:

- DONE A. Submit documentation (checklist/inspection report) for each inspection conducted for each facility reported.

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

- DONE A. Submit documentation (FDACS licenses) for permittee personnel which are public applicators of pesticides/herbicides [*where number reported in AR > 0*];
- DONE B. Submit documentation (GIBMP training completion) for permittee personnel which are applicators of fertilizer [*where number reported in AR > 0*];
- DONE C. Submit documentation (FDACS licenses) for permittee personnel which are certified / licensed applicators of fertilizer [*where number reported in AR > 0*];
- DONE D. If the permittee operates one or more golf courses, confirm the courses are operated in a manner that is consistent with the [Best Management Practices for the Enhancement of Environmental Quality on Florida Golf Courses](#) manual and Submit the responsible operator's contact information.

7. Part III.A.7. - Illicit Discharges and Improper Disposal

- A. Inspections, Ordinances and Enforcement Measures: There is no required document for this item.
- DONE C. Submit a complete copy of the current 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; including the legal authority to take legal action to eliminate illicit discharges or connections, where applicable [*exempted where MS4 permit does not contain this requirement or if legal authority meets the above requirements and is located on the pbco-npdes.org web site; permittee MUST submit confirmation statement indicating the complete and current legal authority is available on the pbco-npdes.org site. Must incl. in statement the ID of the document location: 'Report*

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Archive' location (e.g. Cycle ?, Year ? (?-?)), document name (e.g. Legal Authority Ordinances or Individual Annual Report Forms) and document pages (e.g. pgs. 2 - 3)];

DONE

D. Inspection and Investigation of Suspected Illicit Discharges and/or Improper Disposal:

DONE

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

DONE

ii. Submit copies of a sample of the SOP checklists/standard form/report for Proactive inspections performed during the reporting period: **min. of 100% of total number of inspections reported if # reported in AR < 25; min. of 70% of total number of inspections reported if # reported in AR < 80; min. of 50% of total number of inspections reported if # reported in AR < 200; min. of 20% of total number of inspections reported if # reported in AR < 500; min. of 10% of total number of inspections reported if # reported in AR > 500**];

Needs Improvement. Refer to Town's response at end of this document.

iii. Above copies in (ii) must include all inspections where Illicit Discharges and/or Improper Disposal was found or where enforcement action was taken;

iv. Submit a listing & description of all Reactive inspections performed during the reporting period, to include: name of facility, location(s), date(s) of investigation(s), type of incident, findings (indication of illicit discharge, connection, dumping), whether incident was resolved/date resolved and type of enforcement action taken (if required) [*where number reported in AR > 0*]; **None**

v. Submit copies of a sample of the documentation of the Reactive inspections performed during the reporting period: **min. of 100% of total number of inspections reported if # reported in AR < 25; min. of 70% of total number of inspections reported if # reported in AR < 80; min. of 50% of total number of inspections reported if # reported in AR < 200; min. of 20% of total number of inspections reported if # reported in AR < 500; min. of 10% of total number of inspections reported if # reported in AR > 500**]; **None**

vi. Above copies in (v) must include all inspections where Illicit Discharges and/or Improper Disposal was found or where enforcement action was taken; **N/A**

DONE

vii. 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 to the MS4, trained within the reporting year (both in-house and outside training);

DONE

viii. Submit the agenda or description of content of the annual training for permittee personnel and contractors who identify and report conditions in the stormwater system [*may reference if contained in this SWMP element's current written SOP*].

DONE

E. Illicit Discharges and Improper Disposal - Spill Prevention and Response:

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**DONE** i. Submit documentation to verify the number of spills responded to during the reporting period [*where number reported in AR > 0*].

**DONE** 8. Part III.A.8.a - Industrial and High-Risk Runoff, Identification of Priorities and Procedures for Inspections [*where number reported in AR > 0*]: [Inventory completed in 2020 permit year for inspection in 2020](#)

**DONE** A. Submit a list of HRF facilities reported in the AR;

B. Submit documentation for the number of HRF facility inspections reported. [ARF error 6 sites](#)

Part III.A.8.b - Industrial and High-Risk Runoff, Monitoring for High Risk Industries [*where number reported in AR > 0*]:

**DONE** A. Submit documentation for the number of HRF facility sampled (include facility name, location, date sampled and pollutants detected). [None](#)

**DONE** 9. Part III.A.9.a - Construction Site Runoff, Site Planning and Non-Structural and Structural BMPs:

**DONE** 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 the discharge of pollutants to the MS4 [*exempted where MS4 permit does not contain this requirement or if legal authority meets the above requirements and is located on the pbco-npdes.org web site; permittee MUST submit confirmation statement indicating the complete and current legal authority is located at the following pbco-npdes.org web site location: 'Report Archive' location (e.g. Cycle ?, Year ? (?-?)), document name (e.g. Legal Authority Ordinances or Individual Annual Report Forms) and document pages (e.g. pgs. 2 - 3)*];

**DONE** B. Submit a list of 1) permittee site plan review approvals reported and 2) private site plan review approvals reported Industries.

**DONE** C. Submit a description of the process to notify permit applicants of the need to obtain all required stormwater permits; [Refer to Building Permit Application](#)

**DONE** D. Submit a description of the process to confirm that ERP and CGP coverage has been obtained, as applicable, prior to commencement of any land grading, excavation, or clearing; [Building Permit Application - Stormwater Management Section](#)

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

**DONE** A. 'PERMITTEE' active construction sites reported in AR [*where number reported in AR > 0*]:

**DONE** i. Submit a list of all permittee active construction site(s) reported (to include: facility/project name, type of site [e.g. roadway, structure, MS4 BMP, etc.], area proposed to be disturbed (in acres); total number of E&SC inspections conducted for each permittee site during reporting period, CGP & ERP permit number [if permit required] and **total number of E&SC inspections conducted for all permittee active construction site(s) during reporting period**; [None](#)

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- DONE** ii. Submit copies of a sample of the documentation of the permittee active construction site inspections performed during the reporting period: [**min. of 100% of total number of inspections reported if # reported in AR < 25; min. of 70% of total number of inspections reported if # reported in AR < 80; min. of 50% of total number of inspections reported if # reported in AR < 200; min. of 20% of total number of inspections reported if # reported in AR < 500; min. of 10% of total number of inspections reported if # reported in AR > 500**]; **None**
- iii. Above copies in (ii) **must include 1)** construction inspection(s) conducted during the three required phases of activity [pre, during or post construction], where phases of activity occurred during reporting period and **2)** all inspections where enforcement action was taken **There is no required document for this item.**
- DONE** iv. Submit copies of all written enforcement actions reported in the AR (e.g. Notices of Violation, Stop Work Orders, fines, etc.). **None**

B. 'PRIVATE' active construction sites reported in AR [*where number reported in AR > 0*]:

- DONE** i. Submit a list of all private active construction site(s) reported (to include: facility/project name, type of site [e.g. roadway, structure, MS4 BMP, etc.], area proposed to be disturbed (in acres); total number of E&SC inspections conducted for each private site during reporting period, CGP & ERP permit number [if permit required] and **total number of E&SC inspections conducted for all private active construction site(s) during reporting period**;
- DONE** ii. Submit copies of a sample of the documentation of the private active construction site inspections performed during the reporting period: [**min. of 100% of total number of inspections reported if # reported in AR < 25; min. of 70% of total number of inspections reported if # reported in AR < 80; min. of 50% of total number of inspections reported if # reported in AR < 200; min. of 20% of total number of inspections reported if # reported in AR < 500; min. of 10% of total number of inspections reported if # reported in AR > 500**];
- iii. Above copies in (ii) **must include 1)** construction inspection(s) conducted during the three required phases of activity [pre, during or post construction], where phases of activity occurred during reporting period and **2)** all inspections where enforcement action was taken **There is no required document for this item.**
- DONE** iv. Submit copies of all written enforcement actions reported in the AR (e.g. Notices of Violation, Stop Work Orders, fines, etc.). **None**

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

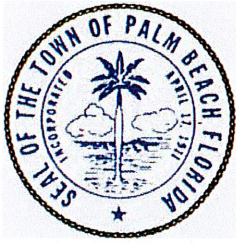
- DONE** A. Submit documentation of E&SC construction site inspector qualification/certification for the permittee's construction site inspectors identified in the AR (e.g. DEP E&SC course completion certificate, private DEP E&SC course completion certificate, etc.);
- DONE** B. Submit documentation of annual training (e.g. training attendance roster, training completion certificate, etc.) received by permittee E&SC construction site inspector(s), construction site plan reviewers and construction site operators (both

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DONE

in-house and outside training);

- C. Submit the agenda or description of content of the annual training for permittee E&SC construction site inspector(s), construction site plan reviewers and construction site operators *[may reference if contained in this SWMP element's current written SOP]*.



# TOWN OF PALM BEACH

Public Works Department

July 23, 2020

Mr. Stephen Cioccia, MS4 Coordinator  
NPDES Stormwater Program  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 3585  
Tallahassee, FL 32399-2400

**RE: MS4 NPDES Permit Compliance Audit, Town of Palm Beach**

Dear Mr. Cioccia,

In preparing the requested documentation for the upcoming MS4 NPDES Permit Compliance Audit, the Town of Palm Beach staff identified inefficiencies in its documentation of the programs carried out by staff to ensure the intention of the MS4 NPDES permit is met (to protect the MS4 receiving water body). As soon as the staff became aware of this, the Town engaged Mock Roos & Associates, Inc. to assist in preparing for the Cycle 4 Year 3 Audit. There has been significant unexpected turnover in the staff that was assigned management responsibilities for this program for the Town. With this sudden turnover, the Town lost significant institutional knowledge of, and familiarity with, what is required for the permit compliance documentation. While the programs have continued, the documentation aspect has faltered. Nonetheless, the Town has tried to provide as much documentation as possible to demonstrate that the required activities were performed.

The Town is taking proactive measures to ensure that the SOPs are once again up to date and accurately reflect the Town's permit programs and procedures, and that the necessary compliance documentation is being completed and stored appropriately by engaging Mock Roos & Associates, Inc. to assist the Town in creating a structured data collection and reporting process. The Town is committed to addressing these documentation issues immediately to avoid any future deficiencies.

If you need additional information, please do not hesitate to contact me.

Sincerely,

Patricia  
Strayer

Digitally signed by Patricia  
Strayer  
Date: 2020.07.23  
11:25:36 -04'00'

Patricia K. Strayer, P.E.  
Town Engineer

PKS  
Attachments

cc: H. Paul Brazil, P.E., Director of Public Works  
Eric Brown, P.E., Assistant Director of Public Works  
Brett Madison, Water Resources Division Manager  
Chester Purves, Services Division Manager  
Rob Weber, Coastal Program Manager  
Alan Wertepny, P.E., Mock Roos & Associates, Inc.  
Garry Gruber P.E., Mock Roos & Associates, Inc.  
Public Works File