

***'Responses'***  
**to the**  
**Florida Department of Environmental Protection (FDEP)**  
**NPDES MS4 2020 Cycle 4 Year 3**  
**Audit of the**  
**South Indian River Water Control District**  
**NPDES MS4 Permitting Program**

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**C4Y3 Audit:** South Indian River Water Control District (SIRWCD)

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

1. Part III.A.1 - Structural Controls & Stormwater Collection Systems Operation-  
***Response:*** Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, SIRWCD ARF, pages 22-32 of 39
  
2. Part III.A.3 - Roadways, Litter Control- ***Response:*** Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, SIRWCD ARF, page 33 of 39.  
**SIRWCD Maintenance Shop – See Attachment 1 for the Maintenance Yard Inspection checklist.**
  
3. Part III.A.5 Municipal Waste Treatment, Storage, and Disposal Facilities – ***Response:*** SIRWCD has one dumpster in the maintenance yard which is inspected annually as part of the Maintenance Yard Inspection. The lid to the dumpster is kept closed.
  
4. Part III.A.6 - Pesticides, Herbicides, and Fertilizer Application- ***Response:*** Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, SIRWCD ARF, page 38 of 39.
  
5. Part III.A.7.c - Inspection and Investigation of Suspected Illicit Discharges and/or Improper Disposal (Incl. SOP for Training)-***Response:*** Refer to Attachment 2 for Proactive Inspection Program and Illicit Investigation Procedures;

6. Part III.A.8 – Industrial and High-Risk Runoff Facilities – **Response:** NA
7. Part III.A.9.a, b & c - Construction Site Runoff- **Response:** Refer to Attachment 3 for Construction Site Inspection Plan; and on the pbco-npdes.org website Joint Training Program March 20, 2019 sign-in sheet (#25, Karen Brandon, AECOM).

**Inspection Records/Documentation Required to be Submitted for the C4Y3 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:** The current map and inventory are located on the pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, SIRWCD ARF, page 39 of 39.
- B. Documentation of completed structural control inspections and maintenance activities performed during the reporting period. **Response to B. i and ii:** Refer to pbco-npdes.org website, Annual Reporting, C4Y3, Individual ARFs, SIRWCD ARF, page 4 of 35; and the SIRWCD October 1, 2018 to September 30, 2019 example Inspection Form and Log Summary included in Attachment 4.  
**Response to B iii:** Not Applicable (no estimates; all represent ‘actual’ inspection and maintenance activities). **Response to B iv:** Refer to pbco-npdes.org website, Annual Reporting, C4Y3, Individual ARFs, SIRWCD ARF, page 5 of 35.
- C. Samples of documentation of completed structural control inspections performed during the reporting year. **Response:** Refer to Attachment 3 sample form and Summary Log Part III.A.1 for all structural controls in SIRWCD.

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

- A. Submit a listing and description of the projects of new/redevelopment projects reviewed. **Response:** N/A

**3. Part III.A.3 – Roadways: Litter Control, Street sweeping, Equipment Yards, and Maintenance:**

- i. Submit documentation/logs of litter collection performed during the reporting year. **Response:** Refer to Attachment 5 FY 18/19 Summary Log and attached Solid Waste Authority truck tickets.
- ii. Submit documentation/logs of street sweeping performed during the reporting year. **Response:** NA

**4. Part III.A.4 – Flood Control Projects:** Submit a listing & description of Flood

control projects completed during the reporting period. **Response:** NA.

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

- A. Submit documentation (checklist/inspection report) for each inspection conducted for each facility reported. **Response:** One inspection annually of dumpster as part of Maintenance Yard inspections; Lids are kept closed.

6.

**Part III.A.6 – Pesticides, Herbicides, and Fertilizer Application: Copies of applicable FDACS licenses for permittee personnel which are public applicators of pesticides/ herbicides**

- A. Documentation (FDACS licenses) for permittee personnel which are public applicators of pesticides/herbicides. **Response:** Refer to Attachment 6 for the license which applies to pesticide and herbicide application.
- B. Submit documentation (GIBMP) for permittee personnel which are applicators of fertilizer. **Response:** NA
- C. Submit documentation (FDACS licenses) for permittee personnel which are certified/licensed applicators of fertilizer. **Response:** N A
- D. If the permittee operates one or more golf courses, confirm the courses are operated in a manner that is consistent with the appropriate manual and submit the responsible operator's contact information. **Response:** NA.

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

- a. Submit a complete and current copy of 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. **Response:** The SIRWCD, as a Chapter 298 water control district, does not have legal authority to conduct inspections, control illicit discharges, illegal dumping and spills into the MS4.
- 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 incident was resolved/date resolved and type of enforcement action taken). **Response:** Refer to FY 18/19 Illicit Discharge Inspection Log in Attachment 7.

- c. Submit copies of a sample of the SOP checklist/standard form/report for Proactive inspections performed during the reporting period. **Response: See Attachment 2.**
  - d. Above copies in c. must include all inspections where illicit Discharges and/or improper Disposal was found or where enforcement action was taken. **Response: NA.**
  - e. 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 taken. **Response: NA.**
  - f. Submit copies of a sample of documentation of the Reactive inspections. **Response: NA.**
  - g. Above copies in f. must include all inspections where Illicit Discharges and/or Improper Disposal was found or where enforcement action was taken. **Response: NA.**
  - 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 MS4, trained within the reporting year (both in-house and outside training) Response: Illicit Discharge Training for 13 SIRWCD staff provided by viewing the “Illicit Discharge Detection and Elimination” Video by the Center for Watershed Protection and Robert Pitt, University of Alabama, October 2013. Sign-in Sheet for the Sept. 25, 2019 training is provided in Attachment8.**
  - i. Submit the agenda or description of content of the annual training for permittee and contractors who identify and report conditions in the stormwater system. **Response: The agenda includes: Types of Illicit Discharges, Spotting Illicit Discharges and What you can do.**
  - j. Submit documentation to verify the number of spills responded to during the reporting. **Response: NA**
8. **Part III.A.8.a. - Industrial and High-Risk Runoff, Identification of Priorities and Procedures for Inspections.**
- A. Submit a list of HRF reported in the AR. **Response: NA**
  - B. Submit documentation for the number of HRF inspections reported. **Response: NA.**

**Part III.A.8.b – Industrial High-Risk Monitoring for High-Risk Industries.**

A. Submit documentation for the number of HRF sampled. **Response:** NA

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

- 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. **Response:** 1) N/A
- b. A list of 1) permittee site plan review approvals reported and 2) private site plan review approvals. **Response:** N/A
- c. Submit a description of the process to notify permit applicants of the need to obtain all required stormwater permits. **Response:** Please see Attachment 9 for the SIRWCD Permit Review guidelines which include notifying the applicant if they meet thresholds for SFWMD ERP or FDEP CGP permits.
- d. Submit a description of the process to confirm ERP and CGP coverage has been obtained, as applicable, prior to commencement of any land grading, excavation or clearing. **Response:** Please see Attachment 9 for the SIRWCD Permit Review guidelines which include notifying the applicant if they meet thresholds for SFWMD ERP or FDEP CGP permits.

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

- a. 'PERMITTEE' active construction sites reported in AR. **Response:** Refer to pbco-npdes.org website, Annual Reporting, C4Y3, Individual ARFs, SIRWCD ARF, page 12 of 35 and Field Reports in Attachment 10
- b. 'PRIVATE' active construction sites reported in AR. **Response:** Refer to pbco-npdes.org website, Annual Reporting, C4Y3, Individual ARFs, SIRWCD ARF, page 12 of 35 and Field Reports in Attachment 11.

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:** AECOM staff Amy Eason, Karen Brandon, Craig Ford and Peter May are certified E&SC Inspectors.

Three (3) SIRWCD staff are also Certified Inspectors – Mike Dillon, Arie Raz, and George McGarry. They all were certified prior to the Annual Report Year 18/19.

**Stormwater Management Inspection Certification**

b. Submit documentation of annual training. ***Response:*** Refer to [pbco-npdes.org](http://pbco-npdes.org) website, Group/Joint Activities, Training, Excal Visual Video Training, Attendance logs, March 20, 2019, Sign-In-Sheet, Karen Brandon (AECOM).