



April 19, 2012  
VIA EMAIL

Mr. Ken Kuhl  
NPDES Stormwater Section  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
Email: [Kenneth.Kuhl@dep.state.fl.us](mailto:Kenneth.Kuhl@dep.state.fl.us)

***Palm Beach County Municipal Separate Storm Sewer System (MS4)  
NPDES Permit No. FLS000018 (Cycle 3)  
Year 1 Annual Report Comments  
Town of Gulf Stream***

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Dear Mr. Kuhl,

Please accept this letter in response to your comments dated April 12, 2012 with regards to the Town of Gulf Stream as follows:

Comment:

- 1) Section VII, Part III.A.7.c of the Annual Report form, in reference to illicit discharge training, requires the permittee to report the name of the Document or Record in "Column D" and the Entity Performing the Activity in "Column E" of the Annual Report form. Provide the information required in Column D and E for this section of the Annual Report.

Response:

*The information regarding the initial training performed was added to Column D and Column E as requested. The revised template pages 11 through 22 are attached with this specific revision on page 11 of 22.*

Comment:

- 2) Section VII, Part III.A.9.a of the Annual Report form requires the permittee to report the site-plan applicants which were notified and confirmed in regards to CGP and ERP requirements. The permittee reported "0" for CGP and ERP confirmations with a comment that approved projects did not exceed minimum thresholds for an ERP. Explain why a CGP for the one approved project was not confirmed since different thresholds apply to CGP than to ERP.

Response:

*During the reporting period, only one project, 1220 N. Ocean, was sufficient in scope to meet the notification requirements. The Town of Gulf Stream notified the owner of possible ERP and CGP permitting requirements at the site plan approval stage. The next step in the Town's review procedures is for the owner to submit to the City of Delray Beach for engineering review and approval of the construction plans. Plan review and approval and the construction site inspection services have been contracted by the Town of Gulf Stream to the City of Delray Beach. By the end of this reporting period, the plans had not yet been submitted to the City and therefore no notification of ERP or CGP requirements were made. The project has subsequently been submitted, reviewed, approved and the City's Construction Inspection Department has been conducting site inspections as required. Refer to the attached revised template pages 15-16 of 22 for the expanded comment in Column F.*

We hope this addresses your comments. If you have any further questions, please contact me.

Sincerely,

**MATHEWS CONSULTING, INC.**



Rebecca Travis, P.E.  
Principal

*Attachment*

Cc: Mr. Eric Livingston – FDEP, [Eric.Livingston@dep.state.fl.us](mailto:Eric.Livingston@dep.state.fl.us)  
Mr. William Thrasher – Town of Gulf Stream, [bthrasher@gulf-stream.org](mailto:bthrasher@gulf-stream.org)  
Mr. Randal Krejcarek – City of Delray Beach [Krejcarek@ci.delray-beach.fl.us](mailto:Krejcarek@ci.delray-beach.fl.us)  
Mr. Alan Wertepny – Mock Roos & Assoc., [alan.wertepny@mockroos.com](mailto:alan.wertepny@mockroos.com)  
MC File #1623

**SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE**

A.	B.		C.	D.	E.	F.
Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity		Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments
	<p>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) <u>and contractors</u> to identify and report conditions in the stormwater facilities that may indicate the presence of illicit discharges / connections / dumping to the MS4. Follow-up 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).</p> <p><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></p>					
		<b>Initial Training</b>	<b>Refresher Training</b>			
	<b>Personnel trained</b>	2	0		Attendance List	Program Presented by Steering Committee Video training received during prior reporting periods. Training dates 3/17/10 and 3/18/09
	<b>Contractors trained</b>	0	N/A		N/A	N/A
<b>Part III.A.7.d</b>	<b>Illicit Discharges and Improper Disposal — Spill Prevention and Response</b>					
	<p>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.</p> <p><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></p>					
	<b>Hazardous and non-hazardous material spills referred to Delray Beach</b>	0	N/A	N/A	N/A	No spills
	<p>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) <u>and contractors</u> on proper spill prevention, containment, and response techniques and procedures. Follow-up 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).</p> <p><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></p>					
		<b>Initial Training</b>	<b>Refresher Training</b>			
	<b>Personnel trained</b>	3	2		3/16/11 sign in sheet, B. Dietrick, R. Travis	Steering Committee Spills & Skills, Storm Warnings
	<b>Contractors trained</b>	0	N/A		N/A	Utilize trained in-house staff or City of Delray Beach Fire Dept
<b>Part</b>	<b>Illicit Discharges and Improper Disposal — Public Reporting</b>					

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III.A.7.e					
	<p>During Year 1 of the permit, develop and implement a written public education and outreach program plan to promote, publicize, and facilitate public reporting of the presence of illicit discharges and improper disposal of materials into the MS4. Report on the public education and outreach activities that are performed or sponsored by the permittee within the permittee’s jurisdiction to encourage the public reporting of suspected illicit discharges and improper disposal of materials, 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).</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: All the co-permittees may refer to the PBC Joint AR in place of reporting individual items as demonstrated in the first line below. The co-permittees may remove all the other reporting items except the first one if they include reference to the PBC Joint AR. However, a permittee can choose to also report any outreach activities it performs in addition to the joint effort – in such a case, please keep the reporting items that are applicable.</i></p>				
Part III.A.7.f	<p><b>Public education and outreach program</b></p> <p><b>Illicit Discharges and Improper Disposal — Oils, Toxics, and Household Hazardous Waste Control</b></p>				
	<p>During Year 1 of the permit, develop and implement a written public education and outreach program plan to encourage the proper use and disposal of used motor vehicle fluids, leftover hazardous household products, and lead acid batteries. Report on the public education and outreach activities that are performed or sponsored by the permittee within the permittee’s jurisdiction to encourage the proper use and disposal of oils, toxics, and household hazardous waste, including the type and number of activities conducted, the type and number of materials distributed, the amount of waste collected / recycled / properly disposed, the percentage of the population reached by the activities in total, and the number of Web site visits (if applicable).</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: All the co-permittees may refer to the PBC Joint AR in place of reporting individual items as demonstrated in the first line below. The co-permittees may remove all the other reporting items if they include reference to the PBC Joint AR. However, a permittee can choose to also report any outreach activities it performs in addition to the joint effort – in such a case, please keep the reporting items that are applicable.</i></p>				
Part III.A.7.g	<p><b>Public education and outreach program</b></p> <p><b>Illicit Discharges and Improper Disposal — Limitation of Sanitary Sewer Seepage</b></p>				

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	<p>Annually review (and revise, as needed) and implement the permittee's written procedures to reduce or eliminate <u>sanitary wastewater contamination into the MS4</u>, including discharges to the MS4 from sanitary sewer overflows (SSOs) and from inflow / infiltration from collection / transmission systems and/or septic tank systems. Advise the appropriate utility owner of a violation if constituents common to wastewater contamination are discovered in the MS4. Report on the type and number of activities undertaken to reduce or eliminate SSOs and inflow/ infiltration, the number of SSOs or inflow / infiltration incidents found and the number resolved, and the name of the owner of the sanitary sewer system within the permittee's jurisdiction.</p> <p><i>DEP Note: The permittee needs to "customize" this section as it pertains to the type of activities undertaken to reduce or eliminate SSOs and inflow / infiltration into the MS4. The first three reporting items below are <u>examples</u>.</i></p> <p><i>DEP Note: The permittee should contact the appropriate authorities for accurate reporting information, such as the sanitary sewer system operator who is responsible for investigating and eliminating SSOs and the local health department who is responsible for permitting / overseeing septic tank systems.</i></p> <p><i>DEP Note: Report only the SSOs and inflow / infiltration incidents <u>into the MS4</u>.</i></p>				
	<p><b>Activity to reduce/eliminate SSOs and inflow / infiltration: Repair / lining of sanitary sewer system</b></p>	0	N/A	N/A	Town does not own or maintain a sanitary sewer system
	<p><b>Activity to reduce/eliminate SSOs and inflow / infiltration: Septic systems removed</b></p>	0	N/A	N/A	Town does not own or maintain a sanitary sewer system
	<p><b>Activity to reduce/eliminate SSOs and inflow / infiltration: Emergency generator added</b></p>	0	N/A	N/A	Town does not own or maintain a sanitary sewer system
	<p><b>SSO incidents discovered</b></p>	0	N/A	N/A	No incidents discovered
	<p><b>SSO incidents resolved</b></p>	0	N/A	N/A	No incidents discovered
	<p><b>Inflow / infiltration incidents discovered</b></p>	0	N/A	N/A	No incidents discovered
	<p><b>Inflow / infiltration incidents resolved</b></p>	0	N/A	N/A	No incidents discovered
	<p><b>Name of owner of the sanitary sewer system</b></p>	Private owners or private septic tank systems			
<p><b>Part III.A.8.a</b></p>	<p><b>Industrial and High-Risk Runoff — Identification of Priorities and Procedures for Inspections</b></p>				
	<p>Continue to maintain an up-to-date inventory of all existing high risk facilities discharging into the permittee's MS4. The inventory shall identify the outfall and surface water body into which each high risk facility discharges. For the purposes of this permit, high risk facilities include:</p> <ul style="list-style-type: none"> <li>• Operating municipal landfills;</li> <li>• Hazardous waste treatment, storage, disposal and recovery facilities;</li> <li>• Facilities that are subject to EPCRA Title III, Section 313 (also known as the Toxics Release Inventory (TRI) maintained by the U.S. EPA); and</li> </ul>				

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	<ul style="list-style-type: none"> <li>Any other industrial or commercial discharge that the permittee determines is contributing a substantial pollutant loading to the permittee's MS4. This could include facilities identified through the proactive inspection program as per Part III.A.7.c of the permit.</li> </ul>							
	<p>Report on the high risk facilities inventory, including the type and total number of high risk facilities and the number of facilities newly added each year.</p>							
	<p><i>DEP Note: The TRI is updated every spring / summer by the U.S. EPA at <a href="http://www.epa.gov/triexplorer">www.epa.gov/triexplorer</a>. Select "Facility" on the left, chose your Geographic Location, and then select "Generate Report." Please indicate in Column F when (month / year) you last checked EPA's TRI for applicable facilities.</i></p>							
	<p><i>DEP Note: The total number of high risk facilities reported needs to equal the sum of the numbers of the four types of applicable facilities.</i></p>							
	<p>During Year 1 of the permit, develop and implement a written plan for conducting inspections of high risk facilities to determine compliance with all appropriate aspects of the stormwater program. While the permittee may determine the order and frequency of the inspections, the permittee shall inspect each identified facility at least once during the permit term; however, facilities identified as high risk due to the findings of the proactive inspection program as per Part III.A.7.c of the permit shall be inspected annually. Report on the high risk facilities inspection program, including the number of inspections conducted and the number and type of enforcement actions taken.</p>							
	<p><i>DEP Note: If "0" is reported for the number of inspections conducted and the permittee has one or more high risk facilities, please provide an explanation in Column F for why no inspections were conducted. 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></p>							
		<b>Number of Facilities</b> <b>Number of Inspections</b>	<b>For violations discovered during a high risk inspection</b>					
			<b>Fines issued</b>	<b>Notices of Violation (NOVs) / warning letters / citations issued</b>				
	<b>Total high risk facilities</b>	0			TRI Explorer, MSGP Database	B. Thrasher	No high risk facilities in Town	
	<b>New high risk facilities added to the inventory during the current reporting period</b>	0			TRI Explorer, MSGP Database	B. Thrasher	No new high risk facilities in Town	
	<b>Operating municipal landfills</b>	0	N/A	N/A	N/A	N/A	No landfills within the Town	
	<b>Hazardous waste treatment, storage, disposal and recovery (HWTSDR) facilities</b>	0	N/A	N/A	N/A	N/A	No HWTSDR facilities identified within the Town	
	<b>EPCRA Title III, Section 313 facilities (that are not landfills or HWTSDR facilities)</b>	0	0	N/A	N/A	EPCRA Section 313 Toxic Chemicals "List of Lists"	N/A	Listed facilities not found
	<b>Facilities determined as high risk by the permittee through the proactive inspections as per Part III.A.7.c</b>	0	0	N/A	N/A	N/A	B. Thrasher	None found
	<b>Other facilities determined as high risk by the</b>	0	0	N/A	N/A	N/A	B. Thrasher	None found

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	permittee (that are <u>not</u> facilities identified through the proactive inspections)							
<b>Part III.A.8.b</b>	<b>Industrial and High-Risk Runoff — Monitoring for High Risk Industries</b>							
	Sampling of the discharge to the stormwater system may be required on an as-needed basis in the event that inspections of high-risk facilities disclose suspected illicit discharges to the MS4. New high-risk industrial facilities as defined in 40 CFR 122.26(d)(2)(iv)(C) must be evaluated to determine if the new discharge is contributing a substantial pollutant load to the MS4. The evaluation may include site-specific monitoring. Report the number of high risk facilities sampled.							
	High risk facilities sampled				0	N/A	N/A	No high risk facilities identified within the Town MS4
<b>Part III.A.9.a</b>	<b>Construction Site Runoff — Site Planning and Non-Structural and Structural Best Management Practices</b>							
	Continue to implement the local codes or land development regulations and the written pre-construction site plan review procedures that require the use and 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 <u>reviewed for stormwater, erosion, and sedimentation controls</u> , 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				1	6/9/11 review letter	Consulting engineer for Town	Place Au Soleil Entrance Imp
	PERMITTEE SITES: Construction site plans approved				1	6/9/11 review letter	Consulting engineer for Town	
	PRIVATE SITES: Construction site plans reviewed				1	Architectural Review Log	City of Delray Beach	1220 N Ocean site plan reviewed by Town. Engineering plans under review by City of Delray Beach
	PRIVATE SITES: Construction site plans approved				0	N/A	N/A	Under review
	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				1	Architectural Review Log	Town Manager	1220 N Ocean
	Confirmed ERP coverage				0	N/A	City of Delray Beach	No projects which met the ERP

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					thresholds submitted engineering plans to the City for review during reporting period. Project 1220 N. Ocean meets the threshold but was not submitted for review as of the end of the reporting period.
	Notified of CGP stormwater permit requirements	0	N/A	City of Delray Beach	No projects which met the ERP thresholds submitted engineering plans to the City for review during reporting period. Project 1220 N. Ocean meets the threshold but was not submitted for review as of the end of the reporting period.
	Confirmed CGP coverage	0	N/A	N/A	No projects which met the ERP thresholds submitted engineering plans to the City for review during reporting period. Project 1220 N. Ocean meets the threshold but was not submitted for review as of the end of the reporting period.



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					period.
<b>Part III.A.9.b</b>	<b>Construction Site Runoff — Inspection and Enforcement</b>				
	<p>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.</p> <p><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></p> <p><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 plan in Column D and the name of the entity who finalized the plan in Column E.</i></p>				
	<b>PERMITTEE SITES: Active construction sites</b>	1	pre-con meeting minutes	Town staff	Place Au Soleil
	<b>PERMITTEE SITES: Inspections of active construction sites for proper stormwater, erosion and sedimentation BMPs</b>	29	Construction Site Inspection Report	Town staff and City of Delray Beach Inspection Department	
	<b>PERMITTEE SITES: Percentage of active construction sites inspected</b>	100%	Construction Site Inspection Checklist	Town staff and City of Delray Beach Inspection Department	
	<b>PRIVATE SITES: Active construction sites</b>	1	PPP Inspection Short Form, Stormwater PPP Inspection & Maintenance Report Form	City of Delray Beach Inspection Department	2401 N Ocean
	<b>PRIVATE SITES: Inspections of active construction sites for proper stormwater, erosion and sedimentation BMPs</b>	10	PPP Inspection Short Form	City of Delray Beach Inspection Department	
	<b>PRIVATE SITES: Percentage of active construction sites inspected</b>	100%			
	<b>Notices of Violation (NOVs) / warning letters / citations issued</b>	0	N/A	N/A	None issued
	<b>Stop Work Orders issued</b>	0	N/A	N/A	None issued
	<b>Fines issued</b>	0	N/A	N/A	None issued
	<b>Year 1 ONLY: Attach the written construction site inspection program plan</b>				

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Part III.A.9.c	<b>Construction Site Runoff — Site Operator Training</b>						
	<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 <u>or under contract with</u> 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. Follow-up 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 persons (i.e., private construction site operators) trained / certified during the applicable reporting year, and then note in Column F the number of staff and private persons who were previously trained / certified. Private site operator training can include pre-construction meetings.</i></p>						
		<b>Certification Training</b>	<b>Initial Training (non-certification)</b>	<b>Refresher Training</b>			
	<b>Permittee construction site inspectors</b>	1	1	0		Sign in sheets March 16, 2011 video training	Steering Committee B. Dietrick
	<b>Permittee construction site plan reviewers</b>	1		0		N/A	Town site plan reviewer did not attend refresher course
	<b>Permittee construction site operators</b>	0		0		N/A	No construction site operators trained by Town
	<b>Private persons</b>	0				N/A	No private persons trained by Town

**SECTION VIII. CHANGES TO THE STORMWATER MANAGEMENT PROGRAM (SWMP) ACTIVITIES (Not Applicable In Year 4)**

**SECTION VIII. CHANGES TO THE STORMWATER MANAGEMENT PROGRAM (SWMP) ACTIVITIES (Not Applicable In Year 4)**

A.	Permit Citation/ SWMP Element	<p><b>Proposed Changes to the Stormwater Management Program Activities Established as Specific Requirements Under Part III.A of the Permit (Including the Rationale for the Change) — REQUIRES DEP APPROVAL PRIOR TO CHANGE IF PROPOSING TO REPLACE OR DELETE AN ACTIVITY.</b></p> <p><i>DEP Note: There may be changes deemed necessary after developing / reviewing your plans and SOPs as per Part III.A of the permit, after completing your SWMP evaluation as per Part VI.B.2 of the permit, or due to a TMDL / BMAP as per Part VIII.B of the permit.</i></p>
		N/A
B.	Permit Citation/ SWMP Element	<p><b>Changes to the Stormwater Management Program Activities NOT Established as Specific Requirements Under Part III.A of the Permit (Including the Rationale for the Change)</b></p> <p><i>DEP Note: There may be changes deemed necessary after developing / reviewing your plans and SOPs as per Part III.A of the permit, after completing your SWMP evaluation as per Part VI.B.2 of the permit, or due to a TMDL / BMAP as per Part VIII.B of the permit.</i></p>
		N/A

## CHECKLIST A: ATTACHMENTS TO BE SUBMITTED WITH THE ANNUAL REPORTS

Below is a list of items required by the permit that may need to be attached to the annual report. Please check the appropriate box to indicate whether the item is attached or is not applicable for the current reporting period. Please provide the number and the title of the attachments in the blanks provided.

Attached	N/A	Rule / Permit Citation	Required Attachment	Attachment Number	Attachment Title
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part II.F	<b>EACH ANNUAL REPORT:</b> If program resources have decreased from the previous year, a discussion of the impacts on the implementation of the SWMP.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part III.A.1	<b>EACH ANNUAL REPORT:</b> An explanation of why the minimum inspection frequency in Table II.A.1.a was not met, if applicable.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part III.A.4	<b>EACH ANNUAL REPORT:</b> A list of the flood control projects that did <u>not</u> include stormwater treatment and an explanation for each of why it did not, if applicable.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part III.A.7.a	<b>EACH ANNUAL REPORT:</b> A report on amendments / changes to the legal authority to control illicit discharges, connections, dumping, and spills, if applicable.		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part V.B.9	<b>EACH ANNUAL REPORT:</b> Reporting and assessment of monitoring results. <b>[Also addressed in Section III of the Annual Report Form]</b>	Refer to Joint Report	Refer to Joint Report
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part VI.B.2	<b>EACH ANNUAL REPORT:</b> An evaluation of the effectiveness of the SWMP in reducing pollutant loads discharged from the MS4 that, <u>at a minimum</u> , must include responses to the questions listed in the permit.	5	Refer to Attachment #5
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part VIII.B.3.e	<b>EACH ANNUAL REPORT:</b> A status report on the implementation of the requirements in this section of the permit and on the estimated load reductions that have occurred for the pollutant(s) of concern.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part VIII.B.4.f	<b>EACH ANNUAL REPORT after approval of the BPCP:</b> The status of the implementation of the Bacterial Pollution Control Plan (BPCP).		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Rule 62-624.600(2)(a), F.A.C.	<b>YEAR 1:</b> An inventory of all known major outfalls and a map depicting the location of the major outfalls (hard copy or CD-ROM).	1	NPDES Stormwater System (MS4) Audit maps, Outfall Inventory, MS4 Pipes/Culverts Inventory
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part III.A.3	<b>YEAR 1:</b> If have curbs and gutters but no street sweeping program, an explanation of why no street sweeping program and the alternate BMPs used or planned.		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.6	<b>YEAR 1 or YEAR 2:</b> A copy of the adopted Florida-friendly Ordinance, if applicable.	2	Attachment #2 - Ordinance 11/7
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.c	<b>YEAR 1:</b> A proactive illicit discharge / connection / dumping inspection program plan.	3	Proactive Illicit Discharge/ Connection / Dumping Inspection Program Plan
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.9.b	<b>YEAR 1:</b> A construction site inspection program plan. <b>[For approval by DEP]</b>	4	Construction Site Inspection Program Plan
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part III.A.2	<b>YEAR 2:</b> A summary report of a review of codes and regulations to reduce the stormwater impact from new development / redevelopment.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part V.A.2	<b>YEAR 3:</b> Estimates of annual pollutant loadings and EMCs, and a table comparing the current calculated loadings with those from the previous two Year 3 ARs.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part III.A.2	<b>YEAR 4:</b> A follow-up report on plan implementation of changes to codes and regulations to reduce the stormwater impact from new development / redevelopment.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part V.A.3	<b>YEAR 4:</b> If the total annual pollutant loadings have not decreased over the past two permit cycles, revisions to the SWMP, as appropriate.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part V.B.3	<b>YEAR 4:</b> The monitoring plan (with revisions, if applicable).		

<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part VII.C	YEAR 4: An application to renew the permit.		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part VIII.B.3.d	YEAR 4: A TMDL Implementation Plan / Supplemental SWMP.		

**CHECKLIST B: THE REQUIRED ANNUAL REVIEWS OF WRITTEN STANDARD OPERATING PROCEDURES (SOPs) & PLANS**

The permit requires annual review, and revision if needed, of written Standard Operating Procedures (SOPs) and plans (e.g., public education and outreach, training, inspections). Please indicate your review status below. **If you have made revisions that need DEP approval, you must complete Section VIII.A of the annual report.**

Did not complete review of existing SOP / Plan	Developed new written SOP / Plan	Reviewed & no revision needed to existing SOP / Plan	Reviewed & revised existing SOP / Plan	Permit Citation	Description of Required SOPs / Plans
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.1	SOP and/or schedule of inspections and maintenance activities of the structural controls and roadway stormwater collection system.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Part III.A.2	SOP for development project review and permitting procedures and/or local codes and regulations for new development / areas of significant development.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.3	SOP for the litter control program.
N/A	N/A	N/A	N/A	Part III.A.3	SOP for the street sweeping program. <b>Not applicable, no curbed roadways.</b>
N/A	N/A	N/A	N/A	Part III.A.3	SOP for inspections of equipment yards and maintenance shops that support road maintenance activities. <b>Not applicable. No such facilities in Gulf Stream.</b>
N/A	N/A	N/A	N/A	Part III.A.5	SOP for inspections of waste treatment, storage, and disposal facilities not covered by an NPDES stormwater permit. <b>Not applicable. No such facilities in Gulf Stream.</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.6	Plan for public education and outreach on reducing the use of pesticides, herbicides and fertilizer. <b>Refer to Joint Report.</b>
N/A	N/A	N/A	N/A	Part III.A.6	<del>Plan for pesticide, herbicide and fertilizer application training</del> <i>DEP Note: A plan is not necessary since the FDACS certification / licensing program adequately fulfills the permit requirement.</i>
N/A	N/A	N/A	N/A	Part III.A.6	SOP for reducing the use of pesticides, herbicides and fertilizer, and for the proper application, storage and mixing of these products. <b>Not applicable. Contracted out.</b>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Part III.A.7.c</b>	<b>Plan for proactive illicit discharge / connections / dumping inspections.*</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.c	SOP for reactive illicit discharge / connections / dumping investigations.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.c	Plan for illicit discharge training.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.d	SOP for spill prevention and response efforts.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.d	Plan for spill prevention and response training. <b>Refer to City of Delray Beach.</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.e	Plan for public education and outreach on how to identify and report the illicit discharges and improper disposal to the MS4. <b>Conducted by SWA of Palm Beach County.</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.f	Plan for public education and outreach on the proper use and disposal of oils, toxics and household hazardous waste. <b>Refer to Joint Report.</b>
N/A	N/A	N/A	N/A	Part III.A.7.g	SOP to reduce / eliminate sanitary wastewater contamination of the MS4. <b>Town does not own or maintain a sanitary wastewater collection system.</b>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Part III.A.8	SOP for inspections of high risk industrial facilities. <b>See Attachment 3.</b>

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Part III.A.9.a	SOP for construction site plan review for stormwater, erosion and sedimentation controls, and ERP and CGP coverage. <b>See Attachment 4.</b>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Part III.A.9.b</b>	<b>Plan for inspections of construction sites.* See Attachment 4.</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Part III.A.9.c	Plan for stormwater, erosion and sedimentation BMPs training.

\* Revisions to these plans require DEP approval – please complete Section VIII.A of the annual report.

<b>REMINDER LIST OF THE TMDL / BMAP REPORTS TO BE SUBMITTED <u>SEPARATELY</u> FROM AN ANNUAL REPORT</b>		
<b>Rule / Permit Citation</b>	<b>Report Title</b>	<b>Due Date</b>
Part VIII.B.3.a	<b>6 MONTHS from effective date of permit:</b> TMDL Prioritization Report.	9/2/11
Part VIII.B.3.b	<b>12 MONTHS from effective date of permit:</b> TMDL Monitoring and Assessment Plan.	3/2/12
Part VIII.B.3.c	<b>6 MONTHS from receiving analyses from the lab:</b> TMDL Monitoring Report.	TBD
Part VIII.B.4	<b>30 MONTHS from effective date of permit:</b> A Bacterial Pollution Control Plan (BPCP).	9/2/13

**END OF REVISED TAILORED MS4 AR FORM  
CYCLE 3 PERMIT**