



Public Works
Department

May 15, 2012

Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Attention: Mr. Eric H. Livingston
Program Administrator
NPDES Stormwater Section

Dear Mr. Livingston:

Reference: Palm Beach County Municipal Separate Storm Sewer System (MS4)
NPDES Permit No. FLS00018
Year 1, Cycle 3 Annual Report Comments - Request for Additional
Information
Town of Lake Park, Florida

In response to the comments letter dated April 12, 2012 regarding the Town of
Lake Park, we offer the following corresponding responses:

1. The Total Length of Ditches/Conveyance Swales was inadvertently left off the form. The total has been added to the attached revised Annual Report.
2. The estimated area maintained was left blank because of the conflicting units of measurement for the areas that were used. The Town maintains one roadway and 2 parks with respect to litter control. The amount of area maintained is equal to 25.5 acres and this figure has been added to the Annual Report.
3. At the time of preparation of the Annual Report the Town did not have the documentation to support certification of personnel and contractors. This information has been located and added to the Annual Report.
4. At the time of preparation of the Annual Report the Town did not have the documentation to support the spill training completed. This information has been located and added to the Annual Report.
5. The Town has contacted Seacoast Utility Authority who has indicated that there were no SSO's reported and approximately 1,219 L.F. of sanitary sewer was slip lined and approximately 377 L.F. of gravity sewer was replaced. This information has been added to the Annual Report.

660 Old Dixie Highway
Lake Park, FL 33907
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6. The permit requires that all high risk facilities that contribute to the Town's MS4 be inspected at least once during the permit term. The Town is implementing procedures to document these inspections. This information will be reported in the next Annual Report.

Attached to this letter are the applicable sheets with additional clarifications added as necessary.

If you have any comments or require additional information please contact me directly.

Respectfully yours,



J. David Hunt
Public Works Director

dhunt@lakeparkflorida.gov

Enclosures

cc: Jamie Titcomb, Interim Town Manager, Town of Lake Park
Alan Wertepny, Mock Roos
Phillip "Tad" Rowe, Simmons & White, Inc.

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	
Part III.A.1	Structural Controls and Stormwater Collection Systems Operation									
<p>Maintain an up-to-date inventory of the structural controls and roadway stormwater collection structures operated by the permittee, including, at a minimum, all of the types of control structures listed in Table II.A.1.a of the permit. Report the current known inventory.</p> <p>Report the number of inspection and maintenance activities conducted for each type of structure included in Table II.A.1.a, and the percentage of the total inventory of each type of structure inspected and maintained. If the minimum inspection frequencies set forth in Table II.A.1.a were not met, provide as an attachment an explanation of why they were not and a description of the actions that will be taken to ensure that they will be met.</p>										
Type of Structure			Number of Activities Performed					Documentation / Record	Entity Performing the Activity	Comments
			Total Number of Structures	Number of Inspections	Percentage Inspected	Number of Maintenance Activities	Percentage Maintained			
Exfiltration trench / French drains (linear feet)			7791	726	9%	726	9%	Inspection Forms	Public Works	% not met due to short reporting period
Dry detention systems			1	1	100%	0	0	Inspection Forms	Public Works	No maintenance necessary
Major stormwater outfalls			10	3	30%	3	30%	Inspection Forms	Public Works	Outfall cleaned w/ Vaccon Truck
MS4 pipes / culverts (miles)			46170	15993	35%	15993	35%	Inspection Forms	Public Works	Pipes cleaned w/ Vaccon Truck
Inlets / catch basins / grates			409	125	31%	125	31%	Inspection Forms	Public Works	Inlets cleaned w/ Vaccon Truck
Ditches / conveyance swales (l.f.)			79,200	1154	2%	1154	2%	Inspection Forms	Public Works	Swales regraded and sodded
ATTACH explanation if any of the minimum inspection frequencies in Table II.A.1.a were <u>not</u> met										
Year 1 ONLY: Attach a map of all known major outfalls as per Rule 62-624.600(2)(a), F.A.C.										

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Part III.A.2	Areas of New Development and Significant Redevelopment				
	Report the number of new development and significant redevelopment projects reviewed by the permittee for post-development stormwater considerations.				
	Number of new development / significant redevelopment projects reviewed	0			No new projects submitted
	Provide in the Year 2 Annual Report the summary report of the review of local codes activity. Provide in the Year 4 Annual Report the follow-up report on plan implementation of modifying codes to allow low impact design BMPs.				
	Year 2 ONLY: Attach the summary report of the review activity				
	Year 4 ONLY: Attach the follow-up report on plan implementation				
Part III.A.3	Roadways				
	Annually review (and revise, as needed) and implement the permittee's written procedures for the litter control program(s) for public streets, roads, and highways, including rights-of-way, employed within the permittee's jurisdictional area and properly dispose of collected material. Implement the program on a monthly, or on an as needed, basis. Report on the litter control program, including the frequency of litter collection, an estimate of the total number of road miles cleaned or amount of area covered by the activities, and an estimate of the quantity of litter collected.				
	PERMITTEE Litter Control Program: Frequency of litter collection	Weekly	Collection Records	Public Works	
	PERMITTEE Litter Control Program: Estimated amount of area maintained (acres)	25.5			1 road, 2 parks
	PERMITTEE Litter Control Program: Estimated amount of litter collected (cubic yards)	673			
	CONTRACTOR Litter Control Program: Frequency of litter collection	0			
	CONTRACTOR Litter Control Program: Estimated amount of area maintained (linear feet)	0			
	CONTRACTOR Litter Control Program: Estimated amount of litter collected (cubic yards)	0			
	If an Adopt-A-Road or similar program is implemented, report the total number of road miles cleaned and an estimate of the quantity of litter collected.				
	Keep PBC Beautiful Trash Pick-up Events: Total miles cleaned	1/2	Report Form	KPBCB	
	Keep PBC Beautiful Trash Pick-up Events: Estimated amount of litter collected (lbs.)	300			
	Coastal Cleanup Program: Total miles cleaned	1.5	Report Form	Ocean Conservancy	
	Coastal Cleanup Program: Estimated amount of litter collected (lbs)	150			
	Report on the street sweeping program, including the frequency of the sweeping, total miles swept, an estimate of the quantity of sweepings collected, and the total nitrogen (TN) and total phosphorus (TP) loadings that were removed by the collection of sweepings. If no street sweeping program is implemented, provide the explanation of why not in the Year 1 Annual Report.				
	Frequency of street sweeping	Semi Monthly			
	Total miles swept (per year)	450	Sweeper Logs	Public Works	
	Estimated quantity of sweeping material collected (cubic yards)	33.75	Sweeper Logs	Public Works	
	Total nitrogen loadings removed (pounds)	44	Records	Consultant	FSA Calculator
	Total phosphorus loadings removed (pounds)	28	Records	Consultant	FSA Calculator
	Year 1 ONLY: If have curbs and gutters, attach explanation of why no				

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	pesticides, herbicides, or fertilizers on permittee-owned property, as well as any permittee personnel employed in the application of these products. Report the number of permittee personnel applicators and contracted commercial applicators of pesticides and herbicides who are FDACS certified / licensed. Report the number of permittee personnel and contractors who have been trained through the Green Industry BMP Program, and the number of contracted commercial applicators of fertilizer who are FDACS certified / licensed.				
	PERSONNEL: Florida Department of Agriculture and Consumer Services (FDACS) certified applicators of pesticides and herbicides	0			Application is contracted
	CONTRACTORS: FDACS certified / licensed applicators of pesticides and herbicides	1	State License	Nozzle Nolen	
	CONTRACTORS: FDACS certified / licensed applicators of fertilizer	1	State License	Rood Landscape	
	PERSONNEL: Green Industry BMP Program training completed	2	Registration Form	UF IFAS	
	CONTRACTORS: Green Industry BMP Program training completed	0			
	Pursuant to SB 2080 (2009), all local governments are encouraged to adopt a Florida-friendly Landscaping Ordinance similar to the one set forth in the document "Florida-friendly Guidance Models for Ordinances, Covenants and Restrictions." If the broader Florida-friendly ordinance described above is not adopted, then <u>all local governments within the watershed of a nutrient-impaired water body shall adopt the Department's Model Ordinance for Florida-Friendly Fertilizer Use on Urban Landscapes pursuant to SB 494 (2009) or an ordinance that includes all of the requirements set forth in the Model Ordinance. <u>The ordinance shall be adopted within 24 months of the date of permit issuance.</u></u> Provide a copy of the adopted ordinance with the subsequent Year 1 or Year 2 Annual Report.				
	Year 1 or Year 2 ONLY: Attach copy of adopted Florida-friendly ordinance				Not within the watershed of a nutrient impaired water body.
	During Year 1 of the permit, develop and implement a written public education and outreach program plan to encourage citizens to reduce their use of pesticides, herbicides, and fertilizers. Report on the public education and outreach activities that are performed or sponsored by the permittee within the permittee's jurisdiction to encourage citizens to reduce their use of pesticides, herbicides, and fertilizers, 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). Activities performed under the Florida Yards and Neighborhoods (FYN) program should only be reported if the permittee is contributing funding towards the FYN staff and program within its jurisdiction.				
	FYN PROGRAM FUNDING: Permittee Provides Funding? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Amount of Funding = \$				
	Public education and outreach program	The public outreach and education plan is carried out as a joint effort by the Palm Beach County Co-permittees. Please see the Palm Beach County Joint Annual Report for the public education and outreach information.			
Part III.A.7.a	Illicit Discharges and Improper Disposal — Inspections, Ordinances, and Enforcement Measures				
	Where applicable, strengthen the 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. Report amendments, as needed.				

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	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).					
		Initial Training	Refresher Training			
	Personnel trained	20	4		Sign in Sheet	Town
Contractors trained	1	0		Sign In Sheet	PBC Joint Committee	
Part III.A.7.e	Illicit Discharges and Improper Disposal — Public Reporting					
	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).					
	Public education and outreach program		The public outreach and education plan is carried out as a joint effort by the Palm Beach County Co-permittees. Please see the Palm Beach County Joint Annual Report for the public education and outreach information.			
Part III.A.7.f	Illicit Discharges and Improper Disposal — Oils, Toxics, and Household Hazardous Waste Control					
	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).					
	Public education and outreach program		The public outreach and education plan is carried out as a joint effort by the Palm Beach County Co-permittees. Please see the Palm Beach County Joint Annual Report for the public education and outreach information.			
Part III.A.7.g	Illicit Discharges and Improper Disposal — Limitation of Sanitary Sewer Seepage					
	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.					
	Activity to reduce/eliminate SSOs and inflow / infiltration: Repair / lining of sanitary sewer system		1219’ sewer lined 377’ sewer replace	Correspondence From SUA	SUA	
	Activity to reduce/eliminate SSOs and inflow / infiltration: Septic systems removed		0			n/a
Activity to reduce/eliminate SSOs and inflow / infiltration: Emergency generator added		0			n/a	

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	<p align="center">SSO incidents discovered</p> <p align="center">SSO incidents resolved</p> <p align="center">Inflow / infiltration incidents discovered</p> <p align="center">Inflow / infiltration incidents resolved</p> <p align="center">Name of owner of the sanitary sewer system</p>	<p align="center">0</p> <p align="center">0</p> <p align="center">0</p> <p align="center">0</p>			<p align="center">None Reported</p> <p align="center">n/a</p> <p align="center">None reported</p> <p align="center">n/a</p>			
	Seacoast Utility Authority							
Part III.A.8.a	Industrial and High-Risk Runoff — Identification of Priorities and Procedures for Inspections							
	<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"> • Operating municipal landfills; • Hazardous waste treatment, storage, disposal and recovery facilities; • 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 • 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. <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>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 align="center">Number of Facilities</p>	<p align="center">Number of Inspections</p>	<p align="center">For violations discovered during a high risk inspection</p> <p align="center">Fines issued</p> <p align="center">Notices of Violation (NOVs) / warning letters / citations issued</p>				
	Total high risk facilities		35					Per EPA Website
	New high risk facilities added to the inventory during the current reporting period		0					
	Operating municipal landfills		0	0	0	0		
	Hazardous waste treatment, storage, disposal and recovery (HWTSDR) facilities		35	0	0	0		
	EPCRA Title III, Section 313 facilities (that are not landfills or HWTSDR facilities)		0	0	0	0		Per TRI
	Facilities determined as high risk by the permittee through the proactive inspections as per Part III.A.7.c		0	0	0	0		
	Other facilities determined as high risk by the		0	0	0	0		