

April 25, 2012

Via Email Only: [Kenneth.Kuhl@dep.state.fl.us](mailto:Kenneth.Kuhl@dep.state.fl.us)

Mr. Ken Kuhl  
NPDES Stormwater Section  
Florida Department of Environmental Protection  
Mail Station 2500  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Ref. No. B0040.09  
Subject: Third Permit Term 1<sup>st</sup> Year Annual Report  
(March 2, 2011 – September 30, 2011) for  
Palm Beach County NPDES – MS4 Permittees  
NPDES Permit No. FLS-000018  
City of Lake Worth RAI Response

Dear Ken:

Pursuant to your letter dated April 12, 2012, the City of Lake Worth has reviewed your request for additional information and have provided the following additional documentation and clarification. We have prepared responses and additional attachments for each of the three questions:

1. Section VII, Part III.A.3 of the Annual Report form requires the permittee to report the frequency of street sweeping activities and the loadings of total nitrogen and phosphorus removed in pounds. Provide the information required in this section or explain why this information is not available in Column F “Comments”. In addition, if no street sweeping is being performed provide an explanation of why no program is necessary or possible, including the alternate BMPs used or planned to offset the load reductions not achieved through street sweeping.

**Response:** The information on the City’s street sweeping activities was reported incorrectly. Attached is the corrected information for pages 6 and 7 of Section VII, Part III.A.3. Since the majority of the City’s streets have curb and gutter systems, the City has a very extensive street sweeping program in which all the streets are sweep four (4) times a week.

2. Section VII, Part III.A.5 of the Annual Report form requires the permittee to report and inspect solid waste storage facilities, including temporary storage of litter, street sweeping residuals, or other roadside debris in roll offs. Confirm that “roll offs” referenced in the litter collection section of the annual report, related to the temporary storage of litter, are not subject to reporting and inspection as required in Part III.A.5 of the permit.

**Response:** The City owns 48 Roll Offs--520 Dumpsters that are located throughout the City. These dumpsters are collected by the City's waste removal division and the material is transported to the Palm Beach County Solid Waste Authority facility. The nearest transportation station is in Lantana. The City does not have a solid waste holding/storage facility.

3. Section VII, Part III.A.7.g of the Annual Report form requires the permittee to obtain and report SSO incidents and preventive activities within the municipality's jurisdiction, even if performed by a third party (Lake Worth Utility or the county health department). Provide the information required by this section of the Annual Report or adequately explain non-performance in Column F "Comments".

**Response:** Lake Worth Utilities is responsible for the sanitary sewer system throughout the City. There are no septic systems within the City and there was only one sanitary lining project. The 2<sup>nd</sup> Avenue South Construction plans were completed. The project went out for construction bids in January 2012 and construction should start during the summer of 2012. Information requested on Section VII, Part III.A.7.g has been updated and is attached.

Should you have any questions regarding this information please contact me via email at [htowns@lakeworth.org](mailto:htowns@lakeworth.org) or by phone at (561) 533-7346.

Sincerely,

Horace Towns  
Storm Water/Street Supervisor

Copies Alan Wertepny(Via Email Only- alan.wertepny@mockcross.com



# ANNUAL REPORT FORM FOR INDIVIDUAL NPDES PERMITS FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (RULE 62-624.600(2), F.A.C.)

- This Annual Report Form must be completed and submitted to the Department to satisfy the annual reporting requirements established in Rule 62-621.600, F.A.C.
- Submit this fully completed and signed form and any REQUIRED attachments by mail to the address in the box at right.
- Refer to the Form Instructions for guidance on completing each section.
- **Please print or type information in the appropriate areas below.**

**Submit the form and attachments to:**  
 Florida Department of Environmental Protection  
 Mail Station 2500  
 2600 Blair Stone Road  
 Tallahassee, Florida 32399-2400

**SECTION I. BACKGROUND INFORMATION**

<b>A.</b>	Permittee Name: Lake Worth, City of		
<b>B.</b>	Permit Name: Palm Beach County Municipal Separate Storm Sewer System		
<b>C.</b>	Permit Number: FLS000018-003 (Cycle 3)		
<b>D.</b>	Annual Report Year: <input checked="" type="checkbox"/> Year 1 <input type="checkbox"/> Year 2 <input type="checkbox"/> Year 3 <input type="checkbox"/> Year 4 <input type="checkbox"/> Year 5 <input type="checkbox"/> Other, specify Year:		
<b>E.</b>	Reporting Time Period (month/year): MAR/ 2011 through SEPT / 2011		
<b>F.</b>	Name of the Responsible Authority: JAMIE BROWN		
	Title: INTERIM PUBLIC SERVICES DIRECTOR		
	Mailing Address: 1749 3 <sup>RD</sup> AVENUE SOUTH		
	City: LAKE WORTH	Zip Code: 33460	County: PALM BEACH COUNTY
	Telephone Number: 561-586-1720		Fax Number:
E-mail Address: jbrown@lakeworth.org			
<b>G.</b>	Name of the Designated Stormwater Management Program Contact (if different from Section I.F above): HORACE TOWNS		
	Title: STORMWATER/STREETS SUPERVISOR		
	Department: STORMWATER/STREETS		
	Mailing Address: 1880 2 <sup>ND</sup> AVENUE NORTH		
	City: LAKE WORTH	Zip Code: 33460	County: PALM BEACH
	Telephone Number: 561-533-7346		Fax Number:
E-mail Address: htowns@lakeworth.org			

**SECTION II. MS4 MAJOR OUTFALL INVENTORY (Not Applicable In Year 1)**

<b>A.</b>	Number of outfalls ADDED to the outfall inventory in the current reporting year (insert "0" if none): (Does this number include non-major outfalls? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable)
<b>B.</b>	Number of outfalls REMOVED from the outfall inventory in the current reporting year (insert "0" if none): (Does this number include non-major outfalls? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable)
<b>C.</b>	Is the change in the total number of outfalls due to lands annexed or vacated? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable

**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><i>DEP Note: The permittee may choose its own unit of measurement for the amount of litter collected. Unit options include: bags, cubic yards, pounds, tons. If an Adopt-A-Road or similar program is not implemented by the permittee, please note that in Column F but do not remove the Adopt-A-Road Program reporting items.</i></p>				
	<p><b>Keep PBC Beautiful Trash Pick-up Events: Total miles cleaned</b></p>	24	Special events log	Grounds dept	File kept in grounds maintenance
	<p><b>Keep PBC Beautiful Trash Pick-up Events: Estimated amount of litter collected (cubic yards)</b></p>	375	Trash Pick up special Events pick up log & the disposal assessment form SWA	Grounds maintenance	City Co-Sponsored events Bryant Park (100) Evening on The Avenues (24) 33 gal bag=0.19 cy total 684 bags collected and 8531.5/5 gallon buckets collected.
	<p><b>Adopt-A-Road Program: Total miles cleaned</b></p>	0			Not Needed
	<p><b>Adopt-A-Road Program: Estimated amount of litter collected (cubic yards)</b></p>	0			
	<p>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.</p> <p><i>DEP Note: Please provide an explanation in Column F for any "0" reported in Column C. Also, the permittee may choose its own unit of measurement for the amount of sweeping material collected. Unit options include: cubic yards, pounds, tons.</i></p> <p><i>DEP Note: If the permittee has curbs and gutters but no street sweeping program is implemented, the permittee must provide an explanation of why not in the Year 1 Annual Report. Refer to Part III.A.3 of the permit for the information that must be included in the explanation (including the alternate BMPs used or planned in lieu of street sweeping). Please provide the title of the attached explanation in Column D and the name of the entity who finalized the explanation in Column E.</i></p>				
	<p><b>Frequency of street sweeping</b></p>	Streets are swept 4X weekly by 2 street sweepers	N.P.D.E.S Street sweeper log	Lake Worth Stormwater Dept	
	<p><b>Total miles swept (per year)</b></p>	6236	Street sweeper Log	Lake Worth Stormwater	Weight taken from receipts and added up on tipping fee log
	<p><b>Estimated quantity of sweeping material collected (cubic yards)</b></p>	734	Street sweeper Log	Lake Worth Stormwater	Weight taken from receipts and added up on tipping fee log

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	Total nitrogen loadings removed (pounds)	947	FSA Spreadsheet	Lake Worth Stormwater	Calculated based on median value of nutrient removed
	Total phosphorus loadings removed (pounds)	608	FSA Spreadsheet	Lake Worth Stormwater	Calculated based on median value of nutrient removed
	Year 1 ONLY: If have curbs and gutters, attach explanation of why no street sweeping program and the alternate BMPs used or planned				
	Annually review (and revise, as needed) and implement the permittee's written standard practices to reduce the pollutants in stormwater runoff from areas associated with road repair and maintenance, and from permittee-owned or operated equipment yards and maintenance shops that support road maintenance activities. Report the number of applicable facilities and the number of inspections conducted for each facility.				
	<i>DEP Note: The permittee needs to "customize" this section by listing the names of the applicable facilities in Column B and the number of inspections of each facility in Column C. Add more rows if necessary. If "0" is reported in Column C for the number of inspections conducted and the permittee has one or more applicable facilities, please provide an explanation in Column F for why no inspections were conducted. In addition, if the same facility is applicable under both Parts III.A.3 and III.A.5 of the permit, the same site inspection can count towards both inspection requirements as long as it covers the applicable waste area(s). Be sure to report the site inspection under both Parts III.A.3 and III.A.5.</i>				
		Number of Inspections			
	Name of facility #1:	12	Municipal maintenance yard inspection checklist	Public Services Garage	Lake Worth Public Services Garage handles all equipment & vehicle repair's1`
	Name of facility #2:				
Part III.A.4	Flood Control Projects				
	Report the total number of flood control projects that were constructed by the permittee during the reporting period and the number of those projects that did NOT include stormwater treatment. The permittee shall provide a list of the projects where stormwater treatment was not included with an explanation for each of why it was not. Report on any stormwater retrofit planning activities and the associated implementation of retrofitting projects to reduce stormwater pollutant loads from existing drainage systems that do not have treatment BMPs.				
	<i>DEP Note: A "stormwater retrofit project" is one implemented primarily to provide stormwater treatment.</i>				
	<i>DEP Note: The status of the flood control and retrofit projects should be reported as of the last day of the applicable reporting period. Therefore, there should be no duplication for those reported as planned, for those reported as under construction and for those reported as completed.</i>				
	<i>DEP Note: If applicable, please provide the title of the attached list of flood control projects that did not include stormwater treatment in Column D and the name of the entity who finalized the list in Column E.</i>				
	Flood control projects completed during the reporting period	0	C.I.P	Public Services	2 av.N bafflebox

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Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity	Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments
	<p>Estimated percentage of the population reached by the activities in total</p> <p>Brochures/Flyers/Fact sheets distributed</p> <p>Household Hazardous Waste (HHW) Collection Day: Events</p> <p>HHW Collection Day: Amount of waste collected/recycled/properly disposed (tons)</p> <p>Neighborhood presentations: Number conducted</p> <p>Neighborhood presentations: Number of participants</p> <p>Newspapers &amp; newsletters: Number of articles/notices published</p> <p>Newsletters: Number of newsletters distributed</p> <p>Public displays (e.g., kiosks, storyboards, posters, etc.)</p> <p>Radio or television Public Service Announcements (PSAs)</p> <p>School presentations: Number conducted</p> <p>School presentations: Number of participants</p> <p>Seminars/Workshops: Number conducted</p> <p>Seminars/Workshops: Number of participants</p> <p>Special events: Number conducted</p> <p>Special events: Number of participants</p> <p>Storm sewer inlets newly marked/replaced</p> <p>Web Site: Number of visitors to the stormwater-related pages</p>				
Part III.A.7.g	<b>Illicit Discharges and Improper Disposal — Limitation of Sanitary Sewer Seepage</b>				
	<p>Annually review (and revise, as needed) and implement the permittee’s written procedures to reduce or eliminate <u>sanitary wastewater contamination</u> into the MS4, 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 into the MS4.</i></p>				
	<b>Activity to reduce/eliminate SSOs and inflow / infiltration: Repair / lining of sanitary sewer system</b>	1	Construction Plans	Lake Worth Utilities	2 <sup>nd</sup> Avenue So.
	<b>Activity to reduce/eliminate SSOs and inflow / infiltration: Septic systems removed</b>	0			No Septic System
	<b>Activity to reduce/eliminate SSOs and inflow / infiltration: Emergency generator added</b>	0		Lake Worth Utilities	None Needed
	<b>SSO incidents discovered</b>	0	Emergency	Lake Worth	None Reported

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Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity		Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments			
	SSO incidents resolved		0	Response Log	Utilities				
	Inflow / infiltration incidents discovered		0		Lake Worth Utilities	None Found			
	Inflow / infiltration incidents resolved		0						
	Name of owner of the sanitary sewer system		Lake Worth Utilities						
<b>Part III.A.8.a</b>	<b>Industrial and High-Risk Runoff — Identification of Priorities and Procedures for Inspections</b>								
<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> <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>									
			Number of Facilities	Number of Inspections	For violations discovered during a high risk inspection				
			Fines issued	Notices of Violation (NOVs) / warning letters / citations issued					
<b>Total high risk facilities</b>			126				EPA Websites	Mock•Roos & Public Works	
<b>New high risk facilities added to the inventory during the current reporting period</b>			0						