



Proactive Inspection Program

Section III.A.7.c – Illicit Discharges and Improper Disposal – Inspection and Investigation of Suspected Illicit Discharges and/or Improper Disposal

This permit element requires a written **proactive inspection program** for identifying and eliminating sources of illicit discharges, illicit connection or illegal dumping, to your MS4.

- You must inspect portions of your MS4 that have a reasonable potential of containing illicit discharges/connections/dumping. The FDEP has indicated that this should be considered to be the commercial and industrial zoned areas/properties within your MS4 contributing area.
- FDEP allows these inspections to be combined with other inspection programs, but the inspections must include specific inspection for potential stormwater contamination.

Proactive Inspections Written Program Components

1. Procedure and Criteria for identifying priority areas/facilities
2. List of identified priority areas/facilities
3. Annual schedule for inspections
4. Procedure for conducting site inspections (include checking for Multi Sector General Permit/MSGP)
5. Procedure for tracing source of discovered or suspected illicit discharge
6. Procedure for eliminating the discharge
7. Procedure for documenting the inspections and enforcement activities
(See form)
8. Procedures for enforcement actions (or referrals to appropriate jurisdictional authority)
9. Identification of staff /department/outside entity responsible for inspections and for enforcement
10. Description of resources allocated to implement this permit element



Proactive Inspection Program (Written Procedures)

1. Procedure and Criteria for identifying priority areas/facilities

According to the MS4 NPDES permit, priority areas for inspection should include:

- Areas with older infrastructure
- Industrial, commercial, or mixed use areas
- Areas with history of past illicit discharges and/or illegal dumping
- Areas with on-site sewage disposal systems
- Areas upstream of sensitive or impaired water bodies

Wellington already has identified priority areas/ facilities based upon risk for potential contamination and historical knowledge of illicit discharges and/or improper disposal. A complete list is provided below. General areas of concern are shown on the attached map.

2. List of identified priority areas/facilities

Each year, a list of addresses is created from an overlay of the map above and associated database with the PBC Property Appraiser's website. This list is cross-referenced with the Florida Department of Environmental Protection (FDEP) list of facilities that have a Multi-Sector Generic Permit (MSGP). If any facilities that appear to require an MSGP are not on the FDEP list, the names and addresses of those businesses are referred to FDEP. The annual creation of the list of addresses and cross-referencing with the FDEP MSGP database is done by Utilities and Public Works Department, typically in the month of June each year.

The PW Infrastructure Manager will conduct an annual record search on the PBC Property Appraiser's website for Wellington based businesses to determine if any businesses are associated with industrial or manufacturing activities and/or facility types associated with the FDEP MSGP Sectors. If it is determined that a facility falls within a Sector(s) type

http://www.dep.state.fl.us/water/stormwater/npdes/docs/msgp/MSGP_sectors.pdf) notification will be sent to FDEP that they may require MSGP. A copy of each search will be kept on file with the corresponding annual report information.

A list (or, an attached map) of the priority proactive inspection area/facilities follows. Priority facilities are checked against the list of facility types associated with the FDEP MSGP Sectors

http://www.dep.state.fl.us/water/stormwater/npdes/docs/msgp/MSGP_sectors.pdf) to determine their need to be covered by a MSGP and notification will be sent to FDEP that they may require MSGP.

1) Areas with Older Infrastructure:

- a. North/East of Forest Hill Blvd. between Birkdale and Wellington Trace (North)

2) Light Industrial, Commercial, or mixed Uses:

- a. Wellington Commerce/Business Park — Pierson Road
- b. Wellington Mall (Old)
- c. Wellington Green Mall
- d. Marketplace Shopping Center
- e. Courtyard Shops Shopping Center
- f. Town Center Area
- g. Wellington Regional Medical Center
- h. SR7 Commercial Corridor
- i. Palm Beach International Equestrian Center
- j. Equestrian Village
- k. Nurseries
- l. Equestrian Preserve Area
- m. Wastewater Treatment Plant
- n. Water Treatment Plant
- o. Public Works Facility
- p. Parks and Recreation Maintenance
- q. Golf Courses

3) Areas with History of Past Illicit Discharges and/or Illegal Dumping:

- a. Shopping Centers
- b. Equestrian Preserve Area
- c. Wellington Commerce Park

4) Areas with On-Site Sewage Disposal Systems

- a. Rustic Ranches
- b. Little Ranches
- c. Paddock Park

~~d. Saddle Trail~~

~~e. Equestrian Preserve Area~~

~~5) Areas Upstream of Sensitive or Impaired Water Bodies~~

~~a. None~~

~~6) High Risk Facilities~~

3. Annual schedule for inspections

All priority areas/facilities are inspected at least once within the current five-year permit term. The inspection area has been divided into five zones. One zone will be inspected during each year of the permit term. If an area is found to have illicit discharges/connections/dumping, it is re-inspected for compliance and if warranted, specific facilities within that area are considered for placement on the high risk facility list for more frequent inspection.

In addition, inspections for signs of illicit discharges are part of the Standard Operating Procedure for all structural control inspections and maintenance. A “checkbox” for this activity is included on the inspection forms for those activities. If a suspected illicit is identified, it is reported to Code Compliance for investigation under the Reactive Investigations program.

Finally, all appropriate field personnel receive illicit discharge and illegal dumping identification and notification training. If a suspected illicit is identified during the course of performing their regular activities, it is reported to Code Compliance for investigation under the Reactive Investigations program. The field inspections are the primary responsibility of Utilities – Construction Coordinator. The pro-active inspections that take place during the inspection of structural controls and other MS4 components, is the responsibility of Public Works Stormwater Division. Inspections are carried out throughout the year.

~~If a facility or area is discovered to have illicit discharges/connections/dumping, it will be monitored until compliance is achieved and then placed on the schedule for re-inspection the following year. In many instances where illicit activities are detected, these areas will be monitored more frequently. The schedule for inspecting the priority areas/facilities is:~~



All light industrial/commercial areas (Past/Historical Areas included in this subset) are inspected at least annually by Utility personnel as part of Wellington's Grease Trap inspection program.

All areas with older infrastructure are inspected annually by Utility personnel and Engineering personnel.

All areas with On-Site Sewage Disposal Systems are inspected annually by Code Enforcement personnel as part of Wellington's BMP program.

All High Risk Facilities are inspected annually by the Infrastructure Manager or his/her designee (Surface Water Management Supervisor).

4. Procedure for conducting site inspections (include checking for MSGP)

The Utilities Construction Coordinator patrols the prioritized area searching for indications of illicit discharges/connections/dumping into the City's MS4, in accordance with the training received. If any are identified, the inspector makes a cursory attempt at identifying the source of the illicit. If the source is identified, the inspector makes the decision to either approach the facility owner or refer the finding to his supervisor for further action. In speaking with the facility owner or operator, the inspector advises of the findings and cites ordinance which prohibits such discharges. The inspector may use photo documentation to support the inspection. The inspector indicates his/her intention to return to verify that the problem has been corrected.

If no source is identified, the findings are reported to the inspector's supervisor for further investigation.

The pro-active inspections that take place during the inspection of structural controls and other MS4 components, is the responsibility of is the responsibility of Public Works Stormwater Division. Inspections are carried out throughout the year.

Priority Facility inspections: For proactive facility inspections, the trained inspector conducts an unannounced visit to the facility. A standardized inspection form is used (see attached).

Priority Area inspections: For general areas that have been designated to have a reasonable potential of containing illicit discharges/connections/dumping, a drive-

around procedure is followed. The trained inspector(s) patrols the prioritized area searching for indications of illicit discharges/connections/dumping. If any are identified, the inspector either stops to do a Facility Inspection, a reactive investigation, or completes a work order form for the appropriate personnel to complete the investigation.

5. Procedure for tracing source of discovered illicit discharge

Tracing the source of illicit discharges is achieved by a variety of techniques, including visual observation, odor detection, chemical testing and analytic and video equipment.

6. Procedure for eliminating the discharge

The procedures for eliminating illicit discharges are as follows:

- 1) Illicit Dumping/Discharges – Source of dumping is identified (directly or through investigation & monitoring) and the offender is cited and directed to cease illegal dumping. Continue to monitor for issues.
- 2) Illicit Connection to Pipe - Offender is notified and cited. Connection immediately is plugged or removed. Continue to monitor for issues.

7. Procedure for documenting the inspections and enforcement activities

The attached inspection form is used for pro-active inspections and the subsequent follow-up. Photo documentation will also be provided, as needed. Selected activity related to the pro-active inspection program is logged into a database for management. The electronic files facilitate follow-up, referrals and year-end summarizing.

The MSGP coverage research and reporting will be documented by copies of the lists generated during each step (list of facilities within MS4 that are commercial/industrial), list of facilities in the City with MSGP coverage, list of facilities that appear to need MSGP coverage but appear not to have it). These lists will be maintained with other back-up documentation to support the annual permit activities conducted by the City. The list of facilities that appear to need MSGP coverage will be sent to FDEP for follow-up.

Inspection documenting procedures include: 1) Completion of the attached inspection form; 2) Photographs as needed; 3) Entering inspection data/photos into a master database for monitoring/management/reporting.



Enforcement documenting procedures include: 1) Completion of Notice of Violation form; 2) Correspondence (letters and other Notices); 3) Photos; 4) Entering data into master data base for reporting/monitoring/management; 5) Entering location on map.

8. Procedures for enforcement actions (or referrals to appropriate jurisdictional authority)

Initial enforcement/compliance is assigned to the NPDES Inspector. If compliance is not achieved, cases within the jurisdiction of the Village of Wellington are given to Wellington's Code Enforcement Division. Enforcement is conducted pursuant to existing procedures. For cases outside Wellington's MS4, the appropriate entity is notified.

9. Identification of staff /department/outside entity responsible for inspections and for enforcement

The parties responsible for inspections and enforcement are:

- 1) Inspections
 - a. Engineering and Construction Services – Construction Manager
 - b. Utilities – Construction Coordinator
 - c. Public Works – Stormwater Manager
- 2) Enforcement
 - a. Initial enforcement handled by Inspectors (above)
 - b. Protracted enforcement conducted by Code Enforcement Officers

10. Description of resources allocated to implement this permit element

Each department responsible for the inspection and enforcement of illicit discharges and improper disposal has the necessary tools, including funding, vehicles, computers, equipment, inspection forms and training to implement the program.



Proactive Illicit Discharge/Illegal Connection Inspection Form

(Use as many sheets as necessary)

Date of Inspection: _____ Inspector Name: _____

New Inspection

Follow-up Inspection

Description of inspection area: _____

Identification of MS4 component that could receive discharge from this site/area: _____

Findings:

Evidence of illicit connections to storm sewer? Yes ___ No ___

Evidence of dumping/spills to storm sewer? Yes ___ No ___

Evidence of wash water going to storm sewer? Yes ___ No ___

Storage tanks leaking or improperly contained? Yes ___ No ___

Stockpiles/debris piles uncontained? Yes ___ No ___

If "yes," to any above, describe:

Type of Enforcement Action Taken: _____

Date to verify correction: _____