



 Attachments can contain viruses that may harm your computer. Attachments may not display correctly.

**Jane E Hayes**

**From:** Anne Marie Capelli **Sent:** Thu 5/10/2012 12:25 PM  
**To:** Ken Kuhl; Livingston, Eric; Heather Ritchie  
**Cc:** Sam Heady; Benny Rodgers; Alan D. Wertepny; Jane E Hayes  
**Subject:** City of West Palm Beach Response to RAI on AR and SOPs (MR PA#W9103.00)  
**Attachments:**  [Litter Control Program.doc\(26KB\)](#)  [Illicits-Proactive-Insp Program.doc\(39KB\)](#)  [ARF litter info.pdf\(25KB\)](#)  
 [ENG NPDES Compliance Inspection Report 5-10-12.pdf\(794KB\)](#)

VIA E-MAIL: [Kenneth.Kuhl@dep.state.fl.us](mailto:Kenneth.Kuhl@dep.state.fl.us)

Kenneth Kuhl  
 Environmental Specialist  
 NPDES Stormwater Section  
 Florida Department of Environmental Protection  
 2600 Blair Stone Road – MS2500  
 Tallahassee, FL 32399-2400

RE: Year 1 AR Cycle 3 Request for Additional Information – West Palm Beach  
 Initial Year 1 SOP Review and Comments – West Palm Beach

Dear Mr. Kuhl:

Below please find your request and the City's response for the Year 1 AR Cycle 3 review.

City of West Palm Beach

1. *Section VII, Part III.A.3 of the Annual Report form and Part III.A.3 of the permit require permittees to implement a litter control program for public streets, roads, and highways, including rights-of-way within the City's jurisdiction. Report the frequency, extent (e.g., square footage or road miles), and an estimate of the amount of litter collected during the reporting period. If activities required by this section of the Annual Report are not performed, explain why these activities were not performed and how the City plans to comply with this permit element during the current reporting period.*

Attached please find a copy of the City's Litter Control Program SOP, along with updated pages for the Annual Report Form documenting the litter control collection for the first year reporting period (March 2, 2011 – September 30, 2011).

Your comments on the submitted SOPs were:

<i>City of West Palm Beach</i>	<i>Neither SOP was approved</i>	<i>Part III.A.7.c and Part III.A.9.b</i>	<i>Inspection checklist lacks MSGP confirmation. Lacks construction inspection checklist</i>	<i>Part III.A.7.c, #5 and Part III.A.9.b, #3</i>
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In response, attached are a revised SOP for the Illicit inspection program, more specifically describing the documentation of the MSGP confirmation steps, and the inspection checklist

for the construction site inspection program.

Should you have any additional questions, please don't hesitate to contact me or the City directly.

Sincerely,

**Anne Capelli, Mock Roos**  
for the City of West Palm Beach

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

A. Permit Citation/S WMP Element	B. Permit Requirement/Quantifiable SWMP Activity				C. Number of Activities Performed	D. Documentation / Record	E. Entity Performing the Activity	F. Comments
	Ditches / conveyance swales (miles)	0				Software	Drainage	
	ATTACH explanation if any of the minimum inspection frequencies in Table II.A.1.a were <b>not</b> met							
	Year 1 ONLY: Attach a map of all known major outfalls as per Rule 62-624.600(2)(a), F.A.C.							
<b>Part III.A.2</b>	<b>Areas of New Development and Significant Redevelopment</b>							
	Report the number of new development and significant redevelopment projects reviewed by the permittee for post-development stormwater considerations.							
	<i>DEP Note: Please provide an explanation in Column F for any "0" reported in Column C. This provision DOES NOT APPLY to Indian Trail Improvement District (ITID), Northern Palm Beach County Improvement District (NPBCID), South Indian River Water Control District (SIRWCD), and FDOT.</i>							
	Significant redevelopment projects reviewed				0			
	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.							
	<i>DEP Note: Refer to Part III.A.2 of the permit for details regarding what the review entails, and what must be included in the summary report and follow-up report. Please provide the title of the attached report in Column D and the name of the entity who finalized the report in Column E. This provision DOES NOT APPLY to ITID, NPBCID, SIRWCD, and FDOT.</i>							
	Year 2 ONLY: Attach the summary report of the review activity							
	Year 4 ONLY: Attach the follow-up report on plan implementation							
<b>Part III.A.3</b>	<b>Roadways</b>							
	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.							
	<i>DEP Note: Please provide an explanation in Column F for any "0" reported in Column C. In addition, the permittee may choose its own units of measurement for the reporting items. Unit options for the amount of litter include: bags, cubic yards, pounds, tons. Unit options for the amount of area covered by the activity include: square feet, linear feet, yards, miles, acres. If all litter collection is performed by staff or by contractors, but not by both, please remove the non-applicable reporting items.</i>							
	PERMITTEE Litter Control Program: Frequency of litter collection				Daily	Daily Work Assignment Sheet Schedule	Park Maintenance	Litter is collected daily, locations varies by areas maintained

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	<b>PERMITEE Litter Control Program: Estimated amount of area maintained (linear feet)</b>	198,000	Maintenance Schedule	Parks Maintenance	Parks Maintenance removes litter as part of the right-of-way maintenance. Swales adjacent to private property <del>is</del> are the property owner's responsibility.
	<b>PERMITEE Litter Control Program: Estimated amount of litter collected (cubic yards)</b>	60	Solid Waste Authority Dump Tickets & Waste Management Invoice	Parks Maintenance Stormwater Drainage	
	<b>CONTRACTOR Litter Control Program: Frequency of litter collection</b>	0			
	<b>CONTRACTOR Litter Control Program: Estimated amount of area maintained (linear feet)</b>	0			
	<b>CONTRACTOR Litter Control Program: Estimated amount of litter collected (cubic yards)</b>	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.					
<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>					
	<b>Keep PBC Beautiful Trash Pick-up Events: Total miles cleaned</b>	0			
	<b>Keep PBC Beautiful Trash Pick-up Events: Estimated amount of litter collected (cubic yards)</b>	0			
	<b>Adopt-A-Road Program: Total miles cleaned</b>	0			
	<b>Adopt-A-Road Program: Estimated amount of litter collected (cubic yards)</b>	0			
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.					
<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>					
<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>					
	<b>Frequency of street sweeping</b>	Weekly	Street Sweeping Monthly Report	Public Works Streets Maintenance-Sweeper Division	712 miles swept weekly

## **City of West Palm Beach Litter Control Program**

The Litter Control Program for the City of West Palm Beach consists of:

- 37.5 miles of litter collection along public streets, roadways, and rights-of-way within our jurisdiction. (Zero miles of these streets, roadways, and rights-of-way are maintained by contract services.) A map of litter collection areas maintained by City of West Palm Beach is attached.
- The frequency of collection is:
  - Daily, but varies by location as shown on the map
- Documentation of volume of litter collected is kept in a log book by date and is summarized for reporting each year.
- All collected litter is properly disposed of at Solid Waste Authority.
- In accordance with City codes, litter control on many public streets, roadways, and rights-of-way is the responsibility of the adjacent property owner. If this activity is not carried out, Code Compliance officers follow routine procedures for notifying homeowners of their responsibility and follow-up to verify compliance.
- The City does not sustain an "Adopt-a-Road" program. Palm Beach County Solid Waste Authority (SWA) carries out an "Adopt-a-Spot" program, which may occur at locations within the City; however the City does not maintain information about that program. Information on this program is on the SWA website – [http://www.swa.org/site/illegal\\_dumping/adopt\\_a\\_spot.htm](http://www.swa.org/site/illegal_dumping/adopt_a_spot.htm)