

High Risk Facilities Inspection Program

Section III.A.8.a – Industrial and high Risk Runoff – Identification of Priorities and Procedures for Inspection

This permit element requires a written plan for **conducting inspections of high risk facilities** to determine compliance with all appropriate aspects of the stormwater program.

High Risk facilities have been defined as:

- Operating municipal landfills
- Hazardous waste treatment, storage, disposal and recovery facilities
- Facilities that are subject to EPCRS Title III, Section 313 (Toxics Release Inventory)
- 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.

High Risk Facility Written Program Components

1. An up-to-date inventory that includes the outfall location of each high risk facility and the surface water body into which the facility discharges
2. Procedure for prioritizing the inventory for inspection
3. Procedure for conducting site inspections (include checking for MSGP)
4. Procedure for addressing non-compliant discharges
5. Procedure for documenting the inspections and enforcement activities
(See form)
6. Identification of staff /department/outside entity responsible for inspections and for enforcement
7. Schedule for the training of inspectors
8. Description of resources allocated to implement this permit element

High Risk Facility Inventory and Inspection Program (Written Procedures)

1. An up-to-date inventory

The inventory is updated annually as follows:

- Hazardous Waste TSDR facilities are located using the EPA's envirofacts website (www.epa.gov/enviro/). **The envirofacts website search results indicate there are no TSDR facilities within the Town.**
- Facilities subject to EPCRA Title III, Section 313 are located using EPA's Toxic Release Inventory (www.epa.gov/tri). **The results of this search show there were no releases reported or otherwise released. Refer to the attached report.**
- FDEP's MSGP Database from FDEP's website, including the list of facilities holding a "Stormwater No Exposure Certificate". **The results show that there are no facilities within the Town.**
- Additional facilities are added as deemed appropriate during the proactive inspections for illicit discharges. **None.**

2. Procedure Prioritizing Facilities

Facilities that have had recent reported releases or that were added to the high risk facility inventory as a result of a pro-active inspection for illicit discharges are given top priority (Priority = 1). Facilities that are in the watershed that discharges to the Intracoastal Waterway will be given secondary priority (Priority = 2). The balance of the facilities (Priority = 3) will be inspected on a geographically mapped schedule. **No facilities are identified for proactive inspection for this reporting year.**

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

All High Risk facilities are inspected once within the Permit Term. Facilities that have been given a Priority 1 ranking are inspected annually. The High Risk facility Inspections are conducted one time per year. Inspection forms (see attached) are generated for the facilities to be inspected. Information available ahead of time is filled in before going into the field. At this time the facilities to be inspected are compared to the list of business types that require an MSGP. If a facility appears to be required to have coverage under an MSGP, it is noted on the inspection form and will be checked at the facility at the time of the inspection.

The inspector conducts an unannounced visit to the facility. A standardized inspection form is used to determine any stormwater non-compliance issue.

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

The Town shall notify the FDEP if a facility is identified within the MS4 that should have a MSGP but is not on the FDEP's listing.

5. Procedure for documenting the inspections and enforcement activities

(See Inspection Form)

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

The following staff members are responsible for the high risk facility inspections and enforcement activity.

| Name | Department |
|------------------|--------------|
| William Thrasher | Town Manager |
| Brian Dietrick | Town staff |
| | |

7. Schedule for Training Inspectors

Annual training is provided for individuals whose job responsibility it is to conduct high risk facility inspections. The training is concurrent with the training for the proactive illicit discharge inspection program.

8. Description of resources allocated to implement this permit element

Annually, no money is budgeted for this permit program because there are no High Risk facilities.

Town of Gulf Stream
High Risk Facility Inspection Form

Date of Inspection: _____

Name of Business or Owner: _____

Address of Facility: _____

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

Does type of business require an MSGP? Yes___ No___

 If yes, does this facility have one? Yes___ No___

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 elimination: _____

Date of referral to FDEP of facility that may require MSGP: _____