

Town of Lake Clarke Shores

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 – by zoning
2. Identified priority areas/facilities – existing commercial areas as there are no industrial areas
3. Annual schedule for inspections - annual
4. Procedure for conducting site inspections (include checking for the State of Florida **Multi-Sector Generic Permit** for Stormwater Discharge Associated with Industrial Activity MSGP) – N/A
5. Procedure for tracing source of discovered or suspected illicit discharge – see below
6. Procedure for eliminating the discharge – see below
7. Procedure for documenting the inspections and enforcement activities
(See form) – see below
8. Procedures for enforcement actions (or referrals to appropriate jurisdictional authority) – see below
9. Identification of staff /department/outside entity responsible for inspections and for enforcement – Utility Department with referrals to Code Enforcement, see below
10. Description of resources allocated to implement this permit element – as needed

Town of Lake Clarke Shores

Proactive Inspection Program (Written Procedures)

1. Procedure and Criteria for identifying priority areas/facilities

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

- Areas with older infrastructure
- Commercial, as there are no industrial or mixed use areas
- Areas with history of past illicit discharges and/or illegal dumping – N/A
- Areas with on-site sewage disposal systems - residential
- Areas upstream of sensitive or impaired water bodies

The attached map depicts the extent of our MS4 contributing area; the Town's zoning map depicts areas zoned commercial or mixed use; and areas with on-site septic systems were previously transmitted by the group applicant to DEP. "Older infrastructure" is not indicative of an increased potential to contain incidences of illicit discharges/connections/dumping.

2. List of identified priority areas/facilities (include checking for MSGP)

Priority proactive inspection areas are the commercial areas. As there are no industrial areas: the list of facility types associated with the FDEP MSGP Sectors is not applicable. **Each year facilities within the Town will be reviewed to determine the need for MSGPs.**

3. Annual schedule for inspections

All areas/facilities will be inspected at least once within the current permit term. If a facility or area is discovered to have illicit discharges/connections/dumping, it will be placed on the schedule for re-inspection the following year. The schedule for inspecting the priority areas/facilities is annually.

4. Procedure for conducting site inspections

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

If a problem is detected during a visit, contact is made with the owner or resident to investigate source.

6. Procedure for eliminating the discharge

Refer to Code enforcement any problem noted if not eliminated during the initial contact

7. Procedure for documenting the inspections and enforcement activities

See Inspection Form and Code Enforcement Officer duties and responsibilities in the Town's Code and Ordinances. Note the Code Enforcement Officer is also a Police Officer

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

In the Town's Codes and Ordinances

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

The Utility Department is responsible for the inspections for the NPDES permit with violations being referred to Code Enforcement/Police Officer. If unresolved the matter can go to the Code Enforcement Board.

10. Description of resources allocated to implement this permit element

The Utility Department has one person responsible for NPDES reporting with 3 trained personnel. The Town also has a Code Enforcement/Police Officer as part of the Police Department. Both devote time on an as needed basis

Proactive Illicit Discharge/Illegal Connection Inspection Form

Date of Inspection: _____

Address of Facility OR General Description of Area Inspected: _____

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 elimination: _____

Date of Referral to FDEP of facility that may require MSGP: N/A