

**Northern Palm Beach County Improvement District  
Standard Operational/Maintenance/Documentation Protocol  
Proactive Inspection Program**

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

Northern Palm Beach County Improvement District is an independent special district created pursuant to Chapter 59-994, Florida Statutes, and codified pursuant to Chapter 2000-467, Laws of Florida. Its purpose is to provide water management and infrastructure development services to properties in Northern Palm Beach County. Northern has no enforcement authority and reports any findings to local governing agencies. Northern has authority to inspect its easement's, tracts and right of ways

- **Procedure and Criteria for identifying priority areas/facilities**
  - For consistency with the Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) permit, the following areas are considered a priority in the inspection program:
    - 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
  
- **Annual schedule for inspections**
  - Entire stormwater system will be inspected at least once within the current permit term. If a facility or system is discovered to have illicit discharges/connections/dumping, it will be noted on Illicit tracking sheet
  - Check Florida Department of Environmental Protection (FDEP) list of facilities that have coverage under the 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.
  - 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. All appropriate field personnel receive illicit discharge and illegal dumping identification and notification training. If a suspected illicit is identified, it is reported to NPDES Coordinator and local government for investigation under the reactive investigations program. NPBCID has no enforcement authority and does not issue or inspect building permits
  - NPBCID has no enforcement authority and refer all finds to the local governing agency

- **Procedure for conducting inspections**
  - Contactors and Northern staff are trained annually using Excel videos on Illicit discharge detection
  - Pro- Active inspection are done while doing contracted maintenance activities
  - If any Illicit's are detected they are reported to Northern staff and referred to local governing agency
  
- **Procedure for tracing source of discovered illicit discharge**
  - Visual observation, investigation, and testing if necessary, are used to identify the source of an illicit discharges/connections/dumping.
  
- **Procedure for eliminating the discharge**
  - Contractors will report the discovery to NPBCID operations staff immediately
  - Northern staff will report findings to local governing agency
  - The owner is notified of the problem and asked to address the situation immediately. The owner is also notified of the re-inspection date, typically one week.
  
- **Procedure for documenting the inspections and enforcement activities**
  - Use Northern's NPDES Illicit Discharge Incident Tracking Sheet to enter information into the database and query for the yearend report
  - Contact local governing agency. NPBCID has no enforcement authority
  - The attached inspection form is used for pro-active inspections and the subsequent follow-up.
  - Photos' and any documentation will be scanned and entered in the Internal Database System(I.S.) under the appropriate unit of development
  
- **Procedures for enforcement actions (or referrals to appropriate jurisdictional authority)**
  - Refer to appropriate Local, State or Federal agency. NPBCID has no enforcement authority
  - Northern staff and contractors will report any incidents to the NPDES Coordinator
  
- **Identification of staff /department/outside entity responsible for inspections and for enforcement**
- Inspection activities are carried out by contractors or operation department employees. Follow-up and management are provided by NPDES Coordinator. Documentation is handled by the NPDES Coordinator.
  
- **Description of resources allocated to implement this permit element**
  - No additional staff or budget is allocated

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Proactive Illicit Discharge/Illegal Connection Inspection Form**

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: \_\_\_\_\_