

SHEET 3

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 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

The attached map depicts the extent of our MS4 contributing area. The Town of South Palm Beach is a completely built out residential condominium community on the barrier island in Palm Beach County. The Town does not have any old infrastructure or industrial, commercial, or mixed use areas. There is no history of past illicit discharges and/or illegal dumping in the MS4 system. All property in the Town is connected to the central sewer system with flow being sent to a regional treatment facility. Any storm water runoff from the Town does not enter an impaired water body.

2. List of identified priority areas/facilities

The Town does not have any priority areas/facilities.

3. Annual schedule for inspections

The Town's MS4 area/facility will be inspected at least twice each year. If the facility is discovered to have illicit discharges/connections/dumping the issue will be acted upon to eliminate the problem. Also, since this MS4 is located at Town hall/Police Station the area is under visual surveillance by employees and 24 hour camera surveillance should discourage any illicit discharges/connections or dumping.

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

See item 3 above.

5. Procedure for tracing source of discovered illicit discharge

We will use the camera surveillance record to discover the source'

6. Procedure for eliminating the discharge

We will contact the offending party to eliminate the source.

7. Procedure for documenting the inspections and enforcement activities

(See Inspection Form)

We will use the camera surveillance record and the police incident report.

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

The Police Department will operate as Code Enforcement. If compliance is not achieved the matter will go before the Town's Code Enforcement Board for action.

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

The Town's Building Official performs routine inspections and the Police Department and Code Enforcement Board would be used for enforcement.

10. Description of resources allocated to implement this permit element

No additional funds needed at this time.

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: _____

If Facility inspection, 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:

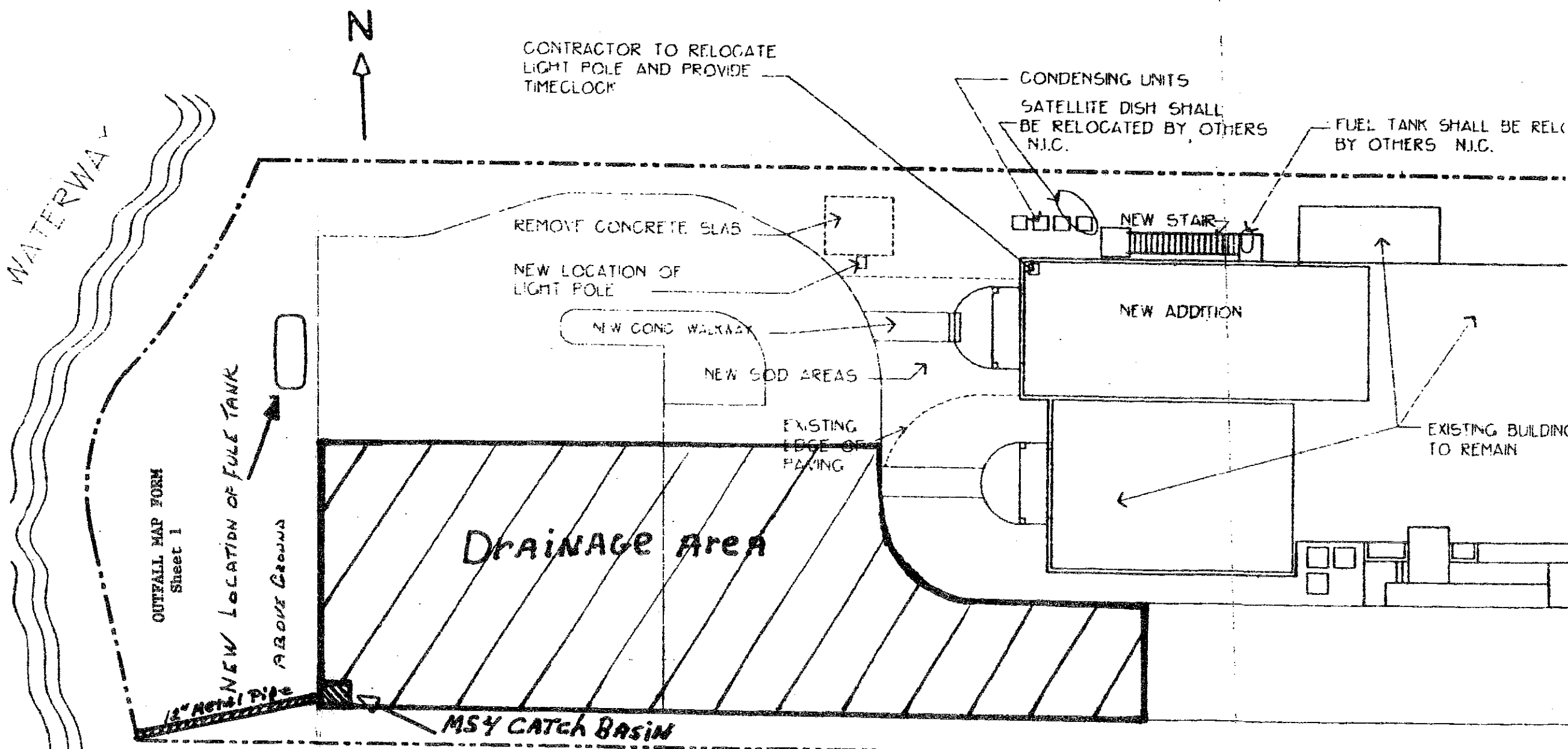
Type of Enforcement Action Taken: _____

Date to verify elimination: _____

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

Section III.A.7.c Proactive Inspection of Illicit Discharges

The Town of South Palm Beach has only one MS4 discharge point which is located at the rear of the Town Hall property. It drains approximately one third of the rear parking lot and is located in such a position that it would be impossible for someone else to make a physical connection to the catch basin. Its location also makes it very difficult for someone to physically dispose of any illicit product into the catch basin undetected. There are no industrial, or mixed uses in the Town, and the only commercial land use is a hotel that does not have access to the MS4 discharge point. In addition, because the Town Hall serves as the Police Station the MS4 area is under visual surveillance by employees coming and going, and is monitored by a 24 hour recorded security camera.



Town of South Palm Beach
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1 SITE PLAN

1" = 20'-0"