



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Jonathan P. Steverson  
Secretary

## Phase I Municipal Separate Storm Sewer System (MS4) NPDES Stormwater Audit Report

### I. BACKGROUND INFORMATION

**MS4 Permit Name:** Palm Beach County  
**Permittee:** City of Delray Beach  
**Permit Number:** FLS000018 (Cycle 3)  
**Annual Report Year:** Year 4  
**Reporting Period:** 10/01/2013 – 09/30/2014  
**Audit Date/Time:** June 10, 2015 10:30 am – 11:45 am

#### Inspector(s):

| Name          | Title                    | Phone/ Email   |
|---------------|--------------------------|--|
| Michelle Bull | Environmental Consultant | <a href="mailto:Michelle.Bull@dep.state.fl.us">Michelle.Bull@dep.state.fl.us</a><br>(850) 245-7561 |

#### Permittee Representative(s):

| Name             | Title                        | Phone  |
|------------------|------------------------------|--|
| Alan Wertepny    | Program Manager<br>Mock-Roos | (561) 683-3113 x 231<br><a href="mailto:alan.wertepny@mockroos.com">alan.wertepny@mockroos.com</a> |
| Isaac Kovner     | City Engineer                | (561) 243-7341<br><a href="mailto:kovner@mydelraybeach.com">kovner@mydelraybeach.com</a>           |
| Mike Lopushinsky | Stormwater Administrator     | (561) 243-7298<br><a href="mailto:lopushinsky@mydelraybeach.com">lopushinsky@mydelraybeach.com</a> |

### II. GENERAL COMMENTS

RAI response received during the audit, which includes all SOPs.  
Population of 60,000 which fluctuates, 16 square miles. Older town. Bordered by Military Trail and C-15 Canal. Lots of restaurants, galleries, shops. Covers main and Barrier Island. FDOT bridges.

### III. SITE VISITS

Satisfactory                       Unsatisfactory                       Not Applicable

### IV. SWMP IMPLEMENTATION REVIEW

#### Fiscal Analysis

Satisfactory                       Unsatisfactory                       Not Applicable

### Part III.A.1: Structural Controls and Stormwater Collection Systems Operation

Satisfactory                       Unsatisfactory                       Not Applicable

**Structural Control Inventory:** Swale inventory may change due to new swales installed. No Dry retention, 22 Dry Detention, 1 Wet Detention.

**Structural Control Inspections:** Minimum inspection frequencies for the permit cycle have not been met for exfiltration trenches, grass treatment swales, dry detention, pollution control boxes (required to quarterly), major outfalls, MS4 pipes and inlets/catch basins.

**Exfiltration trench:** Inspected during inlet inspections. The City owns a CCTV truck; however, system was not inspected due to issues with the truck. Staff are now using a mobile pole TV, have a plan to inspect all structures.

**Grass treatment swales:** Inspected visually by City employees. Swales are maintained by contractors, mowing and litter collection. Contractors report maintenance to city employees. The Department suggests updating the SOP to include zones mowed as inspection activities and tracking.

**Pollution Control Boxes:** Discussed counting scheduled maintenance as inspections.

**Major outfall:** inspected more than 90% in Year 4. Will continue to inspect 100% annually.

**Pipes/ Inlets:** See Exfiltration trench inspections. Will review vac truck records to confirm % inspected.

**Other:** If inspections cannot be done in house, will contract duties (RFP). Also planning to zone the city. Recently performed a rate study to have money to perform duties. The City provided a copy of a proposal for visual assessment of the MS4 by a consultant.

**SOPs:** reviewed.

**Required Improvements:** Inspect 100% of exfiltration trenches and treatment swales; 50% of pipes and inlets before permit expiration March 1, 2016.

### Part III.A.2: Areas of New Development and Significant Redevelopment

Satisfactory                       Unsatisfactory                       Not Applicable

### Part III.A.3: Roadways

Satisfactory                       Unsatisfactory                       Not Applicable

**Litter Control:** Did not report an estimated amount of litter collected. Will maintain dump tickets for City Parks maintenance staff. Will include tracking in future contracts.

**Street Sweeping:** Two sweepers, one for the road, one for parking lots. Revised sweeping numbers provided with RAI response.

**Road Maintenance Yards:** Environmental Services Department (ESD) Facility should be reported. Contains fleet maintenance garage, sweeper, CCTV, vac storage. No car wash, fleet vehicles are rinsed. Discussed needing a car wash station. No stormwater treatment on site.

**SOP:** work orders, areas maintained.

**Required Improvements:** During the audit, it was stated that there is no car wash area; however, the SOP discusses a vehicle/washing area. Investigate fleet washing activities.

### Part III.A.4: Flood Control Projects

Satisfactory                       Unsatisfactory                       Not Applicable

**Projects without stormwater treatment:** Mistake in reporting. No flood control projects performed.

**Part III.A.5: Municipal Waste Treatment, Storage, and Disposal Facilities  
Not Covered by an NPDES Stormwater Permit**

- Satisfactory                       Unsatisfactory                       Not Applicable

**Waste Storage Facilities:** Waste services are contracted for city.  
SOP reviewed; included an inspection checklist for two roll offs, and stated that site inspections are conducted annually. Please continue to report on annual report.

**Part III.A.6: Pesticides, Herbicides, and Fertilizer Application**

- Satisfactory                       Unsatisfactory                       Not Applicable

SOP reviewed; discussed GIBMP and annual training, and maintaining licenses/certification.

**Part III.A.7.a: Illicit Discharges and Improper Disposal —  
Inspections, Ordinances, and Enforcement Measures**

- Satisfactory                       Unsatisfactory                       Not Applicable

**Part III.A.7.c: Illicit Discharges and Improper Disposal —  
Investigation of Suspected Illicit Discharges and/or Improper Disposal**

- Satisfactory                       Unsatisfactory                       Not Applicable

**Proactive Inspection SOP:** Reviewed.  
Prioritization: MSGP  
Schedule: once per permit term  
Inspections: part of industrial pretreatment program (IPP); unannounced, drive-around; checklist included; staff and training discussed;  
Tracing: procedures listed; verbal notification, SWP, follow up  
Documentation: City file  
Enforcement: written warning after verbal notification

**Reactive Inspection SOP:** Reviewed; similar to Proactive SOP, includes checklist.

**Part III.A.7.d: Illicit Discharges and Improper Disposal —  
Spill Prevention and Response**

- Satisfactory                       Unsatisfactory                       Not Applicable

**Part III.A.7.e: Illicit Discharges and Improper Disposal —  
Public Reporting**

- Satisfactory                       Unsatisfactory                       Not Applicable

**Part III.A.7.f: Illicit Discharges and Improper Disposal —  
Oils, Toxics, and Household Hazardous Waste Control**

- Satisfactory                       Unsatisfactory                       Not Applicable

**Part III.A.7.g: Illicit Discharges and Improper Disposal —  
Limitation of Sanitary Sewer Seepage**

Satisfactory                       Unsatisfactory                       Not Applicable

**SOP:** Reviewed; discussed IPP. SOP does not discuss maintenance or preventative actions for the sanitary collection system. Please ensure that the City has SSO response procedures.

**Part III.A.8.a: Industrial and High-Risk Runoff —  
Identification of Priorities and Procedures for Inspections**

Satisfactory                       Unsatisfactory                       Not Applicable

**SOP:** Reviewed; prioritized facilities, listed staff to perform inspections, included Proactive ID checklist.

**Part III.A.8.b: Industrial and High-Risk Runoff —  
Monitoring for High Risk Industries**

Satisfactory                       Unsatisfactory                       Not Applicable

**Part III.A.9.a: Construction Site Runoff —  
Site Planning and Non-Structural and Structural Best Management Practices**

Satisfactory                       Unsatisfactory                       Not Applicable

**Part III.A.9.b: Construction Site Runoff —  
Inspection and Enforcement**

Satisfactory                       Unsatisfactory                       Not Applicable

**SOP:** Reviewed.

Timing: before, during (weekly and/or after 0.5"rain events) and at end of construction.

Prioritization: all sites that discharge into the MS4.

Inspections: done by Environmental Services Construction; attached inspection checklist, documentation in files and database.

Enforcement: verbal or stop work order.

**Part III.A.9.c: Construction Site Runoff —  
Site Operator Training**

Satisfactory                       Unsatisfactory                       Not Applicable

**Inspector E&SC Training:** City inspectors have FSA SW Level 1 operator training. Mike, Administrator has Level 2 operator training.

**Site Plan Reviewer Training:** Tracy-attended NPBCID refresher training; and Ralph.

**Site Operator Training:** Discussed training requirements. Preconstruction meetings held with 7 city and 18 private project operators for NPDES requirements.

**Required Improvements:** In future annual reports, report site operator training, and site plan review refresher training.