



City of Lake Worth Beach

March 13, 2020

Ms. Michelle Bull
MS4 Coordinator
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ref. No. B9028.00
Subject: Phase I Municipal Separate Storm Sewer System (MS4) NPDES Stormwater Audit
Report Permittee: City of Lake Worth Permit Number: FLS000018 (Cycle 3)

PROJECT NAME: NPDES Stormwater Audit Response

PROJECT LOCATION: City of Lake Worth Beach
1820 2nd Ave North
Lake Worth Beach, FL 33460.

We are in receipt of the Department of Environmental Protection Audit Report based on the Audit date of June 20, 2017 2:10 pm – 5:00 pm for the subject project. Please find below each of the comments with our response in **Bold** lettering.

SITE VISITS

Municipal Maintenance Yard

1. During the inspection, one storm drain had a sheen. A pallet of used engine parts was stored uncovered. The trash dumpster had 2 open paint cans. Two 55-gallon metal drums with chemicals were uncovered, and the tops were rusting, and 5-gal buckets with silicone were damaged.

Response: The Stormdrain has been cleaned, engine parts 55-gallon drums and 5-gallon pails have been disposed or put under cover. Please see photos 1 and 2 in the Appendix of this report.

2. Required Improvements: Within 30 days of the audit report, confirm the following housekeeping procedures are in place. Update inspection checklist as needed.

- Engine parts that may still have chemicals are stored under cover.
- Dispose of trash in dumpster, not construction bin.
- Keep trash dumpster covered.
- Store waste chemicals under cover, in a bermed area, or dispose.

- Periodically clean litter from yard.

Response: The inspection check list has been updated please see attached form in Appendix B, engine parts and chemicals have been moved and are stored under cover. Dumpster has been moved to be undercover, litter is being policed on a bi-weekly schedule.

SWMP IMPLEMENTATION REVIEW

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

1. Reported 46 outfalls, which includes major and non-major. Discussed updating the inventory and reporting major outfalls in future annual report.

Response: With in Appendix C, you will find a revised map of outfalls being inspected. We are continuing to work on the evaluation of the outfalls and will submit a updated summary with the next annual report.

2. Within 30 days of the audit report, submit an updated Standard Operating Procedure to include the current inspection tracking process. In the future annual report, update and submit the major outfall inventory.

Response: A revised Standard Operating Procedure has been implemented; at each outfall the checklist is used to evaluate the conditions results are recorded in the also attached tracking spreadsheet.

Part III.A.3: Roadways

1. In future reporting periods annual inspect and report the roll off site. In future reporting periods, use separate inspection checklists for the City facilities.

Response: Roll-offs are now being recorded see attachment in Appendix D, current record of roll-off transfers and associated inspections forms.

Sincerely,
City of Lake Worth Beach

Judy Love
Water Sewer Storm Administrator
Utilities Department

DJC: ADW: tsm

Appendix A:

Photos of Corrective Actions



Engine parts have part have been cleaned up or stored under cover



Engine parts have part have been cleaned up or stored under cover



Dumper has been empty and is only used for short term storage,
long term waste storage in cover commercial dumper now.



Yard has and waste chemicals have been cleend up or stored under cover.

Ms. Michelle Bull

March 13, 2020

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Yard has been cleaned up and is maintained this way

Appendix B:

Revised Inspection Form

Equipment Yard/Maintenance Shop Inspection Form

Facility: _____ Date of Inspection: _____

Address: _____

If site discharges to MS4, provide: Latitude/Longitude of discharge point: _____

and receiving water body: _____

YES NO N/A

- | | | | |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Materials/chemicals are stored, handled, and discarded in a manner to reduce the potential risk of spills entering the MS4 |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | A spill kit is on site |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Outfalls, inlets, and outlets of stormwater treatment systems are free of debris/pollutants |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Storage tanks are clearly marked, properly contained, and protected from potential damage |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Loading, unloading, and transfer areas are neat and free of spills/debris/pollutants |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Vehicle maintenance areas are properly maintained and draining to the treatment system or sanitary sewer line |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Outdoor manufacturing areas are properly maintained and free of spills or debris |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Outdoor stockpile/material handling areas are properly maintained, and the materials are properly contained (i.e., no potential to leak or leach pollutants) |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Trash and debris areas are conspicuous and properly protected from stormwater runoff |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Fueling stations are free of petroleum product spills/leaks |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Vehicle wash and rinse areas are draining to the treatment system or sanitary sewer line |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The site was free of any visual indication of potential illicit connection/illicit discharge to the MS4. If no, note type of indication:

Odor <input type="checkbox"/> Color <input type="checkbox"/> Foam <input type="checkbox"/> Sheen <input type="checkbox"/> Surface Scum <input type="checkbox"/> Solids <input type="checkbox"/> Turbidity <input type="checkbox"/> |

INDUSTRIAL SITES ONLY

- | | | | |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | MSGP Notice of Intent (FDEP Form 62-621.300(5)(b)) was submitted to DEP |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Stormwater Pollution Prevention Plan was on site and implemented, per the MSGP |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Required SWPPP inspection and maintenance report forms completed, per the MSGP |

Use reverse side of form for comments.

Major Stormwater Outfalls – Structural Control Inspection Standard Operational/Maintenance/Documentation Protocol

There are 46 major stormwater outfalls (MSWOs) that are part of our MS4. A MSWO is defined as:

- an outfall pipe larger than 36-inch inside diameter (or its equivalent), OR
- discharge from a single conveyance other than a pipe that serves a drainage area of 50 acres or more, OR
- an outfall pipe larger than 12-inches inside diameter (or its equivalent) that serves a drainage area containing industrial land uses, OR
- discharge from a single conveyance other than a pipe that serves a drainage area of 2 acres or more than include industrial land uses.

The MSOWs within our MS4 are located on the following map.

Inspections:

MSWOs are inspected annually, or more frequently if historic operations indicate that it's needed for a particular MSWO. Inspections are conducted in accordance with the following Structural Control Inspection Form.

The anticipated inspection schedule follows.

[List the Major Stormwater Outfalls as listed in the attached outfall survey and map]

Maintenance:

There are several maintenance activities that may be associated with MSWOs. The appropriate activity is chosen to correspond to the reported condition. The following activities may be required:

1. Remove trash and debris and dispose of properly.
2. Remove accumulated vegetative matter and dispose of properly.
3. Remove accumulated sediment and dispose of properly.
4. Maintain earthen bank adjacent to the discharge pipe or headwall.
5. Maintain the headwall at the outfall, if applicable.
6. Repair/replace pipe if needed.

Documentation:

The documentation for the inspection and maintenance activities related to major stormwater outfalls is to visit each outfall annually and to complete the outfall survey, currently using a Major Stormwater Outfalls – Structural Control Inspection Form. These forms are transferred to the City of Lake Worth Beach Outfall Survey and forms are retained until the start of the next permit cycle.

Major Stormwater Outfalls – Structural Control Inspection

Facility ID: _____

Date: _____

FUNCTION:

Debris or sediment accumulation in pipe? YES NO

Barnacle accumulation in pipe? YES NO

Sediment accumulation in receiving water? YES NO

Pipe in need of repair/replacement? YES NO

If YES, report to supervisor for further investigation or schedule for maintenance.

GENERAL:

Any indications of illicit discharge or illegal dumping? YES NO

If YES, describe and report to supervisor for proper response: _____

Signs of erosion on bank near outfall? YES NO

Rip-rap in need of maintenance? YES NO

Headwall in need of repair/replacement? YES NO

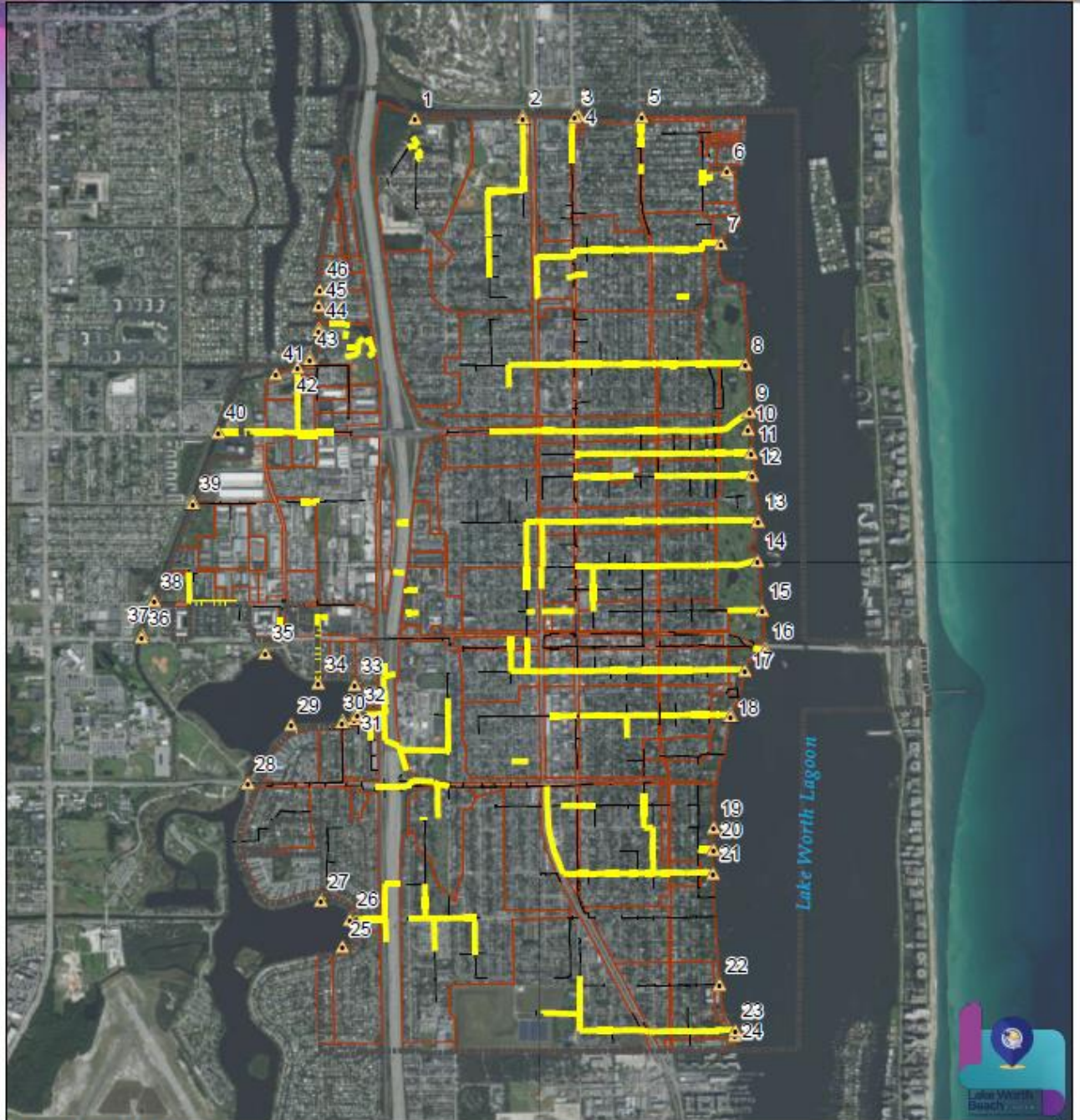
If YES, schedule for maintenance.

Appendix C:

Map of Revised Outfalls

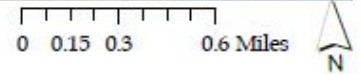


Major Stormwater Outfall Locations City of Lake Worth Beach, FL



Map Legend

- Outfall Structures
- Pipes
- Pipes - 36" or Greater
- Drainage Area (20101202)



Created: March 11, 2020
Source: City of Lake Worth Beach, FL

Appendix D:

Waste Records



Power Sweeping • Debris Removal • Hauling

20533 Biscayne Blvd, Suite 443 • Aventura, Florida 33180

Telephone: (305) 345-5889 • **Fax:** (800) 590-6291

E-mail: info@ussweepinginc.com

www.ussweepinginc.com

City of Lake Worth
October 2018

1st cycle

<u>District</u>	<u>Yards</u>
District 2	49
District 3	21
District 4	16
District 1	12
Total	98

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	47
District 3	31
District 4	22
District 1	17
Total	117



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City of Lake Worth
November 2018

1st cycle

<u>District</u>	<u>Yards</u>
District 2	51
District 3	32
District 4	14
District 1	16
Total	113

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	53
District 3	29
District 4	16
District 1	26
Total	124



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City of Lake Worth
December 2018

1st cycle

<u>District</u>	<u>Yards</u>
District 2	33
District 3	46
District 4	30
District 1	45
Total	154



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City of Lake Worth

Jan 2019

1st cycle

<u>District</u>	<u>Yards</u>
District 2	39
District 3	41
District 4	26
District 1	35
Total	141

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	47
District 3	31
District 4	32
District 1	41
Total	151



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City of Lake Worth

Feb 2019

1st cycle

<u>District</u>	<u>Yards</u>
District 2	41
District 3	43
District 4	29
District 1	32
Total	145

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	46
District 3	34
District 4	41
District 1	38
Total	159



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City of Lake Worth
March 2019

1st cycle

<u>District</u>	<u>Yards</u>
District 2	68
District 3	48
District 4	53
District 1	41
Total	210

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	72
District 3	41
District 4	34
District 1	51
Total	198



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City of Lake Worth

April 2019

1st cycle

<u>District</u>	<u>Yards</u>
District 2	103
District 3	46
District 4	22
District 1	148
Total	319

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	97
District 3	88
District 4	63
District 1	149
Total	397



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City of Lake Worth

May 2019

1st cycle

<u>District</u>	<u>Yards</u>
District 2	51
District 3	20
District 4	26
District 1	64
Total	137

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	38
District 3	29
District 4	30
District 1	41
Total	138



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City of Lake Worth

June 2019

1st cycle

<u>District</u>	<u>Yards</u>
District 2	27
District 3	31
District 4	16
District 1	21
Total	95

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	38
District 3	24
District 4	28
District 1	33
Total	123



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City of Lake Worth

July 2019

1st cycle

<u>District</u>	<u>Yards</u>
District 2	40
District 3	24
District 4	26
District 1	19
Total	109

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	41
District 3	33
District 4	21
District 1	41
Total	136



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City of Lake Worth
August 2019

1st cycle

<u>District</u>	<u>Yards</u>
District 2	45
District 3	27
District 4	17
District 1	31
Total	120

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	49
District 3	23
District 4	27
District 1	39
Total	138



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City of Lake Worth
September 2019

1st cycle

<u>District</u>	<u>Yards</u>
District 2	68
District 3	43
District 4	36
District 1	29
Total	176

2nd cycle

<u>District</u>	<u>Yards</u>
District 2	51
District 3	26
District 4	29
District 1	33
Total	139

Appendix E:

Report From FDEP



FLORIDA DEPARTMENT OF Environmental Protection

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

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

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

I. BACKGROUND INFORMATION

MS4 Permit Name: Palm Beach County MS4
Permittee: City of Lake Worth
Permit Number: FLS000018 (Cycle 3)
Annual Report Year: Year 6
Reporting Period: 09/2015 – 09/2016
Audit Date/Time: June 20, 2017 2:10 pm – 5:00 pm

Inspector(s):

Name	Title	Phone/ Email
Michelle Bull	MS4 Coordinator	(850) 245-7561 Michelle.Bull@dep.state.fl.us

Permittee Representative(s):

Name	Title	Phone
Jamie Brown	Public Services Director	(561) 586-1720 jbrown@lakeworth.org
Judy Love	Water Utilities Water Sewer Supervisor	(561) 586-1719 jlove@lakeworth.org
Felipe Lofaso	Public Services Assistant Director	(561) 586-1720 flofaso@lakeworth.org
Eric Polacek	Water Utilities Financial Budget Analyst	(561) 236-9767 epolacek@lakeworth.org
Alan Wertepny	Mock-Roos MS4 PBC Coordinator	(561) 683-3113 alan.wertepny@mockroos.com

II. GENERAL COMMENTS

The City is approximately seven square miles with 116 miles of roadway. The area is on a ridge that drains well. The City provides water, sewer and power to residents. The City has done multiple energy-saving activities, including upgraded lighting to LED in City offices and street lights. The City has also installed a solar farm at the closed landfill. The farm will provide 2% of the City's energy, and the City has plans to add more solar panels in the future.

The City had recently undergone a reorganization. Street sweeping is handled by Public Services. Inspections and maintenance is performed by Water/Sewer.

III. SITE VISITS

Satisfactory Unsatisfactory Not Applicable

Site Type: Municipal Maintenance Yard

Site Name and Location: Public Services Department – Fleet Maintenance Yard

Applicable Permit Provision(s): Part III.A.3

Observations: The facility has a maintenance garage, including two fueling stations, a roll off for used tires, a roll off for C&D debris, a trash dumpster, and a grass lot for old equipment. The parking lot was recently repaved and looked well maintained. The maintenance shop was covered.

During the inspection, one storm drain had a sheen. A pallet of used engine parts was stored uncovered. The trash dumpster had 2 open paint cans. Two 55-gallon metal drums with chemicals were uncovered, and the tops were rusting, and 5-gal buckets with silicone were damaged.



Required Improvements: Within 30 days of the audit report, confirm the following housekeeping procedures are in place. Update inspection checklist as needed.

- Engine parts that may still have chemicals are stored under cover.
- Dispose of trash in dumpster, not construction bin.
- Keep trash dumpster covered.
- Store waste chemicals under cover, in a bermed area, or dispose.
- Periodically clean litter from yard.

IV. SWMP IMPLEMENTATION REVIEW

Monitoring Program

Satisfactory Unsatisfactory Not Applicable

Not reviewed during audit.

Fiscal Analysis

Not reviewed during audit.

TMDL Prioritization

Satisfactory Unsatisfactory Not Applicable

TMDL Prioritization Plan: Approved. No TMDL implementation required.

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

Satisfactory Unsatisfactory Not Applicable

Major Outfall Inventory: Reported 46 outfalls, which includes major and non-major. Discussed updating the inventory and reporting major outfalls in future annual report.

Structural Control Inspections: Staff changes caused different tracking in Year 6. In Year 6, dry retention, exfiltration trenches and the pump station were inspected quarterly by Felipe Lofaso and mowed by a contractor. Discussed cleaning high trash area more often.

Grass treatment swales, wet detention system, pollution control boxes (Suntree Technologies-last structure before an outfall), weir and ditches were inspected monthly by Felipe Lofaso. When structures needed to be cleaned, inspector reported to the Stormwater section to be cleaned within the week.

Catch Basins: The City is divided into four districts with neighborhood associations. Catch basins discharge to large outfalls. Neighborhoods are inspected and the number of structures for each neighborhood is known. Inspection reports not available.

The City was moving to a new tracking process including GIS with picture capabilities. Judy Love has had some stormwater pipes TV'd and installed Tideflex check valves at two outfalls to prevent flooding from Spring/King tides. Staff are planning on adding more pollution control boxes upstream of outfalls over the next few years. Staff have attended FW&PCOA voluntary Stormwater Operator Certification training.

Required Improvements: Within 30 days of the audit report, submit an updated Standard Operating Procedure to include the current inspection tracking process. In the future annual report, update and submit the major outfall inventory.

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

Satisfactory Unsatisfactory Not Applicable

Since the 1970's, the City has required development to retain first one inch of rain before discharging.

Part III.A.3: Roadways

Satisfactory Unsatisfactory Not Applicable

Litter Control: Reviewed the weekly log of debris measured by five-gallon bucket collected by the groundskeeper and vegetation maintenance staff. Litter and sweeping debris is stored in a roll off and taken to the transfer station weekly.

Street Sweeping: Reviewed tipping tickets and sweeper logs. Sweeping of the entire City was increased to twice a month. The City was approved to purchase a mechanical sweeper for parking lots, etc. to supplement the sweeping contract. US Sweeping dumps sweeping debris to two City roll offs. Year 6 included internal sweeping.

Road Maintenance Yards: Garage with heavy equipment, fueling and vehicle maintenance. Streets yard stores excavator, pumps, sweepers (now contracted), waste vehicles (garbage trucks) and stockpile millings. Inspections showed needed maintenance April and August.

Required Improvements: In future reporting periods annual inspect and report the roll off site. In future reporting periods, use separate inspection checklists for the City facilities.

Part III.A.4: Flood Control Projects

Satisfactory Unsatisfactory Not Applicable

Checking drains before rain to prevent flooding issues. Have some flooding issues.

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

Satisfactory Unsatisfactory Not Applicable

Not reviewed during audit.

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

Satisfactory Unsatisfactory Not Applicable

Not reviewed during audit.

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

Satisfactory Unsatisfactory Not Applicable

Not reviewed during audit.

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

Satisfactory Unsatisfactory Not Applicable

Proactive Inspections: Inspections are performed during structural inspections by Felipe Lofaso. See Part III.A.1. The City also maintains a list of all commercial business that have a potential to impact the MS4 and perform windshield inspections of some facilities annually. Discussed doing proactive inspections during Fat-Oil-Grease (FOG) inspections.

Reactive Inspections: See Part III.A.7.e

Training: Felipe Lofaso was not trained during reporting year. Previous Supervisor was trained, but left position. Discussed providing education to facilities as needed.

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

Satisfactory Unsatisfactory Not Applicable

Spills: Reported five gas leaks due to contractor work. Discussed not reporting incidents that do not have the potential to impact the MS4.

Training: Fire Department.

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

Satisfactory Unsatisfactory Not Applicable

Website/Phone: Public Services number. Website has a “report a roadway issue” section.

Public Education: Have a FOG flier.

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

Satisfactory Unsatisfactory Not Applicable

Solid Waste department: County

Public Education: Website refers to County.

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

Satisfactory Unsatisfactory Not Applicable

Not reviewed during audit.

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

Satisfactory Unsatisfactory Not Applicable

High risk facilities: Staff in attendance could not locate the High-Risk Facility list. Since the audit, the City has developed a HRF list and performs inspections.

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

Satisfactory Unsatisfactory Not Applicable

Monitoring: See above.

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

Satisfactory Unsatisfactory Not Applicable

Site Plan Review: Building Department reviews permits. Review checklist includes CGP and ERP permit and SWPPP review. The City has ordinances for inspections and require copies of permits. Reviewed site plans for 3 city projects.

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

Satisfactory Unsatisfactory Not Applicable

Inspections: Policy Manual requires Public Services to inspect for structures. Reviewed inspection checklists, very thorough.

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

Satisfactory Unsatisfactory Not Applicable

Not reviewed during audit.