



FLORIDA DEPARTMENT OF Environmental Protection

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Sent via ePost

February 14, 2020

Terrance Bailey
Public Works Director
1481 W 15th St
Riviera Beach, FL 33404

Subject: Palm Beach County Municipal Separate Storm Sewer System (MS4)
NPDES Permit ID Number: FLS000018-004
**City of Riviera Beach Year 1 Audit Report
Request for Additional Information (RAI)**

Dear Mr. Bailey:

Thank you for your response to the Cycle 4 Year 1 Audit Report submitted on September 11, 2018. A review of your supporting documentation indicates the response to the audit report is **incomplete**.

In response to the Cycle 4 Year 1 audit conducted June 7, 2018 and report sent July 26, 2018, the City submitted two versions of Standard Operating Procedures (SOPs). The first version submitted appeared to be based on FDOT SOPs, which were not appropriate for City activities. The second packet of SOPs submitted September 11, 2018 appears to be based on templates provided by the Palm Beach County MS4 joint program; however, many were missing key elements, including staff responsible for the activity, map/inventory of structures and facilities, and specific procedures. In the audit report, various documentation and all SOPs were required to be submitted. Since the permittee has submitted annual reports since the latest review, Year 1 annual report revision requests are not addressed in this RAI. See notes below for required improvements to SOPs or relevant documents requested and not provided.
Please submit the requested information by the Year 3 annual report due date, March 31, 2019.

Structural Control Inventory: The number of structures has changed significantly between Year 1 and Year 3. **Submit an explanation for the change in reported inventory for each structure, including major outfalls.**

Structural Control SOPs: Each SOP contains procedures to conduct maintenance and procedures to document and track inspections and maintenance (checklists and work orders). There are maps and inspection checklists for most structures. **Revise and submit the SOPs to correct the following deficiencies:**

- No inventories were submitted for any structures. **Submit an inventory (list with location, size, material, receiving waterbody, etc.) for each type of structure, including major outfalls.**
- Detention, retention and exfiltration maps appear to include a service area, not a specific structure. **Submit a revised map to show these structures.**
- Procedures to schedule and conduct inspections do not include specific information such as the department doing work and how inspections are scheduled. Many SOPs do not specify an inspection frequency. **Revise and submit the SOPs to include who performs work, and how inspections are scheduled.**
- Pipes/Catch basins: no maintenance activity was included for pipe cleaning. A visual inspection list was included. The SOP stated that recording of inspections was done by marking on a paper map which sections of pipe were inspected. **Revise and submit the SOP to include how pipes will be cleaned (vacuuming, etc.) and a sample of how inspections are tracked/documented.**
- Control Structures were not distinguishable on the map, no inventory (noted above). **Submit a revised map of control structures (weir, etc.)**

Litter Control SOP:

- Includes map and schedule for sweeping, not litter control. **Submit a map and schedule for litter control.**
- Does not include procedures for litter control. **Revise and submit the SOP to include staff/department that perform work and how work is scheduled (before mowing, etc.)**

Street Sweeping SOP:

- Does not include where sweeping debris is stored. Maintenance Shop/Equipment Yard SOP also does not mention the sweeping debris roll off. **Revise and submit the SOP to include where/how debris is stored and disposed of.**
- The FSA load reduction calculator has been updated. **Revise and submit the SOP to reference the updated FSA tool.** <https://floridadep.gov/water/stormwater/content/guidance-and-web-links>

Maintenance Shop/Equipment Yard SOP:

- Does not include a list of equipment yards and maintenance shops. **Revise and submit the SOP to include Public Works facility and other relevant facilities.**
- SOP includes multiple activities but does not specify which activities take place at the Public Works facility. **Revise and submit the SOP to include relevant activities at City facilities.**
- There was no inspection checklist or inspection schedule. Sites are required to be inspected annually. **Submit an inspection checklist and revised SOP with schedule and staff/department that perform inspections.**

Pesticide Application Minimization SOP: Includes licensing and training for staff but does not include application minimization procedures. **Revise and submit the SOP to include the requirements on page 43 of the permit for application of pesticides and fertilizers.**

Proactive Illicit Discharge Inspection SOP: Includes a checklist and priority areas but does not include procedures for tracing and eliminating discharges, documentation, enforcement, staff/department responsible, and resources. **Revise and submit the SOP to include a list of priority areas/facilities and the requirements on pages 47-48 of the permit, bullets 5-10.**

Spill Response SOP: Not submitted. **Submit a spill response SOP.**

Limitation of Sanitary Sewer SOP: Not submitted. **Submit a sanitary sewer overflow (SSO) response SOP.**

High Risk Facility Inventory: Not submitted **Submit the current inventory of high-risk facilities.**

High Risk Facility SOP: Did not include procedures for addressing illicit discharges or resources. **Revise and submit SOP to include procedures for addressing illicit discharge to the MS4 and a description of resource allocated to implement the program.**

If you have any questions, please contact Michelle Bull at 850-245-7561, Michelle.Bull@floridadep.gov or Steve Cioccia at 850-245-8568, Stephen.Cioccia@floridadep.gov.

Sincerely,



Michelle Bull
NPDES Stormwater Program
MB/sac

Cc: Alan Wertepny, Mock, Roos & Associates, Inc.
Sedrick Clark, City of Riviera Beach
Borja Crane-Amores, FDEP
Steve Cioccia, FDEP