



FLORIDA DEPARTMENT OF Environmental Protection

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

Rick Scott
Governor

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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
Permittee: City of Riviera Beach
Permit Number: FLS000018 (Cycle 4)
Annual Report Year: Year 1
Reporting Period: 10/01/2016 – 09/30/2017
Audit Date/Time: June 7, 2018 1:00 pm – 5:00 pm

Inspector(s):

Name	Title	Phone/ Email
Michelle Bull	Environmental Consultant	850-245-7561 Michelle.Bull@dep.state.fl.us

Permittee Representative(s):

Name	Title	Phone
Malcolm Sommons	Operations Manager	561-707-9669 msommons@rivierabch.com
Richard Labinsky	City Engineer	561-845-4080 rlabinsky@rivierabch.com
Sedric Clarke	Interim Stormwater Manger	561-840-3119 sclarke@rivierabch.com
Alan Wertepny	Mock-Roos	561-683-3113 x 231 alan.wertepny@mockroos.com

II. GENERAL COMMENTS

The City is not fully implementing the requirements of the NPDES Stormwater Permit authorized by the federal Clean Water Act. We are concerned that regionally-significant water resources, important to your citizens, are not being protected. This reality is public information and may become apparent to your citizens or environmental interest groups statewide. Failure to meet the requirements of the NPDES MS4 permit may result in the initiation of enforcement procedures by the Department.

The Department discussed the need to have more coordination between city departments to meet the requirements of the permit, and to gather information for annual reports. Discussed reviewing SOPs and inspection checklists for all permit elements. An SOP package was submitted after the audit; however, it was incomplete.

Summary of permittee: Population 35,000; 8 sq miles. The City has more commercial and industrial areas than residential. Port, business associated with rail line. 2 major watersheds to the C-17 Canal and the

Intracoastal Waterway. Stormwater Division came from Streets and Canals and Utilities departments. Have a Stormwater Utility Fee. Stormwater Master Plan: four roadway redevelopment projects at \$30 million. Seal sewer lines, eliminate outfalls by increasing drainage to exfiltration trenches. Discussed reporting these items in the Assessment Plan.

Required Improvements: **Within 30 days of the audit report**, submit all SOPs required by the permit. Alternately, submit a plan for developing the SOPs.

III. SITE VISITS

Satisfactory Unsatisfactory Not Applicable

IV. SWMP IMPLEMENTATION REVIEW

Monitoring Program

Satisfactory Unsatisfactory Not Applicable

The Assessment Plan submitted is approved.

Fiscal Analysis

Not discussed during audit.

TMDL Prioritization

Satisfactory Unsatisfactory Not Applicable

TMDL Prioritization Plan: Do not discharge to a TMDL WBID.

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

Satisfactory **Unsatisfactory** Not Applicable

Major Outfall Inventory: Annual report included a copy of a map. The City is reporting 14 major outfalls, but there may be fewer.

Structural Control Inventory:

Canals: sections of canal that discharge to Waters of the State.

Structural Control Inspections: Most of the inspection paperwork was lost during a recent move due to asbestos contamination.

Catch Basins: crew inspects in zones. Reviewed inspection records, which include cleaning the top of the grates. Discussed providing checklists to crews for each zone. Sedric schedules vac truck twice a week based on inspection reports.

Required Improvements:

- **Within 30 days of the audit report**, confirm the number of major outfalls, including for industrial zoned areas. Submit a map and inventory with outfall ID, size, and receiving waterbody.
- **Within 30 days of the audit report**, submit an inventory of stormwater treatment systems including retention/detention systems, exfiltration, canals.

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

Satisfactory Unsatisfactory Not Applicable

Projects: not reported. Reviewed by Engineering Department. Rely on ERP requirements.

Required Improvements: **Within 30 days of the audit report**, submit a revised annual report page to report the number of development projects reviewed and approved in Year 1.

Part III.A.3: Roadways

Satisfactory Unsatisfactory Not Applicable

Litter Control: comments refer to sweeping. Streets and Grounds does litter control store debris in roll-off that is emptied 2-3 times per week by Waste Management.

Pick Up Events: Recommend using Solid Waste Authority website to track information.

Street Sweeping: Have 1 street sweeper, sweeping daily. Reviewed Zone map, which includes sq miles of sweeping. Recommend updating map to highlight streets with curb and gutter. Using mileage counter to report. Between 5-7 mph. Sweeping and vac truck debris taking to ECR (East Central Regional WWTP, City of West Palm Beach), measuring weight of truck.

Road Maintenance Yards: Public Works: Sweeping debris roll off, fueling, fleet maintenance, wash area with gravel floor. Public Works inspects.

Required Improvements:

- **Within 30 days of the audit report**, submit an SOP for litter control, including a zone map, frequency, and how amount collected is tracked.
- In future annual reports, report the amount collected of sweeping in cubic yards or tons, and use the FSA calculator to calculate Total Nitrogen and Total Phosphorus.

Part III.A.4: Flood Control Projects

Satisfactory Unsatisfactory Not Applicable

Not discussed during audit.

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

Satisfactory Unsatisfactory Not Applicable

Not discussed during audit.

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

Satisfactory Unsatisfactory Not Applicable

Not discussed during audit.

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

Satisfactory Unsatisfactory Not Applicable

Not discussed 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

SOP: Cycle 3 includes inspecting priority (industrial) facilities/areas.

Proactive Inspections: Reported monthly. Discussed illicit discharge inspections and training stormwater field crews.

Training: Recommend training all stormwater field staff on illicit discharge detection.

Required Improvements: Evaluate the proactive illicit discharge inspection SOP. If changes are made, submit for DEP review and approval. In future annual reports, report the number of proactive inspections.

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

Satisfactory Unsatisfactory Not Applicable

Spills: Reported 0. Discussed contacting Fire Department to report spills that may impact MS4.

Training: Recommend training fleet maintenance staff and other field crews that handle chemicals.

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

Satisfactory Unsatisfactory Not Applicable

Public Education: door hangers to residents, brochures at offices.

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

Satisfactory Unsatisfactory Not Applicable

Public Education: See above for public education.

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

Satisfactory Unsatisfactory Not Applicable

Spills: Discussed requiring the Utility Department to contact public Works for spills into the MS4.

Prevention: lining pipes, replacing sections of pipe, upgraded pump station. Independent utility district.

Required Improvements:

- **Within 30 days of the audit report**, submit a revised annual report page to include the SSO prevention activities.
- **Within 30 days of the audit report**, submit sanitary sewer overflow (SSO) response SOP.

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

Satisfactory Unsatisfactory Not Applicable

High risk facilities: 4

Inspections: 0

Required Improvements: **Within 30 days of the audit report**, submit a list of the high-risk facilities, and inspections. Alternately, submit a plan for developing a list of high risk facilities and an inspection plan.

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

Satisfactory Unsatisfactory Not Applicable

Monitoring: Not reported

Required Improvements: **Within 30 days of the audit report**, submit a revised annual report page with the number of high risk facilities monitored/sampled.

**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: Engineering Department (Rick) reviews plans for drainage, grading, connections to MS4, erosion and sediment control. May have reported a private project as a permittee project.

ERP/CGP Coverage: City requires ERP or waiver as a condition of the permit, and notifies of CGP.

Required Improvements:

- **Within 30 days of the audit report**, submit a revised annual report page with the number of permittee and private permit applications reviewed and approved in Year 1.

- **Within 30 days of the audit report**, submit a revised annual report page with the number of ERP/CGP notifications and coverage confirmed. Alternately, submit an SOP of the site plan review process which includes notification and confirmation ERP/CGP coverage.
- In future reports, report the number of sites with ERP/GCP notification and confirmation.

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

Satisfactory Unsatisfactory Not Applicable

Inspections: Reported one permittee site. The Mediterranean residential neighborhood construction began during reporting period. May have reported a private project as a permittee project. City roadway project: City engineers check for CGP during inspections.

Required Improvements: **Within 30 days of the audit report**, confirm number of active permittee and private construction sites.

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

Satisfactory Unsatisfactory Not Applicable

Inspector E&SC Training: required to have DEP cert
Sent stormwater and Streets and Grounds staff to ESC in Year 2.

Site Plan Reviewer Training: not reported

Site Operator Training: not reported. 1 permittee site (need to confirm, see Part III.A.9.b)

Required Improvements: **Within 30 days of the audit report**, submit a plan for construction site inspector to attend an Erosion and Sediment Control course and attend annual refresher training, site plan reviewer to attend annual refresher training, and train/report operator outreach (pre-construction, construction site inspection, etc.).