



FLORIDA DEPARTMENT OF Environmental Protection

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

I. BACKGROUND INFORMATION

MS4 Permit Name: Florida Department of Transportation (FDOT) – District 4
Permittee: Palm Beach County (FLS000018), Broward County (FLS000016)
Annual Report Year: Cycle 3: Years 1-5
Audit Date/Time: June 14, 2016 8:00 am – 12:15 pm

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II. GENERAL COMMENTS

The group had an in-depth discussion of TMDL prioritization and bacteria indicator testing.

In follow-up discussions and emails, FDOT answered all questions relating to inconsistencies between structural control inventories and inspections. Staff explained inspection scheduling, ongoing inventory updates, and inspections by multiple entities. DEP has approved in this report less frequent inspections of pollution control boxes and major outfalls.

III. SITE VISITS

Satisfactory Unsatisfactory Not Applicable

IV. SWMP IMPLEMENTATION REVIEW

Monitoring Program

Satisfactory Unsatisfactory Not Applicable

Fiscal Analysis

Not discussed at audit.

TMDL Prioritization

Satisfactory Unsatisfactory Not Applicable

Palm Beach: Northern Palm Beach County Improvement District submitted a TMDL Prioritization Report for all Palm Beach County MS4 co-permittees. FDOT does not discharge to the prioritized WBID 3233 L8 Canal, which has an EPA TMDL for Turbidity.

Broward: FDOT prioritized WBID 3279A North Fork Snake Creek for Fecal Coliform. FDOT with Cooper City, the Town of Davie and the Town of Southwest Ranches completed an ambient monitoring plan to verify the fecal coliform impairment. FDOT submitted a BPCP November 19, 2013, which was approved July 18, 2014.

FDOT also discharges into WBID 3271 Pompano Canal, for nutrients (Chlorophyll a). Broward County's monitoring showed that the waterbody is no longer impaired.

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

Satisfactory Unsatisfactory Not Applicable

Major Outfall Inventory: Submitted in Year 1.

Structural Control Inventory: Updated as needed. E Sciences is reviewing all plans to update the inventory of exfiltration trenches and major outfalls. Inspection schedules are created at the beginning of a reporting year, and the number of inspections may not match the inventory because new structures found based on plan reviews or structure discoveries are being added to the inventory regularly.

Structural Control Inspections:

Maintenance Management System (MMS)-maintenance

Maintenance Rating Program (MRP)-inspections

Inspections (by E Sciences, Inc.) and maintenance (MMS) are reported separately. Discussed the challenge of reporting percent inspected because inventory, inspections and maintenance are tracked by number of structures and acres. Asset maintenance covers all maintenance, cleaning and repair.

Maintenance is contracted by acre based on cycle or performance, different contracts for specific areas. FDOT performs MRP auditing.

Alternate Inspection Schedule: FDOT provided historical inspections records for Cycle 3 inspections of pollution control boxes and major stormwater outfalls in Broward and Palm Beach counties. DEP approves the alternate inspection schedule for the following:

Pollution Control Boxes that have been inspected three consecutive quarters with no maintenance required can be inspected alternately (forego the fourth quarter inspection). If no maintenance is needed the first quarter inspected after the skipped quarter, the pollution control box will remain on the alternate schedule (i.e., skip a quarter). If maintenance is needed the first quarter inspected after the skipped

quarter, the pollution control box will revert to the standard (quarterly) inspection schedule until there are three consecutive quarters in which no maintenance is required.

Major Outfalls that have been inspected three consecutive years with no maintenance required can be inspected alternately (inspected every other year). If no maintenance is needed the first year inspected after the skipped year, the major outfall will remain on the alternate schedule (i.e., skip a year). If maintenance is needed the first year inspected after the skipped year, the major outfall will revert to the standard (annual) inspection schedule until there are three consecutive year in which no maintenance is required.

Reference this audit report in future annual reports where alternate inspection schedules are reported.

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

Satisfactory Unsatisfactory Not Applicable

Not discussed during audit.

Part III.A.3: Roadways

Satisfactory Unsatisfactory Not Applicable

Litter Control: FDOT District 4 has three operation centers – Broward, Palm Beach and Treasure Coast (Martin, St. Lucie, Indian River counties). Each operation center contracts Asset Maintenance (litter, sweeping, inspections) or individual contracts for specific duties.

Example roads with asset maintenance: SR-5, I-75 I-95, AIA, SR-710

Pick Up Events: Adopt-A-Road segments are coordinated by each operation center. DEP reviewed report, which lists organization, miles, and pounds of trash collected.

Road Maintenance Yards: Each operation center has a maintenance facility; all are inspected annually. Annual inspections and reports are very thorough, and include a checklist, narrative and images.

Part III.A.4: Flood Control Projects

Satisfactory Unsatisfactory Not Applicable

FDOT has a five-year work program which includes flood control and large roadway projects. Flood control retrofit projects reported are small projects, which are handled by Drainage Department. Broward County Year 4 example: trench drain installed for flooding across driveway.

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: District 4 does not own or operate municipal waste facilities.

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

Satisfactory Unsatisfactory Not Applicable

FDACS License: Operation center staff and all approved contractors hold FDACS licenses.

GIBMP Certification: N/A. No FDOT staff apply fertilizer. One contractor is certified.

Fertilizer Ordinance: Not Applicable to FDOT.

Public Education: Not Applicable to FDOT.

**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

SOP: Submitted in Cycle 3 Year 1.

Proactive Inspections: Performed during MRP structural inspections. FDOT MRP inspectors have illicit discharge training. E Sciences, Inc. staff also perform inspections and have the FDOT illicit discharge training.

Reactive Inspections: Performed by operations center staff.

Enforcement: Referred to respective County.

Training: Using the online FDOT illicit discharge training. FDOT is receiving more reports of illicit discharges from field staff, so it appears the training is working. FDOT business cards have operation center phone numbers for reporting. The District also shows the Excal *Ground Control* videos to 200+ field staff. Reported preconstruction training where environmental concerns are discussed. Some contractors view FDOT illicit discharge training video. Considering requiring illicit discharge training in future contracts. In the meantime, internal procedures are being updated to require training.

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

Satisfactory Unsatisfactory Not Applicable

Training: Reported FDOT video and presentation, and HAZMAT training. See Part III.A.7.c above.

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

Satisfactory Unsatisfactory Not Applicable

DCP: Discharge Connection Permits (DCP) issued include a flyer with the complaint number and other important numbers. Each operation center has a citizen complaint number. Phone numbers are also posted FDOT's website and Palm Beach County's Stormwater and Me website.

Public Education: Not Applicable to FDOT.

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

Satisfactory Unsatisfactory Not Applicable

DCP flyer includes contact information for Solid Waste Authority, Broward County, and waste management company.

Public Education: Not Applicable to FDOT.

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

Satisfactory Unsatisfactory Not Applicable

Spills: None reported to FDOT District 4. Broward County would report sanitary sewer overflows (SSOs) to FDOT if there was a spill into an FDOT MS4.

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

Satisfactory Unsatisfactory Not Applicable

Palm Beach: Includes toxic release inventory (TRI) facility within 1000 feet of right-of-way. E Sciences, Inc. inspects facilities; mostly finding offsite tracking of sediments from concrete batch plants. Reviewed the very thorough inspection report and analysis of list.

Broward: The County maintains inventory and inspects facilities and reports to District 4.

**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

Site Plan Review: DCPs issued out of operation centers. DCP includes confirming that the project has stormwater treatment; FDOT must accept previous run off from vacant land.

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

Satisfactory Unsatisfactory Not Applicable

Inspections: Construction inspections are performed by operations center staff and tracked in Permit Information Tracker (PITS). Projects may include small projects (Ch 1486 projects in FDOT ROW or that have potential to discharge into ROW). Asset Maintenance contractors also inspect construction sites. FDOT Construction: District Construction Environmental Coordinator inspects all District 4 projects at least three times. Coordinator performs pre-construction meetings, permit confirmation and Stormwater Pollution Prevention Plan review. Reviewed inspection reports.

Enforcement: Staff can stop a FDOT project if failures are found. Report private projects to DEP or South Florida Water Management District as needed.

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

Satisfactory Unsatisfactory Not Applicable

Site Operator Training: Reported FDOT contracted operators as private.