

*Attachment 1*

**‘Responses’  
to the  
Florida Department of Environmental Protection (FDEP)  
NPDES MS4 2020 Cycle 4 Year 3 Audit  
of the  
Town of Cloud Lake NPDES Stormwater Permitting Program**

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**C4Y3 Audit:** Cloud Lake

**SWMP Element SOPs Required to be Submitted for the Audit** *[where required by the MS4 permittees permit].*

1. Part III.A.1 - Structural Controls & Stormwater Collection Systems Operation- **Response:** Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Cloud Lake ARF, pages 28- 50 of 113.
2. Part III.A.3 - Roadways, Litter Control- **Response:** Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Cloud Lake ARF, pages 54 of 113.
3. Part III.A.5 Municipal Waste Treatment, Storage, and Disposal Facilities – **Response:** Not Applicable (NA).
4. Part III.A.6 - Pesticides, Herbicides, and Fertilizer Application- **Response:** Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Cloud Lake ARF, page 57 of 113.
5. Part III.A.7.c - Inspection and Investigation of Suspected Illicit Discharges and/or Improper Disposal (Incl. SOP for Training)-**Response:** Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Cloud Lake ARF, pages 58-62 of 113 for Proactive Inspection Program; pages 63-65 of 113 for Reactive Program; page 66 of 113 for Spill Prevention and Response Training Plan; and page 67 of 113 for Plan to Eliminate Wastewater Contamination in Stormwater.
6. Part III.A.8 – Industrial and High-Risk Runoff Facilities – **Response:** NA

7. Part III.A.9.a, b & c - Construction Site Runoff- **Response:** Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Cloud Lake ARF, page 68 & 69 of 113 for Construction Site Inspection Plan; and page 70 of 113 for Joint Training Program.

**Inspection Records/Documentation Required to be Submitted for the C4Y3 Audit (AR Section VII):**

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

- A. Current map and inventory of all major outfalls. **Response:** The current map and inventory are located on the pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Cloud Lake ARF, pages 51 & 52 of 113.
- B. Documentation of completed structural control inspections and maintenance activities performed during the reporting period. **Response to B, i and ii:** Refer to pbco-npdes.org website, Annual Reporting, C4Y3, Individual ARFs, Cloud Lake ARF, pages 4 & 5 of 28; and/or the ‘Town of Cloud Lake October 1, 2018 to September 30, 2019 Year 3 Cycle 4 FY 18/19 Log’, simply referred hereafter as the FY 18/19 Log, Part III.A.1. Structural Controls, pages 32-46 of 106 . **Response to B iii:** Not Applicable (no estimates; all represent ‘actual’ inspection and maintenance activities). **Response to B iv:** Refer to pbco-npdes.org website, Annual Reporting, C4Y3, Individual ARFs, Cloud Lake ARF, page 5 of 28.
- C. Samples of documentation of completed structural control inspections performed during the reporting year. **Response:** Refer to Attached FY 18/19 Log Part III.A.1 Structural Controls, pages 32-46 of 106 for all applicable structural controls in Cloud Lake.

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

- A. Submit a listing and description of the projects of new/redevelopment projects reviewed. **Response:** One (1) new single-family residence located at 107 E. Chandler Road reported. Refer to pbco-npdes.org website, Annual Reporting, C4Y3, Individual ARFs, Cloud Lake, page 6 of 28.

**3. Part III.A.3 – Roadways: Litter Control, Street sweeping, Equipment Yards, and Maintenance:**

- i. Submit documentation/logs of litter collection performed during the reporting year. **Response:** Refer to Attached FY 18/19 Log, Part III.A.3. Roadways (Monthly Inspection Sheets), pages 50 -65 of 106.
- ii. Submit documentation/logs of street sweeping performed during the reporting year. **Response:** Not Applicable (NA).

4. **Part III.A.4 – Flood Control Projects:** Submit a listing & description of Flood control projects completed during the reporting period. **Response:** NA.

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

A. Submit documentation (checklist/inspection report) for each inspection conducted for each facility reported. **Response:** NA.

6.

**Part III.A.6 – Pesticides, Herbicides, and Fertilizer Application: Copies of applicable FDACS licenses for permittee personnel which are public applicators of pesticides/herbicides**

A. Documentation (FDACS licenses) for permittee personnel which are public applicators of pesticides/herbicides. **Response:** Refer to Attachment II for the licenses.

B. Submit documentation (GIBMP) for permittee personnel which are applicators of fertilizer. **Response:** Refer to Attachment II for the licenses.

C. Submit documentation (FDACS licenses) for permittee personnel which are certified/licensed applicators of fertilizer. **Response:** Refer to Attachment II for the licenses.

D. If the permittee operates one or more golf courses, confirm the courses are operated in a manner that is consistent with the appropriate manual and submit the responsible operator's contact information. **Response:** NA.

7. **Part III.A.7. - Illicit Discharges and Improper Disposal**

a. Submit a complete and current copy of legal authority to conduct inspections, conduct monitoring, control illicit discharges, illicit connections, illegal dumping and spills into the MS4 and to require compliance with conditions in ordinances, permits, contracts, and orders; including the legal authority to take legal action to eliminate illicit discharges or connections. **Response:** The complete and current legal authority is available on the pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Cloud Lake ARF, pages 71-77 of 113.

b. Submit a listing & description of all Proactive inspections performed during the reporting period to include: name of facility, location(s), dates of investigations, type of incident, findings (indication of illicit discharge, connection, dumping) whether incident was resolved/date resolved and type of enforcement action taken). **Response:** Refer to FY 18/19 Log, Part III.A.1. Structural Controls, 47 & 48 of 106 and Part III.A.3 Roadways

**(Monthly Inspection Sheets), pages 50-65 of 106.**

- c. Submit copies of a sample of the SOP checklist/standard form/report for Proactive inspections performed during the reporting period. **Response: Refer to the pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Cloud Lake ARF, pages 58-62 of 113.**
  - d. Above copies in c. must include all inspections where illicit Discharges and/or improper Disposal was found or where enforcement action was taken. **Response: NA.**
  - e. Submit a listing & description of all Reactive inspections performed during the reporting period, to include: name of facility, location(s), date(s) of investigation(s), type of incident, findings (indication of illicit discharge, connection, dumping), whether incident was resolved/date resolved and type of enforcement taken. **Response: NA.**
  - f. Submit copies of a sample of documentation of the Reactive inspections. **Response: NA.**
  - g. Above copies in f. must include all inspections where Illicit Discharges and/or Improper Disposal was found or where enforcement action was taken. **Response: NA.**
  - h. Submit documentation (e.g. training attendance roster, training completion certificate, etc.) of the number of permittee personnel and contractors who identify and report conditions in the stormwater system that may indicate the presence of illicit discharges/connections/dumping of the MS4, trained within the reporting year (both in-house and outside training) **Response: Illicit Discharge Training provided through the PBC MS4 Steering Committee. Refer to pbco-npdes.org website, Group/Joint Activities- Training- Excal Visual Video Training, Attendance logs, March 20, 2019 Sign-In-Sheet, #61, Jack Horniman.**
  - i. Submit the agenda or description of content of the annual training for permittee and contractors who identify and report conditions in the stormwater system. **Response: Refer to pbco-npdes.org website, Meetings and Minutes, Meeting Minutes Archive, 2019, March 20.**
  - j. Submit documentation to verify the number of spills responded to during the reporting. **Response: NA**
8. **Part III.A.8.a. - Industrial and High-Risk Runoff, Identification of Priorities and Procedures for Inspections.**
- A. Submit a list of HRF reported in the AR. **Response: NA**
  - B. Submit documentation for the number of HRF inspections reported. **Response: NA.**

**Part III.A.8.b – Industrial High-Risk Monitoring for High-Risk Industries.**

A. Submit documentation for the number of HRF sampled. **Response: NA**

**9. Part III.A.9.a - Construction Site Runoff, Site Planning and Non-Structural and Structural BMPs:**

- a. Submit a complete copy of the current local codes, land development regulations or other legal authority document(s) that require the use and maintenance of appropriate structural and non-structural erosion, sedimentation and waste controls during construction to reduce the discharge of pollutants to the MS4. **Response: 1) Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Cloud Lake ARF, page 53 of 113; 2) , refer to Municode, Florida, Cloud Lake, Part II, Ch. 28, ZONING, Sec. 28-1, Short Title (legal authority), Sec. 28-12 Site Plan Review, specifically, (b) Pre-Application Meeting and (c) Application Contents, paragraphs (6), (11), (12), (13), (16) and (17); and 3) Attachment III, Infrastructure Element of the Town of Cloud Lake Comprehensive Plan (legal authority pursuant to Ch. 163, F.S. ‘Community Planning Act’), with particular reference to OBJECTIVE A. Policy 1 (level of service standards), OBJECTIVE C. Policy 2 (basic drainage policy), OBJECTIVE E., Policies1-3 (stormwater regulations and BMPs); and, OBJECTIVE F, Policy 2. (Florida Friendly landscaping).**
- b. A list of 1) permittee site plan review approvals reported and 2) private site plan review approvals. **Response: Refer to pbco-npdes.org. website, Annual Reporting, C4Y3 Individual ARFs, Cloud Lake ARF, pages 16 of 28.**
- c. Submit a description of the process to notify permit applicants of the need to obtain all required stormwater permits. **Response: Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Cloud Lake ARF, page 53 of 113.**
- d. Submit a description of the process to confirm ERG and CGP coverage has been obtained, as applicable, prior to commencement of any land grading, excavation or clearing. **Response: Refer to pbco-npdes.org website, Annual Reporting, C3Y2 Individual ARFs, Cloud Lake ARF, page 53 of 113.**

**10. Part III.A.9.b - Construction Site Runoff, Inspection and Enforcement.**

- a. ‘PERMITTEE’ active construction sites reported in AR. **Response: NA.**
- b. ‘PRIVATE’ active construction sites reported in AR. **Response: NA.**

**11. Part III.A.9.c - Construction Site Runoff, Site Operator Training:**

- a. Submit documentation of E&SC construction site inspector qualification/certification for the permittee’s construction site inspectors identified in the AR. **Response: Refer to Attachment IV**

**Stormwater Management Inspection Certification for Jack Horniman.**

b. Submit documentation of annual training. **Response: Refer to pbco-npdes.org website, Group/Joint Activities, Training, Excal Visual Video Training, Attendance logs, March 20, 2019, Sign-In-Sheet, #61, Jack Horniman.**