

**‘Responses’
to the
Florida Department of Environmental Protection
NPDES MS4 2020 Cycle 4 Year 3 Audit
of the
Town of Haverhill NPDES MS4 Permitting Program**

C4Y3 Audit: Town of Haverhill

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, Town of Haverhill ARF, pages 22- 38 of 45.
2. Part III.A.3 - Roadways, Litter Control- **Response:** Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Town of Haverhill ARF, page 39 of 45.
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, Town of Haverhill ARF, page 44 of 45.

Part III.A.7.c - Inspection and Investigation of Suspected Illicit Discharges and/or Improper Disposal (Incl. SOP for Training)-**Response:** See Attachment 1 for Proactive Inspection Program; Refer to pbco-npdes.org website, Annual Reporting, C3Y2, Individual ARFs, Town of Haverhill ARF page 40 of 45 for Spill Prevention and Response Plan; and page 25 of 45 for Spill Prevention and Response Procedures. Refer to Refer to pbco-npdes.org website, Sign-in Sheet for March 20, 2019 Joint Training Program – Joe Roche (TOH) and Karen Brandon (AECOM).

5. Part III.A.8 – Industrial and High-Risk Runoff Facilities – **Response:** NA

7. Part III.A.9.a, b and c - Construction Site Runoff- **Response: See Attachment 2; and refer to pbco-npdes.org website, Sign-in Sheet for March 20, 2019 Joint Training Program – Joe Roche (TOH) and Karen Brandon (AECOM).**

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:** See Attachment 2.
 - B. Documentation of completed structural control inspections and maintenance activities performed during the reporting period. **Response to B, i and ii:** Refer to Attachment 3 for Structural Control Inspection forms and Attachment 4 for Inlet Inspection Forms. **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, Town of Haverhill 4 of 28.
 - C. Samples of documentation of completed structural control inspections performed during the reporting year. **Response:** Refer to Attachment 3.

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:** NA

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 Attachment 5 Trash Pickup.
 - ii. Submit documentation/logs of street sweeping performed during the reporting year. **Response:** Refer to Attachment 6 – Street Sweeping docs.

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.

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 7 for the license.**
- B. Submit documentation (GIBMP) for permittee personnel which are applicators of fertilizer. **Response: NA** Submit documentation (FDACS licenses) for permittee personnel which are certified/licensed applicators of fertilizer. **Response: NA**
- C. 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 and is included as Attachment 11.**
- 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 Attachment 8.**
- c. Submit copies of a sample of the SOP checklist/standard form/report for Proactive inspections performed during the reporting period. **Response: See Attachment 8.**
- 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 and 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, Joe Roche (TOH) and Karen Brandon (AECOM).**
- 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 Attachment 9 Chapter 50 Stormwater Code and Attachment 10 – Code & Land development Regulation Review Report (11/16/2012).**
- b. A list of 1) permittee site plan review approvals reported and 2) private site plan review approvals. **Response: NA**
- c. Submit a description of the process to notify permit applicants of the need to obtain all required stormwater permits. **Response: Joe Roche (TOH) notified applicants of the need to obtain required SFWMD ERPs or FDEP CGPs.**
- 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: The TOH requests copies of the permits prior to commencement of construction.**

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: No new inspectors were certified during the report year.**
- 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, Joe Roche (TOH) and Karen Brandon (AECOM).**