

Part III.A.7.c

Town of Palm Beach MS4 NPDES Program Proactive Illicit Discharge Program

1. Procedure and Criteria for identifying priority areas/facilities

For consistency with the Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) permit, the following areas are considered a priority in the inspection program:

- Industrial, commercial, or mixed use areas
- Areas with history of past illicit discharges and/or illegal dumping
- Areas with on-site sewage disposal systems
- Areas upstream of sensitive or impaired water bodies

2. Annual schedule for inspections

All priority areas/facilities are inspected at least once annually during the term of the current five-year permit term.

In addition, inspections for signs of illicit discharges are part of the Standard Operating Procedure for all structural control inspections and maintenance. A “checkbox” for this activity is included on the inspection forms for those activities.

If a suspected illicit is identified, it is reported to the Department of Public Works for investigation under the Reactive Investigations program.

The field inspections are the primary responsibility of Department of Public Works, Water Resources Division. The pro-active inspections that take place during the inspection of structural controls and other MS4 components, is the responsibility of of Department of Public Works, Water Resources Division. Inspections are carried out throughout the year.

3. Procedure for conducting inspections

The inspector(s) patrols the prioritized area searching for indications of illicit discharges/connections/dumping into the Town's MS4, in accordance with the training received. If any are identified, the inspector makes a cursory attempt at identifying the source of the illicit. If the source is identified, the inspector makes the decision to either approach the facility owner or refer the finding to his supervisor for further action. In speaking with the facility owner or operator, the inspector advises of the findings and cites the ordinance which prohibits such discharges . The inspector uses

photo documentation to support the inspection. The inspector indicates his/her intention to return to verify that the problem has been corrected.

If no source is identified, the findings are reported to the inspector's supervisor for further investigation.

The pro-active inspections that take place during the inspection of structural controls and other MS4 components, is the responsibility of Department of Public Works, Water Resources Division . Inspections are carried out throughout the year.

4. Procedure for tracing source of discovered illicit discharge

Visual observation, investigation, and testing if necessary, are used to identify the source of an illicit discharges/connections/dumping.

5. Procedure for eliminating the discharge

If an illicit connection to the MS4 through a pipe is identified, the owner of the property is contacted by the Department of Public Works, Water Resources Division . The owner is notified of the problem and asked to address the situation immediately. The owner is also notified of the re-inspection date, typically one week.

6. Procedure for documenting the inspections and enforcement activities

The attached inspection form is used for pro-active inspections and the subsequent follow-up. Photo documentation will also be provided, as needed. Selected activity related to the pro-active inspection program is logged into a database for management. The electronic files facilitate follow-up, referrals and year-end summarizing.

7. Procedures for enforcement actions (or referrals to appropriate jurisdictional authority)

For cases within the Town of Palm Beach's MS4 contributing area, an unresolved matter is handled by the code compliance division. Code compliance assigns a case number and follows through to resolution. For cases outside Town of Palm Beach 's MS4, the appropriate entity is notified (FDOT, Palm Beach County, etc.) by the Department of Public Works, Water Resources Division .

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**Town of Palm Beach
Proactive Illicit Discharge/Illegal Connection
Inspection Form**

Date of Inspection: _____ Inspector Name: _____

- New Inspection Follow-up Inspection

Address _____

Identification of MS4 component that could receive discharge from this site/area: _____

Findings:

Evidence of illicit connections to storm sewer? Yes___ No___

Evidence of dumping/spills to storm sewer? Yes___ No___

Evidence of wash water going to storm sewer? Yes___ No___

Storage tanks leaking or improperly contained? Yes___ No___

Stockpiles/debris piles uncontained? Yes___ No___

If "yes," to any above, describe:

Type of Enforcement Action Taken: _____

Date to verify correction: _____