



*"The Capital City of the Palm Beaches"*

**DEPARTMENT OF PUBLIC UTILITIES**

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September 11, 2013

Mr. Allen P. Hubbard, P.E.  
Program Administrator  
NPDES Stormwater Program  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subject: Palm Beach County NPDES Permit No. FLS00018 (Cycle 3)  
Year 2 Annual Report Comments/Responses, City of West Palm Beach

Dear Mr. Hubbard:

The Florida Department of Environmental Protection requested the following additional information from the City of West Palm Beach concerning its MS4 NPDES Permit Year 2 Annual Report.

**Street Sweeping Program for TN and TP Reduction**

**Comment:** Part III.A.3. of the MS4 Permit requires co-permittees to use the Florida Stormwater Association (FSA) MS4 Load Reduction Tool to calculate the total nitrogen (TN) and total phosphorus (TP) load reductions of street sweeping. A permittee may also use results from a similar study if it is approved by the Department prior to doing the load calculations:

**Response:** The City incorrectly reported the estimated quantities of street sweeping material collected. The correct number is 45,221,760 pounds. Based on Florida's Stormwater Association MS4 Load Reduction Tool the calculated TN load removed 25,465 pounds and the total TP load removed is 16,328 pounds.

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## **Florida-Friendly Fertilizer Ordinance**

**Comment:** Part III.A.6. of the MS4 permit requires that if a Florida-Friendly Landscaping Ordinance is not adopted, all local governments within the watershed of a nutrient-impaired water body shall adopt the Department's Model Ordinance for Florida-Friendly Fertilizer Use on Urban Landscapes or an ordinance that includes all of the requirements set forth in the Model Ordinance. The ordinance is required to be adopted within 24 months of permit issuance.

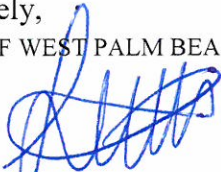
**Response:** FDEP commented that the City's Florida Friendly Fertilizer Ordinance is missing elements such as:

1. definition for Best Management Practices
2. definition for Urban Landscape
3. section covering Applicability

The City is currently comparing the model Palm Beach County fertilizer ordinance for municipalities with the City's and will amend the City's ordinance to cover the missing elements. Our schedule for the first reading adopting this ordinance is November 2013. Following the final adoption of the revised ordinance, a copy will be transmitted to FDEP.

If you have any further questions, please contact me at 561-822-2202.

Sincerely,  
CITY OF WEST PALM BEACH



Samuel L. Heady  
Assistant Director of Public Utilities

cc: Alan D. Wertepny, Mock Roos & Associates, Inc.

# Enter Weight of Solids<sup>(1)</sup> Removed - Calculate Equivalent Dry Weight

FSA 2012

Category of Maintenance Activity	For Dry Solids by Weight	For Wet Solids by Weight <sup>(2)</sup>			Sum of Calculated Equivilant Dry Weight Collected (Kilograms)
	If Known, Enter Weight of "Dry" Solids <sup>(3)</sup> (Pounds)	Enter Weight of Wet Solids Pounds	Enter Moisture Content <sup>(4)</sup> as decimal i.e., "0.15"	Calculated Weight of Dry Solids (Pounds)	
<b>Street Sweepings</b>	0	3,768,480	0.06	3,542,371	1,606,820
<b>Catch Basin Cleanout</b>	0	0	0.21	0	0
<b>BMP Cleanout</b>	0	0	0.26	0	0

### GREEN Denotes Cells for DATA ENTRY  
 ### BLUE Denotes Calculation Results

**NOTES:**

1. "Particulate Matter" from the FSA Final Report is defined as "Solids" for use in this spreadsheet.
2. For Solids that are not dry; also enter the approximate moisture content by weight.
3. Dry Solids is defined as sediment that is 2% moisture content or less.
4. Use these default moisture content values until confirmed by sampling.

# Calculated Nutrient Load Reductions from MS4 Maintenance Practices

FSA 2012

	Input and Output	Subtotal TP Removed (Kilograms)	Subtotal TP Removed (Pounds)
<b>TOTAL PHOSPHORUS</b>			
Street Sweepings - Dry Mass Collected (Kg)	1,606,820		
Amount of TP Removed (Kilograms)	580	580	1,279
Catch Basins - Dry Mass Collected	0		
Amount of TP Removed (Kilograms)	0	0	0
BMP - Dry Mass Collected	0		
Amount of TP Removed (Kilograms)	0	0	0
<b>GRAND TOTAL TP REMOVED (KILOGRAMS) =</b>		<b>580</b>	
<b>GRAND TOTAL TP REMOVED (POUNDS) =</b>			<b>1,279</b>

	Input and Output	Subtotal TN Removed (Kilograms)	Subtotal TN Removed (Pounds)
<b>TOTAL NITROGEN</b>			
Street Sweepings - Dry Mass Collected (Kg)	1,606,820		
Amount of TN Removed (Kilograms)	905	905	1,995
Catch Basins - Dry Mass Collected	0		
Amount of TN Removed (Kilograms)	0	0	0
BMP - Dry Mass Collected	0		
Amount of TN Removed (Kilograms)	0	0	0
<b>GRAND TOTAL TN REMOVED (KILOGRAMS) =</b>		<b>905</b>	
<b>GRAND TOTAL TN REMOVED (POUNDS) =</b>			<b>1,995</b>

**SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE**

A. Permit Citation/ SWMP Element	B. Permit Requirement/Quantifiable SWMP Activity	C. Number of Activities Performed	D. Documentation / Record	E. Entity Performing the Activity	F. Comments
<p><i>DEP Note: The permittee may choose its own unit of measurement for the amount of litter collected. Unit options include: bags, cubic yards, pounds, tons. If an Adopt-A-Road or similar program is not implemented by the permittee, please note that in Column F but do not remove the Adopt-A-Road Program reporting items.</i></p>					
<p><b>Keep PBC Beautiful Trash Pick-up Events: Total miles cleaned</b>  <b>Keep PBC Beautiful Trash Pick-up Events: Estimated amount of litter collected (cubic yards)</b>  <b>Adopt-A-Road Program: Total miles cleaned</b>  <b>Adopt-A-Road Program: Estimated amount of litter collected (cubic yards)</b></p>					
<p>Report on the street sweeping program, including the frequency of the sweeping, total miles swept, an estimate of the quantity of sweepings collected, and the total nitrogen (TN) and total phosphorus (TP) loadings that were removed by the collection of sweepings. If no street sweeping program is implemented, provide the explanation of why not in the Year 1 Annual Report.</p> <p><i>DEP Note: Please provide an explanation in Column F for any "0" reported in Column C. Also, the permittee may choose its own unit of measurement for the amount of sweeping material collected. Unit options include: cubic yards, pounds, tons.</i></p> <p><i>DEP Note: If the permittee has curbs and gutters but no street sweeping program is implemented, the permittee must provide an explanation of why not in the Year 1 Annual Report. Refer to Part III.A.3 of the permit for the information that must be included in the explanation (including the alternate BMPs used or planned in lieu of street sweeping). Please provide the title of the attached explanation in Column D and the name of the entity who finalized the explanation in Column E.</i></p>					
<p><b>Frequency of street sweeping</b></p>		<p>31 Weeks</p>	<p>Street Sweeping Monthly Report</p>	<p>CWPB Public Works Street Maintenance Sweeper Division</p>	
<p><b>Total miles swept (per year)</b></p>		<p>34,491</p>	<p>Street Sweeping Monthly Report</p>	<p>CWPB Public Works Street Maintenance Sweeper Division</p>	<p>Mileage was determined by CWPB Fleet Maintenance Program FMG218</p>
<p><b>Estimated quantity of sweeping material collected (cubic yards)</b></p>		<p>3,768,480</p>	<p>Street Sweeping Monthly Report</p>	<p>CWPB Public Works Street Maintenance Sweeper Division</p>	
<p><b>Total nitrogen loadings removed (pounds)</b></p>		<p>1,995</p>			
<p><b>Total phosphorus loadings removed (pounds)</b></p>		<p>1,279</p>			
<p><b>Year 1 ONLY: If have curbs and gutters, attach explanation of why no street sweeping program and the alternate BMPs used or planned</b></p>					
<p>Annually review (and revise, as needed) and implement the permittee's written standard practices to reduce the pollutants in stormwater runoff from areas associated with road repair and maintenance, and from permittee-owned or operated equipment yards and maintenance shops that support road maintenance activities. Report the number of applicable facilities and the number of inspections conducted for each facility.</p> <p><i>DEP Note: The permittee needs to "customize" this section by listing the names of the applicable facilities in Column B and the number of inspections of each facility in Column C. Add more rows if necessary. If "0" is reported in Column C for the number of inspections conducted and the permittee has one or more applicable facilities, please provide an explanation in Column F for why no inspections were conducted. In addition, if the same facility is applicable under both Parts III.A.3 and III.A.5 of the permit, the same site inspection can count towards both inspection requirements as long as it covers the applicable waste area(s). Be</i></p>					