



CITY OF EAGLE LAKE

"Growing With People In Mind"

75 N. 7th Street, P.O. Box 129, Eagle Lake, FL 33839
Phone (863) 293-4141 Fax: (863) 294-3590

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March 19, 2014

Mr. Edward Smith, Program Administrator
MS4 Permits
Florida Department of Environmental Protection
2600 Blair Stone Road MS 3585
Tallahassee, Florida 32399-2400

Re: Year 2 NPDES Submittal, City of Eagle Lake
Polk County Permit # FLS000015-03

Dear Mr. Smith:

Attached is the signed year 2 Annual Report form submitted by the City of Eagle Lake for our NPDES permit for our MS4. The City of Eagle Lake is a co-permittee with Polk County.

Everything is being transmitted electronically with this letter. The list of what has been submitted is as follows:

Cover Letter (1)
Annual Report Form with SWMP evaluations and Checklists A & B (2)
The following attachments:

3. Fertilizer Ordinance, Adopted 3-17-14
4. Part III A.2 Development Code Review Activities
5. Part III A.7.C SOP for Inspection and Maintenance Activities of Stormwater System
6. Part III A.2 SOP for Development Review Procedures
7. Part III A.s/ Part III A.3 SOP and Revisions for Street Sweeping/Litter Control Program
8. Part III A.3-5 SOP for Equipment Yard Inspections and Waste Treatment and Storage Facilities not covered by an NPDES Permit
9. Part III A.6 Public Education on Reducing Use of Pesticides/Fertilizer/Herbicides
10. Part III A. SOP for Proper Application, Storage, and use of Pesticides/Herbicides/Fertilizer
11. Part III A.7.c Plan for Proactive Inspections
12. Part III A.7.c Plan for Reactive Illicit Discharge Investigations
13. Part III A.7.d Plan for Illicit Discharge Training
14. Part III A.7.d SOP for Spill Prevention and Response Efforts
15. Part III A.7.c Plan for Illicit Discharge Training
16. Part III A.7.e Plan for Public Education on Identifying Illicit Discharges
17. Part III A.7.f Plan for Public Education on Proper Use and Disposal of Toxics and Household Waste

18. Part III A.7.g SOP to Reduce/Eliminate Wastewater Contamination of the MS4
19. Part III A.8/ Part III A.a&b AND Repeat of A.2 Development Review Procedures SOP
20. Part III A.9 c Plan for Storm Water/Erosion Control Training
21. Part VI Annual Report Content: Answer Questions in the Permit Part VI

Please note that Year 2 requirements for code review (Part III A.2) is included under item #4, with the adopted fertilizer ordinance included under item #3. All the plans/SOPs included under Checklists A and B have been reviewed, and one, litter collection, has been revised. Finally, there is a requirement that the questions listed under Part VI of the permit be answered. Those questions are each listed and answered under item #21.

As with last year, the submittal is being done prior to March 31 to ensure everything arrives prior to deadline. If some of the items listed are not in the Eagle Lake folder please let me know at 863-293-4141.

Sincerely,



Peter T. Gardner
City Manager

Attachments: as stated



ANNUAL REPORT FORM FOR INDIVIDUAL NPDES PERMITS FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (RULE 62-624.600(2), F.A.C.)

- This Annual Report Form must be completed and submitted to the Department to satisfy the annual reporting requirements established in Rule 62-621.600, F.A.C.
- Submit this fully completed and signed form and any REQUIRED attachments by email to the NPDES Stormwater Program Administrator or to the MS4 coordinator. Their names and email addresses are available at: <http://www.dep.state.fl.us/water/stormwater/npdes/contacts.htm>. If files are larger than 10mb, materials may be placed on the NPDES Stormwater ftp site at: ftp://ftp.dep.state.fl.us/pub/NPDES_Stormwater/. After uploading the ANNUAL REPORT files, an email must be sent to the MS4 coordinator or the NPDES program administrator notifying them the report is ready for downloading
- Refer to the Form Instructions for guidance on completing each section.
- Please print or type information in the appropriate areas below

SECTION I. BACKGROUND INFORMATION			
A.	Permittee Name: City of Eagle Lake, Florida		
B.	Permit Name: Polk County Municipal Separate Storm Sewer System		
C.	Permit Number: FLS000015-003 (Cycle 3)		
D.	Annual Report Year: Year 1 <input checked="" type="checkbox"/> Year 2 <input type="checkbox"/> Year 3 <input type="checkbox"/> Year 4 <input type="checkbox"/> Year 5 <input type="checkbox"/> Other, specify Year:		
E.	Reporting Time Period (month/year): 10-1-2012 through 09-30-2013		
F.	Name of the Responsible Authority: Peter T. Gardner		
	Title: City Manager		
	Mailing Address: P. O. Box 129		
	City: Eagle Lake	Zip Code: 33839	County: Polk
	Telephone Number: 863-293-4141		Fax Number: 863-294-3590
E-mail Address: citymanager@eaglelake-fla.com			
G.	Name of the Designated Stormwater Management Program Contact (if different from Section I.F above):		
	Title:		
	Department:		
	Mailing Address:		
	City:	Zip Code:	County:
	Telephone Number:		Fax Number:
E-mail Address:			

SECTION II. MS4 MAJOR OUTFALL INVENTORY (Not Applicable In Year 1)	
A.	Number of outfalls ADDED to the outfall inventory in the current reporting year (insert "0" if none): 0 (Does this number include non-major outfalls? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable)
B.	Number of outfalls REMOVED from the outfall inventory in the current reporting year (insert "0" if none): 0 (Does this number include non-major outfalls? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable)
C.	Is the change in the total number of outfalls due to lands annexed or vacated? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable

SECTION III. MONITORING PROGRAM

- A. Provide a brief statement as to the status of monitoring plan implementation:
DEP Note: Please refer to Polk County Annual Report
- B. Provide a brief discussion of the monitoring results to date:
Please refer to Polk County Annual Report for the monitoring information
DEP Note: See Part V of the permit for the monitoring requirements. Each permittee must discuss the monitoring results as it relates to the implementation and effectiveness of their SWMP.
- C. Attach a monitoring data summary, as required by the permit.

SECTION IV. FISCAL ANALYSIS

- A. Total expenditures for the NPDES stormwater management program for the current reporting year: \$92,000
DEP Note: If program resources have decreased from the previous year, attach a discussion of the impacts on the implementation of the SWMP as per Part II.F of the permit.
- B. Total budget for the NPDES stormwater management program for the subsequent reporting year: \$42,000

SECTION V. MATERIALS TO BE SUBMITTED WITH THIS ANNUAL REPORT FORM

Only the following materials are to be submitted to the Department along with this fully completed and signed Annual Report Form (check the appropriate box to indicate whether the item is attached or is not applicable):

<u>Attached</u>	<u>N/A</u>	<i>***DEP Note: Please complete Checklists A & B at the end of the tailored form.***</i>
X	<input type="checkbox"/>	Any additional information required to be submitted in this current annual reporting year in accordance with Part III.A of your permit that is not otherwise included in Section VII below.
<input type="checkbox"/>	X	A monitoring data summary as directed in Section III.C above and in accordance with Rule 62-624.600(2)(c), F.A.C.
<input type="checkbox"/>	<input type="checkbox"/>	Year 1 ONLY: An inventory of all known major outfalls and a map depicting the location of the major outfalls (hard copy or CD-ROM) in accordance with Rule 62-624.600(2)(a), F.A.C.
<input type="checkbox"/>	X	Year 3 ONLY: The estimates of pollutant loadings and event mean concentrations for each major outfall or each major watershed in accordance with Rule 62-624.600(2)(b), F.A.C.
<input type="checkbox"/>	X	Year 4 ONLY: Permit re-application information in accordance with Rule 62-624.420(2), F.A.C.

DO NOT SUBMIT ANY OTHER MATERIALS
(such as records and logs of activities, monitoring raw data, public outreach materials, etc.)

SECTION VI. CERTIFICATION STATEMENT AND SIGNATURE

The Responsible Authority listed in Section I.F above must sign the following certification statement, as per Rule 62-620.305, F.A.C:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing

Name of Responsible Authority (type or print): Peter T. Gardner

Title: City Manager

Signature:  Date: 03/19/2014

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A.	B.					C.	D.	E.	F.
Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity					Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments
Part III.A.1	Structural Controls and Stormwater Collection Systems Operation								
	<p>Maintain an up-to-date inventory of the structural controls and roadway stormwater collection structures operated by the permittee, including, at a minimum, all of the types of control structures listed in Table II.A.1.a of the permit. Report the current known inventory. The City of Eagle Lake has Three Dry Retention Ponds and 56 catch basins. Map of Retention Ponds and Catch Basins and Inventory submitted with year 1 report</p> <p>Provide an inventory of all known major outfalls covered by the permit and a map depicting the location of the major outfalls (hard copy or CD-ROM). Provide the outfall inventory and map with the Year 1 Annual Report.</p> <p>Report the number of inspection and maintenance activities conducted for each type of structure included in Table II.A.1.a, and the percentage of the total inventory of each type of structure inspected and maintained. If the minimum inspection frequencies set forth in Table II.A.1.a were not met, provide as an attachment an explanation of why they were not and a description of the actions that will be taken to ensure that they will be met.</p> <p>Inspection Activities were all met in year 2 report as they were in year 1 report.</p>								
	Type of Structure	Number of Activities Performed				Documentation / Record	Entity Performing the Activity	Comments	
		Total Number of Structures	Number of Inspections	Percentage Inspected	Number of Maintenance Activities	Percentage Maintained			
	Dry retention systems	3	12	100%	18	100%	Inspection for retention ponds	Public Works	
	Exfiltration trench / French drains (linear feet)								
	Grass treatment swales (miles)								
	Dry detention systems								
	Wet detention systems								
	Alum injection systems								
	Pollution control boxes								
	Stormwater pump stations								
	Major stormwater outfalls	12	224	100%	224	100%	Inspection for out falls		
	Weirs or other control structures								

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	MS4 pipes / culverts (miles)							
	Inlets / catch basins / grates							
	Ditches / conveyance swales (miles)	0			0	0	0	All Inspection activities done
	ATTACH explanation if any of the minimum inspection frequencies in Table II.A.1.a were not met Year 1 ONLY: Attach a map of all known major outfalls							
Part III.A.2	Areas of New Development and Significant Redevelopment							
	Report the number of significant redevelopment projects reviewed by the permittee for post-development stormwater considerations.							
	<i>DEP Note: Please provide an explanation in Column F for any "0" reported in Column C.</i>							
	Number of significant redevelopment projects reviewed				0		No Projects in 2013-14	
	Provide in the Year 2 Annual Report the summary report of the review of local codes activity. Provide in the Year 4 Annual Report the follow-up report on plan implementation of modifying codes to allow low impact design BMPs.							
	<i>DEP Note: Refer to Part III.A.2 of the permit for details regarding what the review entails, and what must be included in the summary report and follow-up report. Please provide the title of the attached report in Column D and the name of the entity who finalized the report in Column E.</i>							
	Year 2 ONLY: Attach the summary report of the review activity							Review Activities on Separate Sheet
	Year 4 ONLY: Attach the follow-up report on plan implementation							
Part III.A.3	Roadways							
	Annually review (and revise, as needed) and implement the permittee's written procedures for the litter control program(s) for public streets, roads, and highways, including rights-of-way, employed within the permittee's jurisdictional area and properly dispose of collected material. Implement the program on a monthly, or on an as needed, basis. Report on the litter control program, including the frequency of litter collection, an estimate of the total number of road miles cleaned or amount of area covered by the activities, and an estimate of the quantity of litter collected.							
	<i>DEP Note: Please provide an explanation in Column F for any "0" reported in Column C. In addition, the permittee may choose its own units of measurement for the reporting items. Unit options for the amount of litter include: bags, cubic yards, pounds, tons. Unit options for the amount of area covered by the activity include: square feet, linear feet, yards, miles, acres. If all litter collection is performed by staff or by contractors, but not by both, please remove the non-applicable reporting items.</i>							
	PERMITTEE Litter Control Program: Frequency of litter collection				52	Weekly	Public Works	
	PERMITTEE Litter Control Program: Estimated amount of area maintained (linear feet)				28,000	Weekly	Public Works	
	PERMITTEE Litter Control Program: Estimated amount of litter collected (cubic yards)				80	Weekly	Public Works	
	CONTRACTOR Litter Control Program: Frequency of litter collection				0		No contractor	

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	CONTRACTOR Litter Control Program: Estimated amount of area maintained (linear feet)	0			No contractor
	CONTRACTOR Litter Control Program: Estimated amount of litter collected (cubic yards)	0			No contractor
	If an Adopt-A-Road or similar program is implemented, report the total number of road miles cleaned and an estimate of the quantity of litter collected.				
	<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>				
	Trash Pick-up Events: Total miles cleaned	2	Registration	Volunteers	
	Trash Pick-up Events: Estimated amount of litter collected (cubic yards)	3	Number of bags	Volunteers	
	Adopt-A-Road Program: Total miles cleaned	0			
	Adopt-A-Road Program: Estimated amount of litter collected (cubic yards)	0			
	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.				
	<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>				
	<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>				
	Frequency of street sweeping	0			
	Total miles swept (per year)	0			
	Estimated quantity of sweeping material collected (cubic yards)	0			
	Total nitrogen loadings removed (pounds)	0			
	Total phosphorus loadings removed (pounds)				
	Year 1 ONLY: If have curbs and gutters, attach explanation of why no street sweeping program and the alternate BMPs used or planned				
	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.				
	<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 sure to report the site inspection under both Parts III.A.3 and III.A.5.</i>				
		Number of Inspections			

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Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity	Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments																														
	Name of facility #1: Public Works shop access Name of facility #2: Name of facility #3:	2	Municipal Maintenance Yard Inspection check list	Public Works/BoCC	Same Inspections as done in Year 1																														
Part III.A.4	Flood Control Projects																																		
	<p>Report the total number of flood control projects that were constructed by the permittee during the reporting period and the number of those projects that did NOT include stormwater treatment. The permittee shall provide a list of the projects where stormwater treatment was not included with an explanation for each of why it was not. Report on any stormwater retrofit planning activities and the associated implementation of retrofitting projects to reduce stormwater pollutant loads from existing drainage systems that do not have treatment BMPs.</p> <p><i>DEP Note: A "stormwater retrofit project" is one implemented primarily to provide stormwater treatment for areas currently without treatment.</i></p> <p><i>DEP Note: The status of the flood control and retrofit projects should be reported as of the last day of the applicable reporting period. Therefore, there should be no duplication for those reported as planned, for those reported as under construction and for those reported as completed.</i></p> <p><i>DEP Note: If applicable, please provide the title of the attached list of flood control projects that did not include stormwater treatment in Column D and the name of the entity who finalized the list in Column E.</i></p> <table border="1" data-bbox="234 867 2032 1156"> <tr> <td data-bbox="234 867 1117 900">Flood control projects completed during the reporting period</td> <td data-bbox="1117 867 1351 900">0</td> <td data-bbox="1351 867 1596 900"></td> <td data-bbox="1596 867 1819 900"></td> <td data-bbox="1819 867 2032 900"></td> </tr> <tr> <td data-bbox="234 900 1117 949">Flood control projects completed during the reporting period that did not include stormwater treatment</td> <td data-bbox="1117 900 1351 949">0</td> <td data-bbox="1351 900 1596 949"></td> <td data-bbox="1596 900 1819 949"></td> <td data-bbox="1819 900 2032 949"></td> </tr> <tr> <td data-bbox="234 949 1117 1015">ATTACH a list of the flood control projects that did not include stormwater treatment and an explanation for each of why it was not</td> <td data-bbox="1117 949 1351 1015"></td> <td data-bbox="1351 949 1596 1015"></td> <td data-bbox="1596 949 1819 1015"></td> <td data-bbox="1819 949 2032 1015"></td> </tr> <tr> <td data-bbox="234 1015 1117 1065">Stormwater retrofit projects planned</td> <td data-bbox="1117 1015 1351 1065">1</td> <td data-bbox="1351 1015 1596 1065">SWFMD Bingham Application</td> <td data-bbox="1596 1015 1819 1065">Admin</td> <td data-bbox="1819 1015 2032 1065">Bingham Design done in Year 1</td> </tr> <tr> <td data-bbox="234 1065 1117 1115">Stormwater retrofit projects under construction during the reporting period</td> <td data-bbox="1117 1065 1351 1115">0</td> <td data-bbox="1351 1065 1596 1115"></td> <td data-bbox="1596 1065 1819 1115"></td> <td data-bbox="1819 1065 2032 1115"></td> </tr> <tr> <td data-bbox="234 1115 1117 1156">Stormwater retrofit projects completed during the reporting period</td> <td data-bbox="1117 1115 1351 1156">0</td> <td data-bbox="1351 1115 1596 1156"></td> <td data-bbox="1596 1115 1819 1156"></td> <td data-bbox="1819 1115 2032 1156"></td> </tr> </table>					Flood control projects completed during the reporting period	0				Flood control projects completed during the reporting period that did not include stormwater treatment	0				ATTACH a list of the flood control projects that did not include stormwater treatment and an explanation for each of why it was not					Stormwater retrofit projects planned	1	SWFMD Bingham Application	Admin	Bingham Design done in Year 1	Stormwater retrofit projects under construction during the reporting period	0				Stormwater retrofit projects completed during the reporting period	0			
Flood control projects completed during the reporting period	0																																		
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Stormwater retrofit projects planned	1	SWFMD Bingham Application	Admin	Bingham Design done in Year 1																															
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Part III.A.5	Municipal Waste Treatment, Storage, and Disposal Facilities Not Covered by an NPDES Stormwater Permit																																		
	<p>Annually review (and revise, as needed) and implement the permittee's written procedures for inspections and the implementation of measures to control discharges from the following facilities that are not otherwise covered by an NPDES stormwater permit:</p> <ul style="list-style-type: none"> • Operating municipal landfills; • Municipal waste transfer stations; • Municipal waste fleet maintenance facilities; and • Any other municipal waste treatment, waste storage, and waste disposal facilities. <p>Report the number of applicable facilities and the number of the inspections conducted for each facility.</p>																																		

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Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity	Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments
<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. An applicable facility under Part III.A.5 includes, but is not limited to, those facilities/yards where street sweeping material and/or yard waste are temporary stockpiled, and where solid waste collection vehicles are parked and/or maintained. 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 sure to report the site inspection under both Parts III.A.3 and III.A.5.</i></p>					
		Number of Inspections			
Name of facility #1:Public Works shop access		2	Municipal Maintenance Yard Inspection check list	Public Works/BoCC	Repeat of what was reported in Previous Section
Name of facility #2:					
Name of facility #3:					
Name of facility #4:					
Part III.A.6	Pesticides, Herbicides, and Fertilizer Application				
<p>Continue to require proper certification and licensing by the Florida Department of Agriculture and Consumer Services (FDACS) for all applicators contracted to apply pesticides, herbicides, or fertilizers on permittee-owned property, as well as any permittee personnel employed in the application of these products. Report the number of permittee personnel applicators and contracted commercial applicators of pesticides and herbicides who are FDACS certified / licensed. Report the number of permittee personnel and contractors who have been trained through the Green Industry BMP Program, and the number of contracted commercial applicators of fertilizer who are FDACS certified / licensed.</p>					
<p><i>DEP Note: If "0" is reported in Column C for any of the reporting items, please include in Column F an explanation of why training was not provided to / obtained by personnel and contractors during the applicable reporting year, the most recent year that training / certification was previously provided / obtained, and the names of the personnel and contractors previously trained / certified.</i></p>					
PERSONNEL: Florida Department of Agriculture and Consumer Services (FDACS) certified applicators of pesticides and herbicides		0			Explanation on Separate Sheet
CONTRACTORS: FDACS certified / licensed applicators of pesticides and herbicides		1	certificate	FL Pest Control	
CONTRACTORS: FDACS certified / licensed applicators of fertilizer		0			
PERSONNEL: Green Industry BMP Program training completed		0		Public Works	
CONTRACTORS: Green Industry BMP Program training completed		0			
<p>Pursuant to SB 2080 (2009), all local governments are encouraged to adopt a Florida-friendly Landscaping Ordinance similar to the one set forth in the document "Florida-friendly Guidance Models for Ordinances, Covenants and Restrictions." If the broader Florida-friendly ordinance described above is not adopted, then 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 pursuant to SB 494 (2009) or an ordinance that includes all of the requirements set forth in the Model Ordinance. The ordinance shall be adopted within 24 months of the date of permit issuance.</p>					
<p>The city is has worked with BoCC to develop an ordinance and Ordinance is being adopted in March 2014.</p>					

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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
<i>DEP Note: Please provide the title and citation of the ordinance in Column D, and the name of the entity who finalized the ordinance in Column E.</i>					
Year 1 or Year 2 ONLY: Attach copy of adopted Florida-friendly ordinance					Ordinance adopted in March
<p>During Year 1 of the permit, develop and implement a written public education and outreach program plan to encourage citizens to reduce their use of pesticides, herbicides, and fertilizers. Report on the public education and outreach activities that are performed or sponsored by the permittee within the permittee's jurisdiction to encourage citizens to reduce their use of pesticides, herbicides, and fertilizers, including the type and number of activities conducted, the type and number of materials distributed, the percentage of the population reached by the activities in total, and the number of Web site visits (if applicable). Activities performed under the Florida Yards and Neighborhoods (FYN) program should only be reported if the permittee is contributing funding towards the FYN staff and program within its jurisdiction.</p> <p><i>DEP Note: The permittee should "customize" the list of public outreach activities by removing items or adding items to the list below as appropriate to their particular public outreach program. However, the reporting item of "Estimated percentage of the population reached by the activities in total" must remain. The permittee may add more specifics to the reporting items, such as the name of the brochure or newsletter distributed. If "0" is reported in Column C for all the reporting items please include in Column F an explanation for why no outreach was performed.</i></p> <p><i>DEP Note: Polk County is to report the public education and outreach activities that it performed county-wide (and not just in the unincorporated areas of Polk County). The co-permittees are to report just the public education and outreach activities that they performed.</i></p> <p><i>DEP Note: Indicate under Column E "Entity Performing the Activity" if FYN or IFAS is performing any of the reported public education and outreach activities. In addition, please complete the following line:</i></p> <p style="text-align: center;">FYN PROGRAM FUNDING: Permittee Provides Funding? <input type="checkbox"/> Yes x No Amount of Funding = \$</p>					
Estimated percentage of the population reached by the activities in total		100%	Newsletter	Admin	
Brochures/Flyers/Fact sheets distributed		200			
FYN: Brochure/Flyers/Fact sheets distributed		0		FYN	
Neighborhood presentations: Number conducted		0			
FYN: Neighborhood presentations: Number of participants		0		FYN	
FYN: Neighborhood presentations: Number conducted		0		FYN	
Neighborhood presentations: Number of participants		0			
Newspapers & newsletters: Number of articles/notices published		Quarterly	Newsletter		Same as in Year 1
Newsletters: Number of newsletters distributed		1,500			
Public displays (e.g., kiosks, storyboards, posters, etc.)		1			
FYN: Public displays (e.g., kiosks, storyboards, posters, etc.)		0		FYN	
Radio or television Public Service Announcements (PSAs)		0			
FYN: Radio or television Public Service Announcements (PSAs)		0		FYN	
School presentations: Number conducted		0			
School presentations: Number of participants		0			
FYN: School presentations: Number conducted		0		FYN	
FYN: School presentations: Number of participants		0		FYN	
Seminars/Workshops: Number conducted		1	Summer Recreation	Admin	Same as in Year 1
Seminars/Workshops: Number of participants		60			More Children

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A.	B.	C.	D.	E.	F.
Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity	Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments
	FYN: Seminars/Workshops: Number conducted	0		FYN	
	FYN: Seminars/Workshops: Number of participants	0		FYN	
	Special events: Number conducted	2			Same as in Year 1
	Special events: Number of participants	150			
	FYN: Special events: Number conducted	0		FYN	
	FYN: Special events: Number of participants	0		FYN	
	Web Site: Number of hits / visitors to the stormwater-related pages				
Part III.A.7.a	Illicit Discharges and Improper Disposal — Inspections, Ordinances, and Enforcement Measures				
	Where applicable, strengthen the 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. <u>Report amendments, as needed.</u>				
	<i>DEP Note: If applicable, please provide the title of the attached report in Column D and the name of the entity who finalized the report in Column E.</i>				
	<u>ATTACH a report on any amendments to the applicable legal authority</u>				
Part III.A.7.c	Illicit Discharges and Improper Disposal — Investigation of Suspected Illicit Discharges and/or Improper Disposal				
	During Year 1 of the permit, develop and implement a written proactive inspection program plan for identifying and eliminating sources of illicit discharges, illicit connections, or dumping to the MS4. <u>Report on the proactive inspection program, including the number of inspections conducted, the number of illicit activities found, and the number and type of enforcement actions taken.</u>				
	<i>DEP Note: If "0" is reported in Column C for the first reporting item, please include an explanation in Column F for why no proactive inspections were performed. In addition, the permittee should re-word the "NOVs / warning letters / citations issued" reporting item to more accurately reflect its particular initial enforcement activity, if necessary.</i>				
	<i>DEP Note: Proactive inspections may include, for example, suspect areas (e.g., industrial areas), commercial businesses (e.g., restaurants, car washes, service stations, laundries / dry cleaners, auto body shops, mobile carpet cleaners) or temporary activities (e.g., special events / fairs / circus) that would not otherwise be inspected during routine inspections and maintenance of the MS4, in association with high risk industrial facilities or construction sites, or in response to citizen or staff reports.</i>				
	<i>DEP Note: Polk County is to report ONLY the proactive inspections it performed in the unincorporated areas of Polk County – any proactive inspections it performed in the co-permittees' jurisdictions are to be reported by the co-permittees. Each co-permittee is to report the Polk County proactive inspections done in their jurisdiction separately from the proactive inspections that the co-permittee performed itself.</i>				
	<i>DEP Note: Refer to Part III.A.7.c of the permit for what must be included in the written proactive inspection program plan. Please provide the title of the attached plan in Column D and the name of the entity who finalized the plan in Column E.</i>				
	Proactive inspections performed by Polk County on behalf of a co-permittee for suspected illicit discharges / connections / dumping	0		Polk County DNR	
	Proactive inspections performed by the permittee for suspected illicit discharges / connections / dumping	224	Inspection Form for Structural Controls	Public Works	Same as in Year 1

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A.	B.	C.	D.	E.	F.
Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity	Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments
	Illicit discharges / connections / dumping found during a proactive inspection	0			Same as in Year 1
	Notices of Violation (NOVs) / warning letters / citations issued for illicit discharges / connections / dumping found during a proactive inspection	0			
	Fines issued for illicit discharges / connections / dumping found during a proactive inspection	0			
	Year 1 ONLY: Attach the written proactive inspection program plan				
	<p>Annually review (and revise, as needed) and implement the permittee's written procedures to conduct reactive investigations to identify and eliminate the source(s) of illicit discharges, illicit connections or improper disposal to the MS4, based on reports received from permittee personnel, contractors, citizens, or other entities regarding suspected illicit activity. Report on the reactive investigation program as it relates to responding to reports of suspected illicit discharges, including the number of reports received, the number of investigations conducted, the number of illicit activities found, and the number and type of enforcement actions taken. If a permittee relies on Polk County to conduct these activities on its behalf, the permittee shall obtain (and, upon request, Polk County shall make available) the necessary annual report information from the County.</p> <p><i>DEP Note: If the number of reports received differs from the number of reactive investigations, please provide an explanation for the discrepancy in Column F. In addition, the permittee should re-word the "NOVs / warning letters / citations issued" reporting item to more accurately reflect its particular initial enforcement activity, if necessary.</i></p>				
	Reports received by Polk County of suspected illicit connections / discharges / dumping received	0			Same as in Year 1
	Reports received by the permittee of suspected illicit connections / discharges / dumping received	0			
	Reactive investigations of reports of suspected illicit discharges/ connections / dumping	0			
	Illicit discharges / connections / dumping found during a reactive investigation	N/A			
	Notices of Violation (NOVs) / warning letters / citations issued for illicit discharges / connections / dumping found during a reactive investigation	0			
	Fines issued for illicit discharges / connections / dumping found during a reactive investigation	0			
	<p>During Year 1 of the permit, develop and implement a written plan for the training of all appropriate permittee personnel (including field crews, fleet maintenance staff, and inspectors) and contractors to identify and report conditions in the stormwater facilities that may indicate the presence of illicit discharges / connections / dumping to the MS4. Refresher training shall be provided annually. Report the type of training activities, and the number of permittee personnel and contractors trained (both in-house and outside training).</p> <p><i>DEP Note: If "0" is reported for either reporting item, please include in Column F an explanation of why training was not provided to / obtained by personnel and contractors during the applicable reporting year, the most recent year that training was previously provided / obtained, and the names of the personnel and contractors previously trained.</i></p>				
		Initial Training	Refresher Training		
	Personnel trained	0			Explanation attached
	Contractors trained	0			
Part III.A.7.d	Illicit Discharges and Improper Disposal — Spill Prevention and Response				

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A.	B.	C.	D.	E.	F.																																																
Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity	Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments																																																
	<p>Annually review (and revise, as needed) and implement the permittee's written spill-prevention/spill-response plan and procedures to prevent, contain, and respond to spills that discharge into the MS4. Report on the spill prevention and response activities, including the number of spills addressed. If a permittee relies on the Polk County Fire Rescue or Fire Services Division to conduct these activities on its behalf, the permittee shall obtain (and, upon request, Polk County Fire Rescue/Fire Services Division shall make available) the necessary annual report information from the County.</p> <p><i>DEP Note: The permittee may report the number of hazardous material spills separately from the number of non-hazardous material spills, or report one combined number, to more accurately reflect its tracking of these spills.</i></p>	0																																																			
	<p>Hazardous and non-hazardous material spills responded to</p> <p>During Year 1 of the permit, develop and implement a written plan for the training of all appropriate permittee personnel (including field crews, firefighters, fleet maintenance staff and inspectors) and contractors on proper spill prevention, containment, and response techniques and procedures. Refresher training shall be provided annually. Report the type of training activities, and the number of permittee personnel and contractors trained (both in-house and outside training).</p> <p><i>DEP Note: If "0" is reported for either reporting item, please include in Column F an explanation of why training was not provided to / obtained by personnel and contractors during the applicable reporting year, the most recent year that training was previously provided / obtained, and the names of the personnel and contractors previously trained.</i></p>	0																																																			
	<table border="1"> <thead> <tr> <th></th> <th>Initial Training</th> <th>Refresher Training</th> </tr> </thead> <tbody> <tr> <td>Personnel trained</td> <td>0</td> <td>0</td> </tr> <tr> <td>Contractors trained</td> <td>0</td> <td>0</td> </tr> </tbody> </table>		Initial Training	Refresher Training	Personnel trained	0	0	Contractors trained	0	0				No Training																																							
	Initial Training	Refresher Training																																																			
Personnel trained	0	0																																																			
Contractors trained	0	0																																																			
Part III.A.7.e	<p>Illicit Discharges and Improper Disposal — Public Reporting</p>																																																				
	<p>During Year 1 of the permit, develop and implement a written public education and outreach program plan to promote, publicize, and facilitate public reporting of the presence of illicit discharges and improper disposal of materials into the MS4. Report on the public education and outreach activities that are performed or sponsored by the permittee within the permittee's jurisdiction to encourage the public reporting of suspected illicit discharges and improper disposal of materials, including the type and number of activities conducted, the type and number of materials distributed, the percentage of the population reached by the activities in total, and the number of Web site visits (if applicable).</p> <p><i>DEP Note: The permittee should "customize" the list of public outreach activities by removing items or adding items to the list below as appropriate to their particular public outreach program. However, the reporting item of "Estimated percentage of the population reached by the activities in total" must remain. The permittee may add more specifics to the reporting items, such as the name of the brochure or newsletter distributed. If "0" is reported in Column C for all the reporting items, please include in Column F an explanation for why no outreach was performed.</i></p> <p><i>DEP Note: Polk County is to report the public education and outreach activities that it performed county-wide (and not just in the unincorporated areas of Polk County). The co-permittees are to report just the public education and outreach activities that they performed.</i></p>																																																				
	<table border="1"> <tbody> <tr> <td>Estimated percentage of the population reached by the activities in total</td> <td>100%</td> <td></td> <td></td> <td></td> <td>Same as Year 1</td> </tr> <tr> <td>Publicize the Polk County or local Pollution Complaint Hotline</td> <td>200</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Brochures/Flyers/Fact sheets distributed</td> <td>0</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Neighborhood presentations: Number conducted</td> <td>0</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Neighborhood presentations: Number of participants</td> <td>0</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Newspapers & newsletters: Number of articles/notices published</td> <td>0</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Newsletters: Number of newsletters distributed</td> <td>1500</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Public displays (e.g., kiosks, storyboards, posters, etc.)</td> <td>1</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Estimated percentage of the population reached by the activities in total	100%				Same as Year 1	Publicize the Polk County or local Pollution Complaint Hotline	200					Brochures/Flyers/Fact sheets distributed	0					Neighborhood presentations: Number conducted	0					Neighborhood presentations: Number of participants	0					Newspapers & newsletters: Number of articles/notices published	0					Newsletters: Number of newsletters distributed	1500					Public displays (e.g., kiosks, storyboards, posters, etc.)	1								
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SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A.	B.	C.	D.	E.	F.
Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity	Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments
	Radio or television Public Service Announcements (PSAs) School presentations: Number conducted School presentations: Number of participants Seminars/Workshops: Number conducted Seminars/Workshops: Number of participants Special events: Number conducted Special events: Number of participants Web Site: Number of visitors to the stormwater-related pages	0 0 60 0 0 0 0 0			More Children in Summer Recreation
Part III.A.7.f	Illicit Discharges and Improper Disposal — Oils, Toxics, and Household Hazardous Waste Control				
	<p>During Year 1 of the permit, develop and implement a written public education and outreach program plan to encourage the proper use and disposal of used motor vehicle fluids, leftover hazardous household products, and lead acid batteries. Report on the public education and outreach activities that are performed or sponsored by the permittee within the permittee's jurisdiction to encourage the proper use and disposal of oils, toxics, and household hazardous waste, including the type and number of activities conducted, the type and number of materials distributed, the amount of waste collected / recycled / properly disposed, the percentage of the population reached by the activities in total, and the number of Web site visits (if applicable).</p> <p><i>DEP Note: The permittee should "customize" the list of public outreach activities by removing items or adding items to the list below as appropriate to their particular public outreach program. However, the reporting items of "Estimated percentage of the population reached by the activities in total" and "Household Chemical Collection Center Program: Amount of waste collected / recycled / properly disposed (tons)" must remain. The permittee may add more specifics to the reporting items, such as the name of the brochure or newsletter distributed. If "0" is reported in Column C for all the reporting items, please include in Column F an explanation for why no outreach was performed.</i></p> <p><i>DEP Note: Polk County is to report the public education and outreach activities that it performed county-wide (and not just in the unincorporated areas of Polk County). The co-permittees are to report just the public education and outreach activities that they performed.</i></p>				
	Estimated percentage of the population reached by the activities in total Household Chemical Collection Center Program: Amount of waste collected / recycled / properly disposed (tons) Household Chemical Collection Center Program: Events Household Hazardous Waste Materials Guides distributed Brochures/Flyers/Fact sheets distributed Neighborhood presentations: Number conducted Neighborhood presentations: Number of participants Newspapers & newsletters: Number of articles/notices published Newsletters: Number of newsletters distributed Public displays (e.g., kiosks, storyboards, posters, etc.) Radio or television Public Service Announcements (PSAs) School presentations: Number conducted School presentations: Number of participants Seminars/Workshops: Number conducted	100% 0 1 100 100 0 0 0 1500 1 0 0 0 1			

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A.	B.	C.	D.	E.	F.																																																			
Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity	Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments																																																			
	<p>Seminars/Workshops: Number of participants</p> <p>Special events: Number conducted</p> <p>Special events: Number of participants</p> <p>Storm sewer inlets newly marked/replaced</p> <p>Web Site: Number of visitors to the stormwater-related pages</p>	<p>60</p> <p>2</p> <p>150</p>			<p>More Children in Summer Recreation</p>																																																			
Part III.A.7.g	Illicit Discharges and Improper Disposal — Limitation of Sanitary Sewer Seepage																																																							
	<p>Annually review (and revise, as needed) and implement the permittee's written procedures to reduce or eliminate sanitary wastewater contamination into the MS4, including discharges to the MS4 from sanitary sewer overflows (SSOs) and from inflow / infiltration from collection / transmission systems and/or septic tank systems. Advise the appropriate utility owner of a violation if constituents common to wastewater contamination are discovered in the MS4. Report on the type and number of activities undertaken to reduce or eliminate SSOs and inflow / infiltration, the number of SSOs or inflow / infiltration incidents found and the number resolved, and the name of the owner of the sanitary sewer system within the permittee's jurisdiction.</p> <p><i>DEP Note: The permittee needs to "customize" this section as it pertains to the type of activities undertaken to reduce or eliminate SSOs and inflow / infiltration into the MS4. The first five reporting items below are examples.</i></p> <p><i>DEP Note: The permittee should contact the appropriate authorities for accurate reporting information, such as the sanitary sewer system operator who is responsible for investigating and eliminating SSOs and the local health department who is responsible for permitting / overseeing septic tank systems.</i></p> <p><i>DEP Note: Report only the SSOs and inflow / infiltration incidents into the MS4.</i></p> <table border="1" data-bbox="236 921 2045 1409"> <tr> <td data-bbox="236 921 1119 979">Activity to reduce/eliminate SSOs and inflow / infiltration: Sanitary sewer pipe inspected for infiltration (linear feet)</td> <td data-bbox="1119 921 1349 979">0</td> <td data-bbox="1349 921 1602 979"></td> <td data-bbox="1602 921 1832 979"></td> <td data-bbox="1832 921 2045 979"></td> </tr> <tr> <td data-bbox="236 979 1119 1037">Activity to reduce/eliminate SSOs and inflow / infiltration: Sanitary sewer pipe sealed, lined, and / or replaced (linear feet)</td> <td data-bbox="1119 979 1349 1037">0</td> <td data-bbox="1349 979 1602 1037"></td> <td data-bbox="1602 979 1832 1037"></td> <td data-bbox="1832 979 2045 1037"></td> </tr> <tr> <td data-bbox="236 1037 1119 1095">Activity to reduce/eliminate SSOs and inflow / infiltration: Sanitary sewer line breaks repaired</td> <td data-bbox="1119 1037 1349 1095">0</td> <td data-bbox="1349 1037 1602 1095"></td> <td data-bbox="1602 1037 1832 1095"></td> <td data-bbox="1832 1037 2045 1095"></td> </tr> <tr> <td data-bbox="236 1095 1119 1153">Activity to reduce/eliminate SSOs and inflow / infiltration: Septic systems removed</td> <td data-bbox="1119 1095 1349 1153">0</td> <td data-bbox="1349 1095 1602 1153"></td> <td data-bbox="1602 1095 1832 1153"></td> <td data-bbox="1832 1095 2045 1153"></td> </tr> <tr> <td data-bbox="236 1153 1119 1210">Activity to reduce/eliminate SSOs and inflow / infiltration: Emergency generator added</td> <td data-bbox="1119 1153 1349 1210">0</td> <td data-bbox="1349 1153 1602 1210"></td> <td data-bbox="1602 1153 1832 1210"></td> <td data-bbox="1832 1153 2045 1210"></td> </tr> <tr> <td data-bbox="236 1210 1119 1268">SSO incidents discovered</td> <td data-bbox="1119 1210 1349 1268">0</td> <td data-bbox="1349 1210 1602 1268"></td> <td data-bbox="1602 1210 1832 1268"></td> <td data-bbox="1832 1210 2045 1268">No Sewer Overflows in Year 2</td> </tr> <tr> <td data-bbox="236 1268 1119 1318">SSO incidents resolved</td> <td data-bbox="1119 1268 1349 1318">0</td> <td data-bbox="1349 1268 1602 1318"></td> <td data-bbox="1602 1268 1832 1318"></td> <td data-bbox="1832 1268 2045 1318"></td> </tr> <tr> <td data-bbox="236 1318 1119 1343">Inflow / infiltration incidents discovered</td> <td data-bbox="1119 1318 1349 1343">0</td> <td data-bbox="1349 1318 1602 1343"></td> <td data-bbox="1602 1318 1832 1343"></td> <td data-bbox="1832 1318 2045 1343"></td> </tr> <tr> <td data-bbox="236 1343 1119 1376">Inflow / infiltration incidents resolved</td> <td data-bbox="1119 1343 1349 1376">0</td> <td data-bbox="1349 1343 1602 1376"></td> <td data-bbox="1602 1343 1832 1376"></td> <td data-bbox="1832 1343 2045 1376"></td> </tr> <tr> <td data-bbox="236 1376 1119 1409">Name of owner of the sanitary sewer system</td> <td colspan="5" data-bbox="1119 1376 2045 1409">City of Eagle Lake</td> </tr> </table>					Activity to reduce/eliminate SSOs and inflow / infiltration: Sanitary sewer pipe inspected for infiltration (linear feet)	0				Activity to reduce/eliminate SSOs and inflow / infiltration: Sanitary sewer pipe sealed, lined, and / or replaced (linear feet)	0				Activity to reduce/eliminate SSOs and inflow / infiltration: Sanitary sewer line breaks repaired	0				Activity to reduce/eliminate SSOs and inflow / infiltration: Septic systems removed	0				Activity to reduce/eliminate SSOs and inflow / infiltration: Emergency generator added	0				SSO incidents discovered	0			No Sewer Overflows in Year 2	SSO incidents resolved	0				Inflow / infiltration incidents discovered	0				Inflow / infiltration incidents resolved	0				Name of owner of the sanitary sewer system	City of Eagle Lake				
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Part III.A.8.a	Industrial and High-Risk Runoff — Identification of Priorities and Procedures for Inspections																																																							

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE							
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Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity			Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments
	EPCRA Title III, Section 313 facilities (that are not landfills or HWTSDR facilities)	0					
	Facilities determined as high risk by the permittee through the proactive inspections as per Part III.A.7.c	0					
	Other facilities determined as high risk by the permittee (that are <u>not</u> facilities identified through the proactive inspections)	0	0	0	0		
Part III.A.8.b	Industrial and High-Risk Runoff — Monitoring for High Risk Industries						
	<p>Sampling of the discharge to the stormwater system may be required on an as-needed basis in the event that inspections of high-risk facilities disclose suspected illicit discharges to the MS4. New high-risk industrial facilities as defined in 40 CFR 122.26(d)(2)(iv)(C) must be evaluated to determine if the new discharge is contributing a substantial pollutant load to the MS4. The evaluation may include site-specific monitoring. Report the number of high risk facilities sampled. If a permittee relies on Polk County to conduct these activities on its behalf, the permittee shall obtain (and, upon request, Polk County shall make available) the necessary annual report information from the County.</p> <p><i>DEP Note: Polk County is to report ONLY the number of high risk facilities in the unincorporated areas of Polk County that were sampled – the high risk facilities located in the co-permittees' jurisdictions that were sampled by the County are to be reported by the co-permittees.</i></p>						
	High risk facilities sampled						
Part III.A.9.a	Construction Site Runoff — Site Planning and Non-Structural and Structural Best Management Practices						
	<p>Continue to implement the local codes or land development regulations and the written pre-construction site plan review procedures that require the use and maintenance of appropriate structural and non-structural erosion and sedimentation controls during construction to reduce the discharge of pollutants to the MS4. Report the number of permittee and private pre-construction site plans reviewed for stormwater, erosion, and sedimentation controls, and the number approved.</p> <p><i>DEP Note: Please provide an explanation in Column F for any "0" reported in Column C.</i></p>						
	PERMITTEE SITES: Construction site plans reviewed	0					
	PERMITTEE SITES: Construction site plans approved	0					
	PRIVATE SITES: Construction site plans reviewed	6			Building Inspection Form	Building Inspection	
	PRIVATE SITES: Construction site plans approved	6			Building Inspection Form	Building Inspection	
	<p>Annually review (and revise, as needed) and implement the permittee's written procedures to notify all new development / redevelopment permit applicants of the need to obtain all required stormwater permits. Report the number of new development/redevelopment permit applicants notified of the ERP and CGP, and the number of applicants who confirmed ERP and CGP coverage.</p> <p><i>DEP Note: Please provide an explanation in Column F for any "0" reported in Column C. If the number of applicants notified of ERP or CGP coverage is less than the number of construction site plans reviewed, please provide an explanation for the discrepancy in Column F.</i></p>						
	Notified of ERP stormwater permit requirements						
	Confirmed ERP coverage						
	Notified of CGP stormwater permit requirements						

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A.	B.	C.	D.	E.	F.
Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity	Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments
Confirmed CGP coverage					
Part III.A.9.b	Construction Site Runoff — Inspection and Enforcement				
<p>As an attachment to the Year 1 Annual Report, the permittee shall submit a written plan that details the standard operating procedures for implementation of the stormwater, erosion and sedimentation inspection program for construction sites discharging stormwater to the MS4. The permittee shall implement the plan for inspecting construction sites immediately upon written approval by the Department. Prior to Department approval, the permittee shall continue to perform inspections in accordance with its previously developed construction site inspection procedures. Report on the inspection program for privately-operated and permittee-operated construction sites, including the number of active construction sites during the reporting year, the number of inspections of active construction sites, the percentage of active construction sites inspected, and the number and type of enforcement actions / referrals taken.</p> <p><i>DEP Note: If "0" is reported in Column C for the number of inspections conducted, please provide an explanation in Column F of why no inspections were conducted. If the number of inspections reported is equal to or less than the number of active construction sites, or the percentage inspected is less than 100%, please provide an explanation in Column F. In addition, the permittee should re-word the "NOVs / warning letters / citations issued" reporting item to more accurately reflect its particular initial enforcement activity, if necessary.</i></p> <p><i>DEP Note: Refer to Part III.A.9.b of the permit for what must be included in the construction site inspection program plan. Please provide the title of the attached plan in Column D and the name of the entity who finalized the plan in Column E.</i></p>					
PERMITTEE SITES: Active construction sites		0			
PERMITTEE SITES: Inspections of active construction sites for proper stormwater, erosion and sedimentation BMPs		0			
PERMITTEE SITES: Percentage of active construction sites inspected		0			
PRIVATE SITES: Active construction sites			Building Inspection	Building Inspector	
PRIVATE SITES: Inspections of active construction sites for proper stormwater, erosion and sedimentation BMPs					
PRIVATE SITES: Percentage of active construction sites inspected		100%			
Red Tags issued		0			
Notices of Violation (NOVs) issued		0			
Stop Work Orders issued		00			
Fines issued		0			
Year 1 ONLY: Attach the written construction site inspection program plan					
Part III.A.9.c	Construction Site Runoff — Site Operator Training				
<p>During Year 1 of the permit, develop and implement a written plan for stormwater training / outreach for construction site plan reviewers, site inspectors and site operators. Provide training for permittee personnel (employed by or under contract with the permittee) involved in the site plan review, inspection or construction of stormwater management, erosion, and sedimentation controls. Also provide training for private construction site operators. All permittee inspectors (employed by or under contract with the permittee) of construction sites shall be certified through the Florida Stormwater, Erosion and Sedimentation Control Inspector Training program, or an equivalent program approved by the Department. Refresher training shall be provided annually. Report the type of training activities, the number of inspectors, site plan reviewers and site operators trained (both in-house and outside training), and the number of private construction site operators trained by the permittee.</p>					

SECTION VII. STORMWATER MANAGEMENT PROGRAM (SWMP) SUMMARY TABLE

A.	B.			C.	D.	E.	F.
Permit Citation/ SWMP Element	Permit Requirement/Quantifiable SWMP Activity			Number of Activities Performed	Documentation / Record	Entity Performing the Activity	Comments
<p><i>DEP Note: If "0" is reported for any of these reporting items, please include in Column F an explanation of why training was not provided to / obtained by the permittee's staff and private construction site operators during the applicable reporting year.</i></p>							
<p><i>DEP Note: The permittee should report only the number of staff and private construction site operators trained / certified during the applicable reporting year, and then note in Column F the number of staff who were previously trained / certified. Private site operator training can include pre-construction meetings.</i></p>							
	Inspector Certification Training	Non-Inspector Initial Training (non-certification)	Refresher Training				
Permittee construction site inspectors	2		1				
Permittee construction site plan reviewers		0					
Permittee construction site operators		0					
Private construction site operators		0					

SECTION VIII. EVALUATION OF THE STORMWATER MANAGEMENT PROGRAM (SWMP)

Permit Citation/ SWMP Element	SWMP EVALUATION
Part II.A.1 Structural control inspection and maintenance	Strengths: 100% of Structural Controls, and outlets inspected, cleaned and repaired (If needed)each year, and has been done that way for the last 8 years
	Weaknesses: None, because of small amount of outlets, We have to stay on top of this – could change when population grows
	SWMP Revisions to address deficiencies: Same response as in Year 1
Part II.A.2 Significant redevelopment	Strengths: A strength is the hiring of professional engineer to guide us in development process, and coordination between engineer, PW Director and Manager
	Weaknesses: Untested - No development in Eagle Lake for 5 years
	SWMP Revisions to address deficiencies: same Response as in Year 1
Part II.A.3 Roadways	Strengths: More frequent litter collection in Year 2 - more material picked up – less chance for pollution
	Weaknesses: No street sweeper so the effort not as complete as could be
	SWMP Revisions to address deficiencies: Revised Procedures from Year 1
Part II.A.4 Flood control	Strengths: When Bingham Project done City will have accomplished all recommendation in Storm water Master Plan
	Weaknesses: Storm water utility fee study done and recommendations on fee level are tripling of storm water fees to finance activities. May not be approved by commission. Discussion to be done in 14-15 budgeting on how to raise fees to recommended levels
	SWMP Revisions to address deficiencies:
Part II.A.5 Waste TSD Facilities	Strengths: City only has 1 Public Works area, and this is inspected by Polk County Natural Resources/Health Department/City Staff. All liquids located INSIDE Bldg
	Weaknesses: Road materials(Rock/sand) kept in bins outside (Same Response as in Year 1)
	SWMP Revisions to address deficiencies:
Part II.A.5 Waste TSD Facilities	Strengths: No City landfills or transfer stations
	Weaknesses:
	SWMP Revisions to address deficiencies:
Part II.A.6 Pesticide, herbicide, fertilizer application	Strengths: Two Personnel trained and certified/Pesticide put in ONLY specified areas and specific time of year
	Weaknesses: Ant poison applied prior to BBQ Festival/Herbicide prior to baseball season - proximity to high traffic areas No Training in Year 2
	SWMP Revisions to address deficiencies: Training to be scheduled for Year 3

A.

SECTION VIII. EVALUATION OF THE STORMWATER MANAGEMENT PROGRAM (SWMP)

	Part II.A.7 Illicit Discharge Detection and Elimination	Strengths: Information disseminated by Summer Recreation Program/Polk County Fire Personnel located in Eagle Lake/Reminders in NEWSLETTER/ regular inspections of catch basins/outlets/retention ponds reduces likelihood of illegal dumping
		Weaknesses: Small Staff and growing City - likelihood of illegal dumping increases as proper disposal cost increases
		SWMP Revisions to address deficiencies:
	Part II.A.8 High Risk Industry Runoff	Strengths: No high risk industries in Eagle Lake yet, must maintain inspection schedule to ensure dumping not done here from other city.
		Weaknesses: Small Staff and growing City and area. Railroad near southern part of City
		SWMP Revisions to address deficiencies: Same response as Year 1
	Part II.A.9 Construction Site Runoff	Procedures for development review with Professional engineer – building official with 25 years experience – Professional Contract Planner to provide assistance. Good interaction between Planner/Building Official /Manager
		Weaknesses: A weakness could be the speed of development. No problem now, but once economy picks up could make for difficulties. Also since no development for 5 years procedures largely untested
		SWMP Revisions to address deficiencies: (Same Response as Year 1)

SECTION IX. CHANGES TO THE STORMWATER MANAGEMENT PROGRAM (SWMP) ACTIVITIES (Not Applicable In Year 4)

A.	Permit Citation/ SWMP Element	Proposed Changes to the Stormwater Management Program Activities Established as Specific Requirements Under Part III.A of the Permit (Including the Rationale for the Change) — REQUIRES DEP APPROVAL PRIOR TO CHANGE IF PROPOSING TO REPLACE OR DELETE AN ACTIVITY. <i>DEP Note: There may be changes deemed necessary after developing / reviewing your plans and SOPs as per Part III.A of the permit, after completing your SWMP evaluation as per Part VI.B.2 of the permit, or due to a TMDL / BMAP as per Part VIII.B of the permit.</i>
		Procedure presented are new, no changes contemplated until more experience Same Response as in Year 1
B.	Permit Citation/ SWMP Element	Changes to the Stormwater Management Program Activities NOT Established as Specific Requirements Under Part III.A of the Permit (Including the Rationale for the Change) <i>DEP Note: There may be changes deemed necessary after developing / reviewing your plans and SOPs as per Part III.A of the permit, after completing your SWMP evaluation as per Part VI.B.2 of the permit, or due to a TMDL / BMAP as per Part VIII.B of the permit.</i>

CHECKLIST A: ATTACHMENTS TO BE SUBMITTED WITH THE ANNUAL REPORTS

Below is a list of items required by the permit that may need to be attached to the annual report. Please check the appropriate box to indicate whether the item is attached or is not applicable for the current reporting period. Please provide the number and the title of the attachments in the blanks provided.

Attached	N/A	Rule / Permit Citation	Required Attachment	Attachment Number	Attachment Title
<input type="checkbox"/>	X <input type="checkbox"/>	Part II.F	EACH ANNUAL REPORT: If program resources have decreased from the previous year, a discussion of the impacts on the implementation of the SWMP.		
<input type="checkbox"/>	X <input type="checkbox"/>	Part III.A.1	EACH ANNUAL REPORT: An explanation of why the minimum inspection frequency in Table II.A.1.a was not met, if applicable.		
<input type="checkbox"/>	X <input type="checkbox"/>	Part III.A.4	EACH ANNUAL REPORT: A list of the flood control projects that did <u>not</u> include stormwater treatment and an explanation for each of why it did not, if applicable.		
<input type="checkbox"/>	X <input type="checkbox"/>	Part III.A.7.a	EACH ANNUAL REPORT: A report on amendments / changes to the legal authority to control illicit discharges, connections, dumping, and spills, if applicable.		
<input type="checkbox"/>	X <input type="checkbox"/>	Part V.B.9	EACH ANNUAL REPORT: Reporting and assessment of monitoring results. [Also addressed in Section III of the Annual Report Form]		
<input type="checkbox"/>	X <input type="checkbox"/>	Part VI.B.2	EACH ANNUAL REPORT: An evaluation of the effectiveness of the SWMP in reducing pollutant loads discharged from the MS4 that, <u>at a minimum</u> , must include responses to the questions listed in the permit.		
<input type="checkbox"/>	X <input type="checkbox"/>	Part VIII.B.3.e	EACH ANNUAL REPORT: A status report on the implementation of the requirements in this section of the permit and on the estimated load reductions that have occurred for the pollutant(s) of concern.		
<input type="checkbox"/>	X <input type="checkbox"/>	Part VIII.B.4.f	EACH ANNUAL REPORT after approval of the BPCP: The status of the implementation of the Bacterial Pollution Control Plan (BPCP).		
<input type="checkbox"/>	x	Part III.A.1	YEAR 1: An inventory of all known major outfalls and a map depicting the location of the major outfalls (hard copy or CD-ROM).		
<input type="checkbox"/>	<input type="checkbox"/> x	Part III.A.3	YEAR 1: If have curbs and gutters but no street sweeping program, an explanation of why no street sweeping program and the alternate BMPs used or planned.		
x	<input type="checkbox"/>	Part III.A.6	YEAR 1 or YEAR 2: A copy of the adopted Florida-friendly Ordinance, if applicable.	3.	
<input type="checkbox"/>	xx	Part III.A.7.c	YEAR 1: A proactive illicit discharge / connection / dumping inspection program plan.		
<input type="checkbox"/>	x	Part III.A.9.b	YEAR 1: A construction site inspection program plan. [For approval by DEP]		
x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.2	YEAR 2: A summary report of a review of codes and regulations to reduce the stormwater impact from new development / redevelopment.	4.	
<input type="checkbox"/>	X <input type="checkbox"/>	Part V.A.2	YEAR 3: Estimates of annual pollutant loadings and EMCs, and a table comparing the current calculated loadings with those from the previous two Year 3 ARs.		
<input type="checkbox"/>	X <input type="checkbox"/>	Part III.A.2	YEAR 4: A follow-up report on plan implementation of changes to codes and regulations to reduce the stormwater impact from new development / redevelopment.		
<input type="checkbox"/>	X <input type="checkbox"/>	Part V.A.3	YEAR 4: If the total annual pollutant loadings have not decreased over the past two permit cycles, revisions to the SWMP, as appropriate.		
<input type="checkbox"/>	X <input type="checkbox"/>	Part V.B.3	YEAR 4: The monitoring plan (with revisions, if applicable).		
<input type="checkbox"/>	X <input type="checkbox"/>	Part VII.C	YEAR 4: An application to renew the permit.		
<input type="checkbox"/>	X <input type="checkbox"/>	Part VIII.B.3.d	YEAR 4: A TMDL Implementation Plan / Supplemental SWMP.		

CHECKLIST B: THE REQUIRED ANNUAL REVIEWS OF WRITTEN STANDARD OPERATING PROCEDURES (SOPs) & PLANS

The permit requires annual review, and revision if needed, of written Standard Operating Procedures (SOPs) and plans (e.g., public education and outreach, training, inspections). Please indicate your review status below. **If you have made revisions that need DEP approval, you must complete Section VIII.A of the annual report.**

Did not complete review of existing SOP / Plan	Developed <u>new</u> written SOP / Plan	Reviewed & <u>no revision needed</u> to existing SOP / Plan	Reviewed & <u>revised</u> existing SOP / Plan	Permit Citation	Description of Required SOPs / Plans
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.1	SOP and/or schedule of inspections and maintenance activities of the structural controls and roadway stormwater collection system. -5-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.2	SOP for development project review and permitting procedures and/or local codes and regulations for new development / areas of significant development. -6-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	Part III.A.3	SOP for the litter control program. -7-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.3	SOP for the street sweeping program. -7-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.3	SOP for inspections of equipment yards and maintenance shops that support road maintenance activities. -8-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.5	SOP for inspections of waste treatment, storage, and disposal facilities not covered by an NPDES stormwater permit. -8-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.6	public education and outreach on reducing the use of pesticides, herbicides and fertilizer. -9-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.6	SOP for reducing the use of pesticides, herbicides and fertilizer, and for the proper application, storage and mixing of these products. -10-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.c	Plan for proactive illicit discharge / connections / dumping inspections.* -11-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.c	SOP for reactive illicit discharge / connections / dumping investigations. -12-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.c	Plan for illicit discharge training. -13-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.d	SOP for spill prevention and response efforts. -14-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.d	Plan for spill prevention and response training. -15-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.e	Plan for public education and outreach on how to identify and report the illicit discharges and improper disposal to the MS4. -16-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.f	Plan for public education and outreach on the proper use and disposal of oils, toxics and household hazardous waste. -17-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.7.g	SOP to reduce / eliminate sanitary wastewater contamination of the MS4. -18-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.8	SOP for inspections of high risk industrial facilities. -19-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.9.a	SOP for construction site plan review for stormwater, erosion and sedimentation controls, and ERP and CGP coverage. -19-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.9.b	Plan for inspections of construction sites.* -19-
<input type="checkbox"/>	<input type="checkbox"/>	x <input type="checkbox"/>	<input type="checkbox"/>	Part III.A.9.c	Plan for stormwater, erosion and sedimentation BMPs training. -20-

* Revisions to these plans require DEP approval – please complete Section VIII.A of the annual report.

REMINDER LIST OF THE TMDL / BMAP REPORTS TO BE SUBMITTED SEPARATELY FROM AN ANNUAL REPORT

Rule / Permit Citation	Report Title	Due Date
Part VIII.B.3.a	6 MONTHS from effective date of permit: TMDL Prioritization Report.	3/12/12
Part VIII.B.3.b	12 MONTHS from effective date of permit: TMDL Monitoring and Assessment Plan.	
Part VIII.B.3.c	6 MONTHS from receiving analyses from the lab: TMDL Monitoring Report.	TBD
Part VIII.B.4	30 MONTHS from start date per TMDL Prioritization Report: A Bacterial Pollution Control Plan (BPCP).	TBD

BMAP Reporting

MS4 permittees are NOT required to submit the annual report required by any BMAP that applies to them since the NPDES Stormwater Staff can obtain them from the department's Watershed Planning and Coordination staff. However, to assure that the stormwater staff are aware of which BMAPs apply to the MS4 permittees and when the latest BMAP annual report was submitted, please complete the information below, if applicable:

Rule/Permit Citation	BMAP Title	Date BMAP Annual Report Submitted to DEP
Part VIII.B.2		

**END OF REVISED TAILORED MS4 AR FORM
CYCLE 3 PERMIT**

STANDARD OPERATING PROCEDURES FOR LITTER CONTROL PROGRAM

1. Once every week Public Works Personnel will obtain prisoners and collect trash on US #17; Eagle Avenue; around City Hall and around the Ballfield and parks and other public areas in City. All material collected will be placed in the 3 yard Florida Refuse Dumpster, to be taken by Florida Refuse to the landfill. The dumpster is usually full after this collection.
2. Four Times a year, usually in the months of July; October; January and April, Public Works Personnel will obtain prisoners and travel City roads, especially stopping where there is curb and gutter, and clean the area of all dirt, grass and debris of any kind. All material collected will be placed in the 3 yard Florida Refuse dumpster. Dumpster is usually full from these events also.
3. The City does not have a formal street sweeping program because the City of Eagle Lake does not have a street sweeper, and that is because 95% of the roads in Eagle Lake do not have curb and gutter. While the City has contacted USA Services of Orlando, the contractor for the County, It is felt hand work by the prisoners is more effective on non-curb streets that mechanized cleaning. Also, most of the curbed streets inside Eagle Lake are being swept by FDOT and Polk County.

PART III A.3 Roadways

STANDARD OPERATING PROCEDURE FOR STREET SWEEPING PROGRAM

The City of Eagle Lake Public Works Director; Building Official; Contract Planner; and City Manager have reviewed the Eagle Lake Land Development Regulations and related ordinances to determine needed changes to address deficiencies in regulations surrounding new home development or new home construction, or any problems in the process leading to development of new commercial or residential properties. Similarly, if there are steps in the process that seem to carry large benefits for the City, those beneficial steps should also be identified.

The City of Eagle Lake has had no large scale developments undertaken for approximately 7 years. It should be noted, however, that of the developments which were begun in the 2004-2008 period, the streets, water and sewer improvements have been installed, yet there are still approximately 400 available lots in these built out subdivisions. Over the last 4 years the City has experienced approximately 10 new homes built each year. Due to the large number of vacant, available lots in Eagle Lake, and the small number of new homes built each year, it should be a few years before new. Large scale development projects are started in Eagle Lake. It is felt that as the economy improves new home construction in Eagle Lake will accelerate with it, but it is very likely that the new homes will first be constructed on available lots. Once available lots are being filled up, ONLY THEN will new development be started.

In the discussion of the planner, manager, building official and public works director, the following points were made:

- Included in our Code is the requirement that when a new development is in the concept stage the developer meets with the public works director, manager, building official and planner to identify responsibilities and expectations of all parties. It was felt that this step in the process works well for everyone. The manager, building official, and planner all referenced experiences in Eagle Lake, but also in other cities where they have served, to support this position.
- The next step in the process, should the developer move forward on the development, is for the City to obtain the services of a consulting engineer to serve as the City's agent in reviewing the technical aspects(plans) for the development. The hiring of a consulting engineer to assist in plan review was supported by everyone based on positive experiences everyone has had while working for Eagle Lake as well as other cities, and the experiences go back for 20 years. In some instances the improvements were installed 20 years ago, and are still functioning properly because of proper planning and proper oversight in the installation of improvements.
- Another procedure particular to Eagle Lake is silt fencing of the complete development, but also silt fencing on each particular lot when the home is constructed. The City has received some criticism since most other communities only require silt fencing around the development, not the individual lot. The way it is done in Eagle Lake allows the public streets to remain cleaner so the City is sticking with our silt screening procedures.

These are three important points to come out of our review. The four of us intend to periodically meet together to review the codes and procedures in the future.

STANDARD OPERATING PROCEDURES FOR DEVELOPMENT REVIEW PROJECTS FOR
NEW DEVELOPMENT AND REDEVELOPMENT AND PLANS FOR INSPECTION OF
CONSTRUCTION SITES

The Standard Operating procedures for storm water sedimentation, and erosion control program will cover what will be done for large scale developments, and redevelopments, and will continue beyond completion of the large scale development down to the construction of the individual home. The procedures will be in place for residential development and redevelopment, and commercial development and redevelopment.

Large Scale developments and Redevelopments

1. At the conceptual stage of a large scale development or redevelopment, the developer; the developer's engineer; the Eagle Lake Building Official; the Eagle Lake Public Works Director; the Eagle Lake City Manager and the Eagle Lake Contract planner, Joel Ivey, will schedule a meeting where the procedure for development of the preliminary plat will be discussed. The City Officials constitute the Development Review Committee. The Development Review Committee will inform the developer that if the development proceeds the City will be hiring a consulting engineer to represent the City's interest in technical review of the development plans. Finally, again, if the development proceeds, the City informs the developer he or she will need to get an Environmental Resource Permit from the Water Management District and coverage under NPDES Construction Generic Permit from FDEP(Information can be downloaded from FDEP Website)
2. If the developer, after the initial meeting, proceeds with the development, or redevelopment, the next step is for the developer's engineer to prepare the preliminary site plan and the developer also begins the permitting process. A storm water management plan for the development is created.
3. The Preliminary Site Plan, including the storm water management plan, is reviewed by the Development Review Committee together with the City's consulting engineer for this project, and other affected parties which could include Polk County Transportation or FDOT, Polk County Fire/Rescue, or Polk Natural Resources Department, and the City Police(Sheriff) depending on the location of the development. Comments are compiled from all parties and the Preliminary Site Plan is returned to the developer with the comments.
4. Developer makes changes to address the comments, with City being advised of status of developer in permitting process with other agencies
5. The Preliminary Plat is then re-submitted to the City planning Commission for review and approval; development of construction plans and specifications commences upon approval of Preliminary Plat
6. Detailed Construction Plans are then completed and submitted to City Planning Commission for approval. At the time of submission of detailed construction plans evidence must be submitted that all required permits from other agencies, such as Water Management; FDEP; FDOT; etc have been obtained.
7. Construction can then begin on the infrastructure for the development after the developer and Development Review Committee hold a pre-construction meeting. Development Review

Committee representatives along with the City's consulting engineer for this development will oversee installation of the infrastructure to ensure everything is installed according to the approved plans, and all aspects of the storm water management plan are followed. The Public Works Director, under the guidance of the City consulting engineer, will visit the site daily to ensure adherence to the plans. Deviation from approved construction or storm water management plans will result in stop work orders. The Public Works Director will maintain a permanent file for inspection reports for infrastructure for each development. After completion of infrastructure construction a copy of the accepted as built plans will be kept in the Public Works Director's office. Another copy of the as built plans, together with the file for inspection reports for each development will be given to the City Clerk for a permanent file at City Hall.

8. Assuming construction follows the plans, approval can be requested at the completion of construction, with a final inspection from the City's consulting engineer together with the developer, developer's engineer, members of the Development Review Committee, and submission of a complete set of as built plans as approved by the City. The Planning Commission and City Commission will take final action to accept the improvements.
9. After the improvements are accepted by the City, lots can be sold. The Eagle Lake Building Official primarily, and the Public Works Director in a smaller way, will be involved in the permitting, inspection and certificate of occupancy on each house, with the process as follows:
 - a) The contractor meets the Building Official, informs him of where the house is to be built, and submits a site plan for concurrence with set back and side yard requirements, and a set of construction plans for the house;
 - b) The Building Official reviews the plans and either requires changes or approves the plans, and lets the Public Works Director know of the planned house construction
 - c) Before any construction starts a silt screen fence is installed around the property to ensure all debris from construction remains on site. The Public Works Director completes an inspection report showing when the silt screen first erected
 - d) During construction, the Building Official will visit the site for the following inspections:
 - Footer Inspection
 - Rough Plumbing
 - Slab
 - Lintel Inspection
 - Framing Inspection
 - Final InspectionThe Building Official, when visiting the site for the above inspections, will also check the integrity of the silt screening to ensure proper maintenance and that no debris leaves the site. Documentation of the condition of the silt fence at each inspection is to be noted in the section of the inspection form for storm water. The Public Works Director, in his daily travel through Eagle Lake, will note on the inspection form for this property, every time this property is viewed.
 - e) The certificate of occupancy is issued by the Building Official after construction is complete and approved, and the property passes a final inspection. The silt screening is then removed, and the lot is seeded or covered with sod.

A commercial property, such as Dollar General, will follow the same process as the individual home.

Special Note: This Procedure has been reviewed by the Development Review Committee on Wednesday, February 19, 2014, in accord with the requirements for the Year 2 submittal. Since the City of Eagle Lake has had no developments since 2007, these procedures are largely untested but continue to be in place should a development happen in Eagle Lake.

STANDARD OPERATING PROCEDURES FOR DEVELOPMENT REVIEW PROJECTS
FOR NEW DEVELOPMENT AND REDEVELOPMENT, AND PLANS FOR INSPECTION OF
CONSTRUCTION SITES

Explanation for increased Litter Collection

The Public Works Department of the City of Eagle Lake was able to get prisoners for trash/litter collection EVERY WEEK in 2013-13. As such, the City was able to collect more trash from Roadways. Hence our estimated quantity went from 36 cubic yards per year to approximately 80 cubic yards per year.

STANDARD OPERATING PROCEDURE FOR STREET SWEEPING PROGRAM

The City of Eagle Lake does not own a street sweeper, and does not have a street sweeping program with a street sweeper. The City does have prisoners, on a regular basis pick up litter and clean out gutters. It is estimated that 95% of the streets in Eagle lake do not have curb and gutter, and of those streets that do have curb and gutter, such as US #17, the street falls under the jurisdiction of the FDOT or Polk County, with the sweeping being done by another entity.

The litter control program for the City is repeated in the following pages. It is estimated that about 5 miles, or 28,000 linear feet of roadway is maintained by Public Works crew and prisoners

STANDARD OPERATING PROCEDURES FOR INSPECTIONS OF EQUIPMENT YARDS AND
MAINTENANCE SHOPS THAT SUPPORT ROAD MAINTENANCE ACTIVITIES

Part III A.3

STANDARD OPERATING PROCEDURES FOR INSPECTIONS OF EQUIPMENT YARDS AND MAINTENANCE SHOPS THAT SUPPORT ROAD MAINTENANCE ACTIVITIES

The City of Eagle Lake does not have a municipal landfill or transfer station. The City does have a public works shed and equipment yard. The public works shed/equipment yard is adjacent to our main water plant, and the water plant is beneath our elevated water tank, and over water well #1.

Inspections: There is one inspection per year performed by Public Works Personnel in January, and the municipal maintenance yard inspection check list form is completed and kept in the maintenance log. There is a second yearly inspection done in June of the public works area by the Polk County Department of Parks and natural Resources personnel. Any findings from either the City inspection or by Polk County personnel are corrected immediately.

There are also periodic inspections by the Polk County Health Department because of the water plant and water well #1 being on site

STANDARD OPERATING PROCEDURE TO REDUCE POLLUTION FROM THE PUBLIC WORKS AREA

1. All storage of oil (new or used), chemicals, or fertilizer will be locked inside the shop
2. After oil is changed in vehicles, used oil is collected immediately and taken to the Advance Auto Parts Recycling Center in Eloise;
3. Sand Mulch and Limerock will be kept in the concrete storage bins at the Public Works Shed
All material is to be placed in the concrete bins, with no other material to be stored outside except those materials in the bins;
4. Due to the proximity of the water well, no chemicals are to be stored outside on site

Part III A. 5

STANDARD OPERATING PROCEDURES FOR INSPECTIONS OF WASTE TREATMENT,
STORAGE AND DISPOSAL FACILITIES NOT COVERED BY AN NPDES PERMIT

The City of Eagle Lake has lift stations, but does not have waste treatment, storage and disposal facilities not covered by an NPDES permit. Our only storage facility is the public works shed, and our standard operating procedures have been detailed under Part III A.3

1. The City of Eagle Lake uses the services of Florida Pest Control for termite control and for all other significant pest problems. Florida Pest Control has presented the City with licenses and certifications from the State of Florida as a licensed pest control applicator.
2. City personnel do apply ant poison and herbicide for only the following:
 - City personnel will apply ant poison in March prior to the Eagle Lake BBQ Festival to Railroad Park
 - City personnel will apply herbicide to the fences at the ball field in February prior to Baseball season
3. All pesticides and herbicides are purchased as needed, and only for that specific activity. Any product not used is stored inside the shop office until needed.

Part III A.6

STANDARD OPERATING PROCEDURES FOR REDUCING THE USE OF PESTICIDES; HERBICIDES AND FERTILIZER, AND FOR PROPER APPLICATION AND STORAGE OF THESE MATERIALS

STANDARD OPERATING PROCEDURES FOR PUBLIC EDUCATION AND
OUTREACH ON REDUCING THE USE OF PESTICIDES AND FERTILIZER

PART III A.6

STANDARD OPERATING PROCEDURES FOR PUBLIC EDUCATION AND OUTREACH ON REDUCING THE USE OF PESTICIDES AND FERTILIZER

1. The City of Eagle Lake has a NEWSLETTER which is sent quarterly to 1500 households in and around Eagle Lake. We have run, and will continue to run, articles about reducing the use of pesticides and fertilizer, and about the proper procedures for applying pesticides and fertilizer
2. The City maintains a display at City Hall on storm water topics, including proper use of pesticides and fertilizer
3. The City operates a summer recreation program serving 60 children. The summer recreation program has ecology as a theme. Various programs on ecology are presented, and fertilizer and pesticide use are covered. The idea is that if we alert children to proper methods, they will bug their parents into doing things correctly.

PART III A.6 Pesticides, Fertilizer, Herbicide Application Training

The Public Works staff obtained certification in pesticide, fertilizer and herbicide application in Year 1. Because of projects such as the Bingham Stormwater project, and the lift station project the personnel were not able to take training during Year 2.

Part III A. 7 c PLAN FOR ILLICIT DISCHARGE TRAINING

Training: The City Manager and the Public Works Superintendent and Assistant Public Works Superintendent will be the individuals to take the training. The Public Works Director and Assistant Public Works Director obtained Florida storm water and sedimentation control inspector certification in 2012. In September 2012, through the Cooperative Extension Service both people attended training on best management practices for pesticides and fertilizer application. The City hopes to schedule yearly training in the future through Polk County.

PUBLIC EDUCATION PROGRAM FOR ILLICIT DISCHARGES AND IMPROPER DISPOSAL

Part III A.7.e

PUBLIC EDUCATION PROGRAM FOR ILLICIT DISCHARGES AND IMPROPER DISPOSAL

The City of Eagle Lake has an information stand inside the entrance to City Hall where we stock pamphlets containing information about the hazards to our lakes of dumping chemicals and oils into storm drains. Additionally, the City of Eagle Lake uses the following venues to disseminate information to our residents about proper disposal methods:

- The City publishes a quarterly NEWSLETTER which is sent to 1500 households in the Eagle Lake area. The Newsletter is used as a vehicle for providing our people with information of interest to our community. It is our intention to use the NEWSLETTER to educate our people on the importance of preventing chemical spills; proper disposal of chemicals; and, if there is a spill, what the person should do to report the spill so it can be properly cleaned up.
- The City of Eagle Lake operates a website. Periodically we will post information about proper disposal of oils and chemicals, and a link is provided to a complaint form which can be completed to inform us of a discharge or spill so that we can have it cleaned up.
- The City of Eagle Lake has a summer recreation program serving 60 children. The theme of the summer recreation program is ecology and the environment. The children learn about the environment, and the proper use of pesticides and fertilizers in the hope they will take that information back to their parents.

STANDARD OPERATING PROCEDURES AND PLAN FOR REACTIVE INSPECTIONS

Part III A. 7 c

STANDARD OPERATING PROCEDURES AND PLAN FOR REACTIVE INSPECTIONS

- a. The City of Eagle Lake has established a website, and on our home page, in the upper right hand corner, under important information, a contact form is listed. On the form people can register a complaint, such as a complaint about illegal dumping, and the complaint will be given to the City Manager.
- b. As an example, a complaint is received. If the complaint is received from the website complaint form a copy is printed and given to the City Manager, who then gives a copy to the Public Works Superintendent and Sheriff's Office. If the complaint is delivered in person through a visit to City Hall, or via telephone, the person or call is given to the manager, who then gives it to the Public Works Superintendent and Sheriff's Office. If the City manager is not there the complaint is given directly to the Public Works Superintendent and Sheriff's Office.
- c. The initial investigation is done by Public Works personnel. If a substance is found, the appropriate agencies(Polk Fire/Rescue or Polk Natural Resources) are notified to assist in the investigation. Testing of the substance is done, and if it is found to be hazardous Polk Natural Resources and Polk Fire Rescue will advise on clean up. If the substance is not hazardous, Public Works personnel will clean up. At the same time as clean up is occurring, the Polk Sheriff will be investigating as outlined in the proactive investigations.
- d. Public Works personnel will complete the maintenance form for structural controls for each incident, and keep the report in the maintenance log.

Part III A.7 c

PLAN AND STANDARD OPERATING PROCEDURES FOR PROACTIVE
ILLCIT DISCHARGE/CONNECTIONS/ DUMPING INSPECTIONS

Part III A.7 c

Plan and Standard Operating Procedures for Proactive Illicit Discharge Connection and Dumping Inspections

The City of Eagle Lake Public Works Department has identified outfalls, retention ponds and catch basins. The City has no industry, but there are residential and commercial areas in the City, together with two elementary schools and one high school. The City has adopted Polk County Ordinance 93-06, which gives the City authority to investigate illicit discharges to our storm water system, and to fine violators. With that as a basis, the procedures for proactive inspections of illicit discharges to the storm water system are as follows:

- a. Each June and December, during the regular outfall inspection and the regular retention pond inspection, and quarterly, during the regular catch basin inspections, the inspection of outfalls, retention ponds and catch basins will be expanded to include looking for evidence of discharges of oil, chemicals or other substances which should not be in outfalls, retention ponds or catch basins.
- b. If foreign materials are found in outfalls, retention ponds or catch basins notation will be made on form for inspecting structural controls and the appropriate agencies (Polk County Fire/Rescue or Polk Natural Resources) will be notified immediately to assess the substance found and advise on steps for clean up. Also, the Polk County Sheriff will be notified as needed to investigate how the substance got there. It is anticipated that the deputies will interview adjacent property owners and watch the property in hope of return of the violators. When caught, the violators will be charged under the Eagle Lake Ordinance which adopted Polk County Ordinance 93-06. If, after testing, the substance is found not to be hazardous, notation is still made on the inspection form, and there is still an investigation to find out who did the dumping. When found, the person will need to disclose what was dumped, and will be advised on proper methods of disposal. The person will also be advised that he or she needs to cooperate to protect our lakes, and if involved in another dumping incident, will be charged

The Public Works Department conducts 254 proactive inspections per year: 224 for the catch basins and 6 for the retention ponds.

There was no evidence found of illegal dumping in the inspections performed in the 2012-13 permit year.

There were no reports received by City personnel during the permit year of illicit connections or illegal dumping or illicit discharges.

STANDARD OPERATING PROCEDURES FOR SPILL PREVENTION AND RESPONSE EFFORTS

Part III A. 7 d

STANDARD OPERATING PROCEDURES FOR SPILL PREVENTION AND RESPONSE EFFORTS\

The City of Eagle Lake Public Works Department has developed procedures for regular inspection of outfalls, catch basins and retention ponds. Additionally, the procedures for proactive and reactive responses to illegal dumping in the City has been detailed.

Prevention: There has been detail presented on the response to a spill or illegal discharge. Some of the City's actions assist in preventing spills and illegal discharges, such as

1. Regular inspections of catch basins, retention ponds, etc. by Public Works personnel.
2. Use of the NEWSLETTER to inform people of proper disposal of toxic and hazardous chemicals
3. Topic of ecology in the Summer Recreation Program and the introduction of proper disposal of chemicals to the children, who carry it home to the parents

PLAN FOR SPILL PREVENTION AND RESPONSE TRAINING

Public Works personnel have previously obtained Florida Storm Water and Sedimentation Control Inspector Certification. Additionally, Public Works personnel have attended training on best management practices for pesticide and fertilizer application from the Cooperative Extension Service. The personnel have also attended training specifically on spills presented by Polk County in the permit year. It is the City's desire to have personnel attend refresher training yearly.

Public Works Personnel did not attend refresher training in this permit year because of other activities such as preparing for the lift station project and the Bingham project.

PLAN FOR PUBLIC EDUCATION AND OUTREACH FOR PROPER USE AND DISPOSAL
OF OIL, TOXIC CHEMICALS AND HOUSEHOLD WASTE

Part III A.7.f

PLAN FOR PUBLIC EDUCATION AND OUTREACH FOR PROPER USE AND DISPOSAL
OF OIL, TOXIC CHEMICALS AN HOUSEHOLD WASTE

The response to Part III A.7.f will largely be a repeat of the response to Part III A.7.e. It is our intention to continue providing the informational pamphlets at the entrance to City Hall about storm water topics, including the proper use and disposal of chemicals, oil and household waste. Specifics are as follows:

- The NEWSLETTER will have periodic articles on how and where to apply fertilizer, and where not to apply fertilizer(near the lakes); proper storage of chemicals, fertilizer and oil; and proper disposal of excess material and the containers.
- The website will continue to have the complaint form, and periodically will include cautions about proper use and disposal of oil, chemicals and household waste
- The summer recreation program will inform the children about the need to keep oil and chemicals out of our lakes, with the hope that the information will be taken back to their parents.

STANDARD OPERATING PROCEDURES TO IDENTIFY SEEPAGE INTO OR OUT OF OUR
SANITARY SEWER SYSTEM

Part III A. 7. g

STANDARD OPERATING PROCEDURES TO IDENTIFY SEEPAGE INTO OR OUT OF
OUR SANITARY SEWER SYSTEM

1. The City of Eagle Lake has 11 sanitary sewage lift stations, with 5 being major lift stations. All lift stations are checked daily to ensure proper operation. In addition, after every rain each lift station will be checked for increased flow.
2. The walls of each wet well will be checked for changes in appearance during wet and dry times of the year. The wet wells should contain all sewage within the wet well, and the walls should not change appearance depending on wet or dry times of the year. Changes in appearance of the walls could indicate cracks leading to seepage of ground water in, or of sewage out of the wet well.
3. Any cracks in wet well walls are to be checked; cause of the cracking to be determined; and the cracks sealed or wet well replaced.

The City has identified one lift station(Crystal Beach Lift Station) as having a deficient wet well in that it appears to leak sewage out during dry times and let in ground water during wet times. The City is in the middle of a lift station renovation project. It was initially bid to replace all 5 major lift stations, but those bids came in 60% higher than estimate. The project was re-bid at a 3 lift station level, with the Crystal Beach lift station being included in the three. We expect the bids in March 2014 to be within budget, with construction summer of 2014.

Part III A.8.a

INDUSTRIAL AND HIGH RISK RUN OFF

Part III A.8.a

STANDARD OPERATING PROCEDURES FOR ASSESSING INDUSTRIAL AND HIGH RISK RUNOFF

The City of Eagle Lake does not have any operating municipal landfills, or any hazardous waste treatment storage, disposal or recovery facilities. The City does have residential areas; three schools; and a small commercial area. In the scheduled semi-annual and quarterly inspections of outfalls, catch basins and retention ponds, notations will be made in the change of use of adjacent land, which may lead to the development of high risk sites. The notation will be made on the inspection form for structural controls, and a copy given to our Building Official for further investigation.

PLAN FOR STORM WATER, EROSION AND SEDIMENTATION CONTROL TRAINING

PART III A.9.c

PLAN FOR EROSION AND SEDIMENTATION CONTROL TRAINING

Both Public Works Director and the Assistant Public Works Director have obtained Florida storm water erosion and sedimentation control inspector certification. The intention is to have both take a refresher course every year either through Polk County of the Extension Service

ORDINANCE O-14-02

AN ORDINANCE OF THE CITY OF EAGLE LAKE, FLORIDA, AMENDING THE CITY OF EAGLE LAKE CODE OF ORDINANCES BY ADOPTING BY REFERENCE POLK COUNTY ORDINANCE NO. 13-005 REGARDING FERTILIZER MANAGEMENT; PROVIDING FOR CODIFICATION; PROVIDING FOR CONFLICTS; PROVIDING FOR SEVERABILITY; AND PROVIDING AN EFFECTIVE DATE.

WHEREAS, pollutants from fertilizer that are present in stormwater runoff have a significant impact on lakes in the City of Eagle Lake; and

WHEREAS, the City Commission of the City of Eagle Lake finds it necessary and desirable to amend the Code of Ordinances of the City of Eagle Lake to regulate fertilizer management practices to protect the quality of the City's water resources; and

WHEREAS, the Polk County Board of County Commissioners adopted Ordinance No. 13-005 on March 19, 2013 pertaining to the fertilizer management practices; and

WHEREAS, the City Commission of the City of Eagle Lake desires to adopt the Polk County Ordinance 13-005 by reference, and for the provisions thereof to be administered by the City of Eagle Lake;

NOW THEREFORE, BE IT ORDAINED by the City Commission of the City of Eagle Lake, Florida, as follows:

1. The City of Eagle Lake adopts by reference Polk County Ordinance 13-005 as set forth in Exhibit "A", attached hereto and made a part hereof.

2. It is the intent of the City Commission that the provisions of this Ordinance shall become codified and made a part of the City of Eagle Lake Code of Ordinances. The sections of this ordinance may be renumbered, reformatted or re-lettered to accomplish such intention.

3. All ordinances in conflict herewith are hereby repealed.

4. Should any section, paragraph, clause, sentence, item, word or provision of this Ordinance be declared invalid by a court of competent jurisdiction, such decision shall not affect the validity of this Ordinance as a whole, or any part hereof, not so declared to be invalid.

5. This Ordinance shall take effect _March 31, 2014.

INTRODUCED on first reading this _3rd___ day of __March , 2014.

PASSED on second reading this 17th_ day of _March, 2014.

CITY OF EAGLE LAKE, FLORIDA

ATTEST

J.R. SULLIVAN, MAYOR

CITY CLERK DAWN BIALY

Approved as to form:

CITY ATTORNEY HEATHER R. CHRISTMAN

STANDARD OPERATING PROCEDURES FOR CONSTRUCTION SITE PLAN REVIEW FOR
STORMWATER, EROSION AND SEDIMENTATION CONTROLS AND ERP AND CGP COVERAGE

PLAN FOR INSPECTION OF CONSTRUCTION SITES

Part III A. 9 a

STANDARD OPERATING PROCEDURES FOR CONSTRUCTION SITE PLAN REVIEW FOR STORM WATER,
EROSION AND SEDIMENTATION CONTROLS and ERP AND CGP COVERAGE

This section is a repeat of Part III A.2, and as such, Part III A. 2 is repeated in the entirety here.

Part III A.9.b

This section is a repeat of what was detailed in Part III A.2 in that inspection activities at construction sites was presented there.

QUESTIONS ON PART VI

Part VI Annual Report Content: The Permittees are specifically required to answer the following questions under Part VI of the Permit

Question 1 - Have Storm water Pollutant Loadings from The Eagle Lake MS4 decreased? Yes

Why?

I am reporting that pollutant loadings from the Eagle Lake MS4 have most probably decreased because of the increased trash collection done by prisoners and Public Works personnel. As reported, instead of the bi-weekly litter collection we are now collecting litter every week, and our material collected has gone from 36 cubic yards per year to 80 cubic yards per year.

Question 2 - Which components of the SWMP are working well and are effective in reducing storm water pollutant loadings? Why are they effective?

The components working well are the consistent inspections of structural controls, whether quarterly or semi annually, and the weekly litter collection program. There are two reasons for effectiveness:

1. Consistency in executing the litter collection and inspection program
2. Actually doing something to affect water quality

By consistently collecting litter we keep the City cleaner than haphazardly performing the activity. Consistently inspecting our City reinforces the idea we are serious about protecting our waters. Word gets around, and polluters know that if they dump in Eagle Lake we will find it, and we will try to catch them. People seeing that the City is actually doing something to enhance water quality will have a positive effect on everyone's actions.

Question 3 – Which components of the SWMP are not working well and need to be revised to make them more effective in reducing storm water pollutant loadings?

In my opinion the component not working well is the educational requirement. Yearly refresher training is not needed because of redundancy. This is especially true in small communities with limited public works staff. Achieving certification is good; a requirement for yearly refresher training is not needed because there is not that much 'new' training out there. Every three years would be more appropriate.

Question 4 - Which components of the SWMP do not contribute to reducing storm water pollutant loads and could be revised or eliminated?

The answer to question 3 is appropriate to question 4. A training requirement is needed, but not for every year. Because of the small staff of the smaller cities, yearly redundant training reduces actual time spent by personnel on storm water problems, which is a problem in a city with a small staff.

Question 5 - Is the monitoring program providing data that can be used to assess the effectiveness of the SWMP in reducing storm water pollutant loadings, assess the effectiveness of specific BMPs and determine how storm water retrofitting projects should be prioritized for implementation?

The answer to question 5 is yes, but there is an easier way to do it. The answer is yes because the City can identify where, and on what streets, we are collecting the most trash. The point about 'an easier way to do it' is something that was apparent in the NPDES program 20 years ago, but has not really taken place as of yet. The knowledge of what should be done to reduce pollution; and where it would be most productive to direct our efforts, is, and has been contained in the mind of every public works director or street superintendent of every city. The person who cleans out the catch basins knows what is needed. If we really wanted to make progress in reducing pollution we should concentrate less on filling out forms, and more on questioning the people in the organization that know, and then develop solutions based on their responses. Less reliance on completing forms and listening to engineers, and more reliance on interviewing workers on the scene, and then, based on comments from people on the scene, let engineers design solutions. Action is needed, not filling out forms as we do now.

In Eagle Lake the City Manager may fill out the form, but that form is completed only after interviewing the Public Works Director and his assistant. Similarly, storm water, sanitary sewer and street projects are only done after the Public Works Director and his assistant are questioned about the need for the project; the perceived effects after the project is completed, and the perceived feasibility of doing the project.