Standard Operating Procedure
Industrial and High Risk Runoff

PART III.A.8.A.

IDENTIFICATION OF PRIORITIES AND PROCEDURES FOR INSPECTIONS
INTRODUCTION

The National Pollutant Discharge Elimination System (NPDES) regulates the discharge of stormwater under the authority of Section 402(p) of the Clean Water Act (CWA). The Department of Environmental Protection (DEP) has the designated authority to administer the NPDES program in Florida. Under this authority, the County is regulated as a Phase I Municipal Separate Storm Sewer System (MS4) under Permit # FLS000004-004. The current permit term is January 1, 2014 through December 31, 2018.

Several co-permittees are also covered under the same permit: Florida Department of Transportation, Town of Longboat Key, and cities of Sarasota, North Port, and Venice.

Phase I permits require permittees to develop and implement a written plan for conducting inspections of high risk facilities to determine compliance with all appropriate aspects of the stormwater program (e.g., no illicit discharges/connections/dumping, compliance with local stormwater regulation requirements, and coverage under the Department's NPDES Multi-Sector Generic Permit for Stormwater Discharge Associated with Industry Activity.) These inspections are part of a comprehensive stormwater management program to reduce the contamination of stormwater runoff and prohibit illicit discharges to the MS4.

Sarasota County Air and Water Quality staff conducts inspections of high-risk and industrial facilities within Sarasota County and the City of Sarasota. Sarasota County performs this function for the City of Sarasota under an Interlocal Agreement.

I. LEGAL AUTHORITY

The legal authority for inspecting industrial facilities is clearly identified in the following:

- The Water Pollution Control Code, Chapter 54, Article VII, of the Sarasota County Code. Specifically the following sections:

  Section 54-185(a)  
  Addresses the inspector's right of inspection.

  Section 54-185(b)  
  Addresses the inspector's authority to collect samples.

  Section 54-185(e)  
  Addresses temporary disconnection of water service for commercial or industrial facilities that contribute to illicit connections.

  Section 54-187(e) and (f)  
  Addresses unauthorized discharges.
Section 54-187(g)(2) Addresses Florida Department of Environmental Protection Generic Permits.

Florida Department of Environmental Protection Generic Permits. The requirements of Chapter 62-621, F.A.C., pertaining to the National Pollutant Discharge Elimination System being herein adopted pursuant to Section 54-181(n) of this Article are noted as follows:

(2) Operators of Sites of Industrial Activity subject to regulation under the Multi-Sector Generic Permit for Stormwater Discharge Associated with Industrial Activity (Multi-Sector Generic Permit, or MSGP) shall:

a. Submit a copy of the Notice of Intent to obtain MSGP coverage, or submit a copy of a No Exposure Certification form to the Administrator prior to the commencement of any regulated activity if a new facility, or within 45 days of notification by the Administrator in accordance with Rule 62-621.300(5)(a), F.A.C.;

b. Submit a copy of the DEP coverage confirmation letter if coverage is required, or a copy of the certified No Exposure Certification form to the Administrator;

b. Submit a copy of the DEP coverage confirmation letter if coverage is required, or a copy of the certified No Exposure Certification form to the Administrator;

c. Draft, certify, and implement the sector-specific Stormwater Pollution Prevention Plan prior to the commencement of any regulated activity;

d. Submit a copy of the certified Stormwater Pollution Prevention Plan to the Administrator prior to the commencement of any regulated activity if a new facility, or within 45 days of notification by the Administrator;

e. Maintain a copy of the Stormwater Pollution Prevention Plan, and copies of the monitoring records at the site where they shall be readily available to the Administrator, DEP or EPA personnel;

f. Submit copies of the Discharge Monitoring Reports to the Administrator on the same frequency as submitted to DEP.

- The Solid Waste and Recyclable Materials Collection Code, Chapter 106, Article I, Section 106-1(a): Prohibiting throwing of trash, etc. No person, firm, company or corporation or association shall discharge, throw, place or allow to remain in or upon any private premises, road, street, alley, canal, ditch, stream, lake, pond or public road, street, alley, canal, ditch, stream, lake, pond, bay or other waters, or any other public property, except sanitary landfills and septage treatment facilities duly designated and established by the Board of County Commissioners of Sarasota County, Florida, any filth, offal, garbage, foul water, dye water, refuse from industries or manufactories, untreated or improperly treated effluent, raw sewerage, human urine, human excrement, decayed animal or vegetable matter, septic tank effluent, any matter extracted from septic tanks, or any other offensive substances.

- The legal authority for enforcement is clearly identified in Code Enforcement Code, Chapter 2, Article VIII, of the Sarasota County Code.

II. IDENTIFICATION OF FACILITIES

To control the mobilization of industrial pollutants (resulting from exposed materials and activities) by stormwater runoff, Florida's NPDES stormwater program regulates "stormwater discharges associated with industrial activity," which includes eleven categories of industrial activity. An operator of a regulated industrial facility that has industrial materials or activities exposed to rainfall or runoff, must obtain a NPDES Multi-Sector Generic Permit or Individual Permit and implement an appropriate Stormwater Pollution Prevention Plan (SWPPP) to reduce contamination of stormwater
runoff. NPDES permits for industrial facilities have been required since October 1, 1992. In certain instances, regulated operators may be eligible for a Conditional No Exposure Exclusion which is an exclusion from the requirement to obtain a permit. No exposure means: all activities and materials are protected by a storm-resistant shelter preventing exposure to precipitation and/or runoff.

Florida's NPDES stormwater program regulates all industrial activities that meet both of the following criteria:
- Have stormwater discharges to surface waters of the State or into a MS4, and
- Are included in any one of the eleven categories of "stormwater discharges associated with industrial activity" identified in 40 CFR 122.26(b)(14) and adopted by reference within Chapter 62-620, Florida Administrative Code.

The eleven categories are as follows:

Category (i)   Facilities subject to federal effluent limitations or new source performance standards
Category (ii)  Heavy manufacturing (e.g., ship building and repair, chemical manufacturing, wood products manufacturing)
Category (iii) Mining/oil and gas exploration
Category (iv)  Hazardous waste facilities
Category (v)   Landfills or open dumps
Category (vi)  Recycling facilities (e.g., salvage yards, auto junk yards, battery reclaimers)
Category (vii) Steam electric power generation facilities
Category (viii) Transportation facilities (e.g., trucking, airports, marinas)
Category (ix)  Treatment works (e.g., domestic wastewater treatment plants)
Category (x)   Large construction activity (i.e., disturbing 5 or more acres of land). This category is regulated and permitted separately under the NPDES Stormwater Program for Construction Activity.
Category (xi)  Light industry (e.g., printing, warehousing)

Air and Water Quality staff have developed and continue to maintain an inventory of industrial activities that discharge stormwater into the MS4. The inventory identifies the outfall and surface waterbody into which each facility discharges. Facilities for inspection can fall into two categories, (1) high risk, or (2) low risk.

Updated September 16, 2014
The current inventory contains the following:

Table 1. Inventory

<table>
<thead>
<tr>
<th></th>
<th>Sarasota County</th>
<th>City of Sarasota</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of high risk facilities</td>
<td>84</td>
<td>23</td>
</tr>
<tr>
<td>Number of low risk facilities</td>
<td>111</td>
<td>32</td>
</tr>
<tr>
<td>Total number of facilities</td>
<td>195</td>
<td>55</td>
</tr>
<tr>
<td>Number of closed facilities</td>
<td>258</td>
<td>86</td>
</tr>
</tbody>
</table>

High risk facilities include:

- Operating municipal landfills;
- Hazardous waste treatment, storage, disposal and recovery facilities;
- Facilities that are subject to Emergency Planning and Community Right-to-Know Act (EPCRA) Title III, Section 313 (also known as the Toxics Release Inventory (TRI) maintained by EPA);
- Abandoned and/or inactive or uncontrolled Superfund sites (CERCLIS);
- Private and municipal waste handling facilities; and
- Any other industrial or commercial discharge that the county determines is contributing or could potentially contribute a substantial pollutant loading to the MS4. This could include facilities identified through the proactive inspection program as per Part III.A.7.c of the permit.

Low risk facilities include:

- Facilities with a regulated SIC code, but no exposure to limited exposure to stormwater at the site, and may qualify for a DEP Conditional No Exposure Exclusion; and
- Any other industrial or commercial facility with the potential to discharge pollutants to the stormwater system.

III. MAINTENANCE OF INVENTORY

Annual updates are made through information/referrals from other departments or agencies, the review of the Sarasota County Tax Collector Business Tax records, and data collected during the year regarding new businesses, businesses that have closed, or businesses that have relocated. The DEP database of all facilities that have an active NPDES stormwater permit (CGP, MSGP, or NEX) is also reviewed from the following location:

http://www.dep.state.fl.us/water/wastewater/facinfo.htm.

IV. PRIORITIZING LIST

The inventory of facilities is ranked based on:

- The type of industrial activity based on SIC codes;
- The use and management of chemicals and raw materials at a facility and the likelihood that pollutants may discharge into the stormwater system from the site; and
- The size and location of the facility with respect to its discharge point to a waterbody.

Facilities to be inspected are found in the Active Facilities Database and are inspected according to last inspection date. Approximately 100 High Risk Facilities are inspected annually. Most Low Risk Facilities and Non-Regulated Facilities are inspected approximately every five years, although some may be inspected more often as a result of their potential for
discharges. Several businesses were determined to be home businesses and are not inspected as part of this program.

V. GUIDANCE MANUALS AND TRAINING RESOURCES

Staff uses the following guidance manuals and training resources to aid in the inspections of industrial facilities:

- Sarasota County. *Illicit Discharge Detection and Elimination (IDDE)*. Internal staff training PowerPoint presentation. Sarasota, Florida.

VI. RESOURCES

The following resources are available to staff:

<table>
<thead>
<tr>
<th>Truck</th>
<th>Digital camera</th>
<th>Cell phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Laptop with air card</td>
<td>Clipboard, pens, waterproof pens</td>
<td>Maps, GIS aerials</td>
</tr>
<tr>
<td>Field notebook, field data sheets</td>
<td>Latex gloves</td>
<td>Protective eyeglasses or goggles</td>
</tr>
<tr>
<td>Rubber boots</td>
<td>Cooler and ice</td>
<td>Sample bottles</td>
</tr>
<tr>
<td>Shovel</td>
<td>Manhole hook</td>
<td>Traffic cones</td>
</tr>
<tr>
<td>Safety vest</td>
<td>Identification Badge</td>
<td>Hand sanitizer</td>
</tr>
<tr>
<td>Field meters for temperature, dissolved oxygen, conductivity, salinity, turbidity, and chlorine.</td>
<td>De-ionized water for rinsing</td>
<td>Extra batteries for meters</td>
</tr>
<tr>
<td>pH paper</td>
<td>Paper towels</td>
<td>Sampling pole</td>
</tr>
<tr>
<td>First aid kit</td>
<td>Fire extinguisher</td>
<td></td>
</tr>
</tbody>
</table>

VII. SAFETY MEASURES

The following safety measures shall be adhered to by all staff:

- Maintain first aid kit;
- Maintain fire extinguisher,
• Observe traffic patterns and pedestrian traffic;
• Observe weather patterns and lightning warnings;
• Observe County policy of no smoking in County vehicles;
• Observe County policy of no cell phone use while driving a County vehicle;
• Wear latex gloves while sampling;
• Have awareness of wet, slippery, steep, or unstable conditions;
• Have awareness of Material Safety Data Sheets for all reagents and chemicals;
• Report any injuries and property damage; and
• Do not enter confined spaces.

VIII. PRE-INSPECTION

To assist with preparing for and conducting field inspections, staff should conduct the following for:

Existing Facilities:

• Review existing file of past inspection records;
• Review current property ownership and land use,
• Review business ownership and check records in sunbiz;
• Review permit information such as permit type and expiration date (Existing facilities without stormwater permit coverage may be in violation of state regulations.); and
• Review any history of noncompliance and any citizen concerns.

New Facilities:

• Determine if facility is newly formed, new to the area, or relocated from another location within the County;
• Research company to gain as much information as possible regarding what raw materials are used and manufacturing products are produced;
• Review current and past aerials of facility site;
• Determine if facility is required to obtain a permit;
• Determine SIC code;
• Review historical files for potential pollution issues;
• Determine drainage, identify any outfalls or structural controls, and location of where stormwater enters the MS4; and
• Determine business operating hours to plan for inspection.

Before leaving the office, the inspector shall conduct the following:

• Gather supporting documentation such as field checklists, chain-of-custody forms, maps, property information, etc.;
• Clean and calibrate any field meters; and
• Obtain a variety of sample bottles and cooler.

IX. INSPECTION GUIDELINES

All staff shall carry photo identification to show facility owners, owner’s representatives and tenants, if requested.

All staff shall act in a professional manner at all times while conducting field activities and in dealing with the public.
All staff shall obtain the permission of the property owner, business owner or manager, tenant or employee to enter the property for inspection.

All staff shall wear proper safety protection and abide by the facility’s safety policies.

If the property/business owner will not give permission to enter the property, staff shall promptly leave without an argument.

Staff shall not enter property with a “No Trespassing” sign.

Staff shall not enter property when the surroundings make them feel uncomfortable or compromise their safety.

In accordance with Section 54-185(a)(6), of the Sarasota County Code, at times other than specified in the code, and at facilities and other properties that do not require permits and are not otherwise closely regulated, inspection can be made by consent or by means otherwise available by law. If consent to inspect is denied or the Inspector can justify the failure to seek consent, Inspectors may obtain an inspection warrant pursuant to Florida Statutes.

In accordance with Section 54-185(a)(7), of the Sarasota County Code, if statutory grounds exist, or if there is probable cause to suspect a criminal violation, Inspectors may contact the appropriate law enforcement personnel to obtain a search warrant and may aid the officer, if required, pursuant to Florida Statutes.

X. ON-SITE INSPECTION PROCEDURE

Staff conducts unannounced visits to industrial facilities. A copy of the Industrial Facility Inspection Form that is completed during the inspection is included in Attachment 1. The facility’s NPDES file and any relevant information is gathered and taken on the inspection.

When staff arrives onsite, it is imperative that the manager, supervisor, or owner is located. The County ID is displayed and the reason for the visit is explained. A site survey and physical walkthrough of the facility is conducted. Staff must inspect the following areas:

- Around all equipment exposed to precipitation;
- Where spills and leaks have occurred in the past;
- Material storage areas;
- Outdoor material processing areas;
- Material handling areas;
- Loading and unloading areas; and
- Waste generation, storage, treatment and disposal areas.

During the inspection, staff should identify:

- Potential pollutant sources;
- Non-stormwater discharges;
- Illicit connections;
- Dry weather flow;
- Stormwater flow direction;
- Outfall(s) to MS4;
• Structural and non-structural stormwater controls;
• Spill response procedures and equipment; and
• Onsite waste disposal practices.

Potential pollutant sources may consist of:

• Fueling stations;
• Vehicle and equipment maintenance;
• Vehicle and equipment wash and rinse areas;
• Loading/unloading areas;
• Treatment, storage of waste disposal areas;
• Liquid storage tanks;
• Processing areas;
• Outside storage of raw materials, by products, or finished products;
• Open containers;
• Past spills and leaks; and
• Onsite waste disposal practices.

After the walkthrough, staff should request to review the facility’s DEP issued Multi-Sector Generic Permit for Stormwater Discharge Associated with Industrial Activity (MSGP) or Individual Permit and Stormwater Pollution Prevention Plan (SWPPP).

If a facility has a regulated SIC code, but has no materials exposed to stormwater, the facility may qualify for a DEP Conditional No Exposure Exclusion. No exposure means that all activities and materials are protected by a storm-resistant shelter or exposure to precipitation and/or runoff is prevented.

If a facility is determined to need a permit, but has not applied, staff should guide the facility’s representative through the process. If the permit is not applied for in a reasonable amount of time, the name, address, SIC, and contact information shall be supplied to DEP on a yearly basis.

The SWPPP is a comprehensive stand-alone document tailored to the facility’s specific operation(s). A copy of the SWPPP must remain on site at all times and should be available on request during inspections. If the SWPPP is not available during the inspection, it is noted on the Inspection Form. The SWPPP requires the selection and implementation of Best Management Practices (BMPs) to prevent and reduce the pollution of the stormwater runoff discharging from the site. The SWPPP must be reviewed by the facility at least annually to ensure that it reflects the current conditions at the site.

The SWPPP must include:

• Pollution Prevention Team;
• Description of potential pollutant sources;
• Drainage;
• Inventory of exposed materials;
• Significant spills and leaks;
• Non-stormwater discharges;
• Sampling data;
• Summary of potential pollutant sources;
• Measures and controls;
• Good housekeeping;
• Preventative maintenance;
• Spill prevention and response;
• Inspections;
• Employee training at a minimum of once per year;
• Recordkeeping;
• Sediment and erosion control;
• Management of runoff; and
• Comprehensive site evaluation.

The SWPPP may be reviewed for the following:

• Completion of a site specific SWPPP;
• Available onsite for review;
• Amended as needed and up-to-date;
• Results of analytical monitoring, if required;
• Results of quarterly visual monitoring to include discharge points, any BMPs in place and areas of exposed materials that have the potential to come into contact with stormwater;
• Results of compliance monitoring, if required; and
• Results of annual comprehensive site evaluation.

The Multi-Sector Generic Permit contains three different types of monitoring provisions depending on the type of industrial activity. These types of monitoring are referred to as visual examination, analytical monitoring, and compliance monitoring. Almost all facilities covered by the MSGP are required to perform visual examinations of their stormwater discharges on a quarterly basis. The results should be documented in the SWPPP and kept onsite. Visual examination is an inexpensive means of obtaining a rough assessment of the stormwater quality. The results are meant be used by the facility to identify pollution problems and to verify that the implemented BMPs are effectively preventing or reducing stormwater pollution.

A number of facilities are required by the MSGP to perform analytical monitoring of stormwater samples collected from the outfalls/discharge points. Analytical monitoring is required only for those industrial sectors or subsectors that the EPA determined have a high potential to discharge a pollutant(s) at concentration(s) of concern. Analytical monitoring is designed to provide feedback for a facility operator to assess the effectiveness of the pollution prevention plan and the need for any improvements to the plan. Analytical monitoring is typically required to be performed by the facility on a quarterly basis during years two and four of the permit. The results of the quarterly grab samples collected in the second year of permit coverage are averaged and compared to the benchmark value(s) for the pollutant(s). A benchmark pollutant concentration is a level above which a stormwater discharge could adversely affect receiving water quality.

Compliance monitoring is required when a facility is subject to one of the Federal effluent limitation guidelines addressing limits on stormwater runoff. Sampling is required to determine compliance with those limits.

XI. ALLOWABLE NON-STORMWATER DISCHARGES

Current municipal NPDES permits require municipalities to effectively prohibit non-stormwater discharges unless authorized by a separate NPDES permit or allowed in accordance with the current NPDES permit conditions. The current permit allows certain non-stormwater discharges in the
stormwater system as long as the discharges are not significant sources of pollutants. The following non-stormwater discharges to the MS4 are allowed:

- Water line flushing;
- Landscape irrigation;
- Diverted stream flows;
- Rising ground waters;
- Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)) to separate storm sewers;
- Uncontaminated pumped ground water;
- Discharges from potable water sources;
- Foundation drains;
- Air conditioning condensate;
- Irrigation water;
- Springs;
- Water from crawl space pumps;
- Footing drains;
- Lawn watering;
- Individual residential car washing;
- Flows from riparian habitats and wetlands;
- Dechlorinated swimming pool discharges;
- Street wash waters;
- Discharges or flows from emergency fire fighting activities;
- Reclaimed water line flushing authorized pursuant to a permit issued under the authority of Rule 62-610, F.A.C.; and
- Flows from uncontaminated roof drains.

**XII. INDICATORS OF ILLICIT/UNAUTHORIZED DISCHARGES**

The following are potential indicators of an illicit/unauthorized discharge:

- Foam—possible upstream vehicle washing activities, chemical discharge or sea foam;
- Oil sheen—possible leak or spill (some sheens are common and occur naturally);
- Cloudiness—possible indicator of suspended solids such as dust, ash, powdered chemicals and ground up materials;
- Excessive sediment—possible turbid water from lack of erosion control measures, or concrete and stone cutting operations;
- Sanitary waste—spills, overflows, cross-connection, septic tank discharges;
- Color-fluorescent dyes added to laundry and dishwasher detergent, paint, or algae blooms;
- Odor—sewage, rancid/sour, petroleum/gas, sulfide, chlorine, or decomposition;
- Orange staining—indicator of mineral concentrations such as iron deposits;
- Floatables—sewage, suds, algae, dead fish, and oil and grease sheens (does not include trash or litter);
- Physical indicators—outfall damage, deposits or stains, abnormal or discolored vegetation;
- Dry weather flow—observed flows are considered non-stormwater related, the flow may or may not be an illicit discharge and may be groundwater; and
- Debris—trash, litter, leaves, grass clippings.

Updated September 16, 2014
XIII. DOCUMENTATION

To document the inspection findings, staff completes the Industrial Facility Inspection Form. Photographs are often taken to support the observations. A hand-drawn sketch of the site is also useful.

All documentation and field notes are subject to Public Records Requests and should only reflect professional observations and comments.

Taking photographs shall be conducted as follows:

- Take at least one photograph of the site to document the reason for the inspection.
- Photographs can be taken from the street or right-of-way, if the violation is in full view of the inspector.
- Photographs can be taken through a chain link fence.
- Photographs cannot be taken over a privacy fence.
- Photographs shall be properly labeled following the guidelines below. Label should list the facility name, the address, grid number, location of the issue, inspection type, time and date. The label should also list the type of camera and recording media, and if the photos were altered. There also should be a concise description of what the photo is of and the direction it was taken.
- Photographs shall be signed by the photographer.

Example Photograph Log Documentation:

<table>
<thead>
<tr>
<th>Incident #:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grid #: G</td>
</tr>
<tr>
<td>Facility/Location Name:</td>
</tr>
<tr>
<td>Address:</td>
</tr>
<tr>
<td>Inspection Date:</td>
</tr>
<tr>
<td>Inspection Time:</td>
</tr>
<tr>
<td>Inspection Type:</td>
</tr>
<tr>
<td>Type of Camera Used: ex. (Nikon Coolpix S6500)</td>
</tr>
<tr>
<td>Digital Recording Media:</td>
</tr>
<tr>
<td>Were the photos altered? Yes or No</td>
</tr>
<tr>
<td>Description:</td>
</tr>
<tr>
<td>Photographer:</td>
</tr>
</tbody>
</table>
| Signature of Photographer:_____________

All inspection findings are entered into the NPDES database and when the Inspection Report is complete, all documentation is filed by Grid Number and placed in the NPDES Industrial Files.

XIV. FIELD TESTING AND SAMPLING

To perform field calibrations and testing, staff follows DEP Standard Operating Procedures for Field Quality Control Requirements DEP-SOP-001/01, FQ 1000 and follows the DEP Standard Operating Procedures for General Field Testing and Measurement DEP-SOP-001/01, FT 1000. Primary calibration is conducted by the County Quality Assurance Officer or sent to a certified
laboratory.

To collect water quality samples, staff follows the DEP Standard Operating Procedures for General Sampling DEP-SOP-001/01 FS 1000.

Staff collects samples, completes Chain-of-Custody form and contacts the County Quality Assurance Officer to arrange for instructions on dropping off samples for transport. Staff shall be aware of the sample holding times. A copy of the Chain-of-Custody form should be kept with the Industrial Facility Inspection Form until the hard copy is returned with the test results. Samples are transported by a courier to a NELAC certified laboratory.

XV. POST-INSPECTION/CLOSING MEETING

Upon completion of the inspection, staff will discuss any deficiencies and/or areas of concern with the property owner, facility representative(s), or site staff. This opportunity will allow time for any questions or clarification and for explaining any next steps. Contact is made with additional parties regarding inspection findings, if necessary.

Prior to leaving the site, staff conducts the following:

- Makes any final notes and sketches;
- Gathers supporting documentation such as maps, property information, etc.;
- Records detailed information and documentation of the investigation; and
- Explains findings or results of inspection to all parties.

If the inspection was required as a result of a citizen concern, staff also conducts the following;

- Determines if concern is valid, unfounded, or there is another explanation for the concern;
- Determines the source of the discharge, contamination, or environmental concern; and
- Explains findings or results of inspection to citizen.

XVI. FOLLOW-UP INSPECTIONS

If there are significant deficiencies, a follow-up inspection shall be conducted within a maximum of 30 days of the original site inspection. This is especially needed if a Notice of Violation was issued. Staff shall document any deficiencies that have been corrected, remaining deficiencies, and any new problems that may be observed.

XVII. VOLUNTARY COMPLIANCE

All attempts should be made to achieve compliance by education and voluntary compliance. In many cases the party responsible for the illicit discharge or illegal connection may not be aware of the existence or the environmental consequence. It is important to educate the responsible party on the impacts of their actions, the stormwater requirements, and the Best Management Practices (BMPs). If an illicit discharge is observed during an inspection, staff conducts the following activities:

- Contacts the responsible party to discuss methods of eliminating the non-stormwater discharge, including disposal options, recycling, and possible discharge to the sanitary sewer.
- Provides information regarding BMPs to the responsible party, where appropriate.
- Continues inspection and follow-up activities until the illicit discharge activity has ceased.

Updated September 16, 2014
• If a violation is documented, staff opens an AMANDA Back Office Suite folder; and
• Creates a record in the Industrial Facility Database.

XVIII. ENFORCEMENT

Depending on the level of infraction and environmental damage, staff has a variety of measures to use such as a verbal warning, Written Warning, Field Violation Notice, Noncompliance Letter, Notice of Violation, or Stop Work Order notifying the property owner or responsible party of the compliance issue and corrective actions.

• If the issue is voluntarily resolved, the case is closed.
• If the issue is not voluntarily resolved, staff, which are also designated Code Enforcement Officers, attempt to resolve noncompliance issues through education, direction, and cooperation.
• If enforcement is warranted, the Water Quality Enforcement and Guidelines Standard Operating Procedure is followed.
• If the issue is not resolved, the formal code enforcement procedure may be initiated through the Special Magistrate process as outlined in Chapter 2, Article VIII of the Sarasota County of Ordinances.

XIX. FINAL DOCUMENTATION

Staff provides a thorough, written chronology of the inspection to include date, time, persons contacted, phone numbers, conversations, photographs, any other supporting documents, inspection results and findings. The inspector is responsible for:

• Organizing inspection findings including field notes, photographs, and any supporting documentation;
• Completing inspection form;
• Creating photo log;
• Entering the data into the databases; and
• Scanning in all supporting documents.

When the inspection has been completed the Industrial Facility Inspection Form and all supporting documentation are filed by the inspector by Grid Number and facility name.

XX. TRAINING

Staff conducting reactive inspections should have a good working knowledge of the following regulations: DEP Chapters 62-4, 62-25, 62-301, 62-302, 62-620, 62-621, 62-62; 40 CFR 122.26; and the Sarasota County Water Pollution Control, Fertilizer and Landscape Management Code, and Code Enforcement Codes.

Staff should also complete a combination of the following:

• 40 hour OSHA Hazwoper,
• 8 hour Hazwoper refresher,
• Florida Stormwater Association Stormwater Operator Certification Levels I and II;
• Internal Illicit Discharge Detection and Elimination staff training; and
• Annual refresher training.

Updated September 16, 2014
XXI. PROGRAM EFFECTIVENESS

The effectiveness of the industrial facility inspection program is evaluated as follows:

- Number of inspections conducted per year;
- Number of referrals from other agencies; and
- Number of trained inspectors.

Attachment:

1. Industrial Facility Inspection Form
Attachment 1
### FACILITY INSPECTION

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>911 Grid #</th>
<th>New Facility? □</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>GPS Accuracy (ft.)</td>
<td></td>
</tr>
<tr>
<td>City</td>
<td>Unincorporated Sarasota County</td>
<td>Facility Latitude</td>
</tr>
<tr>
<td>Contact/Title</td>
<td>Facility Longitude</td>
<td></td>
</tr>
<tr>
<td>Phone</td>
<td>SIC Code #</td>
<td></td>
</tr>
<tr>
<td>Property Owner</td>
<td>NPDES Regulated</td>
<td>Yes or No</td>
</tr>
<tr>
<td>Parcel ID(s)</td>
<td>Activity Sector</td>
<td></td>
</tr>
<tr>
<td>Zoning Code</td>
<td>Permit/Cert. #</td>
<td></td>
</tr>
<tr>
<td>Basin</td>
<td>Left Paperwork</td>
<td></td>
</tr>
<tr>
<td>Inspector</td>
<td>SWPPP on site</td>
<td>Yes or No</td>
</tr>
<tr>
<td>Date/Time</td>
<td>Follow-Up Needed</td>
<td>Yes or No</td>
</tr>
</tbody>
</table>

### DESCRIBE ACTIVITIES:

<table>
<thead>
<tr>
<th>GPS Accuracy (ft.)</th>
<th>Outfall Latitude</th>
<th>Outfall Longitude</th>
<th>Outfall Latitude</th>
<th>Outfall Longitude</th>
</tr>
</thead>
</table>

### SPECIFY PROBLEMS

<table>
<thead>
<tr>
<th>Yes No NA</th>
<th>SPECIFY PROBLEMS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility in an industrial park or other tenant/lease situation.</td>
<td></td>
</tr>
<tr>
<td>Facility on a septic system.</td>
<td></td>
</tr>
<tr>
<td>Evidence of contaminated runoff (from equipment or vehicle maintenance areas, loading docks, storage areas, trash containers or bare ground etc.)</td>
<td></td>
</tr>
<tr>
<td>Open ditches, swales, ponds, or exposed stormwater system components present on or adjacent to facility.</td>
<td></td>
</tr>
<tr>
<td>Water present in stormwater system without an obvious source.</td>
<td></td>
</tr>
<tr>
<td>Oil sheen, foam, scum, or floatables other than from aquatic plants; unusual odor; exceptionally turbid, or unusually colored water present.</td>
<td></td>
</tr>
<tr>
<td>Pipes draining into the stormwater system without an obvious source.</td>
<td></td>
</tr>
<tr>
<td>Open stormwater system is poorly maintained and has accumulations of trash, vegetation, damaged structures, or significant erosion.</td>
<td></td>
</tr>
<tr>
<td>Drop inlets, culverts, manholes, or enclosed stormwater system components present in or adjacent to the facility.</td>
<td></td>
</tr>
<tr>
<td>Poor material handling and storage practices and/or evidence of spills.</td>
<td></td>
</tr>
<tr>
<td>Floor drains present in the operating or process areas of the facility.</td>
<td></td>
</tr>
<tr>
<td>Direct connection from operating/process equipment and/or discharge of process wastewater into floor drains.</td>
<td></td>
</tr>
<tr>
<td>Utility sink(s) draining to floor drains, septic, ground, or stormwater system.</td>
<td></td>
</tr>
<tr>
<td>Presence of underground storage tanks on property.</td>
<td></td>
</tr>
<tr>
<td>Poor waste disposal practices.</td>
<td></td>
</tr>
</tbody>
</table>
Took pictures of problem areas.

<table>
<thead>
<tr>
<th>Potential Problems and General Notes</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Using, storing or cleaning of industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to stormwater.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Materials or residuals on the ground or in stormwater inlets from spills/leaks.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Materials or products from past industrial activity.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Material handling equipment (except adequately maintained vehicles).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Materials or products during loading, unloading or transporting activities.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to stormwater does not result in the discharge of pollutants).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Materials or products handled or stored on roads or railways owned or maintained by the discharger.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Waste material (except waste in covered, non-leaking containers [e.g., dumpsters]).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Application or disposal of process wastewater (unless otherwise permitted).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater outflow.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>