

NPDES

Annual Report Committee Meeting Agenda

February 12, 1998

- **Purpose of Meeting Regularly**
In accordance with page 45 of the Permit, the Annual report is to be coordinated
- **Annual Report required 6 months after the first permit year.**
Goal: To have the Annual report ready to send by the end of February 1999. NOTE: Each permittee is responsible for their section of the annual report.
- **To be submitted as a complete document (under one cover)**
EPA has stipulated the report is to be in "one piece".
- **Review Draft Annual Report Schedule.**
Attached schedule is open for discussion. The Feb 1 complete date is for various boards to meet and approve. Cover letters required (certification, Part V.D, page 54).
- **All co-permittees required to provide summary of activities.**
The requirements of the annual report are outlined in the permit, pages 45 through 53. It is very specific as to how the report is to be sectioned and the contents of each section.
- **Importance of tracking permit related activities.**
During the year, it is very important to document activities to be reported. The permit is a documentation of activities performed, results achieved and comments on any changes to be implemented.
- **StormTrac program to track activities.**
Lee County and some cities are going to use the Stormtrac system to the reportable information and assist in assembling the annual report.
- **Reminders:**
Make sure you have sent your amended Certification Statements.
- **Interlocal Activities, Agreements, etc....**
There are activities such as education, maintenance, illicit connection enforcement coordination and inspections which should be documented by interlocal agreement (or specifically outlined in the permit).
- **Questions?**
Wet weather sampling and dry weather screening? These sites are outlined in Part I and Part II of the Application or in the permit.
- **Next Meeting, March 12**

Draft (*for Discussion Purposes Only*)

Schedule for Annual Report

Monthly Meetings to discuss progress, data entry, coordination of activities, etc. Lee County will assemble and coordinate the annual report. However, each co-permittee is responsible for their section of the annual report.

Listed below are the significant event dates for the assembly and distribution of the report.

October 30 First Draft, assemble data and draft summaries

December 15 Second Draft, discuss summaries and submit for insertion.

February 1 Final Draft, main summary completed, document ready.

Note: During the month of February, approval from governing bodies/authorized signatories.

February 28 Assemble final document with signatures and **mail to EPA**.

**MEMORANDUM
FROM
DEPARTMENT OF PUBLIC WORKS
ENVIRONMENTAL SERVICES DIVISION**

Date: February 13, 1998

TO: Lee County Co-permittees

From: Tony Pellicer
NPDES Coordinator

SUBJECT: February Monthly Coordination Meeting

Attached are copies of the February coordination meeting agenda and annual report schedule for the NPDES stormwater permit.

The meeting was held in accordance with the requirements of the permit. Its purpose was to discuss and coordinate activities for the annual report. An annual report is required for the permit.

The co-permittee annual report submittal is a complete annual report in itself. All of the co-permittee annual reports are to be coordinated and submitted under one cover (the Annual Report). The specific requirements for an annual report are outlined in the permit on pages 45 through 53. Each co-permittee will be designated a position in the appendix (of the Annual Report). Failure to submit an annual report will result in a blank section (of the Annual Report) for the co-permittee.

Lee County is assuming the responsibility of coordinating and assembling the Annual Report. However, no attempt to edit or amend a submittal will be made.

Copies of the agenda with summary notes on each section are to be forwarded to each co-permittee. If you have questions relating to the permit, responsibilities, agreements or associated activities, please give me a call. If I cannot answer your question, we can find an answer.

Attachments (2 ea.)

NPDES

Annual Report Committee Meeting Agenda

April 9, 1998

- **Purpose of Meeting Regularly**

In accordance with page 45 of the Permit, the Annual report is to be coordinated

- **Annual Report**

Event and task tracking are important. Provide comments and documentation for use in the Annual Report. Questions?

- **All co-permittees required to provide summary of activities.**

It is important to document what you do, why it works or why it does not work. Dry weather screening is an example of what may be listed as a problem. This year the dry periods have been markedly reduced. EPA will entertain modifications to activities. Do not get into a bind. Contact Caroline Ejimofor if you have questions concerning the Permit; request EPA acceptance of modifications prior to the Annual Report, the enforcement section will follow the guidance of the permit and agreements, approved modifications or attachments thereto.

- **Importance of tracking permit related activities.**

During the year, it is very important to document activities to be reported. The difficulties encountered and modifications made to the approved methods are VERY important to document. Failure to properly document modifications will result in EPA enforcement. "No money" is not an excuse. Taxing entities have the opportunity to obtain funding through taxes or other revenue generating methods.

- **StormTrac program to track activities.**

If you are participating in the program, Pat is customizing the software for each participant.

- **Reminders:**

Verify Permit information relating to structures, maintenance activities or public education activities. It is a good idea to look at your responsibilities listed in the Permit and verify they are being addressed. Rock Aboujaoude' has graciously provided copies of USEPA tapes related to stormwater, water quality standards and NPDES. They appear to be good public information tapes. Suggestion by Andy Tilton to use APWA as a resource for training and getting information to the professional community.

- **Interlocal Activities, Agreements, etc....**

There are activities such as education, maintenance, illicit connection enforcement coordination and inspections which should be documented by interlocal agreement (or specifically outlined in the permit).

City of Fort Myers- agreements (interlocal), using County forms and related items.

City of Cape Coral- questions about StormTrac

City of Sanibel- None

Town of Fort Myers Beach- Absent

Gateway Services- Contractors and Engineers are getting the word...so far so good.

East county Water Control- Questions about supporting documentation for Boards or Councils for action approval. Suggested contact Tony to clarify specific activities which may be covered by Lee County (such as part of the educational).

San Carlos Estates- None

- **Other Items of Interest**

A 15-minute EPA video entitled "Water Quality Based Approach to Pollution Control" was shown. Discussion centered around its potential as a public awareness item in public access television and the points raised in the video about approaches to water quality. The water quality approach leads to Total Maximum Daily Loads (TMDLs) for each water body and ultimately to Pollutant Load reduction Goals (PLRGs). This is where the NPDES Permit will go for the MS4. It is very important to begin compliance early in the permit. Otherwise, catching up later will be a strain on the budget and other resources.

- **Next Meeting: May 14 @ 1:30 PM, Public Works Building. Only a Notice of Cancellation will be sent.**

NPDES

Annual Report Committee Meeting Agenda

May 14, 1998

- **Annual Report**

Event and task tracking are important. Make sure you review the Permit for tasks to be completed. Begin tabulating tasks, such as structure inspections, structure maintenance and illicit discharges found and remedies taken. It is important to document your comments for use in the Annual Report. If tasks cannot be completed, be sure to justify the reasons for not completing specific tasks. (see "Other Items of Interest" section)

- **All co-permittees required to provide summary of activities.**

*It is important to document what you do, why it works or why it does not work. Dry weather screening is an example of what may be listed as a problem. EPA will entertain modifications to activities. **Do not get into a bind.** It is important to get approvals from EPA to modify permitted activities, before they become a violation.*

Contact Caroline Ejimofor if you have questions concerning the Permit; request EPA acceptance of any modifications prior to the Annual Report, the enforcement section will follow the guidance of the permit and agreements, approved modifications or attachments thereto. "It is better to obtain approval in advance than to suffer the consequences after the fact.

- **Importance of tracking permit related activities.**

During the year, it is very important to document activities to be reported. The difficulties encountered and modifications made to the approved methods are VERY important to document. Failure to properly document modifications will result in EPA enforcement. "No money" is no excuse! Taxing entities have the opportunity to obtain funding through taxes or other revenue generating methods. Be sure to have a plan of action and stick with it.

- **StormTrac program to track activities.**

If you are participating in the program, Pat is beginning to install the software at participating sites, on May 15, 1998.

- **Reminders:**

Verify Permit information relating to structures, maintenance activities or public education activities. It is a good idea to look at your responsibilities listed in the Permit and verify they are being addressed. Suggestion by Andy Tilton to use APWA as a resource for training and getting information to the professional community. You might want to speak to someone in your organization that may be a member to solicit their support.

- **Interlocal Activities, Agreements, etc....**

There are activities such as education, maintenance, illicit connection enforcement coordination and inspections which should be documented by interlocal agreement (or specifically outlined in the permit). The County Attorney's office has been contacted, but no time frame obtained.

- **Reports, comments and or suggestions:**

City of Fort Myers- agreements (interlocal), estimates 25% of Lee County printed materials usage, as an estimate.

City of Cape Coral- Public Education information being distributed with the canal manuals will probably not need to heavily link with Lee County educational printed materials.

City of Sanibel- None

Town of Fort Myers Beach- None

Gateway Services- Use of inspection forms, date and sign.

East county Water Control- None.

San Carlos Estates- None

FDOT- Good Comments on training possibilities. FDOT is performing their own educational program.

- **Other Items of Interest**

Dan DeWiest and Eric Livingston from the FDEP have produced a "Florida Stormwater, Erosion, and Sediment Control Training and Certification Program". Training and certification sessions are to begin in the spring of 98. I have a call in to Dan DeWiest, more info to follow.

There is a Stormwater Certification Program through the FWPCOA at their Annual Short School...More info to follow...Note: We are not sure how (or if) this ties in with the FDEP promoted certification in the paragraph above. However, when we get the information it will be passed along at the following monthly co-ordination meeting.

A question regarding the **Annual Report** submittal was raised (separate or together)...The **Annual Report** is to be submitted under one cover. If co-permittees do not have their information assembled and submitted by the date of mailing, there will be a one line note in their section which will state: "**No Information was available at the time of mailing. Information will follow under a separate cover.**" Please encourage all concerned to get the information you need in to you on time and in a format you can use to generate the **Annual Report**. Look at the Permit, it spells out the parts you need to complete and the information required for each part. If you have questions, now is the time to ask. When the Annual report is being assembled, no one will have time to assess your needs.

- **Next Meeting: June 11 @ 1:30 PM, Public Works Building. Only a Notice of Cancellation will be sent.**

NPDES

Annual Report Committee Meeting Agenda

June 11, 1998

- **Annual Report**

Event and task tracking are important. *If you do not have an event log, start one. Document your activities such as structure maintenance, information or training, etc. These all need to be incorporated in the Annual Report.*

The **Annual Report** is to be submitted under one cover. If co-permittees do not have their information assembled and submitted by the date of mailing, there will be a one line note in place of their section which will state: **“No Information was available at the time of mailing. Information will follow under a separate cover.”** EPA will undoubtedly contact any co-permittee failing to submit an incomplete Annual Report.

- **All co-permittees required to provide summary of activities.**

As a co-permittee there are activities you have direct responsibility to complete and report in the Annual Report. Be sure you are compiling the required information and have in report format (organized in accordance with the outline in the Permit). Make sure you document contacts, agreements, public assistance or public information efforts are written into the report. These can be overlooked, however they are very important and should be reported.

Contact Caroline Ejimofor if you have questions concerning the Permit; request EPA acceptance of any modifications prior to the Annual Report, the enforcement section will follow the guidance of the permit and agreements, approved modifications or attachments thereto. “It is better to obtain approval in advance than to suffer the consequences after the fact.”

- **Importance of tracking permit related activities.**

“No money” is no excuse! During the year, it is very important to document activities to be reported. The difficulties encountered and modifications made to the approved methods are VERY important to document. Failure to properly document modifications will result in EPA enforcement. Taxing entities have the opportunity to obtain funding through taxes or other revenue generating methods. Remind your governing body of the consequences of inactivity. Be sure to have a plan of action and stick with it.

- **StormTrac program to track activities.**

Pat Collins has installed some of the software and should start training soon. He will be here this Friday to install additional workstations.

- **Reminders:**

If you have not started recording your NPDES Permit field activities, it is time to start. There should be Interlocal agreements in place. If you do not have one or more related to NPDES, you might call Audrey Vance at the Lee County Attorney’s Office (335-2236).

- **Interlocal Activities, Agreements, etc....**

There are activities such as education, maintenance, illicit connection enforcement coordination and inspections which should be documented by interlocal agreement (or specifically outlined in the permit). I spoke with the County Attorney's office, but was not able to get a time frame. If you have questions related to the Interlocal, contact Audrey Vance @335-2236.

The Lee County Ordinance related to NPES enforcement has passed through the first Public hearing and the second hearing will be on June 23 @ 5:05 PM.

- **Reports, comments and or suggestions:**

***City of Fort Myers-** Suggested a copy of the passed Ordinance be made available. This will be distributed at the next Monthly meeting on July 9.*

***City of Cape Coral-** Dry weather screening had to be postponed due to unseasonable rains.*

***City of Sanibel-** Andy Tilton shared a copy of a stormwater brochure which could be used in the formulation of similar public awareness materials. He also suggested the APWA as a potential source for training.*

***Town of Fort Myers Beach-** Absent*

***Gateway Services-** Discussed how contractors were reacting to having to provide NPDES applications and SWP3s at pre-construction meetings.*

***East county Water Control-** The Annual report is to be presented to the Board soon, it contains NPDES responsibilities and in the future, the surface water monitoring may be modified to include additional NPDES parameters.*

***FDOT-** Dry weather to be done, reported to manage ditch spoil by storage and reuse.*

- **Other Items of Interest**

There is a Stormwater Operator Certification Program through the FWPCOA at their Annual Short School. The local Region (VIII) does not offer Stormwater certification training during their short school.

FW&PCOA State Short School

Certification of Stormwater Operators (C, B, A)... Training, August 10-14, Titusville (\$150 for members and \$165 for non-members, plus textbooks and exam), contact Rosemary Tilley, FW&PCOA Training Coordinator, 1311 N, US 1 Titusville, FL 32796 (407)267-5452.

FW&PCOA Region IV (Largo)

Offers A, B and C Training and Certifications for Stormwater System Operators at their 1998 Summer Short School, June 22-25, 7:30 AM to 4:30 PM with the exams on the 26 8:00 AM to 11:00 AM. The cost is \$150 for members and \$165 for non-members (this does not include the Manual (\$20 for the C, \$30 for the B) or exam (exam fee-\$40). Registration was to have been in by May 15, however you might call Kelsi Oswald, Pinellas County Utilities (813) 582-2282.

Discussions were held related to operator training, the potential for working through the FW&PCOA, APWA, or the WEF were thought worthy of pursuit and reports to be forthcoming next month.

- **Next Meeting: July 9 @ 1:30 PM, Public Works Building. Only a Notice of Cancellation will be sent.**

NPDES

Annual Report Committee Meeting Agenda

July 9, 1998

- **Annual Report**

Event and task tracking are important. *If you do not have an event log, start one. The event log or field sheets are not included in the Annual Report, however even if these are transferred to a database the paper copies must be retained for a period of 5 years past the end of the permit period. (The permit is valid for 5 years.) Document your activities such as structure maintenance, information or training, etc. These all need to be incorporated in the Annual Report in summary form, with comments.*

The **Annual Report** is to be submitted under one cover. If co-permittees do not have their information assembled and submitted by the date of mailing, there will be a one line note in place of their section which will state: **“No Information was available at the time of mailing. Information will follow under a separate cover.”** EPA will undoubtedly contact any co-permittee failing to submit an incomplete Annual Report.

- **All co-permittees required to provide summary of activities.**

Keep track of your activities and report them.

- **Importance of tracking permit related activities.**

“No money” is no excuse! Be sure to have a plan of action and stick with it. If you said that you were going to do something in the application, EPA wants to see it in the annual report and they can not see it, if you do not report it.

- **Reminders:**

If you have not started recording your NPDES Permit field activities, it is time to start. Make sure you have a tracking method to be able to summarize and report.

- **Interlocal Activities, Agreements, etc....**

Lee County passed the new Land Development Code, which includes a Clean Water Section. The Clean Water Provisions are available, contact Tony Pellicer if you need one. The Section relates to NPDES and includes the enforcement provisions for unincorporated Lee County.

There should be Interlocal agreements in place. Tony will go through the permit and list interlocal activities for each co-permittee, these will be distributed next month. If you have current interlocal agreements related to NPDES activities, make a note of them, approval dates, etc. These will be useful in drafting the new interlocals, bring them with you next month.

- **Reports, comments and or suggestions:**

City of Fort Myers

Need StormTRAC training. There is a California Stormwater training course via correspondence. Take advantage of local training even if \$150 per course.

City of Cape Coral

Interlocal agreement comments, will get Lee County understanding by next month. Need to amend or change as necessary.

City of Sanibel-

Continuing to keep records and no questions to date. Number of Kim Dryden @ US Fish and Wildlife provided.

Town of Fort Myers Beach-

Absent

Gateway Services

Comments related to training availability and FWPCOA Short School in Spring 99. The WEF has no Stormwater training available.

East county Water Control

Working on the interlocal items and should have within 30 days, if possible.

FDOT

Absent

San Carlos Estates

Questions about pesticide and herbicide applicators. Referred to permit for certification requirements.

• **Other Items of Interest**

- *This was the most interactive session to date.*
- **OPERATOR TRAINING**, *the potential for working through the FW&PCOA is the best bet to date. As an aside, the Lee County SQG program will hold a Vendor's Fair in September. Part of the associated classes will include stormwater in the Clean Water Act sessions. If you are interested in more locally sponsored education opportunities, have someone attend one of the two sessions on the Clean Water Act. One session will be 10:30 AM on September 28 with the second on September 29 at 10:30 AM. The more response to sessions, the more effort will be put forth toward the production of future training for BMPs. There will be no certification, but good exposure from knowledgeable instructors.*
- *We also hope to work with the FDOT to incorporate training for our stormwater system operators.*
- **Lee County Ordinance 98-11** *is now completed and is available for those wishing a copy of the Clean Water Provisions, call Tony Pellicer @ 479-8129. This covers the NPDES related items, but does not cover the remaining sections of the ordinance.*

- **Next Meeting: August 13 @ 1:30 PM, Public Works Building.**
- **Only a Notice of Cancellation will be sent.**

NPDES

Annual Report Committee Meeting Agenda

August 13, 1998

- **Annual Report**
Event and task tracking are important. These are crucial in compiling the information summaries required for the Annual Report.
- **All co-permittees required to provide summary of activities.**
Keep track of your activities and report them. This information is related to the permit requirements for each co-permittee in the Annual Report.
- **Importance of tracking permit related activities.**
Be sure to have a plan of action and stick with it. Begin with the Permit, establish how to achieve the permit requirements and use this as the basis for your action plan.
- **Reminders:**
If you have not started recording your NPDES Permit field activities, it is time to start.

If you are not sure about activities you are responsible for, ask now...
- **Interlocal Activities, Agreements, etc....**

Caroline called to say that she is preparing a permit modification...related to district activities. As of this date no word on how that is proceeding. Stay in touch. If Caroline contacts you, let everyone else know what is going on.
- **Reports, comments and or suggestions:**
 - City of Fort Myers** *Began giving hard copies of the NOI to businesses that probably qualify under Phase I. Each facility receiving a copy of the NOI and Instructions were asked to sign a receipt. Copies of the manual on how to prepare the SWP3 are available @\$15 ea.*
 - City of Cape Coral** *Dry weather screening done.*
 - City of Sanibel-** *Dry weather screening done, record keeping on target.*
 - Town of Fort Myers Beach-** *Absent*
 - Gateway Services** *Documenting activities.*
 - East County Water Control** *Good discussion on how the permit modification issue began. A call to EPA generated a need to understand how districts work and that revenues generated are kept by the districts and not turned over to the County for action.*
 - San Carlos Estates** *Absent*

- **Other Items of Interest**

A 15-minute EPA video entitled "Water Quality Based Approach to Pollution Control" was shown. Discussion centered around its potential as a public awareness item in public access television and the points raised in the video about approaches to water quality. The water quality approach leads to Total Maximum Daily Loads (TMDLs) for each water body and ultimately to Pollutant Load reduction Goals (PLRGs). This is where the NPDES Permit will go for the MS4. It is very important to begin compliance early in the permit. Otherwise, catching up later will be a strain on the budget and other resources.

- **Next Meeting: May 14 @ 1:30 PM, Public Works Building. Only a Notice of Cancellation will be sent.**

FDOT Dry weather screening next month. Question on illicit discharges and their detection. Further discussion to be had with TW.

- **Other Items of Interest**

FDEP - LAND SPREADING Sediments from catch basins are looked at for the contamination of soils. If there is contamination, the FDEP will go after the violation.

OPERATOR TRAINING, the potential for working through the FW&PCOA, APWA, or the WEF are worthy of pursuit.

STAFF AND PROFESSIONAL TRAINING, ASCE is presenting a course in Tampa on November 17 and 18. We are making arrangements to have it here on the 19 and 20. The two day local seminar is \$450, including continental breakfast, breaks and lunch. It is to be held at ECC. For more information call Tony @ 479-8129.

PRESENTATIONS, local ideas on education and training, City of Fort Myers, Recycling Coordinator, Kristen Hadd. Kristen demonstrated a model landscape. It makes for a good interactive presentation, demonstrating the effects of runoff and improvements of BMPs. She uses it at schools, local clubs and other public events where the general public benefits from learning how runoff impacts our surface waters.

NEXT MONTH if you have a presentation or topic, let's schedule it and share it with our fellow permittees..

- **Next Meeting: September 10 @ 1:30 PM, Public Works Building.**
- **Only a Notice of Cancellation will be sent.**