

Quarterly Teleconference for Florida Phase II MS4s

Wednesday, March 20, 2024

Minutes

Share the following link with other permittee representatives for them to subscribe to Phase II MS4 GovDelivery for information about future teleconference's and other pertinent MS4 related information. [Subscribe](#)

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Tony Diaz	Data Steward	850-245-8684
Sharon Surita	MS4 Support/FDOT Coordinator	

Staffing updates

- Matt Irwin has been promoted to Senior Program Analyst
- Vacant Phase I MS4 coordinator (Environmental Consultant), which we hope to fill quickly
- Sharon Surita has been assisting with FDOT as coordinator; Michelle will still be coordinating field inspections.
- Ryan Riffle our data steward last day was 3/22/24; replacing with Tony Diaz. Tony's previous position will be advertised soon.

Using code enforcement for illicit discharge implementation

Smaller municipalities may not have dedicated stormwater inspectors; using code enforcement staff is an excellent way to conduct illicit discharge inspections. o Code enforcement knows how to complete investigations. This activity needs to be documented (daily log of zones, checklist, etc.) and that should be included in the SOPs. Code Enforcement staff should be trained to conduct proactive inspections.

Q&A:

- Sally Atkins, City of Gainesville: Documentation is part of our drainage maintenance manual that everyone is trained in illicit discharge inspections. We don't have a separate checkbox in asset management.
DEP: The asset management checklist should be updated to include this specific type of inspection to ensure what is stated in the SOP is happening in the field.
Sally: Is this needed for every asset.
DEP: A daily log would suffice. Sometimes, it can be seen that illicit discharge was conducted based on a maintenance log. But this needs to be specific on whether it was

complaint-initiated or routine maintenance. We are looking for reasonable assurance that proactive inspections are happening.

- Lisa Good, City of Melbourne: If anyone has ANY SOPs related to NPDES that they are willing to share (just so I can see what others do) please email them to Lisabeth.Good@mlbfl.org.

DEP: The packet we are putting together does include examples.

File Explorer Link:

\\deppubfs\PUBFDS\DWRM\NPDES_Stormwater\MS4\PhaseII Permitee Guidance Package

ESC Inspection Compliance and Enforcement – Kristie Beeman

- Inspection needs
- Recommendation for FSESCI

Notice of Intent

We are working through the backlog of application/NOI submittals. We are finding that many NOIs need significant changes. This leads to a longer review time, and long Request for Additional Information.

In the June 2023 teleconference, we presented on writing quality NOIs. We will start including a link to pub files that house NOI references including videos in each reminder letter and RAI.

Common Deficiencies

- Having multiple Measurable Goals per BMP. Measurable goals should be combined/consolidated (i.e. develop and distribute).
- SOPs, map and ordinances not including the effective/adopted date in the Schedule for Implementation. Not reporting the effective/updated date in the measurable goal.
- Not specifying in the BMP description whether an SOP needs to be developed. For any items that need to be developed, Schedule for Implementation should be Permit Year 1.

Q & A:

- Lisa Good, City of Melbourne: For those of us that are backlogged, and are continuing our previous NOI, what are our reporting and audit years?
DEP: We will ask if we would like to see a year 6 annual report, especially if an audit is scheduled. The permit explicitly states years 2 and 4, therefore we would request a year 6 for permits that have not been reissued. We are trying to issue consent orders wherever needed so that we can continue with the permit issuance process.
- Christine Spencer, Naval Station Mayport: Would it be possible to request for 1:1 training once the new MS4 permit is issued? If so, I would like to request for an onsite training at NS Mayport. I was just audited by FDEP for my MSGP permit and found it very helpful.
DEP: We can set up a meeting to discuss best ways to implement requirements. Kristie has been putting together a resource packet that includes SOP development topics.

Link:

\\deppubfs\PUBFDS\DWRM\NPDES_Stormwater\MS4\PhaseII Permitee Guidance Package

- Amber Chambers: Is the year 6 report going to replace the year 2 report for the new permit?
DEP: No. You should continue to implement your current permit until the new permit is issued. If you submitted an application, you are responsible for implementing the issued permit, and will be administratively continued (if submitted timely). Once the new permit year is issued, the new AR would be required 1.5 years after issuance based on the new permit requirements.
- Chris Sutton, MacDill AFB: In the past, have we always had to do two public notices?
DEP: No that started as part of the federal requirements under the Remand Rule. Your Appendix A acts as your SWMP. The concern was that the SWMP was not available for review during the review period. The Two-Step permit allows for submittal of the Appendix A that goes for public comment. In the past, when we issued PII Generic Permit, DEP noticed, but there was not room for public comment. We now follow the same process as our individual permits. Permittees are required to notice the draft with 30-day comment period and then notice the intent to issue which is a 14-day petition period. Permitting process PDF attached. One of the things we rolled out is the ability to submit comments through the business portal. You can submit public comments via email to NPDES email address but also can be sent through the portal.
- Spring Renton, City of Gulf Breeze: I we had an audit, and had to provide corrective measures, and years 1-5 are over, we should be operating under our previous NOI and not the one we submitted?
DEP: Correct. So, you are still operating under the previous permit.
- Lisa Good, City of Melbourne: If we sent in a year 5 report, you want a year 6 report submitted too?
DEP: I don't think it says Years 1 – 5, it just states annually
- Karen Bliss, Charlotte County: Will the department send us the proper verbiage for the public notices as necessary?
DEP: The draft permit package includes the NOI that was approved, a cover letter signed by program administrator that provides instructions for public notice, a fact sheet, which shows all changes to the permit and a timeline which may change based on public notice posting, a word document with the language that permittees need to public notice.
- Rebecca Tackitt, Panama City: So, our Phase II NOIs must be sent for public comment before new final permit is issued?
DEP: The 30-day public comment period begins after the draft package is issued.
- Spring Renton, City of Gulf Breeze: What you just spoke about applies to MS4s?
DEP: We have specific citations referring to federal process. At the bottom of the fact sheet, there is a schedule for what the process will be and will be updated after NOI is approved.
- Spring Renton, City of Gulf Breeze: Draft and final have to be published?
DEP: Only draft and ITI.
- Lisa Good, City of Melbourne: Is there any way to get our reporting timeframe to match

our fiscal year? Life would be so much easier.

DEP: It is not feasible due to workload with over 150 different permits to get everyone on the same schedule. We can try to get as close as we can, but once applications are approved, we want to get them issued as soon as possible, and as close to the first of the month.

- Sonia Clay, City of Deltona: Sorry if you mentioned this already, but would we eventually ween away from reporting via paper and be on an electronic reporting system?

DEP: We at DEP have some deadlines that we may ask for extension. We are in the final design stages for building eReporting system in the business portal for Phase II MS4s. Once the submission portal is developed, applications will need to be submitted online. Annual reports will not be able to be submitted online until that permittee's application is submitted online and issued. Until that process is up and running, we will still require paper applications and annual reports.

CGP for “common plan of development or sale”

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CGP DEP Document No. 62-621.300(4)(a)

8.5 "Common Plan of Development or Sale" A single plan of development or sale for a site where one or more separate and distinct construction activities are occurring on one or more schedules by one or more contractors. This may include:

- Phased projects and projects with multiple lots, even if the separate phases or lots will be constructed under separate contract or by separate owners (e.g., a development where lots are sold to separate builders). A development plan that may be phased over multiple years but is still under a consistent plan for long-term development.
- Projects in a contiguous area that may be unrelated but still under the same contract, such as construction of a building extension and a new parking lot at the same facility.
- Linear projects such as roads, pipelines, or utilities.

It is the permittee's responsibility to have an ordinance to require erosion and sediment controls and waste controls, and sanctions to ensure compliance, which may include monetary penalties. (See Phase II GP below). If the permittee ordinance only talks to activities greater than or equal to one acre, the ordinance should be updated to include common plan of development or sale. The ordinance can also be amended to include the definition of common plan. DEP staff will evaluate ordinances during audit and permit reapplication.

The Site Plan review should ensure SWPPP is included in site plan submission, review of BMPs to ensure appropriate and notification of possible CGP/ERP requirements.

- 2003 and 2021 permit requirements change – see PPT.
- Recommendation to attend FSESCI training
- Construction site inspections with CGP different from MS4 inspections

The Phase II GP DEP Document 62-621.300(7)(a)

The operator of the Phase II MS4 must:

Develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the Phase II MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The term “larger common plan of development” does not refer to local comprehensive plans or growth management plans.

An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State, or local law

Q & A:

- Christine Spencer, Naval Station Mayport: I am assuming this applies to me, even though "MSGP" was not listed. Industrial permit for Naval Station Mayport.
DEP: This applies to the MS4. MSGP is regulated separately.
- Karen Bliss, Charlotte County: Can you please include this presentation with the meeting minutes? DEP: Yes, the presentation will be sent out with minutes.
- Christine Spencer, Naval Station Mayport: Because most of our contracts are under 1 acre, but all together NS Mayport is larger than 1 acre. DEP: Everyone should be noticed. Examples include signed statements at precon, acknowledgement letters, some permittees include it on the building application, etc.
- Rhonda Watkins: If facility is operating under an ERP, are WMDs required to do erosion sediment control inspections of facilities they permit? DEP: No, they are not. Rhonda: They permit it, but MS4s are responsible for enforcement? DEP: While ERP does require ESC, they do require SWPPP development. Inspections can be conducted based on complaints but that is generally triggered by complaints for review if operating effectively. In the case of SW, there are tiers of implementation and of requirement. We require each municipality to have their own ordinances and that they enforce. Ordinances may be similar to or required by same facilities (if it qualifies for CGP, it should trigger local requirements), some kind of control plan needs to be reviewed by the permittee and approved/inspected, etc. We are not asking you to inspect for the CGP or the ERP. We are requiring inspection against approved ordinances.
- VJ: We do issue an Erosion Control permit from the municipality, but we do not inspect the sites SWPPP on a daily basis. Typically, the construction site General Contractor is responsible for their site SWPPP. Are we, the municipality now responsible for their SWPPP (daily, weekly .5inch event inspections)? DEP: General contractor is responsible for maintaining SWPP. The permittee is not responsible for conducting CGP inspections, rather to inspect based on compliance with local ordinances.
- Christine Spencer, Naval Station Mayport, Naval Station Mayport, Naval Station Mayport, Naval Station Mayport: don't have a lot of CGPs at Mayport, and just a few ERPs. - Does this apply to the MSGP for NS Mayport (due to common plan of development)? DEP: The MSGP permit is not the same. You and your coordinator can discuss offline as it can differ for each permittee.

- Mike C: If construction is less than an acre and is not part of a larger project, are we required to perform an inspection? DEP: Depends on the activity. If you are constructing parcels within a University less than an acre, it would be defined under a common plan.
- Christine Spencer, Naval Station Mayport, Naval Station Mayport, Naval Station Mayport: Is there any connection between the MS4 permit and the BMAP in the BMPs? LSJR BMAP Tat. DEP: in the 2003 BMAP implementation and TMDL prioritization was not a requirement. As of the 2021 permit, BMAP implementation is now a requirement. We don't handle direct correspondence, that would be handled under DEAR. For MS4s, permittees are required to address TMDLs, where the department has already written a BMAP. That acts as an implementation plan. Many of the BMAP activities are very similar to MS4 activities (i.e. sweeping, E&O, SW system maintenance, SW retrofits, BMP installation). We also permit based on discharges to TMDL. The BMPs are to reduce pollutant runoff, whether to reduce to impaired waters with TMDL and implementation plan or if its any other water body. We can discuss water quality as part of implementation plan. Without knowing loading or WB, it may be hard to develop projects to reduce loading.
- Eric Silva-Quintero: Can we have access to this presentation for reference later? DEP: This will be included in the meeting minutes.
- Steven Kelly, FDOT District 1 : Recommend reviewing the EPA's NPDES Storm Water Program Questions and Answers - January 21, 2004. It covers most of these topics including what regulations apply to military facilities. DEP: We can provide that documentation within the minutes.
- Marion County: So, if a construction site is in violation of their CGP and/or ERP, the enforcing agency would be FDEP and/or WMD, correct? because I want to know FDEP's interpretation since the permit is from FDEP not EPA. DEP: If in violation of ERP that is a District violation. If ordinances are not maintained, that is an MS4 violation. Both the municipality and DEP has enforcement authority. We are required to inspect 6 CGPs. Where there are chronic issues, The District office is notified, and DEP can conduct a DEP CGP inspection which is generally more detailed than what municipal inspections might be. DEP has been given authority by EPA to implement the program. This is similar to air and water sections. DEP is authorized to do permitting and compliance with NPDES. DEP is audited by EPA. Recently near the Opa Locka area, we had EPA oversight. We don't have authority over tribal lands. Those are handled differently.

Draft CWA 6PPD-q method published

The U.S. Environmental Protection Agency announced on January 30, 2024 the publication of a draft testing method (EPA Method 1634) that will enable government agencies, Tribes, and other groups to determine where and when 6PPD-quinone is present in local stormwater and surface waters. The draft method can be accessed at [this link](#) and is linked through EPA's [CWA methods homepage](#).

FSESCI Training

The Division of Environmental Assessment and Restoration's (DEAR) Water Quality Restoration Program (WQRP) will be holding a Florida Stormwater, Erosion, and Sedimentation Control Inspector (FSESCI) Training Program class through Microsoft Teams for public employees. If you are unfamiliar with our class or would like additional details, please visit the [website](#). This class will be open to anyone who has not yet qualified as an FSESCI Inspector. The class will be held through Microsoft Teams on April 23rd (from 9:00 AM ET to 4:30 PM ET) and April 24th (from 9:00 AM ET to 2:00 PM ET). The exam will be conducted through a testing website using the participant's browser at the end of the second day.

Annual Report Correspondence

Submit Annual Reports and responses to Department correspondence to:

NPDES-MS4@floridadep.gov.

Audits to be Conducted by September 30, 2024

Note that this depicts a tentative list that is subject to change

*inspection required

Coordinator	Permittee	Permit #	Audit Conducted
Kristie Beeman	Town of Melbourne Beach	FLR04E041	3/13/2024
Kristie Beeman	Town of Ponce Inlet	FLR04E071	1/23/2024
Kristie Beeman	City of Satellite Beach	FLR04E072	3/14/2024
Kristie Beeman	Town of Orange Park	FLR04E075	2/20/2024
Kristie Beeman	City of DeLand	FLR04E078	
Kristie Beeman	City of Titusville	FLR04E079	
Beth Robertson	Naval Air Station Jacksonville	FLR04E091	2/22/24
Beth Robertson	Florida International University	FLR04E092	
Kristie Beeman	City of Deltona	FLR04E099	
Beth Robertson	City of Eustis	FLR04E100	
Kristie Beeman	City of Green Cove Springs	FLR04E103	1/25/2024
Beth Robertson	Town of Lady Lake	FLR04E105	1/31/24
Beth Robertson	Lake County	FLR04E106	
Beth Robertson	City of Umatilla	FLR04E108	
Beth Robertson	City of Leesburg	FLR04E110	1/30/24
Beth Robertson	City of Fruitland Park	FLR04E114	
Kristie Beeman	City of DeBary	FLR04E120	
Kristie Beeman	City of Panama City Beach	FLR04E123	2/8/2024
Kristie Beeman	City of Sebastian	FLR04E124	3/12/2024
Kristie Beeman	City of Orange City	FLR04E126	
Michelle Bull	FDOT 6	FLR04E132	
Kristie Beeman	City of Clewiston	FLR04E134	
Kristie Beeman	Glades County	FLR04E137	
Kristie Beeman	Hendry County	FLR04E138	
Michelle Bull	FDOT 7 - Citrus County	FLR04E142	
Beth Robertson	City of Inverness	FLR04E144	
Kristie Beeman	City of Palm Coast	FLR04E145	1/24/2024
Beth Robertson	City of Mascotte	FLR04E146	
Michelle Bull	FDOT 1 - Highlands	FLR04E147	
Kristie Beeman	Highlands County	FLR04E148	
Kristie Beeman	City of Sebring	FLR04E149	
Beth Robertson	City of Dunnellon	FLR04E154	
Beth Robertson	Town Of Montverde	FLR04E155	
Beth Robertson	University of North Florida	FLR04E158	2/21/24
Kristie Beeman	City of Okeechobee	FLR04E160	
Beth Robertson	City of Wildwood	FLR04E162	



MS4 PERMITTING

NEW PHASE I MS4 PERMIT DEVELOPMENT

Draft Permit Package

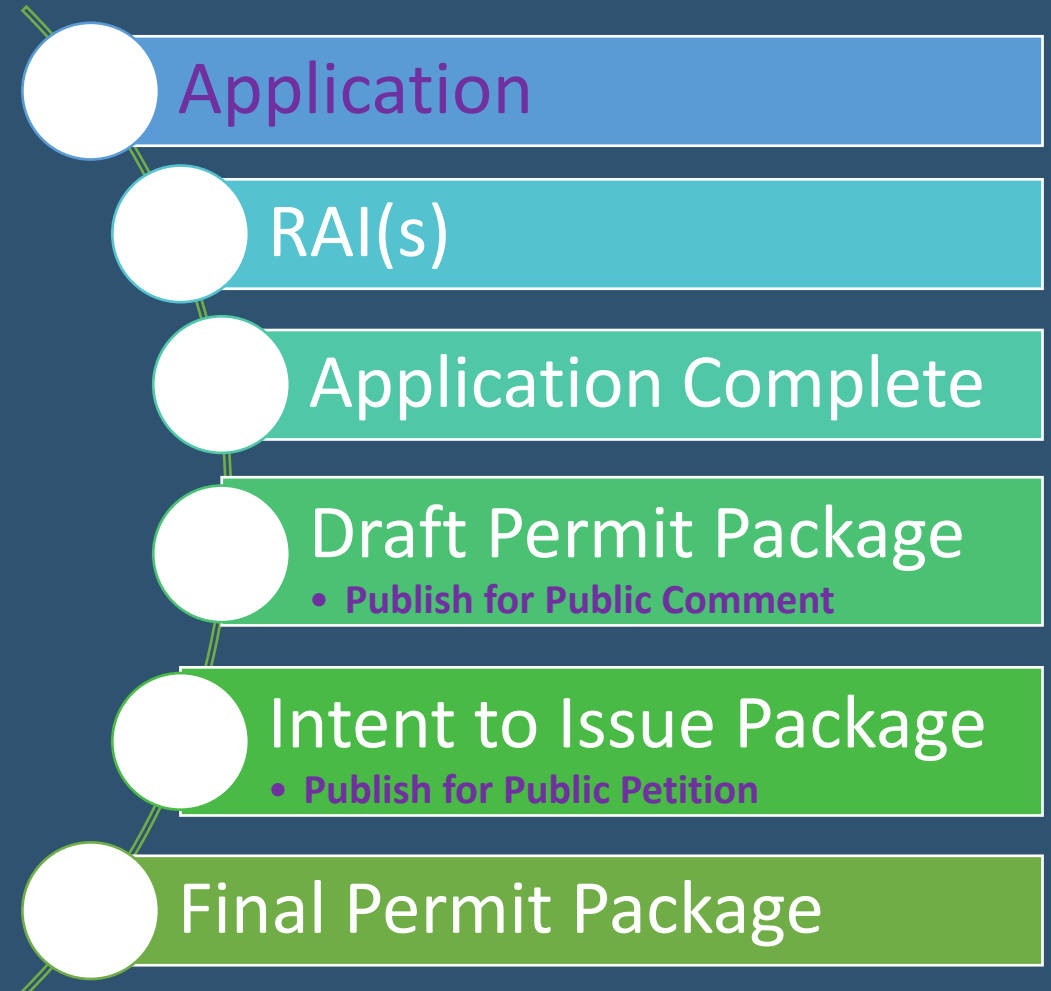
- Lead permittee has 30 days to publish a public notice of draft permit
 - Submit proof of publication to DEP within 14 days
- Public comment period is open for 30 days after public notice publication

Intent to Issue (ITI)

- If no comments received, DEPs objective is to issue an ITI within 7 days of public comment closure
- Lead permittee has 30 days to publish a notice of the ITI
 - Submit proof of publication to DEP with 7 days
- Public petition period is open for 14 days after publication

Final Permit

- If no petition received, DEPs objective is to issue the final permit within 7 days of petition closure
- DEP attempts to publish permit(s) on/near the first of the month





CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

KRISTIE BEEMAN

Water Resource Management / Stormwater and Technical Services
Florida Department of Environmental Protection

Phase I & II Quarterly Teleconference| March 20, 2024



OVERVIEW OF REQUIREMENTS

AGENDA

- Definitions
- Ordinances
- Site Plan Review
- Construction Site Inspection SOP
- Construction Site Inspection: During the Inspection
- Inspection Documentation
- Follow-up Documentation





DEFINITIONS

- “Common plan of development” – A single plan of development or sale for a site where one or more separate and distinct construction activities are occurring on one or more schedules by one or more contractors.
- “CGP” – Construction Generic Permit, an NPDES Permit required for construction sites larger than an acre or part of a common plan of development
- “ERP” – Environmental Resource Permit, a permit issued in Florida by the Water Management Districts for the design of new stormwater systems.



PHASE II

REQUIREMENTS FOR ORDINANCES

An ordinance or other regulatory mechanism to require erosion and sediment controls, and control of wastes, as well as sanctions to ensure compliance, to reduce pollutants in any stormwater runoff to the MS4 from construction activities that will result in a land disturbance of greater than or equal to one acre AND construction activity disturbing less than one acre if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.

- Require appropriate erosion, sediment, and waste controls on construction sites
- Definition of size of construction site that requires ESW controls
 - sites that require CGPs:
 - 1 acre or larger OR
 - part of a common plan of development or sale



SITE PLAN REVIEW

SUMMARY

- Site plans should be reviewed for Erosion, Sediment, and Waste Controls
 - Also referred to as an Erosion and Sediment Control Plan, or a SWPPP
- Review should consist of
 - Ensuring SWPPP is included in site plan submission
 - Review of the BMPs to ensure they are appropriate and deal with the construction activities to be conducted on site
 - Notification of possible CGP/ERP requirements



PHASE II 2003 GENERIC PERMIT

RULE 62-621.300(7)(A), F.A.C.

(f) Procedures for site inspection and enforcement of control measures.

b. Acceptable efforts may include but are not limited to:

(1) Sanctions to ensure compliance. Examples include stop-work orders, non-monetary penalties, fines, bonding requirements and/or permit denials for non-compliance;

(2) Procedures for site plan review including the review of individual pre-construction site plans to ensure consistency with Department, Water Management District, or local sediment and erosion control requirements as appropriate;

(3) Steps to identify priority sites for inspection and enforcement based on the nature of the construction activity, topography, and the characteristics of soils and receiving water quality;

(4) Providing educational and training measures for construction site operators which may include inspector training under the Florida Stormwater Erosion and Sedimentation Control Inspector Training Program; and

(5) Requiring submittal of proof of an issued Department or Water Management District Stormwater Discharge or Environmental Resource Permit before issuance of local approvals for site clearing or construction.

c. The operator of the Phase II MS4 must define appropriate BMPs for this minimum control measure and measurable goals for each BMP. In the context of this minimum control measure, the term BMP is understood to include activities and programs undertaken to implement the construction site stormwater runoff control efforts required under this generic permit.



PHASE II 2021 GENERIC PERMIT

TITLE 40 CFR §122.34(B)

f. Develop and implement a SOP for construction site inspection and enforcement of control measures. The SOP for construction site stormwater runoff control program inspections shall include:

1. Prioritization of sites for inspection based on the nature and extent of the construction activity, topography, and characteristics of soils and receiving water quality.
2. Implementation of techniques for inspection to ensure the selection, installation and maintenance of BMPs is consistent with the regulatory mechanism required in Part V.B.4.a of this generic permit.
3. Enforcement responses such as warnings, stop-work orders, non-monetary penalties, fines, bonding requirements, referrals and/or permit denials to address non-compliance, to the extent allowable under state and local law.
4. Verification the construction site operator has received coverage under paragraph 62-621.300(4)(a), F.A.C., and/or Chapter 62-330, F.A.C., if required.



CONSTRUCTION SITE INSPECTION SOP BREAK-DOWN

PHASE I & PHASE II 2021 PERMIT REQUIREMENT

- **Why** inspect these sites?
 - Prioritization of Sites based on the construction activity
 - Department requires all sites larger than 1 acre or part of a common plan of development to be inspected.
 - Sites near impaired water bodies should be inspected more frequently.
 - Sites that have repeated violations or pose an environmental threat should be inspected more frequently.
 - Frequent rainfall
 - Repeated violations
- **Who** is doing the inspections and what qualifications do they need to have?
 - Department recommends that inspectors attend FSESCI training.
 - No requirements for inspector if they understand what erosion, sediment, and waste control BMPs should be in place
 - The Construction Site Operator inspections do NOT count as an MS4 construction site inspection.



CONSTRUCTION SITE INSPECTION SOP BREAK-DOWN

PHASE I & PHASE II 2021 PERMIT REQUIREMENT

- **What** are you inspecting for?
 - What types of BMPs does the municipality (LDC) require?
 - Do the BMPs on site match what is on the site plans (SWPPP)?
 - Are the BMPs listed on the site plan sufficient?
 - Are the BMPs installed correctly?
 - Are the BMPs appropriate?
- **When** are the inspections conducted?
 - Department expectation is sites requiring a CGP be inspected monthly.
- **Where** are the inspections conducted?
 - Municipalities should have a way of tracking the sites that are active within the city that meet the criteria for inspection.

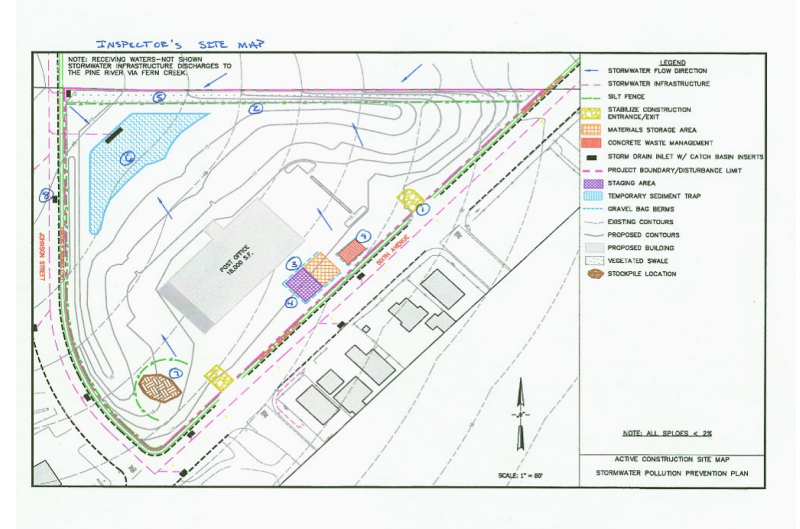


DURING THE INSPECTION

DEPARTMENT STANDARDS



NOTICE OF INTENT TO USE NPDES GENERIC PERMIT FOR STORMWATER DISCHARGE FROM LARGE AND SMALL CONSTRUCTION ACTIVITIES (RULE 62-621.300(4), F.A.C.)



Stormwater Construction Site Inspection Report			
General Information			
Project Name	Stormville Postal and Distribution Center		
NPDES Tracking No.	NHR10BX01	Location	3100 Sixth Ave., Stormville, NH 03061
Date of Inspection		Start/End Time	
Inspector's Name(s)	Ms. Martina Davis		
Inspector's Title(s)	Stormwater Compliance Officer		
Inspector's Contact Information	(603) 444-3210		
Inspector's Qualifications	See Section 5, Part 5.1 of the SWPPP		
Describe present phase of construction			
Type of Inspection: ☐ Regular ☐ Pre-storm event ☐ During storm event ☐ Post-storm event			
Weather Information			
Has there been a storm event since the last inspection? ☐ Yes ☐ No			
If yes, provide: Storm Start Date & Time: Storm Duration (hrs): Approximate Amount of Precipitation (in):			
Weather at time of this inspection? ☐ Clear ☐ Cloudy ☐ Rain ☐ Sleet ☐ Fog ☐ Snowing ☐ High Winds			
Other: Temperature:			
Have any discharges occurred since the last inspection? ☐ Yes ☐ No			
If yes, describe:			
Are there any discharges at the time of inspection? ☐ Yes ☐ No			
If yes, describe:			
Site-specific BMPs			
- Number the structural and non-structural BMPs identified in your SWPPP on your site map and list them below (add as many BMPs as necessary). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required BMPs at your site. - Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.			
BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes
1 Stabilized Construction	☐ Yes ☐ No	☐ Yes ☐ No	



INSPECTION CHECKLIST

DEPARTMENT RECOMMENDATIONS

- The following should be included on your inspection checklists
 - Date
 - Inspector
 - Site
 - Purpose of Inspection (Routine or Due to Complaint)
 - If the CGP/ERP (if required) was present
 - What BMPs are present
 - Are BMPs properly maintained?
 - Are BMPs sufficient?
 - Follow-up actions?
 - Comments



FOLLOW-UP DOCUMENTATION

- Follow-up may occur because of a previous deficient inspection, complaints, or other concerns
- Follow-up and violations must be recorded as well as the site inspections themselves
 - The Department recommends having a section on inspection forms specifically for follow-up to consolidate paperwork.
 - Follow-up should be regarding violations or sanctions, reinspection due to previous deficiencies, or complaints from the public.



THANK YOU

Kristie Beeman

Division of Water Resource Management
Stormwater and Technical Services
Florida Department of Environmental Protection

Contact Information:

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