



# Alachua County Environmental Protection Department

Chris Bird, *Director*

May 1, 2008

Sally Adkins  
City of Gainesville  
Public Works, M.S. 58  
P.O. Box 490  
Gainesville, FL 32602-0490

RE: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM QUARTERLY  
REPORT. JANUARY – MARCH, 2008. FY 2008 – SECOND QUARTER

Dear Ms. Adkins:

In accordance with the Interlocal Agreement between Alachua County and the City of Gainesville for the Establishment of an Illicit Discharge Detection and Elimination Program, enclosed please find the Illicit Discharge Detection and Elimination Report for the Second Quarter of Fiscal Year 2008 (January - March 2008).

Please contact me at 264-6806 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink that reads "A. Olmos".

Agustin Olmos, P.E.  
Water Resources Supervisor

cc: Chris Bird (email)      John Mousa (email)      Anthony Dennis (email)  
Dave Cerlanek (email)      Ha Kurz (email)      Kathy Fanning (email)  
Teresa Scott (email)      Stewart Pearson (email)      Alan Obaigbena (email)  
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# ILLCIT DISCHARGE DETECTION AND ELIMINATION PROGRAM QUARTERLY REPORT

**JANUARY - MARCH 2008**  
**SECOND QUARTER – FY 2008**

## **SECTION 1: PROGRAM DESCRIPTION**

On September 20<sup>th</sup>, 2001 Alachua County, the City of Gainesville, and the Florida Department of Transportation (FDOT) signed an interlocal agreement for the joint implementation of the National Pollutant Discharge Elimination System (NPDES) Phase II Municipal Separate Stormwater Systems (MS4) program in the Gainesville Urbanized Area. The agreement presented a financial plan for the implementation of the minimum control measures, including mapping requirements, public outreach, operations best management practices and illicit discharge detection and elimination program, required by the NPDES Phase II MS4 program. The agreement established the City of Gainesville as the lead agency for the joint implementation of the program.

On August 27<sup>th</sup>, 2002 Alachua County adopted the Water Quality Code. The Water Quality Code provided the regulatory framework for the implementation of the illicit discharge detection and elimination program in Alachua County. Specifically, Section 77.10 contained regulations regarding prohibitions on non-stormwater discharges into the MS4 system. The Water Quality Code became effective on January 1<sup>st</sup>, 2003.

On June 24<sup>th</sup>, 2003 Alachua County and the City of Gainesville signed an interlocal agreement for the establishment of the illicit discharge detection and elimination program. As part of the agreement, the Alachua County Environmental Protection Department (ACEPD) became the agency responsible for the implementation of the illicit discharge detection and elimination program to satisfy the NPDES Phase II MS4 permit requirements of Alachua County, City of Gainesville and FDOT. Individual NPDES Phase II MS4 permits were obtained by Alachua County on July 8<sup>th</sup>, 2003, City of Gainesville on July 8<sup>th</sup>, 2003, and FDOT on June 23<sup>rd</sup>, 2003.

This report presents a summary of the activities conducted during the first quarter of Fiscal Year 2008 (January - March 2008) by ACEPD staff as part of the illicit discharge detection and elimination program implementation for Alachua County, the City of Gainesville and FDOT as required by their respective NPDES Phase II MS4 permits.

## **SECTION 2: BMP 3C-03. FACILITY INSPECTION PROGRAM**

In order to comply with condition BMP3 C-03 of the NPDES permit, ACEPD expanded its existing Hazardous Materials Management Code (HMMC) and Small Quantity Generator (SQG) inspection program to include compliance with the requirements of Section 77.10 of the Alachua County Water Quality Code. The expanded inspection program included visual inspection of storm drains and storm water management system in the vicinity of each facility, visual inspection of floor drains inside the facility and when necessary collection of water quality samples.

Between January – March 2008, ACEPD staff conducted a total of 64 inspections, including 56 routine and 8 follow-up inspections. Table 2.1 shows a summary of the inspections by ZIP code and Table 2.2 shows a summary of the inspection by Standard Industrial Category (SIC). No violations of the Alachua County Water Quality Code were observed during the compliance inspections. ACEPD recorded the latitude and longitude coordinates of each facility inspected for mapping purposes.

**Table 2.1 Facility Inspections by ZIP Code**

<b>Zip Code</b>	<b>Inspections</b>
32609	16
32601	13
32608	12
32607	5
32605	4
32643	3
32615	3
32606	3
32669	2
32653	2
32694	1
<b>Total</b>	<b>64</b>

**Table 2.2 Facility Inspections by SIC Code**

<b>Sic code</b>	<b>Inspections</b>
7216 - Services - dry cleaning plants except rug	11
7533 - Services - auto exhaust system repair shops	10
7532 - Services - top and body repair and paint shops	7
7542 - Services - car washes	7
7699 - Services - repair services NEC	3
5399 - Retail trade - miscellaneous general merchandise stores	2
7549 - Services - automotive services NEC	2
7384 - Services - photofinishing laboratories	1
1541 - Construction - industrial buildings and warehouses	1
1721 - Construction - painting and paper hanging	1
3492 - Manufacturing - fluid power valves and hose fittings	1
3669 - Manufacturing - communications equipment, NEC	1
3679 - Manufacturing - electronic components NEC	1
5088 - Wholesale trade - transportation equipment and supplies	1
5091 - Wholesale trade - sporting and recreational goods	1
5099 - Wholesale trade - durable goods NEC	1
5169 - Wholesale trade - chemicals and allied products NEC	1
5211 - Retail trade - lumber and other building materials	1

5571 - Retail trade - motorcycle dealers	1
5941 - Retail trade - sporting goods and bicycle shops	1
7032 - Services - sporting and recreational camps	1
7334 - Services - photocopying and duplicating services	1
7537 - Services - automotive transmission repair shops	1
7538 - Services - general automotive repair shops	1
7933- Services - bowling centers	1
8041 - Services - offices and clinics of chiropractors	1
8734 - Services - testing laboratories	1
9983 - Medical/veterinary clinics - Florida CASV	1
9987 - Automotive paint and body - Florida CASAV	1
<b>Total</b>	<b>64</b>

**SECTION 3: BMP 3C-04. COMPLAINT & SPILL RESPONSE PROGRAM**

In order to comply with condition BMP3 C-04 of the NPDES permit, ACEPD expanded its existing complaint and spill investigation program to include compliance with the requirements of Section 77.10 of the Alachua County Water Quality Code. In addition to the complaints received via phone and email, ACEPD staff is also part of the Alachua County notification system that provides 24-hours a day response to spills in the County.

Between January – March 2008, ACEPD staff responded to a total of 49 water quality related complaints and spills. Table 3.1 shows a summary of the complaints and spills investigated by Type and Table 3.2 shows a summary of the complaints and spills by ZIP code. Investigation of the above referenced incidents resulted in the issuance of 3 written warnings and 6 civil citations. ACEPD recorded the latitude and longitude coordinates of each incident investigated for future mapping purposes.

**Table 3.1 Complaints by Type**

<b>Type</b>	<b>Investigations</b>
Hazardous Materials	18
Waste Water	11
Water Quality	9
Erosion and Sedimentation	9
Solid Waste	2
<b>Total</b>	<b>49</b>

**Table 3.2 Complaints by Zip Code**

<u>Zip Code</u>	<u>Investigations</u>
32601	13
32606	5
32609	5
32605	4
32615	4
32667	4
32607	3
32608	3
32694	3
32669	2
32618	1
32641	1
32653	1
<b>Total</b>	<b>49</b>

**SECTION 4: BMP 3C-05. PUBLIC OUTREACH**

In order to comply with condition BMP3 C-05 of the NPDES permit ACEPD staff provided compliance assistance information and distributed Best Management Practices fact sheets as part of the facility inspection and complaint and spill investigation programs.

In January the first edition of the Wader was released and sent to over 1,000 people. The Wader is an electronic newsletter with a focus on outreach efforts of ACEPD and its partnering organizations. On 1/26/2008 staff had an information table at the Air Potato Round Up. ACEPD assisted WAV with Splash Night at Lake Forest Elementary School on 3/16/2008. On 3/13/2008 staff gave a presentation on Alachua County's Erosion and Sediment Control program at the 2<sup>nd</sup> Annual Water and Erosion Conference at the University of Central Florida. In mid March staff did a seven minute florida friendly landscaping segment with Wendy Wilber (FYN) on County Update. This show is aired three times a day for a month on TV12. The Florida Stormwater and Erosion Control Inspector class was taught by staff on 3/19/2008 and 3/20/2008 in which 50 more people became certified inspectors.

To date ACEPD staff has completed and distributed the following fact sheets:

- Water Quality Code Fact Sheet
- BMP for Erosion and Sedimentation Control at Construction Sites
- BMP for Controlling Runoff from Car Wash Fundraisers
- BMP for Controlling Runoff from Gas Stations
- BMP for Controlling Runoff from Commercial Outdoor Car Washing
- BMP for Water Quality Protection at Apartment Complexes
- BMP for Landscaping & Lawn Maintenance Services

- BMP for Controlling Runoff during the Remediation of Contaminated Sites
- Residential Swimming Pool Maintenance
- Pressure Washing Activities
- Laundry Services
- Food Service Industry
- Paint contractor
- Construction Project Erosion and Sediment Control
- Codes/Building Inspector Erosion and Sediment Control BMP
- Pet Waste and Water Quality
- Septic Tank BMP

## **SECTION 5: SPECIAL PROJECTS**

### **Inlet Protection Pilot Project**

A draft report of has been completed and the following summarizes the findings. The Inlet Protection Pilot Project did not find significant nutrient loads that exceeded the total maximum daily loads (TMDLs) of local surface waters; with respect to the locations studied. However, for the amount of total recoverable petroleum hydrocarbons (TRPH) retained it may be justifiable to use inlet filter devices in areas where fuel contamination is likely since the concentrations were found to exceed the soil cleanup target levels for residential sites at three inlets and exceeded freshwater leachability at all four inlets. The study did indicate that better BMP implementation can be utilized to reduce contributions of nutrients and sediments to our local waters.

Some recommendations from the pilot study are:

1. Evaluate the BMPs at the two study sites, and implement further study of a longer duration at the TRPH contributing site.
2. Perform a study in a higher traffic retail area.
3. Conduct additional studies using Ultra DrainGuard Oil & Sediment Plus Model which utilizes X-TEX filter strips (which increase hydrocarbon removal from runoff).
4. Utilize the inlet filter devices in complaint and problem sites where sediments, nutrients or TRPH are a potential problem.
5. Conduct a storm event monitoring study to evaluate concentrations and loading of selected metals and TRPH to the urban creeks.
6. Encourage “green businesses” to use and maintain inlet filters at their own expense to protect water quality

Inlet filter devices alone are not a quick fix, but may be used to enhance BMPs or to identify problem areas that can be fixed by improving BMPs at the site.

### **Microbial Hot Spot Testing**

A draft report has been written and was peer reviewed by Dr. Harwood with the University of South Florida. Dr Harwood came to Gainesville on Feb 1<sup>st</sup> and visited some of the sites and discussed strategies with ACEPD to further address these hot spot areas. In the afternoon some of the other stakeholders (GRU, ACHD, Biological Consulting Services, and FDEP) joined us in a discussion with Dr. Harwood.

A Hot Spots Stakeholder group has formed to implement source detection and elimination strategies in the hot spots. The stakeholders include ACEPD, COG, GRU, and FDEP. PBS&J has been hired to compile all of the stakeholder's data and antidotal information to help form the strategies. PBS&J and stakeholders met for a "Maps on the Table" exercise on Feb 20<sup>th</sup> and a watershed tour on March 5<sup>th</sup>. PBS&J has acquired more data and is running additional analyses. ACEPD is planning to walk the creeks and sample outfalls and tributaries in May or June.

**Pet Waste**

ACEPD is working on creating a social marketing campaign to address pet waste. The SWFWMD is currently in the process of doing benefit and barrier research that should be applicable to the Gainesville area. Staff plans to use their research and work with their staff on coming up with a marketing campaign.