

NPDES Report Audit Process

September 5, 2025

Athena Tipaldos



Notification of Audit Letter

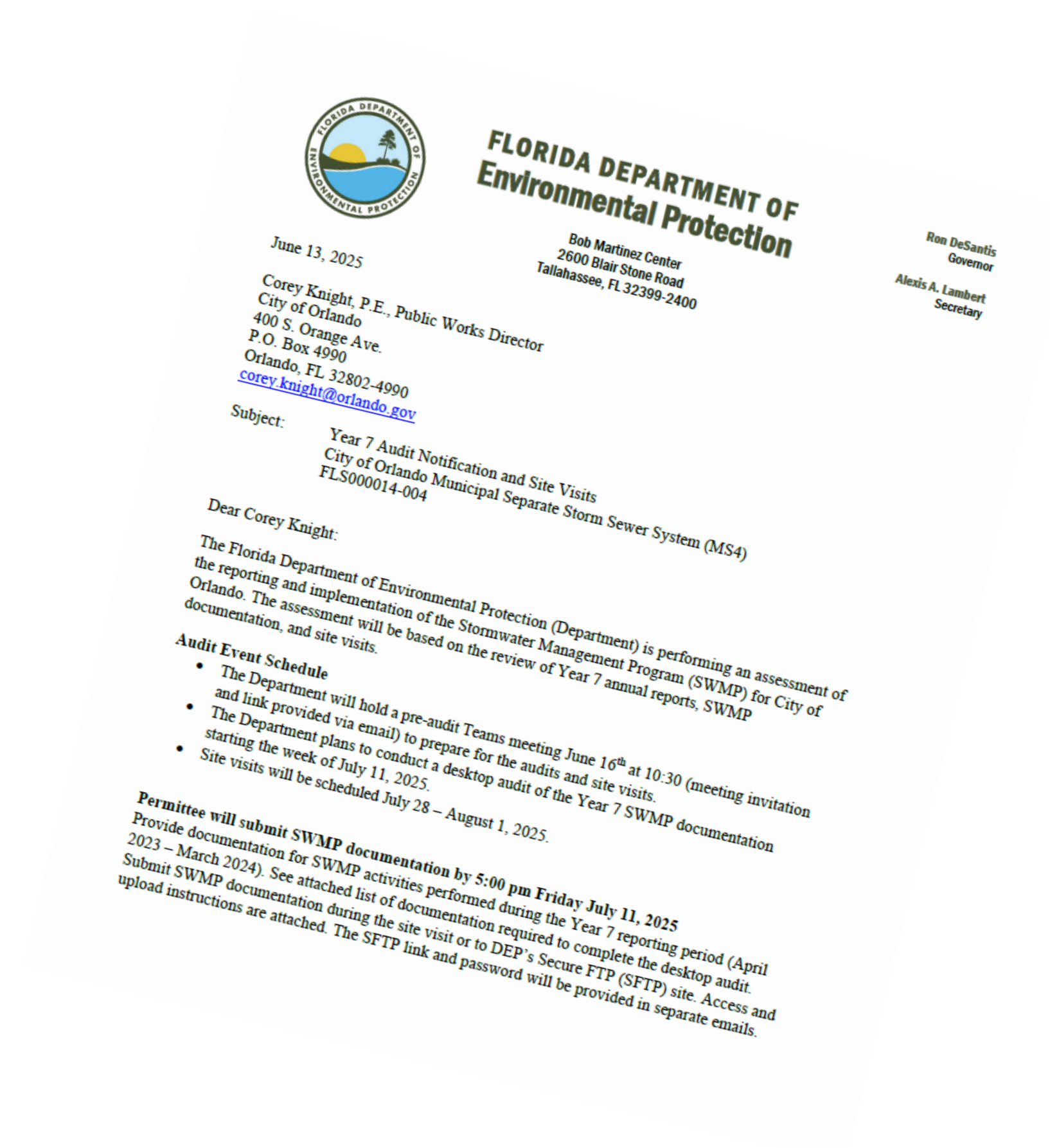
A letter was received via email stating that an audit of the MS4 was scheduled.

- A pre-audit Teams meeting invitation was provided in the email.

The letter discussed that there were two portions to the audit:

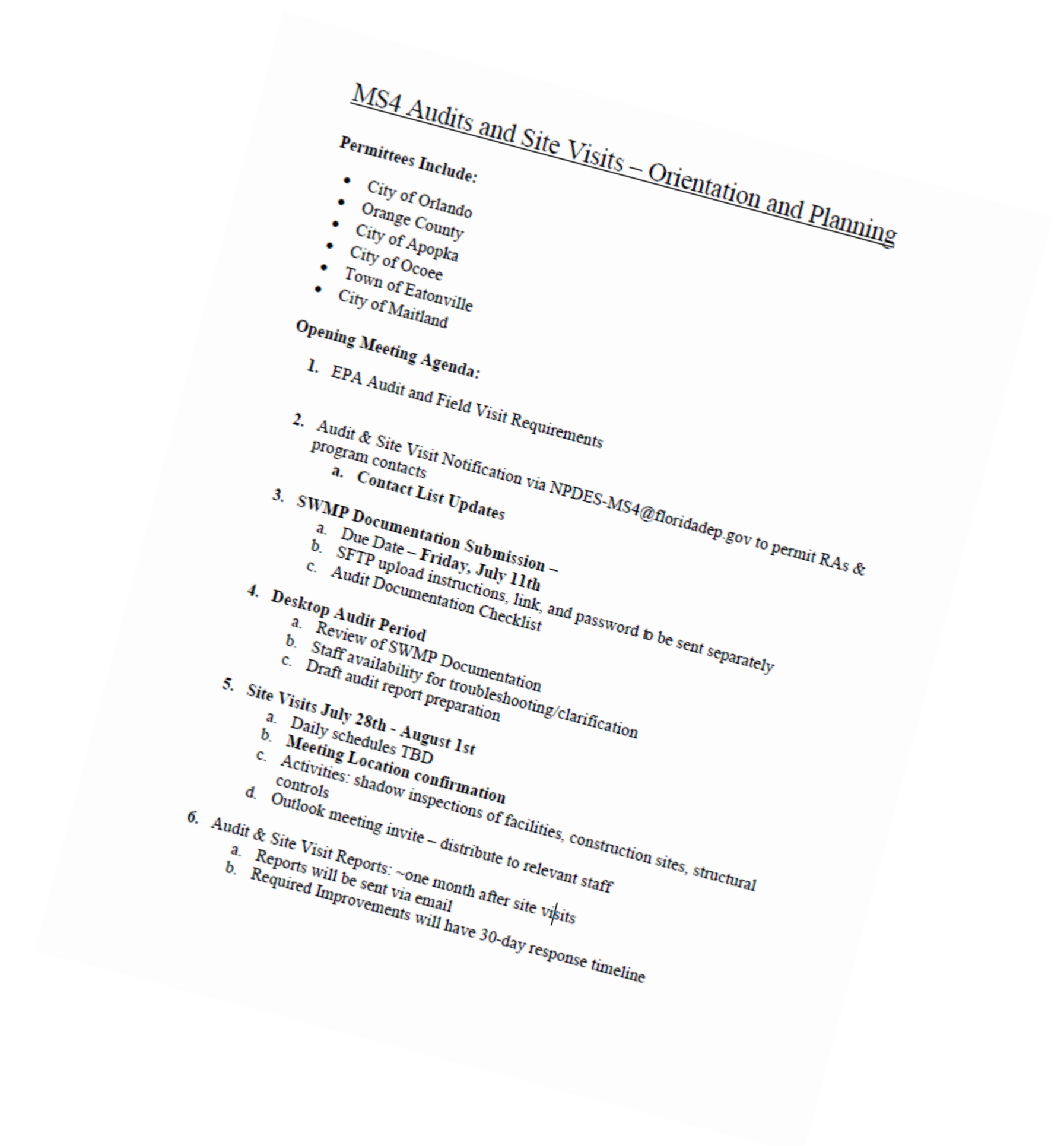
- A desktop audit of documentation
- Site visits

Dates for each of these items were included in the letter.



Agenda for the Orientation and Planning Info Teams Meeting

1. Field Visit Requirement
2. Contact List Updates
3. SWMP Documentation Submission
4. Desktop Audit Period
5. Site Visit Info
6. Audit & Site Visit Reports: ~one month after site visits



SWMP Documentation Submission

Example SFTP Folder Structure - Based on permit and Annual Report sections

Name

- III.A.1
- III.A.2
- III.A.3
- III.A.4
- III.A.5
- III.A.6
- III.A.7
- III.A.8
- III.A.9

Example Document / File names - short, descriptive, no special characters

Name

- InspectionMaintenanceSOP
- InventoryMapMajorOutfalls
- StormDrainCleaningRecords

SWMP Documentation Submission Info

Our request included items for these sections which were uploaded to the FDEP FTP site through a provided link:

Part III.A.1 – Structural Controls and Stormwater Collection System Operation

Part III.A.2 – Areas of New Development and Significant Redevelopment

Part III.A.3 – Roadways

Part III.A.4 – Flood Control Projects

Part III.A.5 – Municipal Waste Treatment, Storage, or Disposal Facilities

Part III.A.6 – Pesticide, Herbicide, and Fertilizer Application

Part III.A.7 – Illicit Discharge and Improper Disposal

c. Inspection and Investigation of Suspected IDID

d. Spill Prevention and Response

e. Public Reporting

f. Oils, Toxics, and Household Hazardous Waste Control

g. Limitation of Sanitary Sewer Seepage

Part III.A.8 – Industrial and High-Risk Runoff

a. Identification of Priorities and Procedures for Inspections

b. Monitoring of High Risk and Industrial Facilities

Part III.A.9 – Construction Site Runoff

a. Site Planning and Non-structural & Structural Best Management Practices

b. Inspection and Enforcement

c. Site Operator Training

Documentation checklist for Phase I MS4 Audit

A Specific list of documents will be sent for your audit

Documentation checklist for Phase I MS4 Audit

- The content below is representative of the documents or records that support reporting in Annual Reports, and reviewed during Audits
- If any of the content listed below exists in a combined document, or under a shared heading, please indicate upon submittal.
- Be prepared to provide any additional documentation, otherwise not listed below, that support the information captured in the latest Annual Report.

Part III.A.1 – Structural Controls and Stormwater Collection System Operation

Inspection & Maintenance SOP
Inventory and map of major outfalls
Inventory of structural controls
Inspection & maintenance records <ul style="list-style-type: none"> listing of total inspection and maintenance activities by type of structure all inspection records for reported structural controls

Part III.A.2 – Areas of New Development and Significant Redevelopment

Copy of supporting code/ordinance
Application review process for stormwater treatment
Application tracking information (including a description by type)

Part III.A.3 – Roadways

Litter Control SOP
Street Sweeping SOP and Map
Litter control records/logs
Street sweeping records/logs
Maintenance & Equipment Yard Inspection SOP, including a list of facilities
Maintenance & Equipment Yard inspection checklists/reports

Part III.A.4 – Flood Control Projects

Stormwater Master Plan, or equivalent
Listing and description of new or retrofit flood control projects

Part III.A.5 – Municipal Waste Treatment, Storage, or Disposal Facilities

Facility Inspection SOP, including a list of facilities and their activities
Facility inspection records/reports

Part III.A.6 – Pesticide, Herbicide, and Fertilizer Application

Name and effective date of supporting code/ordinance
Pesticide, herbicide, and fertilizer application SOP
Roster or list of employee and contractor training, licensing, and/or certification (indicating number and type of license/certification)
Tracking of herbicide, pesticides and fertilizers applied: chemicals, areas, amount and dates
Public Education & Outreach SOP
Tracking of education & outreach materials distributed
Tracking of education & outreach events and activities

Part III.A.7 – Illicit Discharge and Improper Disposal

c. Inspection and Investigation of Suspected IDID

Proactive Inspection SOP
Reactive Inspection SOP
Proactive inspection records <ul style="list-style-type: none"> listing and description of all proactive inspections reported all inspection reports reports of follow up activity for all inspections where an illicit discharge was discovered
Reactive inspection records <ul style="list-style-type: none"> listing and description of all complaints received and investigations reported all inspection reports follow up activity for all investigations where an illicit discharge was discovered
Training SOP
Roster or list of personnel training activities and events

d. Spill Prevention and Response

Spill Response SOP
Documentation of spill response activities

Training SOP
Roster or list of personnel training activities or events

e. Public Reporting

Public Education & Outreach SOP
Public education and outreach <ul style="list-style-type: none"> description of how public reporting is conducted Tracking information on public reports
Tracking of public education and outreach materials distributed

f. Oils, Toxics, and Household Hazardous Waste Control

Public Education & Outreach SOP
Tracking of public education and outreach numbers reported and materials distributed
Tracking of public event activities and events (including waste collection records)

g. Limitation of Sanitary Sewer Seepage

Sanitary Sewer Overflow/ Inflow & Infiltration SOP
Documentation of SSO/I&I prevention activity
Documentation of SSO/I&I incidents, including cleanup activity

Part III.A.8 – Industrial and High-Risk Runoff

a. Identification of Priorities and Procedures for Inspections

HRF Inspection SOP
HRF inventory
HRF inspection reports and checklists

b. Monitoring of High Risk and Industrial Facilities

HRF monitoring reports

Part III.A.9 – Construction Site Runoff

a. Site Planning and Non-structural & Structural Best Management Practices

A copy of the code/ordinance that requires the use and maintenance of appropriate structural and non-structural erosion, sedimentation, and waste controls during construction to reduce the discharge of pollutants to the MS4
Pre-construction Site Plan Review SOP

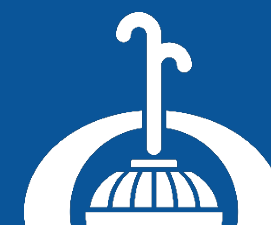
Site plan review tracking
Documentation of CGP notification and confirmation
Documentation of ERP notification and confirmation

b. Inspection and Enforcement

Construction Site Inspection SOP
Site inspection records <ul style="list-style-type: none"> A list and description of active construction sites reported Inspection reports, and any follow up activity where deficiencies were noted
Enforcement records

c. Site Operator Training

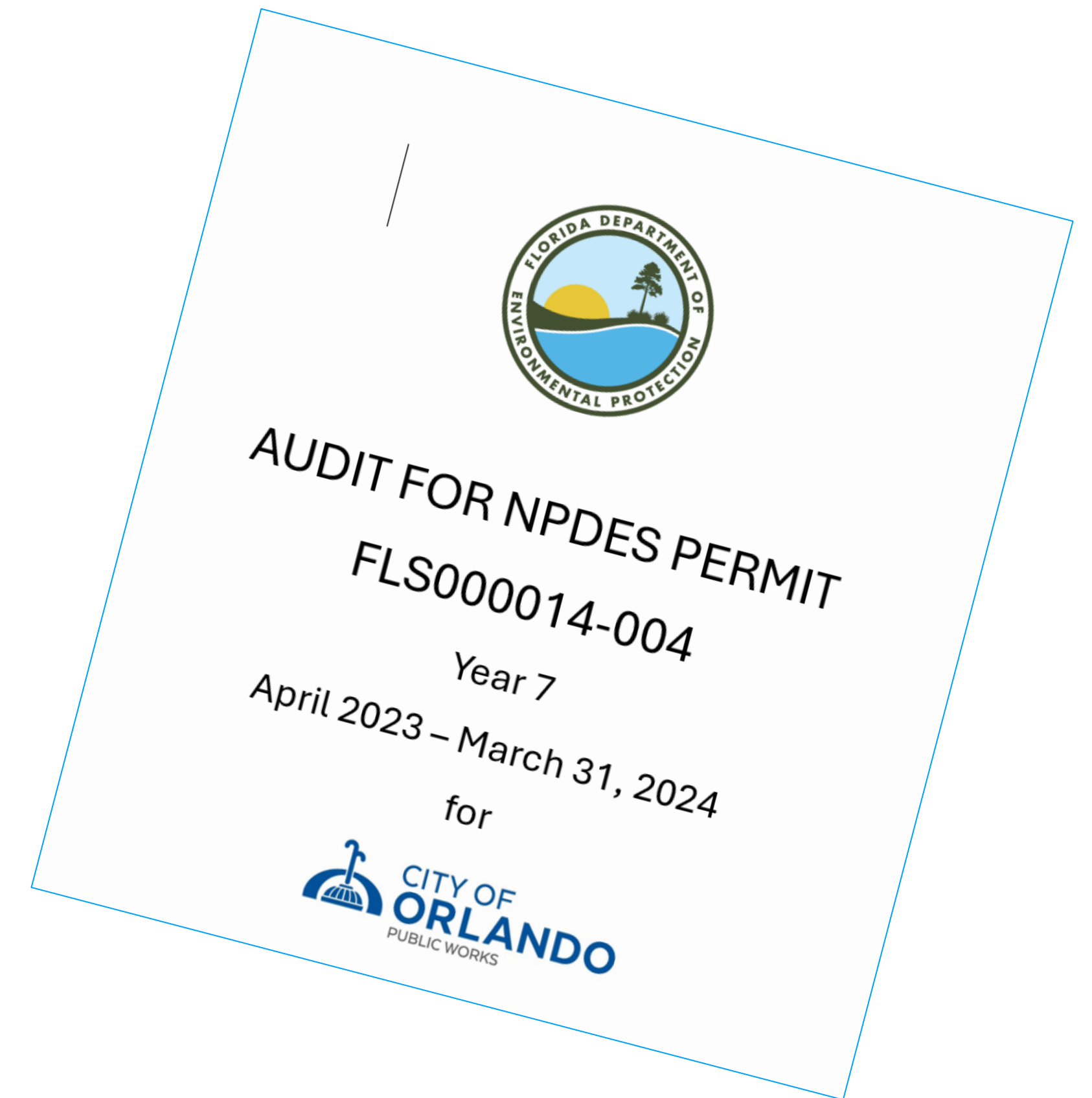
Site Operator Training SOP
Personnel training records <ul style="list-style-type: none"> Inspector DEP training Inspector annual training Site Plan Review annual training



Documentation Info

The City compiled a binder for the FDEP, Stormwater Division, and NPDES Coordinator that contained all of the documents submitted with tabs for each section.

This provided a reference guide for the FDEP and allowed the Stormwater lead and NPDES Coordinator to have a record of what was requested and submitted.



DEP Site Visits

Site visits are conducted for the purpose of Department staff to shadow permittee staff on inspections. A list of elements reviewed during site visits may include:

- Part III.A.1: Structural Controls and Stormwater Collection Systems Operation
- Part III.A.3/5: Permittee vehicle maintenance and equipment or waste storage yards
- Part III.A.4: Stormwater projects (under construction / completed and Capital Improvement Plan (CIP) / flood control)
- Part III.A.9: Permittee- or privately- operated active construction sites

Site visits will consist of:

- Brief discussion of desktop audit findings
- ~2-3 hour field review to include shadowing inspections of applicable construction/CIP sites, municipal facilities, and structural control inventory

Things to do BEFORE the FDEP Site Visit

1. Select a stormwater feature that has multiple controls to allow the FDEP to observe how a variety of maintenance activities are performed for your organization.
2. Visit the equipment and storage yards that are inspected under your permit.
 - Meet the person who does the inspections.
 - Ask them to describe their inspection process.
 - Will they be available for the Site Visit?
 - Does the yard meet the permit requirements?
 - Could the yard exceed the permit requirements?

More Things to do BEFORE the FDEP Site Visit

3. Visit the Stormwater and construction projects

- Will the Construction Inspector be onsite for the site visit?
- Are there any deficiencies?
- Are there any items that go above the requirements that can be pointed out?
- Have an example of a deficiency report handy to show them.

Site Visit Packages

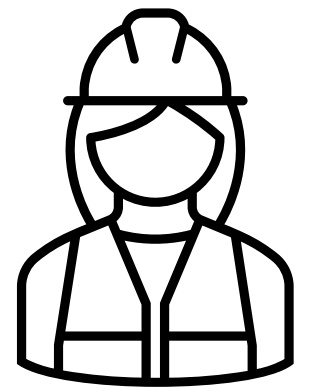
The City compiled packages for each site that included:

- Maps
- NOIs/Exemption Letter
- SWPPPs
- Infrastructure designs

We also discussed phasing for certain project, schedule for maintenance, mass grading versus phased development activities.

Safety Items

- Did you perform a vehicle inspection to ensure the vehicle is in proper operating order?
- Do all personnel have hard hats, safety vests, and steel toe boots for the construction zones?
- Is there ample water for the Team?
- Do you have sunglasses/safety glasses, sunscreen and/or bug spray?
- Are there umbrellas available?
- Is there lightning in the area? Do you have an app to accurately track to ensure safety for the Team?
- We went over the safety consideration for each site visit prior to entering the work zone.



We Made It Through The Audit, Now What?

After the audit we received a request for additional documentation. This was included in the email:

Audit Report

The Department will need to see follow up documentation of the following:

III.A.4: Verify with City Engineer if there is an updated stormwater master plan.

III.A.5: Fleet yard does have an MSGP. Please send a copy of the permit.

III.A.6: Reviewed roster for Parks (PHF) on site but need a roster and if the City has a contract with MMG and Ground Tek, the Department will need a copy of those.

III.A.7.:

1) Spill prevention and response - garbage truck hydraulic spills SOP.

2) Private contractors are used for other spills, please send the contract associated with this contractor.

3) Provide an example for an SSO/I&I incident clean up activity

III.A.8: provide HRF SOP (and inventory including facility outfall to the MS4 – if applicable)

III.A.9.a: Provide example records of:

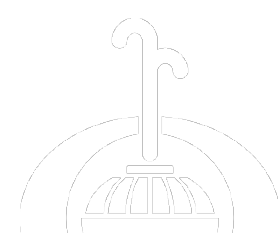
1 notification of a CGP/1 confirmation of a CGP

1 notification of an ERP/1 confirmation of an ERP

III.A.9.b.: Provide an example of an enforcement record.

Site Visit – Everbe, Summerlin, Spring Lake, and Spring Lake Drain Well

I did not observe any follow up needed at the sites.

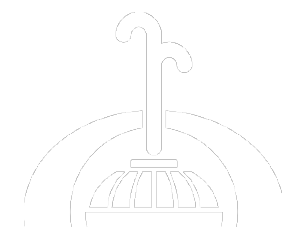


Additional Documentation Request

For the response, we were sent an FTP link to upload the documents.
We set the file folders up the same as the original request (by report section)

- III.A.4_completed
- III.A.5_InProgress
- III.A.6_InProgress
- III.A.7_InProgress
- III.A.8_Complete
- III.A.9.a_Complete
- III.A.9.b_Complete

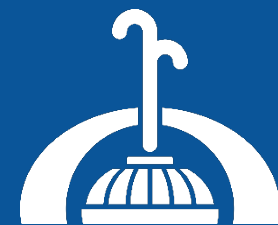
A couple items took some time to gather so the available information was submitted in advance of the deadline.
We discussed the longer turn around time items, and were able to put a placeholder in for these, which are shown at the end of the folder name.



Tips and Lessons Learned

- The original construction project selected only needed pavement so we selected a new site to allow the FDEP to observe construction and see the stormwater protection.
- The site visit packages allowed us to show the FDEP how the stormwater system was designed and connected to the final outfall.
- The stormwater inspection location allowed our Team to highlight the complexity of stormwater structures and how they are maintained.
- Even though they are not in our permit specifically, the City showcased one of our drainwells and discussed the cleaning/maintenance required to maintain the stormwater capacity of this system.

What do you have that you can showcase?



Questions
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Stormwater Assistant Division
Manager

