

# City of Arlington Phase I MS4 Program Overview

By: *Trenecia Williams*

October 27, 2021



# Program Overview

- The City of Arlington addresses industrial facility stormwater discharges to the MS4 through a comprehensive industrial program that includes:
  - Inspections
    - Annual (NOI's)
    - Biennial (NEC's)
  - Regular Screening
  - Monitoring

Stormwater Industrial Routine Facility Inspection Report

General Information

Facility Name	Start/End Time
Date of Inspection	
Inspector's Name(s)	
Inspector's Title(s)	
Inspector's Contact Information	
Inspector's Qualifications	

Weather

Weather at time of this inspection?

Clear  Cloudy  Rain  Sleet  Fog  Snow

Temperature: \_\_\_\_\_

Other: \_\_\_\_\_

Have any previously unidentified discharges of pollutants occurred since the last inspection? If yes, describe: \_\_\_\_\_

Were there any discharges occurring at the time of inspection?  Yes  No

If yes, describe: \_\_\_\_\_


Control Measures

Control of stormwater control measures identified in your SWPPP on your site. Carry a copy of the numbered site map.



# Facility Identification Process

- An industrial inventory of facilities is maintained electronically by the Environmental Management Division. The inventory is updated with electronic data from;
  - The TCEQ's Central Registry list of industrial facilities that have filed a Notice of Intent or No Exposure Certification.
  - The City of Arlington's Community Development and Planning departments certificates of occupancy.


Questions or Comments >>

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**Water Quality General Permits & Registration Search - Advanced Search**

Choose the Type of Authorization (required):

Choose the Status (required) of this Authorization:  OR Application:

Enter any other relevant information (optional):

Authorization or Application Time Frame:  (MM/DD/YYYY) to  (MM/DD/YYYY)

Permittee/Registrant Name:  (All or part of permittee name)

Site Name on Authorization:  (All or part of site name)

Street Name:  (All or part of street name)

City:  (All or part of city name)

County:  OR TCEQ Region:

SIC Code:

Segment Number:

(SIC code(s) must be valid 4-digit SIC code(s))

## Public Works CO Report

Date Range: 11/1/2017 - 11/30/2017

Business Name	Address	Use of the Building Space	Type of Work Performed
<b>GENERAL MOTORS</b>			
	2525 E ABRAM STREET	GM ASSEMBLYPLANT WASTE MANAGEMANT/ CHEMICAL STORAGE	Mix Flammable/Combustable Liquids
	2525 E ABRAM STREET	GM ASSEMBLYPLANT WASTE MANAGEMANT/ CHEMICAL STORAGE	Hazardous or Toxic Chemicals
	2525 E ABRAM STREET	GM ASSEMBLYPLANT WASTE MANAGEMANT/ CHEMICAL STORAGE	Manufacturing on the Premises
<b>MARTIN MARIETTA</b>			
	1522 MANSFIELD WEBB ROAD		Raw Materials Stored Outdoors
	1522 MANSFIELD WEBB ROAD		Manufacturing on the Premises
	1522 MANSFIELD WEBB ROAD		Liquid Wastes
<b>SMURFIT KAPPA PACKAGING SOLUTIONS TEXAS</b>			
	3801 AVENUE E EAST		Manufacturing on the Premises
<b>VAN BORTEL AIRCRAFT, INC</b>			
	4846 S COLLINS STREET		Mix Flammable/Combustable Liquids
	4846 S COLLINS STREET		Liquid Wastes
<b>WARNKE'S MACHINING COMPANY LLC</b>			


# Program Implementation

- Total 102 facilities currently
- 49 Notice of Intent (NOI) Facilities
- 63 No Exposure Facilities (NEC)
- NOI facilities are inspected annually w/ more frequent follow ups as necessary)
- NEC facilities are inspected biennially w/ more frequent follow-ups as necessary)



# Program Implementation

- All facilities are required to submit a copy of their NOI certificate or NEC.
- All facilities are required to complete and submit an Industrial Facility Assessment Form.
  - General Facility Information/Onsite Contact
  - Day to day activity
  - Exposed list of materials
  - Any additional permits
    - Wastewater
    - Air



City of Arlington, Texas  
Public Works & Transportation Department  
Stormwater Management – Environmental Compliance  
101 W. Abram Street, MS 01-0220, Arlington, TX 76010

INDUSTRIAL FACILITY ASSESSMENT FORM

COA RECEIVED DATE:

GENERAL INFORMATION				
Company Name:				
Physical Address:				
Mailing Address:				
Years at Present Location:				
Total Number of Employees:				
Number of Employees per Shift:	1 <sup>st</sup> :	2 <sup>nd</sup> :	3 <sup>rd</sup> :	
Days of operation (check all that apply):		<input type="checkbox"/> Monday	<input type="checkbox"/> Tuesday	<input type="checkbox"/> Wednesday
		<input type="checkbox"/> Friday	<input type="checkbox"/> Saturday	<input type="checkbox"/> Thursday
Hours of Operation:		am to pm	<input type="checkbox"/> 24 hour operation	
FACILITY CONTACT				
Name:			Title:	
Phone:	Ext.:	Fax:	Email:	
ALTERNATE FACILITY CONTACT				
Name:			Title:	
Phone:	Ext.:	Fax:	Email:	

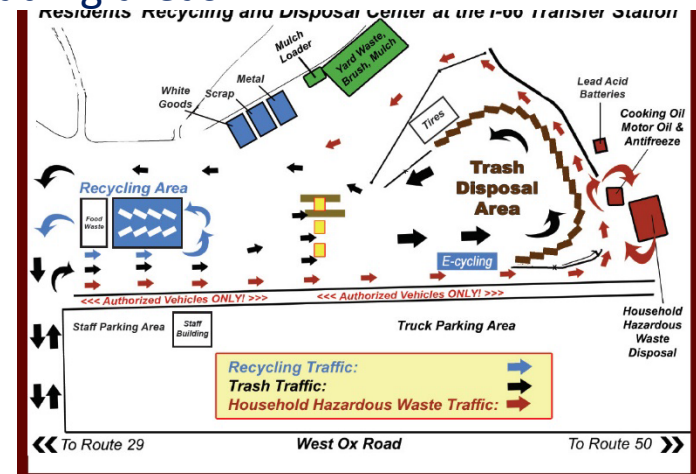
High Risk:  Yes  No

Expired  Pending

TCEQ RN#:

# Program Implementation

- All facilities are required to submit a site drainage map and a chemical inventory list. The site drainage map should detail the following:
  - The location of each permitted outfall.
  - An outline of the facility's drainage area.
  - Connections or discharges to MS4.
  - Locations of all receiving waters, including wetlands, and information as to whether they are impaired or have established TMDLs.
  - Vehicle and equipment maintenance areas.
  - Physical features of the site that may influence stormwater runoff or contribute a dry weather flow.
  - Processing, storage and material loading/unloading areas.
  - The site map must also clearly show the flow of stormwater runoff from each of these locations so that the final outfall(s) were the discharge leave is apparent.
  - Covered chemical storage areas



# Inspection Process

## Pre-Inspection (Research)

- Verify facility info
  - Via TCEQ Database
- Review facility permits
- Facility compliance history
- Virtual Maps of site



## Schedule Inspection

- Inspections are scheduled one month out.
- Facilities are either on an annual or biennial inspection schedule.
- Inspections are set via email



# Inspection Process (Cont.)

## Site Inspection



- *Document Review*
- *NOI, NEC, NOC, NOT*
- *SWP3*
- *Non-Storm Water Discharge*
- *Annual Site Comprehensive Report*
- *DMR or Annual Metals Waiver*
- *Benchmark Monitoring Data*
- *Quarterly Inspection/ Visuals Monitoring*
- *Rain Gauge Data Log*
- *Spills List*
- *Employee Training Records*
- *Structural Maintenance Records*
  - *Manifest*

- *Facility Walk-Thru*
- *Loading/Unloading Areas*
- *Waste Storage Areas*
- *Outdoor Storage Areas*
- *Chemical/Drum Storage Areas*
- *Indoor/Outdoor Process Areas*
- *Dust/Particulate Generating Process*
- *Potential Illicit Non-Storm Discharge Areas*
- *Vehicle Staging Areas*
- *Equipment Maintenance Areas*
- *Facility Sampling Points/Outfalls*



# Inspection Process (cont.)

## Closing Conference

- Conducted @ facility with site representative
- Review inspection and any non-compliances
- Inspection Sign-off (COA)



## Final Review

- Conducted at the office
- Notify Facilities via email.
  - Copy of inspection report
  - Corrective Actions/Plans



## Compliance Timeframe

- Facilities are given 30 days or less to comply depending on severity of violation.

# Additional Program Components

- Unscheduled inspections occur if an industrial facility is unresponsive, or an illicit discharge is reported or suspected.
- Facilities that are **required** by their TPDES industrial stormwater permit to conduct benchmark monitoring are required to submit the results to COA annually for review.
  - Facilities with benchmark exceedances are placed on an Action Plan.
    - Requires formal review of SWP3 and current BMP's
    - Facility corrective actions
- Facilities are required to submit copies of Discharge Monitoring Reports (DMR) annually by March 31<sup>st</sup> .
- Permittees that qualify for a waiver from hazardous metals monitoring must also submit a copy of the waiver each permit term to COA.

# Benchmark Exceedance-Action Plan



CITY OF ARLINGTON  
INDUSTRIAL PERMIT- MSGP  
ACTION PLAN- MONITORING EXCEEDANCE

Instructions: Fill out this form if storm-water sampling results show an exceedance of any statewide sector specific benchmark(s) or Numeric Effluent Limitation Exceedance.

**NOTE: FACILITY HAS 30 DAYS FROM DATE OF ISSUANCE TO SUBMIT A COMPLETED COPY OF THIS FORM ALONG WITH ANY REQUIRED ADDITIONAL DOCUMENTATION.**

Facility Name: \_\_\_\_\_ Address of Facility: \_\_\_\_\_

Sector: \_\_\_\_\_ SIC Code(s): \_\_\_\_\_

MSGP Permit Number: \_\_\_\_\_ E-mail Address: \_\_\_\_\_

Authorized Representative: \_\_\_\_\_ Date Form Prepared: \_\_\_\_\_

Form is being filled out in response to:

Benchmark Exceedance (sector specific)       Numeric Effluent Limitation Exceedance

**NOTES:**

- 1) Refer to Part IV, Section A, Pages 86-87 for "USE OF BENCHMARK DATA" and requirements.
- 2) Attach copies of all Laboratory analysis reports, including Chain of Custody forms.
- 3) IF Benchmark sampling **DID NOT** occur, attach rain log documentation to justify as to why samples were not taken.

List each parameter and Industry analysis results (exceedance):

Describe the result(s) of the investigation of the elevated benchmark levels:



CITY OF ARLINGTON  
INDUSTRIAL PERMIT- MSGP  
ACTION PLAN- MONITORING EXCEEDANCE

Describe the corrective action(s) you will take to address the benchmark exceedance(s):

➤ Date corrective action(s) completed or expected to be completed: \_\_\_\_\_

Are SWP3 revisions necessary?     Yes     No

**ATTACH THE REVISED PAGES FROM YOUR SWPPP, INCLUDING A SCHEDULE FOR IMPLEMENTING THE ADDITIONAL BMP/ CONTROL MEASURES.**

**CERTIFICATION**

I certify under penalty of the law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines for knowing violations.

\_\_\_\_\_  
Authorized Representative

\_\_\_\_\_  
Date

# MS4 Front Permit Software

- The City of Arlington utilizes the **MS4 Front Permit software** to maintain and record all compliance inspections and data associated with environmental compliance issues.

The screenshot displays the MS4 Front Permit Software interface. The top navigation bar includes the user name 'Welcome - Trenecia Williams' and the 'MS4Front' logo. A left sidebar lists various modules such as 'Automotive Related Business', 'City Projects', and 'Industrial Stormwater Management'. The main content area is titled 'Industrial Stormwater Management - Assets' and includes a 'Filters' section, a 'Create New Record' button, and a table of asset records. The table has columns for Asset ID, Facility Name, High Risk, Next Inspection Date, Permit Status, and Permit Type. Each row includes a checkbox and three icons (edit, location, and document) for record management.

<input type="checkbox"/>	Asset ID	Facility Name	High Risk	Next Inspection Date	Permit Status	Permit Type
<input type="checkbox"/>	I-000130	WOODY BUTTS, INC.	Yes	-	ACTIVE	NEC
<input type="checkbox"/>	I-000129	WINSYSTEMS INC.	No	-	ACTIVE	NEC
<input type="checkbox"/>	I-000128	WT GRINDING & SUPPLY INC.	No	-	ACTIVE	NEC
<input type="checkbox"/>	I-000127	UNITED STATES POSTAL SERVICE	No	-	ACTIVE	NEC
<input type="checkbox"/>	I-000125	TSI (TEXAS SADDLEBAGS, INC.)	No	06/09/2021	ACTIVE	NEC
<input type="checkbox"/>	I-000124	TSA PROCESSING DALLAS, LLC.	No	-	ACTIVE	NEC
<input type="checkbox"/>	I-000123	TRANSNORM SYSTEM, INC.	Yes	-	ACTIVE	NEC
<input type="checkbox"/>	I-000121	THE SHERWIN-WILLIAMS COMPANY- ARLINGTON PLANT	No	-	ACTIVE	NEC
<input type="checkbox"/>	I-000120	TEXAS STONE DESIGNS, INC.	No	-	ACTIVE	NEC
<input type="checkbox"/>	I-000119	TEXAS ALMET, INC.	Yes	-	ACTIVE	NEC
<input type="checkbox"/>	I-000118	SYSTEMS INTEGRATION, INC.	No	-	ACTIVE	NEC

# Sample Inspection Report



**City of Arlington**

101 W. Abram Street MS 01-0220  
Arlington, TX 76010  
P: 817-459-6550, F: 817-459-6585

**NEC Inspection**

Performed By: Chauncey Plummer Inspected On: 10/21/2021  
Asset ID: I-000106 Asset Status: Active  
RFID Number: NEC-106 Address: 624 107th St.

Industrial Activities Performed On-site: Manufacture honeycomb products for aviation industry.

Asset ID - I-000106

FACILITY INFORMATION	
1 File Status:	Complete
2 TCEQ Customer Number	602918013
3 TCEQ Regulated Number	104768049
4 Permit Type:	NEC
5 Primary Permit #:	TXRNEAC10
6 Permit Status	ACTIVE
7 Permit Expiration Date	08/14/2021
8 Primary SIC:	3499
9 Sector	AA
10 Benchmark Sampling	N/A
11 Benchmark Parameters	N/A
12 High Risk	Yes
FACILITY BACKGROUND	
13 Facility Representative:	Rodger McCurdy
14 Description of Industrial Activities Performed Onsite	Manufacture honeycomb products for aviation industry.
15 Materials Stored Outdoors and Industrial Activities Exposed to Storm Water:	Pass
16 Describe all USTs present onsite (NOTE: Chemical, Size and Location)	None
17 Describe all ASTs present onsite (NOTE: Chemical, size and Location)	55 gal drums acetone and isopropyl alcohol 4 250 gal totes of used oil.
18 Are USTs/ASTs registered with TCEQ?	N/A
19 Describe all structural control devices onsite and current maintenance programs:	Secondary containment
20 List any reportable spills within the past year:	None
ADDITIONAL STATE AND/OR CITY PERMITS	
21 Additional NPDES/TPDES Permit(s):	None
22 Details:	None
23 City of Arlington Permit(s):	TXRNEAC10

ID Number: I-000106  
Location: 624 107th St.

28 Air Permit	No
29 EPA No:	
30 TCEQ No:	
GOOD HOUSEKEEPING AND BMPs- EXTERIOR	
31 Are materials stored outdoors and industrial activities exposed to stormwater?	No
32 Are vehicle staging areas free from heavy staining of leaking vehicles or equipment?	Yes
33 Is exterior equipment and materials stored in designated areas?	Yes
34 Are chemical containers stored in designated areas and are in good condition, properly labeled and closed (if not currently in use)?	Yes
35 Are ASTs in good condition with no evidence of cracks or leakage?	Yes
36 Are vehicle fueling areas in good condition with no evidence of recent staining/spills?	Yes
37 Are Stormwater structural controls (storm inlets, swales and/or trench drains) free from excessive amounts of sediment build-up?	Yes
38 Are BMP controls adequate for all erodible and construction areas effectively preventing erosion and excessive sediment build-up and discharge?	Yes
39 Is activity causing dust to generate? Is there vehicle tracking occurring offsite?	No
40 Is spill response equipment adequate and accessible to all chemical storage areas?	Yes
41 Are shop floors clean and free from residue and contaminated absorbent material?	Yes
42 Are chemical containers inside maintenance and storage areas in good condition, properly labeled and closed (if not in use)?	Yes
43 Are secondary containment structures (spill pallets) empty and in good condition?	Yes
44 Is spill response equipment adequate and accessible to all chemical storage areas?	Yes
Inspection Result and Acknowledgement	
45 Inspection Result	Pass

ID Number: I-000106  
Location: 624 107th St.

Facility Representative's Signature:  
49

Inspection Comments and Corrective Actions



5FC2AA47-329C-426E-9FC4-13FE783CE305.jpeg



C04FE304-FE40-4A84-AF97-94607AAFDB90.jpeg

# Industrial Risk Scoring System

- Established to rank a facility's potential to pollute and impact stormwater based off compliance and non-compliance within the following categories:
  - **MSGP Permit Status**
    - NEC/NOI
  - **Standard Industrial Classification (SIC)**
    - EPCRA Section 313 List
      - Does facility maintain, manufacture, store, process or use any chemicals.
    - Proper material storage of chemicals
      - Labels and storage in designated areas
    - Proper BMPs in place to prevent discharge and runoff from any chemical/materials exposed to stormwater runoff.
      - Are spill kits visible and accessible?
  - **Water Quality Monitoring**
    - Are there any exceedances of parameters?
  - **Record Keeping & Documentation**
    - Are SWP3 records current and maintained onsite ?
  - **Proximity to an Impaired Water Body**
    - As identified on latest CWA Section 303 (d) List
- **Scoring Scale Range from 1-5**
  - 1= High
  - 5= Low

# Industrial Facility Risk Matrix

	B	C	D	E
1	<b>INDUSTRIAL FACILITY WEIGHTED RISK MATRIX</b>			
2	<b>CRITERIA</b>	<b>WEIGHT</b>	<b>SCALE</b>	<b>Scale Specification</b>
3		(NOTE: 1 is the lower end of risk and 5 is the higher end)		
4				
5	Is Facility's SIC Code listed on the EPCRA Section 313 List.	1/5	1= <b>Low (VL)</b> 5= <b>Very High (VH)</b>	1 = Facility's SIC Code is <b>NOT</b> listed on the EPCRA Section 313 List ( <b>VL</b> ) 5 = Facility's SIC Code <b>IS</b> listed on the EPCRA Section 313 List ( <b>VH</b> )
6	Facility maintains, manufactures, stores, processes or uses any EPCRA Section 313 chemicals onsite.	1-5	1 = <b>Very Low (VL)</b> 2 = <b>Low (L)</b> 3 = <b>Medium (M)</b> 4 = <b>High (H)</b> 5 = <b>Very High (VH)</b>	1 = No EPCRA Section 313 Chemicals Onsite ( <b>VL</b> ) 2 = < 5 EPCRA Section 313 Chemicals Onsite ( <b>L</b> ) 3 = < 10 EPCRA Section 313 Chemicals Onsite ( <b>M</b> ) 4 = < 15 EPCRA Section 313 Chemicals Onsite ( <b>H</b> ) 5 = > 16 EPCRA Section 313 Chemicals Onsite ( <b>VH</b> )
7	Chemical containers and hazardous waste materials are properly labeled and stored in designated areas.	1-5	1= <b>Very Low (VL)</b> 2 = <b>Low (L)</b> 3 = <b>Medium (M)</b> 4 = <b>High (H)</b> 5 = <b>Very High (VH)</b>	1 = No chemical containers or hazardous waste materials stored onsite ( <b>VL</b> ) 2 = All Chemical containers and hazardous waste materials stored onsite are labeled and stored properly ( <b>L</b> ) 3 = Some chemical containers and/or hazardous waste are not properly stored and/or labeled ( <b>M</b> ) 4 = Most chemical containers and/or hazardous waste not properly stored and/or labeled ( <b>H</b> ) 5 = All chemicals containers and/or hazardous waste not properly stored and/or labeled ( <b>VH</b> )
8	Facility is required to implement and maintain a SWP3 onsite.	1/5	1= <b>Very Low (VL)</b> 5= <b>Very High (VH)</b>	1 = Facility is <b>NOT</b> required to implement and maintain a SWP3 onsite ( <b>VL</b> ) 5 = Facility <b>IS</b> required to implement and maintain a SWP3 onsite ( <b>VH</b> )
9	Facility maintains an updated onsite spills and leaks list, documenting all reportable quantity spills	1/5	1= <b>Very Low (VL)</b> 5 = <b>Very High (VH)</b>	1= Facility is <b>NOT</b> required to implement and maintain a SWP3 onsite ( <b>VL</b> ) 5= Facility <b>IS</b> required to implement and maintain a SWP3 onsite ( <b>VH</b> )
10	Facility had a significant spill to occur in the past 3 years in an area exposed to stormwater.	1-5	1= <b>Very Low (VL)</b> 2 = <b>Low (L)</b> 3 = <b>Medium (M)</b> 4 = <b>High (H)</b> 5 = <b>Very High (VH)</b>	1= Facility has <b>NOT</b> had a significant spill to occur in the past 3 years ( <b>VL</b> ) 2 = Facility had a <b>MINOR</b> spill to occur in the past 3 years but spill was contained onsite and did not impact offsite ( <b>L</b> ) 3= Facility had a <b>MINOR</b> spill to occur in the past 3 years but spill was not contained onsite and impact offsite ( <b>M</b> ) 4 = Facility had a <b>MAJOR</b> spill to occur onsite in the past 3 years, but spill was contained onsite and did not impact offsite ( <b>H</b> ) 5 = Facility had a <b>MAJOR</b> spill to occur onsite in the past 3years, and spill was <b>NOT</b> contained and impacted offsite ( <b>VH</b> )

# Good Inspection Photos





# Good Inspection Photos



# Good Inspection Photos



# Good Inspection Photos



# Bad Inspection Photos



# Bad Inspection Photos



# Bad Inspection Photos



# QUESTIONS?



For additional questions or guidance, feel free to contact me directly:

**Trenecia Williams**

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