The City of Arlington addresses industrial facility stormwater discharges to the MS4 through a comprehensive industrial program that includes:

- Inspections
- Regular Screening
- Monitoring
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.
Program Implementation

- Total 97 facilities currently
- 43 Notice of Intent (NOI) Facilities
- 54 No Exposure Facilities (NEC)
- NOI facilities are inspected annually with more frequent follow-ups as necessary
- NEC facilities are inspected biennially with more frequent follow-ups as necessary
- 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
  - Day to day activity
  - Exposed list of materials
  - Any additional permits
- All facilities are required to submit a site map and chemical inventory list
Inspection Process

Pre-Inspection
- Verify facility info
- Review facility permits
- Facility compliance history

Schedule Inspection
- Inspections are scheduled one month out
- Facilities are either on an annual or biennial inspection schedule
- Inspections are set via email at the beginning of each month.
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 representative
- Review inspection and any non-compliances
- Inspection Sign-off (COA)

**Final Review**
- Conducted at the office
- Notify Facilities
  - Copy of inspection report
  - Corrective Actions/Plans
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\textsuperscript{st}.
- Permittees that qualify for a waiver from hazardous metals monitoring must also submit a copy of the waiver each permit term to COA.
INSTRUCTIONS: Fill out this form if storm-water sampling results show an exceedance of any state-wide sector specific benchmark(s) or Numeric Effluent Limitation Exceedance.

NOTICE: 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, attachrain 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:

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 SWPS 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 __________________________
Compliance Software

- The City of Arlington utilizes the eCompliance Field ID software to maintain and record all compliance inspections and data associated with environmental compliance issues.
### Sample Inspection Report

#### Table 1: Sample Inspection Details

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Additional NPDES/TPDES Permit</td>
<td>No</td>
</tr>
<tr>
<td>Details</td>
<td></td>
</tr>
<tr>
<td>City of Aggregate Permit</td>
<td>No</td>
</tr>
<tr>
<td>Details</td>
<td></td>
</tr>
<tr>
<td>Waste Generator Status</td>
<td></td>
</tr>
<tr>
<td>NPDES</td>
<td>No</td>
</tr>
<tr>
<td>TCEQ No</td>
<td></td>
</tr>
<tr>
<td>Site</td>
<td>No</td>
</tr>
<tr>
<td>Generator Information</td>
<td></td>
</tr>
</tbody>
</table>

#### Section A: Good Housekeeping and BMPS - Exterior Areas

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material handling and storage areas</td>
<td>Yes</td>
</tr>
<tr>
<td>Vehicle staging areas free from heavy walking of leaking vehicles or equipment</td>
<td>Yes</td>
</tr>
<tr>
<td>Exterior equipment and materials stored in designated areas</td>
<td>Yes</td>
</tr>
<tr>
<td>Chemical containers are stored in designated areas and are in good condition, properly labeled, and closed (if not currently in use)</td>
<td>No</td>
</tr>
<tr>
<td>Adequate in good condition with no evidence of leaks or spillage</td>
<td></td>
</tr>
<tr>
<td>Vehicle fueling areas in good condition with no evidence of recent discharge</td>
<td>No</td>
</tr>
<tr>
<td>Storm water structural controls (storm inlet, inlet, catch basin) free from excessive amounts of sediment build-up and drainage</td>
<td></td>
</tr>
<tr>
<td>BMP controls adequate for all confined and construction areas effectively preventing erosion and excessive sediment build-up</td>
<td>No</td>
</tr>
<tr>
<td>Secondary containment structures (spill pallets)</td>
<td></td>
</tr>
<tr>
<td>Spill response equipment adequate and accessible to all chemical storage areas</td>
<td>Yes</td>
</tr>
</tbody>
</table>

#### Section B: Good Housekeeping and BMPS - Interior Areas

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Storage areas &amp; equipment</td>
<td></td>
</tr>
<tr>
<td>Spill floors are clean and free from residue and contaminated absorbent material</td>
<td>Yes</td>
</tr>
<tr>
<td>Secondary containment structures (spill pallets)</td>
<td>Yes</td>
</tr>
<tr>
<td>Spill response equipment adequate and accessible</td>
<td>Yes</td>
</tr>
</tbody>
</table>

#### Section D: SWP3 and Recordkeeping

<table>
<thead>
<tr>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOI complete and submitted to TCEQ</td>
<td>Yes</td>
</tr>
<tr>
<td>SWP3 onsite or readily accessible</td>
<td>Yes</td>
</tr>
<tr>
<td>SWP3 signed by authorized signatory</td>
<td>Yes</td>
</tr>
<tr>
<td>Facility site plan up to date</td>
<td>Yes</td>
</tr>
<tr>
<td>Inventory of exposed materials accurately updated</td>
<td>Yes</td>
</tr>
<tr>
<td>Spills list accurately updated to include spills for past 3 years</td>
<td>Yes</td>
</tr>
<tr>
<td>Storm water pollution prevention team established and identifies the responsibilities of each team member</td>
<td>Yes</td>
</tr>
<tr>
<td>SWP3 identifies actual and potential sources of pollution from onsite activities</td>
<td>Yes</td>
</tr>
<tr>
<td>SWP3 establishes practices and necessary controls to reduce pollution in storm water discharges</td>
<td>Yes</td>
</tr>
<tr>
<td>Quarterly inspections conducted and appropriately filed</td>
<td>Yes</td>
</tr>
<tr>
<td>Quarterly visual monitoring storm water reports completed and filed</td>
<td>Yes</td>
</tr>
<tr>
<td>Employee training program (should encompass proper housekeeping and BMP, spill prevention and response procedures)</td>
<td>Yes</td>
</tr>
<tr>
<td>Records of employee training maintained onsite</td>
<td>Yes</td>
</tr>
<tr>
<td>Has annual DMR been completed?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

* * Observations recorded. See Deficiency/Recommendation Report.
Sample Inspection Report
Sample Inspection-N01
Good Inspection Photos
Good Inspection Photos
Good Inspection Photos
Good Inspection Photos
Bad Inspection Photos
QUESTIONS?