

# City of Arlington Phase I MS4 Program Overview

By: Trenecia Williams

April 6, 2018



# Program Overview

- The City of Arlington addresses industrial facility stormwater discharges to the MS4 through a comprehensive industrial program that includes:
  - Inspections
  - Regular Screening
  - Monitoring

Stormwater Industrial Discharge 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: \_\_\_\_\_

Have any previously unidentified discharges of pollutants occurred at the facility?  
Yes, describe: \_\_\_\_\_  
No

Are there any discharges occurring at the time of inspection?  Yes  No  
Yes, describe: \_\_\_\_\_

Control Measures



# 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.

**Texas Commission on Environmental Quality** | [Search by County](#)

[Home Search](#) | [US State](#) | [TCEQ Home](#)

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

Choose the Type of Authorization (required):  Approval/Permit/Condition Registration  Registration

Choose the Status (required) of this Authorization:  Active  Closed  Expired  On Application

OR Application:  Pre-application  Application  Certificate

Enter any other relevant information (optional):

Authorization or Application Time Frame:  (start) to  (end)

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

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

Street Name:  (OR or part of street name)

City:  (OR or part of city name)

County:  OR TCEQ Region:

SEC Code:

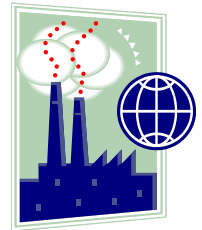
Segment Number:

**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>CHEMICAL FACTORY</b>			
	2521 E ARRAM STREET	(ON ASSEMBLY) WASTE MANAGEMENT / CHEMICAL STORAGE	Waste Flammable/Combustible Liquids
	2521 E ARRAM STREET	(ON ASSEMBLY) WASTE MANAGEMENT / CHEMICAL STORAGE	Household or Toxic Chemicals
	2521 E ARRAM STREET	(ON ASSEMBLY) WASTE MANAGEMENT / CHEMICAL STORAGE	Manufacturing on the Premises
<b>ENVIRONMENTAL</b>			
	1522 MANFIELD WEBB ROAD		Non-Hazardous Solid/Outdoor
	1522 MANFIELD WEBB ROAD		Manufacturing on the Premises
	1522 MANFIELD WEBB ROAD		Liquid Wastes
<b>GRANITE KAPPA PACKAGING SOLUTIONS TEXAS</b>			
	3801 ASTOR E EAST		Manufacturing on the Premises
<b>UPH NORTH, ARLCOAT, INC.</b>			
	4015 COLLINS STREET		Waste Flammable/Combustible Liquids
	4015 COLLINS STREET		Liquid Wastes
<b>HANSON'S MACHINING COMPANY LTD.</b>			

# Program Implementation

- Total 97 facilities currently
- 43 Notice of Intent (NOI) Facilities
- 54 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)
- 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.



# 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 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<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**

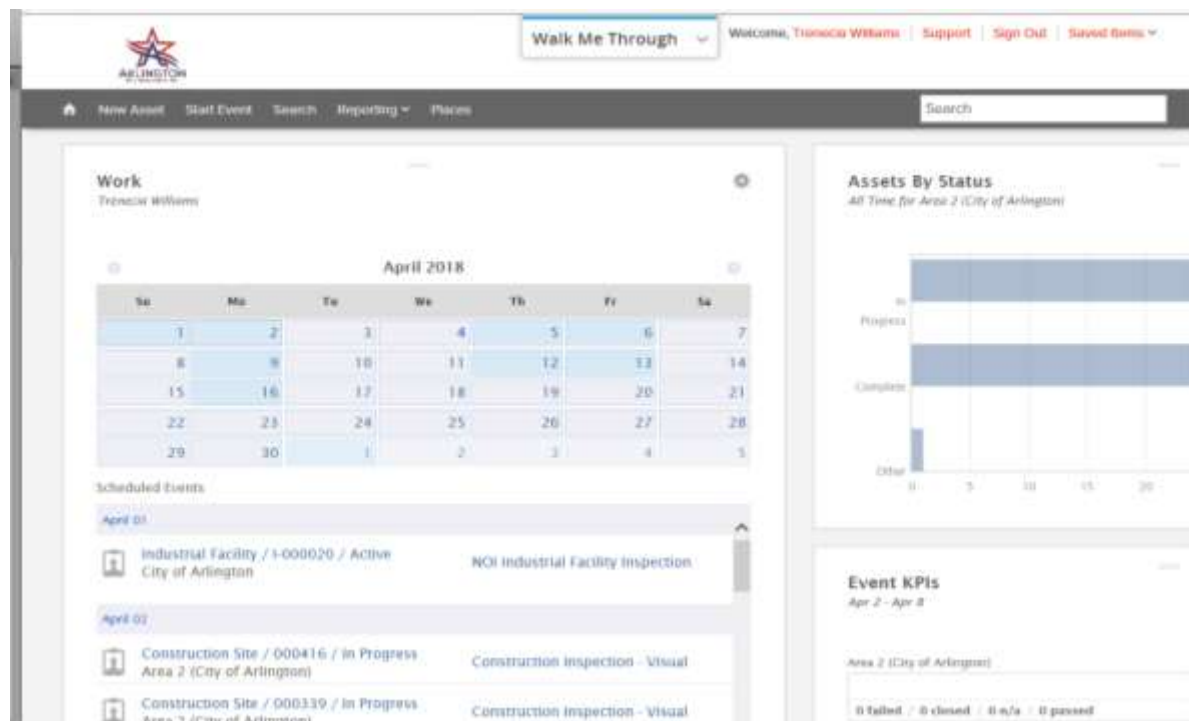
I certify under penalty of the law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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

# 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



**City of Arlington**  
 101 W. Abram Street MS 01-0220  
 Arlington, TX 76010  
 P: 817-469-6550, F: 817-469-6568

## Industrial Facility Inspection Report

Page: 1 of 5

**Performed By:** Trenea Williams      **Inspected On:** 08/29/17 9:00 AM CDT  
**ID Number:** I-000051      **Owner:** \_\_\_\_\_  
**Reference #:** OIL STATES INDUSTRIES INC. -      **Address:** \_\_\_\_\_  
**Total Score:** \_\_\_\_\_      **Location/Desc:** 1111 Commercial Blvd North

**Industrial Facility - I-000051**

Date Received:	<u>08/30/2014</u>
File Status:	<u>Complete</u>
TCEQ Customer Number:	<u>600066004</u>
TCEQ Regulated Entity:	<u>033872485</u>
Permit Type:	<u>NOI</u>
Primary Permit #:	<u>TxR004827</u>
Other Permit #:	<u>N/A</u>
Permit Status:	<u>ACTIVE</u>
Permit Expiration:	<u>08/14/2016</u>

Benchmark Parameters: N/A  
 High Risk: Yes

#	Description	Status
<b>A. GENERAL INFORMATION</b>		
1	Weather	Clear
<b>B. FACILITY BACKGROUND</b>		
2	SIC CODE	3544
3	NAICS CODE	
4	1. TPDES Permit Applicability (check one)	NOI
5	2. SWP3 Status, applicable for only regulated facilities (check one)	Individual
6	3. Description of Industrial Activities Performed Onsite (Sector Classification)	Yes
7	Materials Stored Outdoors and Industrial Activities Exposed to Storm water:	Pass
8	5. Describe all USTs present onsite (note chemical, size and location):	None
9	6. Describe all ASTs present onsite (note chemical, size, and location):	
10	7. Are USTs/ASTs Registered with TCEQ	No
11	9. Describe all structural control devices onsite and current maintenance program (view records):	None
12	10. List any reportable spills within the past year:	None
<b>C. ADDITIONAL STATE AND/OR CITY PERMIT(S):</b>		

\* = Observations recorded, See Deficiency/Recommendation Report.  
 Customer is ultimately responsible for safety and safe use.

Printed Date: August 30, 2017 11:01 PM

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**Page:** 2 of 5      **ID Number:** I-000051  
**Location/Desc:** 1111 Commercial Blvd North

# Sample Inspection Report

#	Description	Status
13	11 Addressed NPDES/STPDES Permit (s)	No
14	12 Details	
15	13 City of Adoption Permit (s)	No
16	14 Details	
17	15 Waste Generator Status	
18	16 EPA No	
19	17 TCEQ No	
20	18 Air Permit	No
21	19 EPA No	
22	20 TCEQ No	
<b>B. GOOD HOUSEKEEPING AND BMPs - Exterior Areas</b>		
23	21 Material loading/unloading storage areas	Yes
24	22 Vehicle staging areas free from heavy staining of leaking vehicles or equipment	Yes
25	23 Exterior equipment and materials stored in designated areas	Yes
26	24 Chemical containers are stored in designated areas and are in good condition, properly labeled, and closed (if not currently used)	Yes
27	25 AITs in good condition with no evidence of cracks or leakage	NA
28	26 Vehicle leaking areas in good condition with no evidence of recent staining/drip?	Yes
29	27 Storm water SPILLAGE controls (Storm Water Swales, Trunks, Ditches) free from excessive amounts of sediment (sand, silt, debris, trash, or other pollutants)	Yes
30	28 Are BMP controls adequate for all erodible and construction areas effectively preventing erosion and excessive sediment build-up and discharge?	Yes
31	29 Is actively leaking fuel to generator? Is there vehicle tracking occurring onsite?	No
32	30 Spill response equipment adequate and accessible to all chemical storage areas	Yes
<b>D. GOOD HOUSEKEEPING AND BMPs - Interior Areas</b>		
33	31 Shop floors are clean and free from residue and contaminated absorbent material	Yes
34	32 Chemical containers inside maintenance and storage areas are in good condition, properly labeled, and closed (if not in use)	Yes

35	33 Spill response equipment adequate and accessible to all chemical storage areas	Yes
<b>D. GOOD HOUSEKEEPING AND BMPs - Interior Areas</b>		
33	27 Shop floors are clean and free from residue and contaminated absorbent material	Yes
34	28 Chemical containers inside maintenance and storage areas are in good condition, properly labeled, and closed (if not in use)	Yes
35	29 Secondary containment structures (spill pallets) empty and in good condition	Yes
36	30 Spill response equipment is adequate and accessible	Yes
<b>E. SWP3 and RECORDKEEPING</b>		
37	31 NOI complete and submitted to TCEQ (note N/A for TPDES extension)	Yes
38	32 SWP3 onsite or readily accessible	Yes
39	33 SWP3 signed by authorized signatory	Yes*
40	34 Facility site plan up to date	Yes
41	35 Inventory of exposed materials accurately updated	Yes
42	36 Spills list accurately updated to include spills for past 3 years	Yes
43	37 Storm water Pollution Prevention Team established and identifies the responsibilities of each team member	Yes
44	38 SWP3 identifies actual and potential sources of pollution from onsite activities	Yes
45	39 SWP3 establishes practices and necessary controls to reduce pollution in storm water discharges	Yes
46	40 Quarterly inspections conducted and appropriately filed	Yes*
47	41 Quarterly visual monitoring storm water reports completed and filed	Yes*
48	42 Employee training program (should encompass proper housekeeping and BMP, spill prevention and response procedures)	Yes
49	43 Records of employee training maintained onsite	Yes*
50	44 Has annual DMR been completed?	Yes

\* = Observations recorded. See Deficiency/Recommendation Report.

Customer is ultimately responsible for safety and safe use.

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# Sample Inspection Report

Page: 3 of 5

ID Number: 1-000051  
 Location/Desc: 1111 Commercial Blvd North

#	Description	Status
51	Are there facility logs or records available and up?	Yes
52	COA Inspector Signature	
53	Has facility completed annual benchmark monitoring requirements?	No

### Deficiency/Recommendation Report

Date: 08/29/17 9:00 AM CDT    Owner: City of Arlington    ID #: 1-000051  
 D = Deficiency / R = Recommendation

#	D/R	Explanation
36	R	Updated and signed 1-30-2017
46	R	Completed for 2016 and signed for 2017
47	R	Completed for 2016 and signed for 2017
48	R	Completed 1-7-2016
51	R	Water submitted for 2017




\*\* Observations recorded. See Deficiency/Recommendation Report.  
 Customer is ultimately responsible for safety and well-being.

Printed Date: August 30, 2017 11:51 PM

Page: 5 of 5    ID Number: 1-000051  
 Location/Desc: 1111 Commercial Blvd North

# Sample Inspection-NOI

Page: 5 of 5

ID Number: 4-000051

Location/Desc: 1111 Commercial Blvd North



Non-Stormwater Assessment completed: 1-30-2017  
Annual CSCE completed: 12-7-2016  
Rain gauge data completed for 2016 and current for 2017

Performed by:

  
Trenecia Williams

Printed Date: August 30, 2017 11:01 PM

Customer is ultimately responsible for safety and safe use.

# Good Inspection Photos



# Good Inspection Photos





# Good Inspection Photos



# Good Inspection Photos



# Bad Inspection Photos



# Bad Inspection Photos



# Bad Inspection Photos



**QUESTIONS?**