THE REQUIREMENTS
YOUR SWMP
TCEQ SWMP REQUIREMENTS FOR PHASE II COMMUNITIES

6. Industrial Stormwater Sources

(a) Permittees operating a level 4 small MS4 shall include the requirements described below in Part III. B.6.(1) – this requirement is only applicable to level 4 MS4s

I. Permittees who operate level 4 small MS4s shall identify and control pollutants in stormwater discharges to the small MS4 from permittee’s landfills; other treatment, storage, or disposal facilities for municipal waste (for example, transfer stations and incinerators); hazardous waste treatment, storage, disposal and recovery facilities and facilities that are subject to Emergency Planning and Community Right-to-Know Act (EPCRA) Title III, Section 313; and any other industrial or commercial discharge the permittee determines are contributing a substantial pollutant loading to the small MS4. The program must include priorities and procedures for inspections and for implementing control measures for such discharges.
PROGRAM DESIGN
AND PERMIT WORDING

• What should we inspect?
  – Purpose: Stormwater Quality
  – What are my city’s most common stormwater pollutants?
  – Where is my city relative to its watersheds?

• Who to inspect?
  – Do I have defined industrial districts?
  – Where are my repeat offenders?
    • What type of facility violates most often?
  – Create a list and use GIS to find areas where problems (both documented and potential) intersect facility groups.

• What can we commit to?
  – Who will be the designer?
  – Who will be the inspector?
  – What is our permit goal?
    • For first timers: JUST START A PROGRAM.
  – Keep it vague.
    • Written procedures
    • Don’t set quotas
    • Use the time you’re given (5 years)
MAPPING CORRELATIONS CAN AID IN IDENTIFYING HIGHER RISK CORRIDORS AND MONITORING POINTS.
OUR PROGRAM
CITY OF FRISCO
Once a comprehensive analysis of your city is complete, you can begin to think through the inspection process.

- **What to look for?**
  - Safety hazards such as fire potential, lack of secondary containment, lack of SOPs and training all realistically contribute to potential pollution.

- **What constitutes a “high risk” to stormwater quality?**
  - Be thorough.
  - Use a checklist.
  - Make recommendations.
In addition to assessing the facilities internally, we use our collected data to provide risk assessment reports that can help motivate facilities or provide justification for improvements.
DETAILED PHOTO LOGS HELP HIGHLIGHT DEFICIENCIES AND POSITIVES, AS WELL AS PROVIDING JUSTIFICATION FOR ANY NECESSARY ENFORCEMENT.

IN OUR REPORTS, EACH PHOTO IS DESCRIBED, AND A RECOMMENDATION FOR REMEDIATION IS PROVIDED. THESE ARE CROSS-CHECKED DURING FOLLOW-UPS.
ACHIEVING COMPLIANCE
SELLING THE PROGRAM AND COMMUNICATING WITH ENTITIES
COMMUNICATING WITH FACILITIES

• “Selling the Program”
  – Be respectful.
  – Accommodation within reason.
    • Set a reasonable date range for all inspections.
    • Give them an RSVP date, and allow one rescheduling.
  – Focus on Stormwater Quality and Risk vs Compliance.
    • We never approach entities with a domineering “enforcement-happy” attitude.
    • Frame message as a service for these facilities. It’s a free check-up that is provided by your city.
    • Remind them that if another agency was to come inspect there might be very serious consequences.

• Before Inspections
  – Provide a list of exactly what you’ll be looking at.
  – Give them a couple weeks to prep their site.

• During Inspections
  – Ask permission.
  – Bring appropriate PPE.
  – Use a buddy system to keep the conversation going.
  – Ask questions freely.
    • Most of the time, entities will offer to show you their highest risk areas once they feel comfortable with your presence.
  – Start off in the office.
  – Don’t demand.
  – Always ask to see permits, SPCC, SDS, and training logs.
  – Show interest in their internal programs.
  – TAKE PICTURES.
THANK YOU FOR YOUR TIME.

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