

**DEVELOPING AND  
IMPLEMENTING  
AN INDUSTRIAL  
INSPECTION PROGRAM**

**PHASE II CITIES**



# 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.

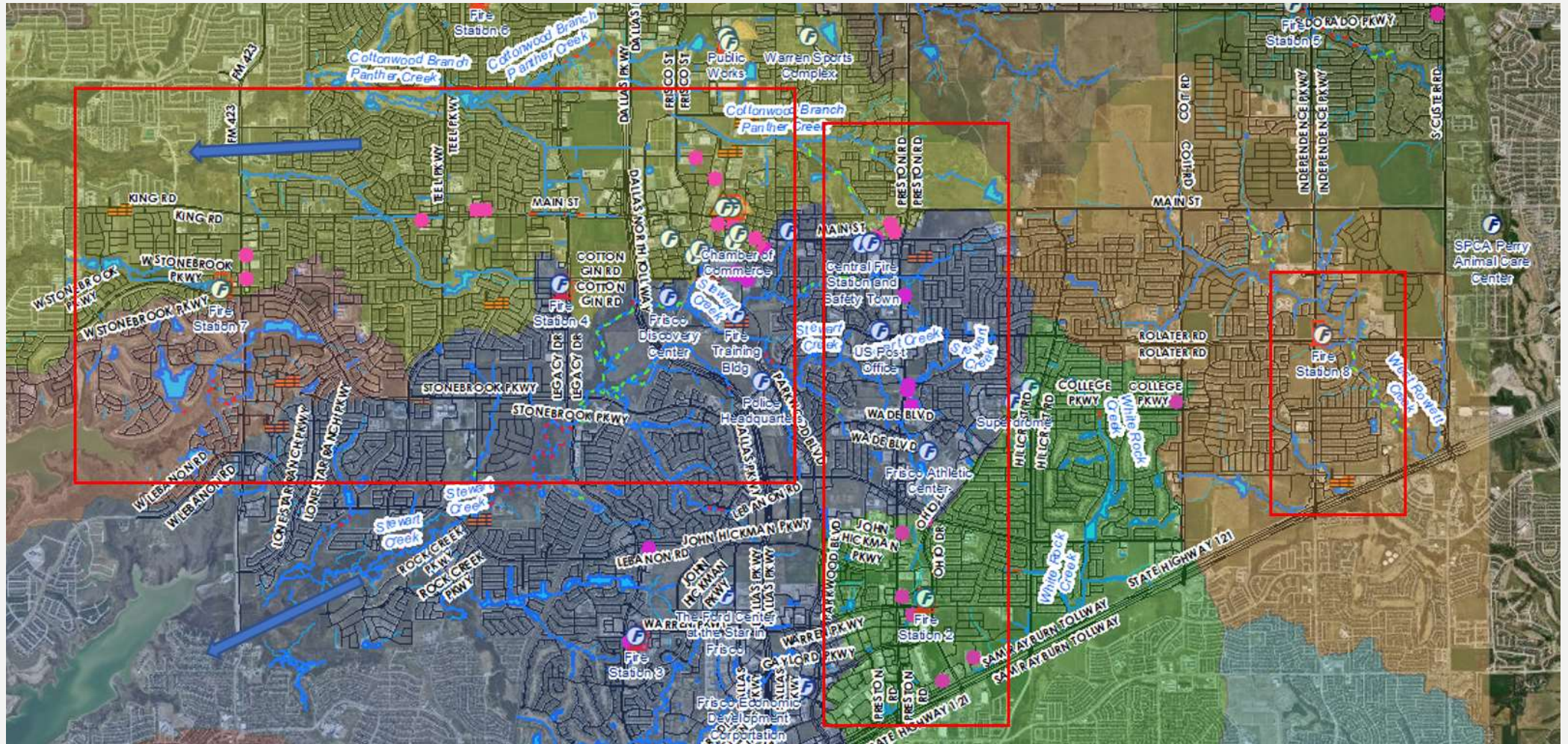


# **PROGRAM DESIGN**

# 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



Industrial Facility Checklist									
Date	_____			Time	_____				
Site Location	_____			Permit #	_____				
Stormwater Inspector	_____			Facility Contact Name	_____				
	_____			Phone	_____		Email	_____	
<b>Facility Classification</b> (Add this column)									
Maintenance Yard		Yes	No						
Fuel Station		Yes	No						
Hazardous Chemical Storage		Yes	No						
Urban Pollutants (pesticides, fertilizers, sand/sediment)		Yes	No						
Are indoor-only activities performed at this facility?		Yes	No						
Is this facility close to water bodies, streams, or aquifer recharge areas?		Yes	No						
Have improperly stored materials been previously identified at this facility?		Yes	No						
Have poor housekeeping practices been previously identified at this facility?		Yes	No						
Have illicit discharges been previously identified at this facility?		Yes	No						
Enforcement by EPA, TCEQ, or Fire Department within previous 2 years?		Yes	No						
Is self-monitoring required?		Yes	No	Procedures:					
Additional off-site locations within city limits?		Yes	No	Locations:					
<b>Written Procedures</b> (n/a = 4)									
• Is there an operational Spill Response Plan?		Yes	No						
• Is there an operational Spill Disposal Plan?		Yes	No						
• Are the Plans up-to-date?		Yes	No						
<b>Employee Training</b> (n/a = 4)									
• Are employees that handle chemicals trained according to Texas Hazard Communication Act?		Yes	No						
• Are employees that handle chemicals trained in the use of Material Safety Data Sheets?		Yes	No						
• Is Pollution Prevention Procedures training provided?		Yes	No						
• Is Spill Response and Disposal Procedures training provided?		Yes	No						
<b>MSDS Station</b> (n/a = 2)									
• MSDS Station accessible to all employees?		Yes	No						
• MSDS Station up-to-date?		Yes	No						
<b>BMPs – Best Management Practices - Outdoors Storm Drainage</b> (n/a = 6)									
• Inlet Protection Devices installed if necessary?		Yes	No						
• Inlets free of litter and debris?		Yes	No						
• Drop drains free of siltation and trash?		Yes	No						
• Wye inlets free of siltation and trash?		Yes	No						
• BMPs installed properly and in good working condition?		Yes	No						
<b>Material Stockpiles – Stored Outdoors</b> (n/a = 0)									
• Types of material stored on-site	(Add each -->)	Haz Chem	Flammable	Soil/Sand	Mulch	Fuel	Oils	Junk	
• Are Bins overfilled?			Yes	No					
• Can material reach storm drains?			Yes	No					
• Are BMPs needed such as filtration logs?			Yes	No					
<b>Fueling Areas</b> (n/a = 7)									
• Are there above-ground storage tanks on-site?		No	Yes						
• Are tanks or lines leaking?		No	Yes						
• Does fueling area show signs of spillage?		No	Yes						
• Is a stocked Spill Response Kit available on-site?		Yes	No						
• Are Spill Response Kits stocked with absorbent material?		Yes	No						
• Is there visible signage "Do not top off"?		Yes	No						
• Is there an "emergency pump shut-off" button or switch?		Yes	No						
<b>Vehicle Wash Areas</b> (n/a = 3)									
• Is there a wash area designated for vehicles and equipment?		No	Yes						
• Are there signs of vehicle wash run-off to storm drains or off-site?		No	Yes						
• Is dry cleaning of equipment encouraged?		Yes	No						

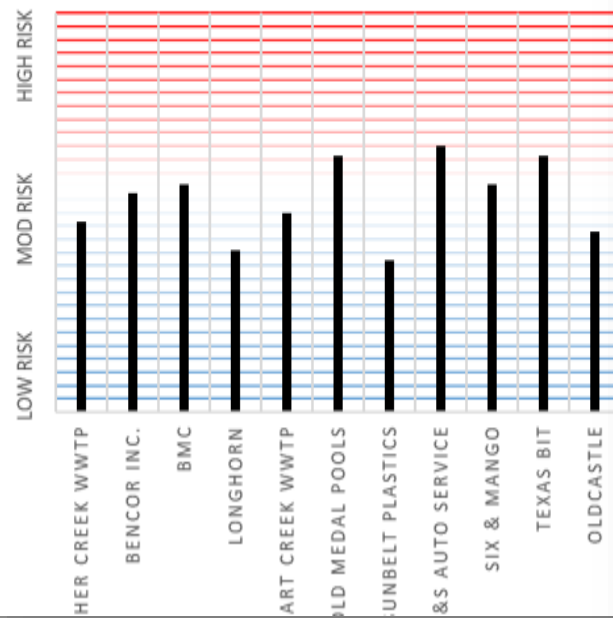
# INDUSTRIAL & HIGH RISK INSPECTIONS

Once a comprehensive analysis of your city is complete, you can begin to think through the inspection process.

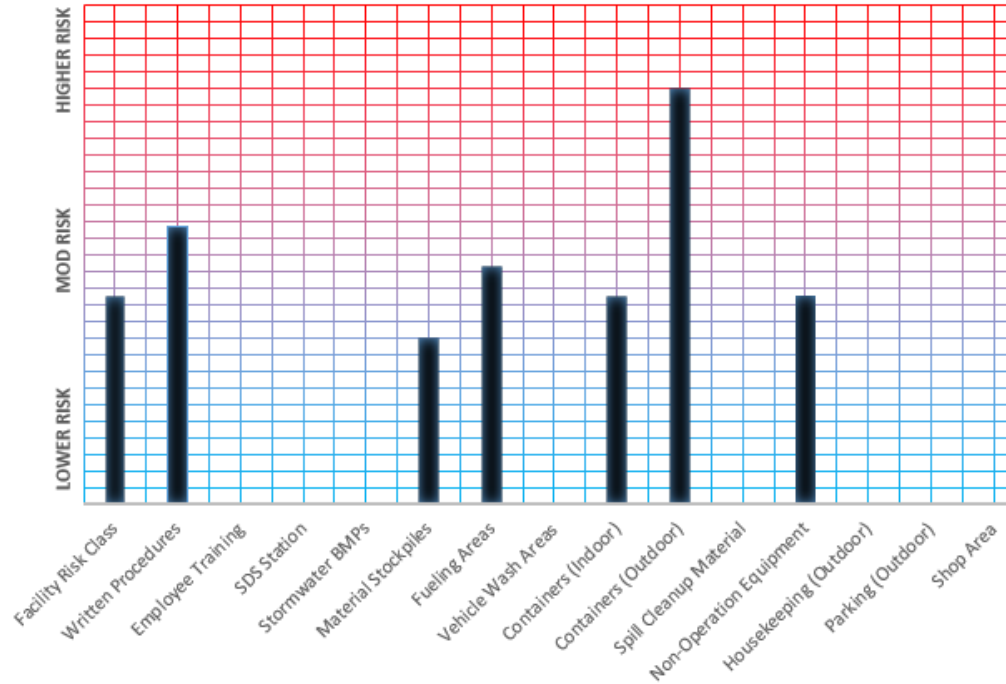
- What to look for?
- What constitutes a “high risk” to stormwater quality?
  - *Safety hazards such as fire potential, lack of secondary containment, lack of SOPs and training all realistically contribute to potential pollution.*
- Be thorough.
- Use a checklist.
- Make recommendations.



## FRISCO CITY FACILITIES STORMWATER POLLUTION RISK



## OLDCASTLE



**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.**

**RANDY COCHRAN**

***HYDROLOGIST***

**FRISCO PUBLIC WORKS**

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