



**RESOLUTION NO. 20121127-07**

**A RESOLUTION AMENDING THE STORM WATER POLLUTION PREVENTION PLAN FOR THE WET UTILITY SYSTEMS**

**WHEREAS**, TexAmericas Center is a political subdivision of the State of Texas with the powers and authorities specified in Chapter 3503 of the Special District Local Laws Code of the State of Texas; and

**WHEREAS**, TexAmericas Center owns and operates a sanitary sewer & industrial waste treatment plant, collection systems and water distribution system; and

**WHEREAS**, TexAmericas Center is regulated by the Texas Commission on Environmental Quality with respect to said distribution system; and

**WHEREAS**, 30 TAC 305.44 requires the development of a storm water pollution prevention plan; and

**WHEREAS**, a Storm Water Pollution Prevention Plan was adopted on December 14, 2010 by Resolution #20101214-04; and

**WHEREAS**, TexAmericas Center now requires an update to the existing policy based on contemporary circumstances, and

**NOW, THEREFORE, BE IT RESOLVED** by the Board of Directors of TexAmericas Center that the Storm Water Pollution Prevention Plan attached hereto as Exhibit A for the Wet Utility Systems is hereby adopted.

**PASSED AND APPROVED THIS 27<sup>th</sup> day of November, 2012.**

  
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Denis Washington, Chairman of the Board

**ATTEST:**

  
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Wayne Cranfill, Secretary-Treasurer

Attached: Storm Water Pollution Prevention Plan



## **STORM WATER POLLUTION PREVENTION PLAN**

X Plant and Industrial Waste Water Treatment Plant  
New Boston, TX 75570

**Revised: November 27, 2012 by Resolution 20121127-07**

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# Executive Summary

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TexAmericas Center (TAC), located in New Boston, Texas, has obtained a Notice of Intent (NOI) for TexAmericas Center located at 107 Chapel Lane, New Boston, TX 75570 for discharging storm water under the Texas Pollution Discharge Elimination System General Permit TXR050000 for Storm Water Discharges, Appendix A. The NOI was submitted to TCEQ on September 2, 2011 for the Sanitary Waste Water Treatment Plant (X Plant). The NOI for the Industrial Waste Water Treatment Plant (IWWTP) was submitted to TCEQ on September 2, 2011. Copies are located in Appendix A. The agency assigned permit numbers **TXR05X978** for the X Plant and assigned permit number **TXR05Y994** for the IWWTP. General Permit **TXR150000**, for construction sites that discharge storm water associated with construction activity, was previously submitted and approved by TCEQ in March 2003, see Appendix B. The location of the facilities is shown in Figure 1.

This storm water pollution prevention plan (SWPPP) is a shared SWPPP for the two co-located TAC facilities that are connected by utilities easements. This approach follows guidance found in the MSGP TXR050000, Part II, Section A(3). It also identifies potential sources of storm water pollution at the facilities and recommends appropriate best management practices (BMPs) to be implemented to minimize or eliminate the discharge of pollutants in storm water runoff. The key compliance requirements of this SWPPP are highlighted below:

- **Deadlines:** This SWPPP is required to be prepared and maintained on-site for the duration of the permit and three years beyond.
- **BMPs:** Best management practices to be implemented are listed in Table 4-1 (Section 4.0).
- **Record Keeping/Reporting Requirements:** All monitoring information and reports associated with the permit must be kept on site.
  - Record Significant Spills and Leaks;
  - Perform Routine Visual Inspections;
  - Monitor Storm Water Quality as required;
  - Complete an Annual Inspection and Report;
  - Update SWPPP and keep current; and
  - All records to be kept either in Appendix C, or in location's files.

## Executive Summary

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- **Availability:** The signed SWPPP must be retained at the facility at all times for at least three years after coverage under this Permit. A copy of the SWPPP must be made available to the TCEQ or EPA representative during a site visit or upon request.
- **Signatory Requirements:** The SWPPP and all reports and certifications must be signed by a responsible site manager or duly authorized representative who has responsibility for the overall facility operations of environmental matters.
- **Storm Water Discharge Monitoring Requirements:** The General Permit requires monitoring annually for specific hazardous metals and other constituents as stated in the Sector-specific requirements. The Permit also requires an Annual Facility Compliance Inspection to be conducted and a copy of the inspection to be retained on site for review.
- **SWPPP Update:** The SWPPP must be reviewed and updated whenever operational changes, site modifications or other factors, like an unexpected maintenance outage, could affect the discharge of storm water pollutants from the facility. The SWPPP must also be updated whenever conditions of this Permit are violated, or when the plan is not meeting its objectives in controlling pollutants in the storm water discharged from the facility. At a minimum, the SWPPP should be reviewed annually and updated as needed.

It is important to recognize that this SWPPP is only one part of the General Permit. The SWPPP provides reference to some of the Permit conditions; however, not all of the regulatory requirements are provided herein. The Pollution Prevention Team is responsible for reviewing the entire permit and ensuring compliance with all the terms and conditions.

## 1.1 INTRODUCTION

TexAmericas Center (TAC) is located in New Boston, Bowie County, Texas. TAC oversees the operation of the Wet Utilities Operations which includes a Sanitary Wastewater Treatment Plant (X-Plant) and an Industrial Waste Water Treatment Plant (IWWTP). These plants are located approximately 20 miles west of Texarkana, Texas on property formerly owned by the United States (US) Army, as part of Red River Army Depot (RRAD) and the Lone Star Army Ammunition Plant (LSAAP). The RRAD is primarily used for light industry related to the defense needs of the US Army. The RRAD serves as an ammunitions storage facility, equipment refurbishment operation and training center. The LSAAP's operations have been curtailed as part of the 2005 BRAC reorganization. Some operations will continue for the Army as they wind down and cleanup former operational sites as well as other independent commercial operations.

This Storm Water Pollution Prevention Plan (SWPPP) covers the operations of the X Plant and the IWWTP at TexAmerica's Center owned and operated by the **TexAmericas Center - New Boston, Texas**. It has been developed per the Part III requirements of the Texas Pollutant Discharge Elimination System (TPDES) General Permit for storm water discharges [No. TXR050000]. A copy is provided in Appendix A. This SWPPP describes these facilities and their operations, identifies potential sources of storm water pollution at the facility, recommends appropriate Best Management Practices (BMPs) to reduce the discharge of pollutants in storm water runoff, and provides a plan for periodic review of this SWPPP.

## 1.2 GENERAL FACILITY INFORMATION

Name of Facility: **TexAmericas Center**

Facility Address: 107 Chapel Lane, New Boston, Texas 75570

Standard Industrial Classification (SIC) Activity Codes: 4952 (TW – Treatment Works) 3795 and 4953 (IWWTP).

### Permit Information

Facility Permit Name: **TexAmericas Center**

Permit Number: TXR050000 (General Permit), Assigned Permit Numbers: TXR05X978 for X Plant and TXR05Y994 for IWWTP.

Initial Date of Coverage: 2008/2009

Number of Storm Water Outfalls: 2 for TXR05X978 (X Plant) and 3 for TXR05Y994 (IWWTP).

Receiving Waters: Elliot Creek (X Plant) and unnamed tributary of Panther Creek (IWWTP)

## **Facility Contacts**

Name: Nate Hahm

Title: Vice President of Operations

Telephone: 903-223-8051

Mailing Address: 107 Chapel Lane, New Boston, Texas 75570

Owner/Operator: TexAmericas Center

Name: Eli Hunt

Title: Director of Environment/Safety/Occupational Health, TexAmericas Center

Telephone: 903-223-9841

Mailing Address: 107 Chapel Lane, New Boston, Texas 75570

## **On-Site Emergency Contact**

Name: Philip Grant

Water and Wastewater Systems Manager

Telephone: 903-280-5704

## **1.3 OBJECTIVES**

The primary goal of the storm water permit program is to improve the quality of surface waters by reducing the amount of pollutants contained in the storm water runoff. Industrial facilities subject to an industrial storm water TPDES permit must prepare and implement a SWPPP for their facility.

This SWPPP:

1. Identifies potential sources of storm water and non-storm water discharges to the storm water drainage system;
2. Identifies and prescribes BMPs to reduce constituents in storm water prior to discharge and to prevent storm water contamination from occurring;
3. Prescribes actions needed either to bring non-storm water discharges under the TPDES General Permit or to remove these discharges from the storm drainage system;



4. Provides inspection criteria for meeting and complying with storm water quality discharge and elimination system permit requirements of TCEQ;
5. Prescribes an implementation schedule so as to ensure that the storm water management actions prescribed in the Storm Water Pollution Prevention Plan are carried out and evaluated on a regular basis.

**TABLE 1-1. SWPPP IMPLEMENTATION SCHEDULE**

SWPPP Element	Implementation Date
SWPPP maintained at site	From effective date of coverage of General Permit, through permit expiration, plus three years
Conduct evaluations for non-storm water discharges	Within 180 days of filing NOI, and after any changes to the operation
Conduct quarterly sampling and visual inspections for water quality physical parameters	Quarterly – starting first quarter following quarter in which NOI was submitted
Conduct periodic inspection to determine effectiveness of the Good Housekeeping Measures, Spill Prevention and Response Measures, Erosion Control Measures, Maintenance Program for Structural Controls, BMPs, and Employee Training	Quarterly – starting first quarter following quarter in which NOI was submitted
Implement BMPs	Ongoing
Conduct Benchmark monitoring for applicable storm water pollutants per Sector requirements	Semi-annually beginning the period following submittal of the NOI
Conduct Numeric Effluent Limitations monitoring	Annually in year following first full quarter after submitting NOI submittal
Conduct Annual Comprehensive Site Compliance Evaluation	Annually - beginning by December 31 of each year, beginning with the calendar year that includes the first full quarter following submittal of an NOI
Develop Annual Comprehensive Site Compliance Evaluation Report	Annually, within 30 days of performing the Annual Site Comprehensive Evaluation
Pay annual permit fee to TCEQ	Annually

**2.1 SITE MAP DESCRIPTION**

The sitemap Figure 2 shows the following features required by the permit:

- Facility property;
- Storm water conveyance system and outfalls;
- Outline of the storm water drainage area for each outfall, and the drainage flow patterns;
- Existing structural control measures to reduce pollutants in storm water runoff;
- Locations where the following activities are exposed to precipitation:
  - Vehicle and equipment maintenance and/or cleaning areas,
  - Loading/unloading areas,
  - Process waste water treatment units (including ponds),
  - Storage tanks and storage areas; and
- Locations of potential erosion or salt/sand runoff, if any.

**2.2 STORM WATER POLLUTION PREVENTION TEAM**

The Storm Water Pollution Prevention Team is responsible for developing, implementing, maintaining and revising this SWPPP. The members of the team are familiar with the management and operations of the facility. Table 2-1 lists the members of the team and identifies their primary responsibilities.

Assigning specific individuals, or a team, to develop and implement the SWPPP serves several purposes. Naming an individual or team makes it clear that part of each identified person's job is to prevent storm water pollution. This also provides a contact for people outside the facility who may need to discuss aspects of the storm water pollution prevention plan. If the team approach is appropriate, it is important to identify key people on-site with sufficient knowledge of the facility operations. These individuals will be able to provide structure and direction to the facility's storm water management program.

An initial task is to define and agree upon a clear and reasonable set of goals for the facility's storm water management program. For each team member the responsibilities and roles are defined. The types of responsibilities include assessment, management recommendations, implementation, evaluation, and reporting. Those responsible for maintaining the pollution prevention plan must be

aware of any changes in the nature of the facility's operation. Changes will require revisions to the plan to make sure that it remains effective.

Table 2-1 below shows the storm water pollution prevention team.

**TABLE 2-1. Storm Water Pollution Prevention Team**

<b>Pollution Prevention Team Members</b>			
<b>NAME</b>	<b>TITLE</b>	<b>COMPANY</b>	<b>RESPONSIBILITY</b>
William V. Cork 903-223-9841	Executive Director / CEO	TexAmericas Center, New Boston, TX	Overall accountability for SWPPP implementation
Nate Hahm 903-223-9841	Vice President of Operations	TexAmericas Center, New Boston, TX	Oversight of SWPPP implementation
Philip Grant 903-280-5704	Water and Wastewater Manager	TAC Utilities, New Boston, TX	Conducting inspections, development of employee training, testing for non-storm water discharges, Implementing employee training
Rickie Henderson 903-293-3425	Wastewater Operator	TAC Utilities, New Boston, TX	Conducting inspections, sampling, testing for non-storm water discharges
Eli Hunt 903-223-9841	Director of Environment/Safety/Occupational Health	TexAmericas Center New Boston, TX	Development of SWPPP, revising SWPPP as required and providing technical assistance.

**3.1 DESCRIPTION OF SOURCES**

The focus of this assessment is to identify the most important pollutant sources needing preventive and/or corrective actions. A site inspection was conducted in October 2008 at the X-Plant by the Pollution Prevention Team members (at that time), and an inventory of exposed materials was developed. Chlorine and sulfur dioxide, Emergency Planning and Community Right to Know Act (EPCRA) Section 313 chemicals, are present in reportable quantities at the facilities. The regulations require that the description of sources address the following elements:

- Significant materials that have been handled, treated, stored, or disposed of in a manner to allow exposure to storm water;
- Method and location of on-site storage or disposal of significant materials;
- Summary of pollution sources (i.e., areas, activities, or materials) which may contribute pollutants to storm water runoff;
- Material, equipment, and vehicle management practices currently employed to minimize contact of significant materials with storm water discharges; and
- Location and description of existing structural and non-structural storm water control measures, including a description of any treatment provided.

**3.2 INVENTORY OF EXPOSED MATERIALS**

Subsequent inspections have been conducted at both facilities. During the inspections, the following have been identified as potential sources of storm water contamination, and BMPs are suggested to prevent storm water pollution from these areas:

- Treatment structures and Tanks:
  - X Plant: Sludge digesters, Clarifiers, Trickle filter, chlorine contact basin, sludge drying beds; and
  - IWWTP: Chromate storage tanks, clarifiers, phosphate lagoons, slop oil tank, oil/water separator, sludge drying beds;
- Rooftops potentially contaminated by industrial activity at RRAD;
- Material storage in facility yard;
- Parking lot sheens;
- Oily water in ponds at IWWTP;
- Run-on and run-off from industrial activities on the Army's facilities

### 3.3 LIST OF SIGNIFICANT SPILLS OR LEAKS

There has been one documented significant spill from TexAmericas Center Wastewater Treatment Facilities in 2012. The General Permit requires a listing of significant spills or leaks of toxic or hazardous substances that occurred in areas exposed to storm water during the last three years.

There has been one reportable release of stored products from the facility that reached a navigable waterway. The spill occurred on September 22, 2012. Approximately 3000 gallons of process wash rack water was released to the ground at the Industrial Wastewater Treatment Plant. The water reached an unnamed creek adjacent to Panther Creek. No sheen was produced on water to either Panther Creek or to adjacent unnamed creek. Upon arriving to the spill, we immediately took samples of the water going into the creek and had them sent to Red River Lab. The spill was caused by human error. The Industrial Wastewater Treatment Plant Operator left a grit pump on, which sent overflow water to a roll-off box that was located in a drying bed which was used as secondary containment. The water overflowed the secondary containment and based upon the speed of the pump, how long the pump how been running, and the volume of the roll-off box and secondary containment, we figured that approximately 3000 gallon conservatively had reached the unnamed creek adjacent to Panther creek. After discovery, absorbent materials were placed on the spill around the drying bed. Oil-only absorbent pads and two rows of booms were placed in the adjacent creek to collect and stop any possible, if any oil from traveling downstream. The pads and booms were collected and disposed of properly. After receiving the lab results, we confirmed that there was no oil or any hazardous substances within the water.

**NOTE:** If a significant leak or spill should occur at the facility, these procedures are to be followed:

In the event of an emergency release, the staff member in the immediate vicinity shall notify the Emergency Coordinator, who will evaluate the spill as an incidental or emergency release. If it is considered an emergency release, the Emergency Coordinator will contact an outside contractor to the site and clean up the release.

**Emergency Coordinator**

Philip Grant	Office	903-223-9841
Water and Wastewater Systems Manager	Cell	903-280-5704

**Alternate Emergency Coordinators**

Nate Hahm, Vice President of Operations	Cell	903-908-4120
Eli Hunt, Director of Env., Safety/Occ. Health	Cell	903-701-4916

Response procedures consist of the following steps:

- The employee discovering the spill will immediately notify their supervisor. The supervisor will determine if notification of the RRAD fire department is required;
- The Spill Coordinator will assess the nature and extent of the spill and determine if the spill presents a potential threat to human health or the environment;
- As necessary, the Spill Coordinator will evacuate site personnel, notify local authorities, and advise emergency response personnel as necessary;
- The Spill Coordinator will authorize immediate action to contain the spill to the plant site. If the spill should reach a drainage ditch or sewer, the Spill Coordinator will authorize further action to stop the migration of the spill. Oil absorbent booms will be placed in waterways or streams to contain oil;
- To the extent feasible, the spilled material will be recovered and reclaimed or disposed. Material such as absorbents and contaminated soil and water will be disposed of at an appropriate facility;
- The Spill Coordinator will keep a daily log of activities during the spill event, including the nature and extent of the spill, the response actions, any outside assistance, the quantity of spill response materials used, an assessment of environmental damage and any contact with regulatory agencies; and
- The Spill Coordinator will prepare follow-up reports for submission to the appropriate regulatory agencies.

Response measures may include the use of sorbent materials or booms, drum repair putty, or the construction of temporary dikes, swales and berms to prohibit or control the flow of spilled materials. Sorbent materials and miscellaneous equipment are available on-site and in the event of a spill, will be used appropriately to contain and recover spilled materials.

Spill response equipment at the RRCF Wet Utility Operations include absorbent pads and oil booms, as well as shovels, rakes and personal protective equipment. A detailed list of the stocking order quantities for spill response equipment located at TAC facilities can be found in Table 3-10. Response equipment is maintained by designated personnel and is restocked as materials are used.

Table 3 Spill Response Material

Location	Response Material	Amount/Size
IWWTP	Absorbent Booms	10 @ 4'
IWWTP	Absorbent Pads	100
Mntc. Shop	Absorbent Booms	10 @ 4'
Mntc. Shop	Absorbent Pads	100

In the event of a spill of any petroleum substances, the employee that discovers the event must notify his/her supervisor immediately. The supervisor will then determine if the RRAD fire department is to be notified and contact the appropriate personnel.

The Clean Water Act (CWA), as well as sections 311 and 307a of the Superfund Amendments Reauthorization Act (SARA) contain reportable quantities for petroleum substances. If a spill of a substance with no listed reportable quantity occurs, the reportable quantity is 1 pound.

### 3.3.1 Outside Assistance

Outside services such as earth moving equipment, vacuum trucks, disposal contractors, fire department and hazardous material response teams may also be enlisted, as necessary. Contact numbers are provided in Section 3.8. Specific contractor response measures are to be implemented as directed by Spill Coordinator.

The Spill Coordinator is responsible for notifying outside emergency response organizations in the event their services are needed. Outside assistance may be requested for traffic control, community evacuation, fire, spill control and cleanup, and

medical emergencies. The Spill Coordinator is also responsible for retaining cleanup subcontractors and procuring necessary materials and equipment.

**3.3.2 Cleanup and Disposal**

Spill cleanup activities will be conducted under the general supervision of the Spill Coordinator. The Spill Coordinator will designate plant personnel and equipment and authorize assistance as needed. Recovered materials will be reused if possible, either by returning to storage or reclaiming. Spill residues and other contaminated materials will be characterized using Material Safety Data Sheets and disposed of in accordance with applicable regulations in a manner approved by the Spill Coordinator. Any supplies or equipment depleted or destroyed, as a result of the spill or subsequent response activities will be replaced as soon as possible.

Released material, contaminated soils and water, and other materials used in the response effort will be disposed of properly through an outside company. Final disposal of material will be by incineration, landfill, or other approved method.



# SECTION FOUR

## Site Map Description, Pollution Prevention Team

**TABLE 3-1. SUMMARY OF POTENTIAL POLLUTANT SOURCES**

*For each source area add all materials and equipment exposed to storm water and list the potential pollutants (e.g. oil and grease) associated with the source. Listing should include types of scrap, scrap processing equipment, liquid storage tanks, dumpsters and maintenance areas previously described in Section 3.2.*

Significant Exposed Source Areas	Exposed Materials/Sources	Potential Storm Water Pollutants
Loading/Unloading Operations, Material Transfer and Handling Activities, Storage of Material on site	Truck loading and unloading operations Spills and leaks from trucks/tanks Accumulated Debris and litter Exposed Loading Docks Loading Practices Trucks parked in loading and unloading area Refuse dumpsters and containers Pools of Liquid	Oil and Grease Hydraulic Fluid, Brake Fluid, & Antifreeze Gasoline and Diesel Fuel Sodium Chloride, Calcium Chloride Pigments, Lead, Resins, & Solvents Metals: Copper, Lead, & Zinc Garbage, Litter, Debris and Trash
Storage for solid wastes, Material Transfer and Handling Areas, Equipment Machinery and Parts Storage, Scrap Storage, Rooftops, Sludge Drying Beds, Mowed areas.	Scrap Machinery and Equipment Storage of drums Buildup of Oily Film Stains on Pavement Pallet Accumulation Area	Oil and Grease, Hydraulic Fluids, Other Lubricants Metals: Copper, Lead, & Zinc Pigments, Lead, Resins, & Solvents Garbage, Litter, Debris and Trash Materials Being Stored Sediment Phosphorus, Nitrogen, Potassium
Industrial Equipment, Trucks, and Vehicles, Employee Maintenance, & Storage Activity.	Corrosion, Accumulated Solids Leakage from Vehicles, Oil and Grease, Hydraulic Fluid Equipment removed from vehicles Gravel and other Sediment Accumulation, Accumulated Particulates Damaged or Deteriorated Containers Racks of Material and Used Parts Racks of Parts and Supplies Unpaved areas and Degraded Asphalt	Metals: Lead, Copper, Zinc, and others Oil and Grease, Hydraulic Fluids, and Antifreeze Sediment, Gravel, and Debris Garbage, Litter, Debris and Trash Gasoline and Diesel Fuel
Soil, gravel, or sand stockpile	Bulk soil, rock, sand storage	Suspended Solids
Introduction into the IWWTP of oils, metals and other contaminants which the IWWTP is not designed to treat by users of the facility	Oils, metals and other contaminants with the IWWTP is not designed to treat	Oils, metals and other contaminants with the IWWTP is not designed to treat

TABLE 3-2. SUMMARY OF MONITORING REQUIREMENTS

Type	Frequency	Observations	Reporting Requirements	Monitoring Location
Routine Visual Inspections	Quarterly	Dry weather flow, stains, sludges, color, odor, other physical characteristics (see checklist in Appendices). Site drainage conditions, potential pollution sources, performance of BMPs	Date, person performing inspection, outfall locations, potential significant sources, housekeeping observations	All Outfalls, Drainage Swales, Manholes and Inlets
Non-Storm Water Discharges	Within 180 days of filing NOI	Dry weather flow, other indicators of non-storm water discharge	Date, location, potential significant sources. Keep certification in SWPPP. Completed on 5/3/2010	All Drainage Outlets
Qualifying Storm Water Discharge Event	Quarterly	Document findings for color, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, odor and any other noticeable indicator of storm water pollution.	Date, person performing inspection, outfall locations, date, time, type of discharge (runoff or snowmelt) visual quality indicators, potential significant sources, housekeeping observations	Designated outfall at each facility
Sampling for Numeric Effluent Limitations	Annually, by December 31	Sample and analyze for hazardous metals as defined in Part III, Section D(1) at final outfall at each facility	Prepare DMR and retain on file for Agency inspection	Final Outfall at each facility
Benchmark Monitoring for BOD <sub>5</sub> as defined in Sector T	Bi-annually	Conduct sampling and analysis for specified pollutants	Prepare DMR and submit to TCEQ no later than March 31 for the preceding year.	Each Outfall

# SECTIONFOUR

## Site Map Description, Pollution Prevention Team

Annual Site Compliance Evaluation	Annually	Site drainage conditions, potential pollution sources, performance of BMPs, training documentation	Date, person performing inspection, scope, observations, updates to the SWPPP. Complete report within 30 days of evaluation.	Entire Facility
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**TABLE 3-3. SAMPLING AND REPORTING REQUIREMENTS BY SECTOR**

Sector	Frequency	Observations	Required Analysis	Monitoring Location
T	Bi-annual	Dry weather flow, stains, sludge's, color, odor, Site drainage conditions, potential pollution sources, and any other noticeable indicator of storm water pollution	Biochemical Oxygen Demand (BOD5), Visual – including observations of color, odor, turbidity, floating solids, foam, oily sheen or other obvious pollutant indicators	SW-001 SW-002 SW-003 SW-004 SW-005

**4.1 BEST MANAGEMENT PRACTICES**

Storm water management control measures are referred to as best management practices (BMPs). These BMPs help reduce the amount of pollutants discharged in the storm water from the facility. At a minimum, the General Permit requires that the following BMPs be considered:

- Good Housekeeping;
- Preventive Maintenance;
- Spill Prevention and Response;
- Management Control
- Structural Controls;
- Employee Training;
- Routine Visual Inspections; and
- Concurrent Development of Other Plans with the SWPPP.

**4.1.1 Good Housekeeping**

Good housekeeping practices are intended to maintain areas in a clean and orderly manner. These practices generally involve limiting the exposure of potential pollution sources to storm water by removing or covering the source. Table 4-1 lists good housekeeping practices for the facility.

**4.1.2 Preventative Maintenance**

The recommended preventive maintenance program for TexAmericas Center facility includes inspection and testing of equipment and vehicles that could fail or leak, resulting in the discharge of pollutants to storm water. Table 4-1 lists preventative maintenance practices for the facility.

**4.1.3 Spill Prevention and Response**

Appropriate spill prevention and response for these facilities is outlined in the Spill Prevention Control and Countermeasure Plan. This plan is required if over 1320 gallons of oil (hydraulic oil, petroleum, etc.) are stored above ground on site, specific to those potential pollution sources which could spill or leak and should be inspected on a regular basis. All observed spills or leaks are to be immediately contained by drip pans or absorbents using spill kits. Leaks from equipment and piping containing potential pollutants are to be repaired as soon as possible. Employees are to be informed of their responsibilities for Spill Prevention Control and Countermeasures and storm water pollution prevention in Environmental, Health and Safety (EH&S) training.

Containment basins should be provided for material transfer areas at loading docks, and at storage areas. These containment basins are to collect materials on site if a spill were to occur, so the contents would be confined to the secondary containment area and then salvaged or disposed of according to regulations. The use of concrete pads, dikes, curbs, berms, or other appropriate controls shall reduce the potential of contamination of storm water from areas where liquid or solid materials are stored. Spill control absorbents, and recovery equipment/tools will be kept at specific locations to assist in the response activities as noted in the Spill Prevention Control and Countermeasure (SPCC) Plan. Accumulated storm water in containment structures must be inspected/tested soon after storm events and removed and properly disposed. Failure to empty containment structures reduces the storage capacity and may eventually jeopardize the structure's ability to contain the vessel's contents in case of a spill or leak.

- In areas where liquid or solid materials are transferred in bulk from truck, the recommendation is to develop and implement measures to minimize contact of materials with precipitation or runoff. Use storage containers located within containment areas and drip pans or other measures (e.g. at hose reels, connection points with tank trucks) to prevent spills from contacting precipitation or runoff.
- In areas where materials are transferred as packaged materials, provide appropriate protection such as overhangs or door skirts to enclose trailer ends at truck loading docks, or equivalent controls.
- Structures used to limit pollution at material handling and storage areas should control drainage through the use of manually operated valves or other similar positive control devices. Pumps may be used to empty containment areas only after verification that the accumulated storm water is free from contamination. If a facility is not equipped with such controls, the facility's separate containment system should prevent or divert a discharge of spilled materials until the materials can be recovered. Table 4-1 lists appropriate spill and response measures for the facility.

**4.1.4 Management Control**

Management control requires pretreatment by users of the IWWTP which discharge into the system contaminants which the IWWTP is not designed to treat.

**4.1.5 Structural Controls****Diversions**

Diversions are used to divert storm water away from high risk areas and prevent contaminants and sediment from mixing with the runoff. Use curbs, culverts, gutters, sewers, or other forms of drainage control to minimize storm water contamination in all outside storage areas.

**4.1.6 Employee Training**

Effective management of storm water pollution requires that facility staff be aware of conditions that cause pollution. Develop an employee-training program and conduct the training annually. Review the SWPPP information with all new employees. The following subjects are recommended for the training program:

- Objectives and requirements of the SWPPP;
- Spill prevention, response, and reporting procedures;
- Good housekeeping practices;
- Materials management practices; and
- Storage procedures.

The Facility Manager should evaluate the effectiveness of the training program and make improvements as necessary to promote employee awareness and accountability.

**4.1.7 Routine Visual Inspections**

Compliance inspections will be completed by TexAmericas Center (TAC) personnel and/or their designee. Several SWPPP inspections are required by the TPDES General Permit. A listing of these inspections is shown in Table 3.2. The inspections will determine the effectiveness of structural and non-structural controls such as erosion control and Good Housekeeping, Maintenance Program for Structural Controls, Best Management Practices and the Employee Training Program for Spill Prevention and Response activities. A checklist is used during BMP inspection to make an assessment of how the recommended BMPs put into place are functioning. Blank storm water BMP checklists are contained within this document in **Appendix C**. Completed checklists are kept on file

and discussed by the Pollution Prevention Team regularly at training so that any outstanding issues may be resolved.

The TPDES General Permit requires a quarterly visual inspection of the storm water runoff during a representative storm event. Document findings for color, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, odor and any other noticeable indicator of storm water pollution. Include on the records: personnel conducting inspection, date, time, type of discharge (runoff or snowmelt) and visual quality indicators. Discuss results with the Pollution Prevention Team to resolve any pollution problems.

#### **4.1.8 Development of Other Plans Concurrent with the SWPPP**

The following plans may need to be developed concurrently with the SWPPP. They will be incorporated into the SWPPP by reference.

- Spill Prevention Control and Countermeasures Procedures
- (40 CFR 112)
- Storage volume is yet to be determined.
- Spills and leaks commonly comprise the source of storm water pollution. This SWPPP is developed to work in conjunction with a Spill Prevention Control and Countermeasure (SPCC) Plan.
- The SPCC Plan will specify material handling procedures and storage requirements for significant petroleum and related materials as per 40 CFR 112.
- Equipment and procedures necessary for cleaning up spills and preventing the spilled materials from entering surface waters will be identified, such as spill kits.
- All employees will receive training on the response procedures.

TABLE 4-1 BEST MANAGEMENT PRACTICES

**Good Housekeeping**

1. The quantity of scrap/used equipment and spare parts stored outside should be minimized, although some outside storage may be required for safety reasons or to meet local building and fire codes. Materials stored outside should be new or cleaned articles, where practicable, they will moved under roof or to a covered area, stored on pallets or racks and covered with a secure leak-proof tarpaulin, or removed from the site.
2. All dumpsters with significant hazardous materials should be placed under roof, over pavement/concrete, have removable lids, or be covered by a tarpaulin. All wastes should only be transferred to safe containers, when necessary.
3. Trucks and equipment should not be washed or steam cleaned outside.
4. Notices should be posted to discourage the dumping of materials into storm drains. Drip pans should be used under leaking vehicles.
5. All debris produced should be swept up and placed in a container for proper disposal.
6. Regularly sweep and clean dust, dirt, litter and accumulated debris from paved surfaces. Dry pickup should be practiced in all outdoor areas. Minimize the use of water to hose down pavement to remove dirt and litter.
7. Remove trash, accumulated debris, old palettes, and scrap on a regular basis.
8. Clean all inlet catch basins, and inspect all equipment and containers for corrosion/leaks.
9. Conduct regular housekeeping inspections.
10. Discuss housekeeping and material handling/storage with contractors conducting construction and maintenance activities at all facilities.



TABLE 4-1 (Continued)

<b>Preventive Maintenance</b>
<ol style="list-style-type: none"><li>1. Storage systems, and process and waste oil storage systems should be inspected monthly for leaks, cracks, and other signs of deterioration. Any observed problems should be repaired as soon as practicable.</li><li>2. Material storage and dock areas should be inspected regularly for corroded or damaged drums, boxes, crates, and bags, or other potential causes of leaks and spills. Items identified should be repaired or contained, and any spillage immediately cleaned up and properly disposed.</li><li>3. Fluids used and/or stored in maintenance and dock areas should be covered and moved inside as soon as possible.</li><li>4. Facility equipment used or stored outside such as trucks and equipment parts should be inspected and maintained to minimize corrosion, leaks and spills in accordance with manufacturer's manuals. Visual inspections and regular replacement of seals and gaskets should be included in this maintenance program.</li></ol>

TABLE 4-1 (Continued)

<b>Spill Prevention &amp; Response</b>
<ol style="list-style-type: none"><li>1. Any observed leak or spill should be contained, cleaned up, and repaired as soon as possible.</li><li>2. All gasoline, hydraulic fluid and diesel fuel spills should be cleaned up as soon as possible.</li><li>3. An adequate supply of absorbent materials should be stored near fuel, used oil, above ground storage tank (AST), drum staging areas, and other areas subject to spills, and used as needed to contain and clean up spills. Any spent absorbents must be containerized and properly disposed after use. Replace supply of absorbent rapidly after use.</li><li>4. Proper storage containers should be used for materials stored outside. Any damaged containers should be repaired or the material in the damaged container transferred to an undamaged container. Drums containing any hazardous material must be stored on containment pallets or be stored inside a building where leakage would be contained.</li><li>5. Outdoor drum staging, scrap parts and materials areas should be designed to reduce the potential for storm water exposure. These materials should either be moved indoors, or placed in a bermed area, under roof or covered to prevent direct exposure to rainfall and run-on.</li></ol>

## 5.1 NON-STORM WATER DISCHARGES

The General Permit prohibits unauthorized non-storm water discharges to the storm drainage system unless specifically covered by a separate TPDES permit. All storm water that falls directly into any water treatment dike, basin, structure, etc. will be considered to be handled under the current facility TPDES Permit. Furthermore, the Permit requires that the facility operator certify that all storm water outfalls have been evaluated for the presence of non-storm discharges.

Typical sources of unauthorized, non-storm water discharges include:

- Floor drains, sinks, and other waste discharges to the ground surface;
- Boiler blow down or cooling water;
- Vehicle and equipment wash water; and
- Steam cleaning wastes.

Under the Multi-Sector General Permit, certain non-storm water discharges are authorized as long as they are identified in this Plan. The TPDES Multi-Sector General Permit authorizes the following types of discharges:

- Discharges from fire fighting activities;
- Fire hydrant flushing;
- Potable water sources including waterline flushing;
- Irrigation drainage;
- Lawn watering;
- Routine external building wash down containing no detergents;
- Pavement wash waters where spills/leaks have not occurred; and
- Air conditioning condensate.

Some or all of the above non-storm water discharges may occur at the subject facilities or from our operations of our utilities program.

**6.1 SITE COMPLIANCE EVALUATION - FACILITY MONITORING**

Facility monitoring includes site inspections and observations of storm water discharge, in addition to required sampling and analyses. The purpose of monitoring is to evaluate storm water outfalls for the presence of non-storm water discharges and evaluate the effectiveness of the facility pollution prevention activities in controlling contamination of storm water discharges. Monitor the following elements as specified in the following sections of the General Permit:

Action Item	General Permit Section
Monitoring of non-storm water discharges	(III)(A)(3)
Quarterly Compliance Inspections	(III)(A)(5)(g)
Quarterly Visual Monitoring	(III)(A)(5)(h)
Semi-annual Benchmark Monitoring	(IV)
Annual Numeric Effluent Limitations Monitoring	(III)(D)(1)
Annual Compliance Inspection	(III)(A)(7)

In addition to the routine visual inspections, the General Permit requires that an Annual Comprehensive Site Evaluation be conducted. The objectives of the evaluation are to assess the overall effectiveness of this SWPPP and to modify or improve the SWPPP, as appropriate.

The Annual Comprehensive Site Evaluation will include the following elements:

- Modify or update the site map to reflect current conditions;
- Visually inspect, verify and update potential pollution sources;
- Inspect outfalls for evidence of pollutants entering the drainage system;
- Verify that the recommended BMPs have been implemented, are being maintained, and are effective in controlling storm water pollution;
- Identify any needed improvements or additional control measures; and
- Inspect the availability of adequate spill response equipment and supplies.

The Director of Environmental/Safety/Occupational Health or designee will perform the site compliance evaluation once each year. An evaluation form will be filled out each time an Annual Comprehensive Site Evaluation is conducted. A report will be prepared, within 30 days following the Evaluation, documenting the findings of the site compliance evaluation, including the following:

- Date(s) of the site evaluation;
- Name(s) of the evaluators;
- Summary of scope of evaluation (method of inspection, areas inspected);
- Major observations related to the elements listed above;
- Sections of the SWPPP to be modified to incorporate findings;
- Incidents of non-compliance, or certify that the facility is in compliance with the SWPPP; and
- Signed certification.

## 6.2 ANNUAL SWPPP UPDATE

Based on the findings of the Annual Comprehensive Site Evaluation, the SWPPP must be modified to reflect any changes in conditions at the site. Any changes to the SWPPP must be implemented within 12 weeks after the evaluation.

The SWPPP certification must be signed by the certifying authority each year and retained with the SWPPP.

**(NOTE:** The SWPPP must also be amended whenever there is a change in design, construction, operation, or maintenance, which may impact the potential discharge of storm water pollutants.)

### 6.3 CERTIFICATION STATEMENT

“I certify under penalty of law that this document and 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 contained in the plan. I also certify that the storm water discharges will not negatively impact threatened or endangered species, or result in any modification or destruction of a designated critical habitat for these listed species, or negatively impact historic places.

Based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information; the information contained in this document is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for providing false information, including the possibility of fine and imprisonment. In addition, I certify under penalty of law that, based upon inquiry of persons directly under my supervision, to the best of my knowledge and belief, the provisions of this document adhere to the provisions of the storm water permit for the development and implementation of a Storm Water Pollution Prevention Plan and that the plan will be complied with.”

\_\_\_\_\_  
Signature of Plan Reviewer

\_\_\_\_\_  
Date

**Eli Hunt**  
**Director of Environmental/Safety/Occupational Health**

\_\_\_\_\_  
(Signature of Authorized Representative)

\_\_\_\_\_  
Date

**William V.Cork**  
**Executive Director/CEO**