

## ANNUAL REPORT

### DALLAS EXECUTIVE AIRPORT

April 23, 2007

#### I. INTRODUCTION

On August 14, 2006, the Texas Commission on Environmental Quality (TCEQ) signed and published the latest version of the Texas Pollutant Discharge Elimination System (TPDES) Storm Water Multi-Sector General Permit TXR050000. This permit oversees storm water discharges from 30 types of industrial activities, including those involving air transportation. Air transportation facilities that are classified as SIC Code 45 and which have vehicle maintenance shops, equipment cleaning operations, and airport or aircraft deicing/anti-icing operations are regulated under this permitting program. Areas located within a regulated air transportation facility that are directly involved in vehicle maintenance (e.g., vehicle rehabilitation, mechanical repairs, painting, fueling, lubrication, etc.), equipment cleaning activities, and airport or aircraft deicing operations are specified as industrial activities and require permit coverage. The specific requirements for these activities are found under sector 5 of the general permit.

The Aviation Department and tenants will file an NOI for the TPDES MS General Permit within 90 days of the implementation date. On July 1, 2003, the Aviation Department and its tenants transferred to the current SWPPP (dated April 2003). This SWPPP replaced the "Dallas Redbird Airport Storm Water Pollution Plan, City of Dallas, Texas" dated September 1996 for the Aviation Department and their tenants. The 2003 SWPPP meets the TPDES MS General Permit. (Some tenants may also have individual SWPPPs that are more specific to their industrial activity and are more stringent than this document.)

This permit requires that qualified personnel conduct a "Comprehensive Site Compliance Evaluation" at least once yearly.

Objectives of this comprehensive evaluation are as follows:

1. Confirm the accuracy of the description of potential pollutant sources contained in the SWPPP.
2. Determine the effectiveness of the SWPPP.
3. Modify the SWPPP as necessary.
4. Assess compliance with the terms and conditions of the facility's storm water permit.

The Dallas Executive Airport (RBD) site compliance evaluations were conducted by Dallas Department of Aviation (DOA) Environmental Specialists and Pollution Prevention Team (PPT) members.

This annual report is required by the permit. It defines the scope and summarizes the Comprehensive Site Compliance Evaluation performed during the 2006 permit year. It is to be retained as part of the SWPPP for at least three years from date of evaluation.

The current SWPPP for RBD was made effective in April, 2003. It identified airport operators that have elected to become co-permittees with the DOA to obtain General Permit coverage for storm water discharges associated with industrial activities from their area of operation. It also included an inventory of exposed materials, descriptions of potential pollution sources as well as pollution prevention measures and controls. All airport operators that became co-permittees by the SWPPP effective date, and whose employees or subtenants perform industrial activities were included in this Comprehensive Site Compliance Evaluation. Results of this Evaluation are presented as Attachment 1. For the purpose of implementing the SWPPP, the permit year is from January 1 to December 31.

### **TCEQ Airport Inspection**

No TCEQ inspections were performed at Dallas Executive Airport during the 2006 permit year.

## II. SCOPE OF THE COMPREHENSIVE SITE COMPLIANCE EVALUATION

The Comprehensive Site Compliance Evaluation was conducted in each operator's lease or contracted work area(s) as well as applicable DOA work areas and associated storm water structural control facilities. The evaluation process consisted of several parts, including:

1. Verification of owner/operator information
2. Confirmation of the accuracy of potential pollutant sources as reported in the SWPPP
3. Review of operator's recordkeeping practices, and
4. Assessment of compliance with terms and conditions of the permit as reflected by operator compliance with the measures and controls contained in the SWPPP.

Initially, operator/leaseholder information was obtained and recorded. This included the name and telephone number of the operator or operator's representative present during the evaluation, leaseholder or subtenant status, and, if a subtenant, the name of the leaseholder's representative present during the evaluation.

The second component of the evaluation confirmed information regarding potential pollutant sources as currently recorded in the SWPPP. The airport operator's industrial activity summary contained in Appendix I of the SWPPP was reviewed and the operator/leasehold site map was revised, if necessary, to reflect any changes in the occurrence of industrial activities.

The third component related to the operator's recordkeeping practices. Important records, such as the operator's TCEQ permit number, certifications, completed self-inspection forms, training records, etc, were to be kept in the SWPPP or referenced elsewhere. A discussion was held with the operator/leaseholder emphasizing the importance of retaining these records in an accessible manner.

The fourth component of the evaluation assessed compliance with permit conditions and is related to the inspection process described in Section VI of the RBD SWPPP. As described in the SWPPP, a two-part inspection process has been implemented in response to the general permit requirements. The first part is an annual self-inspection conducted by the operator. Inspection checklists that pertain to specific industrial activities are to be completed by the operator during the self-inspection process. The Comprehensive Site Compliance Evaluation is the second part of the process, and it follows the completion of the operator's self-inspection.

The inspection checklists are as follows:

- Aircraft, Ground Vehicle, and Equipment Maintenance Areas
- Aircraft, Ground Vehicle, and Equipment Cleaning Areas
- Chemical/Material Storage Areas
- Fueling Activities
- Training Program
- Tenant/Operator Storm Water and Pollution Controls
- DOA Storm Water Structures, Pollution Controls and Sediment Controls
- Dry Weather Evaluations

During the fourth component of the Site Compliance Evaluation, the evaluation team reviewed copies of completed checklists, and a walk-through inspection of the operator's industrial area(s) was performed where adherence to the Best Management Practices (BMPs) was noted. If necessary, a

follow-up inspection was scheduled to review actions taken by the operator to resolve SWPPP compliance issues. The evaluation inspections were also conducted for industrial activities performed in DOA work areas and for airport storm water structural controls.

### **III. RESULTS OF THE COMPREHENSIVE SITE COMPLIANCE EVALUATION**

The evaluation process was conducted from March 26, 2007 to April 23, 2006. It included all operators that were permittees on January 2006, and whose employees or subtenants were performing industrial activities at RBD. Attachment 1 of this report contains a summary of the compliance efforts of airport operators to implement measures and controls contained in the SWPPP. The information presented in this report is based on information obtained from the RBD Comprehensive Site Compliance Evaluation process. The compliance report in Attachment 1 lists the operator under evaluation, the date(s) of the evaluation, PPT personnel conducting the evaluation, major observations relating to implementation of the SWPPP and identification of any incidents of noncompliance. It is to be kept for a minimum of three years from the date of evaluation. The major observations that were noted during the evaluation process are described below.

#### **Aircraft, Vehicle, and Equipment Maintenance Areas**

There were three instances of non-compliance noted for this item during the site assessments of Dallas Executive Airport. Cutter and North Texas Aviation need easily accessible and clearly labeled spill kits in their hangars. Cutter also must train their employees on the proper storage and disposal of oily rags. In all other instances maintenance activities were performed under cover or away from a storm drain where possible. Drip pans were used when necessary, and spill kits were placed in appropriate locations, MSDSs were easily accessible, daily visual inspections were performed, spent rags and wipes were disposed of properly, and temporary berms around drains were used correctly.

#### **Chemical/Material Storage Areas**

There were two instances of non-compliance noted for this item during the on-site inspection of Dallas Executive Airport. KM Aviation was lacking secondary containment for barrels of chemicals and Jet Center of Dallas was storing barrels of waste fuel outdoors with no secondary containment. In all other locations chemicals and materials were stored appropriately, under cover or indoors, and on secondary containment. Most outside dumpsters were kept closed or closed at the end of the business day. Each tenant inspects their property daily.

#### **Spill Control Equipment**

There were no cases of non-compliance for this item documented at Dallas Executive Airport. Spill control equipment is accessible and located appropriately. Disposal of used containment and clean-up materials is handled properly. Spill response and reporting plans are sufficient.

#### **Aircraft, Vehicle and Equipment Wash Area**

No cases of non-compliance for this item were documented during the site investigations at Dallas Executive Airport. Tenants with oil/water separators maintain and inspect the separators appropriately. Washing practices are following the prescribed BMPs.

## **Fueling Activity**

Fueling activity occurs in designated areas by qualified personnel, tenants perform daily visual inspection of equipment, and fueling does not occur within 50 feet of a storm drain. Spill response procedures appear to be adequate. There is one self-fueling station for small aircraft and it is properly maintained and controlled.

## **Training Program**

The following tenants were missing training documentation: Dallas Police Helicopter and KM Aviation. The other tenants have the proper training records, and BMPs are being followed, which indicates that the training has been effective. All of the cases of non-compliance have been recordkeeping and documentation issues.

## **Recordkeeping and Documentation**

The following tenants were missing at least one quarterly checklist: Jet Center of Dallas, KM Aviation, and North Texas Aviation. The following tenants were missing the non-storm water discharge certification: KM Aviation. The only violations at Dallas Executive Airport were paperwork violations, indicating that training should be focused more in this area.

## **Inspection of DOA Storm Water Structural Controls at RBD**

There are several features constructed as part of the airport drainage system that enhance the quality of storm water. The Comprehensive Site Compliance Evaluation included inspection of these structural controls. The existing control measures at RBD consist primarily of grass-lined ditches and swales that serve to decrease the velocity of storm water runoff.

Inspection of the structural storm water controls at Dallas Executive Airport showed the controls to be performing properly.

#### **IV. SIGNIFICANT REVISIONS TO THE SWPPP**

As a result of the implementation of the SWPPP in July, 2003 and the Comprehensive Site Compliance Evaluation performed 2006 permit year, revisions were made to the SWPPP to strengthen its pollution prevention objectives and to make it more user-friendly to the airport operators. Below are descriptions of the most significant revisions that were made to the RBD SWPPP.

##### **Record of Amendments**

A sheet listing all revisions to the SWPPP was developed to assist co-permittees in revising their copies of the SWPPP. A new record of amendments will accompany each set of revisions when approved by the PPT members. The record is to be placed in front of the Plan's table of contents.

##### **Site-Specific Best Management Practices**

Site-specific BMPs have been developed by some of the airport operators to specifically describe pollution prevention procedures to be used only in the operator's lease area. Prior to implementation, each airport operator must submit a description of the BMP to the DOA for written approval. Once approval is received, the operator may implement the site-specific BMP in the operator's lease area. The operator can lose the privilege of implementing site-specific BMPs if the operator does not adhere to the approved procedures.

##### **Recordkeeping and Documentation**

The requirement for tenants to send the Aviation Department copies of all their quarterly inspections throughout the year has been removed. DOA will institute a procedure to e-mail SWPPP participants, reminding them of the necessity to conduct inspections and of checklists timing. This procedure will not relieve the tenant of the responsibility of filling out the appropriate paperwork.

## **V. MAJOR OBSERVATIONS RELATING TO SWPPP IMPLEMENTATION**

Overall, implementation of the SWPPP at RBD by industrial operators appears to be successful. The same can be said for the operator self-inspection process and Comprehensive Site Compliance Evaluation, except as noted. There is still some confusion regarding the annual dry-weather discharge certifications. This issue will be addressed again during the tenant training.

The total number of discrepancies increased from last year. There were five site discrepancies. There was no indication that any soil or water contamination occurred as a result, and the annual sampling report reflected this. However, the number of training documentation and annual dry-weather discharge certification violations decreased from the previous year.