

ANNUAL REPORT

DALLAS LOVE FIELD AIRPORT

June 24, 2004

I. INTRODUCTION

On August 20, 2001, the Texas Commission on Environmental Quality (TCEQ) signed and published the final version of the Texas Pollutant Discharge Elimination System (TPDES) Storm Water Multi-Sector General Permit TXR050000 (TPDES MS General Permit). 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.

Due to issues relating to required signatures on the NOI forms, the Department of Aviation (DOA) has requested and been granted an extension from the TCEQ for the TPDES MS General Permit. At the July 22, 2002 TCEQ meeting in Austin, Texas, the TCEQ indicated they would re-visit the NOI signature requirements. As of this date, the issue has not been resolved.

The DOA and tenants will file an NOI for the TPDES MS General Permit within 30 days of the final permit decision, as required by the extension. Until that time, the DOA and tenants are covered under the NPDES Multi-Sector General Permit. New tenants that were unable to submit an NOI under the NPDES permit due to timing issues are included in this SWPPP and are complying with NPDES permit requirements. On July 1, 2003, DOA and its tenants transferred to the current SWPPP (dated June 2003). This SWPPP replaced the "Dallas Love Field Airport Storm Water Pollution Plan, City of Dallas, Texas" dated September 1996 for DOA 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 DAL site compliance evaluations were conducted by DOA 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 from January 20, 2004 to March 24, 2004. It is to be retained as part of the SWPPP for at least three years from date of evaluation.

The current SWPPP for DAL was made effective on July 1, 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, including site compliance evaluation checklists, are presented as Attachment 1. For the purpose of implementing the SWPPP, the permit year is from January 1 to December 31, and the deicing season from October 1 to March 1, or from the first deicing event if prior to October 1.

TCEQ Airport Inspection (If Applicable)

No TCEQ inspections were performed during the 2003 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, deicing records (if applicable), 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 DAL 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
- Deicing Activities
- 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 January 20, 2004 to March 24, 2004. It included all operators that became co-permittees by July 1, 2003, and whose employees or subtenants were performing industrial activities at DAL. Site Compliance Evaluations and follow-up letters for each tenant, and a summary of the compliance efforts of airport operators to rectify any records deficiencies and/or issues of noncompliance will be filed at DOA with this report. The information presented in this report is based on information obtained from the DAL Comprehensive Site Compliance Evaluation process. The Site Compliance Evaluations 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. These are 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

No instances of non-compliance for this item were documented during field inspections of DAL. Where possible, maintenance activities were not located near storm drain. Tenants used drip pans when necessary, had proper placement of spill kits, had accessibility of MSDS sheets, performed daily visual inspections, had a disposal procedure for spent rags and wipes, and properly used temporary berms around drains.

Chemical/Material Storage Areas

No instances of non-compliance were documented for this item during field inspections of DAL. No inappropriate outdoor storage practices were noted, and metal drums were stored either indoors or under awnings and on secondary containment. Most outside dumpsters were kept closed with latches, and all dumpsters were closed at the end of each business day. Each tenant performs daily visual inspections of their property.

Spill Control Equipment

No instances of non-compliance were documented for this item during field inspections of DAL. Spill control equipment is accessible, and disposal of used spill containment/clean-up materials are consistent with the SWPPP. Spill response and reporting plans are adequate.

Aircraft, Vehicle and Equipment Wash Area

No instances of non-compliance were documented for this item during field inspections of DAL. In all cases washing practices are known and appear to be followed.

Fueling Activity

One instance of non-compliance was documented for this item during field inspections of DAL tenants. Dallas Fire Department #21 has a leak at a fuel dispenser. The tenant was notified to fix the leak, and has taken action to repair the dispenser. In all other cases fueling practices appear to be followed.

Training Program

Airnet Systems, Avis Car Rental, Dollar Car Rental, and Hertz Car Rental are missing formal training documentation. Other tenants have proper documentation of training sessions and training content. BMP's are being followed which shows the training has been effective. The majority of non-compliance issues are in the area of recordkeeping and documentation. This will be addressed at the next City training session scheduled for June 2004.

Aircraft Deicing Activity

Operators who conduct aircraft and/or runway deicing/anti-icing activities are required to periodically re-evaluate present operating procedures. In this way, alternative practices can be considered for reduction of the overall amount of deicing/anti-icing chemicals used and/or lessening of the environmental impact of the pollutant source.

Deicing of aircraft is performed at pre-approved areas a minimum of 50 feet from any storm inlet. These pre-approved areas are identified in deicing plans submitted to the DOA by the tenant each year prior to deicing season. A deicing committee was created to facilitate the development of dry-weather deicing procedures and deicing agent disposal procedures, etc., to be performed at DAL. Tenants are responsible for reporting the type and quantity of products used at the end of each deicing event. Although deicing activities were minimal this year, there were incidents where tenants failed to report total amounts. This issue will be addressed at the next City training session scheduled for June 2004.

Recordkeeping and Documentation

Several tenants were deficient in recordkeeping and documentation. The following tenants were missing at least one quarterly checklist: Airborne Express (3rd quarter), Airnet Systems (3rd and 4th quarter), Avis Car Rental (3rd and 4th quarter), Dallas Fire Department #21 (3rd and 4th quarter), Dallas Fire Department #42 (3rd and 4th quarter), DHL (3rd quarter), Dollar Car Rental (3rd quarter), Express Jet (4th quarter), Hertz Car Rental (3rd quarter), Raytheon (3rd quarter), and Signature Flight Services (3rd quarter). In addition, the following tenants were missing their non-stormwater discharge certification: Allied Aviation, Avis Car Rental, Dollar Car Rental, Express Jet, Hertz Car Rental, Holly Corp., and Signature Flight Services. Telephone calls were made to each of the preceding tenants following the site compliance visits to ensure that their non-stormwater discharge certifications are current. Proper recordkeeping and documentation will be the focus of the June 2004 training sessions in an attempt to decrease the number of future paperwork violations.

Inspection of DOA Storm Water Structural Controls at DAL

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 Love field consist primarily of grass-lined ditches and swales that serve to decrease the velocity of storm water runoff.

Inspection of various control measures at DAL indicate that the structural controls are performing as designed.

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 for the 2003 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 DAL SWPPP. The revised sections are included in Attachment 1.

- Text changes were made in the following sections as outlined in the Record of Amendments, the Preface, Sections II, IV, and V.
- PPT Members were updated.
- Tables P.1, 2.1, 4.3, 4.4, 4.5, 4.6, and 4.7 were updated to reflect the change in tenants
- Individual site maps and chemical inventory lists were checked and updated where necessary.

A meeting was held with the PPT on March 19, 2003. At this meeting, the findings of the Annual Site Compliance Evaluation were discussed. It was the decision of the PPT that the BMPs have been effective and reasonable. Therefore, no changes to the BMPs are needed at this time. More training is needed on the paperwork requirements. This will be addressed at the June 2004 training session.

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.

No additions or changes to the BMPs of the comprehensive SWPPP are needed at this time.

Deicing/Anti-Icing Containment and Collection Procedures

Dry-weather deicing/anti-icing procedures have been developed for DAL. At this time it remains the tenant responsibility to ensure proper dry-weather activities are followed, including proper collection and disposal of any residual fluids. In addition, DOA does period inspections of deicing activities to verify compliance.

Recordkeeping and Documentation

There are no recordkeeping and documentation changes at this time.

V. MAJOR OBSERVATIONS RELATING TO SWPPP IMPLEMENTATION

Overall, implementation of the SWPPP at DAL 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 were no additional compliance issues, inspection confusion, or other items not already addressed in this report.

All but one tenant had only minor paper work violations or were in compliance. The tenant with other than paper violations has made the appropriate corrective actions. There was no evidence of soil/water contamination from this source noted during the site inspections, nor was there any indications reflected in the annual sampling report.

A memorandum will be sent to the City of Dallas when all of the tenants have corrected the deficiencies noted on their annual reviews so that the City can certify that the airport is in compliance with the SWPPP.