

## ANNUAL REPORT

### DALLAS LOVE FIELD AIRPORT

April 23, 2007

#### I. INTRODUCTION

On August 14, 2006, 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. 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 Storm Water Pollution Prevention Plan (SWPPP), dated June 2003. This SWPPP replaced the "Dallas Love Field 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 a year.

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 Love Field (DAL) 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 for 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 DAL was made effective June, 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, and the deicing season from October 1 to March 1, or from the first deicing event if prior to October

### **TCEQ Airport Inspection**

The TCEQ did not inspect Love Field during this permit term.

## 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 March 26, 2007 to April 23, 2007. It included all operators that were permittees on January 2006, and whose employees or subtenants were performing industrial activities at DAL. 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 DAL 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 several occurrences of non-compliance noted for this item during the facility inspections at Dallas Love Field. The following tenants failed to appropriately use drip pans when they were needed: Vitesse, Express Jet, DHL-ABX, Jet Aviation, and COD Field Maintenance. Several tenants are in need of easily accessible and clearly labeled spill kits: Vitesse, Bombardier, DHL-ABX, and Express Jet. In addition there was evidence of previous spills that had not been properly cleaned up in Express Jet's lease area. Right-to-Know stations were unavailable at Trinity Industries and both of the Fire Stations. No other inappropriate practices were noted. In all other instances maintenance activities were located under cover, drip pans were used when needed, spill kits were placed in appropriate locations, MSDSs were accessible by employees, daily visual inspections were performed, proper disposal procedures noted for spent rags and wipes, temporary berms around drains were used properly.

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

There were no cases of non-compliance noted for this item during the facility inspections at Dallas Love Field. No inappropriate storage practices were found, and drums were stored indoors or under cover with secondary containment. Dumpsters were kept closed during business, or closed at the end of the business day. Each tenant performs daily visual inspections of their leasehold area.

#### **Spill Control Equipment**

There were no cases of non-compliance noted for this item during the site inspections at Dallas Love Field. Spill control equipment is accessible, and disposal of used spill containment/clean-up materials are in accordance with the SWPPP. Spill response and reporting plans are sufficient.

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

There were no cases of non-compliance recorded during the site inspections at Dallas Love Field. All permittees are following the proper procedures and BMPs.

## **Fueling Activity**

There were no cases of non-compliance recorded during the site evaluation of Dallas Love Field. All fueling BMPs were followed.

## **Training Program**

The following tenants are missing training documentation: Landmark and Associated Air, Vanguard Car Rental, Vitesse, Express Jet, Hertz Car Rental, Jet Aviation, Airnet Systems, and Regal Aviation. All other tenants have the necessary training documentation recording the date of training and who attended the training.

## **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.

Often, deicing of aircraft is performed at the gates, which may be outside of the operator's leasehold. 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. These procedures are discussed in greater detail in Section V.

There were a few instances throughout the year of deicing fluid not being cleaned up properly after deicing activity was completed. The environmental office of the Aviation Department retains the records that have been submitted.

## **Recordkeeping and Documentation**

There were several deficiencies noted in recordkeeping and documentation. The following tenants were missing at least one quarterly checklist: Airnet Systems, DHL-ABX, Express Jet, and Regal Aviation. The following tenants were missing their non-storm water discharge certifications: Landmark and Associated Air, Vitesse, Express Jet, and Regal Aviation. In addition, Dean Foods could not locate their SWPPP at the time of inspection. The Aviation Department provided Dean Foods with a new copy.

## **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.

The storm water structural controls were inspected at Dallas Love Field, and all are functioning properly. The drainage area at the departure end of runway 31R, that drains into Outfall 4, was rebuilt as part of the Shoulder & Drainage Repair Project.

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

As a result of the Comprehensive Site Compliance Evaluation performed for the 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 DAL SWPPP. The revised sections are located in Appendix 1.

##### **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. No new BMPs have been added. 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 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 is still some confusion regarding the Annual dry-weather discharge certifications. This issue will be addressed again during the tenant training.

The overall number of discrepancies increased from previous years. There was no indication that any soil or water contamination occurred as a result, and the annual sampling report reflected this.