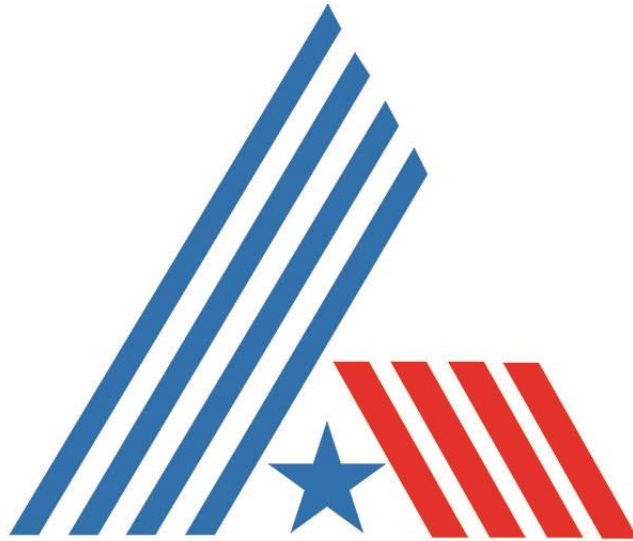


1st Annual City of Abilene Stormwater Industrial Operators Workshop



CITY OF ABILENE

STORMWATER SERVICES



City of Abilene NPDES Industrial & High Risk Runoff Program



Industrial Operators Workshop
Technical Session
May 19, 2016



Srinivas Valavala, B-Tech, MS, MBA, (PhD)
Stormwater Services Administrator



Who are we?

- Stormwater Services within Department of Public Works.
- National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit for City's Municipal Separate Storm Sewer System (MS4) was issued in September 1998.
- Abilene's Stormwater Utility was established in October 2003.
 - To mitigate flooding potential
 - To reduce pollutant runoff and improve water quality
 - To comply with Clean Water Act, Federal, State and Local stormwater regulations



Stormwater Services

We strive to provide the highest quality of work to our customers, both external and internal, to facilitate the overall improvement of Abilene's drainage system and stormwater runoff quality.

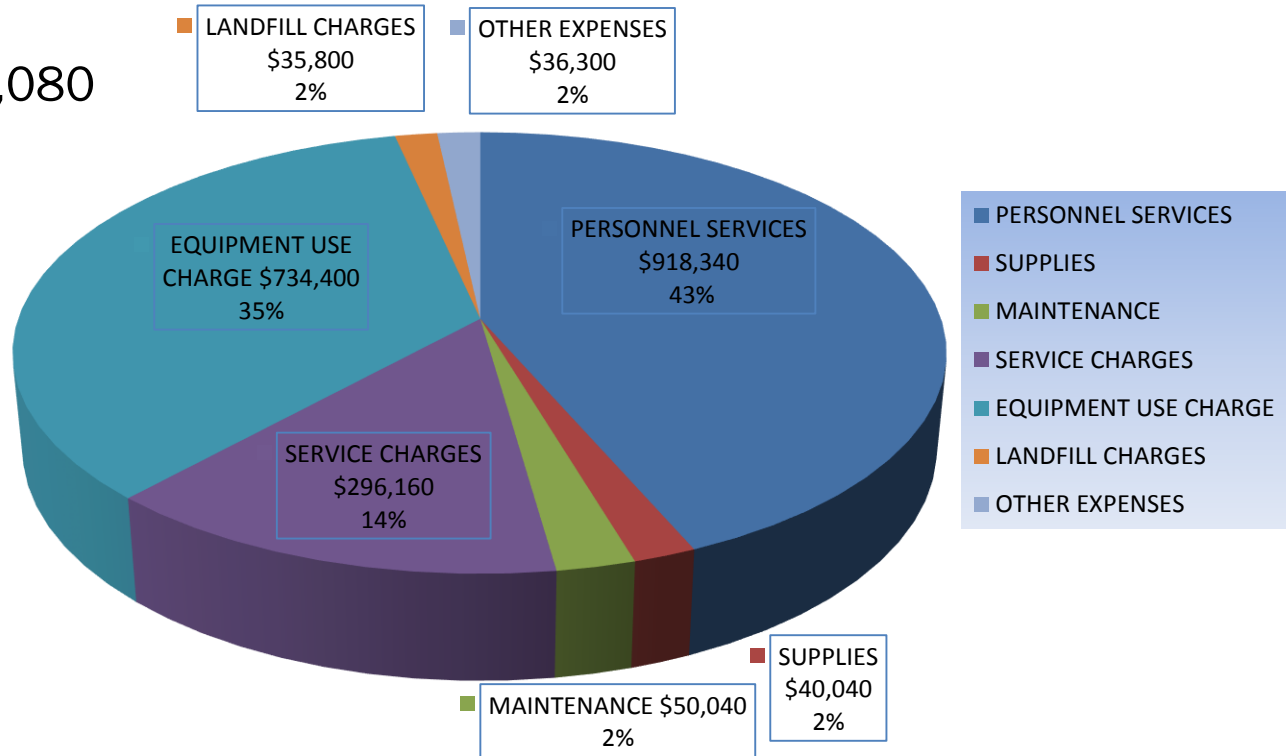
GOALS & OBJECTIVES

- Improve water quality by reducing the introduction of pollutants that enter Abilene's watersheds through stormwater runoff and/or illicit discharges.
- Improve flood prevention by effectively maintaining drainage of local creeks and water conveyances.
- Implement National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) permit and stormwater management plan effectively & efficiently.
- Coordinate with Keep Abilene Beautiful and Division's Stakeholders.



Stormwater Staffing & Budget

- 22 Full Time Staff
- 2016 Budget, \$2,111,080
- Enterprise Fund



Stormwater Permits

- NPDES/TPDES Municipal Separate Storm Sewer System Permit (MS4)
- Construction General Permit (CGP)
- Multi-Sector General Permit (MSGP) – Industrial Stormwater Permit



Industrial Stormwater Discharges in City of Abilene

Are Regulated...

Why ?

- It is LAW. Federal, State and Local...
- To comply with the requirements in stormwater permit.
- To protect City's water resources.

Industrial Stormwater Discharges in City of Abilene

TCEQ, guided by EPA, administers Statewide Texas Pollutant Discharge Elimination System (TPDES) Industrial Stormwater Multi-Sector General Permit (MSGP).

- MSGP authorizes and provides coverage for Stormwater discharges associated with industrial activity under conditions stated in the permit.
- For the state permit's effective implementation, TCEQ included certain features of implementation of MSGP into the City of Abilene's MS4 Permit in form of Minimum Control Measure MCM 5 – Industrial and High Risk Runoff (IHR).
- The City implements IHR control program in compliance with these State's requirements.



Industrial Stormwater Discharges in City of Abilene

- **State** – Texas Commission on Environmental Quality (TCEQ)
- **Local MS4** – City of Abilene (CofA) as a regulated Municipality
- **Co-Permittees** – Texas Department of Transportation (TXDOT). CofA had agreements with TXDOT. Next permit cycle, they have their own permit.
- **Jurisdiction Limits** – City Limits



Industrial Stormwater Discharges in City of Abilene

What is Industrial Discharge and How to Identify ?

- Activities that take place at industrial facilities, such as material production, processing, handling and storage, are often exposed to atmospheric conditions like rain, snow, sleet and wind.
- Currently qualified under Standard Industrial Code (SIC).
- Sector based (**future permit...**)
 - Sector A: Timber Products
 - Sector B: Paper and Allied Products
 - Sector C: Chemical and Allied Products etc...



Industrial Stormwater Discharges in City of Abilene

Specific to Site,

Who is Responsible for Discharges ?

- Industrial Operator
- Industrial “operator” is commonly defined as:
 - Person with control over industry
 - Person with day-to-day control of industrial operations
 - Usually the owner, or Manager

Minimum Control Measure 5: City's Industrial Program Main Components

- Local **ordinance** specifying legal authority, BMP requirements, operation, penalties for non-compliance
- **Inventory** of industrial sites with relevant information and inspection tracking
- **Inspection** process, procedures, guidance and checklists
- Enforcement mechanisms in-place
- Prioritization of industrial sites (e.g. proximity to impaired water bodies etc.)
- Public Education and Awareness
- Training of staff
- **Outreach** to industrial operators, engineers etc.
- Record Keeping of inspections and enforcement

City of Abilene Industrial and High Risk Runoff (IHR) Control Program

Goal of IHR Program: To reduce the amount of offsite stormwater runoff impacts and enhance the quality of runoff that discharges from industrial and high risk facilities.

Main Components of City's IHR Program Include:

- Ordinance
- Inventory
- Inspections
- Outreach



City of Abilene Industrial and High Risk Runoff (IHR) Control Program

- **Ordinance** - Ordinance is in place for City of Abilene to perform inspections and enforce as deemed necessary.
- Inventory
- Inspections
- Outreach

Ordinance Mechanism

In Place

- Ordinance – Chapter 32 - Article VII– Sec 160 through Sec 369
- Enforcement mechanism – Voluntary Compliance, Stop Orders, Penalties, Appeals
- Access to Facilities
- Inspection Guidelines & Procedures
- Comprehensive Program

A copy of the ordinance and guidelines are available on City's stormwater website for reference.

City of Abilene Industrial and High Risk Runoff (IHR) Control Program

- Ordinance
- **Inventory** - The City maintains database of industrial and high risk facilities that discharge into MS4.
- Inspections
- Outreach

Inventory Lists

Two types of facilities in database

1. **Industrial Facilities**- Industrial facilities that have a SIC code and qualify under statewide permit (Stormwater Discharges Associated with Industrial Activity that need implementation of SWPPP).
2. **High-risk Runoff Facilities** – Hotspots or High risk runoff facilities that qualify under City of Abilene NPDES Permit that has potential for Illicit Discharges (Coverage and SWPPP not needed).



1. Industrial Facilities

Industrial facilities requires -

- NPDES permitting and coverage
- Notice of Intent (NOI) submitted
- Stormwater Pollution Prevention Plan (SWPPP) maintained.
- Wide range of requirements



NPDES Industrial **Permitting** for Stormwater Discharges in City of Abilene

- Notice of Intent (NOI) for Stormwater Discharges Associated with Industrial Activity Application
 - NOI Form & Compliance
- Stormwater Pollution Prevention Plan
- Inspections by Site Operators
 - NPDES stormwater industrial regular Inspections
 - NPDES stormwater industrial compliance evaluation Report
- Inspections by CofA Inspectors
 - NPDES Stormwater Industrial Compliance Inspection Report by City Inspectors
 - QA/QC of City Inspector by Management
- Notice of Termination (NOT)
 - NOT form
- No Exposure Certificate (NEC)

Ms. Polly Porter will discuss more about the state permit requirements in her presentation.



NPDES Industrial **Permitting** for Stormwater Discharges in City of Abilene

* All model forms/checklists/guidelines/assistance tools are available on the City's website

@ <http://abilenetx.com/city-hall/departments/public-works/stormwater-services/industrial-facility-inspection-program>

➤ GIS layer is created with all the facilities

➤ Real-time App - <http://data.abilene.opendata.arcgis.com/>



2. High-risk Runoff Facilities

- Closed Municipal landfills
- Storage & disposal facilities
- Municipal Facilities
- Municipal Operations
- Potential pollution hotspot discharges such as
 - Repair Shops
 - Junk Yards
 - Shopping Mall Parking Areas etc...

City of Abilene Industrial and High Risk Runoff (IHR) Control Program

- Ordinance
- Inventory
- **Inspections** - The program calls for inspections for all the facilities identified in the inventory. City has standard operating procedures, checklists, follow up procedures in place.
- Outreach

Inspections

- Stormwater Services does inspections for both Industrial and High-risk runoff facilities.
- State performs inspections on industrial category sites, as needed.
- Goal is to inspect entire inventory during course of five year permit cycle.

Inspections

- Qualified trained personnel will conduct inspections.
- Inspection focuses on overall effectiveness of the facility's stormwater management practices.
- Evaluates impacts to stormwater from industrial activities.



Prioritization for Inspections

Prioritized in-order of:

- Pollutants of Concern
- Distance to a Water Body
- Type of Permit (NOI/NEC)
- Violation History
- Priority
 - High
 - Medium
 - Low
- For unknown parameters, inspection helps in prioritizing for next cycle of inspections.

Protocol Before Inspection

- Make initial contact.
- Identify point of contact for the facility.
- Schedule inspection date and time with the facility POC.
- Identify Personal Protective Equipment (PPE) needed for site inspection.
- Provide the facility POC a verbal overview of the inspection purpose, process and stormwater ordinance.
- Ordinance copy can be requested and obtained.

During Inspection

City personnel visually examines and documents targeted facility's:

- SWPPP if required and associated in-house inspections logs, checklists, training, pollution prevention team, compliance evaluation reports etc...
- Material and storage areas
- Facility's grounds and operations
- Retention/detention ponds and any stormwater controls
- Outdoor activities
- Stormwater drainage controls
- Assessment of Housekeeping Practices
- Potential pollutant sources and stormwater impacts
- Environment in stormwater discharge vicinity
- Illicit discharges etc...
- Spill response equipment



Jesse Torres will discuss more about the inspections and what he looks for during an inspection in his presentation.

Documents to Retain Onsite for Stormwater Inspector to Check while Inspection

From date of NOI approval to date of NOT/No exposure approval, the following documents should be retained onsite.

- Copy of Permit
- Copy of SWPPP, if required
- Proof of documentation for Implementation of SWPPP
- In-house inspections sheets, visual monitoring reports, evaluation reports etc...
- Training documentation

Closing/Follow-Up Inspections

- Provide the facility contact with preliminary findings of inspection.
- Provide inspection status “satisfactory” or “unsatisfactory”
 - If satisfactory – no action needed.
 - If unsatisfactory inspector will discuss the deficiencies and corrective action.
- Issues Exit Interview Form (EIF) with corrective action plan, depending on the severity of the violations.
- Voluntary Compliance



Corrective Action & Enforcement Escalation

- If not complied voluntarily, inspector will discuss the deficiencies and corrective action through Notice of Violation (NOV).
- If there is significant pollutant load to City MS4, an Citation can be issued.
- The NOV identifies the requirements of Stormwater ordinance and required IHR facility to take all reasonable steps to minimize/prevent discharge of pollutants.
- Follow up inspections conducted.



Self Monitoring

- The City requires IHR facility to conduct self monitoring if pollutants identified.
- Sampling parameters depends on pollutant loads/concerns.
- Industry related pollutant or that identifies in discharge.
- Analysis of samples should be performed by TCEQ certified lab.
- Self monitoring facility submit their reports to the City.

City of Abilene Industrial and High Risk Runoff (IHR) Control Program

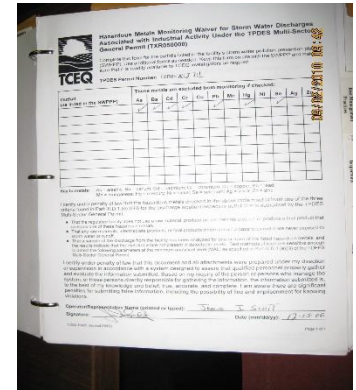
- Ordinance
- Inventory
- Inspections
- **Outreach** - Public Education, Awareness and Staff Training.

Outreach

- Providing outreach in stormwater related events in the community in association with Keep Abilene Beautiful.
- Conducts outreach during inspection.
- Industrial workshop with our customers.
- Training materials and tools required are available on City's website.
- Train staff and inspectors to stay current on requirements.
- Brochures, fact sheets and outreach materials.

Responsibilities of Industrial Facility Operator

- Submit NOI along with fees to TCEQ, if qualified under SIC code
- Prepare SWPPP and comply MSGP requirements
- Notify and provide a copy of NOI to the City
- Maintain/Implement SWPPP effectively
- Perform In-house inspections
- **Document, Document, and Document...**
- Keep SWPPP book up-to-date
- Maintain facility effectively with minimum stormwater impacts and no off-site impact
- Be aware of potential stormwater pollution and apply BMPs as necessary
- Consider NOT and NEC



Responsibilities of City of Abilene

- To maintain our industrial database up-to-date.
- To Inspect industrial sites to ensure compliance at least once in a five year permit cycle. Address any potential violations.
- Inspections of site for potential stormwater pollution hotspots.
- To ensure BMP measures and corrective actions taken to protect water quality.
- To provide better outreach for industrial operators for a better understanding of the requirements.
- To offer training to the City Staff to keep up with regulations and enhance program, quality of inspections and enforcement.
- To be in compliance with TCEQ's delegated IHR Program.
- To report findings to TCEQ on a regular basis.



Responsibilities of TCEQ

- To process in a timely manner:
 - NOI
 - NOT
 - NEC

- Conduct State inspections as needed.

- Maintain communication with local municipality.

Compliance

- **Win-Win-Win** Scenario.
- City's water quality compliance is dependent on industrial operators compliance.

Why Should We Care?

Clean water is crucial to the continued vitality of our community.

Our community deserves — and demands — clean water.

Polluted runoff is a threat. If left unchecked, it WILL negatively impact our community and our standard of living.

If you find a problem, call City of Abilene watchdog...

Stormwater Services



Local City of Abilene Stormwater Watchdog

Stormwater Hotline No: 325-676-6281

Visit us @ www.abilenestormwater.com

Can write to Abilene411 @

http://mygovhelp.com/ABILENETX/_cs/CustomerHome.aspx

<http://abilenetx.com/how-do-i#report>



**Our Water, Our Environment
Our Responsibility!**

Thank You!

