

## **6.0 COMPREHENSIVE SITE COMPLIANCE EVALUATIONS**

### **6.1 Description and General Requirements**

The TPDES MS General Permit requires that qualified personnel conduct a comprehensive site compliance evaluation at least once a year. The comprehensive site compliance evaluation inspection team consists of members of the PPT. The members of the PPT are listed in *Section 2* of this report. Such evaluation shall cover the following:

- Inspection of all areas identified in *Section 4.1* Inventory of Exposed Materials of this report.
- Inspection of all structural controls, including the maintenance and effectiveness.
- Inspection of all non-structural controls including BMP effectiveness, good housekeeping measures, and spill prevention.
- Inspection of all reasonably accessible areas immediately downstream of the major storm water outfalls that are authorized under the TPDES MS General Permit.
- A review of all records required by the TPDES MS General Permit.

### **6.2 Annual Report**

A report summarizing the scope of the evaluation, personnel performing the evaluation, the date(s) of the evaluation, major observations relating to the implementation of the SWPPP, and revisions and implementation of revisions to the SWPPP as described above shall be made and retained as part of the SWPPP. This report will be titled “Annual Report,” and will be held in *Appendix H* or referenced elsewhere for the term of the permit. It will be made readily available for inspection and review by authorized TCEQ personnel upon request.

The report shall also identify any incidents of noncompliance. Where a report does not identify any incidents of noncompliance, the report shall contain a certification that the facility is in compliance with the SWPPP and the TPDES MS General Permit. If the report indicates an incident of non-compliance, the operator shall complete all necessary actions to come into compliance as soon as practicable, but no later than 12 weeks following the evaluation.

### **6.3 Revisions of the SWPPP**

The SWPPP shall be revised to include and address the findings of the Annual Report. Changes to the SWPPP shall be made within 30 days after the completion of the evaluation. Revisions must include all applicable changes that result from the comprehensive Annual Report and all applicable updates to the following:

- Elements of the SWPPP that require modifications for effectiveness
- Any additional elements that should be added or modified for the prevention of pollution
- The site map(s)
- The inventory of exposed materials
- The description of the good housekeeping measures
- The description of structural and non-structural controls
- Any other element of the plan that was either found to be inaccurate or that will be modified

In summary, the objectives of the comprehensive site compliance evaluation are as follows:

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

### **6.4 Scope of the Annual Report**

Based on these permit requirements, the Comprehensive Site Compliance Evaluation for RBD includes the following scope and content:

- Evaluate the effectiveness of measures to reduce pollutant loading and whether additional measures are needed.
- Review the inspection records and checklists of tenant and DOA facilities described in the SWPPP inspection process in *Section 5.8*. Conduct visual inspection at sites to identify problem areas with deficiencies or non-compliance.

- Inspect equipment necessary for program implementation, such as spill control equipment.
- Inspect for pollutants entering the airport storm water discharge system:
  - Conduct ground surface inspection of inlets for stains or evidence of improper disposal or dumping. Note any odors detected at the inlets. If fuel smells are detected, any material present in the inlet shall be removed and disposed of properly. If material other than fuel is suspected, a grab sample from the inlet may be taken for analysis.
  - Inspect major storm sewer outfalls leaving airport and the adjacent channel for stains or evidence of improper disposal or dumping of contaminants, or for unnatural odors.
- Address the results of the above site evaluations during a Storm Water Pollution Prevention Team meeting. The PPT will evaluate the effectiveness of the existing measures to reduce pollutant loadings and determine whether additional measures are needed.
- Based on the PPT's findings, a draft copy of changes to the SWPPP relating to potential pollutant source descriptions in tenant areas will be available as needed within two weeks of completion of the comprehensive site compliance evaluation.
- Revisions relate to the potential pollutant source descriptions and pollution prevention measures and controls. Implementation as a result of revisions to the SWPPP shall occur within 12 weeks of the comprehensive site compliance evaluation.
- Prepare a report summarizing the scope of the comprehensive site compliance inspection, evaluation results and follow-up actions; the date of inspections and names of personnel in attendance; identification of any incidents of non-compliance or certification that the facility is in compliance with the SWPPP.
  - All incidents of noncompliance shall be documented in the site compliance inspection and evaluation report.
  - If there are no incidents of noncompliance, the report shall contain a certification that the facility is in compliance with the SWPPP.
  - The completion date of the annual report will be no later than December 31 of each year.