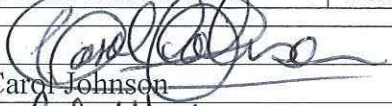
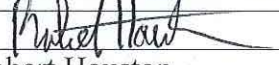


**Region 6 Compliance Assurance and Enforcement Division
sMS4 PRE-ASSESSMENT REPORT**

Inspection Date(s):	04/18/2018		
Media:	Water		
Regulatory Program(s)	CWA Storm Water		
Company Name:	City of Dalworthington Gardens		
Facility Name:	City of Dalworthington Gardens		
Facility Physical Location:	2600 Roosevelt Dr.		
(city, state, zip code)	Dalworthington, TX 76016		
Mailing address:	2600 Roosevelt Dr.		
(city, state, zip code)	Dalworthington, TX 76016		
County/Parish:	Tarrant		
Facility Contact:	Sherry Roberts	City Administrator	
	(682) 330-7419		
FRS Number:	N/A		
Identification/Permit Number:	TXR040598		
Media Number:	N/A		
NAICS:	237110		
SIC:	1623		
Personnel participating in inspection:			
Carol Johnson	6EN-WS	Life Scientist	(214) 665-8471
Stephanie Meyers	6EN-WS	Life Scientist	(214) 665-6496
Linda Smith	6EN-WS	Environmental Protection Specialist	(214) 665-6641
Sherry Roberts	City of Dalworthington Gardens	City Administrator	(682) 330-7419
Scarlett Dinh	Westra Consultants	Consultant	(817) 715-8848
Ragu Rao	Westra Consultants	Consultant	(817) 230-4149
Jeff Chasteen	City of Dalworthington	Inspector	(682) 774-7506
Gary Harsley	City of Dalworthington	Inspector	(682) 333-4753
Erika Nordstrom	Westra Consultants	Consultant	(817) 230-4777
EPA Lead Inspector Signature/Date	 Carol Johnson		5/03/2018 Date
Supervisor Signature/Date	 Robert Houston		5/3/2018 Date

Section I – INTRODUCTION

EPA Region 6 inspectors Carol Johnson, Stephanie Meyers and Linda Smith arrived at the City of Dalworthington Gardens (the City) City Hall at 9:00am on April 18, 2018, for an announced Pre-Assessment. We met with City Administrator Sherry Roberts, City Inspectors Jeff Chasteen and Gary Harsley, and Westra Consultants Erika Nordstrom, Ragu Rao and Scarlett Dinh. Carol Johnson informed the attendees that this was an EPA Pre-Assessment to determine compliance with the City's TPDES Small Municipal Separate Storm Sewer System (MS4) Phase II Permit and the Clean Water Act. The Pre-Assessment was conducted under the authority of the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the Federal Clean Water Act.

PURPOSE OF THE INSPECTION

The purpose of this Pre-Assessment and Inspection is to evaluate the permit compliance of the municipality with its Phase II MS4 Storm Water permit and prioritize their Storm Water Management Plan (SWMP) for a comprehensive assessment either by EPA or the permitting and enforcement authority.

FACILITY DESCRIPTION

The City of Dalworthington Gardens is a Phase II MS4 that discharges to surface waters of the United States. The City is responsible for compliance with permit conditions relating to discharges from portions of the MS4 for which it is the operator, and SWMP implementation on portions of the MS4 for which it is the operator.

Section II - OBSERVATIONS

This Pre-Assessment evaluated how the City has implemented key Control Measures of its SWMP: Construction Site Runoff, Post-Construction Site Runoff, Illicit Discharge Detection and Elimination, Municipal Good Housekeeping, Industrial facilities; and other subjects that included data management, inspection schedules, citizen complaints, enforcement actions, and green infrastructure projects. The EPA team also conducted a review of the City's Construction inspections at a road improvement linear construction site, and conducted a walk-through of the Equipment Service Center.

At the Equipment Service Center all service activities were being conducted under cover, and no discharges or potential discharges were observed. There were spill kits and absorbent material properly marked and available in the maintenance area. Overall, the service center appeared to be relatively clean and well-organized, and good housekeeping practices were being adequately implemented.

At the road improvement construction site, EPA reviewed the site with the City's Construction Inspector, Gary Harsley, and was able to observe his inspection techniques as he walked us through how he conducts his construction Storm Water inspections. Overall, the Inspector's techniques appeared to be thorough and detailed, and the site appeared to be in good condition.

Section III – AREAS OF CONCERN

No Areas of Concern were observed at this time, however the EPA team did advise that the City needed to update their data management system to better track inspections, violations, enforcement actions and complaints. Currently the City's data management is all paperwork-based, making it difficult to track and find specific inspections, or enforcement actions, etc. Erika Nordstrom with Westra Consultants said they are currently in the process of creating such a database for the City.

Section IV – FOLLOW UP

No information was received by EPA after exiting the facility on April 18, 2018.

Section V – LIST OF APPENDICES

Appendix 1: Photo log

Appendix 2: Sign-in Sheet

Appendix 3: Pre-Assessment Overview

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 2600 Roosevelt Dr.		
City: Dalworthington Gardens	County/Parish: Tarrant	State: TX



Photo File Name: DSCN3383.jpg

Date of Photo: 04/18/2018

Photographer: Carol Johnson

Description: Municipal Equipment Service Center.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 2600 Roosevelt Dr.		
City: Dalworthington Gardens	County/Parish: Tarrant	State: TX

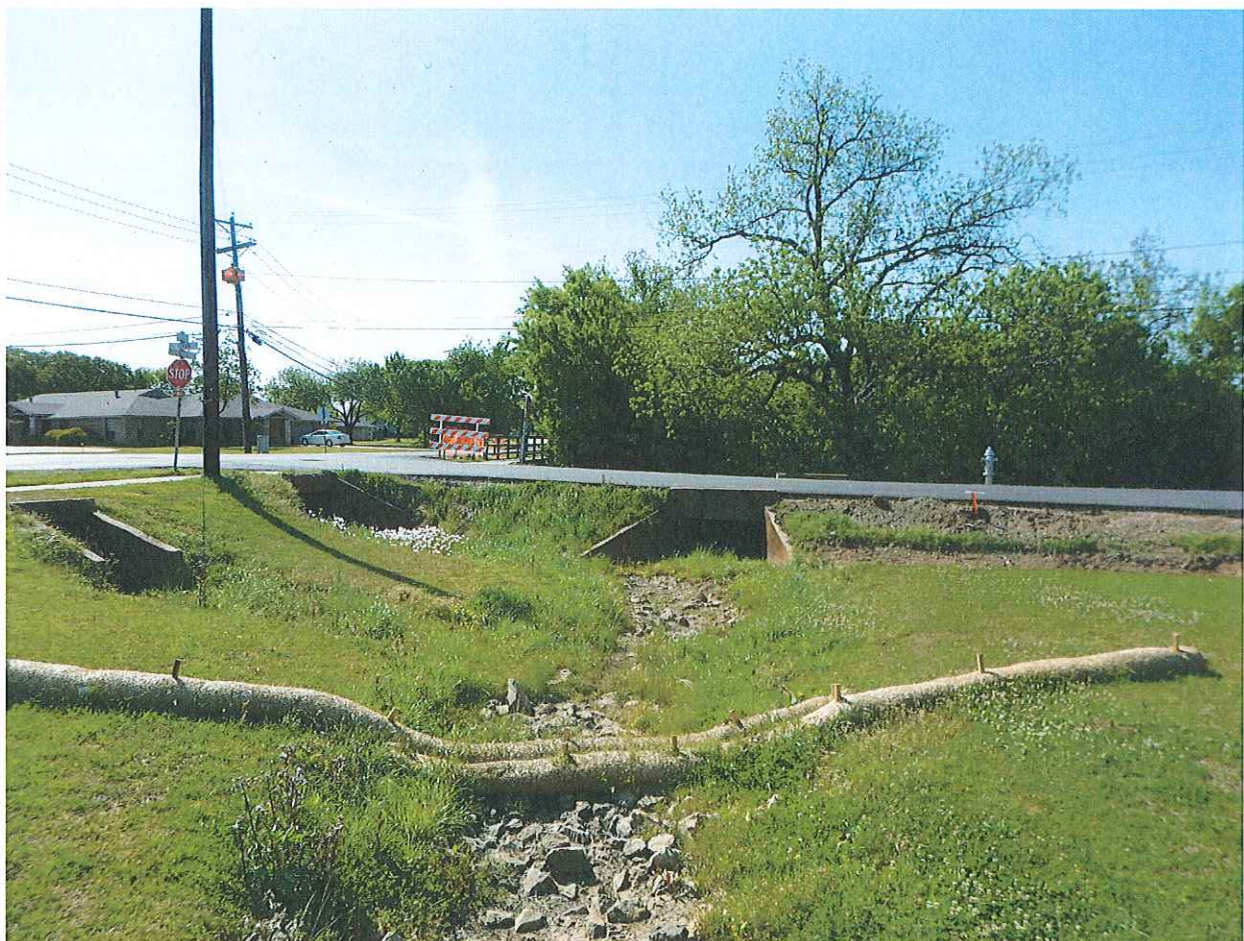


Photo File Name: DSCN3417.jpg

Date of Photo: 04/18/2018

Photographer: Carol Johnson

Description: California Lane road Construction site.

Appendix 2

Sign-in Sheet



CITY OF Salisbury PRE-ASSESSMENT SIGN IN - Address, Meeting Time and Date

Caroline 4/18/18 9:00am

NAME AND TITLE (Print)	SIGNATURE	EMAIL	PHONE	COMPANY
Carol Johnson EPA - Enforcement Officer		Johnson-carol@epa.gov	(214) 665-3471	EPA
Linda Smith EPA - Enforcement Officer		Smith.linda@epa.gov	(214) 665-6641	Region 6 EPA
Stephane Meyers EPA - Enforcement Officer		meyers.stephane@epa.gov	214-665-6496	EPA R6
Scarlett Dink Westra - EIT		sdink@westraconsultants.com	817-715-8848	Westra
Ragu Rao Westra		rao@westraconsultants.com	817-230-4149	Westra
Sherry Roberts City Administrator		sroberts@cityofdug.net	(903) 736-0270 cell	CITY OF DUG
Thawn Krenn Public Services		SKRENN@CITYOFDUG.net	682-215-0205	CITY OF DUG
Jeff Chasteen Public Works		jeffchasteen@cityofdug.net jchasteen@cityofdug.net	682-774-7506	DUG
Gary Harshley Inspector		gharshley@cityofdug.net	682-333-4753	DUG
Kerka Nordstrom Westra		KNordstrom@westraconsultants.com	817-230-4177	Westra



NAME AND TITLE (Print)	SIGNATURE	EMAIL	PHONE	COMPANY

A blue line graph is plotted on a grid. The line starts at the top left, slopes downwards to the right, and continues towards the bottom right. In the center of the line, there is a cluster of several small, overlapping loops or swirls, possibly representing a specific data point or a feature of the graph. The grid consists of 10 vertical columns and 10 horizontal rows.

Appendix 3

Pre-Assessment Overview



United States Environmental Protection Agency
Dallas, Texas 75202-2733

sMS4 STORM WATER PRE-ASSESSMENT OVERVIEW

Section A: Coding

Name of sMS4:	City of Dalworthington Gardens		Permit Number:	TXR040598	
Permit Issuance Date:	11-24-2015	Permit Effective Date:	11-24-2015	Permit Expiration	12-13-2018
Latitude:	32.69881	Longitude:	-97.15553	Population:	2,383 (2016)
Pre-Assessment Date:	04-18-2018	sMS4 Inspection Date:	04-18-2018	Observation Date	04-18-2018

Section B: sMS4 Data

Address, City, State, Zip code 2600 Roosevelt Dr. Dalworthington Gardens, TX 76016		Arrival Time/Date 9:00 AM / 04-18-2018
		Exit Time/Date 1:00 PM / 04-18-2018
Name of Storm Water Director Sherry Roberts	Title(s) City Administrator	Phone Numbers (682) 330-7419
Name, Address of Storm Water Director Sherry Roberts, 2600 Roosevelt Dr., Dalworthington Gardens, TX 76016		

Section C: Areas Evaluated in the In-Office Presentation

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated, NA = Not Applicable)

S	SWMP fully developed	S	Illicit Discharge Detection and Elimination program
S	SWMP Management trained and job duties assigned	S	Municipal Good Housekeeping program
S	Construction Site Runoff program	S	Inspection schedule established for applicable Control Measures
S	Post-Construction Site Runoff program	S	Public Education, Outreach and Participation
S	Enforcement Actions	M	Data Management
NA	Inspection of Industrial facilities (<i>Texas MS4s only</i>)	S	Structural Controls/Green Infrastructures/Pollutant Reduction Projects

Section D: Areas Evaluated in the MS4 Facility Inspection (Attach completed inspection part of Checklist)

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	SWPPP, SOP, Management Guidelines or Good Housekeeping Manual in place	S	Trained Staff (emergency spill response, storm water)
S	Spill Kit	S	Facility inspection and clean up schedule
NA	Fueling Station	S	Trash bins and disposal areas
S	Vehicle Wash area	S	Outfalls
S	Storage Bins	S	Training programs
S	Vehicle Maintenance area	S	Construction projects on site are permitted and an SWPPP is in place

Section E: Areas Evaluated during observation of inspection technique

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

The Observation found that the sMS4 Inspector:

S	Uses an Inspection form	S	Checks inspection reports for completion: date, findings, corrections and signature
S	Operates on-site a computer connected to home database	S	Notifies operator about areas of concern
S	Determines that a SWPPP is on site	M	Files the completed inspection report in a database
S	Determines NOI submitted or Permit on site	S	Follows-up with the operator about areas of concern
S	Checks for storm water discharges	S	Presents credentials
S	Checks storm water conveyances for protective covers	S	Authorized to take enforcement action
S	Checks frequency of inspections	S	Provides storm water information to the operator

No Areas of Concern were observed at this time, however the EPA team did advise that the City needed to update their data management system to better track inspections, violations, enforcement actions and complaints. Currently the City's data management is all paperwork-based, making it difficult to track and find specific inspections, or enforcement actions, etc. Erika Nordstrom with Westra Consultants said they are currently in the process of creating such a database for the City.