

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	May 15, 2024	
Time	Entry: 1:00 PM	Exit: 2:10 PM
Weather Conditions	80°F and Sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Best Route, Inc.	
Facility or Site Name:	Best Route, Inc.	
Permit ID or Tracking #:	N/A; No permit at the time of the inspection	
SIC Code:	SIC Code 4226-15 – Truck Trailer-Parking & Storage or SIC Code 7538 – General Automotive Repair Shops.	
Facility Address:	2100 Peachtree Road	
(city, state, zip code)	Balch Springs, TX 75180	
Geographic Coordinates:	32.741306°, -96.631163°	
Mailing address:	2100 Peachtree Road	
(city, state, zip code)	Balch Springs, TX 75180	
County:	Dallas County	
Regular Days/Hours of Operation:	Days and hours of operation were not listed online	
# of Employees at location:	Approximately 4	
Size of Facility (in acres):	Approximately 6.3 acres in total	
Receiving Water(s):	Hickory Creek borders the east of the Facility	
Date facility est. @ location:	1985	
Onsite Representatives:		
Name: Craig Harrison	Title: Owner	Phone: (214) 934-9830
	Email: gharrison@chtransportation.net	
Authorized Official:	Contacted? ☒ Yes ☐ No	
Name: Craig Harrison	Title: Owner	Phone: (214) 934-9830
	Email: gharrison@chtransportation.net	
Additional Personnel Participating in Inspection:		
Name: N/A	Title: N/A	
Inspector(s):	Title:	Company:
Christopher Pardo	Lead Inspector	Eastern Research Group, Inc.
Ryan Marrero-Vila	Inspector	Eastern Research Group, Inc.
Ivy Koberlein	Inspector	Environmental Protection Agency, Headquarters
Sharron Crayton	Inspector	Environmental Protection Agency, Region 6
Carol Johnson	Inspector	Environmental Protection Agency, Region 6
Destinee Agwuna	Inspector	Environmental Protection Agency, Region 6
Inspection Report Author:		
Name: Christopher Pardo	Signature: CPardo	Date: June 17, 2024
Supervisor Review:		

Name:	Signature:	Date: 07/12/2024
Chelsey Sherwood (Acting for Ruben Alayon-Gonzalez)	CHELSEY SHERWOOD Sherwood signed by CHELSEY Date: 2024.07.12 12:27:57 -0500	

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the Clean Water Act (CWA) and its implementing regulations found at 40 Code of Federal Regulations (CFR) Part 122.26. The inspection was unannounced and consisted of interviewing Facility representatives, recording field observations, and taking photographs to document site conditions throughout the Facility at the time of the inspection.

Opening Conference

- 1) Brief narrative documenting those present, introductions, presentation of credentials, and explanation of the purpose of the inspection.

On May 15, 2024, a U.S. Environmental Protection Agency (EPA) contractor, Eastern Research Group, Inc. (ERG), conducted an industrial stormwater non-filer inspection at Best Route, Inc. located in Balch Springs, Texas (Facility). Ivy Koberlein of EPA Headquarters, Sharron Crayton, Carol Johnson, and Destinee Agwuna of EPA Region 6, and Chris Pardo and Ryan Marrero-Vila of ERG (collectively, EPA Inspection Team) met with the Facility representative, Craig Harrison. The EPA Inspection Team presented their credentials and explained that it was EPA's understanding that the Facility did not have an industrial stormwater permit. The EPA Inspection Team explained they were onsite to conduct a Clean Water Act stormwater inspection, which includes observing the current operations of the facility and assessing the potential for stormwater discharges from the Facility.

The weather at the time of the inspection was sunny and approximately 82°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA)¹, the Balch Springs, Texas area received 0.01 inches of rain the day prior to the inspection and no precipitation the day of the inspection.

- 2) Credentials presented to: Craig Harrison (Owner)
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements?
☐ Yes ☒ No Describe: N/A
- 4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements? ☐ Yes ☒ No Describe: N/A

¹Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

FACILITY'S OPERATION & PRODUCT DESCRIPTION
Description of business and industrial activities occurring throughout the site. (Include operator's description and note any documentation that further establishes SIC code (permit applications, reports, business registries, website...)). Best Route, Inc. is a commercial truck repair shop and month to month semi-truck storage yard. According to the Facility representative, the Facility conducts truck maintenance inside the warehouse on the western portion of the Facility [refer to <u>Appendix B, Photograph Log (Photographs 93 and 94)</u>]. The outdoor portion of the Facility is a semi-truck storage yard with approximately 100 spaces that are leased to individual truck drivers [refer to <u>Appendix B, Photograph Log (Photographs 11-13, 26, and 27)</u>]. Based on visual observations, tenant truck drivers perform their own vehicle maintenance and store vehicle maintenance fluids, vehicle parts, chemical waste(s), and other materials uncovered and onsite, on or near their respective lots [refer to <u>Appendix B, Photograph Log (Photographs 17-23, 28-31, 33, 34, 38, 52-54, 57, 59, 67, 74-78, and 91)</u>]. The EPA inspection team observed a dismantled truck [refer to <u>Appendix B, Photograph Log (Photograph 35)</u>], auctioned cars [refer to <u>Appendix B, Photograph Log (Photographs 9 and 10)</u>], and piles of aggregates/sediments being stored throughout the truck storage yard [refer to <u>Appendix B, Photograph Log (Photograph 88)</u>]. The EPA Inspection Team observed the Facility generally sloped east/southeast towards Discharge Point #1 at the southeastern corner of the Facility, however, the northern boundary of the Facility sloped northeast towards the low lying wooded area which bordered the Facility's northern/northeastern sides. The EPA Inspection Team observed the potential for pollutants present outside throughout the truck storage yard (i.e., used motor vehicle oil, concrete waste, oil and grease, hydraulic fluid, and rusting scrap metal parts) to be mobilized in stormwater and discharge east towards Hickory Creek. Other industrial facilities owned/operated by same business entity ☐ Yes ☒ No Describe: N/A

SECTION II – OBSERVATIONS

SITE EVALUATION	
Pollutant Sources	Note location, quantity/size, design issues, any operation and maintenance (O&M) deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are Best Management Practices (BMPs) in place to minimize or eliminate stormwater discharges from industrial activities?
Loading/Unloading Operations	The EPA Inspection Team did not observe bulk loading/unloading of industrial materials.
Industrial Manufacturing/Processing Operations	The EPA Inspection Team observed one (1) partially dismantled commercial truck on the northern portion of the truck storage yard [refer to <u>Appendix B, Photograph Log (Photograph 35)</u>].

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Industrial Machinery & Equipment Storage	The EPA Inspection Team observed approximately 100 semi-trucks parked/stored outside on the gravel parking lot along both the northern and southern boundaries of the Facility. [refer to <u>Appendix B, Photograph Log (Photographs 11-13, 26, and 27)</u>]. The EPA Inspection Team observed one (1) out-of-service forklift stored in the eastern portion of the truck storage yard. Petroleum staining was observed on the gravel surface underneath the forklift [refer to <u>Appendix B, Photograph Log (Photographs 72 and 73)</u>]. The EPA Inspection Team observed one (1) inoperable riding lawn mower stored in the southeastern corner of the truck storage yard [refer to <u>Appendix B, Photograph Log (Photograph 61)</u>].
Storage of Industrial Materials or Products	The EPA Inspection Team observed approximately fourteen (14) large industrial freezers stored outside in the northwestern corner of the truck storage yard.
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The EPA Inspection Team observed a used motor oil storage station inside the Facility's truck repair/maintenance warehouse [refer to <u>Appendix B, Photograph Log (Photographs 93 and 94)</u>]. The accumulation station consisted of one (1) 300-gallon aboveground storage tank (AST), seven (7) 55-gallon drums, and approximately eleven (11) smaller pans/buckets full of used motor vehicle oil. Additionally, one (1) 500-gallon AST containing unused motor oil was present in the warehouse. The EPA Inspection Team observed, in total, approximately twenty (20) 5-gallon buckets, one (1) 300-gallon intermediate bulk container (IBC) tote tank, and other miscellaneous liquid storage containers across all portions of the outdoor truck storage yard. These liquid storage vessels contained liquids including used motor vehicle oil, multipurpose grease/lubricant, antifreeze, and hydraulic fluids [refer to <u>Appendix B, Photograph Log (Photographs 17, 19, 21, 28, 31, 33, 34, 38, 55-57, 59, 67, 68, 74-78, 84-87, 90, and 91)</u>]. The EPA Inspection Team observed poor housekeeping procedures for liquid storage/disposal throughout the truck storage yard. According to the Facility representative, these materials were handled/stored by the individual truck operators.

Waste Storage/Disposal Areas (solid and/or hazardous)	The EPA Inspection Team observed one (1) 8-cubic yard solid waste dumpster for general waste along the southern border of the Facility [refer to <u>Appendix B, Photograph Log (Photograph 6)</u>]. The solid waste dumpster had a permanent cover/lid attached but was not covered at the time of the inspection.
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SITE EVALUATION	
Pollutant Sources	Note location, quantity/size, design issues, any operation and maintenance (O&M) deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are Best Management Practices (BMPs) in place to minimize or eliminate stormwater discharges from industrial activities? The EPA Inspection Team observed one (1) uncovered metal container that contained miscellaneous scrap metal, located in the southwestern portion of the Facility [refer to Appendix B, Photograph Log (Photographs 7 and 8)]. The EPA Inspection Team observed solid and liquid wastes, such as rusting mechanical parts, used motor vehicle fluids, lead-acid car batteries, and old tires stored uncovered outdoors throughout the truck storage yard [refer to Appendix B, Photograph Log (Photographs 17-23, 28-31, 33, 34, 38, 53, 54, 59, 66-68, 72, 74-78, 87, and 89-91)]. The EPA Inspection Team observed hardened piles of concrete waste and evidence of a concrete washout along the northern portion of the truck storage yard [refer to Appendix B, Photograph Log (Photographs 81 and 83)].
Waste Treatment Facilities (e.g., Pretreatment Systems)	None observed or reported at the Facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	The Facility has one (1) warehouse for servicing and repairing trucks for commercial customers. According to the Facility representative, the southern alley adjacent to the maintenance shop had previously been used as a vehicle wash rack, with a sump present for collecting wash water. The Facility representative mentioned that the facility no longer washes trucks, and the former wash rack area is used for servicing and repairing semi-trucks [refer to Appendix B, Photograph Log (Photographs 1-4)]. The EPA Inspection Team observed evidence that truck drivers service their trucks in the lots they lease from the Facility. Specifically, motor vehicle parts, lead-acid batteries, used motor vehicle fluids, old tires and petroleum stains from vehicle maintenance operations were observed within the outdoor truck storage yard [refer to Appendix B, Photograph Log (Photographs 17, 19-22, 25, 29-31, 37, 38, 53, 54, 59, 67, 75, 77, 89, 90, and 91)].
Sediment & Erosion Controls	The EPA Inspection Team did not observe any sediment and erosion controls at the Facility. The EPA Inspection Team observed six (6) aggregate/sediment piles stored uncovered and uncontained along the northern portion of the truck storage yard [refer to Appendix B, Photograph Log (Photograph 88)]. These aggregate/sediment stockpiles measured about 5 feet tall and covered an area of approximately 1,000

SITE EVALUATION

Pollutant Sources	Note location, quantity/size, design issues, any operation and maintenance (O&M) deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are Best Management Practices (BMPs) in place to minimize or eliminate stormwater discharges from industrial activities?
	square feet.
Spills/Leaks Handling	The EPA Inspection Team did not observe any spill kits at the time of inspection, including near sources of pollution such as such as containers/tanks of motor vehicle oil, multipurpose grease/lubricant, antifreeze, and hydraulic fluids. See above section <u>labeled Liquid Storage (e.g., Tanks, Liquid Storage Drums)</u> for more details on potential sources of pollution.
Outside Shelters	☐ Temporary (Date Established <u>NA</u>) ☐ Permanent None observed or reported at the Facility.
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	Evidence of non-stormwater sources/discharges was not observed during the inspection.
Evidence of process wastewater sources/discharges?	Evidence of process wastewater sources/discharges was not observed during the inspection.

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

Number and description of each potential Stormwater Discharge Point from the Facility	The EPA Inspection Team observed one discrete (1) stormwater discharge point from the Facility. Discharge Point #1 was located at the southeastern corner of the Facility at the end of a vegetated stormwater conveyance which conveyed stormwater eastward along the southern border of the Facility. Based off the slope of the Facility and the observed pooled stormwater within the conveyance channel, the EPA Inspection team identified this grass conveyance channel as a discharge point which would convey stormwater for approximately 500 feet to the low lying wooded area and then to Hickory Creek which runs along the eastern boundary of the Facility [refer to <u>Appendix B, Photograph Log (Photographs 41, 43-52, 60, and 62)</u>]. The EPA Inspection Team additionally observed the northern and eastern boundaries of the Facility sloped north/northeast. Stormwater, which did not convey toward the vegetated stormwater conveyance described above, would be
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OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
	conveyed as overland flow toward the vegetated low-lying area to the north and northeast of the Facility.
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into receiving waters or in MS4	The EPA Inspection Team observed pooled stormwater in and around the vegetated stormwater conveyance in the southern portion of the truck storage yard [refer to Appendix B, Photograph Log (Photographs 41-43, 51 and 52)]. Within the pooled stormwater in the southern portion of the Facility, adjacent to the stormwater conveyance, the EPA Inspection Team observed bubbles along the surface of the pooled stormwater potentially derived from surfactant/industrial cleaning agents. Additionally, pooled stormwater and concrete waste debris was observed on an impermeable liner on the ground next to a concrete pump truck in the northern portion of the truck storage yard [refer to Appendix B, Photograph Log (Photograph 83)]. According to the Facility representative, the impermeable liner was used by one of the tenants as a concrete washout.
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	Evidence of non-stormwater discharges was not observed during the inspection.
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	The EPA Inspection Team observed that the ground surface throughout the Facility was unpaved except for a concrete pad in the alleyway located to the south of the truck maintenance warehouse [refer to Appendix B, Photograph Log (Photograph 3)]. This concrete pad sloped inwards towards a sump at the center of the concrete pad [refer to Appendix B, Photograph Log (Photograph 4)]. The unpaved portion of the Facility generally sloped southeast towards the vegetated stormwater conveyance channel which discharges via one discrete discharge point (Discharge Point #1) to the wooded area and then to Hickory Creek which runs along the eastern boundary of the Facility [refer to Appendix B, Photograph Log (Photographs 41, 43-52, 60, and 62)]. The EPA Inspection Team did, however, also observe that the northern and eastern boundaries of the Facility sloped north/northeast and conveyed stormwater as overland flow toward the vegetated low-lying area to the north and northeast of the Facility.

SECTION III – AREAS OF CONCERN

- 1) At the time of the inspection, the EPA Inspection Team identified the following at the Facility:
 - a. Best Route, Inc. is a commercial truck repair shop and semi-truck storage yard (SIC Code 4226-15 – Truck Trailer-Parking & Storage or SIC Code 7538 – General Automotive Repair Shops).
 - b. The Facility's outdoor areas were used for industrial activities including storage of semi-trucks [refer to [Appendix B, Photograph Log \(Photographs 11-13, 26, and 27\)](#)], semi-truck vehicle maintenance/repair, and storage of vehicle maintenance materials, fluids, and scrap metal parts

[refer to Appendix B, Photograph Log (Photographs 17, 19-22, 25, 29-31, 37, 38, 53, 54, 59, 67, 75, 77, 89, 90, and 91)]. The Facility's outdoor area was also used for storage of aggregates/sediment [refer to Appendix B, Photograph Log (Photograph 88)].

- c. At the time of the inspection, the Facility did not have coverage under the 2021 Multi-General Stormwater Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity.
- d. Due to the grading of the Facility, stormwater from areas used for industrial activities in the southern portion of the Facility drains southeast towards a vegetated stormwater conveyance channel that discharges to a low-lying wooded area and then to Hickory Creek, which runs along the eastern boundary of the Facility [refer to Appendix B, Photograph Log (Photographs 41, 43-52, 60, and 62)]. Stormwater from areas used for industrial activities in the north/northeastern portions of the Facility conveys offsite as overland flow to a low-lying wooded area.

2) The EPA Inspection Team also observed the following:

- a. A used motor oil storage station located within the truck repair/maintenance warehouse. This storage station held one (1) 300-gallon aboveground storage tank (AST), seven (7) 55-gallon drums, and approximately eleven (11) smaller pans/buckets full of used motor vehicle oil [refer to Appendix B, Photograph Log (Photographs 93 and 94)]. These liquid storage containers were not placed within secondary containment.
- b. A combination of 55-gallon drums, 5-gallon buckets, 300-gallon IBC tanks, and other liquid storage vessels were stored uncovered outdoors throughout various portions of the truck storage yard. These vessels contained liquids ranging from used motor vehicle oil, multipurpose grease/lubricant, antifreeze, and hydraulic fluids [refer to Appendix B, Photograph Log (Photographs 17, 19, 21, 28, 31, 33, 34, 38, 55-57, 59, 67, 68, 74-78, 84-87, 90, and 91)]. These liquid storage vessels were stored with no secondary containment and located upgradient of areas which sloped north/east towards the low-lying wooded area or southeast towards Discharge Point #1.
- c. Solid waste such as scrap metal parts, trash, lead-acid batteries, and used tires were stored uncovered outdoors throughout various portions of the truck storage yard [refer to Appendix B, Photograph Log (Photographs 17-23, 28-31, 33, 34, 38, 53, 54, 59, 66-68, 72, 74-78, 87, and 89-91)]. These materials were located upgradient of areas which sloped north/east towards the low-lying wooded area or southeast towards Discharge Point #1.
- d. One (1) inoperable forklift was parked in the truck storage area. Petroleum staining was observed on the gravel underneath the forklift [refer to Appendix B, Photograph Log (Photographs 72 and 73)]. This forklift was located approximately 190 feet upgradient of Hickory Creek.
- e. One (1) damaged/inoperable riding lawn mower was on the ground in the southeastern corner of the truck storage yard and located approximately 10 feet away from Discharge Point #1 [refer to Appendix B, Photograph Log (Photograph 61)].
- f. One (1) partially dismantled commercial truck was in the northern portion of the truck storage yard [refer to Appendix B, Photograph Log (Photograph 35)]. This truck was located approximately 600 feet upgradient of Discharge Point #1.
- g. One (1) scrapped commercial truck which was stored on the Facility's eastern border [refer to Appendix B, Photograph Log (Photographs 64 and 65)]. The cab/engine bay of the truck was located over a steep slope which would convey stormwater downgrade into the wooded area adjacent to the Facility. This truck was located approximately 150 feet upgradient of Hickory Creek.

- h. Approximately six (6) uncovered and uncontained sediment/aggregate piles were stored along the northern portion of the truck storage yard [refer to Appendix B, Photograph Log (Photograph 88)].
- i. Petroleum stains were on the gravel around the truck storage yard with no observed spill kits onsite [refer to Appendix B, Photograph Log (Photographs 25, 73, and 81)]. These petroleum stains were located upgradient of areas that sloped north/east towards the low-lying wooded area or southeast towards Discharge Point #1.
- j. A concrete pump truck was stored in the northern portion of the truck storage yard with piles of concrete waste located on the adjacent ground surface [refer to Appendix B, Photograph Log (Photographs 81 and 82)]. The pump truck and the piles of concrete waste were located along the northern border of the Facility which sloped northeast towards the wooded low-lying area located to the northeast of the Facility.
- k. One (1) impermeable liner was covered with concrete washout and pooled water located next to the concrete pump truck [refer to Appendix B, Photograph Log (Photographs 83)].
- l. Pooled stormwater adjacent to a vegetated stormwater conveyance in the southern portion of the truck storage yard. Bubbles were located along the surface of the pooled stormwater possibly derived from surfactant/industrial cleaning agents [refer to Appendix B, Photograph Log (Photographs 41 and 42)]. Orange discoloration of the water was noted; however, the EPA Inspection could not confirm the source of this discoloration.

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log