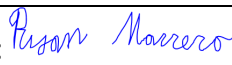


UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	May 15, 2024	
Time	Entry: 3:00 PM	Exit: 3:30 PM
Weather Conditions	82°F and Sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Trash Truck Repair, LLC	
Facility or Site Name:	Trash Truck Repair, LLC	
Permit ID or Tracking #:	N/A; No permit at the time of the inspection	
SIC Code:	4214 – Local Trucking with Storage, or 7538 – General Automotive Repair Shops	
Facility Address:	2208 Peachtree Road	
(city, state, zip code)	Balch Springs, TX 75180	
Geographic Coordinates:	32.73944°, -96.63007°	
Mailing address:	2208 Peachtree Road	
(city, state, zip code)	Balch Springs, TX 75180	
County:	Dallas County	
Regular Days/Hours of Operation:	8:00 AM – 6:00 PM (M – F); 8:00 AM – 12:00 PM (Sat); Closed (Sun)	
# of Employees at location:	Approximately 5	
Size of Facility (in acres):	Approximately 4.14 acres total with approximately 3.82 acres of outdoor activity	
Receiving Water(s):	Hickory Creek, which borders the Facility boundary to the east	
Date facility est. @ location:	1984	
Onsite Representatives:		
Name: Brandy G.	Title: Manager	Phone: (972) 285-7294
	Email: trashtruckrepair@hotmail.com	
Authorized Official:	Contacted? ☒ Yes ☐ No	
Name: Marvin Triplett	Title: Owner	Phone: (469) 446-0910
	Email: trashtruckrepair@hotmail.com	
Additional Personnel Participating in Inspection:		
Name: N/A	Title: N/A	
Inspector(s):	Title:	Company:
Chris 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
Destinee Agwuna	Inspector	Environmental Protection Agency, Region 6
Carol Johnson	Inspector	Environmental Protection Agency, Region 6
Inspection Report Author:		
Name: Ryan Marrero-Vila	Signature: 	Date: June 20, 2024

Supervisor Review:		
Name: Lori Tanner (acting for Ruben Alayon-Gonzalez)	Signature <i>Lori E. Tanner</i>	Date: 07/11/2024

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 Regulation (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 Trash Truck Repair, LLC located in Balch Springs, Texas (Facility). Ivy Koberlein of EPA Headquarters, Sharron Crayton, Destinee Agwuna, and Carol Johnson of EPA Region 6, and Chris Pardo and Ryan Marrero-Vila of ERG (collectively, EPA Inspection Team) met with the Facility representative, Brandy G. 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 Dallas, Texas area received trace amounts of rain the day prior to the inspection and no rain the day of the inspection.

- 2) Credentials presented to: Brandy G.
- 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...)).

Trash Truck Repair, LLC is a trash truck repair/maintenance shop and a storage yard for roll-off dumpsters holding construction and demolition (C&D) waste. According to the Facility representative, the roll-off dumpster storage yard is owned and operated by the Facility owner's son. The Facility representative also stated that all waste collection roll-off dumpsters are stored uncovered outside in the central and eastern portions of the Facility.

The Facility representative stated that all truck repair operations, such as welding, painting, and hydraulics maintenance occur inside the truck maintenance warehouse, which is located in the western portion of the Facility.

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 Facility loads and unloads waste collection roll-off dumpsters in the storage yard, keeping them onsite until ready for transport to a landfill. According to the Facility representative, roll-offs are taken and dumped at the local landfill daily, but roll-offs which come in after landfill operating hours are stored at the Facility overnight. Approximately thirty (30) uncovered roll-off dumpsters ranging in size from 20-to-30-cubic yards were observed along the central and eastern portions of the Facility. The EPA Inspection Team observed that these roll-offs were filled with C&D waste [refer to Appendix B, Photograph Log (Photographs 15, 16, 18-20, 34, 35 and 37)].
Industrial Manufacturing/Processing Operations	The EPA Inspection Team observed the Facility's primary businesses are trash truck repair/maintenance and temporary storage of roll off dumpsters filled with C&D waste. No industrial manufacturing or processing operations were observed or reported.
Industrial Machinery & Equipment Storage	The EPA Inspection Team observed one (1) front-end loader stored outside to transport C&D waste throughout the Facility [refer to Appendix B, Photograph Log (Photograph 11)]. According to the Facility representative, the Facility also maintains mechanical hoists, lifts, and forklifts which are used and stored inside the truck maintenance warehouse.

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 two (2) tow trucks with one (1) car stored on a tow truck bed in the southeastern corner of the storage yard [refer to Appendix B, Photograph Log (Photographs 21 and 29)]. One (1) water truck labeled “brine” was observed by the EPA Inspection Team in the eastern portion of the storage yard; the EPA Inspection Team could not confirm if brine was present within the water truck [refer to Appendix B, Photograph Log (Photograph 35)].
Storage of Industrial Materials or Products	The EPA Inspection Team observed approximately fifteen (15) tires and miscellaneous scrap metal stored along the eastern edge of the truck maintenance warehouse [refer to Appendix B, Photograph Log (Photographs 39 and 40)].
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The EPA Inspection Team observed a used oil storage tank with an approximate capacity of 500 gallons located underneath an awning attached to the southern side of the truck maintenance warehouse [refer to Appendix B, Photograph Log (Photographs 9 and 10)]. The oil storage tank was located within a metal containment structure. The containment structure was filled with used oil to approximately 3 inches from the top of the containment unit. The EPA Inspection Team observed a 1,000-gallon gasoline tank inside the truck maintenance warehouse [refer to Appendix B, Photograph Log (Photograph 44)]; the EPA Inspection Team could not confirm if the gasoline tank was double walled.
Waste Storage/Disposal Areas (solid and/or hazardous)	See the Section above titled “Loading/Unloading Operations” above for more details on waste collection roll-off dumpsters stored onsite. The EPA Inspection Team observed an uncovered 2-yard solid waste dumpster along the northern side of the truck maintenance warehouse [refer to Appendix B, Photograph Log (Photographs 49 and 50)]. The solid waste dumpster contained wood, paper towels, aluminum cans, and miscellaneous organic debris. The dumpster did not have a permanent cover/lid. The EPA Inspection Team observed an uncovered, brick wall-lined central dumping station approximately 20’ to the east of the maintenance warehouse. The central dumping station occupied approximately 900 square feet and contained organic and landscaping waste as well as miscellaneous household and construction trash. The dumping station was located over a concrete pad. [refer to Appendix B, Photograph Log (Photographs 11, 12, 14, and 38)]. The EPA Inspection Team observed miscellaneous construction debris and concrete waste stockpiles within a grassy area at the northeastern portion of the Facility,

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?
	approximately 290' to the west of and upgradient of the unnamed receiving water/pond [refer to <u>Appendix B, Photograph Log (Photographs 22, 32, and 33)</u>]. The EPA Inspection Team additionally observed one (1) lead-acid car battery stored on the paved surface outside along the northern wall of the truck maintenance warehouse [refer to <u>Appendix B, Photograph Log (Photographs 51 and 52)</u>].
Waste Treatment Facilities (e.g., Pretreatment Systems)	None observed or reported at the Facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	According to the Facility representative, all truck maintenance operations occur inside the maintenance warehouse. The Facility has a 1,000-gallon gasoline tank stored within the maintenance warehouse for fueling onsite equipment [refer to <u>Appendix B, Photograph Log (Photograph 44)</u>]; the EPA Inspection Team could not confirm if the gasoline tank was double walled. The EPA Inspection Team observed one (1) uncovered 2.5 gallon jug of diesel exhaust fluid (DEF) with an open siphon outside, approximately 70' northeast of the truck maintenance warehouse doors, and three (3) DEF containers stored indoors on the floor in front of the 1,000-gallon gasoline tank. Based on these observations, the Facility may inject DEF into the trash trucks outside on the concrete pad [refer to <u>Appendix B, Photograph Log (Photographs 42-44)</u>].
Sediment & Erosion Controls	The EPA Inspection Team did not observe any sediment and erosion controls at the Facility.
Spills/Leaks Handling	The EPA Inspection Team did not observe any spill kits at the time of inspection.
Outside Shelters	☐ Temporary (Date Established _____) ☐ 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 that the Facility sloped to the east, conveying stormwater towards an unnamed receiving water/pond located in the wooded area to the east of the Facility. Based on visual observations, the EPA Inspection Team observed one (1) discrete stormwater discharge conveyance channel: 1) Discharge Point #1 was observed at the eastern end of a grass conveyance channel located at the southeastern corner of the Facility [refer to Appendix B, Photograph Log (Photographs 23-28, 30-31, and 36)]; Based on the eastward slope of the facility, this grass conveyance channel receives stormwater via surface flow from the roll-off dumpster storage yard. This discharge point would convey stormwater to an unnamed receiving water/pond within the wooded area east of the Facility. The EPA Inspection Team observed that the unnamed receiving water/pond would overflow to Hickory Creek.
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into receiving waters or in MS4	The EPA Inspection Team observed ponded water along the southern side of the roll-off dumpsters located along the southern fence line, approximately 100' upgradient of the observed grassy conveyance channel [refer to Appendix B, Photograph Log (Photograph 17)]. The grassy conveyance channel conveys stormwater along the southern fence line to Discharge Point #1. The EPA Inspection Team observed C&D waste on the ground and in the ponded water. The ponded water was turbid. The EPA Inspection Team observed garbage leachate in the central dumping station and to the north of the truck maintenance warehouse [refer to Appendix B, Photograph Log (Photographs 14, 34, 38, 45, and 46)]. Based on the observed slope of the Facility, and a lack of containment measures for the leachate (i.e., total suspended solids and silicone compounds from landscaping and demolition debris, and per- and polyfluoroalkyl substances (PFAS) in household and organic trash) at the central dumping station, stormwater would combine with leachate and flow downgradient to the east towards Hickory Creek. The EPA Inspection Team observed petroleum staining in four areas: • Around a floor drain in the alley between the Facility's southern boundary and the truck maintenance warehouse. The EPA Inspection Team could not confirm the drain's connection [refer to Appendix B, Photograph Log (Photographs 7 and 8)]. • The pavement south of the central dumping area [refer to Appendix B, Photograph Log (Photograph 13)]. • On the floor directly next to the 1,000 gallon gasoline tank and the roll up door along the northern side of the truck maintenance warehouse [refer to Appendix B, Photograph Log (Photograph 44)]. • In the parking lot north of the maintenance warehouse [refer to Appendix

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
	<u>B, Photograph Log (Photographs 47 and 48)].</u>
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 a few topographic lows where stormwater would collect, see above section titles “Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into receiving waters or in MS4” for more details. However, in general, the ground surface throughout the Facility is sloped to the east and towards the grassy wooded area located to the east of the Facility and the conveyance channel at the southeastern corner. The Facility had one (1) discrete discharge point that conveys stormwater offsite to the east. See the Section above titled “Number and description of each potential Stormwater Discharge Point from the Facility” above for more details.

SECTION III – AREAS OF CONCERN

At the time of the inspection, the EPA Inspection Team identified the following at the Facility:

- 1) At the time of the inspection, the EPA Inspection Team identified the following at the Facility:
 - a. The Facility is a trash truck repair shop and provides temporary storage of roll-off dumpsters full of C&D waste (SIC Code 4214 – Local Trucking with Storage or SIC Code 7538 – General Automotive Repair Shops). SIC Code 4214 is regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
 - b. The Facility’s outdoor areas were used for industrial activities including storage of roll-off dumpsters full of C&D waste, tow truck storage, and open dumping and moving of C&D, household, and organic waste [refer to Appendix B, Photograph Log (Photographs 11, 12, 14, 15, 18-22, 29, 32-34, 35, 37 and 38)].
 - 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. Based on observations, Facility stormwater from areas used for industrial activities would discharge via a grassy conveyance channel into an unnamed receiving water/pond in the wooded area east of the Facility at Discharge Point #1 [refer to Appendix B, Photograph Log (Photographs 23-28, 30-31, and 36)]. The unnamed receiving water/pond is approximately one quarter of an acre in area. Due to the eastward slope of the Facility and wooded area adjacent to the Facility, excess stormwater from the unnamed pond would be conveyed approximately 100’ east towards Hickory Creek.
- 2) The EPA Inspection Team observed approximately thirty (30) uncovered 20-to-30-cubic yard roll-off dumpsters holding C&D waste along the central and eastern portions of the Facility [refer to Appendix B, Photograph Log (Photographs 15, 18, 19, 20, 34, 35 and 37)]. The easternmost roll-off dumpsters along

the Facility's southern boundary were located approximately 5' from the grassy stormwater conveyance channel which discharges stormwater offsite through Discharge Point #1.

- 3) The EPA Inspection Team observed ponded stormwater behind the roll-off dumpsters along the Facility's southern border. C&D waste was observed in the ponded water and the water was turbid. This ponded water was located along the southern fence line and approximately 100' upgradient of the grassy stormwater conveyance channel which conveys stormwater along the southern fence line to Discharge Point #1. [refer to Appendix B, Photograph Log (Photograph 17)].
- 4) The EPA Inspection Team observed C&D, household, and organic waste was stored within the brick wall-lined central dumping station [refer to Appendix B, Photograph Log (Photographs 11, 12, 14 and 38)]. The EPA Inspection Team also observed garbage leachate in this area. This central dumping station was enclosed on three sides and over a concrete pad. Due to the slope of the Facility, stormwater would combine with the waste and leachate in the central dumping station and be conveyed east towards Discharge Point #1.
- 5) The EPA Inspection Team observed uncontained piles of C&D waste within the grassy area in the eastern portion of the Facility. These uncontained piles were located approximately 88' upgradient from Discharge Point #1 and approximately 305' from the unnamed receiving water/pond [refer to Appendix B, Photograph Log (Photographs 22, 32, and 33)].
- 6) The EPA Inspection Team observed one (1) uncovered 2-yard solid waste dumpster along the northern side of the maintenance warehouse [refer to Appendix B, Photograph Log (Photographs 49 and 50)]. Due to the slope of the Facility, stormwater could combine with the waste in the uncovered 2-yard solid waste dumpster and be conveyed east towards Discharge Point #1.
- 7) The EPA Inspection Team observed a used oil storage tank with an approximate capacity of 500 gallons located underneath an awning attached to the southern side of the truck maintenance warehouse [refer to Appendix B, Photograph Log (Photographs 9 and 10)]. The oil storage tank was located within a metal containment structure which was filled with used oil to within approximately 3 inches from the top of the containment unit.

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log