MS4 Self-Assessment

Spill Prevention and Response Program

Module 13

Name of the Permittee: City of San Antonio	MS4 Permit Number: WQ0004284000
Assessment Period:	

Permittee Instructions: Please complete the worksheet below. Please note that upon opening this Module, some content may be disabled such as the capacity to check inside the "boxes." The content can usually be activated by pressing "Enable Content" which will appear below the Toolbar in "MS Office."

ATTACHMENTS REQUESTED	Document attached
1. Attach an organizational chart.	☐ YES ☑ NO

SPILL PREVENTION AND RESPONSE **Control Measure to prevent, contain and respond to spills that may discharge into the MS4.**	
1. In accordance with 40 CFR § 122.26 [Phase I]) has the permittee developed a *Storm Water Management Program (SWMP),* that describes how the **Spill Prevention and Response** Control Measure will be implemented?	☑ YES ☐ NO
2. What pollutants of concern are targeted for reduction through the implementation of the **Spill Prevention and Response** program?	
Response Emergency Spills of any known or unknown chemicals from accidents, fires and illegal dumping	
ORGANIZATIONAL STRUCTURE	
1. Is there a storm water team in place to ensure that the **Spill Prevention and Response** program is properly implemented?	☑ YES ☐ NO
2. Describe the organizational structure and staff necessary to implement the **Spill Prevention and Response** program. Include the name, title, contact information, department name and key responsibilities of each team member.	
Response Captain Troy Teague 515 N. Cherry San Antonio Fire Department/Haz-Mat Team	
3. What co-permittee or interagency departments participate in the implementation of the **Spill Prevention and Response** program?	
Response Texas Department of Transportation on Highways and City of San Antonio Fire Department	
4. Describe any formal agreements and key areas of responsibility shared by the permittee, co-permittee(s) and/or interagency departments in the implementation of the **Spill Prevention and Response** program.	
Response MS4 Permit	
5. Do program participants *(e.g., permittee, co-permittee, and other departments)* meet regularly to discuss the progress of the program?	☑ YES ☐ NO
6. Describe the frequency of these meetings.	
Response Monthly	
LEGAL AUTHORITY	
1. Does the permittee have legal authority to implement the **Spill Prevention and Response** program?	☑ YES ☐ NO

2. What ordinances, codes, or policies provide this legal authority?
Response: NFPA, TCEQ Standards, SA Fire SOP's, COSA Annex Q-HazMat and Oil Spill Response
3. Who *(e.g., specific staff, department, etc.)* has the authority to enforce this legal authority?
Response: City of San Antonio Fire Department

FISCAL RESOURCES		
1. What is the budget for the implementation of the **Spill Prevention and Response** program?	**REPORTING PERIOD**	**NEXT REPORTING PERIOD**
	Response 276,269,449	**Response 276,269,449**

SECTION I: MEASURABLE GOALS

1. What Measurable Goals were established to implement an effective **Spill Prevention and Response** program? Include expected quantifiable results.

Measurable Goal 1	Number of Reportable Spills within the City.
Expected Quantifiable Results	Date, Time, Incident #, Location, Product Involved, Size of Spill, Action Taken, Waterway Affected
Measurable Goal 2	
Expected Quantifiable Results	
Measurable Goal 3	
Expected Quantifiable Results	
Measurable Goal 4	
Expected Quantifiable Results	

2. Are these Measurable Goals described in the SWMP?	☐ YES ☐ NO

SECTION II: SPILL PREVENTION PLAN

1. Is there a **Spill Prevention and Response** Plan in place?		☑ YES ☐ NO
2. Does the **Spill Prevention and Response** Plan specify *(Check all that apply):*	**a. materials handling procedures?**	☑ YES ☐ NO
	b. storage requirements?	☑ YES ☐ NO
	c. spill clean-up procedures for areas?	☑ YES ☐ NO
	d. processes in which spills may potentially occur?	☑ YES ☐ NO
	e. contamination assessment?	☑ YES ☐ NO
	f. recordkeeping of spills?	☑ YES ☐ NO
	g. internal reporting of spills?	☑ YES ☐ NO
	h. employee spill training?	☑ YES ☐ NO
	i. preventive maintenance?	☑ YES ☐ NO
	j. flow diversion?	☑ YES ☐ NO
	k. proper procedures to be followed in	☑ YES ☐ NO

	the event of a hazardous materials spill which could affect persons, property or the environment?	
	l. physical methods for the cleanup of dry chemicals including the use of brooms, shovels, sweepers, or plows?	☑ YES ☐ NO
	m. mechanical methods including the use of vacuum cleaning systems and pumps?	☑ YES ☐ NO
3. Does the **Spill Prevention and Response** Team coordinate with interagency departments to:	**a. practice emergency responses?**	☑ YES ☐ NO
	b. re-evaluate and revise the plan to better address spills and storm water management issues?	☑ YES ☐ NO
	c. review the plan at least annually and following any spills to evaluate the Spill Prevention Plan's level of success and how it can be improved?	☑ YES ☐ NO

4. Describe the frequency of these meetings.

Response:

SECTION II: SPILL RESPONSE TRAINING

STAFF

1. Does the permittee require staff *(i.e., Spill Response Team)* to complete special, continuous, and or annual training or obtain certification or licensing to implement and manage the **Spill Prevention and Response** program?	☑ YES ☐ NO

2. If yes, describe the applicable training, certification or licensing and the required frequency for each.

Response 80 Hour Haz-Mat Tech Course and Annual Continual Education Courses

3. Are key staff trained in the use of the **Spill Prevention and Response** Plan?	☑ YES ☐ NO
4. Are the staff trained on spill control procedures?	☑ YES ☐ NO

5. Is there a system in place to notify staff and inspectors when required training is due, and does it document the training completion dates?

Response On- Line Database

SECTION III: MAPPING

1. Are maps developed to show the location of these facilities:

	Storm drains	☑ YES ☐ NO
	Outfalls and storm water discharges	☑ YES ☐ NO
	Drainage areas for each storm water outfall	☑ YES ☐ NO
	Surface waters *(or if through a MS4)*	☑ YES ☐ NO
	Location of past spills and leaks	☑ YES ☐ NO
	Location of high-risk, waste-generating areas and activities common sites such as:	☑ YES ☐ NO
	a. Fueling stations	☑ YES ☐ NO

	b. Vehicle/equipment washing and maintenance areas	☐ YES ☑ NO
	c. Area for unloading/loading materials	☐ YES ☑ NO
	d. Above ground tanks for liquid storage	☑ YES ☐ NO
	e. Industrial waste management areas *(landfills, waste piles, treatment plants, disposal areas)*	☐ YES ☑ NO
	f. Outside storage areas for raw materials, by-products, and finished product	☑ YES ☐ NO
	g. Outside manufacturing areas	☐ YES ☑ NO
h. Other areas of concern *(Specify)*:		

SECTION IV: INSPECTIONS

1. Are there businesses and public agencies that generate hazardous waste and or produce, transport, or store petroleum products within the jurisdiction of the permitted MS4?		☑ YES ☐ NO
2. Has an inventory of these businesses and public agencies been developed?		☑ YES ☐ NO
3. How many of these facilities exist within the permittee's jurisdiction?		
Response: 2500 facilities		
4. Does the inventory describe the facility and include the owner's name and address, the nature of the facility activity, and the general types of chemicals used in the facility?		☑ YES ☐ NO
5. Are these facilities inspected?		☑ YES ☐ NO
6. How frequently are these facilities inspected? Annually		
7. Do the inspectors check to determine that the facility has:	**a. a site plan that shows the locations of chemical storage areas, storm drains, tributary drainage areas with drainage arrow, all surface waters on or next to the facility *(i.e., collection basins)*?**	☑ YES ☐ NO
	b. notification procedures to be used in the event of a spill *(i.e., phone numbers of key personnel and appropriate regulatory agencies)*?	☑ YES ☐ NO
	c. specific instructions regarding clean-up procedures?	☑ YES ☐ NO
	d. a single designated person who has overall responsibility for spill response actions?	☑ YES ☐ NO
	e. in the event of a spill, a summary plan posted at appropriate points at the facility *(i.e., cafeteria, areas with high spill potential)*?	☑ YES ☐ NO
	f. identified in the summary, the spill clean-up coordinator, location of clean-up kits, and phone numbers of regulatory offices to be contacted in the event of a spill?	☑ YES ☐ NO

	g. emergency spill containment and clean-up kits located at the facility and that they contain the appropriate type and quantity of chemicals or goods to address on-site spills?	☑ YES ☐ NO
	h. reviewed emergency spill response plans at least annually?	☑ YES ☐ NO
	i. reviewed emergency spill response plans following any spills to evaluate the Spill Prevention Plan's level of success and how it can be improved?	☑ YES ☐ NO
	j. complied with state and federal law to prepare a Spill Prevention Clean-up Plan?	☑ YES ☐ NO
	k. employees trained to address spills?	☑ YES ☐ NO
	l. non-storm water discharges and non-approved connections to storm water?	☑ YES ☐ NO

SECTION V: ENFORCEMENT

1. Have significant *(e.g., chemical, sanitary sewer overflow)* spills discharged to the MS4 within the reporting year?	☐ YES ☑ NO
Response: n/a	
2. If yes, describe the type and number of spills that discharged into the MS4.	
Response: n/a	
3. Is the responsible party or source of the spill identified in each case?	☑ YES ☐ NO
4. Does the permittee hold the responsible party liable and responsible for cleaning up the spill?	☑ YES ☐ NO
5. Has the permittee experienced problems in getting significant spills cleaned up within a reasonable time to reduce impact to the MS4/surface waters?	☐ YES ☑ NO
6. Is an enforcement plan in place to ensure that the responsible party cleans up the spill/s?	☑ YES ☐ NO
7. Describe the enforcement plan to address significant spills.	
Response Haz-Mat team will facilitate the clean-up of spills w/TCEQ and responsible party.	

SECTION VI: RECORDS MANAGEMENT

1. Does the permittee have a database in place to track activities of the **Spill Prevention and Response** program?	☑ YES ☐ NO
2. What information *(spills, sanitary sewer overflows, inspections, maintenance and repairs, training)* is tracked in the database for the **Spill Prevention and Response** program?	
Response: Date, time, product, action taken, amount, location, and waterway impacted.	
3. Who has access to the database?	
Response Haz-Mat Team	
4. Who is responsible for updating the database?	
Response Haz-Mat Team	
5. Does the permittee update its SWMP to reflect current change and progress made in the **Construction Site Runoff** program?	☑ YES ☐ NO

SECTION VII: ASSESSMENT	
1. Does the permittee assess the effectiveness of the **Spill Prevention and Response** program?	☑ YES ☐ NO
2. Based on the results of the effectiveness assessment, describe the positive results of the **Spill Prevention and Response** program.	
Response We expedite response to spills to reduce impact to the environment and the public.	
3. Based on the results of the effectiveness assessment, what changes are proposed to enhance the **Spill Prevention and Response** program?	
Response None at this time	
4. Does the permittee have an adequate staff and equipment to implement the **Spill Prevention and Response** program?	☑ YES ☐ NO
5. Does the permittee assess the **Spill Prevention and Response** program to determine if it meets Measurable Goals and other indicators?	☑ YES ☐ NO
6. Does the permittee assess the **Spill Prevention and Response** program's compliance with the permit requirements?	☑ YES ☐ NO
7. Does the permittee generate an assessment report of the **Spill Prevention and Response** program for its records?	☑ YES ☐ NO
8. What departments are involved in the **Spill Prevention and Response** program assessment?	
Response	

Completed by (Print Name): Arthur Reinhardt		
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