

DALLAS/FT. WORTH INTERNATIONAL AIRPORT TENANT POLLUTION PREVENTION (P3) PLAN GUIDANCE DOCUMENT



DFW will be the Airport of Choice by creating a positive, competitive, and safe environment that exceeds our customers' expectations.



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Attachment A: DFW Airport BMP Guidance Document

1.0 INTRODUCTION

Phase II of the Texas Pollutant Discharge Elimination System (TPDES) program addresses storm water discharges from small municipalities located in urbanized areas (as defined by the Bureau of the Census). As part of the rule, small municipalities are required to employ a program, which reduces the pollutant loadings in storm water runoff, which discharge to receiving waters to the maximum extent practicable (MEP). Expected benefits of the Phase II regulation include: reduced erosion on streambeds, improved aesthetic quality of waters, reduced eutrophication of aquatic systems, and improved habitats for wildlife and endangered species.

Dallas/Ft. Worth International (DFW) Airport Environmental Affairs Department (EAD) has developed a Storm Water Management Plan (SWMP), which addresses six minimum control measures (MCMs):

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Good Housekeeping/Pollution Prevention
5. Construction Site Runoff Control
6. Post Construction Runoff Control

The SWMP incorporates both structural and non-structural control measures targeting specific audiences and designed to manage and improve the quality of discharges entering and exiting the DFW Airport Municipal Separate Storm Sewer System (MS4). In order to assist in the implementation of the DFW SWMP, EAD will implement a Pollution Prevention Plan (P3) program targeting all airport tenants and subtenants. The P3 program will be used as an interactive informational tool, whereby tenants can provide DFW Airport with general information in regards to the types of activities and operations that will be conducted onsite, and at the same time the tenant can gain important information in regards to airport policies, airport contacts, and the structural/ non-structural control mechanisms, which need to be implemented in order to protect the environment, and ensure compliance with environmental regulations and airport policies. The implementation of the P3 Program will assist various departments in accessing important information in regards to airport tenants and subtenants, currently not readily available. The information obtained in the P3 Plan will be transferred to an internal database, to be used by various departments to monitor tenant activity and identify safety or other regulatory concerns.

The DFW Airport P3 Plan is comprised of two sections, Part I is comprised of an airport and facility guide, which provides specific information on airport policies, department contacts, and code, maintenance and environmental requirements. Part II is the DFW Airport P3 Plan, which must be completed by all tenants/sub-tenants prior to occupying a DFW Airport facility

2.0 AIRPORT POLICIES AND PROCEDURES

Tenant operations on airport property have the potential to impact DFW Airport's environmental compliance with local, state, and federal laws. Additionally, activities conducted by airport tenants or co-tenants can compromise health and safety standards, and impact airport infrastructure. While certain airport procedures and policies may be specific to certain activities and are not all included in this document; below is a summary of the most common airport policies and procedures with the potential to impact a tenant's operation at DFW Airport.

2.1 Environmental Affairs Department (EAD)

1. Environmental Management System: Outlines DFW Airport's commitment to achieving air transportation industry-wide leadership in its environmental response and stewardship programs and establishing a sustainable, beyond compliance standard of environmental excellence.
2. Allowable Non-Storm Water Discharges: Identifies the specific non-storm water discharges that are permitted to be discharged to the DFW Airport storm water collection system.
3. Due Diligence Policy: Requires the integration of environmental due diligence into new construction decisions, new lease decisions, and acquisitions and divestitures by DFW Airport Board.
4. Hydrocarbon Spill Recovery Policy: Establishes a formal policy for the recovery and management of accidental hydrocarbon releases.
5. Reporting Spills and Releases: Establishes policies and procedures in regards to timely reporting of spills or releases.
6. Wash Water Management Plan (WWMP): Requires all tenants to develop a WWMP prior to conducting any exterior washing or cleaning of vehicles or equipment (outside of a permanent designated wash facility)

2.2 Department of Public Safety – Fire Prevention and Planning Division

1. The design, construction, or alteration phase of any project at DFW Airport shall be reviewed by Fire Prevention. The purpose of this review is to identify the following: (1) Occupancy type, (2) Occupant load, and (3) Fire Alarm and Fire Protection requirements from the 2006 International Fire Code, the Construction and Fire Prevention Standards Resolution & Amendments to the Codes, and the Design Criteria Manual.
2. Permit application and review processes will consist of the following activities: (1) FP will review plans for fire code and design criteria compliance within 10 working days, (2) FP review dispositions and comments from FIRE are inputted into the DFW Building Standards Permit System (IMPACT), and (3) after plans are approved, FP will remain involved with the new construction inspection process and additional permitting.
3. New construction inspections, or building alteration inspections, are required by the Fire Code, especially as it relates to inspection of fire

protection systems and sprinkler systems. All required construction inspections will be conducted in a timely manner and all applicable permits will be issued through the office of Fire Prevention.

2.3 Airport Development & Engineering (ADE) – Code Compliance

1. Plumbing Cross-Connections can be defined as a physical connection between a potable water supply line and a non-potable water supply line, which may make the water unsafe to drink. DFW Airport Code Compliance is responsible for administering the airport's Cross-Connection Inspection program, which includes inspections of tenant facilities to ensure potable water systems remain safe for consumption, and comply with the requirements set forth by the Safe Drinking Water Act (SDWA), and Title 30 of the Texas Administration Code (TAC), Rules and Regulations for Public Water Systems (30TAC 290.44)
2. Backflows occur when water in a water line is flowing in the opposite of its intended direction either from the loss of pressure in the supply line or increased pressure from the customer's line. State rules and regulations may require that adequate backflow prevention devices be installed in water systems to eliminate the potential for the introduction of contaminants into public water systems. DFW Airport Code Compliance may inspect water systems associated with tenant facilities to identify potential backflow concerns or ensure backflow prevention devices are operating adequately.

3.0 NON-STRUCTURAL CONTROLS

Non-structural control mechanisms aimed at pollution prevention can be divided into two categories, good housekeeping practices and Best Management Practices (BMPs). Good housekeeping measures are steps generally taken by workers on a daily basis during the course of normal work day activities to reduce exposure of garbage and refuse to precipitation and runoff and to generally keep areas that may contribute pollutants clean and orderly. Best management practices (BMPs) are measures used to prevent or reduce pollution from on-site operations entering the storm water system. BMPs may include structural controls (e.g., oil/water separators and secondary containment) and non-structural controls (e.g., prohibitions of activities and standard operating procedures).

3.1 Good Housekeeping Practices

The intent of good housekeeping is to minimize the exposure of pollutants to the environment. The main components are Awareness, Involvement, and Alertness – Awareness is important to guard against potentially polluting circumstances; Involvement of each person at DFW Airport to participate in pollution prevention; and Alertness to improvements in practices or structural controls that could reduce pollution potential at DFW Airport. Good housekeeping techniques should be stressed to employees during training sessions.

The following practices are the basis of a good housekeeping program and are the minimum acceptable protocols at DFW Airport:

- Walkways, aisles, roadways and exits are to be kept clear at all times.
- Small spills are to be cleaned up immediately and disposed of in an approved manner.
- All refuse is to be placed or disposed in an appropriate container.
- Material and products are stored in a neat and orderly fashion with particular attention not to block walkways or access routes.
- Chemical containers are to be stored in enclosed or covered areas whenever possible to minimize contact with storm water.
- All chemical storage containers are to be properly labeled.

- Empty drums are to be placed only in their designated area and labeled as empty.
- Chemical containers and/or drums are to be kept closed at all times when not in use.
- Inside floors are to be kept clear of debris and spills and are to be swept or mopped regularly.
- Tools and equipment are to be kept clean and neatly stored when not in use.

3.2 Best Management Practices

As previously stated, BMPs can include non-structural controls (measures or activities taken to minimize pollution), or structural controls (i.e. stormceptors, oil/water separators, secondary containment) intended to eliminate or minimize the impact of environmental pollutants. The EAD has developed a BMP Guidance Document to educate tenants on the various control measures that should be incorporated into their daily activities to prevent or reduce storm water pollution. The DFW Airport BMP Guidance Document provides a list of common BMP that can be implemented which includes:

- Elimination of Non-Allowable Discharges
- Aircraft, Vehicle, and Equipment Maintenance
- Aircraft, Vehicle, and Equipment fueling
- Aircraft, Vehicle, and Equipment Washing
- Aircraft Deicing/Anti-icing
- Exterior Chemical and Material Handling and Storage
- Solid Waste and Garbage Disposal
- Building and Grounds Maintenance
- Storm Water Pollution Prevention Education
- Buildings and Ground Cleaning Operations
- Spill Response and Clean-up
- Preventive Maintenance of Structural Controls

A copy of the DFW Airport BMP Guidance Document is included in Attachment A. All airport tenants are expected to become familiar with the various BMPs applicable to their onsite activities, which are expected to be implemented throughout occupancy at DFW Airport.

4.0 STRUCTURAL CONTROLS

Structural controls can be defined as the physical features incorporated into the construction of a facility, which are designed to reduce or eliminate environmental pollution of a specific collection system, or increase safety. Common structural controls impacting airport tenants include:

- Oil/Water Separators
- Grease/Sand Traps
- Fire Suppression Systems
- Stormceptors and Drain filters (or similar systems designed to treat storm water runoff)
- Diversion valves and shut-off valves
- Secondary containment structures
- Storm water retention and spill containment ponds

4.1 Preventive Maintenance (PM) Programs

Preventive Maintenance involves the regular inspection and maintenance of devices, and the testing of facility equipment and systems to ensure effective operation. Periodic inspections and PM activities should identify conditions that may contribute to the reduced effectiveness or failure of a structure, which could result in the discharge of pollutants. The preventive maintenance program should encompass the following components:

- Identify equipment, systems, and areas that should be inspected and establish an appropriate inspection and maintenance schedule to ensure effective operation;
- Utilizing qualified personnel to conduct periodic inspections of equipment, systems, and areas;
- Conduct timely adjustment, repair, or replacement of equipment; and
- Maintain adequate documentation on all inspections and equipment/system repairs or adjustments.

Airport tenants and operators of facilities with structural controls specific to the constructed facility (and not exterior airport infrastructure) are responsible for the upkeep and maintenance of those systems in order to ensure effective

operation. Airport tenants and operators of facilities are responsible for maintaining records of all inspections and PM activities, and ensuring these records can be made available to the appropriate jurisdictional authority upon request. Upon request from DFW Airport staff, Airport tenants shall provide copies of preventive maintenance records at any time to ensure compliance.

5.0 SPILL RESPONSE AND REPORTING

The establishment of standard operating procedures for safety, spill prevention, and proper employee training can reduce spills and leaks. In the event a spill occurs, a swiftly executed response may prevent storm water contamination and reduce incurred costs from extensive clean-up operations. Activities and areas where spills are likely to occur on DFW Airport are listed below:

- Fuel dispensing and bulk transfer areas including vehicle and aircraft fueling (and sites with USTs and ASTs)
- Vehicle and equipment maintenance or staging areas
- Chemical storage areas
- Loading/Unloading areas
- Aircraft maintenance
- Material storage areas
- Deicing areas at taxiways, ramps, runways, and hangars
- Terminal aircraft aprons
- Terminal Triturator Areas

5.1 Spill Notification Procedures

In the event of a spill of an unknown material and/or Hazardous Material spills, the following procedures should be followed:

- The person who witnesses or identifies the spill should immediately contact the DFW Airport Department of Public Safety (DPS) at 911.
- DPS assesses the spill and reports the quantity to the DFW Airport Operations Center (AOC).
- AOC documents the spill in the Operations Daily Log and notifies the DFW Airport Environmental Affairs Department, Asset Management (AM), and Risk Management.
- If the spill is reportable, the responsible party is required to notify the appropriate agencies within the appropriate time frame. If a responsible party cannot be identified, EAD will notify all appropriate agencies.

In the event spills of known material (both hazardous and non-hazardous) and non-IDLH conditions, the following procedures should be followed:

- The person who witnesses or identifies the spill should immediately contact the DFW Airport Operations Center at (972) 973-3112.
- AOC documents the spill in the Operations Daily Log and notifies the DFW Airport EAD, AM, and Risk Management.
- If the spill is reportable, the responsible party is required to notify the appropriate agencies within the appropriate time frame. If a responsible party cannot be identified, EAD will notify all appropriate agencies.

5.2 Spill Response Procedures

Eliminating the source of a spill and containing the spilled material are the first steps in preventing storm water contamination. A quick response is imperative in preventing further contamination and costly clean-ups. It is the responsibility of the owner of the material that is spilled to contain the hazard and properly dispose of the material in accordance with EPA standards. However, in the event that the owner cannot be identified, DPS will take immediate actions to ensure the safety of all personnel, eliminate the source of the spill, contain the spill, and initiate efforts to mitigate damage. This includes stopping processes and operations, removing ignition sources, containing and collecting released material, and removing or isolating containers. The airport's designated EAD representative will document the spill and response actions.

5.3 Spill Prevention and Response Training

Spill prevention and response training for the P3 plan should include all employees involved in industrial activities, not just those employees on the spill response team.

Training should encompass the following:

- Familiarization with the chemical and physical properties, and the hazards associated with the chemicals handled most frequently;
- Familiarization with designated locations of onsite Material Safety Data Sheet (MSDS) Stations;
- Teaching proper material handling procedures, storage requirements, and ways to prevent spills (e.g. the importance of secondary containment);
- Identification of potential spill areas and the associated sanitary and storm sewer system drainage routes;
- Internal spill notification procedures and DFW Airport notification procedures (e.g., employees should be assured that they will face no reprisals when they report such incidences); and
- Proper clean-up procedures (e.g. employees should be trained on where spill clean-up material are stored, how clean-up materials are applied and disposed).

In summary, all airport tenants will be expected to immediately implement the appropriate spill notification, response, and clean-up actions required in the event of all accidental spills and releases that occur on their leasehold or as result of their operations.

6.0 AIRPORT CONTACTS

Tenant activities have the potential to impact various departments and programs at DFW Airport; therefore, it is imperative that tenants have a direct contact for each individual area. Departments including EAD, Code, and DPS may conduct inspections on a routine basis to ensure airport tenants understand the various airport policies as well as state and local regulations. The following list identifies the individuals or departments responsible for maintaining areas most commonly impacting airport tenants.

<u>JOB AREA/RESPONSIBILITY</u>	<u>CONTACT</u>	<u>TELEPHONE</u>
Airport Development and Engineering (ADE), Main Number (972) 973-1823		
1. Building Code	Jim Cottle	(972) 973-1777
2. Building Design & Construction	Wade McLaren	(972) 973- 1770
Airport Operations (OPS), Main Number (972) 973-3112		
1. Airfield/Aircraft Emergencies	Duty Manager	(972)973-3160
2. Spill Notification	Duty Officer	(972)973-3112
Asset Management (AM) Main Number (972)973-4499		
1. As-Built Drawings and Records	Mark Stapleton	(972) 973-6125
2. International Waste	Kofi Armardi	(972) 973-6211
3. Road and Street Repair	Jim Wardlow	(972) 973-6210
4. Solid Waste and Recycling	Larry Dowis	(972) 973-6212
5. Storm Sewer & Channel Maintenance	Eddie Tovar	(972) 973-6114
Commercial Development		
1. Land Use/ Property Management	Christina Wood	(972)973-4667
2. Industrial Development& Leasing	Mark Witte	(972)973-4657
3. Retail Development & Leasing	Tiffini Miller	(972)973-4647
Customer Service		
1. Terminal A Manager	Marsha Crear	(972)574-0069
2. Terminal B Manager	Robert Hightower	(972)574-0123
3. Terminal C Manager	Jim Kelly	(972)574-2366
4. Terminal D Manager	Charlie Cotner	(972)973-5001
5. Terminal E Manager	Troy Snyder	(972)574-3117

Department of Public Safety (DPS), Main Number (non-emergency) (972)

1. Airport Badging	Kathy Lawton	(972) 973-5100
2. Fire Suppression Marshal	Randie Frisinger	(972) 574-8504
3. Fire Protection Engineer	Todd Haines	(972) 574-8502
4. Law Enforcement	Steven Deel	(972) 574-8488

Environmental Affairs Department (EAD), Main number (972)-973-5560

1. Environmental Concerns/Complaints	Rick Reeter	(972) 973-5560
2. Asbestos & Storm Water Construction	Richard Bosse	(972)973-5564
3. Noise Concerns/Complaints	Sandy Lancaster	(972) 973-5563
4. Storm Water Industrial	Asciatu Whiteside	(972) 973-5582

Energy and Transportation Management (E&TM), Main Number (972) 574-6715

1. Potable Water & Sanitary Sewer	Chuck Morrow	(972)574-4637
2. Thermal Energy, Electricity & Natural Gas	Jerry Dennis	(972)574-2412
3. Vehicle Fleet Services	James Green	(972)574-8977
4. Glycol Collection System	Darrell Campbell	(972)574-5837
5. SkyLink Services	Tomas Rivera	(972)574-1331

7.0 POLLUTION PREVENTION PLAN QUESTIONNAIRE

The following section details the information that must be incorporated into each tenant's onsite P3 Manual. As previously stated, the purpose of the P3 is to ensure airport tenants are familiar with airport policies, environmental regulations, and the various onsite housekeeping practices and BMPs that will be implemented throughout occupancy at DFW Airport. Areas that must be addressed in all P3 Manuals include:

- Company Profile
- Onsite Environmental Contact
- A Facility Map
- Regulatory Requirements
- Major Chemical and Material Handling or Usage
- Material Safety Data Sheets accessible for on-site chemicals
- Good Housekeeping Practices and BMPs to be Implemented
- Onsite Structural Controls and Preventive Maintenance Program
- Employee Training Program

Airport tenants have the option of creating their own P3 Plan which satisfies all of the areas listed above, or tenants can use DFW Airports P3 template. Tenants who choose to utilize the airport's template will customize the plan by incorporating their relevant company's aspects and the various environmental practices that will be implemented throughout occupancy at DFW Airport. If tenants have similar plans in place which include the areas listed above (i.e. A Storm Water Pollution Prevention Plan (SWP3), then that document may be submitted in place of the P3 Plan.

COMPANY PROFILE

1. FACILITY INFORMATION	
Date:	
Company/Facility Name:	
Facility Address:	
Telephone/FAX:	
Approximate Number of Employees:	
Facility Standard Industrial Classification (SIC) codes or Industrial Activity Codes	
Facility Area (acres/sf)	

2. CONTACT INFORMATION	
* Contact Name:	
*Contact Email address:	
Corporate Address:	
Corporate Environmental Contact:	
Corporate Environmental Contact Email Address:	

* Should be an individual familiar with all onsite operations and activities, such as the onsite manager or supervisor

3. SUB-TENANTS

Do you have Sub-tenants? _____ (yes/no)

Note: A sub-tenant only refers to those businesses or entities in which you sub-lease or rent all or portions of your DFW Airport leased areas.

If yes, list Sub-tenant(s), contact information, and activities conducted. (attach additional sheets if necessary)

4. REGULATORY REQUIREMENTS (more detailed information regarding listed regulations is provided in Appendix A)		
Regulation	Applicable (Y/N)	Permit or ID Number
<p>Air Permitting Facilities that have the potential to emit air pollutants must be authorized under a TCEQ air permit. Based on annual emissions (tons per year), the facility can be authorized under a permit-by-rule, standard permit, or New Source Review permit (site specific). These facilities are also required to submit an annual emissions inventory report to TCEQ for criteria pollutant emissions during each calendar year.</p>		
<p>Asbestos Requires building owners/operators to disclose asbestos locations to workers that may come in contact with asbestos containing materials. Building owners/operators are required by DSHS, EPA and OSHA to survey areas at their facilities that will be impacted during the course of work activities. If asbestos containing materials are determined to be present, these materials must be properly managed to minimize/eliminate employee or worker exposure. If response actions regarding asbestos is required, notification to DSHS is required.</p>		
<p>Aboveground Storage Tank/Underground Storage Tank A facility may be subject to registering/self-certifying an underground or aboveground storage tank as well as all other aspects of the regulation, per the TCEQ 30 TAC, Chapter 334 regulations if their facility includes an underground or aboveground tank that holds a regulated product as defined by the 334 regulations.</p>		
<p>CA Process/Storm Water Construction All tenant projects requiring a construction permit as determined by Building Standards will be reviewed by EAD. The tenant will meet with EAD to determine whether a storm water construction permit (TXR150000) will be needed. EAD will provide assistance in completing the proper documentation to begin the construction application process.</p>		
<p>Emergency Planning and Community Right- to-Know Act Establishes reporting requirements for facilities that manage or store specified chemicals. Facilities may be required to submit information to local and state emergency planning committees and the local fire department, and/or submit annual reports to the EPA or TCEQ depending the chemical or the quantity stored onsite.</p>		
<p>Federal Operating Permit Tenant sites which have the potential to emit over 100 tons per year of NOx or VOC pollutants are required to obtain a Title V Federal Operating Permit issued by TCEQ. These sites must aggregate emissions from all facilities to determine applicability; facility operations may start when the permit is issued. Annual TCEQ compliance certification reporting will apply for these sites.</p>		
<p>Hazardous Waste Generator Tenants that produce, transport, or possess a hazardous waste are regulated under TCEQ and EPA rules . Hazardous waste is</p>		

<p>defined as any solid waste identified or listed as a hazardous waste by the the EPA. Hazardous wastes may be toxic, corrosive, reactive, or ignitable, thus presenting a danger to human health and the environment.</p>		
<p>Pretreatment Tenant facilities are required to complete the DFW Industrial Wastewater Survey to allow EAD to identify and locate all possible Industrial Users which might be subject to the EPA and TCEQ Pretreatment Program. Tenants with applicable industrial activities will be subject to permitting/reporting requirements.</p>		
<p>PCB's Tenant facilities that use/dispose of PCB containing substances are regulated by EPA rules. Substances that may contain PCB's include, but are not limited to: dielectric fluids; solvents; oils; waste oils; heat transfer fluids; hydraulic fluids; paints or coatings; sludges; slurries; sediments; dredge spoils .</p>		
<p>Spill Control and Countermeasures The primary purpose of SPCC is to establish first response procedures, methods, and spill equipment for specific locations (bulk fuel storage areas) around DFW Airport in order to prevent the discharge of petroleum products and solvents from non-transportation related activities into the DFW Airport storm sewer system or the waters of the U.S., creeks and watersheds. A Spill Plan is required for facilities at DFW Airport that store over a 1320 gallon aboveground capacity of a petroleum substance.</p>		
<p>Texas Pollutant Discharge Elimination System, Multi-Sector General Permit (TPDES MSGP) : All tenants are responsible for implementing good housekeeping and best management practices on a daily basis. Tenant facilities that discharge storm water associated with industrial activity may need to obtain a TPDES MSGP from the Texas Commission on Environmental Quality (TCEQ).</p>		

8. ONSITE STRUCTURAL CONTROLS AND PREVENTIVE MAINTENANCE (PM) PROGRAM: Identify all onsite structural controls and a detailed description of the associated PM program to be conducted by the tenant (ex. Motor oil, gasoline, diesel, glycol, clorax)	
Structural Control & Location	PM Program
Example: 1,000-gallon oil/water separator, 80 ft east of building	Inspected monthly and cleaned quarterly by Waste Services inc.

9. GOOD HOUSEKEEPING PRACTICES: Place an "X" by each good housekeeping practices that will be implemented throughout occupancy at DFW Airport.	
Good Housekeeping Practice	"X"
Inside floors are to be kept clear of debris and spills and are to be swept or mopped regularly	
Walkways, aisles, roadways and exits are to be kept clear at all times.	
Material and products are stored in a neat and orderly fashion with particular attention not to block walkways or access routes	
Small spills are to be cleaned up immediately and disposed of in an approved manner	
Exterior areas will cleaned regularly to prevent accumulation of trash and debris	
Loading/Unloading areas will be cleaned regularly to prevent accumulation of trash and debris	
Solid Waste Container lids will remain closed when not in use	
No trash will be stored on the ground outside of solid waste containers	
Chemical containers are to be stored in enclosed or covered areas whenever possible to minimize contact with storm water	
All chemical storage containers are to be properly labeled	
Empty drums are to be placed only in their designated area and label as "empty"	
Chemical containers and/or drums are to be kept closed at all times when not in use	
All refuse is to be placed in an appropriate container	
Tools and equipment are to be kept clean and neatly stored when not in use	

10. BEST MANAGEMENT PRACTICES (BMP): Place an "X" by each BMP that will be implemented throughout occupancy at DFW Airport.	
BMPs	"X"
Identify and clearly label all storm drain inlets	
Frequently inspect storm sewer inlets; remove and appropriately dispose loose solids, trash, or debris.	
Store all exterior drums, containers, and batteries on spill pallets to minimize contact with storm water and contain potential spills and/or leaks	
Regularly inspect chemical storage areas and the condition of chemical containers	
Regularly inspect and clean/empty secondary containment structures	
Do not hose down work areas; only use dry cleaning methods	
Use covered dumpsters and keep them closed or locked when not in use	
Place waste in plastic bags prior to disposing to prevent leakage	
Completely drain liquid waste from containers prior to disposing	
Stage solid waste containers away or downstream from storm drain inlets	
Regularly sweep or clean areas near solid waste containers to reduce litter	
Perform regular housekeeping (cleaning or sweeping) near waste containers in order to maintain a clean and orderly condition	
Divert runoff away from fueling or other high traffic areas	
Incorporate native vegetation into landscaping in order to reduce irrigation and exterior chemical usage.	
Incorporate landscaping or vegetation in areas where erosion concerns are evident	
Regularly clean paved areas and high traffic areas	
Limit use of harmful pesticides, herbicides, and fertilizers	
Cover or berm storm drain inlets when conducting exterior vehicle, pavement, or building cleaning operations to ensure adequate collection and disposal of generated wash water	
Divert water to grassy areas during potable water system flushing instead of directly into storm drain systems	
Inspect vehicle and equipment staging areas regularly; and move leaking vehicles or equipment indoors (or utilize drip pans) until repairs can be made	
Conduct equipment and vehicle maintenance indoors	
Establish a regular inspection and maintenance schedule for all structural controls	
Collect and test fire suppression waters prior to disposing to the sanitary sewer	
Cover scrap metal containers when not in use	
Train employees on proper spill response and reporting procedures	
Maintain an adequate supply of spill response equipment at all times	

11. SPILL RESPONSE AND REPORTING

Eliminating the source of a spill and containing the spilled material are the first steps in preventing storm water contamination. A quick response is imperative in preventing further contamination and costly clean ups. It is the responsibility of the owner of the material that is spilled to contain the hazard and properly dispose of the material in accordance with EPA standards. However, in the event that the owner cannot be identified, DPS will take immediate actions to ensure the safety of all personnel, eliminate the source of the spill, contain the spill, and initiate efforts to mitigate damage. This includes stopping processes and operations, removing ignition sources, collecting and containing released material, and removing or isolating containers.

In the event of a spill of an unknown material and/or Hazardous Material, the following procedures should be followed:

- The person who witnesses or identifies the spill should immediately contact the DFW Airport Department of Public Safety (DPS) at 911.
- DPS assesses the spill and reports the quantity to the DFW Airport Operations Center (AOC).
- AOC documents the spill in the Operations Daily Log and notifies the DFW Airport Environmental Affairs Department, AM, and Risk Management.
- If the spill is reportable, the responsible party is required to notify the appropriate agencies within the appropriate time frame. If a responsible party cannot be identified, EAD will notify all appropriate agencies.

In the event spills of known material (both hazardous and non-hazardous) and non-IDLH conditions, the following procedures should be followed:

- The person who witnesses or identifies the spill should immediately contact the DFW Airport Operations Center at (972) 973-3112.
- AOC documents the spill in the Operations Daily Log and notifies the DFW Airport Environmental Affairs Department, AM, and Risk Management.
- If the spill is reportable, the responsible party is required to notify the appropriate agencies within the appropriate time frame. If a responsible party cannot be identified, EAD will notify all appropriate agencies.

In addition to contacting the AOC, reportable releases must also be reported to the appropriate state and local authorities as soon as the release occurs but no more than 24 hours after the release. Tenants must contact the Texas Commission on Environmental Quality

(TCEQ) at (817)588-5800 or (512)463-7727 for after hour and weekend releases. Any quantity of petroleum products released to waters of the state must also be reported to the National Response Center (NRC) at 1(800)-424-8802. Responsible parties must also submit a Written Release Report to the TCEQ within 30 days of the original release. State and local authorities require that the following information be provided for all reportable releases:

- The responsible party (individual, company, etc...)
- The quantity of the releases substance
- The date and time of the release
- The address or location of the release

Additional information regarding spill reporting requirements can be found in 30 TAC 327.3 Releases into the sanitary sewer system must be reported to the Trinity River Authority at (972)331-4336 and must also be reported to the TCEQ at (817)588-5800

12. EMPLOYEE TRAINING

An Employee Pollution Prevention Training Program is necessary to effectively communicate the components of pollution prevention. Spill prevention and response training for the P3 plan should include all employees involved in industrial activities, not just those employees on a spill response team. When properly trained, personnel are more capable of preventing spills, by responding safely and effectively to an incident, and by recognizing situations that could lead to storm water contamination. Training should encompass the following:

- Familiarization with good housekeeping measures and BMPs identified in this document
- Proper material management and handling practices for specific chemicals, fluids, and other materials used or commonly encountered at the facility
- Familiarization with the chemical and physical properties, and the hazards associated with the chemicals handled most frequently;
- Identification of potential spill areas and the associated sanitary and storm sewer system drainage routes;
- Internal spill notification procedures and DFW Airport notification procedures (e.g., employees should be assured that they will face no reprisals when they report such incidences); and
- Proper clean-up procedures (e.g. employees should be trained on where spill clean-up material are stored, how clean-up materials are applied and disposed).

- Knowledge of which non-storm water discharges can be discharged into a storm water collection system or receiving water (i.e. potable water, irrigation water, etc.), and which non-storm water discharges must be collected and appropriately disposed (vehicle wash water, process wastewater, sanitary sewer, etc...)

Suggestions of training tools that can be included in the training programs are:

- Films and slide presentations
- Drills/Field exercises
- Routine employee meetings
- Bulletin boards
- Suggestion boxes
- Newsletters

Tenants are responsible for providing and documenting storm water training to their respective employees and for maintaining written records of the training. DFW Airport has provided in a template storm water training presentation, located in Appendix B, which incorporates the training topics previously listed. Tenants may choose to incorporate this training tool into their training program, or provide another training resource for their employees. It is recommended that storm water training records either be filed for each employee individually, or according to the training topic (i.e. environmental, health & safety).

Direct any questions or concerns either to:

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Return Completed P3 Plan to:

DFW International Airport
Environmental Affairs Department
Attn: Tiffany Moss
P.O. Box 619428
DFW Airport, TX 75261