



# Pollution Prevention Programs

PRESENTED BY:

CITY OF DALLAS

OFFICE OF ENVIRONMENTAL QUALITY  
AND SUSTAINABILITY

STORMWATER MANAGEMENT

# EPA Consent Decree

2004 EPA and DOJ sue COD for violations of CWA and RCRA

2006 EPA, DOJ and COD enter into a Consent Decree

The Consent Decree required

- Implementation of a certified ISO 14001 Environmental Management System (EMS)
- Inspections of the City's general services fueling and maintenance operations for compliance to the used oil program

# City's Actions as Result of Consent Decree

- ▶ Created the Office of Environmental Quality (OEQ)
- ▶ Created the City Spill Response Team (SRT)
- ▶ Implemented an EMS – Certified ISO 14001:2015
- ▶ Created Administrative Directives 3-73 & 3-74

# Environmental Management System

- ▶ Adopt an environmental policy
- ▶ Develop a systemic approach to manage environmental concerns
- ▶ Identify how the City's activities interact with the environment
- ▶ Develop and implement procedures and other controls to limit the impacts our activities have on the environment

# Administrative Directives

## AD 3-73

- Implemented environmental management programs
- Requires environmental incidents be investigated to determine preventability
- Created the Environmental Compliance Committee

## AD 3-74

- Established spill response procedures
- Requires City departments report all spills that are 1 gallon or more to OEQ
- Requires OEQ to respond and ensure spill is properly cleaned

# City Spill Response Team

- ▶ Responds to City Spills
  - ▶ Departments are required to report all spills 1 gallon or more or that enter a water of the State, storm drain, sanitary sewer
  - ▶ Investigates preventability of each spill
- ▶ Conducts Inspections on City Facilities
  - ▶ All “Consent Decree” facilities – Major service centers
  - ▶ 22 Additional facilities
    - ▶ Golf Courses
    - ▶ Water Treatment Plants
    - ▶ Landfill and Transfer Stations

# Spill Response

- ▶ Respond to all spills over 1 gallon
- ▶ Ensure proper clean up
- ▶ Investigate all spills for preventability
- ▶ Refer all spills deemed preventable to Environmental Compliance Committee





# Sanitation Truck Hydraulic Oil Spill



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# Environmental Compliance Committee

- ▶ Comprised of environmental staff of various departments throughout the City
- ▶ Reviews each spill determined to be preventable
- ▶ May recommend points be assigned to responsible employee
  - ▶ Points are cumulative over a 24-month period and may result in disciplinary action
- ▶ May recommend corrective actions for the department to prevent future occurrences
- ▶ Departments are required to respond with actions taken



# Facility Inspections

- ▶ Conduct 816 inspections per year
- ▶ Track each issue
- ▶ Follow up each month and document if the issue was corrected
- ▶ Procedure for escalating issues that have not been corrected





Spills observed on lot



Lot after inspection





Leaves and trash  
obstructing storm drain





Drain after inspection





Scrap tires stored outside  
uncovered



Scrap tires removed





# Lessons Learned

- ▶ Facility Inspections
  - ▶ Need to communicate issues that were observed during the inspection to the appropriate person
  - ▶ Follow up on inspections or issues will not be corrected
  - ▶ Track the status of each issue until it is corrected
- ▶ Spills
  - ▶ Improved maintenance has reduced the number of spills significantly

# Questions?

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