Caldwell Industrial Airport

Stormwater Pollution Prevention Plan

(SWPPP)

In accordance with NPDES Permit No. IDR-050007

Updated August 2021

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Acronyms

BMP	Best Management Practice
CCED	City of Caldwell Engineering Department
CCPW	City of Caldwell Public Works
CCSD	City of Caldwell Street Department
CGP	Construction General Permit
CFR	Code of Federal Regulations
CSDC	Construction Site Discharge Control
CWA	Clean Water Act
EPA	Environmental Protection Agency
ERP	Enforcement Response Policy
ESC	Erosion and Sediment Control
GIS	Geographic Information System
GSI	Green Stormwater Infrastructure
IDDE	Illicit Discharge Detection Elimination
IDEQ	Idaho Department of Environmental Quality
LA	Load Allocation
LID	Low Impact Development
MEP	Maximum Extent Practicable
MSGP	Multi Sector General Permit
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
OVIP	Outfall Verification and Identification Program
PCSM	Post Construction Stormwater Management
PMEP	Program Monitoring and Evaluation Plan
PoC	Pollutant of Concern
QAP	Quality Assurance Plan
QC	Quality Control
ROW	Right of Way
SOP	Standard Operating Procedure
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan

TMDL	Total Maximum Daily Load
TSS	Total Suspended Solids
UA	Urbanized Area
USACOE	United States Army Corps of Engineers
USGS	United States Geological Survey
WLA	Waste Load Allocation
WOTUS	Waters of the United States

Definitions

Authorized Enforcement Agent	The City of Caldwell's Director of Public Works and/or any individual designated by the Director of Public Works as an authorized enforcement agent.
Best Management Practices (BMP)	Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of "Waters of the United States". BMPS also include treatment requirements, operating procedures, and practices to control site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.
Caldwell Municipal Stormwater Management Manual	The most recently adopted version of the design standards manual prepared by the Caldwell public works department which provides design, performance, and review criteria for stormwater management practices.
Caldwell Non-stormwater Disposal Best Management Practices	Best management practices adopted by reference by the City of Caldwell Municipal Code 13.01 for non-stormwater disposal.
Clean Water Act (CWA)	Federal water pollution control act enacted by public law 92-500 as amended by public laws 95-217, 95-576, 96-483, and 97-117; 33 USC 1251 et seq.
Control Measure	Any stormwater control or other method (including narrative effluent limitations) used to prevent or reduce the discharge of pollutants to Waters of the United States.
Corrective Action	Any action taken, or required to be taken, to repair, modify, or replace any stormwater control used at the site; (2) clean up and dispose of spills, releases, or other deposits found on the site; (3) remedy a permit violation.
Development	Any construction, reconstruction, conversion, structural alteration, relocation, or enlargement of any structure within the jurisdiction of the Caldwell Industrial Airport as well as any manmade change or alteration to the landscape, including, but not

	limited to, mining, drilling, dredging, grading, paving, excavating, and filling.
Discharge	Any addition or introduction of any pollutant, stormwater, or any other substance into the Caldwell Industrial Airport drainage network, waters of the state, or into waters of the United States.
Discharge Point	The location where collected and concentrated stormwater flows are discharged from the facility such that the first receiving waterbody into which the discharge flows, either directly or through a separate storm sewer system, is a Water of the United States.
Effective Operating Condition	A stormwater control is kept in effective operating condition if it has been implemented and maintained in such a manner that it is working as designed to minimize pollutant discharge.
Facility or Activity	Any NPDES "point source" (including land or appurtenances thereto) that is subject to regulation under the NPDES program. See 40 CFR 122.2.
Federal Operator	Any entity that meets the definition of "Operator" in the MSGP permit and is either any department, agency or instrumentality of the executive, legislative, and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality.
Historic Property	As defined by the National Historic Preservation Act regulations means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.
Illicit Connection	Any physical connection to a publicly maintained storm drain system composed of non-stormwater which has not been permitted by the public entity responsible for the operation and maintenance of the system.
Illicit Discharge	Any discharge to a storm drain system that is not composed entirely of stormwater except discharges pursuant to an NPDES permit.
Impaired Water	Waters identified by a state, tribe, or EPA as not meeting an applicable water quality standard, and require development of a total maximum daily load (TMDL) (pursuant to Section 303(d) of the CWA), or are addressed by an EPA-approved or established TDML, or are covered by pollution controls requirements that met the requirements of 40 FR 130.7(b)(1). For discharges that enter a

	separate storm sewer system prior to discharge, the first Water of the United States to which you discharge is the waterbody that receives the stormwater discharge from the storm sewer system.
Impervious Surface	A surface which prevents or highly resists the infiltration of water into the ground, including, but not limited to, roofs, sidewalks, patios, driveways, parking lots, concrete and asphalt paving, gravel, compacted native surfaces and earthen materials, and oiled, macadam, or other surfaces which similarly impede the natural infiltration of stormwater.
Industrial Activity	The 10 categories of industrial activities included in the definition of “stormwater discharges associated with industrial activity” as defined in 40 CFR 122.26(b)(14)(i)- and (xi).
Measureable Storm Event	A precipitation event that results in a measurable amount of precipitation (i.e., a storm event that results in actual discharge) and that follows the preceding storm event by at least 72 hours (3 days). The 72-hour storm interval does not apply if you document that less than a 72-hour interval is representative for local storm events.
Municipal Separate Storm Sewer System (MS4)	A conveyance or system of conveyance (including roads with drainage systems, municipal streets, catch basin, curb, gutters, ditches, manmade channels, or storm drains) owned or operated by a public body (created under state law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as sewer district, flood control district or drainage district, or similar entity that discharges to the waters of the United States and which are not part of a publicly owned treatment works ("POTW") as defined at 40 CFR section 122.2.
National Pollutant Discharge Elimination System (NPDES) Permit	A permit issued by the U.S. EPA, region X, in compliance with the federal clean water act for the discharge of pollutants from any point source into the waters of the United States.
No Exposure	All industrial materials or activities protected by a storm-resistant shelter to prevent exposure to rain, snow, snowmelt and/or runoff. See 40 CFR 122.26(g)
Non-stormwater Discharge	Discharges that do not originate from storm events. They can include, but are not limited to, discharges of process water, air conditioner condensate, non-contact cooling water, pavement wash water, external building wash-down, irrigation water, or uncontaminated groundwater or spring water.
Notice of Intent (NOI)	The form (electronic or paper) required for authorization of coverage under the Multi-Sector General Permit.
Notice of Termination (NOT)	The form (electronic or paper) required for terminating coverage under the Multi-Sector General Permit.

Operator	Any entity with a stormwater discharge associated with industrial activity that meets either of the following two criteria: 1. The entity has operational control over industrial activities, including the ability to make modifications to those activities; or 2. The entity has day-to-day operational control of activities at a facility necessary to ensure compliance with the permit (e.g.; the entity is authorized to direct workers at a facility to carry out activities required by the permit).
Outfall	See "Discharge Point"
Owner	The owner of any facility or activity subject to regulation under the federal NPDES program including operational and day to day control over facility activities.
Point Source	A discernable, confined, discreet conveyance to a surface Water of the United States. See 40 CFR 122.2.
Pollutant	Dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials (except those regulated under the atomic energy act of 1954, as amended [42 USC 2011 et seq.]), heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water, and as otherwise defined in 40 CFR 122.2.
Qualified Personnel	Qualified personnel are those who are knowledgeable in the principles and practices of industrial stormwater controls and pollution prevention, and who possess the education and ability to assess conditions at the industrial facility that could impact stormwater quality, and the education and ability to assess the effectiveness of stormwater controls selected and installed to meet the requirements of the permit.
Spill	The release of a hazardous or toxic substance from its container or containment.
Storm Event	A precipitation event that results in a measurable amount of precipitation.
Stormwater	Water runoff and surface drainage associated with rainstorm events and snowmelt. See 40 CFR 122.26(b)(13).
Stormwater Discharges Associated with Industrial Activity	The discharge from any conveyance that is used for collecting and conveying stormwater and that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant. The term does not include discharges from facilities or activities excluded from the NPDES program under Part 122. For the categories of industries identified in this section, the term includes, but is not limited to, stormwater discharges from industrial plant yards; immediate access roads and rail lines used

	or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters (as defined at part 401 of this chapter); sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and final products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to stormwater. For the purposes of this paragraph, material handling activities include storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product, by-product or waste product. The term excludes areas located on plant lands separate from the plant's industrial activities, such as office buildings and accompanying parking lots as long as the drainage from the excluded areas is not mixed with stormwater drained from the above described areas. Industrial facilities include those that are federally, state, or municipally owned or operated that meet the description of the facilities listed in 40 CFR 122.26(b)(14). The term also includes those facilities designated under the provisions of 40 CFR 122.26(a)(1)(v). See 40 CFR 122.26(b)(14).
Stormwater Management	The process of collection, conveyance, storage, treatment, and disposal of stormwater to ensure control of the magnitude and frequency of runoff and to minimize the hazards associated with flooding. Also includes implementing controls to reduce the discharge of pollutants including management practices, control techniques and systems, design and engineering methods.
Stormwater Pollution Prevention Team	The stormwater pollution prevention team is responsible for overseeing development of the SWPPP, any modifications to it, and for implementing and maintaining stormwater control measures and taking corrective actions when required. Each member of the stormwater pollution prevention team must have ready access to either an electronic or paper copy of applicable portions of this permit, the most updated copy of your SWPPP, and other relevant documents or information that must be kept with the SWPPP. The individuals on the “Stormwater Team” must be identified in the SWPPP.
Total Maximum Daily Loads (TMDL)	The sum of the individual wasteload allocations (WLAs) for point sources and load allocations (LAs) for nonpoint sources and natural background. If receiving water has only one point source discharger, the TMDL is the sum of that point source WLA plus the LAs for any nonpoint sources of pollution and natural background sources, tributaries, or adjacent segments. TMDLs can be expressed in terms of either mass per time, toxicity, or other

	appropriate measure. (See section 303(d) of the Clean Water Act and 40 CFR 130.2 and 130.7).
Waters of the State	As defined in Idaho Code 39-103(18): All the accumulations of water, surface and underground, natural and artificial, public and private, or parts thereof which are wholly or partially within, which flow through or border upon the state except for private waters as defined in section 42-212, Idaho Code.
Waters of the United States	Waters as defined in 40 CFR 122.2.
Wetland	An area that is inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances does support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

Record of SWPPP Modifications

The City of Caldwell Engineering Department and Caldwell Airport Manager may make minor edits or changes directly to this plan. The dates of any revision should be noted below.

Revision Date	Individuals Making Changes	Summary of Changes to SWPPP
12/18/2009	Lee Van De Bogart	Initial SWPPP draft
1/10/2011	Lee Van De Bogart	Updated Facility Operator contact information
3/17/2016	Lee Van De Bogart	Update Facility Operator contact information, responsible Stormwater person, adding permit tracking number, added TMDL information for receiving waters.
1/15/2020	Ashley Newbry	Developed new SWPPP using updated template, expanded SWPPP contents to more comprehensively describe ongoing activities at the Facility.
10/14/2020	Ashley Newbry	Updated SWPPT table with new Individual Responsibilities; provided additional information for Spill Prevention and Response Plan & Erosion and Sediment Control sections.
1/15/2021	Ashley Newbry / Emily Johnson	Updated Erosion and Sediment Control, Employee Training, Routine Facility Inspections, Quarterly Visual Inspections, and Monitoring sections.
8/30/2021	Ashley Newbry / Emily Johnson	Developed new SWPPP to reflect the updated requirements of the 2021 MSGP.

Section 1. Facility Description and Contact Information

1.1 *Introduction*

This Stormwater Pollution Prevention Plan has been prepared for the Caldwell Industrial Airport (Facility), which is owned by the City of Caldwell, Idaho (Owner) and administered/operated by the Caldwell Airport Commission (Airport Authority), as an update and replacement for the existing SWPPP in place for the Facility. The Caldwell Industrial Airport is comprised of the Owner and various tenants who have lease agreements with the Owner to conduct operations onsite.

This SWPPP has been prepared in coordination with the Owner, Airport Authority, tenants, and operators as designated in the Multi Sector General Permit definition. It is drafted in accordance with the requirements of the United States Environmental Protection Agency (U.S. EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit 2015 (MSGP) for Stormwater Discharges Associated with Industrial Activity. The Facility is seeking coverage under the 2021 MSGP.

The Airport Authority serves as the primary operator for the Facility as a whole. Based on the activities conducted onsite (e.g., aircraft rehabilitation, mechanical repairs, painting, fueling, lubrication), some tenants also qualify as operators under the MSGP and need coverage under the MSGP or a No Exposure exemption from coverage, as further discussed in the Responsible Parties section of this SWPPP and in the MSGP. These tenant-Operators meet the MSGP definition of "Operator", as they have operational control of the industrial activities implemented by their commercial or industrial business. The majority of tenants do not qualify as operators, and will simply be referred to as "tenants" in this document. As the tenants do not have operational control over the industrial activities at the Facility, actions to correct potential stormwater concerns related to a tenant will be managed by the Airport Authority.

The City of Caldwell has developed this document with the intent that it will serve as the SWPPP for the Airport Authority and the overall operations of the Facility, as well as tenant-operators and tenants, as the MSGP requires a comprehensive SWPPP to cover all operations and operators. All qualifying tenant-operators were provided multiple opportunities to contribute to and comment on this comprehensive document, as well as SWPPP contribution documents developed for each tenant-operator, included as Appendix B. The Airport Authority is responsible for the implementation of this SWPPP as it pertains to the Facility's operations. Tenant-operators are responsible for the implementation of the SWPPP as it pertains to their individual operations, as described in the SWPPP contribution documents.

The major objective of this SWPPP is to prevent or minimize the potential for pollution of stormwater from industrial activities, and the subsequent impact on surface waters from polluted discharges, through the implementation of best management practices, stormwater

controls, prompt maintenance, and corrective actions. This SWPPP shall act as a living document, documenting activities and changes within the Facility, as they pertain to the prevention of stormwater pollution.

1.2 *Regulatory History and Facility Applicability*

The Federal Water Pollution Control Act of 1948 was the first major U.S. law to address water pollution. The Act, which has become commonly known as the Clean Water Act (CWA), was intensively amended in 1972, in response to increasing public concern for the environment and the condition of the nation's waters. The 1972 amendment prohibited any discharge of pollutants to waters of the U.S. without coverage under a National Pollutant Discharge Elimination System (NPDES) Permit. The Clean Water Act was further amended in 1987, adding Section 402(p), which establishes a framework for regulating municipal and industrial discharges of stormwater under the NPDES program. Industrial facilities are regulated under the NPDES program because material handling and storage, equipment maintenance and cleaning, and other activities at industrial facilities are often exposed to stormwater. Stormwater runoff that comes in contact with these activities can transport pollutants to nearby surface waters, degrading water quality.

The U.S. Environmental Protection Agency (EPA) developed a generalized NPDES permit to be used for industrial facilities seeking coverage: the Multi-Sector General Permit (MSGP). Industrial activities are classified by EPA in eleven categories, ten of which are covered under the MSGP (construction activities, the eleventh category, are regulated under their own permit). Each category includes minor changes in permitting requirements to meet sector-specific needs and concerns. Category Eight of the MSGP covers "Transportation facilities that have vehicle maintenance, equipment cleaning, or airport deicing operations," and is the category under which the Caldwell Industrial Airport is regulated and permitted. Specifically, the Facility is regulated under the MSGP as "Sector S – Air Transportation Facilities." The MSGP requires the Facility to continually maintain and update a Stormwater Pollution Prevention Plan to manage stormwater discharge from the site.

Additional consideration of stormwater discharge is required due to the receiving waters of the site. Stormwater from the Facility is discharged to groundwater, the East Caldwell Drain (a tributary to Indian Creek), and Indian Creek. Indian Creek, located within the Lower Boise River Subbasin, is listed on the Federal 303(d) list of impaired waters. The segment of Indian Creek that runs through the City of Caldwell and receives stormwater drainage from the Caldwell Industrial Airport is the segment from Sugar Avenue to Boise River, which has the waterbody identification: ID17050114SW002_04. This segment is impaired, as it does not meet the standards of its designated use categories: Cold Water Aquatic Life and Secondary Contact Recreation.

Indian Creek has a Total Maximum Daily Load (TMDL) established for E. Coli and Sedimentation/Siltation, and needs additional TMDLs for "Temperature" (for impairment to

Cold Water Aquatic Life designated use), according to the Idaho DEQ Integrated Report 2020. The TMDLs established for Indian Creek establish additional restrictions on the quality of stormwater discharged from the Facility, as explained in greater detail throughout this SWPPP.

1.3 *Facility Information*

The Caldwell Industrial Airport airfield is located on Aviation Way, between Ustick Road and East Linden Street, just east of Interstate 84, in the City of Caldwell, Idaho. The Facility consists of 460 acres of land, of which 330 are classified as industrial activity areas exposed to stormwater and discharge stormwater to groundwater, Indian Creek, and the East Caldwell Drain which ultimately discharges to Indian Creek.

Facility Information

Name of Facility: **Caldwell Industrial Airport**

Street: **4184 E Linden St**

City: **Caldwell** State: **Idaho** ZIP Code: **83605**

County or Similar Subdivision: **Canyon County**

NPDES ID (i.e., permit tracking number): **IDR050007** (if covered under a previous permit)

Primary Industrial Activity SIC code, and Sector and Subsector (2015 MSGP, Appendix D and Part 8): **Sector S1: Air Transportation Facilities; SIC Code or Activity Code = 4512-4581**

Co-located Industrial Activity(s) SIC code(s), Sector(s) and Subsector(s) (2015 MSGP, Appendix D): **From NAICS Manual: "Sector 481 Air Transportation" and "Subsector 48121 Non Scheduled Air Transportation"**

The facility is presently active, staffed, and industrial activities are ongoing.

Latitude/Longitude

Latitude: 43.647954 º N (decimal degrees)

Longitude: 116.838187 º W (decimal degrees)

Method for determining latitude/longitude (check one):

☐USGS topographic map (specify scale:_____) ☐GPS

☒Other (please specify): City of Caldwell GIS Webmap

Horizontal Reference Datum (check one):

☐NAD 27 ☒NAD 83 ☐WGS 84

Is the facility located in Indian country? ☐Yes ☒No

If yes, name of Reservation, or if not part of a Reservation, indicate "not applicable."_____

Not Applicable

Are you considered a "federal operator" of the facility?

Federal Operator – an entity that meets the definition of "operator" in this permit and is either any department, agency or instrumentality of the executive, legislative and judicial branches of the Federal government of the United States, or another entity, such as a private contractor, operating for any such department, agency, or instrumentality.

☐Yes ☒No

Estimated area of industrial activity at site exposed to stormwater: **330** acres

Discharge Information

Does this facility discharge stormwater into a municipal separate storm sewer system (MS4)? ☐Yes ☒No

If yes, name of MS4 operator: _____

Name(s) of surface water(s) that receive stormwater from your facility:

Indian Creek or East Caldwell Drain, then Indian Creek

Does this facility discharge industrial stormwater directly into any segment of an "impaired water" (see definition in 2015 MSGP, Appendix A)? ☒Yes ☐No

If Yes, identify name of the impaired water(s): **Indian Creek > Boise River**

Identify the pollutant(s) causing the impairment(s): **Total Phosphorus, TSS, E. Coli**

Which of the identified pollutants may be present in industrial stormwater discharges from this facility?

Total Phosphorus, TSS, E. Coli

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants? If yes, please list the TMDL pollutants: **Yes, Total Phosphorus, TSS, and E.Coli.**

Does this facility discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water (see definitions in 2021 MSGP, Appendix A)? ☐Yes ☒No

Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2021 MSGP Table 1-1)? ☒Yes ☐No

If Yes, which guidelines apply?

Total Phosphorus: 0.1 mg/L May 1 to September 30; 0.35 mg/L October 1 to April 30

TSS: 20 mg/L

E. Coli 126 cfu/100 mL

1.4 *Contact Information / Responsible Parties*

Caldwell Industrial Airport is owned and operated by the City of Caldwell (Owner). The Airport Authority acts on behalf of the Owner. Contact information for representatives of the Owner and Airport Authority are listed in this section. Contact information for all tenants is included in Appendix D of this document.

Each tenant and operator shall be responsible for environmental compliance measures for their own operations and fueling activities. This document does not relieve any tenant from legal requirements they have for environmental compliance associated with their own activity.

Under the MSGP, all operators at the Facility are required to obtain coverage under the MSGP by submitting a Notice of Intent to the Idaho Department of Environmental Quality (as of July 1, 2021). Operators under the MSGP are defined as those who have operation control over the industrial activities conducted at their facility (e.g., vehicle or aircraft maintenance, cleaning, painting, fueling, de-icing). Pilots who work on their own planes for personal use and do not offer a maintenance business would not qualify as industrial operators.

Any operator that ensures all industrial materials or activities are protected by a storm-resistant shelter to prevent exposure to rain, snow, snowmelt and/or runoff may file a No Exposure Certification under the MSGP through Idaho DEQ.

Facility Owner:

Name: City of Caldwell
Address: 411 Blaine Street (City Hall)
City, State, Zip Code: Caldwell, ID 83605
Telephone Number: 208-459-9779
Email address: roates@cityofcaldwell.org

Facility Operator:

Name: Caldwell Airport Commission, C/O Rob Oates, Airport Manager
Address: 4814 E. Linden St.
City, State, Zip Code: Caldwell, ID 83605
Telephone Number: 208-459-9779
Email address: roates@cityofcaldwell.org

SWPPP Contacts:

SWPPP Contact Name (Primary): Emily Johnson, Env. Engineer, Stormwater Program
Telephone Number: 208-455-4687
Email address: ejohnson@cityofcaldwell.org

SWPPP Contact Name (Secondary): Ashley Newbry, Asst. City Engineer, Stormwater
Telephone Number: 208-455-4672

Email address: anewbry@cityofcaldwell.org

Caldwell Engineering Department
621 Cleveland Blvd.
Caldwell, ID 83605

Tenant Operators:

Name: Midfield Aviation
Contact Name: Joe Dory
Telephone Number: 760-247-5766
Email address: joedoryaviation@gmail.com

Name: Silverhawk Aviation
Contact Name: Catherine Weber
Telephone Number: 208-453-8577
Email address: catherine@silverhawkaviation.net

Name: Vintage Airframes
Contact: Michael Breshears
Telephone Number: 208-412-6812
Email address: mike@vintageairframes.com

Name: Cascade Aircraft Management [No Exposure]
Contact Name: Lee Brinley
Telephone Number: 630-688-7420
Email address: lab@leebrinley.com

Name: Flight Doctor West, LLC [No Exposure]
Contact Name: Tim Charles
Telephone Number: 208-455-9350
Email address: tim@turbinesllc.com

Name: Dell Aero Speed [No Exposure]
Contact Name: Delbert Francis Coller III
Email address: dellaerospeed@gmail.com

Name: Performance Air [No Exposure]
Contact Name: Steven Tubbs
Email address: sjbeckett@performanceair.com

1.5 *Stormwater Pollution Prevention Team*

The following table lists the members of the Caldwell Industrial Airport's Stormwater Pollution Prevention Team (SWPPT). Team members are subject to change all changes to this roster will be documented in the Record of SWPPP modifications. As required by the MSGP, each SWPPT member has ready access to an electronic or paper copy of the SWPPP and the MSGP.

Table 1. *Stormwater Pollution Prevention Team*

Staff Names	Phone Numbers	Individual Responsibilities
Ashley Newbry Assistant City Engineer	O: 208-455-4672 C: 208-919-8327	Engineer supervising compliance activity of the City of Caldwell stormwater programs. Coordinates with operator-tenants.
Emily Johnson Environmental Engineer	O: 208-455-4687 C: 208-484-7243	Conducts storm event sampling, quarterly facility inspections, updates SWPPP and supporting documents. Coordinates with operator-tenants.
Engineering Technician	208-455-3006	Assistant role for inspections and storm event sampling
Brent Orton Public Works Director	(208)455-4734	Oversight of Public Works departments, including Airport and Engineering Department.
Rob Oates Airport Manager	208-459-9779	Oversight of airport management; liaison between the City and airport tenants.
Robb MacDonald City Engineer	208-455-3006	Oversight of City Engineering Department.
Joe Dory Midfield Aviation (Operator Tenant)	760-247-5766	Responsible for registering for coverage under the MSGP and for adhering to the SWPPP and carrying out stormwater pollution prevention activities as described therein.
Catherine Weber **Kyle Branscombe** Silverhawk Aviation (Operator Tenant)	O: 208-453-8577 C: 208-794-1515 Kyle: 208-867-1494	
Mike Breshears Vintage Airframes (Operator Tenant)	208-412-6812	
Lee Brinley Cascade Aircraft Management (Tenant – No Exposure)	C: 630-688-7420 O: 208-649-5106	Responsible for filing and maintaining No Exposure Certifications with IDEQ. Guarantees that no Industrial activities with potential to pollute stormwater runoff will be conducted outside the hangar. Will diligently manage operations to ensure all industrial activities are conducted inside the hangar.
Delbert Francis Coller III Dell Aero Speed (Tenant – No Exposure)	302-218-0752	
Tim Charles Flight Doctor West (Tenant – No Exposure)	208-455-9350	
Steven Tubbs Performance Air (Tenant – No Exposure)	208-455-7400	

City of Caldwell Engineering Department staff and Caldwell Industrial Airport staff are responsible for leading the development of the comprehensive stormwater pollution prevention at the Facility, and for coordinating with tenants and operator-tenants to ensure compliance with this SWPPP. Operator-tenants are responsible for adhering to the SWPPP, as it pertains to their site. For stormwater pollution prevention concerns expanding beyond the operator-tenants and tenants' sites, all tenants should contact the stormwater pollution prevention team.

1.5.1. MSGP Implementation Responsibilities

The MSGP allows the Airport Authority to implement some MSGP compliance activities on behalf of its tenants to increase efficiency. Based on this allowance, the following responsibilities are divided as follows:

The Airport will complete the following activities and document all in the SWPPP and appendices:

- File for coverage under the MSGP for Caldwell Industrial Airport operations;
- Maintain a comprehensive SWPPP to cover all Airport Authority, operator, and tenant activities;
- Conduct Quarterly Visual Assessment of outfalls
- Conduct and document Routine Facility Inspections for Facility, including outdoor areas, including areas of outdoor tenant activity – Post inspection results in Airport Manager's Office and Airport Manager in writing of issues needing correction (Airport Manager to follow up with tenant);
- Conduct and document maintenance activities at Airport operations in the comprehensive SWPPP;
- Prepare and submit Annual Report to EPA on behalf of entire Facility and provide a copy to all tenants when complete.

Operator-tenants required to register for MSGP coverage (NOI) are required to complete the following activities and to provide documentation to Airport Manager and City of Caldwell Engineering Department:

- Review and understand MSGP and SWPPP;
- Certify and follow SWPPP;
- File for coverage under MSGP for tenant operations;
- Provide all documentation of maintenance/testing of fuel tanks to Airport Manager each year
- Conduct and document maintenance activities including BMP maintenance (spill kits, drainage structures, etc.) at tenant operations and provide to Airport Manager each year. Train staff prior to their operating equipment. Keep record of training.
- Immediately notify the Airport Manager of any observed issues with BMPs, spills, leaks, or unauthorized discharges and work any designated City staff to resolve

Operator-tenants who file for No Exposure Certification (NOE) must provide all information relative to the filing to the Airport Authority and Owner. They must re-file for coverage with Idaho DEQ annually. These operator-tenants must still provide records of any BMPs/Control measures to the Airport, including maintenance and cleaning records, as well as material disposal records/contracts.

If at any time the Airport or City of Caldwell staff observe tenants performing industrial activity in a manner that is exposed to stormwater, the Airport Authority shall notify the tenant of their need to file for coverage under the MSGP and terminate their No Exposure exemption.

In order to file a NOI or No Exposure Certification Form, an IDEQ electronic IPDES E-Permitting account is needed. Registration for an IPDES E-Permitting account can be completed at the following site: https://www2.deq.idaho.gov/water/IPDES. Operator-tenants should be prepared to provide personal and business information. Using the IPDES E-Permitting account and requesting access to a Role as either an Administrator, Certifying Official, or Duly Authorized Representative will allow the user to file the appropriate documents. At a minimum, the Certifier (signer) for each Operator will need to set up and maintain an account. Here is an MSGP excerpt regarding which employees may sign and certify:

A. *NOIs, NOTs, and NOEs must be signed as follows:*

1. *For a corporation: By a responsible corporate officer. For the purpose of this subsection, a responsible corporate officer means: (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorize d to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.*

2. *For a partnership or sole proprietorship: By a general partner or the proprietor, respectively; or*

3. *For a municipality, state, federal, or other public agency: By either a principal executive officer or ranking elected official. For purposes of this subsection, a principal executive officer of a federal agency includes (i) the chief executive*

officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrator of EPA).

Your SWPPP, including changes to your SWPPP to document any corrective actions taken as require d by Part 3.1, and any other compliance documentation required under this permit, including the Annual Report, DMRs, inspection reports, and corrective action reports, must be signed by a person described in Appendix B, Subsection 11.A above or by a duly authorized representative of that person. A person is a duly authorize d representative onlyif:

The authorization is made in writing by a person described in Appendix B, Subsection 11.A;

The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and
The signed and dated written authorization is included in the SWPPP. A copy must be submitted to EPA, if requested.

All other changes to your SWPPP, and other compliance documentation required under Part 5.4, must be signed and dated by the person preparing the change or documentation.

B. *Changes to Authorization. If an authorization under Part 1.3.1.3 is no longer accurate because the industrial facility has been purchased by a different entity, a new NOI satisfying the requirements of Part 1.3 must be submitted to EPA. See Table 1-2 in Part 1.3.1.1 of the permit. However, if the only change that is occurring is a change in contact information or a change in the facility's address, the operator need only make a modification to the existing NOI submitted for authorization.*

C. *Any person signing documents in accordance with Appendix B,Subsections 11.A or 11.B above must include the following certification:*

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the

information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

D. *For persons signing documents electronically, in addition to meeting other applicable requirements in Appendix I, Subsection B.11, such signatures must be legally dependable with no less evidentiary value than their paper equivalent.*

E. *The CWA provides that any person who knowingly makes any falsestatement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.*

1.6 *Site Description*

The Caldwell Industrial Airport (FAA Designation: EUL / ICAO Airport Code: KEUL) is located in southwest Idaho within the City of Caldwell, approximately 3 miles southeast from the Caldwell City center. The Facility currently has one runway, RWY 12/30, which is 5500 feet long and 100 feet wide and is oriented northwest/southeast. The Facility site consists of four hundred and sixty (460) acres of land, of which three hundred and thirty (330) are classified as industrial activity areas exposed to stormwater.

The Facility is owned and managed by the City of Caldwell. Tenants may own and erect hangars, but must enter into a lease agreement for each parcel of land inside the Facility. Tenants are allowed to house small (single occupant to charter) airplanes in leased hangars. Standard lease agreements do not allow for maintenance or storage of materials outside of the hangars. Tenants are not allowed to store personal property outside the hangar, including materials associated with use and maintenance of the aircraft. Two privately operated stationary fueling sites are located within the Facility; one operator-tenant also operates a commercial refueling tanker vehicle. Some tenants also have refueling vehicles; these are operated commercially, and discussed in greater deal in later sections.

1.6.1. Receiving Waters

Caldwell Industrial Airport is divided into multiple drainage basins (stormwatersheds). Each operator-tenant may be located upstream of a different receiving facility.

- Cascade Aircraft Management LLC – Site discharges to infiltration gallery (groundwater)

- Dell Aero Speed – Store front: AP-06 (pond) to East Caldwell Drain to Indian Creek; Hangar apron: AP-05 (manhole) to East Caldwell Drain to Indian Creek
- Midfield Aviation, LLC – Site discharges to infiltration trench (groundwater)
- Performance Air, Inc. – Site discharges to AP-07 (manhole)
- Silverhawk Aviation Services, LLC - Site discharges to AP-07 (manhole)
- Flight Doctor West, LLC – AP-05 (manhole) to East Caldwell Drain to Indian Creek
- Vintage Airframes, LLC - Site discharges to vegetated strip, then AP-08 (vegetated swale)

All stormwater runoff that is not infiltrated, either through underground infiltration gallery or surface stormwater pond, and that is discharged from the site, has the potential to reach Indian Creek, in impaired surface water of the United States. Indian Creek is a tributary of the Boise River, another impaired surface water of the United States. The waterbody designation and associated impairments for the two waterbodies are shown in Table 2.

Table 2. Receiving Water Impairments

Waterbody/Assessment Unit/Description	Impairment Pollutants
Indian Creek ID17050114SW002_04 *Indian Creek – Sugar Ave to Boise River*	Temperature; E. coli; Sedimentation/ Siltation; Cause unknown, nutrients suspected
Boise River ID17050114SW005_06b *Boise River – Middleton to Indian Creek*	Temperature; Fecal Coliform; Sedimentation / Siltation; Total Phosphorus

1.6.2. Stormwater Drainage Systems

Considering the Airport as a whole, approximately half of the stormwater from outfalls is captured in stormwater settling ponds and/or infiltration galleries. Depending on the time of year and the groundwater elevation, the water can infiltrate into the ground or runoff to surface water, if high groundwater impedes infiltration. One fourth of the outfalls are direct pipe discharges to surface water. The City has the intent to construct a new, large, vegetated settling pond near the East Caldwell Drain to better contain and/or treat the direct discharge points (as groundwater allows). One fourth of the outfalls discharge to groundwater. (These are not discussed in depth in the Airport NOI.)

1.6.3. Activities at the Facility

Caldwell Industrial Airport provides hangar and tie down space for aviation. Individuals and businesses lease hangar and tie-down space to be used for personal or commercial activities. Private hangar tenants predominantly utilize the Facility to store and operate their aircraft(s); they may also purchase fuel from one of the commercial fueling operations at the

Facility at their discretion. Commercial tenants conduct a way array of business operations at the Facility:

- Aircraft fueling
- Flight training academy
- Aircraft rentals and flight charter services
- Aircraft maintenance
- Skydiving training and charter services
- Part supplier
- Custom aircraft restoration
- Airframe modification
- Restaurant/cafe

No chemical deicing of aircraft or the airfield is conducted currently at the Facility. During winter weather, the Airport Authority hires a contractor for manual snow removal (plowing) for clearing the taxiways and runway.

1.7 *General Location Map*

A general location map for the Facility is included as Figure 1. This map shows the Caldwell Industrial Airport property location within the City of Caldwell and relative to water resources.

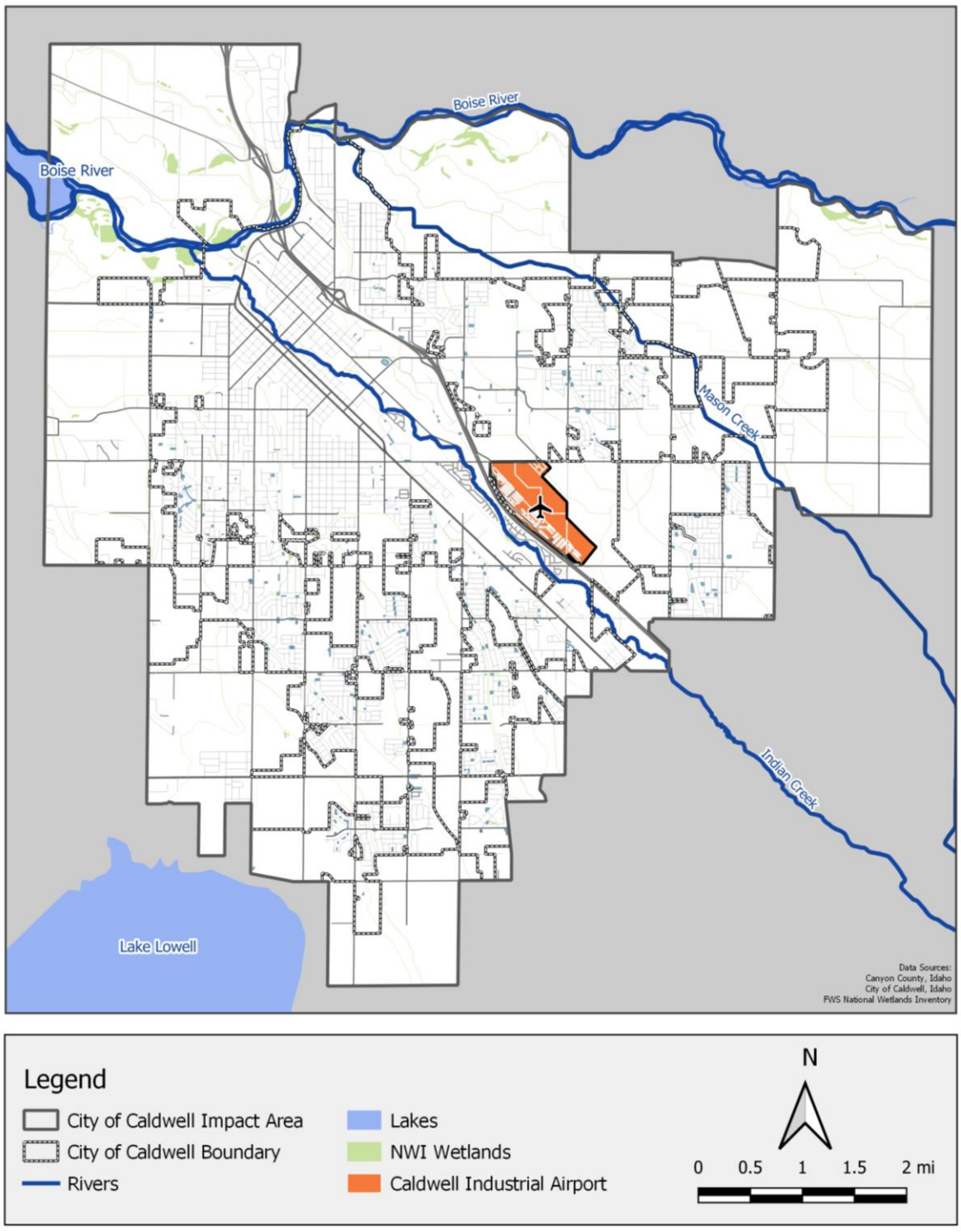

Figure 1. *Location of Caldwell Industrial Airport*

1.8 *Site Maps*

Site Maps for the Facility are included in Appendix A of the SWPPP. The following maps have been developed:

- Airport overview, including impervious surfaces and receiving surface waters
- Locations of industrial activities, including potential pollutant sources and previous documented spills or leaks
- Stormwater management, including infrastructure, flow paths, drainage areas

Additional maps were created in the development of the operator-tenant's contributing SWPPP documents. Each contributing SWPPP document contains site-specific maps for the specific operator-tenant, showing tenant location within the airport, stormwater infrastructure and flow paths from the site, and identified areas of potential pollutant sources. This maps can be found in the contributing SWPPP documents in Appendix B of this document.

Facility maps with labeled hangars are included in Appendix D along with additional tenant information for all Airport tenants. These maps can be cross-referenced with the table of tenant information included in the same appendix.

As required by the 2021 MSGP, the following information is included in the site maps, and will be updated as needed to reflect ongoing changes at the Facility:

- Boundaries of the property and the size of the property in acres;
- Location and extent of significant structures and impervious surfaces;
- Directions of stormwater flow (use arrows), including flows with a significant potential to cause soil erosion;
- Locations of all stormwater control measures;
- Locations of all receiving waters, including wetlands, in the immediate vicinity of your facility, indicating which waterbodies are listed as impaired and which are identified by your state, tribe or EPA as Tier 2, Tier 2.5, or Tier 3 waters;
- Locations of all stormwater conveyances including ditches, pipes, and swales;
- Locations of potential pollutant sources identified under Part 6.2.3;
- Locations where significant spills or leaks identified under Part 6.2.3.3 have occurred;
- Locations of all stormwater monitoring points;
- Locations of stormwater inlets and discharge points, with a unique identification code for each discharge point (e.g., 001, 002), indicating if you are treating one or more discharge points as "substantially identical" under Parts 3.2.4.5, 6.2.5.3, and 4.1.1, and an approximate outline of the areas draining to each discharge point;
- If applicable, MS4s and where your stormwater discharges to them;
- Areas of Endangered Species Act-designated critical habitat for endangered or threatened species, if applicable; and
- Locations of the following activities where such activities are exposed to precipitation:

- fueling stations;
- vehicle and equipment maintenance and/or cleaning areas (all maintenance and/or cleaning is conducted indoors);
- loading/unloading areas (not applicable);
- locations used for the treatment, storage, or disposal of wastes (dumpsters and trash receptacles only);
- liquid storage tanks;
- processing and storage areas;
- immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility (not applicable);
- transfer areas for substances in bulk (not applicable);
- machinery (not applicable); and
- locations and sources of run-on to your site from adjacent property that contains significant quantities of pollutants (not applicable).

Section 2. Potential Pollutant Sources

2.1 *Potential Pollutants Associated with Industrial Activity*

The following table summarizes industrial activities conducted by tenants of the Caldwell Industrial Airport, which are subject to the requirements of the MSGP. Information provided in this table is described in further detail in other sections of this document.

Table 3. *Pollutant sources associated with industrial activity*

Industrial Activity	Associated Pollutants
Aircraft washing (surficial *only*)	Detergents, solvents, sediment
Aircraft maintenance	Oil and petroleum products, batteries, paint, lacquer, paint stripper, solvents
Aircraft refueling	Fuel – Jet A and 100LL (AvGas)
Companion Pets with Pilots	Pet waste
Waste Disposal	Garbage and litter
Onsite Portable Toilet	Human waste
Disturbed silty land/Erosion	Sediment
Material storage	Fuel, oil, lubricants, sediment

2.2 *Industrial Activity Areas*

Industrial activity may occur at various locations, for each operator tenant. The descriptions in this section explore whether the activity is performed inside the hangar, protected from precipitation, or outdoors, exposed to precipitation.

Because it is feasible for many operator-tenants to pivot their activities to exclusively work indoors, some qualify for a No Exposure exclusion from permitting and may file a No Exposure Certification. Operator-tenants who commit to this option, shall formalize their agreement in writing to the Airport Authority and file for their NOE with Idaho DEQ. Individual tenant box hangar owners who maintain their own aircraft in private hangars for personal use and do not operate a business with an SIC code do not qualify as industrial operators under the MSGP.

2.2.1. Aircraft/Vehicle/Equipment Fueling

The Airport Authority does not sell aviation fuel at Caldwell Industrial Airport. Fuel is sold by two private parties – Midfield Aviation and Silverhawk Aviation. Both facilities provide self-serve options for Airport tenants (behind gated entry). Self-serve pumps are configured in a manner similar to an automobile fuel pump. Silverhawk Aviation also utilizes fuel tankers to refill their own aircrafts for aviation academy. Fueling with the mobile refueler is conducted only by trained employees of each company. In summary:

- Silverhawk Aviation – Fuel sales with stationary tank and private mobile refueling with tanker(s)
- Midfield Aviation – Fuel sales with stationary tank

All fuel tanks and fuel pumps are outdoors. Fuel pumps are covered with sunshades to protect them from the elements, but it is logistically infeasible and dangerous to physically cover refueling areas. Due to the nature of the vehicles—aircrafts—and FAA regulations, airport refueling sites cannot be covered with a physical barrier in the same manner as automobile refueling stations, as the physical barrier would impede the aircraft's access to the fueling station. Therefore, aircraft refueling is exposed to precipitation at the Airport. Because of this, all refuelers are required to have a fully-stocked spill kit on each of their tankers and at each stationary fueling site. At the stationary sites, the kit must be labeled, easy to recognize and access, and readily available to all pump users. After two written warnings, should the Airport Authority or Owner be forced to supply a refueler with a spill kit or replacement supplies, the refueler will be invoiced for the total cost, up to and including the materials purchase, expedited shipping, as well as employee wages and benefits.

During repair and maintenance activities, fuel may need to be removed from the aircraft being worked on and replaced after repairs are completed. If at all possible, fuel removal/replacement should take place inside a hangar. This activity would not be exposed

to stormwater, except for in the case of an excessive spill which leaked beyond the hangar. All operator-tenants commit to having a spill kit on hand fully restocked in the event of such accidents, and should follow the spill protocol specified in this document.

Any private-sized fuel containers held by other tenants or operator-tenants shall be stored inside their own hangar. In the instance that this is infeasible, the tank shall be covered from the elements, and shall also have secondary containment.

2.2.2. Material Storage/Delivery Area

Wherever feasible, all tenants shall store their belongings and materials inside their office or hangar, protected from precipitation. Materials used in repair and maintenance activities (oils, aircraft/vehicle fluids, lubricants, paints, thinners, strippers, etc.) are stored inside. Material storage inside a building has limited potential to be exposed to stormwater. To the greatest extent possible, aircrafts, ground vehicles, and equipment should be stored indoors. If it is temporarily infeasible to store such items inside the hangar, they should be covered and have secondary containment to minimize the chance of a leak.

In some cases, interior storage of materials is not possible due to tank size, as is the case with the fuel storage tanks. BMP's such as dual-walled tanks, barricades, bollards, site-specific grading, and spill kits shall be used to protect these locations.

Table below lists materials which have been observed being stored outside and are the most likely materials to contact stormwater at the Facility.

Table 4. *Observed potential stormwater pollutants, by tenant*

Entity	Material	Location	Spill Kits/ Secondary Containment/ Cover?	Recommended Action
Cascade Aircraft Management	Unknown Drum (found one time only)	Behind hangar	None	Store these items inside the hangar
Vintage Airframes	Drums containing parts	Adjacent to hangar; inside grassy, fenced area	None	Store these items inside the hangar or boxcar; dispose of any empty containers at the landfill
Vintage Airframes	Engine Bath (Simple Green)	Intermittently found on hangar apron	Covered, with secondary containment	None
Silverhawk Aviation	Stationary Fuel Pump	SE of Silverhawk Hangar	Barricades protecting a double-walled tank. Sunshade protecting the fuel	Keep spill kit well-visible and make it available to all refuelers at the self-serve fuel station.

			pump. Emergency shutoff is accessible and labeled properly.	
Silverhawk Aviation	Refueling Tankers	SE of Silverhawk Hangar	Spill kits are on tankers.	Keep spill kits onboard tankers. Inspect skill kit regularly.
Performance Air	Aircraft Machine Fluids	Drums and one shuttle found NW side of hangar.	Shuttle has secondary containment.	Store these items inside the hangar; if infeasible, provide secondary containment for all chemicals stored outside. Dispose of any empty containers at the landfill.
Flight Doctor West	Used Oil (shuttle container at past inspections)	Between hangars, with other belongings	None	Store these items inside the hangar. In addition, a spill kit is required for this facility due to visible staining outside the hangar.
Midfield Aviation	Stationary Fuel Pump	Along Taxiway, north of hangar	Barricades protecting a double-walled tank. Emergency shutoff is accessible and labeled properly. Spill kit is visible and available to all refuelers at the self-serve fuel station.	None.

2.2.3. Aircraft/Vehicle/Equipment Maintenance and Repairs

As much as possible, all aircraft and equipment maintenance shall be conducted indoors, sheltered from precipitation. The risk of pollutants to contact stormwater becomes quite low. However, if a large spill or leak were to occur during the maintenance or repair process and was not properly stopped, the pollutant could potentially leave the hangar area. Operator-tenants must be equipped with spill kits or similar spill-response materials which would allow them to contain and clean spills.

2.2.4. Aircraft/Vehicle/Equipment Cleaning

Operator-tenants and private pilots may conduct interior (cabin) cleaning and/or detailing on aircraft within the hangars or on the aprons. This activity is contained within the aircraft and will not contact stormwater, unlike exterior washing.

Aircraft, vehicle, equipment, and pavement wash-waters are not covered under the MSGP and require different permitting. Each tenant who conducts aircraft or vehicle washing at the Facility is subject to the requirements of all applicable local, state, and federal regulations regarding this activity and must secure their own permitting.

The Airport Authority is not liable for this activity and prohibits unpermitted aircraft, vehicle, etc. wash-waters from discharging to the onsite storm drainage network. Pilots and tenants who wish to wash aircraft need to coordinate this activity such that it is covered by a tenant's permit. Any washing of aircrafts, vehicles, equipment, pavements, etc. which is covered by a permit must use environmentally green, phosphate-free, biodegradable soaps and be properly permitted, with copies of all permits provided to the City of Caldwell Engineering Department and maintained with the comprehensive SWPPP and individual SWPPP contributions.

2.2.5. Aircraft Deicing

Aircraft or airfield deicing using chemical deicing agents is not currently conducted by the Airport or any of its tenants. Tenants who wish to begin to execute deicing activity shall request permission in writing 5 business days prior to anticipated use from the Airport Authority (Airport Manager) and Owner (City of Caldwell Engineering Department). The City must grant permission in writing prior to the use deicing agents being approved. The addition of such activity would likely result in revision of the City's and operator tenant's NOI's.

2.3 *Spills and Leaks*

This section is intended to address two concerns, under the MSGP: (1) Describe where potential spills and leaks could occur at their facilities that could contribute pollutants to stormwater discharge, and to specify which outfalls are likely to be affected by such spills; and (2) Describe significant spills and leaks of oil, toxic, or hazardous pollutants, that have occurred in the past 3 years at exposed areas or that drained to stormwater conveyances.

Potential spills and leaks, predominantly associated with aviation-related activities at the Facility, could contribute pollutants to stormwater from the Facility. Since most activities and materials are inside, areas where pollutants can contact precipitation are focused on the outdoor fueling areas and outdoor aprons adjacent to each hangar, where limited maintenance activities could occur.

Table 5. Areas where potential leaks / spills could occur

Location	Discharge Points
Silverhawk (Route 66) Refueling Area	AP-07
Midfield Aviation Refueling Area	Not Connected – Graded away from the storm drain network into grassed area for infiltration
Private Refueling Tank	All
Porta Potty(s)	All
Areas where Personal Material is Stored	AP-08
Dumpster	AP-07
Silverhawk Helicopter Parking & Training Area	AP-07
Hangars under construction	AP-06

Table 6. Description of past spills

Date	Description	Discharge Points
2/26/2018	Oil filter dumped at catch basin (illicit)	AP-03
10/17/2019	Hangar 5017 – used oil container leaking	AP-05
10/17/2019	Hangar 4411 – engine bath leaking Simple Green cleaner	AP-08
10/28/2019	Fuel spotting on concrete at Midfield Refueling Area	Not Connected

Standard Operating Procedure for Spills:

1. Control the Source - A drum, for example, which was knocked over, may still have some pollutant in it. The responder should carefully upright the container, place it on an absorbent pad in a safe location and replace the lid.

2. Control or Absorb Free Liquid - Any spread of spilled pollutant must be controlled. This is done by placing absorbent materials around and on the spill. The spill responder must be careful to avoid direct bodily contact with an unknown chemical.

    a. Acid, Caustic or non-flammable - These are most easily absorbed with the absorbent pads. Place used pads in a trash bag. Frequently, spills will spread into drawers and behind or under equipment. The responder must be careful to locate all contaminated areas.

    b. Flammable liquids - flammable liquids should be absorbed using the granular absorbent material (for example, kitty litter or floor dry). Use the dust brush to mix the adsorbent with the liquid. Use the dust pan and brush to collect all residue.

3. Place enough absorbent materials to fully consume the spill. Allow 24 hours to dry. Cover with plastic tarp, if needed.

4. Dispose of absorbent pads at landfill or haz mat disposal site (as needed). Sweep up granular absorbent and dispose of material at landfill or haz mat disposal site (as needed). If a power broom is used, ensure that entire contaminated load is taken to landfill. Clean off the broom as needed following use.

5. Inspect the area and take photos of the post-cleanup site. Document the spill event and cleanup activities (parties involved, material spilled, date/time/etc.) Carefully check the entire affected area for spill residue, hidden contamination or unsafe conditions.

6. Reorder and stock spill kit supplies.

2.4 *Unauthorized Non-Stormwater Discharges Documentation*

The following non-stormwater discharges are authorized under the MSGP provided that the discharges comply with the effluent limits in Parts 2 and 8 of the MSGP:

- Discharges from emergency unplanned firefighting activities;
- Fire hydrant flushing;
- Potable water, including water line flushing;
- Uncontaminated condensate from air conditioners, coolers, and other compressors and from storage of refrigerated gases or liquids;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with approved labeling;
- Pavement wash-waters where no detergents or hazardous cleaning products are used and the wash-waters do not come into contact with oil and grease deposits, sources of pollutants from industrial activities, or any other hazardous materials (unless all spilled material has been cleaned up using dry cleanup methods and removed) – Note that authorized pavement wash-waters may not be directed to any surface water or storm drain inlet unless they have been treated by control measures according to the requirements of Part 2.1.2 or treated by filtration, detention, or settlement;
- Routine external building wash-down that does not use detergents or hazardous cleaning products;
- Uncontaminated groundwater or spring water;
- Foundation or footing drains where flows are not contaminated with process materials; and

- Incidental blowdown mist from cooling towers but not intentional discharges via drains or piped blowdown.

The MSGP does not provide authorization for the discharge of aircraft, ground vehicle, runway, and equipment wash-waters or the dry weather discharge of deicing chemicals. These and similar discharges must be covered by a separate NPDES permit.

Caldwell Industrial Airport has been observed to have seasonally high groundwater elevations. At times, this causes AP-01, AP-04, AP-05, AP-06 and the East Caldwell Drain to discharge groundwater. In addition, areas downstream of AP-11 and AP-08 infrequently comingle with agricultural irrigation runoff. Tenants who observe scented or visibly polluted flow in the storm drain should photograph and report the incident to the Airport Manager within 24 hours.

2.5 *Salt Storage*

There are no salt storage facilities located at the Airport. During winter weather, snow is manually removed from runways, taxiways, aprons, and other facilities.

2.6 *Sampling Data Summary*

See Appendix H for laboratory reports during this permit term, beginning in 2021. Formal sampling activity at the Facility began in 2017 following completion of the Indian Creek TMDL. To obtain sampling data from the previous permit term (2015-2020), file a Public Record Request with the City Clerk, or contact the Engineering Department directly. Operator-tenants do not have authorization to access to the onsite storm drain infrastructure, and therefore are not responsible for conducting stormwater sampling. Stormwater sampling is conducted by the Airport Authority, City of Caldwell. All tenants should contact the Airport Manager for inquiries related to stormwater sampling.

Section 3. Stormwater Control Measures

The MSGP requires the use of stormwater control measures and best management practices at facilities. The following subsections describe controls in place and actions taken to limit the exposure of pollutants to stormwater at the Airport.

3.1 *Non-Numeric Technology-Based Effluent Limits*

3.1.1. Minimize Exposure

The first step of preventing pollutants from contacting stormwater is to minimize the materials stored and activities completed outside, exposed to the elements. In order to minimize exposure and limit pollutant potential – to the maximum extent practicable – material storage and industrial activities must be protected from precipitation and runoff. It is more cost effective to prevent pollutants from entering stormwater than to purchase and install engineered treatment devices at each outfall.

Some Airport activities (fueling and some storage of materials) have to be performed outside due to the nature of the activity or space restrictions. Checking and topping off fluids are also routinely done outside on the apron as a matter of common practice. Also, due to the transient nature of aircrafts and vehicles, it is necessary for some aircrafts, vehicles, and equipment to be intermittently parked outside of the hangar. Despite this, many of routine facility activities can be performed in a manner with is protective of stormwater.

The following best management practices (BMP's) are currently conducted at the Airport or shall be implemented as part of this SWPPP to the maximum extent possible, given the constraints of the facility:

- Materials and personal belongings should be stored inside, under cover and/or with secondary containment from precipitation. Actions which could cause pollution must be conducted inside to the maximum extent possible. These methods will minimize the potential for spills and leaks to grow beyond the opportunity to be easily contained or diverted prior to reaching surface water. Activities which must occur outside can be kept on pavements to maximize the chance that releases can be easily contained and/or diverted.

- Maintenance which includes draining fluid(s) or removing aircraft components containing fluid(s) shall be conducted inside and protected from precipitation.

- Aircraft, vehicles, and equipment with known leaks, or is awaiting repair, shall be kept indoors if space allows. Drip pans, granular absorbents, or spill pads shall be placed to catch leaks. If indoor space is not available, any such equipment must be monitored; any spillage must be cleaned up properly on a daily basis using drip pans, absorbents, and dry cleanup methods. Oil slicks with a visible sheen are indicative of insufficient cleaning/containment.

- Drain aircraft parts of mechanical fluids prior to disposal. Dispose of fluids and parts in an environmentally appropriate manner.

- Contain and clean up spills and leaks expediently using absorbent materials and/or a spill kit, as well as dry cleanup methods to achieve containment of potential pollutants. Report all releases and spills to the Airport Manager, or in their absence, their designee.

- Minimize the quantity of potentially pollutant-causing materials stored at the Airport site. The less materials which are held by each tenant, the less potential for their release to the environment. Materials which are no longer usable or useful should be disposed of properly, perhaps at the landfill or a household hazardous waste acceptance site. Tenants and operator-tenants should always ensure that tanks and containers are in good condition, with no sign of damage or leakage.

- Aircraft, vehicle, equipment, and pavement wash-waters are not covered under the MSGP and require different permitting. (This wash-water may not be discharged to the Caldwell Industrial Airport storm drain network.) Each tenant who conducts aircraft or vehicle washing at the Facility is subject to the requirements of all applicable local, state, and federal regulations regarding this activity and must secure their own permitting. The Airport Authority is not liable for this activity and prohibits unpermitted aircraft, vehicle, etc. wash-waters from discharging to the onsite storm drainage network. Pilots and tenants who wish to wash aircraft need to coordinate this activity such that it is covered by a tenant's permit. Any washing of aircrafts, vehicles, equipment, pavements, etc. which may become covered by a permit must use environmentally green phosphate free, biodegradable soaps and be properly permitted, with copies of all permits provided to the City of Caldwell Engineering Department and maintained with the comprehensive SWPPP and individual SWPPP contributions.

- For preflight checks, the practice of pouring sumped fuel into the air or onto paved and unpaved surfaces at the Airport is not allowed. Sumped fuel must be collected in a container for proper disposal, in accordance with all applicable regulations.

- Verify that all wash-water, with the exception of discharges from pavement wash water and detergent-free building wash-down, drains to sanitary sewer, in accordance with an approved permit from the Owner, City of Caldwell.

In addition to the abovementioned measures, the MSGP requires operators utilize even more means of reducing the exposure of potential pollutants to precipitation. Some of these methods include awnings, coverings, grading, berming, and/or curbing to divert runoff away from high-usage areas. Due to FAA safety regulations and design standards, some of these methods are infeasible to implement at airports, but will be incorporated where possible. Please consider the following best practices, given the site limitations:

- Pump sunshades are used at fuel sale locations (Silverhawk and Midfield Aviation), but covered awnings like those found at automobile fuel stations are considered a dangerous vertical obstruction for airplanes.
- Fuel sale locations are equipped with double wall tanks, protected with barriers and bollards, and equipped with readily accessible emergency shutoff stations.
- The fueling pad at Midfield Aviation is graded away from the storm drain network, and toward a contained infiltration trench.
- Tenants must implement secondary containment when their materials must be temporarily stored outside of the hangar.

3.1.2. Good Housekeeping

Good housekeeping measures are required under the MSGP. Exposed areas are kept clear of pollutants and that site maintenance practices be undertaken on a regular basis. The following good housekeeping measures shall be implemented Facility-wide as described in this SWPPP:

- Interior maintenance hangar areas shall be swept on a routine (at least bi-monthly) to prevent track-out of dust, sediment, or other material onto apron/ramp areas.

- Outside the hangar, on the apron, if tenants find objects or debris, they should be removed from the pavement via hand sweeping and/or pickup, removal and disposal. These routine pavement checks are instead used to identify areas where foreign objects or pollutants have reached paved areas. All surfaces shall be maintained in a clean condition to avoid dust generation. Unpaved areas shall be maintained with grass, gravel, riprap or other surface stabilization mechanism.

- Personal belongings and maintenance materials should be kept in an orderly manner, labeled properly and clearly, and stored in appropriate containers. Appropriate material storage is key to leak and spill prevention.

- Utilize existing materials before purchasing new ones.

- Maintain documentation, including MSDS forms, for all materials. Documentation shall be in accordance with all applicable local, state, and federal regulations. Disposal of oily rages, oil filters, air filters, batteries, spent coolant, and degreasers shall be compliant with RCRA regulations. Dumping is not allowed at the Airport.

- Operator-tenants at the Airport shall have a routine schedule for removal of waste materials from their activity areas. Those with garbage pick-up service shall keep dumpsters and other waste receptacles inside (as size allows) or covered at all times (for outside dumpsters), with drain plugs in the closed position. This may alternatively take the form of agreements with private companies for on-call pick up of hazardous wastes and waste materials, or an understanding with the Owner that

the tenant will remove their own wastes to be properly disposed of offsite at the tenant's expense.

- Tenants and operator-tenants shall inspect all tanks, drums, smaller containers, and material storage areas should be checked for signs of leaks or spills. Equipment, vehicles, and aircrafts should also be inspected for leaks. Absorbents should be placed below leaking items and immediate steps taken to address migration.

- Drain all fluids from parts prior to disposal of the part.

- Dry cleanup methods (sweeping) should be used for cleaning the apron or hangar floor.

- Never dispose of liquid wastes into floor drains, sinks, storm drain system inlets.

- Outdoor sanitary facilities should be properly maintained and inspected weekly. Anchoring and/or secondary containment is highly recommended. Do not place portable toilets next to catch basin inlets.

- Ensure that waste, garbage, and floatables do not escape to receiving waters; keep outdoor areas free of rubbish.

3.1.3. Maintenance of Equipment, Systems, and Control Measures

In order to document maintenance across the Facility, each operator tenant must maintain its own records of maintenance activity at his own site or hangar. The Airport Authority shall maintain records of maintenance performed on the Facility drainage infrastructure.

Due to the number of aircraft, equipment, systems, etc. located within the Airport campus, universally applicable items are listed below for maintenance. The Airport Authority, operator-tenants, and tenants must maintain all aircraft, equipment, and systems in accordance with manufacturer's instructions and/or industry best practices.

- Spill response supplies/equipment shall be checked at the same time each month. Reorder supplies as needed. Verify that all field staff are trained on how to execute stormwater protective measures found in this document.

- Any secondary containment and automated spill monitoring systems shall be sustained in accordance with manufacturer's instructions.

- Maintenance shall be performed in accordance with manufacturer's recommended schedule for all vehicles, aircraft, and equipment.

If a control measure needs to be renovated, repaired, or retrofitted, expedient action must be taken to minimize the potential of pollutant release until the measure is recommissioned.

Final repairs of the control should be completed as soon as possible, but must occur within 45 days, per the MSGP Corrective Action timeline.

If a problem is identified late in a work day for immediate action, all reasonable steps must be taken that day to prevent discharge of a pollutant until a more permanent solution can be achieved the next day. If necessary, call State of Idaho Haz Com for Emergency Spill Response. To report a Hazardous Materials/WMD or Explosives Incident, contact Caldwell Fire Department, or State Communications at 1-800-632-8000, or (208) 846-7610.

3.1.4. Spill Prevention and Response

The risk of leaks, spills, and other issues that may be unprotected from stormwater will be minimized (and by extension, effective spill response) at Caldwell Industrial Airport using the following control methods:

Preventative measures are summarized as follows for stationary fuel sales sites (Silverhawk Aviation and Midfield Aviation):

- Brightly painted Jersey barriers and bollards are located in front of the fuel storage tanks where aircraft would be parked to refuel and around all sides of the tanks for protection.
- Refuelers (fuel sellers) commit to provide access to "emergency off" switch and high-vis signage to any accessible switch.
- Refuelers (fuel sellers) commit to utilize storage tanks with secondary containment (or double-walled).

Preventative measures are summarized as follows for fuel tankers (Silverhawk Aviation):

- Fuel tankers equip each tanker with an onboard spill kit.

Other preventative measures which shall be implemented Airport-wide:

- Accurately label storage containers with the name of the current contents.
- Keep containers out of walkways, including inside buildings and hangars.
- Utilize any of the following: overfill alarms, leak detection, and visual gauges to prevent overfills.
- Procedures for spill prevention and response, as well as respective training for employees who participate in refueling activity. Maintain a training log which documents all employees who refuel aircrafts.
- During refueling, refuelers must stay with the aircraft at all times. If necessary, use dry cleanup methods to absorb drips and spills.

The contact list in Table 7 shall be provided to all tenants to post at their hangar, office, or activity site.

The person who discovers a spill fills an important role to determine immediate actions to ensure the safety of others and the environment. If the surroundings are unsafe, the

individual who discovers the spill should restrict access by others and should call for hazmat help as soon as possible. If conditions allow, he or she may also attempt to contain the spill, to prevent/minimize release to the environment.

If conditions are sufficiently safe, responders must make an earnest effort to contain spills at the source rather than resort to separation of the material from the environment or downstream waters. This can be accomplished by isolating sumps, drains, and building berms around potential environmental receptors using granular absorbents or absorbent booms. It is imperative that operator-tenants retain spill kits onsite and readily available.

***Table 7**. Spill response emergency contact list*

CALDWELL INDUSTRIAL AIRPORT SPILL RESPONSE EMERGENCY CONTACT LIST	
Caldwell Industrial Airport Contacts	
Primary Airport Operations Responder Rob Oates, Airport Manager	Office: 208-459-9779 24-hr: 208-880-2059
Primary Environmental Compliance Responder Emily Johnson, Environmental Engineer	Office: (208) 455-4687 24-hr: (208) 484-7243
Alternate Environmental Compliance Responder Ashley Newbry, Assistant City Engineer	Office: (208) 455-4672 24-hr: (208) 919-8327
Town/State Agencies	
Caldwell Fire Department	911 or (208) 455-3032 (office)
Caldwell Police Department	911 or Emergency: (208) 890-3397
Caldwell Street Department	Office: (208) 455-3072 24-hr: (208) 454-7531
Caldwell Wastewater Treatment Facility	(208) 455-3027 24-hr: (208) 949-1278
Canyon County Emergency Management	Office: (208) 454-7271 Cell: (208) 989-2132
State of Idaho Office of Emergency Management	(208) 258-6524
Federal Agencies	
National Response Center	(800) 424-8802
EPA Region 10 (Emergency Response)	1-800-424-4372 1-206-553-4973
Spill Response Contractors (Two nearby 24-hr contractors listed below)	
Olympus Technical Services, Inc; Boise, ID	(406) 443-3087 (24 hr line)
Master Environmental	(208) 490-8889 (24 hr line)

When reporting, the individual calling in the request for response should provide as much information about the release as possible. Where possible, the person making the call for hazmat response should attempt to provide the following:

- Spill location;
- Date and time discovered;
- Name of material spilled;
- Quantity spilled and source of spill;

- Associated hazards;
- Location and description of potential and actual environmental receptors;
- Actions being used to stop, remove, and/or mitigate the effects of the spill; and
- Description of any damages or injuries.

If notified first, the Caldwell Industrial Airport Manager will notify the appropriate tenant. Conversely, if the tenant is notified first, that individual will notify the Caldwell Industrial Airport Manager concurrently with initiating spill response efforts.

The Airport Manager or City Stormwater Compliance Responders will evaluate the situation to determine immediate actions required and the need for a spill response contractor to clean-up the spill, if necessary. If it is determined that that spill/release can be safely addressed by on-site resources, the Airport Manager or his designee may direct personnel to initiate appropriate clean up actions. For spills/releases which cannot be readily managed by on-site personnel, the Airport Manager or his designee may contact an appropriately qualified spill cleanup contractor to provide assistance. The Airport Authority retains the right to invoice or prosecute the owner of the improperly stored pollutant or otherwise guilty party for all legal, administrative, and directly remedial costs incurred, even in their absence.

3.1.5. Erosion and Sediment Controls

The topography of Caldwell Industrial Airport is relatively flat with sloped areas along watercourses and near swales. A great deal of the Facility is stabilized with asphalt, vegetation, or gravel. Some places still have bare land, and some locations are susceptible to erosion. The Airport soils are very silty. The City monitors these locations and is frequently looking for options to reconfigure and/or stabilize the bare-earth settling ponds and exposed areas. Much of the Airport runoff flows through settling pond type structures or infiltration galleries to allow sediment to settle out. City monitoring has found the ponds with vegetation to be effective in removing sediment, but they can also increase E.coli due to bird activity. If during routine inspections, evidence of scour or erosion/sedimentation is discovered, additional BMPs will be installed as needed.

Street sweeping of taxiways and the runway is conducted by the Caldwell Street Department on an as needed basis.

3.1.6. Management Runoff

Most paved runway and taxiway surfaces sheet flow to vegetated strips before draining to the Facility's piped drainage system, with some areas where flows are directed to vegetated swales before entering the piped system. Settling ponds and vegetated conveyances allow for uptake of pollutants as well as infiltration and reduce peak flows by filtering runoff.

About one half of the sampling locations are connected to stormwater settling ponds. Depending on the time of year, the water can infiltrate into the ground or discharge from the pond to surface water (when groundwater is high and soils beneath the facility have limited infiltration capacity). The other half of the sampling points are direct pipe discharges to surface water.

During winter conditions, snow is cleared from runways, taxiways, and roadways manually (i.e., snow plow), onto permeable surfaces, so that it may infiltrate into the ground as it melts.

3.1.7. Salt Storage Piles or Piles Containing Salt

No salt storage piles are currently maintained at the Facility, nor are any expected to be in the future. As such, controls for this item under the MSGP are not applicable to the Facility.

3.1.8. Dust Generation and Vehicle Tracking of Industrial Materials

A great deal of the Airport site is either paved or vegetated. Because of the types of activities which occur on the Facility, dust generating processes are minimal. The potential for an individual to track out industrial materials is also minimal. During winter, roadways and parking areas may have sand applied on a limited basis, but this is not a standard seasonal practice because it creates a need for post-snow street sweeping. Street sweeping shall be conducted by the Owner on an annual basis, or as needed, whichever term is shorter. The industrial activities at the Facility are not dust or particle generating processes. Airbrushing/painting shall occur indoors, with proper ventilation.

3.1.9. Non-Stormwater Discharges

Caldwell Industrial Airport and the Owner propose to minimize the potential for unauthorized non-stormwater discharges through continued illicit discharge detection and elimination (IDDE). This will be achieved through education of our Airport Management staff as well as more frequent facility inspections by the City sampling personnel. Routine Facility Inspections (quarterly, at minimum) performed by the sampling staff shall be submitted to the City Engineer, Public Works Director, and Airport Manager for review of the corrective action recommendations. As needed, the Airport Manager will interface with tenants to obtain compliance. New construction at the Airport will be reviewed during the design process to ensure that no unauthorized non-stormwater discharges are part of new projects.

3.2 *Sector-Specific Non-Numeric Effluent Limits*

8.S.3 Multiple Operators at Air Transportation Facilities. The Airport campus is owned by the City of Caldwell and site operations are managed by the Airport Authority. Each tenant holds a lease agreement with the City of Caldwell for use of a given site within the confines of a hangar or building structure. MSGP Appendix A defines “Operator” in the

following manner: Operator – any entity with a stormwater discharge associated with industrial activity that meets either of the following criteria: (1) The entity has operational control over industrial activities, including the ability to make modifications to those activities; or (2) the entity has day-to-day operational control of activities at a facility necessary to ensure compliance with the permit (e.g., the entity is authorized to direct workers at a facility to carry out activities required by the permit).

MSGP 8.S.3.1 states that where an airport transportation facility has multiple industrial operators that discharge stormwater, each individual operator must obtain coverage under an NPDES stormwater permit. A portion of the tenants at the Facility have been identified, through extensive investigation and collaboration with tenants, as "Operators" as defined by the MSGP. These operator-tenants, as they have been identified throughout this document are required to obtain coverage under the MSGP, and have worked with the City to develop this comprehensive SWPPP and the individual SWPPP contributions. See section 1.4 for a list of designated MSGP Operators at the Caldwell Industrial Airport.

8.S.4 Additional Technology-Based Effluent Limits.

8.S.4.1 Good Housekeeping Measures.

8.S.4.1.1 Aircraft, Ground Vehicle and Equipment Maintenance Areas. Caldwell Industrial Airport does not provide designated maintenance areas; tenants may perform light maintenance activity inside their hangar. Any waste produced must be stored inside the hangar or disposed of offsite.

8.S.4.1.2 Aircraft, Ground Vehicle and Equipment Cleaning Areas. (See also Part 8.S.4.6) Caldwell Industrial Airport does not provide designated cleaning areas; tenants may perform light cleaning activity inside their hangar. Any waste produced must be stored or disposed of offsite.

8.S.4.1.3 Aircraft, Ground Vehicle and Equipment Storage Areas. All aircraft, ground vehicles and equipment shall be parked in designated areas only—in most instances this location shall be entirely inside the lessee's hangar. Aircraft may be temporarily parked on the apron of the lessee's hangar.

8.S.4.1.4 Material Storage Areas. Materials containing contaminants such as petroleum products or chemicals must be stored indoors. A few hangars are outfitted with outdoor storage areas. Dirty mechanical parts and chemical storage may not be stored outside. Clean, dry, or sealed parts may be stored outside.

8.S.4.1.5 Airport Fuel System and Fueling Areas. The Airport Authority does not sell fuel on the airfield. Refuelers must minimize the discharge of pollutants in stormwater from airport fuel system and fueling areas through implementation of control measures

such as using only dry cleanup methods (onsite spill kits) and collecting stormwater runoff. See also Section 2.2.1.

8.S.4.1.6 Source Reduction. Deicer not utilized at this site. See also Section 2.2.5.

3.3 *Numeric Effluent Limitations Based on Effluent Limitations Guidelines*

Deicer is not offered or utilized by Caldwell Industrial Airport. No other numeric effluent limitations established in the MSGP are applicable to the Facility.

3.4 *Water Quality-Based Effluent Limitations and Water Quality Standards*

The storm drain system is operated and managed by the City of Caldwell. The potential for unauthorized non-stormwater discharges will be minimized through continued illicit discharge detection and elimination (IDDE). This will be achieved through education of our Airport Management staff as well as more frequent facility inspections by the City sampling staff. Facility inspection reports (quarterly, at minimum) performed by the sampling staff shall be submitted to the City Engineer, Public Works Director, and Airport Manager for review of the corrective action recommendations. As needed, the Airport Manager will interface with tenants to obtain compliance.

The City of Caldwell installed the following control measures into the stormwater drainage system of the Facility to improve water quality being discharged from the site to the receiving waters.

Pond AP-02. AP-02 is a stormwater detention pond located along Aviation Way. The pond receives stormwater runoff from two contributing catch basins and overflows into the East Caldwell Drain. The pond is stabilized with vegetation, and has cobble installed along the side of the pond adjacent to Aviation Way, to prevent erosion from roadway runoff. This BMP has sufficient capacity to rarely discharge, allowing sufficient time for sediment and other pollutants to settle out or be filtered out by the vegetation.

Pond AP-04. AP-04 is a stormwater retention pond located in the Airport Facility, designed to capture sediment runoff from the taxiway. The pond receives stormwater runoff from eleven contributing catch basins, as well as direct overland runoff from the adjacent taxiway. In addition to receiving stormwater runoff, the structure of AP-04 intersects an elevated groundwater table, and consistently contains standing water. As a result, the BMP contains extensive riparian vegetation and provides ample bird habitat. The prolific bird population is a likely culprit for elevated E.coli concentrations sampled from the outfall of this BMP, as stormwater samples collected at the inlet to the BMP show significantly lower E.coli concentrations. Due to the extensive vegetation and size of the BMP, it is effective at allowing

sediment to settle out before discharging to the East Caldwell Drain. City staff were advised to avoid stormwater collections that include groundwater intrusion during an Idaho DEQ inspection in October 2019.

Pond AP-06. AP-06 is a detention pond located between the East Caldwell Drain and the Notus Canal. The pond receives runoff from 28 contributing catch basins. One of the largest of the Airport's stormwater facilities, AP-06 has uniform vegetative cover and seasonal groundwater interference, particularly during the irrigation season. The pond has been observed discharging to the East Caldwell Drain during dry weather seasons. AP-06 also provides ample bird and waterfowl habitat, occasionally contributing to E.coli exceedances, but the pond has a large capacity and effectively reduces suspended sediment.

Borrow Ditch AP-08. AP-08 is a multi-part BMP, consisting of a vegetated swale and CMP culvert to a borrow ditch. The swale receives stormwater from seven contributing catch basins, as well as overland runoff from the surrounding taxiways. AP-08 tributary lines extend the full with of the Airport, from northeast to southwest. From the upstream portion, AP-08 receives agricultural runoff from the adjacent agricultural field. Active discharge from this site is infrequent, only once has the outfall been observed measurably discharging, during the event, stormwater did not make it through the entire borrow ditch to reach Indian Creek. The swale is well-vegetated, and the City is in the process of improving vegetative establishment in the contributing drainage area. The BMP is effective at allowing sediment to settle out of stormwater, and was cleaned out in the spring of 2021 to removed sediment that had settled out over the previous years of operation. The bottom of the swale also has cobble, to reduce erosion and increase settling functionality.

Pond AP-09. AP-09 is a relatively large and shallow (less than 2 feet deep) stormwater detention pond. The pond receives stormwater from nine contributing catch basins, as well as overland runoff from the adjacent taxiways. The bottom of the pond and the tributary borrow ditch are stabilized with cobble to reduce erosion and promote sediment settling. The City is in the process of improving vegetative establishment in the contributing drainage area. AP-09 discharges infrequently, but overflow from the pond discharges to Indian Creek.

Outfall AP-10. AP-10 is a relatively small and shallow stormwater detention pond. The pond receives stormwater from one contributing catch basin, as well as overland runoff from the adjacent taxiway. The bottom of the pond and the tributary borrow ditch are stabilized with cobble to reduce erosion and promote sediment settling. The City is in the process of improving vegetative establishment in the contributing drainage area. AP-10 discharges to the East Caldwell Drain.

Outfall AP-11. AP-11 is a large and deep infiltration pond that is fully stabilized with cobbles. AP-11 does not receive stormwater from any catch basins, but instead receives sheet flow runoff from the runway and surrounding agricultural fields. The pond has not been observed

discharging since its construction, however discharge from the pond would flow to Indian Creek.

AP-SB01 & -SB02. AP-SB01 and AP-SB02 are seepage beds / underground infiltration galleries. These BMPs receive stormwater runoff from paved surfaces and infiltrate the stormwater into the groundwater. The stormwater passes through sand and grease traps to remove additional pollutants before entering the facilities. AP-SB01 is the larger of the two facilities, receiving stormwater runoff from a large aircraft tie-down area, multiple hangars, and taxiways. AP-SB02 primarily receives runoff from the apron and taxiway leading to the northern-most hangar, currently leased by Cascade Aircraft Management. AP-SB01 has an overflow that is connected to Indian Creek, however the capacity of the structure is sufficiently large, compared to the contributing drainage area, that the structure has not discharged since its installation. AP-SB02 does not have an overflow, and is designed to exclusively infiltrate stormwater.

Section 4. Schedules and Procedures

4.1 *Good Housekeeping*

Waste, Garbage and Floatable Debris

Different kinds of wastes are managed at Caldwell Industrial Airport. This includes sanitary sewer and garbage, used oil slurry and spent aircraft fluids associated with recurring maintenance, as well as other various waste materials created from hangar and airfield maintenance. Some hangars on the Airport campus do not have water or sanitary services connected. Some hangars have portable toilets (port-o-potty) next to their buildings. These systems shall be maintained by the renter (tenant) or their maintenance contractor.

General trash/rubbish is collected on an individual basis, for each private hangar or building across the site, and it is typically removed from the site by each tenant. (Pack it in; pack it out.) In some instances, tenants have dumpsters onsite with their own private removal service. The Airport Authority and Owner generally do not generate waste beyond office-type activity at the terminal building. This site is also equipped with garbage pick-up of standard residential/commercial bins. Runways or taxiways are not typically sanded or salted, therefore, sweeping is not frequently necessary.

The following waste management BMPs shall be enacted by all tenants, especially operator-tenants:

- Whenever feasible, solid waste and garbage shall be kept indoors or sheltered from exposure until the day of their pickup. This method is impractical for dumpsters and does not apply.

- Dumpster and garbage cans shall be equipped with closed lids at all times, to minimize contact with precipitation and to limit their leak potential. Drain plugs shall be installed in large dumpsters.
- All dust and waste debris shall be swept and contained or otherwise cleaned up at the end of each onsite use by a tenant (hangar, apron, and/or area of activity). For those tenants who do not have garbage removal service, they are required to remove their own waste. Tenants should not allow unnecessary quantities of waste materials to accrue in their hangars. The Airport Authority does not condone unauthorized use of private dumpsters, or dumping material on the ground adjacent to dumpsters.

4.2 *Maintenance*

Maintenance and corrective actions of stormwater controls are performed promptly, following identification of concern or maintenance requirement through regular inspection schedule.

As much as possible, all aircraft and equipment maintenance shall be conducted indoors, sheltered from precipitation. The risk of pollutants to contact stormwater becomes quite low. If a large spill or leak were to occur during the maintenance or repair process and was not properly stopped, the pollutant could potentially leave the hangar area. However, operator-tenants must be equipped with spill kits or similar spill-response materials which would allow them to contain and clean spills

4.3 *Erosion and Sediment Controls*

Specific to this section, polymers and chemicals not used for ESC at the Airport.

On a related note, ESC BMP's are in place at the airport, in order to minimize the introduction of sediment into runoff. Different outfalls are equipped with different methods of sediment capture, such as a sedimentation basin or a sand-and-grease trap. Vegetated sedimentation ponds are installed ahead of the AP-02, AP-04, AP-06, AP-09, AP-10, and AP-11 outfalls, in order to capture sediment in runoff. Two of these ponds (AP-04 and AP-06) intercept groundwater, and are equipped with an emergency overflow and a sub-grade orifice to allow a continuous flow of groundwater. Surface water can be captured and naturally filtered, such that sediment is trapped in the pond and water can exit with groundwater flow. The AP-SB01 and AP-SB02 systems are equipped with upstream infiltration beds and sand-and-grease traps to minimize the pass-through of pollutants. Another BMP commonly utilized at the Airport is the stabilization of soils by adding gravel, cobble, or rip-rap to shallow swales, borrow ditches, and overflows.

4.4 *Employee Training*

The Stormwater Program staff are responsible for overseeing and managing stormwater management and pollution prevention for Caldwell Industrial Airport as a whole. Stormwater Program staff are responsible for the design, installation, maintenance and/or repair of stormwater controls and pollution prevention measures. They prepare, maintain, and update the SWPPP, spill response procedures, good housekeeping and maintenance requirements, and all corresponding documentation necessary to maintain compliance with the MSGP. They are responsible for conducting and documenting monitoring and inspections. They are also responsible for overseeing the staff responsible for the storage and handling of chemicals and materials that could become contaminants in stormwater discharge.

Each year, the Airport Manager attends the annual stormwater training session provided by the Engineering Department/Stormwater Program. The Engineering Department employees also participate in the same training. Such training is typically focused on clean water practices, such as:

- Picking up litter and pet waste,
- Illicit Discharge Detection and Elimination (both how to recognize and how to respond),
- Onsite housekeeping,
- Construction site management (i.e., erosion and sediment control),
- Leak prevention and cleanup procedure,
- Present and changing regulations in the stormwater sector, and
- All controls on the site required by this permit, and how they are to be maintained.

Stormwater program staff are licensed engineers and/or qualified environmental professionals. The trainings are overseen by the Assistant City Engineer in charge of the Stormwater Program. Modifications and maintenance of the stormwater system infrastructure are overseen by the City Engineer and/or Public Works Director. Any operator or tenant may request an onsite, personalized training session from the City of Caldwell's Stormwater Program.

4.5 *Inspections and Assessments*

Inspections and Assessments of the Facility will be predominantly conducted by the City Engineering Stormwater Team, namely the Assistant City Engineer, the Environmental Engineer, and/or the Engineering Technician. All individuals conducting inspections and assessments for the Facility are appropriately trained, and will receiving additional training annually, or more frequently if needed. Inspection and assessment documentation will be conducted using the forms and templates developed by EPA, and documentation will be filed

electronically. Any party that wishes to obtain a copy of inspection documentation can file a Public Records Request with the City Clerk or contact the Engineering Department directly.

Tenants and operator-tenants are required to leave their hangars, apron, and activity areas free of waste, dust, debris at the end of each use period, but are not required to conduct Facility-wide inspections or assessments. Any belongings left outside of the hangar should be protected from precipitation if they have the potential to release pollutants.

Inspection processes may include the following: Sampling events during a storm (including laboratory results); Quarterly Visual Assessments performed in conjunction with sampling events; Routine (Quarterly) Facility Inspections, which include IDDE inspections and potential for runoff contamination, as well as the functional condition of existing BMP's; or an IDDE-only inspection based on a tip, complaint, or staff observation.

4.5.1. Routine Facility Inspections

Each quarterly Routine Facility inspection shall investigate every outfall and the hangar areas tributary to the outfall. The inspection report shall summarize the current condition of each outfall and its BMP, photographs of the outfall and BMP, recommendations on how to improve the condition of the outfall and BMP site. The inspection report shall also cover a visual investigation of the tenant hangar and refueling areas inside the fenced airport campus. It will note any damaged or improperly managed facilities. The report will note any tenant violations observed and recommendations for remediation. This report will be distributed to the Airport Manager and all tenants identified in the inspection as requiring corrective actions. The report is also copied to the City Engineer and the Public Works Director, and a copy of the inspection reports will be included in Appendix E of this document.

4.5.2. Quarterly Visual Assessment of Stormwater Discharge

Stormwater Program staff utilize the Visual Assessment Form provided by the MSGP template package. Staff fill out the form and follow the inspection-of-sample procedure from top to bottom. The form includes fillable fields about the timing and intensity of the storm, the quantity of the discharge, and the quality of the sample collected (color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and any other indicators of pollution). It includes space for additional comments and encourages the attachment of photos. It is standard practice to collect photos with all QVA's conducted. A copy of the Quarterly Visual Assessment reports will be included in Appendix F of this document.

4.5.3. Exception to Routine Facility Inspections and Quarterly Visual Assessments for Inactive and Unstaffed Sites

This site is active and staffed, and does not qualify for the exception for inactive and unstaffed sites.

4.6 *Monitoring*

Check the following monitoring activities applicable to your facility:

☒Quarterly benchmark monitoring

☐Effluent limitations guidelines monitoring

☐State- or tribal-specific monitoring

☒Impaired waters monitoring

☐Other monitoring required by EPA

For each type of monitoring checked above, your SWPPP must include the following information:

Quarterly Benchmark Monitoring

1. **Sample location(s).** Samples may be collected from: AP-11, 10, 09, 08, 07, 06, 05, 04, 02
2. **Pollutants to be sampled**. TSS, Phosphorus, E.Coli
3. **Monitoring Schedules.** Quarterly, as required in DMR system.
4. **Numeric Limitations**. TSS: 20 mg/L; Phosphorus: 19 mg/L; E.Coli: 126 MPN/100 mL
5. **Procedures**. Samples collected within 30 minutes of the start of discharge, or as soon as possible, but still within 2 hours. Sample type is grab, gloves are always to be worn while collecting samples – never touch the bottle or cap threads directly. Samples are transported on ice to Analytical Laboratories in Boise.

Impaired waters monitoring

1. **Sample location(s).** Samples may be collected from: AP-11, 10, 09, 08, 07, 06, 05, 04, 02
1. **Pollutants to be sampled**. Temperature, TSS, Phosphorus, E.Coli
2. **Monitoring Schedules.** Quarterly, as required in DMR system.
3. **Numeric Limitations**. Temperature: 4 Deg C; TSS: 19 mg/L; Phosphorus: 19 mg/L; E.Coli: 30 MPN/100 mL
4. **Procedures**. Samples collected within 30 minutes of the start of discharge, or as soon as possible, but still within 2 hours. Sample type is grab. Samples are transported on ice to Analytical Laboratories in Boise.

Inactive and unstaffed sites exception

Not applicable for Caldwell Industrial Airport, since site is active

Substantially identical discharge point (outfall) exception

- Location of each of the substantially identical discharge points:

  Group 1: Discharge to pond with overflow to surface water: AP-02, 04, 06, 08, 09, 10, 11

  Group 2: Direct discharge (overland and pipe) to surface water: AP-01, 03, 05, 07

  Group 3: Discharge to Groundwater: AP-SB01, SB02 (not sampled/no discharge)

- List the general industrial activities conducted in the drainage area of each discharge point:

  Industrial activity is similar and consistent throughout the site. Refueling activity surface areas discharge to AP-07.

- List the control measures implemented in the drainage area of each discharge point:

  AP-01 – Direct Discharge
  AP-02 – Settling/infiltration Pond
  AP-03 – Direct Discharge
  AP-04 – Settling/retention Pond
  AP-05 – Direct Discharge
  AP-06 – Settling Pond
  AP-07 – Direct Discharge
  AP-08 – Vegetated Swale
  AP-09 – Detention Pond
  AP-10 – Detention Pond
  AP-11 – Infiltration/detention Pond
  AP-SB01 – Infiltration Gallery (no discharge to surface water)
  AP-SB-02 – Infiltration Gallery (no discharge to surface water)

- List the exposed materials located in the drainage area of each discharge point that are likely to be significant contributors of pollutants to stormwater discharges:

  Refueling activity surface areas discharge to AP-07. AP-08 and AP-05 have the potential to be exposed to agricultural runoff (high in sediment and nutrients) during irrigation season; they are connected to field runoff via pipe. AP-07 is exposed to a gravel-covered parking area utilized by Silverhawk Aviation, which could elevate TSS. AP-04 is exposed to soils which exhibit a great deal of erosivity, which have the potential to elevate TSS, but sediment is typically captured by the vegetated pond itself. In addition, AP-06 and AP-04 are vegetated ponds which intercept groundwater. This increases the bird activity at these sites, which in turn, has high potential to increase E.coli of the effluent.

- An estimate of the runoff coefficient of the drainage areas (low=under 40%; medium=40 to 65%; high =above 65%): Note: drainage area runoff coefficient may not directly correlate to quantity of runoff due to BMP's installed.

  AP-11: Medium; AP-10: Medium; AP-09: Medium; AP-08: Low; AP-07: High; AP-06: Medium; AP-05: Medium; AP-04: High; AP-03: Low; AP-02: Medium; AP-01: Medium

- Why the discharge points are expected to discharge substantially identical effluents:

  Similar BMP's are in place ahead of discharge at each substantially identical discharge point.

Section 5. Documentation to Support Eligibility Considerations Under Other Federal Laws

5.1 *Documentation Regarding Endangered Species*

See Appendix I for documentation regarding the Endangered Species Act (ESA).

5.2 *Documentation Regarding Historic Properties*

Not applicable.

Section 6. Corrective Actions

Explicit conditions trigger the need for Corrective Actions under the MSGP. Typically, formal corrective actions will be executed by the Owner or Airport Authority. When there is a modification to the design, operation, or maintenance of the Facility which substantially changes the nature of pollutants discharged, the SWPPP documents and BMP control measures must be examined to determine whether further alterations are necessary to meet MSGP requirements.

If any of the following occur, the SWPPP must be re-examined to ensure that the issue will not reoccur:

- An unauthorized release or discharge to a Water of the U.S.
- A discharge violates a numeric effluent limit (not applicable to the Facility)
- The Owner or Airport Authority become aware or EPA notifies the Facility that control measures are not stringent enough to meet water quality standards or non-numeric effluent limits of the permit
- A necessary BMP control measure was never installed or installed incorrectly or is not being properly assigned or maintained
- Visual assessments are indicative of stormwater pollution
- An assessment of the Airport by an EPA official, or state entity determines that modifications to control measures are necessary to meet non-numeric effluent limits from this permit
- The Owner or Airport Authority learn from Routine Facility Inspections or Quarterly Visual Assessments that BMP control measures are not being properly operated

6.1 *Immediate Actions*

Upon learning of a new incident, the Airport Authority or operator tenant must urgently take all steps necessary to minimize or prevent discharge of pollutants until a permanent solution is installed and made operative, including the cleanup of any contaminated materials.

6.2 *Subsequent Actions*

If further action is needed beyond the immediate action undertaken in the previous section, then a new or modified control must be installed and made operational prior to the next storm event, if at all possible, and within 14 calendar days from the date of discovery.

If this is infeasible, the Airport Authority or Owner must document why and attach the record to the SWPPP with a schedule for completing the work, which must be completed as soon as possible but no later than 45 days after discovery. If more than 45 days is needed, refer to the MSGP for requirements. If necessary, the SWPPP should be revised to include any modified BMP control measures.

6.3 *Corrective Action Documentation*

If any abovementioned conditions occur, the Facility shall document the discovery of these conditions within 24 hours of the discovery.

Within 24 hours of discovery, or as soon as feasible, of a condition listed above the following must be documented:

- Identification of the condition triggering the need for review (for spills/leaks include description of incident, material, date/time, amount, location, and reason for spill and if resulted in discharge of pollutants to waters of U.S.);
- Description of the problem;
- Date the problem was identified;
- Description of whether triggering condition requires corrective action. For spills or leaks, document response actions, date/time cleanup completed, notifications made, and staff involved (see spill documentation requirements form) and measures taken to prevent reoccurrence, and
- A statement, signed and certified in accordance with permit requirements.

Within 14 days, the following must be documented:

- Summary of corrective action taken or to be taken
- Note as to whether SWPPP modifications are required
- Date corrective action initiated
- Date corrective action completed or expected to be completed

The MSGP Corrective Action form must be prepared in accordance with the timeline above and maintained with the SWPPP and submitted as part of the Annual Report to EPA. If the Corrective Action is not complete at the time of the Annual Report submittal, the status of any Corrective Actions must be described on the appropriate form. The Corrective Action Log, as well as a Maintenance Log, are included in Appendix G.

SWPPP Certification

I, the undersigned, certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Robb MacDonald

Title: City Engineer

Signature: Robb MacDonald Digitally signed by Robb MacDonald Date: 2021.08.30 16:57:23 -06'00'

Date: 8/30/21

SWPPP Appendices

The following documentation is attached to this SWPPP:

Appendix A – Site Maps

Appendix B – Operator Tenant Contributing SWPPP Documents

Appendix C – Notice of Intent

Appendix D – Tenant Information

Appendix E – Routine Inspection Forms

Appendix F – Quarterly Inspection Forms

Appendix G – Corrective Action Documentation Forms

Appendix H – Laboratory Reports

Appendix I – Documentation Regarding Endangered Species Act (ESA)

Appendix J – 2021 MSGP