

Stormwater Pollution Prevention Plan Contribution  
Caldwell Industrial Airport



Prepared for Operators at:  
Caldwell Industrial Airport  
4184 Linden Street  
Caldwell, ID 83605

Cascade Aircraft Management

Created: May 2021  
Revision: August 2021

## Table of Contents

---

<b>Table of Contents</b> .....	<b>2</b>
<b>1 FACILITY DESCRIPTION AND CONTACT INFORMATION</b> .....	<b>4</b>
1.1 Introduction.....	4
1.2 Facility Information.....	5
1.3 Contact Information/Responsible Parties .....	6
1.4 Stormwater Pollution Prevention Contact(s).....	7
1.4.1 MSGP Implementation Responsibilities.....	8
1.5 General Location Maps.....	11
1.6 Site Map .....	13
1.7 Receiving Waters .....	14
1.8 Stormwater Drainage Systems .....	14
1.9 Activities at the Airport.....	14
<b>2 POTENTIAL POLLUTANT SOURCES</b> .....	<b>15</b>
2.1 Industrial Activity and Associated Pollutants.....	15
2.2 Industrial Activity Areas .....	15
2.2.1 Aircraft/Vehicle/Equipment Fueling .....	15
2.2.2 Material Storage/Delivery Areas.....	16
2.2.3 Aircraft/Vehicle/Equipment Maintenance and Repairs .....	17
2.2.4 Aircraft/Vehicle/Equipment Cleaning.....	18
2.2.5 Aircraft Deicing .....	18
2.3 Spills and Leaks .....	18
2.4 Standard Operating Procedure for Spills.....	18
2.5 Non-Stormwater Discharges .....	19
2.6 Salt Storage .....	20
2.7 Sampling Data Summary .....	20
<b>3 STORMWATER CONTROL MEASURES</b> .....	<b>20</b>
3.1 Minimize Exposure .....	20
3.2 Good Housekeeping .....	21
3.3 Maintenance of Equipment, Systems, Control Measures .....	23
3.4 Spill Prevention and Response .....	23
3.5 Erosion and Sediment Controls .....	25
3.6 Management of Runoff .....	25
3.7 Salt Storage Piles or Piles Containing Salt .....	26
3.8 MSGP Sector-Specific Non-Numeric Effluent Limits.....	26
3.9 Employee Training.....	26
3.10 Non-Stormwater Discharges.....	27
3.11 Waste, Garbage and Floatable Debris .....	27
3.12 Dust Generation and Vehicle Tracking of Industrial Materials.....	28
3.13 Applicable Effluent Limitations Guidelines.....	28
<b>4 COMPLIANCE PROCEDURES</b> .....	<b>29</b>
4.1 INSPECTIONS, MONITORING (SAMPLING), REPORTING .....	29
4.2 Routine Facility Inspections.....	29
4.3 Quarterly Visual Assessments of Stormwater Discharge .....	30

4.4	Monitoring/Sampling .....	30
<b>5</b>	<b>CORRECTIVE ACTIONS .....</b>	<b>32</b>
5.1	Immediate Actions .....	32
5.2	Subsequent Actions .....	32
5.3	Corrective Action Documentation.....	32
<b>6</b>	<b>SWPPP MODIFICATIONS/AMENDMENTS .....</b>	<b>33</b>
<b>7</b>	<b>SWPPP CERTIFICATION .....</b>	<b>34</b>
<b>8</b>	<b>SWPPP Forms .....</b>	<b>35</b>

# 1 FACILITY DESCRIPTION AND CONTACT INFORMATION

## 1.1 Introduction

This Stormwater Pollution Prevention Plan (SWPPP) has been prepared for Cascade Aircraft Management, an operator located at Caldwell Industrial Airport (Airport Authority), which is owned and operated by the City of Caldwell (Owner). The Caldwell Industrial Airport is composed of tenants who have lease agreements with the Airport Authority to conduct operations onsite (tenants and tenant operations).

The SWPPP has been prepared in coordination with the Airport Authority, Owner, tenants and *operators* designated according to the Multi Sector General Permit definition. Caldwell Industrial Airport seeks coverage under EPA's Multi Sector General Permit program (MSGP), for industrial sites who wish to discharge stormwater to surface Waters of the United States.

Based on their own activities conducted onsite, some tenants qualify as *operators* and need their own coverage under the MSGP or a No-Exposure exemption from coverage. All operators must seek MSGP permit coverage using the IDEQ's electronic IPDES E-Permitting to file the Notice of Intent (NOI) as required by the permit.

The Owner City of Caldwell has developed this document with the intent that it will act as an operator-specific addendum to the full-length SWPPP held by the Airport Authority. The Airport Authority is responsible for implementation of the site-wide SWPPP as it relates to Airport operation. Individual tenants and operator-tenants are responsible for implementation of the full-length SWPPP as it pertains to that tenant activity. Operator-tenants (operators) may choose to develop their own SWPPP to cover their own operations. However, in such cases, the tenant operator SWPPP must be reviewed and accepted by the Airport Authority, Owner, and/or either of their designated representatives. Operators and tenants must provide advance notification of procedural changes in their activities that may warrant revisions or updates to the either the site-wide SWPPP or an operator SWPPP.

The purpose of this SWPPP is to minimize the potential for polluted stormwater to leave the Caldwell Industrial Airport site, and into surface waters. The SWPPP is intended to identify potential pollutant sources from individual operators that could negatively impact the quality of precipitation runoff and to document existing and future measures designed to control pollutants in stormwater discharge.

In order to maintain coverage under the MSGP, each Operator must participate in:

- Implementing, and maintaining their SWPPP
- Filing an e-NOI or No Exposure Form (NOE) with the IDEQ
- Conducting required inspections, sampling, and monitoring
- Conducting Corrective Actions as triggered by City or internal inspections
- Amending the SWPPP when needed; providing notice to the Airport Authority

The SWPPP must be signed and certified by an authorized person in accordance with MSGP Appendix B Subsection 11, and **must be retained onsite - at the hangar or office at all times**. The SWPPP must be immediately available to the Owner and Airport Authority, U.S. EPA, and/or Idaho Department of Environmental Quality. In addition, the Airport Authority shall make its own SWPPP as well as each Operator's SWPPP available to the public.

## 1.2 Facility Information

Caldwell Industrial Airport terminal is located at 4184 Linden Street, in Caldwell, Idaho, but the main access to most hangar sites is via Aviation Way, between Linden and Ustick roadways. The entire site is approximately 330 acres and is drained by storm drainage infrastructure which ultimately discharges to Indian Creek or groundwater.

**Table 1. Facility Information.**

Name of Facility: Caldwell Industrial Airport	
Street: 4184 Linden Street	
City: Caldwell	State: Idaho ZIP Code: 83605
County or Similar Subdivision: Canyon County	
Permit Tracking Number for MSGP 2015: IDR050007	
Latitude:	Longitude:
43.647954 ° N (decimal degrees)	116.838187 ° W (decimal degrees)
Estimated area of industrial activity at site exposed to stormwater: <u>330</u> acres	

Name of Facility: Cascade Aircraft Management	
Street: 3901 Aviation Way	
City: Caldwell	State: Idaho ZIP Code: 83605
County or Similar Subdivision: Canyon County	
Permit Tracking Number for MSGP 2021: To Be Determined	
Latitude:	Longitude:
43.384952 ° N (decimal degrees)	116.384876 ° W (decimal degrees)
Estimated area of industrial activity at site exposed to stormwater: 0.8 acres	

**Table 2. Discharge Information.**

Does this site discharge stormwater into an MS4? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, name of MS4 operator: NOT APPLICABLE
Name(s) of water(s) that receive stormwater from your site: groundwater
Are any of your industrial discharges directly into any segment of an "impaired" water? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, identify name of the impaired water (and segment, if applicable): _____
Identify the pollutant(s) causing the impairment: _____
For pollutants identified, which do you have reason to believe will be present in your discharge? _____
For pollutants identified, which have a completed TMDL? If yes, list TMDL pollutants _____
Do you discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5, or Tier 3 water? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Are any of your stormwater discharges subject to effluent guidelines? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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
Primary SIC Code or 2-letter Activity Code: <u>4581</u>

Identify your applicable sector and subsector: Sector S – Air Transportation Facilities

The information contained in this section pertains specifically to the Cascade Aircraft Management site, not Caldwell Industrial Airport as a whole.

### 1.3 Contact Information/Responsible Parties

Caldwell Industrial Airport is owned and operated by the City of Caldwell. The Airport Authority contacts on behalf of the Owner are listed at the end of this section.

Each tenant and operator shall be responsible for its own environmental compliance measures, depending on activity. This document does not relieve any tenant from legal requirements they have for environmental compliance associated with their own activity. Under the MSGP, *operators* are defined as those parties who regularly conduct industrial activities at the Airport (vehicle or aircraft maintenance, cleaning, painting, fueling, deicing).

Pilots who work on their own planes for personal use and do not offer maintenance business would not qualify as industrial operators. Operators include those businesses who regularly perform industrial activities (fueling, maintenance, cleaning, painting, lubrication, repairs, deicing) at the Airport. If any operator does not conduct activities in a manner which is exposed to precipitation, it may file a No Exposure Certification under the MSGP. All Notice of Intent forms and permit correspondence for operator-tenants shall be provided to the Airport Authority (Airport Manager AND Caldwell Engineering Department).

**Table 3. Operator Tenant Main Contact Information**

<b>Tenant Operator Contact (Manager):</b>
Name: Lee Brinley, General Manager
Emergency Contact Telephone number: 630-688-7420
Email address: lab@leebrinley.com
Office number: 208-649-5106
<b>Tenant Operator Contact (Owner):</b>
Name: Bob Wolstenholme
Emergency Contact Telephone number: 267-218-0099
Email address: bwolstenholme@wmindustriesinc.com
Office number: 208-649-5106

**Airport Authority Contact Information**

Facility Operator(s):  
 Name: Rob Oates, Airport Manager for City of Caldwell  
 Address: 4814 E. Linden St  
 City, State, Zip Code: Caldwell, ID 83605  
 Telephone Number: 208-459-9779  
 Email address: roates@cityofcaldwell.org

Facility Owner(s):

Name: City of Caldwell  
 Address: 411 Blaine Street (City Hall)  
 City, State, Zip Code: Caldwell, ID 83605  
 Telephone Number: 208-455-3000

SWPPP Contact(s):

SWPPP Contact Name (Primary): Emily Johnson, Environmental Engineer  
 Telephone number: 208-455-4687  
 Mobile Telephone number: 208-484-7243  
 Email address: ejohnson@cityofcaldwell.org

SWPPP Contact Name (Backup): Ashley Newbry, Asst. City Engineer

Telephone number: 208-455-4672  
 Mobile Telephone number: 208-919-8327  
 Email address: anewbry@cityofcaldwell.org

Engineering Department

621 Cleveland Blvd  
 Caldwell, ID 83605  
 Telephone number: 208-455-3006

**1.4 Stormwater Pollution Prevention Contact(s)**

This section is intended to facilitate communication between the Airport Authority and the operator tenant. The operator tenant shall provide the contact information to be used for correspondence regarding stormwater compliance measures.

**Table 4. SWPPT Roster**

<b>Tenant Operator Contact (SWPPP):</b>
Name: Deb Bowden, Office Administration
Emergency Contact Telephone number: 541-280-6774
Email address: dbowden@cam-aero.com
Office number: 208-649-5106
<b>Alternate Tenant Operator Contact (SWPPP):</b>
Name: Brian Lubinsky, Director Maintenance
Emergency Contact Telephone number: 208-850-9539
Email address: blubinsky@cam-aero.com
Office number: 208-649-5106

### 1.4.1 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 Airport operations;
- Maintain a 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 site-wide SWPPP;
- Prepare and submit Annual Report to DEQ on behalf of entire Facility and provide hard copy to all tenants when complete.

Operator-tenants required to register for MSGP coverage or no exposure exemptions 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 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
- Immediately notify the Airport Manager of any observed issues with BMPs, spills, leaks, or unauthorized discharges outside of the hangar and work any designated City staff to resolve

Operator-tenants who file for No Exposure Certification must provide all information relative to the filing to the Airport Authority and Owner. They must re-file for coverage every five (5) years, in addition to the MSGP permit. 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 authorized 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 required 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 authorized representative only if:*

*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 false statement, 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.*

### 1.5 General Location Maps

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 2 is a site map of the Caldwell Industrial Airport, showing the location of Cascade Aircraft Management within the Airport property and relative to stormwater management facilities and surface waters.

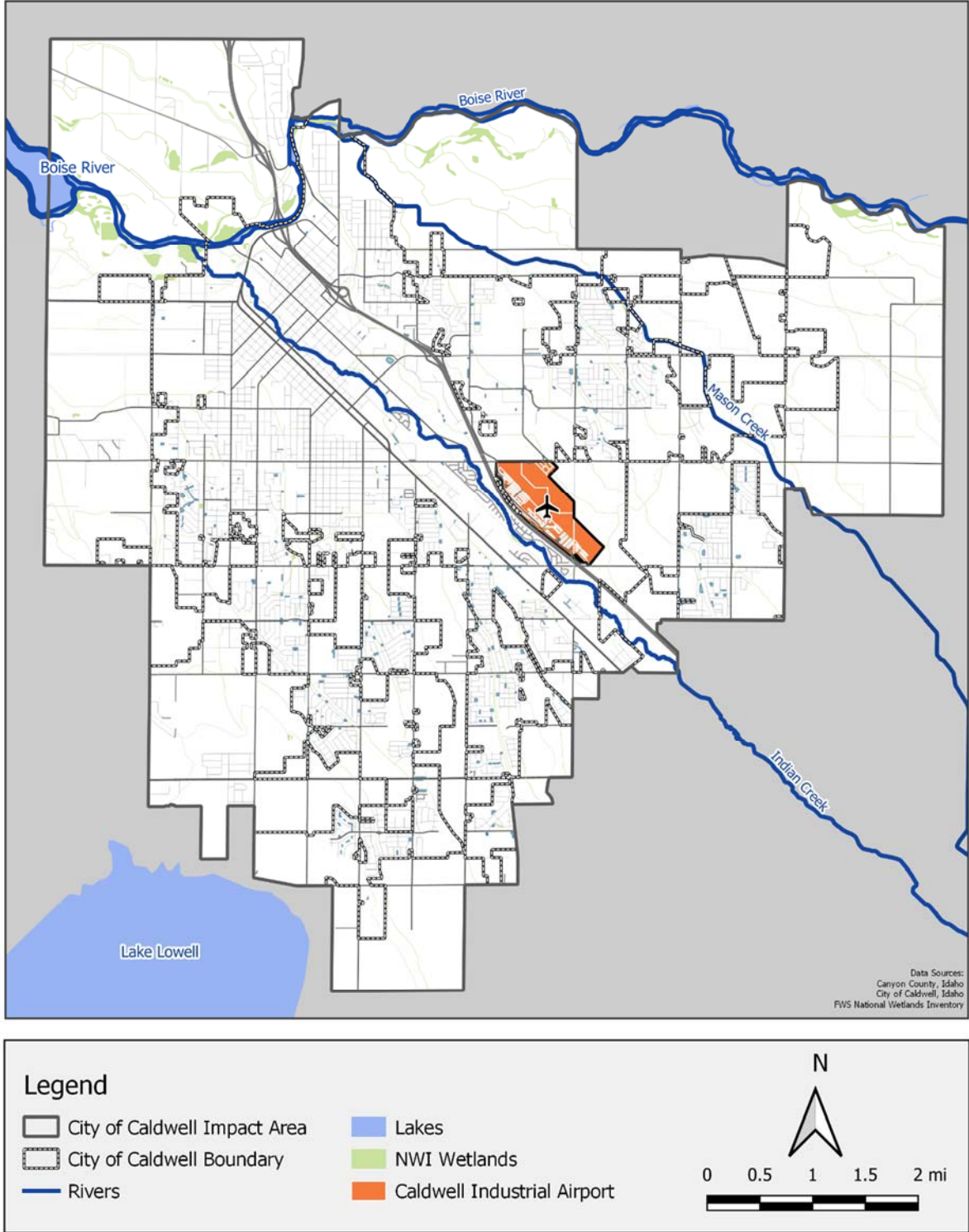


Figure 1. Caldwell Industrial Airport Location

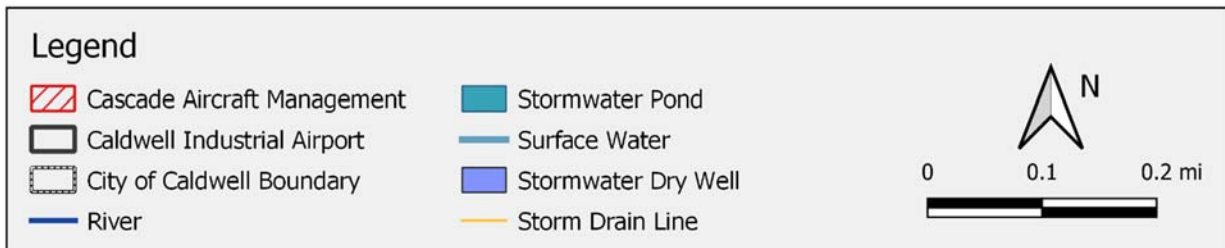


Figure 2. Cascade Aircraft Management Location

### 1.6 Site Map

Figure 3 details the Cascade Aircraft Management site and identifies areas where ongoing activities and storage of materials have the potential to contaminate stormwater runoff.

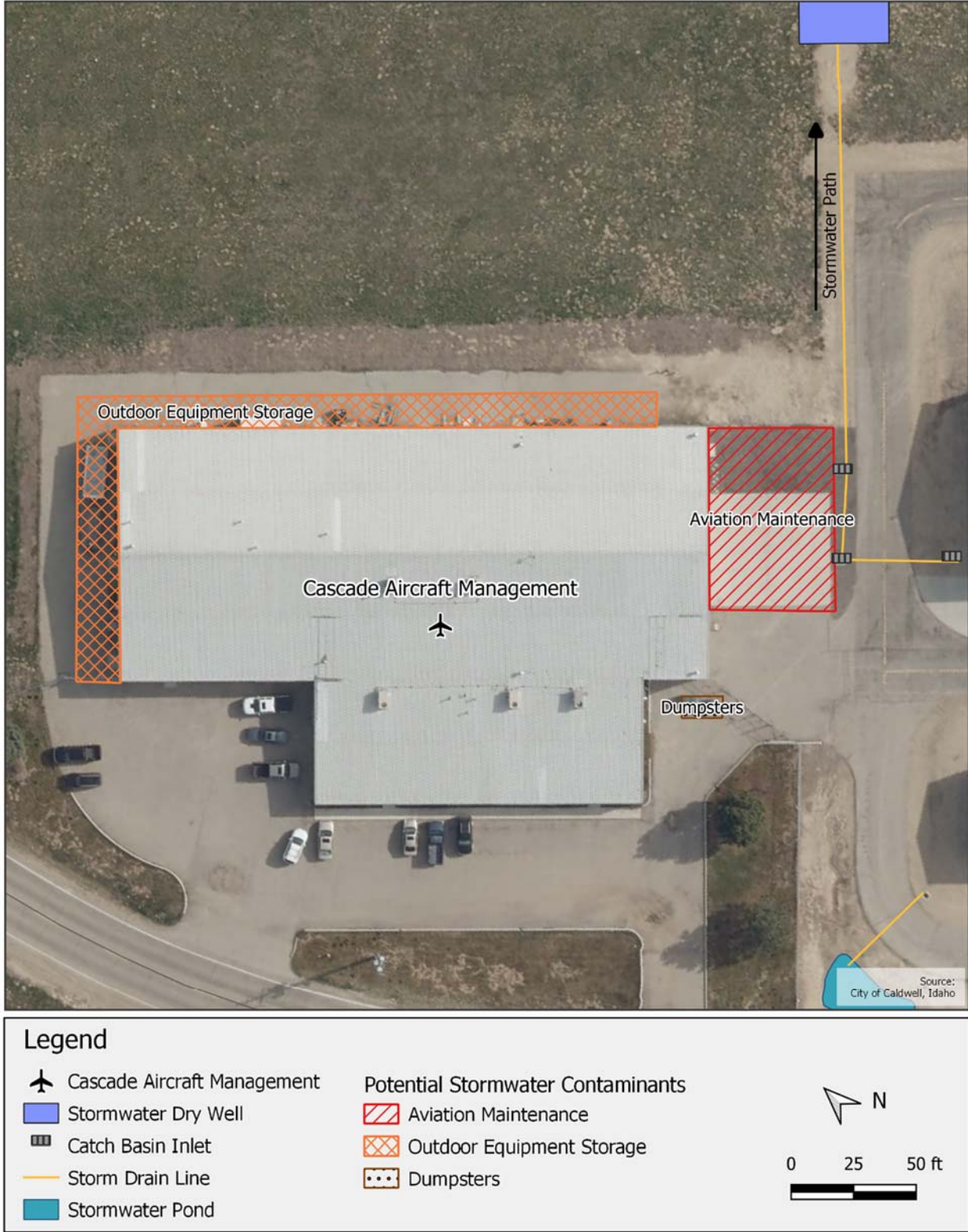


Figure 3. Cascade Aircraft Management Site

## **1.7 Receiving Waters**

Caldwell Industrial Airport is divided into multiple drainage basins (stormwater-sheds). 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 gallery (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 grassy patch, then AP-08 (vegetated swale)
- Skydown Skydiving, LLC – Site discharges to grassy patch, then to AP-06 (pond)

## **1.8 Stormwater Drainage Systems**

Considering the Airport as a whole, approximately half of the stormwater from outfalls is captured in stormwater settling ponds. Depending on the time of year, the water can infiltrate into the ground or runoff to surface water (when groundwater is high). 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.)

Operator-tenants and tenants do not have the authority on site to make modifications to the Airport storm drainage infrastructure. In the locale of Cascade Aircraft Management, the storm drainage infrastructure is as follows: paved concrete or asphalt, to graveled areas, to catch basins to a sand-and-grease trap, then to an infiltration gallery below grade. This hangar does not discharge to surface Waters of the United States.

## **1.9 Activities at the Airport**

Caldwell Industrial Airport provides hangar and tie down space for aviation, flight training, aircraft rentals, aircraft maintenance and charter services through small aviation businesses. No chemical deicing of aircraft or the airfield is conducted currently at the Facility. Under the MSGP, *operators* are defined as those parties who regularly conduct industrial activities at the Airport (vehicle or aircraft maintenance, cleaning, painting, fueling, deicing). This SWPPP is intended for *operator*-tenants.

## 2 POTENTIAL POLLUTANT SOURCES

### 2.1 Industrial Activity and Associated Pollutants

The following table summarizes industrial activities conducted by Cascade Aircraft Management 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 6. Summary of Overall Potential Pollutant Sources by Activity Area.**

Industrial Activity (Indicate whether activity is exposed to stormwater/precipitation)	Associated Pollutants (summary of onsite materials )
Material storage; <i>(Materials are stored inside the hangar)</i>	Fuels, oils, lubricants
Aircraft /equipment maintenance <i>(Maintenance is completed indoors – limited to no exposure to precipitation/stormwater. Waste fuel/oil is removed by Gem state oil recovery services. All paints, thinners, strippers, etc. are contained in a 55 gallon barrel stored indoors and removed from the premises during a HHW collection event. All recycled metal is contained in a bin and recycled using United Metals pickup)</i>	Oils (hydraulic oil, motor oil, etc.), lubricants, paints and painting related materials (thinners, strippers, enamels, primers, etc.), battery acid, solvents
Aircraft/vehicle/equipment cleaning <i>(Cleaning conducted indoors only)</i>	Solvents, detergents

### 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 would be feasible for many operator-tenants to pivot their activities to exclusively work indoors, some may be able to 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 EPA. 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 infeasible 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. 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 should 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.

Operator commits to have a spill kit on hand fully restocked in the event of such accidents.

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 Areas**

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



**Table 7. Material Storage Outside, Exposed to Precipitation/Stormwater.**

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	Unknown Drums	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 pump. Emergency shutoff is accessible and labeled properly.	Label your spill kit and make it available to all refuelers at the self-serve fuel station.
Silverhawk Aviation	Refueling Tankers	SE of Silverhawk Hangar	Spill kit(s) not found on tankers.	Purchase vehicle kits for each refuel tanker. Keep them onboard.
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. <i>In addition, we're requiring a spill kit for this facility due to visible staining outside the hangar.</i>
Midfield Aviation	Stationary Fuel Pump	Along Taxiway, north of hangar	Barricades protecting a double-walled tank. Sunshade protecting the fuel pump. Emergency shutoff is accessible and labeled properly. Spill kit is visible and available to all refuelers at the self-serve fuel station.	Install sunshade over the fuel pump.

### **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. If a large spill or leak were to occur during the maintenance or repair process and 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.

## **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 washwaters 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. washwaters 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 site-wide and individual SWPPPs.

## **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 choose to begin to execute deicing activity shall notify the Airport Authority (Airport Manager) and Owner (City of Caldwell Engineering Department) prior to deicing. 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: 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 Airport site. 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 potentially be exposed.

Potential spills and leaks for Cascade Aircraft Management:

- Removing fluids (aviation fuel, gasoline, lubricants, antifreeze, paints, paint remover, degreasers, etc) from the mechanics of the aircraft spilling from inside the hangar to the outside
- Fuel spill during refueling (performed by others)
- Storage of materials outdoors

Past spills for Cascade Aircraft Management:

- Removing fluids from aircraft on the apron
- Outdoor material storage
- Paint overspray from inside of hangar to outside

## **2.4 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 street sweeper is used, ensure that entire contaminated load is taken to landfill, and not accidentally stored at another location.
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.

## **2.5 Non-Stormwater Discharges**

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 washwaters where no detergents or hazardous cleaning products are used and the washwaters 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 washwaters 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 washdown 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 washwaters 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 come in contact 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.

## **2.6 Salt Storage**

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

## **2.7 Sampling Data Summary**

Operator-tenants do not have authorization to access to the onsite storm drain infrastructure. Stormwater sampling is conducted by the Airport Authority, City of Caldwell. Please contact the Airport Manager for inquiries related to stormwater sampling.

# **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 Minimize Exposure**

The first step of preventing pollutants from contacting stormwater is to minimize the materials 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 efficient 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 which 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 his absence, his 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 washwaters are not covered under the MSGP and require different permitting. (This washwater 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. washwaters 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 site-wide and individual SWPPPs.
- 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 washwater, with the exception of discharges from pavement wash water and detergent-free building washdown, 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 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 implement secondary containment when their materials must be stored outside of the hangar.

### **3.2 Good Housekeeping**

Good housekeeping measures are required under the MSGP. One implication of this is that 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 rags, 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 recommended. Do not place port-o-potties next to catch basin inlets.
- Ensure that waste, garbage, and floatables do not escape to receiving waters; keep outdoor areas free of rubbish.

### **3.3 Maintenance of Equipment, Systems, Control Measures**

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

### **3.4 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 and Skydown Skydiving):

- Fuel tankers commit to 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 aircraft the at all times. If necessary, use dry cleanup methods to absorb drips and spills.

The contact list 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 9. Emergency Contact List.**

<b>CALDWELL INDUSTRIAL AIRPORT SPILL RESPONSE EMERGENCY CONTACT LIST</b>	
<b>Caldwell Industrial Airport Contacts</b>	
Primary Airport Operations Responder Rob Oates, Airport Manager	Office: 24-hr:
Primary Environmental Compliance Responder Emily Johnson, Environmental Engineer	Office: 208-455-3006 24-hr:
Alternate Environmental Compliance Responder Ashley Newbry, Assistant City Engineer	Office: 24-hr:
<b>Town/State Agencies</b>	
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
<b>Federal Agencies</b>	
National Response Center	(800) 424-8802
EPA Region 10 (Emergency Response)	1-800-424-4372 1-206-553-4973
<b>Spill Response Contractors (Two nearby 24-hr contractors listed below)</b>	
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 Environmental 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.

### **3.5 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 airport campus 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 to allow sediment to drop out. We have found the ponds with vegetation to be effective in removing sediment, but they can also increase e-coli via bird activity. If during routine inspections, evidence of scour or erosion/sedimentation is discovered, additional BMPs will be installed as needed.

Street sweeping is conducted by the Caldwell Street Department on an as needed basis.

### **3.6 Management of 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 stormwater from sampling points is captured in stormwater settling ponds. Depending on the time of year, the water can infiltrate into the ground or runoff to surface water (when groundwater is high). The other half of the sampling points are direct pipe discharges to surface water.

Snow is cleared from runways, taxiways, and roadways manually (snow plow), onto permeable surfaces, so that it may

infiltrate into the ground.

### **3.7 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.

### **3.8 MSGP Sector-Specific Non-Numeric Effluent Limits**

#### **8.S.3 Multiple Operators at Air Transportation Facilities.**

The Airport campus is owned and managed by the City of Caldwell. 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. EPA defines “operators” to include those businesses who regularly perform industrial activities (fueling, maintenance, cleaning, painting, lubrication, repairs, deicing) at the 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 or disposed of offsite.

**8.S.4.1.2 Aircraft, Ground Vehicle and Equipment Cleaning Areas.** 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 in designated areas only—in most instances this location shall be entirely inside the lessor’s hangar.

**8.S.4.1.4 Material Storage Areas.** Materials containing contaminants such as petroleum products or chemicals should be stored indoors. A few hangars are outfitted with outdoor storage areas. Dirty mechanical parts and chemical storage may not be stored outside without protection from precipitation and secondary containment.

**8.S.4.1.5 Airport Fuel System and Fueling Areas.** Operators shall 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.

**8.S.4.1.6 Source Reduction.** Deicer not utilized at this site.

### **3.9 Employee Training**

Employees and tenants must attend a stormwater pollution prevention training session upon beginning work or residence at the Airport and at least once annually if they:

- Work in areas where industrial materials or activities are exposed to stormwater
- Are responsible SWPPP execution or documentation of corrective actions (inspectors, maintenance personnel), or
- Are members of the City’s Stormwater Pollution Prevention Team, or
- City staff, tenants, or employees who are responsible for conducting monitoring and inspections,
- Are responsible for storage and handling of chemicals and/or potential pollutants, such as fuel

Training shall be conducted by City Environmental Compliance Staff or the Owner’s designee. This training shall be conducted in addition to any training that operator-tenants or that required by the fuel distribution and sales industry.

The training session shall cover the contents and intent of the SWPPP, BMP's (control measures) and proper maintenance, good housekeeping, material storage and management, spill response, and needs to keep employees and tenants acquainted with the procedures they need to follow. In essence, employees and tenants must appreciate what stormwater is, how pollution can enter, and what they do onsite to prevent this.

An attendance log to be signed by attendees and the trainer must be kept with the site-wide SWPPP held by the Airport Authority.

### **3.10 *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.

### **3.11 *Waste, Garbage and Floatable Debris***

Different kinds of wastes are produced and 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.

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 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.

### 3.12 *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 campus, 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 typical practice because it creates a need for post-snow street sweeping. Street sweeping shall be conducted by the Owner 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. Additional BMP's for the purposes of dust minimization are not proposed at present.

### 3.13 *Applicable Effluent Limitations Guidelines*

Deicer is not offered or utilized by Caldwell Industrial Airport.

<b>Regulated Activity</b>	<b>40 CFR Part/Subpart</b>	<b>Effluent Limit</b>
Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	Part 429, Subpart I	See Part 8.A.7
Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products or waste products (SIC 2874)	Part 418, Subpart A	See Part 8.C.4
Runoff from asphalt emulsion facilities	Part 443, Subpart A	See Part 8.D.4
Runoff from material storage piles at cement manufacturing facilities	Part 411, Subpart C	See Part 8.E.5
Mine dewatering discharges at crushed stone, construction sand and gravel, or industrial sand mining facilities	Part 436, Subparts B, C, or D	See Part 8.J.9
Runoff from hazardous waste landfills	Part 445, Subpart A	See Part 8.K.6
Runoff from non-hazardous waste landfills	Part 445, Subpart B	See Part 8.L.10
Runoff from coal storage piles at steam electric generating facilities	Part 423	See Part 8.O.8
Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures	Part 449	See Part 8.S.8

## 4 COMPLIANCE PROCEDURES

### 4.1 INSPECTIONS, MONITORING (SAMPLING), REPORTING

Tenants and operator-tenants shall note that this section pertains primarily to the responsibilities of the Owner (City of Caldwell) and the Airport Authority. Tenants are required to leave their hangars, apron, and activity areas free of waste, dust, debris at the end of each use period. Any belongings left outside of the hangar should be protected from precipitation if they have the potential to release pollutants. For additional information on inspections, monitoring/sampling, and compliance reporting to EPA, contact the Caldwell Engineering Department or Airport Manager. This information can be found in greater detail in the site-wide SWPPP.

### 4.2 Routine Facility Inspections

Inspection processes 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. For routine facility inspections to be performed at your site, your SWPPP must include a description of the following:

#### 1. Person(s) or positions of person(s) responsible for inspection.

Airport Manager, Assistant City Engineer, Project Engineer, Associate Engineer, Engineering Technician

*Note: Inspections must be performed by qualified personnel with at least one member of your stormwater pollution prevention team participating. Inspectors must consider the results of visual and analytical monitoring (if any) for the past year when planning and conducting inspections. Qualified personnel are those who possess the knowledge and skills to assess conditions and activities that could impact stormwater quality at your facility, and who can also evaluate the effectiveness of control measures.*

#### 2. Schedules for conducting inspections.

Airport Manager – Daily for lessor compliance with lease agreement

Assistant City Engineer; Project Engineer; Environmental Engineer – Storm Events/QVA's (6-8 times per year);

Routine Facility Inspection (4 times per year or quarterly)

Associate Engineer or Engineering Tech – As needed or assigned basis

*Note: Inspections must be conducted at least quarterly (i.e., once each calendar quarter), or in some instances more frequently (e.g., monthly), as appropriate. Increased frequency may be appropriate for some types of equipment, processes and stormwater control measures, or areas of the facility with significant activities and materials exposed to stormwater. At least one of your routine inspections must be conducted during a period when a stormwater discharge is occurring.*

#### 3. List areas where industrial materials or activities are exposed to stormwater.

There is potential for exposure at refueling areas, port-o-potties, and potentially areas where personal belongings are improperly stored outside.

### 4.3 **Quarterly Visual Assessments of Stormwater Discharge**

We utilize the Visual Assessment Form provided by the MSGP template package. We fill out the form and follow the inspection-of-sample procedure from top to bottom.

#### 1. **Person(s) or positions of person(s) responsible for assessments.**

Assistant City Engineer or Project Engineer – Storm Events/QVA's (6-8 times per year)  
Associate Engineer or Engineering Tech – As needed or assigned basis

#### 2. **Schedules for conducting assessments.**

Because QVA's need to be completed in connection with sample collection, there is no set schedule for completion. Caldwell receives approximately 11 inches of rain per year, so we collect and fill out QVA's for the majority of eligible storms (predicted 0.10 inches or greater).

#### 3. **Specific assessment activities.**

We utilize the Visual Assessment Form provided by the MSGP template package. The form includes information about the sample, but also specifics like its color, odor, clarity, presence of floating solids, settled solids, suspended solids, foam, oily sheen, and other indicators. In addition to this, we've instituted measurement of sample temperature to come into compliance with WQBELs.

### 4.4 **Monitoring/Sampling**

Check the following monitoring activities applicable to our 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. 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** (if applicable)

**[Not applicable for Caldwell Industrial Airport, since site is active]**

This site is inactive and unstaffed, and has no industrial materials or activities exposed to stormwater, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii) as signed and certified in Section 7 below.

**Substantially identical discharge point (outfall) exception** (if applicable)

- Location of each of the substantially identical discharge points:
  - Group 1: Discharge to pond with overflow to surface water: AP-02, 04, 06, 09, 10, 11
  - Group 2: Direct discharge (overland or pipe) to surface water: AP-01, 03, 05, 07, 08
  - 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 and AP-05.
- List the control measures implemented in the drainage area of each discharge point:
  - See site maps, which include BMP's.
- 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 and AP-05.
- 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.

## 5 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 studied 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

### 5.1 *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.

### 5.2 *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 permit for requirements. If necessary, the SWPPP should be revised to include any modified BMP control measures.

### 5.3 *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.

## **6 SWPPP MODIFICATIONS/AMENDMENTS**

Each SWPPP is considered a “living document” and may be modified and updated as needed in response to corrective actions or to changes in the facility, stormwater controls, changes in personnel, or changes in Airport or operator tenant activity.

A form for summarizing SWPPP modifications/amendments is included this template. All SWPPP modifications in response to a corrective action must be noted on the log and have the separate form signed and dated by an authorized person in accordance with Appendix B, Subsection 11 of the MSGP. This recertification of the SWPPP shall be maintained in this appendix. For any other SWPPP modification, only the log and date and signature of the person making the change is required.

## 7 SWPPP CERTIFICATION

The following certification statement must be signed and dated in accordance with Part 5.2.7 of the MSGP by a person who meets the requirements of Appendix B, Subsection 11.A or 11.B of the MSGP. Note also that this certification must be resigned if a SWPPP modification is triggered by a Corrective Action in response to Part 4.1 of the MSGP.

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 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: Lee A. Brinley

Signature: 

Organization or Business: CASCADE AIRCRAFT MANAGEMENT

Title: GENERAL MANAGER

Date: 08.24.21

## **8 SWPPP Forms**

See appendix. "Additional MSGP Documentation Template"