Stormwater Pollution Prevention Plan

for:

Caldwell Industrial Airport
4814 E Linden St
Caldwell, ID 83605
208-459-9779

SWPPP Contact(s):

City of Caldwell
Rob Oates, Airport Manager
roates@cityofcaldwell.org
4814 E Linden St
Caldwell, ID 83605
208-459-9779

Ashley Newbry, Asst. City Engineer
anewbry@cityofcaldwell.org
(City Stormwater Program)
621 E Cleveland Blvd
208-455-3006

SWPPP Preparation Date:

01/15/2020
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SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION.

1.1 Facility Information.

Facility Information
Name of Facility: Caldwell Industrial Airport
Street: 4184 E Linden St
City: Caldwell
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”
Latitude/Longitude
Latitude: 43.647954 ° N (decimal degrees)
Longitude: 116.838187 ° 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."
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) (and segment(s), if applicable): 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. See EPA Letter dated 6.15.2016.

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 2015 MSGP, Appendix A)? ☐ Yes ☒ No

Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs) (2015 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

1.2 Contact Information/Responsible Parties.

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)
1.3 Stormwater Pollution Prevention Team.

<table>
<thead>
<tr>
<th>Staff Names</th>
<th>Individual Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ashley Newbry</td>
<td>Engineer supervising compliance activity of the City of Caldwell stormwater programs</td>
</tr>
<tr>
<td>Stormwater Program Engineer</td>
<td></td>
</tr>
<tr>
<td>Associate Engineer</td>
<td>Assistant role for inspections and storm event sampling</td>
</tr>
<tr>
<td>Engineering Technician</td>
<td>Assistant role for inspections and storm event sampling</td>
</tr>
<tr>
<td>Rob Oates</td>
<td>Oversight of airport management; liaison between the City and airport tenants</td>
</tr>
<tr>
<td>Airport Manager</td>
<td></td>
</tr>
<tr>
<td>Robb MacDonald</td>
<td>Oversight of City Engineering Dept.</td>
</tr>
<tr>
<td>City Engineer</td>
<td></td>
</tr>
</tbody>
</table>

1.4 Site Description.

The Caldwell Industrial Airport 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 Airport site. Tenants are allowed to house small (single occupant to charter) airplanes in leased hangars. Lease agreements to 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. Note that not all hangars are equipped with sewer service, so some tenants keep a rented porta potty outside of their hangar structure. Three privately operated stationary fueling sites are located within the Airport site. Some tenants also have refueling vehicles; typically these are operated commercially.
1.5 **General Location Map.**

The general location map for this facility can be found below.

1.6 **Site Map.**

The site maps for this facility can be found in Attachment B.
SECTION 2: POTENTIAL POLLUTANT SOURCES.

Section 2 will describe all areas at your facility where industrial materials or activities are exposed to stormwater or from which allowable non-stormwater discharges originate. Industrial materials or activities include, but are not limited to: material handling equipment or activities; industrial machinery; raw materials; industrial production and processes; and intermediate products, by-products, final products, and waste products. Material handling activities include, but are not limited to: the storage, loading and unloading, transportation, disposal or conveyance of any raw material, intermediate product, final product or waste product. For structures located in areas of industrial activity, you must be aware that the structures themselves are potential sources of pollutants. This could occur, for example, when metals such as aluminum or copper are leached from the structures as a result of acid rain.

For each area identified, the SWPPP must include industrial activities, potential pollutants, spills and leaks, unauthorized non-stormwater discharges, salt storage, stormwater sampling data and descriptions of control measures.

2.1 Potential Pollutants Associated with Industrial Activity.

<table>
<thead>
<tr>
<th>Industrial Activity</th>
<th>Associated Pollutants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aircraft washing (surficial)</td>
<td>Cleaners, sediment</td>
</tr>
<tr>
<td>Aircraft maintenance</td>
<td>Oil and petroleum products, battery acid, paint, lacquer, paint stripper</td>
</tr>
<tr>
<td>Aircraft refueling</td>
<td>Gasoline</td>
</tr>
<tr>
<td>Companion Pets with Pilots</td>
<td>Pet waste</td>
</tr>
<tr>
<td>Waste Disposal</td>
<td>Garbage and litter</td>
</tr>
<tr>
<td>Onsite Porta Potty</td>
<td>Human waste</td>
</tr>
<tr>
<td>Disturbed silty land/Erosion</td>
<td>Sediment</td>
</tr>
</tbody>
</table>

2.2 Spills and Leaks.

<table>
<thead>
<tr>
<th>Areas of Site Where Potential Spills/Leaks Could Occur</th>
<th>Location</th>
<th>Discharge Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Silverhawk (Route 66) Refueling Area</td>
<td>AP-07</td>
<td></td>
</tr>
<tr>
<td>Ascent Refueling Area</td>
<td>Not Connected</td>
<td></td>
</tr>
<tr>
<td>Private Refueling Tank</td>
<td>AP-09</td>
<td></td>
</tr>
<tr>
<td>Porta Potty(s)</td>
<td>All</td>
<td></td>
</tr>
<tr>
<td>Areas where Personal Material is Stored</td>
<td>AP-08; AP-SB01 (groundwater)</td>
<td></td>
</tr>
</tbody>
</table>
Description of Past Spills/Leaks

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Discharge Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/26/2018</td>
<td>Oil filter dumped at catch basin</td>
<td>AP-03</td>
</tr>
<tr>
<td>10/17/2019</td>
<td>Hangar 5017 – used oil container leaking</td>
<td>AP-05</td>
</tr>
<tr>
<td>10/17/2019</td>
<td>Hangar 4411 – engine bath leaking Simple Green cleaner</td>
<td>AP-08</td>
</tr>
<tr>
<td>10/28/2019</td>
<td>Fuel spotting on concrete at Ascent Refueling Area</td>
<td>Not Connected</td>
</tr>
</tbody>
</table>

2.3 Unauthorized Non-stormwater Discharges Documentation.

Description of this facility’s unauthorized non-stormwater discharge evaluation:

- Date of evaluation: Today, 1/13/2020. Non-stormwater discharges are evaluated at each storm event and visual assessment. Outfalls that do not typically discharge groundwater are often empty during the time-of-travel before discharge begins.
- Description of the evaluation criteria used: Evaluation determined using photos of each outfall collection point between 2013 and 2019.
- List of the drainage points that were directly observed during the evaluation:

<table>
<thead>
<tr>
<th>Drainage Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AP-01</td>
<td>Observed flowing groundwater 10/22/2015 and 4/6/2017</td>
</tr>
<tr>
<td>AP-02</td>
<td>Non-stormwater discharge has not been observed</td>
</tr>
<tr>
<td>AP-03</td>
<td>Non-stormwater discharge has not been observed</td>
</tr>
<tr>
<td>AP-04</td>
<td>Observed flowing groundwater 10/22/2015 and seasonally</td>
</tr>
<tr>
<td>AP-05</td>
<td>Non-stormwater discharge has not been observed. Ponding/groundwater observed in lowest trough of AP-05 manhole.</td>
</tr>
<tr>
<td>AP-06</td>
<td>Observed flowing groundwater 10/22/2015, 6/1/2017, 5/24/2019, 10/19/2019 and seasonally</td>
</tr>
<tr>
<td>AP-07</td>
<td>Non-stormwater discharge has not been observed</td>
</tr>
<tr>
<td>AP-08</td>
<td>Excess runoff observed 9/22/2017 (suspect agricultural runoff comingling)</td>
</tr>
<tr>
<td>AP-09</td>
<td>Non-stormwater discharge has not been observed</td>
</tr>
<tr>
<td>AP-10</td>
<td>Non-stormwater discharge has not been observed</td>
</tr>
<tr>
<td>AP-11</td>
<td>Excess runoff observed 6/17/2018 (suspect agricultural runoff comingling)</td>
</tr>
</tbody>
</table>

- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), or documentation that a separate NPDES permit was obtained. For example, a floor drain was sealed, a sink drain was re-routed to the sanitary sewer or an NPDES permit application was submitted for an unauthorized cooling water discharge: None.

2.4 Salt Storage.

We do not have salt storage piles at the Caldwell Industrial Airport.
2.5  **Sampling Data Summary.**

See appendices for laboratory reports during this permit term 2015 to 2020. Formal sampling activity began in 2017 following completion of the Indian Creek TMDL.

**SECTION 3: STORMWATER CONTROL MEASURES.**

3.1  **Non-numeric Technology-based Effluent Limits (BPT/BAT/BCT)**

You must comply with the following non-numeric effluent limits (except where otherwise specified in Part 8) as well as any sector-specific non-numeric effluent limits in Part 8.

3.1.1  **Minimize Exposure.**

Caldwell Industrial Airport strives to minimize exposure by limiting the number of hangars which are allowed to have outdoor storage of personal materials. When tenants keep their private materials and aircraft parts inside their hangar, it reduces the chance of non-stormwater runoff. Lease agreements outline what uses are permissible at each hangar. Typically, tenants are not allowed to store materials outside the hangar. (Some exceptions.)

3.1.2  **Good Housekeeping.**

Waste materials are temporarily stored in dumpsters before weekly garbage pickup service. “Good housekeeping” of personal materials down to pet waste is typically inspected as a part of the quarterly facility inspections. Problem locations are noted in the report, for follow up by the Airport Manager, as needed.

3.1.3  **Maintenance.**

Tenants are required to contain any spills and fluids associated with their maintenance activity. They are allowed to store new or used barrels of oil, for example, inside the hangar only. Tenants must manage and dispose of their own hazardous waste material, such as petroleum products required for aircraft functionality.

3.1.4  **Spill Prevention and Response.**

The City is working with tenant refuelers to ensure that they make spill kits available at each pump and on each refueling truck. In addition, tenant refuelers will need to provide readily visible signage to ensure accessibility to the spill kits. Verification of this requirement will be verified at each quarterly facility inspection, beginning in 2020.

Many of the hangar lessors rent porta pottys because they are not served with City sewer service. We recommend weekly inspection of each porta potty for leaks or secondary containment.

3.1.5  **Erosion and Sediment Controls.**

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 has the intent to reconfigure and/or remove some of the bare-earth settling ponds. 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.

### 3.1.6 Management of 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. The City has some 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).

### 3.1.7 Salt Storage Piles or Piles Containing Salt.

Salt is not stored at our site. Runways, taxiways, and roadways are cleared manually (snow plow).

### 3.1.8 Dust Generation and Vehicle Tracking of Industrial Materials.

Due to the nature of our facility, and Airport, minimization of blowing dust is imperative. A lot of the land surrounding the runway area is leased for farming to ensure that the land remains stabilized throughout the year. Our facility is not a production facility, so we do not anticipate dust as a byproduct of our activity. At times, automobiles drive off of the pavement and cause track out (soil) onto the taxiways. We are monitoring one small parking area which is frequently a source of nuisance track out, tributary to AP-07.

### 3.2 Sector-Specific Non-Numeric Effluent Limits.

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

We do not believe that the tenants of the Caldwell Industrial Airport have the authority to act as individual operators. The Airport campus is owned by and site operations are managed by the City of Caldwell. 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). Per MSGP 1.2.1 each tenant does not qualify to “be an operator of a primary industrial activity in a sector covered by this permit (see Appendix D).” Appendix D designates the “Air Transportation Facility” as the operator.

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. Caldwell Industrial Airport tenants have ownership of their hangar or building structure, but they do not own the land beneath or around it. Tenants are not authorized to make material site modifications or improvements outside of their hangars. Therefore, tenants do not have authority to discharge stormwater or make modifications to the Airport storm drain system.

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

8.S.4.1 Good Housekeeping Measures. (See also Part 2.1.2.2)
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. (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 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 must be stored indoors. A few hangars are outfitted with outdoor storage areas. Dirty mechanical parts and chemical storage may not be stored outside without secondary containment.

8.S.4.1.5 Airport Fuel System and Fueling Areas. We intend to 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.

3.3 Numeric Effluent Limitations Based on Effluent Limitations Guidelines.

Deicer is not offered or utilized by Caldwell Industrial Airport.

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

The storm drain system is operated and managed by the City of Caldwell. We 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. 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.

**Ponds AP-04 and AP-06.** Some exceedances are due to the nature of our pond-type BMP’s. AP-04 and AP-06 are retention ponds which capture the sediment in taxiway runoff. Both of these ponds intercept groundwater flow; the outfalls run water during dry weather. Depending on the weather, these sites attract bird activity. Our sampling personnel have sampled the outfall during a storm event, which resulted in E.coli exceedances. In order to avoid the E.coli and groundwater intrusion influence, we alternated to sampling the pond inlet from the taxiway. This method bypasses our pond BMP, and can result in elevated TSS in the samples, so it is also not ideal.

**Borrow Ditch AP-08.** Our sampling personnel have only ever seen this outfall run water one time – the time it was sampled. We believe that the sample was co-mingled with agricultural flow, in order to discharge a quantity sufficient for collection.

**Outfall AP-07.** As a bit of background, AP-07 discharges quite frequently-nearly each time that we have a measurable storm event. We are still attempting to troubleshoot the intermittent causes of excess TSS and phosphorus. Half of the airplane tie-down area (outdoor tethered parking) and one fueling area are tributary to this outfall. Based on a review of aerial imagery, TSS may be elevated due to soil track-out from small (2,000 sq. ft.) unpaved parking area nearby. We also noticed two phosphorus violations, one year apart. We are unsure of the cause of this and plan to add focus to this area in future facility inspections. We do not think the excess phosphorus is caused by the refueling activity. Rather, due to the cyclical nature of the occurrence, we suspect that the outfall may be influenced by elevated phosphorus in seasonal high groundwater.

**SECTION 4: SCHEDULES AND PROCEDURES.**

4.1 **Good Housekeeping.**

The Caldwell Industrial Airport receives weekly garbage disposal service. The Airport is not a byproduct or waste-generating facility.

4.2 **Maintenance.**

This part not applicable.

4.3 **Spill Prevention and Response Procedures.**

We see the need to improve spill prevention and emergency response onsite. Emergency shutoff and response signage are onsite, but the available City personnel were not able to locate the fuel spill kits.
during the inspection. No refueling attendants were on duty. Since the inspection, we have notified our tenants with refueling sites of the need to provide readily visible, available, and accessible spill kits. We plan to inspect these sites for compliance at the first quarterly facility inspection in 2020.

4.4 Erosion and Sediment Control.

Polymers and chemicals not used for ESC at the Airport.

4.5 Employee Training.

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, IDDE, onsite housekeeping, leak prevention and cleanup procedure, etc.

The Stormwater Program personnel are responsible for:

- Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- Personnel responsible for the storage and handling of chemicals and materials that could become contaminants in stormwater discharges;
- Personnel who are responsible for conducting and documenting monitoring and inspections.
- The SWPPP
- Spill response procedures, good housekeeping, maintenance requirements, and material management practices;
- The location of all controls on the site required by this permit, and how they are to be maintained;

These activities 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.

4.6 Inspections and Assessments.

4.6.1 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 or Project 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, porta potties, and potentially areas where personal belongings are improperly stored outside.

4. List areas identified in the SWPPP (section 1 of the SWPPP Template) and any others that are potential pollutant sources (see Part 5.2.3).

<table>
<thead>
<tr>
<th>Industrial Activity</th>
<th>Associated Pollutants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aircraft washing</td>
<td>Soaps, cleaners</td>
</tr>
<tr>
<td>Aircraft maintenance</td>
<td>Oil and petroleum products, battery acid, paint, lacquer, paint stripper</td>
</tr>
<tr>
<td>Aircraft refueling</td>
<td>Gasoline</td>
</tr>
<tr>
<td>Companion Pets with Pilots</td>
<td>Pet waste</td>
</tr>
<tr>
<td>Waste Disposal</td>
<td>Garbage and litter</td>
</tr>
<tr>
<td>Onsite Porta Potty</td>
<td>Human waste</td>
</tr>
<tr>
<td>Disturbed silty land/Erosion</td>
<td>Sediment</td>
</tr>
</tbody>
</table>

5. Areas where spills and leaks have occurred in the past 3 years.

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Discharge Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/26/2018</td>
<td>Oil filter dumped at catch basin</td>
<td>AP-03</td>
</tr>
<tr>
<td>10/17/2019</td>
<td>Hangar 5017 – used oil container leaking</td>
<td>AP-05</td>
</tr>
<tr>
<td>10/17/2019</td>
<td>Hangar 4411 – engine bath leaking Simple Green cleaner</td>
<td>AP-08</td>
</tr>
<tr>
<td>10/28/2019</td>
<td>Fuel spotting on concrete at Ascent Refueling Area</td>
<td>Not Connected</td>
</tr>
</tbody>
</table>

6. Inspection information for discharge points. SEE SITE MAP 5 FOR ALL DISCHARGE LOCATIONS.

7. List the control measures used to comply with the effluent limits contained in this permit. SEE SITE MAP 4 FOR ALL DISCHARGE LOCATIONS.

8. Other site-specific inspection objectives. Our main objective for onsite inspections is to maintain FAA and EPA (MSGP) compliance.
4.6.2 Quarterly Visual Assessment of Stormwater Discharges.

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.

For quarterly visual assessments 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 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.

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

☐ 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.

If you are invoking the exception for inactive and unstaffed sites for your routine facility inspections and/or quarterly visual assessments, include information to support this claim.

Not applicable.

4.7 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:
Select type of monitoring activity from drop-down list below (if subject to more than one type of monitoring activity, you will need to copy and paste the items below for each monitoring activity):

**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
2. **Pollutants to be sampled.** Temperature, TSS, Phosphorus, E.Coli
3. **Monitoring Schedules.** Quarterly, as required in DMR system.
4. **Numeric Limitations.** Temperature: 4 Deg C; TSS: 19 mg/L; Phosphorus: 19 mg/L; E.Coli: 30 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.

**Inactive and unstaffed sites exception (if applicable)**

☐ 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)**

If you plan to use the substantially identical discharge point exception for your benchmark monitoring and/or quarterly visual assessment requirements, include the following information here to substantiate your claim that these discharge points are substantially identical (2015 MSGP Part 5.2.5.3):

- 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 map 4.
• 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.

SECTION 5: DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS.

5.1 Documentation Regarding Endangered Species.

See attachment “Slickspotted Peppergrass.”

5.2 Documentation Regarding Historic Properties.

Not applicable.

SECTION 6: CORRECTIVE ACTIONS.

Corrective actions and recommendations are identified in each routine (quarterly) facility inspection report.
SECTION 7: SWPPP CERTIFICATION.

Instructions (see 2015 MSGP Part 5.2.7):
The following certification statement must be signed and dated by a person who meets the requirements of Appendix B, Subsection 11.A, of the 2015 MSGP.

Note: this certification must be re-signed in the event of a SWPPP modification in response to a Part 4.1 trigger for corrective action.

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 submitted. 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: ________________________________ Title: ________________________________

Signature: ________________________________ Date: ____________________________
SECTION 8: SWPPP MODIFICATIONS.

Instructions (see 2015 MSGP Part 5.3):
Your SWPPP is a “living” document and is required to be modified and updated, as necessary, in response to corrective actions. See Part 4 of the 2015 MSGP.

- If you need to modify the SWPPP in response to a corrective action required by Part 4.1 or 4.2 of the 2015 MSGP, then the certification statement in section 7 of this SWPPP template must be re-signed in accordance with 2015 MSGP Appendix B, Subsection 11.A.

- For any other SWPPP modification, you should keep a log with a description of the modification, the name of the person making it, and the date and signature of that person. See 2015 MSGP Appendix B, Subsection 11.C.

SWPPP ATTACHMENTS

Attach the following documentation to the SWPPP:

Attachment A – General Location Map
Include a copy of your general location map in Attachment A. (located in section)

Attachment B – Site Map
Include a copy of your site map(s) in Attachment B.

Attachment C – 2015 MSGP
Note: it is helpful to keep a printed-out copy of the 2015 MSGP so that it is accessible to you for easy reference. However, you do not need to formally incorporate the entire 2015 MSGP into your SWPPP. As an alternative, you can include a reference to the permit and where it is kept at the site.