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Environmental Health and Safety (EHS) Policy

Storm Water Pollution Prevention Plans (SWPPP)

Regulatory Reference: 40 CFR 122, EPA Administered Permit Programs: The National Pollutant Discharge Elimination System (NPDES); 40 CFR 123, State Program Requirements; and State Specific Storm Water Regulations.

Purpose: The purpose of this Storm Water Pollution Prevention Plan (SWPPP) Program is to establish a framework for each Fixed Base Operation (FBO) to become and remain compliant with Federal Environmental Protection Agency (EPA) rules as well as state specific rules for storm water discharge permitting and control.

Airports typically have an airport wide storm water permit obtained from the state environmental regulatory agency. This permit typically includes sampling requirements (usually managed by the airport authority), storm water pollution prevention team members (may or may not include tenant facilities), inspection requirements (may or may not include tenant facilities), training requirements, and requirements for the preparation of a SWPPP.

General Requirements:

As described above, airports typically have an airport wide storm water permit and may or may not have provisions for tenants. Each FBO should have a copy of the airport's permit and also the site specific SWPPP to ensure they are aware of all local requirements. The SWPPP should include a description of site specific Best Management Practices.

Typical Best Management Practices for airport facilities include the following.

- Good Housekeeping.
- Proper fuel transfer activities.
- Proper management of refueler trucks.
- Proper vehicle and equipment maintenance.
- Proper outside storage of materials.
- Proper handling of sumped fuel from aircraft.

Spills must be reported to the EHS/Safety Department. Spill reporting to regulatory agencies should follow the requirements in the site specific Spill Prevention Control and Countermeasures (SPCC) Plan.

Responsibilities:

1. Employees:

Employees are required to perform routine work activities in an environmentally responsible manner. Sensitive activities include the following.

- Fuel and chemical storage.
- Fuel transfers.
- De-icing operations.
- Maintenance activities outside.
- Vehicle storage outside.
- Material storage outside.
- Sumping activities from aircraft.

Employees commonly make transfers of accumulated rain water from secondary containment areas. When these transfers are made, a notation must be made in the facility log book documenting the estimated amount of water released, the date, the time, a statement that the water contained no fuel (even a sheen), and a statement that the valve was closed and secured after the transfer.

Employees are required to maintain proper housekeeping in all work areas. Keeping work areas neat and clean is an important first step in maintaining good storm water control.

Employees must follow the Best Management Practices (BMPs) as defined in the Storm Water Pollution Prevention Plan and also as presented in the training. Examples of BMPs are provided in the General Requirements section of this procedure.

Employees are required to make an initial response to a spill if it occurs as defined in the SPCC Plan.

All employees that perform activities that may impact storm water quality must participate in initial and annual training to refresh their understanding of the EPA rules, the state rules, and the Storm Water Pollution Prevention Plan. The training must include the items shown in the Training section of this procedure.

Employees often perform routine monthly or quarterly inspections of areas that may impact storm water quality. Inspections must follow the checklist provided in the site specific SWPPP and maintained per the Recordkeeping section of this procedure.

2. Managers/Supervisors:

Managers/Supervisors must ensure that employees are performing their work activities in a proper manner including housekeeping, Best Management Practices, and general storm water control.

Managers/Supervisors must ensure that employees respond appropriately to spills. Managers/Supervisors must notify the EHS/Safety Department and must make notifications to Federal, State, and Local environmental regulatory agencies in event of a spill as required by the site specific SPCC Plan. Managers/Supervisors must coordinate activities of environmental response contractors that may be assisting in the clean-up activities after a spill.

Managers/Supervisors must ensure employees participate in the required training and perform inspections.

3. EHS/Safety Department:

The Environmental Health and Safety (EHS)/Safety Department will provide assistance for ensuring that each facility is compliant with the Airport's storm water permit and SWPPP.

The EHS/Safety Department will assist FBOs in setting up initial "train the trainer" sessions and can assist in any environmental questions that may arise.

The EHS/Safety Department must be notified of any reportable spill event and will properly document in the company tracking system.

Training:

The company has developed a general training program that assists the FBOs with the general compliance with the storm water regulations. This training includes a discussion of the regulatory framework, impacts of airport facilities, housekeeping, Best Management Practices, and also utilizes a video.

The EHS/Safety Department has provided assistance to the FBOs in conducting a train the trainer session and provided necessary training documents. Each FBO is responsible for conducting subsequent training for all employees that could impact storm water quality.

The site specific SWPPP should include initial and annual training requirements for all employees that could impact storm water quality. Training activities should include the following items.

- Pollution control laws, rules, and regulations.
- General facility operations
- Housekeeping practices.
- Best Management Practices (BMPs).
- Materials management.
- Spill response.
- Discussion of previous discharges, malfunctioning components, and new precautions

Recordkeeping:

Documentation of the following SWPPP activities must be maintained.

- Transfers of accumulated rain water must be documented in the facility log book or documented on a checklist. These documents must be maintained for a period of three (3) years.
- Facility inspections must follow the checklist provided in the site specific SWPPP and typically must be maintained for a period of three (3) years.
- Training records must document who received SWPPP training, the dates of the training, and the topics covered. These documents typically must be maintained for a period of three (3) years.