2015 Industrial Stormwater Multi-Sector General Permit Requirements for Air Transportation Facilities

Annual AirTAP Fall Forum
October 9-10, 2014

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Overview

- 2015 Permit Timeline
- What’s the same from 2010 Permit?
- What’s new in the 2015 Permit?
- Air Transportation Monitoring Results
- Q&A
2015 ISW Permit Timeline

Done

- October 2013 – March 2014: 2015 permit draft completed
- March 31 – April 30, 2014: 30-day public notice period
- May–June 2014: 2015 draft permit edited after public comments
- June 23, 2014: 2015 draft permit approved
- July 7 – October 5, 2014: Application period for 2015 Permit/No Exposure
2015 ISW Permit Timeline

Coming Up

- Apply now to avoid being out of compliance!

- April 5, 2015: 2015 Permit in effect until April 5, 2020

- July 1, 2015: Quarterly sampling begins

- Apply now to avoid being out of compliance!
Sector S
By the Numbers

2010–2015 Permit
- 177 Permittees
  - 133 General Permit
  - 43 No Exposure

2015–2020 Permit*
- 54 Permittees
  - 31 General Permit
  - 23 No Exposure

(*as of 9/19/14)
Where did everybody go?

<table>
<thead>
<tr>
<th>Time</th>
<th>To</th>
<th>Gate</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>09:00</td>
<td>NEW YORK</td>
<td>3</td>
<td>LAST CALL</td>
</tr>
<tr>
<td>09:20</td>
<td>PARIS</td>
<td>4</td>
<td>BOARDING</td>
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<tr>
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<td>SYDNEY</td>
<td>A</td>
<td>GO TO GATE</td>
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<tr>
<td>10:00</td>
<td>HONG KONG</td>
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<td>ON TIME</td>
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<td>LONDON</td>
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<td>MONTREAL</td>
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<td>11:00</td>
<td>NEW YORK</td>
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<td>ON TIME</td>
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Where did everybody go?

July 7- October 5, 2014 Application period for 2015 Permit/No Exposure

“Pssst....Today is October 10, 2014”

Apply now to avoid being out of compliance!
2015 Industrial Stormwater Permit
What’s the same?

- Still have S1 and S2 subsectors, same monitoring parameters
- Still need a SWPPP prior to applying
  - Can update your existing one
- Still do quarterly benchmark monitoring
- Still send in ‘No Flow’ if No Flow conditions
2015 Industrial Stormwater Permit
What’s the Same?

Still need to take action if exceed benchmark monitoring thresholds

Still allowed to use existing Infiltration Devices (i.e. ponds) or meet design criteria for new ones

Still submit quarterly SWMRs, Annual Reports, and Annual Fees
What’s New

☑ New Subsector S3

☑ Existing and new Primary Airports with ≥1,000 annual jet departures that discharge wastewater associated with airfield pavement deicing that contains urea comingled with stormwater

☑ Has an Effluent Limit Monitoring for Nitrogen, no Benchmark Monitoring Requirements

☑ Added by EPA
  ◦ Encourage large airports to use non-urea deicing agents
What’s New?

SWPPP requirements
- All Permittees need BMPs to minimize dust generation and vehicle tracking of significant materials
  - Vehicle tracking has 24 hour removal requirement
- IF a retention pond and using flocculants, must manage the chemicals and have proper erosion control

Calculating Benchmark Monitoring Averages
- Begin Monitoring 1st calendar quarter after receive permit coverage – must collect 4 quarters, ‘rolling average’
- Monitoring Calendar and SWMR Forms?
Initially, low compliance with turning in SWMRs
  • No Flow SWMRs not submitted
  • Confusion over who was responsible to send in the SWMRs
    • Multiple tenants at airports

But perseverance paid off!
  • No Flow issues resolved (right?)

Really good Benchmark Monitoring results from proper BMP management
## Sector S Monitoring Results Overview

<table>
<thead>
<tr>
<th>Parameter</th>
<th>2012 Average (mg/L)</th>
<th>2014 Average (mg/L)</th>
<th>2014 Statewide Avg (mg/L)</th>
<th>Permit Threshold</th>
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</thead>
<tbody>
<tr>
<td>TSS</td>
<td>40</td>
<td>40</td>
<td>197</td>
<td>100/65</td>
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<tr>
<td>BOD5</td>
<td>85</td>
<td>85</td>
<td>122</td>
<td>25</td>
</tr>
<tr>
<td>COD</td>
<td>112</td>
<td>113</td>
<td>285</td>
<td>120</td>
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<tr>
<td>$N_{(Total, as \text{Ammonia})}$</td>
<td>0.30</td>
<td>0.29</td>
<td>0.89</td>
<td>2.80</td>
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Possible reasons BOD5 is still elevated?
BMPs to Help Minimize Stormwater Contamination

- Dedicated deicing areas (pads)
- Recycle deicing fluids
  Denver International
BMPs to Help Minimize Stormwater Contamination

Avoiding spills and cleaning up (no matter the size)
BMPs to Help Minimize Stormwater Contamination

- Secondary containment/bermed fueling areas

- Other suggestions?
BMPs to Help Minimize Stormwater Contamination

- Use alternatives to deicing chemicals

- (Um......OK...maybe not this BMP...)
Infrared De-icing Technology

Commercial US and AFBs

Other Options?

What works for for YOUR airport?

SHARE your stories!
Quiz – Surprise!

Q: Are deicing and refueling considered “exposure”?
   A: Yes

Q: Can planes landing/taking off with no other industrial activity qualify for No Exposure?
   A: Only if no fueling, de-icing, or maintenance is taking place. Planes must be properly maintained and not leaking anything.
Questions/Answers

Q: How are mobile fueling operations regulated?
   A: Mobile operations apply for the permit, sample quarterly, same as all permittees.

Q: Do leased facilities at airports need their own ISW permit?
   A: Yes. Each leased facility at an airport that has regulated industrial activities needs an ISW permit.
Questions/Answers

Q: Does the owner/Airport Authority need their own ISW Permit?
A: Yes. The ISW permit is tied to physical location and both the owner/airport authority and tenants need ISW permit. There may be overlap of monitoring locations and some duplication of reporting – this is OK!

Q: Who’s responsible when a benchmark value is exceeded?
A: The permit holder (facility or mobile operation) is responsible. If there are shared monitoring locations, the airport authority will want to coordinate with tenants.
Questions/Answers

Q: Are benchmark values flexible?
A: No. Values are set by EPA. Exceedance is not a violation, not addressing the exceedance is.

Q: Will 2015 SWPPPs be the same as 2010 SWPPPs?
A: 2015 SWPPP requirements are similar. One addition is all permitted facilities need to address vehicle tracking of sediment in their BMPs.
ISW Program Staff

<table>
<thead>
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Thanks for your Attention