

STORM WATER POLLUTION PREVENTION PLAN



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STORM WATER POLLUTION PREVENTION PLAN CERTIFICATION

for

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City of Austin
Department of Aviation
3600 Presidential Boulevard
Austin, Texas 78719

"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 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."

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***See Appendix A for completed certifications and the forms section for an electronic copy.**

PREFACE

This Storm Water Pollution Prevention Plan (SWP3) has been prepared by the City of Austin (COA) Department of Aviation (DOA) for the Austin-Bergstrom International Airport (ABIA). This SWP3 provides the information needed to guide the DOA and ABIA Tenants in the identification of potential sources of pollution, and the implementation of work practices and other actions that will prevent or control the potential for degradation of storm water runoff. This SWP3 has been prepared pursuant to the requirements of the Texas Pollutant Discharge Elimination System (TPDES) regulations, which became effective Monday, August 20, 2001 and the latest update of the permit occurred on August 14, 2021. The TPDES program is administered by the Texas Commission on Environmental Quality (TCEQ) under the Clean Water Act, Section 402 and Section 26.040 of the Texas Water Code. Prior to TPDES, ABIA's SWP3 was required pursuant to the National Pollutant Discharge Elimination System (NPDES) program which is administered by the U.S. Environmental Protection Agency (EPA). ABIA's original storm water discharge permit was issued by the EPA on November 17, 1997 (Permit No. TXR05D148). The DOA TPDES permit number is TXR05N459. Regulated DOA tenants participating in this shared SWP3 have their own TPDES permit numbers, which are included in a table in Appendix A.

This SWP3 is intended for use by the DOA and ABIA Tenants. The SWP3 has been designed to facilitate:

- 1) effective management of the materials that can contribute to the degradation of storm water runoff, and
- 2) consistent administration of ABIA's storm water pollution prevention program.

By implementing the SWP3, the intended results are improved water quality through the reduction of pollutants contained in storm water discharges, and compliance with both State- and COA-mandated storm water regulations.

The information presented herein represents a compilation of data the DOA obtained through a variety of efforts including assimilation of ABIA Tenant responses to questionnaires, site reconnaissance observations at DOA and Tenant facilities, and engineering reviews of available ABIA storm drain piping plans and schematics. This SWP3 represents a "living" document that must be routinely updated and revised to reflect changes at ABIA.

It should be recognized by all involved that the ABIA facility comprises many different industrial operators who work both collectively and independently. This operational fact creates a special challenge to the successful implementation of the SWP3 and ABIA's compliance with TPDES and COA storm water regulations. This challenge will only be met through proactive cooperation and participation by all ABIA operators.

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Agency Forms:

- Notice of Intent (NOI) – Electronically submitted to TCEQ
- Notice of Chance (NOC) – Electronically submitted to TCEQ
- Notice of Termination (NOT) – Electronically submitted to TCEQ
- Discharge Monitoring Report Form
- Hazardous Metals Annual Monitoring Exclusion for Storm Water Discharges Associated with Industrial Activity Under the TPDES Multi-Sector General Permit
- No Exposure Certification (NEC) – Electronically submitted to TCEQ

ABIA SWP3 Forms:

- Form 8-1 ABIA Tenant Facility SWP3 Team Personnel Information
- Form 8-2 Training Record Form and Generic Training Program Outline
- Form 10-1 Spill Incident Report
- Form 10-2 De-Icing/Anti-Icing Chemical Use Record
- Form 10-3 De-Icing/Anti-Icing Area Inspection Record
- Form 12-1 Quarterly SWP3 Inspection
- Form 12-2 Annual SWP3 Comprehensive Site Compliance Inspection
- Form 12-3 Annual Comprehensive Site Compliance Inspection Certification
- Form C-1 Record of Quarterly Visual Storm Water Monitoring
- Form C-2 Record of Annual Outfall Monitoring Event
- Certification Storm Water Pollution Prevention Plan Certification for ABIA

APPENDICES

Appendix A	NOI and Permit Certificate
Appendix B	TXR050000 MSGP Regulations
Appendix C	Storm Water Monitoring Plan
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Appendix E	Best Management Practices and DOA Policies and Procedures
Appendix F	Spill Response Plan
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Appendix K	Abbreviations and Definitions
Appendix L	SWP3 Modifications
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1.0 INTRODUCTION

Austin-Bergstrom International Airport (ABIA) is managed and operated by the City of Austin (COA) Department of Aviation (DOA). The DOA is responsible for providing storm water oversight for Tenants who conduct industrial activities at the airport. The activities comprise a wide variety of aircraft, vehicle, and/or ground service equipment (GSE) operations and maintenance including engine repairs, lubrication, rehabilitation, painting, fueling, fuel and chemical storage, material handling, cleaning and janitorial services, hotel and catering services, vehicle rentals, and airport and aircraft de/anti-icing activities.

Based on the nature of ABIA operations, the DOA and most of ABIA's Tenants are subject to the Texas Pollutant Discharge Elimination System (TPDES) regulations, which were promulgated under Section 402 of the Clean Water Act and Section 26.040 of the Texas Water Code. The DOA and most of the ABIA Tenants are also subject to storm water regulations promulgated under Title VI Chapter 6-5 of the Austin City Code. Both the TPDES and COA regulations are designed to protect the physical, chemical, and biological quality of storm water discharges emanating from certain types of industrial operations.

The DOA, and ABIA's TPDES-regulated Tenants, have obtained TPDES permit coverage for storm water discharges under General Permit (GP) No. TXR050000. The GP became effective on August 20, 2001, and was renewed in 2006, 2011, 2016 and 2021. The current GP became effective August 14, 2021 and will expire 5 years from this effective date. The Texas Commission on Environmental Quality (TCEQ) administers the GP.

1.1 STORM WATER POLLUTION PREVENTION PLAN REQUIREMENTS

In accordance with the GP requirements, industrial facilities such as ABIA are required to prepare, maintain, and implement a Storm Water Pollution Prevention Plan (SWP3). At a minimum, the SWP3 must:

1. Identify actual and potential sources of pollution that may reasonably be expected to affect the quality of storm water discharges from the facility.
2. Establish practices and controls to prevent or effectively reduce pollution in storm water discharged from the facility and to help ensure compliance with the terms and conditions of the ABIA storm water permit.
3. Describe how the selected practices and controls are appropriate for the facility and how each will effectively prevent or lessen pollution.
4. Discuss how practices and controls relate to each other such that together they comprise an integrated, facility-wide approach for pollution prevention in storm water discharges.
5. Describe the maintenance program for structural controls.
6. Describe how the SWP3 implementation responsibilities of the DOA and co-located facilities are divided, and overlap, at areas of common use.

This SWP3 has been developed by the DOA to meet these TPDES requirements. In addition, where applicable, this SWP3 has been supplemented with the protocol and procedures necessary to meet COA water quality criteria as well.

1.2 ELEMENTS OF THIS STORM WATER POLLUTION PREVENTION PLAN

This SWP3 establishes a means by which the DOA and its Tenants can facilitate effective management of storm water across the multi-use, multi-Tenant ABIA facility. The major elements of this SWP3 are as follows:

- **Section 2:** Describes the TPDES permitting process used by the DOA, including a discussion of how the permit applies to, and is used by, ABIA Tenants.
- **Section 3:** Provides a general description of ABIA facility operations and setting.
- **Section 4:** Provides a detailed description of the site drainage and the facility's current storm water management systems and structural controls.
- **Section 5:** Provides a general description of the Tenant activities, including Tenant-specific identification of potential pollutant sources and a description of the storm water BMPs and DOA policies and procedures applicable to each industrial Tenant's operations.
- **Section 6:** Describes the DOA's evaluation of non-storm water discharges.
- **Section 7:** Describes the DOA's evaluation for wetlands.
- **Section 8:** Describes SWP3 permit requirements pertaining to the establishment of a SWP3 Team, and describes the employee training program.
- **Section 9:** Sets forth the requirements pertaining to notices for permit coverage and SWP3 modifications.
- **Section 10:** Describes SWP3 record keeping and reporting requirements.
- **Section 11:** Describes the DOA's program for monitoring storm water discharges at ABIA.
- **Section 12:** Describes TPDES inspection and compliance evaluation requirements.

This SWP3 and associated appendices are intended to provide the information and supporting documents needed to facilitate successful compliance with the TPDES and COA storm water regulations. The DOA wishes to emphasize, however, that successful compliance with the SWP3 will only be accomplished through proactive and cooperative participation by all ABIA operators. It is ultimately the responsibility of each operator to comply with the SWP3 requirements and all other applicable regulations.

2.0 ABIA PERMITTING APPROACH AND REQUIREMENTS

This SWP3 has been developed in consideration of the fact that operations at ABIA include co-located operators who are subject to the TPDES regulations and other operators who are categorically exempt from TPDES, but who are subject to COA storm water requirements as well as DOA-mandated Policies and Procedures. To ensure ABIA maintains facility-wide compliance, **the DOA is requiring that all ABIA Tenants whose activities have the potential to impact storm water, follow Policies and Procedures outlined in Appendix E of the SWP3.** Depending on the specific nature of operations at a particular facility, one Tenant's participation in this SWP3 may be relatively more or less than another. A discussion of the specific storm water requirements is provided in the following sections.

2.1 TPDES GENERAL PERMIT APPLICABILITY AND EXCLUSIONS

The TPDES GP requirements are applicable to particular facilities based on their Standard Industrial Classification (SIC) code or Industrial Activity Code (IAC). These codes are used to categorize industries according to the nature of operations conducted. In general, ABIA Tenant operations that have the potential to produce storm water pollutants, such as chemical contaminants or suspended solids, have SIC Codes that make them subject to TPDES permit requirements. Other Tenant operations at ABIA, such as shuttle and hotel services, are excluded from TPDES regulations, based on their SIC codes. A list of each of ABIA's industrial Tenants, their respective SIC codes, and a determination as to the TPDES permit applicability is presented in Table 2-1. A description of each of the SIC codes listed is provided in Part II of the TPDES GP located in Appendix B.

In certain cases, a Tenant that is subject to TPDES based on its SIC Code may obtain a "no-exposure" exclusion. To qualify for this exclusion, however, a facility must demonstrate that their material handling operations are completely sheltered and protected such that there is no potential for storm water to be exposed to "significant materials" (i.e., chemicals, wastes, sediments, etc.). Facilities obtaining this exclusion are subject to inspections by the TCEQ, or DOA, to ensure site operations and conditions are consistent with the exclusion criteria.

2.2 CITY OF AUSTIN STORM WATER DISCHARGE PERMIT

The COA storm water program is administered by the Watershed Protection and Development Review Department. The COA storm water rules apply to a variety of industries including motor rebuilding and repair, machine shop services, fuel storage and dispensing facilities, chemical manufacturing and storage, car washing facilities, among others. For industrial facilities in continuous operation, the City issues annual storm water discharge permits which specify certain operational requirements and establish discharge criteria for certain water quality parameters. On a priority basis, the COA conducts inspections of the permitted facilities. The annual permits must be renewed on an annual basis by providing the COA with information regarding any changes in the facility, and by paying a renewal fee.

Several of ABIA's Tenants currently hold COA storm water discharge permits. Unless specifically noted otherwise, all ABIA Tenants are responsible for maintaining compliance with their COA storm water discharge permit requirements, in addition to TPDES. COA storm water discharge regulations and permitting requirements can be found via the following website: <http://www.austintexas.gov/department/watershed-protection>

2.3 TPDES PERMITTING AND SWP3 OPTIONS

All ABIA Tenants who are subject to TPDES regulations (see Table 2-1) must obtain their own TPDES GP authorization number. The authorization number is obtained by completing and submitting a Notice of Intent (NOI) form to the TCEQ (Effective September 1, 2017, applicants must submit an NOI or NEC using the online e-permitting system available through the TCEQ Website). The TCEQ will review the NOI and will either confirm acceptance with a notification letter and authorization number, or deny the NOI with explanation. An authorization number provides permit coverage until the permit expires. When the five-year permit expires, a new NOI form must be filed to renew permit coverage for another five-year period.

Prior to the submittal of the NOI, TPDES requires that each applicant develop and implement a SWP3. Under ABIA's GP, however, there are two options regarding preparation of the SWP3:

- Option 1 is to voluntarily participate in this SWP3, as a “co-located industrial facility”. Under this option, “member” Tenants have the benefit of the DOA’s general administration assistance, however, each Tenant retains an equal duty to adhere to all applicable requirements of the SWP3, maintain compliance with all of their operations, and actively participate as a SWP3 “Team” member.
- Option 2 is to independently develop and implement a separate SWP3. Under this Option, in addition to providing the TCEQ with all necessary documents for approval, the Tenant will be required to submit all pertinent information, including their SWP3, to the DOA for approval. Any Tenant-prepared SWP3 must parallel the DOA SWP3 and must address the DOA’s established Policies and Procedures. The Tenant retains all responsibility for administration and implementation of the SWP3, including the formation of their own SWP3 Team.

2.4 PERMIT ENFORCEMENT AND LIABILITIES

According to TPDES regulations, each permittee has a duty to comply with all conditions of the GP. Failure to comply with any permit condition constitutes a violation of the permit and the Texas Water Code (or the Texas Health and Safety Code). Violation of the GP is grounds for enforcement action by the TCEQ, for revocation or suspension of coverage under the GP, and for requiring a permittee to apply for a, individual TPDES permit or coverage under an alternative GP.

As provided by state law, enforcement action may subject the permittee to administrative, civil and criminal penalties, as applicable, for negligently or knowingly violating the Clean Water Act, the Texas Water Code, Chapters 26, 27, and 28, and/or Texas Health and Safety Code, Chapter 361. Any false or materially misleading representation or concealment of information required to be reported by the provisions of the GP or applicable regulation, which avoids or effectively defeats the regulatory purpose of the GP, may subject the permittee to criminal enforcement.

3.0 ABIA PROPERTY AND SETTING DESCRIPTION

The following sections provide a general description of ABIA property and operations.

3.1 PROPERTY LOCATION AND OPERATIONS

ABIA is located on the south side of State Highway 71, bordered on the west by U.S. Highway 183, in southeast Austin, Texas, as shown on Figure 3-1. The airport is situated south of the Colorado River and encompasses approximately 4,200 acres. ABIA is the former location of Bergstrom Air Force Base, which was converted to the current international airport. Air cargo operations began at ABIA in June 1997. ABIA opened to commercial air passenger services in May 1999.

The primary services that are provided by the DOA and ABIA Tenants are as follows:

- Air passenger (airlines),
- Air cargo,
- Ground Service Equipment Maintenance (GSEM),
- Airport, airline and aircraft services and maintenance, (airline catering, fuel, and other),
- General Aviation/ Fixed Base Operations (GA/FBO),
- Government,
- Parking,
- Ground transportation (rental car agencies, shuttles),
- Hotel,
- Military

Approximately 26 percent of ABIA property is impervious, being covered by buildings and paved areas (i.e., runways, taxiways, roadways, buildings and parking lots). Vegetative surfaces comprise the remainder of ABIA facility.

3.2 SETTING

ABIA is located along Onion Creek, on a low terrace above the confluence of the creek and the Colorado River. The site elevation is approximately 452 feet above sea level and slopes typically average 1 to 3 percent (U.S. Department of Agriculture, Soil Conservation Service, 1974).

The area north of the airport consists of tracts of commercial, industrial, residential, agricultural, and undeveloped land. The area south of the airport is primarily riparian with agricultural, residential and public uses scattered further south. Areas east and west of the airport consist of large parcels of agricultural and undeveloped land that continue to be transformed for commercial development.

3.3 SITE GEOLOGY AND HYDROGEOLOGY

ABIA lies in a transition zone for the Colorado River as it emerges from the Texas Hill Country, past the Balcones Escarpment several miles west, toward the lower elevation Blackland Prairies to the East. Surficial soils at the site are Colorado River terrace deposits. These deposits generally consist of clays, silts, sands, and gravels with varying mixtures of each sediment type. The thickness of these terrace deposits generally range from 0 to

approximately 50 feet across the property. The Taylor Formation, a relatively impermeable stratum, outcrops at the northwestern portion of the property and elsewhere underlies the terrace deposits.

The shallowest aquifer at the site occurs in the terrace deposits that overlie the Taylor formation. Locally, the aquifer is used for agricultural purposes. Water quality within the aquifer is generally considered to be good. The usefulness of the aquifer, however, depends on saturated thickness. Saturated thickness of the alluvial aquifer across the property ranges from 0 to approximately 12 feet. At the ABIA facility, the depth to groundwater generally ranges from 10 to 40 feet below ground surface.

3.4 CLIMATOLOGY

The climate is humid subtropical characterized by hot summers and relatively mild winters. Average maximum temperatures reach a high of 96 degrees Fahrenheit in August and a low of 59 degrees Fahrenheit in January (National Oceanic and Atmospheric Administration). Average minimum temperatures range from 74 degrees Fahrenheit in July and August to 39 degrees Fahrenheit in January.

The Austin area receives an average annual precipitation in the form of rainfall of approximately 32.5 inches (National Oceanic and Atmospheric Administration). Rainfall is fairly evenly distributed throughout the year with the greatest average amounts occurring in May (average of 4.78 inches) and June (average of 3.72 inches). On average, January receives the least amount of rainfall with 1.71 inches. The greatest evaporation occurs during the summer months. Wind speeds average 9 miles per hour with prevailing southerly winds.

4.0 ABIA STORM WATER DRAINAGE AND MANAGEMENT SYSTEMS

Both natural and man-made features control storm water flow within ABIA property. The primary features, and how they work to control storm water flow, are described in the following sections.

4.1 DRAINAGE AREAS AND OUTFALLS

The ABIA property comprises 24 different “drainage” areas, as illustrated in Figure 4-1. Within each drainage area, storm water flow is dictated by surface topography, both natural and manmade, and by man-made structural controls (e.g., channels, ponds, pipes, etc.).

As dictated by topography and structural control features, storm water runoff is ultimately directed to “outfalls”. With regard to TPDES, outfalls represent the locations where concentrated flows of storm water discharges:

- into “water in the State” (e.g., Onion Creek),
- into a City- or State-owned storm sewer system (e.g., municipal roads with gutters), or
- off the property.

Based on these outfall criteria, 26 different outfalls have been identified within the ABIA industrial property boundaries (see Figure 4-1).

Because storm water that falls within industrial areas may be exposed to significant materials, the outfalls that are associated with the industrial drainage areas require coverage by the TPDES permit. The industrial outfalls must be monitored in accordance with TPDES requirements. The remaining drainage areas (i.e., non-industrial) and their associated outfalls are not subject to TPDES monitoring as industrial operations are not conducted within these areas.

Table 4-1 identifies which drainage areas include industrial activities and which do not. Of the 24 different drainage areas, 16 are associated with “industrial” activities. TPDES monitoring is therefore conducted at these outfalls, except where specifically excluded. The monitoring requirements are discussed in detail in Section 11 and Appendix C.

4.2 STORM WATER MANAGEMENT SYSTEMS AND STRUCTURAL CONTROLS

ABIA storm water management systems and structural controls are divided into two primary components, “Airside” and “Landside”. Airside refers to all areas where aircraft are operated or serviced. Landside refers to all other areas. The storm water management systems and controls for both areas include graded surfaces, pavements, collection and conveyance structures, Water Quality Pond (WQP) treatment systems, vegetative filters, detention basins, and discharge structures. Maintenance programs for these controls are discussed in Appendix E, ABIA WQP SOPs, ABIA WQP preventative maintenance programs, and COA WQP preventative maintenance programs. The primary drainage conveyance structures and structural controls across ABIA are shown in Figure 4-2.

4.2.1 Typical Water Quality Pond Treatment System Operations

Across ABIA, WQP treatment systems are designed to provide sedimentation, filtration and/or detention of storm water. Table 4-2 provides a list of the WQPs and a summary of information relevant to each. The WQPs are designed and operated typically as described below:

- Storm water runoff enters a sedimentation basin and the velocity of flow slows to allow suspended solids to settle from the storm water. Most of the WQPs have separate sedimentation basins designed specifically for this purpose. However, sedimentation may also occur in a filtration basin or in a detention basin.
- Storm water discharge from a sedimentation basin typically occurs through a rock gabion wall or low velocity under-flow piping into a filtration basin.
- Additional sediments, floating debris and other common contaminants are removed through filtration media composed of sand and fabric materials in the filtration basin.
- Storm water leaving a filtration basin enters buried perforated pipes that typically direct the flow to the downstream conveyance.
- When the volume of storm water captured in the sedimentation and filtration portion of a WQP treatment system reaches its design capacity, additional runoff bypasses that portion of the system and is diverted to a detention basin.
- Detention basins are designed to reduce peak discharge rates that may cause downstream flooding and erosion. Detention basin discharge is controlled by outlet structures sized for allowable release rates that do not exceed pre-development flow conditions for specific design storms.
- Overflow control structures, such as weirs or pipes, are also provided at the detention basin outlets to convey storm events with higher rates of discharge (e.g., 100-year storm).

Two exceptions to the typical operations described above are WPQ-N and WQP-K. These WQPs serve the Cargo and Terminal Apron, respectively. Operations pertaining to these WQPs are discussed in more detail in the Airside Drainage Systems discussion below.

4.2.2 Airside Drainage Systems

The Airside drainage system is designed to meet the Federal Aviation Administration (FAA) 5-year storm event criteria. The system collects runoff from aircraft operating areas: taxiways, runways, aprons and undeveloped land between these areas. Except for times when de/anti-icing chemicals are used (during inclement weather in the winter) taxiways and runways generally have a lower potential for exposure of storm water to pollutants than other industrial areas of the airport.

On the Airside, storm water runoff flows across pavements and/or open vegetative filter areas until it enters grated inlet drainage structures or natural/man made open channels. These features convey the Airside runoff either to WQP treatment systems, or directly to outfalls via vegetative drainage conveyances (e.g., filter strips, ditches, channels, etc.). The vegetative conveyances serve as filtration media for many of the Airside discharges, especially along runways and taxiways where potential sources of pollutants are minimal.

As runoff from the Airside Cargo and Passenger Terminal aprons can be affected by activities such as aircraft fueling, de/anti-icing, and the operations performed by ground support equipment, storm water runoff from these areas is treated differently from other Airside drainage areas. At these aprons, the first one-half inch volume of runoff is directed to special concrete-lined sedimentation/filtration basins. The concrete lining serves to mitigate the potential for contamination of underlying soils and groundwater. Existing Airside concrete-lined sedimentation/filtration basins are WQP-N and WQP-K (Figure 4-2). These WQPs operate as follows:

WQP-N. WQP-N serves the Air Cargo Facility drainage area. There are two sedimentation/filtration basins at WQP-N, one is concrete and poly-lined and the other is not (Landside). Storm water runoff from the Airside Cargo facility is directed to the concrete poly-lined basin by a trench drain and piping system and an open concrete-lined (Airside) channel. This storm water gravity flows to a splitter box that directs the runoff to WQP-N's concrete-lined Airside pond. When the level in the Airside filtration pond reaches a pre-determined depth, sluice gates are automatically closed and the remaining storm water runoff is directed to the WQP-N detention pond. From the detention pond, the storm water is directed to Outfall No. 1.

When anti-/de-icing operations have taken place storm water captured in the filtration pond is visually monitored and chemically analyzed to determine water quality parameters. If chemical analysis indicates chemical oxygen demand (COD) levels above certain criteria, the storm water is directed to the wastewater sewer system pursuant to the DOA's Water and Wastewater Industrial Pre-treatment Permit #719AUS0002331. If chemical analysis does not indicate excessive COD concentrations, the storm water may be discharged to a sand filtration basin which discharges at Outfall No. 1.

The unlined sedimentation/filtration basin at WQP-N receives flows from the south Landside Cargo area and the north Landside Cargo Port Building No. 3 parking lots, roadways, building roofs, and undeveloped and unpaved land. Storm water from these areas is captured by inlets and gravity flows through a series of underground pipes to a splitter box that directs the runoff to the Landside portion of the WQP-N filtration pond. Storm water captured in this basin is filtered and then conveyed to Outfall No. 1. If flows exceed filtration pond capacity, additional flow is conveyed to the WQP-N detention pond and subsequently is discharged to Outfall1.

WQP-K. WQP-K is a tri-basin design – all 3 basins are concrete-lined. WQP-K is dedicated to capture and retain runoff from the Passenger Terminal apron. The dual design and control valves allows runoff capture to be managed between ponds. Storm water captured in WQP-K system can be diverted to the wastewater treatment plant or to K-3 WQP which discharges through filtration media to the downstream conveyance and then to Outfall No. 16. When de-/anti-icing operations have occurred the storm water runoff is retained for chemical analysis prior to discharge, as described above for WQP-N.

4.2.3 Landside Drainage Systems

Drainage systems similar to the Airside features are in place to convey the 25-year storm events for Landside infrastructure. In Landside areas, runoff is collected from building roofs, vehicle parking areas, roads, and landscaped areas. Runoff may enter storm drains where it is conveyed through underground pipes to WQPs. Drainage from each recently developed Landside area is diverted to dedicated WQP treatment systems that operate using similar sedimentation, filtration, and detention methods as described above in Section 4.2.1.

5.0 OPERATOR-SPECIFIC DESCRIPTIONS

The following sections provide DOA- and Tenant-specific information, including descriptions of the industrial operations, potential pollutant sources, Best Management Practices (BMPs), and storm water management systems and controls. The pertinent information has been compiled in DOA and Tenant Summary (Summary) sheets, which are provided in Appendix D. The Summary sheet format has been developed to facilitate the administrative process for future revisions as conditions at specific facilities change.

The descriptions presented in the Summary sheets have been developed based on each Operator's written responses to a DOA questionnaire, in-person interviews, and/or site inspections that were conducted by or on behalf of the DOA. If the operational conditions, pollutant sources, BMPs, or structural controls described or referenced in a Summary sheet change, this SWP3 will be amended with revised Summary sheet(s) for the applicable facility. The revision will be made within 14 days of the change, as discussed further in Section 9.

5.1 OPERATOR-SPECIFIC INDUSTRIAL OPERATIONS

ABIA includes nearly 50 industrial facilities that collectively account for many different industrial operations or support functions. Table 5-1 provides a summary of the industrial activities conducted by the DOA and each of the Tenants. DOA- and Tenant-specific operation descriptions are provided in the individual Summary sheets provided in Appendix D. Figures 5-1 through 5-13 and 5-19 illustrates the drainage system features in the area of the Tenant and DOA facilities. Figures 5-14 through 5-18 illustrate the general areas where primary industrial operations (i.e. fueling, washing, maintenance, de-/anti-icing, and material storage and handling) take place.

5.2 POTENTIAL POLLUTANT SOURCES

Potential pollutant sources include any type of chemicals or other materials and activities that, if exposed, could cause a deleterious impact to the physical or chemical quality of storm water. Typical pollutant sources at airport facilities include materials associated with maintenance, deicing, fueling, and chemical storage operations. Potential sources can also include areas of significant erosion.

Table 5-2 provides a summary of the significant materials used by the DOA and each ABIA Tenant. The use of bulk storage tanks and de-/anti-icing chemicals are summarized separately in Table 5-3 and Table 5-4, respectively. The Summary sheets in Appendix D describe the potential pollutant materials that are used or generated at individual DOA and Tenant facilities. Note that, because the only areas of potentially significant erosion that have been identified are associated with ongoing construction projects, these areas are not shown in a map as potential pollutant sources for the purposes of this SWP3. Potential erosion issues for these areas are addressed on a project-by-project basis in separate Construction SWP3s developed as part of the individual construction projects.

5.3 BEST MANAGEMENT PRACTICES

With regard to TPDES, BMPs represent those actions and procedures that are implemented to prevent or minimize deleterious impacts to storm water quality from industrial operations. The

process an operator must follow for evaluating and selecting specific BMPs for use at a particular site warrants explanation, as provided below.

For purposes of this SWP3, BMPs have been divided into three basic categories:

- **Baseline BMPs** – Baseline BMPs identify practices pertaining to such fundamentals as general housekeeping, employee training, inspection programs, etc. **All Baseline BMPs are applicable to the DOA and all ABIA Tenants, regardless of the nature of operations conducted.**
- **Activity-Specific BMPs** – Activity-Specific BMPs represent a comprehensive list of engineering and operational practices that have been developed for a particular type of industrial operation. For example, a list of BMPs have been identified for the industrial activity “Pavement Washing” and an entirely different list of BMPs have been identified for “Painting”. Depending on site-specific operational characteristics, certain Activity Specific BMPs may not be appropriate for use at certain facilities. It is the duty of the operator to:
 1. identify the activities that are applicable to their operators and,
 2. review the comprehensive list of BMPs and implement those that are appropriate based on site-specific parameters.
- **Treatment Control BMPs** – Treatment Control BMPs relate specifically to certain structural controls in place at the site. In particular, BMPs have been developed herein for the use of WQPs and oil/water separators. The DOA will be responsible for operation and maintenance of all city-owned WQPs. Oil/water separators are operated and maintained by the facility that utilizes them.

As introduced previously, the primary industrial activities conducted at ABIA are summarized in Table 5-1. The Activity-Specific BMPs that have been developed for each of the industrial activities, as well as the Baseline and Treatment Control BMPs, are presented in Appendix E. Where appropriate, each of the BMP descriptions also include a discussion regarding the DOA Policies and Procedures that are applicable to the specific operation. A summary of the DOA- and Tenant-specific industrial activities, and associated BMPs, are provided on the individual Summary sheets in Appendix D. All operators at ABIA will be responsible for implementing the BMPs and Policies and Procedures applicable to their operations. **Representatives from DOA Operations have the responsibility, and authority, to ensure Tenant and DOA compliance with all applicable BMPs and Policies and Procedures in Airside and Landside operational areas, respectively, as described in more detail in Section 8.**

5.4 STRUCTURAL CONTROLS

As described previously in Section 4.0, the ABIA property includes numerous structural control features, such as WQPs, channels, filter strips, etc, that are designed to control storm water across the site. The presence of these features consequently reduces the potential for deleterious impacts to the quality of storm water discharged at outfalls. To a certain degree, the holding capacity of many of the control features (e.g. filtration and detention basins), coupled with the large property size, actually results in a significant reduction in the overall amount of storm water that is discharged from the property, particularly from industrial drainage areas. For certain outfalls, storm events of 1 inch or more are required before flow occurs at an outfall.

The structural control features relating to individual DOA and Tenant facilities at ABIA are described in the individual Summary sheets, and are illustrated in Figures 5-1 through 5-13 and 5-19.

6.0 EVALUATION AND CERTIFICATION FOR NON-ALLOWABLE NON-STORM WATER DISCHARGES

Pursuant to the requirements of TPDES, the DOA has conducted an investigation to identify if any non-allowable non-storm water discharges occur at ABIA. The data used to complete the evaluation were derived through the following tasks:

- DOA and COA file and drawing reviews,
- Tenant questionnaires and in-person inquiries,
- Field visits to each Tenant facility, and
- Dry weather visual inspection of ABIA outfalls.

Based on the information obtained, several routine operations and maintenance activities that represent non-storm water “sources” (e.g. waters from pavement and equipment wash-down, air conditioning condensate, lawn irrigation, etc.) were identified. Once identified, the non-storm water sources were then evaluated to determine if they actually qualify as a *non-allowable non-storm water discharge* in accordance with the criterion set forth in TPDES. The primary factors considered in making this determination were as follows:

- *Is the non-storm water source allowable under TPDES?* TPDES automatically allows discharges of certain on-site non-storm water sources, such as air conditioning and air compressor condensate, potable water sources, irrigation systems, etc. TPDES also allows non-storm water discharges that are conducted under the authorization of other permits. Non-storm water sources that were identified within this category were not determined to be non-allowable pursuant to TPDES.
- *Does the non-storm water source result in an actual discharge?* At ABIA, in order to qualify as a discharge, the non-storm water source must actually reach and exit an outfall. Given this definition, if the on-site non-storm water source occurs in a manner that does not result in a discharge, then it was not considered a non-allowable non-storm water discharge.
- *Is the non-storm water source subject to TPDES regulations?* If the non-storm water source is generated by an entity that is not subject to TPDES regulations based on their SIC code (e.g. rental car companies), then the source was not considered non-allowable under TPDES, even if it does result in an actual discharge at an ABIA outfall.

Each of these evaluation categories, and the activities applicable to each, are discussed in detail in the following sections.

6.1 NON-STORM WATER SOURCES THAT DO NOT RESULT IN A DISCHARGE

For a variety of reasons, certain operations at ABIA involve the use of water and therefore represent a non-storm water source. However, in many cases, the manner in which the water is used does not result in an actual discharge to an ABIA storm water outfall. This is typically due to the relatively small volume of water used during the operations, the large expanse of the ABIA property (i.e. over 4,200 acres), and/or the large holding capacity of the ABIA storm water system components (e.g. WQPs, conveyances, etc.). The non-storm water sources that were identified under this category, but determined not to result in a discharge, are described as follows:

- Approximately quarterly DOA FM or a contractor uses a concentrated soap solution to loosen tire scuff buildup within 3,000 feet of the ends of each runway. After applying the soap solution, a 10,000 psi pressure washer or equivalent method is used with clean water to de-rubberize the runway. The runway is then flooded with several thousand gallons of fresh water after the pressure wash. The water flows to vegetated filter strips alongside the runways where it infiltrates. A study conducted in support of ABIA's Storm Water Drainage Master Plan (May 2011), showed that ABIA's vegetated filter strips near the runways provide a substantial amount of pollutant load removal.
- On a periodic, as-needed basis, the DOA uses water to pressure-wash buildings, public parking areas, and other facility structures. The waters typically flow overland to the HCB and subsequently to WQP-G. The overland flow, and flow through vegetated drainage channels to the HCB, provide a filtering mechanism that serves to attenuate/remove potential contaminants from the water stream. Pressure washing is conducted without the use of chemicals, and is done only to remove non-toxic, non-hazardous materials such as bird droppings, coffee stains, and building grime. If it were to reach an outfall and leave ABIA property, this would be considered an allowable non-storm water discharge.
- ARFF performs an apparatus test of their fire fighting chemicals on a semi-annual basis. They typically spray 75 lbs. of Purple K in a designated area on the backside of the airport property. This area is covered by vegetation and does not have any storm water inlets. Upon completion of testing they saturate the area with fresh water. This activity does not create a discharge or enter the storm sewer system.
- The DOA recently implemented a new practice of removing painted airfield markings per a recent FAA inspection and rule guidance document (FAA Advisory Circular 150/5370). The guidance requires airports to properly prepare the airfield surface for re-painting activities, including removing loose or poorly bonded paint. Paint removal activities involve removing paint with a high pressure spray (hydro-blasting), reclaiming the bulk of the process water, disposing of the reclaimed process water to a permitted sanitary sewer connection or other wastewater disposal method in accordance with local, state and Federal law, and a final high volume potable water flushing of the pavement. The reclamation method is capable of recovering a significant amount of the process water. However, it has been noted that some process water may be flushed into the adjacent vegetative filter strips. As stated above and documented in ABIA's 2011 Storm Water Drainage Master Plan, the vegetated filter strips are capable of providing a substantial amount of pollutant removal.

Based on the relatively low volume of non-storm water generated by the above operations, none of these activities were determined to represent a non-allowable non-storm water discharge. However, because certain sources do result in non-storm water entering ABIA's internal storm water drainage system, the DOA has proactively instituted policies to further reduce the potential for any adverse impact to storm water quality. This is discussed further in Section 6.4.

6.2 NON-STORM WATER SOURCES NOT REGULATED BY TPDES

As discussed in Section 2.0, certain Tenants at the ABIA facility are not regulated by TPDES based on their facility SIC Code. Certain operations conducted by these Tenants, however, do

involve the on-site use or generation of non-storm waters. The identified operations that are not regulated by TPDES are as follows:

- Rental Car Companies. Rental car companies typically soap and scrub wheels outdoors before cars enter automated car washes. Soapy water typically runs off the pavement to vegetated areas or drainage structures. Although not regulated by TPDES, vehicle washing facilities do fall under the COA water quality regulations. According to these regulations, discharges from these washing operations must be directed through grease, oil, and sand traps. These pre-wash activities therefore, must be conducted within the drainage area captured by the facilities' structural controls. This requirement is also consistent with DOA policy.
- Hilton Hotel. The Hilton Hotel pool filter back flush occurs bi-weekly. The process generates a wastewater stream that discharges to a vegetative swale for treatment. This activity does not result in a discharge.

6.3 Allowable Non-Storm Water Discharges

Certain on-site non-storm water sources are allowed to discharge under TPDES. Such discharges may be "automatically" allowed, or allowed pursuant to the authorization of other permits.

TPDES allows several types of on-site non-storm water sources to discharge without any additional authorization required. The following list presents non-storm water sources that have been observed and have the potential to be discharged from any outfall at ABIA:

- discharges from firefighting activities, fire hydrant flushing, and blow down from terminal and parking garage fire suppression systems conducted as routine maintenance activities by ARFF;
- potable water sources (excluding discharges of hyperchlorinated water, unless the water is first dechlorinated and discharges are not expected to adversely affect aquatic life);
- lawn watering and similar irrigation drainage;
- water from the routine external washing of structures, conducted without the use of detergents or other chemicals and where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed);
- water from the routine washing of pavement conducted without the use of detergents or other chemicals and where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed);
- air conditioner and compressor condensates;
- water from foundation or footing drains where flows are not contaminated with pollutants (e.g. process materials, solvents, and other pollutants);
- springs and other uncontaminated ground water; and
- discharges authorized by another permit that are subject to effluent guidelines and specific numeric effluent limitations (currently there are no discharges authorized by another permit).

6.4 NON-ALLOWABLE NON-STORM WATER DISCHARGES

Based on the DOA's investigation of the ABIA facility, as described in the above sections, no actual non-allowable non-storm water discharges were identified to be occurring at ABIA. However, certain activities were identified that resulted in non-storm water being released to internal ABIA storm water drainage system components (e.g., conveyances, WQPs, etc.). As a proactive and conservative measure, the DOA has instituted additional policies, and associated BMPs, to further reduce the potential for adverse impact to storm water quality from these activities. In particular, the DOA has instituted the following policies as a direct result of this evaluation:

- Washing of outdoor pavement where oil and grease might accumulate such as aprons, parking lots and garages, is only allowed where there is a permitted connection for wash water and rinsate to discharge to the waste water system or where wash waters are reclaimed.
- Paved surfaces where leaking aircraft, vehicles and ground support equipment are parked or where outdoor maintenance of the above occurs must be cleaned as appropriate, and power washed on a regular basis.
- Water from routine washing of pavement where detergents or other chemicals are used or where spills or releases have occurred must be reclaimed.

DOA Policies and Procedures and BMPs applicable to all of the industrial activities performed at ABIA are presented in Appendix E.

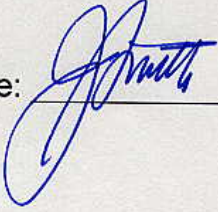
6.5 NON-STORM WATER DISCHARGE EVALUATION CERTIFICATION

As stated above, the DOA has evaluated the ABIA facility for non-allowable non-storm water discharges and determined that such discharges are not occurring. Based on this evaluation the DOA provides the following certification:

The ABIA storm water drainage system has been evaluated for the presence of non-storm water discharges, and the discharge of non-permitted, non-storm water does not occur.

"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 gather and evaluate 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 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."

Printed Name: Jim Smith Title: Executive Director

Signature:  Date: 5-8-02

7.0 WETLANDS ASSESSMENT

In 1992, a wetland assessment was conducted on the former Bergstrom Air Force Base (AFB) property in support of environmental impact analysis activities being conducted at that time in regard to the reuse of the AFB. During that assessment, wetlands were identified, delineated and described, and functional values were evaluated. The results of the assessment were presented in the Wetland Assessment of Bergstrom Air Force Base Report, September, 1992. A site location map and summary table excerpted from the 1992 report is included in Appendix J.

The DOA subsequently commissioned a review and update of the sites that were identified during the 1992 study. The update was conducted on August 17, 2001. A table summarizing the update findings is included in Appendix J.

8.0 SWP3 TEAM AND PERSONNEL TRAINING AND EDUCATION

In accordance with TPDES requirements, a “team” of individuals will retain primary responsibility for the proper administration and implementation of this SWP3. The SWP3 Team structure and responsibilities, and personnel training and education requirements, are described in the following sections.

8.1 SWP3 TEAM STRUCTURE AND RESPONSIBILITIES

The SWP3 Team structure will consist of:

- one DOA SWP3 Program Leader from DOA Planning and Engineering,
- one Field Implementation Team Leaders from Operations,
- one Tenant representative from each ABIA Tenant that is a co-permittee, and

The individuals that have been identified for each of these positions are identified in Table 2-1. The DOA will maintain a current list of the SWP3 Team.

The DOA will retain primary responsibilities for several SWP3 administration and implementation activities, including:

- Maintain a “Master File” of all pertinent SWP3 and related documents.
- Perform quarterly facility compliance inspections of DOA facilities.
- Perform annual facility compliance inspections of TPDES regulated facilities.
- Conduct storm water discharge monitoring (including visual, metals, voluntary benchmark, and annual outfall inspections).
- Coordinate SWP3 Team meetings.
- Conduct annual training of SWP3 Tenant Members.
- Provide regulatory liaison regarding ABIA-wide SWP3 issues.
- Conduct operation and maintenance of all DOA-owned WQP treatment systems.
- Implement BMPs in DOA and common operational areas.
- Update SWP3 as needed.
- Perform de-icing area inspections and track annual usage.
- Maintain industrial waste permit with Austin Water Utility.
- Write annual Comprehensive Site Compliance Inspection Report (CSCIR).
- Certify SWP3 compliance for DOA and common operational areas.
- Provide pertinent regulatory or DOA notification communications to Tenant Members.

It is the SWP3 Program Leader’s duty to ensure the overall SWP3 Program requirements are met and that operations at ABIA are in compliance with TPDES. To this same end, and in support of the Program Leader, it is the responsibility of the Operations Division Field Team Leaders to assess and, as necessary, enforce on a day-to-day basis, DOA and Tenant compliance with all applicable BMPs and DOA Policies and Procedures.

As participants in this SWP3, each TPDES regulated co-located industrial facility has an equal duty to comply with all applicable SWP3 requirements (see Section 2.3). Compliance is required 24 hours per day, seven days per week. It will be the responsibility of the appointed Tenant Member representatives to ensure their facility is in compliance with all applicable SWP3 and TPDES GP permit requirements. **The DOA will not be responsible for administrative or operational compliance at individual Tenant facilities.** At a minimum, each TPDES regulated Tenant Member will be responsible for ensuring their facility complies with the following SWP3 requirements:

- Implement applicable storm water BMPs at Tenant facility and common areas.
- Provide all applicable TCEQ and DOA notifications/communications including NOCs due to personnel and ownership changes.
- Attend SWP3 Team meetings.
- Maintain a current copy of the TPDES General Permit and ABIA SWP3, with all applicable amendments attached. These documents can now be accessed on the Internet so a hard copy at your facility is not necessary.
- Maintain all applicable SWP3 records pertaining to their facility and operation.
- Implement spill prevention and spill response procedures pursuant to ABIA Spill Response Plan.
- Implement applicable DOA Material Storage and Handling Guidelines.
- Perform proper Hazardous Waste Management.
- Implement internal employee training and education programs.
- Identify and implement changes to BMPs, as appropriate.
- Assist the DOA during on-site inspections.
- Maintain a list of all internal SWP3 team members along with a description of each member's roles and responsibilities. This summary will be maintained on-site and provided to the DOA upon request.

The SWP3 Team will meet once per year, at a minimum. The meeting will be conducted by the DOA SWPPP Program Leader. The Team will evaluate the inspection results and the effectiveness of the current BMPs and DOA Policies and Procedures. As appropriate, the Team will identify and implement any needed changes to the SWP3.

The DOA will not certify SWP3 compliance for individual tenant facilities, this is a tenant responsibility

8.2 EMPLOYEE TRAINING

Personnel with day-to-day supervisory authority and those who perform services that involve significant materials (i.e., petroleum hydrocarbons, lav fluids, deicing fluid, etc.) must be aware of storm water pollution prevention management practices, and understand the contents of the SWP3, the GP, and the BMP implementation strategies. Initial and periodic refresher training

of select employees, including SWP3 Team Members, is required to support consistent and effective implementation of this SWP3.

The DOA will conduct an annual SWP3 BMP implementation training seminar for all TPDES regulated tenants.

One representative from each of the above described operations is required to attend the annual meeting. These representatives will then be responsible for training and educating their own internal staff. Training must cover items such as:

- SWP3 applicability, goals, objectives, and requirements.
- proper material management, handling and storage practices for specific chemicals and significant materials.
- spill prevention methods and response.
- the location of materials and equipment necessary for spill clean up.
- spill clean up techniques.
- proper spill reporting procedures.
- familiarization with good housekeeping measures.
- familiarization with DOA storm water and environmental policies and procedures, and
- familiarization with, and implementation of, applicable BMPs.

Training materials may include a storm water training video, photographic slides of BMPs, and/or over-head presentation materials regarding program implementation.

SWP3 training shall be scheduled on an annual basis and records of training activities must be maintained at each TPDES regulated Tenant facility. TPDES Non-regulated Tenants must also provide annual training to employees that perform activities that could contaminate storm water. SWP3 training must also be conducted as a required provision for new Tenant occupancy. Each TPDES regulated Tenant shall provide initial SWP3 training to new hires and annual (at a minimum) refresher training to those employees who will be involved with storm water pollution prevention. Implementation of the training program at each TPDES regulated Tenant's facility, including the participation of each Tenant's personnel, must be documented.

A sample training record form with guidelines for a generic Training Program is included as Form 8-2 in the Forms Section of this SWP3.

8.3 GENERAL SWP3 EDUCATION

All DOA and Tenant employees, regardless of their supervisory authority or involvement in handling or use of significant materials, will be provided general SWP3 education. At a minimum, all employees will be informed of the basic SWP3 goals and will receive an overview of the SWP3 Team member responsibilities and contact numbers.

9.0 TPDES NOTIFICATION AND SWP3 MODIFICATION REQUIREMENTS

In accordance with TPDES permitting requirements, there are several activities that require written notifications and formal modifications of the SWP3. **Tenants are responsible for ensuring that the TCEQ and DOA are notified of changes in ownership, management, facility name, or ceasing operations at ABIA.** The following sections describe the applicable requirements.

9.1 NOTICE OF INTENT

Every ABIA co-located TPDES regulated industrial facility must submit a completed NOI and maintain a TPDES authorization number. NOIs provide basic information including:

- facility name, address, SIC code, responsible party contact, identification of receiving waters.

Non-industrial ABIA Tenants not regulated by TPDES (refer to Table 2-1) are not required to complete or submit NOI forms.

The NOI may be submitted electronically through the State of Texas Environmental Electronic Reporting System (STEERS) or by mail. STEERS can be accessed from the TCEQ's website: <http://tceq.com/>. A copy of the NOI Form is included in the Forms Section of this SWP3. The NOI form may also be downloaded from the "Forms" section of the TCEQ's website (Form #10382). The original forms must be submitted to the TCEQ at the address shown in Section 9.5. Copies of the forms must also be submitted to the addresses shown for the DOA and the COA Watershed Protection Department.

9.2 NOTICE OF CHANGE

Any changes to the information provided in the original NOI will require the submittal of a Notice of Change (NOC) to the TCEQ, with copies to the DOA and COA Watershed Protection Department. Examples of information that may be submitted on an NOC include the following:

- Change in applicant contact or billing information.
- Changes to the General Characteristics section of the NOI.
- Operator name change, provided that only the name has changed and that no transfer of ownership has occurred.

The NOC must be submitted within 14 days of the change. Each Tenant is responsible for preparing and submitting NOCs as necessary. The NOC may be submitted through STEERS or by mail. A copy of the NOC Form is included in the Forms Section of this SWP3. The NOC form may also be downloaded from the "Forms" section of the TCEQ's website (Form #20390).

9.3 NOTICE OF TERMINATION

Termination of a facility's TPDES permit, for any reason, will require the submittal of a Notice of Termination (NOT) to the TCEQ, with copies to the DOA and COA Watershed Protection Department. Reasons for a NOT may include a Tenant vacating the property or a change in ownership. The NOT must be submitted within 10 days of the termination. The NOT may be submitted through STEERS or by mail. A copy of the NOT Form is included in the Forms Section of this SWP3. The NOT form may also be downloaded from the "Forms" section of the TCEQ's website (Form #10443).

9.4 NOTIFICATION REQUIREMENTS FOR CHANGE OF OPERATOR OR OWNER

Permit coverage may not be transferred. When the ownership of a Tenant facility changes, the new operator must submit an NOI at least 10 days before the change in ownership. The previous owner must submit a NOT at least 10 days before the change in ownership.

9.5 NOTICE SUBMITTAL ADDRESSES

Blank NOI, NOC and NOT forms are attached for Tenant use in the Forms Section of this SWP3. When used, the completed forms must be submitted to the following addresses:

TCEQ:
Attention: TCEQ Storm Water and Pretreatment Team
MC-288
PO Box 13087
Austin, TX 78711-3087
(512) 239-4671

City of Austin:
Attention: Storm Water Permits Department
Watershed Protection Department
P.O. Box 1088
Austin, TX 78767

City of Austin Department of Aviation:
Attention: Planning and Engineering
2716 Spirit of Texas Drive
Austin, Texas 78719

9.6 SWP3 MODIFICATIONS

Pursuant to TPDES requirements, this SWP3 must be updated/amended when the following occurs:

- There is a change in:
 - site drainage features or structural controls,
 - the type of significant materials used at a facility,
 - the material handling areas,
 - BMPs, or
 - permit requirements;
- An inspection or spill investigation results in the identification of new BMPs;
- A Reportable Quantity Spill occurs; or
- The TCEQ notifies the DOA that the SWP3 is deficient.

The schedule by which modifications must be made is as follows:

- In the event it is determined that changes to BMPs or structural controls are needed to correct an identified non-compliance or deficiency, the corrections must be implemented before the next storm event, if practical, but not more than 12 weeks after documenting the problem. For deficiencies identified during the annual Comprehensive Site Compliance Inspection, documentation will be considered to occur after the associated evaluation report is completed. After the change has been made, the SWP3 must be modified to reflect the change within 14 days.
- If the TCEQ notifies the DOA that this SWP3 does not meet the minimum requirements of the GP, the DOA must modify the SWP3 as necessary to correct the deficiencies. The modification must be made within 30 days. Upon correction, the DOA will certify in writing to the TCEQ that the changes have been made.
- In the event of a Reportable Quantity (RQ) release, the cause and nature of the release, and the nature of the response, must be documented pursuant to the requirements of the DOA's Spill Response Plan (Appendix F). This documentation must be incorporated into the SWP3 within 14 days of the occurrence.

When required, modifications to the SWP3 can be made in one of three primary ways. The appropriate method for modifying the SWP3 will depend on the nature of the modification. The three primary ways to modify the SWP3 are explained as follows:

1. Replacement pages for discrete portions of text, tables, or figures can be placed directly into the applicable section of the SWP3. The replacement pages should be stamped or otherwise annotated to indicate the date of revision. The old versions should be retained for a period of 3 years, or
2. Standard forms documenting the prescribed changes or modifications can be attached into Appendix L – Modifications, or
3. Changes, including the acquisition of new analytical data, or preparation of new monitoring or inspection reports, and training records can be placed in a separate file that is dedicated to SWP3 documentation.

On a periodic basis, at the discretion of the DOA, the SWP3 document will be formally updated. During the update, modifications that have been made using methods 2 or 3 above, will be incorporated into the body of the document, as appropriate.

10.0 RECORD KEEPING AND REPORTING

Proper record keeping and reporting procedures are TPDES requirements and will be important to the process of demonstrating SWP3 compliance in the event of a TCEQ, COA, or DOA inspection. Record keeping and reporting requirements are discussed in the following sections.

10.1 RECORD KEEPING

Records that will be routinely generated through implementation of the SWP3 will include, among others:

- Regulatory notifications and general correspondence.
- Employee education and training documentation.
- Facility inspection documentation and corrective actions taken.
- Facility quarterly outfall monitoring results.
- Spill records and response actions taken.
- De/anti-icing records.

Each Tenant will be responsible for maintaining all SWP3 records pertinent to their operations. When modifications to the SWP3 are made, copies of the modifications must be incorporated into the records pursuant to the methods described in Section 9.6. The records must be made available to DOA, TCEQ, or COA representatives upon request and must be maintained onsite for a period of three years.

In addition to the Tenant-specific records, the DOA will be responsible for maintaining a Master File which will consist of all SWP3 information for the entire ABIA facility. Whenever pertinent SWP3 information is modified DOA tenants will be able to access the SWP3 via the Internet. If the tenant does not have access to the Internet then the DOA will provide hard copies. Tenants will no longer need to update their hard copies of the SWP3 if they have access to the Internet. Their facility copy of the SWP3 will simply be online. Tenants that do not use the internet to access the SWP3 will have to update the plan according to TPDES regulations. The Internet site is located at http://content.abia.org/environmental/storm_water.html.

10.2 REPORTING

To a large degree, the TPDES program is “self-monitored”. However, there are certain reports that must be generated and submitted to the DOA or governmental agencies. The events that trigger reporting, the reporting requirements, and the entity responsible for the reporting, are described below. **Note that any Tenant who has prepared their own SWP3 must perform all reporting and copy the DOA.**

- ***Numeric Effluent Limitations (NEL) Reporting*** – By December 31st of each calendar year laboratory analyses for metal constituents is performed at each applicable outfall (refer to Section 11 and Appendix C for details regarding NEL monitoring). The results of the NEL monitoring must be documented on a Discharge Monitoring Report (DMR) form (see the Government Agency Forms Section of this SWP3) by March 31st of the following calendar year. **The DOA will be responsible for all NEL reporting.**

- **Exceedance Reporting** - On an annual basis, storm water laboratory analyses are performed for standard permit effluent limitation evaluations. Any exceedance which deviates from ABIA's permitted effluent limitations by more than 40% must be reported in writing to the TCEQ regional office and to the Enforcement Division within 5 working days of becoming aware of the noncompliance. The report must be submitted on a DMR form (see the Government Agency Forms Section of this SWP3). **The DOA will be responsible for all Exceedance Reporting.**
- **Non-Compliance Reporting** - Any non-compliance which may endanger human health or safety, or the environment, must be reported to the TCEQ. A written report shall be provided by the permittee to the TCEQ regional office and to the TCEQ Enforcement Division (MC-224) within 5 working days of becoming aware of the noncompliance. The written report shall contain:
 - a description of the noncompliance and its cause;
 - the potential danger to human health or safety, or the environment;
 - the period of noncompliance, including exact dates and times;
 - if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
 - steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance, and to mitigate its adverse effects.

The DOA will be responsible for all Non-Compliance Reporting.

- **Information Correction Reporting** - When the permittee becomes aware that it either submitted incorrect information or failed to submit any relevant facts in an NOI, NOT, or NOC, or any other report, it shall promptly report the deficiencies to the TCEQ and provide the appropriate facts or information. **The party responsible for submitting the incorrect information will be responsible for Information Correction Reporting.** A copy of all such reporting must be provided to the DOA and COA.
- **Spill Reporting** - Pursuant to the ABIA Spill Response Plan (Appendix F), in general spills greater than 3 gallons or any spilled amount that enters a storm drain, must be reported immediately to DOA (Dispatch at 530-2242 or 530-ABIA). An ABIA Spill Incident Report (SIR) form (Form 10-1) must be submitted to the DOA within 24 hours of becoming aware of the spill. **The Party responsible for the spill will be responsible for ensuring an SIR is submitted to the DOA.** If the spill volume is equal to or greater than the substance RQ, then additional notifications are required pursuant to the specified spill response procedures. A summary of the most recent reportable quantity spills is provided in Appendix I.
- **De-anti-icing Reporting** - Tenants who conduct de/anti-icing operations must maintain daily records of the operations and document the types and amounts of chemicals used on a daily basis. These operations should be summarized on Form 10-2 – "De/anti-icing Chemical Use Record" and submitted to the DOA Planning and Engineering Section within 24 hours. During periods of de/anti-icing operations, the DOA Operations Department will conduct weekly inspections (see Section 12.1) and document the findings on Form 10-3: "De/anti-icing Area Inspection Record". Form 10-3 must be provided to the DOA on a weekly basis. De/anti-icing chemical quantities used in the 2011-2012 winter season are tabulated in Table 10-4.

It is noted that any false or materially misleading representation or concealment of information required to be reported by the provisions of the permit or applicable regulation, which avoids or effectively defeats the regulatory purpose of this general permit, may subject the permittee to criminal enforcement.

10.3 REPORT SIGNATORY REQUIREMENTS

All reports submitted to the TCEQ must be signed by an individual having responsibility for the overall operation of the regulated facility, or activity, or for environmental matters. Persons in positions such as principal executive, facility manager, environmental manager, or positions of equivalent responsibility that have been duly authorized in writing by the principal executive, will qualify.

11.0 STORM WATER DISCHARGE MONITORING PLAN

Pursuant to TPDES requirements, ABIA must implement a storm water quality monitoring program for all outfalls where discharges from upstream industrial operations may contribute to storm water degradation. ABIA first began outfall monitoring in 1999, pursuant to the Federal NPDES permit requirements. Monitoring includes both visual examinations of storm water discharges and laboratory analyses of storm water samples collected from selected outfalls. The pre-TPDES analytical results that have been obtained since first implementing the monitoring program are summarized in Table 11-1.

The Storm Water Monitoring Plan that has been developed and will be implemented at ABIA is presented in detail in Appendix C.

12.0 INSPECTIONS AND COMPREHENSIVE SITE COMPLIANCE INSPECTION

In addition to facility inspections that should be conducted by Tenants as a routine part of their day-to-day operations, there are a variety of formal inspections that are required under the TPDES GP. The inspection protocol that will be implemented at ABIA is described in the following sections.

12.1 WEEKLY INSPECTIONS OF DE/ANTI-ICING OPERATIONS

During de/anti-icing operations, Environmental Affairs Division must conduct weekly inspections. The objective of the inspections is to ensure that the de/anti-icing operations are being conducted in a manner that minimizes potential impacts to storm water. The inspections must include an evaluation that proper BMPs are being implemented by the Tenants, and proper structural controls are in place. The inspections must be conducted throughout the area where de/anti-icing activities are performed. The Airside Operations personnel conducting the weekly inspections must be familiar with the de/anti-icing operations and all applicable SWP3 requirements.

The inspection results must be documented on the De/anti-icing Area Inspection Form (Form 10-3). If the inspection identifies deficiencies or non-compliances, recommendations for corrective measures to prevent recurrences, and a time line for implementing the recommendations, must be developed and included on Form 10-3. The completed form must be provided to the DOA weekly during application periods, as specified in Section 10.2.

12.2 QUARTERLY SWP3 COMPLIANCE INSPECTIONS

The objective of the Quarterly SWP3 Compliance inspections is to evaluate the effectiveness of the facility's overall operational practices with regard to storm water protection. The inspections will include an assessment of the effectiveness of BMPs, DOA Policies and Procedures, spill prevention and response measures, maintenance programs for structural controls, employee training programs, and any erosion control measures in place.

The DOA and each tenant PPT member will be responsible for conducting quarterly SWP3 Compliance inspections. The annual Comprehensive Site Compliance Inspection (CSCI) (see Section 12.3 below) can replace one of the Quarterly inspections required, thus only three Quarterly SWP3 compliance inspections per year may be required.

The DOA or the tenant PPT member will record the inspection results on Form 12-1 "SWP3 Quarterly Inspection Form" provided in the Forms Section. Tenants must fax or email all completed quarterly inspection reports to the Department of Aviation at 512-530-6630 or airportenvironmentalaffairs@austintexas.gov. The form will indicate the general observed effectiveness of BMP implementation and level of compliance with the SWP3, and will identify any operational changes that are necessary to improve effectiveness. A time line for implementing any corrective measures identified will be included on the form. The DOA will communicate the results of the common area and Tenant-specific area inspections to those Tenants impacted by the findings. If deficiencies or non-compliance's are noted, the responsible Tenant will be notified and corrective action will be required. The time allowed to address the identified deficiency will be based upon the level of risk to storm water quality at ABIA. For example, if the deficiency identified is a 1 gallon oil release to the ramp and rain chances are high, the oil must be recovered immediately to protect storm water quality.

12.3 ANNUAL INSPECTIONS

Once per year, a Comprehensive Site Compliance Inspection (CSCI) will be performed. The results of the CSCI will be documented in a Site Compliance Evaluation Report (CSCIR). The CSCI and SCIR requirements are described in more detail in the following sections.

12.3.1 Comprehensive Site Compliance Inspection

The DOA will be responsible for conducting all CSCIs. The objectives of the CSCI are to:

- confirm the accuracy of the descriptions of Tenants facilities, source materials potentially exposed and activities contained in the SWP3,
- determine the effectiveness of the SWP3; and
- assess the implementation and effectiveness of BMPs necessary for mitigation of potential water quality impacts.

The annual CSCI can replace the need a Quarterly inspection, (see section 12.2) if it is conducted during the regularly scheduled period for the Quarterly inspection.

The CSCI evaluation must be conducted by personnel familiar with the industrial activities performed at the facility and all elements of the SWP3. During inspection of their facilities, the Tenant's SWP3 Team Member, or designee, must accompany the DOA inspector(s). The Tenant representative should be prepared to present all documentation pertaining to compliance with the SWP3 during the inspection. The general requirements of the CSCI include:

- inspection of all areas where significant materials are used or stored;
- inspection of all structural controls, including their maintenance and effectiveness;
- inspection of all non-structural controls including BMP effectiveness, good housekeeping measures, and spill prevention;
- Inspection of monitored outfalls for evidence of dry-weather flow;
- inspection of all areas immediately downstream of each industrial storm water outfall;
- evaluation of de/anti-icing procedures and alternative practices; and
- a review of all records (visual monitoring, inspection, spill reporting, training, etc.) required by the SWP3.

For purposes of this inspection, a non-compliance incident is any instance where an element of the SWP3 is either not implemented, or where specific conditions of the permit are not met. Form 12-2: "Annual Comprehensive Site Compliance Inspection Form" is to be used for the CSCI inspection.

12.3.2 Comprehensive Site Compliance Inspection Report

The DOA will prepare a report to document the findings of the CSCI. The CSCI Report (CSCIR) must include a narrative discussion of the permittee's compliance with the current SWP3. The CSCIR must also identify the personnel conducting the evaluation, the dates of the evaluation, and any incidences of non-compliance. If non-compliances are not identified, the CSCIR must contain a certification that the facility is in compliance with the SWP3. The certification form is provided as Form 12-3 in the Forms Section. The DOA will only certify that the DOA facilities

and the airport common use areas are in compliance with the SWP3. The individual tenants will be responsible for certifying their comprehensive SWP3 compliance.

If the CSCIR indicates an incident of non-compliance, the DOA will:

- identify the problem areas;
- provide written notification to the Tenant or operator;
- provide recommendations regarding a course of corrective action and time line to correct the problem;
- schedule a follow-up site visit; If the follow-up visit reveals that no corrective measures have been taken by the Responsible Party (RP) to correct the area of non-compliance, and the RP is unable to produce documentation that corrective measures are in progress, or cannot provide a date by which the non-compliance will be resolved, it will be at the discretion of the DOA to take any or all of the following actions:
 - Write a Memorandum of Record to the Executive Director of Aviation and property management describing specifically the areas of non-compliance and the lack of cooperation by the Tenant.
 - Notify the COA Watershed Protection and Development Review Department and/or the TCEQ.
 - Revoke airport privileges and leases.

Upon completion of the recommended corrective actions, if required, the CSCIR must be updated to contain a certification that the facility is in compliance with the SWP3 at that time. The CSCIR shall either be included as a part of the SWP3, or referenced in the SWP3. The CSCIR is not submitted to the TCEQ, but must be made readily available for inspection and review by TCEQ personnel upon request. Pursuant to SWP3 modification requirements presented in Section 9.6, the SWP3 shall be revised to include and address the findings of the CSCIR within 14 days following completion of the evaluation.

The DOA CSCIR is maintained at 2716 Spirit of Texas Dr., Austin, Texas 78719.