

2021 SWPPP Annual Team/Stakeholder Team Meeting (Call-in) 907-713-2140, 921757#

May 20, 2021 began 10:03, ended 10:35

Participants:

Patty Wahto, JNU Airport Scott Rinkenberger, JNU Airport Phil Adams, JNU Airport
Dan Corson, AK Seaplanes Ken Nichols, DOWL Tom Williams, Ward Air
Holly Salas, Unifi (Delta Air Lines)

Discussion:

- Required annual meeting per Permit (DEC oversees in Alaska for EPA)
- 2020 (5 year plan/permit) JNU SWPPP online: <https://juneau.org/airport/documents-forms>
Environmental Documents <https://juneau.org/airport/documents-forms>
- Monthly, quarterly and annual are listed by year (and quarter) for 2020 (under new permit) and 2021 to-date.
- Note old permit plan is also listed (under June 2019 update)
- Plan and all records (original) are also kept in three 3-ring binders in Airport Manager's Office

Commercial tenants must submit either a Notice of Intent (NOI) for Storm Water Discharge for Industrial Activity under MSGP (multi-sector general permit) even while under the umbrella of the JNU Airport's permit. At this time, JNU is in receipt of the following NOIs (you are given your own permit#):

- Alaska Airlines
- Kalinin Aviation dba AK Seaplanes (application only; no permit on file)

JNU is in receipt of the following No Exposure Certification (Exclusion):

- FedEx
- NorthStar Trekking
- UPS

Any commercial tenant not listed (majority of this airport), we do not have you on file in our master records, please get the applicable form/DEC letter to our office. If you have not filed, you are in violation and subject to fines.

2020 SWPPP Permit:

Know where to find the permit and all reports online. If you get audited by DEC, you will be asked for this information. Tenants are covered under the JNU MSGP umbrella as a co-permittee, but you must still know where to find records AND have either an NOI co-permittee number or No Exposure letter. JNU requires a copy of either of the applications and the response letter from DEC. If people have problems, contact Teri Buck at DEC 907-334-2281. Co-permittees (NOI) and No Exposure tenants will be listed online (was hoping to have more tenants submit/receive letters before posting).

Dan Corson, AK Seaplanes, stated he would look for the DEC letter.

Tom Williams, Ward Air, stated he would follow through on Ward Air's paperwork as well. Mr. Williams wasn't sure if the permit fee was to be paid by them or airport. Airport has the overall permit paid for, but check with DEC Teri Buck for the answer.

NEW SWPPP permit submitted on July 24, 2020, is a 5-year permit that covers JNU and listed commercial tenants under MSGP permit letter for discharge approved by DEC, allowing us to continued discharge monitoring. DEC requirement, but this is an EPA ruling for all business, agencies, etc. discharge....MSGP Section 11: Sector – Specific by Industry Activity, airports fall under subsection Sector S for Air Transportation.

Airport required to file monthly, quarterly and annual testing, assessments and reports. 2020 Annual filed in December 2020. All reports are online with the plan.

Pay attention to maps and discharge flows pertaining to tenant leasehold. Maps will be updated in June/July this year (annual updates) to reflect changes. This is a living document.

Tenants required to report spills to DEC and the Airport! Mandatory!!!

Remind that they must provide training of SWPPP to employees who need to know about it. SEE BMP
Remind about only approved deicing chemicals and sand on the field/airport.

Review of **BEST MANAGEMENT PRACTICES** as outlined in JNU SWPPP program. The following information (excerpts from the MSGP) was summarized/briefed at the meeting (not verbatim):

BMP 4-A Overview

BMPs are measures or controls that JNU must implement wherever the possibility of storm water contamination exists. They may involve implementation of, or changes to, a process, an activity, or a physical structure. BMPs may be procedural (such as training in spill response procedures); structural (such as vegetated swales that serve as retention and treatment areas, or oil/water separators); or administrative (such as record keeping). In general, most BMPs are simple and can be put into practice immediately, but some may require installation of equipment, engineering, and significant capital expenditures. Whether simple or complex, though, effective BMPs can prevent pollutants from being added to storm water.

For the purposes of this SWPPP, BMPs are divided into “baseline BMPs” that are applicable to all industrial activities at the airport, and “advanced BMPs” that are tailored to specific industrial activities. Baseline BMPs include procedures that have already been proven, are relatively simple, and are usually non-structural.

In some situations, where baseline BMPs are not adequate to solve storm water pollution problems, advanced BMPs may be implemented. Advanced BMPs are tailored to address specific needs. They are usually structural and may involve changes in a process, containment and diversion, recycling, material substitution, or treatment. The interconnected grassy swales between the ramps, taxiway, and runway that serve as retention, filtering and treatment areas for storm water runoff are examples of advanced BMPs. Advanced BMPs must conform to, or be consistent with, other facility development and environmental plans before they can be implemented.

This SWPPP identifies BMPs for each identified potential source of pollution, along with a schedule for implementation. BMPs must be reviewed by the pollution prevention team during the annual Comprehensive Site Compliance Inspection. The review evaluates each BMP and determines if it is effective in preventing pollution. If certain BMPs are not effective, they should be replaced with BMPs that are effective.

Co-permittees have the responsibility to implement and comply with the applicable BMPs identified in the SWPPP. Co-permittees are also responsible for ensuring inspections are performed, and records are maintained. JNU is responsible for complying with benchmark monitoring requirements for air transportation activities under Sector S of 2020-MSGP. Benchmark monitoring requirements are described in Section 5-B.4 of this SWPPP. Note, no longer using urea for deicing.

BMPs are categorized according to specific activities (e.g., fueling, vehicle maintenance, and painting). For each activity, applicable BMPs are generally prioritized by their effectiveness in reducing pollution loading in storm water.

REMEMBER IF DISCHARGED – IT ENDS UP SOMEWHERE!

4-A.1 Baseline BMPs

Baseline BMPs are practices that are inexpensive, relatively simple, and applicable to a wide variety of industries and activities. JNU and tenants already have many of these measures in place for product loss prevention, accident and fire prevention, worker health and safety, or to comply with other environmental regulations. The purpose of this section is to highlight how these common practices can be continued, improved, or tailored to prevent storm water pollution.

Baseline BMPs described in the following paragraphs are applicable to all industrial activities at this facility.

Good Housekeeping

Good housekeeping activities and organized workspaces are effective deterrents to accidental spills and leaks of pollutants into storm water drains. The following subparagraphs describe procedures for various kinds of airport activities that promote good housekeeping.

Operation and Maintenance (O&M)

- Maintain clean floors by sweeping as much as possible to prevent carryout.
- Immediately contain spills with sorbents and rags.
- Do not discharge water from washing floors outside or into storm drains.
- Keep the shop and storage areas clean and orderly to prevent accidents and spills.
- Maintain vegetated swales in proper working order.
- Properly dispose of used oil, hydraulic fluids, and transmission fluids, by recycling used oil.
- Properly dispose of waste fuel, antifreeze, spent solvents paint, cleaners, etc. through the CBJ Household and Small Business Hazardous Waste Collection Program.
- Regularly pickup and dispose of garbage and waste material.
- Maintain dry and clean floors and ground surfaces by using brooms, shovels, vacuum cleaners, or cleaning machines.
- Make sure equipment is working properly.
- Routinely inspect for leaks or conditions that could lead to discharges of chemicals or contact of storm water with raw materials, intermediate materials, waste materials, or products.
- Ensure that spill cleanup procedures are understood by employees.
- Properly clean sediment and particulates from catchments, settling basins, and roadways. Washing sediments into storm drains should be avoided.
- Ensure that wash down of equipment at the fire hall is conducted in the bays so the wash down water is routed to the city sewer system. Monthly testing of fire-fighting equipment produces about a gallon of very dilute (97% water 3% film forming foam) that is discharged onto the asphalt and runs off into a sloped grass embankment.

Engine Maintenance and Repair Areas

- Perform engine maintenance and indoors.
- Clean up minor spills using rags, sorbents, or other dry methods.

- Maintain an organized of materials used in the maintenance shop.
- Properly dispose of greasy rags, oil filters, air filters, batteries, spent coolant, and degreasers.
- Track recycling of waste material (i.e., used oil, antifreeze, spent solvents, batteries).
- Drain oil filters before disposal or recycling.
- Store cracked in non-leaking containers.
- Promptly transfer used fluids to the proper container. Do not leave partially-full drip pans or other open containers around the shop.
- Do not pour liquid waste down floor drains, sinks, or outdoor storm drain inlets.

Material Storage Practices

- Keep Material Safety Data Sheet (MSDS) on file for all materials stored and used at the airport.
- Store pavement paint and pavement deicer in covered areas with concrete floors.
- Provide spill catchment and treatment areas around fuel tanks and fuel transfer stations.
- Store containers, drums, and bags away from direct traffic routes to prevent accidental spills.
- Stack containers according to manufacturers' instructions to avoid damaging the containers from improper weight distribution.
- Store containers on pallets or similar devices to prevent corrosion of the containers that can result when containers coming in contact with moisture on the ground.
- Clearly label chemical and/or hazardous waste containers. Hazardous waste labels indicate the contents of the container and appropriate personnel to contact in case of a problem or emergency. Emergency information is posted in areas where hazardous waste is stored.
- Store all flammable materials in identified protected areas away from ignition sources.
- Store stockpiled and containerized materials (fuels, paints, solvents, waste oil, antifreeze, batteries) in protected, secure locations away from drains and plainly label them.
- Provide detention and infiltration areas for runoff from sand storage areas.

Visual Inspections

Periodic visual inspections of catchment drains, outfalls, and vegetated swales help ensure that the systems are free of pollutants and in proper working order. Qualified facility personnel should perform periodic inspections using standardized checklists to ensure that all required areas are inspected. JNU will use the inspection checklists included in this SWPPP. Tenants may develop operation specific checklists.

Examples of potential problems that visual inspections might identify include:

- Oil sheen or other contaminants on or in standing or running water;
- Stains on the ground or unusual discoloration of earth or other surfaces at outfalls/drainage areas;
- Stressed vegetation (e.g., dying trees, patches of dead grass);
- Unclean areas (e.g., storage area in disarray, poor housekeeping); and
- Poorly maintained, corroded, or damaged containers (e.g., drums, tanks).

Spill Prevention

Spills and leaks together can be one of the largest sources of storm water pollutants, and in most cases are avoidable. Establishing standard operating procedures such as safety and spill prevention procedures along with proper employee training can reduce these accidental releases. Avoiding spills and leaks is preferable to cleaning them up after they occur, not only from an environmental standpoint, but also because spills cause increased operating costs and lower productivity. Activities and areas where spills are likely to occur include:

- Fuel loading and unloading areas;

- Storage areas for deicing materials;
- Equipment maintenance activities;
- Dust or particulate generating processes; and
- Waste disposal activities.

Loading and unloading areas, particularly fueling areas, have a high spill potential because the nature of the activity involves transfer of materials from one container to another. The spill potential is affected by the integrity of the container, the form of the chemical being transferred, the design of the transfer area (bermed vs. direct connection to the storm water collection system), the proximity of the transfer area to the storage area, and procedures for loading and unloading. The spill potential from all loading and unloading equipment, as well as storage and vehicle wash areas, will be evaluated during routine inspections.

Storage areas, both indoor and outdoor, are potential spill areas. Outdoor storage areas are exposed to storm water runoff and may provide direct contact between potential pollutants and storm water. Indoor storage areas may contaminate storm water if the drains in the storage area are connected to the storm sewer or if improper clean up procedures in case of a spill are used.

All equipment maintenance areas are potential sources of storm water contamination if the floor drains in these areas are connected to storm sewers (all floor drains at JNU facilities are connected to the CBJ sewer system).

Procedures that reduce the potential for spills will be as follows:

- maximize recycling, reclamation, and/or reuse of process materials to reduce the volume brought into the facility;
- install leak detection devices, overflow controls, and diversion berms;
- adopt effective housekeeping practices;
- adopt a materials flow/plant layout plan (i.e., do not store bags that are easily punctured near high-traffic areas where they may be hit by moving equipment or personnel);
- perform regular visual inspections to identify signs of wear on tanks, drums, containers, storage shelves, and berms and to identify sloppy housekeeping or other clues that could lead to potential spills;
- perform preventive maintenance on storage tanks, valves, pumps, pipes, and other equipment;
- use filling procedures for tanks and other equipment that minimize the risk of spills;
- use material transfer procedures that reduce the chance of leaks or spills;
- substitute less or non-toxic materials for toxic materials; and
- ensure appropriate security.

Spill Response

If a spill does occur, the following procedures can minimize the impact:

- Immediately eliminate the source of the spill, if it is safe to do so, and contain the spill to the extent possible;
- Report the spill to JNU's Operations and Maintenance Superintendent (907) 321-3803;
- If the size of the spill warrants it, ~~JNU's Operations and Maintenance Superintendent~~ Tenant MUST notify ADEC through their emergency response line (465-5340-daytime, 1-800-478-9300-after hours).
- If any of the following criteria are met, the observer or the responsible party will call the marine safety detachment (907) 487-5750 and the JNU's Operations and Maintenance office at (907) 789-4001 or through airport security at 321-3803: **NOTIFY ON ALL SPILLS**

1. If greater than 55 gallons spills including those within secondary containment, (we want to know about ANY spills)
2. If spill is outside secondary containment and is likely to reach water, or
3. Beyond the capabilities on hand to deal with the spill.
 - Maintain a log of spills and corrective measures at JNU's Operations and Maintenance Superintendent's office. (Log should include date, time and location of spill, substance and volume spilled, corrective measures taken and people and responders contacted.) Fill out on line....submit and....
 - Provide copies of spill log to the airport manager.
 - JNU's Operations and Maintenance Superintendent will ensure the responsible tenant cleans up the spill, if appropriate.....or airport will submit a bill for manpower and product used.

Fueling

Fueling procedures that reduce the potential for spills are as follows:

- inspect fueling areas at least annually to ensure BMPs are being implemented; based on inspections, take corrective actions at fueling stations as necessary and maintain a log of corrective action taken;
- provide secondary containment for aboveground storage tanks (ASTs);
- inspect fueling trucks for leaks, repair as necessary, and maintain log of any maintenance performed;
- use automatic shut off valves for fuel pumps or provide personnel to observe fueling activities to ensure overfilling does not occur;
- report all spills to local airfield maintenance superintendent and maintain spill log;
- contain spills with sorbents; dispose of used sorbents appropriately; and
- inspect fueling areas after spills to ensure proper cleanup has been performed.

Vehicle Maintenance

Procedures for minimizing the risk of storm water contamination from maintenance of cars, trucks, heavy equipment, ground support equipment & aircraft are summarized below:

- Permanently plug floor drains that do not flow to sanitary sewer;
- Maximize the use of non-chlorinated solvents over chlorinated solvents;
- Minimize the number of different solvents used;
- Use detergent-based or water-based cleaning agents where possible;
- Centralize cleaning of small parts in parts washers;
- Wipe, brush off, or steam-clean parts before using solvent, to reduce solvent use and extend solvent life;
- Presoak dirty parts in "dirty solvent";
- Use drip pans to collect leaking or dripping fluids and empty drip pans into collection drums promptly;
- Use spigots, pumps, or funnels when dispensing and transferring materials to reduce the possibility of spills;
- Completely drain oil filters and place filters in a sealed bag before disposal or recycling to minimize oil leakage into solid waste receptacles;
- Drain all fluids completely from wrecked vehicles or "parts cars" immediately;
- Store vehicles awaiting repair under cover if possible, or inspect these vehicles to ensure that they do not drip fluids onto the ground;
- Store flammable and corrosive chemicals in suitable storage cabinets;
- Store batteries within secondary containment;
- Never mix waste solvents with any other wastes;
- Segregate waste streams;
- Recycle as available: degreasers, oil and oil filters, antifreeze, cleaning solutions, and batteries;
- Maintain MSDS sheets as required by safety regulations;

- Inspect vehicle maintenance areas to ensure oils, solvents, fuels, and degreasers are not poured into drains; take necessary corrective actions; and maintain a log of corrective measures taken; and
- Sweep floors to maintain cleanliness; wash floors with a minimum amount of water needed so that the water will not be carried to storm drains or outdoors.

Chemical and Hazardous Materials Loading and Unloading

Procedures for minimizing the risk of storm water contamination from hazmat loading and unloading operations are summarized below:

- Water separators at the major outfalls to Jordan and Duck Creek and other locations. In determining the effectiveness of the advanced BMPs, such things as engineering, maintenance, existing water quality, and costs will be evaluated.

Painting

Procedures for minimizing the risk of storm water contamination from painting operations are summarized below:

- Store paints in a heated building to avoid freezing;
- Avoid mixing paints or paint wastes with any other wastes;
- Use latex paints whenever possible because of their less toxic nature, ease of use, and ease of cleanup;
- To the extent possible, perform sandblasting and painting indoors in a well-ventilated area;
- Minimize the number of different solvents used; and
- Collect paint, paint thinner, and solvents separately and dispose of properly.

Storage

Procedures for minimizing the risk of storm water contamination from storage operations are summarized below:

- Store all raw materials, products, and waste indoors, whenever possible;
- Move all unused drums, tanks, and equipment indoors, or send the metal to the local recycler or landfill;
- Store salt and pavement deicer indoors;
- Remove and properly dispose of all drums containing hazardous waste unless they are stored appropriately in compliance with the hazardous waste regulations;
- Store all flammable liquids in flammables cabinets;
- Make sure all containers are clearly labeled;
- Ensure that vehicles stored outdoors do not drip fluids onto the ground; and
- Store snow so that snowmelt drains into vegetated swales or grassy areas as much as possible.

Employee Training

Annual employee training (Chapter 5) should be designed to:

- Familiarize new employees with applicable BMPs and other SWPPP requirements;
- Remind existing employees of applicable BMPs and other SWPPP requirements;
- Introduce new storm water pollution prevention techniques recently incorporated into the plan; provide a forum where new ideas for improving storm water management can be shared.

Education

- Provide information to all tenants on importance of implementing BMPs.
- Provide a copy of relevant BMPs to each tenant.

4-B Advanced BMPs

In addition to the BMPs that are routinely incorporated at JNU, some advanced BMPs are being evaluated to further control potential storm water pollution. This includes an evaluation of the installation of oil water separator

Storm Drain Maintenance

JNU's Operations and Maintenance personnel are responsible for maintenance of the storm drain system.

Tasks include:

- Inspect all storm drains in conjunction with other routine duties and perform necessary maintenance.
- Remove accumulated sediment from bottom of drains as needed.
- Repair any wash out areas to prevent erosion. Maintain vegetation in drainage swales.
- Mow the grassy swales between the runways and taxiways, and ensure that grass clippings or brush are not deposited into flowing water so as to block storm drains and culverts.
- Do not dispose of excess snow removed from runways and taxiways into water bodies.
- If sorbent booms are needed to absorb oil sheen, inspect frequently and replace as needed.
- Use concrete to permanently plug indoor drains not connected to the sanitary sewer;
- Whenever possible, load and unload where spills can be easily contained;
- Contain spills using sorbents and dispose of used sorbents properly; and
- Report all spills to JNU's Operations and Maintenance Superintendent (907) 321-3803..... AND DEC.

Training

ADEC requires annual training for employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of 2020 MSGP. Each operator will provide training covering applicable BMPs, routine facility inspections, quarterly visual assessments, benchmark monitoring, reporting, and recordkeeping.

For JNU, annual Employee training will occur in November (to ensure seasonal employees are included), and will address the following areas:

- Contents of SWPPP;
- Control measures used at JNU (oil water separators, seepage pits, grassy swales);
- Good housekeeping (JNU operations and JNU tenants);
- Locations and use of spill response kits;
- Routine and Annual facility inspections;
- Quarterly visual Assessments;
- Benchmark monitoring
- Reporting and Recordkeeping.

The attachments include a blank "Annual Training Log" which can be used to document training. A separate log may also be used as long as the log is entered into the SWPPP record system. Allowing a separate log simplifies required paperwork because SWPPP training is given to airport staff during annual recurrent training for other purposes.

Each Operator will provide their own training and keep records at their facility for permit compliance. Operators will provide copies of inspection records to JNU staff upon request.

No further questions/comments on the SWPPP at JNU.

PFAS TESTING / MONITORING: Phase 2

Additional wells, testing, monitoring; finding soil and groundwater perimeters at JNU

Retest areas 1 soil and 3 groundwater samples above clean up level (but below human health cleanup)
Test 2 private wells (out of 1500 notifications in the area)

Phil Adams, JNU Airport, confirmed that drilling had begun and two wells remained to be drilled near taxiway

This is a national issue at airports. Monitoring is only the start; mitigation yet to occur once the perimeter of the contamination is found. It would be a couple years yet.

No further questions, discussion or comments.