



Annual Storm Water and Spill Prevention Training

Lafayette Regional Airport (LFT)
Lafayette, Louisiana
December 201



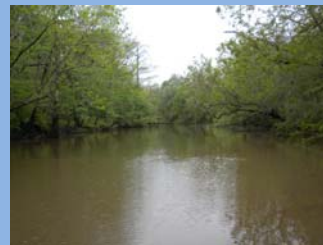
Annual Storm Water and Spill Prevention Training

Lafayette Regional Airport (LFT)
Lafayette, Louisiana
2018

Training Presentation Outline

Storm Water/Wash Water Training

- Airport Water Permits
- Permit Requirements
- SWPPP Components
 - Pollution Prevention Team
 - Pollutant Sources
 - BMPs
 - Authorized Non-storm Water Discharges
 - Inspections
 - Training
 - Record Keeping
- MS4 Permit Requirements for Post Construction Activities
- Group Discussion



Training Presentation Outline

Spill Prevention Training

- SPCC Plan Requirements
 - Inspections
 - Containers
 - Monthly/Annual Inspections
 - Containers Requiring Certified Inspectors
 - Containment Storm Water
 - Plan Review
 - Record Keeping
- Spill Response Measures
- Notification Requirements
- Reportable Quantities
- Training Responsibilities
- Group Discussion



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But First...

While you eat and listen to this presentation:

- Be prepared to pay attention and participate.
- Update your material inventory and deicing information for LFT's records.
- Complete the Annual Tenant Form to assist LFT with their SWPPP update.
- Fill out the SWPPP and SPCC Training Surveys.



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Storm Water Pollution Prevention Training – Airport Permits

- Lafayette Airport Commission (LAC) obtained Louisiana Department of Environmental Quality (LDEQ) permits for the LFT to authorize discharges of:
 - Storm water associated with industrial activity (LAR05M152);
 - Storm water through municipal separate storm sewer system (MS4) outfalls (LAR0401025);
 - Exterior vehicle wash waters (LAG7550655).
- These permits require LFT to prepare a Storm Water Pollution Prevention Plan (SWPPP) and to conduct annual training.



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Storm Water Pollution Prevention Training – SWPPP

- The goal of SWPPP is to minimize the amount of pollutants in storm water discharges.
- The SWPPP requires that LFT:
 - Form an SWPPP team
 - Assess pollutant sources
 - Identify BMPs for facility
 - Implement BMPs
 - Inspect site/evaluate BMPs
 - Evaluate compliance with SWPPP
 - Monitor storm water discharges



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Storm Water Pollution Prevention Training – SWPPP

The LFT SWPPP is maintained on the airport website at:

<http://lftairport.com/environmental-management/>



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Storm Water Pollution Prevention Training – SWPPP Team

Tenant Responsibilities

- Send representatives to annual training;
- Provide training to employees in areas with exposed materials and/or responsibilities for implementing BMPs;
- Implement BMPs;
- Ensure spills/leaks are promptly cleaned up and reported;
- Enforce proper material handling and storage procedures.



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Lafayette Airport Drainage



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Storm Water Pollution Prevention Training – Pollutant Sources

- Aircraft, Ground Vehicle, and Equipment Maintenance and Cleaning Areas
- Airport Deicing/Anti-icing Operations
- Material Storage Areas
- Transformers
- Pesticides, Herbicides, and Fertilizer Application
- Tank Storage Areas
- Fueling Areas



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Storm Water Pollution Prevention Training – BMPs

Good Housekeeping

- Drip pans or absorbents to promptly catch leaks
- Inspect machinery/equipment to minimize leakage
- Implement careful material storage practices
- Properly label drums and tanks
- Store materials and conduct maintenance activities under cover where possible
- Keep work and waste storage areas clean
- Use dry clean up methods



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Storm Water Pollution Prevention Training – BMPs

Preventative Maintenance

- Identify equipment or machinery that may break down, causing spills or leaks
- Adjust, repair, or replace equipment in an appropriate and timely manner
- Keep diked areas surrounding storage tanks free of residual oil or other contaminants



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Storm Water Pollution Prevention

Training – BMPs

Other Pollution Prevention Practices



WARNING
No Chemicals or Paints



Can be drained into these sinks. It is against Lafayette Utilities System Regulations

- Only biodegradable soaps to be used.
- Do not dispose of solvents or any other chemicals down the wash racks, storm drains or sanitary sewer.
- Do not pour anything down the wash racks or storm drains, including mop water, shop vacuum residue or any other waste water.
- Check drip pans regularly to ensure they do not overflow especially before and after rain events.
- Absorbent material must be swept up and properly disposed after use and prior to a rain event.
- Keep all batteries stored inside or covered and in containment.
- Proper solid/hazardous waste disposal. Do not put the following in dumpsters:
 - Oil-based paints
 - Mercury light bulbs/ballasts
 - Used tires



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Storm Water Pollution Prevention Training – Non-Storm Water Discharges

Vehicle/Equipment Washing

- Permit for exterior washing of vehicles, boats, aircraft, and/or heavy equipment.
 - No pressure washing or steam cleaning of engines
 - Only biodegradable soaps
 - Wash only vehicles and equipment that are not leaking fluid/oils
 - Use dry cleaning methods to remove heavy dirt and debris prior to washing
 - Wash rack area should be clean and free of dirt, oils and debris prior to cleaning
 - Submit MSDSs to LAC for the soaps used to clean



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Storm Water Pollution Prevention Training – Non-Storm Water Discharges

Vehicle/Equipment Washing

- Permit for vehicle wash waters allow the airport to discharge wash waters. Unless you have your own permit, **only these six outfalls** can receive wash waters:
 - (Outfall 001A) Located by Hangar 7 (New);
 - (Outfall 001B) Located by Hangar 11 (moved);
 - (Outfall 001C) Located near Surrey Street and the helicopter parking area;
 - (Outfall 001D) Located at LFT's Maintenance Shop;
 - (Outfall 001E) Located at Airport Rescue and Fire Fighting Department (ARFFD); and
 - (Outfall 001F) Located near Gate 7.
- Wash Racks discharge directly to the Vermillion River or Bayou Tortue



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Storm Water Pollution Prevention Training – Non-Storm Water Discharges

Vehicle/Equipment Washing

- Vehicle wash water permit requires that only biodegradable soaps be used at the six wash racks and at the proper dilution.
- LFT must collect samples quarterly for various parameters (oil and grease, suspended solids, chemical oxygen demand, pH, etc.) and report them on discharge monitoring reports (DMRs) to the LDEQ.
- Maintain a weekly sheen log for each wash rack.
- Soap usage, types of soap used, and average number of aircraft/vehicles washed must be tracked for quarterly reporting.
- Oil must never be allowed to be washed or drained into the wash racks or be discharged.



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Storm Water Pollution Prevention Training – Non-Storm Water Discharges

INVENTORY OF DEICING MATERIALS

Name of Company	Storage of Deicer	Amount	Application	Type of Deicer
Delta Global Services	By Terminal Building	6 Totes Max (275 gallons each)	Has a machine to apply deicer	Polar Plus LT 55%, Type I
United Ground Express	By Terminal Building	2 Totes Max (275 gallons each)	Has a machine to apply deicer	Polar Plus LT 55%
FedEx	By Cargo Ramp	5 Totes Max (265 gallons each)	Has a machine to apply deicer	KilFrost DF Plus (88) Dilute, Type I
Envoy	By Gate 10	4 Totes Max (275 gallons each)	Has a machine to apply deicer	Clariant Octaflo Type 1 55% Deicing Fluid Concentrate

Storm Water Pollution Prevention Training – Non-Storm Water Discharges

Deicing Discharges

- If your facility changes the type of deicing material, please let LFT know by submitting a new MSDS to LAC.
- Maintain monthly records of types and quantities of deicing fluid used before dilution and submit these records quarterly to LAC.
- Are you maintaining these records?
- LAC conducts deicing area and outfall inspections monthly during winter months.
- Deicing fluid should not enter the storm drainage system during dry weather deicing.
- Discharges to the storm drainage system should be minimized to the greatest extent possible when wet weather deicing must occur.



Storm Water Pollution Prevention Training – Non-Storm Water Discharges

Deicing Discharges

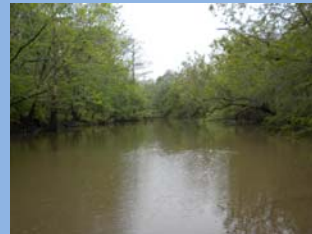
- The MSGP does not authorize dry-weather discharges of deicing fluids.
- The MSGP requires deicing activities only be conducted in designated areas, which are shown in red below.



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Storm Water Pollution Prevention Training – Non-Storm Water Discharges

- Multi-Sector General Permit (MSGP) authorizes storm water associated with industrial activities, including those in the air transportation sector (SIC Codes 4512 - 4581).
- The MSGP also authorizes:
 - Fire Hydrant/System Flushings;
 - Fire Fighting Activities;
 - Foundation/Footing Drainage;
 - Natural Springs;
 - Exterior Building Wash Downs (No Detergents);
 - Irrigation Drainage and Lawn Watering;
 - Uncontaminated Groundwater;
 - Air-Conditioning Condensate; and
 - Potable Water Line Flushings.



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Storm Water Pollution Prevention Training – Inspections

- Weekly visual inspections of wash rack areas
- Monthly deicing outfall and deicing area inspections during the months of December to February
- Quarterly inspections of material storage areas, tank areas, loading/unloading areas, vehicle and equipment storage and maintenance areas
- Quarterly sampling of wash water discharges from wash racks
- Quarterly inspections of storm water outfalls
- Annual evaluation of airport BMPs

These inspections require that Ashley visit your operations to evaluate whether BMPs are being followed and are effective.



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Storm Water Pollution Prevention Training – Training

- All personnel (both LFT personnel and tenants) who work in areas where significant materials are exposed to storm water, or who have SWPPP implementation responsibilities **must be trained.**
- LFT provides annual training to tenant and operator representatives. **It is the responsibility of the tenants and operators** to train its employees that have SWPPP implementation responsibilities.



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Storm Water Pollution Prevention Training – Record Keeping

- Records must be kept for at least three years or one year after permit expires. Records include:
 - Material Inventories (Including Tenants)
 - Discharge Monitoring (including Tenants if applicable)
 - Spill and Leak Records (Including Tenants)
 - Inspections (Including Tenants)
 - Maintenance Records (Including Tenants)



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Storm Water Pollution Prevention Training – MS4 Permit

- MS4 Permit focuses on six minimum control measures:
 - Public education and outreach on storm water impacts;
 - Public involvement and participation;
 - Illicit discharge detection and elimination;
 - Construction site storm water runoff control;
 - Post-construction storm water management in new development and redevelopment; and,
 - Pollution prevention and good housekeeping for municipal operators.
- MS4 Permit requires an annual report to identify progress on fulfillment of the minimum control measures.



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Storm Water Pollution Prevention Training – MS4 Permit

Construction/Post-Construction Controls

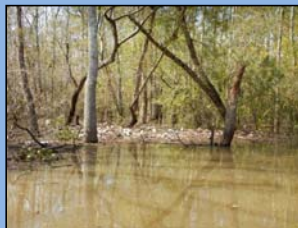
- Include LCG's construction site storm water runoff control ordinances in all construction projects
- Follow LAC construction requirements on projects. They can be found at the following link:
 - <http://lftairport.com/environmental-management/>
- Ensure stabilization occurs on any construction projects
- If you are responsible for maintaining your leased area, conduct inspections to ensure BMPs such as detention ponds are properly maintained and no erosion issues are observed



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Storm Water Pollution Prevention Training – Summary

- LFT has three permits authorizing discharges to the storm water drainage system:
 - MSGP
 - Vehicle Wash Water Permit
 - MS4
- These permits require that steps are taken to prevent pollutants from entering Lafayette receiving streams.
- LFT needs ***your help*** with maintaining permit compliance.



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Storm Water Pollution Prevention Training – Group Discussion

What's wrong with this picture?



Enclosed containment for drums (good control) with faded labels.

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Storm Water Pollution Prevention Training – Group Discussion

What's wrong with this picture?



Staining in maintenance area due to equipment not being provided with spill prevention measures.

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Storm Water Pollution Prevention Training – Group Discussion

What's wrong with this picture?



Debris in the wash rack area and drain.

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SPCC Plan Training – Facilities Covered

Federal Regs

- Facilities where the aboveground storage capacity of **oil** is equal to or greater than 1,320 gallons

State Regs

- Facilities where the aboveground storage capacity of **regulated substances** (e.g. oil, MEK, acetone, toluene, and ethylene glycol) is equal to or greater than 1,320 gallons for two or more containers in a common storage area or equal to or greater than 660 gallons for an individual container

Tenants that meet the volume applicability requirements must develop and maintain their own SPCC Plan.



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SPCC Plan Training – Plan Components

The LFT SPCC Plan is maintained on the airport website at:

<http://lftairport.com/environmental-management/>



- Goal of SPCC Plan is to reduce the potential for oil or hazardous materials being spilled or released to the ground and to receiving streams.

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SPCC Plan Training – Plan Reviews

SPCC Plans must be reviewed and amended as follows:

Federal Regulations

- After single spill >1,000 gal. or multi-spills >42 gal., and EPA requires (amend within 30 days of notice)
- Whenever change in facility materially affects potential for discharge (amend within 6 months)
- At least once every 5 years (amend within 6 months)

State Regulations

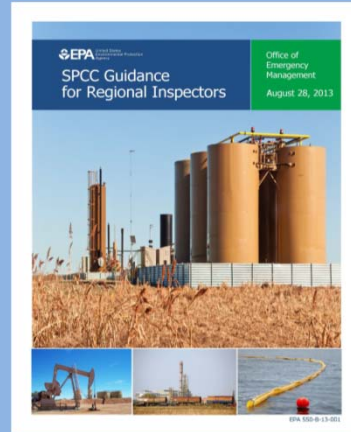
- At LDEQ's request
- Whenever change in facility materially affects potential for discharge (amend prior to or concurrent with change)
- At least once every 5 years (amend within 90 days)



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SPCC Plan Training – Latest Information

- In August 2013, EPA updated the 2005 SPCC Guidance for Regional Inspectors, a summary of EPA’s approach for SPCC regulation implementation.
- <http://www.epa.gov/emergency/docs/oil/spcc/SPCCGuidanceRevisions.pdf>



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SPCC Plan Training –Containers Covered

- **Bulk Storage Containers** - Greater than or equal to 55 gallons capacity for holding oils.
- **Oil-Filled Equipment** - Includes oil storage containers greater than or equal to 55 gallons capacity where oil is present solely to support the function of the equipment (e.g., transformer).
- **Mobile Refuelers** - Bulk storage container, onboard a vehicle or towed, that is designed or used to solely store and transport fuel for transfer into or from an aircraft, motor vehicle, vessel, ground service equipment, or another oil storage container. Must operate exclusively within the confines of a non-transportation facility.



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SPCC Plan Training – Containment

Sized Secondary Containment

- Volume of the largest container within the containment system plus sufficient freeboard to contain precipitation. Required for bulk storage containers.
- If not feasible, must have contingency plan (40 CFR 109), integrity testing of container and appurtenances, and a written commitment of manpower to handle releases.

General Secondary Containment

- Systems in place to prevent releases from leaving site, including curbing, booms/weirs, diversion ponds, response equipment/materials.
- Required for oil-filled equipment and mobile refuelers.



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SPCC Plan Training – Integrity Testing

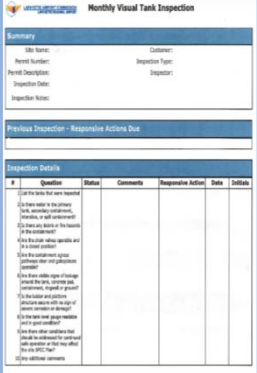
- 40 CFR 112.8(c)(6) requirements for bulk storage containers:
 - Test on a regular schedule and whenever material repairs are made;
 - Frequency of testing must take into account tank size and design; and
 - Must be in accordance with industry standards (STI, API, etc.) and may include visual inspection, hydrostatic, radiographic, ultrasonic, acoustic emissions, or other non-destructive testing techniques.



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SPCC Plan Training – Integrity Testing

- Airport’s inspection program and most likely your own program are based on Steel Tank Institute Standard SP001: Standard for Inspection of Aboveground Storage Tanks.
- Regular inspections are conducted to identify and correct problems before spills/releases occur.
 - Visual inspections are made by operating personnel during daily rounds to observe signs of deterioration, potential leaks, and accumulation of material in containment areas.
 - Formal visual external inspections of tanks are conducted monthly and an annual visual inspection that goes deeper on tanks/equipment.
 - For tanks >5,000 gallons, an inspection by certified tank inspector is required at least once per 20 years.



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SPCC Plan Training – Performing Inspections

- Focus of routine and monthly inspections:
 - Containment integrity (including valve closure status and interstice of double walled tanks)
 - Leak detection
 - Housekeeping evaluation of container transfers
 - Spill kit inventories
 - Container attachments and appurtenances
 - Other conditions that may cause short-term or long-term adverse impacts



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SPCC Plan Training – Annual Inspections

- Annual inspections are to be completed by LAC and applicable tenants;
- Inspection elements are more detailed, including containment condition, foundation and supports, tank shell, valves, leak detection systems, overfill equipment, etc.



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SPCC Plan Training – Containment Drainage Inspections

- Containment dike drainage must be controlled to prevent discharge of oil (dike valves closed).
- Water from containment dikes must be inspected prior to release and should include sheen, smell, turbidity and color.
- Water not suitable for discharge will be collected for off-site disposal. Documentation must be maintained for any discharges from containment areas.



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SPCC Plan Training – Record Keeping

- All inspection records, training records, containment area discharges, and spill history records must be maintained for a minimum of 3 years.



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SPCC Plan Training – Response Measures

- **Safety first – don't take risks!**
- **IF AT ALL POSSIBLE, STOP THE SOURCE OF THE SPILL IMMEDIATELY.** If the fuel is discovered leaking or spilling from fuel servicing equipment or hoses, the emergency fuel shutoff should be operated at once. If the fuel is discovered leaking or spilling from an aircraft at the filler opening, vent line, or tank seams during fueling operations, fueling should be stopped immediately. Evacuation of the aircraft should be ordered when necessary. Approach the incident area from upwind to a point where the spilled material can be identified. If conditions are hazardous (e.g., fire or potential explosion), **DO NOT APPROACH.**
- Mobile fueling equipment and all other mobile equipment should be withdrawn from the area or left as is until the spilled fuel is removed or made safe. **No fixed rule can be made as fire safety varies with circumstances. Shutting down equipment or moving vehicles can provide a source of ignition if no fire immediately results from spillage.** If circumstances dictate that operating internal combustion engine equipment within a spill area that has not ignited should be shut down, engine speeds should be reduced to idle prior to cutting ignition in order to prevent backfire.



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SPCC Plan Training – Response Measures

- **TAKE IMMEDIATE ACTION TO PREVENT THE SPILL FROM REACHING SURFACE WATERS.** Place booms or pads, dig a diversion ditch or ditches, or use soil to build a berm. If the release reaches surface water, attempt to place booms in the water to contain the release or, if necessary, block drainage downstream of the release to prevent further discharge.
- Determine the source, type, and quantity of material spilled.
- LFT has a Spill Response Team – the Airport Rescue and Fire Fighting Department (ARFFD) is specifically trained to respond, contain, and clean up minor volumes of spilled material.
- It is your responsibility to contact ARFFD.



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SPCC Plan Training – Notifications

- After identifying and assessing the hazard, isolate and evacuate the area based on assessment of quantity and threat to life or health:
 - CONTACT SECURITY OR ARFFD IMMEDIATELY:**
 - Security – Number on back of badge - (337) 266-4461
 - ARFFD – (337) 233-1652
 - Call the **ENVIRONMENTAL SITE LEADER:**
 - Ashley Simon, Office (337) 266-4401; Cell (337) 277-5604
- or Alternate listed below:
 - Daniel Elsea, Deputy Director (337) 266-4401



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SPCC Plan Training – Notifications

- The Responsible Party or in their absence the Environmental Site Leader will determine if a non-emergency release is a reportable quantity (RQ).
- LDEQ Office of Secretary updated regulations on state RQs in May 2017. RQs now based on the following:
 - Substances incorporated by reference (40 CFR §117.3, 40 CFR §302.4, 40 CFR §355, 49 40 CFR §172.101) with specified RQs;
 - Petroleum product, produced water, used oil, and oil that is not a petroleum product onto land has an RQ of 1 barrel (42 gallons);
 - For releases of spills or discharges into waters of the state – quantity sufficient to cause a sheen;
 - Flammable liquids or compressed/refrigerated gases in excess of 100 pounds (approximately 13.5 gallons) that leave the site (this for consistency with State Police regulations); and
 - Any chemicals that require MSDS maintenance under OSHA's Hazard Communication Standard has an RQ of 5000 pounds.



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SPCC Plan Training – Notifications

- In the event of an unauthorized discharge that causes an emergency condition the law requires you to make two phone calls as soon as possible within the first hour of the emergency:
 - Call the 24-hour Louisiana Emergency Hazardous Materials Hotline at **(225) 925-6595**; and
 - Call the National Response Center at **(800) 424-8802**.
- In the event on a non-emergency, call the LDEQ Single Point of Contact (SPOC) at **(225) 342-1234**.



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SPCC Plan Training – Training

- All oil-handling personnel must be trained to:
 - Operate and maintain equipment to prevent discharges;
 - Understand discharge response procedures;
 - Discuss applicable laws, rules and regulations on spill prevention; and
 - Review the airport's SPCC Plan and the tenant's SPCC Plan (if existing).
- Tenants must schedule and conduct discharge prevention briefings for their oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges, malfunctioning components, and any recently developed precautionary measures.
- LFT provides annual training to tenant and operator representatives. **It is the responsibility of the tenants and operators** to train its employees that have SPCC implementation responsibilities.

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SPCC Plan Training – Group Discussion

What's wrong with this picture?



Damaged containment wall and leaks in the containment area.

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SPCC Plan Training – Group Discussion

What's wrong with this picture?



Damaged fill drip pan needing repair

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SPCC Plan Training – Group Discussion

What's wrong with this picture?



Leak from fuel nozzle.

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Questions?

(Have you filled all of those forms out yet?)



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We are committed to providing continued support and service to the Lafayette Airport and its tenants. We can be reached by phone or email if you have any questions regarding this information.

Thank you for your time.

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