

1.Opportunities  
2.Challenges  
3.Key Issues

# City of Phoenix Aviation Department

## Multi-Sector General Permit (MSGP) Training



# Training Objectives

This training will:

- Introduce the new MSGP
- Explain MSGP-2010 coverage
- Review changes to the SWPPP
- Provide NOI form assistance



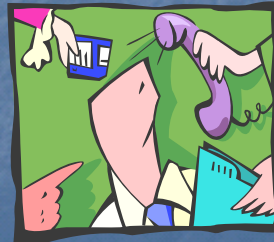
**PLEASE SILENCE YOUR CELL PHONES**

# MSGP-2010 Deadlines

February 1, 2011 – Effective date

May 31, 2011 - Important date

- SWPPP revisions done
- New SWPPP implemented
- NOIs filed with ADEQ

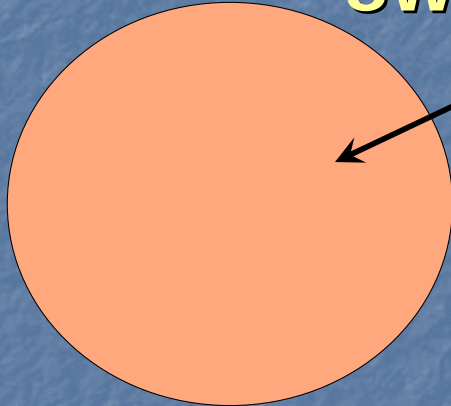


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The Phoenix Aviation Department has a plan in place to get airport operations and all tenants permit coverage within the 120 day timeframe. Activities will include a newsletter announcing that the permit has been issued and providing a schedule of activities related to updating SWPPPs and completing and filing NOIs. These activities will include a training session on completing the NOI form and other assistance provided to the tenants.

# Who must follow the SWPPP?



Everyone  
conducting  
activities exposed  
to stormwater

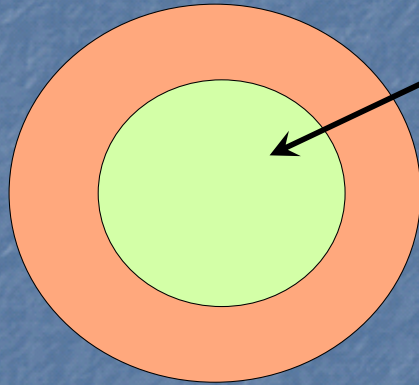
Including tenants and  
businesses operating on-site

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COPAD is responsible for the quality of stormwater leaving the airports. Everyone conducting activities with the potential to discharge pollutants to stormwater must follow the provisions of the SWPPP as a condition of doing business at the City airports.

## Who must file an NOI?



Companies whose businesses include an MSGP-covered SIC code

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Not all activities with the potential to release pollutants to stormwater are conducted by businesses in MSGP-2010 covered industries. If you conduct an activity in the following table then the MSGP-2010 applies to you. Others like airline food service, car rental agencies and shuttle bus operators would be required to follow the SWPPP but would not have to file an NOI.

<b>MSGP SECTOR S COVERED SIC CODES</b>			
4512	Air Transportation Scheduled	45229903	Ambulance Services, Air
45129901	Air Cargo Carrier Scheduled	45810100	Hangars and Other Aircraft Storage Facilities
45129902	Air Passenger Carrier, Scheduled	45810101	Aircraft Storage at Airports
45129903	Helicopter Carrier, Scheduled	45810102	Airport Hangar Rental
4513	Air Courier Services	45810103	Hangar Operation
45220000	Air Transportation, Nonscheduled	45810200	Aircraft Maintenance and Repair Services
45220100	Nonscheduled Charter Services	45810201	Aircraft Cleaning and Janitorial Service
45220101	Air Passenger Carriers, Nonscheduled	45810202	Aircraft Servicing and Repairing
45220102	Flying Charter Service	45810203	Aircraft Upholstery Repair
45220103	Sightseeing Airplane Service	45819901	Air Freight Handling at Airports
45229901	Air Cargo Carriers, Nonscheduled	45819905	Airfreight Loading and Unloading Services
45229902	Air Taxis	45819906	Fixed Base Operator

If you conduct an activity on this list then you are covered by the MSGP-2010. Write the correct code down somewhere as you will need it for completing your NOI.

# MSGP-Covered Entities

Have three options:

1. File Notice of Intent (NOI) for permit coverage with COPAD
2. File an NOI as an individual
3. Complete a No Exposure Certification



Once you're in, you're in.

# 1. COPAD Co-Permittees

## Must:

- Read and implement the revised SWPPP
- Complete an NOI as a COPAD co-permittee
- Submit completed NOI to COPAD by **April 30, 2011**



## 2. Individual Permittees

### Must:

- Prepare and implement a SWPPP at least as strict as COPAD's
- Complete an NOI
- Submit completed NOI to ADEQ by May 31, 2011

## 3. No Exposure

### Must:

- Complete a No Exposure Certification (NEC)
- Submit completed NEC to COPAD by **April 30, 2011**
- Maintain compliance with NEC criteria

## New Requirements

- Pollution Prevention Team (PPT) members must be local
- Signatory authority
- Quarterly routine inspections
- Non-compliances repair deadlines and reporting



Tenant responsibilities include:

- Identify Tenant/Department SWPPP Coordinator (Pollution Prevention Team Member) – PPT members have changed
- Identify the authorized signer for the NOI Application
- Implement SWPPP/BMPs
- Submit Notice of Intent (NOI) as a co-permittee
- Can be more than one person to accommodate HQ contacts, for example.

## **New Requirements** (cont.)

- Track 'regular' maintenance
- Provide annual employee stormwater training records to COPAD
- New categories of control measures

## PPT Member Criteria

- Must be locally available
- Must know local facility policies and operations
- Must have access to the SWPPP
- Must attend annual training and all inspections
- May be a third party



These requirements are in addition to the existing requirements that the PPT members be familiar with facility operations, possess the knowledge and skills to assess conditions and activities that could impact SW quality and be able to evaluate the effectiveness of control measures.

The most potentially significant change is the requirement that PPT members conduct or participate in the routine and annual inspections. The PPTs for some tenants are not based locally. To meet this new requirement, tenants may have to consider changing their PPT member or adding PPT members.

## PPT Members (cont.)

Most importantly,  
each operations PPT member is  
responsible for:

Implementing and maintaining  
all necessary Control Measures  
for their operations

## Signatory Authority

- NOIs must be signed by certain authorized representatives only
- Must delegate signing authority for other permit documents

A handwritten signature in black ink that reads "John Hancock". The signature is written in a cursive style with a large, stylized "H" and a flourish at the end.The logo for the Environmental Council of the States (ECC), consisting of the letters "ECC" in a stylized, lowercase font.The logo for CDM (Ch2M Hill), consisting of the letters "CDM" in a bold, uppercase font.

For corporations, the NOI signatory must be a responsible corporate officer with policy or decision-making authority such as the president, secretary, treasurer, or vice-president of the corporation or the manager of manufacturing, production, or operations provided the manager has authorization to make management decisions, recommend capital investment measures, and the authority to sign documents in accordance with corporate procedures. For partnerships or sole proprietorships, the NOI must be signed by a general partner or the proprietor. **The authorized signer must attend MSGP training.**

For other permit required documents, the authorized signer can delegate signatory authority to another person by name or title. This authorization must be in writing.

## Signatory Authority (cont).

### Corporations:

- Responsible Corporate Officer
- A Manager with:
  - ▶ decision-making authority
  - ▶ power to make capital investment

### Partnerships or Sole Proprietorships

- General partner
- Proprietor



# Quarterly Inspections

- One each calendar quarter
- Annual inspection counts
- At least one during a rain event
- PPT member must participate



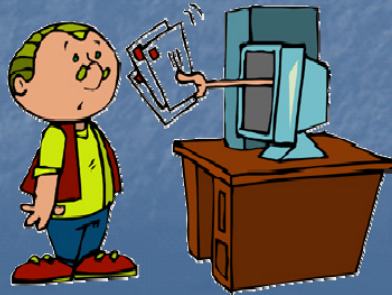
**Was always required but little oversight**

**Monthly inspections are still required during de-icing season for those who do de-icing.**

Inspections must be conducted during normal operations.

## Quarterly Inspections (cont.)

- Conducted by COPAD/Contractor
- Less formal than annual inspection
- Results emailed within 2-3 days



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The scope of the routine inspections will be narrower than the annual inspections and will be focused primarily on control measures. Tenants will be notified in advance of when they MAY be inspected during a week window.

## Quarterly Inspections (cont.)

Less advance notice –

Especially when it's raining!



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Will try to provide notice several days in advance but because of the requirement to conduct one inspection during a rain event, inspectors may need to do inspections on short notice.

Be aware... if rain is predicted and your inspector hasn't conducted at least one inspection during a rain event – you will probably be getting an inspection.

Be sure your contact information is up to date!

# Non-Compliance Responses

Non-functioning/missing Control Measures must be repaired:

- Within 14 days; or
- Before the next rain event



**Whichever is sooner!**

Or notify COPAD of extended repair schedule in writing



The new permit includes new requirements for responding to non-compliances discovered during inspections and for documenting control measure maintenance.

# Non-Compliance Responses

For structural Control Measure repairs:

- Report the date the CM was restored to COPAD in writing



Structural CM repairs would be things discovered during inspections such as missing or inadequate secondary containment. This information is now required to be kept with the SWPPP.

# Regular Maintenance

For regular maintenance of structural Control Measures:

- Report the date and type to COPAD in writing



Regular maintenance would include things like servicing oil/water separators.

# Training Records

Co-permittee training records must be maintained with the SWPPP:

COPAD/ Contractor can pick up records during annual inspection



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COPAD/CDM-EEC looking into providing co-permittee access to the Stormwater Database for the upload of records such as these and to allow review of records.

# New Control Measures



Litter, Garbage and  
Floatable Debris

Dust Generation &  
Tracking of Industrial  
Materials



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Litter, garbage, and floatable debris shall not be discharged to surface waters. Keep exposed areas free of such materials or intercept them before they leave the site. This was originally captured under “good housekeeping” or “garbage collection area maintenance” – so it’s not really a new requirement.

Dust – minimize dust generation and off-site tracking of raw, final, or waste materials.



## Updates to Previous CMs

- 1.10: Added "Post Spill Response Plan in areas where spills are most likely to occur."
- 1.17: Changed from "Outfall Inspections" to "Visual Assessments of Stormwater Discharges"; includes new requirements on visual assessments



**Visual Assessments:** 2 per each winter and summer wet seasons during storm event

-sample in clean/clear glass/plastic container, examine in well-lit area, collect samples within 1<sup>st</sup> 30 min of rain event, document results and maintain documentation

# Updates to Previous CMs (cont.)



## PHOENIX DEER VALLEY AIRPORT Spill Response Plan

### When a spill occurs:

1. **Stop** the source of the spill if it is safe to do so
2. For all spills **regardless of size**, call the Airport Operations Center at 602-869-0977 between 6am-9pm or the Sky Harbor Communications Center at 602-273-3311 between 9pm-6am to relay the following:
  - a. Location of spill
  - b. Material spilled
  - c. Whether the release has been contained
  - d. Approximate size of the spill
  - e. Aircraft and/or equipment involved
  - f. Whether tenant personnel are capable of clean up



## PHOENIX SKY HARBOR INTERNATIONAL AIRPORT Spill Response Plan

### When a spill occurs:

1. **Stop** the source of the spill if it is safe to do so
2. For all spills **regardless of size**, call the Communications Center at 602-273-3311 and relay the following:
  - a. Location of spill
  - b. Material spilled
  - c. Whether the release has been contained
  - d. Approximate size of the spill
  - e. Aircraft and/or equipment involved
  - f. Whether tenant personnel are capable of clean up



## Updates to Previous CMs (cont.)

- CM 5: Changed title from “Outdoor Handling, Storage and Disposal of Waste and Materials” to “Materials Storage Areas”
- 5.1: Added “Maintain current hard copies of MSDS for those chemicals likely to have stormwater exposure.”

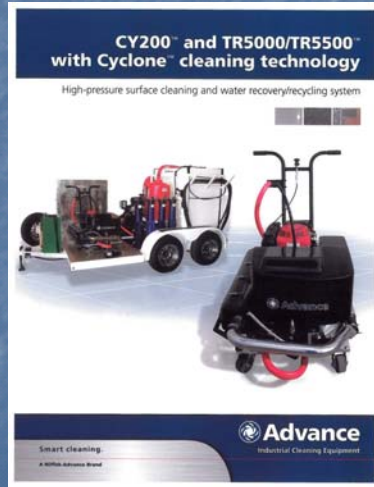


## Updates to Previous CMs (cont.)

- CM 6: Changed title from “Fuel Storage and Delivery” to “Fuel System and Fueling Areas”
- 8.2: Added the use of alternative deicing/anti-icing chemicals and/or practices.



# Updates to Previous CMs (cont.)



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# NOI Workshop

If you brought your own NOI form,  
check the number at the top!



AZMSG2010-002 • AZMSG2010-003

**NOTICE OF INTENT (NOI)**  
for Stormwater Discharges Associated with  
**INDUSTRIAL ACTIVITY**  
under AZPDES 2010 Multi-Sector Permits



# NOI - Part A

Check **NO**

(Even if your facility filed an NOI under MSGP-2000, still check NO)

**A. NOI REVISION** (Follow instructions carefully.)

► Is this NOI a revision for a facility previously filed under the AZPDES 2010 Multi-Sector General Permit?  
 YES  NO If "yes," complete the following:

1. Provide your current authorization #: AZMSG-\_\_\_\_\_
2. Provide the name of the facility listed in Part C.1 and only the specific information being revised.
3. Complete the certification section (Part F) and have this document signed by the authorized signatory.

2010 Authorization #  
(ADEQ Use Only)



## NOI – Part B

- Provide the name of the person who will be the primary contact
- Provide the legal name of the business

### B. FACILITY OPERATOR INFORMATION

▶ Contact Name: \_\_\_\_\_ Phone: \_\_\_\_\_ Ext: \_\_\_\_\_  
▶ E-mail: \_\_\_\_\_ Fax: \_\_\_\_\_  
▶ Operator Business Name: \_\_\_\_\_  
▶ Mailing Address: \_\_\_\_\_  
▶ City: \_\_\_\_\_ State: | \_\_\_\_\_ | Zip Code: \_\_\_\_\_



Provide the name of the person who will serve as the primary contact for the facility – this could be your PPT member.

Provide the legal name of the operator of the facility. The operator is the legal entity that controls the operation of the facility.

Provide the operators address that will be used for all correspondence. The facility address does not need to be the same as the facility address.



## NOI – Part C (#1 and #2)

- Provide the official or legal name of the facility
- Provide the physical address –  
**NOT** a PO Box Number

### C. FACILITY INFORMATION

1. Facility Name: \_\_\_\_\_

2. Facility physical location (include the address, if applicable, otherwise provide directions from the nearest municipality):

▶ Street: \_\_\_\_\_  
\_\_\_\_\_

▶ City: \_\_\_\_\_ State: | \_\_\_\_\_ | Zip Code: \_\_\_\_\_

▶ County: \_\_\_\_\_ Phone: \_\_\_\_\_ Ext: \_\_\_\_\_



1. Provide the facilities official or legal name.
2. Provide the street address, city, state, zip code, and county of the actual physical location of the facility. If the facility does not have an address, provide driving directions from the nearest municipality. DO NOT use a PO Box #.

# NOI – Part C (#3)

## Sky Harbor:

33° 25' 15.06" 112° 01' 07.78"

## Deer Valley:

33° 41' 02.28" 112° 04' 59.11"

## Goodyear:

33° 24' 45.39" 112° 22' 54.65"

3. Provide the latitude and longitude of the outfall (discharge location) of the facility in degrees/minutes/seconds:

Latitude: ° ' . " Longitude: ° ' . "  
(Degrees, minutes, seconds) (Degrees, minutes, seconds)



## NOI – Part C (#4 and #5)

#4 – If you filed an NOI for the original MSGP, check **YES** and complete the first line. Otherwise, check **NO**.

#5 – Check **NO**.

4. Have stormwater discharges from the facility been covered previously under an EPA or AZPDES permit?  YES  NO  
If yes, provide one of the following:

- ▶ The EPA tracking number: AZR05 OR
- ▶ The AZPDES MSGP authorization number: AZMSG- OR
- ▶ The AZPDES Individual Permit number: \_\_\_\_\_

5. Is the facility located on Indian Country land?  YES  NO

- ▶ ▶ If you answered yes, DO NOT submit this NOI to ADEQ. The Department does not have permitting authority on Indian Country land. You must coordinate with the U.S. EPA for permit coverage on Indian Country Land within Arizona..



# NOI – Part C (#4 and #5) (cont.)

Symbol	AirportID	Facility Name	1996	200X
AANG	PHX	Arizona Air National Guard	X	X
ABXA	PHX	ABX Air	X	X
AFC	PHX	Arizona Fueling Facility Corporation (operated by Swissport)	X	X
AGFD	DVT	Arizona Game & Fish Dept.	X	X
AGSI	PHX	ServisAir		X
ALAS	PHX	Alaska Airlines	X	X
AMAL	PHX	American Airlines	X	X
AMFT	PHX	Ameriflight, Inc.	X	X
ATCA	GYR	Airline Training Center Arizona	X	X
CAV	DVT	Cutter Aviation DVT	X	X
CONT	PHX	Continental Airlines	X	X
CUTT	PHX	Cutter Aviation PHX		X
DELT	PHX	Delta Airlines	X	X
DVAF	DVT	Deer Valley Airport Facility	X	X
EMPI	PHX	Empire Airlines	X	X
FEDE	PHX	Federal Express Corporation	X	X
FRON	PHX	Frontier Airlines, Inc.	X	X
GRLK	PHX	Great Lakes	X	
KING	PHX	King Aviation, Inc.	X	X
MAIR	PHX	Mesa Air - Maintenance/Hangar	X	X
NORT	PHX	Northwest Airlines		X
PACI	PHX	Pacific Connection		X
PRES	PHX	Prestige Homes	X	X
PULI	PHX	Pulice Construction, Inc.	X	X
SAMA	PHX	Air Evac Services		X
SAWA	PHX	Swift Aviation Services, Inc.		X
SHAM	PHX	Sky Harbor Airfield Maintenance	X	X
SOUT	PHX	Southwest Airlines	X	X
SUND	PHX	Sun Devil Air Freight, Inc.	X	X
SWIS	PHX	Swissport Fueling		X
TSLI	PHX	Tube Specialties, Inc.		X
UNIT	PHX	United Airlines	X	X
UPSC	PHX	United Parcel Service, Plant Engineering	X	X
USAI	PHX	U.S. Airways	X	X



## NOI – Part C (#6 and #7)

- Sector = **S** (Air Transportation)
- Subsector = **S1** (Air Transportation Facilities)
- SIC Code = between **4512 and 4581**

6. PRIMARY INDUSTRIAL ACTIVITY: Identify the sector, subsector, and 4-digit Standard Industrial Classification (SIC) or Activity Code (AC) that best represents the products produced or services rendered for which your facility is primarily engaged, as defined in the MSGP.

Sector   Subsector   SIC or AC

▶ Area of industrial activity at the primary site that is exposed to stormwater: \_\_\_\_\_ acres

7. CO-LOCATED INDUSTRIAL ACTIVITY: Identify the applicable sector(s), subsector(s) of co-located industrial activity, and 4-digit Standard Industrial Classification (SIC) or Activity Code (AC) for which you are requesting permit coverage.

Sector   Subsector   SIC or AC     ▶ Area of industrial activity exposed to stormwater: \_\_\_\_\_ acre(s)



#6 – provide the Sector, Sub-sector and SIC Codes that best describes the primary industrial activity performed at the facility. Enter the area in acres that is exposed to stormwater.

#7 – if your facility has co-located industrial activities that are not identified as your primary industrial activity, identify the Sector, Sub-Sector, SIC Codes, and area exposed to stormwater.

# NOI – Part C (#8) & D (#1)

C.8. – Check **NO** (For our purposes, there are no inactive or unstaffed)

D.1. PHX – Check **NO**

GYR – Check **YES, Goodyear**

DVT – Check **YES, Phoenix**

8. Is the facility expected to be inactive and unstaffed at any time during the permit term? \_\_\_\_ YES \_\_\_\_ NO

▶ If yes, indicate the estimated starting and ending dates that you expect the facility to be inactive and unstaffed:

From \_\_\_\_\_ to \_\_\_\_\_

## D. DISCHARGE INFORMATION

1. Does the facility discharge stormwater into a Municipal Separate Storm Sewer System (MS4)? \_\_\_\_ YES \_\_\_\_ NO

▶ If yes, name the MS4 operator: \_\_\_\_\_



C8 – Inactive or unstaffed generally refers to unmanned stations such as well sites or temporarily closed mine sites. Check NO

D1 – All facilities discharge to an MS4 somehow. Check Yes. PHX and DVT = City of Phoenix, GYR = City of Goodyear

# NOI – Part D (#2)

2a PHX = **Salt River**

DVT = **Cave Creek**

GYR = **Bullard Wash**

2b and c – **Leave these blank!**

2. Receiving Waters.				
a. List the closest water that receives stormwater directly and/or through an MS4 or other conveyance.	b. Check, as appropriate, if there are any of the discharges within 2.5 miles of any segment of an impaired or outstanding Arizona water (OAW.)	If the facility discharges within 2.5 miles of an impaired water, answer the following <u>three</u> questions		
		c.1. What pollutant(s) are causing the impairment?	c.2. Are the pollutant(s) causing the impairment present in the discharge?	c.3. Has a TMDL been completed for the pollutant(s) causing the impairment?
	<input type="checkbox"/> OAW <input type="checkbox"/> Impaired		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No



## NOI – D (#3)

- If you checked YES on C #4 (i.e., previously filed an NOI), skip this question.
- If you checked NO on C #4 (i.e., have not filed an NOI), check **NO** to 3A and 3B.

3. Water Quality Standards. (\*\*Answer only if the facility has not been covered under the previous EPA or AZPDES permit.\*\*)

a. Are any of the new discharges into any portion of a receiving water designated by ADEQ as an impaired water?

\_\_\_\_ YES \_\_\_\_ NO

b. Has the receiving water(s) been designated as an outstanding Arizona water (OAW)? \_\_\_\_ YES \_\_\_\_ NO





# NOI – Part D (#4)

- A – Check **NO**
- B – Check **NO**

4. Effluent Limitation Guidelines and Sector-Specific Requirements.

a. Are you requesting permit coverage for any stormwater discharges subject to effluent limitation guidelines?  YES  NO

▶ If yes, which effluent limitation guidelines apply to the stormwater discharges? (see page 3)

b. If you are a Sector S (Air Transportation) facility, do you anticipate using more than 100,000 gallons of glycol-based deicing/anti-icing chemicals and/or 100 tons or more of urea on an average annual basis?  YES  NO



# NOI – Part E

1 – Check **YES**

2 – **Lisa Farinas**

3 – ph: **602-273-2782** fax: **602-273-3472**

4 – **lisa.farinas@phoenix.gov**

5 – write **N/A**

## E. STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

1. I confirm that a SWPPP meeting the requirements of the general permit has been developed and will be implemented prior to discharging stormwater from this facility.  YES  NO
2. Name of the person to contact to view the SWPPP: \_\_\_\_\_
3. Telephone number of the SWPPP contact: \_\_\_\_\_ Ext: \_\_\_\_\_ Fax: \_\_\_\_\_
4. E-mail: \_\_\_\_\_
5. If the facility is located within 2.5 miles of an OAW or impaired water, have you enclosed a copy of the SWPPP with this NOI?  
 YES  NO



# NOI – Part F

- Authorized signer must complete and sign

## F. CERTIFICATION

*I certify under penalty of law that I have met the eligibility conditions of this permit and 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, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.*

Print Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Business Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

E-Mail: \_\_\_\_\_ Phone: \_\_\_\_\_ Ext: \_\_\_\_\_



## NOI – What Now?

If NOI is incomplete,  
Send completed forms to:

Ms. Lisa Spahr  
7878 N. 16<sup>th</sup> St, Suite 140  
Phoenix, AZ 85020

**Forms must be received  
by April 30!**



# Questions?



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