

## Permit Information

Report Year: 2019NPDES ID: IDR050007

## Facility Information

Facility Name: CALDWELL INDUSTRIAL AIRPORT

## Facility Point of Contact

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## Facility Mailing Address

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City: CALDWELLZIP/Postal Code: 83606State: IDCounty or Similar Division: CANYON

## General Findings

Provide a summary of your past year's routine facility inspection documentation (see Part 3.1.2 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.8.1 effluent limitation through the use of non-urea-containing deicers, provide a statement certifying that you do not use pavement deicers containing urea (e.g., "Urea was not used at [name of airport] for pavement deicing in the past year and will also not be used in 2015." (Note: Operators of airport facilities that are complying with Part 8.S.8.1 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)

In past years, City stormwater staff have performed quarterly visual assessments at sampling events/outfalls and an annual facility inspection. A daily (undocumented) visual inspection is performed by the Airport Manager. In late October 2019, the Caldwell Industrial Airport received a Compliance Inspection performed by Idaho DEQ on behalf of Region 10 EPA. We learned that our previous inspection approach was deemed by DEQ to be insufficient to meet the requirements of the MSGP. We had a great deal of effluent violations which were due to clerical miss-entry into NetDMR. Idaho DEQ allowed us to correct those. We have seen seasonally cyclical phosphorus exceedances at one outfall, but suspect influence by seasonally high groundwater. At the same outfall we see some TSS exceedances, even though most of the tributary area is paved. We suspect that additional stabilization may be necessary in a small unpaved parking area. In addition, other exceedances have been caused by uncertainty associated with sampling from BMP's which have wildlife activity and intercept groundwater. Starting Q4 of 2019 we began to perform facility inspections quarterly. Our facility inspection included a view of infrastructure condition, but it also echoed many of the recommendations provided by DEQ at the compliance inspection – secondary containment of port-o-pottys, pet waste cleanup, stabilization or reconfiguration of small pond BMPs, onsite spill kits for refueling activities, and construction site BMP's when necessary.

At the information given by Caldwell's current Airport Manager, I certify that Caldwell Municipal Airport is in compliance with the effluent limitation guideline for airfield pavement deicing by not using airfield pavement deicers that contain urea. In fact, Caldwell Municipal Airport does not use deicers. Snow and/or ice is manually removed using heavy equipment such as a dozer or street sweeper.

Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).

At each eligible storm event where stormwater is sampled, the samples are visually inspected and recorded (Date, Time, Sample location, Sampler Names, Temperature\*, presence of flow, etc.). In addition, the sampling location (outfall) is photographed with a time and date stamp. If sufficient flow is available, a sample will be collected in a sterile bottle for analysis. The samples are cooled and transported to Analytical Laboratories in Boise, Idaho which is approximately 30 minutes from Caldwell. The samples are analyzed for total suspended solids, total phosphorus, and e-coli. About 30 days later, the City of Caldwell receives a laboratory report showing the concentration of each of the abovementioned contaminants. This lab report is saved with the photo documentation for future submittal.

\*Procedure for measurement of sample temperature was required to be revised starting 11/1/2019. Temperature must be measured at the time and site of sampling, not at the receiving laboratory.

For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of your control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.

Thus far, none of the outfalls have reached the four-sample exceedance, but we would like to use this opportunity to address some of the effluent violations presented at our October 2019 Compliance Inspection.

AP-04: Three TSS exceedances and three e-Coli exceedances. AP-04 is a surface-level stormwater swale which intercepts groundwater. It frequently discharges, even when no storm event has occurred. Seasonally, it is a site for heavy bird activity. Inlet pipe flow to the pond can exceed TSS limits. Outlet pipe flow tends to receive e-Coli exceedances. Though it is representative of the concentration discharging, Idaho DEQ pointed out that sampling from the outlet is not representative of the stormwater quality due to dilution by groundwater.

AP-06: One Phosphorus exceedance and one e-Coli exceedance. AP-06 is not sampled as frequently as AP-04 because it is substantially identical, but also it is not as accessible during heavy rain. Much like AP-04, AP-06 frequently discharges, even when no storm event has occurred. Seasonally, it is also a site for heavy bird activity.

AP-07: Three TSS exceedances and two Phosphorus exceedances. AP-07 discharges quite frequently—nearly each time that we have a measurable storm event. We are still attempting to troubleshoot the intermittent causes of excess TSS and phosphorus. Half of the airplane tie-down area (outdoor tethered parking) and one fueling area are tributary to this outfall. Based on a review of aerial imagery, TSS may be elevated due to soil track-out from small (2,000 sq. ft.) unpaved parking area nearby. We also noticed two phosphorus violations, one year apart. We are unsure of the cause of this and plan to add focus to this area in future facility inspections. We do not think the excess phosphorus is caused by the refueling activity. Rather, due to the cyclical nature of the occurrence, we suspect that the outfall may be influenced by elevated phosphorus in seasonal high groundwater.

AP-08: One TSS exceedance and one e-Coli exceedance. Our sampling personnel have only ever seen this outfall run water one time – the time it was sampled. We believe that the sample in 2017 was co-mingled with agricultural flow, in order to discharge a quantity sufficient for collection.

Provide a summary of your past year's corrective action documentation (See Part 4.4 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

Corrective actions at Caldwell Industrial Airport have historically been minimal because pollutant sources are comparatively low. This airport is a local hub for small flights only (ie helicopters and low occupancy airplanes). At some of the stormwater sampling locations, stormwater can be comingled with groundwater and/or irrigation water. Because agricultural practices are not subject to water quality regulations, the irrigation water is already visibly dirty (high turbidity and likely high nutrients). Locations where the stormwater is able to daylight and comeingle with groundwater are an attraction for local birds, which naturally increase e-coli and nutrient levels. At times, locations where the water becomes co-mingled produce excessive or low concentration of contaminants. Again, our Compliance Inspection in October 2019 informed us of the need for corrective action in the following areas: possible secondary containment of port-o-pottys, stabilization or reconfiguration of small pond BMPs, and onsite spill kits for refueling activities. We have also been advised to comprehensively re-draft our Caldwell Industrial Airport SWPPP, an endeavor which will begin in 2020.

#### Certification Information

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 submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than 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.

**Certified By:** Robb MacDonald

**Certifier Title:** City Engineer

**Certifier Email:** rmacdonald@cityofcaldwell.org

**Certified On:** 01/07/2020 4:00 PM ET