

Tenant Pollution Prevention Plan (PPP)

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1 Introduction

The St. Louis County Phase II Stormwater Management Plan (SWMP) addresses the need to improve area water quality by preventing harmful pollutants from being carried by storm water runoff into local water bodies. The Metropolitan St. Louis Sewer District (MSD) partners with 59 municipalities (co-permittees) to comply with storm water permit requirements for the St. Louis Metropolitan Small Municipal Separate Storm Sewer System (MS4).

The St. Louis County Phase II SWMP includes Best Management Practices (BMPs) that address potential sources of pollutants in storm water as required by the federal and state regulations. The implementation of BMPs in the SWMP will satisfy the six minimum control measures (MCMs) required by the Phase II Regulations:

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The Spirit of St. Louis Airport has established a Stormwater Pollution Prevention Plan (SWPPP) to comply with these federal, state, and local regulations. Additionally, the Airport has developed this Pollution Prevention Plan (PPP), which will be used by airport tenants and operators as a guidance document to develop their own PPPs. It contains information that will help the tenants to comply with environmental regulations and airport policies.

2 Airport Information

The Spirit of St. Louis Airport is a designated reliever for St. Louis-Lambert International Airport. The Spirit of St. Louis Airport is located on the western boundary of St. Louis County within the Chesterfield Valley, south of I-64/Highway 40 and east of the Missouri River. More specifically, the Airport is adjacent to the south side of Olive Street Road and Chesterfield Airport Road, bounded on the west side by Eatherton Road, and north of the formerly named Chicago Rock Island and Pacific Railroad, currently Missouri Central Railroad.

2.1 Drainage Systems

The Spirit of St. Louis Airport has a drainage area of approximately 1,350 acres. The drainage area is located within a 500 yr levee protected area of roughly 4,300 acres between the Missouri River flood plain and Bonhomme Creek. Bonhomme Creek discharges into the Missouri River at the east end of the Chesterfield Valley.

The entire drainage area is relatively flat consisting mainly of interior ditches. The conveyance system on the Airport is designed to handle the 500 year, 24 hour rainfall

event.

2.2 Bonhomme Creek

Bonhomme Creek receives all storm water runoff from the Airport's 1,350 acre drainage area known as Watersheds 2 and 7. Storm water is collected from the currently undeveloped farmed areas north and west of the Airport in a series of open ditches. The industrial park drainage sheet flows from the north, collects in a series of catch basins and culverts under Edison Avenue and travels south, collecting additional industrial park drainage before entering the main ditches, joining with the agricultural runoff. All storm water on the Airport reaches main ditches on the south and east property lines where it enters a main transmission ditch leaving Airport property. Storm water in this main drainage ditch flows east to and under Long Road. At this location, storm water is pumped over the levee via three 20,000 gallon per minute pumps maintained by the Monarch-Chesterfield Levee District.

2.3 NPDES

Federal regulations governing storm water discharges require that transportation facilities consisting of leaseholds which have discharges from vehicle maintenance shops, equipment cleaning operations, or aircraft deicing which are defined as "associated with industry activity" be covered under an NPDES permit.

Currently the Airport is operating under general operating permit MO-R80F016 and land disturbance permit MOR 103441. The general operating permit encompasses all storm water discharge from the Airport, leaseholds, and private industry contiguous with Airport property. The land disturbance permit covers continuous construction and land disturbance activities throughout the Airport's properties.

3 Non-Structural Controls

Non-structural control mechanisms aimed at pollution prevention can be divided into two categories, good housekeeping practices and Best Management Practices (BMPs). Good housekeeping measures are steps generally taken by workers on a daily basis during the course of normal work day activities to reduce exposure of garbage and refuse to precipitation and runoff and to generally keep areas that may contribute pollutants clean and orderly. Best management practices (BMPs) are measures used to prevent or reduce pollution from on-site operations entering the storm water system.

3.1 Good Housekeeping Practices

The purpose of good housekeeping practices is to maintain clean and orderly facilities in order to reduce the potential for contamination in storm water runoff. Good housekeeping practices are simple and inexpensive to implement. The key to good housekeeping practices is being attentive to the environment and taking responsibility

to correct anything that is out of order. Examples of good housekeeping practices include the following:

- Maintenance shops and aircraft ramp areas are checked daily and minor spills are cleaned immediately and disposed of in an approved manner.
- Discarded shipping materials are either recycled or disposed in dumpsters, which are emptied weekly.
- Walkways, aisles, roadways and exits are to be kept clear at all times.
- All refuse is to be placed or disposed in an appropriate container.
- Material and products are stored in a neat and orderly fashion with particular attention not to block walkways or access routes.
- Chemical containers are to be stored in enclosed or covered areas whenever possible to minimize contact with storm water.
- All chemical storage containers are to be properly labeled.
- Empty drums are to be placed only in their designated area and labeled as empty.
- Chemical containers and/or drums are to be kept closed at all times when not in use.
- Inside floors are to be kept clear of debris and spills and are to be swept or mopped regularly.
- Tools and equipment are to be kept clean and neatly stored when not in use.

3.2 Best Management Practices

Best Management Practices (BMPs) are methods or techniques that have been proven to be the most effective and practical means of achieving an objective. For the purpose of the Pollution Prevention Plan, these are the best methods of preventing pollution from entering the storm water runoff.

Attached is a BMP guidance document that includes practices that should be incorporated into the organization's daily practices and operations. Examples of BMP that can be found in this document include:

- Elimination of Non-Allowable Discharges
- Aircraft, Vehicle, and Equipment Maintenance
- Aircraft, Vehicle, and Equipment Fueling
- Aircraft, Vehicle, and Equipment Washing
- Aircraft Deicing/Anti-Icing
- Exterior Chemical and Material Handling and Storage
- Solid Waste and Garbage Disposal
- Buildings and Ground Cleaning Operations
- Spill Response and Clean-up
- Preventative Maintenance of Structural Controls

4 Structural Controls

Structural controls can be defined as the physical features incorporated into the construction of a facility which are designed to reduce or eliminate environmental pollution of a specific collection system or increase safety. Structural controls are implemented when non-structural controls are insufficient to prevent contamination from reaching the storm water runoff.

Common structural controls impacting airport tenants include:

- Oil/Water Separators
- Grease/Sand Traps
- Fire Suppression Systems
- Stormceptors and Drain filters (or similar systems designed to treat storm water runoff)
- Diversion valves and shut-off valves
- Secondary containment structures
- Storm water retention and spill containment ponds

4.1 Preventative Maintenance Programs

The purpose of preventative maintenance programs is to reduce the possibility of storm water contamination by preventing spills before they occur. This is accomplished through routine inspection, testing, and maintenance of all equipment, including tanks, drums, and containers, and other facility operations. The preventative maintenance program should include the following:

- Identify equipment, systems, and areas that should be inspected and establish an appropriate inspection and maintenance schedule to ensure effective operation
- Have qualified personnel to conduct periodic inspections of equipment, systems, and areas
- Conduct timely adjustment, repair, or replacement of equipment
- Maintain adequate documentation on all inspections and equipment/system repairs or adjustments

Airport tenants and operators of facilities with structural controls specific to the constructed facility are responsible for the upkeep and maintenance of those systems. Additionally, airport tenants and operators of facilities are responsible for maintaining records of all inspections and preventative maintenance activities. These records should be available at any time for review by the Airport staff.

5 Spill Response and Reporting

The establishment of standard operating procedures for safety, spill prevention, and proper employee training can reduce spills and leaks. In the event a spill occurs, a swiftly executed response may prevent storm water contamination and reduce incurred costs from extensive clean-up operations. Activities and areas where spills are likely to occur on the Airport are listed

below:

- Fuel dispensing and bulk transfer areas including vehicle and aircraft fueling (and sites with USTs and ASTs)
- Vehicle and equipment maintenance or staging areas
- Chemical storage areas
- Loading/Unloading areas
- Aircraft maintenance
- Material storage areas
- Deicing areas at taxiways, ramps, runways, and hangars
- Terminal aircraft aprons

5.1 Spill Notification

In the event of a spill, the following procedures should be followed:

- Tenants are responsible for spills that occur on their property
- Tenants must follow procedures in their own Pollution Prevention Plan
- For spills greater than 42 gallons, report the spill to the Missouri Department of Natural Resources Spill Line at (573) 634-2436
- If you are unsure that a spill needs to be reported, contact the Airport Engineer

5.2 Spill Clean-up

- The employees on duty must be trained to attempt to stop the continuation of the discharge – i.e. closing valves, turning off pumps, or isolating a line leak
- Airport personnel shall assist with spills of less than 100 gallons at the airport
- For spills over 100 gallons, an Environmental Remediation Contractor will be called in to assist in the cleanup
- If the spill is volatile, control sources of ignition and vent the area
- Cover or berm storm drain inlets to prevent the discharge of spilled materials to the storm system
- Use berms or booms to contain the spill
- Apply sorbent materials to the spill as necessary
 - Start from the outside and circle inward in order to prevent splashing and spreading

5.3 Spill Prevention and Response Training

Spill prevention and response training for the PPP should include all employees involved in industrial activities, not just those employees on the spill response team.

Training should encompass the following:

- Familiarization with the chemical and physical properties, and the hazards associated with the chemicals handled most frequently;

- Familiarization with designated locations of onsite Material Safety Data Sheet (MSDS) Stations;
- Teaching proper material handling procedures, storage requirements, and ways to prevent spills (e.g. the importance of secondary containment);
- Identification of potential spill areas and the associated sanitary and storm sewer system drainage routes;
- Internal spill notification procedures and Airport notification procedures (e.g., employees should be assured that they will face no reprisals when they report such incidences); and
- Proper clean-up procedures (e.g. employees should be trained on where spill clean-up material are stored, how clean-up materials are applied and disposed).

6 Airport Contacts

Tenant activities have the potential to impact various departments and programs at the Airport; therefore, it is imperative that tenants have a direct contact for each individual area. The following list identifies the individuals or departments responsible for maintaining areas most commonly impacting airport tenants.

Responsibility	Contact	Telephone
Airport Director	John Bales	(314) 568-0581
Airport Engineer	Robert Heine	(314) 220-2189
Airport Operations Manager	Dave Schubert	(314) 568-0584
Maintenance Manager	Jim Marshall	(314) 393-0313
Maintenance Foreman	Jim Smithey	(314) 568-0579
Maintenance Lead	Steve Sindel	(314) 568-0579
Missouri DNR Spill Line		(573) 634-2436
National Response Center (NRC)		(800) 424-8802

7 Pollution Prevention Plan Questionnaire

The following section details the information that must be incorporated into each tenant's onsite PPP Manual. As previously stated, the purpose of the PPP is to ensure airport tenants are familiar with airport policies, environmental regulations, and the various onsite housekeeping practices and BMPs that will be implemented throughout occupancy at the Airport. Areas that must be addressed in all PPP Manuals include:

- Company Profile
- Onsite Environmental Contact
- A Facility Map
- Regulatory Requirements
- Major Chemical and Material Handling or Usage
- Material Safety Data Sheets accessible for on-site chemicals
- Good Housekeeping Practices and BMPs to be Implemented
- Onsite Structural Controls and Preventive Maintenance Program
- Employee Training Program

Airport tenants have the option of creating their own PPP which satisfies all of the areas listed above, or tenants can use the Airport's PPP template. Tenants who choose to utilize the Airport's template will customize the plan by incorporating their relevant company's aspects and the various environmental practices that will be implemented throughout occupancy at the Airport. If tenants have similar plans in place which include the areas listed above (i.e. a Spill Prevention, Control, and Countermeasure (SPCC) Plan), then that document may be submitted in place of the PPP.