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**NEW MEXICO**  
**ENVIRONMENT DEPARTMENT**  
***Surface Water Quality Bureau***

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**DAVE MARTIN**  
Secretary

**RAJ SOLOMON, P.E.**  
Deputy Secretary

**Certified Mail Return Receipt Requested**

March 17, 2011

Charles R. Howell, CEO  
Great Lakes Aviation, Ltd  
1022 Airport Parkway  
Cheyenne, WY 82001

**RE: Industrial Storm Water, SIC 4512, NPDES Compliance Evaluation Inspection, Great Lakes Aviation, Ltd/Great Lakes Airlines, Clovis Municipal Airport, NMU001725, March 2, 2011**

Mr. Howell:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both the USEPA and NMED, regarding modifications and compliance schedules at the addresses below:

Marcia Gail Adams (6EN-AS)  
U.S. Environmental Protection Agency  
Allied Bank Tower  
Region VI Enforcement Branch  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Program Manager  
New Mexico Environment Department  
Surface Water Quality Bureau  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact me at (505) 827-0418.

Sincerely,

/s/Erin S. Trujillo  
Erin S. Trujillo  
Surface Water Quality Bureau

cc: Marcia Gail Adams, USEPA (6EN-AS) by e-mail  
Samuel Tate, EPA (6EN-AS) by e-mail  
Carol Peters-Wagon, USEPA (6EN-WM) by e-mail  
Diana McDonald, USEPA (6EN-WM) by e-mail  
Frank Fiore, NMED Environmental Health Division (NMED District IV) by e-mail  
Steve Summers, Airport Dir, Clovis Municipal Airport by e-mail (ssummers@cityofclovis.org)  
Lynn Hepfinger, Great Lakes Airlines, Clovis Station Manager by e-mail (cvmngr@flygreatlakes.com)



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

### NPDES Compliance Inspection Report

#### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1   N   2   5   3	N   M   U   0   0   1   7   2   5   11   12	1   1   0   3   0   2   17	18   ~	19   S   20	2
Remarks					
A   I   R   T   R   A   N   S   P   O   R   T   A   T   I   O   N   -   S   C   H   E   D   U   L   E   D					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67       69	70   2	71   N	72   N	73	74   75           80

#### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Great Lakes Airlines, Clovis Municipal Airport, northeast corner of CR D and NM Hwy 523 (Airport Highway) near Texico, NM 88135-9776. Curry County	Entry Time /Date 1052 hrs / 03/02/2011	Permit Effective Date September 29, 2008
	Exit Time/Date 1135 hrs / 03/02/2011	Permit Expiration Date September 29, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Steve Summers / Airport Dir, Clovis Municipal Airport, City of Clovis / 575-769-7890 & fax 389-5196 Lynn Hepfinger / Clovis Station Manager, Great Lakes Airlines / 575-389-1230	Other Facility Data Airport Terminal Latitude 34.426732° Longitude -103.082624°	
Name, Address of Responsible Official/Title/Phone and Fax Number Charles R. Howell / Great Lakes Airlines, Great Lakes Aviation, Ltd., Corporate Headquarters, 1022 Airport Parkway, Cheyenne, WY 82001 / main 307-432-7000	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	

#### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

#### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- 1) Great Lakes Aviation, Ltd, an operator furnishing scheduled air transportation conducting aircraft deicing operations at Great Lakes Airlines, Clovis Municipal Airport, did not obtain coverage under the USEPA NPDES 2000 or 2008 industrial stormwater Multi-Sector General Permit (MSGP).
- 2) See attached further explanations.

Name(s) and Signature(s) of Inspector(s) <b>Erin S. Trujillo/s/Erin S. Trujillo</b>	Agency/Office/Telephone/Fax <b>NMED/SWQB/505-827-0418</b>	Date <b>03/17/2011</b>
Signature of Management QA Reviewer <b>Richard E. Powell/s/Richard E. Powell</b>	Agency/Office/Phone and Fax Numbers <b>NMED/SWQB/505-827-2798</b>	Date <b>03/17/2011</b>

**Great Lakes Aviation, Ltd/Great Lakes Airlines, Clovis Municipal Airport  
Compliance Evaluation Inspection – Industrial Stormwater  
NPDES Tracking No. NMU001725  
March 2, 2011**

**Further Explanations**

**Introduction**

On March 2, 2011, a Compliance Evaluation Inspection (CEI) was conducted at the Great Lakes Airlines, Clovis Municipal Airport operations near Texico, New Mexico by Erin S. Trujillo of the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the facility operator's status regarding the National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges associated with industrial activity under 40 Code of Federal Regulations (CFR) 122.26 and the industrial stormwater Multi-Sector General Permit (MSGP).

The Great Lakes Airlines facility at the Clovis Municipal Airport has deicing activities on site that meet the description in Category 40 CFR 122.26(b)(14)(viii), and Sector S (Air Transportation Facilities) of the MSGP. Stormwater discharges are to unclassified surface waters, then Lariat Draw, then Blackwater Draw in the Brazos Headwaters Sub-basin, Texas-Gulf Basin tributary to the Brazos River in Texas.

Upon arrival at approximately 1052 hours on March 2, 2011, the inspector made introductions, stated the purpose of the inspection and presented credentials to Mr. Steve Summers, Airport Director, Clovis Municipal Airport, City of Clovis (Airport Authority). The inspector made introductions and stated the purpose of the inspection to Ms. Lynn Hepfinger, Clovis Station Manager, Great Lakes Airlines by telephone. The inspector toured those portions of the facility with Mr. Summers where Great Lakes Airlines had deicing activities (directly outside the terminal gate). A print out of USEPA's permit fact sheet, sector-specific requirements and industry series fact sheet was left with staff of Great Lakes Airlines to provide to Ms. Hepfinger. The inspector left the facility at approximately 1135 hours on the day of the inspection. The inspector later returned to the facility and conducted an on-site exit interview in person to discuss preliminary findings with Ms. Hepfinger and Mr. Barry Brown, Agent, Great Lakes Airlines from approximately 1824 to 1850 hours on the day of the inspection. Additional information was obtained and preliminary findings of the inspection were discussed with Mr. Larry Graff, Managing Director of Customer Service, Great Lakes Aviation, Ltd by telephone on March 16, 2011.

This report is based on review of EPA's on-line notice of intent (eNOI) database, files maintained by NMED, on-site observation by NMED personnel, and verbal information provided by the City of Clovis Municipal Airport director and operator representatives. An inspection of other air transportation activities at the City of Clovis Municipal Airport (City of Clovis NPDES Tracking No. NMR05GG33), permittees at the airport having coverage under the 2008 MSGP, or tenants was not conducted.

**Clean Water Act (CWA) and Industrial Stormwater Permit Requirements**

Section 301 (a) of the Federal Water Pollution Control Act states that *"Except as in compliance with this section and sections 302, 306, 307, 318, 402 and 404 of this Act, the discharge of any pollutant by any person shall be unlawful."* Federal regulations in 40 CFR Part 122.21(a) Duty to apply (1) states: *"Any person who discharges or proposes to discharge pollutants...must submit a complete application to the Director in accordance with this section and part 124 of this chapter."*

To obtain permit coverage under the MSGP, an operator must complete a Stormwater Pollution Prevention Plan (SWPPP) that among other things documents eligibility for permit coverage, and submit a Notice of Intent (NOI) to the USEPA. USEPA's MSGP was re-issued effective September 29, 2008 (Federal Register/Vol. 73, No. 189/Monday, September 29, 2008 pg. 56572) and replaced the 2000 MSGP which expired on October 30, 2005. USEPA's MSGP and additional information is available at:

[http://cfpub1.epa.gov/npdes/stormwater/msgp.cfm#permit\\_factsheet](http://cfpub1.epa.gov/npdes/stormwater/msgp.cfm#permit_factsheet)

An industrial fact sheet series for air transportation facilities, which is available at USEPA's website [http://www.epa.gov/npdes/pubs/sector\\_s\\_airtransmaint.pdf](http://www.epa.gov/npdes/pubs/sector_s_airtransmaint.pdf), provides a brief summary of the NPDES industrial stormwater permitting program, the types of facilities included, a summary of typical pollutants associated with activities, and types of stormwater control measures (best management practices or BMPs) used to minimize the discharge of those pollutants.

Appendix A of the 2008 MSGP, "*Operator*" is defined as "any entity with a stormwater discharge associated with industrial activity that meets either of the following two criteria: (i) The entity has operational control over industrial activities, including the ability to modify those activities; or (ii) The entity has day-to-day operational control of activities at a facility necessary to ensure compliance with the permit."

An airport typically operates under a single management organization known as the airport "authority" which in most cases is a public agency. Airline carriers and other fixed base operators (e.g., fueling companies and maintenance shops) that have contracts with the airport authority to conduct business on airport property are commonly referred to as "tenants" of the airport. Those tenants that have stormwater dischargers associated with industrial activities under 40 CFR 122.26(b)(14) require permit coverage. Where an airport has multiple operators (airport authority and tenants) that have stormwater discharges associated with industrial activity, each operator is required to apply for coverage under an NPDES stormwater permit. This may be done as separate operators or may be done as co-permittees. Each individual party must submit a Notice of Intent (NOI) to be covered under the MSGP.

### **On-site Industrial Activities**

The City of Clovis (airport authority) requires each tenant or fixed-based operator involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling and lubrication), equipment cleaning operations or deicing operations to have their own SWPPP.

Great Lakes Airlines' operations at the Clovis Municipal Airport started approximately six years ago in April of 2005. Great Lakes Airlines at Clovis Municipal Airport does not conduct vehicle maintenance or fueling on site according to on-site representatives. The first deice event would have happened during October of 2005 according to the operator's representative. For the last four years, Great Lakes Airlines at the Clovis Municipal Airport has used propylene glycol-based chemicals for deicing aircraft exteriors. Corporate wide, the aircraft deicing season is between September 15 to May 31. Great Lakes Aviation, Ltd last purchased deicing chemicals (four 55-gallon drums or 220 gallons) for the Clovis Municipal Airport activities on January 1, 2010.

### **Findings**

Great Lakes Aviation, Ltd, an operator furnishing scheduled air transportation conducting aircraft deicing operations at Great Lakes Airlines, Clovis Municipal Airport, did not develop a SWPPP or submit a NOI to obtain authorization to discharge industrial stormwater under the USEPA NPDES MSGP. A NOI was not submitted prior to deicing or before the 2000 MSGP expired on October 30, 2005. The deadline for submitting a NOI for the 2008 MSGP was January 5, 2009.

Practices to control pollutants were observed at the facility that would minimize and prevent the discharge of pollutants in stormwater. Deicing chemicals in drums were stored on an impervious surface and raised on pallets. Also, a labeled spill kit (plastic drum) was located near the deicing chemical storage and aircraft deicing operations.

However, there was no SWPPP to document that permit and Sector S-specific requirements for technology-based effluent limits (good housekeeping measures, source reduction, and management of runoff) were met. Permit requirements also require routine facility inspections at least monthly during the deicing season, annual comprehensive inspections and reporting. Potential pollution source requirements in Part 8.S of the 2008 MSGP requires records of the types of deicing chemicals used (including the Material Safety Data Sheets [MSDS]) and the monthly quantities, either as measured or, in the absence of metering, estimated. If not properly managed or minimized in accordance with the USEPA's NPDES MSGP, pollutants in stormwater and any allowable non-stormwater discharges from this facility's industrial activity are a potential threat to water quality.