EPA United States Environmental Protection Agency

EPA REGION 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	09/16/2024 09:30 AM (PT)	Announced: No
Inspection Exit Date/Time	10/01/2024 10:45 AM (PT)	Access: Granted
Weather	65°F, Overcast	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial	
Type of Inspection	Compliance Evaluation Inspection	
Permittee Name	Avcenter, Inc.	
Facility or Site Name	Avcenter, Inc.	
Facility/Site Physical Address	103 Municipal Way	
City, State, Zip Code	Nampa, Idaho 83687	
County/Borough/Parish	Canyon	
Facility GPS Coordinates	43.583406, -116.523940	
FRS ID	IDT8720093512	
Permit Number	IDR05J109	
SIC	4522 (Air Transportation, nonscheduled)	

Lead Inspector:

RAYMOND ANDREWS Digitally signed by RAYMOND ANDREWS Date: 2024.11.06 13:20:00 -08'00'

Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252

Supervisor Review:

PETER CONTRERAS Digitally signed by PETER CONTRERAS Date: 2024.11.06 13:50:08 -08'00'

Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at Avcenter, Inc. (the "Site" or "Facility"), located at 103 Municipal Way, Nampa, Idaho, at 09:30 AM (PT) on 09/16/2024 for an unannounced inspection. I presented my credentials to Greg Goodman and informed him I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA), and the facility's Multi-Sector General Permit (MSGP), permit number IDR05J109.

The person I needed to speak with, Kyle Schab, the City of Nampa Stormwater Specialist, was on vacation and would not return for two weeks. Mr. Goodman could not answer my questions or provide the records I requested for review, so I had him give me a tour of the facility and set up a teleconference for when Mr. Schab returned on October 1st.

This report is based on information supplied by facility representatives during the teleconferece, my direct observations, and records and reports maintained by the permittee. In addition, information gathered prior to, or after, the inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
City of Nampa	Greg Goodman	Stormwater Supervisor	Yes	Yes
City of Nampa	Lynsey Johnson	Airport Superintendent	Yes	Yes
City of Nampa	Kyle Schab	Stormwater Specialist	Yes	Yes
Avcenter, Inc.	John Blakely	Owner	Yes	Yes

Facility Information

Responsible Official	Kyle Schab
Type of Operation	Airport Facility
Industrial Sector/Sub-sector	Sector S - Air Transportation Sub-sector S1 - Air Transportation Facilities
Is property owned?	The airport is owned by the City of Nampa.
Years in Operation	The Nampa airport has been in operation since 1928.
Size of Facility	The total area of the site is approximately 200 acres. Although the operational area is considerably less.
Number of Employees	The facility is staffed with 10 employees from 8:00am until 5:00pm, Monday through Friday. There is a single employee at the site on Saturday and Sunday working the same hours.
Personnel conducting Inspections/Sampling	Through an agreement between Avcenter, Inc. and the City of Nampa, Mr. Schab performs the inspections and conducts sampling for the facility.
Outfalls/Sampling Locations	The facility discharges from a single outfall, Outfall 001, which is in the northwestern portion of the property. The outfall discharges stormwater into a municipal separate storm sewer system (MS4) that drains into Mason Creek. Another outfall on site, Outfall 002, has been abandoned because no stormwater has been discharged during any past storm events.

Receiving Water	The stormwater flows through the City of Nampa's MS4 into Mason Creek which empties into the Boise River.
BMPs/Stormwater Treatment	The site uses catch basins with witches' hats to collect and filter pollutants out of the stormwater prior to the water entering the City's MS4 system. The site also has retention ponds; however, they receive little, if any, stormwater even during the heaviest rainfall events because most of the stormwater infiltrates prior to reaching the retention pond.
Industrial Activities Exposed to Stormwater	The facility conducts mobile fueling operations and some airplane washing. Airplane washing is conducted in permeable areas or paved areas located next to, and draining into, pervious surfaces. The facility does not use detergents during aircraft washing.
Does the facility use glycol or urea for de-icing operations?	The facility does not use glycol or urea-based products because no de-icing activities are conducted at this site.

SECTION II – Observations
No observations were made during the site tour that constitute an area of concern.

SECTION III – Records Review
Records may not be in sequential order.

Record: SWPPP		**AOC:** Yes
Ref #: RA1-RR-006	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/05/2024
Post inspection, I reviewed the combined Stormwater Pollution Prevention Plan (SWPPP), dated May 18, 2021, and the included SWPPP map. The SWPPP covers the Nampa Municipal Airport and its tenets. The SWPPP indicated the facility discharges into the City of Nampa's Municipal Separate Storm Sewer System (MS4). During review of the SWPPP map, I noted a few areas of concern. The SWPPP map did not include the directions of stormwater flow using arrows, the locations of all stormwater monitoring points; and the point the facility discharges into the MS4. The SWPPP's Amendment (Modification) Log was not signed and certified in accordance with the permit. Also, the SWPPP was not signed and certified in accordance with the permit due to the signatory, Evan Jenkins, no longer being employed with the City of Nampa.		
Record: Other - Routine Facility Inspections		**AOC:** Yes
Ref #: RA1-RR-005	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/01/2024
Post inspection, I reviewed the facility's Routine Facility Inspections reports from 4Q 2022 through 3Q 2024. I did not identify any areas of concern in the 4Q 2022 inspection report. The facility sent me unsigned copies of the routine inspection reports for 1Q 2023 through 3Q 2024.		
Record: Annual Reports		**AOC:** Yes
Ref #: RA1-RR-004	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/01/2024
Post inspection, I reviewed the facility's Annual Reports for the 2022 and 2023 reporting years. I did not identify any areas of concern in the 2022 Annual Report. The 2023 Annual Report did not contain a summary of the facility's 4th quarter routine inspection.		
Record: Other - Nampa Municipal Airport SWPPP Fact Sheet for Tenants		**AOC:** No
Ref #: RA1-RR-003	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/01/2024
Post inspection, I reviewed the Tenet Responsibility Fact sheet, dated May 18, 2021. The fact sheet spelled out the tenets' responsibilities regarding Industrial Activities and Fuel/Chemical Storage, Good		

Housekeeping, Minimizing Pollutant Exposure to Stormwater, Maintenance, and Spill Prevention and Response.		
Record: Other - Letter of Authorization		**AOC:** No
Ref #: RA1-RR-002	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/01/2024
Post inspection, I reviewed a letter, dated November 22, 2022, from Avcenter, Inc. authorizing Kyle Schab, City of Nampa Environmental Compliance Officer, to act as a Duly Authorized Representative with overall responsibility for environmental and/or operations for Avcenter, Inc. under permit number IDR05J109.		
Record: Other - Quarterly Visual Assessments		**AOC:** Yes
Ref #: RA1-RR-001	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 11/01/2024
Post inspection, I requested for review the facility's Quarterly Visual Assessment (QVA) from 4Q 2022 through 3Q 2024. I did not identify any areas of concern in the 4Q 2022 through 4Q 2023 QVAs. The facility submitted an unsigned copy of the 1Q 2024 QVA. I did not identify any areas of concern in the 2Q 2024 QVA. The facility did not submit a copy of the 3Q 2024 QVA.		

SECTION IV – Sampling Activities

No sampling was conducted.

SECTION V – Areas of Concern

Areas of Concern may not be in sequential order.
The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-004	**Records Review: Annual Reports**
Permit Requirement Part 7.4.1 of the permit states, in part, A summary of your past year’s routine facility inspection documentation..."	
AOC: The 2023 Annual Report did not contain a summary of the facility's 4th quarter routine inspection.	
AOC Reference #: RA1-RR-005	**Records Review: Other - Routine Facility Inspections**
Permit Requirement Part 3.1.6.7 of the permit states the Routine Facility Inspection Documentation must include, "A statement, signed and certified in accordance with Appendix B, Subsection 11." Appendix B, Part 11.E of the permit states, in part, "Any person signing documents in accordance with Appendix B, Subsections 11.A or 11.B above must include the following certification: “I certify under penalty of law that this document and all attachments were prepared under my direction or supervision…the information contained is, to the best of my knowledge and belief, 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.”	
AOC: The routine inspection reports I reviewed for 1Q 2023 through 3Q 2024 were unsigned.	

AOC Reference #: RA1-RR-001	**Records Review: Other - Quarterly Visual Assessments**

Permit Requirement
Part 3.2.3.8 of the permit states Quarterly Visual Assessment documentation must include, "A statement, signed and certified in accordance with Appendix B, Subsection 11."

Appendix B, Part 11.E of the permit states, in part, "Any person signing documents in accordance with Appendix B, Subsections 11.A or 11.B above must include the following certification: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision…the information contained is, to the best of my knowledge and belief, 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."

AOC:
The Quarterly Visual Assessment for 1Q 2024 was unsigned.

AOC Reference #: RA1-RR-001	**Records Review: Other - Quarterly Visual Assessments**

Permit Requirement
Part 3.2.3 of the permit states, in part, "You must document the results of your visual assessments and maintain this documentation onsite with your SWPPP as required in Part 6.5…You are not required to submit your visual assessment findings to EPA, unless specifically requested to do so."

AOC:
The facility did not provide a copy of the 3Q 2024 Quarterly Visual Assessment upon request.

AOC Reference #: RA1-RR-006	**Records Review: SWPPP**

Permit Requirement
Part 6.2.2 of the permit states, "Your SWPPP must include the following..."

Part 6.2.2.3 of the permit states, in part, "Provide a map showing...c. Directions of stormwater flow (use arrows)...i. Locations of all stormwater monitoring points...municipal separate storm sewer systems (MS4s) and where your stormwater discharges to them..."

AOC:
The SWPPP map did not include the directions of stormwater flow (using arrows), locations of all stormwater monitoring points; and the point the facility discharges into the municipal separate storm sewer system (MS4).

AOC Reference #: RA1-RR-006	**Records Review: SWPPP**

Permit Requirement
Part 6.3 of the permit states, "You must modify your SWPPP based on any corrective actions and deadlines required under Part 5. You must sign and date any SWPPP modifications in accordance with Appendix B, Subsection 11."

Appendix B, Part 11.E of the permit states, in part, "Any person signing documents in accordance with Appendix B, Subsections 11.A or 11.B above must include the following certification: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision…the information contained is, to the best of my knowledge and belief, 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."

AOC: The SWPPP's Amendment (Modification) Log was not signed and certified in accordance with the permit.	
AOC Reference #: RA1-RR-006	**Records Review: SWPPP**
Permit Requirement Part 6.2.7 of the permit states, in part, "You must sign and date your SWPPP in accordance with Appendix B, Subsection 11." Appendix B, Part 11.E of the permit states, in part, "Any person signing documents in accordance with Appendix B, Subsections 11.A or 11.B above must include the following certification: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision…the information contained is, to the best of my knowledge and belief, 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."	
AOC: The SWPPP was not signed and certified in accordance with the permit due.	

SECTION VI – Closing Conference

I held a closing conference with Facility personnel at 10:45 AM (PT) on 10/01/2024 for the inspection. During the closing conference, I discussed the observations and Area(s) of Concern identified during the inspection. Observations and Area(s) of Concern have not yet been evaluated for a formal compliance determination.

NOTE: No photos were taken during this inspection.