

REPORT OF COMPLIANCE EVALUATION INSPECTION
(INDUSTRIAL STORMWATER)

Omaha Airport Authority- Millard Airport
12916 Millard Airport Plaza, Omaha, Nebraska 68118

Mailing Address
4501 Abbott Dr., Suite 2300, Omaha, Nebraska 68110

Authorization Number: **ISW-202200455**

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

ON
October 3, 2023

Introduction

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Compliance Evaluation Inspection (Industrial Stormwater) was conducted on October 3, 2023, at Millard Airport located at 12916 Millard Airport Plaza in Omaha, Nebraska. The inspection was conducted under the authority of Section 308 of the Clean Water Act, as amended. It was conducted in accordance with the U.S. Environmental Protection Agency (EPA) Region 7 Standard Operating Procedures for Compliance Inspections (ENST SOP No. 2332). This narrative report presents the findings of the inspection. Jason Windhorst and Sam Fleagle with the Nebraska Department of Environment and Energy-NPDES Compliance Section were present during the inspection.

Participants

Millard Airport

- Trevor Tonniges, Project Manager Omaha Airport Authority
Trevor.Tonniges@FlyOMA.com
- Dave Poole, General Manager, Oracle Aviation

Nebraska Department of Environment and Energy-NPDES Compliance Section

- Jason Windhorst, Environmental Specialist, QCIS, QPSWPPP
- Sam Fleagle, Environmental Specialist

U.S. Environmental Protection Agency (EPA), Region 7

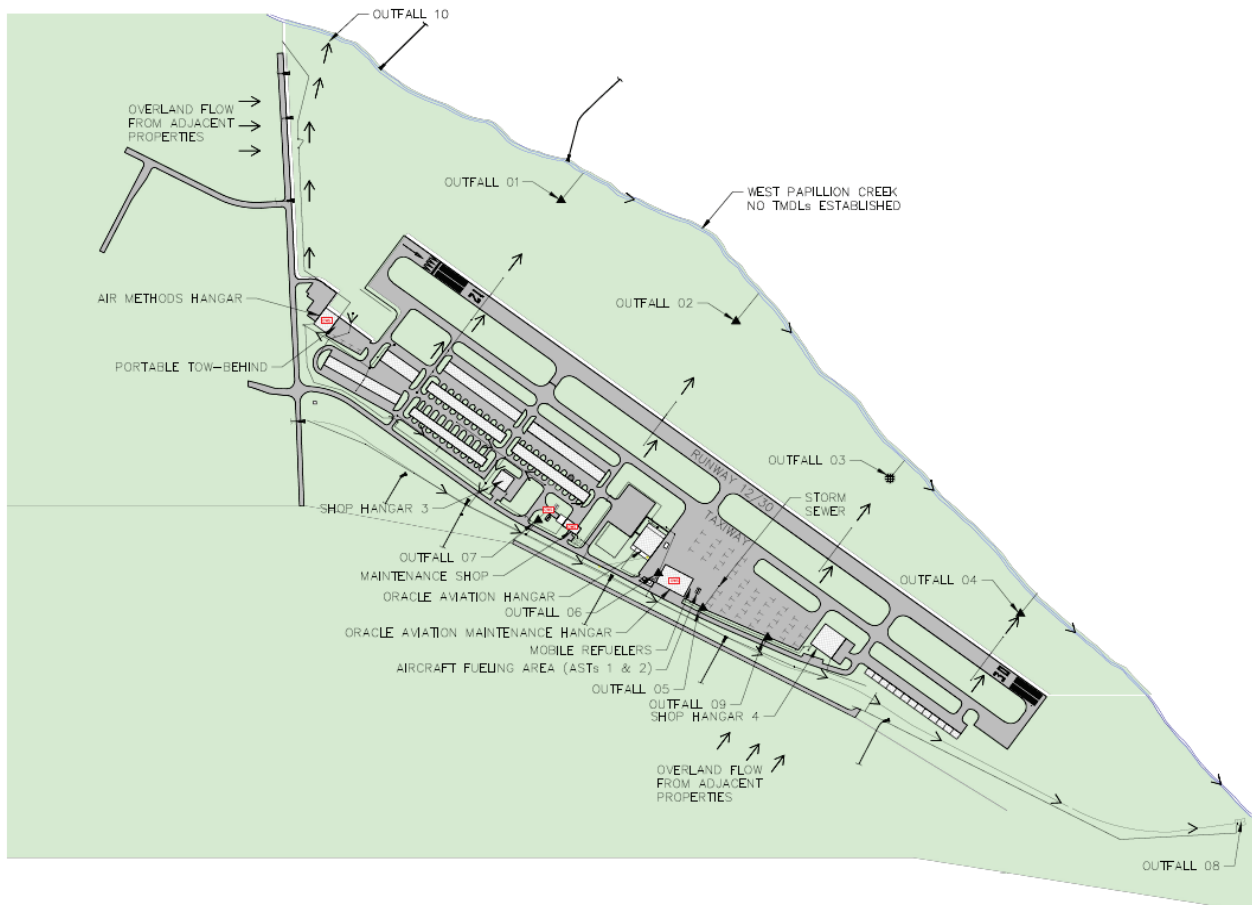
- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS

Facility Description

The Millard Airport (Airport) is located in Omaha, Nebraska near the intersection of 132nd and Harrison Streets on a 170-acre property. The Airport is the fixed-base operator (FBO) for Oracle Aviation and is owned by the Omaha Airport Authority which also owns Eppley Airfield (OMA). Activities at the airport include chartered flights, aircraft maintenance and fueling, and hangar storage. There are a total of 14 structures on the Airport; paved surfaces connect each structure to the airport apron and taxiway/runway, and the runway and taxiway are located north of the apron and buildings. As shown in Figure 1 below. The Airport is operating around the clock seven days a week and employs approximately 50 people including office staff, maintenance staff, and pilots.

Activities on site fall under Standard Industrial Classification (SIC) Code 4512-4581. Therefore, the Airport is regulated under Sector S- Air Transportation of the Nebraska Department of Environment and Energy (NDEE) General Permit under the National Pollutant Discharge Elimination System (NPDES). Currently, the Airport operates under the NDEE-NPDES GP Authorization number ISW-202200455 that will expire at midnight, on March 31, 2027. Potential pollutant sources include aircraft fueling and maintenance and deicing of the runway and taxiway. Fueling and maintenance activities occur near the aboveground fuel tanks, at the Oracle Aviation FBO, and at the Air Methods Hangar.

Figure 1, Millard Airport Property



Stormwater Runoff Patterns

As indicated on Figure 1 above, generally:

- Stormwater near the buildings flows toward inlets that connect to an underground storm sewer (Outfalls O5, O6, O7, O8, and O9) which drains south into the Omaha Municipal Separate Storm Sewer System (MS4) sewer line located south of the Airport. Stormwater then flows southeast via the spillway and into West Papillion Creek.
- Outfalls O5 through O9 are considerably identical outfalls. Outfall O5 is the representative outfall which is monitored for outfalls O5-O9.
- Outfall O7 currently does not have any potential pollutants associated with the discharge.
- The taxiway and runway are drained by inlets and edge drains (along the runway) that discharge into grassy swales (Outfalls O1, O2, O3, and O4) that flow northeast toward West Papillion Creek.
- Outfalls O1 through O4 are considerably identical outfalls. Outfall O1 is the representative outfall which is monitored for outfalls O1-O4.
- Stormwater from the small area where the Air Method hangar and run-on from the grassy area west of the Airport flows into West Papillion Creek via Outfall O10 which currently does not have any potential pollutants associated with the discharge.

Findings and Observations

1. Overall, at the time of the inspection, the site appeared to be well managed and good housekeeping practices were apparent.
2. BMPS and controls appeared adequate and are discussed in the ISW Checklist (Attachment 1).
3. At the time of the inspection, I did not observe discharge to the Omaha MS4 or West Papillion Creek.
4. My review of the Stormwater Pollution Prevention Plan (SWPPP) indicates that the SWPPP (Attachment 2) is current, well written, and it reflects current site operations. Implementation of the SWPPP appeared adequate with the exception of what will be discussed in Item 5 below.
5. I issued Notice of Preliminary Finding number 1 (NOPF #1) on October 3, 2023(Attachment 4), because the Airport failed to comply with (1) *Section 2.1.2.9- Employee Training* of the NPDES permit that requires the permittee train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of the permit (e.g., inspectors, maintenance personnel), including all members of the storm water pollution prevention team, and (2) *Section 4.1.8- Employee Training* of the SWPPP which requires that an employee training program to inform personnel at all levels of responsibility of the components and goals of the SWPPP plan. As mentioned above, the Airport employs approximately 50 employees. The Airport however, only trained the five member SWPPP team and failed to train other site personnel.

According to the permit and the SWPPP, the training must cover both the specific control measures used to achieve the effluent limits, and monitoring, inspection, planning, reporting, and documentation requirements in the permit. NDEE recommends training be conducted at least annually (or more often if employee turnover is high). Training will address each component of the SWPPP plan; including how and why tasks are to be implemented.

Training, per the SWPPP, is to be conducted annually for all Airport personnel that are responsible for implementing the SWPPP plan and should be documented. However, that's not being done.

6. Sector S- Air Transportation of the GP requires the Airport to conduct:
 - a. Visual Monitoring: Quarterly visual monitoring of Outfalls O1 and O5 as they are the representative outfalls of all ten outfalls. Records indicate that staff of the Airport conducted visual monitoring accordingly (Attachment 2).
 - b. Benchmark Monitoring: not required because the Airport does not exceed the deicing chemical usage thresholds of 100,000 gallons of glycol and/or 100 tons of urea per year. The Airport uses Cryotech E36 deicer, a potassium acetate-based mixture, and Newdeal Blend, a sodium formate/sodium acetate mixture, that do not contain glycol or urea.
 - c. Indicator Monitoring: the NPDES permit requires indicator monitoring of storm water discharges for Sector S to monitor for polycyclic aromatic hydrocarbons (PAHs). Monitoring will be required biannually in the first and fourth years of the permit coverage at outfalls O1 and O5. Monitoring is required for 16 individual PAHs listed on page 16 of the SWPPP (Attachment 2). Records indicate that staff of the Airport conducted Indicator monitoring accordingly (Attachment 2).
7. Records indicate that qualified Airport personnel conducted quarterly inspections as required. Inspection frequency changes to monthly during the deicing season (October- April) (Attachment 2).
8. Records indicate that qualified airport personnel conducted annual comprehensive site compliance evaluation as required.
9. Based on the aboveground storage capacity of aggregate petroleum products stored on site, the total exceeds 1,320 gallons. The Airport has developed and is currently implementing a Spill Control and Countermeasure Plan (SPCC) in accordance with [§112.7](#) and all other applicable sections of 40 CFR Part 112, §112.3 (Attachment 3).
10. On October 23, 2023, I received, via mail, a response to the NOPF (Attachment 8).

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Naji J. Ahmad
Environmental Engineer, WB/DWIS

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Date: 2023.12.15 11:23:35 -06'00'

Jodi Bruno
Manager, ECAD-WB

Attachments

1. ISW Checklist
2. NOI Approval
3. SWPPP
4. SPCC plan
5. NOPF
6. Photo Log
7. CBI
8. Response to the NOPF