

**Appendix B**  
**Environmental Regulation**  
**Prepared by Mead & Hunt, Inc.**  
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## 1.0 Introduction

This Appendix describes environmental regulation associated with activities at PSC relating to Hazardous Material, Pollution Prevention, and Solid Waste.

## 2.0 Definitions

For the purpose of this Appendix, the following definitions apply.

Significant Materials include, but are not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); any chemical the facility is required to report pursuant to the Superfund Amendments and Reauthorization Act (SARA); fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have the potential to be released with stormwater discharges.

Industrial Activities are classified as equipment maintenance, including: rehabilitation, mechanical repairs, painting, fueling, or lubrication; equipment cleaning operations; aircraft deicing, and pavement deicing. Areas not associated with industrial activities include: employee parking; access roads and rail lines; passenger loading, unloading, and holding areas; and administrative buildings.

## 3.0 Regulation

State and federal regulations associated with the storage and use of significant materials are described below.

### Federal Oil Program

The Federal Oil Program was established by the Environmental Protection Agency (EPA) to prevent, prepare for, and respond to oil spills that occur in and around inland waters of the United States. Under 40 Code of Federal Regulations (CFR) 112 *Spill Prevention, Control, and Countermeasure* (SPCC), the EPA regulates owners and operators of non-transportation related facilities with a total above ground oil storage capacity of greater than 1,320 gallons or underground oil storage capacity of greater than 42,000 gallons, and are located such that they could reasonably be expected to discharge oil to a navigable waterway. Facilities subject to the SPCC rule must prepare and implement SPCC plans detailing the facility's oil storage (greater than 55 gallons) spill prevention and control measures and response procedures.

### State Spills Program

The Washington Department of Ecology (DOE) Spills Program focuses on the prevention of oil spills to Washington waters and land. Under 173-180-610 Washington Administrative Code (WAC) plan preparation, “spill prevention countermeasure and control plans, operation manuals, and other prevention documents which meet federal requirements under 33 CFR 154, 33 CFR 156, 40 CFR 109, 40 CFR 112, or the Federal Oil Pollution Act may be submitted to satisfy plan requirements under this chapter if ecology deems that such federal requirements equal or exceed those of ecology, or if the plans are modified or appended to satisfy plan requirements under this chapter”. Therefore, a facility that prepares and implements an SPCC plan may submit that plan to the DOE.

### State Storage Tanks Program

Aboveground Storage Tanks (ASTs) in Washington are required to be inspected and maintained in accordance with American Petroleum Institute (API) Standard 653, and are subject to the Internal Fire Code, which is part of the Washington Uniform Building Code, administered by the local fire district. There are no underground storage tanks at PSC.

### State Water Quality Program

State of Washington DOE Water Quality Program focuses prevention of water pollution within the state. Point sources of pollution are regulated under the National Pollutant Discharge Elimination System (NPDES) Permit. The DOE provides permit coverage under the Industrial Stormwater General Permit (General Permit) for transportation facilities classified under Standard Industrial Classification (SIC) 4500, *Transportation by Air*, which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations.

Industrial facilities that discharge stormwater to the ground, and have no point source discharge to surface water or a municipal storm sewer, do not require coverage under the General Permit, unless determined to be a significant contributor of pollutants to ground water. Industrial facilities that discharge wastewater to a Publicly Owned Treatment Works or to ground are subject to the DOE's Waste Discharge Permit, 173-216 WAC. Discharge to ground includes infiltration basins, dry wells, drain fields, and grassy swales. Industrial facilities that discharge to a drywell, drainfield, or infiltration system that uses perforated pipe to discharge to the subsurface must comply with the Underground Injection Control Program, 173-218 WAC.

## 4.0 Activities

### Drainage

Airport drainage is collected on-site in swales, drywells, and networks, and stormwater is not discharged off-site. Runoff from the commercial portion of the terminal apron is collected in trench drains and discharged to oil-water separators, which discharge into percolation trenches located on the northeast side of Taxiway D. Runoff from the transient portion of the terminal apron is collected in storm sewer and discharged to an infiltration basin located southwest of the apron, between the airport traffic control tower (ATCT) and the airport rescue and fire fighting (ARFF) facility. Runoff from the terminal building and automobile parking area is collected in storm sewer and discharged to an infiltration basin between the short-term and long-term parking lots. Aircraft washing occurs on the GA apron which discharges to an infiltration basin. Runoff from pavement surfaces drain to infiltration devices, where runoff enters the ground and percolates to groundwater.

In November 2005, the DOE determined that PSC is exempt from permitting under the General Permit, as the Airport drains to the ground and PSC has not been deemed a significant contributor of pollutants to groundwater.

### Fueling

Bergstrom Aviation and Tri-Cities Aviation each have oil storage capacity which requires compliance with the Federal Oil Program. The two fixed-base operators (FBOs) each maintain their own SPCC Plans, and have registered their ASTs with the state. Both FBOs have mobile refueling vehicles to provide service around the Airport.

PSC stores maintenance equipment and conducts vehicle maintenance within the Airport Maintenance Building. PSC does not store oil products over the 55 gallon amount for qualifying facilities, and is therefore not required to and does not hold a SPCC Plan.

### Deicing

Aircraft deicing occur primarily on the deicing pad, located on the terminal apron ramp. This effluent is collected in an adjacent facility and tank, where it is either transported or discharged to the City of Pasco's sanitary sewer system. Aircraft deicing also occurs at Bergstrom Aviation, on the general aviation (GA) apron. This effluent discharges to the City of Pasco's sanitary sewer system, and is permitted under the DOE's Waste Discharge Permit program. Pavement deicing agents are used on walkways, and deicing agents stored indoors. Pavement deicers are not used on airfield pavements.

In September 2009, the EPA published proposed rulemaking *Effluent Limitation Guidelines and New Source Performance Standards for the Airport Deicing Category*. The rule's intent is stronger regulation of commercial service airports utilizing sprayed deicing fluids and urea-based airfield pavement deicers. The rule applies to primary commercial service airports that conduct deicing operations and have more than 1,000 annual scheduled commercial jet operations, which includes PSC. The rule separates airports into classes.

1. Airports with less than 10,000 annual departures must:
  - certify use of non-urea based pavement deicers or meet a daily ammonia effluent limit of 14.7 mg per liter (mg/l).
2. Airports with 10,000 or more annual departures which use less than 460,000 gallons of aircraft deicing fluid (ADF) annually must:
  - collect 20 percent of available ADF;
  - treat wastewater to meet a daily effluent limit of 271 mg/l and a weekly average of 154 mg/l, and;
  - certify use of non-urea based pavement deicers or meet a daily ammonia effluent limit of 14.7 mg/l.
3. Airports with 10,000 or more annual departures which use 460,000 or more gallons of ADF annually must:
  - collect 60 percent of available ADF;
  - treat wastewater to meet a daily effluent limit of 271 mg/l and a weekly average of 154 mg/l, and;
  - certify use of non-urea-based pavement deicers or meet a daily ammonia effluent limit of 14.7 mg/l.

PSC meets the first class, based on the current and expected number of commercial jet operations. PSC uses an average of 6,000 to 9,000 gallons of aircraft deicing fluid per year. As PSC activity increases, the applicable class may change. PSC should continue to monitor the progress of the draft regulation.