# **INTEGRATED CONTINGENCY PLAN** (ICP)

January 6, 2023


## Detroit Metropolitan Wayne County Airport

**Wayne County Airport Authority**
Department of Environment & Sustainability
Detroit Metropolitan Airport
Berry Administration Building – 2nd Floor

Romulus, Michigan

## EMERGENCY CONTACTS LIST

1. All Spills - Inform your Supervisor immediately.

2. If Spill is ***GREATER THAN*** Five (5) Gallons (fuel, oil, or other significant materials) or if the spill reaches the DTW stormwater system, call the Detroit Metropolitan Airport (DTW) Airfield Rescue and Fire Fighting (ARFF) Department (ARFF is staffed 24-Hours/Day):

| | |
|---|---|
| ARFF – Emergency - EMERGENCY (24-hrour) | 911 |
| ARFF – Non-emergency (24-hour) | (734) 942-3600 |

3. Call the Spill Response Coordinator (#4 below) to determine reporting obligations, if any:
4. **James Cullen – Environmental Operations Manager / Spill Response Coordinator**

| | |
|---|---|
| **Office Phone:** | **(734) 247-3748** |
| **Cell Phone:** | **(734) 968-2166** |

5. If Spill Response Coordinator is not available, contact the Alternate Spill Response Coordinator:

| | |
|---|---|
| **Matt Bell, PE** | |
| **Office Phone:** | **(734) 247-7370** |
| **Cell Phone:** | **(734) 497-3513** |

6. Other Contacts (inform the Spill Response Coordinator prior to contacting any of the parties below):

Michigan Department of Environmental Energy, Great Lakes, and Environment (EGLE):

- *Normal Business Hours (8 a.m. to 5 p.m.)*
  Southeast Michigan (Warren) EGLE District Office (586) 753-3700
- *After Hours or No-Answer at EGLE District Office*
  EGLE Spills/Emergency Hotline (24-Hour) (800) 292-4706

National Response Center (800) 424-8802

Downriver Wastewater Treatment Facility (spills to sanitary sewer) (734) 213-5107

Great Lakes Water Authority Treatment Facility (Pond 3W Force-Main) (313) 297-0322
(313) 267-6000 (within one hour of becoming aware of an accidental discharge entering the Force-Main).

Wayne County Bridges Division (stormwater pump stations) (734) 955-2198

Limno-Tech, Inc. (Consultant):

| | |
|---|---|
| **Chris Cieciek** | |
| **Office Phone:** | **(734) 821-3160** |
| **Cell Phone:** | **(734) 929-8286** |

| | |
|---|---|
| Marine Pollution Control (Cleanup Contractor) | (800) 521-8232 |
| US Ecology (Cleanup Contractor) | (800) 539-3975 |

***INFORMATION TO BE REPORTED BY CALLER IS LOCATED ON THE NEXT PAGE.***

# *INFORMATION TO BE REPORTED BY CALLER IN EVENT OF SPILL*

**CALLER SHOULD PROVIDE THE FOLLOWING INFORMATION:**

- ADDRESS AND PHONE NUMBER OF THE AIRPORT LOCATION WHERE SPILL OCCURRED;
- Date and time of spill;
- Type of material spilled;
- Estimate of total quantity spilled;
- Source of the spill;
- Cause of spill;
- Media affected or threatened by the spill (i.e., water, land, air);
- Any damages or injuries caused by the spill;
- Actions being taken to stop or mitigate the spill;
- Whether an evacuation may be needed;
- Weather conditions at the incident location;
- The names of individuals or organizations who have also been contacted;
- Any other information that may help emergency personnel respond.

**MINOR SPILL**

A "minor" spill is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product spilled is small (e.g., involves less than 5 gallons of oil or other significant material);
- Spilled material is easily contained and controlled at the time of the discharge;
- Spill is localized near the source;
- Spilled material is not likely to reach surface waters;
- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

WCAA personnel can usually address **MINOR** spills. The following guidelines apply:

- Immediately notify the **WCAA Supervisor** on duty in the Department involved.
- Call the Spill Response Coordinator to report the spill and determine who else should be notified.
- Under direction of the Supervisor, contain the spill with appropriate response materials and equipment. Place discharge debris in properly labeled waste containers.
- Notify the **Spill Response Coordinator** if there are questions regarding the spill following clean up.

***ADDITIONAL INFORMATION LOCATED ON THE NEXT PAGE.***

## *INFORMATION TO BE REPORTED BY CALLER IN EVENT OF SPILL (CONTINUED)*

**MAJOR SPILL**

A "major" spill is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The spill is large enough to spread beyond the immediate spill area;
- The spilled material enters on-site storm and/or sanitary sewers;
- The spill requires special equipment or training to clean up;
- The spilled material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a **MAJOR** spill, the following guidelines apply:

- Notify your Supervisor immediately.
- Call 911 to report the spill to the WCAA Airfield Rescue and Fire Fighting Department.
- If spill is flammable and if possible and safe to do so, eliminate potential spark sources.
- If possible and safe to do so, identify and shut down the source of the discharge.
- Evacuate the spill site and move to a safe distance from the spill.
- Call the **Spill Response Coordinator** to report the spill and determine who else should be notified.
- The **Spill Response Coordinator** will call the **Emergency Response Contractor** listed in the ***Emergency Contacts*** list (Page i of this Plan), if necessary.
- The **Spill Response Coordinator** will contact the **EGLE** and the **National Response Center** (numbers shown on Page i of this Plan), if necessary.
- The **Spill Response Coordinator** will record the call on the *Historical Spill and Agency Notification Record* (APPENDIX A).
- The **Spill Response Coordinator** will coordinate cleanup and remediation following the spill, as required.

If the **Spill Response Coordinator** is not available at the time of the spill, the Senior **Environmental Operations Manager (or his/her designee)** will assume responsibility for Spill Response Coordinator activities.

Wastes resulting from a minor spill response will be collected in appropriate impervious containers. The **Spill Response Coordinator (or his/her designee)** will characterize the waste for proper disposal.

Wastes resulting from a major spill response will be removed and disposed of by a cleanup contractor in accordance with applicable regulatory requirements.

**A COPY OF THE INTEGRATED CONTINGENCY PLAN (ICP) IS MAINTAINED AT THE ADMINISTRATIVE OFFICES OF THE WCAA LOCATED in THE BERRY ADMINISTRATION BUILDING, BLDG. 602, DETROIT METROPOLITAN AIRPORT per 40 CFR 112.3(e)(1).**

# INTEGRATED CONTINGENCY PLAN CERTIFICATION

**FACILITY**

Detroit Metropolitan Wayne County Airport (DTW)
Wayne County Airport Authority (WCAA)
Department of Environment & Sustainability (E&S)
Berry Administration Building – Bldg. 602
11050 Rogell Drive
Detroit Metropolitan Airport
Detroit, Michigan 48242
(734) 942-3550

# FACILITY MANAGEMENT CERTIFICATION (40 CFR 112.7)

This Integrated Contingency Plan (ICP) [SPCC, PIPP, and SWPPP] will be implemented as described herein.

| | |
|---|---|
| Name: | James Cullen |
| Title: | WCAA Environmental Operations Manager – Department of Environment & Sustainability |
| Signature: | |
| Date: | December 31, 2021 |

## PROFESSIONAL ENGINEER CERTIFICATION STATEMENT (40 CFR 112.3(d))

By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 112, that I have visited and examined the facility, that this SPCC plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112, that procedures for required inspections and testing have been established and that this Plan is adequate for the facility.

Engineer: _____
(Print Name)

Signature: _____

Title: _____

Company: _____

Registration Number: _____ Date: _____

## CERTIFICATION OF THE SWPPP

I certify under penalty of law that this SWPPP has been developed in accordance with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. In addition, at the time this plan was completed, no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

_____ A-li: I-05937
(Certified Operator Signature) (Certification Number)

James Cullen
(Printed Name) (Date)

_____ _____
(Designated Authorized Signature) (Date)

Jacob O'Neil; Director - WCAA Department of Environment & Sustainability
(Printed Name) (Title)

A copy of this certification is to be retained with this Plan. The copy with the original signatures is to be submitted to the District EGLE office.

# CERTIFICATION OF APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA (40 CFR 112.3(d))

**CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST**

**FACILITY NAME:** **Detroit Metropolitan Wayne County Airport (Wayne County Airport Authority)**
**FACILITY ADDRESS:** **Detroit Metropolitan Airport, Berry Administration Building, Detroit, Michigan 48242**

1) Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes _____ No X

2) Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes _____ No X

3) Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the formula in Attachment C-III, APPENDIX C, 40 CFR 112 or a comparable formula[1]) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, APPENDIX E, 40 CFR 112 for availability) and the applicable Area Contingency Plan.

Yes _____ No X

4) Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula (Attachment C-III, 40 CFR 112 or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake[2]?

Yes _____ No X

5) Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes _____ No X

## CERTIFICATION

I certify that under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

James Cullen _____
*Name (please type or print)* *Signature*

WCAA Environmental Operations Manager – WCAA Department of Environment & Sustainability _____
*Title* *Date*

## INTEGRATED CONTINGENCY PLAN REVIEW SUMMARY

In accordance with 40 CFR 112.5 (b) A complete review and evaluation of the ***Spill Prevention, Control and Countermeasures (SPCC) Plan*** portion of this ***Integrated Contingency Plan (ICP)*** must be conducted at least once every five (5) years.

In accordance with the Michigan Part 5 Rules, a review and evaluation of the ***Pollution Incident Prevention Plan (PIPP)*** portion of this ***ICP*** must be conducted at least once every three (3) years.

In accordance with the requirements of Part I.A of Michigan's National Pollutant Discharge Elimination System (NPDES) Permit No. MI0036846 for stormwater discharges (originally issued with SWPPP requirements to DTW on May 1, 1998 and re-issued October 1, 2004, October 1, 2008, and February 1, 2015) a complete review and evaluation of the ***Stormwater Pollution Prevention Plan (SWPPP)*** portion of this ***ICP*** shall be conducted at least once a year.

In accordance with the Michigan Part 315, Dam Safety, a review and evaluation of the ***DTW Pond 6 Emergency Action Plan (EAP)*** portion of this ***ICP*** must be conducted at least once per year.

The ICP review documentation is recorded below.

| Reviewer (Sign) | Reviewer (Print) | Planning Requirements Reviewed: SPCC, PIPP, SWPPP, or ALL) | Date | Comments (Will/Will Not Amend Plan?) | P.E. Certification |
|---|---|---|---|---|---|
| | Daniel A. Herrema, P.E. | SPCC | 12/15/06 | Will Not | No. 43824 |
| | Bryan C. Wagoner, P.E. | SWPPP | 9/8/08 | Will Not | No. 41051 |
| | Bryan C. Wagoner, P.E. | SPCC & SWPPP | 02/01/13 | Will | No. 41051 |
| | Bryan C. Wagoner, P.E. | SPCC, SWPPP, and EAP | 02/01/13 | Will | No. 41051 |
| | Bryan C. Wagoner, P.E. | SPCC, SWPPP, and EAP | 09/01/15 | Will | No. 41051 |
| | Bryan C. Wagoner, P.E. | SPCC, SWPPP, and EAP | 01/10/17 | Will Not | No. 41051 |
| | Bryan C. Wagoner, P.E. | SPCC, SWPPP, and EAP | 01/10/18 | Will Not | No. 41051 |
| | Bryan C. Wagoner, P.E. | SPCC, SWPPP, and EAP | 01/10/20 | Will | No. 41051 |
| | Bryan C. Wagoner, P.E. | SPCC | 11/30/20 | Will Not | No. 41051 |
| | James Power, C.M. | EAP | 11/30/20 | Will Not | N/A |
| | James Cullen | SWPPP | 11/30/20 | Will Not | N/A |
| | | | | | |
| | | | | | |

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## LIST OF ABBREVIATIONS

**ARFF** – Airfield Rescue and Firefighting Department

**ACS** – Apron Collection System

**ADF** – Aircraft Deicing Fluid

**API** – American Petroleum Institute

**AST** – Aboveground Storage Tank

**BMPs** – Best Management Practices

**BOD** – Biological Oxygen Demand

**CERCLA** – Comprehensive Environmental Response, Compensation, and Liability Act

**CFR** – Code of Federal Regulations

**DAL** Delta Air Lines

**DMRs** – Discharge Monitoring Reports

**DTW** – Detroit Metropolitan Airport

**DWTF** – Downriver Wastewater Treatment Facility

**EAP –** DTW Pond 6 Emergency Action Plan

**EGLE** – Michigan Department of Energy, Great Lakes, and Environment

**EPA** – Environmental Protection Agency

**FBO** – Fixed-Base Operator

**GLWA** – Great Lakes Water Authority Treatment Facility

**GSE** – Ground Support Equipment

**ICP** – Integrated Contingency Plan

**MPC** – Marine Pollution Control

**MSDS** – Material Safety Data Sheet

**NPDES** – National Pollutant Discharge Elimination System

**NRC** – National Response Center

**PDM**- Pavement Deicing Material

**PFAS**- Poly- and Per- Fluorinated Alkyl Substances

**PG** – Propylene Glycol

**PIPP** – Pollution Incident Prevention Plan

**POTW** – Publicly-Owned Treatment Works

**SADR** – Spent Aircraft Deicing Fluid Runoff

**SPCC** – Spill Prevention Control and Countermeasures

**STI** – Steel Tank Institute

**SWPPP** – Stormwater Pollution Prevention Plan

**UST** – Underground Storage Tank

**WCAA** – Wayne County Airport Authority

# 1.0 Introduction/Summary of Regulatory Requirements

Detroit Metropolitan Wayne County Airport (DTW) stores significant materials, including fuel and oil, in excess of regulated quantities, and therefore has developed a plan to prevent, contain, and respond to releases under the following regulations:

- Part 112 (Oil Pollution Prevention) Title 40, Code of Federal Regulations (40 CFR) – Spill Prevention Control and Countermeasure Plan (SPCC);
- Michigan Act 451 – NPDES Permit MI0036846 – Industrial Storm Water Pollution Prevention – Stormwater Pollution Prevention Plan (SWPPP);
- Michigan Part 5 Spillage of Oil and Polluting Materials Rules (MI Part 5) pursuant to Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451 - Pollution Incident Prevention Plan (PIPP);
- In addition, the DTW Stormwater Detention Pond 6 berms have been designated by the EGLE as a "High Hazard Potential Dam". An Emergency Action Plan (EAP) has been developed in accordance with Michigan Part 315, Dam Safety Act that describes procedures to be followed in the event of a failure of the Pond 6 berm.

This plan is an Integrated Contingency Plan (ICP) that consolidates the requirements of the four applicable regulations to provide one comprehensive spill prevention and response plan. The ICP contains a discussion of the regulatory requirements applicable to DTW and includes a matrix that lists the applicable regulatory requirements and indicates where that requirement is covered in this plan.

This ICP has been created to describe the procedures, methods, and equipment to be used at DTW to prevent oil, other polluting materials and hazardous waste from polluting surface and ground waters through spills, seepage, discharge, or runoff from DTW. Procedures to be followed if failure of the Pond 6 berm occurs are also included in this ICP.

A *DTW Site Location Map* (FIGURE 1) of the DTW area is included in the FIGURES Section of this ICP. The *DTW Buildings Map* (FIGURE 2), indicating locations of DTW and Tenant facilities is included in the FIGURES Section of this ICP. A *DTW Stormwater System Map* (FIGURE 3) is also included in the FIGURES Section of this ICP.

## Detroit Metropolitan Airport Integrated Contingency Plan

This Integrated Contingency Plan (ICP) for DTW was prepared in accordance with the following requirements:

- United States Environmental Protection Agency (EPA), pursuant to Code of Federal Regulations (CFR), 40 CFR Part 112, governing Spill Prevention Control and Countermeasure (SPCC) planning requirements; and
- U.S. EPA, pursuant to Code of Federal Regulations (CFR), 40 CFR Part 122-124, governing Stormwater Pollution Prevention Plan (SWPPP) requirements; and
- State of Michigan requirements of Part I. A of Michigan's National Pollutant Discharge Elimination System (NPDES) Permit No. MI0036846 for stormwater discharges [requiring an Industrial Stormwater Pollution Prevention Plan (SWPPP)]. *NPDES Permit No. MI0036846* is included in APPENDIX A; and
- State of Michigan General Rules Part 5, Spillage of Oil and Polluting Materials, enforced by the EGLE pursuant to Rules (R) 324.2001 to R 324.2009 governing Pollution Incident Prevention Plan (PIPP) requirements; and
- State of Michigan General Rules Part 315, Dam Safety Act governing measures to be taken if the DTW Pond 6 berm fails.

**NOTE: The SPCC/PIPP information contained in this ICP pertains to the storage and handling of oil and other polluting materials owned by WCAA only. The WCAA requires its tenants to comply with applicable local, state and federal regulations using lease language. As such, each tenant is responsible for development of a Spill Management Plan, SPCC and/or PIPP for its own oil and/or polluting material storage and handling operations, if applicable (APPENDIX N).**

### 1.1 SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

DTW exceeds the Federal 1,320-gallon oil storage threshold requiring the preparation of a Spill Prevention Control and Countermeasure Plan (SPCC) and the required elements of a DTW SPCC plan are included in this ICP.

This Integrated Contingency Plan contains the required elements of the DTW ***Spill Prevention Control and Countermeasure (SPCC) Plan*** that has been prepared in accordance with Part 112 (Oil Pollution Prevention) Title 40, Code of Federal Regulations (40 CFR) as revised and proposed to become effective November 10, 2010. The purpose of the SPCC Plan is to establish procedures, methods, equipment, and other measures to prevent the discharge of oil to navigable waters.

Required elements of SPCC plans include:

- A description of facility drainage systems;
- An inventory of all above and below ground oil containers containing 55-gallons or more;
- Spill response procedures and materials.

In accordance with 40 CFR 112.5 (b) A complete review and evaluation of the Spill Prevention, Control and Countermeasures (SPCC) Plan portion of this Integrated Contingency Plan (ICP) will be conducted at least once every five (5) years.

## 1.2 STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

This Integrated Contingency Plan contains the information required by National Pollutant Discharge Elimination System (NPDES) Permit No. MI0036846, Part I. A, +No. 10, issued to DTW by The Michigan Department of Environmental Energy, Great Lakes, and Environment (EGLE), for a ***Stormwater Pollution Prevention Plan (SWPPP)***. DTW is the sole-permittee covered by this permit. This permit is included in APPENDIX A.

The SWPPP elements of this ICP have been developed to:

- Describe the DTW facility;
- Identify existing and potential sources of significant materials[1] in DTW stormwater discharges;
- Describe best management practices (BMPs) to minimize the quantity of significant materials entrained in DTW stormwater discharges, including the use of both non-structural (preventative inspections, spill response procedures, employee training programs), and structural controls;
- Provide for periodic review of the SWPPP;
- Certify that stormwater discharged from DTW is not impacted by unauthorized non-stormwater discharges. A certification to this effect is included on Page vii of this ICP.

This SWPPP became effective May 1, 1999 and has been updated several times since then.

All Figures referenced in the SWPPP requirements are included in the *FIGURES* Section; Tables are included in the *TABLES* Section.

## 1.3 POLLUTION INCIDENT PREVENTION PLAN (PIPP)

Detroit Metropolitan Wayne County Airport is an on-land facility that stores oil and other polluting materials above threshold management quantities, and therefore is also required by the State of Michigan to maintain a Pollution Incident Prevention Plan (PIPP).

This Integrated Contingency Plan includes the required elements of the ***Pollution Incident Prevention Plan (PIPP)***, which has been prepared in accordance with the Michigan Part 5 Spillage of Oil and Polluting Materials (MI Part 5) rules pursuant to Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451 as revised effective August 31, 2001.

In accordance with the Michigan Part 5 Rules, a review and evaluation of the Pollution Incident Prevention Plan (PIPP) portion of this ICP must be conducted at least once every three (3) years.

[1] A significant material is defined by the State of Michigan as any material which could degrade or impair water Energy, Great Lakes, and Environment, including, but not limited to: raw materials; fuels; salt, solvents, detergents, and plastic pellets; finished materials, such as metallic products; hazardous substances designated under Section 101 (14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (See 40 CFR 372.65); any chemical the facility is required to report pursuant to Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA); polluting materials as identified under the Part 5 Rules (Rules 324.2001 through 324.2009 of the Michigan Administrative Code); Hazardous Wastes as defined in Part 111 of the Michigan Act; fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have the potential to be released with stormwater discharges.

## 1.4 POND 6 EMERGENCY ACTION PLAN

DTW Stormwater Detention Pond 6 has been designated by the EGLE as a High Hazard Potential Dam (Dam ID 2682) and is therefore regulated under Part 315 of the Dam Safety Act. Owners of High Hazard Potential dams are required to have a Professional Engineer, licensed in the State of Michigan, conduct an inspection of the dam once every three years. This inspection should include an evaluation of the dam's condition and structural integrity. Preparation of an Emergency Action Plan (EAP) is also required. The Pond 6 EAP is included as APPENDIX H of this ICP.

## 1.5 COMPLIANCE WITH APPLICABLE REQUIREMENTS

This section describes the various environmental regulations and associated permits that operations at DTW comply with.

### 1.5.1 SPCC

Facility drainage at DTW is designed to meet the requirements under 112.8(b)(3) to use ponds, lagoons, or catch basins to retain oil at the facility in the event of an uncontrolled discharge, as described in this ICP. The operational and emergency oil storage capacity of DTW's stormwater pump station wet-wells and detention ponds is sufficient to contain discharges of oil from WCAA and tenant-owned oil tanks, drums, and handling equipment and prevent a discharge to navigable waters.

### 1.5.2 SWPPP / PIPP – Non-Stormwater Allowed Discharges

All existing non-stormwater discharges that currently occur at DTW are authorized by NPDES Permit No. MI0036846 (APPENDIX A). Unauthorized stormwater discharges are prevented using one or a combination of the following steps:

- Facility site inspections;
- Interview with facility maintenance personnel;
- Review of facility storm drain piping schematics;
- Dye test of facility floor drains and/or plumbing fixtures.

Non-stormwater discharges occurring at DTW which are authorized by Part I.A.10.j of the DTW NPDES permit include the following: fire-fighting activities, hydrant flushing, air conditioning condensate discharges, and foundation or footing drain discharges. Except for occasional fire-fighting activities, stormwater at DTW is not impacted by the above non-stormwater discharges.

Certification of the absence of unauthorized non-stormwater discharges is located on Page vii of this ICP.

### 1.5.3 Underground Storage Tank (UST) / Aboveground Storage Tank (AST) Regulations

All USTs owned by the WCAA and in operation of DTW are properly registered with the State of Michigan and are equipped with appropriate leak detection and overfill protection. ASTs at DTW are not required to be registered but all annual inspection fees are paid and all necessary overfill protection is in place and functional.

## 1.6 COMPLIANCE MATRIX

This Integrated Contingency Plan (ICP) document addresses the regulatory requirements associated with the SPCC, PIPP, and SWPPP in place at DTW. The matrix included in this section identifies specific individual plan elements and indicates the section and page number where these elements can be located within this ICP.

The matrix below, *REGULATORY REFERENCE TABLE – SPCC, PIPP & SWPPP REQUIREMENTS* outlines the requirements for the DTW SPCC, PIPP, and SWPPP plans, respectively. SPCC Regulatory Reference notes the Federal Register; SWPPP Regulatory Reference notes National Permit Discharge Elimination System Permit No. MI 0036846; PIPP Regulatory Reference notes the Michigan Statute Administrative Rules.

**REGULATORY REFERENCE TABLE – SPCC, PIPP, & SWPPP REQUIREMENTS**

| ***SPCC REQUIREMENTS*** | | | |
|---|---|---|---|
| **Requirement** | **Regulatory Reference** | **Report Section** | **Page** |
| Certification | 40 CFR 112.3(d) | - | vi |
| SPCC plan amendment | 40 CFR 112.4(a-f) and 112.5(a-c) | 3.6 | 3.4, 3.5 |
| SPCC plan review | 40 CFR 112.5(b) | 3.6 | 3.4, 3.5 |
| SPCC evaluation log | 40 CFR 112.5(b) | - | viii |
| Management approval | 40 CFR 112.7 | - | iv |
| Conformance with 40 CFR 112.7 | 40 CFR 112.7(a)(1) | 1.4 | 1.4 |
| Deviation from applicable requirements of 40 CFR 112.7 | 40 CFR 112.7(a)(2) | 1.4 | 1.4 |
| Facility information | 40 CFR 112.7(a)(3) | 4.0 | 4.1 |
| Facility description | 40 CFR 112.7(a)(3) | 4.1 | 4.1 |
| Bulk storage tanks | 40 CFR 112.7(a)(3)(i) | 6.4 | 6.3 |
| Discharge prevention measures | 40 CFR 112.7(a)(3)(ii) | 5.0 | 5.1 |
| Discharge controls | 40 CFR 112.7(a)(3)(iii) | 5.0 | 5.1 |
| Countermeasures | 40 CFR 112.7(a)(3)(iv) | 3.2 | 3.1 |
| Methods of disposal | 40 CFR 112.7(a)(3)(v) | 3.2.4 | 3.4 |
| Contact list | 40 CFR 112.7(a)(3)(vi) | - | I |
| Discharge reporting procedures | 40 CFR 112.7(a)(4) | 3.4 | 3.4 |
| Readily usable emergency response procedures | 40 CFR 112.7(a)(5) | 3.0 | 3.1 |
| Potential spill predictions, volumes, rates and controls | 40 CFR 112.7(b) | 7.1 | 7.1 |
| Containment and diversionary structures | 40 CFR 112.7(c)(1)(i-vi) | 7.3 | 7.1 |
| Location of spill response equipment | 40 CFR 112.7(c)(1)(vii) | 3.2 | 3.3 |
| Secondary containment systems | 40 CFR 112.7(c)(1)(i) | 5.3 | 5.3 |
| Demonstration of practicability | 40 CFR 112.7(d) | 7.6 | 7.2 |
| Inspections and records | 40 CFR 112.7(e) | 2.2 | 2.2 |
| Training | 40 CFR 112.7(f)(1-3) | 5.2 | 5.2 |
| Personnel instructions | 40 CFR 112.7(f)(1) | 5.2 | 5.2 |

| *SPCC REQUIREMENTS (CONTINUED)* | | | |
|---|---|---|---|
| **Requirement** | **Regulatory Reference** | **Report Section** | **Page** |
| Designated person accountable for spill prevention | 40 CFR 112.7(f)(2) | 2 | 2.1 |
| Spill prevention briefings | 40 CFR 112.7(f)(3) | 5.2 | 5.2 |
| Security | 40 CFR 112.7(g)(1-5) | 4.1.3 | 4.2 |
| Fencing | 40 CFR 112.7(g)(1) | 4.1.4 | 4.2 |
| Flow valves locked | 40 CFR 112.7(g)(2) | Not Applicable to DTW | |
| Starter controls locked | 40 CFR 112.7(g)(3) | Not Applicable to DTW | |
| Pipeline loading/unloading connections securely capped | 40 CFR 112.7(g)(4) | Not Applicable to DTW | |
| Lighting | 40 CFR 112.7(g)(5) | 4.1.2 | 4.2 |
| Facility tank car and truck loading/unloading operations | 40 CFR 112.7(h)(1-3) | 6.4.1 | 6.5 |
| Secondary containment in tank truck unloading areas | 40 CFR 112.7(h)(1) | 6.4.1 | 6.5 |
| Warning system for tank truck unloading | 40 CFR 112.7(h)(2) | 6.4.1 | 6.5 |
| Examination of tank trucks following unloading | 40 CFR 112.7(h)(3) | 6.4.1 | 6.5 |
| Above ground Inspection | 40 CFR 112.7(i) | 6.4 | 6.3 |
| Compliance with applicable state requirements | 40 CFR 112.7(j) | 1.4 | 1.4 |
| Qualified oil-filled operational equipment | 40 CFR 112.7(k) | 7.9 | 7.3 |
| Conformance with general requirements | 40 CFR 112.8(a) | 1.4 | 1.4 |
| Facility drainage | 40 CFR 112.8(b)(1.5) | 4.4 | 4.4 |
| Drainage from diked storage areas | 40 CFR 112.8(b)(1) | 7.3.4 | 7.2 |
| Valves used on diked storage areas | 40 CFR 112.8(b)(2) | 7.3.4 | 7.2 |
| Plant drainage systems from undiked areas | 40 CFR 112.8(b)(3) | 7.12 | 7.4 |
| Final discharge of drainage | 40 CFR 112.8(b)(4) | 7.13 | 7.4 |
| Facility drainage systems and equipment | 40 CFR 112.8(b)(5) | 7.14 | 7.4 |
| Bulk storage containers | 40 CFR 112.8(c)(1-11) | 6.0 | 6.3 |
| Tank compatibility with contents | 40 CFR 112.8(c)(1) | 7.8.4 | 7.3 |
| Aboveground storage tanks | 40 CFR 112.8(c)(2) | 6.4.1 | 6.3 |
| Precipitation drainage | 40 CFR 112.8(c)(3)(i-iv) | 7.7 | 7.2 |
| Underground storage tanks | 40 CFR 112.8(c)(4) | 6.4.2 | 6.6 |
| Partially buried storage tanks | 40 CFR 112.8(c)(5) | 7.8.1 | 7.2 |
| Aboveground storage tank periodic integrity testing | 40 CFR 112.8(c)(6) | 6.4.1 | 6.3 |
| Control of leakage through defective heating coils | 40 CFR 112.8(c)(7) | 7.8.2 | 7.2 |
| Tank installation fail safe engineering | 40 CFR 112.8(c)(8) | 7.8.3 | 7.3 |

| *SPCC REQUIREMENTS (CONTINUED)* | | | |
|---|---|---|---|
| **Requirement** | **Regulatory Reference** | **Report Section** | **Page** |
| Inspection of effluent treatment facilities | 40 CFR 112.8(c)(9) | 4.4.3 | 4.5 |
| Visible discharges | 40 CFR 112.8(c)(10) | 7.8.6 | 7.3 |
| Appropriate position of mobile or portable oil storage tanks | 40 CFR 112.8(c)(11) | 6.4 | 6.3 |
| Facility transfer operations | 40 CFR 112.8(d)(1-5) | 7.11 | 7.3 |
| Buried piping installation, protection, and examination | 40 CFR 112.8(d)(1) | 7.11.1 | 7.3 |
| Not in service and standby service terminal connections | 40 CFR 112.8(d)(2) | 7.11.2 | 7.4 |
| Pipe support design | 40 CFR 112.8(d)(3) | 7.11.3 | 7.4 |
| Aboveground valve and pipeline examination | 40 CFR 112.8(d)(4) | 7.11.4 | 7.4 |
| Aboveground piping protection from vehicular traffic | 40 CFR 112.8(d)(5) | 7.11.5 | 7.4 |
| *SWPPP REQUIREMENTS* | | | |
| **Requirement** | **Regulatory Reference** | **Report Section** | **Page** |
| Site Map | Section 1.a. | FIGURES 1, 2, and 3 | |
| Significant polluting materials | Section 1.b.1)-2). | 6.0 | 6.1 |
| Discharge points | Section 1.b.3) | 4.4 | 4.4 |
| Significant spills & leaks – past 3 years | Section 1.c. | 3.1 | 3.1 |
| Stormwater discharge sampling data | Section 1.d. | 3.5 | 3.4 |
| Preventative maintenance program | Section 2.a. | 6.6 | 6.8 |
| Comprehensive site inspection | Section 2.b. | 2.2 | 2.2 |
| Good housekeeping procedures | Section 2.c. | 5.1.1 | 5.1 |
| Material handling & storage procedures | Section 2.d. | 6.0 | 6.1 |
| Areas of soil erosion | Section 2.e. | 6.10 | 6.9 |
| Employee training | Section 2.d. | 5.2 | 5.2 |
| Significant material in stormwater | Section 2.f. | 6.0 | 6.1 |
| Structural controls | Section 3 1)-2). | 4.4 | 5.3 |
| Keeping plans current | Section 4. a.-e. | 3.6 | 3.4 |
| Record keeping | Section 5 | 2.2 | 2.2 |
| *PIPP REQUIREMENTS* | | | |
| **Requirement** | **Regulatory Reference** | **Report Section** | **Page** |
| Spill prevention and control coordinator | R 324.2006 (1)(a) | 2.0 | 2.1 |
| Facility information | R 324.2006 (1)(a) | 4.0 | 4.1 |
| Facility diagram | R 324.2006 (1)(a), (1)(e) | FIGURES 1, 2, and 3 | |
| 24-hour emergency notification numbers | R 324.2006 (1)(b) | - | I |
| Containment and diversionary structures, including spill response | R 324.2006 (1)(c)(i) | 7.3 | 7.1 |
| Storage inventory | R 324.2006 (1)(d) | 6.0 | 6.1 |
| Storage tank information | R 324.2006 (1)(d) | 6.4 | 6.3 |

| *PIPP REQUIREMENTS (CONTINUED)* | | | |
|---|---|---|---|
| Secondary containment | R 324.2006 (1)(f) | 5.3 | 5.3 |
| Precipitation management | R 324.2006 (1)(f)(v) | 7.7 | 7.2 |
| Spill control and cleanup procedures | R 324.2006 (1)(c) | 3.2 | 3.1 |
| Inspections and record keeping | R 324.2006 (1)(f)(vi) | 2.2 | 2.2 |
| Security | R 324.2006 (1)(f)(vi), (1)(h) | 4.1.3 | 4.2 |
| Review and amendments | R 324.2006 (4) | 3.6 | 3.4 |
| ***EAP REQUIREMENTS*** | | | |
| **Requirement** | **Regulatory Reference** | **Report Section** | **Page** |
| Conduct periodic berm inspections | Michigan Part 315 Rules | 1.4 | 1.4 |
| Prepare an Emergency Action Plan | Michigan Part 315 Rules | 1.4 | 1.4 |

# 2.0 Plan Implementation

## 2.1 DTW STORM WATER POLLUTION PREVENTION TEAM

The DTW Stormwater Pollution Prevention Team is responsible for implementing, maintaining, and revising the SWPPP. The members of the team are familiar with the operation and management of the stormwater system at DTW. Team members are:

*DTW STORMWATER POLLUTION PREVENTION TEAM*

- James Cullen, Environmental Operations Manager, Spill Response Coordinator
  Detroit Metropolitan Wayne County Airport
  Berry Administration Building
  Detroit, Michigan 48242
  (734) 942-3748

- Matt Bell, PE, Deputy Director – WCAA Department of Environment & Sustainability, Alternate Spill Response Coordinator
  Detroit Metropolitan Wayne County Airport
  Berry Administration Building
  Detroit, Michigan 48242
  (734) 247-7370

- Clay McSparin, Senior Environmental Program Specialist
  Detroit Metropolitan Wayne County Airport
  Berry Administration Building
  Detroit, Michigan 48242
  (734) 247-3621

- James Wadsworth, Senior Environmental Program Specialist
  Detroit Metropolitan Wayne County Airport
  Berry Administration Building
  Detroit, Michigan 48242
  (734) 247-7216

- Abraham Fiolek, Environmental Program Specialist
  Detroit Metropolitan Wayne County Airport
  Berry Administration Building
  Detroit, Michigan 48242
  (734) 247-2816

## 2.2 INSPECTIONS AND RECORDS

Inspections required under the three elements of this ICP are summarized in the *DTW Quarterly Comprehensive Facility Inspection Form* (TABLE A). These inspections are documented the Environmental Field Notebook when they occur in, a hardbound lined-paper book that is always carried and in which all observations made by WCAA E&S staff. It is stored in the E&S office during off-hours and copies of

individual pages are made weekly and archived in a separate storage location. All records collected because of this ICP are maintained for seven (7) years, unless otherwise indicated.

## 2.3 PLAN AVAILABILITY

This Integrated Contingency Plan is not required to be filed with any regulatory agency; however, a copy is available for on-site review, inspection and copying by agency representatives during regular business hours. The ICP Plan will be submitted to the US EPA Region 5 Regional Administrator (RA) and the Michigan Department of Environmental Energy, Great Lakes, and Environment (EGLE) upon request. A written notification of update of the PIPP and certification that the facility complies with the Part 5 rules is submitted to the EGLE District office every three (3) years.

The Integrated Contingency Plan will be reviewed annually, and if either of the following occurs:

1. The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the United States in a single spill event; OR
2. The facility discharges oil into or upon the navigable waters of the United States in quantities greater than 42 gallons in each of two (2) separate spill events within any twelve-month period.

The following information will be submitted to the EPA Regional Administrator and EGLE within 60 days if either of the above thresholds is reached, in accordance with 112.4(a):

1. Facility name.
2. Name of individual submitting information.
3. Facility location.
4. Maximum storage/handling capacity of the facility, including normal daily throughput.
5. Corrective actions and countermeasures taken, including descriptions of any equipment repairs or replacements.
6. A description of the facility, including maps as necessary.
7. An analysis of the cause of such spill(s).
8. Descriptions of additional preventative measures taken to minimize the possibility of recurrence.
9. Any other such information as may be reasonably required by the RA or EGLE.

## 2.4 LOCATION OF ICP PLAN

A complete copy of this ICP is maintained in the WCAA Administration Offices located in the Berry Administration Building at Detroit Metropolitan Wayne County Airport.

# 3.0 Spill Notification & Response Procedures

## 3.1 SPILL EXPERIENCE/HISTORY

Spills of significant materials at DTW are responded to by the WCAA Air Rescue and Fire Fighting Department (AARF). The AARF Department maintains records for all spill responses; this record for spills occurring between January 2019 and November 2022 is included in *DTW Spill/Release Reports* (APPENDIX B). A spill reporting form is provided in *EGLE Generic Spill or Response Form* (APPENDIX C). As of January 10, 2023, no spills of any unpermitted significant materials originating at DTW have reached navigable waters during the past three years.

The *EGLE Generic Spill or Response Form* (APPENDIX C) includes the following information:

- Date and location of spill incident; time/duration of release; identification of material spilled;
- Surface or groundwaters reached, if any;
- Description of incident, cause, and amount of material released;
- Description of any injuries or deaths;
- Response actions taken, quantity of material recovered, and disposal information;
- Assessment of actual or potential hazards to human health.

Follow-up regulatory agency correspondence regarding releases is included in *DTW Regulatory Release Correspondence* (APPENDIX D).

## 3.2 COUNTERMEASURES FOR DISCHARGE DISCOVERY, RESPONSE, AND CLEANUP

This section describes the response and cleanup procedures to be followed in the event of an oil spill. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by State and Federal laws. Immediate action must be taken to control, contain, and recover discharged product. In general, the following steps are taken:

- If possible and safe to do so, identify and shut down source of the spill;
- Eliminate potential spark sources;
- Contain the spill with sorbents, berms, trenches, sandbags, or other material;
- Contact the DTW Airfield Rescue and Fire Fighting Department (24-hour) at 911/734-942-3600 if the spill is greater than 5 gallons or if the spill reaches the DTW stormwater system;
- Contact the DTW Spill Response Coordinator;
- Contact an emergency response company, if necessary;
- Collect and dispose of recovered products according to applicable regulations.

### 3.2.1 Minor Spill Response

A “minor” spill is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product spilled is small (e.g., may involve less than 5 gallons of oil);
- Spilled material is easily contained and controlled at the time of the discharge;
- The spill is localized near the source;
- The spilled material is not likely to reach the stormwater system;
- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

WCAA personnel can usually address minor spills. The following guidelines apply:

- Immediately notify the WCAA Supervisor on duty in the Department involved;
- Under direction of the Supervisor, contain the spill with appropriate response materials and equipment. Place spill-cleanup debris in properly labeled waste containers;
- Notify the Spill Response Coordinator if there are questions regarding the spill following clean up.

### 3.2.2 Major Spill Response

A “major” spill is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The spill is large enough to spread beyond the immediate spill area;
- The spilled material enters on-site stormsewers;
- The spill requires special equipment or training to clean up;
- The spilled material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major spill, the following guidelines apply:

- All workers must immediately evacuate the spill site and move to a safe distance.
- The Supervisor on duty must immediately call 911. The resulting ARFF response will involve:
  - An Incident Commander will take charge of the overall incident;
  - Hydrant fueling systems will be shut down if necessary;
  - All sources of ignition will be shut off if the spill is flammable;
  - ARFF staff trained in hazardous material spill response and/or the Incident Commander will notify the Western Wayne County Hazardous Incident Response Team or Downriver Emergency Response Team, if indicated.
  - Drains will be plugged, if necessary;
  - ARFF personnel will remain on site until this spill has been cleaned up and the site is safe.
- Following the 911 call, additional notifications may be necessary. For example, if large quantities of oil reach a sanitary sewer, the Downriver Wastewater Treatment Facility should be notified immediately. A discharge that threatens DTW detention pond system requires immediate notification of the Wayne County Bridges Division to de-energize the affected pumpstation if possible. The DTW Spill Response Coordinator and/or the WCAA AARF Incident Commander will make these notifications.
- The Spill Response Coordinator will call the spill response and cleanup contractors listed in the Emergency Contacts list (Page i of this Plan), if necessary.
- The Spill Response Coordinator will contact the EGLE and the National Response Center (numbers shown on Page i of this Plan), if necessary.
- The Spill Response Coordinator will record the call on the *EGLE Generic Spill or Response Form* (APPENDIX C).
- The Spill Response Coordinator will coordinate any remediation activities following the spill.

If the Spill Response Coordinator is not available at the time of the discharge, the Environmental Operations Manager will assume responsibility for coordinating response activities.

Wastes resulting from a minor discharge response will be collected in appropriate impervious containers. The Spill Response Coordinator will characterize the waste for proper disposal.

Wastes resulting from a major discharge response will be removed and disposed of by a cleanup contractor in accordance with applicable regulatory requirements.

### 3.2.3 Spill Cleanup Response Materials

- **Spill Kits**: Dedicated spill kits are located in designated areas as shown on the *DTW Stormwater System Map* (FIGURE 3). Spill kit materials include: oil sorbent pads and socks, and bags of granulated spill sorbent material. These materials can be rapidly deployed in the event of a leak or spill to prevent the spill from spreading.
- **Booms:** Oil absorbent booms of various types and lengths are maintained at numerous locations on the DTW airfield as shown on the *DTW Stormwater System Map* (FIGURE 3).
- **Catchbasin Covers**: DTW AARF Department and E&S vehicles are equipped with appropriately-sized catch basin inserts/covers that can be quickly deployed to prevent spills from entering stormsewer catchbasins. Covers are also staged at all DTW vehicle fueling locations and are carried on the DTW Fuel Truck.

### 3.2.4 Disposal of Used Sorbent Materials

Use sorbent materials are to be placed in appropriate containers, labeled, characterized and disposed of in accordance with applicable, federal, state and local regulations.

## 3.3 CLEAN-UP CONTRACTORS

The WCAA maintains contracts with several environmental clean-up contractors. Contact information for these contractors is provided on Page i of this ICP. These contractors have the necessary equipment to respond to major spills, including floating booms, oil skimmers and pumps.

## 3.4 REPORTING / CORRESPONDENCE

Significant spills that impact soil or surface waters may need to be reported to one or more regulatory agencies. **The Spill Response Coordinator**, or his Designee, will make the appropriate report(s) to the proper regulatory agencies within the required period following the incident. The Spill Response Coordinator will also prepare and send the necessary follow up letters and reports following a reportable incident.

Copies of correspondence between the WCAA and various regulatory agencies regarding spills or releases from DTW are included in *DTW Regulatory Release Correspondence* (APPENDIX D).

Contact information for reporting a discharge to the appropriate authorities is listed on Page i of this Plan. For the SPCC element of the ICP, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities whenever the facility discharges (as defined in 40 CFR 112.1(b)) more than 1,000 gallons of oil in a single event, or discharges (as defined in 40 CFR 112.1(b)) more than 42 gallons of oil in each of two discharge incidents to navigable waters within a 12-month period.

## 3.5 SUMMARY OF AVAILABLE SAMPLING DATA

All DTW stormwater discharges are sampled and analyzed in accordance with the Airport's NPDES permit. All stormwater monitoring data is submitted to the EGLE using Daily Monitoring Reports (DMRs). DMRs are available from the Spill Response Coordinator upon request.

## 3.6 REVIEW & REVISION OF PLAN(S)

### 3.6.1 Amendment of SPCC Plan by Regional Administrator

The owner or operator must submit facility information to the EPA Regional Administrator within 60 days of any discharge of 1,000 gallons of oil to navigable waters whenever, or within 60 days of two discharges of greater than 42 gallons of oil to navigable waters. The facility information must be submitted with a written description of the spill, corrective action taken, and plans for preventing recurrence. The EPA Regional Administrator may then require SPCC Plan amendments. Pertinent facility information follows in Section 4.0.

### 3.6.2 Amendment of SPCC/PIP Plan By Owners Or Operators

The SPCC Plan will be amended whenever there is a change in facility design, construction, operation or maintenance, which materially increases the potential for discharge of oil to navigable waters. Such technical amendments shall be incorporated as soon as possible, but not later than six (6) months after such change occurs. Amendments shall be implemented no later than six (6) months following incorporation of the amendment. All technical amendments must be certified by a P.E. in accordance with 40 CFR 112.3.

A complete review and evaluation of the SPCC plan portion of this Plan must be conducted at least once every five (5) years. Documentation of plan review and amendments are included in the ***Integrated Contingency Plan Review Summary*** (Page viii) at the front of this Plan. Documentation shall include a summary of sections reviewed or amended, review date and the signature of the reviewer on a statement as to whether the SPCC Plan will be amended.

Administrative changes such as revised names and, telephone numbers should be noted directly on this ICP by the Spill Response Coordinator (with date and initials). Administrative changes do not require re-certification by a Professional Engineer.

The PIPP sections of this ICP must be evaluated every three (3) years or after any release that required implementation of the plan, whichever is more frequent. Submit only a written notification of update of the PIP Plan and a certification the facility is in complies with the Part 5 rules to the district office. A copy of the Plan is not required to be submitted unless requested to do so.

In accordance with Michigan Administrative Code R324.2007, within ten (10) days after the release of oil, salt, or polluting materials occurred, a written follow-up emergency notice report (Pollution Incident Report) shall be prepared detailing the incident and submitted to:

Michigan Department of Environmental Energy, Great Lakes, and Environment (EGLE)
Water Division (WD) Chief
PO Box 30273
Lansing, Michigan 48909-7773.

The written report shall be on company letterhead and include the cause of the release, details regarding the discovery of the release, response measures taken to remove the released material from the water of the state, and preventative measures taken to prevent recurrence.

# 4.0 FACILITY INFORMATION

Detroit Metropolitan Wayne County Airport (DTW)
Berry Administration Building
Detroit, Michigan 48242
Phone Number: (734) 942-3550

Facility Owner: The County of Wayne, Michigan.

Facility Operator / FAA Operating Certificate holder: The Wayne County Airport Authority

Designated person accountable for oil spill prevention and control, emergency procedures, reporting, record-keeping, and employee training:

| | |
|---|---|
| Environmental Operations Manager - Department of Environment & Sustainability: | James Cullen |
| Phone Number: | (734) 942-3748; cell (734) 968-2166 |
| Certified Stormwater Operator: | James Cullen |
| Certification Nos. | A-Ii: I-05937 |
| Standard Industrial Classification (SIC) Code: | 4581 |

Other Personnel: Approximately 160 Wayne County Airport Authority employees performing various activities related to maintenance, management and operation of the airfield.

## 4.1 LOCATION AND DESCRIPTION

Detroit Metropolitan Wayne County Airport (DTW) is located in the City of Romulus, Wayne County, Michigan. Interstate 94 borders the facility to the north, Eureka Road, Middlebelt Road and Vining Roads border the facility to the south, east, and west, respectively. Approximate coordinates are 83°21'12.213" longitude, 42°12'44.75" latitude. A *DTW Site Location Map* (FIGURE 1) is located in the *FIGURES* section of this ICP.

DTW is a full-service passenger and freight airfield, with associated facilities, servicing numerous major passenger, cargo, freight, and charter airlines.

The airport operates 24 hours a day, 7 days a week, with most of personnel being present between 5:00 AM and 11:00 PM. DTW Police, Maintenance, Airfield Operations, and Airport Rescue and Fire Fighting (ARFF) personnel are on duty continuously during DTW hours of operation. A site plan of the facility, indicating locations of operation for WCAA staff, as well as significant Airport tenants, is presented in DTW *Site Facilities/Building Map* (FIGURE 2).

The WCAA is responsible for the overall operation and maintenance of the Airport, including: building maintenance; runway and taxiway maintenance (including snow removal); public safety (Police and Fire); airfield security; and Airport administration. The Airport also acts as a lessor to numerous tenants, including major airlines, airline support companies (performing baggage handling, aircraft fueling and maintenance, etc.), car rental agencies, and federal agencies.

### 4.1.1 Physical Layout of the Facility

DTW is located on approximately 6,700 acres of land. Access to the facility is from Eureka Road from the south, Middlebelt Road from the east, or I-94 to the north.

The Facility consists of numerous buildings shown in the *DTW Site Facilities Map* (FIGURE 2). DTW's drainage sub basins, detention ponds, outfalls and primary storm sewers are shown in *DTW Stormwater System Map* (FIGURE 3). The locations where significant quantities of Oil and Polluting Materials are stored are also shown on FIGURE 3.

### 4.1.2 Lighting

Both pole-mounted and building-mounted lights illuminate most DTW facilities during hours of darkness. The lighting is sufficient to facilitate the discovery of spills or releases by WCAA personnel and Vendors/Tenants and to deter acts of vandalism.

### 4.1.3 Security

Security at DTW is strictly controlled. The airfield is fully fenced, with only authorized personnel having access. All emergency generators are in areas that are fully lit during the evening hours. All Maintenance Department building interiors are lit during normal hours of operation.

All WCAA-owned oil-storage areas at DTW are located inside buildings that are occupied at least eight hours per day, seven days a week, and are locked whenever they are unoccupied. Wayne County Airport Authority Police, Operations, and Security personnel regularly patrol all DTW property 24 hours per day, 365 days per year.

### 4.1.4 Fencing

DTW is enclosed by a ten-foot fence. Manned access points are guarded 24 hours a day by a staff of trained security guards. All visitors to DTW are required to check in at these manned access points.

## 4.2 WCAA ACTIVITIES OVERVIEW

The Wayne County Airport Authority is responsible for the following activities that could impact stormwater runoff quality at DTW:

- Fuel Storage
- Significant Material Storage
- Vehicle Maintenance
- Vehicle Fueling
- Vehicle/Equipment Cleaning
- Equipment Maintenance
- Sanitary / Storm Sewer System Maintenance
- Equipment Fueling
- Vehicle and Equipment Storage
- Runway/Taxiway Maintenance / Rubber Removal
- Building and Grounds Maintenance
- Pavement Deicing
- Pesticide/Herbicide Storage and Application
- Spent Aircraft Deicing Fluid Runoff (SADR) Management
- Fire Fighting

## 4.3 TENANTS FACILITIES & TENANT ACTIVITIES OVERVIEW

A list of significant tenants at DTW as of December 1, 2021 is presented in *DTW Tenant Facility List* (Appendix I). Tenant activities that have the highest potential for stormwater runoff contamination are:

- Aircraft Deicing/Anti-icing
- Aircraft Fueling
- Aircraft Washing
- Ground Vehicle Fueling
- Oil/Fuel Storage
- Deicing Chemical Storage
- Building and Grounds Maintenance
- Aircraft Maintenance
- Aircraft Lavatory Service
- Vehicle/Equipment Maintenance and Washing
- Vehicle/Equipment Storage
- Cargo Handling
- Significant Material Storage

## 4.4 SITE STORMWATER DRAINAGE

Stormwater at DTW is collected in a series of underground sewers and aboveground swales that flow to one of 13 pumpstations. These pumpstations convey water into one of three detention ponds equipped with outfall structures that when open, allow the ponds to be discharged to county drains near the Airport. The Frank and Poet Drain flows along the west, south, and east boundaries of the Airport and leaves the Airport to the east, flowing just south of Northline Road. The Sexton-Kilfoil drain leaves the Airport to the east, flowing just south of Goddard Road. These drains eventually discharge into the Detroit River. The *DTW Stormwater System Map* (FIGURE 3) indicates the various stormwater drainage areas at DTW and the locations of the Sexton-Kilfoil and the Frank and Poet Drains relative to the DTW airfield.

The DTW drainage sub-basins, detention ponds, outfalls, and trunk line storm sewer schematic are presented in FIGURE 3. Detention Pond specifications and detailed pond management procedures are contained in the *DTW Detention Pond Operations Manual* (APPENDIX G).

Pond 6 is the largest DTW Stormwater Detention Pond (216 million-gallons). The berm of Pond 6 is higher than six feet and has been designated by the EGLE as a High Hazard Potential Dam. Accordingly, Michigan Part 315 Rules require that an Emergency Management Plan be prepared to designate measures to be taken if seepage or impending berm failure is determined to be imminent. *The DTW Pond 6 Emergency Action Plan* (APPENDIX H).

### 4.4.1 Non-Deicing Stormwater Drainage

DTW stormwater generated in areas where aircraft deicing is not conducted flows to Pond 3E/4 and Pond 6. The total capacity of these two stormwater detention ponds is approximately 420 million-gallons. Outfalls 003A (Sexton-Kilfoil Drain) and 004A (Frank and Poet Drain) discharge stormwater collected in Detention Pond 3E/4 and Outfall 006A discharges stormwater collected Detention Pond 6 (Frank and Poet Drain). All DTW stormwater discharges through these outfalls are conducted in accordance with NPDES permit No. MI 0036846.

### 4.4.2 Stormwater Impacted with Deicing Materials

A third drainage area, the Apron Collection System (ACS), collects drainage from all aircraft gate areas, all remote deicing pads, and the FedEx and UPS ramps (deicing season only). Two (2) pump stations collect stormwater from these areas and convey it to Pond 3 West. During the winter, water in Pond 3W contains dilute concentrations of aircraft deicing fluid and is discharged through metered discharges to either the Downriver Wastewater Treatment Facility (DWTF) located in Wyandotte, Michigan under *Industrial Pretreatment NO. D-10914* (APPENDIX E) or the Great Lakes Water Authority Treatment Plant (GLWA) under *Wastewater Discharge Permit NO. 006-92742-IU* (APPENDIX F). During the summer, water in Pond 3W is released to Pond 3E/4, in compliance with NPDES Permit No. MI0036846.

Two smaller detention ponds collect dilute spent aircraft deicing fluid runoff (SADR) generated at the 3L and 4R remote deicing pads, located at the southern ends of runways 3L/21R and 4R/22L. Diversion valves control flow into these ponds. These valves are closed during the winter and direct stormwater generated to Ponds 3L and 4R. Ponds 3L and 4R are then dewatered to the ACS or discharged directly to the DWTF system. When the diversion valves to Ponds 3L and 4R are open, runoff is directed to the Pond 6. The Pond 3L and 4R diversion valves are closed, except during emergency flooding situations.

### 4.4.3 Facility Discharge or Drainage Prevention Measures and Controls

***Exterior Facility Areas***

DTW relies on several measures to aid in the prevention of significant material spills within the Facility property line. Spill prevention measures include secondary containment (double-walled tanks, concrete tank enclosures, spill pallets, etc.), supervision of load/unload operations, oil/water separators, routine inspections, and inventory tracking for vehicle fuels. The type and use of each prevention measure is discussed further in later sections of this ICP.

Discharge prevention measures also include the airport's detention pond system. All drainage from developed areas at DTW is contained in the Airport's 510-million-gallon detention pond system. These ponds are fed by 13 stormwater pumpstations (as shown on FIGURE 3). The design of each of these pumpstations incorporates a wet well that contains volumes of water large enough to afford a collection location for spilled significant materials, particularly oil-based materials.

It is unlikely, but possible, that spilled oil could be pumped into a stormwater detention pond through a pump station, particularly if an unreported discharge occurred during a large wet-weather event. However, all ponds are inspected daily, discharge from the bottom, and are not discharged during wet-weather events unless emergency conditions exist. Therefore, significant discharges of oil to one of these ponds would be readily identified and a pond discharge would not be initiated if oil was visible on the surface. Clean up using booms and/or skimmers would be conducted for large oil spills discovered on a DTW stormwater detention pond. The possibility that oil detained in a DTW stormwater pond could enter navigable waters is therefore considered highly unlikely.

***Interior Facility Areas***

Building floor drains in WCAA-owned facilities discharge to the Downriver Wastewater Treatment Facility (DWTF) in Wyandotte, Michigan. Floor drains in buildings where significant quantities of oil are stored are protected by oil/water separators as follows:

- Building 802, Fire Station #1, has a 100-gallon oil/water separator for floor drains.
- Building 703, Maintenance Trades Building, has a 15-gallon oil/water separator in the Electrical Shop for floor drains.
- Building 704, Maintenance Equipment Repair, has an 80-gallon separator for floor drains.
- The natural gas turbine at Building 611 (Powerhouse) is equipped with a 4,000-gallon oil/water separator.

These oil/water separators are inspected every three months and following significant spills of oil. Collected oil is removed of and disposed of properly, if necessary. Table A is used to record information regarding maintenance of these oil/water separators.

Oil that is stored or used inside WCAA-owned buildings in bulk tanks, 55-gallon drums or mobile containers is conducted such that any spillage from these sources would be contained in the following manner:

- Properly sized secondary containment structures;
- Spill-containment pallets;
- Spill kits.

# 5.0 Non-structural and Structural Controls

Non-structural and structural controls required by the SWPPP portion of this ICP are identified below:

## 5.1 NON-STRUCTURAL CONTROLS

Non-structural control measures are intended to minimize the contact between significant materials and stormwater by modifying existing practices and/or procedures.

### 5.1.1 General Good Housekeeping Programs

Good housekeeping practices are usually relatively inexpensive activities that can be performed by DTW employees or tenants to reduce the potential for stormwater contamination. The following Good Housekeeping practices are conducted at DTW:

- Maintaining uncluttered and clean-swept work areas that are exposed to stormwater runoff;
- Dedicated Spill Clean-Up Kits at several locations;
- Immediate cleanup of small spills and leaks;
- Placement of drip/catch pans at known or suspected leak locations;
- Inventory management practices for significant materials;
- Supervision of load/unload operations;
- Inspection and maintenance of the DTW stormwater system at least every six months;
- Periodic sweeping of paved parking and roadway areas;
- Appropriate pesticide/herbicide storage and application;
- Planting and maintenance of unpaved airport areas with grass and vegetative ground cover to prevent soil erosion;
- Employee training regarding stormwater pollution prevention.

### 5.1.2 Sanitary Sewage Lift Station Inspections

There are seven (7) sanitary sewage lift stations at DTW located in areas, that if they failed, could overflow to the stormwater system. These stations are shown on Figure 3. These facilities are equipped with alarms that send telephone alerts if wet-well levels are elevated or too low, if there is a power failure, or if there are electrical or mechanical problems with the pumps. The pump stations are also inspected once per week by the DTW Maintenance Department.

### 5.1.3 Tenant Facility Inspections

Significant tenant and DTW facilities are inspected by the WCAA E&S Department at least once every two (2) years. Smaller, less significant facilities are inspected less frequently. A list of tenants showing their inspection frequency is shown in the *DTW Tenant Facility List* (APPENDIX I) and the form(s) used during these inspections in included in the *DTW Tenant Facility Environmental Inspection Form* (TABLE B). Deficiencies are noted in writing and follow-up verification that corrections have been completed are verified. All data, including the dates of all inspections, is electronically recorded and stored in a dedicated E&S Department computer folder.

### 5.1.4 Comprehensive Quarterly Facility Inspections

NPDES Permit MI0036846 requires that Quarterly Comprehensive Site Inspections be conducted. These inspections are completed using the Standard Operating Procedure (SOP) and Inspection Form shown in *DTW Tenant Inspection SOP and Form* (Appendix J). Inspections that are conducted each quarter include all the tanks, oil/water separators, and drum storage areas noted in TABLE A.

### 5.1.5 Tenant Environmental Awareness Training

An interactive, web-based training program has been developed for WCAA employees, DTW tenants, and contractors working at DTW (www.wcaastormwatertraining.com). A short test is given following the test content and all the names of all personnel that pass the test is recorded. A hard-copy of this training is presented in *DTW and Tenant Stormwater Training Programs and Attendees* (APPENDIX K).

The topics covered during these training sessions include, but are not limited to:

- The difference between stormwater and sanitary sewers;
- Definition of elements of stormwater contamination (BOD, oil and grease, etc.);
- Typical sources of airport stormwater contamination;
- Measures (best management practices) employees can take to minimize stormwater contamination;
- Reporting procedures.

## 5.2 EMPLOYEE TRAINING

### 5.2.1 Personnel Training and Spill Prevention Procedures

WCAA personnel involved in vehicle operation and oil/fuel handling operations receive periodic instruction in the use of the spill prevention equipment that is in place at various DTW locations and, if necessary, in salt management procedures. DTW's Spill Response Coordinator is responsible for ensuring that all appropriate Wayne County Airport Authority employees are familiar with this ICP and that procedures, equipment, materials (including location of spill kits), and training are in place to prevent significant material spills at WCAA-operated facilities at DTW.

The primary methods that DTW employees obtain the training noted in this ICP is through mandatory one-on-one training for specific staff (e.g. – Maintenance Department large equipment operators) and web-based training modules. Classes that DTW employees may take include:

- Spill Prevention, Control, and Countermeasure Training;
- Hazardous Material Training;
- Class C Underground Storage Tank Operator Training.

The content of these training programs and a listing of the employees that have passed this training are included in *DTW and Tenant Stormwater Training Programs and Attendees* (APPENDIX K).

Numerous tenants also provide corporate stormwater training programs to their employees. Copies of the WCAA program and the list of employees that have taken the WCAA web-based training and tenant corporate training attendee lists provided to the WCAA are included in *DTW and Tenant Stormwater Training Programs and Attendees* (APPENDIX K).

## 5.3 STRUCTURAL CONTROLS

DTW relies on several structural controls to minimize the likelihood of a release of oil or other significant materials. These structural controls are detailed in previous and upcoming sections of this ICP and include:

- Sized secondary containment (double-walled tanks, concrete tank enclosures, spill pallets, etc.);
- The DTW stormwater detention pond system with associated pump stations and discharge structures;
- Catchbasin inserts;
- Oil/water separators;
- Shut-off valves;
- Over-fill alarms;
- Dedicated salt storage facility.

# 6.0 Significant Material Inventory & Management

This section of the Integrated Contingency Plan (ICP) describes where significant materials are stored and how they are used at DTW.

Potential sources of stormwater impact at DTW are limited to areas where industrial activities involving significant materials are performed outdoors. These include deicing and anti-icing activity and deicing material storage areas; fuel dispensing and storage areas; and equipment maintenance and washing areas. A description of these areas is provided in the sections below, along with an evaluation of the potential for significant material contact with stormwater in other areas at DTW. The areas described in this section are shown in *DTW Stormwater System Map* (FIGURE 3).

The *DTW Quarterly Comprehensive Facility Inspection Form* (TABLE A) summarizes the significant materials stored at DTW that have the greatest potential for encountering stormwater. Material Safety Data Sheets (MSDSs) for these significant materials are compiled in APPENDIX L.

## 6.1 AIRCRAFT DEICING

The principal material used to remove ice and snow from aircraft at DTW is Type I propylene glycol (PG)-based aircraft deicing fluid (ADF). Type I fluid is applied hot (~180 $^{o}$F), is relatively thin in viscosity, and melts snow and ice from aircraft control surfaces as it is applied. Most of applied Type I ADF drips to the ground beneath the aircraft immediately following application. After ice and snow have been removed using Type I ADF, thicker Type IV fluid is sometimes applied to protect aircraft control surfaces from refreezing. Type IV ADF used at DTW is also PG-based. Because it is thicker, Type IV ADF remains on aircraft surfaces until takeoff speed is attained. Both Type I and Type IV ADF are characterized by elevated BOD concentrations (>600,000 mg/L) and have the potential to impact stormwater Energy, Great Lakes, and Environment. Accordingly, these fluids must be managed carefully.

Aircraft deicing activities at DTW are exclusively conducted by airlines, airline subcontractors, and Fixed Base Operators (FBOs). More than 90% of these aircraft deicing and anti-icing activities are conducted using the DTW remote deicing pad system. Spent aircraft deicing runoff (SADR) collected at these pads containing propylene glycol (PG) concentrations greater than 2% is recycled to reclaim this component of the runoff. Non-recyclable pad runoff is conveyed to Pond 3W for subsequent discharge to the DWTF or the GLWA. Limited aircraft deicing is also conducted at terminal gate areas where all drainage also flows to Pond 3W. Deicing operations by Airport tenants located outside of the Apron Collection System (ACS; see Section 4.4.2) occur at two facility aprons where structural controls prevent deicing runoff from entering the DTW stormwater system. During the winter, runoff from these two facilities is either recycled or conveyed to Pond 3W.

Operation of the DTW remote pad system, including procedures associated with collecting and removing SADR from DTW is described in the *DTW Spent Aircraft Deicing Fluid Collection Operations Manual* (APPENDIX L). In addition, *NPDES Permit No. MI0036846* (APPENDIX A) requires the annual preparation of an annual Operations and Compliance (O&C) Plan. The three most recent O&C plans are provided in (APPENDIX N.)

Aircraft deicing/anti-icing materials are stored at several locations by airlines, FBOs, and airline subcontractors at DTW. Most of bulk 100% ADF is stored in aboveground storage tanks at each remote pad. These ASTs are filled by tank trucks. A small number of ASTs are used by airlines to store Aircraft Deicing Fluids (ADFs) at their facilities. ADF storage areas at DTW are summarized in the *DTW Quarterly Comprehensive Facility Inspection Form* (TABLE A), and their locations are also shown in FIGURE 3.

## 6.2 SNOW MANAGEMENT

Snow at DTW gate areas where aircraft deicing is conducted can become contaminated with ADF during and after heavy deicing events. Also, snow that falls on the remote deicing pads can be contaminated with ADF. Alternately, large quantities of snow remain uncontaminated during these events because the majority of aircraft deicing is conducted at remote deicing pads rather than at the gate. Consequently, DTW has developed a snow removal management process that involves hauling contaminated snow to storage/melting areas that drain to Pond 3W (which discharges to DWTF/GLWA) and hauling "clean" snow to areas that drain to either Pond 3E/4 or Pond 6 (which discharge to surface waters). When in doubt, drivers that haul snow deposit their loads in the contaminated storage areas.

## 6.3 PAVEMENT DEICING ACTIVITIES

This section describes the various pavement deicing materials used at DTW and the locations where they are stored.

### 6.3.1 Pavement Deicing Materials

The DTW Maintenance Department uses liquid potassium acetate as its primary pavement deicing material (PDM) on runways and taxiways. Sodium acetate pellets are used on parking ramps and roadways in the McNamara Terminal area and occasionally on runways and taxiways. Road salt is applied by the Maintenance Department to numerous landside roadways and parking lots. The management of road salt owned by the WCAA is covered in Section 6.3.2 of this ICP.

The WCAA stores liquid potassium acetate pavement deicing material (PDM) at its Maintenance Facility in two (2) 25,000-gallon above-ground fiberglass tanks that are contained within a concrete-block enclosure. A 21,000-gallon frac-tank is also used to store liquid potassium acetate at the Maintenance Facility site. Additional liquid PDM is stored in double-walled tanks on the 21R Deicing Pad in two 10,000-gallon and one 30,000 gallon above-ground tanks. Solid sodium acetate PDM is stored in one-ton bags by the WCAA Maintenance Department in Building 705 and by the WCAA Parking Lot contractor in Building 608.

### 6.3.2 Salt Storage

Approximately 500 tons of road salt is stored inside a covered salt storage building located behind Building 703. Additional salt is stored in Building 714. This salt is stored and managed in accordance with the *EGLE Salt and Brine Storage Manual* (APPENDIX O). All truck-loading operations are conducted on an impervious surface outside the building. Salt that is spilled during loading operations is immediately swept back into the building. Truck loading is not conducted during heavy runoff conditions. The salt dome and material storage areas are inspected at least once every three months by DTW E&S Staff.

## 6.4 PETROLEUM HYDROCARBON-BASED MATERIAL STORAGE

The WCAA stores and uses petroleum-based products for fueling and/or maintaining its inventory of vehicles and equipment. These products include: diesel fuel, unleaded gasoline, aviation gasoline, motor oils, waste oils, lubricating oils and greases, automatic transmission fluids, and hydraulic fluids. These materials, their containers, construction material, contents, volume, leak-detection and location are described in the *DTW Quarterly Comprehensive Facility Inspection Form* (TABLE A).

Gasoline and diesel vehicle fuels are stored in underground storage tanks (USTs). These tanks are registered under the State of Michigan's Underground Storage Tank Regulations (Part 211 of PA 451, 1992). The locations of these are shown USTs on FIGURE 3.

Aboveground storage tanks (ASTs) and drums comprise the remaining WCAA oil storage, which consists of diesel fuel for emergency generators, and virgin and waste oil of various types used by various WCAA Departments. The locations of these tanks are indicated on FIGURE 3.

Jet fuel is stored at DTW in a tank farm operated by Swissport, Inc., as discussed in Section 6.4.

If a spill reaches a stormwater catch basin, the responding WCAA personnel (ARFF or Operations Department) notify the WCAA Spill Response Coordinator. Following this notification, the potentially-affected pump station will be identified and monitored to determine if significant quantities of oil have subsequently collected in the wet well. If collectable quantities of oil are present and dry-weather is forecast, the affected pump station may be de-energized and clean up procedures may be conducted in the affected wet well.

### 6.4.1 Above Ground Storage Tanks (ASTs)

***Jet A Fuel Farm***

Swissport, Inc. operates a fuel farm that has six above-ground tanks with a combined capacity of approximately eight million-gallons of Jet A Fuel. This tank farm supplies fuel to the hydrant systems that serve the McNamara and North Terminals and the loading rack where FBO tank trucks are filled. This facility operates under its own Integrated Contingency Plan that requires periodic spill-response training programs. The WCAA participates in these training programs when notified by Swissport. The Facility Response Plan for this facility Response is included in *Tenant Spill Prevention Containment and Countermeasure (SPCC) Plans* APPENDIX O.

***Emergency Generator ASTs***

The WCAA owns and operates nine emergency electrical generators that are fueled with diesel fuel supplied from ASTs. Six of these generators are permanent installations to supply power to crucial equipment such as runway lighting systems and public safety facilities; and three are trailer-mounted portable units that supply on-site emergency power, as needed. These three generators have diesel ASTs contained within the trailer. One of these three trailer-mounted tanks is a single-walled steel tank. These tanks and their associated leak detection methods and containment systems are shown in the *DTW Quarterly Comprehensive Facility Inspection Form* (TABLE A).

The WCAA has determined that secondary containment is impracticable for the trailer-mounted, single-walled storage tank identified above because there is not sufficient space to accommodate containment within the trailer and a dike or berm with the required containment capacity around the trailer negates the ability for this unit to be portable. Other measures listed under §112.7(c) such as the use of sorbents would not be a reliable and effective means of secondary containment because the volumes involved may exceed the sorbent capacity.

Because secondary containment for this single-walled AST is impracticable, WCAA has provided in this Plan the additional elements required under 40 CFR 112.7(d), namely:

- Baseline integrity tests were performed on this tank on July 21, 2011. The results of this test indicate that this tank is in acceptable condition; however, some upgrades in the venting system are being evaluated.
- Establish a periodic integrity testing schedule according to baseline test recommendations.
- Quarterly Inspections.

***Virgin / Waste Oil Storage ASTs***

The majority of virgin motor oil, hydraulic fluid, and transmission fluid used by the WCAA is stored in Building 704, Equipment Repair, in five (5) 400-gallon steel ASTs with sized-steel secondary containment and in several 55-gallon drums that are stored on secondary containment pallets. In addition, waste oil is also stored in Building 704 in a 500-gallon double-walled steel tank that is equipped with a level indicator and an overfill protection alarm. It is emptied whenever the tank reaches 80% capacity. Waste oil generated at DTW facilities is properly disposed of using a licensed hauler. Manifests of waste oil shipments are retained in the DTW E&S Office.

There are also a small number of 55-gallon drums of oil in Building 705, Equipment Storage. These drums are stored on secondary containment pallets. The WCAA also owns and operates two (2) asphalt emulsion spreaders that are parked in Building 705 when not in use.

Oil storage in Buildings 704 and 705 is secondarily contained either using secondary containment pallets (for 55-gallon drums), double-walled steel tanks, or sized secondary containment (virgin oil tanks). Additionally, all floor drains in these facilities discharge to the Downriver Wastewater Treatment Facility through drains that are protected by oil/water separators. These separators are inspected quarterly and following significant spills. Oil is removed if significant quantities are observed. The possibility that oil spilled in these areas could reach waters of the State is therefore considered remote.

Between five (5) and eight (8) 55-gallon drums of oil are stored in the Powerhouse – Building 611 on secondary containment pallets.

Corrosion poses minimal risk of failure because drums are single-use and remain on site for a relatively short period of time (less than one year). These drum storage areas are regularly inspected by staff in these buildings, in accordance with accepted industry practice for drum storage which provides an effective means of verifying container integrity, as noted by EPA in the preamble to the SPCC rule at 67 FR 47120.

***WCAA Fuel Truck***

The Authority owns and operates a mobile refueling truck that contains 2,600 gallons of diesel fuel in a single tank. This vehicle is used to fuel generators, pumps, and other equipment used at various locations on the airfield. This vehicle is a licensed over-the-road vehicle, and is therefore covered by Department of Transportation, rather than SPCC regulations. However, oil-sorbent material is carried on this vehicle to address infrequent small spills that may occur during fueling operations and all personnel involved in fueling operations associated with this vehicle are familiar with the use and disposal of soiled sorbent material. This truck is inspected for leaks once per week and before each use. The truck is also parked in a designated location when not in use that is not near any stormwater catchbasins.

The WCAA-owned fuel tank truck is operated by staff that is trained in its proper operation. This training includes: checking the level of tank contents before commencing the filling process; monitoring tank levels during the filling process to safeguard against overfilling; and verifying that the tank truck automatic shutoff mechanism is functioning properly. In the event of a spill, operators are responsible for taking necessary mitigation and containment measures, and to notify the Spill Coordinator, if necessary.

The filling of the mobile gasoline and diesel tank truck is conducted at the WCAA fuel-island located at Building 703 and is monitored by Maintenance staff during all filling operations.

***AST Inspections / Periodic Integrity Testing***

Inspections of ASTs are conducted and documented once per quarter as shown in TABLE A. EPA's "*SPCC Guidance for Regional Inspectors"* states that "*for certain shop-built containers with a shell capacity of 30,000 gallons or under, EPA considers that visual inspection provides equivalent environmental protection when accompanied by certain additional actions to ensure that the containers are not in contact with soil*."

All WCAA fuel ASTs are shop-built and elevated (i.e., the tank bottoms are not in contact with the ground). Therefore, the visual inspections described previously, in addition to the spill prevention response capabilities of WCAA personnel, are deemed to be environmentally equivalent to integrity testing.

Non-destructive integrity evaluations are not performed on small saddle tanks or 55-gallon storage drums because: 1.) smaller saddle tanks are stored indoors, elevated off the ground and accordingly WCAA personnel can detect leakage from these ASTs during scheduled inspections; 2.) drums are elevated on spill pallets and have all sides visible, and facility personnel can detect leaks before significant spills occur.

***Appropriate Position of Mobile or Portable Oil Storage Tanks***

Active oil-containing drums are stored indoors on secondary containment pallets. Inactive drums are occasionally stored outdoors, in protected areas, for short periods of time while they await disposal or use. Drums stored outdoors are inspected at least once every three months. Spills associated with drum use are quickly contained and cleaned up using sorbent materials and appropriate cleaning products.

The two asphalt emulsion spreaders are filled at an off-site location and generally, all emulsion is used before the units are stored in Building 705. Spills of asphalt emulsion are unlikely; however, in the event asphalt emulsion leaks from one of these vehicles, it will be cleaned up using the same materials and notification protocols described previously in this plan.

The WCAA Fuel Truck is parked is parked overnight in a location that drains to a stormwater catchbasin that is protected with an insert that would prevent a large quantity of oil from passing through.

***AST Leak Detection / Overfill Protection***

All ASTs at DTW that contain more than 1,100-gallons of oil are registered with the State of Michigan and all required all annual inspection fees are paid. All tanks are equipped with required leak detection, overfill protection, and secondary containment.

### 6.4.2 Underground Storage Tanks (USTs)

All gasoline-containing USTs at DTW are filled by a vendor under contract to the WCAA. The liquid levels in these tanks are monitored daily and the tanks are filled accordingly. All filling operations of WCAA-owned USTs are monitored by WCAA personnel.

***Vehicle Fuel USTs***

The WCAA owns and operates two gasoline-containing USTs: one each at Buildings 703 and 802, and two diesel-containing USTs: one each at Buildings 703 and 802, all of which are used to fuel Authority-owned vehicles. Each of these tanks is covered by EGLE UST regulations. They are each equipped with leak-detection equipment that is monitored as shown in the *DTW Quarterly Comprehensive Facility Inspection Form* (TABLE A).

***Emergency Generator USTs***

The WCAA owns and operates two USTs that are used to store diesel fuel for emergency generators used during power outages. One is located near Building 611 (15,000 gallons) and is used to provide back-up fuel to the DTW Powerhouse Boilers and to run two emergency generators at that site; the second is located near Building 802 – Fire station 100 (1,000 gallons) and is used to fuel an emergency generator. The Building 802 UST is equipped with leak detection as shown in TABLE A.

***UST Registration / Staff Training***

All USTs owned by the WCAA and in operation at DTW are properly registered with the State of Michigan and are equipped with the appropriate leak detection and overfill protection. Quarterly inspections of the USTs are conducted by personnel that are appropriately trained as Class A, Class B, or Class C Operators.

## 6.5 AIRCRAFT AND GROUND VEHICLE FUELING ACTIVITIES

Aircraft at DTW are fueled via either a hydrant system or from tank trucks operated by airlines or FBOs. The DTW fuel hydrant system currently supplies Jet A to all McNamara and North Terminal gates, which comprise the majority of all aircraft fueling operations at DTW. The fueling hydrants are supplied via underground piping from the Swissport Jet A Fuel Farm and are all located within the ACS.

Jet fuel tank trucks are loaded at a covered fueling rack located directly east of Building 536 in the Pond 3E/4 Drainage Area. Drainage from this site flows to a dedicated storage tank that is regularly checked and pumped, if necessary. In addition, Guardian Industries maintains a jet fuel underground storage tank farms at Building 400, located in the Pond 6 Drainage Area. Tenant fueling operations are covered by dedicated SPCCs that are included in APPENDIX O.

Ground Support Equipment (GSE) fueling of Delta Airlines (DAL) vehicles is conducted at two facilities located, one each, at the north and south ends of the McNamara Terminal area. Drainage from these GSE sites flows through oil/water separators that discharge to Pond 6. There is also a GSE fueling station located at the north end of the North Terminal. Drainage from this area flows through an oil/water separator that discharges to Pond 3W. Other airline and tenant GSE fueling is performed by FBO tank trucks or from storage tanks located around the airfield.

The following fuel dispensing regulations apply for all on-site vehicle fuel dispensing and load/unload operations:

- No smoking
- Stop vehicle motor
- No dispensing of fuel into unapproved containers
- In case of fire or spill:
    - Use Emergency Stop
    - Report Emergency by calling (734) 942-3600
- Must have product identification visible
- Emergency Stop Switch location shall be identified and in clear view

## 6.6 AIRCRAFT, GROUND VEHICLE, AND EQUIPMENT MAINTENANCE ACTIVITIES

Major routine aircraft and vehicle maintenance at DTW is conducted indoors, where floor drains are connected to the sanitary sewer system. Minor maintenance activities are allowed on the ramp areas. These maintenance activities therefore present a minimal potential for stormwater runoff contamination.

### 6.6.1 Aircraft and Ground Vehicle Washing

Aircraft washing operations are minimal at DTW and generally take place indoors. Minor Outdoor washing is allowed on a “no soap” basis only. Washing operations at automobile rental agencies take place inside car wash facilities with floor drain connections to the sanitary sewers or a reclaim pit. All other ground vehicle washing is conducted off-site. Washing solvent chemicals are stored indoors. There is therefore minimal potential for stormwater contamination from these operations.

### 6.6.2 Aircraft Painting and Stripping

Aircraft stripping or painting operations are not performed at DTW. There is therefore no potential for material contamination of stormwater due to these operations at the Airport.

### 6.6.3 Aircraft Lavatory Service Operations

Lavatory servicing of aircraft is performed by commercial airlines, subcontractors or fixed base operators at the terminal ramp areas within the Apron Collection System (ACS) where aircraft lavatory tanks are discharged to a service tanker truck. These tankers are then emptied directly into the sanitary sewer system at one of two tritulators located within the ACS. All lav-truck spills or leaks are immediately removed from the pavement using cleanup materials stored on the servicing trucks. Aircraft lavatory service operations, if properly conducted, present little potential for stormwater runoff contamination.

## 6.7 BUILDING AND GROUNDS MAINTENANCE

Herbicide products are applied by the WCAA Maintenance Department to fence line and other areas at DTW to inhibit the growth of weeds. Approximately 100 2.5-gallon containers of liquid *Round-Up* herbicide, 10 gallons of liquid dandelion killer, 40lbs. of *SureGard* herbicide powder (mix with water), 50 lbs. of granular mosquito killer (mix with water) herbicide are stored in a dedicated, locked room in Building 705 that does not have floor drains.

As is the case at all major airports, the Airport Maintenance Department occasionally applies a biodegradable rubber remover on runway surfaces to maintain airfield safety. The remover/cleaner is stored indoors. Approximately eighty (80) 55-gallon drums of rubber removal compound are stored in Building 703 in a bermed, locked room with no floor drains. The compound contains sodium hydroxide which is listed under the Part 5 PIPP rules.

Relatively small quantities of this material are used during dry spring, summer, and fall periods and the majority of runoff associated with this activity percolates into soil areas adjacent to runways. The DTW Maintenance Department uses this material according to manufacturer's instructions and notifies the DTW E&S Department prior to rubber removal activities being conducted.

## 6.8 FIREFIGHTING OPERATIONS

Discharge of materials in stormwater runoff associated with firefighting operations is allowed by the NPDES permit and was therefore not evaluated as a potential source of stormwater pollution. Historic use of PFAS-containing fire-fighting foams, required by the Federal Aviation Administration, is the focus of several current investigations at DTW. Approximately 6,000-gallons of PFAS-containing firefighting foam is stored at Fire Station 100 and in the various firefighting vehicles staged at the three DTW fire stations.

## 6.9 MANAGEMENT OF SOIL EROSION

Best management practices for soil erosion control at DTW include the following:

- Planting and maintenance of unpaved Airport areas with grass or other vegetative ground cover to prevent the exposure of soil to the elements.
- Preparation of, and adherence to Construction SWPPPs for Airport construction projects that involve disturbance of greater than one acre and compliance with Wayne County Soil Erosion Permits that address soil erosion.
- Detention of stormwater prior to discharge to facilitate settling.

# 7.0 Additional SPCC Requirements

## 7.1 POTENTIAL FOR EQUIPMENT FAILURE

For exterior oil storage, discharges due to equipment failure or operator error would be directed to storm water catch basins that are routed to DTW's detention basins. For interior oil storage, any discharge due to a leak would be directed to floor drains, which are connected to the sanitary sewer system. Spill response capabilities, as well as secondary containment measures are in place to address these potential scenarios, and are described further in other sections of this ICP.

## 7.2 EXCEPTIONS

Sized secondary containment is deemed impracticable for the two single-walled generator tanks located in Trailer #1 and the Trailer west of Building 705. To address this impracticability, the WCAA has included the following elements into this ICP:

- Perform baseline integrity test by November 10, 2010;
- Establish periodic integrity testing schedule for these containers according to baseline test recommendations; and;
- Prepare an Oil Spill Contingency Plan per the provisions of 40 CFR 109 (APPENDIX P) that includes a written commitment of manpower, equipment, and materials required to expeditiously control and remove discharged oil that may be harmful.

## 7.3 CONTAINMENT AND DIVERSIONARY STRUCTURES

The facility uses several different types of preventative systems to contain oil and polluting material and prevent discharges from reaching the DTW stormwater system. The *DTW Quarterly Comprehensive Facility Inspection Form* (TABLE A), presents specific information on the storage tanks including capacity, material stored, and method of secondary containment, if applicable.

### 7.3.1 Dikes and Berms

The facility utilizes containment structures and devices including dikes and berms. For specific application and tank information, see the *DTW Quarterly Comprehensive Facility Inspection Form* (TABLE A).

### 7.3.2 Curbing

The facility does not employ curbing as a containment mechanism.

### 7.3.3 Weirs, Booms or Other Barriers

Additional containment structures include concrete building walls for various storage totes and drum areas to prevent the migration of spills. Discharge from each of the Airport's stormwater detention ponds is controlled by manually-operated valves/sluice gates that can be shut off. Booms are available for placement on the ponds.

### 7.3.4 Valves Used on Diked Storage Areas

See *Drainage from Diked Storage Areas* (Section 7.3.1), above.

## 7.4 CONTAINMENT STRUCTURES FOR OFFSHORE FACILITIES

Detroit Metropolitan Wayne County Airport is not considered an offshore facility.

## 7.5 LOADING RACKS

The WCAA does not own or operate any loading racks at DTW.

## 7.6 DEMONSTRATION OF PRACTICABILITY

The WCAA has determined that the use of existing containment structures and readily available spill equipment and manpower to prevent the discharge of oil from both fixed and mobile oil storage from reaching navigable water, is practical and effective for this facility.

## 7.7 PRECIPITATION DRAINAGE

See *Site Stormwater Drainage* (Section 4.4) and *Facility Discharge or Drain Prevention Measures and Controls* (Section 4.4.3).

## 7.8 MISCELLANEOUS TANK ISSUES

### 7.8.1 Partially-Buried Storage Tanks

There are no partially buried metal storage tanks subject to this rule at this facility, therefore requirements of 112.8(c)(5) do not apply.

### 7.8.2 Control of Leakage Through Defective Heating Coils

There are no internal heating coils within any tanks at this facility (112.8(c)(7)).

### 7.8.3 Tank Installation Fail Safe Engineering

Overfill protection is provided for as shown in TABLE A, where alarms are not present, remaining ASTs have direct read gauges for direct volume checks. WCAA personnel are present throughout the filling operations to monitor product levels within each container. For 55-gallon drums, it is deemed unnecessary to have overfill prevention measures as described in 112.8(c)(8) as they are stored on secondary containment pallets and are single-use containers. These activities are deemed environmentally equivalent to the overfill requirements of the SPCC regulation.

### 7.8.4 Tank Compatibility with Contents

All storage containers at DTW are compatible with the materials they contain, as well as the temperature and pressure conditions of storage.

### 7.8.5 Brittle Fracture Evaluation

Shell thicknesses on all storage tanks are less than 0.5 inches. As discussed in the American Petroleum Institute (API) Standard 653 *Tank Inspection, Repair, Alteration, and Reconstruction* (API-653), brittle fracture is not a concern for tanks having a shell thickness less than 0.5 inches.

### 7.8.6 Visible Discharges

Oil leaks resulting in a loss of fuel from tank seams, gaskets, rivets and bolts will be corrected promptly (112.8(c)(10)).

## 7.9 QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT

The DTW facility contains many, small, mostly pad-mounted transformers. These transformers have been determined to not pose a significant leak/spill concern.

## 7.10 SPCC REQUIREMENTS FOR ON-SHORE FACILITIES

The facility is an on-shore facility and as such must meet the general requirements listed under 40 CFR 112.7 presented above and meet the requirements for onshore facilities under 40 CFR 112.8.

## 7.11 FACILITY TRANSFER OPERATIONS

### 7.11.1 Buried Piping Installation, Protection and Examination

Buried piping associated with WCAA-owned USTs has appropriate cathodic protection and/or interstitial monitoring.

Buried piping when exposed (due to construction activities or other reasons) will be inspected for corrosion damage and the inspection documented and retained for three (3) years. If upon examination, corrective actions are required, repairs will be conducted promptly. If damage may increase the potential for a release of material, the system will be deemed inoperative and will be tagged and locked out to prevent use until repairs are complete.

### 7.11.2 Not in Service and Standby Service Terminal Connections

The terminal end connection of pipes that are no longer in use will be equipped with a blank flange and marked as to their origin.

### 7.11.3 Pipe Support Design

Pipeline supports, flange joints, and expansion joints are designed to minimize abrasion and corrosion and allow for expansion and contraction conditions.

### 7.11.4 Above-Ground Piping Protection from Vehicular Traffic

All above-ground piping is protected by buildings and/or other barricades. Any future above-ground piping not protected by buildings and/or other barricades and that are vulnerable to being struck by a vehicle, will either be labeled with appropriate signs to alert all drivers of this danger, or brought to the attention of the driver by facility security personnel.

## 7.12 DRAINAGE SYSTEMS FROM UNDIKED AREAS

See *Site Stormwater Drainage* (Section 4.4) and *Facility Discharge or Drain Prevention Measures and Controls* (Section 4.4.3).

## 7.13 FINAL DISCHARGE OF DRAINAGE

See *Site Stormwater Drainage* (Section 4.4) and *Facility Discharge or Drain Prevention Measures and Controls* (Section 4.4.3).

## 7.14 FACILITY DRAINAGE SYSTEMS AND EQUIPMENT

See *Site Stormwater Drainage* (Section 4.4) and *Facility Discharge or Drain Prevention Measures and Controls* (Section 4.4.3).

## 7.15 REMAINING REQUIREMENTS

40 CFR 112.8(d), 112.9 through 112.15, 112.20 and 112.21 are not applicable.

# APPENDIX A DTW NPDES PERMIT NO. MI 0036846

# APPENDIX B DTW SPILL / RELEASE REPORTS

# APPENDIX C EGLE GENERIC SPILL OR RELEASE FORM

# APPENDIX D DTW REGULATORY RELEASE CORRESPONDENCE

# APPENDIX E DTW INDUSTRIAL PRETREATMENT PERMIT NO. 10914 (DWTF)

# APPENDIX F DTW WASTEWATER DISPOSAL PERMIT (DWSD)

# APPENDIX G DTW DETENTION POND OPERATIONS MANUAL

# APPENDIX H DTW POND 6 EMERGENCY ACTION PLAN

# APPENDIX I DTW TENANT FACILITY LIST

# APPENDIX J DTW TENANT INSPECTION SOP and FORM

# APPENDIX K DTW AND TENANT STORMWATER TRAINING PROGRAMS AND ATTENDEES

# APPENDIX L MATERIAL DATA SAFETY SHEETS

# APPENDIX M DTW SPENT AIRCRAFT DEICING FLUID COLLECTION OPERATIONS MANUAL

# APPENDIX N DTW EGLE OPERATIONS AND COMPLIANCE PLAN

# APPENDIX O TENANT SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLANS

# APPENDIX P EGLE SALT AND BRINE GUIDANCE

# APPENDIX P OIL SPILL CONTINGENCY PLAN

# APPENDIX Q STEEL TANK INSTITUTE STANDARD SP-001