

Activity Summary - Stormwater Pollution Prevention Plan (SWPPP)

Pinnacle Airlines Operating as Delta Connection (SIC 4512)

TCEQ Permit # TXR05AQ81

Pinnacle Airlines is operating as a Delta Connection at the Dallas Love Field occupying Gate 31 as its sole leasehold. Pinnacle Airlines operations include both above-wing activities (ticketing) and below-wing activities (ground handling).

Pinnacle Airlines does not perform any scheduled aircraft maintenance; however, will contract with a third party for line maintenance as necessary.

Pinnacle Airlines does not conduct any aircraft washing. Pinnacle Airlines does not conduct ground service equipment maintenance.

Fueling of aircraft and equipment is performed by an FBO, Sky Tanking.


Pinnacle Airlines does not maintain any bulk chemicals and does not generate regulated wastes.

De-icing/Anti-icing is conducted when necessary. Best Management Practices (BMP's) are followed.

In accordance with Pinnacle Airlines corporate policies and procedures, the Station Manager will act as the "responsible official" for the facility. As the responsible official, the Station Manager will be the Storm Water Pollution Prevention team leader with the on-duty supervisor acting as an alternate. [see ENV 04] The SWPPP Team will be responsible for reviewing the Airport SWPPP and implementing all elements of it. All employees will be trained on best management practices. Quarterly inspections will be conducted by trained personnel and records maintained for review. [see ENV 06]

In addition to any BMP's required within the airport's SWPPP, Pinnacle has implemented the following BMP's:

- Good Housekeeping (SW BMP1)
- Aircraft & Vehicle Parking (SW BMP2)
- Aircraft, Ground Vehicle & Equipment Maintenance (SW BMP3)
- Aircraft, Vehicle, & Equipment Fueling (SW BMP4)
- Aircraft Anti-Icing & Deicing (SW BMP5)
- Aircraft, Ground Vehicle, & Equipment Washing (SW BMP 6)
- Aircraft Lavatory Servicing (SW BMP7)
- Outdoor Storage & Material Handling (SW BMP8)
- Waste Handling & Disposal (SW BMP9)
- Spill Response (SW BMP10)



Potential pollutants from Pinnacle Airlines operations include jet fuel and other petroleum products from aircraft and ground service equipment parking and fueling and propylene glycol from de-icing/anti-icing operations.

Exposed materials:

- There are no exposed materials stored on site that may be exposed to precipitation or runoff in a drainage area of an outfall.

Deicing procedures are conducted at the ramp area, at least 50 feet away from Storm Drains and then cleaned by absorbent material if pooling is present. If no visible pooling is present absorbent material is not used and left to dry. No runoff into storm drains is expected during dry events.





Waste Handling & Disposal

Purpose:

Prevent or eliminate the discharge of pollutants to storm water from waste handling and disposal.

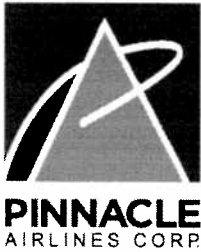
Applicable Activities:

All airport activities.

General Approach:

To the maximum extent practicable:

- Waste handling and storage areas should be covered if possible.
- Perform regular housekeeping activities in waste storage areas and surroundings and inspect waste collection areas regularly.
- Maintain a minimal inventory of required chemicals to reduce the magnitude of potential spills and limit waste generation.
- Evaluate substitutes for hazardous chemicals.
- Evaluate the processes generating wastes to identify opportunities for waste minimization and recycling.
- Use only dumpsters with plugged drain holes to prevent leaks from waste materials or run-through of stormwater.
- Avoid waste collection and storage in areas of storm drain inlets and catch basins.
- Schedule waste pickup as frequently as necessary to keep waste storage at a minimum.
- Inspect the hydraulic lines and connections on the trash compactor on a regular basis to ensure that leakage is not occurring. All leaks must be repaired as soon as possible with residual material being cleaned using absorbent materials.
- If hazardous and or regulated wastes are generated, follow the Pinnacle Airlines Corp. waste procedures. [Chapter 6 Environmental Procedures Manual]
- Provide the appropriate level of training for employees for spill response and prevention, storm water pollution prevention, right-to-know awareness (MSDS), hazardous material management, and waste disposal.



Aircraft Lavatory Servicing

Purpose:

Prevent or eliminate the discharge of pollutants to storm water drains or receiving waters from the servicing of aircraft lavatories.

Applicable Activities:

Ground service agents.

General Approach:

To the maximum extent practicable:

- Use only surfactants and disinfectants approved for use. Do not discharge or rinse other unapproved chemicals or materials into the triturator facility.
- Carefully handle chemicals and chemical concentrates. Immediately collect dry chemicals or absorb liquid chemicals using dry clean up methods for proper disposal. Do not hose down spills unless the discharge enters the sanitary sewer system through a permitted connection (triturator facility).
- Do not discharge lavatory waste to a sanitary sewer connection other than triturator facilities.
- Utilize buckets or pans to capture drippage from aircraft lavatory access fittings.
- Drain the aircraft connecting hose as completely as possible into the storage tank after servicing aircraft. Properly secure all hoses, valves, and equipment when transporting waste to eliminate leakage and spillage.
- Practice good housekeeping techniques at the triturator facility. Immediately clean spills of wastes and chemicals.
- The triturator unit must be inspected on a regular basis to ensure that it is being maintained in a clean and orderly manner, and that sanitizing fluid and/or sewage is not being tracked from the facility.
- Train all employees on proper good housekeeping, pollution prevention, spill response and prevention, right-to-know awareness training and hazardous materials management.



Aircraft, Ground Vehicle, & Equipment Washing

Purpose:

Prevent or eliminate the discharge of pollutants to storm water drains or receiving waters from aircraft, vehicle, and equipment washing.

Applicable Activities:

Aircraft washing, vehicle washing, equipment washing, equipment cleaning, and equipment degreasing.

General Approach:

To the maximum extent practicable:

- Use only **dry washing** for aircraft. Dispose of any residual materials and wash rags properly.
- Implement basic good housekeeping practices to keep wash areas clean and free of waste.
- For non-aircraft cleaning, use only designated wash areas indoors, or outdoors covered and bermed where feasible, to prevent contamination of storm water by contact with wastes.
- Use only biodegradable phosphate-free detergents.
- Collect and discharge wash water to an approved treatment facility (sanitary sewer system) through a permitted connection. Note that wastewater agencies likely require permits & or approval for discharge of wash water to their municipal sewer systems.
- Maintain adequate supplies of spill response equipment and materials in accessible locations near areas where spill may be likely to occur.
- Train all employees on proper Good Housekeeping and pollution prevention.



Aircraft, Vehicle, & Equipment Fueling

Purpose:

Prevent fuel spills and leaks, and reduce or eliminate their impacts on storm water.

Applicable Activities:

Aircraft fueling, vehicle fueling, and equipment fueling.

General Approach:

To the maximum extent practicable:

- Fuel dispensing equipment should be equipped with “breakaway” hose connections that will provide emergency shut-down of flow should the fueling connection be broken through movement.
- Automatic shut-off mechanisms should be in place on fuel tankers and should be conspicuously marked/labeled as such. These valves should remain in the closed position unless manually opened during fueling.
- Fuel pumps intended for vehicular use (not aircraft) should be posted with signs stating “No Topping Off” to prevent overflow.
- Employ secondary containment or cover when transferring fuel from a tank truck to a fuel tank.
- Use absorbent materials and spot cleaning for incidental spills & drips. Do not hose down the area unless the storm drain is blocked and drainage is collected by vacuum vehicle and disposed of properly.
- Ensure spill response material is readily available.
- Avoid mobile fueling of equipment whenever feasible; fuel mobile equipment at designated fueling areas.
- Fueling should take place on concrete surfaces and should not be done on or near unimproved or asphalt surfaces.
- Provide the appropriate level of spill response training to address potential spills or releases.



Aircraft, Ground Vehicle & Equipment Maintenance

Purpose:

Prevent or eliminate the discharge of pollutants to storm water from aircraft, vehicle, and equipment maintenance and repair.

Applicable Activities:

Aircraft maintenance, ground vehicle maintenance and ground equipment maintenance.

General Approach:

To the maximum extent practicable:

- Perform maintenance activities indoors, or provide cover over work areas.
- Maintain clean equipment. Use non-chlorinated solvents and cleaning agents to clean equipment. Only dry-washing methods are used for aircraft cleaning. Use biodegradable products and substitute materials with less hazardous properties where feasible.
- Maintain a minimal and organized inventory of maintenance materials.
- Properly containerize and dispose of all drained fluids.
- Store all batteries, mechanical parts & empty drums indoors or under cover.
- Maintain spill response materials and supplies.
- Immediately contain and recover all spills. Use absorbent materials at potential problem areas.
- Drain (and if possible crush) oil filters and containers before recycling or disposing. Collect filters and empty containers in a covered leak-proof container.
- Drain all fluids and remove batteries from salvage aircraft, vehicles, and equipment if they are to be stored for extended periods of time.
- Develop regular inspections and cleaning schedules for oil/H₂O separators.
- Do not hose down the apron or hanger floor into storm drains. Wash water must be collected and disposed of properly. As an alternative, use mops, dry sweeping compound, or contract professional cleaning services.
- Provide the appropriate level of training for employees for spill response and prevention, storm water pollution prevention, right-to-know awareness (MSDS), and hazardous material/waste handling management.



Aircraft & Vehicle Parking

Purpose:

Prevent or eliminate the discharge of pollutants to storm water from aircraft, vehicle, and equipment.

Applicable Activities:

Aircraft maintenance, ground vehicle maintenance and ground equipment maintenance.

General Approach:

To the maximum extent practicable:

- All ground vehicles and equipment should be parked in designated areas on concrete surfaces away from any storm drains.
- Leaking equipment must be serviced as soon as operationally possible and drip pans placed to collect any leaking fluids.
- Fluids leaked from equipment must be cleaned up and disposed of immediately.
- Store equipment under covered areas when possible.
- Keep equipment and storage areas clean.
- Conduct regular inspections of vehicle parking and equipment storage areas for evidence of leaks.



Aircraft Anti-Icing & Deicing

Purpose:

Prevent or eliminate the discharge of pollutants to storm water from snow and ice melting and removal.

Applicable Activities:

Anti-Icing and De-Icing of aircraft.

General Approach:

To the maximum extent practicable:

- Centralize storage and label all deicing and anti-icing materials.
- Minimize storm water impact at storage areas by enclosing the storage area, constructing a berm around the storage area, storing materials inside, covering the storage area, or other similar approaches. Ensure containers are protected from vehicular traffic.
- Deicing and anti-icing must always be performed in designated areas.
- Designated areas must be paved with concrete and should be sloped to facilitate deicing fluid collection.
- If required, notify airport operations prior to de-icing & anti-icing activities and provide all necessary information that may be requested.
- Deicing & anti-icing fluids must not be allowed to flow into any drain or onto the ground (soil). If a storm drain has a reasonable potential to be impacted, storm drain covers must be utilized during deicing and anti-icing events.
- Ensure that the amount of deicing & anti-icing agent applied is appropriate to the need.
- Collect/remove/dispose of any residual fluids.
- Provide the appropriate level of training for employees for spill response and prevention, storm water pollution prevention, right-to-know awareness (MSDS), hazardous material management, and waste disposal.



Good Housekeeping

Purpose:

Maintain a clean and orderly work environment, which is intended to reduce the potential for pollutants entering the storm drain.

Applicable Activities:

All airport activities.

General Approach:

To the maximum extent practicable:

- Implement basic good housekeeping practices facility wide and conduct regular inspections to identify wet oil areas and vehicle & equipment leakage.
- Develop and implement clean-up procedures for vehicle & equipment leaks.
- All identified findings during regular inspections to be addressed by dry cleanup methods when possible.
- Identify, inventory, and label all storage containers on-site.
- Regularly inspect all storage containers for leaks, spills.
- Minor spills must be cleaned up immediately and disposed of properly.
- Walkways, aisles, roadways and exits are to be kept clear at all times.
- Materials are stored in a neat and orderly fashion without blocking walkways or access routes.
- Inside floors & workspaces are to be kept clear of debris and swept and washed as necessary.
- Keep outside storage to a minimum. Any outside chemical storage must be under a roof.
- All refuse is to be placed in an appropriate container.
- Tools and equipment are to be kept clean and stored when not in use.
- Train all employees on proper Good Housekeeping techniques and requirements.



Outdoor Storage & Material Handling

Purpose:

Prevent or eliminate the discharge of pollutants to storm water drains or receiving waters from loading and unloading and storage of material and cargo.

Applicable Activities:

Aircraft lavatory services, fuel storage & dispensing, chemical storage & delivery, waste storage, and equipment storage.

General Approach:

To the maximum extent practicable:

- Protect all significant materials from rainfall, run-on, runoff, and wind dispersal to the maximum extent practicable. Viable options include:
 - Store materials indoors
 - Cover storage areas with a roof
 - Cover the material with a temporary waterproof covering.
 - Minimize storm water run-on or runoff by enclosing or berming the area.
- Minimize the quantities of materials stored outside and make use of existing overhangs to the extent practicable.
- Do not dispense from drums positioned horizontally in cradles. Dispense from upright drums with the appropriate pump.
- Where necessary, store drums and containers on spill pallets to provide containment in the event of a spill or release. Keep drums, containers, and spill pallets clean.
- Discharge collected storm water from secondary containment according to site specific requirements. Contact corporate environmental for guidance if necessary.
- All materials should be stored in their original containers or container approved for their use. All containers must be kept closed except when dispensing or filling. Empty containers must be indoors or under cover until removed.
- All containers must be properly labeled with their contents and hazards.
- Regular inspections must be conducted in waste collection areas and chemical storage areas.
- Avoid transferring materials in close proximity to storm drain inlets. Transfer liquids in paved areas and use drip pans under hose connections.
- Contain and absorb leaks during transfers and hose disconnections. Dispose of residue properly.
- Provide the appropriate level of training for employees for spill response and prevention, storm water pollution prevention, right-to-know awareness (MSDS), hazardous material management, and waste disposal.



Spill Response

Purpose:

Prevent or eliminate the discharge of pollutants to storm water resulting from spills of petroleum products or other materials.

Applicable Activities:

Aircraft, vehicle, & equipment maintenance and fueling, aircraft deicing & anti-icing, aircraft lavatory service, aircraft, vehicle, & equipment washing, floor washing, and material storage.

General Approach:

To the maximum extent practicable:

- The airport authority should be notified immediately when a spill or leak occurs. A spill report must be filed with Pinnacle Airlines Corp. [On-line spill incident report on the corporate web]
- Maintain adequate supplies of spill response equipment and materials in accessible locations. The facility is responsible for identifying areas where spills have a high potential to occur.
- Containment and cleanup of spills and leaks must be done immediately.
- Minor spills (less than 5 gallons that has not reached the soil or waters of the state) may be cleaned up by station personnel following posted safety and environmental guidelines. Major spills require immediate notification to the airport authority fire department or other designated emergency response organization for response assistance. SOC and Corporate Environmental must be notified as soon as possible.
- Any spill of a hazardous substance that enters the waters of the state or meets the state Reportable Quantity must be reported to the corporate environmental office for coordination of external reporting to regulatory authorities.
- Specific spill response guidance is detailed in Pinnacle Airlines Corp. Environmental Procedures Manual, chapter 3.
- Provide the appropriate level of training for employees for spill response and prevention, storm water pollution prevention, right-to-know awareness (MSDS), hazardous material management, and waste disposal.