



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Benjamin H. Grumbles
Director

December 7, 2009

Inspection #151021 (Stormwater)

Arizona Aerospace Foundation
Attention: Yvonne C. Morris, Executive Director
6000 E. Valencia Road
Tucson, AZ 85756

Subject: Compliance Inspection of the Pima Air & Space Museum Facility
6000 E. Valencia Road, Tucson, AZ 85756
Stormwater Multi-Sector General Permit (MSGP) for Industrial Activities,
Santa Cruz Water Shed

Dear Ms. Morris:

Enclosed is a copy of an Inspection Report prepared by Kenneth R. Best of our staff concerning the referenced facility. An inspection was performed on November 24, 2009, in accordance with Arizona Revised Statutes (A.R.S.) 49-255 *et seq.* and with the Arizona Administrative Code (A.A.C.) R18-9-A901 *et seq.*

Potential deficiencies were found in the operation and maintenance of this facility at the time of inspection and are noted in the report. No further action will result from this inspection at this time. However, a Storm Water Pollution Prevention Plan (SWPPP) needs to be developed and implemented. Further, a Notice of Intent to Discharge (NOI) needs to be filed with ADEQ as soon as Arizona's 2010 MSGP is implemented early next year. Information about this requirement was provided at the time of the inspection. Finally, ADEQ will re-inspect your facility for compliance with the 2010 Permit within six months of its issuance.

If you have any further questions regarding this or any other matters pertaining to your facility, please call Ken Best at (520) 628-6709. Thank you in advance for your efforts to comply with Arizona's environmental rules and regulations.

Sincerely,

Martin D. McCarthy, P.E.
Acting Director and
Regional Compliance Manager
Southern Regional Office

cc: Pima County Department of Environmental Quality
Cynthia Campbell, Manager WQCS, ADEQ
Debra Daniel, Manager SWS, WQD, ADEQ

Northern Regional Office
1801 W. Route 66 • Suite 117 • Flagstaff, AZ 86001
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
Compliance Programs Unit - Southern Regional Office
400 W. Congress, Suite 433, Tucson, AZ 85701**

INSPECTION REPORT - STORM WATER

Facility: Air and Space Museum - Stormwater Multi-Sector General Permit for Industrial Activity

RP No. 22069

AZPDES No.

AUTHORIZATION No. AZMSG-N/A

Insp. No. 151021

Case No.

Place ID No. 7680

Inspected By: Kenneth R. Best

Inspection Date: 11/24/09

Report Date: 11/25/09

Accompanied By: Scott Marchand, Director of Restoration, Jesse Espinoza, Operations Manager, Yvonne Morris, Executive Director

County: Pima

1. This system meets the requirements of the following permits.
 - A. AZPDES General Permit
 - B. AZPDES Individual Permit
2. The effluent quality of this system meets ADEQ and U.S. EPA standards
3. The owner/operator of this system has filed the required NOI(s) with ADEQ
4. The facility met the ADEQ standards for physical facilities at the time of the inspection
5. The SWPPP meets the Permit requirements

	YES	NO	N/A
		X	
			X
		X	
		X	
		X	

FACILITY DESCRIPTION

The Air and Space Museum (located at 6000 E. Valencia Road, Tucson, AZ 85756) is operated by Arizona Aerospace Foundation Inc. The Executive Director of the foundation is Yvonne C. Morris. The museum acquires, restores and displays vintage airplanes for public view. The restoration area is located on the southwest side of the facility and that area was the focus of this stormwater inspection. Airplanes are brought to this area to be restored. According to Scott Marchand the planes have already been stripped of any contaminating materials, such as oil and asbestos, off site. The general direction of stormwater flow is from east to west and is mainly collected in a natural drainage ditch (or small wash) that bisects the property. According to Tom Moulton, Director of the Pima County Economic Development and Tourism Agency that administers the Operating Agreement for the facility, The Museum has been in existence on this site sine 1978.

INSPECTOR COMMENTS

The results of this Stormwater survey indicate that the Air and Space Museum has not complied with ADEQ stormwater requirements as follows:

- a) The Museum should have applied for coverage under the Stormwater Multi-Sector General Permit for Industrial Activities (MSGP). There is no NOI on file for this facility.
- b) A Storm Water Pollution Prevention Plan (SWPPP) has not been developed or implemented.
- c) There is no drainage site map indicating direction of surface runoff and the location of dismantling areas, liquid storage tanks, sumps, oil water separators or stormwater monitoring locations.
- d) Potential pollutants, sources of pollutants, and potential for contamination of stormwater discharge have not been identified.
- e) There is no evidence that appropriate Best Management Practices (BMPs) have been described or are being implemented at the site.
- f) There is no evidence that employees are trained in procedures for spill prevention or cleanup.

Operational deficiencies, according to ADEQ rules and regulations, were noted as follows:

- a) Equipment is prepped for painting by pressure washing. Paint chips are evident all around the washing area and in the drainage ditch where the wash water flows.
- b) Soil contamination from old paint chips, grease, oil, anti-freeze and brake fluid is evident.
- c) Vehicle and equipment dismantling pads are uncovered and unprotected from stormwater run-on or run-off.
- d) No secondary containment vessel or cover was provided for the storage of used oils, batteries and other contaminated parts and materials.
- e) Oily equipment parts are stored in uncovered locations and scattered about on the bare ground.
- f) There was evidence of potentially polluted runoff leaving the site at several points.
- g) There are poor housekeeping practices including oil spills not adequately prevented or cleaned-up, trash and other debris scattered around the area.
- h) The sump for the dismantling pad does not have oil-water separation and recovery capability. It drains directly to a wash.
- i) There is no sump with oil-water separation located in the mechanics shop. Evidence of contaminated soil is all around this facility.
- j) There is at least one soil stockpile on site that has no BMP protection from erosive runoff.

SUMMARY

The results of this Stormwater survey indicate that the Air and Space Museum has multiple deficiencies in compliance with ADEQ's stormwater regulations. Since the Museum did not apply for coverage under the MSGP the facility has been discharging without a permit as required by the Arizona Revised Statutes §49-255.01 (A).