



CITY OF  
TUCSON  
DEPARTMENT OF  
TRANSPORTATION

January 13, 2010

Ms. Yvonne C. Morris  
Executive Director  
6000 E. Valencia Road  
Tucson, AZ 85756

**RE: *Stormwater Inspection of Pima Air & Space Museum,  
(December 16, 2009)***

Dear Ms. Morris:

Thank you for meeting with me to conduct a visit of your industrial facility. As was discussed, the City is required to inspect certain industrial facilities subject to National Pollutant Discharge Elimination System (NPDES) Stormwater regulations. This requirement is part of the City's Municipal Stormwater NPDES permit, and compliance is mandated by the Environmental Protection Agency (EPA) under the federal Clean Water Act and by the Arizona Department of Environmental Quality (ADEQ) under state water quality regulations and conducted in accordance with the City's Stormwater Ordinance, Chapter 26 of the Tucson Code.

In order to fulfill our requirements, our inspection focused on determining if your facility is required to file a Notice of Intent (NOI) and if a Stormwater Pollution Prevention Plan (SWPPP) must be developed and implemented. Permit requirements are based in part on the Standard Industrial Classification (SIC) code for your particular site. The SIC codes we have on file for Pima Air and Space Museum are 8412 (Museums and Art Galleries) and 7538 (General Automotive Repair Shops), which are not subject to the NPDES regulations.

In order to provide guidance to industrial facilities, we have provided a listing of stormwater pollution concerns as well as suggestions that may prove helpful in achieving compliance with the federal regulations as they apply to your facility. **PLEASE BE ADVISED**, however, that the City takes no legal responsibility or liability for said suggestions. You remain responsible for the regulatory and safety adequacy and appropriateness of any solution(s) that you choose. PLEASE BE FURTHER ADVISED that major structural or equipment changes, suggested or needed to achieve compliance may require one or more building safety, fire or other permits prior to execution and this letter does not constitute permission or authority to proceed to make these types of changes.

Findings:

1. While no permit coverage is required, a management plan should be written and implemented to outline pollution prevention practices employed at the Restoration and Vehicle Maintenance areas to prevent stormwater contamination. The management plan should describe tasks performed on site and should include a detailed site map showing surface flow; administrative



best management practices (BMP), i.e. training, inspection reports, general housekeeping practices and other preventive measures used to reduce or eliminate potential pollutants. The plan should also identify the locations of fuel tanks, parts storage areas, sumps, oil/water separators, containment berms, discharge (outfalls) points and a list of exposed materials that have a potential to cause stormwater contamination.

2. Aircraft and equipment wash water should be contained and not allowed to discharge off the property. ADEQ requires that discharges from

vehicle/equipment washing be covered by a Type 3 general permit, as provided by Arizona Administrative Code (A.A.C.) Title 18, Chapter 9, Article

3. To get covered owners must file a Notice of Intent to Discharge (NOI) required by A.A.C. R18-9-A301 (B). In addition to this form, applicants must complete the appropriate NOI Supplemental Form. Facilities intending to operate under a Type 3 general permit must comply with all the provisions of the general permit, including requirements listed in the regulation pertaining to location, design, monitoring, record keeping, and other applicable requirements of statute and rule. Copies of these forms were provided during my visit.

3. Store all open containers on spill containment pallets. Care should be taken not to exceed pallet containment capabilities. Obtain adequate amount of spill pallets.

4. Train personnel on the proper spill prevention and clean-up procedures. Obtain containers to store new and used absorbent materials. Place a spill kit in the Restoration building and one in the vehicle maintenance shop.

5. Determine whether a Spill Prevention Control and Countermeasure (SPCC) plan is required for the petroleum products used. If required, the SPCC must be developed and approved by a certified registered engineer.

Specific timelines to develop a stormwater pollution prevention plan and implement best management practices have been established in the federal regulations (Federal Register, 65 FR parts 4.9.3 and 4.9.11) and are as follows: if inspecting agencies find deficiencies in your Stormwater Pollution Prevention Plan, they must be corrected within 30 calendar days following notification from our office.

While no permit coverage is required, please bear in mind that when ADEQ finalizes its new multi-sector general permit (MSGP), requirements may change that could require additional action on your part.

Stormwater Management Section staff will re-visit your facility in March 2010 to review your management plan and provide further assistance in meeting your goal of stormwater compliance. In the event that progress toward compliance has not been made, the City may refer your facility to ADEQ or EPA for further action.

On behalf of the City of Tucson, I want to express appreciation of your efforts to achieve our common goal of an environmentally safe community. Feel free to contact us at 791-4251.

Sincerely,

A handwritten signature in black ink that reads "Ron Ravago". The signature is written in a cursive style with a large, looping initial "R".

Ron Ravago  
Industrial Program Manager

cc: 2009 Industrial Inspection File

# STORMWATER INDUSTRIAL INSPECTION FORM

Page 1 of 4

<b>FACILITY NAME</b> Pima Air and Space Museum	<b>SITE ADDRESS</b> 6000 E. Valencia Road Tucson, AZ 85756		
<b>BUSINESS TYPE/ACTIVITY</b> Aircraft Museum and Restoration	<b>SIC</b> 8214 and 7532	<b>NAICS</b>	<b>INSPECTION DATE</b> December 16, 2009
<b>CONTACT NAME</b> Scott Marchand, Dir. of Collections & Aircraft Restorations	<b>PHONE</b> (520) 618-4811		<b>FAX</b> (520) 574-9238
<b>OWNER NAME</b>	<b>PHONE</b>		<b>FAX</b>
<b>LATITUDE (Degrees, Minutes, Seconds)</b> 32° 08' 29.29"	<b>LONGITUDE (Degrees, Minutes, Seconds)</b> -110° 51' 54.62"		
<b>OTHER PERMITS OR REQUIREMENTS</b> <input type="checkbox"/> RCRA <input type="checkbox"/> AIR QUALITY <input type="checkbox"/> WASTEWATER <input checked="" type="checkbox"/> <b>AQUIFER PROTECTION PERMIT</b> <input type="checkbox"/> OTHER: _____			

## STORMWATER REQUIREMENTS

<b>PERMIT TYPE:</b> <b>MULTI-SECTOR</b> <input type="checkbox"/> <b>INDIVIDUAL</b> <input type="checkbox"/> WHICH ONE? <b>NOT REGULATED</b> <input checked="" type="checkbox"/> <b>NO EXPOSURE</b> <input type="checkbox"/> ... ON FILE? Yes    Permit # _____ No    N/A <input checked="" type="checkbox"/>	<b>PRIORITY INDUSTRY</b> <input type="checkbox"/> <b>SARA III</b> <input type="checkbox"/> <b>Has the facility filed an NOI?</b> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <b>Does the facility have a SWPPP?</b> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	---

## SWPPP EVALUATION

SWPPP REVIEW	Y		N		SWPPP IMPLEMENTATION	Y		N	
WORKPLACE NARRATIVE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EMPLOYEE TRAINING	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
P2 TEAM IDENTIFIED	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	POLLUTANT SOURCE IDENTIFICATION ACCURACY	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
POLLUTANT SOURCES IDENTIFIED	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SITE MAP VERSUS ACTUAL FIELD CONDITIONS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SITE MAP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	COMPREHENSIVE SITE COMPLIANCE EVALUATION	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
INVENTORY OF EXPOSED MATERIALS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	MONITORING PLAN BEING FOLLOWED	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MONITORING REQUIREMENTS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	RECORDS REVIEW	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
RECORDKEEPING REQUIREMENTS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SPILL RESPONSE KIT PRESENT AND ACCESSIBLE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SPILL INVENTORY / CONTROL PLAN	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EMPLOYEE AWARENESS OF SPILL PROCEDURES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SIGNED CERTIFICATION / NON-STORM DISCHARGES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	BMPs EMPLOYED (SEE BELOW)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
BMPs IDENTIFIED	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					

## BMPS

ACTIVITY	N/A	DESCRIBE BMP AND EFFECTIVENESS
<b>OUTDOOR PROCESS/MANUFACTURING AREAS</b>	<input type="checkbox"/>	Aircraft dismantling, washing, parts storage and vehicle maintenance operations take place outside.
<b>OUTDOOR MATERIAL STORAGE AREAS</b>	<input type="checkbox"/>	All materials used during vehicle maintenance are stored indoors. As a precaution, materials in containers 5-gallons or larger, stored indoors should be placed on spill pallet so that spills and leaks are contained. Aircraft parts are placed on pallets and stored outside.
<b>OUTDOOR WASTE STORAGE/DISPOSAL AREAS</b>	<input type="checkbox"/>	Waste solvents are now stored indoors and is contracted for disposal by a private contractor. As a precaution, waste containers should be placed on spill pallets.
<b>OUTDOOR VEHICLE AND HEAVY EQUIPMENT STORAGE/MAINTENANCE AREAS</b>	<input type="checkbox"/>	Vehicles are parked over night in an unpaved parking lot.
<b>OUTDOOR WASH AREAS</b>	<input type="checkbox"/>	Aircraft and some small equipment are cleaned/prepped for painting with a high pressure washer on site on a concrete pad. Wash water should be contained. Contact ADEQ to determine whether an Aquifer Protection Permit is required.
<b>OUTDOOR DRAINAGE FROM INDOOR ACTIVITIES</b>	<input checked="" type="checkbox"/>	None.

# STORMWATER INDUSTRIAL INSPECTION FORM

Page 2 of 4

## RESULTS

<b>FOLLOW-UP INSPECTIONS</b> March 2010	<b>FACILITY NAME</b> Pima Air and Space Museum	<b>INSPECTION DATE</b> December 16, 2009
--	---	---

**ENFORCEMENT ACTION**

**COMMENTS:**

Although your standard industrial classification codes are not regulated by NPDES or Arizona Pollutant Discharge Elimination System (AZPDES) stormwater regulations, several stormwater concerns were noted and must be addressed.

**Inspection Findings:**

1. While no permit coverage is required, a management plan should be written and implemented to outline current and future pollution prevention practices at the Restoration and Vehicle Maintenance areas to prevent stormwater contamination. The management plan should describe the tasks performed on site and should include a detailed site map showing surface flow; administrative best management practices (BMP), i.e. training, inspection reports, general housekeeping practices and other preventive measures used to reduce or eliminate potential pollutants, it also identify the locations of fuel tanks, parts storage areas, sumps, oil/water separators, containment berms, and discharge (outfalls) points and a list of exposed materials that have a potential to cause stormwater contamination.
  
2. The discharge from vehicle/equipment rinsing/washing is not allowed. Aircraft and equipment wash water should be contained and not allowed to discharge off the property. ADEQ requires that discharges from vehicle/equipment rinsing/washing be covered by a Type 3 general permit, as provided by Arizona Administrative Code (A.A.C.) Title 18, Chapter 9, Article 3. To get covered owners must file a Notice of Intent to Discharge (NOI) required by A.A.C. R18-9-A301 (B). In addition to this form, applicants must complete the appropriate NOI Supplemental Form. Facilities intending to operate under a Type 3 general permit must comply with all the provisions of the general permit, including requirements listed in the regulation pertaining to location, design, monitoring, record keeping, and other applicable requirements of statute and rule. Copies of these forms were provided during my visit.
  
3. Store all open containers on spill containment pallets. Obtain adequate amount of spill pallets. Care should be taken not to exceed pallet containment capabilities.
  
4. Train personnel on the proper spill prevention and clean-up procedures. Obtain containers to store clean absorbent material and used waste absorbents. Spill kits should be placed near areas where spills are likely to occur.
  
5. Determine whether a Spill Prevention Control and Countermeasure (SPCC) plan is required for the petroleum products used. If required, the SPCC must be developed and approved by a certified registered engineer.

**Stormwater Management Section staff will re-visit your facility in March 2010 to review your Management Plan and provide further assistance in meeting your goal of stormwater compliance. In the event that progress toward compliance has not been made, the City may refer your facility back to ADEQ or EPA for further action.**

This inspection was conducted at the request of ADEQ following their November 2009 visit. ADEQ's inspection report stated that the facility did not comply with ADEQ stormwater requirements by not applying for coverage under the Stormwater Multi-Sector General Permit for Industrial Activities (MSGP). A notice of intent (NOI) was not filed.

*Coverage under the MSGP is based on the facility's SIC code(s). Pima Air and Space Museum is a facility that is primarily engaged in the operation of the museum for historical and educational interest which corresponds to an SIC code of 8412. The facility also has a small vehicle maintenance facility that conducts small automotive repairs to a small number of vehicles used by museum staff. The SIC code for this facility 3578. Facilities operating under either of these SIC codes are not required to develop a SWPPP or are required to submit a notice of intent (NOI) to ADEQ for coverage under the multi-sector general permit program for industrial activities.*

# STORMWATER INDUSTRIAL INSPECTION FORM

Page 3 of 4

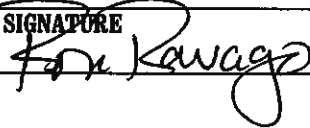
## RESULTS

<b>FACILITY NAME</b> Pima Air and Space Museum	<b>INSPECTION DATE</b> December 16, 2009
<b>COMMENTS</b> <p>The report also identified operational deficiencies, according to ADEQ rules and regulations. The facility has taken an active approach in correcting or eliminating the deficiencies noted. The deficiencies noted were:</p> <p>a. Equipment is prepped for painting by pressure paint chips were evident all around the washing area and in the drainage ditch where the wash water flows.</p> <p><i>Pima Air and Space personnel stated that since no more than one aircraft is rinsed/washed with a high pressure steam washer not a lot of wastewater is generated. They also stated that they have cleaned the areas noted by ADEQ. I did not see any evidence of paint chips around the rinse/wash pad or in the nearby wash. Soil samples were collected in the wash as directed by ADEQ. The drainage pipe from the wash pad has been capped. Wash water must be contained and not allowed to discharge off the property. Contact Arizona Department of Environmental Quality (ADEQ) at (602) 771-4683 to determine whether an APP is required for your rinse/wash operations.</i></p> <p>b. Soil contamination from old paint chips, grease, oil, antifreeze, and brake fluids is evident.</p> <p><i>Contaminated dirt around vehicle maintenance area was removed and is awaiting disposal. Written procedures are in place to prevent further contamination around the vehicle maintenance and waste storage areas.</i></p> <p>c. Vehicle and equipment dismantling pads are uncovered and unprotected from stormwater run-on on run-off.</p> <p><i>The facility is currently looking at enlarging the concrete bermed pad and installing a large capacity sump to contain the rinse water from the high pressure washer.</i></p> <p>d. No secondary containment vessels or cover was provided for the storage of used oils, batteries and other contaminated parts and materials.</p> <p><i>Waste fluid containers have been moved to a covered area and the facility is looking into purchasing secondary spill containers (spill pallets) for new and waste fluid containers including used batteries and used oil filters. Personnel are being trained on proper disposal methods and spill clean-up procedures.</i></p> <p>e. Oily equipment parts are stored in uncovered locations and scattered about on bare ground.</p> <p><i>No evidence of oily parts or soil contamination was noted during my visit. During my inspection of the parts storage area, I did not see any evidence that leaking or oil contaminated parts were stored in the area.</i></p> <p>f. There was evidence of potentially polluted runoff leaving the site at several points.</p> <p><i>Although several discharge areas or outfalls were noted, other than the rinse/wash pad, I did not see any evidence that the discharge is or could be potentially polluted.</i></p> <p>g. There are poor housekeeping practices including oil spills not adequately prevented or cleaned-up, trash and other debris scattered around the area.</p> <p><i>Spill prevention/clean up procedures have been written for restoration and vehicle maintenance personnel. Training should be conducted annually and signed and dated by employees. Spill kits have been procured and will be placed in the two areas. Obtain signs to identify spill kit locations. Obtain a container for waste absorbent material.</i></p>	

# STORMWATER INDUSTRIAL INSPECTION FORM

Page 4 of 4

## RESULTS

<b>FACILITY NAME</b> Shuttle Bus Leasing	<b>INSPECTION DATE</b> December 16, 2009
<b>COMMENTS</b>	
<p>h. The sump for the dismantling pad does not have oil-water separation and recovery capability. It drains directly into a wash.</p>	
<p><i>The facility is actively looking into constructing a larger concrete pad and installing a large underground sump tank to accommodate aircraft rinse/wash water. In the interim, the drain have been capped both ends and wash personnel will limit the amount of wastewater generated to prevent runoff. Solvents are not used on the pad.</i></p>	
<p><i>ADEQ requires that discharge from vehicle/equipment rinsing/washing be covered by a Type 3 general permit, as provided by Arizona Administrative Code (A.A.C.) Title 18, Chapter 9, Article 3. To get covered owners must file a Notice of Intent to Discharge (NOI) required by A.A.C. R18-9-A301 (B). In addition to this form, applicants must complete the appropriate NOI Supplemental Form. A facility intending to operate under a Type 3 general permit must comply with all the provisions of the general permit, including requirements listed in the regulation pertaining to location, design, monitoring, record keeping, and other applicable requirements of statute and rule.</i></p>	
<p>i. There is no sump with oil-water separation located in the mechanics shop. Evidence of contaminated soil is all around this facility.</p>	
<p><i>Personnel have stopped washing small equipment at the vehicle maintenance shop. They are now washed at the aircraft wash concrete pad.</i></p>	
<p><i>Please note that a separate NOI and NOI Supplemental form must be completed for each discharging facility (i.e., unit, discharge point) intended to be covered under a General Permit.</i></p>	
<p>j. There is at least one soil stockpile on site that has no BMP protection from erosive runoff.</p>	
<p><i>During my visit the stockpile was covered with plastic tarps and supported with heavy boulders. The soil is awaiting disposal to an appropriate landfill. Consider using straw waddles around the stockpile to contain erosion runoff.</i></p>	
<b>INSPECTOR'S SIGNATURE</b> Ron Ravago 	<b>DATE</b> January 12, 2010

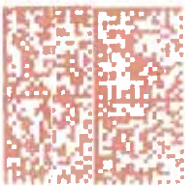


**CITY OF TUCSON**  
 DEPARTMENT OF TRANSPORTATION  
 ENGINEERING DIVISION - STORMWATER SECTION  
 201 N. STONE AVE. - 3RD FLOOR  
 P.O. BOX 27210  
 TUCSON, AZ 85726-7210

FORWARD SERVICE REQUESTED

Ms. Yvonne C. Morris  
 Executive Director  
 6000 E. Valencia Road  
 Tucson, AZ 85756

**PRESORTED  
 FIRST CLASS**



Hasler

016H26508269  
**\$00.507**  
 Mailed From 85701  
 01/14/2010  
 US POSTAGE



9 RECORDS 85756



01/14/2010