ENVIROMENTAL POLICY

Manage facilities and programs in a manner that protects the environment, safety of employees, and public health. In order to implement this policy, Department of Transportation, Airports Division (DOTA) follows these principles.

| C | Continual improvement |
| O | Obey laws |
| P | Prevent pollution |

All employees are required to know the environmental policy. You can find it at the Maintenance Baseyard office bulletin board or on DOTA’s website at:

http://hidot.hawaii.gov/airports/doing-business/engineering/environmental/
Contamination of soil, groundwater, stormwater, or surface water may be a result of the following pollutants present at the Maintenance Baseyard by their source. Significant spills *must be* reported to the Baseyard Supervisor and DOTA Environmental Health Specialist.

<table>
<thead>
<tr>
<th>POTENTIAL POLLUTANTS</th>
<th>SOURCE(S)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diesel and Gasoline</td>
<td>Fueling Area / Three 2,300-Gallon Underground Storage Tanks (USTs) / Small Equipment Fueling</td>
</tr>
<tr>
<td>Lubricants and Oils</td>
<td>Vehicle and Equipment Maintenance / Leaking Vehicles and Equipment / Storage / 280-Gallon Used Oil Aboveground Storage Tank (AST)</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOCs)</td>
<td>Solvent Storage / Parts Washer / Degreasing (Brake Pad Cleaner) / Painting and Carpentry Operations</td>
</tr>
<tr>
<td>Heavy Metals</td>
<td>Battery Storage / Engine Repair / Vehicles and Parts / Break Pads / Galvanized Steel Buildings and Fences / Tire Storage</td>
</tr>
<tr>
<td>Pesticides, Herbicides, and Fertilizers</td>
<td>Chemical Storage / Vegetation Management</td>
</tr>
<tr>
<td>Surfactants</td>
<td>Vehicle and Equipment Washing</td>
</tr>
<tr>
<td>Debris</td>
<td>Vehicle and Equipment Washing / Carpentry / Street Sweeping / Aggregate Stockpiles / General Rubbish</td>
</tr>
<tr>
<td>Hazardous Wastes</td>
<td>Hazardous Material Storage</td>
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**WHAT ARE BEST MANAGEMENT PRACTICES?**

Best management practices, or BMPs, are defined as a process or device used to control potential pollutants. BMPs are the best way to conduct daily activities while limiting your impact on the environment.

**WHY ARE THEY REQUIRED AT THE AIRPORT?**

To comply with environmental laws, National Pollutant Discharge Elimination System (NPDES) permit, and prevent pollution from impacting state waters.

**BMP INFORMATION:**

- Storm Water Pollution Control Plan (SWPCP)
- HNL Storm Water Management Program (SWMPP)
- Spill Prevention, Control, and Countermeasure (SPCC) Plan

*All documents can be found in the Maintenance Baseyard binder or with the Airport Environmental Section (AIR-EE).*

**ANNUAL TRAINING AND EDUCATION:**

- SWPCP Training
- Stormwater Fact Sheets
- Chemical Application Training
- Spill Drill
- SPCC Plan Training
- Annual training to include rosters and quizzes
GOOD HOUSEKEEPING BMPs

Implementing good housekeeping BMPs will reduce the amount of pollutants generated from daily activities performed at the Maintenance Baseyard thereby preventing them from entering the storm drain system.

• DO NOT overfill dumpsters or leave trash outside of containers.
• Remove and properly dispose of debris from all areas daily.
• Sweep and pick up trash around work areas at the Maintenance Baseyard.
• Maintain ample spill cleanup supplies.
• Clean up spills using dry methods such as rags or absorbent material promptly, and dispose of spent cleaning materials properly.
• Dispose of hazardous spilled material in accordance with Solid Waste Storage and Disposal BMPs.
• Inspect storm drains for illicit discharges and sediment build-up or debris accumulation. Schedule cleaning as necessary.
• Prevent non-stormwater discharges into the storm drain system.
Street, runway, and taxiway sweeping is performed to remove litter and debris from the vehicle and aircraft travelways in order to prevent discharge of potential pollutants into the storm drain system and improve safety and aesthetics.

- Inspect and sweep applicable areas at HNL at least twice per month.
- Increase the sweeping frequency based on inspections or complaints.
- Maintain sweepers.
- Adjust broom heights frequently to maximize efficiency of sweeping operations.
- Empty sweepers in designated area to capture solid material and minimize windblown materials.
- Clean sweepers at airport wash racks, where water is properly treated and disposed of.
- Maintain logs of locations swept, tonnage of material swept, and disposal method of debris.
Vehicle and equipment maintenance should always be conducted in a manner to prevent the impact of contaminants generated from the materials used and waste generated.

- Conduct maintenance over a drip pan, tarp, or other drainage control.
- Empty drip pans when full.
- Perform maintenance and repair activities in designated indoor or covered areas.
- Clean up spills and leaks promptly using dry methods (e.g., rags, absorbent, etc.).
- Store damaged and/or leaky vehicles and equipment indoors whenever possible.
- DO NOT leave leaking vehicles and equipment parked outside overnight.
- Transfer removed vehicle fluids to designated storage containers as soon as possible.
- Remove batteries and store under cover.
- Store 55-gallon drums of liquid materials and waste indoors or under cover and within secondary containment.
- Use the parts washer or designated areas in service bays for parts cleaning to keep solvents in one area.
- Prohibit the practice of hosing down an area where it would possibly discharge pollutants to the MS4.
Body repair activities include sanding, painting, welding, washing, and floor cleaning. The materials and waste generated by these activities have the potential to release pollutants such as oil and grease, organics, heavy metals, toxic chemicals, and paints to stormwater.

- Perform all body repair activities indoors or undercover.
- Keep the amount of airborne dust to a minimum. Use vacuum attachments on sanding equipment whenever possible.
- Utilize plastic barriers or tarpaulins during blasting or painting operations to contain debris.
- Sweep, vacuum, or use other dry cleanup methods routinely to pick up dust from dry sanding of primer, metal, or body filler.
- Use solvents with low volatility and coatings with low volatile organic compounds (VOC) content.
- Mix paints and solvents in designated areas away from drains, ditches, and waterways.
- DO NOT use water to control overspray or dust in the paint booth unless the water evaporates in the booth.
- Store waste paint, solvents, and rags in covered containers to prevent evaporation in the atmosphere.
- DO NOT clean out brushes or rinse paint containers into the dirt, street, gutter, storm drain, or waterways. “Paint out” brushes as much as possible.
- Prohibit washing paint equipment outside on pavement or into storm drains.
Vehicle and equipment washing and fueling should always be conducted at approved and designated areas at the airport, away from storm drains.

**VEHICLE & EQUIPMENT WASHING:**

- Wash at designated wash rack using minimal water.
- Use detergents that meet EPA’s Safer Choice Standard.
- Follow posted directions for wash rack or wash area use.
- DO NOT wash personal vehicles at the airport.
- Utilize a bucket of water and sponge to eliminate excess water, where applicable.

**VEHICLE & EQUIPMENT FUELING:**

- Perform fueling in designated areas only, away from storm drains.
- DO NOT top off and always remain vigilant during fueling.
- DO NOT hose off fueling area.
- Maintain ample supply of spill cleanup materials near fueling areas.
- Check for proper operation of shut off controls on fuel dispensing nozzles.
- Inspect storage tanks, hoses and nozzles daily for cracks and leaks.
- Ensure safe drains are closed during fueling operations.
ROADWAY, RUNWAY, AND TAXIWAY MAINTENANCE BMPs

• Avoid work during rain.
• Protect storm drain inlets and waterways.
• If work cannot be completed within one day, provide protection from pollution and safety hazards before leaving site for the day.
• Use berms around stockpiled material and locate stockpile down slope and away from storm drain inlets and waterways.
• Park equipment and store supplies away from waterways and storm drain inlets.
• Place drip pans under paving equipment when not in use.
• Remove residue from grinding/saw cutting operations from the work area by vacuuming.
• Collect and properly dispose/recycle excavated material from resurfacing activities.
• Sweep the work area when maintenance activities are completed.
• Clean tools and machinery in a manner where rinse water is collected and disposed of properly to the sanitary sewer.

CONCRETE PAVING

• Create a concrete wash area and prevent wash water from entering MS4.
• Locate washout at least 50 feet away from storm drains.

CURB AND GUTTER REPLACEMENT

• Ensure BMPs are in place to prevent discharge of pollutants into the storm drains.
• Remove any accumulated debris.

PAINTING

• Conduct paint loading operations away from storm drains.
• Use drop cloths or equivalent for paint mixing.
• Prevent paint drips from entering storm drains.
• Ensure any spilled paint or glass beads are immediately cleaned up.
BUILDING MAINTENANCE BMPs

CARPENTRY AND WELDING

• Store used lubricant oil in secondary containment.
• Use tools that have a vacuum or filter system to reduce airborne sawdust.
• Sweep or vacuum every day and dispose waste in a covered bin.

PAINTING

• Conduct painting in paint booth or indoors when possible.
• Use a tarp or similar device if painting outdoors and ensure it is not raining.
• Store paint in sound containers to prevent leaks.
• Mix paint over secondary containment.
• Clean brushes and materials using a containment system such as a solvent washer, bucket, or sink connected to the sanitary sewer.
• Properly segregate and label waste paints for disposal according to the solid waste BMPs. Oil based paints, however, are considered hazardous wastes.

JANITORIAL SERVICES

• Use less hazardous substances such as citrus based cleaners.
• Store cleaning chemicals in accordance with material storage BMPs. Check expiration dates.
• Refer to the Universal Waste BMPs for managing spent fluorescent lights.

PROTECT STORM DRAINS – If wastewater enters the storm drain, DOH must be notified at (808) 586-4309.
LANDSCAPE AND VEGETATIVE MANAGEMENT
FERTILIZER, PESTICIDE, AND HERBICIDE-APPLICATION BMPs

Maintenance Baseyard personnel are involved in many landscaping activities throughout the airport. This may include vegetation management, adding fertilizers, or applying herbicides or pesticides. Proper management of landscape activities is important in preventing contaminants from entering HNL’s MS4.

LANDSCAPE MANAGEMENT BMPs

- Check for proper operation on all controls, valves, and hoses prior to going into the field.
- Use a weed blocking geotextile where applicable.
- Dispose of clippings, leaves, and other green waste properly.
- Protect storm drains and surface water bodies.
- Store handheld equipment over drip pans.

FERTILIZER BMPs

- Use fertilizer only where needed. Do not over apply.
- Follow recommended usage instructions.
- Store fertilizers in accordance with the Material Storage BMPs to minimize contact with stormwater runoff.
- Perform soil analysis to determine the need and composition of fertilizer required. Calculate the rate of application based on available soil nutrients.
- Till the fertilizer into the top 4-inches to prevent it from being carried away as runoff.
- Do not apply if rain is predicted.
- Do not apply on slopes greater than 3:1.

HERBICIDE AND PESTICIDE APPLICATION

- Control vegetation with non-chemical means first.
- Mix and store chemicals in secondary containment.
- Spot spray.
- Do not apply during high winds or if rain is predicted.
- Do not spray within 6 feet of a water body.
- Dispose empty containers by rinsing three (3) times with water. Reuse rinse water.
- Keep a log of all fertilizer, herbicides, and pesticides stored, used, and disposed of and ensure those logs are provided to the Environmental Health Specialist.
A variety of products and materials are used at the Maintenance Baseyard that may adversely affect water quality, and therefore require BMPs to minimize exposure of such products to stormwater.

- Store materials in their original or appropriate containers as recommended by manufacturer.
- Store materials and containers indoors or in covered areas.
- Provide secondary containment sufficient to hold the volume of the largest container plus freeboard if storing outdoors or not undercover.
- Store all flammable materials within flammable storage lockers.
- Ensure all containers are closed and secured to prevent movement, stored neatly, and properly labeled.
- Maintain inventory of stored supplies.
- Maintain ample supply of spill cleanup materials near storage areas.
- Compile Safety Data Sheets (SDS) for all chemical substances.
- Use absorbent materials to contain any spills. Clean spills with rags or absorbent material promptly, and dispose of cleaning materials properly.
- Inspect material storage areas daily and conduct dry sweeping.
SOLID WASTE STORAGE AND DISPOSAL BMPs

The chemicals used at the airport may ultimately require waste management. Proper handling of solid wastes are important in reducing contaminants from entering the stormwater runoff.

- Use the entire product before disposing of the container.
- Inspect containers regularly and transfer waste from damaged containers into intact containers.
- DO NOT clean out brushes or rinse paint containers into storm drain or stream. “Paint out” brushes as much as possible.
- DO NOT mix wastes. This can cause chemical reactions, make recycling impossible, and complicate disposal.
- Arrange for regular waste collection before containers reach capacity.
- Conduct employee training annually and as required.
- Store used oil in appropriate containers, label containers clear with the words “Used Oil,” and provide secondary containment.
Universal waste is a category of waste materials designated as “hazardous waste,” but it often contains materials that are very common. Universal waste is defined in 40 C.F.R. 273.9 by the EPA. Universal waste regulations apply to these four types of waste: batteries, pesticides, mercury-containing equipment, and lamps. Examples of universal waste include unused or recalled pesticides, mercury containing thermostats, and discarded lamps (lights or bulbs) such as fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps.

**STORAGE**

- Store in a closed, structurally sound container and label as “universal waste – (insert type of waste here)” including the date when the waste first began to accumulate in the container.
- Place all universal waste containers in secondary containment.
- Can be stored for up to one (1) year, after that the facility is subject to hazardous waste regulations.
- Small quantity handlers can store up to 11,000 lbs. If this amount is exceeded, the facility is considered a large quantity handler and must maintain a manifest and related documents for three (3) years.

**DISPOSAL**

- Contact a universal waste recycler to ship waste to a recycling facility.
- Dispose of the universal waste within one (1) year of the accumulation start date.

**TRANSPORT**

DOT personnel may transport universal wastes within the airport fence line. However, they are not authorized to transport universal waste on public roads. Call contractor for proper waste disposal.
HAZARDOUS WASTE BMPs

Hazardous wastes are listed in 40 CFR 261 or in the Safety Data Sheet (SDS) Section 2. Physical or chemical analysis of a waste sample performed by a contractor can also be used to determine if a product is hazardous. If you are uncertain about whether an item is a hazardous waste, treat it as such until you determine otherwise and contact your Baseyard supervisor or Environmental Health Specialist for assistance.

HAZARDOUS WASTES AT HNL:
- Used absorbent for hazardous waste cleanup.
- Aerosol cans that contain product.
- Wastes that failed lab test (e.g., brake fluid, spent solvent and used oil that has been mixed with a hazardous waste or displays characteristics of a hazardous waste).
- Oil based paint.
- Broken universal waste (fluorescent bulbs).

STORAGE
- Store in a closed, structurally sound container and label it using hazardous waste markings, including the accumulation start date.
- Place all hazardous waste containers in secondary containment.
- Designate an indoor or covered hazardous waste collection area.
- Conduct regular inspections of storage areas.

DISPOSAL
- Ensure that hazardous waste or chemicals are not disposed of in dumpsters.
- Disposal contractor will ship wastes to a disposal facility.
- Ensure contractor determines if it can be recycled.
- Retain disposal manifests for three (3) years.

DOT personnel may transport hazardous waste within the airport fence line, but NOT on public roads.

Very Small Quantity Generators (VSQG) can generate up to 100 kilograms (kg) or less per month and can store up to 1,000 kg total. There is no time limit for accumulation prior to disposal.

Small Quantity Generators (SQG) generate between 100 kg and 1,000 kg per month and can store up to 6,000 kg total. SQGs may accumulate hazardous waste on-site for 270 days without a permit.

Large Quantity Generators (LQG) generate anything greater than 1,000 kg per month.

An EPA ID number, disposal manifests, training, and emergency procedures are required for all SQGs and LQGs.
SPILL PREVENTION AND RESPONSE PRACTICES

The Spill Prevention, Control, and Countermeasure (SPCC) Plan ensures that releases are prevented and properly cleaned up if they do occur (Refer to 40 CFR 112).

OIL PRODUCTS AT MAINTENANCE BASEYARD

- Gasoline & Diesel (USTs)
- 280-gallon used oil AST
- 55-gallon drums of new and used oil

REQUIRED INSPECTIONS

- Visual inspection of piping and tank prior to use. Look for signs of weakness, leaking, bulging, blistering, discoloration, or corrosion.
- Monthly written inspection of storage containers completed by supervisor.
- Comprehensive inspections (integrity testing) every five (5) years on bulk ASTs.

SPILL RESPONSE

- Wear proper PPE.
- Access facility spill kit.
- Notify Baseyard supervisor.
- Stop and contain the spill.
- Block entry to area.
- Dispose of absorbents and spill material properly (for petroleum products, ensure liquids are absorbed, double bagged, and properly disposed).
- Document the release and notify proper authorities (i.e., Ramp Control, AIR-EE, National Response Center, Department of Health).
- If the spill is too large to handle, notify a spill response contractor.