



BURLINGTON INTERNATIONAL AIRPORT

Annual Report for General Permit 3-9014 (MS-4)

and

Annual Report for Operational Stormwater Discharge Permits

April 1, 2012

National Pollutant Discharge Elimination System (NPDES)
Number: VTR040000 for Stormwater Discharges from Small
Municipal Separate Storm Sewer Systems (MS-4)

and

Operational Stormwater Discharge Permits
including:

- Permit No. 3028-9010.A (BTV's Master Permit)
- Permit No. 1-1391 (South Apron Expansion)
- Permit 1-0839 (Redirect Airfield Drainage to North Outfall)
- Permit No. 3028-INDS.A (Taxiways 'B', 'C', 'J', and 'G')
- Permit No. 3028-INDS.1 (Reconstruct, Mark & Groove Runway 15-33)
- Permit No. 3845-INDS.A (Heritage Flight)

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Table of Contents

1.0 CONSOLIDATION OF REPORTING	3
2.0 ANNUAL REPORT FOR GENERAL PERMIT 3-9014 (MS-4)	4
2.1 INTRODUCTION	4
2.1.1 Background.....	4
2.2 REPORTING CONDITION 5.3.1.	5
2.2.1 Six Minimum Control Measures	5
2.2.1.1 Minimum Measure #1 - Public Education and Outreach.....	5
2.2.1.2 Minimum Measure #2 - Public Participation/Involvement	6
2.2.1.3 Minimum Measure #3 – Illicit Discharge Detection and Elimination	8
2.2.1.4 Minimum Measure #4 – Construction Site Runoff Control.....	9
2.2.1.5 Minimum Measure #5 – Post-Construction Runoff Control.....	10
2.2.1.6 Minimum Measure #6 – Pollution Prevention/Good Housekeeping.....	11
2.2.2 Special Conditions	12
2.2.2.1 Water Quality Controls for Discharges to Impaired Water Bodies	12
2.2.2.2 Consistency with Total Maximum Daily Load (TMDL) Requirements	12
2.2.2.3 Source Water Protection Requirements	14
2.2.2.4 Stormwater Management Program (SWMP)	14
2.3 REPORTING CONDITION 5.3.2.	14
2.4 REPORTING CONDITION 5.3.3.	15
2.5 REPORTING CONDITION 5.3.4.	15
2.6 REPORTING CONDITION 5.3.5.	16

3.0 ANNUAL REPORT FOR OPERATIONAL STORMWATER DISCHARGE PERMITS	17
3.1 INTRODUCTION	17
3.2 ANNUAL INSPECTION REPORT FORMS	17
3.2.1 Permit No. 3028-9010.A (BTV’s Master Permit).....	18
Annual Inspection Report Form	18
- Maintenance Inspection Checklist	18
- Statement of Compliance	19
3.2.2 Permit No. 1-1391 (South Apron Expansion).....	20
Annual Inspection Report Form	20
- Maintenance Inspection Checklist	20
- Statement of Compliance	21
3.2.3 Permit 1-0839 (Redirect Airfield Drainage to North Outfall).....	22
Annual Inspection Report Form	22
- Maintenance Inspection Checklist	22
- Statement of Compliance	23
3.2.4 Permit No. 3028-INDS.A (Taxiways 'B', 'C', 'J', and 'G')	24
Annual Inspection Report Form	24
- Maintenance Inspection Checklist	24
- Statement of Compliance	25

Stantec

**Burlington International Airport
Annual Report for General Permit 3-9014 (MS-4) and
Annual Report for Operational Stormwater Discharge Permits
April 1, 2012**

3.2.5	Permit No. 3028-INDS.1 (Reconstruct, Mark & Groove Runway 15-33)	26
	Annual Inspection Report Form	26
	- Maintenance Inspection Checklist	26
	- Statement of Compliance	27
3.2.6	Permit No. 3845-INDS.A (Heritage Flight)	28
	Annual Inspection Report Form	28
	- Maintenance Inspection Checklist	28
	- Statement of Compliance	29

Table of Appendices

- Appendix A - Annual Report Consolidation E-mail Correspondence
- Appendix B - Regional Stormwater Education Program Annual Review 2011-2012
- Appendix C - MCM #2, Chittenden County Stream Team, Summary of Activities: 2011
- Appendix D - Construction General Permits issued in 2011
- Appendix E - Operational Stormwater Discharge Permits issued in 2011
- Appendix F - Previously Issued Operational Stormwater Discharge Permits
- Appendix G - Field Inspection Maintenance Recommendations

1.0 CONSOLIDATION OF REPORTING

The City of Burlington, Burlington International Airport (herein referred to as BTV) currently is subject to six operational Stormwater Discharge Permits, a Municipal Separate Storm Sewer System General Permit (3-9014, MS4), a Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (3-9003, MSGP), and a comprehensive *Stormwater Management Program* (SWMP). Permit compliance conditions vary for each permit according to the date of issuance, permitting rules at the time of issuance, number of discharge points, and whether the receiving water is impaired or not.

Reporting requirements, including dates of submission for Annual Reports, have varied widely in the past between the multiple permits. For instance, Annual Reports for four of the six Stormwater Discharge Permits were previously due on July 15 of each year. The Annual Reports for the two remaining Stormwater Discharge Permits were due on January 31 and September 30 of each year. To compound matters further, the Annual Report for General Permit 3-9014 (MS4) was due on February 1 of each year, while the Annual Report for General Permit 3-9003 (MSGP) was due no later than forty five days after completion of the annual Comprehensive Site Inspection.

In order to consolidate BTV's annual reporting requirements, a proposal was developed and subsequently agreed upon by Vermont Agency of Natural Resources, Stormwater Program personnel. The agreement provides for consolidation of Annual Reports including the six operational Stormwater Discharge Permits, General Permit 3-9014 (MS4), and General Permit 3-9003 (MSGP) to all be submitted on April 1 of each year. The first such consolidation will occur with submission of this report on April 1, 2012. It shall be noted that changes to submission deadline requirements for BTV's existing Underground Injection Control (UIC) Permits are not included under this consolidation.

Additionally, it was proposed that in lieu of submitting eight separate Annual Reports (one for each separate permit), BTV will submit a single comprehensive Annual Report including all required documentation for the eight separate permits. However, during preparation of this report, it became clear that separating the Annual Report for General Permit 3-9003 (MSGP) into a separate report provided for better organization. See **Appendix A** for e-mail correspondence related to consolidation of BTV's permit reporting.

It is noted that BTV was issued a seventh operational Stormwater Discharge Permit (#3028-INDS.2 as contained in **Appendix E** for reference) on December 7th, 2011 for the Vermont Aviation Center project (formerly entitled the Burlington Aviation Technical Center and Vermont Flight Academy project). At this time, the project has not been constructed and is therefore, not yet subject to permit reporting conditions.

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2.0 ANNUAL REPORT FOR GENERAL PERMIT 3-9014 (MS-4)

2.1 INTRODUCTION

In accordance with Section 5.3 Reporting, contained in General Permit 3-9014, the Burlington International Airport (BTV) is required to submit an annual report overviewing the status of compliance with permit conditions by April 1 of each year of the permit term.

2.1.1 Background

The 1987 Amendment to the Federal Clean Water Act (CWA) of 1972 (CWA 402(p)(5)) directed the Environmental Protection Agency (EPA) to address the problems of flooding, water pollution and public health threats caused as a result of stormwater runoff from developed lands or as commonly termed, urban stormwater runoff. This runoff from roads, rooftops and other impervious surfaces associated with developed lands causes erosion/property damage; endangers or destroys aquatic wildlife and wildlife habitats; causes unhealthy algal blooms; and endangers public health via contact during recreation sports by contaminating source water used for public water supplies.

The CWA required that the EPA address urban stormwater runoff in a phased approach starting with the largest urban areas in the United States based on population census data. In November 1999, the EPA issued new federal stormwater regulations known as the Phase II Stormwater Rule for metropolitan areas of less than 100,000 people.

Under the Phase II Rule, nine municipalities in Vermont with municipal separate storm sewer systems (MS4) are required to seek coverage under the MS4 General Permit or apply for an individual permit. These are Burlington, South Burlington, Colchester, Milton, Winooski, Essex, Essex Junction, Williston and Shelburne. In addition to these municipalities, three publicly owned, non-traditional separate storm sewer systems have also been designated and are required to seek coverage. These systems are owned or operated by the University of Vermont, Burlington International Airport (BTV) and the Vermont Agency of Transportation.

The MS4 General Permit is a National Pollutant Discharge Elimination System (NPDES) permit and has a five-year permit term. The requirements of this MS4 General Permit apply to areas served by each MS4 that are located within either the U.S. Census Bureau designated urban area (UA) or watersheds that are principally impaired by stormwater and so classified by the Vermont Agency of Natural Resources, Department of Environmental Conservation (DEC).

As a permit condition, each MS4 must develop, implement and enforce a Stormwater Management Program (SWMP) designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act. Implementation of best management practices consistent with the provisions of the

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Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

SWMP required pursuant to this permit constitutes compliance with the standard of reducing pollutants to the "maximum extent practicable".

The SWMP must be developed and implemented by the expiration date of the MS4 permit, and must include information for the minimum control measures as described in the permit.

There are six minimum control measures required of each designated permittee under the MS4 General Permit: (1) *Public Education and Outreach*, (2) *Public Participation/Involvement*, (3) *Illicit Discharge Detection and Elimination*, (4) *Construction Site Runoff Control*, (5) *Post-Construction Runoff Control*, and (6) *Pollution Prevention/Good Housekeeping*.

Each MS4 must also comply with certain special conditions, including: *Water Quality Controls for Discharges to Impaired Water bodies*, *Consistency with Total Maximum Daily Load (TMDL) Requirements and Source Water Protection requirements*.

In June 2003, BTV filed a Notice of Intent for General Permit 3-9014. The Notice of Intent (NOI) included a narrative that outlined how BTV planned to comply with the six minimum control measures and special conditions noted above. Subsequently, BTV submitted an updated NOI and complete SWMP in April, 2008. Since submittal of the 2008 NOI, BTV has implemented or is in the process of implementing many of the BMP's proposed under the six minimum measures.

In accordance with Section 5.3 Reporting, of General Permit 3-9014, BTV is required to submit an annual report discussing the status of compliance with the permit by April 1 of each year as noted above. Conditions set forth in Section 5.3 Reporting, are listed below with descriptions of the current status of each requirement noted in **bold type**.

2.2 REPORTING CONDITION 5.3.1.

The 2011 Annual Report includes the status of BTV's compliance with permit conditions, an assessment of the appropriateness of the identified BMP's, progress toward achieving the statutory goal of reducing the discharge of pollutants to the MEP, and the measurable goals for each of the minimum control measures and special conditions.

2.2.1 Six Minimum Control Measures

2.2.1.1 Minimum Measure #1 - Public Education and Outreach

1) **BMP # 1:** BTV will continue to work with the Chittenden County Regional Stormwater Education Program (RSEP) in the continuing pursuit to educate the public as it relates to water quality issues.

Status: **Implemented.** A water quality website, www.smartwaterways.org, has been developed by the RSEP and is currently operational. This website was first developed in 2009 and was redesigned in 2010. **Appendix B** contains the RSEP Annual Review for 2011-2012.

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Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

BTV has also provided an environmental page on the airport website. The BTV website address is <http://www.btv.aero>. Links to the MS4 annual reports, the RSEP website and the City of Burlington stormwater management websites are included on the environmental page of the website. The environmental page address is http://www.btv.aero/about_us/environmental.html

Timeframe: Not applicable.

Measurable Goals: Stormwater behavior changes in the public. This change will be assessed through a behavior survey conducted by the RSEP approximately every 5 years. The contractor responsible for conducting the survey will report findings to the RSEP. **Appendix B contains the RESP Annual Review for 2011-2012.**

Person(s) Responsible for BMP: The RSEP.

Rationale for Selection: With an ever increasing number of people utilizing the internet on a daily basis, a website is a cost effective way to reach the public and educate them about water quality related issues.

2.2.1.2 Minimum Measure #2 - Public Participation/Involvement

1) BMP # 1: The Chittenden County Regional Planning Commission (CCRPC) is in the process of creating a Chittenden County Stream Team (CCST). This Team will become the community outreach of the CCRPC related to stormwater issues.

Status: In the fall of 2009, nine MS4 communities located in Chittenden County began to discuss a potential collaborative approach to fulfilling their Minimum Control Measure #2 requirement. At the request of these MS4s, the Chittenden County Regional Planning Commission (CCRPC) applied for and received two grants totaling \$22,500. Using these grants, CCRPC developed a regional pilot project called the Chittenden County Stream Team (CCST). In its pilot year, CCST created a logo, launched a website and Facebook page, surveyed local residents, hosted a number of workshops, and completed a variety of local projects.

The success of the pilot project led to the formal adoption of the CCST program by eight of the MS4 communities in 2011. The program was put out to bid and awarded to the Winooski Natural Resources Conservation District (WNRCD), a regional entity focused on natural resource protection and management. With support from CCRPC and the participating MS4 communities, WNRCD worked to expand the reach of CCST. This was done by focusing efforts in three main areas: Social Media, Projects, and Outreach/Events. Note that at this time Colchester has elected not to join the CCST effort. The Summary of Activities completed by the CCST for 2011 is contained in **Appendix C**.

Timeframe: Contingent on the goals and timeframes of those goals by the organization.

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Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

Measurable Goals: The program will engage citizens across an eight-town area in implementing programs to reduce non-point source pollution and stormwater volume at the local level to enable compliance by these MS4 permittees with MM#2. The program will utilize social networking tools to form a cadre of concerned citizens and professionals interested in hands-on activities to reduce the harmful effects of stormwater. The program will then organize a series of events and workshops to engage the Stream Team members and citizens at large in discussion and use of key Best Management Practices designed to address the negative effects of stormwater. The scope of services for the CCST is as follows:

1. Regular Tasks:

- Maintain Facebook page with regular postings;
- Maintain website with up to date information on stormwater related workshops and projects sponsored by CCST as well as other partners;
- Recruit and maintain volunteers from member communities, recruit neighborhood leaders to help spread the word and build esprit de corps by articulating the mission and vision of CCST, staying in touch with volunteers and keeping it fun!
- Organize quarterly Steering Committee meetings and communicate with members between meetings.
- Build relationships with and leverage expertise from other organizations working on water quality issues (i.e. Friends of the Winooski, Winooski Natural Resources Conservation District, Lake Champlain Committee, Green Up Day, Lake Champlain Basin Program) including potential joint sponsorship of workshops and projects.

2. Event-driven tasks

- Host a Spring kickoff event to get neighborhood leaders in touch with one another and excited about the upcoming field season;
- Hold outreach events at spring farmers' markets or other spring/early summer events in three municipalities per year to continue to reach new volunteers;
- Complete three workshops or projects in each year with at least one event in each of the areas of the full members over the five year permit period;
- Provide guidance to volunteers on techniques and materials they can use to host their own projects or workshops.

3. Annual Tasks

- Prepare an annual summary including the number of events, number of participants and other measureable quantities showing how CCST met the MM-#2 requirements that members can use in their annual reports to Vermont ANR.

Person(s) Responsible for BMP: The CCST.

Rationale for Selection: The CCRPC is creating a program to support and extend the stormwater mitigation efforts in the County's impaired waters. The CCRPC believes that their pilot project implemented from Spring 2010 through Spring 2011 was a success. They feel they can carry that momentum with a designated stormwater program.

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Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

2.2.1.3 Minimum Measure #3 – Illicit Discharge Detection and Elimination

- 1) **BMP # 1:** A plan to detect and eliminate all illicit discharges will be developed, implemented and enforced as part of the SWMP.

Status: **Completed.** A complete SWMP was submitted in April, 2008 for Vermont Agency of Natural Resources (VT. ANR) review, and subsequently approved.

Timeframe: The SWMP will be reviewed and updated (as required) by December 31st of each year.

Measurable Goals: Measurable goals of this BMP as outlined in the 2003 NOI, and status of these goals are as follows:

- 1) BTV will review and update the SWMP each year.

Vermont Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, MSGP 3-9003, National Pollution Discharge Elimination System (NPDES) Number VTR050001, became effective on August 4, 2011. In order to renew the previous authorization, BTV submitted an NOI on August 17, 2011. Subsequently, the Stormwater Pollution Prevention Plan (SWPPP) as prepared by VHB in 2008 was revised and updated by Stantec in 2011.

No major revisions to the SWMP other than updating the SWPPP were required for 2011.

- 2) BTV will complete outfall monitoring as outlined in the monitoring schedule contained in the SWPPP (see SWMP – Volume 2).

BTV has completed outfall monitoring in accordance with the SWPPP for the 2011 – 2012 de-icing season.

- 3) BTV will conduct annual trainings for airport staff and tenants.

BTV sent six (6) employees to the municipal employee training workshop held on September 15, 2011.

- *Person(s) Responsible for BMP:* The Burlington International Airport's illicit discharge detection and elimination plan and each of the associated activities will be implemented and overseen by the **Stormwater Management Program Manager**, who is responsible for the overall coordination of the storm water management program at the airport. BTV's Stormwater Management Program Manager is Heather Kendrew, P.E., Director of Maintenance, Engineering & Environmental Compliance.

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Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

Rationale for Selection: Development and implementation of a plan to detect and eliminate illicit discharges, as well as continuation of the ongoing BTV stormwater study program, are paramount to meeting and achieving the goals outlined in the MS4 General Permit.

- 2) **BMP # 2:** An employee questionnaire will be developed in conjunction with ANR and circulated which will help evaluate the success of the program. Questions asked will help determine the level of awareness of storm water pollution and water quality issues and allow for suggestions to be made. The questionnaires may also provide BTV with additional information regarding discharges from tenants.

Status: **The survey has previously been developed.**

Timeframe: BTV will develop a draft of the questionnaire and provide to ANR for review by June 2008. The questionnaire will be completed and distributed to employees and tenants by June 2009.

Measurable Goals: BTV will distribute 500 questionnaires to employees and tenants by June 2009.

BTV will continue to distribute this questionnaire to its employees and tenants during the annual badging process.

Person(s) Responsible for BMP: The Burlington International Airport's illicit discharge detection and elimination program and each of the associated activities will be implemented and overseen by the **Stormwater Management Program Manager**, who is responsible for the overall coordination of the storm water management program at the airport

Rationale for Selection: Soliciting input from employees and tenants not only helps to educate them, but allows us to gage relative successes or failures of efforts to date.

2.2.1.4 Minimum Measure #4 – Construction Site Runoff Control

- 1) **BMP # 1:** A plan to prevent or reduce pollutants in construction site runoff will be developed, implemented and enforced as part of the SWMP.

Status: **Completed. The Construction Site Runoff Control Plan is contained in SWMP, Volume 1 – Section 5.**

Timeframe: The SWMP will be reviewed and updated (as required) by December 31st of each year.

Measurable Goals: All new projects will be covered by the applicable State stormwater permit and/or conform to BTV policy.

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Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

BTV submitted one Construction General Permit 3-9020 application during the reporting period. Authorization of Notice of Intent #3028-9020.4 for the Vermont Aviation Center project was issued on November 7, 2011. The Authorization of Notice of Intent, Notice of Authorization, and the NOI are contained in Appendix D for reference. Construction for this project has not begun to date.

BTV did not conduct any projects under one acre that required reporting per BTV policy.

Person(s) Responsible for BMP: The Burlington International Airport's construction site runoff control plan and each of the associated policies will be implemented and overseen by the **Stormwater Management Program Manager**, who is responsible for the overall coordination of the storm water management program at the airport.

Rationale for Selection: Development and implementation of a plan to prevent or reduce pollutants in construction site runoff, including compliance with the ANR CGP, is the most effective way to ensure appropriate protection of waters of the state during construction activities.

2.2.1.5 Minimum Measure #5 – Post-Construction Runoff Control

- 1) **BMP # 1:** A plan to prevent or reduce pollutants in post-construction site runoff will be developed, implemented and enforced as part of the SWMP.

Status: **Completed. The Post-Construction Runoff Control Plan is contained in SWMP, Volume 1 – Section 6.**

Timeframe: The SWMP will be reviewed and updated (as required) by December 31st of each year.

Measurable Goals: 1) All new projects will be covered by the applicable State stormwater permit and/or conform to BTV policy.

In order to identify projects that may require an operational Stormwater Discharge Permit, the following processes have been followed:

- **Meet with VT ANR Stormwater Section personnel to discuss and review the project during design phase.**
- **Follow direction or finding(s) provided by VT ANR Stormwater Section personnel as to whether or not an operational Stormwater Discharge Permit is required.**
- **Document direction or finding(s) in meeting notes or meeting minutes.**

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Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

BTV submitted one Individual Stormwater Permit application during the reporting period. Permit #3028-INDS.2 for the Vermont Aviation Center project was issued on December 7, 2011.

See Appendix E for the approved permit for this project.

No post-construction site inspections were required to be completed in 2011. Post-construction site inspections will be completed in 2012 for the following project:

- **Permit #3028-INDS.1 - BTV Reconstruct, Mark & Groove Runway 15-33; AIP No. 3-50-005-2010**

Person(s) Responsible for BMP: The Burlington International Airport's post construction runoff control plan and each of the associated policies will be implemented and overseen by **Stormwater Management Program Manager**, who is responsible for the overall coordination of the storm water management program at the airport.

Rationale for Selection: Development and implementation of a plan to prevent or reduce pollutants in post-construction site runoff, including compliance with the ANR Stormwater Rule, is the most effective way to ensure appropriate protection of waters of the state following the completion of construction activities.

2.2.1.6 Minimum Measure #6 – Pollution Prevention/Good Housekeeping

1) **BMP # 1:** A plan to ensure good housekeeping practices and pollution prevention will be developed, implemented and enforced as part of the SWMP. The plan will be developed and implemented such that it also meets the requirements of the SWPPP as outlined in the MSGP.

Status: **Completed.** The Burlington International Airport is a non-traditional MS4 and it has coverage under the NPDES Phase II Multi Sector General Permit (MSGP). One condition under the MSGP is development of a Storm Water Pollution Prevention Plan (SWPPP) that includes measures for pollution prevention and good housekeeping. BTV has included the SWPPP as Volume 2 of the SWMP to meet the requirements of this BMP. As previously discussed, the SWPPP was revised and updated by Stantec in 2011.

Timeframe: The SWMP will be reviewed and updated (as required) by December 31st of each year.

Measurable Goals: Annually, all catch basins will be inspected and cleaned if necessary. In the event that a catch basin with a standard sump depth of 24" is inspected and found to contain greater than 12" depth of sediment, a recommendation will be made to clean out the sump.

All catch basins were inspected in Summer/Fall 2011. A listing of catch basins requiring maintenance is presented in Appendix G.

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Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

The catch basins will be inspected again in late summer/early fall and maintenance of these catch basins will be performed during the spring of 2012.

Person(s) Responsible for BMP: The Burlington International Airport's pollution prevention and good housekeeping plan and each of the associated policies will be implemented and overseen by **Stormwater Management Program Manager**, who is responsible for the overall coordination of the storm water management program at the airport.

Rationale for Selection: Development and implementation of a plan to prevent or reduce pollutants in site runoff and encourage good housekeeping and pollution prevention practices is the most effective way to ensure appropriate protection of waters of the state.

2.2.2 Special Conditions

2.2.2.1 Water Quality Controls for Discharges to Impaired Water Bodies

Under Section 3.1.2 of the MS4 General Permit, each MS4 discharging to a 303(d) listed (impaired) water body must control to the maximum extent practicable the discharge of the pollutants of concern to those waters, and be in compliance with all requirements of any applicable TMDL's or watershed general permits issued for those waters. BTV has discharges to two such water bodies: Potash Brook (4 outfalls) and Muddy Brook (1 outfall).

Potash Brook is principally impaired due to collected stormwater runoff. Pollutants of concern include sediment, pathogens, toxics, organic enrichment and temperature. As of April 1, 2012, a TMDL dated December 19, 2006 has been issued by ANR for Potash Brook. Upon issuance of the new MS4 permit, BTV will provide ANR with necessary information to determine waste load allocations for Potash Brook.

General Permit 3-9030 for Designated Discharges to the Bartlett, Centennial, Englesby, Morehouse, and Potash Brook Watersheds was issued on November 19, 2009 by ANR. However, the General Permit 3-9030 is not applicable to BTV since coverage is provided under the airport's existing MS4 General Permit and the Multi Sector General Permit (MSGP) permit.

Muddy Brook is principally impaired due to collected stormwater runoff. Pollutants of concern include toxics, nutrients, and temperature. No TMDL has been issued by ANR to date for Muddy Brook. In addition, no watershed general permit similar to that of General Permit 3-9030 has been issued to date for the Muddy Brook watershed.

2.2.2.2 Consistency with Total Maximum Daily Load (TMDL) Requirements

Under Section 3.1.3 of the MS4 General Permit, each MS4 must be consistent with applicable recommendations in the implementation section of the Lake Champlain TMDL and any future TMDLs for impaired waters affected by the MS4 established or approved by EPA pursuant to section 303(d) of the federal Clean Water Act. The Lake Champlain Phosphorous TMDL recommendations include: Erosion

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Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

and Sediment Control at Construction Sites; Better Back Roads; and, Local Municipal Actions (including promotion of riparian buffers and impervious surface minimization.)

A. Erosion and Sediment Control at Construction Sites:

This recommendation in the TMDL is designed to minimize the amount of soil erosion during construction such that minimal amounts of soil move offsite or into waters of the state. BTV activities are consistent with following this recommendation. **BTV will continue to comply with conditions of the MS4 General Permit, the Multi Sector General Permit, and the ANR General Permit for Stormwater Runoff from Construction Sites, all of which require substantial consideration for erosion prevention and sediment control.**

Goals of all future BTV development will include: fitting the development plan to the site where possible; preserving existing natural drainage ways and vegetation to the maximum extent practicable; minimizing areas of disturbed soils; minimizing the duration of soil disturbance; prevent erosion by managing stormwater runoff; and, installing sediment control measures to prevent sedimentation of receiving waters.

B. Better Back Roads:

This recommendation in the TMDL is designed to prevent sediment and phosphorous due to road erosion from polluting waters of the state. It includes planning that considers the potential and adequacy of infrastructure, upgrade of infrastructure to reduce flash flood susceptibility, and employing good driveway access standards and methods to reduce road length in developments.

Because of the nature of the BTV site, and the fact that its infrastructure consists primarily of paved roads, parking areas, runways, buildings and hangars, the "Better Back Roads" TMDL recommendation is not applicable.

C. Local Municipal Actions:

This recommendation in the TMDL is designed to encourage municipalities to develop additional policies and actions to protect riparian buffer zones and reduce the creation of impervious surfaces by new development.

1) Riparian Buffers: The TMDL recommends adoption in the zoning bylaws of a minimum setback and buffer requirement on all rivers, streams, lakes and ponds. **Regulations for these buffers are controlled by the City of South Burlington Land Development Regulations. Because the airport is located in South Burlington, BTV is required to comply with these regulations.**

2) Impervious Surface Minimization: The TMDL recommends alteration or development of zoning codes and development standards which encourage minimization of impervious surfaces and use of open vegetated channels for stormwater runoff. **These regulations**

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Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

are controlled by the City of South Burlington. Because the airport is located in South Burlington, BTV is required to comply with these regulations.

A majority of the BTV impervious area is treated by disconnection of impervious surfaces and infiltrated into the highly permeable sandy soils on-site. Any future development will be concurrent with the goals of maximizing overland flow, maximizing open space and minimizing impervious area to the maximum extent practicable.

2.2.2.3 Source Water Protection Requirements

Under Section 4.1.4 of the MS4 General Permit, if applicable, each MS4 must describe the process for consultation with and involvement of public water suppliers with source water protection zones within the MS4.

BTV has four such outfalls discharging to Potash Brook, which is in the headwaters of Shelburne Bay. Shelburne Bay is the drinking water watershed for the Champlain Water District (CWD). **BTV will notify CWD of future projects that discharge to Potash Brook and any future problems with existing outfalls that discharge to Potash Brook.**

2.2.2.4 Stormwater Management Program (SWMP)

As a permit condition, each MS4 must develop, implement and enforce a Stormwater Management Program (SWMP) designed to reduce the discharge of pollutants from the MS4. The SWMP will promote construction site runoff control, post construction runoff control and pollution prevention and good house keeping.

BTV has developed a SWMP to meet these requirements, and will continue to review and update the plan annually if necessary. The Stormwater Pollution Prevention Plan (SWPPP) was revised and updated by Stantec in 2011. No major updates to the SWMP other than updating the SWPPP were required for 2011.

2.3 REPORTING CONDITION 5.3.2.

The 2011 Annual Report will include results of information collected and analyzed, if any, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.

The Stormwater Pollution Prevention Plan (SWPPP) was revised and updated by Stantec in 2011. No major updates to the SWMP other than updating the SWPPP were required for 2011.

Stantec

Burlington International Airport Annual Report for General Permit 3-9014 (MS-4) and Annual Report for Operational Stormwater Discharge Permits April 1, 2012

2.4 REPORTING CONDITION 5.3.3.

The 2011 Annual Report will include a summary of the stormwater activities BTV plans to undertake during the next reporting cycle including an implementation schedule.

Current status and anticipated schedules for the next reporting cycle are as follows:

- a) **BTV Construct Aircraft Deicing Fluid Treatment System, 890 Ramp;
AIP No. 3-50-005-XX**
 - **Construction of this project is anticipated to commence in late summer or early fall of 2012 depending on availability of FAA funding. An Underground Injection Control (UIC) Permit Application was submitted for ANR review on March 2, 2012. Permit issuance is expected mid-May, 2012. No Stormwater Discharge Permit is required for this project as the project does not include any net increase to impervious surfaces. The work for this project was included in the Construction General Permit application for the BTV Reconstruct, Mark & Groove Runway 15-33 project. Re-application will be necessary prior to commencing construction.**

- b) **Vermont Aviation Center project**
 - **This project is in the design phase. Tentatively, construction completion is anticipated to be at the end of 2013. Stormwater Discharge Permit #3028-INDS.2 and the Authorization of Notice of Intent #3028-9020.4 have both been issued for this project.**

See Appendix D and Appendix E for a copy of the above referenced permits.

2.5 REPORTING CONDITION 5.3.4.

The 2011 Annual Report will include proposed changes to BTV's SWMP, including changes to any BMP's or any identified goals that apply to the program elements.

BTV's SWPPP, including site map and listing of BMP's, were updated for the following reasons:

- **To reflect re-authorization of General Permit 3-9003 (MSGP) dated August 4, 2011.**
- **To reflect the construction of several new BMP's covered under newly acquired operational Stormwater Discharge Permits since the previous SWPPP was developed in 2008.**

No changes to the SWMP other than updating the SWPPP dated April 1, 2012 were required for 2011.

Stantec

**Burlington International Airport
Annual Report for General Permit 3-9014 (MS-4) and
Annual Report for Operational Stormwater Discharge Permits
April 1, 2012**

2.6 REPORTING CONDITION 5.3.5.

The 2011 Annual Report will include notice that BTV is relying on another entity to satisfy some of the permit obligations, if applicable.

This condition is not applicable at this time.

End of BTV Annual Report for General Permit 3-9014 (MS-4) dated April 1, 2012