BURLINGTON INTERNATIONAL AIRPORT (BTV)
NOTICE OF INTENT NARRATIVE

For General Permit 3-9014
National Pollutant Discharge Elimination System (NPDES) Number: VTR040000
For Stormwater Discharges from Small Municipal Separate Storm Sewer Systems

I. 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, eight 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, 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 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 included a narrative that outlined how BTV planned to comply with the six minimum control measures and special conditions. Since the initial filing of the NOI, BTV has implemented or is in the process of implementing many of the BMP's proposed under the six minimum measures.

The following narrative summarizes BMP's proposed in the NOI filed and 2003, and subsequent actions taken by BTV to comply with the six minimum measures and special conditions.

II. Six Minimum Measures

Following are descriptions of how BTV intended to satisfy each of the six minimum measures, and what they have accomplished to date to satisfy the measures (**in bold**). Included are descriptions of each best management practice (BMP) chosen, the proposed timeframes for implementing each BMP, measurable goals of each BMP, name(s) of the person or persons responsible for implementing each BMP, and a rationale for how and why each BMP was selected.

A. Public Education and Outreach

As indicated in the NOI, this measure is met by BTV agreeing to and complying with the Regional Memo of Understanding (MOU).

1) BMP # 1: BTV will work with the regional group to develop a website dedicated to public education as it relates to water quality issues. In the event that the regional group is not able to develop a website, BTV will make modifications to their existing site to accommodate a water quality section for the purpose of public education.

Status: Implemented. The water quality website, www.smartwaterways.org, has been developed and is online.

BTV has also provided an environmental page on the airport website, http://www.burlingtonintlairport.com/aboutus/environment/, with links to the regional water quality website and the City of Burlington stormwater management website.

Timeframe: Not applicable.

Measurable Goals: Not applicable.

Person(s) Responsible for BMP: The Burlington International Airport's public education and outreach program is overseen by the Airport Engineer, who is responsible for the overall coordination of the storm water management program at the airport.

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

B. Public Participation/Involvement

This measure has been met by BTV implementing a program which will involve coordinating or participating in three (3) separate activities (BMPs) that encourage public participation and involvement. Following are descriptions, timeframes, measurable goals, and status of the three BMPs:

1) BMP # 1: BTV will establish designated Advertisement Space in the Airport Terminal for public participation and involvement purposes.

Status: Implemented. BTV has designated advertisement space in the terminal for public participation and involvement. In addition, a banner displaying the regional group's web address has been hung in the baggage claim area.

Timeframe: BTV will review and update (if necessary) the content of the advertisement by December 31st of each year.

Measurable Goals: 1) BTV will review, re-evaluate, and update (if necessary) the display once per year.

Person(s) Responsible for BMP: The Burlington International Airport's public participation and involvement program and each of the three BMPs will be implemented and coordinated by the Airport Operations Division, and overseen by the Airport Engineer, who is responsible for the overall coordination of the storm water management program at the airport.

Rationale for Selection: With over 1,000,000 people passing through the terminal area annually, this will prove to be a valuable tool to reach the public.

2) BMP # 2: BTV will institute a storm drain tagging program, which will help to inform and remind the public that storm water runoff will reach waters of the state. Stencils will be placed on all publicly viewed storm drains. This will not include storm drains located on the air carrier ramp, due to marking restrictions.

Status: Implemented. A storm drain tagging program has been developed, and is ongoing. Tags have been placed on all publicly viewed storm drains. The tags are inspected and replaced as necessary each year.

Timeframe: Ongoing. BTV will inspect storm drain tags and re-tag storm drains as necessary by April 30th of each year.

Measurable Goals: 1) BTV will re-tag each applicable storm drain as necessary once every year.

Person(s) Responsible for BMP: The Burlington International Airport's public participation and involvement program and each of the three BMPs will be implemented and coordinated by the Airport Operations Division, and overseen by the Airport Engineer, who is responsible for the overall coordination of the storm water management program at the airport.

Rationale for Selection: With over 1,000,000 people passing through the terminal area annually, this will prove to be a valuable tool to reach the public.

3) BMP # 3: BTV will provide a designated display rack. Located in the terminal concourse area and readily visible to the public, the display rack will provide a location for entities other than BTV to display literature and information on storm water pollution prevention and water quality. Entities that could use the space include other traditional and non-traditional MS4s, the State of Vermont, the Lake Champlain Committee, Friends of the Winooski River, etc.

Status: Implemented. BTV has provided a designated display rack adjacent to the designated advertisement space mentioned in BMP #1.

Timeframe: BTV will review and update (if necessary) the information contained in the display rack by December 31st of each year.

Measurable Goals: 1) BTV will display literature and information on stormwater pollution prevention and quality in the rack each year.

Person(s) Responsible for BMP: The Burlington International Airport's public participation and involvement program and each of the three BMPs will be implemented and coordinated by the Airport Operations Division, and overseen by the Airport Engineer, who is responsible for the overall coordination of the storm water management program at the airport.

Rationale for Selection: With over 1,000,000 people passing through the terminal area annually, this will prove to be a valuable tool to reach the public. Because of the size of the terminal concourse area, this BMP provides the potential to reach many more people than allowed by other methods of public participation and involvement.

Each of the three BMPs mentioned above will be re-evaluated annually to monitor their effectiveness and ensure they are concurrent with the goals of ANR and BTV. If an activity becomes ineffective or undesirable, as agreed upon by ANR and BTV, then a replacement activity will be discussed, agreed upon, and initiated.

Because the airport is a department of the City of Burlington, the airport may additionally participate in City sponsored programs for clean up/green up days or other activities supported by the Mayor of the City of Burlington and Director of Aviation at the Burlington International Airport.

C. Illicit Discharge Detection and Elimination

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 include developing, implementing and enforcing a plan to detect and eliminate all illicit discharges.

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

- A comprehensive storm sewer system Geographic Information Systems (GIS) map of the airport, showing locations of all outfalls and names and locations of receiving waters.
- A policy which effectively prohibits non-storm water discharges into the BTV storm sewer system and implementing appropriate enforcement procedures and actions. This policy will be directed towards BTV employees and tenants.
- A plan to detect and address non-storm water discharges (including illegal dumping) to the BTV storm system. Outfall monitoring priorities will be established, and monitoring activities based on handling of certain materials (deicing material, cleaning fluids, fuel, etc.) will be completed. Monitoring results will be incorporated into the plan and problem discharges will be eliminated or corrected.
- An annual monitoring schedule will be established with monitoring efforts consisting of annual visual and smell tests at all outfalls and discharge points, and is ongoing.
- A way to inform employees and tenants of hazards associated with illegal discharges and improper disposal of waste. The airport will begin working with John Daly of the ANR Compliance Assistance Division. John worked with airport staff and tenants to look at their maintenance and business practices and determine if they need to make changes to ensure environmental compliance.

Status: Completed. A summary of monitoring activities conducted and corrective actions taken are summarized in SWMP, Volume 1 - Section 4. The airport completed a stormwater study in December 2004 which included an analytical monitoring program. This study is included as Volume 3 of the SWMP. The monitoring program had the following objectives:

- **Identify stormwater outfalls with high concentrations of pollutants. Pollutants identified under current monitoring include volatile organic compounds, glycols, TPH, surfactants, metals, e. coli, BOD5, COD, chloride, conductivity, DO, nitrogen, TKN, pH, phosphorous, turbidity and TSS.**
- **Quantify flow from selected outfalls**

- **Determine if BTV is a "significant contributor" to existing water quality impacts to impaired waters**
- **Identify illicit discharges**
- **Collect data to aid in the development of an action plan to address and remediate areas where existing water quality impacts or illicit discharges are identified**

Since the study was completed, all illicit discharges have been eliminated as summarized in SWMP, Volume 1 - Section 4.

As part of the study, a comprehensive base map of the entire BTV property was developed. The map was originally developed in 1997 by Donald L. Hamlin Consulting Engineers, and was reviewed and updated in 2004 and 2007 to reflect new BTV development. The 1997 study included field investigation evaluation reports, identification of drainage areas, and pipe capacity calculations, as well as cleaning of some systems. The newly updated base map serves as a master plan of all structures, pipes, outfalls and receiving waters. The updated base map is contained in SWMP, Volume 1 – Appendix D.

A policy for prohibiting non-storm water discharges, and references to outfall monitoring schedule and staff and tenant training are contained in SWMP, Volume 1 – Section 4.

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

> **1) BTV will continue ongoing monitoring efforts and will complete the ongoing stormwater study, including monitoring and base map development by June 2004.**
>
> **Status: Completed. The stormwater study was completed in December 2004. Initial compliance monitoring and base plan development was included as part of this study. This study is included as Volume 3 of the SWMP.**
>
> **2) BTV will develop a draft of the SWMP and submit to ANR for review by June 2005.**
>
> **Status: Completed. The draft SWMP plan has been completed, and is being submitted with the NOI.**
>
> **3) Most or all illicit discharges detected by the stormwater study will be eliminated by June 2006.**
>
> **Status: Completed. All illicit discharges have been eliminated. See SWMP, Volume 1 - Section 4.**
>
> **4) BTV will implement the SWMP by June 2007.**

Status: The SWMP will be implemented by June 2008.

5) BTV will provide the Secretary of ANR with a summary of monitoring activities conducted and corrective actions taken by February 1, 2008.

Status: Completed. A summary of monitoring activities conducted and corrective actions taken are summarized in SWMP, Volume 1 - Section 4.

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

Measurable Goals: 1) BTV will review and update the SWMP each year.

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

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

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 Airport Engineer, 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 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: Ongoing.

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: 1) BTV will distribute 500 questionnaires to employees and tenants by June 2008.

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 Airport Engineer, 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.

D. Construction Site Runoff Control

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 include developing, implementing and enforcing a plan to prevent or reduce pollutants in construction site runoff.

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. This plan will include the following:

- Measures for the adoption of an erosion control policy for storm water runoff from all construction sites
- Procedures to identify construction activities meeting the one (1) acre and five (5) acre thresholds and report such activities to the Secretary to assure that all such projects are properly permitted in accordance with the ANR General Permit for Stormwater Runoff from Construction Sites (CGP)
- Procedures to assure that construction activities are properly permitted and erosion and sediment control measures during construction are implemented in accordance with the terms of the permit
- Procedures to assure that permitted projects are properly constructed and operated and maintained in accordance with the terms of the permit
- Procedures to assist the Secretary of ANR in inspecting permitted projects for obvious signs of non-compliance with the conditions of the permit
- Procedures for proper disposal of removed waste
- For a listing of additional items to be included in the SWMP, refer to Section VI of this narrative

Status: Completed. The Construction Site Runoff Control Plan in 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: 1) BTV will review and update the SWMP each year.

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 Airport Engineer, 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.

E. Post-Construction Runoff Control

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 include developing, implementing and enforcing a plan to prevent or reduce pollutants in runoff from post-construction sites.

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. This plan will include the following:

- An operation and maintenance program for preventing or reducing pollutant runoff from operations including the maintenance of buildings, open spaces and storm water systems
- Procedures to ensure compliance with the ANR Stormwater Rule and to identify projects that disturb greater than one (1) acre and report to the Secretary of ANR such activities that have one (1) or more acres of impervious surface to assure that all such projects are properly permitted
- Procedures to prevent or minimize water quality impacts from storm water runoff from projects that disturb greater than one (1) acre and have less than one (1) acre of impervious surface by utilizing a combination of structural and non-structural BMPs consistent with the Agency's 2002 Vermont State Stormwater Management Manual
- Procedures to assure that permitted projects are properly constructed and operated and maintained in accordance with the terms of the permit
- Procedures to assist the Secretary of ANR in inspecting permitted projects for obvious signs of non-compliance with the conditions of the permit
- Maintenance schedules and inspection procedures for long term structural BMPs
- Procedures for proper disposal of removed waste
- A comprehensive storm sewer system Geographic Information Systems (GIS) map of the airport showing locations of all outfalls and names and locations of receiving waters
- For a listing of additional items to be included in the SWMP, refer to Section VI of this narrative

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) BTV will review and update the SWMP each year.

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 Heather Kendrew, 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.

F. Pollution Prevention/Good Housekeeping

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 include developing, implementing and enforcing a plan to ensure pollution prevention and 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 is also meets the requirements of the SWPPP as outlined in the MSGP. The SWMP will include the following:

- An operation and maintenance program for preventing or reducing pollutant runoff from operations including the maintenance of buildings, open spaces and storm water systems
- Maintenance schedules and inspection procedures for long term structural BMPs
- Controls for reducing or eliminating the discharge of pollutants from roads, runways, buildings, parking lots, storage areas and maintenance shops
- Procedures for proper disposal of removed waste
- A training component
- A comprehensive storm sewer system Geographic Information Systems (GIS) map of the airport showing locations of all outfalls and names and locations of receiving waters
- For a listing of additional items to be included in the SWMP, refer to Section VI of this narrative

Status: Completed. The Burlington International Airport is a non-traditional MS4. Since they are an airport, coverage under the NPDES Phase II Multi Sector General Permit (MSGP) was obtained. 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.

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

Measurable Goals: 1) BTV will review and update the SWMP and SWPPP each year.

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 Heather Kendrew, 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.

III. 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 Watershed Improvement Permits (WIPs) issued for those waters. BTV has discharges to one such water body: Potash Brook (4 outfalls).

Potash Brook is principally impaired due to collected stormwater runoff. Pollutants of concern include sediment, pathogens, toxics, organic enrichment and temperature. As of the date of submittal of this MS4 NOI, no Watershed Improvement Permit has been issued by ANR for Potash Brook. Upon issuance, BTV will comply with all applicable requirements.

IV. 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 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 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; 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 it is composed 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. These buffers are controlled by the municipal zoning committee, and thus the development of new restrictions is not applicable to BTV. However, BTV will comply with any such duly adopted municipal zoning requirements.

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 are controlled by the municipality, and thus the development of new regulations or alteration of existing regulations is not applicable to BTV. However, BTV will comply with any such duly adopted municipal regulations. In addition, it should be noted that a majority of the BTV site is currently conveyed via overland flow and grassed channels, and is infiltrated. 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.

The Potash Brook TMDL was issued on December 19, 2006. BTV will comply with all applicable requirements of the TMDL.

V. 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, which is the drinking water watershed for the Champlain Water District (CWD). To meet the requirements of Section 4.1.4, BTV has included and copied CWD on this MS4 NOI. In addition, BTV will notify CWD of future projects that discharge to Potash Brook and any future problems with existing outfalls that discharge to Potash Brook.

VI. 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. Also included in the SWMP will be the following:

- An operation and maintenance program for preventing or reducing pollutant runoff from operations including the maintenance of buildings, open spaces and storm water systems
- Procedures to identify projects that disturb greater than one (1) acre and report to the Secretary such activities that have one (1) or more acres of impervious surface to assure that all such projects are properly permitted
- Procedures to prevent or minimize water quality impacts from storm water runoff from projects that disturb greater than one (1) acre and have less than one (1) acre of impervious surface by utilizing a combination of structural and non-structural BMPs consistent with the Agency's 2002 Vermont State Stormwater Management Manual
- Procedures to assure that permitted projects are properly constructed and operated and maintained in accordance with the terms of the permit
- Measures for the adoption of an erosion control policy for storm water runoff from construction sites
- Procedures to identify construction activities meeting the one (1) acre and five (5) acre thresholds and report such activities to the Secretary to assure that all such projects are properly permitted in accordance with the ANR General Permit for Stormwater Runoff from Construction Sites (CGP)
- Procedures to assure that construction activities are properly permitted and erosion and sediment control measures during construction are implemented in accordance with the terms of the permit
- Procedures to assist the Secretary of ANR in inspecting permitted projects for obvious signs of non-compliance with the conditions of the permit
- Maintenance schedules and inspection procedures for long term structural BMPs
- Controls for reducing or eliminating the discharge of pollutants from roads, runways, buildings, parking lots, storage areas and maintenance shops
- Procedures for proper disposal of removed waste

- A training component
- A comprehensive storm sewer system Geographic Information Systems (GIS) map of the airport showing locations of all outfalls and names and locations of receiving waters

BTV has developed a SWMP to meet these requirements, and will review and update the plan as necessary annually.

VII. Statement of Intent

It is the objective of the Burlington International Airport as a designated MS4 to comply with the conditions specified under ANR General Permit 3-9014 (NPDES Number VTR040000). It is the intent of the Airport to develop, design, implement and enforce the plans, procedures, programs and measures outlined in this narrative.

3/18/08

Heather Kendrew Date
Stormwater Management Program Manager
Burlington International Airport

3/18/08

Brian Searles Date
Director of Aviation
Burlington International Airport