



U.S. Department
of Transportation
**Federal Aviation
Administration**

Memorandum

Subject: Program Guidance Letter 91-4

Date: 29 MAR 1991

From: Manager, Grants-in-Aid Division, APP-500

Reply to
Attn. of:

To: PGL Distribution List

91-4.1 Airport Permit Applications for Storm Water Discharges -
Mark Beisse (267-8826).

A final rule was issued by the Environmental Protection Agency (EPA) in November regarding permits required for storm water discharges to waters of the United States. The regulation sets forth new National Pollutant Discharge Elimination System (NPDES) permit application requirements for: 1) construction project sites which include clearing, grading and excavation activities of five acres or more on an airport, and 2) portions of airports which involve fueling, deicing or similar operations. Due to the complexity of the regulation and the short permit application deadlines, airport sponsors may request assistance to prepare storm water studies as a part of AIP projects.

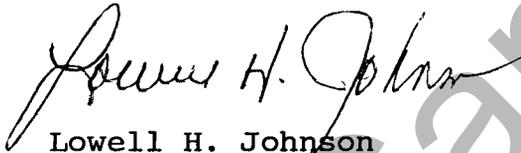
For construction project permits, work directly needed for a required NPDES permit application is eligible as a project formulation cost. This includes description of the construction site, excavation activities, proposed measures to control pollutants during and after construction, forecast runoff increases, fill materials, and the anticipated impacts on the quality of storm water discharges. Airport sponsors may qualify for "general" permits authorizing a category of discharges within a geographic area, or a permit issued on behalf of "group" applicants which have similar characteristics. Sampling data on the airport groups or general categories for general and group permits is eligible. Airport sponsors that seek AIP assistance should be advised to check the general and group permit options, although "individual" permit applications are also eligible. The cost of work on permits should be relatively low since EPA has estimated the costs for data collection and preparing initial individual permit applications to average as little as \$1007.

For instances when sponsors request planning assistance to support the second type of required permits, the airport

operations, most activities involve management or operational functions rather than eligible airport development. Consequently, eligible planning work in preparing the NPDES permit application for such airport operations is limited to inventorying the number and location of outfalls and preparing site drainage maps. This includes descriptions of topography, the airport drainage system, existing water treatment facilities, and current plans for these facilities. Ineligible planning work includes identification of improvements already required by an earlier NPDES permit, describing pollutant sources, certifications about discharges, water quality studies, monitoring services, and providing information about leaks, spills, or discharges.

Mitigating measures and facility improvements required by the new permits for the airport operations will not be known until the permit is issued under the EPA regulation. Therefore, determinations on the eligibility of planning work for hydraulic modeling, pollution control, storm water facility plans, estimating costs, project scheduling, and environmental assessment for storm water facilities, may be premature at this time.

Special care should be taken to avoid making statements about eligibility of storm water treatment facilities since the nature and cost of EPA permit requirements are not known at this time. Please notify APP-510 of problems you encounter with the eligibility of work related to the storm water discharge permit applications and treatment facilities.


Lowell H. Johnson