2021 MULTI-SECTOR GENERAL PERMIT

STORMWATER POLLUTION PREVENTION PLAN

AERSALE, INC.
ROSWELL, NEW MEXICO FACILITY

Prepared for

Randy Phelps
General Manager

AerSale, Inc.
Roswell, New Mexico Facility
703 East Challenger Street
Roswell, NM 88203

By

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President

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I. FACILITY DESCRIPTION AND CONTACT INFORMATION

I.A FACILITY INFORMATION

Facility Information
Name of Facility: AerSale, Inc., Roswell, New Mexico Facility [AerSale]
Street: 703 E. Challenger St.
City: Roswell State: NM Zip Code: 88203
County: Chaves
NPDES ID: NMR05J01V
Primary Industrial Activity SIC code, and Sector and Subsector:
SIC Codes 4581, Sector S, Subsector S1
Co-located Industrial Activity(s) SIC code(s), Sector(s), and Subsector(s)
SIC Code 5015, Sector M, Subsector M1

Latitude/Longitude
Latitude: 33.3124°N Longitude: 104.5128°W
Determined by USGS topographic map (Scale 1:24,000)
Horizontal Reference Datum: NAD 83

Facility is not located in Indian territory.

AerSale is not considered a "federal operator" of the facility.

Estimated area of industrial activity at site exposed to stormwater: 23 acres

Discharge Information
This facility discharges stormwater to Outfall 001via storm drains into a municipal separate stormwater system that is not an MS4.

The surface waters that receive stormwater from this facility are the Hagerman Canal and from the Hagerman Canal to the Pecos River.

This facility discharges industrial stormwater into a segment of an "impaired water." The impaired water is a segment of the Pecos River the impairment of which is temperature.

This facility discharges industrial stormwater into a segment of the Pecos River designated as Tier 1 for temperature and Tier 2 for all other pollutants. This Pecos River segment is not designated as a Tier 3 water.

Numbers in brackets ([]) identify locations in the MSGP of the requirement discussed herein.

I.B RESPONSIBILITIES/CONTACT INFORMATION/SIGN POSTED

1. Responsibilities

AerSale is a tenant of the Roswell Air Center (RAC) but has its own SWPPP (this one) and will carry out its own inspections, sampling, reporting, and other requirements of this SWPPP.

2. Contact Information

Facility Operator
Name: AerSale, Inc., Roswell, NM Facility, Randy Phelps, General Manager
Address: 703 E. Challenger St.
City, State, Zip Code: Roswell, NM 88203
Telephone Number: 575-624-3140 Ext. 3316
Email address: randy.phelps@aersale.com
Fax number: 575- 347-9846

Facility Owner
Name: City of Roswell, New Mexico, Chad Cole, City Manager
Address: 425 North Richardson
City, State, Zip Code: Roswell, NM 88201
Telephone Number: 575-637-6269
Email address: c.cole@roswell-nm.gov

SWPPP Contacts
SWPPP Contact Name (Primary): Randy Phelps
Telephone Number: 575-624-3140 Ext. 3316
Email address: randy.phelps@aersale.com
Fax number: 575- 347-9846

SWPPP Contact Name (Backup): Jordan Creel
Telephone Number: 575- 624-3140 Ext. 3322
Email address: jordan.creel@aersale.com
Fax number: 575-347-9846

3. Sign Posted **[1.3.5]**

AerSale will post a sign of its permit coverage at a safe, publicly accessible location near AerSale. AerSale will use a font large enough to be readily viewed from a public right-of-way and perform periodic maintenance of the sign to ensure that it remains legible, visible, and factually correct. The sign will contain the following information.

a. The statement "AerSale, Inc., Roswell, NM Facility is permitted for industrial stormwater discharges under the U.S. EPA's Multi-Sector General Permit (MSGP)"

b. The statement: "NPDES ID: NMR05J01V"

c. A contact phone number for obtaining additional facility information; and

d. The statement "To obtain the Stormwater Pollution Prevention Plan (SWPPP) for this facility or to report observed indicators of stormwater pollution, contact: Jordan Creel at (575) 624-3140, Ext 3322 and EPA at (214) 665-7522"

4. Rain Gauge

AerSale will install a rain gauge as close as practicable to Outfall 001 and maintain a rainfall log to document rainfall amounts required in Routine and Visual quarterly inspections.

I.C. SWPPP CONTENTS [6.2], CERTIFICATION [8.S.3.3], AND PREPARER [6.1]

1. SWPPP Contents

This SWPPP contains all the following elements: Stormwater Pollution Prevention Team; site description; summary of potential pollutant sources; description of control measures; schedules and procedures; documentation to support eligibility considerations under other federal laws [5.2.6]; and signature requirements described below.

2. Certification

This SWPPP is certified by the General Manager of the AerSale Roswell facility. Since AerSale, Inc. is a corporation, the General Manager is authorized by the president, secretary, or treasurer of the corporation to (1) make management decisions which govern the operations of the AerSale Roswell facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; (2) ensure that necessary systems are established or actions taken to gather complete and accurate information for permit requirements; and (3) sign documents on behalf of the corporation. [Appendix B, Subsection 11.A.1]

Attachment A of this SWPPP contains this certification.

All certifications required by this SWPPP will read as follows:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." [Appendix B, Subsection 11.E]

3. Preparer

This SWPPP has been prepared per good engineering practices and to industry standards by Mary F. Barron, of Barron's Environmental Solutions – In Time!, Inc. Ms. Barron is a "qualified person" – a person knowledgeable in the principles and practices of industrial stormwater controls and pollution prevention and possesses the education and ability to assess the effectiveness of stormwater controls selected and installed to meet the requirements of the MSGP.

I.D. STORMWATER POLLUTION PREVENTION TEAM [6.2.1]

1. Responsibilities

The stormwater pollution prevention team is responsible for overseeing development of the SWPPP, any modifications to it, and for implementing and maintaining control measures and taking corrective actions when required.

2. Members of the Stormwater Pollution Prevention Team

- General Manager - Oversees development of SWPPP and SWPPP modifications
- Director of Quality - Oversees implementation of the SWPPP
- Quality Assurance Manager – Oversees implementation of the SWPPP
- Director of Maintenance – Oversees implementation of the SWPPP

- Maintenance Manager – Oversees all maintenance activities

I.E. SITE DESCRIPTION [6.2.2.]

1. Activities at the Facility [6.2.2.1]

AerSale's operations include aircraft maintenance, repair, and storage; removing useable parts from aircraft; providing aircraft parts' storage and ground equipment service support; maintenance of ground vehicles; fueling of both aircraft and ground vehicles; de-fueling of aircraft; equipment and materials' storage; and painting.

2. Run-On From Third-Party Entities Located Among and Adjacent to AerSale Facilities

AerSale's facilities are not contiguous. As Figure 2, Site Map, shows, there is Part 1 comprising the areas of Buildings 240 and 92; Part 2 comprising the areas of Buildings 115, 118, 85, and the Paint Booth. The areas of CAVU Aerospace (CAVU), and the Bureau of Land Management (BLM), are located adjacent to Building 85's area on the south and east, respectively; and Part 3 comprising the areas of Buildings 66, and 58, with the Roswell Air Center's area located adjacent to this whole area on the north. Building 91, CAVU, the Roswell Air Center (RAC), and BLM have potential pollutant sources, the discharge of which could run onto the AerSale facilities on the north, south, and west. In addition, water from CAVU's, RAC's and Building 91's storm drains will commingle with water from AerSale's storm drains.

When a run-on from Building 91, CAVU, BLM, and/or RAC to AerSale's facilities causes an exceedance, in addition to reviewing and revising, as appropriate, this SWPPP, AerSale will notify the respective managers of these entities to abate its (their) pollutant contribution. AerSale will contact both the RAC Airport Director and USEPA Region 6 if the respective managers fail to take action to address the stormwater run-on. [4.2]

3. General Location Map **[6.2.2.2]**

AerSale comprises approximately 30.4 acres located in Section 33, Township 11 South, Range 24 East in Chaves County, New Mexico. Approximately 29.4 acres are impervious, and 1.7 acres are pervious.

Figure 1, Location Map, shows the location of the facility; the first receiving water for stormwater discharges, the Hagerman Canal; and the distance in the stormwater flow direction from AerSale's Outfall 001 to the Hagerman Canal, about 7.45 miles. The Hagerman Canal can be discharged to the Pecos River, which is the ultimate receiving water body. The Pecos River, in the section to which the Hagerman Canal discharges, is impaired, and the cause of the impairment is temperature.

4. Site Map **[6.2.2.3, 8.S.5.1]**

Figure 2, Site Map, shows the following areas of AerSale.

- property boundaries and size in acres;
- location and extent of significant structures and impervious surfaces;
- stormwater flow direction;
- locations of stormwater control measures;
- locations of all receiving waters;
- locations of all stormwater conveyances including ditches, pipes, and swales;
- locations of potential pollutant sources;

- locations where significant leaks or spills have occurred;
- locations of all stormwater monitoring points;
- locations of storm drains and Outfall 001;
- fueling stations;
- aircraft, ground vehicle, and equipment maintenance/cleaning areas;
- loading/unloading areas;
- waste storage areas;
- liquid storage tanks;
- processing and storage areas;
- immediate access roads used or traveled by carriers of raw materials, manufactured products, waste material;
- transfer areas for substances in bulk;
- machinery; and
- storage areas for aircraft, ground vehicles, and equipment awaiting maintenance.

II. POTENTIAL POLLUTANT SOURCES

II.A. SUMMARY OF INDUSTRIAL ACTIVITIES WHICH ARE POTENTIAL POLLUTANT SOURCES [8.S.5.2] [6.2.3]

Activities in the area **[6.2.3.1]** are:

1. Aircraft and Vehicle Fueling and Aircraft De-fueling
2. Ground Vehicle and Equipment Maintenance
3. Aircraft Fluids' and Reusable Parts' Removal
4. To Be Determined
5. Fuel Storage
6. Loading Waste Materials for Transport/Unloading Fresh Materials for Use
7. Aircraft Maintenance and Repair
8. Aircraft Parking
9. Waste Materials' Storage
10. Non-fuel Unused Materials' Storage
11. Ground Vehicle Cleaning
12. Employee/vendor Parking Within AerSale's Operations' Areas
13. Equipment Storage
14. Collecting Snowmelt from Contaminated Snow
15. AerSale does not conduct deicing.
16. To Be Determined
17. Aircraft, Ground Vehicle, and Equipment Awaiting Maintenance
18. Painting
19. AerSale-Wide Activities: Floatable Debris, Dumpsters, Storm Drains

II.B. POTENTIAL POLLUTANTS AND CONTROL MEASURES ASSOCIATED WITH EACH INDUSTRIAL ACTIVITY [8.S.5.2] [6.2.3.2]

Pollutants that could be exposed to rainfall or snowmelt are associated with the following activities and their areas. These same materials were present in 2020, 2019, and 2018.

Attachment B, Control Measures Chart, lists these activities as "Potential Pollutant Sources (PPS)" and provides the numbered Control Measure(s) (CM) to be applied to each activity. Figure 2, Site Map, shows the Control Measure(s), by circled number, in each area where they apply.

1. Aircraft and Vehicle Fueling and Aircraft De-fueling

Potential pollutants are Jet A aviation fuel, diesel fuel, and unleaded gasoline. Spills or leaks could occur.

Control measures are: Fueling operations (including the transfer of fuel from tank trucks) will be conducted on an impervious pad; drip pans will be used where leaks or spills of fuel can occur and where making or breaking hose connections; mobile spill response carts (spill kits) or absorbent materials will be kept near potential spill areas; and any spills will be cleaned up immediately using dry cleanup methods.

2. Ground Vehicle and Equipment Maintenance

Potential pollutants are unleaded gasoline, diesel, engine oil, brake fluid, power steering fluid, transmission fluid, degreasers, and antifreeze. Spills or leaks could occur.

Control measures are: Ground vehicle and equipment maintenance will be performed both indoors, inside a totally enclosed building, and outdoors. Maintenance performed indoors is done in Building 66. Floor drains present in this building will either drain to City of Roswell sewer system or the drains will be protected from inflow. For maintenance performed outdoors, drip pans will be used where leaks or spills of fuel can occur and where making or breaking hose connections; spill kits or absorbent materials will be kept near potential spill areas; any spills will be cleaned up immediately using dry cleanup methods. If a nearby storm drain is present to which ***all*** stormwater runoff from the maintenance area would drain, an industrial stormwater wattle will be placed around the storm drain and replaced as necessary. If such a storm drain ***is not*** present, an industrial stormwater wattle will be placed around each aircraft undergoing maintenance and replaced as necessary.

3. Aircraft Fluids' and Reusable Parts' Removal

Potential pollutants are engine oil, aviation hydraulic fluid, other oils, and Jet A aviation fuel. Spills or leaks could occur.

Control measures are: Reusable parts of the aircraft will be parted out and packaged for resale; all fluids will be drained from the aircraft, placed in covered, good-condition, properly labeled containers, and stored in Waste Material areas or in fuel recycling areas for resale; absorbent materials will be used under exposed engines; drip pans will be used where leaks or spills of fuel can occur and where making or breaking hose connections; spill kits or absorbent materials will be kept on-site in near potential spill areas; and any spills will be cleaned up immediately using dry cleanup methods. If a nearby storm drain is present to which ***all*** stormwater runoff from the maintenance area would drain, an industrial stormwater wattle will be placed around the storm drain and replaced as necessary. If such a storm drain ***is not*** present, an industrial stormwater wattle will be placed around each aircraft undergoing maintenance and replaced as necessary. After fluids' removal, reusable parts of the aircraft will be parted out and packaged for resale.

4. To be determined.

5. Fuel Storage

Potential pollutants are Jet A aviation fuel, diesel fuel, and unleaded gasoline. Spills or leaks could occur.

Control measures are: Fuels will be stored in the Fueling Area on an impervious surface with secondary containment. If fuels are stored indoors, there will be no floor drains, protected floor drains, or drains to the City of Roswell sewer. Spill kits or absorbent materials will be kept near the storage areas. Spills or leaks will be cleaned up immediately using dry cleanup methods. All containers will be in good condition and will be clearly and accurately labeled.

6. Loading Used Materials for Transport and Unloading New Materials for Use

Used materials: Potential pollutants are waste oil; waste fuels; waste soaps; waste degreasers; waste antifreeze; waste aviation hydraulic fluid; waste brake, transmission, and power steering fluids; waste batteries; waste paint and waste materials used in painting.

New materials: Potential pollutants are Jet A aviation fuel; unleaded gasoline; diesel; engine oil; brake fluid; power steering fluid; transmission fluid; antifreeze; soaps; degreasers; paint and materials used in painting; and unused batteries. Spills or leaks could occur.

Control measures are: Spill kits or absorbent materials will be kept near potential spill areas; and any spills will be cleaned up immediately using dry cleanup methods.

7. Aircraft Maintenance

Potential pollutants are engine oil, degreasers, other oils, and aviation hydraulic fluid. Spills or leaks could occur.

Control measures are: Aircraft maintenance will be performed both indoors and outdoors. Maintenance performed indoors will be done in Building 85. Floor drains in this building will either drain to City of Roswell sewer system or the drains will be protected from inflow. For maintenance performed outdoors, drip pans will be used where leaks or spills of fuel can occur and where making or breaking hose connections; spill kits or absorbent materials will be kept near potential spill areas; and any spills will be cleaned up immediately using dry cleanup methods. If a nearby storm drain is present to which ***all*** stormwater runoff from the maintenance area would drain, an industrial stormwater wattle will be placed around the storm drain and replaced as necessary. If such a storm drain ***is not*** present, an industrial stormwater wattle will be placed around each aircraft undergoing maintenance and replaced as necessary.

8. Aircraft Parking

Potential pollutants are Jet A aviation fuel, engine oil, aviation hydraulic fluid, and other oils. Spills or leaks could occur.

Control measures are: Spill kits or absorbent materials will be kept near potential spill areas. Absorbent materials will be kept under parked aircraft engines, and any spills or leaks will be cleaned up immediately using dry cleanup methods.

9. Waste Materials' Storage

Potential pollutants are waste oil; waste fuels; waste degreasers; waste aviation hydraulic fluid; waste soaps; waste brake, transmission, and power steering fluids; used batteries; and waste paint and waste materials associated with painting. Spills or leaks could occur.

Control measures are: All materials except used batteries will be stored in the totally enclosed Hazardous Waste (Hazw) Shed. Used batteries will be stored in the totally enclosed Used Batteries Facility. Both facilities sit on an impervious surface and are protected from rainfall and snowfall. Spill kits or absorbent materials will be kept nearby, and any spills will be cleaned up immediately using dry cleanup methods. All containers will be in good condition and will be clearly and accurately labeled.

10. Non-fuel Unused Materials' Storage

Potential pollutants are paint, materials associated with painting, engine oil, brake fluid, power steering fluid, transmission fluid, antifreeze, aviation hydraulic fluid, degreasers, soaps, and unused batteries. Spills or leaks could occur.

Control measures are: Batteries will be stored in the Good Batteries Facility. Paint will be stored indoors in the Paint Booth building. Floor drains in this building will either drain to the City of Roswell sewer system or are protected from inflow. All other materials will be stored in the totally enclosed Good Chemicals Facility. All containers will be in good condition and clearly and accurately labeled. Absorbent materials will be kept nearby, and any spills or leaks from these containers will be cleaned up immediately using dry cleanup methods.

11. Ground Vehicle Cleaning **[8.S.5.3]**

Potential pollutants are oil, greases, soaps, degreasers, radiator and windshield cleaners.

Control measures are: AerSale will not generate wash water. Ground vehicle cleaning will be carried out indoors inside Building 66. AerSale will “dry wash” only and use no water. Floor drains in this building either drain to the City of Roswell sewer system or are protected from inflow. No spills or leaks could occur in these areas.

12. Employee/Vendor Parking Within AerSale’s Operations’ Areas

The parking areas across Challenger Street from Building 85, and those adjacent on the west to Building 85, are exempt from requirements in the MSGP permit. For those within AerSale’s operations’ areas, potential pollutants are engine oil, transmission fluid, power steering fluid, brake fluid, and antifreeze. Spills or leaks could occur.

Control measures are: Absorbent material will be kept near parking areas; and any spills or leaks will be cleaned up immediately using dry cleanup methods.

13. Equipment Storage

Potential pollutants are oils, transmission fluid, and fuel. Spills or leaks could occur.

Control measures are: Equipment will be either stored outside, covered on pallets, or enclosed in plastic, or inside enclosed buildings. If these buildings have floor drains, the drains either drain to the City of Roswell sewer system or are protected from inflow. All equipment stored outdoors will be drained of all fluids first. Any spills or leaks will be cleaned up immediately using dry cleanup methods.

14. Contaminated Snowmelt **[8.S.5.4]**

Potential pollutants are Jet A aviation fuel, unleaded gasoline, engine oil, brake fluid, power steering fluid, transmission fluid, antifreeze, and diesel. Spills or leaks could occur.

Control Measures are: Melt water from contaminated snow will be collected immediately by absorbent materials or other means and will be stored in closed, labeled containers in the Hazw Shed.

15. AerSale does not conduct deicing.

16. To Be Determined.

17. Aircraft, Ground Vehicle, and Equipment Awaiting Maintenance

Potential pollutants are Jet A aviation fuel, unleaded gasoline, diesel, engine oil, aviation hydraulic fluid, brake fluid, power steering fluid, transmission fluid, and antifreeze. Spills or leaks could occur.

Control measures are: All aircraft, ground vehicle, and equipment awaiting maintenance will be stored in designated areas only. These designated areas will be either inside totally enclosed buildings or outdoors. If the buildings have floor drains, the drains either drain to the City of Roswell sewer system or are protected from inflow. If the storage is outdoors, absorbent materials will be kept under engines. Spill kits or absorbent materials will be kept nearby, and drip pans and/or absorbent materials will be used to collect leaks. Any spills will be cleaned up immediately using dry methods.

18. Painting

Potential pollutants are paint and materials associated with painting.

Control measures are: Painting will be carried out inside the Paint Booth Building just north of Building 85. There are no floor drains in the Paint Booth building. No spills or leaks could occur in this area.

19. AerSale-Wide Activities: Floatable Debris, Dumpsters, Storm Drains

Potential pollutants are garbage and floatable debris.

Control measures are: Floatable debris will be removed to dumpsters. AerSale will not allow any materials which have contacted oil, fuel, hydraulic fluid, hazardous materials, or other such materials to be placed in dumpsters, only domestic trash. Storm drains will be cleaned out every six (6) months.

II.C. SPILLS AND LEAKS [6.2.3.3]

Spills and leaks could occur in some of the areas noted above. During the last three years – 2020, 2019, and 2018 – no spills or leaks occurred.

II.D. UNAUTHORIZED NON-STORMWATER DISCHARGES [6.2.3.4]

By April 30, 2022, AerSale will inspect all onsite drainage points, looking for unauthorized non-stormwater discharges potentially reaching Outfall 001. The inspection document will include the date, evaluation criteria used, a list of the onsite drainage points directly observed. If AerSale finds any such unauthorized discharges, it will immediately act to eliminate the discharge and will document everything it did to immediately eliminate the unauthorized discharge. AerSale will keep this documentation in Attachment J, Corrective Action Reports.

Allowable non-stormwater discharges are:

1. Discharges from unplanned/emergency firefighting activities;
2. Fire hydrant flushings;
3. Potable water, including water line flushings;
4. Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors, and from the outside storage of refrigerated gases or liquids;
5. Landscape watering provided all pesticides, herbicides, and fertilizers have been applied per approved labeling;
6. Pavement wash waters where (a) no detergents or hazardous cleaning materials are used, and (b) the wash waters do not contact oil and grease deposits, potential pollutant sources listed in Part II.B, or any other toxic or hazardous materials, unless residues are first cleaned up using dry clean-up methods and appropriate control measures have been used to minimize discharges of mobilized solids and other pollutants;
7. Routine external building washdown/power wash water that does not use detergents or hazardous cleaning products;
8. Uncontaminated ground water; and
9. Foundation or footing drains where flows are not contaminated with process materials.

II.E. SAMPLING DATA [4.2., Table 4-1]

AerSale is in Primary Sector S and Primary Subsector S1 and has Co-located Primary Sector M and Co-Located Subsector M1. AerSale uses no urea or salt. Glycol is used as antifreeze in windshield washer fluid and radiators in ground vehicles and in employee and vendor vehicles. AerSale does no de-icing. The total amount of glycol used is significantly below the limit of 100,000 gallons per year. Therefore, AerSale is not subject to the effluent limitations in Parts 8.S.8 and 8.S.9 of the MSGP.

However, AerSale is required to do Indicator Monitoring, Benchmark Monitoring, and Impaired Waters Monitoring. The position responsible for sampling is that of the Quality Assurance Manager or his designee. The laboratory used is Hall Environmental Analysis in Albuquerque, New Mexico. **AerSale will make sure that samples reach the laboratory on a working week day.**

II.F. INDICATOR MONITORING [4.2.1.1.b, 8.S.7, Table 8.S-1]

AerSale will monitor Outfall 001for 16 polycyclic aromatic hydrocarbons (PAHs) four times during this MSG permit's term: twice between July 2021 and February 2022, and twice between April 2024 and March 2025.

1. Collection Procedures

AerSale will collect samples during the first 30 minutes of a storm event equal to or more than 0.1 inches of rainfall that causes a discharge from Outfall 001. If it is impossible to collect a sample within the first 30 minutes of rainfall, AerSale will document in the SWPPP and in the Annual Report why it was impossible.

2. PAHs to be Analyzed

The PAHs are: naphthalene, acenaphthylene, acenaphthene, fluorene, phenanthrene, anthracene, fluoranthene, pyrene, benzo[a]anthracene, chrysene, benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[a]pyrene, benzo[g,h,i]perylene, indeno[1,2,3-c,d]pyrene, and dibenz[a,h]anthracene.

Analytical Methods

AerSale will have the samples analyzed using EPA Method 625.1 or EPA Method 610/Standard Method 6440B, consistent with 40 CFR Part 136 analytical methods. AerSale will report the results of this monitoring to USEPA via NetDMR within 30 days after receiving the laboratory results.

Attachment D contains Indicator Monitoring laboratory results.

II.G. BENCHMARK MONITORING [4.2.2] AND IMPAIRED WATERS MONITORING (4.2.5.1)

AerSale will conduct benchmark and impaired waters monitoring for these parameters: For benchmark monitoring the parameters are Total Suspended Solids (TSS); and the metals aluminum (Al) and lead (Pb). For impaired waters monitoring the parameter is temperature. [8.M.6, Table 8.M-2]

1. Collection Procedure

AerSale will collect samples during the first 30 minutes of storm event equal to or more than 0.1 inches of rainfall that causes a discharge from Outfall 001. For snowmelt, AerSale will collect samples within the first 30 minutes that melting snow causes a discharge from the Outfall 001. If it is impossible to collect a sample within the first 30 minutes of rainfall or snowmelt, AerSale will document in the SWPPP and in the Annual Report why it was impossible.

2. Analytical Methods and Parameter Limits

Temperature will be measured by inserting a thermometer into the water, reading it, and then recording it in this SWPPP. The maximum limit for temperature is 90 degrees Fahrenheit. TSS will be analyzed per Standard Method SM2540D. The metals will be analyzed per 40 CFR Part 136 Appendix C method Inductively Coupled Plasma-Atomic Emission Spectrometry Method 200.7. [4.2.2.1] The maximum limit for TSS is 100 mg/l and for Al is 1,100 micrograms per liter (µg/l).

Lead is a hardness-dependent metal. Attachment C, NMED Surface Water Bureau Data on Hagerman Canal Water Hardness, shows that the receiving water, the Hagerman Canal where it flows into the Pecos River, is more than 1800 milligrams per liter (mg/l). Therefore, the maximum limit for lead is 262 µg/l [8.M.6, Table 8.M-2]

3. Impaired Water Monitoring Schedule

Analytical Methods and Parameter Limits AerSale will measure the temperature of the rain water collected each time it does benchmark monitoring. The temperature will be recorded in this SWPPP and reported to EPA in the Annual Report.

4. Benchmark Monitoring Schedule

AerSale will begin the monitoring during the first full quarter of MSGP coverage, July - September 2021, and continue for the following three quarters thereafter. AerSale will report the results of this monitoring to USEPA on an EPA Discharge Monitoring Report (DMR) form, via NetDMR, within 30 days after receiving the laboratory results. After having obtained and analyzed four samples, AerSale will calculate an annual average of the analytical results for each parameter. For averaging purposes, AerSale may use a value of zero for any individual parameter which is less than the method detection limit.[1] If the annual average of each parameter is at or below the maximum limit, AerSale will not collect samples again until the fourth year of MSGP coverage (April 2024 – March

[1] 2021 MSGP, Part 4.2.2.1

2025). If the average for any parameter is higher than the maximum limit, AerSale will continue monitoring for each quarter.

If stormwater discharge does not occur during any quarter AerSale will report this non-occurrence to USEPA on an EPA Discharge Monitoring Report (DMR) form, via NetDMR, and provide a modified schedule within 30 days after the end of the quarter in which no discharge occurs. **[4.2.2.4 and Part 7.8.6]**

AerSale will continue monitoring during each quarter, when possible, until it has collected four samples and then will calculate an annual average for each parameter. If the annual average of each parameter is at or below the maximum limit, AerSale will not collect samples again until the fourth year (April 2024 – March 2025) of MSGP coverage.

Regardless of annual parameter averages during the first three years of coverage, in the 4th year of permit coverage (April 2024 – March 2025), AerSale will again conduct benchmark monitoring as described above for each quarter, report to USEPA, and calculate an annual average as described above.

5. Additional Implementation Measures (AIM) if Benchmark Results Exceed Maximum Limits **[5.2.2.1, 5.2.2.2, 5.3.1]**

Additional measures kick in if a "Triggering Event" occurs. A "Triggering Event (TE)" is: the annual average exceeds the maximum limit for any parameter and/or the value of any parameter in any sampling event is equal to or greater than four (4) times that parameter's maximum limit.

AerSale will do two things if a TE occurs: (1) document the exceedance within 24 hours of becoming aware of it on a **signed and certified** Corrective Action Report (Attachment J) and include it in the Annual Report, and (2) follow sequential procedures called "additional implementation measures (AIM)."

The AIM procedures are divided into levels. Each AIM level has certain procedures and deadlines. Also, AerSale realizes that the AIM procedures are for each individual parameter for which the TE has occurred, so individual parameters causing a TE can be at different AIM levels.

Finally, AerSale will document in this SWPPP and in the Annual Report all TEs and all deviations from AIM deadlines.

a. AIM Level 1. **[5.2.3.1]**

Procedures. After receiving the laboratory results, AerSale will immediately review this SWPPP and the stormwater control measures (CMs) to see if the CMs are good as is or if changing any of the CMs might fix the exceedance problem. AerSale will do things like reviewing pollution sources, spill and leak procedures, and non-stormwater discharges; doing a single comprehensive clean-up; changing subcontractor(s), if any; implementing new CM; and/or increasing inspections.

Deadlines. If AerSale finds new or altered CM(s) that may correct the problem, AerSale will revise this SWPPP, and within 14 days after receiving the laboratory results implement the CM(s). If it can't meet the 14 days, it will document why not and implement the CM(s) within 45 days. If AerSale finds that its CMs are good as is, it will document that and explain why in the Annual Report.

Post AIM Level 1. AerSale will continue monitoring for the next four quarters. If no TE occurs during this monitoring, AerSale will have met the AIM Level 1 and will document that fact in the Annual Report.

b. AIM Level 2. **[5.2.4.1]**

Procedures. If during the next four quarters of monitoring, another TE occurs, AerSale will review this SWPPP and implement more rigorous CM(s) beyond what it did in AIM Level 1.

Deadlines. If AerSale finds new or altered CM(s) that may correct the problem, AerSale will revise the SWPPP, and within 14 days after receiving the laboratory results implement the CM(s). If it can't meet the 14 days, it will document why not and implement the CM(s) within 45 days. If AerSale finds that its CMs are still good as is, it will document that and explain why in the Annual Report.

Post AIM Level 2. AerSale will the continue monitoring for the next four quarters. If no TE occurs during this monitoring, AerSale will have met the AIM Level 2 and document that fact in the Annual Report.

c. AIM Level 3. **[5.2.5.1]**

Procedures. If during the next four quarters of monitoring another TE occurs, AerSale will review this SWPPP and install structural controls like permanent berms, cover, and/or secondary containment, and/or treatment controls like sand filters, infiltration structures and/or retention ponds. The controls that AerSale installs will have pollutant-removal efficiencies such that each exceeding parameter will be brought at or below its respective maximum limit.

Deadlines. AerSale will develop a written schedule for installing the structural and/or treatment controls within 14 days after determining what those controls will be and then install the controls with 60 days after that. If it can't make the 60 days it will document in this SWPP why not and install the controls within 90 days.

Post AIM Level 3. AerSale will the continue monitoring for the next four quarters. If no TE occurs during this monitoring, AerSale will have met the AIM Level 3 and document that fact in the Annual Report. However, if another TE occurs for the same parameter during the next four quarters, AerSale realizes that EPA may require AerSale to obtain an individual permit.

d. AIM Exception: Triggering Event Due to Run-on **[5.2.6.2]**

If at any point in AIM Levels 1, 2, or 3 AerSale believes that the TE has resulted from run-on from neighboring sources, AerSale will demonstrate and obtain EPA's agreement that this is case after doing the following.

- Notify each other contributing facility and request it abate its contributing pollution.

- If any other contributing facility fails to take action to address its contributing pollution, notify EPA via email or letter after making an initial telephone call. Current EPA contact information is: telephone number is (214) 665-7522; email Jahan.Nasim@epa.gov; mailing address

  EPA Region 6, Water Division
  1201 Elm St., Suite 500
  Dallas, TX 75270

- Submit to EPA AerSale's analysis and documentation for concurrence using the contact procedure above.

Attachment D contains Benchmark Monitoring laboratory results, Impaired Waters Monitoring temperature logs, and Discharge Monitoring Reports.

III. DESCRIPTION OF CONTROL MEASURES TO MEET TECHNOLOGY-BASED AND WATER QUALITY-BASED EFFLUENT LIMITS [6.2.4]

III.A NON-NUMERIC TECHNOLOGY-BASED EFFLUENT LIMITS (BAT [Best Available Technology]/BCT [Best Conventional Pollutant Control Technology] [2.1.2]

AerSale is subject to non-numeric technology-based effluent limits. To meet these limits, AerSale will use Best Conventional Pollutant Control Technology (BCT) and Best Available Technology (BAT) to minimize the exposure of processing and material storage areas to rain, snow, snowmelt, and runoff. AerSale will achieve BCT/BAT by implementing a combination of Best Management Practices (BMPs) which minimize exposure, practice good housekeeping, and conduct preventive maintenance.

1. Minimize Exposure

- Use grading, berming, curbing, or industrial storm wattles to prevent runoff of contaminated flows and divert run-on away from these areas;
- Locate materials, equipment, and activities either indoors or, if outdoors, cover them with storm-resistant covers, so that potential leaks and spills are contained or diverted before discharge;
- Clean up spills and leaks promptly using dry methods (e.g., absorbents);
- Store leaky vehicles and equipment indoors, or, if outdoors, use drip pans and absorbents;
- Use spill/overflow protection equipment;
- Perform all aircraft, vehicle, and/or equipment cleaning operations indoors;
- Perform all aircraft, vehicle, and/or equipment maintenance and repair operations indoors or, if outdoors, use industrial storm wattles around the maintenance and repair areas or around a nearby storm drain if the storm drain will catch *all* stormwater from the area, keep drip pans under leak or spill areas, keep spill kits or absorbent materials near potential spill areas, and clean up any spills immediately using dry cleanup methods;
- Drain fluids from aircraft, equipment and vehicles that will be decommissioned; and,
- Inspect at least monthly for leaks any equipment and vehicles that will remain unused for one or more months.

2. Practice Good Housekeeping

- Store materials in containers that are in good condition and clearly and accurately labeled;
- Store fuel tanks in secondary containment;
- Do not allow anything but dry domestic trash in dumpsters; and
- Minimize potential for waste, garbage, and floatable debris to be discharged by keeping exposed areas free of such materials.

3. Conduct Preventive Maintenance

- Inspect and perform preventive maintenance of stormwater drains; industrial storm wattles; source controls; and equipment that could fail and result in stormwater contamination.
- Keep ample supplies of absorbents and be able to deploy these materials rapidly to activities where spills or leaks occur.
- Clean out the stormwater drains every six months; and

- Keep personnel appropriately trained.

AerSale will keep ample supplies of absorbents and/or industrial storm wattles and locate them either near to, or such that they can be quickly moved to, the:

- Aircraft Fueling and De-fueling and Vehicle Fueling areas;
- Ground Vehicle Maintenance areas;
- Reusable Parts and Fluids' Removal areas;
- Fuel Storage areas including their secondary containment;
- Loading/Unloading areas;
- Aircraft Parking areas;
- Waste Materials' Storage areas;
- Employee/Vendor Parking areas;
- Equipment Storage areas; and
- Aircraft, Ground Vehicle, and Equipment Awaiting Maintenance areas.

AerSale will store non-fuel unused materials in totally enclosed facilities. AerSale will store waste materials in totally enclosed buildings with no drains, drains to the Roswell sewer, or drains protected from inflow; or in sheds, or in bermed lean-tos.

Finally, AerSale will keep absorbent materials under parked aircraft; and will place absorbent materials and/or drip pans under potential leak or spill areas when fueling or de-fueling aircraft.

III.B WATER QUALITY-BASED EFFLUENT LIMITS [2.2]

AerSale expects that compliance with this SWPPP will control discharges as necessary to meet the water quality standard of the receiving water, the Hagerman Canal. The Hagerman Canal can be discharged to the Pecos River. The segment of the Pecos River to which the Hagerman Canal can be discharged is an impaired water body. However, if the Best Management Practices (BMPs) listed herein are not as effective as intended, AerSale will utilize industrial storm wattles at the inlet, and/or at the immediate outlet, of Outfall 001.

IV. SCHEDULES AND PROCEDURES [6.2.5]

IV.A. GOOD HOUSEKEEPING

1. General

AerSale will dispose of waste materials, both hazardous and nonhazardous, in accordance with USEPA regulations. At least every three months, AerSale will inspect drums, tanks, and containers for leaks and deteriorating conditions.

AerSale will keep clean all exposed areas that are potential sources of pollutants by performing housekeeping measures that include but are not limited to: store materials in containers that are in good condition and clearly and accurately labeled; and minimize potential for waste and floatable debris to be discharged by keeping them from exposed areas.

2. Aircraft, Ground Vehicle, and Equipment Maintenance and Repair Areas **[8.S.4.1.1]**

AerSale will minimize the contamination of stormwater runoff from all areas used for aircraft, ground vehicle and equipment maintenance and repair by performing maintenance activities indoors or if outdoors, keeping industrial storm wattles around the maintenance and repair areas or around a nearby storm drain if the storm drain will catch *all* stormwater from the area; using drip pans and absorbent materials; maintaining an organized inventory of material used in the maintenance areas; draining all parts of fluids prior to disposal; and using dry cleanup methods.

3. Ground Vehicle Cleaning Areas **[8.S.4.1.2]**

AerSale will perform all ground vehicle cleaning indoors in buildings which have no floor drains, floor drains which drain to the City of Roswell sewer system, or floor drains which are protected from inflow. AerSale will identify the cleaning areas on the ground by signage or other equivalent means.

4. Storage of Aircraft, Ground Vehicle, and Equipment Awaiting Maintenance **[8.S.4.1.3]**

AerSale will store all aircraft, ground vehicle, and equipment awaiting maintenance in designated areas only. These designated areas will be indoors; or, if outdoors, absorbent materials will be kept under engines and spills will be cleaned up immediately using dry methods.

5. Material Storage Areas **[8.S.4.1.4]**

AerSale will store all materials indoors in enclosed facilities, in an area with secondary containment; and will store all materials in containers that are in good condition and clearly and accurately labeled with the container's contents.

6. Aircraft Fuel System and Fueling Areas **[8.S.4.1.5]**

AerSale will minimize discharging pollutants in stormwater from its aircraft fuel system and fueling areas by placing absorbent materials under aircraft during fueling and de-fueling; using drip pans if necessary; and using only dry cleanup methods.

7. Source Reduction and, Management of Runoff **[8.S.4.1.6 and 8.S.4.1.7]**

AerSale does not use urea. It uses limited amounts of glycol: ethylene glycol in vehicles in radiators and windshield washer fluid.

IV.B. MAINTENANCE

1. Actions

AerSale will maintain all control measures and industrial equipment and systems in effective operating condition to minimize pollutant discharges, including:

- inspect and preventively maintain stormwater drains, industrial storm wattles, source controls and equipment;
- keep spill response supplies available and personnel properly trained; and
- clean out the stormwater drains every six months.

2. Frequency

At least every three months AerSale will inspect and perform preventive maintenance and/or repair on all control measures:

- Check all spill response carts to ensure each contains full complement of fresh absorbent, pads, and other materials used for dry cleanup;
- Check that all other materials used for dry cleanup have sufficient quantities and are near enough to potential pollutant sources to deploy these materials quickly in the event of spills and leaks;
- Check that the secondary containment in the Fueling Areas is clean and intact; and
- Check that spare industrial storm wattles are present.

If AerSale finds that control measures need maintenance, repair, or replacement, AerSale will, on the same day the problem is found, take all reasonable steps to prevent discharges until the problem is fixed. AerSale will repair, replace or service those control measures within 14 days or will document why the problem could not be fixed in 14 days per Section VI.B, SUBSEQUENT ACTIONS, below.

Attachment E contains the maintenance records.

IV.C. SPILL PREVENTION AND RESPONSE PROCEDURES

1. Actions

AerSale will minimize the potential for leaks, spills, and other releases that may be exposed to stormwater by the following procedures.

- Clearly and accurately label containers (e.g., "Used Jet A Fuel," "Used Oil," "Spent Solvents") that could be susceptible to spillage or leakage;
- Implement procedures for material storage and handling, including using secondary containment in the Fueling Areas;
- Train employees to expeditiously stop, contain, and clean up leaks, spills, and other releases;
- Keep industrial storm wattles around all outdoor maintenance and repair areas if no storm drains are nearby that will catch all stormwater from the area. If there are, place the industrial storm wattle around the storm drain;
- Keep spill response carts and other dry-cleaning supplies near areas where spills may occur; and
- Have procedures to notify appropriate AerSale personnel including emergency personnel.

2. Reporting Hazardous Substances' Release **[2.1.2.4, 7.6, Appendix B, Section 12.F]**

Table 302.4 of 40 CFR §302, lists several hazardous substances and their reportable quantities. If spills or releases of these substances occur in amounts equal to or greater than their reportable quantity, AerSale will report such spills ***within 24 hours after becoming aware of the circumstances*** to the

a. National Response Center (800) 424-8802,
b. New Mexico Emergency Operations Center (505-476-9635),
c. local authorities (575-624-6740 or 575-910-5033),
d. state authorities (NM Emergency Operations Center, 505-476-9635), and
e. the Region 6 EPA Public Information Center (800-887-6063).

AerSale will follow up ***within five (5) days*** with a written report to the addresses below. AerSale will maintain this contact information in locations that are readily available and accessible.

Aersale will also document these spills and notifications in this SWPPP. Attachment F contains records of spills and spill reports.

New Mexico Department of Homeland Security and Emergency Management
P.O. Box 27111 (Mail)
13 Bataan Blvd (FEDEX/UPS)
Santa Fe, NM 87502

U.S. EPA Region 6
Permitting Section (WD-PE)
1201 Elm Street, Suite 500
Dallas, TX 75270

IV.D. EMPLOYEE TRAINING

1. General

AerSale will train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for tasks to meet the conditions of this permit, including all members of AerSale's Stormwater Pollution Prevention Team. AerSale will ensure that the employees understand the requirements of this permit, as identified in this SWPPP, and their specific responsibilities with respect to those requirements.

2. Employees Trained

The employees trained will include:

- Personnel responsible for designing, installing, maintaining, and/or repairing controls including pollution prevention measures;
- Personnel responsible for storing and handling materials that could pollute stormwater discharges;
- Personnel responsible for conducting and documenting inspections; and
- Personnel responsible for taking and documenting corrective actions.

3. Content of Training

As related to the scope of their job duties, AerSale will train these employees in:

- An overview of what is in this SWPPP;
- Spill response procedures, good housekeeping, maintenance requirements, and material management practices;
- The location of all permit-required controls and how such controls are to be maintained;
- The proper procedures to follow with respect to the permit's pollution prevention requirements; and
- When and how to conduct inspections, record applicable findings, and take corrective actions.

4. Frequency

Training frequency will be annually for all employees having these responsibilities. For individual employees, training will occur when an employee is first assigned to a position having these responsibilities or when an employee's responsibilities change.

5. Record Keeping

AerSale will maintain a log of the dates on which specific employees received training. Each log will contain the names, responsibilities, and signatures of the employees and will provide an overview of what was covered in the training.

Attachment G contains these training logs.

V. INSPECTIONS AND ASSESSMENTS

V.A. ROUTINE FACILITY INSPECTIONS [3.1]

1. Schedule and Items Inspected.

At least quarterly, during normal working hours, AerSale will inspect areas covered by the permit's requirements including, but not limited to:

- areas where industrial materials or activities are exposed to stormwater;
- areas identified in this SWPPP that are potential pollutant sources (PPS);
- areas where spills or leaks have occurred during the past three years;
- physical conditions around the AerSale Outfall 001; and
- control measures used to comply with this permit.

At least monthly, during normal working hours, AerSale will inspect decommissioned equipment and equipment that has been idle for more than four weeks.

During the inspections, the inspectors will look for:

- industrial materials, residue, or trash that may have or could contact stormwater;
- leaks or spills from equipment, drums, tanks, or other containers;
- offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site;
- tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas;
- control measures needing replacing, maintenance, or repair; and
- channel or streambank erosion and/or scour in the AerSale Outfall 001

At least once each calendar year, AerSale will conduct a routine inspection when a stormwater discharge is occurring. During this inspection, AerSale will observe the AerSale Outfall 001 and look for evidence of pollutants in the discharge, e.g., an oil sheen.

2. Employees Conducting Inspections

AerSale will ensure that employees who conduct the inspections will be "qualified personnel;" i.e., those employees who

- know the principles and practices of industrial stormwater controls and pollution prevention;
- have the education and ability to assess conditions at AerSale that could impact stormwater quality; and
- have the education and ability to assess the effectiveness of stormwater controls selected and installed to meet the permit requirements.

At least one member of the Stormwater Pollution Prevention Team will be among those employees who conduct the inspections. The inspectors will consider the results of visual inspections during the past year when planning or conducting inspections.

The positions of employees conducting the inspections are as follows.
Primary: Director of Quality or Designee.
Secondary: Quality Assurance Manager or Designee

3. Record Keeping

AerSale will document each inspection's findings and will maintain this report with this SWPPP. The year's findings will be summarized in the annual report.

Findings documented will include, but not be limited to:

- the inspection date and time;
- the lead inspector's name and signature; and
- weather information.

In addition, AerSale will document all observations relating to the implementation of control measures, including:

- a description of any discharges occurring during the inspection;
- any previously unidentified discharges from the site and/or pollutants at the site;
- any evidence of, or the potential for, pollutants entering the stormwater drains;
- observations regarding the physical condition of the AerSale Outfall 001 and evidence of pollutants in discharges from the AerSale Outfall 001;
- any control measures needing replacing, maintenance, or repair;
- any additional control measures needed; and
- any incidents of noncompliance.

For the Routine Inspection conducted during a stormwater discharge, AerSale will also record the

- date and duration in hours of the rainfall event;
- the total inches of rainfall for that rainfall event; and
- the number of days since the previous rainfall event when a discharge occurred

AerSale will include in each Routine Inspection Report a statement signed and certified by the AerSale General Manager per Section I. of this SWPPP.

Finally, AerSale will keep with this SWPPP the credentials of the employees conducting the routine inspections, which credentials will show how each employee is a "qualified person."

Attachment H contains the Routine Inspection Reports and the credentials of qualified inspectors.

V.B. RANDOM SPOT INSPECTIONS

All the procedures described above for Routine Facility Inspections will also be carried out, at the AerSale General Manager discretion, on an unannounced, "spot" basis. The AerSale General Manager will determine when and where these "spot" inspections will occur. Attachment H contains the Spot Inspection reports.

V.C. QUARTERLY VISUAL ASSESSMENT OF STORMWATER DISCHARGES [3.2]

1. Schedule

AerSale will attempt to collect a discharge sample for visual assessment during each of four monitoring periods designated by the MSGP: January 1 – March 31, April 1 – June 30, July 1 – September 30, and October 1 – December 31. However, Roswell, New Mexico has an average annual rainfall of 15.11 inches which is within the "semiarid" climate range of 10 to 20 inches, and

it may not rain or snow within these designated periods. Therefore, at least four times a year, when rainfall resulting in a discharge occurs, AerSale will collect a sample from the AerSale Outfall 001 and will visually assess the sample. If it snows, at least one sample will capture snowmelt discharge.

Exceptions to this sampling are when dangerous weather conditions exist, such as high winds, electrical storms, flooding, or other conditions that make collecting a sample impractical, such as extended frozen conditions.

2. Employees Conducting Inspections

The positions of employees conducting the inspections are as follows.
Primary: Director of Quality or Designee.
Secondary: Quality Assurance Manager or Designee

3. Sample Collection and Timing

AerSale will collect at least one grab sample from the discharge at the AerSale Outfall 001 in a fresh, clean container in a manner such that the sample visually represents the stormwater discharge.

If the discharge is from rainfall, AerSale will collect the sample(s) within the first 30 minutes of discharge. If it is impossible to collect a sample within the first 30 minutes, AerSale will collect the sample as soon as practicable after the first 30 minutes. If the discharge is from snowmelt, AerSale will collect the sample(s) any time during the discharge.

4. Sample's Visual Assessment

AerSale will make the visual assessment of the sample in a clean, colorless glass or plastic container and examined in a well-lit area. AerSale will visually inspect the sample for: color, odor, clarity (diminished); floating solids; settled solids; suspended solids; foam; oil sheen; and other obvious indicators of stormwater pollution.

5. Record Keeping **[5.3.1]**

AerSale will document each assessment's findings and will maintain this report with this SWPPP. If the visual assessment does show signs of stormwater pollution, AerSale will document the exceedance within 24 hours of becoming aware of it on a **signed and certified** Corrective Action Report (Attachment J). The year's findings will be summarized in the annual report. Findings documented will include, but not be limited to:

- the sample location, the sample collection date and time;
- the visual assessment date and time;
- the names and signatures of the personnel collecting the sample and performing the visual assessment;
- whether the discharge was from rainfall or snowmelt runoff;
- if the sample was a rainfall sample, the date and duration in hours of the rainfall event, the total inches of rainfall for that rainfall event, and the number of days since the previous rainfall event when a discharge occurred;
- what the discharge looked and smelled like per characteristics listed in V.C.4, above;
- probable sources of any observed stormwater contamination, e.g., an oil sheen;
- if applicable, why it was not possible to collect a rainfall sample within the first 30 minutes;
- if AerSale could not collect a sample due to adverse weather conditions, the rationale for no visual assessment that describes the adverse weather conditions; and

- if AerSale could not collect a sample within a designated time frame, the reason why it could not collect that sample.

AerSale will include in each Visual Assessment Report a statement signed and certified by the AerSale General Manager per Section I. of this SWPPP.

Attachment I contains the Quarterly Visual Assessment reports.

VI. CORRECTIVE ACTIONS AND DEADLINES [5.1.3]

The MSGP requires AerSale to act within two time frames when it takes corrective action: immediate actions and subsequent actions. AerSale will comply with both.

VI.A. IMMEDIATE ACTIONS [5.1.3.1]

1. Timing of Immediate Corrective Action Response

If a corrective action is needed, AerSale will immediately – on the same day the condition requiring corrective action is found, or, if too late on that day to begin corrective action, the following work day – take all reasonable steps to prevent or at least minimize the pollutants' discharge until a permanent solution is installed and operating.

2. Recording the Immediate Corrective Action

AerSale will document in this SWPPP the immediate corrective actions taken. If AerSale concludes that a corrective action is not necessary, AerSale will also document in this SWPPP why the corrective action was not necessary.

Attachment J contains the Corrective Action reports, which reports include immediate actions.

VI.B. SUBSEQUENT ACTIONS [5.1.3.2]

1. Timing of Subsequent Actions' Response

If AerSale determines that additional corrective actions are necessary, it will complete those corrective actions before the next storm event, if possible, and within 14 calendar days from the time it discovered the corrective action condition.

2. Recording the Subsequent Actions

If it is not feasible to complete the corrective action within 14 calendar days, AerSale will document in this SWPPP why not. AerSale will also show in this SWPPP a schedule for completing the work as soon as practicable after the 14-calendar day time frame but no longer than 45 days after discovery.

If AerSale cannot meet the 45-day time frame, it will notify USEPA Region 6 via NetDMR of its intention to exceed the 45 days, its rationale for an extension, and a completion date. AerSale will document this notification to USEPA in this SWPPP as part of its corrective action documentation.

Where the corrective actions result in changes to any of the controls or procedures documented in this SWPPP, AerSale will modify this SWPPP within 14 calendar days after completing the corrective action work.

Attachment J contains the Corrective Action reports, which reports include subsequent actions.

VI.C. CORRECTIVE ACTION RECORD KEEPING [5.3]

AerSale will document in this SWPPP each corrective action condition within 24 hours of becoming aware of the condition, including: a description of the condition triggering the need for corrective action; for any spills or leaks, a description of the incident including material, date/time, amount, location, reason for spill, and any leaks, spills or other releases that resulted in pollutants' discharges to the AerSale Outfall 001 through stormwater or otherwise; the date AerSale identified the condition; description of immediate actions taken and, for spills or leaks, the response actions, the date/time cleanup was completed, notifications made, the staff involved, and any measures taken to prevent the recurrence of the spill or leak; and, a statement signed and certified by the AerSale General Manager per Section I. of this SWPPP.

Attachment J contains the corrective action records.

AerSale will summarize its findings in the annual report per Section X.B of this SWPPP.

VI.D. EFFECT OF CORRECTIVE ACTION [5.1.4]

AerSale understands that if the event triggering the review of this SWPPP is a violation of the MSGP permit, correcting it does not remove the original violation. AerSale understands also that failing to take corrective action within the required time limits is an additional violation of the MSGP permit.

VI.E. CONDITIONS REQUIRING SWPPP REVIEW AND REVISION [5.1.1]

AerSale will review and, if necessary, revise the SWPPP if any of these conditions are met: an unauthorized release or discharge occurs; a required control measure was never installed, was installed incorrectly, or is not being properly operated or maintained; and whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).

Attachment K contains the SWPPP Revisions.

VII. DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS

VII.A. DOCUMENTATION REGARDING ENDANGERED AND THREATENED SPECIES [6.2.6.1] [1.1.4.5]

AerSale's stormwater discharges, allowable non-stormwater discharges, and stormwater discharge-related activities are not likely to adversely affect any species that are federally listed as endangered or threatened ("listed") and are not likely to adversely affect habitat that is designated as "critical habitat" under the Endangered Species Act (ESA). The Criterion met is Criterion C; to wit, federally listed threatened or endangered species or their critical habitat are likely to occur in or near AerSale's "action area," and AerSale's industrial activities' discharges and discharge-related activities are not likely to adversely affect threatened or endangered species or critical habitat. Supporting documents are the NOI and its attachments certified on April 26, 2021.

Attachment L contains these documents.

VII.B. DOCUMENTATION REGARDING HISTORIC PROPERTIES PRESERVATION [6.2.6.2] [1.1.5]

The Criterion met is Criterion A; to wit, AerSale's discharge-related activities (i.e., construction and/or installation of stormwater control measures that involve subsurface disturbance) will not affect historic properties. Supporting documents are the NOI and its attachments certified on April 26, 2021.

Attachment L contains these documents.

VIII. SIGNATURE REQUIREMENTS [6.2.7][8.S.3.3]

This SWPPP is certified, signed, and dated per Section I. of this SWPPP. Attachment A, SWPPP Certification, contains the certification.

IX. REQUIRED SWPPP MODIFICATIONS [5.1.2]

IX.A. CONDITIONS TRIGGERING MODIFICATION

AerSale will modify this SWPPP if any of these conditions occur: construction or a change in design, operation, or maintenance at AerSale that significantly changes the nature of pollutants discharged in stormwater or significantly increases the quantity of pollutants discharged; or where corrective actions result in changes to any of the controls or procedures documented in this SWPPP.

IX.B. MODIFICATION FREQUENCY IF CONTROLS OR PROCEDURES CHANGE

Where corrective actions result in changes to any of the controls or procedures, AerSale will modify this SWPPP within 14 calendar days after completing the corrective action work.

Attachment M contains the SWPPP modifications.

X. SWPPP AVAILABILITY [6.4]

AerSale will retain a complete copy of this SWPPP at its facility in both paper and electronic form, including any documents incorporated by reference and all documentation supporting AerSale's permit eligibility, as well as the signed and dated certification page. AerSale will ensure that this SWPPP is immediately available to AerSale employees; to the USEPA; and to representatives of the U.S. Fish and Wildlife or the National Marine Fisheries Service at the time of an onsite inspection. AerSale will also make this SWPPP available to the public.

X.A. SWPPP POSTING ON THE INTERNET [6.4.1.2]

To comply with the public availability requirements for this SWPPP, AerSale will post this SWPPP on its website,

https://info.aersale.com/hubfs/Production/Quality%20Certificates/AerSale%20SWPPP%200708.pdf?t=1540457328057

To remain current, AerSale will also post any SWPPP modifications, records and other reporting elements required for the previous year on its website. AerSale will update the SWPPP on its website no later than 45 days after conducting the final routine facility inspection for the year.

X.B. ADDITIONAL DOCUMENTATION REQUIREMENTS [6.5]

AerSale will maintain additional information at its Roswell, New Mexico facility:

1. A copy of the NOI submitted to USEPA along with any correspondence exchanged between AerSale and USEPA specific to coverage under the MSGP.

2. A copy of the acknowledgment AerSale received from USEPA assigning its NPDES ID.

3. A copy of the MSGP.

4. Documentation of maintenance and repairs of control measures, including dates of regular maintenance, dates of discovering areas needing repair/replacement, and for repairs, dates that the control measures returned to full function, and the justification for any extended maintenance/repair schedules.

5. All inspection reports, including the Routine Facility Inspection Reports and the Quarterly Visual Inspection Reports.

6. Any deviation from the schedule for visual assessments and/or monitoring and the reason for the deviation; and the corrective action documentation.

7. A summary of all stormwater discharge sampling data collected at the facility during the previous permit term. The summary will include a narrative description (and may include data tables/figures) that adequately summarizes the collected sampling data. **[6.2.3.6]**

Attachment N contains the NOI, the associated USEPA correspondence, and a copy of the MSGP.

XI. REPORTING AND RECORDING – ANNUAL REPORT [7.]

XI.A. ELECTRONIC REPORTING REQUIREMENTS [7.2]

AerSale will submit the annual report using USEPA's NeT reporting tool via NETMSGP.

XI.B. ANNUAL REPORT

1. Deadline and Reporting Period

AerSale will submit an annual report to USEPA electronically by January 30 of each year of MSGP coverage. The report will contain information generated from the previous calendar year.

2. Contents of Report

AerSale will include in the annual report the following information.

a. A summary of the past year's Routine Inspection reports. **[7.4.1]**

b. A statement that AerSale conducted no pavement deicing and used no urea. **[7.4.1]**

c. A summary of the past year's Quarterly Visual Assessment reports. **[7.4.2]**

d. A summary of the past year's Corrective Action reports including any required AIM documentation. If corrective action is not yet completed by the annual report's submission time, AerSale will describe the status of any outstanding corrective action(s). **[7.4.3]**

e. A description of any incidents of noncompliance, of, if none, a statement that AerSale is in compliance. **[7.4.3]**

f. A statement, signed and dated by the AerSale General Manager, saying the following. **[Appendix B, Subsection 11.E]**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Attachment O contains the Annual Reports.

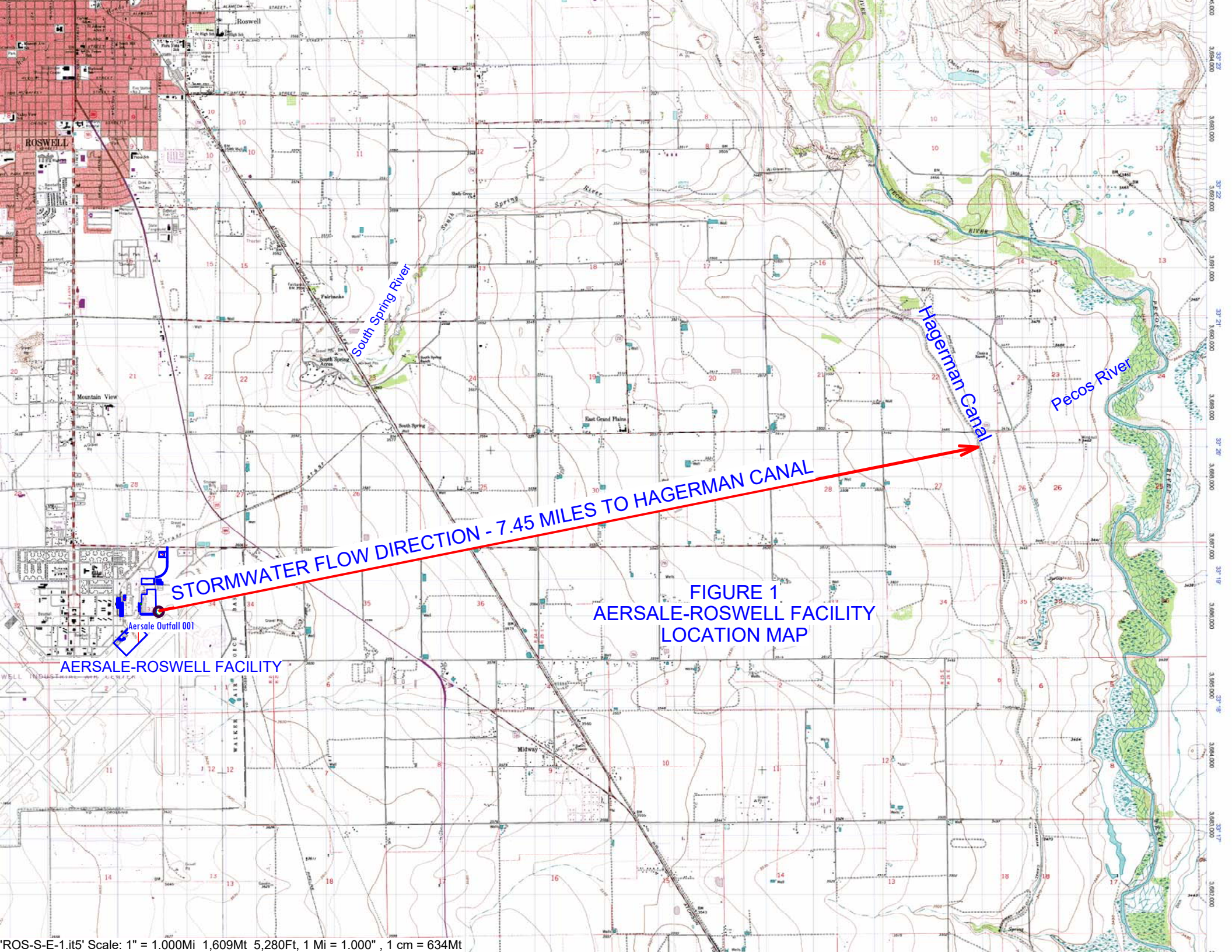
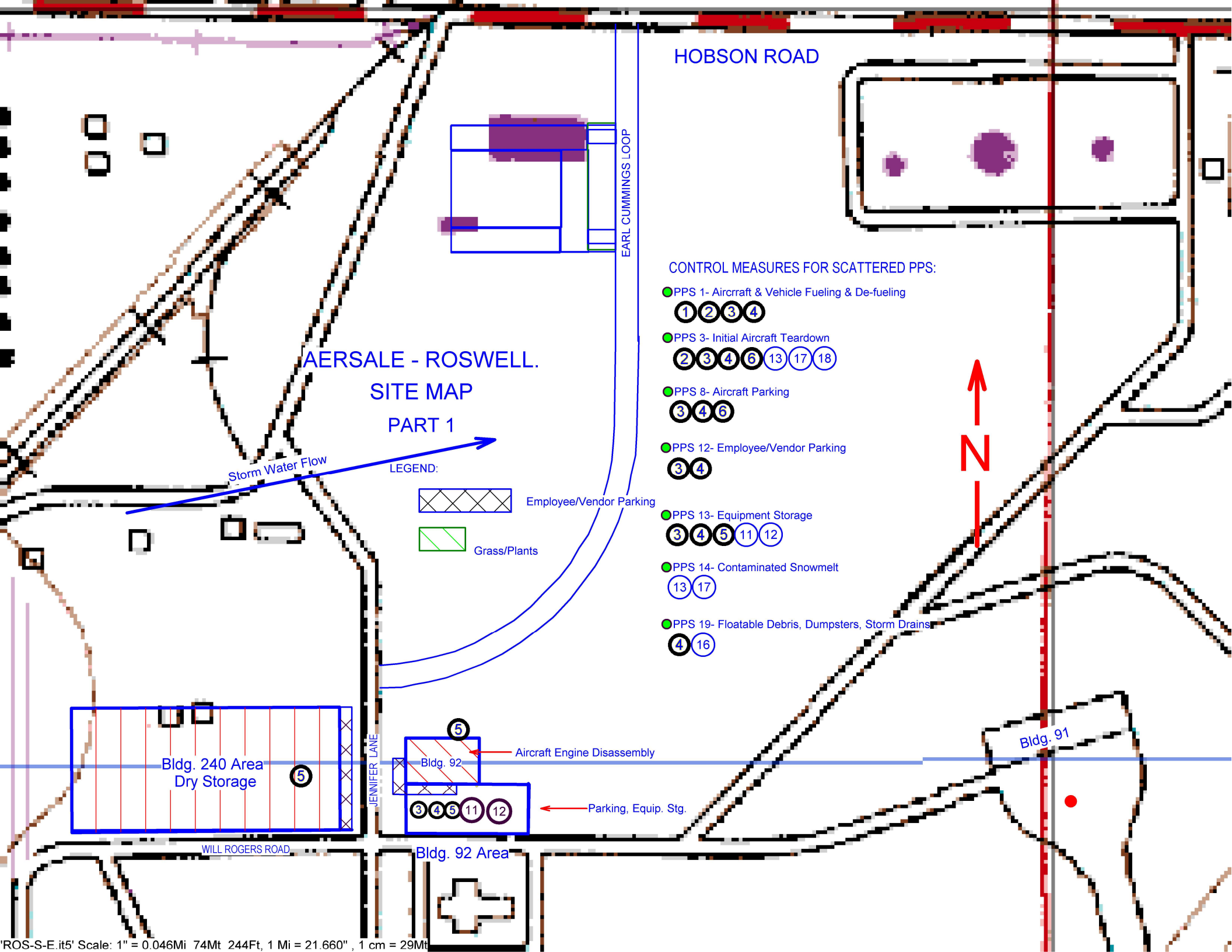


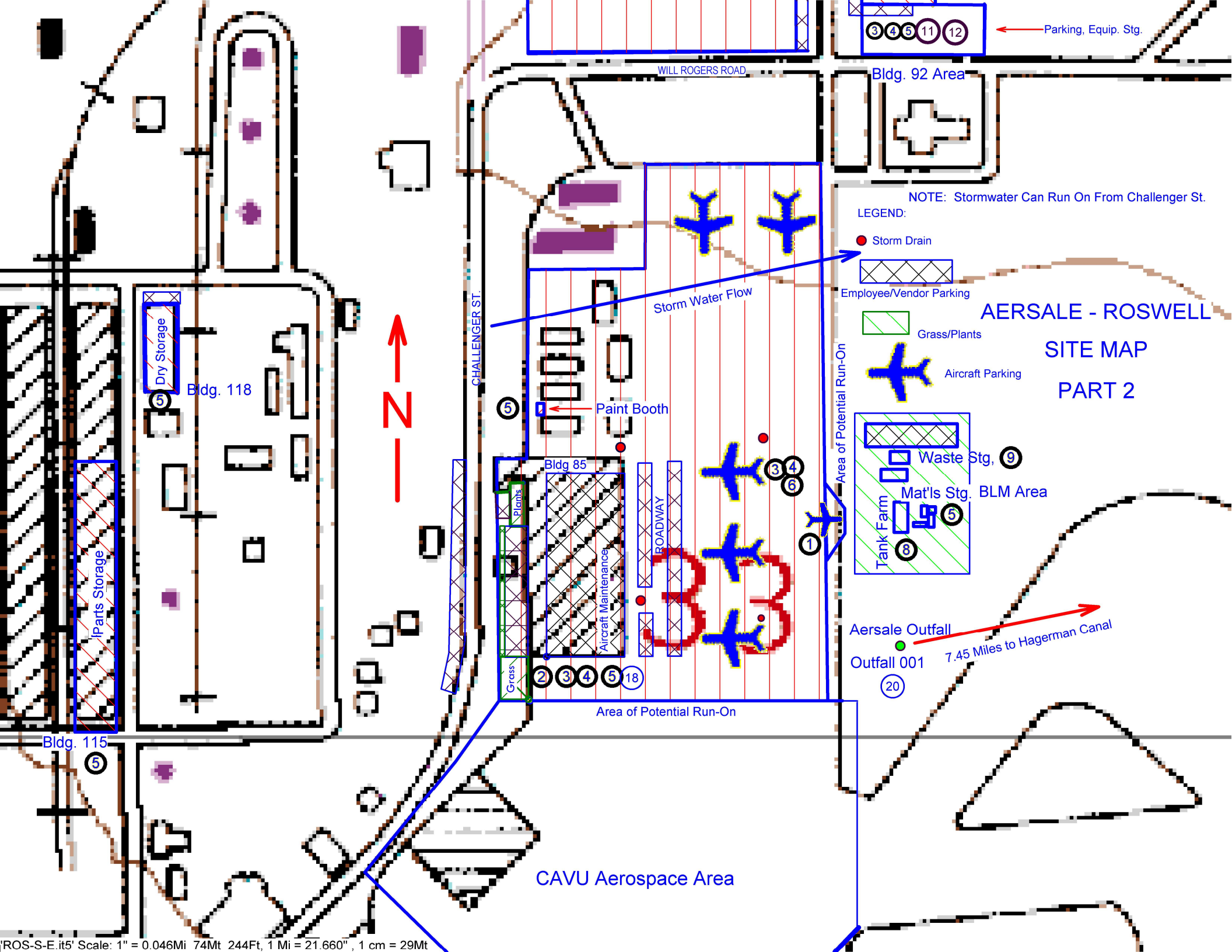
FIGURE 1
AERSALE-ROSWELL FACILITY
LOCATION MAP

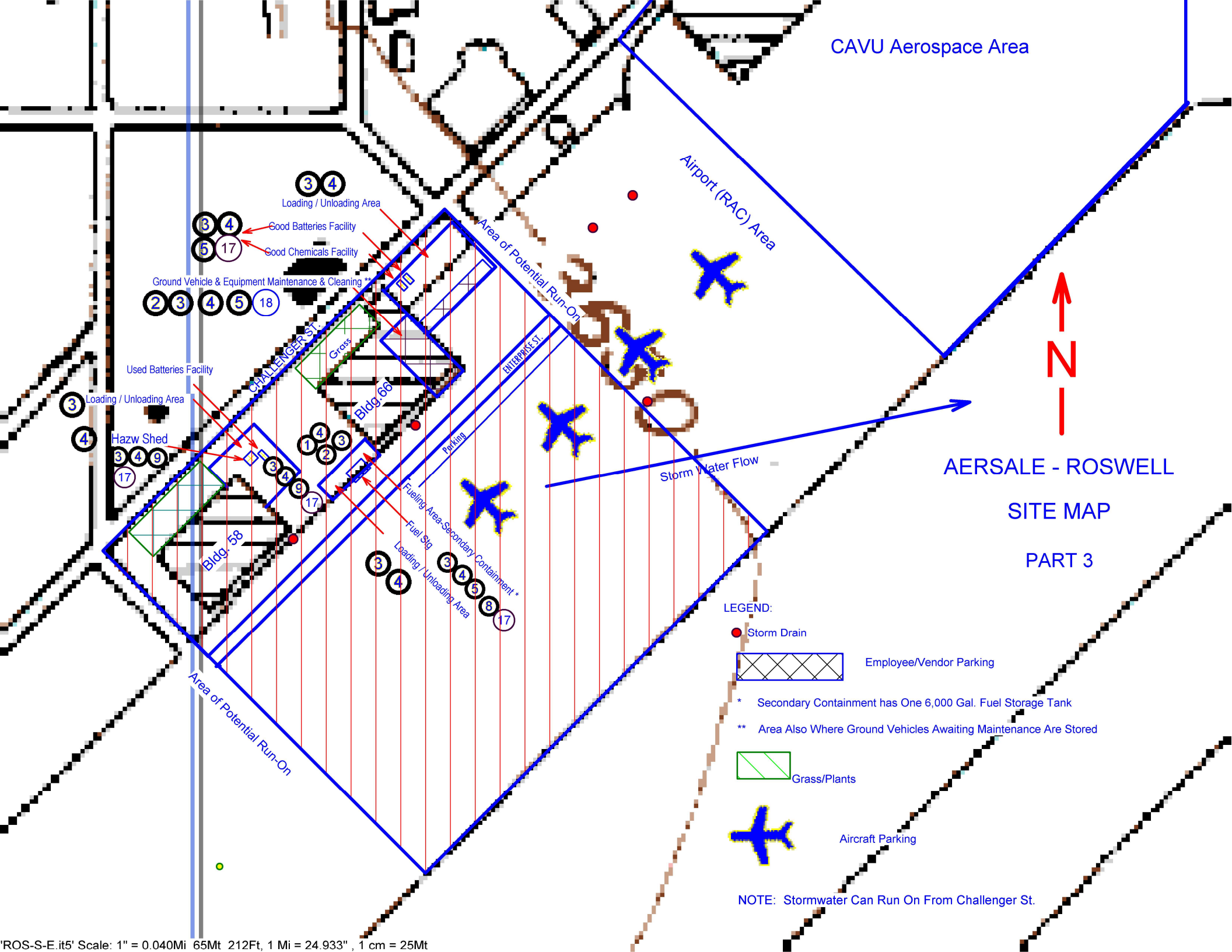
'ROS-S-E-1.it5' Scale: 1" = 1.000Mi 1,609Mt 5,280Ft, 1 Mi = 1.000" , 1 cm = 634Mt

FIGURE 2

SITE MAP


HOBSON ROAD
EARL CUMMINGS LOOP
AERSALE - ROSWELL.
SITE MAP
PART 1
Storm Water Flow
LEGEND:
Employee/Vendor Parking
Grass/Plants
CONTROL MEASURES FOR SCATTERED PPS:
PPS 1- Aircraft & Vehicle Fueling & De-fueling
1 2 3 4
PPS 3- Initial Aircraft Teardown
2 3 4 6 13 17 18
PPS 8- Aircraft Parking
3 4 6
PPS 12- Employee/Vendor Parking
3 4
PPS 13- Equipment Storage
3 4 5 11 12
PPS 14- Contaminated Snowmelt
13 17
PPS 19- Floatable Debris, Dumpsters, Storm Drains
4 16
N
Bldg. 240 Area
Dry Storage
5
JENNIFER LANE
5
Bldg. 92
Aircraft Engine Disassembly
3 4 5 11 12
Parking, Equip. Stg.
Bldg. 91
WILL ROGERS ROAD
Bldg. 92 Area
'ROS-S-E.it5' Scale: 1" = 0.046Mi 74Mt 244Ft, 1 Mi = 21.660" , 1 cm = 29Mt


WILL ROGERS ROAD
Bldg. 92 Area
3 4 5 11 12
Parking, Equip. Stg.
NOTE: Stormwater Can Run On From Challenger St.
LEGEND:
Storm Drain
Employee/Vendor Parking
Grass/Plants
Aircraft Parking
AERSALE - ROSWELL
SITE MAP
PART 2
Storm Water Flow
CHALLENGER ST.
Area of Potential Run-On
Dry Storage
Bldg. 118
5
N
Paint Booth
Bldg 85
Plants
Aircraft Maintenance
ROADWAY
Grass
2 3 4 5 18
Area of Potential Run-On
Waste Stg, 9
Mat'ls Stg. BLM Area
Tank Farm
8
Parts Storage
Bldg. 115
Aersale Outfall
Outfall 001
20
7.45 Miles to Hagerman Canal
CAVU Aerospace Area
'ROS-S-E.it5' Scale: 1" = 0.046Mi 74Mt 244Ft, 1 Mi = 21.660" , 1 cm = 29Mt



'ROS-S-E.it5' Scale: 1" = 0.040Mi 65Mt 212Ft, 1 Mi = 24.933" , 1 cm = 25Mt

ATTACHMENT A

SWPPP CERTIFICATION

I certify under penalty of law that this document, entitled:

2021 Multi-Sector General Permit
Storm Water Pollution Prevention Plan
AerSale Inc.
Roswell, New Mexico Facility

dated April 26, 2021, and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Randy Phelps

Title: General Manager
AerSale,Inc.
Roswell, New Mexico Facility

Signature: _____

Date: _____

ATTACHMENT B

CONTROL MEASURES CHART

	CONTROL MEASURE NO. ON SITE MAP	1	2	3	4	5	6	7
		Fueling operations (incl. tank trucks fuel transfer) conducted on impervious pad	Drip pans used where fuel leaks or spills can occur & where making or breaking hose connections	Spill kits or absorbent materials kept near Activity	Spills/leaks cleaned up immediately using dry methods	Activity indoors with no floor drains, floor drains to sewer, or protected unknown floor drains	Absorbent materials under engines	N/A
PPS NO.	POTENTIAL POLLUTANT SOURCE (PPS)							
1	Aircraft and Vehicle Fueling and Aircraft De-fueling	X	X	X	X			
2	Ground Vehicle & Equipment Maintenance - Bldg.66		X	X	X	X		
3	Aircraft Fluids' and Reusable Parts' Removal		X	X	X		X	
4	To Be Determined							
5	Fuel Storage			X	X	X		
6	Loading/Unloading			X	X			
7	Aircraft Maintenance - Bldg. 85		X	X	X	X		
8	Aircraft Parking			X	X		X	
9	Waste Materials' Storage- Hazw Shed, Used Batteries Facility			X	X			
10	Non-fuel Unused Materials' Storage - Good Chemicals & Good Batteries Facilities & Paint Booth Bldg.			X	X	X		
11	Ground Vehicle Cleaning Bldg. 66					X		
12	Employee/Vendor Parking			X	X			
13	Equipment Storage			X	X	X		
14	Contaminated Snowmelt							
17	Aircraft, Ground Vehicle, and Equipment Awaiting Maintenance			X	X	X	X	
18	Painting - Paint Booth Bldg.					X		
19	AerSale-Wide Activities: Floatable Debris, Dumpsters, Storm Drains				X			
20	AerSale Outfall 001							

	CONTROL MEASURE NO. ON SITE MAP	8	9	11	12	13	14
		Stored in designated fueling areas on impervious surfaces with secondary containment	Stored on impervious surface in closed containers, totally enclosed sheds, or covered and bermed lean-tos, all protected from rainfall and snowfall.	Drained of all fluids prior to activity	If outdoors, stored covered & on pallets or enclosed in plastic.	Fluids collected immediately & stored in closed containers in Waste Materials' storage areas or in fuel-recycling areas for resale.	Activity in designated, impervious area only.
PPS NO.	POTENTIAL POLLUTANT SOURCE (PPS)						
1	Aircraft and Vehicle Fueling and Aircraft De-fueling						
2	Ground Vehicle & Equipment Maintenance - Bldg.66						
3	Aircraft Fluids' and Reusable Parts' Removal					X	
4	To Be Determined						
5	Fuel Storage	X					
6	Loading/Unloading						
7	Aircraft Maintenance - Bldg. 85						
8	Aircraft Parking						
9	Waste Materials' Storage- Hazw Shed, Used Batteries Facility		X				
10	Non-fuel Unused Materials' Storage - Good Chemicals & Good Batteries Facilities & Paint Booth Bldg.						
11	Ground Vehicle Cleaning Bldg. 66						
12	Employee/Vendor Parking						
13	Equipment Storage			X	X		
14	Contaminated Snowmelt					X	
17	Aircraft, Ground Vehicle, and Equipment Awaiting Maintenance						X
18	Painting - Paint Booth Bldg.						
19	AerSale-Wide Activities: Floatable Debris, Dumpsters, Storm Drains						
20	AerSale Outfall 001						

	CONTROL MEASURE NO. ON SITE MAP	16	17	18	19	20
		Remove floatable debris to dumpsters. Clean out storm drains every six (6) months.	Containers in good condition and clearly and accurately labeled	Good-condition Industrial Storm Wattle kept around aircraft, scrap materials, and/or maintenance area; or wattle kept around nearby storm drain IF THAT DRAIN CATCHES ALL STORMWATER FROM AREA.	Lead-acid batteries segregated & placed in closed containers in Waste Materials' storage areas or enclosed sheds	No channel or streambank erosion, or scour is occurring in Outfall.
PPS NO.	POTENTIAL POLLUTANT SOURCE (PPS)					
1	Aircraft and Vehicle Fueling and Aircraft De-fueling					
2	Ground Vehicle & Equipment Maintenance - Bldg.66			X		
3	Aircraft Fluids' and Reusable Parts' Removal		X	X		
4	To Be Determined					
5	Fuel Storage		X			
6	Loading/Unloading					
7	Aircraft Maintenance - Bldg. 85			X		
8	Aircraft Parking					
9	Waste Materials' Storage- Hazw Shed, Used Batteries Facility		X			
10	Non-fuel Unused Materials' Storage - Good Chemicals & Good Batteries Facilities & Paint Booth Bldg.		X			
11	Ground Vehicle Cleaning Bldg. 66					
12	Employee/Vendor Parking					
13	Equipment Storage					
14	Contaminated Snowmelt		X			
17	Aircraft, Ground Vehicle, and Equipment Awaiting Maintenance					
18	Painting - Paint Booth Bldg.					
19	AerSale-Wide Activities: Floatable Debris, Dumpsters, Storm Drains	X				
20	AerSale Outfall 001					X

ATTACHMENT C

NMED SURFACE WATER BUREAU DATA ON HAGERMAN CANAL WATER HARDNESS

mary

From: Valenta, Daniel, NMENV <Daniel.Valenta@state.nm.us>
Sent: Wednesday, January 16, 2019 9:00 AM
To: mary
Subject: RE: [EXT] RE: Lat/Long of point at which Hagerman Canal can be discharged to Pecos River: Need water hardness in this area [CaCO3 in mg/l]

You might want to use an average of the three samples.

From: mary <mary@barronsenvironmental.com>
Sent: Wednesday, January 16, 2019 8:35 AM
To: Valenta, Daniel, NMENV <Daniel.Valenta@state.nm.us>
Subject: [EXT] RE: Lat/Long of point at which Hagerman Canal can be discharged to Pecos River: Need water hardness in this area [CaCO3 in mg/l]

OK, I'm going to use the most recent value of 1964.33 mg/l. Thanks!

Mary Barron

From: Valenta, Daniel, NMENV <Daniel.Valenta@state.nm.us>
Sent: Tuesday, January 15, 2019 2:02 PM
To: mary <mary@barronsenvironmental.com>
Subject: FW: Lat/Long of point at which Hagerman Canal can be discharged to Pecos River: Need water hardness in this area [CaCO3 in mg/l]

Hi Mary,
We have three results in 2013 from a station on the Pecos about 3 miles downstream of those coordinates. We can calculate hardness from the calcium and magnesium dissolved metal results.

2013-10-30 18:05 Calculated Hardness as CaCO3, mg/L = 1964.33
2013-06-04 16:00 Calculated Hardness as CaCO3, mg/L = 2826.12
2013-08-13 18:15 Calculated Hardness as CaCO3, mg/L = 854.91

Let me know if you have any questions…

Best,
Daniel

From: Valenta, Daniel, NMENV
Sent: Tuesday, January 15, 2019 9:55 AM
To: Barrios, Kristopher, NMENV <Kristopher.Barrios@state.nm.us>
Subject: Lat/Long of point at which Hagerman Canal can be discharged to Pecos River: Need water hardness in this area [CaCO3 in mg/l]

Chris

I am looking for any data we may have on the hardness ($CaCO_3$) in the section of the Pecos river near where the Hagerman canal discharges. See coordinates below. I am searching the data base but still struggle to find something. If this request needs to be sent to someone else, please forward. If you need more information let me know I will drop by.

Thanks

dv

From: mary <mary@barronsenvironmental.com>
Sent: Monday, January 14, 2019 4:40 PM
To: Valenta, Daniel, NMENV <Daniel.Valenta@state.nm.us>
Subject: [EXT] Lat/Long of point at which Hagerman Canal can be discharged to Pecos River: Need water hardness in this area [$CaCO_3$ in mg/l]

Daniel,

The coordinates of the entry point of the Hagerman Canal to the Pecos river are:

33° 14' 32.51" N, 104° 21' 16.18" W NAD83

Thanks so much,

Mary Barron

ATTACHMENT D

INDICATOR AND BENCHMARK MONITORING RESULTS, IMPAIRED WATERS MONITORING TEMPERATURE LOGS, AND DMR REPORTS

AerSale, Inc. Roswell

Benchmark Monitoring Sample Results vs MCLs

					COD	TSS	Al	Cu	Pb	Zn
YEAR OF	YEAR	QTR	MONTHS	**Benchmark MCL**	**120**	**100**	**1.1**	**0.00519**	**0.262**	**0.26**
COVERAGE					mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
				Sample Date		*	*		*	
1st	2021		MAR-JUN							
1st	2021	2	JUL - SEP	6/28/2021	51.5	160	5.6	0.0067	0.0099	0.05
1st	2021	3	OCT - DEC	NO SAMPLES DUE TO INSUFFICIENT RAIN OR SNOW						
1st	2022	4	JAN - MAR	NO SAMPLES DUE TO INSUFFICIENT RAIN OR SNOW						
2nd	2022	5	APR - JUN	6/17/2022	184	73	4.9	0.0200	0.014	0.093
2nd	2022	6	JUL - SEP	NO SAMPLES DUE TO INSUFFICIENT RAIN OR SNOW						
2nd	2022	7	OCT - DEC	NO SAMPLES DUE TO INSUFFICIENT RAIN OR SNOW						
2nd	2023	8	JAN - MAR	1/25/2023	52.0	26	2.2	0.0050	0.0037	0.030
3rd	2023	9	APR - JUN							

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

February 14, 2023

William Skipper
AerSale, Inc
703 E. Challenger St.
Roswell, NM 88203
TEL: (575) 624-3140
FAX:

RE: MSGP Sampling OrderNo.: 2301A53

Dear William Skipper:

Hall Environmental Analysis Laboratory received 1 sample(s) on 1/27/2023 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0901

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

Analytical Report
Lab Order **2301A53**
Date Reported: **2/14/2023**

CLIENT: AerSale, Inc
Client Sample ID: Outfall 001
Project: MSGP Sampling
Collection Date: 1/25/2023 10:25:00 AM
Lab ID: 2301A53-001
Matrix: AQUEOUS
Received Date: 1/27/2023 8:40:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA 200.8: METALS						Analyst: **ELS**	
Copper	0.0050	0.0010		mg/L	1	2/7/2023 2:48:46 PM	73012
Lead	0.0037	0.00050		mg/L	1	2/7/2023 2:48:46 PM	73012
SM 2540D: TSS						Analyst: **KS**	
Suspended Solids	26	4.0		mg/L	1	2/1/2023 11:29:00 AM	72915
EPA METHOD 200.7: METALS						Analyst: **VP**	
Aluminum	2.2	0.10	*	mg/L	5	2/6/2023 1:17:36 PM	72893
Zinc	0.030	0.010		mg/L	1	2/10/2023 1:36:31 PM	72893

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix
E	Above Quantitation Range/Estimated Value
H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit
P	Sample pH Not In Range
PQL	Practical Quanitative Limit
RL	Reporting Limit
S	% Recovery outside of standard limits. If undiluted results may be estimated.

ANALYTICAL REPORT

February 02, 2023

Hall Environmental Analysis Laboratory

Sample Delivery Group: L1580743

Samples Received: 01/31/2023

Project Number:

Description:

Report To: Andy Freeman
4901 Hawkins NE
Albuquerque, NM 87109

Entire Report Reviewed By:

John Hawkins
Project Manager

Pace Analytical National
12065 Lebanon Rd Mount Juliet, TN 37122 615-758-5858 800-767-5859 www.pacenational.com

TABLE OF CONTENTS

SAMPLE SUMMARY

2301A53-001C OUTFALL 001 L1580743-01 WW

	Collected by	Collected date/time	Received date/time
		01/25/23 10:25	01/31/23 09:30

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Wet Chemistry by Method 410.4	WG1998558	1	02/02/23 08:56	02/02/23 11:36	CAH	Mt. Juliet, TN

CASE NARRATIVE

All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

John Hawkins
Project Manager

Wet Chemistry by Method 410.4

Analyte	Result	Qualifier	RDL	Dilution	Analysis	Batch
	mg/l		mg/l		date / time	
COD	52.0		20.0	1	02/02/2023 11:36	WG1998558

Method Blank (MB)

(MB) R3886722-1 02/02/23 11:34

Analyte	MB Result mg/l	MB Qualifier	MB MDL mg/l	MB RDL mg/l
COD	U		11.7	20.0

L1580546-01 Original Sample (OS) • Duplicate (DUP)

(OS) L1580546-01 02/02/23 11:34 • (DUP) R3886722-3 02/02/23 11:36

Analyte	Original Result mg/l	DUP Result mg/l	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
COD	ND	ND	1	0.000		20

L1580914-01 Original Sample (OS) • Duplicate (DUP)

(OS) L1580914-01 02/02/23 11:47 • (DUP) R3886722-6 02/02/23 11:47

Analyte	Original Result mg/l	DUP Result mg/l	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
COD	ND	ND	1	0.000		20

Laboratory Control Sample (LCS)

(LCS) R3886722-2 02/02/23 11:34

Analyte	Spike Amount mg/l	LCS Result mg/l	LCS Rec. %	Rec. Limits %	LCS Qualifier
COD	500	463	92.5	90.0-110	

L1580855-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1580855-01 02/02/23 11:43 • (MS) R3886722-4 02/02/23 11:43 • (MSD) R3886722-5 02/02/23 11:43

Analyte	Spike Amount mg/l	Original Result mg/l	MS Result mg/l	MSD Result mg/l	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
COD	500	80.7	548	533	93.5	90.5	1	80.0-120			2.83	20

GLOSSARY OF TERMS

Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Results Disclaimer - Information that may be provided by the customer, and contained within this report, include Permit Limits, Project Name, Sample ID, Sample Matrix, Sample Preservation, Field Blanks, Field Spikes, Field Duplicates, On-Site Data, Sampling Collection Dates/Times, and Sampling Location. Results relate to the accuracy of this information provided, and as the samples are received.

Abbreviations and Definitions

MDL	Method Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
RDL	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state “ND” (Not Detected) or “BDL” (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

Qualifier | Description

The remainder of this page intentionally left blank, there are no qualifiers applied to this SDG.

ACCREDITATIONS & LOCATIONS

Pace Analytical National 12065 Lebanon Rd Mount Juliet, TN 37122

Alabama	40660	Nebraska	NE-OS-15-05
Alaska	17-026	Nevada	TN000032021-1
Arizona	AZ0612	New Hampshire	2975
Arkansas	88-0469	New Jersey–NELAP	TN002
California	2932	New Mexico [1]	TN00003
Colorado	TN00003	New York	11742
Connecticut	PH-0197	North Carolina	Env375
Florida	E87487	North Carolina [1]	DW21704
Georgia	NELAP	North Carolina [3]	41
Georgia [1]	923	North Dakota	R-140
Idaho	TN00003	Ohio–VAP	CL0069
Illinois	200008	Oklahoma	9915
Indiana	C-TN-01	Oregon	TN200002
Iowa	364	Pennsylvania	68-02979
Kansas	E-10277	Rhode Island	LAO000356
Kentucky [1 6]	KY90010	South Carolina	84004002
Kentucky [2]	16	South Dakota	n/a
Louisiana	AI30792	Tennessee [1 4]	2006
Louisiana	LA018	Texas	T104704245-20-18
Maine	TN00003	Texas [5]	LAB0152
Maryland	324	Utah	TN000032021-11
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	110033
Minnesota	047-999-395	Washington	C847
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	998093910
Montana	CERT0086	Wyoming	A2LA
A2LA – ISO 17025	1461.01	AIHA-LAP,LLC EMLAP	100789
A2LA – ISO 17025 [5]	1461.02	DOD	1461.01
Canada	1461.01	USDA	P330-15-00234
EPA–Crypto	TN00003		

[1] Drinking Water [2] Underground Storage Tanks [3] Aquatic Toxicity [4] Chemical/Microbiological [5] Mold [6] Wastewater n/a Accreditation not applicable

* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace Analytical.

HALL ENVIRONMENTAL ANALYSIS LABORATORY

CHAIN OF CUSTODY RECORD

PAGE: 1 OF: 1

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975
FAX: 505-345-4107
Website: www.hallenvironmental.com

SUB CONTRATOR: Pace TN	COMPANY: PACE TN		PHONE: (800) 767-5859	FAX: (615) 758-5859	
ADDRESS: 12065 Lebanon Rd			ACCOUNT #:	EMAIL:	
CITY, STATE, ZIP: Mt. Juliet, TN 37122					

L1580743

ITEM	SAMPLE	CLIENT SAMPLE ID	BOTTLE TYPE	MATRIX	COLLECTION DATE	# CONTAINERS	ANALYTICAL COMMENTS
1	2301A53-001C	Outfall 001	~~500H~~DPEH2 SO4	Aqueous	1/25/2023 10:25:00 AM	1	COD -01

4.5+c=4.5

5719 6195 0631

125 KPC 1.27.23

J053

Sample Receipt Checklist

COC Seal Present/Intact:	Y N	If Applicable	
COC Signed/Accurate:	Y N	VOA Zero Headspace:	Y N
Bottles arrive intact:	Y N	Pres.Correct/Check:	Y N
Correct bottles used:	Y N		
Sufficient volume sent:	Y N		
RAD Screen <0.5 mR/hr:	Y N		

SPECIAL INSTRUCTIONS / COMMENTS:

Please include the LAB ID and the CLIENT SAMPLE ID. Please e-mail results to lab@hallenvironmental.com. Please return all coolers and blue ice. Thank you.

Relinquished By:	Date: 1/27/2023	Time: 9:57 AM	Received By:	Date:	Time:
Relinquished By:	Date:	Time:	Received By:	Date:	Time:
Relinquished By:	Date:	Time:	Received By:	Date: 1/31/23	Time: 9:30

TAT: Standard ☐ RUSH Next BD ☐ 2nd BD ☐ 3rd BD ☐

REPORT TRANSMITTAL DESIRED:

☐ HARDCOPY (extra cost) ☐ FAX ☐ EMAIL ☐ ONLINE

FOR LAB USE ONLY

Temp of samples ____ ℃ Attempt to Cool ? ____

Comments: ____

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2301A53**

14-Feb-23

Client: AerSale, Inc

Project: MSGP Sampling

Sample ID: **MB-72893**	SampType: **MBLK**	TestCode: **EPA Method 200.7: Metals**
Client ID: **PBW**	Batch ID: **72893**	RunNo: **94331**
Prep Date: **1/30/2023**	Analysis Date: **2/1/2023**	SeqNo: **3407360** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	ND	0.020								

Sample ID: **LCSLL-72893**	SampType: **LCSLL**	TestCode: **EPA Method 200.7: Metals**
Client ID: **BatchQC**	Batch ID: **72893**	RunNo: **94331**
Prep Date: **1/30/2023**	Analysis Date: **2/1/2023**	SeqNo: **3407361** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	ND	0.020	0.01000	0	120	50	150			

Sample ID: **LCS-72893**	SampType: **LCS**	TestCode: **EPA Method 200.7: Metals**
Client ID: **LCSW**	Batch ID: **72893**	RunNo: **94331**
Prep Date: **1/30/2023**	Analysis Date: **2/1/2023**	SeqNo: **3407362** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	0.52	0.020	0.5000	0	105	85	115			

Sample ID: **MB-72893**	SampType: **MBLK**	TestCode: **EPA Method 200.7: Metals**
Client ID: **PBW**	Batch ID: **72893**	RunNo: **94353**
Prep Date: **1/30/2023**	Analysis Date: **2/2/2023**	SeqNo: **3408670** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Zinc	ND	0.010								

Sample ID: **LCSLL-72893**	SampType: **LCSLL**	TestCode: **EPA Method 200.7: Metals**
Client ID: **BatchQC**	Batch ID: **72893**	RunNo: **94353**
Prep Date: **1/30/2023**	Analysis Date: **2/2/2023**	SeqNo: **3408671** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Zinc	0.011	0.010	0.01000	0	115	50	150			

Sample ID: **LCS-72893**	SampType: **LCS**	TestCode: **EPA Method 200.7: Metals**
Client ID: **LCSW**	Batch ID: **72893**	RunNo: **94353**
Prep Date: **1/30/2023**	Analysis Date: **2/2/2023**	SeqNo: **3408672** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Zinc	0.51	0.010	0.5000	0	101	85	115			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of standard limits. If undiluted results may be estimated.
B	Analyte detected in the associated Method Blank
E	Above Quantitation Range/Estimated Value
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2301A53**

14-Feb-23

Client: AerSale, Inc

Project: MSGP Sampling

Sample ID: **MB-73012**	SampType: **MBLK**	TestCode: **EPA 200.8: Metals**
Client ID: **PBW**	Batch ID: **73012**	RunNo: **94443**
Prep Date: **2/6/2023**	Analysis Date: **2/7/2023**	SeqNo: **3412402** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Copper	ND	0.0010								
Lead	ND	0.00050								

Sample ID: **MSLCSLL-73012**	SampType: **LCSLL**	TestCode: **EPA 200.8: Metals**
Client ID: **BatchQC**	Batch ID: **73012**	RunNo: **94443**
Prep Date: **2/6/2023**	Analysis Date: **2/7/2023**	SeqNo: **3412406** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Lead	0.00053	0.00050	0.0005000	0	106	50	150			

Sample ID: **MSLCS-73012**	SampType: **LCS**	TestCode: **EPA 200.8: Metals**
Client ID: **LCSW**	Batch ID: **73012**	RunNo: **94443**
Prep Date: **2/6/2023**	Analysis Date: **2/7/2023**	SeqNo: **3412407** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Copper	0.026	0.0010	0.02500	0	103	85	115			
Lead	0.013	0.00050	0.01250	0	102	85	115			

Sample ID: **MSLCSLL-73012**	SampType: **LCSLL**	TestCode: **EPA 200.8: Metals**
Client ID: **BatchQC**	Batch ID: **73012**	RunNo: **94443**
Prep Date: **2/6/2023**	Analysis Date: **2/7/2023**	SeqNo: **3412744** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Copper	0.0011	0.0010	0.001000	0	110	50	150			

Sample ID: **MSLCS-73012**	SampType: **LCS**	TestCode: **EPA 200.8: Metals**
Client ID: **LCSW**	Batch ID: **73012**	RunNo: **94443**
Prep Date: **2/6/2023**	Analysis Date: **2/7/2023**	SeqNo: **3412745** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Copper	0.026	0.0010	0.02500	0	103	85	115			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of standard limits. If undiluted results may be estimated.
B	Analyte detected in the associated Method Blank
E	Above Quantitation Range/Estimated Value
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2301A53**

14-Feb-23

Client: AerSale, Inc

Project: MSGP Sampling

Sample ID: **MB-72915**	SampType: **MBLK**	TestCode: **SM 2540D: TSS**							
Client ID: **PBW**	Batch ID: **72915**	RunNo: **94329**							
Prep Date: **1/31/2023**	Analysis Date: **2/1/2023**	SeqNo: **3407148**	Units: **mg/L**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Suspended Solids	ND	4.0								

Sample ID: **LCS-72915**	SampType: **LCS**	TestCode: **SM 2540D: TSS**							
Client ID: **LCSW**	Batch ID: **72915**	RunNo: **94329**							
Prep Date: **1/31/2023**	Analysis Date: **2/1/2023**	SeqNo: **3407149**	Units: **mg/L**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Suspended Solids	97	4.0	91.90	0	106	83.89	119.7			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of standard limits. If undiluted results may be estimated.
B	Analyte detected in the associated Method Blank
E	Above Quantitation Range/Estimated Value
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: AerSale, Inc | Work Order Number: 2301A53 | RcptNo: 1

Received By: Juan Rojas 1/27/2023 8:40:00 AM

Completed By: Tracy Casarrubias 1/27/2023 9:50:23 AM

Reviewed By: JR 1/27/23

Chain of Custody

1. Is Chain of Custody complete?	Yes ☑	No ☐	Not Present ☐
2. How was the sample delivered?	FedEx		

Log In

3. Was an attempt made to cool the samples?	Yes ☑	No ☐	NA ☐
4. Were all samples received at a temperature of >0° C to 6.0°C	Yes ☑	No ☐	NA ☐
5. Sample(s) in proper container(s)?	Yes ☑	No ☐	
6. Sufficient sample volume for indicated test(s)?	Yes ☑	No ☐	
7. Are samples (except VOA and ONG) properly preserved?	Yes ☑	No ☐	
8. Was preservative added to bottles?	Yes ☐	No ☑	NA ☐
9. Received at least 1 vial with headspace <1/4" for AQ VOA?	Yes ☐	No ☐	NA ☑
10. Were any sample containers received broken?	Yes ☐	No ☑	
11. Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes ☑	No ☐	
12. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	
13. Is it clear what analyses were requested?	Yes ☑	No ☐	
14. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes ☑	No ☐	

# of preserved bottles checked for pH: 2 (3) (<2 or >12 unless noted)

Adjusted? NO

Checked by: KPA 1.27.23

Special Handling (if applicable)

15. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☑

Person Notified: Date:

By Whom: Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding:

Client Instructions:

16. Additional remarks:

17. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	-1.8	Good	Not Present			

Chain-of-Custody Record

Client: Aer Sale

Mailing Address: 703 E. Challenger
Roswell, NM 88203

Phone #: 575-624-3140 x3329

email or Fax#: william.skipper@aersale.com

QA/QC Package:
☐ Standard ☐ Level 4 (Full Validation)

Accreditation: ☐ Az Compliance
☐ NELAC ☐ Other

☐ EDD (Type)

Turn-Around Time:
☐ Standard ☐ Rush

Project Name: MSGP Sampling

Project #: NMR05J01V

Project Manager: William Skipper

Sampler:

On Ice: ☐ Yes ☐ No Yogi 1/27/23

# of Coolers: 1 ~~N/A~~

Cooler Temp(including CF): -1.5-0.3=-1.8°C)

HALL ENVIRONMENTAL ANALYSIS LABORATORY
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Date	Time	Matrix	Sample Name	Container Type and #	Preservative Type	HEAL No. 2301A53	BTEX / MTBE / TMB's (8021)	TPH:8015D(GRO / DRO / MRO)	8081 Pesticides/8082 PCB's	EDB (Method 504.1)	PAHs by 8310 or 8270SIMS	RCRA 8 Metals	Cl, F, Br, NO_3, NO_2, PO_4, SO_4	8260 (VOA)	8270 (Semi-VOA)	Total Coliform (Present/Absent)	COD	TSS	Al, Cu, Pb, Zn Metals
2023 1-25-23	10:25 AM		Out Fall 001 - COD	1/500 ml	H_2SO_4	001											X		
1-25-23	10:25 AM		Out Fall 001 - TSS	1/500 ml	None	~~002~~ YMC 1/27/23												X	
1-25-23	10:25 AM		Out Fall 001 - Al, Pb, Cu, Zn	1/250 ml	HNO_3	~~003~~													X

Date:	Time:	Relinquished by:	Received by:	Via:	Date	Time
1-26-23	10:25 AM	William Skipper		FedEx	1/27/23	9:40
Date:	Time:	Relinquished by:	Received by:	Via:	Date	Time

Remarks: Must Frozen Tm 1/27/23

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

July 12, 2022

David Archibeque

AerSale, Inc
703 E. Challenger St.
Roswell, NM 88203
TEL: (575) 624-3140
FAX:

RE: MSGP Sampling OrderNo.: 2206B51

Dear David Archibeque:

Hall Environmental Analysis Laboratory received 1 sample(s) on 6/22/2022 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0901

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

Analytical Report
Lab Order **2206B51**
Date Reported: **7/12/2022**

CLIENT: AerSale, Inc
Client Sample ID: Outfall 001
Project: MSGP Sampling
Collection Date: 6/17/2022 8:00:00 AM
Lab ID: 2206B51-001
Matrix: AQUEOUS
Received Date: 6/22/2022 8:58:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA 200.8: METALS						Analyst: **bcv**	
Copper	0.020	0.0010		mg/L	1	6/30/2022 2:06:18 PM	68433
Lead	0.014	0.00050		mg/L	1	6/30/2022 2:06:18 PM	68433
SM 2540D: TSS						Analyst: **KS**	
Suspended Solids	73	4.0		mg/L	1	6/23/2022 1:54:00 PM	68290
EPA METHOD 200.7: METALS						Analyst: **JLF**	
Aluminum	4.9	0.20	*	mg/L	10	6/30/2022 5:05:19 PM	68433
Zinc	0.093	0.010		mg/L	1	6/29/2022 10:11:26 PM	68433

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix interference
B	Analyte detected in the associated Method Blank
E	Estimated value
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

ANALYTICAL REPORT

July 12, 2022

Hall Environmental Analysis Laboratory

Sample Delivery Group:	L1508227
Samples Received:	06/23/2022
Project Number:	
Description:	

Report To: Andy Freeman
4901 Hawkins NE
Albuquerque, NM 87109

Entire Report Reviewed By:

John Hawkins
Project Manager

Pace Analytical National
12065 Lebanon Rd Mount Juliet, TN 37122 615-758-5858 800-767-5859 www.pacenational.com

TABLE OF CONTENTS

SAMPLE SUMMARY

2206B51-001C OUTFALL 001 L1508227-01 GW

Collected by	Collected date/time	Received date/time
	06/17/22 08:00	06/23/22 09:00

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Wet Chemistry by Method 410.4	WG1891521	1	07/10/22 20:00	07/11/22 00:06	CRB	Mt. Juliet, TN

CASE NARRATIVE

All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

John Hawkins
Project Manager

Wet Chemistry by Method 410.4

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis	Batch
	ug/l		ug/l	ug/l		date / time	
COD	184000		11700	20000	1	07/11/2022 00:06	WG1891521

Method Blank (MB)

(MB) R3812988-1 07/11/22 00:06

Analyte	MB Result ug/l	MB Qualifier	MB MDL ug/l	MB RDL ug/l
COD	U		11700	20000

L1509495-08 Original Sample (OS) • Duplicate (DUP)

(OS) L1509495-08 07/11/22 00:08 • (DUP) R3812988-5 07/11/22 00:08

Analyte	Original Result ug/l	DUP Result ug/l	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
COD	234000	231000	1	1.16		20

L1509508-01 Original Sample (OS) • Duplicate (DUP)

(OS) L1509508-01 07/11/22 00:17 • (DUP) R3812988-6 07/11/22 00:18

Analyte	Original Result ug/l	DUP Result ug/l	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
COD	147000	143000	1	2.89		20

Laboratory Control Sample (LCS)

(LCS) R3812988-2 07/11/22 00:06

Analyte	Spike Amount ug/l	LCS Result ug/l	LCS Rec. %	Rec. Limits %	LCS Qualifier
COD	500000	496000	99.1	90.0-110	

L1508227-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1508227-01 07/11/22 00:06 • (MS) R3812988-3 07/11/22 00:06 • (MSD) R3812988-4 07/11/22 00:06

Analyte	Spike Amount ug/l	Original Result ug/l	MS Result ug/l	MSD Result ug/l	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
COD	500000	184000	601000	595000	83.3	82.2	1	80.0-120			0.933	20

GLOSSARY OF TERMS

Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Results Disclaimer - Information that may be provided by the customer, and contained within this report, include Permit Limits, Project Name, Sample ID, Sample Matrix, Sample Preservation, Field Blanks, Field Spikes, Field Duplicates, On-Site Data, Sampling Collection Dates/Times, and Sampling Location. Results relate to the accuracy of this information provided, and as the samples are received.

Abbreviations and Definitions

MDL	Method Detection Limit.
RDL	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state “ND” (Not Detected) or “BDL” (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

Qualifier	Description
	The remainder of this page intentionally left blank, there are no qualifiers applied to this SDG.

ACCREDITATIONS & LOCATIONS

Pace Analytical National 12065 Lebanon Rd Mount Juliet, TN 37122

Alabama	40660	Nebraska	NE-OS-15-05
Alaska	17-026	Nevada	TN000032021-1
Arizona	AZ0612	New Hampshire	2975
Arkansas	88-0469	New Jersey–NELAP	TN002
California	2932	New Mexico [1]	TN00003
Colorado	TN00003	New York	11742
Connecticut	PH-0197	North Carolina	Env375
Florida	E87487	North Carolina [1]	DW21704
Georgia	NELAP	North Carolina [3]	41
Georgia [1]	923	North Dakota	R-140
Idaho	TN00003	Ohio–VAP	CL0069
Illinois	200008	Oklahoma	9915
Indiana	C-TN-01	Oregon	TN200002
Iowa	364	Pennsylvania	68-02979
Kansas	E-10277	Rhode Island	LAO000356
Kentucky [1 6]	KY90010	South Carolina	84004002
Kentucky [2]	16	South Dakota	n/a
Louisiana	AI30792	Tennessee [1 4]	2006
Louisiana	LA018	Texas	T104704245-20-18
Maine	TN00003	Texas [5]	LAB0152
Maryland	324	Utah	TN000032021-11
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	110033
Minnesota	047-999-395	Washington	C847
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	998093910
Montana	CERT0086	Wyoming	A2LA
A2LA – ISO 17025	1461.01	AIHA-LAP,LLC EMLAP	100789
A2LA – ISO 17025 [5]	1461.02	DOD	1461.01
Canada	1461.01	USDA	P330-15-00234
EPA–Crypto	TN00003		

[1] Drinking Water [2] Underground Storage Tanks [3] Aquatic Toxicity [4] Chemical/Microbiological [5] Mold [6] Wastewater n/a Accreditation not applicable

* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace Analytical.

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
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CHAIN OF CUSTODY RECORD

PAGE: 1 OF: 1

SUB CONTRATOR: Pace TN	COMPANY: PACE TN	PHONE: (800) 767-5859	FAX: (615) 758-5859
ADDRESS: 12065 Lebanon Rd		ACCOUNT #:	EMAIL:
CITY, STATE, ZIP: Mt. Juliet, TN 37122			

L1508227

ITEM	SAMPLE	CLIENT SAMPLE ID	BOTTLE TYPE	MATRIX	COLLECTION DATE	# CONTAINERS	12 ANALYTICAL COMMENTS
1	2206B51-001C	Outfall 001	500HDPEH2 SO4	Aqueous	6/17/2022 8:00:00 AM	1	COD -01

H095

Count: 1 TRK: 5755 8089 3859

Sample Receipt Checklist

COC Seal Present/Intact:	Y N	If Applicable	
COC Signed/Accurate:	Y N	VOA Zero Headspace:	Y N
Bottles arrive intact:	Y N	Pres.Correct/Check:	Y N
Correct bottles used:	Y N		
Sufficient volume sent:	Y N	Fedex	
RAD Screen <0.5 mR/hr:	Y N		

SPECIAL INSTRUCTIONS / COMMENTS:

Please include the LAB ID and the CLIENT SAMPLE ID on all final reports. Please e-mail results to lab@hallenvironmental.com. Please return all coolers and blue ice. Thank you.

Relinquished By: xc	Date: 6/22/2022	Time: 10:37 AM	Received By: Zac Porzi	Date: 6-23-22	Time: 0900
Relinquished By:	Date:	Time:	Received By:	Date:	Time:
Relinquished By:	Date:	Time:	Received By:	Date:	Time:

TAT: Standard ☑ RUSH Next BD ☐ 2nd BD ☐ 3rd BD ☐

REPORT TRANSMITTAL DESIRED:

☐ HARDCOPY (extra cost) ☐ FAX ☐ EMAIL ☐ ONLINE

FOR LAB USE ONLY

Temp of samples 2.0+0=2.0 °C Attempt to Cool ? _____

Comments: _____

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2206B51**

12-Jul-22

Client: AerSale, Inc

Project: MSGP Sampling

Sample ID: **MB-68433**	SampType: **MBLK**	TestCode: **EPA Method 200.7: Metals**
Client ID: **PBW**	Batch ID: **68433**	RunNo: **89144**
Prep Date: **6/29/2022**	Analysis Date: **6/29/2022**	SeqNo: **3167863** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	ND	0.020								
Zinc	ND	0.010								

Sample ID: **LCSLL-68433**	SampType: **LCSLL**	TestCode: **EPA Method 200.7: Metals**
Client ID: **BatchQC**	Batch ID: **68433**	RunNo: **89144**
Prep Date: **6/29/2022**	Analysis Date: **6/29/2022**	SeqNo: **3167867** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	ND	0.020	0.01000	0	128	50	150			
Zinc	0.011	0.010	0.01000	0	106	50	150			

Sample ID: **LCS-68433**	SampType: **LCS**	TestCode: **EPA Method 200.7: Metals**
Client ID: **LCSW**	Batch ID: **68433**	RunNo: **89144**
Prep Date: **6/29/2022**	Analysis Date: **6/29/2022**	SeqNo: **3167868** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	0.54	0.020	0.5000	0	108	85	115			
Zinc	0.47	0.010	0.5000	0	93.5	85	115			

Sample ID: **2206B51-001BMS**	SampType: **MS**	TestCode: **EPA Method 200.7: Metals**
Client ID: **Outfall 001**	Batch ID: **68433**	RunNo: **89144**
Prep Date: **6/29/2022**	Analysis Date: **6/29/2022**	SeqNo: **3167954** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Zinc	0.52	0.010	0.5000	0.09261	86.3	70	130			

Sample ID: **2206B51-001BMSD**	SampType: **MSD**	TestCode: **EPA Method 200.7: Metals**
Client ID: **Outfall 001**	Batch ID: **68433**	RunNo: **89144**
Prep Date: **6/29/2022**	Analysis Date: **6/29/2022**	SeqNo: **3167955** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Zinc	0.53	0.010	0.5000	0.09261	88.2	70	130	1.80	20	

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix interference
B	Analyte detected in the associated Method Blank
E	Estimated value
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2206B51**

12-Jul-22

Client: AerSale, Inc

Project: MSGP Sampling

Sample ID: **MB-68433**	SampType: **MBLK**	TestCode: **EPA 200.8: Metals**
Client ID: **PBW**	Batch ID: **68433**	RunNo: **89161**
Prep Date: **6/29/2022**	Analysis Date: **6/30/2022**	SeqNo: **3168850** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Copper	ND	0.0010								
Lead	ND	0.00050								

Sample ID: **MSLCSLL-68433**	SampType: **LCSLL**	TestCode: **EPA 200.8: Metals**
Client ID: **BatchQC**	Batch ID: **68433**	RunNo: **89161**
Prep Date: **6/29/2022**	Analysis Date: **6/30/2022**	SeqNo: **3168851** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Copper	0.0011	0.0010	0.001000	0	107	50	150			
Lead	ND	0.00050	0.0005000	0	99.2	50	150			

Sample ID: **MSLCS-68433**	SampType: **LCS**	TestCode: **EPA 200.8: Metals**
Client ID: **LCSW**	Batch ID: **68433**	RunNo: **89161**
Prep Date: **6/29/2022**	Analysis Date: **6/30/2022**	SeqNo: **3168852** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Copper	0.025	0.0010	0.02500	0	100	85	115			
Lead	0.012	0.00050	0.01250	0	96.6	85	115			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix interference
B	Analyte detected in the associated Method Blank
E	Estimated value
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2206B51**

12-Jul-22

Client: AerSale, Inc

Project: MSGP Sampling

Sample ID: **MB-68290**	SampType: **MBLK**	TestCode: **SM 2540D: TSS**							
Client ID: **PBW**	Batch ID: **68290**	RunNo: **88980**							
Prep Date: **6/22/2022**	Analysis Date: **6/23/2022**	SeqNo: **3160040**	Units: **mg/L**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Suspended Solids	ND	4.0								

Sample ID: **LCS-68290**	SampType: **LCS**	TestCode: **SM 2540D: TSS**							
Client ID: **LCSW**	Batch ID: **68290**	RunNo: **88980**							
Prep Date: **6/22/2022**	Analysis Date: **6/23/2022**	SeqNo: **3160041**	Units: **mg/L**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Suspended Solids	90	4.0	92.40	0	97.4	83.44	119.05			

Sample ID: **2206B51-001ADUP**	SampType: **DUP**	TestCode: **SM 2540D: TSS**							
Client ID: **Outfall 001**	Batch ID: **68290**	RunNo: **88980**							
Prep Date: **6/22/2022**	Analysis Date: **6/23/2022**	SeqNo: **3160063**	Units: **mg/L**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Suspended Solids	74	4.0						1.36	10	

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix interference
B	Analyte detected in the associated Method Blank
E	Estimated value
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: AerSale, Inc | Work Order Number: 2206B51 | RcptNo: 1

Received By: Juan Rojas 6/22/2022 8:58:00 AM

Completed By: Sean Livingston 6/22/2022 10:32:26 AM

Reviewed By: CMe 6/22/22

Chain of Custody

1. Is Chain of Custody complete?	Yes ☑	No ☐	Not Present ☐
2. How was the sample delivered?	FedEx		

Log In

3. Was an attempt made to cool the samples?	Yes ☑	No ☐	NA ☐
4. Were all samples received at a temperature of >0° C to 6.0°C	Yes ☑	No ☐	NA ☐
5. Sample(s) in proper container(s)?	Yes ☑	No ☐	
6. Sufficient sample volume for indicated test(s)?	Yes ☑	No ☐	
7. Are samples (except VOA and ONG) properly preserved?	Yes ☑	No ☐	
8. Was preservative added to bottles?	Yes ☐	No ☑	NA ☐
9. Received at least 1 vial with headspace <1/4" for AQ VOA?	Yes ☐	No ☐	NA ☑
10. Were any sample containers received broken?	Yes ☐	No ☑	
11. Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes ☑	No ☐	
12. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	
13. Is it clear what analyses were requested?	Yes ☑	No ☐	
14. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes ☑	No ☐	

# of preserved bottles checked for pH: 2
(<2 or >12 unless noted)
Adjusted? NO
Checked by: KPG 6.22.22

Special Handling (if applicable)

15. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☑

Person Notified: Date:
By Whom: Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person
Regarding:
Client Instructions:

16. Additional remarks:

17. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.5	Good				

Chain-of-Custody Record

Client: AERSALE

Mailing Address: 703 E CHALLENGER
ROSWELL, NM 88203

Phone #: 575-626-9836

email or Fax#: david.archibeque@aersale.com

QA/QC Package:
☐ Standard ☐ Level 4 (Full Validation)

Accreditation
☐ NELAP ☐ Other _____

☐ EDD (Type) _____

Turn-Around Time:
☐ Standard ☐ Rush _____

Project Name: MSGP SAMPLING

Project #: NMR05J01V

Project Manager: DAVID ARCHIBEQUE

Sampler:

On Ice: ☑ Yes ☐ No

Sample Temperature: 24+0.1=2.5

HALL ENVIRONMENTAL ANALYSIS LABORATORY
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No. 2206851	BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / MRO)	TPH (Method 418.1)	EDB (Method 504.1)	PAH's (8310 or 8270 SIMS)	RCRA 8 Metals	Anions (F,Cl,NO_3,NO_2,PO_4,SO_4)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	COD	TSS	Al, Cu, Pb, Zn		Air Bubbles (Y or N)
6/17/2022	8:00am		OUTFALL 001-COD	1/500 ml	H_2SO_4	001												X				
"	"		OF 001-TSS	1/500 ml	NONE														X			
"	"		OF001-Al, Pb, Co, Zn	1/250ml	HNO_3															X		

Date:	Time:	Relinquished by:	Received by:	Date	Time	Remarks:
6/17	8:30pm	David Archibeque	FedEx	6/22/22	8:58	
Date:	Time:	Relinquished by:	Received by:	Date	Time	

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: clients.hallenvironmental.com

July 15, 2021

David Archibeque

AerSale, Inc
703 E. Challenger St.
Roswell, NM 88203
TEL: (575) 624-3140
FAX

RE: Benchmark Sampling OrderNo.: 2106F10

Dear David Archibeque:

Hall Environmental Analysis Laboratory received 1 sample(s) on 6/29/2021 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0901

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

Analytical Report
Lab Order **2106F10**
Date Reported: **7/15/2021**

CLIENT: AerSale, Inc
Client Sample ID: Outfall 001
Project: Benchmark Sampling
Collection Date: 6/28/2021 1:30:00 PM
Lab ID: 2106F10-001
Matrix: AQUEOUS
Received Date: 6/29/2021 9:25:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA 200.8: METALS						Analyst: **bcv**	
Copper	0.0067	0.0010		mg/L	1	7/8/2021 12:34:29 PM	61135
Lead	0.0099	0.00050		mg/L	1	6/30/2021 4:52:13 PM	61019
SM 2540D: TSS						Analyst: **KS**	
Suspended Solids	160	4.0		mg/L	1	6/30/2021 7:14:00 PM	61038
EPA METHOD 200.7: METALS						Analyst: **ELS**	
Aluminum	5.6	0.20	*	mg/L	10	6/30/2021 11:04:40 AM	61019
Zinc	0.050	0.010		mg/L	1	6/30/2021 10:40:42 AM	61019

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
PQL	Practical Quanitative Limit	RL	Reporting Limit
S	% Recovery outside of range due to dilution or matrix		

ANALYTICAL REPORT

July 05, 2021

Hall Environmental Analysis Laboratory

Sample Delivery Group:	L1372904
Samples Received:	06/30/2021
Project Number:	
Description:	

Report To: Jackie Bolte
4901 Hawkins NE
Albuquerque, NM 87109

Entire Report Reviewed By:

John Hawkins
Project Manager

Pace Analytical National
12065 Lebanon Rd Mount Juliet, TN 37122 615-758-5858 800-767-5859 www.pacenational.com

TABLE OF CONTENTS

SAMPLE SUMMARY

2106F10-001C OUTFALL 001 L1372904-01 WW

	Collected by	Collected date/time	Received date/time
		06/28/21 13:30	06/30/21 09:00

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Wet Chemistry by Method 410.4	WG1698898	1	07/03/21 09:40	07/03/21 12:09	GJA	Mt. Juliet, TN

CASE NARRATIVE

All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

John Hawkins
Project Manager

Wet Chemistry by Method 410.4

Analyte	Result mg/l	Qualifier	RDL mg/l	Dilution	Analysis date / time	Batch
COD	51.5		20.0	1	07/03/2021 12:09	WG1698898

Method Blank (MB)

(MB) R3675302-1 07/03/21 12:03

Analyte	MB Result mg/l	MB Qualifier	MB MDL mg/l	MB RDL mg/l
COD	U		11.7	20.0

L1372582-01 Original Sample (OS) • Duplicate (DUP)

(OS) L1372582-01 07/03/21 12:03 • (DUP) R3675302-3 07/03/21 12:03

Analyte	Original Result mg/l	DUP Result mg/l	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
COD	98.3	99.2	1	0.953		20

L1372926-01 Original Sample (OS) • Duplicate (DUP)

(OS) L1372926-01 07/03/21 12:12 • (DUP) R3675302-6 07/03/21 12:12

Analyte	Original Result mg/l	DUP Result mg/l	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
COD	ND	ND	1	12.1		20

Laboratory Control Sample (LCS)

(LCS) R3675302-2 07/03/21 12:03

Analyte	Spike Amount mg/l	LCS Result mg/l	LCS Rec. %	Rec. Limits %	LCS Qualifier
COD	500	497	99.5	90.0-110	

L1372600-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1372600-01 07/03/21 12:04 • (MS) R3675302-4 07/03/21 12:05 • (MSD) R3675302-5 07/03/21 12:05

Analyte	Spike Amount mg/l	Original Result mg/l	MS Result mg/l	MSD Result mg/l	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
COD	500	32.5	552	556	104	105	1	80.0-120			0.745	20

GLOSSARY OF TERMS

Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Results Disclaimer - Information that may be provided by the customer, and contained within this report, include Permit Limits, Project Name, Sample ID, Sample Matrix, Sample Preservation, Field Blanks, Field Spikes, Field Duplicates, On-Site Data, Sampling Collection Dates/Times, and Sampling Location. Results relate to the accuracy of this information provided, and as the samples are received.

Abbreviations and Definitions

MDL	Method Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
RDL	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state “ND” (Not Detected) or “BDL” (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

Qualifier	Description

The remainder of this page intentionally left blank, there are no qualifiers applied to this SDG.

ACCREDITATIONS & LOCATIONS

Pace Analytical National 12065 Lebanon Rd Mount Juliet, TN 37122

Alabama	40660	Nebraska	NE-OS-15-05
Alaska	17-026	Nevada	TN000032021-1
Arizona	AZ0612	New Hampshire	2975
Arkansas	88-0469	New Jersey–NELAP	TN002
California	2932	New Mexico [1]	TN00003
Colorado	TN00003	New York	11742
Connecticut	PH-0197	North Carolina	Env375
Florida	E87487	North Carolina [1]	DW21704
Georgia	NELAP	North Carolina [3]	41
Georgia [1]	923	North Dakota	R-140
Idaho	TN00003	Ohio–VAP	CL0069
Illinois	200008	Oklahoma	9915
Indiana	C-TN-01	Oregon	TN200002
Iowa	364	Pennsylvania	68-02979
Kansas	E-10277	Rhode Island	LAO000356
Kentucky [1 6]	KY90010	South Carolina	84004002
Kentucky [2]	16	South Dakota	n/a
Louisiana	AI30792	Tennessee [1 4]	2006
Louisiana	LA018	Texas	T104704245-20-18
Maine	TN00003	Texas [5]	LAB0152
Maryland	324	Utah	TN000032021-11
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	110033
Minnesota	047-999-395	Washington	C847
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	998093910
Montana	CERT0086	Wyoming	A2LA
A2LA – ISO 17025	1461.01	AIHA-LAP,LLC EMLAP	100789
A2LA – ISO 17025 [5]	1461.02	DOD	1461.01
Canada	1461.01	USDA	P330-15-00234
EPA–Crypto	TN00003		

[1] Drinking Water [2] Underground Storage Tanks [3] Aquatic Toxicity [4] Chemical/Microbiological [5] Mold [6] Wastewater n/a Accreditation not applicable

* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace Analytical.

HALL ENVIRONMENTAL ANALYSIS LABORATORY

CHAIN OF CUSTODY RECORD

PAGE: 1 OF: 1

E181

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975
FAX: 505-345-4107
Website: clients.hallenvironmental.com

SUB CONTRATOR: **Pace TN**	COMPANY: **PACE TN**	PHONE: **(800) 767-5859**	FAX: **(615) 758-5859**
ADDRESS: **12065 Lebanon Rd**		ACCOUNT #:	EMAIL:
CITY, STATE, ZIP: **Mt. Juliet, TN 37122**			

LIJ72904

ITEM	SAMPLE	CLIENT SAMPLE ID	BOTTLE TYPE	MATRIX	COLLECTION DATE	# CONTAINERS	ANALYTICAL COMMENTS
1	2106F10-001C	Outfall 001	500HDPEH2SO4	Aqueous	6/28/2021 1:30:00 PM	1	COD

Sample Receipt Checklist

COC Seal Present/Intact:	Y N	If Applicable	
COC Signed/Accurate:	Y N	VOA Zero Headspace:	Y N
Bottles arrive intact:	Y N	Pres.Correct/Check:	Y N
Correct bottles used:	Y N		
Sufficient volume sent:	Y N		
RAD Screen <0.5 mR/hr:	Y N		

SPECIAL INSTRUCTIONS / COMMENTS:

Please include the LAB ID and the CLIENT SAMPLE ID on all final reports. Please e-mail results to lab@hallenvironmental.com. Please return all coolers and blue ice. Thank you.

Relinquished By:	Date: 6/29/2021	Time: 10:37 AM	Received By:	Date:	Time:
Relinquished By:	Date:	Time:	Received By:	Date:	Time:
Relinquished By:	Date:	Time:	Received By:	Date: 6/30/21	Time: 9:00

TAT: Standard ☒ RUSH Next BD ☐ 2nd BD ☐ 3rd BD ☐

REPORT TRANSMITTAL DESIRED:
☐ HARDCOPY (extra cost) ☐ FAX ☐ EMAIL ☐ ONLINE

FOR LAB USE ONLY
Temp of samples 4.6+2-4.8=4.2°C Attempt to Cool ? _____
Comments: _____

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2106F10**

15-Jul-21

Client: AerSale, Inc

Project: Benchmark Sampling

Sample ID: **MB-61019**	SampType: **MBLK**	TestCode: **EPA Method 200.7: Metals**
Client ID: **PBW**	Batch ID: **61019**	RunNo: **79474**
Prep Date: **6/29/2021**	Analysis Date: **6/30/2021**	SeqNo: **2793980** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	ND	0.020								
Zinc	ND	0.010								

Sample ID: **LLLCS-61019**	SampType: **LCSLL**	TestCode: **EPA Method 200.7: Metals**
Client ID: **BatchQC**	Batch ID: **61019**	RunNo: **79474**
Prep Date: **6/29/2021**	Analysis Date: **6/30/2021**	SeqNo: **2793981** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	ND	0.020	0.01000	0	101	50	150			
Zinc	0.011	0.010	0.01000	0	113	50	150			

Sample ID: **LCS-61019**	SampType: **LCS**	TestCode: **EPA Method 200.7: Metals**
Client ID: **LCSW**	Batch ID: **61019**	RunNo: **79474**
Prep Date: **6/29/2021**	Analysis Date: **6/30/2021**	SeqNo: **2793982** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Aluminum	0.56	0.020	0.5000	0	112	85	115			
Zinc	0.47	0.010	0.5000	0	94.6	85	115			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix
B	Analyte detected in the associated Method Blank
E	Value above quantitation range
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2106F10**

15-Jul-21

Client: AerSale, Inc

Project: Benchmark Sampling

Sample ID: **MB-61019** SampType: **MBLK** TestCode: **EPA 200.8: Metals**
Client ID: **PBW** Batch ID: **61019** RunNo: **79494**
Prep Date: **6/29/2021** Analysis Date: **6/30/2021** SeqNo: **2794776** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Lead	ND	0.00050								

Sample ID: **MSLLLCS-61019** SampType: **LCSLL** TestCode: **EPA 200.8: Metals**
Client ID: **BatchQC** Batch ID: **61019** RunNo: **79494**
Prep Date: **6/29/2021** Analysis Date: **6/30/2021** SeqNo: **2794777** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Lead	ND	0.00050	0.0005000	0	93.9	50	150			

Sample ID: **MSLCS-61019** SampType: **LCS** TestCode: **EPA 200.8: Metals**
Client ID: **LCSW** Batch ID: **61019** RunNo: **79494**
Prep Date: **6/29/2021** Analysis Date: **6/30/2021** SeqNo: **2794778** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Lead	0.012	0.00050	0.01250	0	95.7	85	115			

Sample ID: **2106F10-001BMSLL** SampType: **MS** TestCode: **EPA 200.8: Metals**
Client ID: **Outfall 001** Batch ID: **61019** RunNo: **79494**
Prep Date: **6/29/2021** Analysis Date: **6/30/2021** SeqNo: **2794850** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Lead	0.021	0.00050	0.01250	0.009855	91.4	70	130			

Sample ID: **2106F10-001BMSDL** SampType: **MSD** TestCode: **EPA 200.8: Metals**
Client ID: **Outfall 001** Batch ID: **61019** RunNo: **79494**
Prep Date: **6/29/2021** Analysis Date: **6/30/2021** SeqNo: **2794851** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Lead	0.021	0.00050	0.01250	0.009855	85.2	70	130	3.69	20	

Sample ID: **MB-61135** SampType: **MBLK** TestCode: **EPA 200.8: Metals**
Client ID: **PBW** Batch ID: **61135** RunNo: **79652**
Prep Date: **7/6/2021** Analysis Date: **7/8/2021** SeqNo: **2801285** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Copper	ND	0.0010								

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix
B	Analyte detected in the associated Method Blank
E	Value above quantitation range
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2106F10**

15-Jul-21

Client: AerSale, Inc

Project: Benchmark Sampling

Sample ID: **MSLLLCS-61135**	SampType: **LCSLL**	TestCode: **EPA 200.8: Metals**							
Client ID: **BatchQC**	Batch ID: **61135**	RunNo: **79652**							
Prep Date: **7/6/2021**	Analysis Date: **7/8/2021**	SeqNo: **2801286**	Units: **mg/L**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Copper	ND	0.0010	0.001000	0	99.2	50	150			

Sample ID: **MSLCS-61135**	SampType: **LCS**	TestCode: **EPA 200.8: Metals**							
Client ID: **LCSW**	Batch ID: **61135**	RunNo: **79652**							
Prep Date: **7/6/2021**	Analysis Date: **7/8/2021**	SeqNo: **2801287**	Units: **mg/L**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Copper	0.024	0.0010	0.02500	0	97.5	85	115			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix
B	Analyte detected in the associated Method Blank
E	Value above quantitation range
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2106F10**

15-Jul-21

Client: AerSale, Inc

Project: Benchmark Sampling

Sample ID: **MB-61038**	SampType: **MBLK**	TestCode: **SM 2540D: TSS**
Client ID: **PBW**	Batch ID: **61038**	RunNo: **79489**
Prep Date: **6/30/2021**	Analysis Date: **6/30/2021**	SeqNo: **2794362** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Suspended Solids	ND	4.0								

Sample ID: **LCS-61038**	SampType: **LCS**	TestCode: **SM 2540D: TSS**
Client ID: **LCSW**	Batch ID: **61038**	RunNo: **79489**
Prep Date: **6/30/2021**	Analysis Date: **6/30/2021**	SeqNo: **2794363** Units: **mg/L**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Suspended Solids	97	4.0	92.10	0	105	83.71	119.44			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix
B	Analyte detected in the associated Method Blank
E	Value above quantitation range
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: clients.hallenvironmental.com

Sample Log-In Check List

Client Name: **AerSale, Inc** Work Order Number: **2106F10** RcptNo: 1

Received By: **Desiree Dominguez** **6/29/2021 9:25:00 AM** DD

Completed By: **Cheyenne Cason** **6/29/2021 10:35:04 AM** CM

Reviewed By: JR 6/29/21

Chain of Custody

1. Is Chain of Custody complete?	Yes ☑	No ☐	Not Present ☐
2. How was the sample delivered?	FedEx		

Log In

3. Was an attempt made to cool the samples?	Yes ☑	No ☐	NA ☐
4. Were all samples received at a temperature of >0° C to 6.0°C	Yes ☑	No ☐	NA ☐
5. Sample(s) in proper container(s)?	Yes ☑	No ☐	
6. Sufficient sample volume for indicated test(s)?	Yes ☑	No ☐	
7. Are samples (except VOA and ONG) properly preserved?	Yes ☑	No ☐	
8. Was preservative added to bottles?	Yes ☐	No ☑	NA ☐
9. Received at least 1 vial with headspace <1/4" for AQ VOA?	Yes ☐	No ☐	NA ☑
10. Were any sample containers received broken?	Yes ☐	No ☑	
11. Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes ☑	No ☐	
12. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	
13. Is it clear what analyses were requested?	Yes ☑	No ☐	
14. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes ☑	No ☐	

# of preserved bottles checked for pH: 2 (<2 or >12 unless noted)

Adjusted? NO

Checked by: T.C. 6.29.21

Special Handling (if applicable)

15. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☑

Person Notified: _____ Date: _____

By Whom: _____ Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

16. Additional remarks:

17. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	0.1	Good				

Chain-of-Custody Record

Client: AERSALE, INC

DAVID ARCHIBEQUE

Mailing Address: 703 E. CHALLENGER

ROSWELL, NM 88203

Phone #: 575-626-9836

email or Fax#: david.archibeque@aersale.com

QA/QC Package:

☐ Standard ☐ Level 4 (Full Validation)

Accreditation: ☐ Az Compliance

☐ NELAC ☐ Other

☐ EDD (Type)

Turn-Around Time:

☑ Standard ☐ Rush

Project Name: BENCHMARK SAMPLING

Project #: NMR05J01Y

Project Manager: DAVID ARCHIBEQUE

Sampler:

On Ice: ☒ Yes ☐ No

# of Coolers: 1

Cooler Temp(including CF): 0.2-0.1=0.1 (°C)

HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

2021 Date	Time	Matrix	Sample Name	Container Type and #	Preservative Type	HEAL No. 2106E10	BTEX / MTBE / TMB's (8021)	TPH:8015D(GRO / DRO / MRO)	8081 Pesticides/8082 PCB's	EDB (Method 504.1)	PAHs by 8310 or 8270SIMS	RCRA 8 Metals	Cl, F, Br, NO_3, NO_2, PO_4, SO_4	8260 (VOA)	8270 (Semi-VOA)	Total Coliform (Present/Absent)	COD	TSS	Al, Pb, Cu, Zn METALS
* 6/28	1330	H2O	OUTFALL 001	1/1500ml	H2SO4	001											X		
"	"	"	"	1/1500ml	NONE													X	
"	"	"	"	1/250ml	HNO3														X

Date:	Time:	Relinquished by:	Received by:	Via:	Date	Time
6/28	13:30	David Archibeque		Fed Ex	6-29-21	9:25
Date:	Time:	Relinquished by:	Received by:	Via:	Date	Time

Remarks:

* For Bottles one Glass1

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

ATTACHMENT E

MAINTENANCE RECORDS

AERSALE-ROSWELL - MAINTENANCE RECORD

CONTROL MEASURE:	Secondary Containment in Fuel Storage Area		**PPS**	**5**
Regular Maintenance Activities:	1. Clean containment area	2. Repair cracked walls & floors		
3. Other:				
Regular Maintenance Schedule:	Action Date:	Action Reason:		
Every three months		☐ Regular Maintenance	☐ Problem Discovered	
If problem, describe action required:				
Control fully functioning within 14 calendar days?	☐ Yes	☐ No	Date Completed:	
If cannot complete repairs within 14 calendar days, explain why not and provide schedule for completion no longer than 45 days				
from date found:				
Control fully functioning within 45 calendar days?	☐ Yes	☐ No	Date Completed:	
45-Day Extension - provide rationale sent to USEPA for extension of 45-day timeframe:				
Corrective Action Completed?	☐ Yes	☐ No	Date Completed:	

CONTROL MEASURE:	Waste Material Storage Containment		**PPS**	**9**
Regular Maintenance Activities:	1. Check that all containers labeled	2. Repair cracked walls, floors, and roofs		
3. Other:				
Regular Maintenance Schedule:	Action Date:	Action Reason:		
Every three months		☐ Regular Maintenance	☐ Problem Discovered	
If problem, describe action required:				
Control fully functioning within 14 calendar days?	☐ Yes	☐ No	Date Completed:	
If cannot complete repairs within 14 calendar days, explain why not and provide schedule for completion no longer than 45 days				
from date found:				
Control fully functioning within 45 calendar days?	☐ Yes	☐ No	Date Completed:	
45-Day Extension - provide rationale sent to USEPA for extension of 45-day timeframe:				
Control fully functioning?	☐ Yes	☐ No	Date Completed:	

CONTROL MEASURE:	Clean Storm Drains		**PPS**	**19**
Regular Maintenance Activities:	1. Clean out storm drains	2. Other:		
Regular Maintenance Schedule:	Action Date:	Action Reason:		
Every six months		☐ Regular Maintenance	☐ Problem Discovered	

I certify under penalty of law that his document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print name and title: _____

Signature: _____ Date: _____

ATTACHMENT F

LIST OF REPORTABLE MATERIALS AND REPORTABLE QUANTITIES

List Contained in Environmental Protection Agency TABLE 302.4—LIST OF HAZARDOUS SUBSTANCES AND REPORTABLE QUANTITIES

https://www.gpo.gov/fdsys/pkg/CFR-2004-title40-vol26/pdf/CFR-2004-title40-vol26-sec302-4.pdf

ATTACHMENT G

EMPLOYEE TRAINING LOGS

AERSALE-ROSWELL - TRAINING LOG

AerSale-Roswell must train all employees who (1) work in areas where industrial materials or activities are exposed to stormwater, or (2) are responsible for taking actions to meet the conditions of the SWPPP (e.g., maintenance personnel and Inspectors), and (3) are members of the Stormwater Pollution Prevention Team.

AerSale-Roswell must ensure the following personnel understand the requirements of the SWPPP and their specific responsibilities respect to those requirements.

- Personnel responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures);
- Personnel responsible for storage and handling of chemicals and materials that could become contaminants in stormwater discharges;
- Personnel responsible for conducting and documenting inspections; and
- Personnel responsible for taking and documenting corrective actions

Training Date:	Training Description:	
☐	Overview of what is in the SWPPP	
☐	Spill response procedures, good housekeeping, maintenance requirements, and material management practices	
☐	Location of all permit-required controls and how such controls are to be maintained	
☐	Proper procedures to follow with respect to the permit's pollution prevention requirements	
☐	When and how to conduct inspections, record applicable findings, and take corrective actions	
Trainer(s) Names:	Trained Employee(s) Names:	Trained Employee(s) Signatures:

Training Date:	Training Description:	
☐	Overview of what is in the SWPPP	
☐	Spill response procedures, good housekeeping, maintenance requirements, and material management practices	
☐	Location of all permit-required controls and how such controls are to be maintained	
☐	Proper procedures to follow with respect to the permit's pollution prevention requirements	
☐	When and how to conduct inspections, record applicable findings, and take corrective actions	
Trainer(s) Names:	Trained Employee(s) Names:	Trained Employee(s) Signatures:

ATTACHMENT H

ROUTINE INSPECTION REPORTS, SPOT INSPECTION REPORTS, AND CREDENTIALS OF QUALIFIED INSPECTORS

AERSALE-ROSWELL - ROUTINE QUARTERLY INSPECTION REPORT

PREVIOUS ISSUES		
Any previously unidentified pollutant discharges since the last inspection?	☐ Yes	☐ No
If yes, describe:		
Any discharges occurring at time of inspection?	☐ Yes	☐ No
If yes, describe:		
Describe other previous issues, if any:		

INSPECTION INFORMATION			
Inspection Date(s):	Start time:	End time:	Comments:

WEATHER INFORMATION							
Weather at Time of Inspection:	☐	Clear	☐	Cloudy	☐	Rain	☐ Sleet
☐ Fog	☐	Snow	☐	High Winds	☐	Other:	
Temperature:		Last Rain Event:	☐	w/in 24 hrs	☐	24-72 hrs	☐ 72+ hrs

INSPECTION DURING STORMWATER DISCHARGE - REQUIRED AT LEAST ONCE PER YEAR				
Date Rainfall Started:	No. Hrs Rainfall Lasted:	Total Inches Rain:	Date Last Rain w/ Discharge:	# Days Since Last Rain w/Disch:

CONTROL MEASURES

PPS #	**Potential Pollutant Source**				
1	**Aircraft and vehicle fueling and aircraft de-fueling**	**Yes**	**No**	**N/A**	**Addressed**
CM 1	Fueling operations (incl. tank trucks) conducted on impervious pad?	☐	☐	☐	☐
CM 2	Drip pans used where fuel leaks or spills can occur & where making or breaking hose connections?	☐	☐	☐	☐
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐

PPS #	**Potential Pollutant Source**				
2	**Ground vehicle and equipment maintenance**	**Yes**	**No**	**N/A**	**Addressed**
CM 2	Drip pans used where fuel leaks or spills can occur & where making or breaking hose connections?	☐	☐	☐	☐
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	☐	☐	☐	☐
CM 18	Good-condition Industrial Storm Wattle around aircraft or storm drain that catches all stormwater from area?	☐	☐	☐	☐

PPS #	**Potential Pollutant Source**				
3	**Aircraft reusable parts' & fluids' removal**	**Yes**	**No**	**N/A**	**Addressed**
CM 2	Drip pans used where fuel leaks or spills can occur & where making or breaking hose connections?	☐	☐	☐	☐
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐
CM 6	Absorbent pads or other absorbent material under engines?	☐	☐	☐	☐
CM 13	Fluids collected immediately & stored in closed containers in Waste Materials' storage areas or in fuel-recycling areas for resale?	☐	☐	☐	☐

CM 17	All containers in good condition & clearly and accurately labled?	☐	☐	☐	☐
CM 18	Good-condition Industrial Storm Wattle around aircraft or storm drain that catches all stormwater from area?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
5	**Fuel storage**	**Yes**	**No**	**N/A**	**Addressed**
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	☐	☐	☐	☐
CM 8	Stored in designated fueling areas on impervious surfaces with secondary containment or stored on vehicles?	☐	☐	☐	☐
CM 17	All containers in good condition & clearly and accurately labled?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
6	**Loading/Unloading**	**Yes**	**No**	**N/A**	**Addressed**
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
7	**Aircraft maintenance**	**Yes**	**No**	**N/A**	**Addressed**
CM 2	Drip pans used where fuel leaks or spills can occur & where making or breaking hose connections?	☐	☐	☐	☐
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	☐	☐	☐	☐
CM 18	Good-condition Industrial Storm Wattle around aircraft or storm drain that catches all stormwater from area?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
8	**Aircraft parking**	**Yes**	**No**	**N/A**	**Addressed**
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐
CM 6	Absorbent pads or other absorbent material under engines?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
9	**Waste materials' storage**	**Yes**	**No**	**N/A**	**Addressed**
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐
CM 9	Stored on impervious surface in closed containers, totally enclosed sheds, or covered lean-tos, all protected from rainfall and snowfall?	☐	☐	☐	☐
CM 17	All containers in good condition & clearly and accurately labled?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
10	**Non-fuel unused materials' storage**	**Yes**	**No**	**N/A**	**Addressed**
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	☐	☐	☐	☐
CM 17	All containers in good condition & clearly and accurately labled?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
11	**Ground vehicle cleaning**	**Yes**	**No**	**N/A**	**Addressed**
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
12	**Employee/vendor parking**	**Yes**	**No**	**N/A**	**Addressed**
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
13	**Equipment storage**	**Yes**	**No**	**N/A**	**Addressed**
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	☐	☐	☐	☐
CM 11	Drained of all fluids prior to storage?	☐	☐	☐	☐
CM 12	If outdoors, stored covered & on pallets or enclosed in plastic?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
14	**Contaminated snowmelt**	**Yes**	**No**	**N/A**	**Addressed**
CM 13	Fluid collected immediately by absorbent materials or other means & stored in closed containers in Waste Materials' storage areas?	☐	☐	☐	☐
CM 17	Containers in good condition & clearly & accurately labeled?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
17	**Aircraft, ground vehicle, and equipment awaiting maintenance**	**Yes**	**No**	**N/A**	**Addressed**
CM 3	Spill kits or absorbent materials kept nearby?	☐	☐	☐	☐
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	☐	☐	☐	☐
CM 6	Absorbent pads or other absorbent material under engines?	☐	☐	☐	☐
CM 14	Activity in designated, impervious area only?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
18	**Painting**	**Yes**	**No**	**N/A**	**Addressed**
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
19	**AerSale-wide activities: floatable debris, dumpsters, storm drains**	**Yes**	**No**	**N/A**	**Addressed**
CM 4	Spills/leaks cleaned up immediately using dry methods?	☐	☐	☐	☐
CM 15	Floatable debris removed to dumpsters? Storm drains cleaned out every 6 months? Date last cleaned out storm drains:	☐	☐	☐	☐

PPS #	Potential Pollutant Source				
20	**AerSale Outfall 001**	**Yes**	**No**	**N/A**	**Addressed**
CM 20	Channel or streambank erosion or scour occuring?	☐	☐	☐	☐

DISCHARGE POINTS

Describe any evidence of, or the potential for, pollutants entering storm water drains. Describe observations regarding the physical condition of and around Outfall 001 & evidence of pollutants in discharges entering Outfall 001. Identify any corrective action needed.

NON-COMPLIANCE

Describe and give a unique location of any incidents of non-compliance observed (i.e., where "No" or "Addressed" has been marked). If multiple incidents with the same PPS # /CM #, identify each with letters "A", "B", "C", etc.

PPS #	CM #	Letter (if reqd)	Description/Unique Location of Non-compliant Incident

ADDITIONAL CONTROL MEASURES

Describe any additional control measures needed to comply with the permit requirements.

PPS #	CM #	Letter (if reqd)	

ADDITIONAL NOTES AND OBSERVATIONS

CERTIFICATION STATEMENT

I certify under penalty of law that his document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print name and title: _____

Signature: _____ Date: _____

ATTACHMENT I

QUARTERLY VISUAL INSPECTION REPORTS

AERSALE-ROSWELL - QUARTERLY VISUAL INSPECTION REPORT

Outfall	Outfall 001			
Monitoring Period (circle):*	Jan. 1 - Mar. 31	April 1 - June 30	July 1 - Sept. 30	Oct. 1 - Dec. 31

* If cannot collect sample during any one of these periods, explain why; e.g., no rain or snow; dangerous conditions such as high winds, electrical storms, flooding, extended frozen conditions; or other. If dangerous weather conditions, describe conditions:

[Must collect >=4 samples/yr when storm event >= 0.1 inch rain occurs and rainfall results in discharge. If snow, at least one sample must capture snowmelt discharge.]

Person(s) Collecting Sample:		Discharge Began:		Sample Collected:**		Sample Examined:	
Printed Name	Signature:	Date	Time	Date	Time	Date	Time

Nature of Discharge: ☐ Snowmelt ☐ Rain**

** If rain sample not collected within 30 minutes after discharge began, explain why:

If discharge from rain:	Rain Date:	No. Hrs. Rain Duration	No. Inches Rain:	No. Days Since Last Rain Discharge:

POLLUTANTS OBSERVED

Color:	☐ None	☐ Other (Describe):							
Odor:	☐ None	☐ Musty	☐ Sewage	☐ Sulfur	☐ Sour	☐ Petroleum/Gas	☐ Solvents	☐ Other (Describe):	
Clarity:	☐ Clear	☐ Sightly Cloudy	☐ Cloudy	☐ Opaque	☐ Other				
Floating Solids:	☐ No	☐ Yes (Describe):							
Settled Solids:	☐ No	☐ Yes (Describe):							
Suspended Solids:	☐ No	☐ Yes (Describe):							
Foam:	☐ No	☐ Yes (Describe):							
Oil Sheen:	☐ None	☐ Flecks	☐ Globs	☐ Sheen	☐ Slick	☐ Other (Describe):			
Other Obvious Stormwater Pollution Indicators:	☐ No	☐ Yes (Describe):							

PROBABLE SOURCES OF STORMWATER CONTAMINATION

NECESSARY CORRECTIVE ACTIONS

COMMENTS

CERTIFICATION STATEMENT

I certify under penalty of law that his document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print name and title: _____

Signature: _____ Date Signed: _____

ATTACHMENT J

CORRECTIVE ACTION REPORTS, IMMEDIATE AND SUBSEQUENT

AERSALE-ROSWELL - CORRECTIVE ACTION REPORT

CONDITION TRIGGERING NEED FOR CORRECTIVE ACTION				
Description of Condition:				Date Found:
Spills and Leaks Only				
Describe Incident:	Describe Material:	Amount:	Location:	
Reason for Spill/Leak:			Date Started:	Time Started:
Discharge to Outfall? ☐ Yes	☐ No			

Immediate **Actions Taken:**

Immediate action must begin on the same day the condition is found, or, if too late on that day , on the following work day. All reasonable steps must be taken to prevent or at least minimize the pollutants' discharge until a permanent solution is in place. If no action is needed, explain why.

Corrective Action Completed? ☐ Yes ☐ No Date Completed:

Actions Taken Within 14 Days:

If additional corrective actions needed, complete actions before next storm event, if possible, and within 14 calendar days from date found.

Corrective Action Completed? ☐ Yes ☐ No Date Completed:

Actions Taken Within 45 Days:

If cannot complete Corrective Action within 14 calendar days, explain why not and provide schedule for completion no longer than 45 days from date found:

Corrective Action Completed? ☐ Yes ☐ No Date Completed:

45-Day Extension - provide rationale sent to USEPA for extension of 45-day timeframe:

Corrective Action Completed? ☐ Yes ☐ No Date Completed:

I certify under penalty of law that his document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print name and title: _____

Signature: _____ Date: _____

ATTACHMENT K

SWPPP REVISIONS

ATTACHMENT L

DOCUMENTS SUPPORTING CRITERIA FOR ENDANGERED AND THREATENED SPECIES AND HISTORIC PROPERTIES PRESERVATION (4/26/2021 NOI AND ATTACHMENTS)

NPDES FORM 3510-6	EPA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 NOTICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	FORM Approved OMB No. 2040-0004

Permit Information

Master Permit Number: NMR050000

NPDES ID: NMR05J01V

Eligibility Information

State/territory where your facility is discharging: NM

Does your facility discharge to federally recognized Indian Country lands? No

Are you a *"Federal Operator"* as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?

No

Which type of form would you like to submit? Notice of Intent (NOI)

By indicating "Yes" below, I confirm that I understand that the MSGP only authorizes the stormwater discharges in Part 1.1.2 and the allowable non-stormwater discharges listed in Part 1.2.2. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.2.1. and 1.2.2. will be discharged, they must be covered under another NPDES permit.

Yes

Are you a new discharger or a new source as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?

No

- **Have stormwater discharges from your facility been covered previously under an NPDES permit?** Yes
  - **If yes, provide your most current NPDES ID (i.e., permit tracking number) if you had coverage under EPA's MSGP or the NPDES permit number if you had coverage under an EPA individual permit:**

    NMR05J01V
- **Are you discharging to any waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 3 water (Outstanding National Resource water)? (See Appendix L (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_l_-_list_of_tier_3_tier_2_and_tier_2.5_waters.pdf))**

  No

Do you anticipate the discharge of groundwater or spring water from your facility? No

What is the legal name of the Operator as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?

AerSale Inc.

What is the name of your facility or activity as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?

AerSale Inc., Roswell, NM Facility

Operator Information

Operator Information

Operator Name: AerSale Inc.

Operator Mailing Address

Address Line 1: 703 E. Challenger St.

Address Line 2:

City: Roswell

ZIP/Postal Code: 88203

State: NM

County or Similar Division: Chaves

Operator Point of Contact Information

First Name Middle Initial Last Name: Randy Phelps

Title: General Manager

Phone: 575-624-3140 **Ext.:** 3316

Email: randy.phelps@aersale.com

NOI Preparer Information

☑ **This NOI is being prepared by someone other than the certifier.**

First Name Middle Initial Last Name: Mary F Barron

Organization: Barron's Environmental Solutions - In Time!, Inc.

Phone: 575-622-7224 **Ext.:**

Email: mary@barronsenvironmental.com

Facility Information

Facility Information

Facility Name: AerSale Inc., Roswell, NM Facility

Facility Address

Address Line 1: 703 E. Challenger St.

Address Line 2:

City: Roswell

ZIP/Postal Code: 88203

State: NM

County or Similar Division: Chaves

Latitude/Longitude for the Facility

Latitude/Longitude: 33.3139°N, 104.5129°W

Latitude/Longitude Data Source: Map

Horizontal Reference Datum: NAD 83

General Facility Information

What is the ownership type of the facility? Municipality

Estimated area of industrial activity at your facility exposed to stormwater (rounded to the nearest quarter acre): 38

Is your facility presently inactive and unstaffed? No

Exception for Inactive and Unstaffed Facilities: The requirement for indicator monitoring, impaired waters monitoring, and/or benchmark monitoring does not apply at a facility that is inactive and unstaffed, as long as there are no industrial materials or activities exposed to stormwater.

If circumstances change during the permit term that affect your qualifications for this exception to monitoring requirements (i.e. industrial materials or activities exposure to stormwater or your facility's active/inactive and staffed/unstaffed status) you must submit a NOI notifying EPA of the change in circumstances.

Sector-Specific Information

Primary Sector: S **Primary Subsector:** S1

Primary SIC Code: 4581

Co-Located Sectors:

Co-Located Sector: N **Co-Located Subsector:** N1 **Co-Located SIC Code:** 5093

If you are a Sector S (Air Transportation) facility, do you anticipate using more than 100,000 gallons of pure glycol in glycol-based deicing fluids and/or 100 tons or more of urea on an average annual basis?

No

Discharge Information

By indicating "Yes" below, I confirm that I understand that the MSGP only authorizes the stormwater discharges in Part 1.2.1 and the allowable non-stormwater discharges listed in Part 1.2.2. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the authorized stormwater and non-stormwater discharges listed in Parts 1.2.1 and 1.2.2 will be discharged, they must be covered under another NPDES permit.

Yes

Federal Effluent Limitation Guidelines

Identify the Effluent Limitation Guideline(s) that apply to your stormwater discharges.

40 CFR Part/Subpart	Eligible Discharges	Affected MSGP Sector	New Source Date	Applicability
Part 449	Existing and new primary airports with1,000 or more annual jet departures that discharge wastewater associated with airfield pavement deicing that contains urea commingled with stormwater	S	06/15/2012	**Does your facility have any discharges subject to this effluent limitation guideline?** No

Are you requesting permit coverage for any stormwater discharges subject to effluent limitation guidelines? No

Other Discharge Information

Do you anticipate the discharge of groundwater or spring water from your facility? No

Does your facility discharge into a Municipal Separate Sewer System (MS4)? No

Receiving Waters Information

List all of the stormwater discharge points from your facility.

Discharge Point 001: Outfall 001

Applicable Sectors

Select the Sectors/Subsector(s) that apply to this discharge point.

	Sector	Subsector	SIC/Activity Code
☑	**S** - AIR TRANSPORTATION FACILITIES	**S1** - Air Transportation Facilities	4581
☑	**N** - SCRAP RECYCLING FACILITIES	**N1** - Scrap Recycling and Waste Recycling Facilities except Source-Separated	5093

Latitude/Longitude: 33.3127°N, 104.5101°W

☐ **This discharge point is *Substantially Identical* to an existing discharge point.**

Receiving Water

GNIS Name:
n/a

Waterbody Name:
Hagerman Canal then Pecos River

Listed Water ID:
n/a

Is this receiving water saltwater or freshwater? Freshwater

Is this receiving water designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water)?

No

Will you have stormwater discharges from paved surfaces that will be initially sealed or re-sealed with coal-tar sealcoat where industrial activities are located during coverage under this permit?

No

Benchmark Monitoring

Are you subject to benchmark monitoring requirements for a hardness-dependent metal? Yes

➔ **What is the hardness of your receiving water(s)?** 1881.79

(mg/L)

Impaired Waters Monitoring

Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? No

Has a TMDL been completed for this receiving waterbody? No

SWPPP Information

Has the SWPPP been prepared in advance of filing this NOI, as required? Yes

SWPPP Contact Information:

First Name Middle Initial Last Name: Randy Phelps

Phone: 575-624-3140 **Ext.:** 3316

Email: randy.phelps@aersale.com

SWPPP Availability:

Your current SWPPP or certain information from your SWPPP must be made available through one of the following three options. Select one of the options and provide the required information.

Note: you are not required to post any confidential business information (CBI) or restricted information (as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)) (such information may be redacted), but you must clearly identify those portions of the SWPPP that are being withheld from public access.

☐ **Option 1: Attach a current copy of your SWPPP to this NOI.**

☑ **Option 2: Maintain a Current Copy of your SWPPP on an Internet page (Universal Resource Locator or URL).**

Provide the web address URL (e.g. http://www.example.com):

https://info.aersale.com/hubfs/Production/Quality%20Certificates/AerSale%20SWPPP%200708.pdf?t=1540457328057

☐ **Option 3: Provide the following information from your SWPPP:**

Endangered Species Protection Worksheet: Criterion C1

The following questions will help you determine your eligibility under Part 1.1.4 of the permit with respect to protection of Endangered Species Act (ESA) species and critical habitat(s). Please refer to Appendix E (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_e_-_procedures_relating_to_endangered_species_protection.pdf) of the 2021 MSGP for important information regarding your obligations under this permit concerning ESA-protected species and critical habitat(s).

Determine ESA Eligibility Criterion

Are your industrial activities already addressed in another operator's valid certification of eligibility for your "action area" under eligibility criteria A, C, D, or E of the 2021 MSGP?

No

Are your industrial activities the subject of a permit under section 10 of the ESA by the USFWS and/or NMFS, and this authorization addresses the effects of your facility's discharges and discharge-related activities on ESA-listed species and critical habitat?

No

You must determine whether species listed as either threatened or endangered under the Endangered Species Act, and/or their critical habitat are located in your facility's action area. ESA-listed species and critical habitat are under the purview of the NMFS and the USFWS.

Determine Your Action Area

Your "action area" (as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)) includes all areas to be affected directly or indirectly by the action and not merely the immediate area involved in the action, including areas beyond the footprint of the facility that are likely to be affected by stormwater discharges, discharge-related activities, and authorized non-stormwater discharges. You must select and confirm that all the following are true:

In determining my "action area", I have considered that discharges of pollutants into downstream areas can expand the action area well beyond the footprint of my facility and the discharge point(s). I have taken into account the controls I will be implementing to minimize pollutants and the receiving waterbody characteristics (e.g. perennial, intermittent, ephemeral) in determining the extent of physical, chemical, and/or biotic effects of the discharges. I confirm that all receiving waterbodies that could receive pollutants from my facility are included in my action area.

True

In determining my "action area", I have considered that discharge-related activities must also be accounted for in determining my action area. I understand that discharge-related activities are any activities that cause, contribute to, or result in stormwater and authorized non-stormwater point source discharges, and measures such as the siting, construction, and operation of stormwater controls to control, reduce, or prevent pollutants from being discharged. I understand that any new or modified stormwater controls that will have noise or other similar effects, and any disturbances associated with construction of controls, are part of my action area.

True

Provide a written description of your action area and explain your rationale for the extent of the action area drawn on your map. Click here for an example.

The action area for the AerSale-Roswell facility's stormwater discharges extends downstream from Outfall 001 is 0.0 miles because the nearest receiving waterbody is the Hagerman Canal, a distance of about 7.45 miles from Outfall 001 in the direction of the east-northeast surface water flow. The Hagerman Canal can be discharged into the Pecos River to avoid overflow. As shown on the attached Google earth aerial dated October 4, 2014 and on the topographic map, Figure 1, between the action area and the Hagerman Canal are numerous impediments to flow from the action area actually reaching Hagerman Canal: bar ditches, cultivated farm land, residences, etc. The downstream limit of the action area reflects the approximate distance at which the discharge waters and any pollutants would be expected to cause potential adverse effects to listed species and/or critical habitat because of (a) the distance from the action area to the receiving waterbody as well as impediments to flow to the waterbody, and (b) the facility has been in constant use since the early 1940s (it was originally part of the military Walker Air Force Base) and no listed land species would be expected to still be present.
The species of concern are aquatic species in the Pecos River, into which the Hagerman Canal can be discharged.

Attach a map of the action area for your facility. Mapping tool IPaC (the Information, Planning, and Consultation System) located at http://ecos.fws.gov/ipac/ (https://ecos.fws.gov/ipac/) or click here (/net-msgp/documents/action_area_example.pdf) for an example.

Name	Uploaded Date	Size
AerSale ActionArea Maps.pdf (attachment/706863)	04/20/2021	681.20 KB

Determine if ESA-listed species and/or critical habitat are in your facility's action area.

ESA-listed species and critical habitat are under the purview of the NMFS and the USFWS, and in many cases, you will need to acquire species and critical habitat lists from both federal agencies.

National Marine Fisheries Service (NMFS)

To obtain NMFS-listed species and critical habitat information, use the resources listed below:

General Resources:

- NOAA Fisheries, Regions Page (https://www.fisheries.noaa.gov/regions)

For the Northeastern U.S.:

- NOAA Fisheries Greater Atlantic Region ESA Section 7 Mapper (https://noaa.maps.arcgis.com/apps/webappviewer/index.html?id=1bc332edc5204e03b250ac11f9914a27)

For Puerto Rico:

- *Acropora* critical habitat map (https://www.fisheries.noaa.gov/resource/map/acropora-elkhorn-and-staghorn-coral-critical-habitat-map-and-gis-data)
- Green turtle critical habitat map (https://www.fisheries.noaa.gov/resource/map/green-turtle-critical-habitat-map-and-gis-data)
- Hawksbill Turtle critical habitat map (https://www.fisheries.noaa.gov/resource/map/hawksbill-turtle-critical-habitat-map-and-gis-data)

Western U.S.:

- West Coast Region Protected Resources App (https://www.webapps.nwfsc.noaa.gov/portal/apps/webappviewer/index.html?id=7514c715b8594944a6e468dd25aaacc9)

Pacific Islands:

- Contact the Pacific Islands Regional Office at (808) 725-5000 or pirohonolulu@noaa.gov (mailto:pirohonolulu@noaa.gov)

I have checked the webpages listed above and confirmed that: There are no NMFS-listed species and/or critical habitat in my action area.

U.S. Fish and Wildlife Service (USFWS)

To obtain FWS-listed species and critical habitat information, use the resources listed below:

- IPaC (the Information, Planning, and Consultation System) (https://ecos.fws.gov/ipac/)
- For instructions for using IPaC, click here.

I have checked the webpages listed above and confirmed that: There are FWS-listed species and/or critical habitat in my action area.

For FWS species, include the full printout from your IPaC query/Official Species List.

Name	Uploaded Date	Size
AerSale Species List_ New Mexico Ecological Services Field Office.pdf (attachment/706864)	04/20/2021	540.41 KB

You may be eligible under **Criterion C.** You must assess whether your discharges and discharge-related activities are likely to adversely affect ESA-listed species or critical habitat, and whether any additional measures are necessary to ensure no likely adverse effects. In order to make a determination of your facility's likelihood of adverse effects, you must complete the Criterion C Eligibility fields below.

Criterion C Eligibility

Select which applies:

Criterion C1: Facility eligible for Criterion C in the 2015 MSGP with no change to ESA-listed species, critical habitat, or action area.

Your facility was eligible for Criterion C in the 2015 MSGP and there has been no change in your facility's action area and you have confirmed that there are no additional ESA-listed species or critical habitat under the jurisdiction of USFWS and/or NMFS in your action area since your certification under Criterion C in the 2015 MSGP. You must provide a description of the basis of this criterion selected on your NOI form and provide documentation supporting your eligibility determination in your SWPPP.

Select which applies:

I am seeking coverage under the MSGP as an existing discharger and there are no modifications to my facility.

Provide a basis statement providing the USFWS and/or NMFS resources consulted that helped you determine that there are no additional ESA-listed species and/or critical habitat have been listed by under the jurisdiction of the Services in your action area.

From the updated USFWS species list attached: Birds: The Least Tern, Sterna antillarum ,
has been deleted from the current list and no birds have been added. Fishes: none have been added. Snails: none have been added. Crustaceans: none have been added. Flowering Plants: none have been added. Per USFWS, "There are no critical habitats within your project area under this office's jurisdiction"

Note: Any missing or incomplete information in this section may result in a delay of your coverage under the permit.

Historic Preservation: Criterion A

The following questions will help you determine your eligibility under Part 1.1.5 of the permit with respect to preservation of historic properties. You may still use the paper instructions in Appendix F (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_f_-_procedures_relating_to_historic_properties_preservation.pdf) of the MSGP in advance or in conjunction with answering the questions in this section of the form. For more information about your State Historic Preservation Office (SHPO) or Tribal Historic Preservation Office (THPO), please visit the National Park Service (NPS) websites at:

- **State Historic Preservation Office (SHPO) (https://www.nps.gov/subjects/nationalregister/state-historic-preservation-offices.htm)**
- **Tribal Historic Preservation Office (THPO) (https://www.nps.gov/history/tribes/Tribal_Historic_Preservation_Officers_Program.htm)**

Are you an existing facility that is resubmitting for certification under the 2021 MSGP? Yes

If you are an existing facility you should have already addressed National Historic Preservation Act (NHPA) issues. To gain coverage under the 2015 MSGP, you were required to certify that you were either not affecting historic properties or had obtained written agreement from the relevant SHPO or THPO regarding methods of mitigating potential impacts.

Will you be constructing or installing any <u>new</u> stormwater control measures? No

You are eligible under **Criterion A**

Certification Information

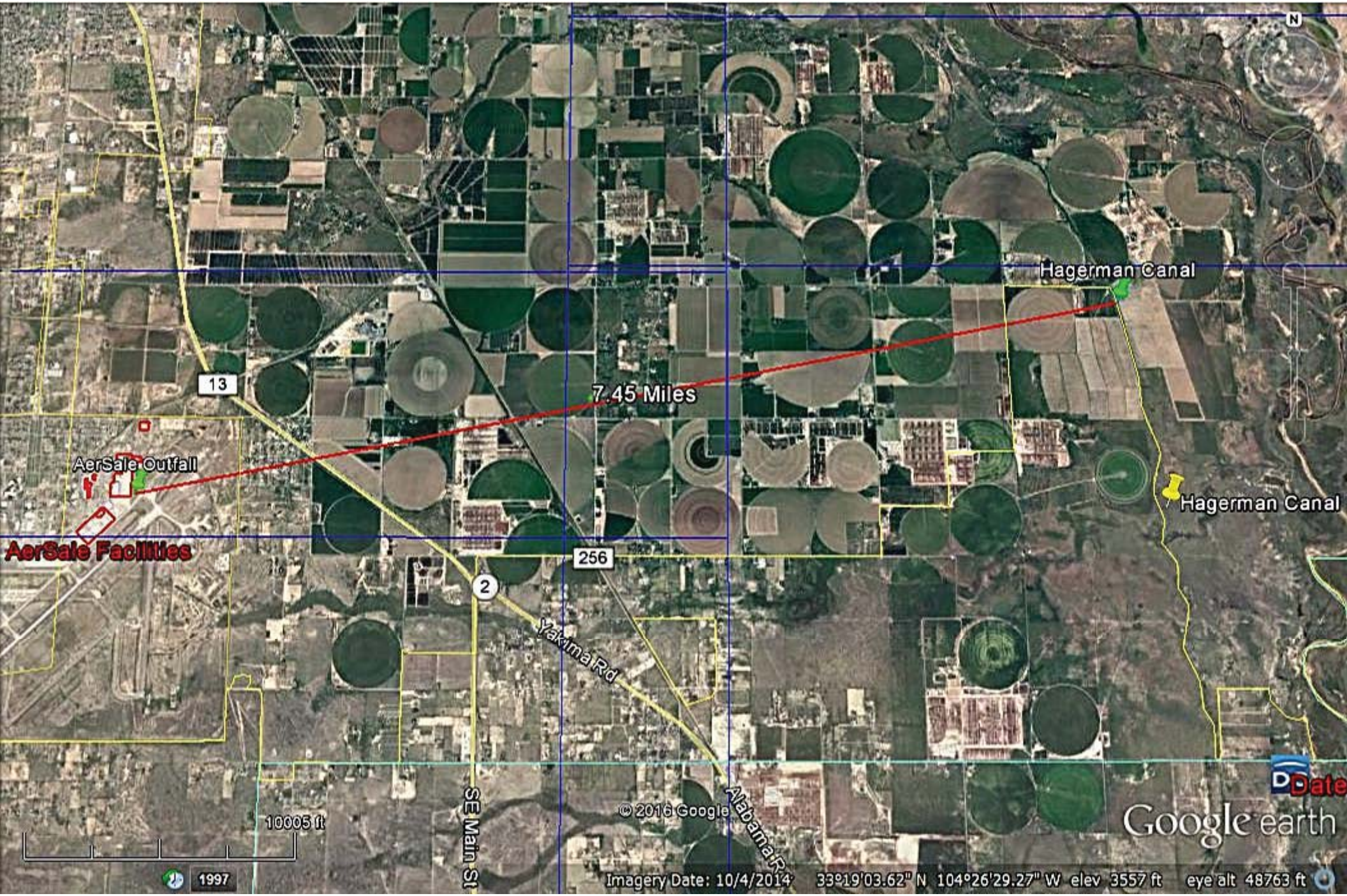
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Signing an electronic document on behalf of another person is subject to criminal, civil, administrative, or other lawful action.

Certified By: Randy A. Phelps

Certifier Title: General Manager

Certifier Email: randy.phelps@aersale.com

Certified On: 04/26/2021 12:53 PM ET


N
Hagerman Canal
13
7.45 Miles
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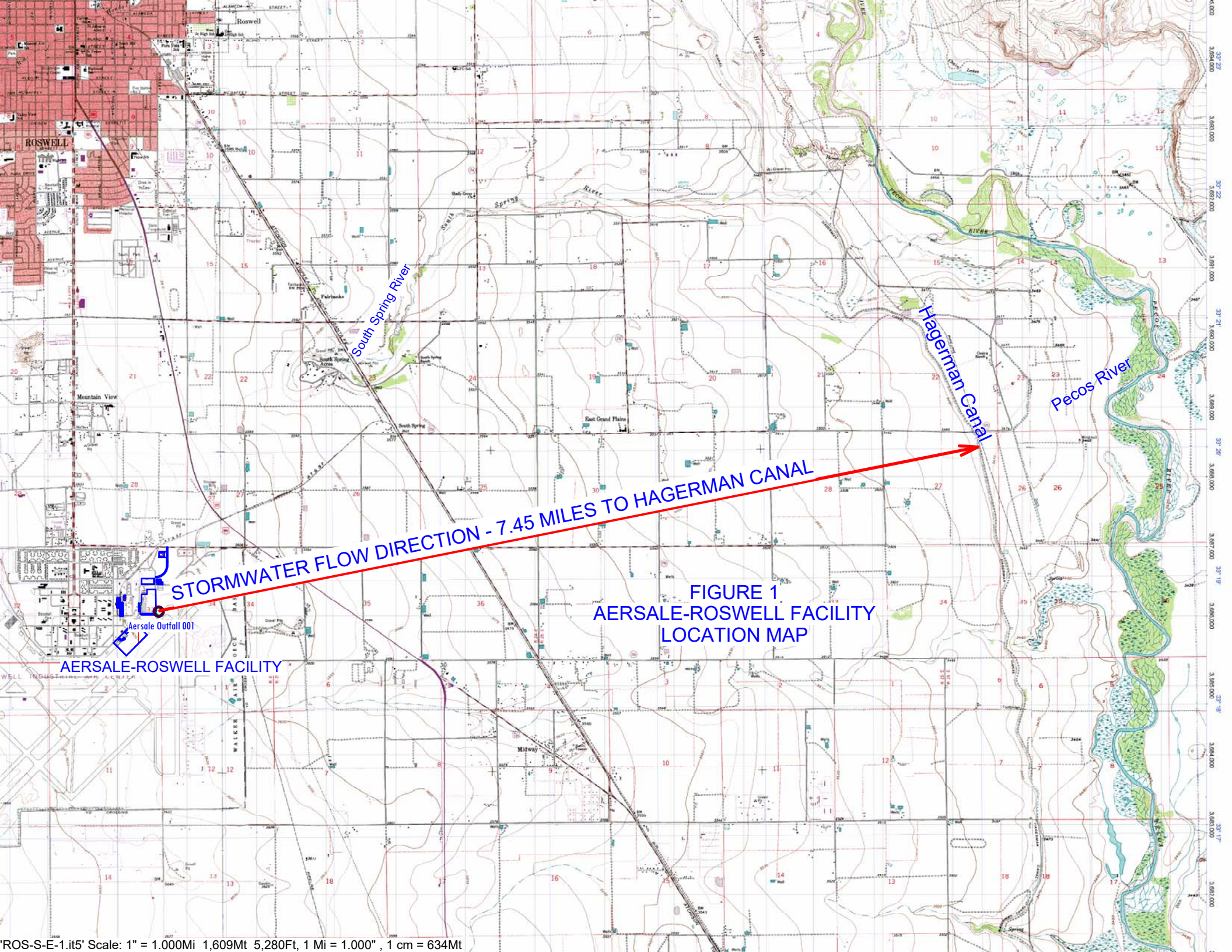

FIGURE 1
AERSALE-ROSWELL FACILITY
LOCATION MAP

'ROS-S-E-1.it5' Scale: 1" = 1.000Mi 1,609Mt 5,280Ft, 1 Mi = 1.000" , 1 cm = 634Mt

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New Mexico Ecological Services Field Office
2105 Osuna Road Ne
Albuquerque, NM 87113-1001
Phone: (505) 346-2525 Fax: (505) 346-2542
http://www.fws.gov/southwest/es/NewMexico/
http://www.fws.gov/southwest/es/ES_Lists_Main2.html

In Reply Refer To: April 20, 2021
Consultation Code: 02ENNM00-2016-SLI-0420
Event Code: 02ENNM00-2021-E-01923
Project Name: AerSale SWPPP (Updated)

Subject: Updated list of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

Thank you for your recent request for information on federally listed species and important wildlife habitats that may occur in your project area. The U.S. Fish and Wildlife Service (Service) has responsibility for certain species of New Mexico wildlife under the Endangered Species Act (ESA) of 1973 as amended (16 USC 1531 et seq.), the Migratory Bird Treaty Act (MBTA) as amended (16 USC 701-715), and the Bald and Golden Eagle Protection Act (BGEPA) as amended (16 USC 668-668c). We are providing the following guidance to assist you in determining which federally imperiled species may or may not occur within your project area and to recommend some conservation measures that can be included in your project design.

FEDERALLY-LISTED SPECIES AND DESIGNATED CRITICAL HABITAT

Attached is a list of endangered, threatened, and proposed species that may occur in your project area. Your project area may not necessarily include all or any of these species. Under the ESA, it is the responsibility of the Federal action agency or its designated representative to determine if a proposed action "may affect" endangered, threatened, or proposed species, or designated critical habitat, and if so, to consult with the Service further. Similarly, it is the responsibility of the Federal action agency or project proponent, not the Service, to make "no effect" determinations. If you determine that your proposed action will have "no effect" on threatened or endangered species or their respective critical habitat, you do not need to seek concurrence with the Service. Nevertheless, it is a violation of Federal law to harm or harass any federally-listed threatened or endangered fish or wildlife species without the appropriate permit.

If you determine that your proposed action may affect federally-listed species, consultation with the Service will be necessary. Through the consultation process, we will analyze information contained in a biological assessment that you provide. If your proposed action is associated with

Federal funding or permitting, consultation will occur with the Federal agency under section 7(a)(2) of the ESA. Otherwise, an incidental take permit pursuant to section 10(a)(1)(B) of the ESA (also known as a habitat conservation plan) is necessary to harm or harass federally listed threatened or endangered fish or wildlife species. In either case, there is no mechanism for authorizing incidental take "after-the-fact." For more information regarding formal consultation and HCPs, please see the Service's Consultation Handbook and Habitat Conservation Plans at www.fws.gov/endangered/esa-library/index.html#consultations.

The scope of federally listed species compliance not only includes direct effects, but also any interrelated or interdependent project activities (e.g., equipment staging areas, offsite borrow material areas, or utility relocations) and any indirect or cumulative effects that may occur in the action area. The action area includes all areas to be affected, not merely the immediate area involved in the action. Large projects may have effects outside the immediate area to species not listed here that should be addressed. If your action area has suitable habitat for any of the attached species, we recommend that species-specific surveys be conducted during the flowering season for plants and at the appropriate time for wildlife to evaluate any possible project-related impacts.

Candidate Species and Other Sensitive Species

A list of candidate and other sensitive species in your area is also attached. Candidate species and other sensitive species are species that have no legal protection under the ESA, although we recommend that candidate and other sensitive species be included in your surveys and considered for planning purposes. The Service monitors the status of these species. If significant declines occur, these species could potentially be listed. Therefore, actions that may contribute to their decline should be avoided.

Lists of sensitive species including State-listed endangered and threatened species are compiled by New Mexico state agencies. These lists, along with species information, can be found at the following websites:

Biota Information System of New Mexico (BISON-M): www.bison-m.org

New Mexico State Forestry. The New Mexico Endangered Plant Program: www.emnrd.state.nm.us/SFD/ForestMgt/Endangered.html

New Mexico Rare Plant Technical Council, New Mexico Rare Plants: nmrareplants.unm.edu

Natural Heritage New Mexico, online species database: nhnm.unm.edu

WETLANDS AND FLOODPLAINS

Under Executive Orders 11988 and 11990, Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and floodplains, and preserve and enhance their natural and beneficial values. These habitats should be conserved through avoidance, or mitigated to ensure that there would be no net loss of wetlands function and value.

We encourage you to use the National Wetland Inventory (NWI) maps in conjunction with ground-truthing to identify wetlands occurring in your project area. The Service's NWI program website, www.fws.gov/wetlands/Data/Mapper.html integrates digital map data with other resource information. We also recommend you contact the U.S. Army Corps of Engineers for permitting requirements under section 404 of the Clean Water Act if your proposed action could impact floodplains or wetlands.

MIGRATORY BIRDS

The MBTA prohibits the taking of migratory birds, nests, and eggs, except as permitted by the Service's Migratory Bird Office. To minimize the likelihood of adverse impacts to migratory birds, we recommend construction activities occur outside the general bird nesting season from March through August, or that areas proposed for construction during the nesting season be surveyed, and when occupied, avoided until the young have fledged.

We recommend review of Birds of Conservation Concern at website www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html to fully evaluate the effects to the birds at your site. This list identifies birds that are potentially threatened by disturbance and construction.

BALD AND GOLDEN EAGLES

The bald eagle (*Haliaeetus leucocephalus*) was delisted under the ESA on August 9, 2007. Both the bald eagle and golden eagle (*Aquila chrysaetos*) are still protected under the MBTA and BGEPA. The BGEPA affords both eagles protection in addition to that provided by the MBTA, in particular, by making it unlawful to "disturb" eagles. Under the BGEPA, the Service may issue limited permits to incidentally "take" eagles (e.g., injury, interfering with normal breeding, feeding, or sheltering behavior nest abandonment). For information on bald and golden eagle management guidelines, we recommend you review information provided at www.fws.gov/midwest/eagle/guidelines/bgepa.html.

On our web site www.fws.gov/southwest/es/NewMexico/SBC_intro.cfm, we have included conservation measures that can minimize impacts to federally listed and other sensitive species. These include measures for communication towers, power line safety for raptors, road and highway improvements, spring developments and livestock watering facilities, wastewater facilities, and trenching operations.

We also suggest you contact the New Mexico Department of Game and Fish, and the New Mexico Energy, Minerals, and Natural Resources Department, Forestry Division for information regarding State fish, wildlife, and plants.

Thank you for your concern for endangered and threatened species and New Mexico's wildlife habitats. We appreciate your efforts to identify and avoid impacts to listed and sensitive species in your project area. For further consultation on your proposed activity, please call 505-346-2525 or email nmesfo@fws.gov and reference your Service Consultation Tracking Number.

Attachment(s):

- Official Species List
- Migratory Birds

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

New Mexico Ecological Services Field Office
2105 Osuna Road Ne
Albuquerque, NM 87113-1001
(505) 346-2525

Project Summary

Consultation Code: 02ENNM00-2016-SLI-0420
Event Code: 02ENNM00-2021-E-01923
Project Name: AerSale SWPPP (Updated)
Project Type: WATER QUALITY MODIFICATION
Project Description: Located at Roswell Airport, approximately 68 acres, development of a MSGP SWPPP, timing by April 20, 2021 or as soon as possible thereafter, MSGP

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@33.31162973180736,-104.512370812021,14z

Counties: Chaves County, New Mexico

Endangered Species Act Species

There is a total of 11 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Birds

NAME	STATUS
Northern Aplomado Falcon *Falco femoralis septentrionalis* Population: U.S.A (AZ, NM) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1923	Experimental Population, Non-Essential
Piping Plover *Charadrius melodus* Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is **final** critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened

Fishes

NAME	STATUS
Pecos Bluntnose Shiner *Notropis simus pecosensis* There is **final** critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/4362	Threatened
Pecos Gambusia *Gambusia nobilis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/460	Endangered

Snails

NAME	STATUS
Koster's Springsnail *Juturnia kosteri* There is **final** critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/3126	Endangered
Pecos Assiminea Snail *Assiminea pecos* There is **final** critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/4519	Endangered
Roswell Springsnail *Pyrgulopsis roswellensis* There is **final** critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/923	Endangered

Crustaceans

NAME	STATUS
Noel's Amphipod *Gammarus desperatus* There is **final** critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/8042	Endangered

Flowering Plants

NAME	STATUS
Kuenzler Hedgehog Cactus *Echinocereus fendleri var. kuenzleri* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2859	Threatened
Pecos (=puzzle, =paradox) Sunflower *Helianthus paradoxus* There is **final** critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/7211	Threatened
Wright's Marsh Thistle *Cirsium wrightii* Population: There is **proposed** critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/8963	Proposed Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

---

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

THERE ARE NO FWS MIGRATORY BIRDS OF CONCERN WITHIN THE VICINITY OF YOUR PROJECT AREA.

Migratory Birds FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the AKN Phenology Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?
The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets .

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?
To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide, or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?
Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects
For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical

Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?
If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report
The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

ATTACHMENT M

SWPPP MODIFICATIONS

ATTACHMENT N

AERSALE NOI, USEPA CORRESPONDENCE, MSGP

Mary Barron

From: Lemon, Shelly, ENV <Shelly.Lemon@env.nm.gov>
Sent: Thursday, June 1, 2023 5:24 PM
To: Mary Barron; Nasim Jahan (jahan.nasim@epa.gov)
Cc: Dean, Levi, ENV
Subject: RE: [EXTERNAL] Question whether client would discharge into "Impaired Waters"

Hi Mary,

The Pecos River where your client is discharging is not a Tier 3 water. It is the Pecos Headwaters that are Tier 3 (ONRWs).

The Pecos River where your client is discharging is Tier 1 for temperature and Tier 2 for all other pollutants. Tier 2 is the default protection level for perennial and intermittent waters where water quality is better than the applicable water quality standards.

Hope this helps.
Best,
Shelly

Shelly Lemon
Chief - Surface Water Quality Bureau
New Mexico Environment Department
Cell: (505) 470-5018
Pronouns: she/her

shelly.lemon@env.nm.gov
https://www.env.nm.gov/surface-water-quality/

From: Mary Barron <mary@barronsenvironmental.com>
Sent: Thursday, June 1, 2023 5:16 PM
To: Nasim Jahan (jahan.nasim@epa.gov) <jahan.nasim@epa.gov>
Cc: Lemon, Shelly, ENV <Shelly.Lemon@env.nm.gov>
Subject: FW: [EXTERNAL] Question whether client would discharge into "Impaired Waters"

Nasim,

I've run into a problem that I cannot fix via a "Change NOI." As Shelly notes below, AerSale (NPDES ID NMR 05J01V) is ultimately discharging into an impaired water, the Pecos river. The Pecos is impaired only by temperature about which we can monitor, per Shelly's staff, by taking and recording the temperature of the first 30 minutes of a rainstorm, recording the temperature, and reporting it in our annual report. However, the Pecos is also a Tier 3 water and I incorrectly answered "No" to that question on the NOI. That information is now locked on the NOI and I cannot change the answer to "Yes" via a Change NOI. The NOI instructions say I must submit a new form.

What must I do in this case? Should I issue a notice of termination of the existing permit and then submit a new NOI? If so, is the eligibility information In the existing NOI still acceptable? Except for the question about the Tier 3 water, the rest of the NOI is correct.

Please give me your guidance on this problem.

Thanks,
Mary Barron

From: Lemon, Shelly, ENV <Shelly.Lemon@env.nm.gov>
Sent: Friday, May 26, 2023 5:13 PM
To: Mary Barron <mary@barronsenvironmental.com>
Cc: Nasim Jahan (jahan.nasim@epa.gov) <jahan.nasim@epa.gov>; Dean, Levi, ENV <Levi.Dean@env.nm.gov>; LucasKamat, Susan, ENV <Susan.LucasKamat@env.nm.gov>
Subject: RE: [EXTERNAL] Question whether client would discharge into "Impaired Waters"

Hi Mary,

The Pecos River in this segment is impaired for temperature and requires a TMDL (Parameter IR Category "5/5A"). The Pecos River in this reach does not have an EPA-Approved or Established TMDL.

According to the 2021 MSGP:

> You are considered to discharge to an impaired water if the first water of the United States to which you discharge is identified by a state, tribe or EPA as not meeting an applicable water quality standard and requires development of a TMDL.

So, I would say that it is discharging to an impaired water since the first WOTUS is the Pecos River, which is impaired.

The "Parameters of Concern" you mention below are related to fish tissue analyses from this stream reach – fish collected in the Pecos River in this area have detectable levels of DDT and PCBs in their muscle tissue, but not at concentrations that warrant issuance of a health-based fish consumption advisory.

I copied Levi Dean (Stormwater Team Supervisor) and Susan Lucas Kamat (Point Source Section Manager) in case they have other input or you have additional questions.

Thanks,
Shelly

Shelly Lemon
Chief - Surface Water Quality Bureau
New Mexico Environment Department
Cell: (505) 470-5018
Pronouns: she/her

shelly.lemon@env.nm.gov
https://www.env.nm.gov/surface-water-quality/

From: Mary Barron <mary@barronsenvironmental.com>
Sent: Friday, May 26, 2023 12:12 PM
To: Lemon, Shelly, ENV <Shelly.Lemon@env.nm.gov>
Cc: Nasim Jahan (jahan.nasim@epa.gov) <jahan.nasim@epa.gov>
Subject: [EXTERNAL] Question whether client would discharge into "Impaired Waters"

Shelly,

Don't know whether to indicate discharge to impaired waters on my client's NOI for MSGP coverage.

My client's stormwater would, based on topographical land contour's, reach the Hagerman Canal, ~7 miles away, at a point about 2 miles south of where the Rio Hondo intersects the Pecos River. The Hagerman Canal can be discharged into the Pecos River at the Hagerman Irrigation Company's discretion. The Hagerman-to-Pecos discharge point is called the "9-mile Dump" and enters the Pecos River at a point between Pecos River's intersections with the Rio Hondo and the Rio Felix. This section of the Pecos is impaired. The attached excerpt from NM's 303(d) list shows an impairment due to temperature but then in the next column lists "Parameters of Concern." Also attached is the language of NMAC 20.4.6.206, the regulation called out in the 303(d) list.

So since my client's storm water can reach the Hagerman Canal, would NM and EPA consider that my client would discharge into an impaired water?

Thanks,

Mary Barron
.

NPDES FORM 3510-6	EPA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 NOTICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	FORM Approved OMB No. 2040-0004

Permit Information

Master Permit Number: NMR050000

NPDES ID: NMR05J01V

Eligibility Information

State/territory where your facility is discharging: NM

Does your facility discharge to federally recognized Indian Country lands? No

Are you a *"Federal Operator"* as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?

No

Which type of form would you like to submit? Notice of Intent (NOI)

By indicating "Yes" below, I confirm that I understand that the MSGP only authorizes the stormwater discharges in Part 1.1.2 and the allowable non-stormwater discharges listed in Part 1.2.2. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.2.1. and 1.2.2. will be discharged, they must be covered under another NPDES permit.

Yes

Are you a new discharger or a new source as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?

No

- **Have stormwater discharges from your facility been covered previously under an NPDES permit?** Yes
  - **If yes, provide your most current NPDES ID (i.e., permit tracking number) if you had coverage under EPA's MSGP or the NPDES permit number if you had coverage under an EPA individual permit:**

    NMR05J01V
- **Are you discharging to any waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 3 water (Outstanding National Resource water)? (See Appendix L (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_l_-_list_of_tier_3_tier_2_and_tier_2.5_waters.pdf))**

  No

Do you anticipate the discharge of groundwater or spring water from your facility? No

What is the legal name of the Operator as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?

AerSale Inc.

What is the name of your facility or activity as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?

AerSale Inc., Roswell, NM Facility

Operator Information

Operator Information

Operator Name: AerSale Inc.

Operator Mailing Address

Address Line 1: 703 E. Challenger St.

Address Line 2:

City: Roswell

ZIP/Postal Code: 88203

State: NM

County or Similar Division: Chaves

Operator Point of Contact Information

First Name Middle Initial Last Name: Randy Phelps

Title: General Manager

Phone: 575-624-3140 **Ext.:** 3316

Email: randy.phelps@aersale.com

NOI Preparer Information

☑ **This NOI is being prepared by someone other than the certifier.**

First Name Middle Initial Last Name: Mary F Barron

Organization: Barron's Environmental Solutions - In Time!, Inc.

Phone: 575-622-7224 **Ext.:**

Email: mary@barronsenvironmental.com

Facility Information

Facility Information

Facility Name: AerSale Inc., Roswell, NM Facility

Facility Address

Address Line 1: 703 E. Challenger St.

Address Line 2:

City: Roswell

ZIP/Postal Code: 88203

State: NM

County or Similar Division: Chaves

Latitude/Longitude for the Facility

Latitude/Longitude: 33.3139°N, 104.5129°W

Latitude/Longitude Data Source: Map

Horizontal Reference Datum: NAD 83

General Facility Information

What is the ownership type of the facility? Municipality

Estimated area of industrial activity at your facility exposed to stormwater (rounded to the nearest quarter acre): 38

Is your facility presently inactive and unstaffed? No

Exception for Inactive and Unstaffed Facilities: The requirement for indicator monitoring, impaired waters monitoring, and/or benchmark monitoring does not apply at a facility that is inactive and unstaffed, as long as there are no industrial materials or activities exposed to stormwater.

If circumstances change during the permit term that affect your qualifications for this exception to monitoring requirements (i.e. industrial materials or activities exposure to stormwater or your facility's active/inactive and staffed/unstaffed status) you must submit a NOI notifying EPA of the change in circumstances.

Sector-Specific Information

Primary Sector: S **Primary Subsector:** S1

Primary SIC Code: 4581

Co-Located Sectors:

Co-Located Sector: N **Co-Located Subsector:** N1 **Co-Located SIC Code:** 5093

If you are a Sector S (Air Transportation) facility, do you anticipate using more than 100,000 gallons of pure glycol in glycol-based deicing fluids and/or 100 tons or more of urea on an average annual basis?

No

Discharge Information

By indicating "Yes" below, I confirm that I understand that the MSGP only authorizes the stormwater discharges in Part 1.2.1 and the allowable non-stormwater discharges listed in Part 1.2.2. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the authorized stormwater and non-stormwater discharges listed in Parts 1.2.1 and 1.2.2 will be discharged, they must be covered under another NPDES permit.

Yes

Federal Effluent Limitation Guidelines

Identify the Effluent Limitation Guideline(s) that apply to your stormwater discharges.

40 CFR Part/Subpart	Eligible Discharges	Affected MSGP Sector	New Source Date	Applicability
Part 449	Existing and new primary airports with1,000 or more annual jet departures that discharge wastewater associated with airfield pavement deicing that contains urea commingled with stormwater	S	06/15/2012	**Does your facility have any discharges subject to this effluent limitation guideline?** No

Are you requesting permit coverage for any stormwater discharges subject to effluent limitation guidelines? No

Other Discharge Information

Do you anticipate the discharge of groundwater or spring water from your facility? No

Does your facility discharge into a Municipal Separate Sewer System (MS4)? No

Receiving Waters Information

List all of the stormwater discharge points from your facility.

Discharge Point 001: Outfall 001

Applicable Sectors

Select the Sectors/Subsector(s) that apply to this discharge point.

	Sector	Subsector	SIC/Activity Code
☑	**S** - AIR TRANSPORTATION FACILITIES	**S1** - Air Transportation Facilities	4581
☑	**N** - SCRAP RECYCLING FACILITIES	**N1** - Scrap Recycling and Waste Recycling Facilities except Source-Separated	5093

Latitude/Longitude: 33.3127°N, 104.5101°W

☐ **This discharge point is *Substantially Identical* to an existing discharge point.**

Receiving Water

GNIS Name:
n/a

Waterbody Name:
Hagerman Canal then Pecos River

Listed Water ID:
n/a

Is this receiving water saltwater or freshwater? Freshwater

Is this receiving water designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water)?

No

Will you have stormwater discharges from paved surfaces that will be initially sealed or re-sealed with coal-tar sealcoat where industrial activities are located during coverage under this permit?

No

Benchmark Monitoring

Are you subject to benchmark monitoring requirements for a hardness-dependent metal? Yes

➔ **What is the hardness of your receiving water(s)?** 1881.79

(mg/L)

Impaired Waters Monitoring

Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? No

Has a TMDL been completed for this receiving waterbody? No

SWPPP Information

Has the SWPPP been prepared in advance of filing this NOI, as required? Yes

SWPPP Contact Information:

First Name Middle Initial Last Name: Randy Phelps

Phone: 575-624-3140 **Ext.:** 3316

Email: randy.phelps@aersale.com

SWPPP Availability:

Your current SWPPP or certain information from your SWPPP must be made available through one of the following three options. Select one of the options and provide the required information.

Note: you are not required to post any confidential business information (CBI) or restricted information (as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)) (such information may be redacted), but you must clearly identify those portions of the SWPPP that are being withheld from public access.

☐ **Option 1: Attach a current copy of your SWPPP to this NOI.**

☑ **Option 2: Maintain a Current Copy of your SWPPP on an Internet page (Universal Resource Locator or URL).**

Provide the web address URL (e.g. http://www.example.com):

https://info.aersale.com/hubfs/Production/Quality%20Certificates/AerSale%20SWPPP%200708.pdf?t=1540457328057

☐ **Option 3: Provide the following information from your SWPPP:**

Endangered Species Protection Worksheet: Criterion C1

The following questions will help you determine your eligibility under Part 1.1.4 of the permit with respect to protection of Endangered Species Act (ESA) species and critical habitat(s). Please refer to Appendix E (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_e_-_procedures_relating_to_endangered_species_protection.pdf) of the 2021 MSGP for important information regarding your obligations under this permit concerning ESA-protected species and critical habitat(s).

Determine ESA Eligibility Criterion

Are your industrial activities already addressed in another operator's valid certification of eligibility for your "action area" under eligibility criteria A, C, D, or E of the 2021 MSGP?

No

Are your industrial activities the subject of a permit under section 10 of the ESA by the USFWS and/or NMFS, and this authorization addresses the effects of your facility's discharges and discharge-related activities on ESA-listed species and critical habitat?

No

You must determine whether species listed as either threatened or endangered under the Endangered Species Act, and/or their critical habitat are located in your facility's action area. ESA-listed species and critical habitat are under the purview of the NMFS and the USFWS.

Determine Your Action Area

Your "action area" (as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)) includes all areas to be affected directly or indirectly by the action and not merely the immediate area involved in the action, including areas beyond the footprint of the facility that are likely to be affected by stormwater discharges, discharge-related activities, and authorized non-stormwater discharges. You must select and confirm that all the following are true:

In determining my "action area", I have considered that discharges of pollutants into downstream areas can expand the action area well beyond the footprint of my facility and the discharge point(s). I have taken into account the controls I will be implementing to minimize pollutants and the receiving waterbody characteristics (e.g. perennial, intermittent, ephemeral) in determining the extent of physical, chemical, and/or biotic effects of the discharges. I confirm that all receiving waterbodies that could receive pollutants from my facility are included in my action area.

True

In determining my "action area", I have considered that discharge-related activities must also be accounted for in determining my action area. I understand that discharge-related activities are any activities that cause, contribute to, or result in stormwater and authorized non-stormwater point source discharges, and measures such as the siting, construction, and operation of stormwater controls to control, reduce, or prevent pollutants from being discharged. I understand that any new or modified stormwater controls that will have noise or other similar effects, and any disturbances associated with construction of controls, are part of my action area.

True

Provide a written description of your action area and explain your rationale for the extent of the action area drawn on your map. Click here for an example.

The action area for the AerSale-Roswell facility's stormwater discharges extends downstream from Outfall 001 is 0.0 miles because the nearest receiving waterbody is the Hagerman Canal, a distance of about 7.45 miles from Outfall 001 in the direction of the east-northeast surface water flow. The Hagerman Canal can be discharged into the Pecos River to avoid overflow. As shown on the attached Google earth aerial dated October 4, 2014 and on the topographic map, Figure 1, between the action area and the Hagerman Canal are numerous impediments to flow from the action area actually reaching Hagerman Canal: bar ditches, cultivated farm land, residences, etc. The downstream limit of the action area reflects the approximate distance at which the discharge waters and any pollutants would be expected to cause potential adverse effects to listed species and/or critical habitat because of (a) the distance from the action area to the receiving waterbody as well as impediments to flow to the waterbody, and (b) the facility has been in constant use since the early 1940s (it was originally part of the military Walker Air Force Base) and no listed land species would be expected to still be present.
The species of concern are aquatic species in the Pecos River, into which the Hagerman Canal can be discharged.

Attach a map of the action area for your facility. Mapping tool IPaC (the Information, Planning, and Consultation System) located at http://ecos.fws.gov/ipac/ (https://ecos.fws.gov/ipac/) or click here (/net-msgp/documents/action_area_example.pdf) for an example.

Name	Uploaded Date	Size
AerSale ActionArea Maps.pdf (attachment/706863)	04/20/2021	681.20 KB

Determine if ESA-listed species and/or critical habitat are in your facility's action area.

ESA-listed species and critical habitat are under the purview of the NMFS and the USFWS, and in many cases, you will need to acquire species and critical habitat lists from both federal agencies.

National Marine Fisheries Service (NMFS)

To obtain NMFS-listed species and critical habitat information, use the resources listed below:

General Resources:

- NOAA Fisheries, Regions Page (https://www.fisheries.noaa.gov/regions)

For the Northeastern U.S.:

- NOAA Fisheries Greater Atlantic Region ESA Section 7 Mapper (https://noaa.maps.arcgis.com/apps/webappviewer/index.html?id=1bc332edc5204e03b250ac11f9914a27)

For Puerto Rico:

- *Acropora* critical habitat map (https://www.fisheries.noaa.gov/resource/map/acropora-elkhorn-and-staghorn-coral-critical-habitat-map-and-gis-data)
- Green turtle critical habitat map (https://www.fisheries.noaa.gov/resource/map/green-turtle-critical-habitat-map-and-gis-data)
- Hawksbill Turtle critical habitat map (https://www.fisheries.noaa.gov/resource/map/hawksbill-turtle-critical-habitat-map-and-gis-data)

Western U.S.:

- West Coast Region Protected Resources App (https://www.webapps.nwfsc.noaa.gov/portal/apps/webappviewer/index.html?id=7514c715b8594944a6e468dd25aaacc9)

Pacific Islands:

- Contact the Pacific Islands Regional Office at (808) 725-5000 or pirohonolulu@noaa.gov (mailto:pirohonolulu@noaa.gov)

I have checked the webpages listed above and confirmed that: There are no NMFS-listed species and/or critical habitat in my action area.

U.S. Fish and Wildlife Service (USFWS)

To obtain FWS-listed species and critical habitat information, use the resources listed below:

- IPaC (the Information, Planning, and Consultation System) (https://ecos.fws.gov/ipac/)
- For instructions for using IPaC, click here.

I have checked the webpages listed above and confirmed that: There are FWS-listed species and/or critical habitat in my action area.

For FWS species, include the full printout from your IPaC query/Official Species List.

Name	Uploaded Date	Size
AerSale Species List_ New Mexico Ecological Services Field Office.pdf (attachment/706864)	04/20/2021	540.41 KB

You may be eligible under **Criterion C.** You must assess whether your discharges and discharge-related activities are likely to adversely affect ESA-listed species or critical habitat, and whether any additional measures are necessary to ensure no likely adverse effects. In order to make a determination of your facility's likelihood of adverse effects, you must complete the Criterion C Eligibility fields below.

Criterion C Eligibility

Select which applies:

Criterion C1: Facility eligible for Criterion C in the 2015 MSGP with no change to ESA-listed species, critical habitat, or action area.

Your facility was eligible for Criterion C in the 2015 MSGP and there has been no change in your facility's action area and you have confirmed that there are no additional ESA-listed species or critical habitat under the jurisdiction of USFWS and/or NMFS in your action area since your certification under Criterion C in the 2015 MSGP. You must provide a description of the basis of this criterion selected on your NOI form and provide documentation supporting your eligibility determination in your SWPPP.

Select which applies:

I am seeking coverage under the MSGP as an existing discharger and there are no modifications to my facility.

Provide a basis statement providing the USFWS and/or NMFS resources consulted that helped you determine that there are no additional ESA-listed species and/or critical habitat have been listed by under the jurisdiction of the Services in your action area.

From the updated USFWS species list attached: Birds: The Least Tern, Sterna antillarum ,
has been deleted from the current list and no birds have been added. Fishes: none have been added. Snails: none have been added. Crustaceans: none have been added. Flowering Plants: none have been added. Per USFWS, "There are no critical habitats within your project area under this office's jurisdiction"

Note: Any missing or incomplete information in this section may result in a delay of your coverage under the permit.

Historic Preservation: Criterion A

The following questions will help you determine your eligibility under Part 1.1.5 of the permit with respect to preservation of historic properties. You may still use the paper instructions in Appendix F (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_f_-_procedures_relating_to_historic_properties_preservation.pdf) of the MSGP in advance or in conjunction with answering the questions in this section of the form. For more information about your State Historic Preservation Office (SHPO) or Tribal Historic Preservation Office (THPO), please visit the National Park Service (NPS) websites at:

- **State Historic Preservation Office (SHPO) (https://www.nps.gov/subjects/nationalregister/state-historic-preservation-offices.htm)**
- **Tribal Historic Preservation Office (THPO) (https://www.nps.gov/history/tribes/Tribal_Historic_Preservation_Officers_Program.htm)**

Are you an existing facility that is resubmitting for certification under the 2021 MSGP? Yes

If you are an existing facility you should have already addressed National Historic Preservation Act (NHPA) issues. To gain coverage under the 2015 MSGP, you were required to certify that you were either not affecting historic properties or had obtained written agreement from the relevant SHPO or THPO regarding methods of mitigating potential impacts.

Will you be constructing or installing any <u>new</u> stormwater control measures? No

You are eligible under **Criterion A**

Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Signing an electronic document on behalf of another person is subject to criminal, civil, administrative, or other lawful action.

Certified By: Randy A. Phelps

Certifier Title: General Manager

Certifier Email: randy.phelps@aersale.com

Certified On: 04/26/2021 12:53 PM ET

ATTACHMENT O

ANNUAL REPORTS

NPDES FORM 6100-28		UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 ANNUAL REPORT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	FORM Approved OMB No. 2040-0300

Permit Information

Report Year: 2021

Reporting Period: 01/01/2021 to 12/31/2021

NPDES ID: NMR05J01V

Facility Information

Facility Name: AerSale Inc., Roswell, NM Facility

Facility Point of Contact

First Name **Middle Initial** **Last Name:** Randy Phelps

Phone: 575-624-6140 **Ext.:**

Email: randy.phelps@aersale.com

Facility Mailing Address

Address Line 1: 703 E. Challenger St.

Address Line 2:

City: Roswell

ZIP/Postal Code: 88203

State: NM

County or Similar Division: Chaves

General Findings

Provide a summary of your past year's routine facility inspection documentation, including dates (see Part 3.1.6 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.9 effluent limitation through the use of non-urea-containing deicers, provide a statement certifying that you do not use pavement deicers containing urea (e.g., "Urea was not used at [name of airport] for pavement deicing in the past year and will also not be used in 2021." (Note: Operators of airport facilities that are complying with Part 8.S.9 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)

AerSale, Inc., Roswell Facility, conducted no pavement or aircraft de-icing and used no urea, nor will AerSale use any urea in 2022. Routine quarterly inspections were actually carried out daily, including on dates March 30, June 30, October 30, and December 23, 2021. No non-permitted conditions were found.

Provide a summary of your past year's quarterly visual assessment documentation, including dates (see Part 3.2.3 of the permit).

Qtr 1: 6/28/2021: sample results were slightly above MCL for TSS, Al, and Cu. Adjoining companies contribute to the "AerSale Outfall," Outfall 001. There was insufficient rainfall or snowmelt for sample collection during Qtrs 2, 3, and 4, or for any time during the year 2021 after 6/28/2021.

Provide a summary of your past year's corrective action and/or additional implementation measures (AIM) documentation (See Part 5.3 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Note that you must modify your SWPPP based on the corrective actions and deadlines required under Part 5. Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

```
No corrective action was warranted and, therefore,  none was taken.
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Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certified By: Randy A. Phelps

Certifier Title: General Manager

Certifier Email: randy.phelps@aersale.com

Certified On: 01/27/2022 3:39 PM ET

NPDES FORM 6100-28	EPA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 ANNUAL REPORT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	FORM Approved OMB No. 2040-0004

Permit Information

Report Year: 2020

Reporting Period: 1/1/2020 to 12/31/2020

NPDES ID: NMR05J01V

Facility Information

Facility Name: AerSale Inc., Roswell, NM Facility

Facility Point of Contact

First Name **Middle Initial** **Last Name:** Randy Phelps

Phone: 575-624-3140 **Ext.:** 3316

Email: randy.phelps@aersale.com

Facility Mailing Address

Address Line 1: 703 E. Challenger St.

Address Line 2:

City: Roswell

ZIP/Postal Code: 88203

State: NM

County or Similar Division: Chaves

General Findings

Provide a summary of your past year's routine facility inspection documentation (see Part 3.1.2 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.8.1 effluent limitation through the use of non-urea-containing deicers, provide a statement certifying that you do not use pavement deicers containing urea (e.g., "Urea was not used at [name of airport] for pavement deicing in the past year and will also not be used in 2015." (Note: Operators of airport facilities that are complying with Part 8.S.8.1 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)

Routine facility Inspections were carried out quarterly for quarters 1, 2, 3, and 4 of the year 2020. No non-permitted conditions were found. AerSale Inc., Roswell, NM Facility conducted no pavement deicing and used no urea.

Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).

Quarterly Visual Assessments were carried out four times during year 2020 when storm water discharges caused by rainfall or snowmelt occurred. Samples collected during these assessments were visually inspected for color, odor, clarity (diminished); floating solids; settled solids; suspended solids; foam; oil sheen; and other obvious indicators of storm water pollution. No samples showed indicators of storm water pollution.

For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of your control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.

N/A

Provide a summary of your past year's corrective action documentation (See Part 4.4 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

No conditions requiring corrective action were found during the year 2020. AerSale Inc., Roswell, NM Facility is in compliance with the permit.

Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certified By: Randy A. Phelps

Certifier Title: General Manager

Certifier Email: randy.phelps@aersale.com

Certified On: 01/28/2021 4:00 PM ET

NPDES FORM 6100-28	EPA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 ANNUAL REPORT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	FORM Approved OMB No. 2040-0004

Permit Information

Report Year: 2019

Reporting Period: 1/1/2019 to 12/31/2019

NPDES ID: NMR05J01V

Facility Information

Facility Name: AerSale Inc., Roswell, NM Facility

Facility Point of Contact

First Name **Middle Initial** **Last Name:** Randy A Phelps

Phone: 575-624-3140 **Ext.:** 3116

Email: randy.phelps@aersale.com

Facility Mailing Address

Address Line 1: 703 E. Challenger St.

Address Line 2:

City: Roswell

ZIP/Postal Code: 88203

State: NM

County or Similar Division: Chaves

General Findings

Provide a summary of your past year's routine facility inspection documentation (see Part 3.1.2 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.8.1 effluent limitation through the use of non-urea-containing deicers, provide a statement certifying that you do not use pavement deicers containing urea (e.g., "Urea was not used at [name of airport] for pavement deicing in the past year and will also not be used in 2015." (Note: Operators of airport facilities that are complying with Part 8.S.8.1 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)

No findings at this time, all quarterly reports have been accomplished using the AerSale Quarterly Inspection Report form. These records are on file at 703 E Challenger Roswell NM, 88203.

Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).

Quarterly Visual Inspections were accomplished however at each quarter we were unable to obtain samples due to no rain or snow melt sufficient enough to create discharge. There was no precipitation during three quarters and limited precipitation during one quarter.

For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of your control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.

AerSale-Roswell uses no urea or salt. Glycol is used as antifreeze in windshield washer fluid and radiators in ground vehicles and in employee and vendor vehicles. The total amount of glycol used is significantly below the limit of 100,000 gallons per year. Therefore, AerSale-Roswell has no sector-specific benchmarks per Part 8.S.7 and Table 8.S-1 in the MSGP, is not subject to the effluent limitations in Parts 8.S.8.1 and 8.S.8.2 of the MSGP and has no requirement to conduct quarterly benchmark monitoring or annual effluent limitations monitoring of stormwater discharge. Finally, the receiving surface water body, the Pecos River, is not impaired, so AerSale-Roswell is not required to conduct impaired waters monitoring. Therefore, AerSale-Roswell is not subject to the Discharge Monitoring Reports requirements of MSGP Part 7.4.

Provide a summary of your past year's corrective action documentation (See Part 4.4 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

N/A AerSale, Inc. SWPPP was put into effect in April of 2019 there were no prior documented findings.

Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certified By: Randy A. Phelps

Certifier Title: General Manager

Certifier Email: randy.phelps@aersale.com

Certified On: 02/21/2020 1:27 PM ET