

**USEPA 2015 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

Mary F. Barron
President

Barron's Environmental Solutions — In Time!, Inc.
11 Cajun Court
Roswell, New Mexico 88201

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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-Roswell]

Street: 703 E. Challenger St.

City: Roswell

State: NM

Zip Code: 88203

County: Chaves

NPDES ID: None

Primary Industrial Activity SIC code, and Sector and Subsector:

SIC Codes 4512-4581, Sector S, Subsector S1

Co-located Industrial Activity(s) SIC code(s), Sector(s) and Subsector(s)

SIC Code 5093, Sector N, Subsector N1

Latitude/Longitude

Latitude: 33.3144°N

Longitude: 104.5121°W

Determined by USGS topographic map (Scale 1:24,000)

Horizontal Reference Datum: NAD 83

Facility is not located in Indian territory.

AerSale-Roswell is not considered a “federal operator” of the facility.

Estimated area of industrial activity at site exposed to stormwater: 37.6 acres

Discharge Information

This facility discharges stormwater to Outfall 001 via storm drains into a municipal separate stormwater system.

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

This facility does not discharge industrial stormwater into any segment of an “impaired water.”

This facility does not discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5 or Tier 3 water.

I.B CONTACT INFORMATION/RESPONSIBLE PARTIES

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, Joseph W. Neeb, City Manager

Address: 425 North Richardson

City, State, Zip Code: Roswell, NM 88201

Telephone Number: 575-637-6269

Email address: j.neeb@roswell-nm.gov

Fax number: 575-624-6709

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

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

I.C. SWPPP CONTENTS [5.2], CERTIFICATION [5.2.7], AND PREPARER [5.1]

This SWPPP contains all of 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.

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 A, Subsection B.11.A]

Appendix 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 A, Subsection B.11.A]

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. STORM WATER POLLUTION PREVENTION TEAM [5.2.1]

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
- Environmental, Health, and Safety Manager – Oversees implementation of the SWPPP
- Maintenance Supervisor – Oversees all maintenance activities

I.E. SITE DESCRIPTION [5.2.2.]

1. Activities at the Facility [5.2.2.1]

AerSale is a tenant of the Roswell International Air Center (RIAC). AerSale-Roswell's operations include maintenance, storage, and dismantling (tear down) of both large and small aircraft and turbine engines; 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 Stewart Industries – Third-Party Company Located Among AerSale-Roswell Facilities

AerSale-Roswell's facilities are not contiguous. As Figure 2, Site Map, shows, there is Part 1 comprising the areas of Buildings 93, 240, and 92; Part 2 comprising the areas of Buildings 112, 115, 118, and 85, with Stewart Industries' area located adjacent to Building 85's area on the south; and Part 3 comprising the areas of Buildings 73, 66, and 58, with Stewart Industries' area located adjacent this whole area on the north. Stewart Industries has potential pollutant sources, the discharge of which could run onto the AerSale-Roswell facilities on the north and south. In addition, water from Stewart Industries' storm drains will commingle with water from AerSale-Roswell's storm drains.

When a run-on from Stewart Industries to AerSale-Roswell's facility causes an exceedance, in addition to reviewing and revising, as appropriate, this SWPPP, AerSale-Roswell will notify Stewart Industries to abate its pollutant contribution. AerSale-Roswell will contact both the RIAC Airport

Director and USEPA Region 6 if Stewart Industries fails to take action to address the stormwater run-on. [4.2]

3. General Location Map [5.2.2.2]

AerSale-Roswell comprises approximately 57.3 acres located in Section 33, Township 11 South, Range 24 East in Chaves County, New Mexico. Approximately 55.6 acres are pervious and 1.7 acres are impervious.

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-Roswell'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 is not impaired.

4. Site Map [5.2.2.3, 8.S.5.1]

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

- 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 stormwater inlets (storm drains) and outfalls;
- 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] [5.2.3]

Activities in the area [5.2.3.1] are:

1. Aircraft and Vehicle Fueling and Aircraft De-fueling
2. Ground Vehicle and Equipment Maintenance
3. Aircraft Dismantling, Initial Fluids' and Reusable Parts' Removal
4. Aircraft Dismantling, Final Dismantling and Metal Crushing, and Stockpiling and Storage of Materials
5. Fuel Storage
6. Loading/Unloading
7. Aircraft Maintenance
8. Aircraft Parking
9. Waste Materials' Storage
10. Non-fuel Unused Materials' Storage
11. Ground Vehicle Cleaning
12. Employee/vendor Parking
13. Equipment Storage
14. Snowmelt from Contaminated Snow
15. AerSale-Roswell does not conduct deicing.
16. AerSale-Roswell does not operate a shooting range.
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] [5.2.3.2]

Pollutants that could be exposed to rainfall or snowmelt are associated with the following activities and their areas. These same materials were present in 2017, 2016, and 2015.

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; and industrial storm wattles will be kept around maintenance areas and replaced as necessary.

3. Aircraft Dismantling, Initial Reusable Parts and Fluids' 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; any spills will be cleaned up immediately using dry cleanup methods; and an industrial storm wattle will be placed around the aircraft to filter stormwater runoff.

4. Aircraft Dismantling, Final Dismantling and Metal Crushing, and Stockpiling and Storage of Materials

Potential pollutants are engine oil, aviation hydraulic fluid, battery acid, other oils, brake and transmission fluids, antifreeze, metals, chemical and paint residue. Spills or leaks could occur.

Control measures are: Aircraft will be drained of any remaining fluids prior to dismantling. Dismantling will be conducted on a designated, impervious "Crunch Pad" or in enclosed buildings. If floor drains are present in these buildings, the drains will either drain to City of Roswell sewer system or the drains will be protected from inflow. Lead-acid batteries will be segregated from other scrap materials, placed in properly labeled, good-condition, covered containers in the Used Batteries Facility. Spill kits or absorbent materials will be kept near the Crunch Pads during tear-downs, and any spills will be cleaned up immediately using dry cleanup methods. An industrial storm water wattle be placed around the Crunch Pad and scrap material storage to filter stormwater runoff. The wattle will be replaced as necessary.

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/Unloading

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; 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. An industrial storm water 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 Building 92. 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: Ground vehicle cleaning will be carried out indoors inside Building 66. 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

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, diesel, and de-icing fluids. 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-Roswell does not conduct deicing.

16. AerSale-Roswell does not operate a shooting range

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 in inside enclosed Building 92. 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.

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. Dumpsters will be kept closed. If dumpsters are found to be leaking, leaks will be cleaned up using dry methods. Storm drains will be cleaned out every six (6) months.

II.C. SPILLS AND LEAKS [5.2.3.3]

Spills and leaks could occur in some of the areas noted above. During the last three years – 2017, 2016, and 2015 – no spills or leaks occurred.

II.D. UNAUTHORIZED NON-STORMWATER DISCHARGES [5.2.3.4]

An evaluation of the AerSale-Roswell facility on November 15, 2017 revealed no unauthorized non-stormwater discharges. The criterion used was the presence of discharges other than allowable discharges. Allowable 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 [5.2.3.6]

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.

III. DESCRIPTION OF CONTROL MEASURES TO MEET TECHNOLOGY-BASED AND WATER QUALITY-BASED EFFLUENT LIMITS [5.2.4]

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

AerSale-Roswell is subject to non-numeric technology-based effluent limits. To meet these limits, AerSale-Roswell 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-Roswell 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 operations indoors or, if outdoors, use industrial storm wattles around the maintenance areas, 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;
- Keep all dumpster lids closed when not in use. If dumpsters leak, clean up leaks immediately using dry cleanup methods; 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-Roswell 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;
- Aircraft Dismantling, Initial Reusable Parts and Fluids' Removal areas;
- Aircraft Dismantling, Final Dismantling and Metal Crushing, and Stockpiling and Storage of Materials 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-Roswell will store non-fuel unused materials in totally enclosed facilities. AerSale-Roswell 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.

AerSale-Roswell will dismantle aircraft on a designated Crunch Pad where any residual liquid will be cleaned up using dry methods. An industrial storm wattle will be kept around the Crunch Pad and replaced as necessary.

Finally, AerSale-Roswell 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

AerSale-Roswell 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. Neither is an impaired water body. However, in the event that the Best Management Practices (BMPs) listed herein are not as effective as intended, AerSale-Roswell will utilize industrial storm wattles at the inlet, or at the immediate outlet, of Outfall 001.

IV. SCHEDULES AND PROCEDURES [5.2.5]

IV.A. GOOD HOUSEKEEPING

1. General

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

AerSale-Roswell 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 Areas [8.S.4.1.1]

AerSale-Roswell will minimize the contamination of stormwater runoff from all areas used for aircraft, ground vehicle and equipment maintenance by: performing maintenance activities indoors or if outdoors, keeping industrial storm wattles around the maintenance areas; 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-Roswell 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.

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

AerSale-Roswell 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-Roswell 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-Roswell 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-Roswell 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-Roswell will maintain all control measures and industrial equipment and systems in effective operating condition in order 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-Roswell will inspect and perform preventive maintenance and/or repair on all control measures used to comply with the MSGP:

- 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-Roswell finds that control measures need maintenance, repair, or replacement, AerSale-Roswell will, on the same day the problem is found, take all reasonable steps to prevent discharges until the problem is fixed. AerSale-Roswell 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 B contains the maintenance records.

IV.C. SPILL PREVENTION AND RESPONSE PROCEDURES

1. Actions

AerSale-Roswell 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;
- Develop training on procedures to expeditiously stop, contain, and clean up leaks, spills, and other releases;
- Keep industrial storm wattles around all outdoor maintenance areas and the Crunch Pad;
- Keep spill response carts and other dry-cleaning supplies near areas where spills may occur; and
- Have procedures to notify appropriate AerSale-Roswell personnel.

2. Reporting Hazardous Chemicals' Release

If spills of hazardous materials listed in 40 CFR Part 302 occur in amounts equal to or greater than their reportable quantity, AerSale-Roswell will report such spills to the National Response Center and to local and state authorities.

Attachment C contains the list of hazardous materials and each material's reportable quantity.

Attachment D contains corrective action reports, which reports include records of spills and leaks.

IV.D. EMPLOYEE TRAINING

1. General

AerSale-Roswell 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-Roswell's Stormwater Pollution Prevention Team. AerSale-Roswell will insure that the employees understand the requirements of this permit 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-Roswell 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-Roswell 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 E 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-Roswell 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;
- areas where spills or leaks have occurred during the past three years;
- discharge points (AerSale-Roswell Outfall 001); and
- control measures used to comply with this permit.

At least monthly, during normal working hours, AerSale-Roswell 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
- physical conditions around the AerSale-Roswell Outfall 001.

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

2. Employees Conducting Inspections

AerSale-Roswell 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-Roswell 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: Member of Stormwater Pollution Prevention Team

Secondary: Quality Assurance Manager, Or Designee.

Backup: Disassembly Lead

Backup: Disassembly Lead

3. Record Keeping

AerSale-Roswell 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-Roswell 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-Roswell Outfall 001 and evidence of pollutants in discharges from the AerSale-Roswell 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-Roswell 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-Roswell will include in each Routine Inspection Report a statement signed and certified by AerSale-Roswell General Manager per Section I. of this SWPPP.

Finally, AerSale-Roswell 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 F 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 on an unannounced, “spot” basis. The AerSale-Roswell General Manager will determine when and where these “spot” inspections will occur.

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

1. Schedule

AerSale-Roswell 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-Roswell will collect a sample from the AerSale-Roswell 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: Quality Assurance Manager, Or Designee.

Secondary: Disassembly Lead

Backup: Disassembly Lead

3. Sample Collection and Timing

AerSale-Roswell will collect at least one grab sample from the discharge at the AerSale-Roswell 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-Roswell 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-Roswell will collect the sample as soon as practicable after the first 30 minutes. If the discharge is from snowmelt, AerSale-Roswell will collect the sample(s) any time during the discharge.

4. Sample's Visual Assessment

AerSale-Roswell will make the visual assessment of the sample in a clean, colorless glass or plastic container and examined in a well-lit area. AerSale-Roswell 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

AerSale-Roswell will document each assessment'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 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 IV.B.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-Roswell 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-Roswell could not collect a sample within a designated time frame, the reason why it could not collect that sample.

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

Attachment G contains the Quarterly Visual Assessment reports.

VI. CORRECTIVE ACTIONS AND DEADLINES [4.3] [5.2.5.3]

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

VI.A. IMMEDIATE ACTIONS

1. Timing of Immediate Corrective Action Response

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

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

VI.B. SUBSEQUENT ACTIONS

1. Timing of Subsequent Actions' Response

If AerSale-Roswell 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-Roswell will document in this SWPPP why it is not feasible. AerSale-Roswell 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-Roswell cannot meet the 45-day time frame, it will notify USEPA Region 6 of its intention to exceed the 45 days, its rationale for an extension, and a completion date. AerSale-Roswell 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-Roswell will modify this SWPPP within 14 calendar days after completing the corrective action work.

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

VI.C. CORRECTIVE ACTION RECORD KEEPING [4.4]

AerSale-Roswell 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-Roswell Outfall 001 through stormwater or otherwise; the date AerSale-Roswell 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-Roswell General Manager per Section I. of this SWPPP.

Attachment D contains the corrective action records.

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

VI.D. EFFECT OF CORRECTIVE ACTION [4.5]

AerSale-Roswell 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-Roswell understands also that failing to take corrective action within the required time limits is an additional violation of the MSGP permit.

V.I.E. CONDITIONS REQUIRING SWPPP REVIEW AND REVISION [4.1]

AerSale-Roswell 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 H contains the SWPPP Revisions.

VII. DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER OTHER FEDERAL LAWS

VII.A. DOCUMENTATION REGARDING ENDANGERED AND THREATENED SPECIES [5.2.6.1] [1.1.4.5]

AerSale-Roswell'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-Roswell's "action area," and AerSale-Roswell's industrial activities' discharges and discharge-related activities are not likely to adversely affect threatened or endangered species or critical habitat. AerSale-Roswell has used the Criterion Selection Worksheet in Part E.4 of Appendix E of the MSGP, including completing and submitting to USEPA the Criterion C Eligibility Form.

Attachment I contains the Criterion Selection Worksheet and the Criterion C Eligibility Form.

VII.B. DOCUMENTATION REGARDING HISTORIC PROPERTIES PRESERVATION [5.2.6.2] [1.1.4.6]

The Criterion met is Criterion B; to wit, AerSale-Roswell's discharge-related activities (i.e., construction and/or installation of stormwater control measures that involve subsurface disturbance) will not affect historic properties.

VIII. SIGNATURE REQUIREMENTS [5.2.7][8.S.3.3]

This SWPPP is certified, signed and dated per Section I. of this SWPPP.

IX. REQUIRED SWPPP MODIFICATIONS [5.3]

IX.A. CONDITIONS TRIGGERING MODIFICATION

AerSale-Roswell will modify this SWPPP if any of these conditions occur: construction or a change in design, operation, or maintenance at AerSale-Roswell 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-Roswell will modify this SWPPP within 14 calendar days after completing the corrective action work.

Attachment J contains the SWPPP modifications.

X. SWPPP AVAILABILITY [5.4]

AerSale-Roswell 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-Roswell's permit eligibility, as well as the signed and dated certification page. AerSale-Roswell will ensure that this SWPPP is immediately available to AerSale-Roswell 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.

X.A. SWPPP POSTING ON THE INTERNET [5.4.1]

To comply with the public availability requirements for this SWPPP, AerSale-Roswell will post this SWPPP on its website, <http://www.aersale.com>. To remain current, AerSale-Roswell will also post any SWPPP modifications, records and other reporting elements required for the previous year on its website. AerSale-Roswell will update the SWPPP on its website no later than 45 days after conducting the final routine facility for the year.

X.B. ADDITIONAL DOCUMENTATION REQUIREMENTS [5.5]

AerSale-Roswell will maintain additional information at its Roswell, New Mexico facility: a copy of the NOI submitted to USEPA along with any correspondence exchanged between AerSale-Roswell and USEPA specific to coverage under the MSGP; a copy of the acknowledgment AerSale-Roswell received from USEPA assigning its NPDES ID; a copy of the MSGP; 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; all inspection reports, including the Routine Facility Inspection Reports and the Quarterly Visual Inspection Reports; any deviation from the schedule for visual assessments and/or monitoring and the reason for the deviation; and the corrective action documentation.

Attachment K 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-Roswell will submit the annual report using USEPA's NeT reporting tool.

XI.B. ANNUAL REPORT

1. Deadline and Reporting Period

AerSale-Roswell 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.

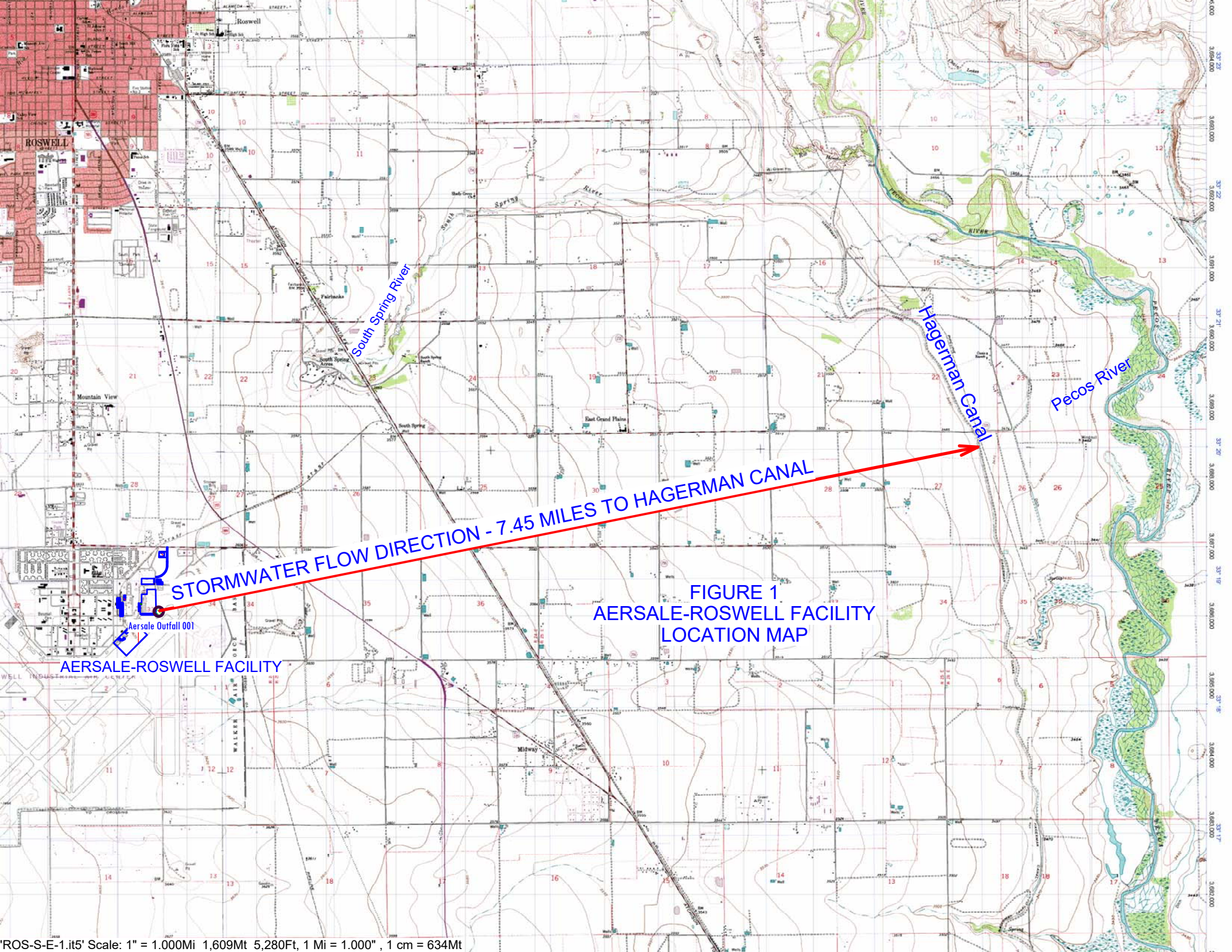
2. Contents of Report

AerSale-Roswell will include in the annual report the following information.

- a. A summary of the past year's Routine Inspection reports. [3.1.2]
- b. A statement signed and certified by the AerSale-Roswell General Manager, that AerSale-Roswell conducted no pavement deicing and used no urea.
- c. A summary of the past year's Quarterly Visual Assessment reports. [3.2.2]
- d. A summary of the past year's Corrective Action reports. [4.4] If corrective action is not yet completed by the annual report's submission time, AerSale-Roswell will describe the status of any outstanding corrective action(s).
- e. A description of any incidents of noncompliance, of, if none, a statement that AerSale-Roswell is in compliance.
- f. A statement, signed and dated by the AerSale-Roswell General Manager, saying the following. [Appendix A, Subsection B.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 L contains the Annual Report.



STORMWATER FLOW DIRECTION - 7.45 MILES TO HAGERMAN CANAL

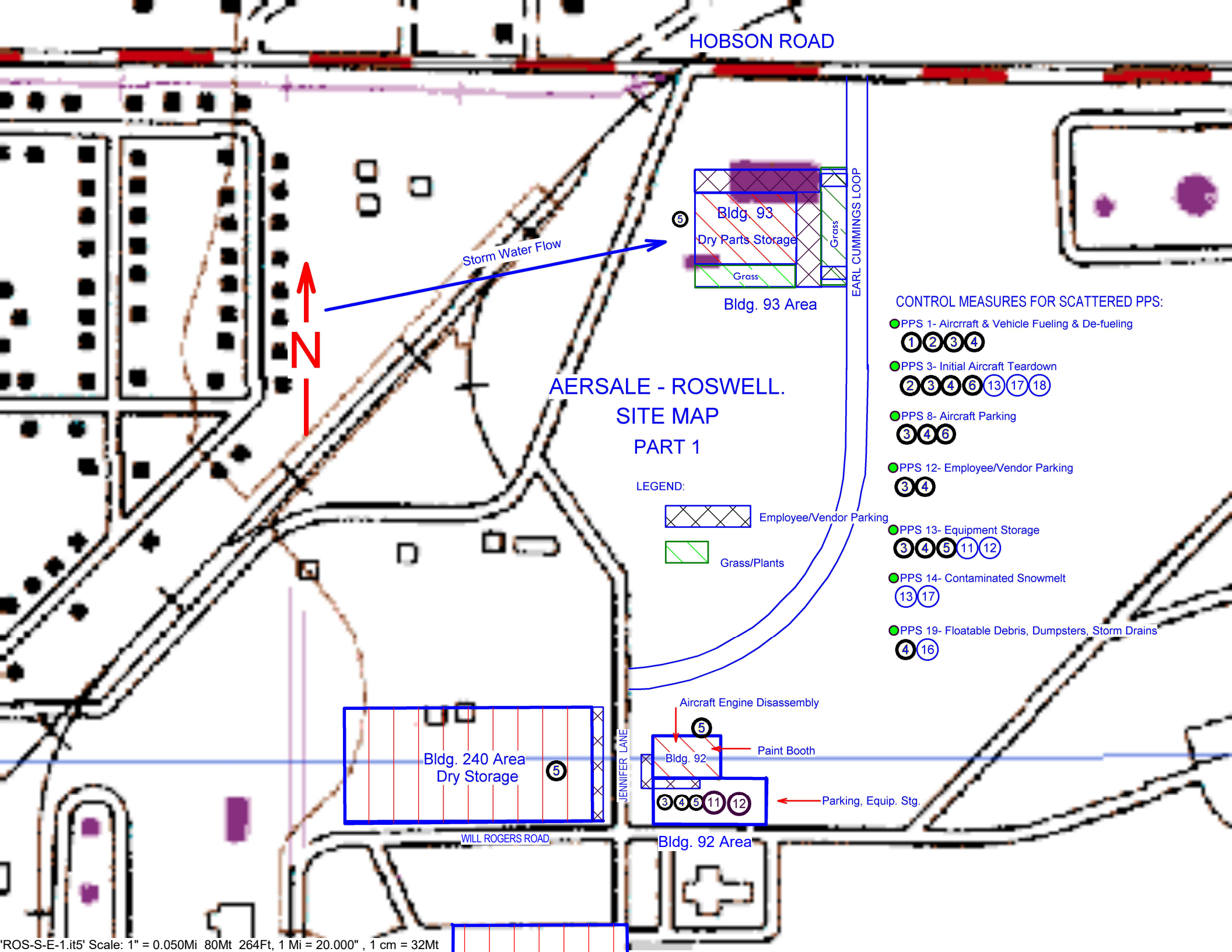
FIGURE 1
AERSALE-ROSWELL FACILITY
LOCATION MAP

AERSALE-ROSWELL FACILITY

Aersale Outfall 001

FIGURE 2

SITE MAP



HOBSON ROAD

EARL CUMMINGS LOOP

⑤

Bldg. 93
Dry Parts Storage

Bldg. 93 Area

Storm Water Flow

↑
N

AERSALE - ROSWELL.
SITE MAP
PART 1

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

Bldg. 240 Area
Dry Storage

⑤

Aircraft Engine Disassembly

⑤

Bldg. 92

Paint Booth

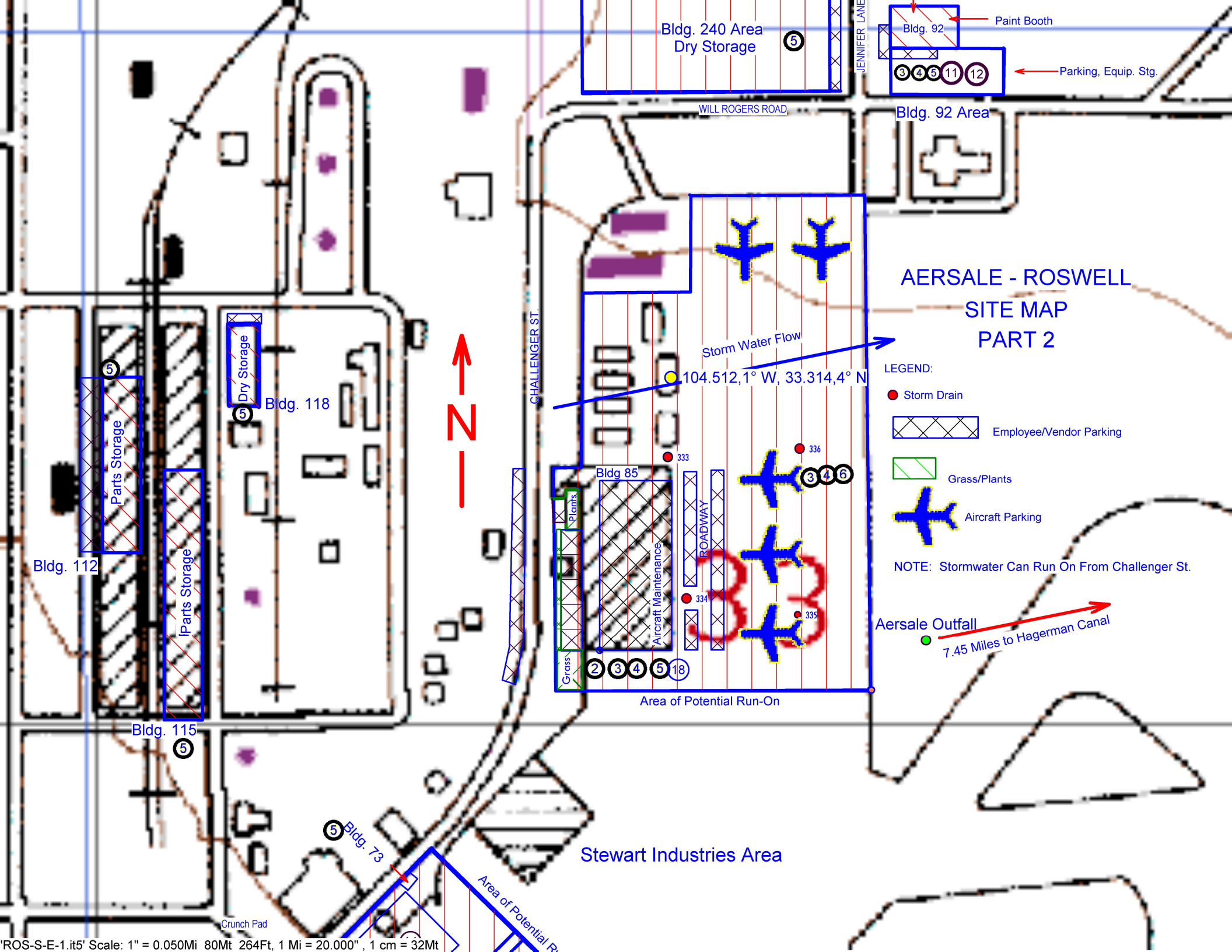
③ ④ ⑤ ⑪ ⑫

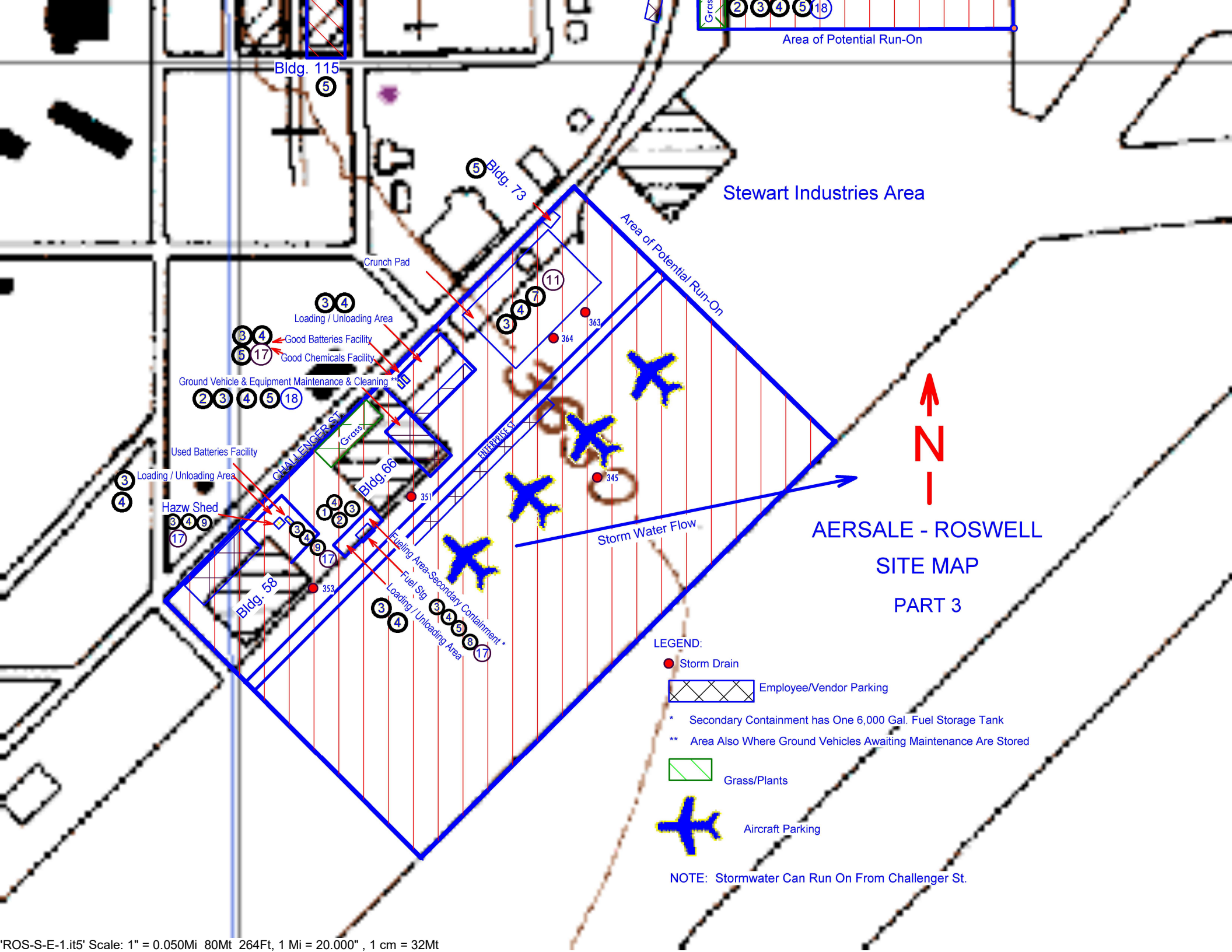
Parking, Equip. Stg.

Bldg. 92 Area

WILL ROGERS ROAD

JENNIFER LANE





Bldg. 115

5

Bldg. 73

Stewart Industries Area

Crunch Pad

Loading / Unloading Area

Good Batteries Facility

Good Chemicals Facility

Ground Vehicle & Equipment Maintenance & Cleaning **

Used Batteries Facility

Loading / Unloading Area

Hazw Shed

Bldg. 58

Bldg. 66

Fueling Area-Secondary Containment *

Fuel Sig

Loading / Unloading Area

Area of Potential Run-On

Storm Water Flow

N

AERSALE - ROSWELL SITE MAP PART 3

LEGEND:



Storm Drain



Employee/Vendor Parking

* Secondary Containment has One 6,000 Gal. Fuel Storage Tank

** Area Also Where Ground Vehicles Awaiting Maintenance Are Stored



Grass/Plants



Aircraft Parking

NOTE: Stormwater Can Run On From Challenger St.

ATTACHMENT A

SWPPP CERTIFICATION

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.

Name: Randy Phelps

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

Signature: _____

Date: _____

ATTACHMENT B

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		<input type="checkbox"/> Regular Maintenance	<input type="checkbox"/> Problem Discovered
If problem, describe action required:			
Control fully functioning within 14 calendar days?		<input type="checkbox"/> Yes	<input type="checkbox"/> 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?		<input type="checkbox"/> Yes	<input type="checkbox"/> No Date Completed:
45-Day Extension - provide rationale sent to USEPA for extension of 45-day timeframe:			
Corrective Action Completed?	<input type="checkbox"/> Yes	<input type="checkbox"/> 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		<input type="checkbox"/> Regular Maintenance	<input type="checkbox"/> Problem Discovered
If problem, describe action required:			
Control fully functioning within 14 calendar days?		<input type="checkbox"/> Yes	<input type="checkbox"/> 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?		<input type="checkbox"/> Yes	<input type="checkbox"/> No Date Completed:
45-Day Extension - provide rationale sent to USEPA for extension of 45-day timeframe:			
Control fully functioning?	<input type="checkbox"/> Yes	<input type="checkbox"/> 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		<input type="checkbox"/> Regular Maintenance	<input type="checkbox"/> Problem Discovered

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 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 C

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 D

CORRECTIVE ACTION REPORTS

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?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
Immediate Actions Taken:				
<u>Immediate</u> 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?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
			Date Completed:	
Actions Taken Within 14 Days:				
If additional corrective actions needed, complete actions before next storm event, if possible, and within <u>14 calendar days</u> from date found.				
Corrective Action Completed?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	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?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
			Date Completed:	
45-Day Extension - provide rationale sent to USEPA for extension of 45-day timeframe:				
Corrective Action Completed?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	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 E

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:	
<input type="checkbox"/>	<input type="checkbox"/>	Overview of what is in the SWPPP	
<input type="checkbox"/>	<input type="checkbox"/>	Spill response procedures, good housekeeping, maintenance requirements, and material management practices	
<input type="checkbox"/>	<input type="checkbox"/>	Location of all permit-required controls and how such controls are to be maintained	
<input type="checkbox"/>	<input type="checkbox"/>	Proper procedures to follow with respect to the permit's pollution prevention requirements	
<input type="checkbox"/>	<input type="checkbox"/>	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:	
<input type="checkbox"/>	<input type="checkbox"/>	Overview of what is in the SWPPP	
<input type="checkbox"/>	<input type="checkbox"/>	Spill response procedures, good housekeeping, maintenance requirements, and material management practices	
<input type="checkbox"/>	<input type="checkbox"/>	Location of all permit-required controls and how such controls are to be maintained	
<input type="checkbox"/>	<input type="checkbox"/>	Proper procedures to follow with respect to the permit's pollution prevention requirements	
<input type="checkbox"/>	<input type="checkbox"/>	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 F

ROUTINE INSPECTION REPORTS AND CREDENTIALS OF QUALIFIED INSPECTORS

	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	Tear down on designated Crunch Pad
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 Dismantling, Initial Removal of Reusable Parts and Fluids		X	X	X		X	
4	Aircraft Dismantling, Final Dismantling, Metal Crushing, and Materials' Stockpiling and Storage			X	X	X		X
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 & Bldg. 92			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 - Bldg. 92					X		
19	AerSale-Wide Activities: Floatable Debris, Dumpsters, Storm Drains				X			

	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 Dismantling, Initial Removal of Reusable Parts and Fluids					X	
4	Aircraft Dismantling, Final Dismantling, Metal Crushing, and Materials' Stockpiling and Storage			X			
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 & Bldg. 92						
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 - Bldg. 92						
19	AerSale-Wide Activities: Floatable Debris, Dumpsters, Storm Drains						

	CONTROL MEASURE NO. ON SITE MAP	16	17	18	19
		Remove floatable debris to dumpsters. Keep dumpsters closed. 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, maintenance area, and/or Crunch Pad	Lead-acid batteries segregated & placed in closed containers in Waste Materials' storage areas or enclosed sheds
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 Dismantling, Initial Removal of Reusable Parts and Fluids		X	X	
4	Aircraft Dismantling, Final Dismantling, Metal Crushing, and Materials' Stockpiling and Storage		X	X	X
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 & Bldg. 92		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 - Bldg. 92				
19	AerSale-Wide Activities: Floatable Debris, Dumpsters, Storm Drains	X			

AERSALE-ROSWELL - ROUTINE QUARTERLY INSPECTION REPORT

PREVIOUS ISSUES

Any previously unidentified pollutant discharges since the last inspection?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, describe:		
Any discharges occurring at time of inspection?	<input type="checkbox"/> Yes	<input type="checkbox"/> 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:	<input type="checkbox"/>	Clear	<input type="checkbox"/>	Cloudy	<input type="checkbox"/>	Rain	<input type="checkbox"/>	Sleet
<input type="checkbox"/> Fog	<input type="checkbox"/>	Snow	<input type="checkbox"/>	High Winds	<input type="checkbox"/>	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	Yes	No	N/A	Addressed
1	Aircraft and vehicle fueling and aircraft de-fueling				
CM 1	Fueling operations (incl. tank trucks) conducted on impervious pad?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 2	Drip pans used where fuel leaks or spills can occur & where making or breaking hose connections?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PPS #	Potential Pollutant Source	Yes	No	N/A	Addressed
2	Ground vehicle and equipment maintenance				
CM 2	Drip pans used where fuel leaks or spills can occur & where making or breaking hose connections?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 18	Good-condition Industrial Storm Wattle around maintenance area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

AERSALE-ROSWELL - ROUTINE QUARTERLY INSPECTION REPORT

PPS #	Potential Pollutant Source	Yes	No	N/A	Addressed
3	Aircraft dismantling, initial reusable parts' & fluids' removal				
CM 2	Drip pans used where fuel leaks or spills can occur & where making or breaking hose connections?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 6	Absorbent pads or other absorbent material under engines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 13	Fluids collected immediately & stored in closed containers in Waste Materials' storage areas or in fuel-recycling areas for resale?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 17	All containers in good condition & clearly and accurately labeled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 18	Good-condition Industrial Storm Wattle around aircraft?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PPS #	Potential Pollutant Source	Yes	No	N/A	Addressed
4	Aircraft dismantling, final dismantling, metal crushing, & materials' stockpiling & storage				
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 7	Tear down on designated crunch pad?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 11	Drained of all fluids prior to activity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 17	All containers in good condition & clearly and accurately labeled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 18	Good-condition Industrial Storm Wattle around crunch pad & scrap-material storage area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 19	Lead-acid batteries segregated & stored in closed containers in Waste Materials' storage areas or in enclosed sheds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PPS #	Potential Pollutant Source	Yes	No	N/A	Addressed
5	Fuel storage				
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 8	Stored in designated fueling areas on impervious surfaces with secondary containment or stored on vehicles?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 17	All containers in good condition & clearly and accurately labeled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PPS #	Potential Pollutant Source	Yes	No	N/A	Addressed
6	Loading/Unloading				
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PPS #	Potential Pollutant Source	Yes	No	N/A	Addressed
7	Aircraft maintenance				
CM 2	Drip pans used where fuel leaks or spills can occur & where making or breaking hose connections?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 18	Good-condition Industrial Storm Wattle around aircraft?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

AERSALE-ROSWELL - ROUTINE QUARTERLY INSPECTION REPORT

PPS #	Potential Pollutant Source						
8	Aircraft parking	Yes	No	N/A	Addressed		
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 6	Absorbent pads or other absorbent material under engines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
PPS #	Potential Pollutant Source						
9	Waste materials' storage	Yes	No	N/A	Addressed		
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 9	Stored on impervious surface in closed containers, totally enclosed sheds, or covered lean-tos, all protected from rainfall and snowfall?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 17	All containers in good condition & clearly and accurately labeled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
PPS #	Potential Pollutant Source						
10	Non-fuel unused materials' storage	Yes	No	N/A	Addressed		
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 17	All containers in good condition & clearly and accurately labeled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
PPS #	Potential Pollutant Source						
12	Employee/vendor parking	Yes	No	N/A	Addressed		
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
PPS #	Potential Pollutant Source						
13	Equipment storage	Yes	No	N/A	Addressed		
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 11	Drained of all fluids prior to storage?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 12	If outdoors, stored covered & on pallets or enclosed in plastic?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CM 17	Containers in good condition & clearly & accurately labeled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

AERSALE-ROSWELL - ROUTINE QUARTERLY INSPECTION REPORT

PPS #	Potential Pollutant Source	Yes	No	N/A	Addressed
17	Aircraft, ground vehicle, and equipment awaiting maintenance				
CM 3	Spill kits or absorbent materials kept nearby?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 6	Absorbent pads or other absorbent material under engines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 14	Activity in designated, impervious area only?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PPS #	Potential Pollutant Source	Yes	No	N/A	Addressed
18	Painting				
CM 5	Activity indoors with no floor drains, floor drains to sewer, or protected unknown drains?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PPS #	Potential Pollutant Source	Yes	No	N/A	Addressed
19	AerSale-wide activities: floatable debris, dumpsters, storm drains				
CM 4	Spills/leaks cleaned up immediately using dry methods?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CM 15	Floatable debris removed to dumpsters, dumpsters kept closed? Storm drains cleaned out every 6 months? Date last cleaned out storm drains:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

AERSALE-ROSWELL - ROUTINE QUARTERLY INSPECTION REPORT

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 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 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 G

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 rainfull or snow 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	
Petroleum/Gas		Solvents		Other (Describe):					
Clarity:		Clear		Sightly Cloudy		Cloudy		Opaque	
Floating Solids:		No		Yes (Describe):					
Settled Solids (after sample sits approx. 30 minutes):				No		Yes (Describe):			
Suspended Solids:				No		Yes (Describe):			
Foam (gently shake sample):				No		Yes (Describe):			
Oil Sheen:		None		Flecks		Globs		Sheen	
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 H
SWPPP REVISIONS

ATTACHMENT I

ENDANGERED AND THREATENED SPECIES: CRITERION SELECTION WORKSHEET
AND CRITERION C ELIGIBILITY FORM

Criterion E. Your industrial activities are the subject of a permit under section 10 of the ESA, and this authorization addresses the effects of your facility's discharges and discharge-related activities on federally listed species and designated critical habitat. To certify your eligibility under this criterion, you must use the *Criterion Selection Worksheet* in Part E.4 of Appendix E. You must also provide supporting documentation for your determination in your NOI and SWPPP, including a copy of the permit from the Services.

E.3 Eligibility Compliance

You must comply with any measures that formed the basis of your eligibility determination in Part 1.1.4.5 for the duration of your coverage under the MSGP in order to maintain your eligibility for coverage under the permit. These measures become permit requirements per Part 2.3. Documentation of these measures must be kept as part of your SWPPP (see Part 5.2.6.1).

E.4 Criterion Selection Worksheet

Instructions:

You must follow the step-by-step instructions in this worksheet in order to determine your eligibility under the Part 1.1.4.5 criteria. Alternatively, if you prefer to use a Biological Evaluation (or its equivalent) in making a determination of your eligibility, you should ensure all of the information requested below for the criterion you are selecting is fully addressed in such a document. You must attach this completed document or Biological Evaluation (or equivalent) to your SWPPP to support your Part 1.1.4.5 eligibility determination.

You may need the following information in order to determine your eligibility:

- 1) Your facility's draft Stormwater Pollution Prevention Plan (SWPPP), including information on receiving waters.
- 2) Any additional site-specific information related to your facility's discharges and discharge-related activities.
- 3) The list(s) of endangered and threatened species and any designated critical habitat in your action area, as acquired from the Fish and Wildlife Service and/or the National Marine Fisheries Services. Directions on how to acquire species lists is described in a subsequent section below.

Note that much of the information needed to complete this worksheet is also needed in order to prepare your NOI for permit coverage, and is also information that you must develop as part of your SWPPP. You may copy and paste any information that is already required and completed in your SWPPP into this worksheet. (You may also decide to make minor changes or additions to your SWPPP while filling out the worksheet for clarification purposes or to address any concerns that are identified below.)

STEP 1: DETERMINE IF THE ELIGIBILITY REQUIREMENTS OF CRITERION B, D, OR E CAN BE MET.

- A. You should first determine whether you are eligible under [criterion B](#) (because another operator has accounted for your action area in their valid certification of eligibility under the 2015 MSGP), [criterion D](#) (because of a previously completed ESA section 7 consultation), or [criterion E](#) (because of a previously issued ESA section 10 permit).

- B. If your facility is likely to be eligible under criterion B, D or E, you may skip ahead to the applicable criterion's requirements to determine if you are eligible. If after completing the relevant section you find that your facility does not in fact meet criteria B, D, or E (e.g., due to difference in action area described, lack of analysis of appropriate effects, new listings or designation of critical habitat), proceed to [Step 2](#) below.
- C. If your facility is not likely to be eligible under criterion B, D or E, you may proceed directly to [Step 2](#).

Criterion B Eligibility Requirements

If your industrial activities were already addressed in another operator's valid certification of eligibility under the current 2015 MSGP, you may be eligible for coverage under criterion B. In order to be eligible for coverage under criterion B, you must confirm that all the following are true:

- ☐ You have confirmed that the other operator's certification of eligibility accounted for your action area and that the eligibility determination was valid.
- ☐ There has been no lapse of NPDES permit coverage in the other operator's certification.
- ☐ You will comply with all measures that formed the basis of the other operator's valid certification of eligibility. List any measures here (or enter "N/A" if none exist):

- **If all of the above are true, you may select criterion B on your NOI.** You must include in your NOI the NPDES ID assigned to the other operator's authorization under this permit, and a description of the basis for the criterion selected on your NOI form, including the eligibility criterion selected by the other operator's certification. You must include this completed worksheet in your SWPPP.
- **If any of the above are not true, you may not select criterion B and must proceed to [Step 2](#).** For example, if there are any listed species in your action area that were not addressed in the other operator's certification, you are not eligible under criterion B.

Criterion D Eligibility Requirements

If consultation under section 7 of the ESA has been concluded, you may be eligible for coverage under criterion D. In order to be eligible for coverage under criterion D, you must confirm that all the following are true:

- ☐ A consultation between a federal agency and the U.S. Fish and Wildlife Service and/or the National Marine Fisheries Service under section 7 of the ESA has been concluded. Consultations can be either formal or informal, and would have occurred only as a result of a separate federal action (e.g., during application for an individual wastewater discharge permit or the issuance of a wetlands dredge and fill permit), and the consultation must have addressed the effects of your industrial activity's discharges and discharge-related activities on all federally listed threatened or endangered species and all designated critical habitat in your action area. The result of this consultation must be either:

- **If the above is true, you may select criterion E on your NOI.** You must also provide a description of the basis for the criterion selected on your NOI form and must include this completed worksheet in your SWPPP. In both your SWPPP and your NOI you must provide a copy of the section 10 permit issued by the Services.
- **If the above is not true, you may not select criterion E and must proceed to [Step 2](#).** For example, if a permit has been issued under section 10 of the ESA, but the permit authorization did not address the effects of your facility's discharges and/or discharge-related activities on all federally-listed species and designated critical habitat in your action area, you are not eligible under criterion E, but you should attach a copy of the permit to the SWPPP for reference.

STEP 2: DETERMINE THE EXTENT OF YOUR ACTION AREA

You must determine whether species listed as either threatened or endangered, or their critical habitat(s) (see definitions of these terms in Appendix A), are located in your facility's action area (i.e., all areas to be affected directly or indirectly by the federal 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 allowable non-stormwater discharges). Consider the following in determining the action area for your facility:

- Discharges of pollutants into downstream areas can expand the action area well beyond the footprint of your facility and the discharge point(s). Take into account the controls you 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. All receiving waterbodies that could receive pollutants from your facility must be included in your action area.
- Discharge-related activities must also be accounted for in determining your action area. Discharge-related activities are any activities that cause, contribute to, or result in stormwater and allowable 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. For example, 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 your action area.

If you have any questions about determining the extent of your action area, you may contact EPA or the Services for assistance.

You must include a map **and a written description of** the action area of your facility in [Attachment 1](#) of this appendix. You may choose to include the map that is generated from the FWS' on-line mapping tool IPaC (the *Information, Planning, and Consultation System*) located at <http://ecos.fws.gov/ipac/> (see [Step 3](#) for information about using this tool).

You must proceed to [Step 3](#) below.

STEP 3: DETERMINE IF LISTED THREATENED OR ENDANGERED SPECIES AND/OR CRITICAL HABITAT ARE PRESENT IN YOUR ACTION AREA.

You must determine whether species listed as either threatened or endangered under the Endangered Species Act (ESA), and/or their designated critical habitat(s)^b, are located in your facility's action area. Federally listed species and designated critical habitat are under the purview of the National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (FWS) (together, "Services"), and in many cases, species and critical habitat lists will need to be acquired from both Services.

^b See definitions of these terms in Appendix A of the MSGP.

- For NMFS species and critical habitat information, use the following webpages, which provide up-to-date information on listed species (<http://www.nmfs.noaa.gov/pr/species/esa/>) and critical habitat (<http://www.nmfs.noaa.gov/pr/species/criticalhabitat.htm>). To determine the field office that corresponds to your facility, go to <http://www.nmfs.noaa.gov/> (under the left tab for "Regions"). For NMFS species in the Greater Atlantic Region, go to <http://www.greateratlantic.fisheries.noaa.gov/protected/section7/guidance/maps/index.html>.
- For FWS species information, use the on-line mapping tool IPaC (the *Information, Planning, and Consultation System*) located at <http://ecos.fws.gov/ipac/>, and follow these steps:
 - Select *Get Started*.
 - Select *Enter Project Location*
 - Use an address, city name or other location to zoom into your project area
 - Use the zoom feature to see the entire extent of your action area on the screen.
 - Use one of the mapping features (e.g., Polygon or line feature) to draw your action.
 - For the aquatic portion of your action area, trace the waterbody(ies) with the tool to characterize your action area.
 - If your proposal will include any upland activities (i.e., discharge-related activities), or if there is some aspect of your discharge that would potentially result in effects to terrestrial species, include the corresponding upland areas within your action area.
 - When you are done, press *Continue*.
 - Select *Request an Official Species List*
 - Complete the fields on the Official Species List Request page, and include "(MSGP)" at the end of the project description.
 - For Classification, select "Water Quality Modification".
 - Select the appropriate requesting agency/organization type (for most applicants, this should be "Other").
 - Submit the request to acquire an Official Species List, which should show both listed species as well as any designated critical habitat that are present in the action area in the previous step.
 - Note: If a link to an Official Species List is not available on the page, follow the web link of the office(s) indicated, or contact the office directly by mail or phone if a web link is not shown.

The principle authority for critical habitat designations and associated requirements is found at 50 CFR Parts 17 and 226. See <http://www.access.gpo.gov>.

Attach a copy of the species and critical habitat list(s) from the Service(s) to [Attachment 2](#) of this appendix and use the list(s) to complete the rest of this worksheet. For FWS species, include the full printout from your IPaC query/Official Species List in Attachment 2. You can include the map from your IPaC query in Attachment 1.

If after following the steps you have determined that there are no listed species and/or designated critical habitat in your action area, you may be eligible for coverage under [criterion A](#).

If you have determined that there are or may be listed species and/or designated critical habitat in your action area, you are not eligible under criterion A and must proceed to [Step 4](#) below.

Criterion A Eligibility Requirements

In order to be eligible for coverage under criterion A, you must confirm that the following is true:

☐ I have confirmed there to be no listed species and no critical habitat in my action area.

- **If the above is true, you may select criterion A on your NOI form.** You must also provide a description of the basis for the criterion selected on your NOI form. You must include this completed worksheet in your SWPPP. *Note: If your Official Species List from the USFWS indicated no species or critical habitat were present in your action area, include the full consultation tracking code at the top of your Official Species List in your NOI submittal in the question "Provide a brief summary of the basis for the criterion selected in Appendix E." If an Official Species List was not available on IPaC, list the contact date and name of the Service staff with whom you corresponded to verify no USFWS species or critical habitat were present in your action area.*
- If the above is not true, you may not select criterion A and must proceed to [Step 4](#) to determine if you can become eligible under criterion C.

Note: For existing dischargers that have previously obtained coverage under criterion A, you must verify whether listed species and/or critical habitat are expected to exist in your action area, as described above. Please note that if you now find that your action area overlaps with listed species or critical habitat, you must proceed to [Step 4](#).

STEP 4: DETERMINE IF YOUR INDUSTRIAL FACILITY'S DISCHARGES OR DISCHARGE-RELATED ACTIVITIES ARE LIKELY TO ADVERSELY AFFECT LISTED THREATENED OR ENDANGERED SPECIES OR DESIGNATED CRITICAL HABITAT AND ANY MEASURES THAT MUST BE IMPLEMENTED TO AVOID ADVERSE EFFECTS

If in Step 3 you determined that listed species and/or designated critical habitat could exist in your action area, you must next assess whether your discharges and discharge-related activities are likely to adversely affect listed threatened or endangered species or designated 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 attached [Criterion C Eligibility Form](#) and must submit this form to EPA a minimum of 30 days prior to filing your NOI for permit coverage. After you submit your [Criterion C Eligibility Form](#), you may be contacted by EPA with additional measures that you must implement in order to ensure your eligibility under criterion C.

Criterion C Eligibility Form

Instructions:

In order to be eligible for coverage under criterion C, you must complete the following form and you must submit it to EPA following the instructions in Section VII a **minimum of 30 days prior to filing your NOI for permit coverage**. After you submit your form, you may be contacted by EPA with additional measures (e.g., additional stormwater controls or modifications to your discharge-related activities) that you must implement in order to ensure your eligibility under criterion C.

If after completing this worksheet you cannot make a determination that your discharges and discharge-related activities are not likely to adversely affect listed threatened or endangered species or designated critical habitat, you must submit this completed worksheet to EPA, and you may not file your NOI for permit coverage until you receive a determination from EPA that your discharges and/or discharge-related activities are not likely to adversely affect listed species and critical habitat.

Note: Much of the information needed for this form can be obtained from your draft SWPPP which will be needed when you file your NOI.

SECTION I. OPERATOR, FACILITY, AND SITE LOCATION INFORMATION.

1) Operator Information

a) **Operator Name:** AerSale, Inc., Roswell, NM Facility [AerSale-Roswell]

b) **Point of Contact**

First Name: Randy **Last Name:** Phelps

Phone Number: 575-624-3140, Ext. 3316

E-mail: randy.phelps@aersale.com

2) Facility Information

a) **Facility Name:** AerSale, Inc., Roswell, NM Facility

b) **Check which of the following applies:**

☒ I am seeking coverage under the MSGP as a new discharger or as a new source

☐ I am seeking coverage under the MSGP as an existing discharger and my facility has modifications to its discharge characteristics (e.g., changes in discharge flow or area drained, different pollutants) and/or discharge-related activities (e.g., stormwater controls)

Indicate the number of years the facility has been in operation: _____ years

Provide your NPDES ID (i.e., permit tracking number) from your previous MSGP coverage: _____

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

Indicate the number of year the facility has been in operation: _____ years

Provide your NPDES ID (i.e., permit tracking number) from your previous MSGP coverage: _____

c) Facility Address:

Address 1: 703 E. Challenger Street

Address 2: _____

City: Roswell State: NM Zip Code: 88203

d) Identify the primary industrial sector to be covered under the 2015 MSGP:

SIC Code 4581 or Primary Activity Code _____

Sector S and Subsector S1

e) Identify the sectors of any co-located activities to be covered under the 201r MSGP:

Sector N Subsector N1

Sector _____ Subsector _____

Sector _____ Subsector _____

Sector _____ Subsector _____

Sector _____ Subsector _____

Sector _____ Subsector _____

f) Estimated area of industrial activity exposed to stormwater: 37.6 acres

g) Provide a general description of the industrial activities that are taking place at this facility:

Aircraft maintenance, fueling, de-fueling, storage, and dismantling; ground vehicle maintenance, cleaning, and fueling; general painting

3) Receiving Waters Information

List all the stormwater outfalls from your facility.				For each outfall, provide the following receiving water information:	
Outfall ID	Design Capacity (if known)	Latitude (decimal degrees)	Longitude (decimal degrees)	Name of the receiving water that receives stormwater from the outfall and/or from the MS4 that the outfall discharges to	Type of Waterbody (e.g., lake, pond, river/stream/creek, estuarine/marine water)
001		<u>_ 3 3 . 3 1 2 7</u>	<u>1 0 4 . 5 1 0 1</u>	Hagerman Canal-Pecos River	Canal feeds into river
		<u>--- ' ---</u>	<u>--- ' ---</u>		
		<u>--- ' ---</u>	<u>--- ' ---</u>		
		<u>--- ' ---</u>	<u>--- ' ---</u>		
		<u>--- ' ---</u>	<u>--- ' ---</u>		

SECTION II. ACTION AREA

Ensure that your action area is described in [Attachment 1](#), as required in [Step 2](#).

SECTION III. LISTED SPECIES AND CRITICAL HABITAT LIST

Ensure that the listed species and critical habitat list is included in [Attachment 2](#), as required in [Step 3](#).

Review your species list in Attachment 2, choose one of the following three statements, and follow the corresponding instructions:

☐ The species list includes only terrestrial species and/or their designated critical habitat. No aquatic or aquatic-dependent species or their critical habitat are present in the action area. **You may skip to [Section IV](#) of this form. You are not required to fill out [Section V](#).**

☐ The species list includes only aquatic and/or aquatic-dependent species and/or their designated critical habitat. No terrestrial species or their critical habitat are present in the action area. **You may skip to [Section V](#) of this form and are not required to fill out [Section IV](#).**

☒ The species list includes both terrestrial and aquatic or aquatic-dependent species and/or their designated critical habitat. **You must fill out both [Sections IV](#) and [V](#) of this form.**

Note: For the purposes of this permit, "terrestrial species" would not include animal or plant species that 1) spends any portion of its life cycle in a waterbody or wetland, or 2) if an animal, depends on prey or habitat that occurs in a waterbody or wetland. For example, shorebirds, wading birds, amphibians, and certain reptiles would not be considered terrestrial species under this definition. Please also be aware that some terrestrial animals (e.g., certain insects, amphibians) may have an aquatic egg or larval/juvenile phase.

SECTION IV. EVALUATION OF DISCHARGE-RELATED ACTIVITIES EFFECTS

Note: You are only required to fill out this section if your facility's action area contains terrestrial species and/or their designated critical habitat. If your action area only contains aquatic and/or aquatic-dependent species and/or their designated critical habitat, you can skip directly to [Section V](#).

Most of the potential effects related to coverage under the MSGP are assumed to occur to aquatic and/or aquatic-dependent species. However, in some cases, potential effects to terrestrial species and/or their critical habitat should be considered as well from any discharge-related activities that occur during coverage under the MSGP. Examples of discharge-related activities that could have potential effects on listed terrestrial species or their critical habitat include the storage of materials and land disturbances associated with stormwater management-related activities (e.g., the installation or placement of stormwater control measures).

A. Select the applicable statement(s) below and follow the corresponding instructions:

☐ There are no discharge-related activities that are planned to occur during my coverage under the MSGP. You can conclude that your discharge-related activities will have no likely adverse effects, and:

- If there are any aquatic or aquatic-dependent species and/or their critical habitat in your action area, you must skip to [Section V](#), *Evaluation of Discharge Effects*, below.
- If there are no aquatic or aquatic-dependent species you may skip to [Section VI](#) and verify that your activities will have no likely adverse effects. You must submit this form to EPA as specified in [Section VII](#) of this form. You may select criterion C on your NOI form and may submit your NOI for permit coverage 30 days after you have submitted this *Criterion C Eligibility Form*. You must also provide a description of the basis for the criterion you selected on your NOI form, **including the species and critical habitat list(s) in your action area**, as well as any other documentation supporting your eligibility. You must also include this completed *Criterion C Eligibility Form* in your SWPPP.

☒ There are discharge-related activities planned as part of the proposal. Describe your discharge-related activities in the following box and continue to (b) below.

Describe discharge-related activities:

Stormwater discharge that, due to controls outlined below and in the SWPPP, includes no pollutants.

B. In order to ensure any discharge-related activities will have no likely adverse effects on listed species and/or their designated critical habitat, you must certify that all the following are true:

☒ Discharge-related activities will occur:

- on previously cleared/developed areas of the site where maintenance and operation of the facility are currently occurring or where existing conditions of the area(s) in which the discharge-related activities will occur precludes its use by listed species (e.g., work on existing impervious surfaces, work occurring inside buildings, area is not used by species), and
- if discharge-related activities will include the establishment of structures (including, but not limited to, infiltration ponds and other controls) or any related disturbances, these structures and/or disturbances will be sited in areas that will not result in isolation or degradation of nesting, breeding, or foraging habitat or other habitat functions for listed animal species (or their designated critical habitat), and will avoid the destruction of native vegetation (including listed plant species).

☒ If vegetation removal (e.g., brush clearing) or other similar activities will occur, no terrestrial listed species that use these areas for habitat would be expected to be present during vegetation removal.

If all the above are true, you can conclude that your discharge-related activities will have no likely adverse effects, and:

- If there are any aquatic or aquatic-dependent species and/or critical habitat in your action area, you must skip to [Section V](#), *Evaluation of Discharge Effects*, below.
- If there are no aquatic or aquatic-dependent species you may skip to [Section VI](#) and verify that your activities will have no likely adverse effects. You must submit this form to EPA as specified in [Section VII](#) of this form. You may select criterion C on your NOI and may submit your NOI for permit coverage 30 days after you have submitted this completed form. You must also provide a description of the basis for the criterion you selected on your NOI form, **including the species and critical habitat list(s)**, and any other documentation supporting your eligibility. You must also include this completed *Criterion C Eligibility Form* in your SWPPP.
- **If any of the above are not true**, you cannot conclude that your discharge-related activities will have no likely adverse effects. You must complete the rest of this form (if applicable), and must submit the form to EPA for assistance in determining your eligibility for coverage.

SECTION V. EVALUATION OF DISCHARGE EFFECTS

Note: You are only required to fill out this section if your facility's action area includes aquatic and/or aquatic-dependent species and/or their critical habitat.

In this section, you will evaluate the likelihood of adverse effects from your facility's discharges. The scope of effects to consider will vary with each facility and species/critical habitat characteristics. The following are examples of discharge effects you should consider:

- **Hydrological Effects.** Stormwater discharges may adversely affect receiving waters from pollutant parameters such as turbidity, temperature, salinity, or pH. These effects will vary with the amount of stormwater discharged and the volume and condition of the receiving water. Where a stormwater discharge constitutes a minute portion of the total volume of the receiving water, adverse hydrological effects are less likely.
- **Toxicity of Pollutants.** Pollutants in stormwater may have toxic effects on listed species and may adversely affect critical habitat. Exceedances of benchmarks, effluent limitation guidelines, or state or tribal water quality requirements may be indicative of potential adverse effects on listed species or critical habitat. However, some listed species may be adversely affected at pollutant concentrations below benchmarks, effluent limitation guidelines, and state or tribal water quality standards. In addition, stormwater pollutants identified in Part 5.2.3.2 of your SWPPP, but not monitored as benchmarks or effluent limitation guidelines, may also adversely affect listed species and critical habitat.

As these effects are difficult to analyze for listed species, their prey, habitat, and designated critical habitat, this form helps you to analyze your discharges and make a determination of whether your discharges will have likely adverse effects and whether there are any additional controls you can implement to ensure no likely adverse effects.

A. Evaluation of Pollutants and Controls to Avoid Adverse Effects. In this section, you must document all of your pollutant sources and pollutants expected to be discharged in stormwater. You must also document the controls you will implement to avoid adverse effects on listed aquatic and aquatic-dependent species. You must include specific details about the expected effectiveness of the controls in avoiding adverse effects to the listed aquatic-and aquatic-dependent species. Attach additional pages if needed.

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species. Include information supporting why the control(s) will ensure no adverse effects, including any data you have about the effectiveness of the control(s) in reducing pollutant concentrations. You may also attach photos of your controls to this form.
e.g., vehicle and equipment fueling	e.g., <ul style="list-style-type: none"> • Oil & grease • Diesel • Gasoline • TSS • Antifreeze 	e.g., <ul style="list-style-type: none"> • Fueling operators (including the transfer of fuel from tank trucks) will be conducted on an impervious or contained pad or under cover • Drip pans will be used where leaks or spills of fuel can occur and where making and breaking hose connections • Spill kit will be kept on-site in close proximity to potential spill areas • Any spills will be cleaned-up immediately using dry clean up methods • Stormwater runoff will be diverted around fueling areas using diversion dikes and curbing

Environmental Protection Agency (EPA) Industrial Stormwater Fact Sheet Series, Documents # EPA-833-F-06-034, *Sector S: Vehicle Maintenance Areas, Equipment Cleaning Areas, or Deicing Areas Located at Air Transportation Facilities*; and # EPA-833-F-06-029, *Sector N: Scrap Recycling and Waste Recycling Facilities*; both dated December 2006, state, under the the section entitled “What BMPs can be used to minimize contact between stormwater and potential pollutants at my facility?,” that

“A variety of BMP options may be applicable to eliminate or minimize the presence of pollutants in stormwater discharges ...Your first consideration should be for pollution prevention BMPs, which are designed to prevent or minimize pollutants from entering stormwater runoff and/or reduce the volume of stormwater requiring management. Prevention BMPs can include regular cleanup, collection and containment of debris in storage areas, and other housekeeping practices, spill control, and employee training.”

Finally, this section states, in both EPA-833-F-06-034 and in EPA-833-F-06-029, that “Implement BMPs, such as those listed below in Table 2...to minimize and prevent the discharge of pollutants in stormwater.”

The BMPs that follow are a combination of good housekeeping practices, minimizing exposure, erosion and sediment control, and management of runoff, similar to the BMPs listed in Table 2 of both EPA-833-F-06-034 and EPA-833-F-06-029. Employee training is covered in the SWPPP where it is noted that such training will be conducted and documented per the 2015 MSGP requirements. In addition to the routine quarterly inspections, the AerSale-Roswell facility will also carry out unannounced spot inspections. Finally, as noted in the following BMPs, the AerSale-Roswell facility will use Industrial Storm Wattles around out maintenance, and aircraft dismantling areas. An Industrial Storm Wattle is a storm water filtration tool to help remove sediment and absorb oil. It acts to trap debris washed away via stormwater runoff and discharges. All of these BMPs are to prevent or minimize pollutants from entering storm water runoff and/or reduce the volume of storm water requiring management. These BMPs are effective for storm events as well as for dry weather situations.

A network of storm drains exist throughout the AerSale-Roswell facility diverting storm water to a storm sewer. This storm sewer drains to Outfall 001.

In the event that these BMPs are not as effective as intended, the AerSale-Roswell facility will utilize Industrial Storm Wattles at the inlet, or at the immediate outlet, of Outfall 001.

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species.
Aircraft and vehicle fueling and aircraft de-fueling	Jet A aviation fuel Diesel fuel Unleaded gasoline	<ul style="list-style-type: none"> - 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 - Spill kits or absorbent materials will be kept on-site in close proximity to potential spill areas - Any spills will be cleaned up immediately using dry clean up methods
Ground vehicle and equipment maintenance	Unleaded gasoline Engine oil Antifreeze Brake fluid Power steering fluid Transmission fluid Degreasers Diesel	<ul style="list-style-type: none"> - 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 near potential spill areas - Any spills will be cleaned up immediately using dry clean up methods - Industrial storm water wattles will be kept around outdoor maintenance areas & replaced as necessary - If indoors, no floor drains, floor drains to sewer, or protected unknown floor drains
Aircraft dismantling - initial removal of reusable parts and removal of fluids	Engine oil Aviation hydraulic fluid Other oils Jet A aviation fuel	<ul style="list-style-type: none"> - Reuseable parts of the aircraft will be parted out and packaged for resale. - All fluids will be drained from aircraft, placed in covered, good-condition, properly labeled containers and then 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 near potential spill areas - Any spills will be cleaned up immediately using dry clean up methods - An industrial storm water wattle will be placed around the aircraft to filter storm water runoff
Aircraft dismantling - final dismantling and crushing of metal & stockpiling and storage of materials	Engine oil Aviation hydraulic fluid Battery acid Other oils Brake & transmission fluids Antifreeze Metals Chemical residue Paint residue	<ul style="list-style-type: none"> - Spill kits or absorbent materials will be kept on-site near potential spill areas - Any spills will be cleaned up immediately using dry clean up methods - If indoors, no floor drains, floor drains to sewer, or protected unknown floor drains - Aircraft will be drained of all fluids prior to dismantling - Dismantling will be conducted on designated "Crunch Pads." - An industrial storm water wattle will be kept around the "Crunch Pads" and scrap material storage to filter storm water runoff. The wattle will be replaced as necessary. - Lead-acid batteries will be segregated from other scrap materials and placed in properly labeled and good-condition, covered containers in Waste Materials storage areas or in enclosed storage sheds.
Material storage - fuel	Jet A aviation fuel Diesel fuel Unleaded gasoline	<ul style="list-style-type: none"> - Spill kits or absorbent materials will be kept on site near potential spill areas - Any spills will be cleaned up immediately using dry clean up methods - If indoors, no floor drains, floor drains to sewer, or protected unknown floor drains - Fuels will be stored in designated Fueling Area on impervious surface with secondary containment or on vehicles - All fuel containers will be clearly and accurately labeled

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species.
Loading/Unloading areas	Waste oil Waste fuels Waste Degreasers Waste aviation hydraulic fluid Waste batteries Waste soaps Waste Paint & assoc. materials Waste antifreeze Waste brake, transmission, and power steering fluids Paint & assoc. materials Degreasers Jet A aviation fuel Unleaded gasoline Diesel Engine oil Antifreeze Brake fluid Power steering fluid Soaps Transmission fluid Unused Batteries	- Spill kits or absorbent materials will be kept on-site near potential spill areas - Any spills/leaks will be cleaned up immediately using dry clean up methods
Aircraft Maintenance	Engine oil Aviation hydraulic fluid Degreasers Jet A aviation fuel Other oils	- Drip pans will be used where fuel leaks or spills can occur & where making or breaking hose connections - Spill kits or absorbent materials will be kept on-site near potential spill areas - Any spills/leaks will be cleaned up immediately using dry clean up methods - An industrial storm water wattle will be kept around each aircraft undergoing maintenance & replaced as necessary. - If indoors activity will be with no floor drains, floor drains to the sewer, or protected unknown floor drains
Aircraft Parking	Jet A aviation fuel Engine oil Aviation hydraulic fluid Other oils	- Spill kits or absorbent materials will be kept on-site near potential spill areas - Absorbent materials will be kept under engines - Any spills will be cleaned up immediately using dry clean up methods

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species.
Material storage - waste materials	Waste oil Waste fuels Waste Degreasers Waste aviation hydraulic fluid Used batteries Waste brake, transmission, and power steering fluids Waste soaps Waste paint & assoc. materials	- Spill kits or absorbent materials will be kept on-site near potential spill areas - Any spills/leaks will be cleaned up immediately using dry clean up methods - All waste containers will be clearly and accurately labeled - All materials will be stored on impervious surfaces in closed containers, totally enclosed sheds, or covered and bermed lean-tos, all of which are protected from rainfall and snowfall. -All waste containers will be in good condition.
Non-fuel unused material storage	Engine oil Antifreeze Brake fluid Power steering fluid Transmission fluid Paint & assoc. materials Degreasers Soaps Aviation hydraulic fluid Unused Batteries	- Spill kits or absorbent materials will be kept on-site near potential spill areas - Any spills/leaks will be cleaned up immediately using dry clean up methods - If indoors activity will be with no floor drains, floor drains to the sewer, or protected unknown floor drains - All containers will be clearly and accurately labeled - All containers will be in good condition.
Ground Vehicle Cleaning	Soaps Oil Radiator cleaning fluid Degreasers Windshield cleaner	- Activity will be indoors with no floor drains, floor drains to the sewer, or protected unknown floor drains

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species.
Employee/Vendor parking	Engine oil Antifreeze Power steering fluid Brake fluid Transmission fluid	- Spill kits or absorbent materials will be kept on-site near potential spill areas - Any spills/leaks will be cleaned up immediately using dry clean up methods
Equipment Storage	Oil Transmission fluid Fuel	- Spill kits or absorbent materials will be kept on-site near potential spill areas - Any spills/leaks will be cleaned up immediately using dry clean up methods - If indoors activity will be with no floor drains, floor drains to the sewer, or protected unknown floor drains - If outdoors, stored covered and on pallets or enclosed in plastic - Equipment will be drained of all fluids prior to storage
Contaminated Snowmelt	Unleaded gasoline Antifreeze Transmission fluid Power steering fluid Brake fluid Engine oil Diesel Unleaded gasoline Jet A aviation fuel	- Fluid will be collected immediately by absorbent materials or other means and stored in closed, labeled containers in Waste Materials storage areas

Potential Pollutant Source	Potential Pollutants	Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species.
Aircraft, ground vehicle, and equipment awaiting maintenance	Jet A aviation fuel Unleaded gasoline Engine oil Antifreeze Brake fluid Power steering fluid Transmission fluid Diesel Aviation hydraulic fluid	<ul style="list-style-type: none"> - Spill kits or absorbent materials will be kept on-site near potential spill areas - Any spills will be cleaned up immediately using dry clean up methods - If indoors activity will be with no floor drains, floor drains to the sewer, or protected unknown floor drains - Absorbent materials will be kept under engines - Activity will be in designated areas only
Painting	Paint Materials associated with painting	<ul style="list-style-type: none"> - Activity will be indoors with no floor drains, floor drains to the sewer, or protected unknown floor drains
AerSale-wide activities: floatable debris, dumpsters, storm drains	Garbage Floatable debris	<ul style="list-style-type: none"> - Any spills will be cleaned up immediately using dry clean up methods - Floatable debris will be removed to dumpsters - Dumpsters will be kept closed - Storm drains will be cleaned out every 6 months

☐ Check if you are not able to make a preliminary determination that any of your pollutants will be controlled to a level necessary to avoid adverse effects on aquatic and/or aquatic-dependent listed species and their designated critical habitat. You must check in [Section VI](#) that you are unable to make a determination of no likely adverse effects, and must complete the rest of the form. You must submit your completed form to EPA for assistance in determining your eligibility for coverage.

B. Analysis of Effects Based on Past Monitoring Data. Select which of the following applies to your facility:

☒ I have no previous monitoring data for my facility because there are no applicable monitoring requirements for my facility's sector(s).

☐ I have no previous monitoring data for my facility because I am a new discharger or a new source, but I am subject to monitoring under the 2015 MSGP. You must provide information to support a conclusion that your facility's discharges are not expected to result in benchmark or numeric effluent limit exceedances that will adversely affect listed species or their critical habitat:

☐ My facility has not had any exceedances under the 2008 MSGP of any required benchmark(s) or numeric effluent limits.

☐ My facility has had exceedances of one or more benchmark(s) or numeric effluent limits under the 2008 MSGP, but I have addressed them during my coverage under the 2008 MSGP, or in my evaluation of controls to avoid adverse effects in (A) above. Describe all actions (including specific controls) that you will implement to ensure that the pollutants in your discharge(s) will not result in likely adverse effects from future exceedances.

☐ Check if your facility has had exceedances of one or more benchmarks or numeric effluent limits under the 2008 MSGP and you have not been able to address them to avoid adverse effects from future exceedances, or if you are a new discharger or a new source but you are not sure if you can avoid adverse effects from possible exceedances. You must check in [Section VI](#) that you are unable to make a determination of no likely adverse effects. You must submit your completed form to EPA for assistance in determining your eligibility for coverage. You may not file your NOI for permit coverage until you are able to make a determination that your discharges will avoid adverse effects on listed species and designated critical habitat.

SECTION VI VERIFICATION OF PRELIMINARY EFFECTS DETERMINATION

Based on Steps I – V of this form, you must verify your preliminary determination of effects on listed species and designated critical habitat from your discharges and/or discharge-related activities :

☒ Following the applicable Steps in I – V above, I have made a preliminary determination that my discharges and/or discharge-related activities are not likely to adversely affect listed species and designated critical habitats.

☐ Following the applicable Steps in I – V above, I am **not** able to make a preliminary determination that my discharges and/or discharge-related activities are not likely to adversely affect listed species and designated critical habitats.


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 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

First Name, Middle Initial, Last Name: R A N D Y P H E L P S

Title: G E N E R A L M A N A G E R

Signature:  Date: 07/09/2018

E-mail: r a n d y . p h e l p s @ a e r s a l e . c o m

SECTION VII CRITERION C ELIGIBILITY FORM SUBMISSION INSTRUCTIONS

You must submit this completed form to EPA at msgpesa@epa.gov, including any attachments and any additional information that demonstrates how you will avoid or eliminate adverse effects to listed species or critical habitat (e.g., specific controls you will implement to avoid or eliminate adverse effects). **Any missing or incomplete information may result in a delay of your coverage under the permit.**

If you have made a preliminary determination that your discharges and/or discharge-related activities are not likely to adversely affect listed species and critical habitat, this form must be submitted a minimum of 30 days prior to submitting your NOI for permit coverage under criterion C. Please note that during either the 30-day *Criterion C Eligibility Form* review period prior to your NOI submission, or within 30 days after your NOI submission and before you have been authorized for permit coverage, EPA may advise you that additional information is needed, or that there are additional measures you must implement to avoid likely adverse effects.

If you are unable to make a preliminary determination that your discharges and/or discharge-related activities are not likely to adversely affect listed species and critical habitat, this worksheet must be submitted to EPA, but you may not file your NOI for permit coverage until you have received a determination from EPA that your discharges and/or discharge-related activities are not likely to adversely affect listed species and critical habitat.

Attachment 1

Include a map **and a written description** of the action area of your facility, as required in [Step 2](#). You may choose to include the map that is generated from the FWS' on-line mapping tool IPaC (the Information, Planning, and Consultation System) located at <http://ecos.fws.gov/ipac/>.

The written description of your action area that accompanies your action area map must explain your rationale for the extent of the action area drawn on your map. For example, your action area written description may look something like this:

The action area for the (name of your facility)'s stormwater discharges extends downstream from the outfall(s) in (name of receiving waterbody) (# of meters/feet/kilometers/miles). 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 (insert rationale). The action area does/does not extend to the (name of receiving waterbody)'s confluence with (name of confluence waterbody) because (insert rationale).

Note that your action area written description will be highly site-specific, depending on the expected effects of your facility's discharges and discharge-related activities, receiving waterbody characteristics, etc.

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.

Project Summary

Consultation Code: 02ENNM00-2016-SLI-0420

Event Code: 02ENNM00-2018-E-02197

Project Name: AerSale SWPPP (Updated)

Project Type: WATER QUALITY MODIFICATION

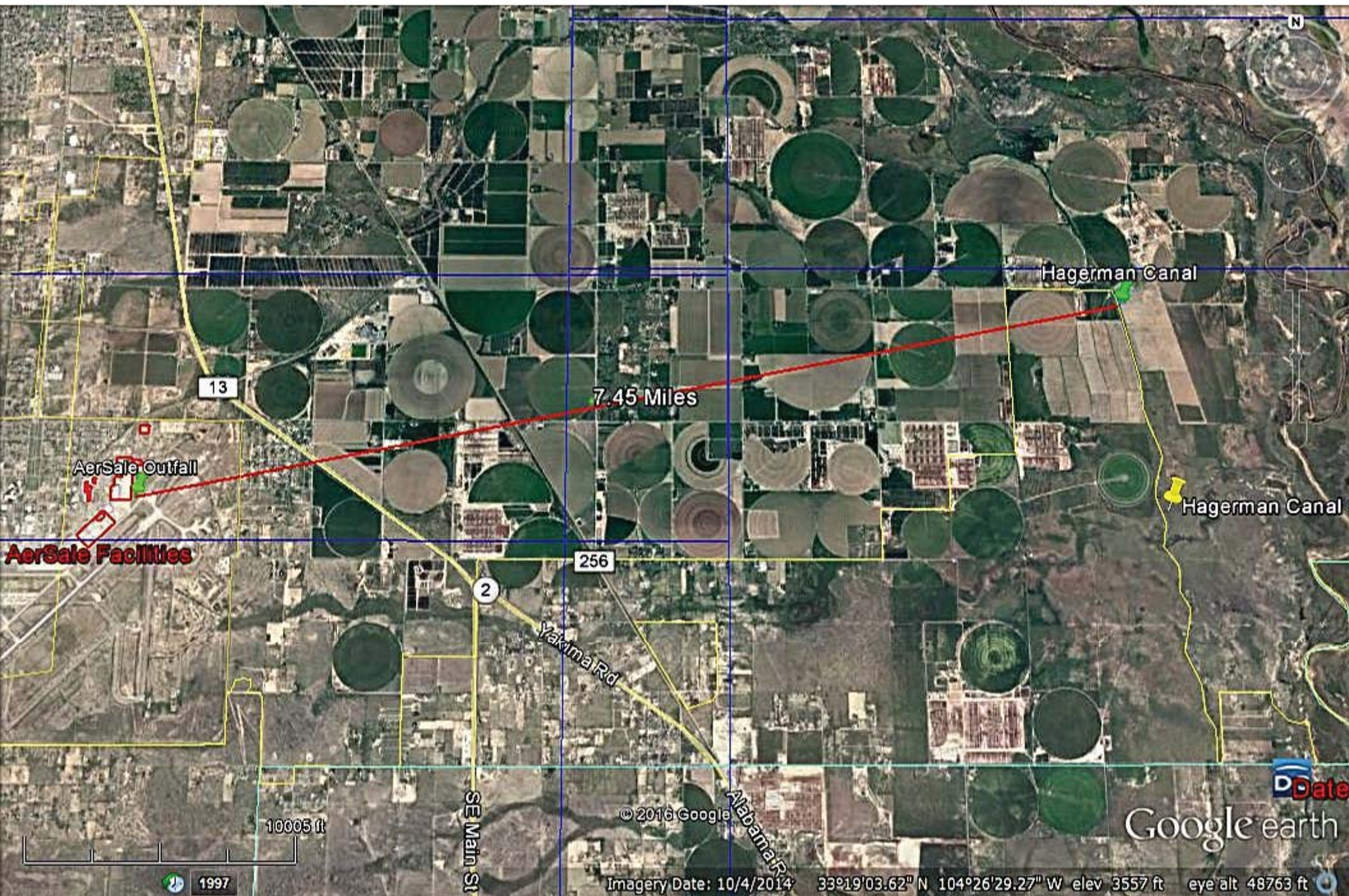
Project Description: Located at Roswell Airport, approximately 68 acres, development of a MSGP SWPPP, timing by August 31, 2018 or as soon as possible thereafter, MSGP

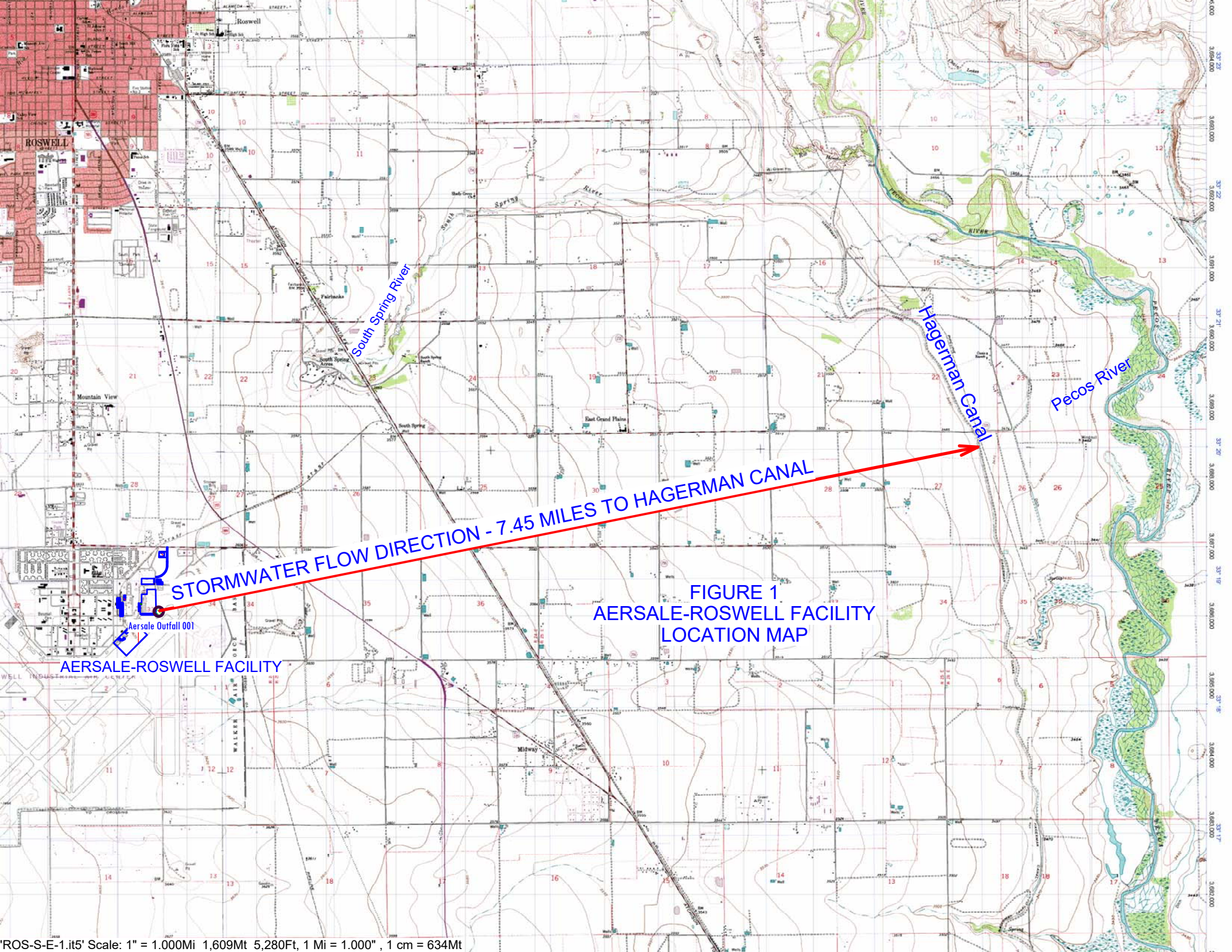
Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/33.31162973180736N104.512370812021W>



Counties: Chaves, NM





STORMWATER FLOW DIRECTION - 7.45 MILES TO HAGERMAN CANAL

FIGURE 1
AERSALE-ROSWELL FACILITY
LOCATION MAP

AERSALE-ROSWELL FACILITY

Aersale Outfall 001

Attachment 2

List or attach the listed species and critical habitat in your action area on this sheet, as required in [Step 3](#). You must include a list for applicable listed NMFS and FWS species and critical habitat. If there are listed species and/or critical habitat for only one Service, you must include a statement confirming there are no listed species and/or critical habitat for the other Service. For FWS species, include the full printout from your IPaC query. *Note: If your Official Species List from the USFWS indicated no species or critical habitat were present in your action area, include the full consultation tracking code at the top of your Official Species List in your NOI submittal in the question "Provide a brief summary of the basis for the criterion selected in Appendix E." If an Official Species List was not available on IPaC, list the contact date and name of the Service staff with whom you corresponded to identify the existence of any USFWS species or critical habitat present in your action area.*

There are no listed NMFS species in or around the action area. The list of FWS species and critical habitat is attached as the full printout from our IPaC query.



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:

July 05, 2018

Consultation Code: 02ENNM00-2016-SLI-0420

Event Code: 02ENNM00-2018-E-02197

Project Name: AerSale SWPPP (Updated)

Subject: Updated list of threatened and endangered species that may occur in your proposed project location, and/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

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: 02ENNM00-2018-E-02197

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 August 31, 2018 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/place/33.31162973180736N104.512370812021W>



Counties: Chaves, NM

Endangered Species Act Species

There is a total of 12 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 Fisheries¹, 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.

-
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
Least Tern <i>Sterna antillarum</i> Population: interior pop. No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8505	Endangered
Northern Aplomado Falcon <i>Falco femoralis septentrionalis</i> 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 <i>Charadrius melodus</i> 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. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6039	Threatened

Fishes

NAME	STATUS
<p>Pecos Bluntnose Shiner <i>Notropis simus pecosensis</i></p> <p>There is final critical habitat for this species. Your location is outside the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/4362</p>	Threatened
<p>Pecos Gambusia <i>Gambusia nobilis</i></p> <p>No critical habitat has been designated for this species.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/460</p>	Endangered

Snails

NAME	STATUS
<p>Koster's Springsnail <i>Juturnia kosteri</i></p> <p>There is final critical habitat for this species. Your location is outside the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/3126</p>	Endangered
<p>Pecos Assiminea Snail <i>Assiminea pecos</i></p> <p>There is final critical habitat for this species. Your location is outside the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/4519</p>	Endangered
<p>Roswell Springsnail <i>Pyrgulopsis roswellensis</i></p> <p>There is final critical habitat for this species. Your location is outside the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/923</p>	Endangered

Crustaceans

NAME	STATUS
<p>Noel's Amphipod <i>Gammarus desperatus</i></p> <p>There is final critical habitat for this species. Your location is outside the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/8042</p>	Endangered

Flowering Plants

NAME	STATUS
<p>Kuenzler Hedgehog Cactus <i>Echinocereus fendleri</i> var. <i>kuenzleri</i></p> <p>No critical habitat has been designated for this species.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/2859</p>	Threatened
<p>Pecos (=puzzle, =paradox) Sunflower <i>Helianthus paradoxus</i></p> <p>There is final critical habitat for this species. Your location is outside the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/7211</p>	Threatened
<p>Wright's Marsh Thistle <i>Cirsium wrightii</i></p> <p>No critical habitat has been designated for this species.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/8963</p>	Candidate

Critical habitats

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

ATTACHMENT J

SWPPP MODIFICATIONS

ATTACHMENT K

NOI, USEPA CORRESPONDENCE, MSGP

mary

From: Rittenhouse, Bryan <Rittenhouse.Bryan@epa.gov>
Sent: Wednesday, July 11, 2018 8:33 AM
To: mary
Subject: AerSale-Roswell MSGP Criterion C Form

This email is in response to the Criterion C Eligibility Form submitted to US EPA as part of the industrial Multi-Sector General Permit (MSGP) requirements. The Form submitted for AerSale-Roswell was complete and forwarded to the Services for review on 11 July 2018. You may submit the NOI for permit coverage if no response is received by 9 August 2018.

Bryan Rittenhouse
Water Permits Division

mary

From: mary <mary@barronsenvironmental.com>
Sent: Monday, July 9, 2018 4:26 PM
To: 'msgpesa@epa.gov'
Cc: Randy Phelps (randy.phelps@aersale.com); Jordan Creel (jordan.creel@aersale.com); Scott Stark (s.stark@roswell-nm.gov)
Subject: AerSale-Roswell Criterion C Eligibility Form
Attachments: Corrected AerSale-Roswell Criterion C Eligibility Form.pdf

Gentle persons,

Please disregard the Criterion C eligibility form sent earlier today and use the attached. The previous form erroneously referred to de-icing fluids under “Controls to Avoid Adverse Effects on Listed Aquatic and Aquatic-Dependent Species” for the Potential Pollutant Source “Non-fuel unused material storage.” AerSale, Inc. Roswell, New Mexico Facility does not carry out de-icing activities and does not store de-icing fluids.

I apologize for any inconvenience caused by this error.

Mary Barron
Barron’s Environmental Solutions – In Time!, Inc.

ATTACHMENT L

ANNUAL REPORTS