



G R E S H A M
S M I T H A N D
P A R T N E R S

in association with

KB Environmental Sciences, Inc.

Vanasse Hangen Brustlin, Inc

National Aviation System Planning Symposium

May 22, 2012
Galveston, Texas

Jill Lukehart

Gresham, Smith and Partners

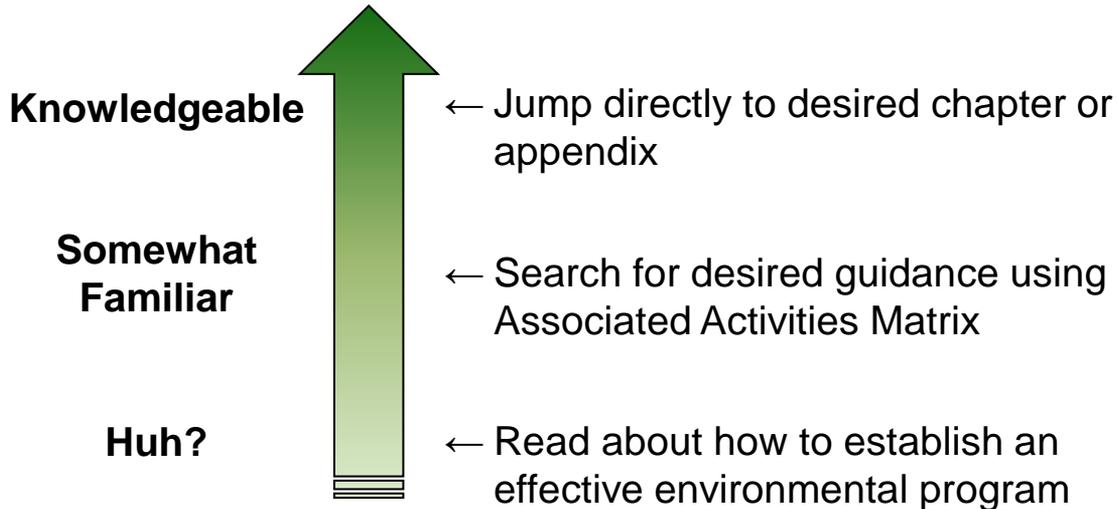


ACRP's Guidebook Objectives



- Reach the target audience of thousands of small airports
 - Small hub, non-hub, reliever, and general aviation
- Promote environmental awareness
- Identify federal environmental compliance requirements
 - Regulated activities typically occurring at small airports
 - Does not address state and local requirements
- Outline proactive environmental stewardship practices
- Identify resources/tools

- Written and formatted to accommodate a broad range of airport personnel



Guidebook Contents



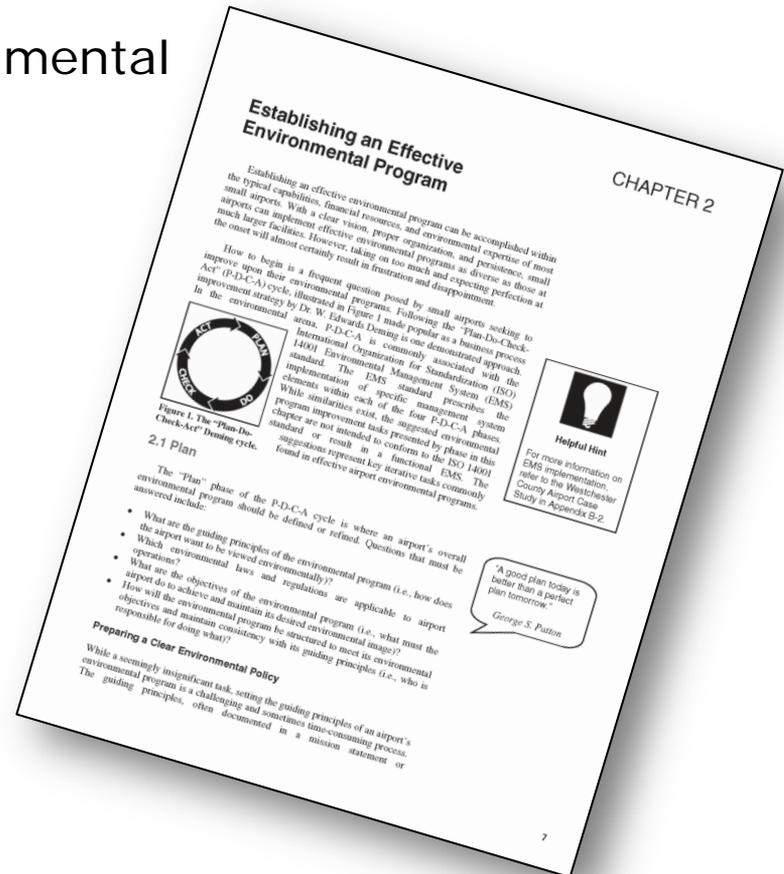
- Chapter 1 – Introduction
- Chapter 2 – Establishing an Effective Environmental Program
- Chapter 3-8 – Federal Environmental Regulatory Programs
- Chapter 9 – Other Opportunities for Proactive Environmental Stewardship
- Appendix A – Proactive Environmental Stewardship Practices
- Appendix B – Case Studies

ACRP
REPORT 43

AIRPORT
COOPERATIVE
RESEARCH
PROGRAM

Chapter 2 Establishing an Effective Environmental Program

- Introduces basic environmental program components
 - Plan
 - Do
 - Check
 - Act



	Aircraft Deicing/Anti-icing	Aircraft Operation	Aircraft Lavatory Service	Airport Layout Plan (ALP) Changes	Auxiliary Power Unit Operation	Building Operation/Maintenance	Bulk Fuel and Oil Storage/Handling	Cargo Handling	Chemical Storage/Handling	Degreasing	Demolition/Construction/Development	Fire Fighting Training/Testing/Flushing	Ground Service Equipment Operation	Grounds Maintenance/Landscaping	Incinerator Operation	Motor Vehicle Operation	On-airport Power Generation	Painting	Pavement Deicing	Property Acquisition	Refueling	Runway Rubber Removal	Spill Response	Vehicle/Equipment/Aircraft Maintenance	Washing	Waste Generation/Disposal
Chapter 3 Air Quality																										
3.1 Jurisdictional Authority																										
3.2 General Regulations	•	•	•		•	•	•	•	•	•	•	•	•	•	•	•	•	•	•		•	•	•	•	•	•
3.3 Air Pollutant Regulations	•	•	•		•	•	•	•	•	•	•	•	•	•	•	•	•	•	•		•	•		•	•	•
3.4 General Conformity Regulations	•	•	•		•	•	•	•	•	•	•	•	•	•	•	•	•	•	•		•					•
3.5 Mobile Source Regulations		•	•		•		•			•		•	•			•				•				•	•	•
3.6 Stationary Source Regulations	•				•	•			•	•		•			•		•	•	•					•	•	•
3.7 Regulations on Ozone Depleting Substances					•				•															•		
3.8 Airports and Greenhouse Gases	•	•	•		•	•		•	•		•	•	•	•	•	•	•	•	•		•					•
3.9 Airports and Ultrafine Particulate Matter		•			•			•			•	•	•	•	•	•	•									•
Chapter 4 Emergency Planning and Response																										
4.1 Community Emergency Planning, Storage, and Release Reporting	•				•	•	•	•	•	•			•						•		•		•	•		
4.2 Spill Prevention, Control, and Countermeasure					•	•	•					•				•	•				•		•	•		
4.3 Pesticide Application, Certification, and Disposal					•		•	•					•										•			•

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4.5 Hazardous Material Transport	•					•		•	•	•				•				•	•		•		•	•		•
Chapter 5 Noise																										
5.1 Part 150 Programs				•																•						
5.2 Part 161 Access Restrictions																				•						
Chapter 6 Planning and Development																										
6.1 Historic, Archaeological, and Ethnological Resources											•									•						
6.2 Environmental Protection											•									•						
6.3 Property Transfer											•									•						•
6.4 Public Involvement											•									•						
6.5 Fish, Wildlife, and Plants											•		•							•						•
Chapter 7 Waste Management																										
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7.3 Used Oil and Used Oil Filters		•				•	•		•				•			•	•						•	•		•

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9.2 Other Environmental Stewardship Practices		•			•			•	•		•		•	•		•	•			•				•	•	•
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Waste Management Question

- Can I throw my vehicle maintenance waste in the trash?



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Chapter 7 Waste Management



Waste Management

The operations at small airports generate waste subject to federal, state, and local waste management regulations. Across all industries, the management of waste is heavily regulated in response to past detrimental impacts to human health and environment associated with waste disposal practices. Today, waste is regulated using a “cradle-to-grave” approach, which refers to regulation from the point in time a waste is generated to the time it is ultimately disposed.

Waste generated by airports can be broadly categorized as non-hazardous and hazardous. Non-hazardous wastes are generally regulated at the state and local levels and are not addressed further in this chapter. This chapter focuses on hazardous wastes, or materials that may become hazardous waste depending on how they are managed. Additionally, due to their human health risks, polychlorinated biphenyls, lead-based paint, and asbestos-containing materials have unique regulatory requirements restricting their use and handling. These materials are discussed in this chapter because human health risks prompt facilities to eliminate these materials, thus potentially generating regulated waste.

The federal requirements presented in this chapter that are applicable to waste management include the following:

- Resource Conservation and Recovery Act of 1976, as Amended (RCRA)
- Toxic Substances Control Act of 1976, as Amended (TSCA)

The topics presented in Chapter 7 include the following:

- Hazardous Waste Regulations
- Universal Waste Requirements
- Used Oil and Used Oil Filters
- Polychlorinated Biphenyl Waste
- Asbestos Containing Material Management
- Lead

7.1 Hazardous Waste Regulations

Resource Conservation and Recovery Act of 1976, as Amended

RCRA, an amendment to the Solid Waste Disposal Act of 1965, established requirements to ensure the proper **cradle-to-grave** management of hazardous waste. However, to assess RCRA applicability, airports must first determine if their waste is a hazardous waste. RCRA hazardous wastes are identified through a three-step determination process based on the following questions:

1. Is the material a “solid waste”?
2. If yes to question number 1, is the solid waste excluded from RCRA regulation?
3. If no to question number 2, is the solid waste a “hazardous waste”?

Associated Activities

- Aircraft operation
- Building operation/ maintenance
- Bulk fuel and oil storage/handling
- Cargo handling
- Chemical storage/handling
- Degreasing
- Demolition/ construction/ development
- Ground service equipment operation
- Motor vehicle operation
- On-airport power generation
- Painting
- Refueling
- Spill response
- Vehicle/equipment/ aircraft maintenance
- Waste generation/ disposal

< Background of topic

< Rules covered in chapter

< Associated Activities

< Description of specific regulation

Chapter 7 Waste Management



While only three questions, the process for identifying hazardous waste is complex and requires direct consultation with the applicable regulations and hazardous waste determination guidance. Several EPA guidance documents are identified in this chapter as additional resources. Ultimately, a solid waste is a hazardous waste if:

- It is a **listed hazardous waste** in Subpart C of RCRA.
- It is a mixture of solid waste and one or more listed hazardous wastes.
- It is a **characteristic hazardous waste** exhibiting one or more of the characteristics of ignitability, corrosivity, reactivity, or toxicity.

Generators of hazardous waste fall into one of three classes depending upon the amount of hazardous waste generated in a calendar month. Generator classification can change from one month to the next, and the regulatory requirements increase as more waste is generated. The three generator classifications include the following:

- **Conditionally Exempt Small Quantity Generator (CESQG)**
- **Small Quantity Generator (SQG)**
- **Large Quantity Generator (LQG)**

The key elements of hazardous waste management include:

- Registration of generator activities
- Characterization (identification) of waste streams
- Accumulation container management
- Shipping documentation (i.e., **Uniform Hazardous Waste Manifest**)
- Disposal at a permitted facility
- Confirmation of recycling or disposal

A key requirement for hazardous waste management is proper storage of waste, including storage location and volume requirements, and proper closing and labeling of containers. Depending on the classification of generator, restrictions apply to the duration facilities can store full waste containers on site (i.e., 90, 180, or 270 days). Storage of hazardous wastes beyond the established timeframes requires a special treatment, storage, or disposal permit from EPA.

Small Airport Applicability

Airports operators should understand if the wastes they generate are hazardous or non-hazardous. Typically, airports do not generate large volumes of hazardous waste from their operations, and therefore are usually classified as either a CESQG or SQG. Examples of hazardous wastes that may be generated at an airport include ignitable waste solvents from vehicle maintenance activities or discarded oil-based paint. Additionally, used spill clean-up materials may be hazardous, depending on the chemical spilled.

If a waste is determined to be hazardous, adequate container management and shipping documentation requirements apply. A certified waste hauler should be used to remove hazardous waste from the facility.

< Key terms in **BOLD**

< Helpful Hints

- Highlights information and references to Appendix A

< Small Airport Applicability



Helpful Hint

Disposal of hazardous wastes could be costly. Consider substituting non-hazardous products for those that result in a hazardous waste upon use.

For more information, refer to Haz Waste-1 Practice in Appendix A-16.

Chapter 7 Waste Management



International flights carrying hazardous materials (see Section 4.5) may be subject to the hazardous waste generator and management requirements. Similarly international exports of hazardous wastes are also subject to reporting and manifest requirements. Airports should be aware of tenants performing these activities at their facilities.

Compliance Attainment Strategies

- Characterize and document waste streams generated by the airport as hazardous or non-hazardous wastes.
- Understand and document the airport's generator status.
- Do not mix hazardous wastes with solid non-hazardous waste.
- Ensure staff properly labels and closes storage containers after use.
- Ensure hazardous wastes are not stored in greater quantities or for longer periods than are permissible for the airport's generator status.
- Perform required inspections on a regular schedule and maintain records of the inspections on file.
- Complete and retain Uniform Hazardous Waste Manifest records and Land Disposal Restriction Forms.
- Identify and implement opportunities to reduce hazardous waste generation.

Key Terms

- **Characteristic Hazardous Waste**—A solid waste, as defined in 40 Code of Federal Regulations (CFR) 261.2, which is not excluded from regulation as a hazardous waste under §261.4(b), and exhibits any of the characteristics of ignitability, corrosivity, reactivity or toxicity.
- **Conditionally Exempt Small Quantity Generator (CESQG)**—Generators that generate ≤ 220 pounds per month of hazardous waste, ≤ 2.2 pounds per month of acutely hazardous waste, or < 220 pounds per month of acute spill residue or contaminated soil. Conditionally Exempt Small Quantity Generators may not store more than 1,000 kg of hazardous waste at any time.
- **Cradle-to-Grave**—A general RCRA term that describes regulation of a hazardous waste from the time it is generated to the time it is disposed.
- **Generator**—Any entity, by site, whose act or process produces hazardous waste identified or listed in part 40 CFR 261 or whose act first causes a hazardous waste to become subject to regulation.
- **Large Quantity Generator (LQG)**—Generators that generate $\geq 2,200$ pounds per month of hazardous waste, > 2.2 pounds per month of acutely hazardous waste, or > 220 pounds per month of acute spill residue or contaminated soil.
- **Listed Hazardous Waste**—A solid waste is a hazardous waste if it is listed in this subpart, unless it has been excluded from this list under 40 CFR 260.20 and §260.22, including F-, K-, P- and U-listed hazardous wastes.
- **Small Quantity Generator (SQG)**—Generators that generate > 220 pounds, but $< 2,200$ pounds, of hazardous waste per month.
- **Solid Waste**—A waste, as defined in 40 CFR 261.2, including any garbage, refuse, sludge from a waste treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural



Did You Know

Steel aerosol cans that are emptied of their contents and recycled for metal content are exempt from the RCRA disposal requirements.

- < Compliance Attainment Strategies
 - Practical actions for common compliance pitfalls
- < Did You Know
- < Key Terms
 - Brief definitions of **BOLD** terms
 - All terms in glossary

Chapter 7 Waste Management



operations and community activities, but does not include solid or dissolved material in domestic sewage.

- **Uniform Hazardous Waste Manifest**—EPA form 8700-22 and any continuation sheet attached to the form that provides information about the generator of the waste; the facility receiving the waste; the nature of and quantity of the waste; shipping container types and numbers; and shipping method. The manifest was developed to meet both EPA’s requirements for a manifest, and U.S.DOT’s requirements for shipping papers.

Additional Resources

- 40 CFR 260 – 268
- Introduction to Land Disposal Restrictions (40 CFR Part 268)
<http://www.epa.gov/waste/inforesources/pubs/hotline/training/ldr05.pdf>
- RCRA Corrective Action
<http://www.epa.gov/epawaste/hazard/correctiveaction/index.htm>
- Hazardous Waste Generator Summary Chart
<http://www.epa.gov/waste/hazard/generation/summary.htm>
- Hazardous Waste Characteristics, A User-friendly Reference Document
<http://www.epa.gov/waste/hazard/wastetypes/wasteid/char/hw-char.pdf>

7.2 Universal Waste Requirements

Resource Conservation and Recovery Act of 1976, as Amended

In 1995, RCRA was amended to reduce the hazardous waste management requirements for certain commonly generated hazardous wastes to encourage recycling and to prevent disposal with municipal solid waste. The subset of hazardous wastes regulated by the 1995 amendments are called **universal wastes** and include certain batteries, pesticides, **mercury-containing equipment** (including thermostats), and **lamps** (defined in 40 CFR 273.2), all of which may be found at airports. If universal waste is not managed as specified by the universal waste rules, it must be managed as hazardous waste fully subject to the RCRA hazardous waste requirements described in Section 7.1.

Facilities that generate universal wastes are known as **Universal Waste Handlers**. Universal Waste Handlers are either considered **Small Quantity Handlers of Universal Waste (SQHUW)** or **Large Quantity Handlers of Universal Waste (LQHUW)**. SQHUW have less than 5,000 kg of universal waste accumulated at their facilities at any given time. A Universal Waste Handler must inform the EPA Regional Administrator before accumulating 5,000 kg or more universal waste at a facility, and must also receive an EPA identification number. The Universal Waste Handler accumulating 5,000 kg or more is then considered a LQHUW until the end of the calendar year. LQHUW must maintain records of shipments of universal waste for at least 3 years.

Universal waste handlers must comply with certain storage timeframes and labeling requirements. For example, used lamps must be stored in packages so they do not break and labeled with the words “Universal Waste Lamps.” Spent batteries must be labeled with the words “Universal Waste Batteries.” The

< Additional Resources

- Regulatory references
- Web links to guidance

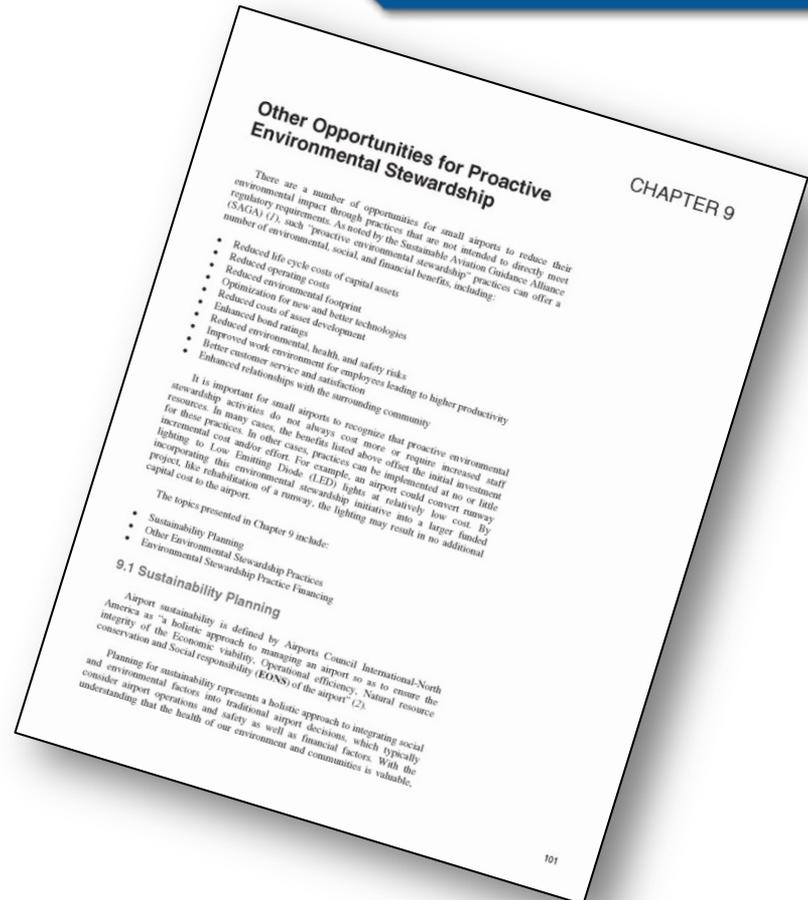
Associated Activities

- Building operation/ maintenance
- Chemical storage/ handling
- Demolition/ construction/ development
- Grounds maintenance/ landscaping
- Spill response
- Vehicle/equipment/ aircraft maintenance
- Waste generation/ disposal

Chapter 9 Other Opportunities for Proactive Environmental Stewardship



- Describes aspects of sustainability programs
 - Sustainability planning
 - Other environmental stewardship practices
 - Practice financing



Appendix A Proactive Environmental Stewardship Practices



APPENDIX A

Proactive Environmental Stewardship Practices

The proactive environmental stewardship practices identified in this Appendix are applicable to small airports and are grouped by the following common topics (with the practice identifiers listed in parenthesis).

- Mobile Air Emissions Source Practices (Mobile Air)
- Stationary Air Emissions Source Practices (Stationary Air)
- Construction Air Emissions Practices (Construction Air)
- Air Emissions Evaluation and Reporting Practices (Air Evaluation)
- Indoor Air Quality Practices (Indoor Air)
- Spill Prevention, Response and Notification Practices (Spill)
- Chemical/Hazardous Material Storage Practices (CHM)
- Pesticide Application, Certification, and Disposal Practices (Pesticides)
- Underground Storage Tank Practices (UST)
- Noise Practices (Noise)
- Planning Practices (Planning)
- Public Relations Practices (PR)
- Vegetation and Wildlife Management Practices (Wildlife)
- Property Transfer Practices (Property)
- Waste Minimization Practices (Waste)
- Hazardous/Universal Wastes, Polychlorinated Biphenyls and Used Oil Practices (Haz Waste)
- Deicer Runoff Management Practices (Deicer)
- Water Conservation Practices (Water Conservation)
- Construction Storm Water Discharge Practices (Construction SW)
- Industrial Storm Water Discharge Practices (Industrial SW)
- Storm Water Management Practices (SW Quantity)
- Storm Water Quality Protection Practices (SW Quality)
- Energy Efficiency and Renewable Energy Practices (Energy)
- Administration and Policy Practices (Admin and Policy)

Appendix A Proactive Environmental Stewardship Practices (cont.)

- How can we more actively manage waste and identify opportunities for increased recycling?



Appendix A Proactive Environmental Stewardship Practices (cont.)



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- Storm Water Quality Protection Practices (SW Quality)
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- Administration and Policy Practices (Admin and Policy)

APPENDIX A-15

Waste Minimization Practices

Airport operations generate many different types of waste streams. As airport operators develop their understanding of how wastes are managed, there are opportunities to reduce the amount of wastes generated and increase recycling. Airports around the country are beginning to incorporate these practices into their routine operations and are being recognized for their efforts. The following proactive waste minimization practices will assist with minimizing wastes generated at airports, identifying beneficial reuses of materials, or presenting alternative disposal methods for typical airport wastes:

Applicable Federal Regulatory Programs

- Resource Conservation and Recovery Act (Chapter 7)
- Toxic Substances Control Act (Chapter 7)

Planning Activities

- ✓ Understand the Airport's Waste Streams and Use Information to Facilitate Waste Reduction and Recycling
- ✓ Conduct an Audit for Recyclable Materials and Establish an Airport-wide Recycling Program
- ✓ Purchase Equipment to Facilitate Recycling
- ✓ Increase the Number of Recycling Containers and Locate Strategically Around Airport
- ✓ Encourage Onboard Recycling Programs for Airlines
- ✓ Establish a Centralized Waste and Recycling Management Program
- ✓ Coordinate Recycling Collection Infrastructure with Hauler Capabilities
- ✓ Utilize Waste Reducing Innovative Building Materials and Techniques
- ✓ Establish a Food Waste Diversion Program
- ✓ Establish a Food Donation Program
- ✓ Establish a Food Waste Composting Program

Active Practices

- ✓ Require the Use of Compostable or Reusable Tableware
- ✓ Implement Incentives to Minimize Plastics
- ✓ Develop Recycling and Waste Reduction Competitions Between Different Airport Departments
- ✓ Segregate and Recycle or Reuse Construction/Demolition Debris
- ✓ Minimize Removal of Trees or Vegetation and Reuse
- ✓ Recycle Hot-drained or Crushed Non-terme Plated Used Oil Filters

Appendix A-15 Waste Planning Practices

Waste-1: Understand the Airport's Waste Streams and Use Information to Facilitate Waste Reduction and Recycling

Airport operations, staff, tenants, fixed-base operators, and airlines generate many different types of waste streams. Examples of typical airport wastes include used oil, aircraft lavatory waste, cardboard, paper, electronic equipment, used absorbent materials, batteries, and paint. Depending on the type of waste generated, many different regulatory requirements could apply, each requiring different disposal methods. Airport operators should have a thorough understanding of their activities, projects, and facilities so that opportunities for waste recycling or beneficial reuse practices are recognized.

Staffing	Cost
Effort 	Capital \$\$
Knowledge 	Operational NC
Frequency Annually	Savings 

To help identify an airport's waste streams, a baseline waste audit should be conducted for the entire airport. The audit should result in an inventory of each of the airport's waste streams, which will be used to determine if enough waste is generated to justify a waste reduction or recycling program. The inventory can also help facilitate establishing procedures for adequately managing wastes, identifying infrastructure needs, or additional recycling opportunities. Additionally, the results of the inventory may help an airport understand inefficiencies and identify opportunities to enhance its waste management program. For example, with adequate information (e.g., waste volumes, types), the airport has the ability to negotiate waste hauling/disposal contract terms and conditions to help improve the program's cost-effectiveness. Annual reviews of the inventory should be performed to help identify changes in the airport's waste streams or other efficiencies that could be made to the airport's waste management program.

Benefits

- Increases understanding of airport operations
- Increases opportunity for recycling
- Simplifies waste collection
- Reduces cost and better contract terms for waste hauling and disposal
- Reduces volume of materials diverted to landfills

Additional Resources

- Wisconsin Department of Natural Resources, Waste Inventory Sheet
http://www.dnr.state.wi.us/permitprimer/solidwaste/waste_inventory_sheets.pdf

Other Proactive Environmental Stewardship Practices

Admin and Policy-2: Include Environmental Clauses in Lease Agreements

The lease can serve as a guide to encourage airport tenants to use sustainable practices, and to comprehend the importance of sustainability to the airport. Lease agreements for tenants could include environmental performance objectives. Included in the lease language would be requirements for tenants to provide results/reports for environmental analyses, as well as conduct and maintain BMPs for environmental protection and to prevent or lessen environmental impacts.

Results/reports required by the lease agreement could include air quality/emissions, noise abatement, energy consumption and costs, recycling measures, water quality, and/or other applicable reports.

Benefits

- Establishes tenant responsibility for sustainability initiatives
- Conservation measures result in cost savings

Additional Resources

- U.S. General Services Administration, *Green Lease Policies and Procedures*
http://www.gsa.gov/Portal/gsa/ep/contentView.do?noc=T&contentType=GSA_BASIC&contentId=28303

<i>Staffing</i>
Effort 
Knowledge 
Frequency Ongoing

<i>Cost</i>
Capital \$
Operational \$
Savings 

Other Proactive Environmental Stewardship Practices (cont.)

Noise-14: Implement a Voluntary Curfew or Voluntary Restraint from Flying

The implementation of a voluntary restraint from flying program to limit loud noise events during late nighttime and/or early morning time can reduce noise exposure and community annoyance. Coordination and communication with aircraft users is necessary to ensure effective participation.

Benefits

- Reduces noise exposure resulting from night flights
- Reduces overall DNL noise exposure due to the nighttime penalty for obtrusiveness

Additional Resources

- FAA AC 150/5020, *Noise Control and Compatibility Planning for Airports*
http://www.airweb.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/0/F4FAE43A49D9F2FE86256C720077AD35?OpenDocument
- Title 14 CFR Part 161, *Notice and Approval of Airport Noise and Access Restrictions*
http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=9eea2835dca447270645f9582d872924&c=ecfr&tpl=/ecfrbrowse/Title14/14cfrv3_02.tpl
- *ACRP Synthesis 16: Compilation of Noise Programs in Areas Outside DNL 65*
http://onlinepubs.trb.org/onlinepubs/acrp/acrp_syn_016.pdf

<i>Staffing</i>
Effort 
Knowledge 
Frequency
Ongoing

<i>Cost</i>
Capital \$
Operational \$
Savings 

Other Proactive Environmental Stewardship Practices (cont.)

Deicer-6: Construct a Deicer-laden Snow Management Area to Collect and Contain Contaminated Snowmelt

Providing a dedicated area for deicer-laden snow could reduce the total amount of snow impacted by deicer at an airport. Collection and segregation of deicer-laden snow will reduce contamination of clean snow and may also facilitate compliance with deicing-related requirements in a NPDES permit (e.g. limits on biochemical oxygen demand, chemical oxygen demand, total organic carbon, propylene glycol or ethylene glycol concentration, or load-based limits) if drainage from the deicer-laden snow area is diverted to a sanitary sewer or other treatment facility.

Snow management staff will need to be trained to identify snow containing deicer and know the appropriate area for accumulation of deicer-laden snow. Ideally the area designated for deicer-laden snow should be adjacent to the area where aircraft deicer is applied, and the snow management area should be a well marked area identified on a map for operators' reference.

Drain covers may be used to prevent melting snow from entering the storm drain system, and a glycol recovery vehicle could be used to collect the snowmelt off the pavement. If snow piles regularly accumulate and cause visibility issues, snow melters can be used to reduce the volume of stored snow. Alternatively, if the storm water pipes do not leak, and if it is feasible to isolate drainage from the snow management area, valves could be installed within the storm water drainage system to collect melted snow in the pipes. A vacuum truck could then be used to remove the melted snow from the pipes at a centralized location, or additional piping could be installed to direct collected runoff to a centralized storage location. Collected deicer-laden snow melt could then be trucked to the local municipal sanitary sewer, off-site recycling facility, or treated on site.

Benefits

- Reduces the amount of snow contaminated with deicer
- Improves water quality in receiving streams
- Facilitates compliance with a NPDES System permit

<i>Staffing</i>	<i>Cost</i>
Effort 	Capital \$\$\$
Knowledge 	Operational \$
Frequency Deicing Season	Savings 

- Garnering Support within a Small Airport Organization to Initiate Proactive Environmental Stewardship Activities
- Implementing an Environmental Management System to Facilitate Compliance and Reduce Environmental Impacts at Small Airports
- Establishing a Small Airport Sustainability Program
- Developing an Airport-wide Storm Water Pollution Prevention Program
- Implementing Renewable Energy Systems at Small Airports

Upcoming ACRP Guidance



- ACRP 03-25: Regulatory Compliance Costs and Impacts on Small Airports
- ACRP 02-40: Climate Change Risk Assessment and Adaptation Planning at Airports

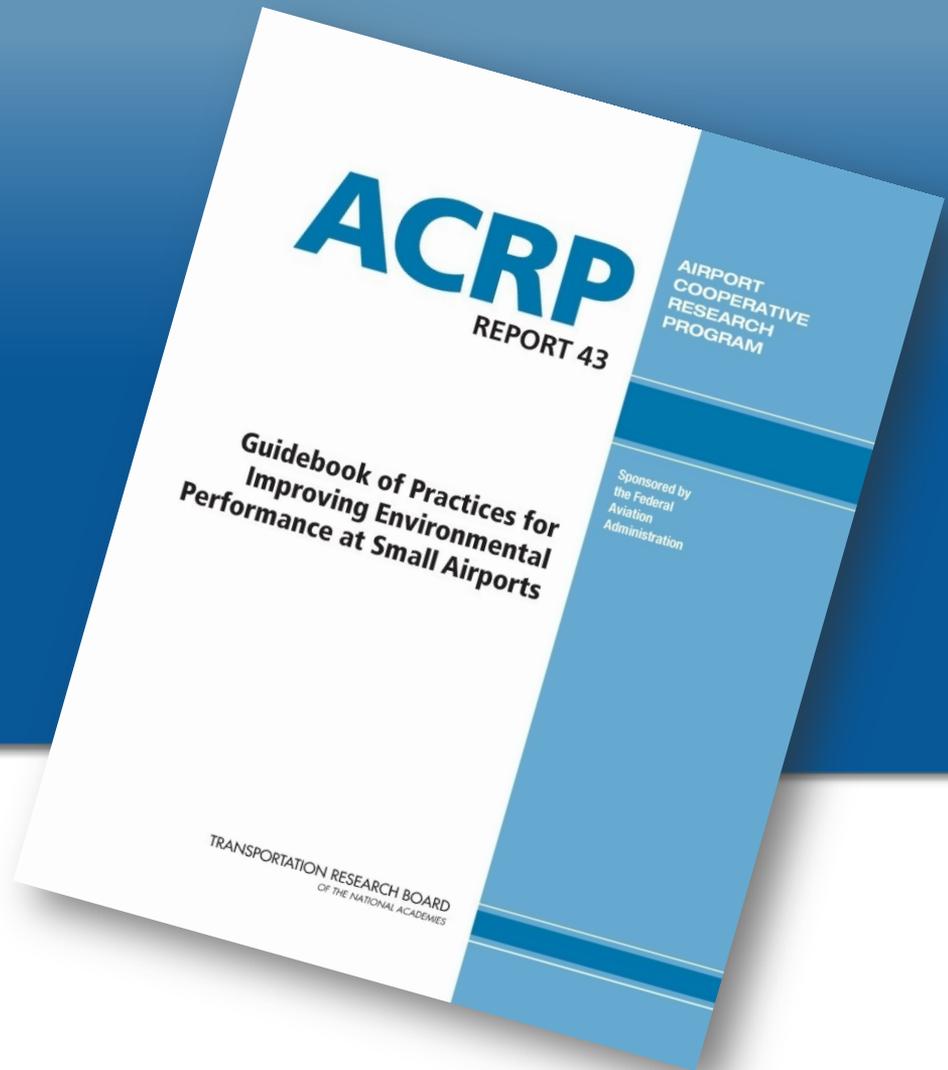


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Thank you!