

**STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER BUREAU**

In the matter of:

ACO-000018

Date Entered: 10-14-09

Bishop International Airport Authority
G-3425 West Bristol Road
Flint, Michigan 48507

ADMINISTRATIVE CONSENT ORDER

This document results from allegations by the Department of Environmental Quality (DEQ), Water Bureau (WB). The DEQ alleges that the Bishop International Airport Authority (Authority) is operating the Bishop International Airport (Airport) located at G-3425 West Bristol Road, Flint, Genesee County, in violation of Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), MCL 324.3101 et seq. The Authority and the DEQ agree to resolve the violations set forth herein through entry of an Administrative Consent Order (Consent Order).

I. STIPULATIONS

The Authority and the DEQ stipulate as follows:

- 1.1 The NREPA MCL 324.101 et seq., is an act that controls pollution to protect the environment and natural resources in the state.
- 1.2 Pollution Control, Part 31, Water Resources Protection, of the NREPA (Part 31), MCL 324.3101 et seq., and the rules promulgated pursuant thereto, provides for the protection, conservation, and the control of pollution of the water resources of the state.
- 1.3 The DEQ is authorized by Section 3112(4) of Part 31 of the NREPA to enter orders requiring persons to abate pollution, and the director of the DEQ may delegate this authority to a designee under Section 301(b) of the NREPA, MCL 324.301(b).
- 1.4 The Authority consents to the issuance and entry of this Consent Order and stipulates that the entry of this Consent Order constitutes a final order of the DEQ and is enforceable as

such under Section 3112(4) of Part 31. The Authority agrees not to contest the issuance of this Consent Order, and that the resolution of this matter by the entry of this Consent Order is appropriate and acceptable. It is also agreed that this Consent Order shall become effective on the date it is signed by the chief of the WB, Field Operations Division, delegate of the director, pursuant to Section 301(b) of the NREPA.

- 1.5 The Authority and the DEQ agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by the Authority that the law has been violated.
- 1.6 The signatory to this Consent Order on behalf of the Authority agrees and attests that he is fully authorized to assure that the Authority will comply with all requirements under this Consent Order.
- 1.7 The Authority shall achieve compliance with the aforementioned regulations in accordance with the requirements contained in Section III, Compliance Program, of this Consent Order.

II. FINDINGS

- 2.1. On December 18, 1990, the Michigan Department of Natural Resources (DNR), predecessor of the DEQ, and the Authority entered Final Order of Abatement No. DFO-90-011 (DFO), for the purpose of addressing discharges of de-icing fluids to surface waters of the state. The DFO included requirements to provide specific details on de-icing practices implemented by the Authority to the DNR, a schedule and plan for performing monitoring of storm water discharges and a deadline to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for the Airport.
- 2.2. On January 2, 1992, the DNR and the Authority amended the DFO establishing a revised NPDES application deadline and a schedule to perform storm water monitoring at the Airport.

- 2.3. On June 11, 1992, the Authority sent a letter to the DNR committing to implementing a pump and haul program to adequately capture and treat de-icing fluids collected in the Airport's oil and grease separators. The Authority committed to implement the program by September 1, 1992. Based on the information submitted by the Authority to the DNR, the DNR terminated the DFO on January 13, 1994.

- 2.4 On November 18, 2004, the DEQ, Water Bureau (WB) issued Certificate of Coverage (COC) No. MIS510162 under the NPDES General Permit No. MIS510000 (collectively, the Storm Water Permit) to the Authority for operations at the Airport. The COC authorizes the Authority to discharge storm water from the Airport to Swartz Creek in accordance with the terms and conditions of the Storm Water Permit.

- 2.5 On September 27, 2007, the WB performed an inspection of the Airport to evaluate compliance with the Authority's Storm Water Permit. During the WB's inspection, the WB documented a lack of both structural and non-structural controls to prevent discharges of de-icing and anti-icing materials (for the purposes of this document both de-icing and anti-icing materials will be referred to collectively as "de-icing materials" hereinafter) to surface waters of the state. Discharges of de-icing materials to waters of the state are violations of Sections 3109 and 3112 of Part 31.

- 2.6 On March 13, 2008, the WB collected surface water samples at four different locations in the Call Drain, a tributary of Swartz Creek. Table 1 below identifies the sample results that were found during the WB's sampling event. WS-BA-UP sample was collected upstream of the Airport's outfall, on the southern bank of the Call Drain immediately south of Torrey Road. WS-BA-OUT sample was collected directly at the Airport's outfall to the Call Drain. WS-BA-DS sample was collected approximately 50 feet downstream of the Airport's outfall. WS-BA-DS2 sample was collected downstream of the Airport's outfall on the north bank of the Call Drain near the Torrey Road crossing north of Bristol Road.

Table 1: Sample Results

Compound	WS-BA-UP	WS-BA-OUT	WS-BA-DS	WS-BA-DS2
BOD – Carbonaceous 5 days	ND **	760	78	68
BOD – Total 5 days	ND	1100	76	68
Solids – Total Dissolved	980	880	920	1200
Ammonia	.01	.32	.06	.11
Nitrate + Nitrite	1.11	.65	1.05	.89
Conductance	1750	1426	1706	2174
TOC	4.8	410	40	27

The sample results revealed elevated levels of Biochemical Oxygen Demand (BOD) and Total Organic Carbon (TOC) at the Airport's outfall and downstream of the Airport's discharge which is indicative of de-icing material. In addition, the WB observed an abundance of nuisance slime growth in the Call Drain downstream of the Airport's outfall, while no slime growth was observed upstream of the Airport's outfall. Microscopic analysis of the slime growth by the WB's Surface Water Assessment Section confirmed that the slime is a bacterial slime that is indicative of organic carbon enrichment that is typical of glycol discharges to surface waters.

- 2.7 On March 19, 2008, the WB issued to the Authority, Notice Letter (NL), NL-003174, for documented violations of the Authority's Storm Water Permit and Part 31 observed during an inspection performed on March 13, 2008. The NL addressed inadequacies with the Airport's Storm Water Pollution Prevention Plan (SWPPP), exposure of significant materials at the Airport to storm water, and un-permitted discharges of de-icing materials to surface waters of the state. The NL required the Authority to implement necessary revisions to the Airport's SWPPP by April 21, 2008, and to submit a plan to the WB addressing discharges of de-icing materials to surface waters of the state on or before May 1, 2008.

In addition, the WB determined that the Airport requires coverage as a regulated municipal storm sewer system (MS4). The Authority was notified of this requirement by the WB's March 19, 2008, NL.

- 2.8 On April 18, 2008, the Authority submitted a letter outlining revisions to the Airport's SWPPP and proposing a plan to develop a de-icing management and monitoring plan (DMMP) including a timeline for implementation of the DMMP.
- 2.9 On September 16, 2008, the WB sent a letter to the Authority requesting additional information about the DMMP for the Airport including the Authority's long-term structural controls for the Airport's de-icing activities, and the Authority's plan for monitoring storm water discharges at the Airport. The Authority provided a response to the WB's letter on October 9, 2008. The Authority's letter stated that the DMMP would be completed by November 14, 2008. In addition, the Authority indicated that while it was still looking at various alternatives for the de-icing activities, the Authority intended to implement a storm water monitoring program for the 2008-2009 de-icing season.
- 2.10 On November 12, 2008, the Authority sent the WB three copies of the final version of the DMMP.
- 2.11 On March 3, 2009, the WB sent a letter to the Authority requesting additional information about the DMMP for the Airport. In accordance with the WB's March 3, 2009 letter, the Authority responded to the WB on April 3, 2009. The Authority's letter indicated that the Authority intends to design and construct a permanent de-icing pad where all aircraft de-icing activities will be conducted at the Airport. In addition, the Authority indicated that it intends to connect the de-icing pad to Genesee County's sanitary sewer collection system.

III. COMPLIANCE PROGRAM

IT IS THEREFORE AGREED AND ORDERED THAT the Authority shall take the following actions to prevent further violations of Part 31:

- 3.1 Until the Authority can certify in writing in accordance with paragraph 3.5 of this Consent Order that the Airport is effectively controlling or eliminating all discharges of de-icing materials to surface waters of the state, the Authority shall continue to implement the DMMP for the Airport submitted to the WB on November 12, 2008.

3.2 The Authority shall submit to the WB the results of all storm water monitoring that was conducted by the Authority during the 2008-2009 de-icing season in accordance with the DMMP at the Airport's outfalls to the Call Drain and Swartz Creek, not later than **10 days after the effective date of the Consent Order**.

3.3 The Authority shall submit an approvable Corrective Action Work Plan to the WB not later than **30 days after the effective date of the Consent Order**, including details of corrective actions that will be implemented at the Airport to effectively control or eliminate all discharges of de-icing materials to surface waters of the state. The work plan shall include, but not be limited to:

- A schedule for installing long-term structural controls for the purpose of adequately capturing and treating all de-icing materials applied to aircraft.
- Implementation of measures to adequately control the discharge of de-icing materials applied to the Airport's apron, ramps, taxiways and runways.
- Implementation of measures to reduce and/or eliminate the use of urea-based pavement de-icing materials.

Upon approval by the WB, the Corrective Action Work Plan shall become an enforceable component of this Consent Order.

3.4 The Authority shall submit an approvable Monitoring Work Plan to the WB not later than **30 days after the effective date of the Consent Order**, to evaluate the performance of long-term structural controls and best management practices utilized at the Airport in accordance with Paragraphs 3.1 and 3.3 above. The monitoring work plan shall include, but not be limited to:

- A schedule to sample and analyze all storm water flows receiving run-off from de-icing material application areas (including, but not limited to, runways, taxiways and apron areas) before discharging to surface waters of the state. The monitoring work plan

shall encompass at least one active de-icing season following completion of the approved Corrective Action Work Plan required by Paragraph 3.3, above.

- Identification of all monitoring locations where samples will be collected.
- Identification of the frequency of sample collection.
- Parameters to be sampled shall include, but not be limited to, COD, CBOD-5, dissolved oxygen, ammonia nitrogen, Total Kjeldahl nitrogen, pH, and temperature.

Upon approval by the WB, the Monitoring Work Plan shall become an enforceable component of this Consent Order.

- 3.5 **Not later than 60 days after the completion of the approved Monitoring Work Plan**, the Authority shall submit to the WB for review and approval a Monitoring Work Plan report. The report shall include the results of the Monitoring Work Plan and an assessment of the effectiveness of the corrective actions implemented at the Airport. The report shall be signed by the appropriate representative of the Authority, certifying that the Airport is effectively controlling or eliminating all discharges of de-icing materials to surface waters of the state. If the Authority is not able to certify to this standard, the Authority shall submit **within 60 days** of the Monitoring Work Plan report due date, an approvable Corrective Action Program work plan to the WB.
- 3.6 In accordance with Rule 2191 of Part 21 Rules, the WB may, at any time, require the Airport to apply for and obtain an individual NPDES permit.
- 3.7 **Not later than 30 days after the effective date of this Consent Order**, the Authority shall submit to the WB an administratively complete permit application to obtain MS4 permit coverage or in the alternative a letter from a nesting MS4 permittee identifying the Airport as a nested jurisdiction along with an agreement with the nesting MS4 permittee on how the MS4 requirements will be met.
- 3.8 If the WB requires additional information from or action by the Authority at any point during the permitting process to correct deficiencies in the permit application required by Paragraph 3.7, above, then the WB will notify the Authority in writing of the deficiencies.

The Authority shall correct all deficiencies and report all requested information not later than 30 days from receipt of notice from the WB, unless another date is specified in the notification.

- 3.9 If the Authority is required to obtain MS4 permit coverage from the WB, for Calendar Year 2010 (January 1, 2010, through December 31, 2010), and each calendar year thereafter until the WB issues a final decision on the Authority's MS4 permit application, the Authority shall pay the annual permit fee in accordance with Part 31. An invoice will be sent to the Authority in accordance with the schedule contained in Part 31.
- 3.10 The Authority shall submit all reports, work plans, specifications, schedules, or any other writing required by this section to the Lansing District Supervisor, WB, DEQ, 4th Floor, North Tower, 525 West Allegan Street, Lansing, Michigan 48909. The cover letter with each submittal shall identify the specific paragraph and requirement of this Consent Order that the submittal is intended to satisfy.

IV. DEQ APPROVAL OF SUBMITTALS

- 4.1 For any work plan, proposal, or other document, excluding applications for permits or licenses, that are required by this Consent Order to be submitted to the DEQ by the Authority, the following process and terms of approval shall apply.
- 4.2 All work plans, proposals, and other documents required to be submitted by this Consent Order shall include all of the information required by the applicable statute and/or rule, and all of the information required by the applicable paragraph(s) of this Consent Order.
- 4.3 In the event the DEQ disapproves a work plan, proposal, or other document, it will notify the Authority, in writing, specifying the reasons for such disapproval. The Authority shall submit, within 30 days of receipt of such disapproval, a revised work plan, proposal, or other document which adequately addresses the reasons for the DEQ's disapproval. If the revised work plan, proposal, or other document is still not acceptable to the DEQ, the DEQ will notify the Authority of this disapproval.

- 4.4 In the event the DEQ approves with specific modifications, a work plan, proposal, or other document, it will notify the Authority, in writing, specifying the modifications required to be made to such work plan, proposal, or other document prior to its implementation and the specific reasons for such modifications. The DEQ may require the Authority to submit, prior to implementation and within 30 days of receipt of such approval with specific modifications, a revised work plan, proposal, or other document which adequately addresses such modifications. If the revised work plan, proposal, or other document is still not acceptable to the DEQ, the DEQ will notify the Authority of this disapproval.
- 4.5 Upon DEQ approval, or approval with modifications, of a work plan, proposal, or other document, such work plan, proposal, or other document shall be incorporated by reference into this Consent Order and shall be enforceable in accordance with the provisions of this Consent Order.
- 4.6 Failure by the Authority to submit an approvable work plan, proposal, or other document, within the applicable time periods specified above, constitutes a violation of this Consent Order and shall subject the Authority to the enforcement provisions of this Consent Order, including the stipulated penalty provisions specified in paragraph 9.3.
- 4.7 Any delays caused by the Authority's failure to submit an approvable work plan, proposal, or other document when due shall in no way affect or alter the Authority's responsibility to comply with any other deadline(s) specified in this Consent Order.
- 4.8 No informal advice, guidance, suggestions, or comments by the DEQ regarding reports, work plans, plans, specifications, schedules or any other writing submitted by the Authority will be construed as relieving the Authority of its obligation to obtain written approval, if and when required by this Consent Order.

V. EXTENSIONS

- 5.1 The Authority and the DEQ agree that the DEQ may grant the Authority a reasonable extension of the specified deadlines set forth in this Consent Order. Any extension shall be preceded by a written request in duplicate to the DEQ, WB, Enforcement Unit Chief, Constitution Hall, 525 West Allegan Street, Lansing, Michigan 48909-7773, and the Lansing District Supervisor at the address in paragraph 3.10, no later than ten business days prior to the pertinent deadline, and shall include:
- a. Identification of the specific deadline(s) of this Consent Order that will not be met.
 - b. A detailed description of the circumstances that will prevent the Authority from meeting the deadline(s).
 - c. A description of the measures the Authority has taken and/or intends to take to meet the required deadline.
 - d. The length of the extension requested and the specific date on which the obligation will be met.

The district supervisor, in consultation with the Enforcement Unit Chief, shall respond in writing to such requests. No change or modification to this Consent Order shall be valid unless in writing from the DEQ, and if applicable, signed by both parties.

VI. REPORTING

- 6.1 The Authority shall verbally report any violation(s) of the terms and conditions of this Consent Order to the Lansing District Supervisor by no later than the close of the next business day following detection of such violation(s) and shall follow such notification with a written report within five business days following detection of such violation(s). The written report shall include a detailed description of the violation(s), as well as a description of any actions proposed or taken to correct the violation(s). The Authority shall report any anticipated violation(s) of this Consent Order to the above-referenced individual in advance of the relevant deadlines whenever possible.

VII. RETENTION OF RECORDS

- 7.1 Upon request by an authorized representative of the DEQ, the Authority shall make available to the DEQ all records, plans, logs, and other documents required to be maintained under this Consent Order or pursuant to Part 31 or its rules. All such documents shall be retained by the Authority for at least a period of three years from the date of generation of the record unless a longer period of record retention is required by Part 31 or its rules.

VIII. RIGHT OF ENTRY

- 8.1 The Authority shall allow any authorized representative or contractor of the DEQ, upon presentation of proper credentials, to enter upon the premises of the facility at all reasonable times for the purpose of monitoring compliance with the provisions of this Consent Order. This paragraph in no way limits the authority of the DEQ to conduct tests and inspections pursuant to the NREPA and the rules promulgated thereunder, or any other applicable statutory provision.

IX. PENALTIES

- 9.1 The Authority agrees to pay to the State of Michigan **\$4,435 DOLLARS** as partial compensation for the cost of investigations and enforcement activities arising from the violations specified in Section II of this Consent Order. Payment shall be made within 30 days of the effective date of this Consent Order in accordance with paragraph 9.7.
- 9.2 The Authority agrees to pay a civil fine of **\$19,500 DOLLARS** for the violations specified in Section II of this Consent Order. Payment shall be made within 30 days of the effective date of this Consent Order in accordance with paragraph 9.7.
- 9.3 For each failure to comply with a specific deadline contained in Section III or Section IV of this Consent Order, the Authority shall pay stipulated penalties of **\$5,000**. If, after 30 days from the original deadline, the Authority has not fully corrected the violation, stipulated

penalties shall begin to accrue in accordance with paragraph 9.4 of this Consent Order.

- 9.4 Except as provided for in paragraph 9.3, for each failure to comply with a provision of Section III or IV of this Consent Order, the Authority shall pay stipulated penalties of **\$200** per violation per day for 1 to 7 days of violation, **\$300** per violation per day for 8 to 14 days of violation, and **\$500** per violation per day for each day of violation thereafter.
- 9.5 For each failure to comply with a provision of Section VI, VII, or VIII of this Consent Order, or any other requirement of this Consent Order, the Authority shall pay stipulated penalties of **\$200** per violation per day for each day of violation.
- 9.6 To ensure timely payment of the above civil fine, costs, and stipulated penalties, the Authority shall pay an interest penalty to the General Fund of the State of Michigan each time it fails to make a complete or timely payment. This interest penalty shall be based on the rate set forth at MCL 600.6013(8), using the full increment of amount due as principal, and calculated from the due date for the payment until the delinquent payment is finally made in full.
- 9.7 The Authority agrees to pay all funds due pursuant to this agreement by check made payable to the State of Michigan and delivered to the DEQ, Revenue Control Unit, P.O. Box 30657, Lansing, Michigan 48909-8157. To ensure proper credit, all payments made pursuant to this Consent Order must include the **Payment Identification No. WTR-3114**.
- 9.8 The Authority agrees not to contest the legality of the civil fine or costs paid pursuant to paragraphs 9.1, and 9.2, above. The Authority further agrees not to contest the legality of any stipulated penalties or interest penalties assessed pursuant to paragraphs 9.3, 9.4, and 9.5, above, but reserves the right to dispute the factual basis upon which a demand by the DEQ for stipulated penalties or interest penalties is made.

X. FORCE MAJEURE

- 10.1 The Authority shall perform the requirements of this Consent Order within the time limits established herein, unless performance is prevented or delayed by events that constitute a "Force Majeure." Any delay in the performance attributable to a "Force Majeure" shall not be deemed a violation of the Authority's obligations under this Consent Order in accordance with this section.
- 10.2 For the purpose of this Consent Order, "Force Majeure" means an occurrence or nonoccurrence arising from causes not foreseeable, beyond the control of, and without the fault of the Authority, such as: an Act of God, untimely review of permit applications or submissions by the DEQ or other applicable authority, and acts or omissions of third parties that could not have been avoided or overcome by the Authority's diligence and that delay the performance of an obligation under this Consent Order. "Force Majeure" does not include, among other things, unanticipated or increased costs, changed financial circumstances, or failure to obtain a permit or license as a result of the Authority's actions or omissions.
- 10.3 The Authority shall notify the DEQ, by telephone, within 48 hours of discovering any event that causes a delay in its compliance with any provision of this Consent Order. Verbal notice shall be followed by written notice within ten calendar days and shall describe, in detail, the anticipated length of delay, the precise cause or causes of delay, the measures taken by the Authority to prevent or minimize the delay, and the timetable by which those measures shall be implemented. The Authority shall adopt all reasonable measures to avoid or minimize any such delay.
- 10.4 Failure of the Authority to comply with the notice requirements and time provisions under paragraph 10.3 shall render this Section X void and of no force and effect as to the particular incident involved. The DEQ may, at its sole discretion and in appropriate circumstances, waive in writing the notice requirements of paragraph 10.3, above.

- 10.5 If the parties agree that the delay or anticipated delay was beyond the control of the Authority, this may be so stipulated, and the parties to this Consent Order may agree upon an appropriate modification of this Consent Order. However, the DEQ is the final decision-maker on whether or not the matter at issue constitutes a force majeure. The parties to this Consent Order understand and agree that the final decision by the DEQ regarding a force majeure claim is not subject to judicial review. The burden of proving that any delay was beyond the reasonable control of the Authority, and that all the requirements of this Section X have been met by the Authority, rests with the Authority.
- 10.6 An extension of one compliance date based upon a particular incident does not necessarily mean that the Authority qualifies for an extension of a subsequent compliance date without providing proof regarding each incremental step or other requirement for which an extension is sought.

XI. GENERAL PROVISIONS

- 11.1 With respect to any violations not specifically addressed and resolved by this Consent Order, the DEQ reserves the right to pursue any other remedies to which it is entitled for any failure on the part of the Authority to comply with the requirements of the NREPA and its rules.
- 11.2 The DEQ and the Authority consent to enforcement of this Consent Order in the same manner and by the same procedures for all final orders entered pursuant to Part 31, MCL 324.3101 et seq.; and enforcement pursuant to Part 17, Michigan Environmental Protection Act, of the NREPA, MCL 324.1701 et seq.
- 11.3 This Consent Order in no way affects the Authority's responsibility to comply with any other applicable state, federal, or local laws or regulations.
- 11.4 The WB reserves its right to pursue appropriate action, including injunctive relief to enforce the provisions of this Consent Order, and at its discretion, may also seek stipulated fines or statutory fines for any violation of this Consent Order. However, the WB is precluded from

seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.

- 11.5 Nothing in this Consent Order is or shall be considered to affect any liability the Authority may have for natural resource damages caused by the Authority's ownership and/or operation of the facility. The State of Michigan does not waive any rights to bring an appropriate action to recover such damages to the natural resources.
- 11.6 In the event the Authority sells or transfers the facility, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within 30 calendar days, the Authority shall also notify the WB Lansing District Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. The purchaser and/or transferee of this Consent Order must agree, in writing, to assume all of the obligations of this Consent Order. A copy of that agreement shall be forwarded to the WB Lansing District Supervisor within 30 days of assuming the obligations of this Consent Order.
- 11.7 The provisions of this Consent Order shall apply to and be binding upon the parties to this action, and their successors and assigns.
- 11.8 This Consent Order constitutes a civil settlement and satisfaction as to the resolution of the violations specifically addressed herein; however, it does not resolve any criminal action that may result from these same violations.

XII. TERMINATION

- 12.1 This Consent Order shall remain in full force and effect until terminated by a written Termination Notice (TN) issued by the DEQ. Prior to issuance of a written TN, the Authority shall submit a request consisting of a written certification that the Authority has fully complied with the requirements of this Consent Order and has made payment of any fines,

including stipulated penalties, required in this Consent Order. Specifically, this certification shall include:

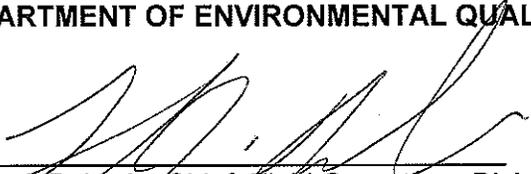
- a. The date of compliance with each provision of the compliance program in Section III, and the date any fines or penalties were paid.
- b. A statement that all required information has been reported to the district supervisor.
- c. Confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at the facility.

The DEQ may also request additional relevant information. The DEQ shall not unreasonably withhold issuance of a TN.

Signatories

The undersigned CERTIFY they are fully authorized by the party they represent to enter into this Consent Order to comply by consent and to EXECUTE and LEGALLY BIND that party to it.

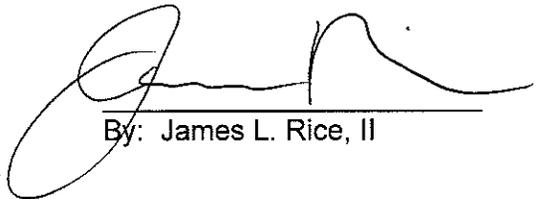
DEPARTMENT OF ENVIRONMENTAL QUALITY



Frank J. Baldwin, Chief, Field Operations Division
Water Bureau

10/14/09
Date

BISHOP INTERNATIONAL AIRPORT AUTHORITY



By: James L. Rice, II

Title: Airport Director
10-9-09
Date

APPROVED AS TO FORM:



By: Alan F. Hoffman, Assistant Attorney General
For: S. Peter Manning, Chief
Environment, Natural Resources, and Agriculture Division
Michigan Department of Attorney General

10/12/09
Date