STORMWATER POLLUTION PREVENTION PLAN

Prepared For: Westlake Pipe & Fittings 401 Industrial Park Road Booneville, MS 38829

Prepared By: CIVIL & ENVIRONMENTAL CONSULTANTS, INC. Austin, Texas

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CEC Project 323-022

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1.0 STORM WATER POLLUTION PREVENTION PLAN OVERVIEW

1.1 INTRODUCTION

This Storm Water Pollution Prevention Plan (SWP3 or Plan) covers the operations of the Westlake Pipe & Fittings (WPF) facility located at 401 Industrial Park Drive in Booneville, Prentiss County, Mississippi. This plan was prepared in accordance with the requirements of the Mississippi Department of Environmental Quality (MDEQ) Industrial Storm Water General Permit for Industrial Activities No. MSR00 (General Permit) under the National Pollutant Discharge Elimination System (NPDES).

All reports, records, and certifications that are made as part of this SWP3 will be signed by a responsible official or duly authorized representative who has responsibility for the facility's overall operations and environmental matters. The signed records and certifications will be retained onsite at all times up to at least one year after coverage under this permit expires. A copy of the plan, reports, and records will be made available to authorized MDEQ or USEPA personnel upon request.

1.2 GENERAL FACILITY INFORMATION

Name of Facility: Westlake Pipe & Fittings
Facility Address: 401 Industrial Drive

Booneville, MS 38829

Site Contact: Brian Thrasher, Plant Manager

Telephone: (662) 720-4888

Permit Effective Dates: December 10, 2020 – November 30, 2025

Standard Industrial Classification (SIC) Code: 3084 Number of Storm Water Outfalls: 9

Receiving Waters: Tuscumbia River

The facility receives polyvinylchloride (PVC) resins, calcium carbonate filler, stabilizer oil, liquid colorant, and other ingredients for the production of PVC pipe. Extruded PVC pipe is finished and stored on site, until it is shipped to customers. In support of these operations, the facility stores oils, liquid colorants, and anti fungal water treatment chemicals.

1.3 OBJECTIVES

The United States Environmental Protection Agency (USEPA) published regulations in November 1990 to regulate point source storm water discharges from certain industries under the NPDES permit program. The MDEQ is the state's permitting authority for these regulations and exercises its authority under state law. The goal of the storm water permit program is to improve water quality by reducing the amount of pollutants contained in storm water runoff from industrial facilities. WPF is required to obtain coverage under a storm water permit since it conducts

industrial activities with a Standard Industrial Classification (SIC) code of 3084. The facility's operations meet the requirement of the state's general storm water permit to prepare and implement an SWP3 for applicable industrial facilities that discharge storm water.

There are four objectives of this Plan:

- (1) To identify actual and potential sources of pollution that may reasonably be expected to affect the quality of storm water discharges;
- (2) To describe and ensure implementation of practices that will (a) prevent or effectively reduce pollution in storm water discharges from the facility and (b) ensure compliance with the terms and conditions of the General Permit;
- (3) To describe how the selected practices and controls are appropriate and how each will prevent or effectively reduce pollution; and
- (4) To discuss how controls and practices relate to each other such that they comprise an integrated, facility-wide approach for pollution prevention in storm water discharges.

1.4 OBJECTIVES

In order to meet the requirements of the General Permit, this Plan contains the following elements:

- Section 2.0: Storm Water Pollution Prevention Team Individuals familiar with the operations at the facility and those with operational control are identified. The team will be responsible for implementing, maintaining, and revising this plan.
- Section 3.0: Description of Potential Pollutants and Sources Existing industrial activities and significant materials exposed to storm water are identified and described as well as specified pollutants which may be present in the storm water runoff. Existing management practices and control measures employed at the facilities to minimize storm water pollutants are also identified. This section includes a site map which graphically identifies outfalls, structures, and other physical features.
- Section 4.0: Pollution Prevention Measures and Controls This section describes and
 discusses the following elements of pollution prevention measures: good housekeeping
 measures, spill prevention and response measures, erosion control measures, maintenance
 programs for structural controls, best management practices, employee training programs,
 inspections, visual monitoring, and recordkeeping.
- Section 5.0 Monitoring, Sampling, Plan Updates, and Annual Facility Site Compliance Inspection Procedures for the required annual facility site compliance inspection and report are outlined. Visual monitoring, sampling requirements, and conditions for updating the plan are presented.
- Section 6.0 SWP3 Certification This Plan has been signed and certified by a responsible corporate officer or duly authorized representative.

2.0 STORM WATER POLLUTION PREVENTION TEAM

The Storm Water Pollution Prevention Team will be responsible for developing, implementing, maintaining, and revising this Plan. The members of the team will be familiar with and have control of the management and operations of the facility. Table 1 lists the members of the team and identifies their primary responsibilities.

Table 1: Pollution Prevention Team

PERSONNEL	TITLE	RESPONSIBILITY
Brian Thrasher	Plant Manager	 Team chairperson. Proposes revisions and updates to SWP3 Approves revisions and updates to SWP3. Has signatory authority for this SWP3.
	Quality/Training Supervisor	 Responsible for recordkeeping, report submittals. Collects storm water samples. BMP* Implementation. Performs annual and routine visual inspections. Proposes revisions and updates to SWP3. Conduct annual employee training.
Kevin Shelton	Maintenance Superintendent	 Responsible for recordkeeping, report submittals. Collects storm water samples. BMP* Implementation. Performs annual and routine visual inspections. Proposes revisions and updates to SWP3. Conduct annual employee training.
	Quality Assurance	 Responsible for recordkeeping, report submittals. Collects storm water samples. BMP* Implementation. Performs annual and routine visual inspections. Proposes revisions and updates to SWP3. Conduct annual employee training.

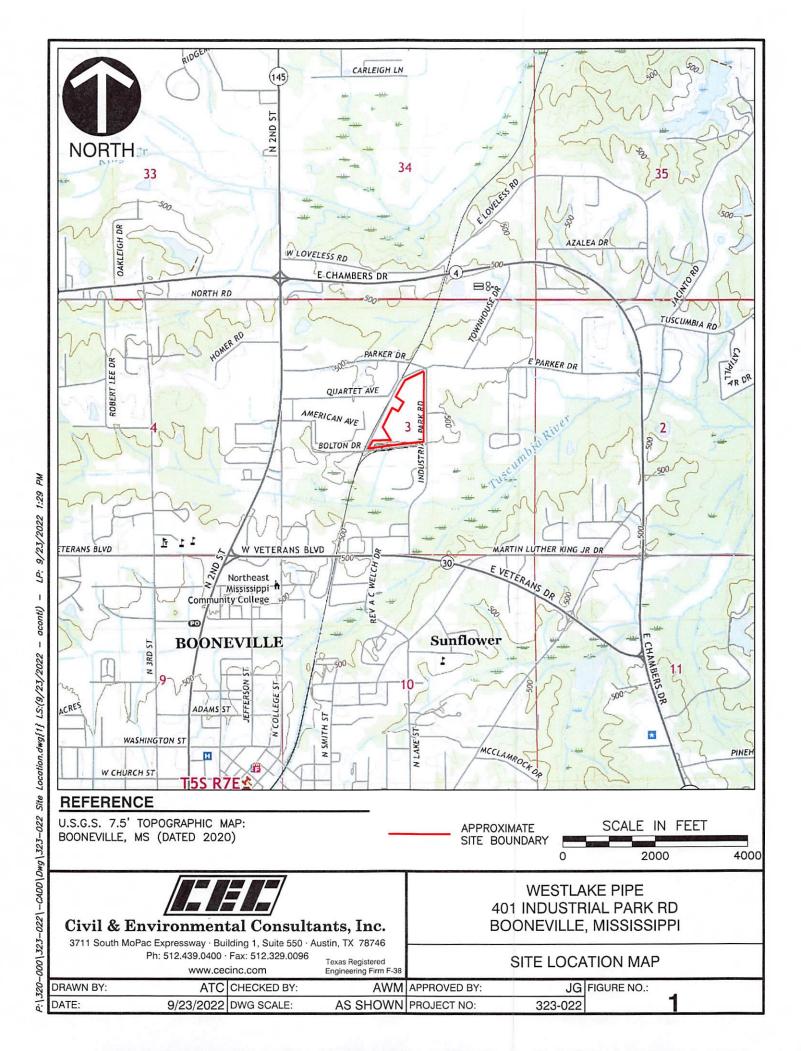
^{*} BMP = Best Management Practice (See Section 4.0 for a description of BMPs)

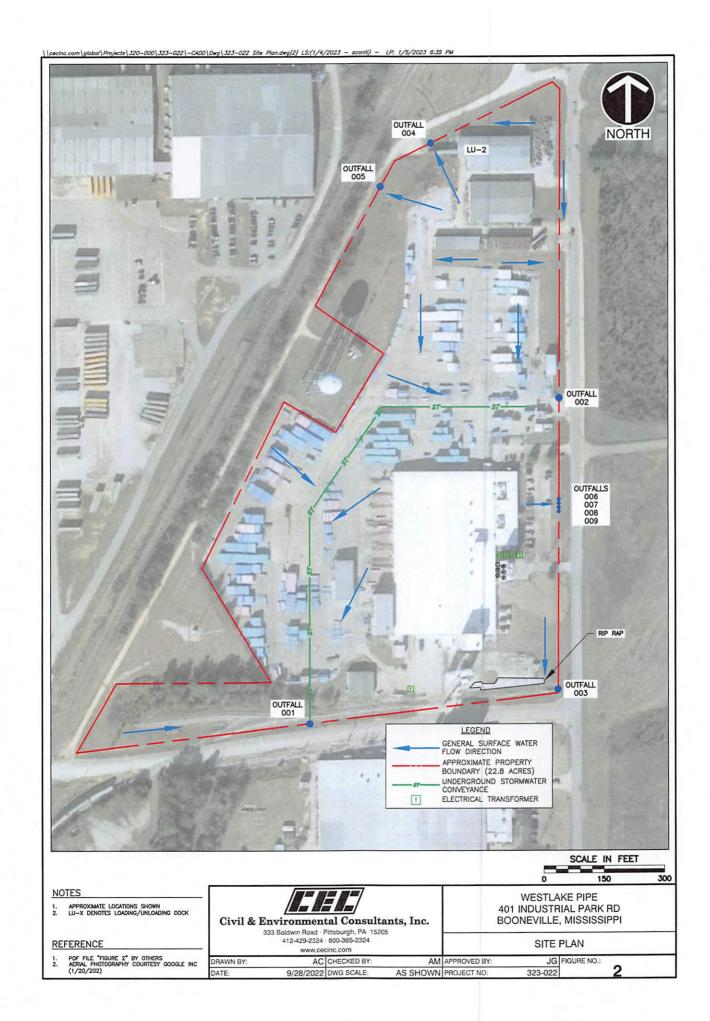
3.0 DESCRIPTION OF POTENTIAL POLLUTANTS AND SOURCES

3.1 SITE LOCATION MAP AND PLOT PLAN

Figure 1 presents a site map showing the facility's location and surrounding topography. Figure 2 presents a plot plan of the entire property. The figure presents the following features required by the General Permit as listed below.

- Surface water bodies;
- Drainage area of each stormwater outfall identified by number;
- Direction of flow for each area;
- Facility property boundary;
- Location of existing structural and nonstructural control measures to reduce pollutants
- in storm water runoff;
- Location of any stormwater treatment activities;
- Location of storm drain inlets;
- Stormwater conveyances;
- Locations of industrial activities that are exposed to precipitation;





3.2 INVENTORY OF EXPOSED MATERIALS

The General Permit requires a general inventory of significant materials handled at the facility which are or may potentially be exposed to storm water. It also requires a brief description of activities and potential sources of pollutants that may reasonably be expected to add pollutants to storm water discharges. These materials and activities are listed and described below.

- Raw Materials;
- Plant Trash and Process Related Trash;
- Final Product Storage;
- New/Used Oils and Liquid Colorant;
- Vehicle Use and Maintenance;

Raw Materials. The facility receives PVC resin and calcium carbonate filler via tank trucks. The trucks arrive on site at the south gate, quick connect to the dedicated transfer hose and transferred to storage silos or storage tanks. Leaks from the transfer process have the potential for exposure to storm water. Other ingredients such as stabilizer oil and liquid colorant are delivered in 300 gallon totes and stored indoors until empty.

Plant Trash and Process Related Trash. The facility has one covered trash compactor/roll off box and one uncovered roll off box that stores solid waste. PVC pipe grindings were observed on the ground around both roll off boxes which have the potential for exposure to storm water. There are additional, smaller open top waste bins and hoppers which contain plant trash and process related waste such as PVC pipe grindings. These also have the potential for exposure to storm water.

The facility stores empty totes of liquid colorant outdoors, along the southern fenceline. These storage containers are eventually picked up by vendors. Though mostly empty, these containers may have small drips or leaks that have the potential for exposure to storm water.

Final Product Storage. Final PVC pipe product is stacked and stored in the storage yard, which has the potential for exposure to storm water.

New/Used Oils and Liquid Colorant. The facility receives new storage drums or totes of gear oils, hydraulic oils, compressor fluid, and liquid colorant. These items are transferred from vendor vehicles via forklift and stored indoors. The storage of the fluids does not have the potential for exposure to storm water, but the transfers off vendor vehicles do.

Vehicle Use and Maintenance. The facility utilizes several small propane fired forklifts which are maintained off site. Vehicles may have small drips or leaks that have the potential for exposure to storm water.

The majority of the property paved with concrete or asphalt. The topography of the property is relatively flat, though Figures 1 and 2 indicate that drainage generally flows to the south and east. Figure 2 illustrates that storm water runoff flows offsite in all four directions. Channelized flow exists at the property, and there are nine individual outfalls. Precipitation falling on the western portion of the pipe storage yard will typically flow into the below grade storm drainage system which exits the facility on the southern property line as Outfall 001. Precipitation falling on the northern portion of the pipe storage yard will typically flow into the same below grade drainage system and flow to the east, going underneath Industrial Drive and exiting the drainage system on the eastern side of Industrial Drive as Outfall 002. Outfall 003 is located at the southeastern corner of the property and receives storm water falling on the southeastern parking lot. Storm water falling on the northernmost portion of the property may flow offsite through Outfalls 004 or 005. Outfalls 006, 007, 008, and 009 are concrete troughs that route stormwater from the eastern parking lot across the eastern property line. It should be noted that these four outfalls are each spaced approximately twenty (20) apart from each other and are considered to be substantially similar outfalls. All outfalls flow into unnamed tributaries of the Tuscumbia River, which lies approximately 2,200 feet east of the facility.

3.3 SAMPLING DATA, SPILLS, AND LEAKS

The General Permit requires a summary of available storm water sampling data or other observations that could be useful in characterizing the quality of storm water discharges or identifying sources of storm water contamination. Any results of storm water sampling will be kept with this SWP3. WPF has not had any reportable spills or leaks of toxic or hazardous pollutants in areas exposed to runoff within the last three years.

3.4 RISK IDENTIFICATION AND SUMMARY OF POTENTIAL POLLUTANT SOURCES

Potential storm water pollution sources or activities at the Booneville facility are listed below and summarized in Table 3.

- Loading and Unloading;
- Outdoor Storage;
- Outdoor Manufacturing or Processing;
- Significant Dust or Particulate Generating Processes; and
- On Site Waste Storage Practices.

Table 2: Summary of Potential Pollutant Sources

SIGNIFICANT EXPOSED SOURCE AREAS	SOURCES OF EXPOSED MATERIALS	POTENTIAL STORM WATER POLLUTANTS
Loading and Unloading	 Transfers of bulk liquid from tank trucks Transfers of storage totes and drums Waste pickup 	 VOC PAH O&G TSS
Outdoor Storage	New/Used oil Full/Empty storage totes and drums Final product pipe	 VOC PAH O&G TSS
Outdoor Manufacturing or Processing	Pipe grindingWater chilling	TSS Water additives
Dust or Particulate Generating Processes	 Vehicle traffic Pipe grinding	• TSS
On site Waste Storage	Trash dumpsters / Roll off boxes	• TSS • O&G • VOC

Note: VOCs = volatile organic compounds, PAHs = polycyclic aromatic hydrocarbons, O&G = oil & grease, TSS = Total Suspended Solids

4.0 POLLUTION PREVENTION MEASURES AND CONTROLS

Storm water management measures and controls, also called Best Management Practices (BMPs), will be implemented to minimize the amount of pollutants in the storm water discharges from NAPCO's facility. Proposed storm water BMPs are listed and discussed below and partially summarized in Table 4.

- Good housekeeping,
- Preventive maintenance,
- Spill prevention and response procedures,
- Quarterly visual inspections,
- Employee training and education,
- Recordkeeping and internal reporting procedures,
- Identification of non-storm water discharges,
- Sediment and erosion control, and
- Management of runoff.

4.1 GOOD HOUSEKEEPING

Good housekeeping practices are intended to maintain areas in a clean and orderly manner, limit the discharge of debris, minimize the number of empty 55-gallon drums and storage totes on site, and minimize the generation of dust. These practices generally involve limiting the exposure of potential pollution sources to storm water by removing the source or storing it in a covered building. Appropriate good housekeeping BMPs for the facility are listed in Table 4.

4.2 PREVENTIVE MAINTENANCE

The recommended preventive maintenance program for WPF includes inspection, testing, and maintenance of equipment that could fail or leak, resulting in a potential discharge of pollutants to storm water. Appropriate preventive maintenance procedures are listed in Table 4.

4.3 SPILL PREVENTION AND RESPONSE

Potential pollution sources which could spill or leak will be visually inspected on a regular basis. Drums, tanks, totes, and other containers will be clearly labeled. All observed spills or leaks will be immediately contained by drip pans, absorbent materials or other appropriate methods and subsequently cleaned up. Vehicles and equipment that are scheduled for maintenance and have a potential for fluid leaks are confined to dedicated areas such as the repair area.

Materials and equipment necessary for spill clean up will be made available to facility personnel. Leaks will be repaired as soon as practicable. All affected employees will be periodically trained and informed of their responsibilities to control leaks and spills and of the proper notification and clean-up procedures. Appropriate spill prevention and response practices to be implemented are presented in Table 4.

Should a significant spill or leak occur resulting in a release containing a hazardous substance in an amount equal to or in excess of a reporting quantity established by either 40 CFR §117 or 40 CFR §302, the facility will make notification as required in 40 CFR §302.6 including immediate notification of the National Response Center (1-800-424-8802).

4.4 MONTHLY VISUAL INSPECTIONS

Qualified personnel who are familiar with the industrial activities performed at the facility will conduct monthly inspections to determine the effectiveness of the BMPs presented in this section and in Table 4. The inspection will identify evidence of pollutants entering the storm water drainage system and any existing BMP that is not being properly or completely implemented. Appendix A presents MDEQ's inspection report form. The inspections will be conducted for the following areas:

- Vehicle Equipment Areas;
- Good Housekeeping BMPs;
- Spill Response and Equipment;
- General Material Storage Areas;
- Storm Water BMPs and Treatment Structures;
- Observations of Storm Water Discharges.

A summary of all revisions to the SWP3 that are recommended as a result of these inspections will be included on the inspection report. The summary will also include a time schedule to implement the proposed changes. The report will be made readily available to MDEQ personnel upon request.

4.5 MONTHLY VISUAL MONITORING

In addition to or as part of the monthly visual inspection, the Pollution Prevention Team or its designee will conduct monthly visual monitoring of discharges from each outfall (visual jar test). Monitoring will be conducted during hours of normal operation either during or after a storm event. Samples will be collected in a clean, clear, glass or plastic jar and examined in a well lit area. Though WPF prefers to collect samples for monitoring within the first 30 minutes of discharge, collection may not be practicable within the first 30 minutes. In such cases, WPF will document the reason and collect samples within the first hour of discharge.

A monthly monitoring report will be completed each time monitoring is conducted. The report will document the following:

- Facility name;
- Date and time of sample collection and examination;
- Location of sample;
- Name of inspector who collected and examined the sample;
- Nature of the discharge (runoff, snow melt, etc.);
- Results of sample observation: odor, color, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, or other indicators of storm water pollution;
- Probable pollution sources identified; and
- Corrective actions needed to control the sources.

Appendix B presents a form that the facility will use for each monthly visual monitoring and examination.

4.6 EMPLOYEE TRAINING AND EDUCATION

Training will be provided to all employees responsible for implementing or maintaining activities identified in the SWP3. Employee training sessions will be conducted on an annual basis, and the following subjects will be addressed in the training program.

- Proper material management and handling practices for specific chemicals, fluids, and other materials used or commonly encountered at the facility;
- Spill prevention methods;
- Fueling procedures;
- General good housekeeping practices;
- Proper painting, grinding, abrasive blasting, and other maintenance activities;
- Location of materials and equipment necessary for spill clean up;
- Spill clean up techniques;
- Proper spill reporting procedures; and
- Familiarization with BMPs and goals of the SWP3.

Appendix C presents an employee training worksheet.

4.7 RECORDKEEPING AND INTERNAL REPORTING PROCEDURES

All reports, checklists, and records will be retained with this SWP3 onsite for a minimum of three years. All results of monitoring for determining compliance with numeric effluent limitations will be recorded and kept onsite.

A description of any incident, such as a spill or other discharge, will also be retained with this SWP3. The Plan and records retained with it will be made available, upon request, to an MDEQ-authorized representative.

4.8 EVALUATION OF NON-STORM WATER DISCHARGES

WPF's Pollution Prevention Team or its designee will evaluate all outfalls for authorized, non-storm water discharges. The evaluation will take place during a dry weather period and will be representative of non-storm water discharges from the facility. WPF will eliminate any unauthorized non-storm water discharge or it will have the discharge authorized under a separate permit. Appendix D presents an evaluation form for non-storm water discharges. WPF will maintain the evaluation form onsite. The General Permit authorizes the following non-storm water discharges through WPF's outfalls:

- Discharges from fire-fighting activities;
- Uncontaminated fire hydrant flushing;
- Potable water and water line flushing;
- Irrigation drainage;
- Uncontaminated ground water or spring water;
- Foundation or footing drains with uncontaminated flows;
- Uncontaminated air conditioner condensate, compressor condensate, steam condensate, and condensate from the outside storage of refrigerated gases or liquids;
- Landscape watering, provided that all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling;
- Pavement wash water where no detergents or other chemicals are used and where no spills
 or leaks of toxic or hazardous materials have occurred (unless all spilled material has been
 removed);
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but excluding intentional discharges from the cooling tower (e.g. blowdown or draining); and
- Routine external building washdown that does not use detergents or other chemicals.

4.9 SEDIMENT AND EROSION CONTROLS

The vegetated areas of the site will be maintained to prevent erosion and minimize the loss of sediment carried with storm water.

4.10 STORM WATER MANAGEMENT CONTROLS

Storm water management controls are practices (other than those which control the source of pollutants) used to divert, infiltrate, reuse, contain, or otherwise manage the discharge of pollutants in runoff. The General Permit requires that these additional storm water management practices be considered where reasonable and appropriate. Specific storm water management practices to be considered include: vegetative swales and practices, reuse of collected storm water (irrigation, dust control, inlet controls (such as inlet filters or oil water separators), snow management activities, infiltration devices, and wet detention/retention devices.

Existing Non-Structural Storm Water Controls

The procedures listed below are used to minimize effects to storm water runoff.

Leaks and spills to soil are contained using appropriate oil absorbent materials and are cleaned as soon as practical.

Drip pans are placed under equipment and vehicles during routine maintenance to contain leaks and spills.

Existing Structural Storm Water Controls

The southern edge of the property lined with small rocks to impede flow off site.

Liquids are stored indoors.

Vegetated areas are maintained to prevent erosion.

Emission control devices are used to minimize particulate emissions and settling.

Table 3: Proposed Best Management Practices

GOOD HOUSEKEEPING

- a. Areas where materials are transferred to or from the facility and potentially exposed to storm water will be kept clean. Spills of these materials will be cleaned promptly to minimize the effect on storm water.
- b. Spills of PVC pipe grindings will be cleaned up promptly.
- c. Drums and totes stored where they might be affected by storm water will have secure lids or tops with all bungs tightly in place. Their outer surfaces will be cleaned. They will be maintained to prevent contamination of storm water, and they will be properly labeled.

PREVENTIVE MAINTENANCE

- a. Any identified defective equipment owned or operated by WPF will be immediately repaired or replaced.
- b. Vehicles and operating equipment will be kept in good repair with all fluid reservoirs and fluid filled lines inspected for cracks and leaks on a monthly basis; oil changes and lubrication will be performed such that all oil and grease is contained and collected for off site recycle or disposal.

SPILL PREVENTION AND RESPONSE

- a. Spills of fluids will be immediately contained, absorbed and containerized to prevent them from affecting storm water.
- b. Spill response materials will be kept on site near areas having spill or leak potential in order to contain or absorb drips or spills of fluids and solids or to dam storm water runoff pathways (e.g., shovels).
- c. Adequate secondary containment will be provided for those petroleum storage containers per the SPCC Plan.
- d. Employees will be trained in spill prevention and response, notification procedures, and the use of onsite equipment for this purpose.

SEDIMENT AND EROSION CONTROL

- a. Native vegetation will be maintained and undisturbed in the unpaved, non-traffic areas of the site, including drainage pathways.
- b. Drainage pathways will be inspected quarterly for erosion; significant erosion will be addressed by filling in the eroded areas with onsite soil or other material, while maintaining the natural drainage pathway.

5.0 PLAN UPDATES, AND ANNUAL FACILITY SITE COMPLIANCE INSPECTION

5.1 STORM WATER POLLUTION PREVENTION PLAN UPDATES

This SWP3 will be updated or modified as often as is necessary. Revisions will be made based on all applicable changes resulting from the comprehensive site compliance report and will include changes to the site map, inventory of exposed materials, good housekeeping measures, BMPs or control measures, and any other element of the SWP3 that requires modification. The update will be made within twelve (12) weeks of the comprehensive site compliance evaluation report.

5.2 ANNUAL FACILITY SITE COMPLIANCE INSPECTION

WPF will conduct annual comprehensive evaluations by December 31 of each calendar year and record the results of the inspections on MDEQ's Annual Comprehensive SWPPP Evaluation Form. A copy of the form will be kept with the SWP3. Appendix E presents this form.

6.0 SWP3 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 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.

B. Thea	(Signature)	3-10-2023 (Date)
The Comment of the Co	(Signature)	(Date)
Brian Thrasher	_ (Name - printed)	
Plant Manager	(Title)	
	_ (/	
Westlake Pipe & Fittings	(Company Name)	

	onmental Consultants, Inc.	onivn∃ & l
INSECTION FORMS	I TH I NOW	
DEPLOY FORMS		

INDUSTRIAL STORMWATER GENERAL PERMIT COVERAGE NUMBER (MSR_____) MONTHLY INSPECTION / VISUAL EVALUATION REPORT (FOR INDUSTRIAL STORM WATER ACTIVITY)



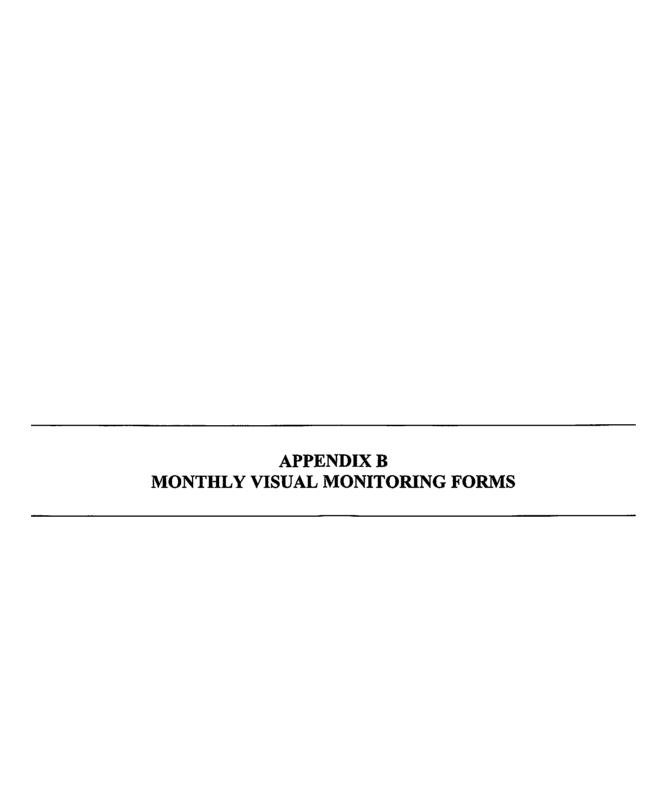
As required by ACT10 of this permit, this inspection / visual evaluation form must be completed on a monthly basis. Completion of this form must be performed by an individual with the knowledge, skills, and training to assess conditions and activities that could impact storm water quality and to evaluate the effectives of best management practices required by this permit. A copy of the completed and signed form shall be maintained on-site with the SWPPP and be available for review by MDEO personnel upon request.

FACILITY NAME:					DATE:
PHYSICAL ADDRESS:					
 WEATHER INFORMATION: Description of Weather Conditions (e.g., sunny, cloudy, raining) 	ng, sn	owing	, etc.)	0	
Was the inspection conducted during or immediately after a rastorm water outfall and attach the results to this form.	ain ev	ent? [□ Ye	es No If ye	s, conduct a Jar Test at each
I. POTENTIAL POLLUTANT SOURCE, AREA INSPECTION	ANI	BES	T MA	ANAGEMENT P	RACTICES EVALUATION
SWPPP AND SITE MAP:	Yes	No	N/A	Findings & Rem	edial Action Documentation
 Is the Site Map current and accurate? Is the SWPPP inventory of industrial activities, materials and products current? 	0 0	0 0	0 0		
VEHICLE/EQUIPMENT AREAS: Equipment cleaning:		0	0		
 Is equipment washed and / or cleaned using a detergent(s)? If so, is all wash water captured and properly disposed of? 	00	Ŏ	0		
Equipment fueling:					
 Are all fueling areas free of contaminant buildup and evidence of chronic leaks/spills? 	0	0	0		
 Are all chemical liquids, fluids, and petroleum products, stored on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater? 	0	0	0		
Are structures in place to prevent precipitation from accumulating in containment areas?	0	0	0		
If not, is there any water or other fluids accumulated within the containment area?	0	0	0		

	Yes	No	N/A	Findings & Remedial Action Documentation
Equipment maintenance:				
 Are maintenance tools, equipment and materials stored under shelter, elevated and covered? 	0	0	0	
 Are all drums and containers of fluids stored with proper cover and containment? 	0	0	0	
• Are exteriors of containers kept outside free of deposits?	0	0	0	
 Are any vehicles and/or equipment leaking fluids? Identify leaking equipment. 	0	0	0	
 Is there evidence of leaks or spills since last inspection? Identify and address. 	0	0	0	
 Are materials, equipment, and activities located so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas)? 	0	0	0	
Add any additional site-specific BMPs:	0	0	0	
GOOD HOUSEKEEPING BMPS:				
1. Are paved surfaces free of accumulated dust/sediment and debris?	0	0	0	
Date of last vacuum/sweep				
 Are there areas of erosion or sediment/dust sources that discharge to storm drains? 	0	0	0	
2. Are there any waste receptacles located outdoors? If yes:	Ö	0	0	
In good condition?	0	0	0	
Not leaking contaminants?	0	0	0	
Closed when not being accessed?	0			
 External surfaces and area free of excessive contaminant buildup? 	0		0	
3. Are the following areas free of accumulated dust/sediment, debris, contaminants, and/or spills/leaks of fluids?				
External dock areas	Ŏ	Ŏ	Ŏ	
Pallet, bin, and drum storage areas	0	0	0	
Maintenance shop(s)	0	0	0	
 Equipment staging areas (loaders, tractors, trailers, forklifts, etc) 	0	0	0	
 Around bag-house(s) 	0			
Around bone yards	0		0	
Other areas of industrial activity:	0	$ \circ $		
				

SPILL RESPONSE AND EQUIPMENT:	Yes	No	N/A	Findings & Remedial Action Documentation
1. Are spill kits available, in the following locations?				
Fueling stations	0	0	0	
Transfer and mobile fueling units	0	0	0	
Vehicle and equipment maintenance areas	0	0	0	
Process / product formulation areas	0	0		
•				
2. Do the spill kits contain all the appropriate necessary items such				
as:				
• Oil absorbents?	0	0	0	
 A storm drain plug or cover kit? 	0	\circ	0	
 A non-water containment boom? 	0	O	0	
• A non-metallic shovel?	0	O	0	
Other additional items:	0	0	0	
		0	0	
3. Are contaminated absorbent materials properly disposed?	\vdash	\vdash		
GENERAL MATERIAL STORAGE AREAS:				
Are damaged materials stored inside a building or another the of storm resistant shallow?	0		0	
type of storm-resistant shelter?		lo	0	
 Are all uncontained material piles stored in a manner that minimizes the discharge of impacted storm water? 				
Are scrap metal bins covered?	0	0	0	
Are outdoor containers covered?	0	0	0	
			ļ	
STORM WATER BMPs AND TREATMENT STRUCTURES:				
(Visually inspect all storm water BMPs, treatment structures / devices, discharge areas, infiltration, and outfalls shown on the Site Map).				
Are BMPs and treatment structures in good repair and	0			
operational?				
Are BMPs and treatment structures free from debris buildup	0	0	0	
that may impair function?				
Are berms, curbing or other methods used to divert and direct	0	0	0	
discharges adequate and in good condition?				
OBSERVATION OF STORM WATER DISCHARGES:	_	_		
• Is the discharge free of floating materials, visible oil sheen,	0	0	0	
discoloration, turbidity, odor, foam or any other signs of contamination?				
	0		0	
 Water from washing vehicles or equipment (with detergent), steam cleaning and/or pressure washing is considered process 		~	~	
wastewater and is not allowed to comingle with storm water				
or enter storm drains. Is process water comingling with storm				
water or entering storm drains?	0	lo	0	
 Illicit discharges include domestic wastewater, noncontact cooling water, or process wastewater (including leachate). 				
Were any illicit discharges observed during the inspection?				
		1	L	I

MISCELLANEOUS AREAS / ITEMS OF	Concern:	Yes	No	N/A	Findings & Remedial Action Docum	entation
(Evaluations of any matters that are not contained within another						
section but are covered in the SWPPP						
housekeeping measures; unique BMPs	; observations, etc.] should					
be denoted here.)						
_						
						
	-					
						
		i				
		Į.				
	 			1		
II. CORRECTIVE ACTION AND S	WPPP MODIFICATION D	ESCR	IPTI	ONS:	Additional space to describe inspe	ction findings
and corrective actions if needed. Pro-	vide brief explanation of the	gene	ral lo	cation	and the rationale for the additions	d or different
BMPs.	· 					
			•			
						
III CEDTIFICATION STATEMEN	TS AND SIGNATUDES.					
III. CERTIFICATION STATEMEN						
Inspector - Certification: This section	n must be completed by the p					tting this form
	n must be completed by the p					tting this form
Inspector - Certification: This section	n must be completed by the p					tting this form
Inspector - Certification: This section to the person with signature authority	n must be completed by the p or a duly authorized represent	ative	of tha	t perso	on.	tting this form
Inspector - Certification: This section	n must be completed by the p or a duly authorized represent	ative	of tha	t perso	on.	tting this form
Inspector - Certification: This section to the person with signature authority	n must be completed by the p or a duly authorized represent	ative	of tha	t perso	on.	tting this form
Inspector - Certification: This section to the person with signature authority	n must be completed by the p or a duly authorized represent	ative	of tha	t perso	on.	tting this form
Inspector - Certification: This section to the person with signature authority	n must be completed by the p or a duly authorized represent	ative of my	of tha	t perso	on.	tting this form

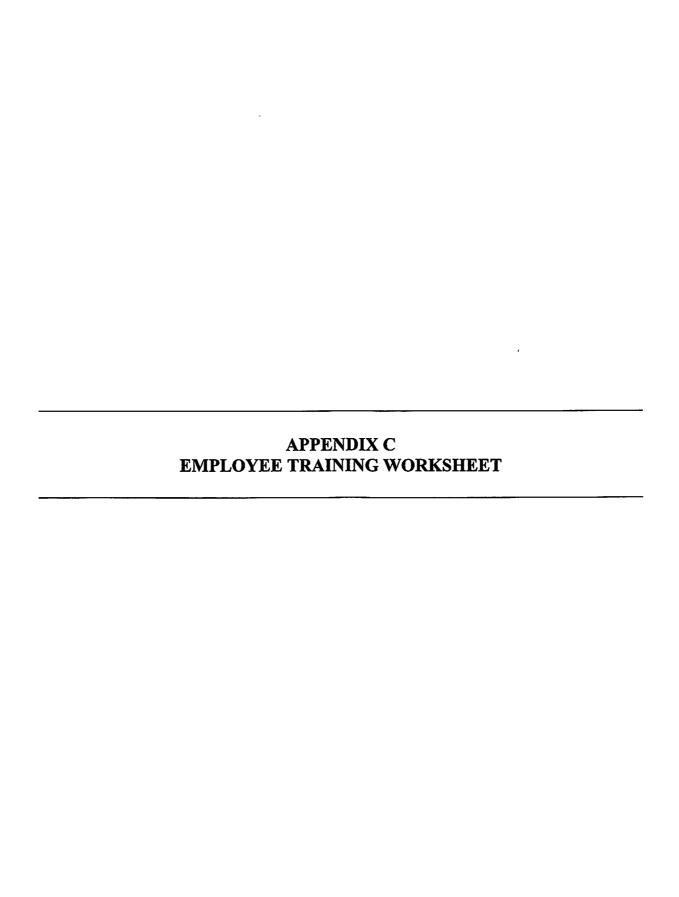


Monthly Visual Jar Test Inspection Form



Instructions: As part of inspections conducted during or after storm events, a representative sample of storm water should be collected at each outfall in a clean, clear jar and examined in a well-lit area. Should any of the objectionable characteristics described in the form below be observed, coverage recipient shall investigate upstream from the sample location to identify the potential sources of pollution, implement corrective action, and describe the corrective action in the space provided below. [Industrial Stormwater General Permit ACT10 R-1]

Facility Name:		Physical Address:					
Date:		Coverage Number:					
Time collected:	Person co	ollecting/examining san	nple (Print):				
Outfall Number/Location sample	le was col	lected:					
Was the sample collected during	g or imme	diately after a rain ever	nt? Yes or No				
Parameter	Pa	rameter Description	Description of Sample				
Color		Is the water sample colored? Yes or No	If yes, describe the color:				
Clarity		he water sample clear and transparent? Yes or No	If no, describe the clarity:				
Floating Solids		e there solids floating the top of the sample? Yes or No	If yes, describe the floating solids:				
Settled Solids		re there solids settled t in the bottom of the sample? Yes or No	If yes, describe the settled solids:				
Suspended Solids		Are there solids spended in the water slumn of the sample? Yes or No	If yes, describe the suspended solids:	700			
Foam		there foam forming at the top of the sample? Yes or No	If yes, describe the foam:				
Odor	Do	es the sample have an odor? Yes or No	If yes, describe the odor:				
Oil Sheens		es the sample have an il sheen? Yes or No	If yes, describe the oil sheen:				
Detail any concerns noted in the	e visual ja	r sample and describe t	the corrective actions taken:				
"I certify under penalty of law that the	his report is	s true, accurate, and compl	lete, to the best of my knowledge and belief."				
Inspector's Name - Printed		Inspector's Signa	ature Date				

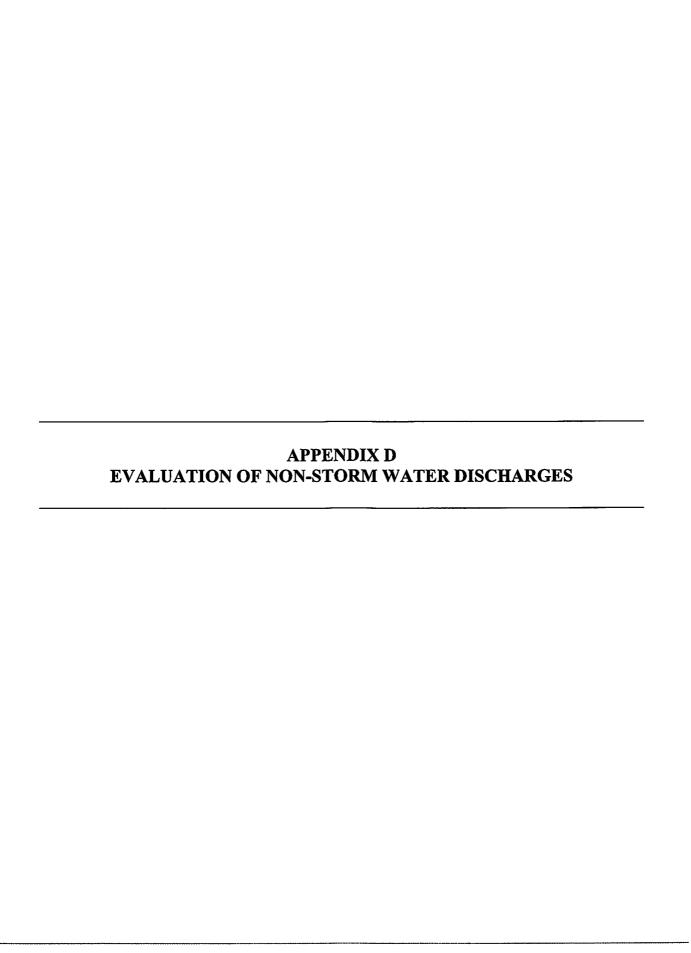


Employee Training Log



Instructions: Newly hired employees responsible for implementing and/or complying with the requirements of the permit shall receive initial training prior to performing such responsibilities. Employees shall receive refresher training at a minimum of every twelve (12) months, thereafter. Proper documentation of employee training must be maintained. Include copies of the training agenda and certificates of training when applicable. All training records shall be maintained for at least three years from the date of training. [Industrial Stormwater General Permit ACT14 S-1]

Facility Name:	Phy	sical Address:	
Coverage Number:	Trai	ning Date:	
Training Topic:			
Training Description:			
Employee Name (printed)	Employee Signat	ure Worker ID Number	Initial/Refresher
			1. 1. 6.11
"I certify under penalty of law that this rep	ort is true, accurate, and com	plete, to the best of my knowledge and t	bettef."
Trainer Name (printed)		Trainer Signature	Date



EVALUATION OF NON-STORM WATER DISCHARGES

	DATE OF EVALUATION	DESCRIPTION OF NON-S' DISCHARGE OBS		USED TO EL	EN/CONTROL MEASURES JMINATE NON-STORM ER DISCHARGE		WHERE NON-STORM SCHARGE OCCURRED	1
								1
								1
			<u> </u>				-	
qu: res	alified personnel properlations for gathering to the specific property of the second proper	aw that this document and all y gather and evaluate the info he information, the informatio se information, including the	mation submitted on is, to the best	d. Based on my inquot of my knowledge a	uiry of the person or person and belief, true, accurate, a	s who manage the s	system or those persons direc	tly
_	Name and Title (please print)	Telepho	one Number				
_	Signature		Date Si	gned				

APPENDIX E ANNUAL COMPREHENSIVE SITE INSPECTION AND SWP3 EVALUATION REPORT

INDUSTRIAL STORM WATER GENERAL PERMIT COVERAGE NUMBER (MSR_____) ANNUAL COMPREHENSIVE SWPPP EVALUATION FORM



Coverage recipients shall conduct a comprehensive evaluation of the facility's SWPPP by December 31, 2021, and annually thereafter by December 31st of each year. The evaluation shall assess the effectiveness and accuracy of the SWPPP and ensure that the SWPPP is current, up to date, and meets all the requirements of ACT5 T-1 through T-9. Should the SWPPP need to be amended based on the findings of any evaluation, a copy of the amended SWPPP must be submitted to MDEQ in accordance with ACT9 S-1 (4).

FACILITY NAME:			EVA	EVALUATION DATE:			
PHYSIC	CAL ADDRESS:						
I. DESCRIPTION OF POTENTIAL POLLUTANT SOURCES							
INDUSTRIAL ACTIVITIES			No	Findings & Remedial Action Documentation			
• D	Does the SWPPP have a list of Industrial Activities exposed to storm water?	0	0				
e	Has the facility added any Industrial Activities that are exposed to storm water since the previous Annual SWPPP Evaluation?	0	0				
MATERI	IALS AND POLLUTANTS						
	Does the SWPPP have a list of materials and pollutants exposed to storm water?	0	0				
	Does the SWPPP have a narrative description of the naterials and pollultants?	0	0				
	f so, does the narrative contain the following nformation?						
0	Method of storage and disposal.	0	0				
0	Management practices employed to minimize contact with storm water.	0	0				
0	Structural and non-structural control measures to reduce pollutants in storm runoff.	0	0				
0	4	0	0				
SPILLS A	AND LEAKS						
	Does the SWPPP contain a monthly updated list of spills and leaks?	0	0				
• E	Does the SWPPP contain an updated summary of all storm water samplaing data including a description of associated pollutants?	0	0				

I. DESCRIPTION OF POTENTIAL POLLUTANT SO	OURCES (CO	NTINUED)	
SITE MAP	Yes	No	Findings & Remedial Action Documentation
 Does the SWPPP have a site map showing the pro- layout with site boundaries? 	perty O	0	
If so, does the site map indicate the following feature.	ures?		
o Surface water bodies.	0	0	
o Drainage area of each storm outfall by numbe	er. O		
o Direction of flow for each drainage area.	0	0	
 Location and description of existing structural non-structural control measures to reduce the pollutants in storm runoff. 	l and	0	
 Location of any storm water treatment activities 	ies. O	0	
o Location of any storm drain inlets.	0	0	
o Location of industrial activities, such as:	0		
 a) Fuel storage and dispensing loca b) Vehicle/equipment repair, maint and cleaning areas. c) Materials storage and handling at Loading/unloading areas. e) Process or manufacturing areas. 	tenance, areas.		
 Location of housekeeping practices. 			
o Storm water conveyances (ditches, pipes, & s	wales).	0	
II. DESCRIPTION OF STORM WATER MANAGEM	IENT CONTI	ROLS	
POLLUTION PREVENTION MANAGER/COMMITTEE			
 Does the SWPPP specify individual(s) responsible developing the SWPPP and assisting the facility m in its implementation, maintenance, and revision? 	nanager	0	
 If so, have there been any changes in the personne since the previous Annual SWPPP Evaluation? 	el listed O	0	
RISK IDENTIFICATION AND MATERIAL INVENTORY		1	
Does the SWPPP assess the pollution potential of sources at the facility including loading and unload operations; outdoor storage, manufacturing or productivities; significant dust or particulate generating processes and on-site disposal practices?	ding cessing	0	
• If so, have there been any changes in operations of sources of potential pollutants since the previous A SWPPP Evaluation.?	Or Annual	0	

II. DESCRIPTION OF STORM WATER MANAGEMENT CONTROLS (CONTINUED)					
SEDIMENT AND EROSION PREVENTION	Yes	No	Findings & Remedial Action Documentation		
 Does the SWPPP identify areas with a high potential for soil erosion, and specify prevention measures to limit erosion? 	0	0			
 If so, have there been any changes to the facility which would increase the potential for soil erosion since the previous Annual SWPPP Evaluation? 	0	0			
PREVENTIVE MAINTENANCE					
 Does the SWPPP contain a preventive maintenance program to insure the inspection and maintenance of storm water management devices? 	0	0			
 If so, does the program specify protocol for inspecting and testing of equipment to preclude breakdowns or failures that may cause pollution? 	0	0			
Does the SWPPP describe and list practices appropriate to prevent pollutants from entering storm water from industrial activities due to poor housekeeping?	0	0			
If so, do the practices describe or list the following:					
 Designated areas for equipment maintenance and repair. 	0	0			
 Provisions for waste receptacles at convenient locations. 	0	0			
 Provisions for regular collection of waste. 	0	0			
 Adequately maintained sanitary facilities. 	0	0			
o Secondary containment around any on-site fuel or chemical container with a capacity greater than 660 gallons or any combination of containers which have an aboveground storage capacity of more than 1,320 gallons.	0	0	·		
Secondary containment for raw material stockpiles.	0	0			
SPILL PREVENTION AND RESPONSE PROCEDURES	_				
 Does the SWPPP identify potential spill areas and their drainage points? 	0	0			
 Does the SWPPP specify material handling procedures and storage requirements? 	0	0			
Does the SWPPP have procedures for cleaning up spills?	0	0			
 Have there been any changes at the facility in potential spill areas and/or their drainage points since the previous Annual SWPPP Evaluation? 	0	0			
EMPLOYEE TRAINING					
Does the SWPPP specify periodic training for personnel that are responsible for implementing and/or complying with the requirements of the SWPPP? (see ACT14)	0	0			

II. DESCRIPTION OF STORM WATER MANAGEMENT C	ONTRO)LS (CC	ONTINUED)
ILLICIT CONNECTIONS EVALUATION AND CERTIFICATION	Yes	No	Findings & Remedial Action Documentation
Does the SWPPP contain an illicit connection certification?	0	0	
 If so, was the certification evaluation and certification completed within the last 5 years? 	0	0	
 Does the certification include the following?: Method of evaluation, date(s), observation point(s), and result(s). 	0	0	
Does the SWPPP describe the policy and procedures for routine visual inspections, including frequencies and areas to be inspected?	0	0	
 Does the SWPPP inspection policy describe procedures for collecting storm water if the inspection is conducted during or after a storm event? 	0	0	
 If so, does the SWPPP inspection policy outline procedures consistent with the requirements of ACT10 R- 1 to investigate, correct, and document instances in which visible pollutants are observed? 	0	0	
STORM WATER MANAGEMENT			
 Does the SWPPP provide for the management of storm water volume through its diversion, infiltration, storage or re-use? 	0	0	
III. NON-STORM WATER DISCHARGE MANAGEMENT	· · · · · · · · · · · · · · · · · · ·		
NON-STORM WATER MANAGEMENT			
 Does the SWPPP identify any allowable non-storm water discharges identified in ACT2 T-3? 	0	0	
 Does the SWPPP identify and ensure the implementation of appropriate Best Management Practices (BMPs) for the non-storm water component of any discharge? 		0	
 Have there been any changes or additions to the allowable non-storm water discharges since the previous Annual SWPPP Evaluation? 	0	0	
IV. FACILITY CHANGES			
Mas there been a change in design, construction, operation, or maintenance, which may increase the discharge of pollutants to waters of the State or has the SWPPP been ineffective in controlling storm water pollutants? If so, amend the SWPPP and submit it to the MDEQ within 30 days of amendment. (ACT9 S-1 (4))	0	0	
	ŀ	l	

DATE TIME	ANY	Property Deficiencies?		IF YES, WERE CORRECTIVE		
(mm/dd/yy)		YES	NO	YES	FIONS TAKEN?	
	-					
				-		-
				-		
						
'I certify that this	s report is true, a		mplete to the best of m		Title	Date
					line	Date
O/DAR CERTIF	ICATION AND	SIGNATURE	<u> </u>	· · · · · · · · · · · · · · · · · · ·		
The SWPPP i SWPPP will b	s out of compliant to a mended and so the amended and so the a system designed the person	nce with the tern ubmitted to ME at this documen d to assure that or persons who	ns and conditions of the DEQ within 30 days of the and all attachments we qualified personnel proposest of my knowledge and the system, of my knowledge and the system.	e Baseline Industramendment. ere prepared under perly gathered are those persons did belief, true, according to the control of the control o	Storm Water General Perial Storm Water General er my direction or superal nd evaluated the inform rectly responsible for generate, and complete. It	al Permit. The rvision in ation submitted. athering am aware that the
Based on my inquinformation, the i			mation, including the r	OSSIDILITY OF TIME O		
Based on my inquinformation, the i		tting false infor	mation, including the p	<u> </u>		lowing violations.
Based on my inquinformation, the i	production for subministration for the subministration	tting false infor	mation, including the p gnature of person with uthorized Representat	n Signature Auth	ority or a Duly	Date





State of Mississippi Mississippi Department of Environmental Quality (MDEQ)



INDUSTRIAL STORM WATER GENERAL PERMIT FOR INDUSTRIAL ACTIVITES

THIS CERTIFIES THAT

FACILITIES OR PROJECTS ISSUED A CERTIFICATE OF PERMIT COVERAGE UNDER THIS PERMIT ARE GRANTED PERMISSION TO DISCHARGE STORM WATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES INTO STATE WATERS IN ACCORDANCE WITH THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES);

in accordance with effluent limitations, inspection requirements and other conditions set forth in herein. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

Mississippi Environmental Quality Permit Board

Authorized Signature

Mississippi Department of Environmental Quality

Issued: December 10, 2020

Permit No. MSR00

Expires: November 30, 2025