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07/18/2024

INDUSTRIAL STORMWATER NOTICE OF INTENT (ISNOI)

FOR COVERAGE UNDER THE INDUSTRIAL STORMWATER GENERAL NPDES PERMIT MSR00 25 45
(NUMBER TO BE ASSIGNED BY STATE)

INSTRUCTIONS

Applicant must be the owner or operator (i.e., legal entity that controls the facility's operation, or the plant/site manager, not the environmental consultant). The owner or operator that receives coverage is responsible for permit compliance. File at least 60 days prior to the commencement of the regulated industrial activity.

Submittals with this ISNOI must include a Storm Water Pollution Prevention Plan (SWPPP) with the minimum components found in ACTs 5-8 of the Industrial Stormwater General Permit. In addition, a United States Geological Survey (USGS) quadrangle map (or a copy) showing site location and extending at least 1/2 mile beyond the site's property boundary is required. If a copy is submitted, provide the name of the quadrangle map that is found in the upper right hand corner. Maps can be obtained from the MDEQ, Office of Geology at 601-961-5523.

ALL FORM BLANKS MUST BE COMPLETED (enter "NA" if not applicable)

THE APPLICANT IS: OWNER OPERATOR (PLEASE CHECK ONE OR BOTH)

OWNER INFORMATION

Owner Contact Name: Charles K. Brown, RPG Position: Environmental Officer
Owner Company Name: Illinois Central Railroad - Brookhaven Yard
Owner Street (P.O. Box): 2151 North Mill Street
Owner City: Jackson State: MS Zip: 39202
Owner Phone Number: (601) 592-1838 Owner Email: charles.brown2@cn.ca

OPERATOR INFORMATION (if different than owner)

Operator Contact Name: Charles K. Brown, RPG Position: Environmental Officer
Operator Company Name: Illinois Central Railroad - Brookhaven Yard
Operator Street (P.O. Box): 805 WL Behan Road
Operator City: Brookhaven State: MS Zip: 39601
Operator Phone Number: 601 592-1838 Operator Email: charles.brown2@cn.ca

FACILITY INFORMATION

Facility Name: Illinois Central Railroad - Brookhaven Yard

Nature of Business (Include 4-digit Standard Industrial Classification Code (SIC) and description):

SIC Code: 4011 Railroads, Line-Hauling Operating

Receiving Stream: No Nearby Receiving Waters

Is receiving stream on MDEQ's 303(d) List?

Yes No

Has a TMDL been established for the receiving stream segment?

Yes No

Physical Site Address:

Street: 805 WL Behan Road City: Brookhaven

County: Lincoln Zip: 39601

Latitude: 31 degrees 35 minutes 22.29 seconds Longitude: -90 degrees 26 minutes 2.97 seconds

Method Used to Determine Lat & Long (GPS of plant entrance) or Map Interpolation): GPS of center of yard

Attach a copy of any existing laboratory data for each storm water outfall. If multiple sampling has been performed, provide a summary for each parameter, including sampling dates and the minimum, average and maximum values.

Is this a SARA Title III, Section 313 facility utilizing water priority chemicals at threshold amounts? Yes No
If yes, please attach a list of water priority chemicals present at the facility.

DOCUMENTATION OF COMPLIANCE WITH OTHER REGULATIONS/REQUIREMENTS

Is this notice for a facility that will require other permits? Yes No

If yes, check which one(s): Air, Hazardous Waste, Pretreatment, Water State Operating, Individual NPDES, or list Other(s):

N/A

How will sanitary sewage be collected and treated? Public Sanitary Sewer

Indicate any local storm water ordinance with which the facility must comply and submit any documentation of approval.

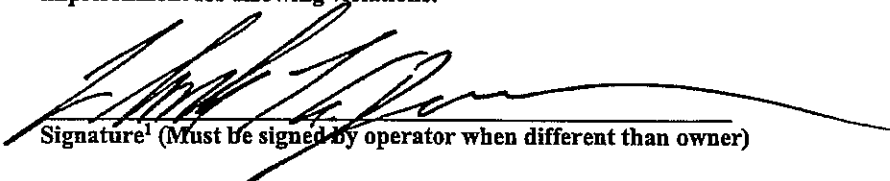
N/A

Is treatment of storm water provided at any outfall? Yes No

If yes, please describe: N/A

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.


Signature¹ (Must be signed by operator when different than owner)

SEP. 9 2024
Date Signed

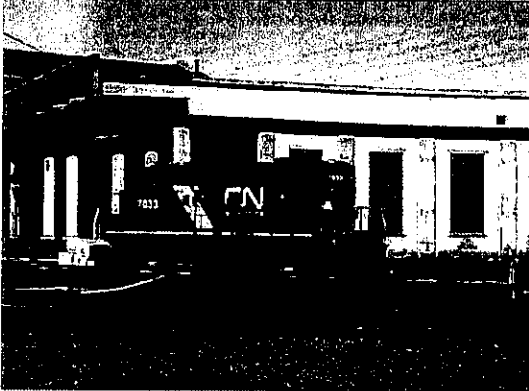
Charles K. Brown, RPG
Printed Name¹

Environmental Officer
Title

¹This application shall be signed according to the General Permit, ACT 16, T-9, as follows:

- For a corporation, by a responsible corporate officer.
- For a partnership, by a general partner.
- For a sole proprietorship, by the proprietor.
- For a municipal, state or other public facility, by principal executive officer, the mayor, or ranking elected official.

After signing please mail to: Chief, Environmental Permits Division
MS Department of Environmental Quality, Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225



**Brookhaven Yard
Storm Water Pollution
Prevention Plan (SWPPP)**

For Spill Events, Call

**CN Police
(800) 465-9239**

Prepared For:

Illinois Central Railroad Company

**805 W.L. Behan Road
Brookhaven, Mississippi 39601**

Prepared By:

**TRC Environmental
114 Edinburgh S. Drive, Suite 200
Cary, NC 27511**

September 2024

CERTIFICATION STATEMENT FOR BROOKHAVEN YARD

I certify under penalty of law that this document and 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.

Corporate Officer Name: Charles K. Brown, RPG

Title: Environmental Officer

Signature: _____

Date: _____

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1 SWPPP OBJECTIVES AND ORGANIZATION

At the Illinois Central (IC) Railroad Company Brookhaven Yard (Facility) storm water management is approached as a team effort. This section summarizes the Storm Water Pollution Prevention Plan (SWPPP) objectives, organization, and team members.

1.1 Facility Background and Description

This SWPPP has been completed for the Brookhaven Yard owned by IC and located at 805 W.L. Behan Road, Brookhaven, Lincoln County, Mississippi. The Facility location is shown on **Figure 1**. The Facility is operated as a railroad Maintenance-of-Way (MOW) facility, housing both track engineering/maintenance needs, and signals and communications, as needed, under IC's transportation facility (SIC 4011) where minor equipment maintenance and direct-to-locomotive (DTL) fueling is conducted.

The Facility consists of approximately 11 acres of land. Brookhaven Yard is situated in an area that is relatively flat, with a gentle slope to the southeast with runoff occurring by sheet flow. Distinct stormwater outfalls are not located at the Facility. Two small buildings and two small, covered storage areas are located on the property. Asphalt and concrete pavement are not utilized at the property, making most of the drainage area at the Facility pervious to storm water. The existing structures and flow direction for Brookhaven Yard are shown on **Figure 2**.

1.2 SWPPP Objectives

The objective of this SWPPP is to manage significant materials that may pollute storm water so the concentrations of such materials in storm water discharges from the Facility will not cause degradation of surface waters that result in violations of the State's water quality standards. To accomplish this, the SWPPP has the following objectives:

- Identify person(s) who will have supervision over the inspection and management of storm water controls.
- Identify the source(s) of significant material(s) that could mix with storm water and be discharged from the Facility.
- Identify control measures (i.e., Best Management Practices, or BMPs) to be used at the source to prevent significant material(s) from entering storm water.
- Identify schedules for SWPPP evaluations and updates.
- Identify practices to ensure that only storm water is discharged from the Facility or that non-storm water discharges are covered by a National Pollutant Discharge Elimination System (NPDES) permit for such discharges.

The SWPPP, associated reports, and supporting documents will be kept in electronic format accessible by qualified individuals at the Facility, as well as on-site in the Engineering Building, and will be made available upon request to authorized representatives of the United States Environmental Protection Agency (EPA), the State, and IC. The SWPPP shall be submitted to the Mississippi Department of Environmental Quality, Office of Pollution Control (MDEQ OPC) in accordance with the applicable permit requirements.

1.3 SWPPP Organization

The SWPPP is organized in sections that follow the flow chart shown in **Exhibit 1.1**. This flow chart indicates each step involved in the development of the SWPPP. It also shows the interaction between different sections of the SWPPP. Evaluation and routine inspection procedures are utilized to assess the activities performed on-site and to re-evaluate the success of BMPs originally selected for implementation in the SWPPP. This evaluation/revision process is essential to keeping the SWPPP up-to-date and effective.

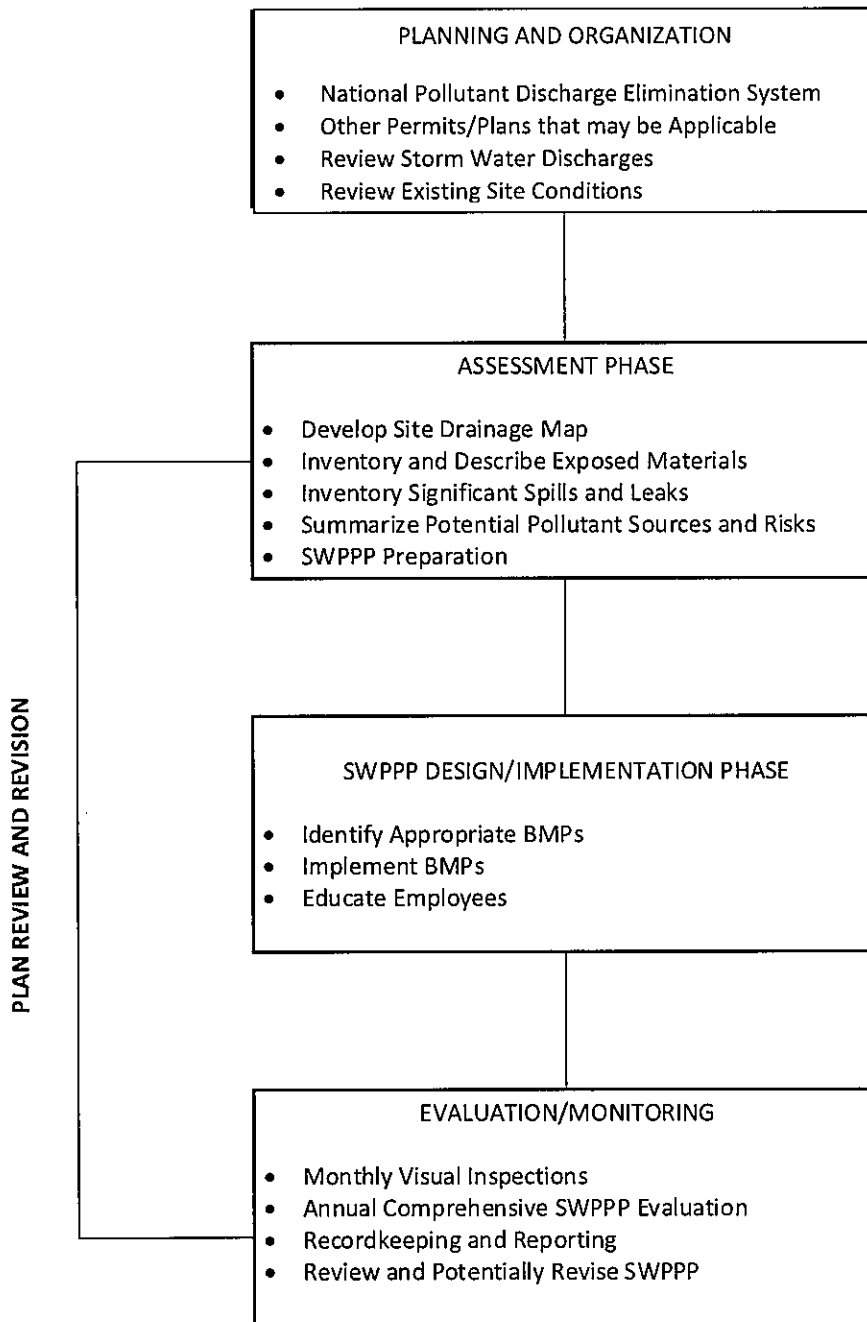
1.4 Pollution Prevention Team

The Storm Water Pollution Prevention Team (Team) consists of individuals who develop, implement, and maintain the SWPPP. **Exhibit 1.2** identifies the members of the Brookhaven Yard Team and their responsibilities.

The Team has reviewed the SWPPP, discussed SWPPP implementation results, and decided how the SWPPP can be incorporated into everyday operations.

The designated Team member(s) are required to perform the facility monitoring described in Section 6.0 of this SWPPP. Reporting requirements are described in Section 7.0.

Exhibit 1.1 – Storm Water Pollution Prevention Plan Flow Chart



Modified from EPA "Stormwater Management for Industrial Activities Developing Pollution Prevention Plans and Best Management Plans" dated September 1992.

Exhibit 1.2 – Storm Water Pollution Prevention Team Member Roster

Name	Role	Responsibilities
Charles Brown	Environmental Officer	<ul style="list-style-type: none"> • Oversee and coordinate the development, evaluation, and implementation of the SWPPP. • Supervise required monthly and annual documentation. • Arrange required monthly inspection and conduct annual review assessments. • Serve as Facility point-of-contact to MDEQ. • Ensure appropriate reporting and MDEQ requests for additional information are submitted. • Act as Emergency Team Leader for spill response.
Chad Cockrell	Environmental Technician	<ul style="list-style-type: none"> • Conduct site inspections and coordinate preventative and BMP maintenance activities. • Implement repair and maintenance of BMPs, as necessary.
MOW Staff	Varies	<ul style="list-style-type: none"> • Adhere to BMPs identified herein. • Manage significant material uses and transfers while minimizing exposure to storm water.

2 FACILITY ACTIVITIES AND DRAINAGE

Identification of Facility drainage basins, storm water drainage routes, and possible pollutant sources is essential for complete SWPPP preparation. This section summarizes the Facility observations.

2.1 Facility Activities

A summary of activities (as located on **Figure 2**) ongoing at this Facility is provided in **Exhibit 2.1**.

2.2 Existing Permits

Brookhaven Yard seeks to be issued an Industrial Storm Water General Permit, which covers existing storm water discharges associated with industrial activities. This SWPPP covers the general permit period beginning on December 10, 2020 and expiring on November 30, 2025 (**will update once permit is received**). Copies of the existing permit are provided in **Appendix A**.

2.3 Drainage Areas

The Facility is located in an area with little topographic relief. Storm water drainage patterns are influenced by surface characteristics which include natural areas, gravel topping, rail tracks, and drainage ditches; no large impervious surfaces (i.e., paving) are present at the Facility nor immediately adjacent. There are no receiving waters in the vicinity of the Facility.

2.4 Non-Storm Water Discharges

The Environmental Technician at the Facility will conduct observations and/or tests needed to determine if non-storm water discharges are present at the Facility at least once every five years. The Environmental Technician will keep records of observation and/or tests on the site and will report unusual characteristics of discharge to the IC Environmental Officer and local authorities, as appropriate. A non-storm water discharge inspection form can be found in **Appendix D**.

Allowable non-storm water discharges identified in the permit include:

- Discharges from fire-fighting activities;
- Fire hydrant flushing;
- Water used to control dust;
- Potable water including uncontaminated water line flushing;
- Routine external building wash down that does not use detergents;
- Pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless remediated) and where detergents are not used
- Uncontaminated air conditioning or compressor condensate;
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials such as solvents;

- Uncontaminated excavation dewatering;
- Landscape irrigation; and,
- Water used to wash vehicles where detergents are not used.

Exhibit 2.1 Summary of Facility Activities

Site/Activity	Description	Location	Drainage Area
Direct-to- Locomotive Fueling	A third-party fueling truck will arrive when locomotive(s) need refueling. The Locomotive will be placed over a track-mat for the duration of the fueling process. The delivery truck operator will make appropriate connections between the fuel truck and locomotive and will remain present "at-the-hose" throughout the fuel transfer. Once refueled, the third-party truck will depart the Facility.	On tracks in front of Engineering Building	Sheet flow occurs in the southeast direction
Locomotive Layover/Ready Tracks	Engines are decoupled and moved to a layover track, or left near the DTL location until needed for transporting customer cars.	On tracks in front of Engineering Building	Sheet flow occurs in the southeast direction
Railway Repair and Maintenance	Minor repair or maintenance is occasionally completed on locomotives and/or customer cars.	On tracks in front of Engineering Building	Sheet flow occurs in the southeast direction

3 SUMMARY OF SIGNIFICANT MATERIAL

3.1 Inventory of Exposed Stored Materials

The Facility is required to inventory the types of materials that are handled, stored or processed while on the property that can be exposed to storm water. Each material was assessed from a handling, storage and disposal standpoint to determine its exposure potential to storm water.

Significant materials that have the potential to be exposed to storm water are described in **Exhibit 3.1**. Included in this table are the method and location of on-site storage for each exposed material; material management practices used to minimize contact of materials with storm water; and location and description of existing structural and non-structural control measures to reduce pollutants in storm water runoff.

3.2 Inventory of Liquid Storage

Exhibit 3.2 presents a summary of liquid storage present at this Facility. The table designates the tank status (active vs. inactive), volume, tag number, type of secondary containment, evidence of spills and leaks, and the condition of the storage tank. No underground storage tanks (USTs) are known to be present at the Facility.

3.3 Inventory of Outdoor Maintenance and Operation Activities

Locomotive repair and/or large outdoor maintenance activities are not conducted at the Facility. Minor outdoor activities, typical of MOW activities, do occur outside, including the loading of supplies and equipment needed for track and signals repair and maintenance. Repair and maintenance of rail-specific equipment (locomotives and rail cars) are not performed at the Facility.

3.4 Inventory of Dust or Significant Particulate Generating Processes

Sand is present at the Brookhaven Facility. It is transferred to the locomotives for use in improving traction at other locations and can occasionally be "spit-out" during railroad operations.

3.5 Discharge from Rooftop Vents, Stacks and Air Emission Controls

There are no point or unit source air emissions observed that could impact storm water.

3.6 Locomotive Washing Stations

Locomotive washing does not occur at the Facility.

3.7 Facility Waste Disposal Practices

There are no materials disposed of at the Facility. Solid wastes, including special/universal wastes (fluorescent bulbs, ballasts, absorbents), and non-hazardous wastes (used oil, oil filters) are picked up and disposed of off-site by an approved transport and disposal subcontractor. Hazardous wastes are not typically generated at

the Brookhaven Yard; however, should a hazardous waste be generated, it will be managed in accordance with applicable storage and disposal regulations.

Solid waste is stored in covered dumpsters to minimize potential exposure during precipitation events.

3.8 Identification of Past Spills and Leaks

No significant spills or leaks have occurred at the Facility. The list of spills or leaks that affect storm water management will be updated monthly in **Appendix C** during the term of the storm water permit.

3.9 Risk Identification and Summary of Potential Pollutant Sources

Activities conducted at Brookhaven Yard that may potentially impact storm water include DTL fueling. Risks involved with these activities include:

- Overfill of locomotives could cause spills of diesel fuel.

Exhibit 3.1 Summary of Significant Materials

Significant Materials	Storage Locations	Activity Use Area	Potential for Exposure to Storm Water	Potential Pollutants	Drainage Area Discharge
Diesel Fuel	No diesel fuel is stored at the Facility.	Locomotive fueling occurs in front of the Engineering Building	Potential releases of diesel fuel would be associated with the hosing system from the truck to the locomotive or from idling locomotives.	Oil & Grease, Chemical Oxygen Demand (COD), Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS)	Sheet flow occurs in this area and runs towards the southeast.

Exhibit 3.2 Summary of Liquid Storage

Tank Volume (Gallons)	Tank Tag No.	Contents	Secondary Containment Type	Evidence of Spills/Leaks	Condition of Storage Tank
550	5874	Diesel Fuel	Double-walled tank	None	Good – no significant corrosion observed

4 BEST MANAGEMENT PRACTICES

After potential sources of significant storm water pollution are identified, implementation of BMPs aid in reducing storm water contamination. This section summarizes BMPs at Brookhaven Yard.

4.1 Introduction

BMPs eliminate or minimize contact of precipitation or runoff with materials that may have the potential to contaminate the storm water. There are two types of BMPs: non-structural BMPs and structural BMPs. Non-structural BMPs include a wide variety of operational activities or procedures that can improve the quality of storm water discharges without the construction of physical devices. Structural BMPs are physical devices that minimize contact of materials with storm water or that protect earthen materials from erosion/scour or that retain water for treatment prior to discharge. Structural BMPs are effective in decreasing storm water contamination and potential need for a treatment alternative; however, for certain operations and activities these methods may not be economically feasible or practical to install. Examples of general non-structural and structural BMPs that could be implemented at the Facility if/as needed, are included in **Exhibit 4.1**.

Exhibit 4.1 – Non-Structural and Structural BMPs

Non-structural BMPs	Structural BMPs
<ul style="list-style-type: none"> • Housekeeping and site maintenance operations; • Preventative maintenance; • Visual inspections; • Spill prevention and response; • Sediment and erosion control; and, • Management of runoff. 	<ul style="list-style-type: none"> • Berms and Dikes; • Silt fences; • Sedimentation Basins; • Vegetative and/or stabilization measures used to limit erosion (i.e. rip-rap and grassed swales); • Diversion; • Conveyances; • Grading and paving; • Storage in buildings/structures or under covering; and • Hazardous materials stored indoors in a containment area or outside within a hazardous materials storage building equipped with a roof and secondary containment system.

Section 2 and **Exhibit 2.1** summarize the areas and activities observed at the Facility that have the potential to produce storm water pollutants. The BMPs that would be applicable to reducing pollution are described in **Exhibit 4.2**.

Exhibit 4.2 – Pollutant Source Identification and BMPs

Potential Pollution Source	Existing BMPs	Proposed BMPs	Implementation Schedule
Petroleum product transfer	<ul style="list-style-type: none"> • Position transfer equipment appropriately to minimize impact to storm water. • Transfer personnel will not leave the transfer process unattended. • Respond to spills and leaks from transfer operation quickly. • Monitor hoses, fittings and valves for leaks. • Handle used fuel filters in general accordance with industry standards. • Monitor fuel delivery inventory records to assess potential unreported losses. • Require fuel transfer vendor to properly train truck drivers and to be responsible for their spills and leaks. 	None	Currently Implemented
Equipment fueling and maintenance	<ul style="list-style-type: none"> • Complete equipment repairs indoors or in covered areas. • Minimize spills and clean area after repairs. • Store fluids in manufacturers' or shipping containers or to those tanks/vessels specifically designed to contain the material. • Store batteries in proper containers or in covered/indoor area. 	None	Currently Implemented
Locomotive Sand Discharge	<ul style="list-style-type: none"> • Periodically cleanup sand that accumulates on the ground due to normal locomotive operations 	None	Currently Implemented

4.2 Good Housekeeping/Facility Maintenance BMPs

Good housekeeping practices are non-structural BMPs that maintain a clean, litter-free facility. The following practices will be in place at the Brookhaven Yard:

- Ground surface work areas are kept clean and free of debris/chemicals. Spills are promptly cleaned up; trash and other waste materials are placed in the appropriate containers; waste containers are covered when possible or placed in areas that are not exposed to rainfall or storm water.
- Work areas are routinely cleaned using hand brooms, shovels, sweeping machines or other appropriate devices.
- Large equipment that can't be easily covered or contained should be kept away from areas where storm water runoff collects or drains across.
- Surfaces of the property should be maintained to prevent pooling of storm water and allow drainage.
- Machines, tools, and other equipment that might spill or leak pollutants are kept in proper working order.
- In order to minimize potential spills or leaks from impacting storm water and/or migrating off-site, equipment and structures that designed to contain leakage and prevent contact with storm water must be maintained and in working condition.
- Containers of potential pollutants are stored in designated areas not exposed to storm water to the greatest extent possible.
- An up-to-date inventory is maintained of materials stored/used in the workplace and containers are labeled properly.
- Container lids are securely fitted to containers during storage and valves are in the closed position when not in use.
- Empty containers are properly closed, secured, and disposed of.
- Material handling practices include precautions to both prevent spills and to train personnel for proper handling and cleanup of these materials. If spills do occur, they are to be immediately identified, and appropriately cleaned up and reported, if necessary. These precautions include the inspection of hoses, piping, hand pumps, fittings, valves, and other equipment used to transfer these materials.

4.3 Preventative Maintenance

Preventative maintenance involves the regular inspection and testing of facility equipment and operational systems. These inspections are intended to uncover conditions such as cracks or slow leaks/drips, which could cause breakdowns or failures that result in discharges of chemicals to storm drains and surface waters. Containers, tanks, containment devices, or transfer equipment (hoses, pumps, connections) will be maintained in proper operating condition. The following procedures will be implemented at the Facility:

- Replace or repack dripping valves, pumps, faucets, or nozzles.
- Patch or replace leaking pipes, tanks, or bins, remove corrosion and repaint.
- Replace hoses that are leaking, damaged or cracked.
- Empty drip pans, aprons/buckets regularly.
- Avoid excess accumulations of grease, oil and other contaminants on equipment surfaces or any surfaces exposed to storm water.
- Repair, replace, and maintain containers that are stored outdoors and ensure secondary containment is present and free of liquid and debris.
- Employ record keeping system that defines a schedule for the necessary inspections and maintenance and documents the repairs and replacements when they occur.

4.4 Soil Erosion Control

While the Facility is situated in a relatively flat area with little to no topographic gradient, there are some localized areas where minor erosion may occur. At these potential areas, the Facility has implemented controls to minimize the effects of sedimentation and erosion. Structural (i.e., berms, ditches, silt fence, sedimentation basins), vegetative and/or stabilization measures have been or will be used, as appropriate, to limit erosion.

4.5 Spill Prevention and Clean-Up

Procedures are in place to limit spills during DTL fueling activities, however small spills or drips can occur while transferring petroleum products. These spills are generally small in volume and may accumulate on the ground over time. Specialized absorbents/pads (track pads) that are made to fit inside of the track gauge and just outside the gauge for approximately 20 inches on each side of the rail are utilized in the DTL fueling locations. These track pads absorb and retain minor drips/spills that may occur during the DTL fueling operations. The track pads are changed out, as needed, to minimize potential impacts to storm water. Should a more significant release occur, the Environmental Officer will be notified and appropriate response, up to and including hiring a third-party contractor to manage the spill recovery, will be initiated.

4.6 Site Security

The Facility is located in an area near other industrial activities. The Facility is manned during normal business operational hours, five days per week, and includes security lighting after dusk. Pole-mounted floodlights located near the perimeter and at select locations at the Facility provide Facility lighting. Facility lighting is sufficient to allow discovery of spills during dark hours and is also designed to discourage vandalism. Security is further enhanced by remote surveillance cameras.

The Facility has implemented the following security measures:

- Train workers for awareness of trespassers and notification procedures.
- Install safety barriers/posts to protect high risk areas.
- Make sure materials are properly labeled.
- Where fences are present, periodically check fences for holes or needed repairs.
- Establish notification procedures and phone numbers for emergency situations.
- Store hazardous materials in secure areas.

4.7 Management of Runoff

Management of runoff will consist primarily of structural controls to prevent storm water from contacting or being contacted by significant materials. Typical runoff controls include diversion, conveyances, grading and paving, coverings (e.g., structural roofs, tarps, roll-off boxes), track mats, and containment structures. In addition, an element of runoff control is spill and overflow protection to minimize the potential migration of chemicals or petroleum from their proper storage and/or use locations.

The significant industrial activities conducted at Brookhaven Yard include DTL fueling and MOW operations. Locomotive fueling is overseen by the third-party fueling truck operator. Scrap metal, paint, and railroad ties are kept in a covered storage area on the western half of the property.

4.8 Management of Sand

Dry sand is used as a traction aid for the contact area between locomotive wheels and the track rails but is not stored at the Facility. Sand is infrequently discharged at the Facility as part of normal locomotive operations. In general, traction sand is limited to the DTL fueling area and is periodically removed and disposed off-site in accordance with applicable rules and regulations.

5 SWPPP IMPLEMENTATION

The SWPPP must be implemented to comply with the rules set out in the General Permit. The Facility will comply with the terms of the SWPPP during operation. Implementation of the SWPPP will involve two major components:

- Identifying appropriate BMPS and associated implementation.
- Training employees to comply with the SWPPP and permit requirements.

5.1 BMP Implementation

Implementation of BMPs will involve a three-step process:

- Prioritizing BMPs;
- Developing an implementation schedule; and
- Assigning responsibilities for implementation to Team members.

5.2 BMPs Prioritization

BMP prioritization will take two factors into account: relative pollution potential and BMP effectiveness versus cost and speed of implementation. Relative pollution potential is a rating (low, medium, or high) given to the activity or source of potential pollution and in most cases will be determined by the Environmental Officer. The pollution potential rating will take into account:

- The quantity of a particular pollutant that the source or activity could potentially produce;
- The location of the source or activity with respect to the potential for contact with storm water;
- The frequency of potential exposure to storm water; and
- The potential for the pollutant to cause environmental impairment and/or liability.

5.3 Assigned Responsibilities for Implementation

Individuals on the Team will be assigned responsibilities for specific BMP implementation in accordance with the requirements of this SWPPP.

5.4 Education and Training

Employee participation and knowledge of the SWPPP directly impacts the effectiveness of its implementation. In order to maintain a clean, safe, and orderly facility where pollution is minimized, personnel must maintain a proactive attitude toward pollution prevention and recognize the importance of their individual contribution. Employees will be trained on the components of the SWPPP such as good housekeeping, preventative maintenance, proper material handling operations, following spill response plans, and identifying potential pollution causing conditions and implementing action to minimize pollution potential.

The educational effort may be conducted in several ways. Educational opportunities include, but are not limited to:

- Providing general information about the nonpoint pollution problem;
- Creating posters illustrating the concepts of the SWPPP;
- Conducting short seminars annually on implementation of the SWPPP in conjunction with safety training; and
- Listening and receiving comments from employees to make them part of the overall program.

Annual Employee Training Logs are included with this plan as **Appendix B**.

6 FACILITY MONITORING

The SWPPP Team for Brookhaven Yard is responsible for performing routine inspections, recordkeeping, and plan revisions required to keep the SWPPP current. This section summarizes these routine activities.

6.1 Certifications

The SWPPP will be reviewed by the IC Environmental Officer for correctness and appropriate implementation and will be developed in accordance with good engineering practices.

6.2 Visual Inspections

Visual inspections will be performed by designated individuals within IC who are qualified for this activity. The inspections will be documented on the MDEQ Monthly Inspection and Visual Evaluation Report Form in **Appendix D**.

In addition, monthly visual storm water observations which utilize jar sampling will be conducted to identify visual signs of contamination. Monthly observations will be documented on the MDEQ Monthly Visual Jar Test Inspection Form in **Appendix D**.

An annual review of the Monthly Inspections and Jar Testing Inspection forms will be conducted and recorded on the MDEQ Annual Comprehensive SWPPP Evaluation Report Form in **Appendix E**. The results of this annual evaluation will be utilized to determine the need for BMP modifications and/or improvements to storm water pollution controls. Corrective actions resulting from routine inspections will be recording in the Corrective Action Tracking Log in **Appendix F**.

Based on the monthly and annual inspections, modifications will be made to the SWPPP with regard to potential pollutant sources and prevention measures and controls. Implementation of changes in the SWPPP will occur in a timely manner.

6.3 Analytical Sampling

Analytical sampling is not required for Brookhaven Facility.

6.4 SWPPP Revision Process

The General Permit requires that the SWPPP be reviewed at least once annually by January 31 and revised when changes take place that would affect the discharge of pollutants to storm water. The process for determining what changes need to be made to the SWPPP is summarized in the flow chart in **Exhibit 6.1**. This flow chart summarizes the information that must be gathered by the Team, the review of information that must take place, and the method by which changes must be made in the SWPPP. Records of the review process are summarized and recorded on the table in **Exhibit 6.2**.

Should conditions at the Facility or operations being conducted within the Facility change significantly, this SWPPP should be modified for the new conditions and any BMP or other measures should be implemented within 30 days of observation.

Exhibit 6.1 - Flow Chart for SWPPP Revision Process

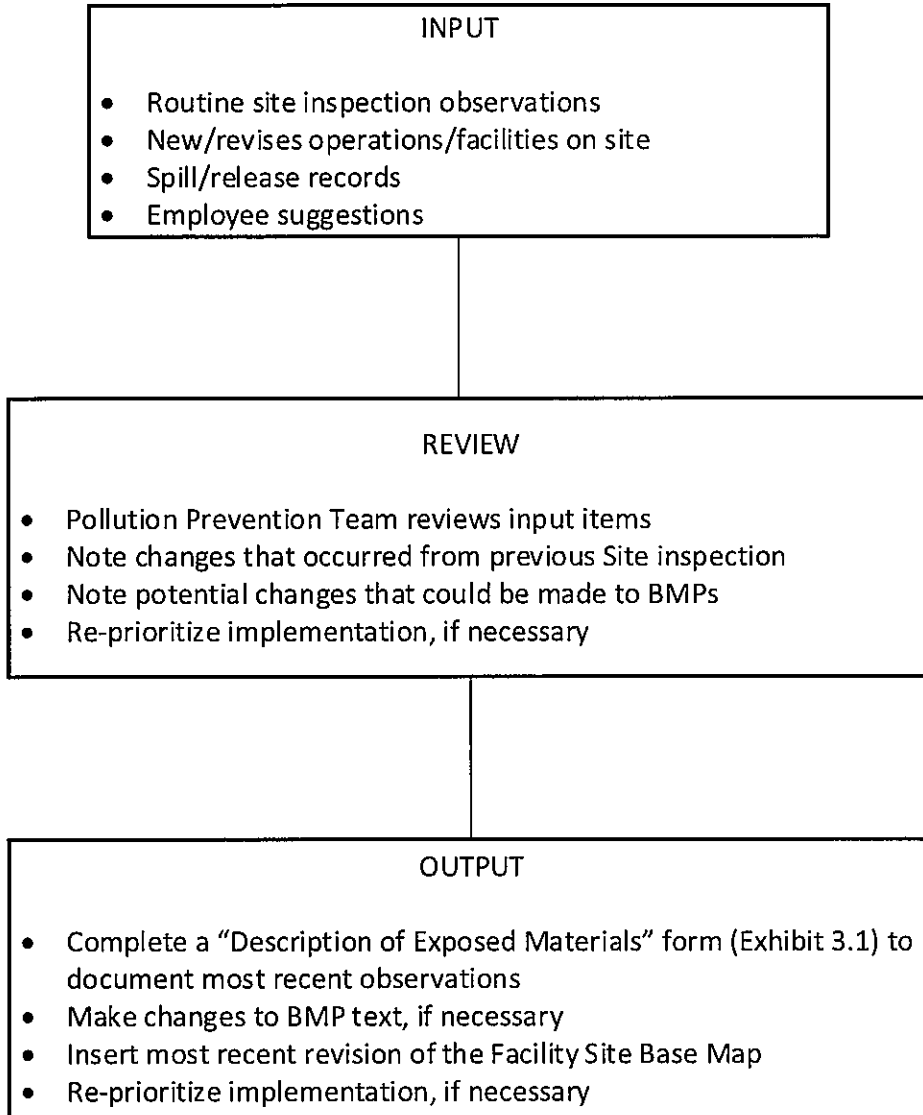


Exhibit 6.2– Revision Documentation

Date	Description	Approved By
September 2024	Initial SWPPP Development	Charles Brown

7 REPORTING AND RECORDKEEPING REQUIREMENTS

7.1 Annual Comprehensive SWPPP Evaluation

The Annual Comprehensive SWPPP Evaluation Form (see **Appendix E**) is to be completed annually to determine if amendments to the SWPPP are necessary. The report will identify incidents of non-compliance or pollution control failures at the Facility, and discuss changes made to the Facility or the SWPPP, reasons for the change, spills, spill response activities, inspection results, and other relevant information assessed by the Annual Comprehensive SWPPP Evaluation Form. The report will be signed in accordance with regulatory signatory requirements and filed with the SWPPP. If required, amendments will be submitted to the MDEQ OPC.

7.2 Record Keeping

Activities performed relating to storm water quality improvement and/or implementation of the SWPPP are required to be documented in a set of files, which can be accessed to prove compliance with the General Permit. The following documents are maintained electronically by the Environmental Officer as documentation of storm water permit compliance:

- A copy of the General Permit for Brookhaven Yard (provided in **Appendix A** of this SWPPP);
- A copy of the SWPPP, including latest revisions initialed and dated;
- Copies of notes and revised Facility Site Maps documenting changed Facility conditions;
- Documentation of corrective actions taken for any deficiencies found during monthly inspections or annual reviews;
- Copies of the MDEQ Employee Training Log (provided in **Appendix B** of this SWPPP), for training and education programs for topics related to SWPPP implementation;
- Electronic copies of Monthly Inspections and Jar Test Results.

Appendix C, Log of Significant Spills and Leaks will be used to document spills and leaks. Inspections will be documented electronically as appropriate.

All records, reports and information resulting from activities required by this permit shall be retained by the coverage recipient, at the Facility or in electronic format, for a minimum of three years from the date of generation.

8 ADDITIONAL STATE REQUIREMENTS

8.1 EPCRA Section 313 Requirements

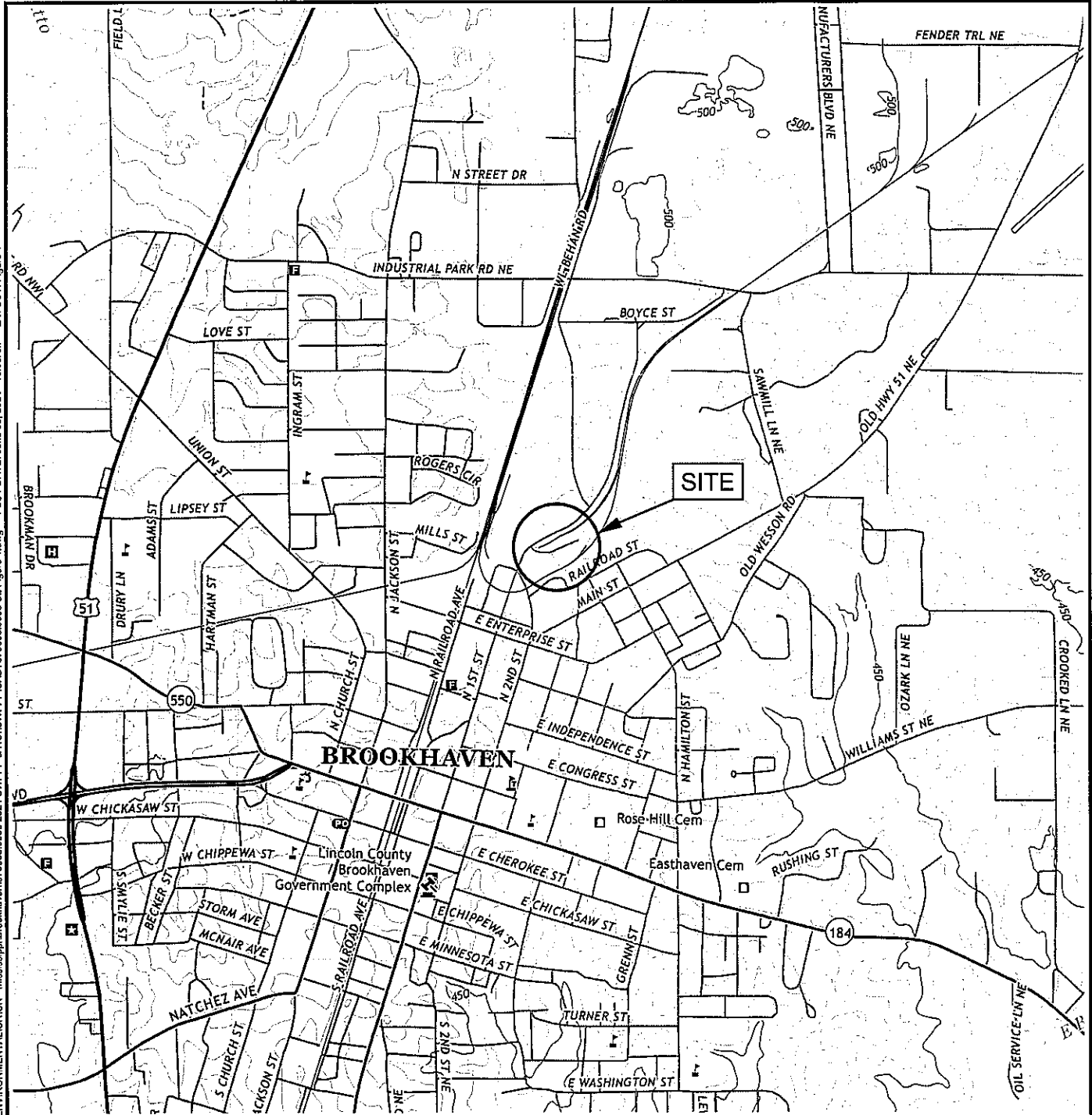
Brookhaven Facility is not subject to reporting requirements under EPCRA Section 313 for chemicals that are classified as Section 313 Water Priority Chemicals. Therefore, additional requirements of the Mississippi Storm Water Baseline General Permit relating to those types of facilities are not applicable.

8.2 Monitoring Requirements

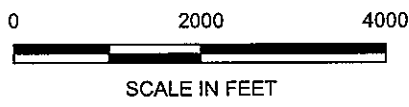
The Baseline Storm Water General Permit requires sampling only if the Facility is a SARA Title III, Section 313 facility that has had a significant spill or a facility with coal spills. The Brookhaven Yard does not qualify as a SARA Title III, Section 313 facility and does not have a coal pile, so the monitoring requirements under the General Permit are not applicable.


FIGURES

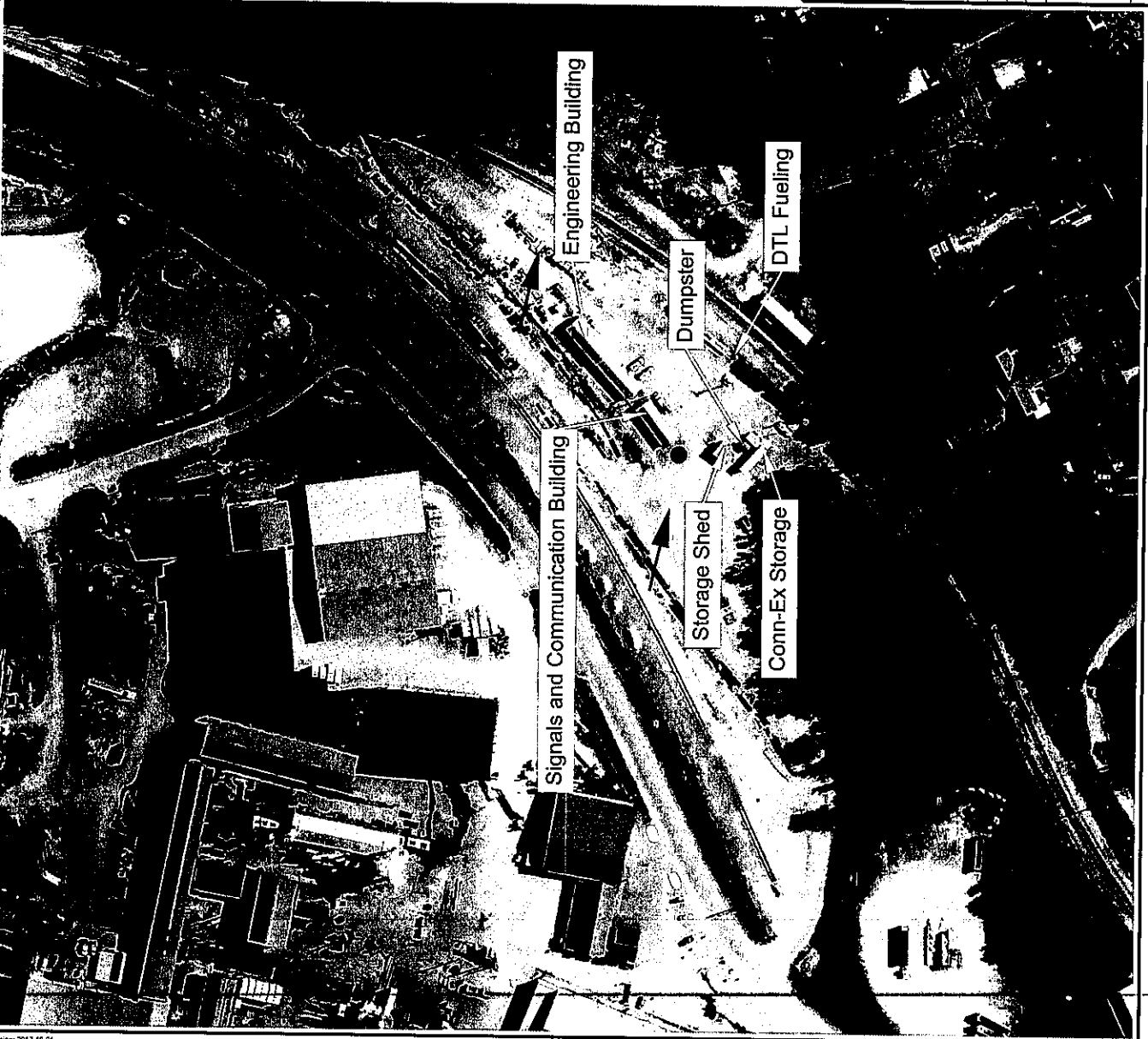
6441 - USER: USMA - ATTACHED SHEETS - ATTACHED SHEETS
 DRAWING NAME: \\EMPLOYEES_ROOT\local\env\ecw\working\DATA\ENV\IRONMENTAL\CN\576808.0003 2024 SWPPP & NOI\SWPPP\CAD\1 576808.0003 SL Figure 1.dwg - PLOT DATE: June 03, 2024 - 10:06AM - LAYOUT: Figure 1



REFERENCE: USGS 7.5 MINUTE
 TOPOGRAPHIC MAP
 BROOKHAVEN, MS 2020



PROJECT:		BROOKHAVEN YARD 805 WL BEHAN ROAD BROOKHAVEN MISSISSIPPI	
TITLE: SITE LOCATION MAP			
DRAWN BY:	K STARK	PROJ NO.:	576808.0003
CHECKED BY:	B O'CONNELL	FIGURE 1	
APPROVED BY:	G MACIONUS		
DATE:	JUNE 2024	 114 Edinburgh South Drive, Suite 200 Cary, North Carolina 27511 Phone: 919.827.0864 www.trccompanies.com	
FILE NO.:	576808.0003.SL.Figure-1.dwg		




LEGEND

-  DIRECTION OF SHEET FLOW
-  PROPOSED STORM WATER OBSERVATION POINT

NOTE:
1) AERIAL IMAGERY COURTESY OF MICROSOFT BING, 2024.



SCALE IN FEET

PROJECT:	BROOKHAVEN YARD 805 WL BEHAN ROAD BROOKHAVEN, MISSISSIPPI		
TITLE:	FACILITY SITE MAP		
DRAWN BY:	K STARK	PROJ. NO.:	576808.0003
CHECKED BY:	B O'CONNELL	FIGURE 2	
APPROVED BY:	C MACIONUS		
DATE:	JUNE 2024		
114 Edinburgh South Drive, Suite 200 Cary, North Carolina 27511 Phone: 919.827.0864 www.ltrccompanies.com			
			
FILE NO.:	576808.0003 FSM Figure 2.dwg		

APPENDICES

APPENDIX A
GENERAL PERMIT FOR STORM WATER DISCHARGES

APPENDIX B
EMPLOYEE TRAINING LOG

APPENDIX C
MONTHLY SPILL AND LEAK LOG

Facility Name _____

Monthly Spill & Leak Log Sheet

Month/Year _____

Physical Address _____



Coverage Number _____

Instructions: A list of spills and leaks of toxic or hazardous pollutants that have occurred at the facility shall be documented on the Monthly Spill and Leak Log Sheet that is provided in the Baseline Forms Package. A separate form shall be completed for each month that the facility is covered under this general permit. If no spills have occurred, the form shall be completed by checking the available box and signing it as indicated. Coverage recipients may use an alternate form to record this information, so long as it includes all of the information on the above referenced form and it is updated monthly. The completed forms shall be filed on-site with the SWPPP and made available to MDEQ personnel for inspection upon request. [Baseline General Permit ACT5 T-3 (4)]

Date of Spill	Material Spilled	Quantity Spilled <small>(specify units)</small>	Area that Spill Occurred	Did the Spill Result in a Discharge?	Injury / Property Damage?	Person(s) Involved In Clean-up	Date Reported to MDEQ <small>(If significant)</small>
Corrective Action(s) Taken							
Corrective Action(s) Taken							
Corrective Action(s) Taken							
<input type="checkbox"/> No spills have occurred this month.	<i>"I certify under penalty of law that this report is true, accurate, and complete, to the best of my knowledge and belief."</i>						
	Inspector's Name - Printed			Inspector's Signature			Date

APPENDIX D
INSPECTION 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 effectiveness 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 MDEQ personnel upon request.

FACILITY NAME: Brookhaven Yard **DATE:**

PHYSICAL ADDRESS: 826 W.L. Behan Road, Brookhaven, Mississippi 39601

WEATHER INFORMATION:

- Description of Weather Conditions (e.g., sunny, cloudy, raining, snowing, etc.):

- Was the inspection conducted during or immediately after a rain event? Yes No If yes, conduct a Jar Test at each storm water outfall and attach the results to this form.

I. POTENTIAL POLLUTANT SOURCE, AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION

<u>SWPPP AND SITE MAP:</u>	Yes	No	N/A	Findings & Remedial Action Documentation
<ul style="list-style-type: none"> Is the Site Map current and accurate? Is the SWPPP inventory of industrial activities, materials and products current? 	○	○	○	
<p>VEHICLE/EQUIPMENT AREAS:</p> <p>Equipment cleaning:</p> <ul style="list-style-type: none"> Is equipment washed and / or cleaned using a detergent(s)? If so, is all wash water captured and properly disposed of? <p>Equipment fueling:</p> <ul style="list-style-type: none"> Are all fueling areas free of contaminant buildup and evidence of chronic leaks/spills? 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? Are structures in place to prevent precipitation from accumulating in containment areas? If not, is there any water or other fluids accumulated within the containment area? 	○	○	○	

	Yes	No	N/A	Findings & Remedial Action Documentation
Equipment maintenance:				
• Are maintenance tools, equipment and materials stored under shelter, elevated and covered?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Are all drums and containers of fluids stored with proper cover and containment?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Are exteriors of containers kept outside free of deposits?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Are any vehicles and/or equipment leaking fluids? Identify leaking equipment.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Is there evidence of leaks or spills since last inspection? Identify and address.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• 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)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Add any additional site-specific BMPs:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

GOOD HOUSEKEEPING BMPs:				
1. Are paved surfaces free of accumulated dust/sediment and debris?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Date of last vacuum/sweep _____				
• Are there areas of erosion or sediment/dust sources that discharge to storm drains?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
2. Are there any waste receptacles located outdoors? If yes:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• In good condition?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Not leaking contaminants?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Closed when not being accessed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• External surfaces and area free of excessive contaminant buildup?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
3. Are the following areas free of accumulated dust/sediment, debris, contaminants, and/or spills/leaks of fluids?				
• External dock areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Pallet, bin, and drum storage areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Maintenance shop(s)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Equipment staging areas (loaders, tractors, trailers, forklifts, etc)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Around bag-house(s)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Around bone yards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
• Other areas of industrial activity:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

NON-STORM WATER DISCHARGE EVALUATION AND CERTIFICATION

Worksheet #2c

Outfall No.	Date of Evaluation	Method Used to Test or Evaluate Discharge	If Evaluation is Impossible Give Reason	Is Non-Storm Water Being Discharged? (Yes/No)	List Likely Sources of Non-Storm Water Discharges	Person(s) Who Conducted the Test or Evaluation

CERTIFICATION

I certify under penalty of law that is, to the best of my knowledge and belief, true, accurate, and complete (see permit Part V.G.).

A. Name & Official Title (type or print)

B. Area Code and Telephone No.

C. Signature

D. Date Signed

(Make additional copies of this form as needed)

APPENDIX E
ANNUAL REPORT

II. DESCRIPTION OF STORM WATER MANAGEMENT CONTROLS (CONTINUED)

<u>ILLCIT CONNECTIONS EVALUATION AND CERTIFICATION</u>	Yes	No	Findings & Remedial Action Documentation
<ul style="list-style-type: none"> • Does the SWPPP contain an illicit connection certification? • If so, was the certification evaluation and certification completed within the last 5 years? • Does the certification include the following?: <ul style="list-style-type: none"> ○ Method of evaluation, date(s), observation point(s), and result(s). 	<input type="radio"/> <input type="radio"/> <input type="radio"/>	<input type="radio"/> <input type="radio"/> <input type="radio"/>	
<p><u>ROUTINE VISUAL SITE INSPECTIONS</u></p> <ul style="list-style-type: none"> • Does the SWPPP describe the policy and procedures for routine visual inspections, including frequencies and areas to be inspected? • Does the SWPPP inspection policy describe procedures for collecting storm water if the inspection is conducted during or after a storm event? • 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? 	<input type="radio"/> <input type="radio"/> <input type="radio"/>	<input type="radio"/> <input type="radio"/> <input type="radio"/>	
<p><u>STORM WATER MANAGEMENT</u></p> <ul style="list-style-type: none"> • Does the SWPPP provide for the management of storm water volume through its diversion, infiltration, storage or re-use? 	<input type="radio"/>	<input type="radio"/>	
III. NON-STORM WATER DISCHARGE MANAGEMENT			
<p><u>NON-STORM WATER MANAGEMENT</u></p> <ul style="list-style-type: none"> • Does the SWPPP identify any allowable non-storm water discharges identified in ACT2 T-3? • Does the SWPPP identify and ensure the implementation of appropriate Best Management Practices (BMPs) for the non-storm water component of any discharge? • Have there been any changes or additions to the allowable non-storm water discharges since the previous Annual SWPPP Evaluation? 	<input type="radio"/> <input type="radio"/> <input type="radio"/>	<input type="radio"/> <input type="radio"/> <input type="radio"/>	
IV. FACILITY CHANGES			
<p><u>SWPPP AMENDMENT</u></p> <ul style="list-style-type: none"> • Has 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? <p>If so, amend the SWPPP and submit it to the MDEQ within 30 days of amendment. (ACT9 S-1 (4))</p>	<input type="radio"/>	<input type="radio"/>	

APPENDIX F
CORRECTIVE ACTION TRACKING LOG

**Brookhaven Yard
Inspection Observations and Corrective Actions**

Date of Inspection:		Type of Inspection:	
Outfall/Operational Area Observed:			
Description of Observation Requiring Corrective Action			
Identified Cause:			
Date of Corrective Action:			
Description of Corrective Action(s) Taken			
Date of Inspection:		Type of Inspection:	
Outfall/Operational Area Observed:			
Description of Observation Requiring Corrective Action			
Identified Cause:			
Date of Corrective Action:			
Description of Corrective Action(s) Taken			



114 Edinburgh S. Drive, Ste. 200 T 919.827.0864
Cary, NC 27511 TRCcompanies.com

September 10, 2024

Chief, Environmental Permits Division
MS Department of Environmental Quality
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225

SUBJECT: Submission of Notice of Intent (NOI) for Permitted Coverage Under the Industrial Storm Water General National Pollution Discharge Elimination System (NPDES) Illinois Central Railroad – Brookhaven Yard, Brookhaven, MS

To Whom It May Concern:

TRC Environmental Corporation (TRC) is submitting this NOI on behalf of Illinois Central Railroad (ICRR) to obtain coverage under the Industrial Storm Water General National Pollution Discharge Elimination System for the ICRR – Brookhaven Yard, located in Brookhaven, Lincoln County, Mississippi. Attached is the NOI Permit Application Package, including the Storm Water Pollution Prevention Plan (SWPPP), developed specifically for Brookhaven Yard.

If you have any questions about the NOI Permit Application or SWPPP, please contact Charles Brown at (601) 592-1838 or at Charles.Brown2@cn.ca.

Sincerely,

Bethany O'Connell
Assistant Project Manager

cc: Charles Brown, IC
Chelsea Macionus, TRC

Attachment

RECEIVED
SEP 18 2024
Dept. of Environmental Quality

Attachment
Notice of Intent Permit Application