

AI: 66504



INDUSTRIAL STORMWATER NOTICE OF INTENT (ISNOI)

FOR COVERAGE UNDER THE INDUSTRIAL STORMWATER

GENERAL NPDES PERMIT MSR00 2514

(NUMBER TO BE ASSIGNED BY STATE)

RECEIVED
OCT - 8 2025

INSTRUCTIONS

MDEQ

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: Cary Clemmer Position: EHS Manager
 Owner Company Name: Grammer Inc.
 Owner Street (P.O. Box): 231 Laney Rd
 Owner City: Shannon State: MS Zip: 38868
 Owner Phone Number: (662) 566-1660 Owner Email: cary.clemmer@grammer.com

OPERATOR INFORMATION (if different than owner)

Operator Contact Name: Same as above Position: _____
 Operator Company Name: _____
 Operator Street (P.O. Box): _____
 Operator City: _____ State: _____ Zip: _____
 Operator Phone Number: (____) _____ Operator Email: _____

OL.

FACILITY INFORMATION

Facility Name: Grammer Inc.

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

SIC Code: 5013 Motor Vehicle Supplies & New Parts

Receiving Stream: Coonewah Creek, Lee County

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: 231 Laney Rd City: Shannon

County: Lee Zip: 38868

Latitude: 34 degrees 161 minutes 239 seconds Longitude: -87 degrees 700 minutes 084 seconds

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

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):

No additional permits

How will sanitary sewage be collected and treated? Lee County POTW

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: _____

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)

September 22nd, 2025

Date Signed

Paul Ward

Printed Name¹

Plant Manager

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

**Grammer, Inc.
Storm Water Pollution
Prevention Plan**



**Prepared by:
EHS Concepts, LLC
Tupelo, MS**

**Issued: August 15th, 2025
Revised:**

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Appendices

- A. Mississippi Department of Environmental Notice of Intent Storm Water Permit Form
- B. Site Maps (Topo, Drainage Map, Emergency Equipment Map)
- C. Raw Materials Inventory List & Best Management Practices
- D. Mississippi Department of Environmental Quality Storm Water Forms Pack
- E. Emergency Contacts & Procedures
- F. Incident Report Forms
- G. Annual Comprehensive Site Evaluation Reports

1.0 Introduction

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SWPP

1.1 Purpose

This Storm Water Pollution Prevention Plan (SWPPP) has been developed for Grammer, Inc. Shannon, Mississippi to address ways to manage, respond and operate to minimize the possibility of causing storm water pollution. The SWPPP is a requirement of the Mississippi Department of Environmental Quality, Office of Pollution Control (MDEQ-OPC) (the State) General Permit.

The SWPPP is designed to achieve two (2) main objectives:

1. Identify potential sources of pollution.
2. Describe methods the facility will utilize to maintain compliance and reduce the amount of pollutants carried in the discharging storm water.

A copy of the Notice of Intent information submitted to be covered under the State's General Permit is enclosed in Appendix A.

1.2 Definitions

"Best management Practices" (BMPs) are measures or practices used to reduce the amount of pollution entering surface water, air, land or groundwater. BMPs may take the form of a process, activity or physical structure. BMPs include but are not limited to the list below.

1. Good Housekeeping Practices
2. Preventive Maintenance
3. Visual Inspection
4. Spill Prevention and Response
5. Sediment and Erosion Control
6. Management of Runoff

"Significant Materials" includes, but is not limited to: raw materials; fuels; materials such as metallic products; raw materials used in production; hazardous substances designated under Section 101(14) of CERCLA; any chemical the facility is required to report to Section 313 of Title III of SARA; fertilizers; pesticides; and waste products such as ashes, slag and sludge that have the potential to be released with storm water discharges.

"Section 313 Reporting Facilities" are facilities that handle toxic chemicals in amount exceeding threshold levels (listed at 40 CFR 372.25) and required to report to the government on an annual basis.

"Section 313 Water Priority Chemicals" have been identified by the Environmental Protection Agency (EPA) to include over 200 chemicals that are especially toxic to water ecosystems which applies only to Section 313 Reporting Facilities.

2.0 Storm Water Pollution Prevention Assessment

This section targets the most important pollutant sources for corrective and/or preventive action, thus using a "risk-based" approach to environmental protection.

2.1 Site Features

All site features related to the SWPPP area shown in Appendix B.

2.1.1 Surface Waters, Outfalls and Drainage Areas

All storm water runoff flows to a tributary, then to Coonewah Creek. Outfalls from the facility area listed and shown in Figure 2.1-1 in Appendix B.

- Outfall No. 1 is located: on the North West side of the property.
(drainage from North/West sides)
- Outfall No. 2 is located: on the South West side of the property
(drainage from East/South)

The facility drainage system drains storm water away from the facility on the East and West sides of the property flowing in a west direction toward Hwy 45. Dock bays located on the Eastern side of the facility are drained to these East/South drainage ditch systems.

Drainage areas are also indicated in Appendix B.

2.1.1 Structural Storm Water Controls

Grammer, Inc. currently only stores scrap containers, waste dumpsters, and empty totes collection outside to avoid contamination of storm water runoff. All of which are closed container drums or totes located on parking lot. All dumpsters and waste collection units (non-covered) are inspected for visual signs of runoff during SWPP inspection process. The areas are managed through best practice housekeeping, and scrap is contained within storage pads on East side of facility. All external storage is either stored on storage pads and visually inspected or stored under roof protected from stormwater and contained within dock bays.

2.2 Potential Sources of Storm Water Pollution

The main potential sources of storm water pollution are listed below along with best management practices for managing these potential sources.

Sources	Location	Control Measures
Used Oil Storage	East Side Storage	Under roof, contained storage
Lift Maintenance	Under roof, inside	Under Roof / Indoors Maint
General Waste Collection / Scrap Metal Hoppers	East Side Property	Daily Housekeeping, concrete storage pad
Raw Materials	Main Building Indoors	Under Roof
Emergency Diesel Pump	North East Property	Contained Indoors, Slab
Compressor Room	West Side Property	Under Roof, Enclosed Building

2.2.1 Material Inventory

Material Inventory for Grammer, Inc. facility can be found in Appendix C.

2.2.2 Exposed Significant Material Inventory

Exposed significant materials inventory for the Grammer, Inc. facility can be found in Table Appendix C.

2.2.3 Identification of Past Spills and Leaks

There have not been any significant spills and leaks at the location since Grammer, Inc. began ownership and production operations. The monthly spill log shall serve as documentation and certification of any spill activities or lack of.

2.2.4 Non-Storm Water Discharges

No non-storm water discharges are able to leave the site under normal conditions. All loading docks are sloped toward the building to prevent run off, thus preventing containment run off.

2.2.5 Current Storm Water Monitoring Data

Currently, there is no storm water monitoring data for the Grammer, Inc. facility. The facility utilizes qualitative measures to monitor such as visual site inspections, monthly jar testing, and best management practices. These practices shall continue unless unforeseen events was to occur (spill, changes in requirements, etc).

2.2.6 Assessment Summary

Grammer, Inc. is located on Laney Rd in Shannon, MS within the South Lee Industrial Park. The plant manufactures various types of interior components for Automotive industry including plastic injection molding. Processes used to manufacture components include but are not limited to plastic injection molding, interior door/seal components, and light assembly.

The following areas are areas with the potential to have impact on storm water.

1. Storage pad and area on the East/South side of the facility
2. Dock bays are located on the East side of the facility.
3. Waste storage area on East side (compactor, scrap, used oil, etc)

2.3 Section 313 Requirements & Raw Material Inventory

Grammer, Inc. has the following EPCRA Section 313 Chemicals and is therefore subject to the Emergency Planning and Community Right-to-Know Act.

3.0 Best Management Practices Identification

3.1 Good Housekeeping

3.2 Visual Inspection

The yearly inspection form is shown in Appendix D.
The monthly inspection form is shown in Appendix D. The monthly inspection shall include “jar” testing when applicable storm water flow is present. In addition, the monthly inspection should be done during storm events when applicable or able.
The monthly spill log form is shown in Appendix D.

3.3 Spill Prevention and Response

Identification of spill response equipment is found in Appendix C.

3.4 Specific Equipment

Identification of spill response equipment available at Grammer, Inc. facility is found in Appendix B.

3.5 Sediment and Erosion Control

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Grammer, Inc. currently utilizes guttering, directional drainage system running the East/South and West side of the facility to prevent or reduce the discharge of pollutants in storm water runoff. All runoff is collected within drainage ditches running both East side and West side of the facility with outfall to the South, and North/West.

4.0 Implementation

The implementation of the Storm Water Pollution Prevention Plan is planned for September 2025. During this time and moving forward Grammer, Inc. shall comply with MS Baseline Storm Water requirements set forth under MS code.

4.1 Appropriate Controls

A schedule for implementing each BMP is found in Appendix C.

4.2 Employee Training

Employees with potential to create exposure shall receive annual training as part of the EHS compliance training program. The facility conducts storm water pollution prevention training annually as part of the training requirements.

4.3 Monitoring Requirements

SARA Chemicals are listed in Section 2.3 therefore Grammer, Inc. is subject to the monitoring requirements as established by the State's General Permit requirements, if EPA Form Rs for the year indicates the release of any of these chemicals to storm water has occurred. In addition, the following should be recorded:

- The date and duration (in hours) of the storm sampled.
- Rainfall measurements or estimates (in inches) of the storm which generated the sampled runoff.
- The duration between the storm sampled and the end of the previous measurable (greater than 0.1-inch rainfall) storm; and
- An estimate of total discharge (gallon) for the storm sampled.

A State issued storm water-monitoring requirements; Grammer is subject to the following requirements:

- There shall be no distinctly visible floating scum, oil or other matter contained in the storm water discharge.
- The storm water discharge must result in no materials in concentrations sufficient to be hazardous or otherwise detrimental to humans, livestock, wildlife, plant life, or fish and aquatic life in the receiving stream.
- Sludge or any other material removed by any treatment works must be disposed of in a manner which prevents its entrance into or pollution of any surface or substance waters. Additionally, chemicals in concentrations that would cause violations of State Water Quality Criteria in the receiving water will not be allowed.
- The storm water discharge must not cause an objectionable color contrast in the receiving stream.

- Water must be inspected with a jar test monthly.
- Sampling of storm water discharge in the event of non-storm water discharge to outfall

5.0 Emergency Response Procedures

5.1 Notification

In the event of an emergency, the Emergency Coordinator will be notified. He will immediately activate or cause internal communications systems to be activated in order to notify operating personnel; and will notify or cause to be notified of all appropriate response agencies whose help is needed. Emergency Coordinators and telephone numbers are listed in Table I in Appendix E.

5.2 Identification of Hazardous Waste

If there is a fire, explosion, release, and/or flood, the Emergency Coordinator will, via visual examination, immediately determine the exact source, amount and real extent of any released hazardous waste.

5.3 Assessment

The Emergency Coordinator will assess possible hazards to human health or the environment as a result of the emergency incident by combining his site observations with his knowledge of the materials and waste stored in the area, the volumes present and their hazardous nature. His assessment will also be influenced by available control measures and emergency equipment. The Emergency Coordinator will assess both the short and long-term effects of the event. Examples of long-term effects could include effects of toxic vapors on personnel or pollution from run-off generated in the fire-fighting process. If the Emergency Coordinator determines that the incident could be harmful to personnel in any area at the plant or in the surrounding area, he may order evacuation of the affected area(s).

If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether the local area should be evacuated; and he must immediately notify either the government official designated as the on-scene coordinator for that geographical area or the National Response Center and the Mississippi Department of Environmental Quality or the Mississippi Department of Public Safety. The telephone numbers for these agencies are found in Appendix E. The report must include:

- Name and telephone number of the person reporting.
- Name and address of the facility.
- Time and type of incident (e.g., release, fire);
- Name and quantity of material(s) involved to the extent known.
- The extent of injuries, if any; and
- The possible hazards to public health, or the environment, outside the facility.

Personnel will not return to the affected area(s) until authorized by the Emergency Coordinator.

5.4 Control Procedures

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Should a fire, explosion, release and/or flood occur, the Emergency Coordinator will take all measures necessary to contain the incident within the affected area and will notify the appropriate personnel. Descriptions of control and containment procedures of some potential incidents are below.

5.4.1 Fire and/or Explosion

The Emergency Coordinator will be notified in case of any fire. In the event of a small, localized fire, an employee in the immediate area will notify the switchboard, then promptly attempt to extinguish it by using a fire extinguisher located in the area. Multi-purpose type A, B, C fire extinguishers are in or near all areas where flammable materials are present.

All feed lines and equipment will shut down as necessary and practical. All flammable substances will be removed from the area to the extent practicable.

Should a major fire occur and water, in addition to that provided by the sprinkler system, be needed to extinguish the fire, fire hose connections are available.

Work in the immediate area and all nearby areas will be shut down immediately. The areas will be cleared of all personnel who are not actively involved in fighting the fire. These people will gather outside in the main parking lot for accountability.

5.4.2 Plant Evacuation

If the Emergency Coordinator determines the incident to lie within the company's emergency response capabilities, the Emergency Coordinator will contact and deploy the necessary in-plant personnel. If the incident is beyond plant capabilities, the Emergency Coordinator will contact the appropriate agencies to request assistance. A list of agencies and telephone numbers can be found in Appendix E.

Any injured persons will be removed and qualified personnel will administer medical treatment. Should additional assistance be required North Mississippi Medical Center (Tupelo) will be called upon to assist.

Containers and the accumulation storage area facility area easily accessible by fire-fighting and other emergency vehicles and equipment. Designated company personnel, under the direction of the Emergency Coordinator, will concentrate their efforts on personnel safety and prevent the spread of a fire to nearby areas. Legacy Boat's employees will carry out the effort until outside assistance arrives.

Should outside fire and/or medical assistance be needed and/or plant evacuation is deemed advisable, the Verona/Shannon Fire Departments (AFD) and Lee County Sheriff will be called in to assist in traffic control. This will ensure unobstructed access into and out of the site.

Should Grammer, Inc. operations stop because of an emergency, the Emergency Coordinator or his designate will visually, or with other means at his disposal, monitor for leaks, pressure build-up, gas generation or ruptures in valves, pipes, tanks or other equipment.

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The Emergency Coordinator will give an "all clear" signal when the fire has been extinguished and the safety of personnel is no longer threatened.

5.4.3 Release

In the event of a small-localized spill or a release of waste paint related material, an employee in the area will contain the spill, contact their supervisor, and clean-up spill under supervision of supervisor. All material cleaned up will be disposed properly as hazardous waste.

A specific area (hazardous waste storage area) within the confines of the property is designated to house drums of waste. Waste released from the drums would be confined within this area and from there transferred, under the direction of the Emergency Coordinator to containers for proper treatment, storage and/or disposal.

If a major release occurs, the Emergency Coordinator will be notified. He will assess the extent of surface contamination to determine if a hazardous situation exists.

Because fire and/or toxic vapors are always a potential hazard in spills of any waste, possible sources of ignition will be eliminated by the Emergency Coordinator or his designate. Vehicular traffic and work in the area will cease until the spill is contained and safe conditions are restored.

People not assisting the Emergency Coordinator will be evacuated from the area. Those assisting will isolate the hazard area, wear air-purifying respirators (APRs) with appropriate cartridges to absorb potentially harmful vapors and wear full protective clothing. They will apply absorbent to reduce vapors and place a primary and secondary dike far ahead of the spill to prevent run-off from the site.

Personnel not actively involved in these operations will gather outside in the main parking lot for accountability.

Upon discovery, every appropriate measure will be taken to stop and monitor the release at its source. Feed lines will be shut off and repairs, as applicable, will be initiated.

Personnel overcome by vapors will be moved to fresh air and qualified personnel will administer medical treatment. Should additional assistance be required the North Mississippi Medical Center will be contacted (Appendix E) and called upon to assist.

If the accident is determined to lie within the company's emergency response capabilities, the Emergency Coordinator will contact and deploy the necessary personnel. If the accident is beyond plant capabilities, the Emergency Coordinator will contact outside contractors and the appropriate agencies. A list of agencies and telephone numbers can be found in Appendix E.

Should outside medical assistance be needed and/or plant evacuation deemed advisable, the Verona Fire Department and Lee County Sheriff will be called in to assist.

The Emergency Coordinator will give an "all clear" signal when the safety of personnel is no longer threatened.

5.4.4 Flood

This plant is not located in a 100-year flood plain; hence, no plan addressing this event has been developed. References to floods throughout this plan address flash floods resulting from localized heavy rain.

5.5 Prevention of Recurrence

During an emergency incident, the Emergency Coordinator will take all reasonable precautions to prevent the recurrence or spread of the incident to other areas containing hazardous waste. All equipment, which may generate a spark, feed systems and process equipment around the incident, will shut down. In case of a fire, containers of hazardous waste that can be moved safely will be moved and isolated from the area involved. The Emergency Coordinator will initiate measures to collect and contain released waste materials as appropriate to incident conditions. These follow-up actions listed below are to be performed by the Emergency Coordinator or his designate:

1. Investigate the cause of the emergency incident and submit a formal report to management as soon as possible.
2. Ensure that proper decontamination, clean-up and restoration actions are carried out as soon as practicable; keep a record of all such actions performed and
3. Ensure the equipment required or replaced as a result of an incident is re-certified, as necessary, prior to being placed back in service.

5.6 Storage and Treatment of Released Material

Immediately after an emergency, the Emergency Coordinator will assure all released material is contained in appropriate 55-gallon drums available on site. Should an independent contractor be needed to assist in clean up or disposal activities, Legacy Boat's will contact their current waste vendor and an Environmental Response Team from nearest location. (Safety Kleen Solutions Emergency Response Services or secondary source United States Environmental Services "USES")

5.7 Post-Emergency Equipment

After an emergency event, any emergency equipment used will be cleaned, as to be fit for reuse or replaced as appropriate. The Emergency Coordinator or his designate will inspect clean and/or replacement equipment and certify its fitness for its intended use before hazardous waste operations are resumed.

5.8 Container Spills and Leakage

If any container holding hazardous waste is found to be leaking or one that is rusted or damaged to the extent that a leak is likely, the contents of the container will be transferred to another container which is in good condition by the Emergency Coordinator or his designate.

The Environmental Manager will inspect the hazardous waste accumulation storage area weekly to determine the condition of all containers of hazardous waste and emergency equipment.

5.9 Emergency Equipment

A summary of all emergency spill equipment is shown in Table 3.3-1 of Appendix C. Specific items are discussed in the following paragraphs.

Grammer, Inc. employs several mechanisms for fire control. They possess multi-purpose A, B, C portable fire extinguishers. These are mounted or stationed throughout the plant.

Fire hose connections are located at numerous locations near the inside of the facility as well as fire hydrants around the perimeter.

There is a sprinkler system that is activated automatically in the event of a fire or explosion.

There is eyewash stations located throughout the building in all areas where chemical exposure might occur.

Grammer, Inc. has spill kits placed throughout the plant where exposures warrant such emergency equipment.

6.0 Evaluation

The SWPP will be evaluated annually for any revisions or changes to the facility, personnel, operations or other noted changes. If a change is noted the plan will be revised and redistributed as appropriate.

6.1 Annual Site Compliance Evaluation

The facility will conduct a comprehensive site compliance evaluation at least once a year. The evaluation will include the following:

- Review of the SWPPP and compiling a list of those items that are part of material handling, storage and transfer covered by the plan.
- A list of all equipment and containment in those areas covered in the plan.
- Review facility operations for the past year to determine if any additional areas should be included in the plan or determine if any existing areas were modified which would require plan modification.
- Conduct inspection to determine:
- If all storm water pollution prevention measures are accurately identified in the plan, and are in place and working.
- Based on findings, prepare a report summarizing inspection results and follow up actions, the date of inspections and person who conducted the inspection; identify any incidents of noncompliance and certify that the facility is in compliance with the plan. All incidents of non-compliance will be documented in the inspection report. Where there are no incidents of non-compliance, the inspection report will contain a certification that the facility is in compliance with the plan.
- Annual Certification shall include inspection dates and findings.

The evaluation report will be inserted in Appendix H and become part of the SWPPP. Based on the results of the evaluation, the plan will be revised as needed and implementation of any changes or modifications to the plan will occur no later than twelve weeks after the inspection.

6.2 Monthly Visual Site Inspections

A visual site inspection shall be conducted monthly of the entire perimeter of the facility including all loading docks, compactors, dumpster locations, storage pads and any other areas where materials are handled that is not covered under a canopy. In addition, any areas that are identified to have been sites of past spills shall be inspected. These areas shall be identified in section 2.2.3 of this document. All of the aforementioned areas shall be inspected for evidence of pollutants entering the drainage system or other conditions that may give rise to pollution of storm water runoff. The inspection shall be conducted utilizing the Monthly Visual Site Inspection form located in Appendix D. This inspection shall include the use of jar testing during the monthly.

In the event an issue is identified it shall be recorded on the Monthly Visual Site Inspection form. Corrective actions for the issues identified shall be recorded and tracked to completion on the Monthly Visual Site Inspection form.

6.3 Recordkeeping and Reporting Requirements

All records relating to the SWPPP will be maintained for three (3) years following the permit's expiration.

Documentation for any spills, leaks and other discharges will be on the SWPPP incident report form, such as the one shown in Appendix F.

A Mississippi Inspection Report and Certification form is provided in Appendix I that will be completed and submitted to the State on an annual basis.

6.3 Plan Revisions

The SWPPP will be amended whenever there is a change in design, construction, operation or maintenance, which may impact the potential for pollutants to be discharged or if the SWPPP proves to be ineffective in controlling the discharge of pollutants.

Based on the Annual Comprehensive Site Evaluation, if any revisions are necessary, the SWPPP will be amended.

7.0 Administrative Requirements

The plan administrator (Grammer, Inc.) shall ensure all inspection records (monthly, annually, etc) are kept up to date as well as the site Storm Water Pollution Prevention Plan. The administrator shall also ensure that the site operator re-certifies that no "Non" Storm Water Discharges have occurred every five years in conjunction with permit renewal process.

7.1 Schedule for Implantation

Implementation will be September 2025, during which time Grammer, Inc. will begin inspections under the assumption MDEQ General Baseline Storm Water permits.

7.2 Required Signatures



Grammer, Inc.
SWPP

The plan administrator will serve as the administrator and duly authorized site inspection individual. The site President will serve as the certifying officer for required annual certifications, permit modifications, or renewals.

7.2.1 Plan Location and Public Access

A copy of the SWPPP was submitted to the State and two copies are maintained at Grammer AG, Inc. The copies at Grammer, Inc. are kept in the HR / Administration Office.

7.3 Director-Required Plan Modifications

Any changes required by the State will be made within 30 days, unless otherwise provided by notification. Grammer, Inc. will submit a signed certification, such as that in Appendix G, to the State that the requested changes have been made.

7.4 Renewal of Permit

The Baseline permit will be renewed every five years prior to expiration or at such time the site chooses to go no exposure.

8.0 Special Requirements

8.1 Special Requirements for Discharges through Municipal Separate Storm Sewer Systems

Grammer, Inc., does not discharge through the Municipal Storm Sewer System.

Certification of Illicit Connections

Date 9/22/2025
Locations: Grammer, Inc.
231 Laney Rd
Shannon, MS 38868
Permit#

The execution and signatory certification of the document shall serve as official certification that "no" illicit connections related to storm water have occurred, been witnessed, or made aware of during this period. In accordance with MDEQ



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baseline storm water requirements act 5 condition T7 the facility outfall #001 and outfall#002, along with external storage areas and dumpster storage areas have been visual inspected along with the site map in verification of no changes or illicit connections with storm water discharge for the permitted property and outfalls.

Documents: SWPP, Site Map, Outfall #001, Outfall #002
Method: Visual Inspection, Conditions Dry

Date: 10/1/2025

Signature: PAUL WARD



Appendix C

Schedule of Best Management Practices	Best Management Practice (BMP)
Cleaning of Loading docks including around scrap and trash hoppers	Monthly
Grounds pickup	Monthly
Outfall Inspection (Visual, Jar Test, spill log)	Monthly
Employee Storm Water Training	Annual
Fire Pump House / Diesel Tank	Monthly
Annual SWPP Certification	Annual

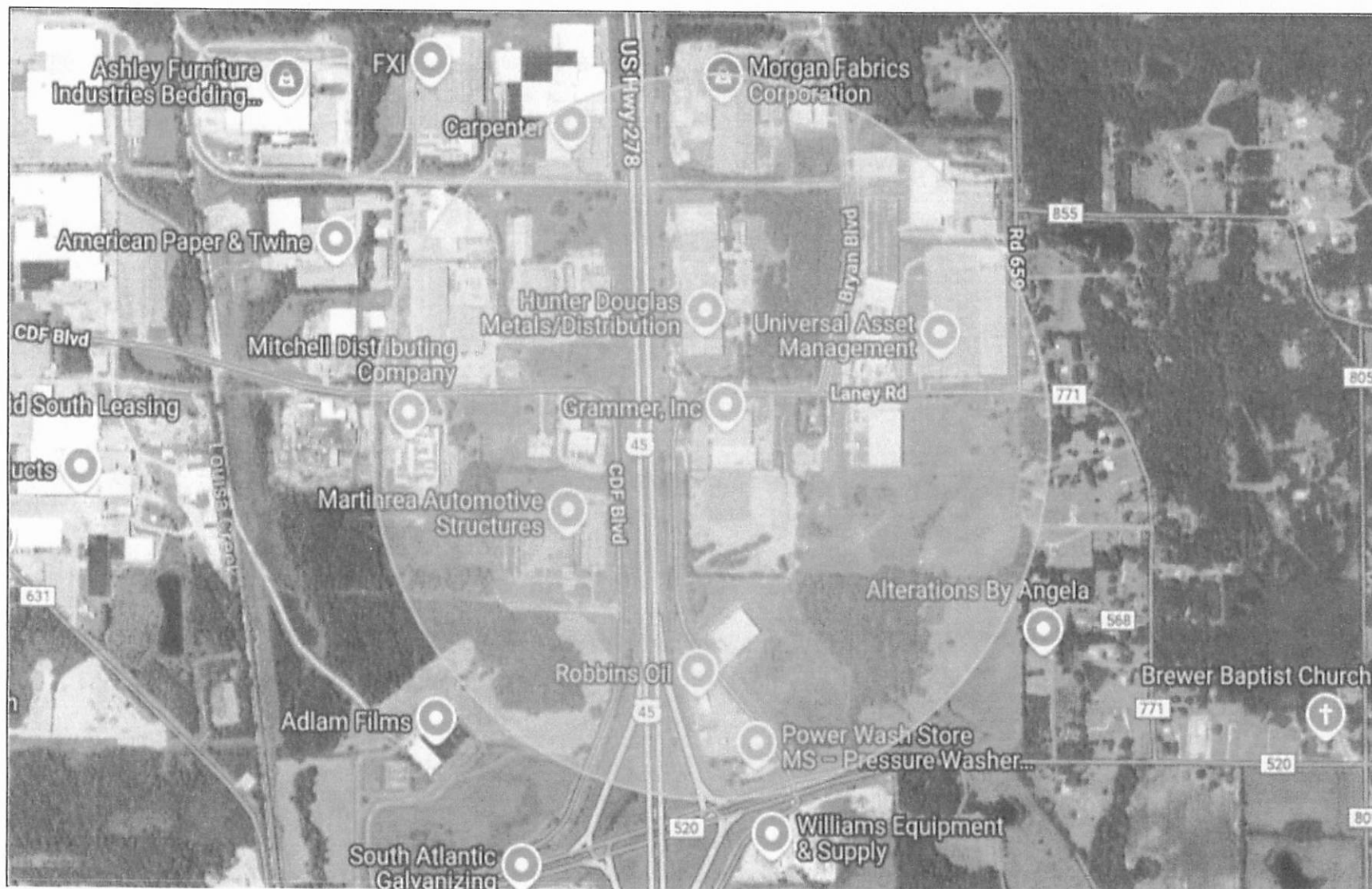
Spill Response Equipment	Spill Kit Type
Loading Docks (Receiving/Shipping)	Universal
Injection Molding	Universal
Maintenance	Universal



	Raw Material Inventory	
Product Name	CAS #	Chemical Name
Sitka Adhesives	822-06-0	HDI
Sitka Hardner	822-06-0	HDI
ABS Resin	100-4-25	Styrene
Mold Release Spray		
Hydraulic Oil	64742-54-7	Hydraulic Fluid/Oils

Exposed Material Inventory	Preventative Measure
Scrap Hoppers	Visual Monitoring/Inspection
General Trash Dumpsters	Visual Monitoring/Inspection
Material Storage Pad	Visual Monitoring/Inspection

SWPP NOTIFICATION CONTACTS			
Position / Source	Internal / External	Name	Phone #
SWPP Coordinator	Internal	Cary Clemmer	662-397-8803
Plant Manager	Internal	Paul Ward	219-405-3356
National Response Center (NRC)	External	NRC	800-424-8802
Local Emergency Response	External	911 Lee County Sheriff Fire Department North MS Medical Center	911 662-841-9040 662-481-6439 662-377-3000
Mississippi Department of Environmental Quality	External	MDEQ	601-961-5171
Local Emergency Planning Committee (Lee County Emergency Management)	External	LEPC	662-432-2950
National Response Center	External	NRC	800-424-8802
US EPA Regional Administrator	External	US EPA	312-353-2000
Mississippi Emergency Management Association	External	SERC	800-222-6562
Safety Kleen	External / Contractor	Cleanup Services	800-323-5040 Emergency: 888-375-5336



Grammer Americas-Shannon
 231 Laney Road
 Shannon, MS 38868

Legend:
 1/2-mile radius



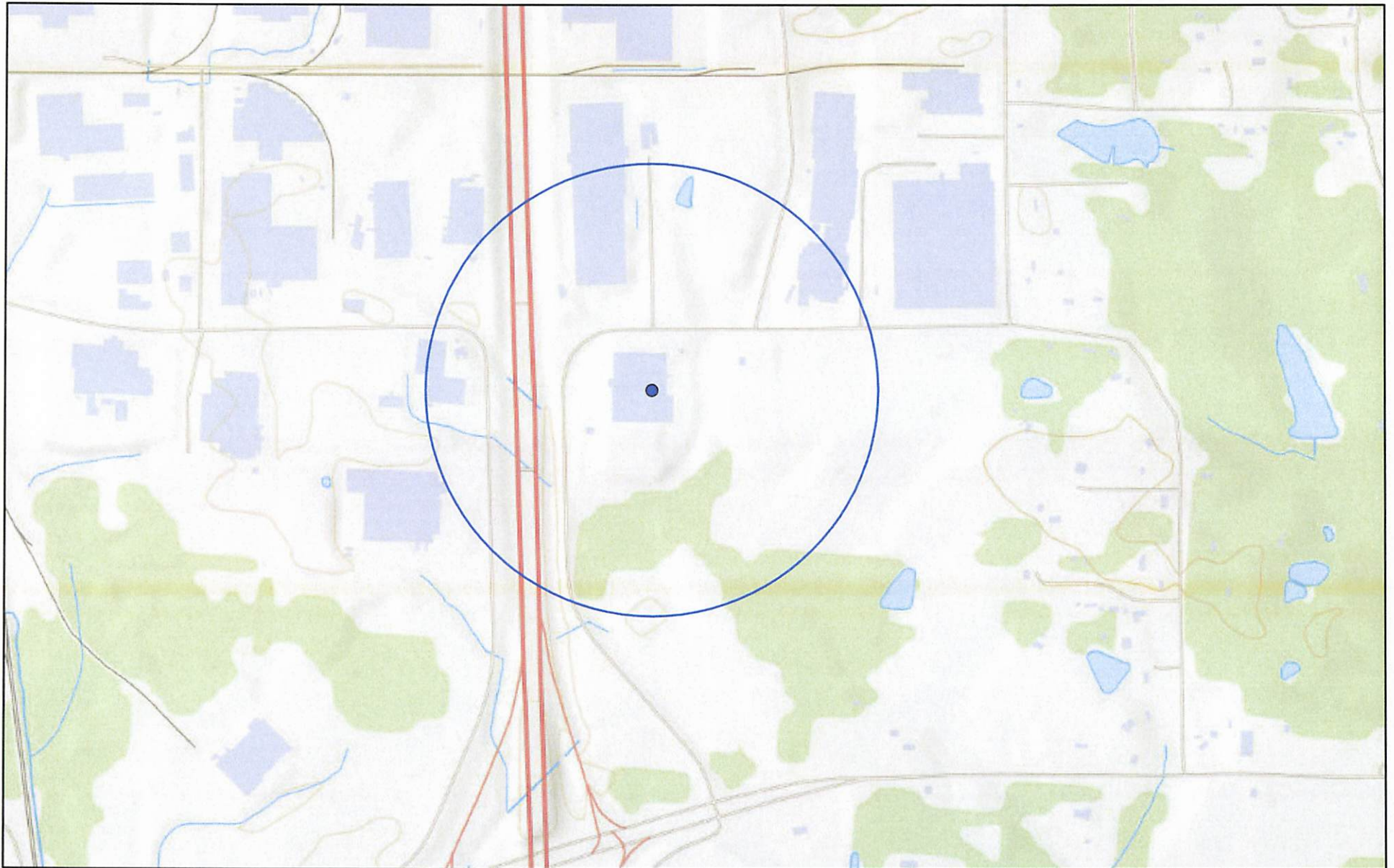


Grammer Americas-Shannon
 231 Laney Road
 Shannon, MS 38868

Legend:
 1/2-mile radius



Grammer Ag, Inc.



8/28/2025

Layers

- Red: Band_1
- Green: Band_2
- Blue: Band_3

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 Industrial Stormwater 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. [Industrial Stormwater General Permit ACT5 T-3 (4)]

Date of Spill	Material Spilled	Quantity Spilled (specify units)	Area that Spill Occurred	Did the Spill Result in a Discharge?	Injury / Property Damage?	Person(s) Involved In Clean-up	Date Reported to MDEQ (If significant)
Corrective Action(s) Taken							
Date of Spill	Material Spilled	Quantity Spilled (specify units)	Area that Spill Occurred	Did the Spill Result in a Discharge?	Injury / Property Damage?	Person(s) Involved In Clean-up	Date Reported to MDEQ (If significant)
Corrective Action(s) Taken							
Date of Spill	Material Spilled	Quantity Spilled (specify units)	Area that Spill Occurred	Did the Spill Result in a Discharge?	Injury / Property Damage?	Person(s) Involved In Clean-up	Date Reported to MDEQ (If significant)
Corrective Action(s) Taken							
☐ 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

MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY

FACILITY NAME:				DATE:
PHYSICAL ADDRESS:				
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				
SWPPP AND SITE MAP:	Yes	No	N/A	Findings & Remedial Action Documentation
- Is the Site Map current and accurate? - Is the SWPPP inventory of industrial activities, materials and products current?	☐ ☐	☐ ☐	☐ ☐	
VEHICLE/EQUIPMENT AREAS:				
Equipment cleaning:				
- Is equipment washed and / or cleaned using a detergent(s)? - If so, is all wash water captured and properly disposed of?	☐ ☐	☐ ☐	☐ ☐	
Equipment fueling:				
- 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?	☐ ☐ ☐ ☐	☐ ☐ ☐ ☐	☐ ☐ ☐ ☐	

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

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 collecting/examining sample (Print):	
Outfall Number/Location sample was collected:			
Was the sample collected during or immediately after a rain event? Yes or No			
Parameter	Parameter Description	Description of Sample	
Color	Is the water sample colored? Yes or No	If yes, describe the color:	
Clarity	Is the water sample clear and transparent? Yes or No	If no, describe the clarity:	
Floating Solids	Are there solids floating at the top of the sample? Yes or No	If yes, describe the floating solids:	
Settled Solids	Are there solids settled out in the bottom of the sample? Yes or No	If yes, describe the settled solids:	
Suspended Solids	Are there solids suspended in the water column of the sample? Yes or No	If yes, describe the suspended solids:	
Foam	Is there foam forming at the top of the sample? Yes or No	If yes, describe the foam:	
Odor	Does the sample have an odor? Yes or No	If yes, describe the odor:	
Oil Sheens	Does the sample have an oil sheen? Yes or No	If yes, describe the oil sheen:	
Detail any concerns noted in the visual jar sample and describe the corrective actions taken:			
<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

**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:	EVALUATION DATE:		
PHYSICAL ADDRESS:			
I. DESCRIPTION OF POTENTIAL POLLUTANT SOURCES			
<u>INDUSTRIAL ACTIVITIES</u>	Yes	No	Findings & Remedial Action Documentation
- Does the SWPPP have a list of Industrial Activities exposed to storm water? - Has the facility added any Industrial Activities that are exposed to storm water since the previous Annual SWPPP Evaluation?	☐ ☐	☐ ☐	
<u>MATERIALS AND POLLUTANTS</u>	Yes	No	Findings & Remedial Action Documentation
- Does the SWPPP have a list of materials and pollutants exposed to storm water? - Does the SWPPP have a narrative description of the materials and pollutants? - If so, does the narrative contain the following information? - Method of storage and disposal. - Management practices employed to minimize contact with storm water. - Structural and non-structural control measures to reduce pollutants in storm runoff. - Any treatment the storm water receives.	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐	
<u>SPILLS AND LEAKS</u>	Yes	No	Findings & Remedial Action Documentation
- Does the SWPPP contain a monthly updated list of spills and leaks? - Does the SWPPP contain an updated summary of all storm water sampling data including a description of associated pollutants?	☐ ☐	☐ ☐	

I. DESCRIPTION OF POTENTIAL POLLUTANT SOURCES (CONTINUED)

<u>SITE MAP</u>	Yes	No	Findings & Remedial Action Documentation
• Does the SWPPP have a site map showing the property layout with site boundaries?	☐	☐	
• If so, does the site map indicate the following features?			
○ Surface water bodies.	☐	☐	
○ Drainage area of each storm outfall by number.	☐	☐	
○ Direction of flow for each drainage area.	☐	☐	
○ Location and description of existing structural and non-structural control measures to reduce the pollutants in storm runoff.	☐	☐	
○ Location of any storm water treatment activities.	☐	☐	
○ Location of any storm drain inlets.	☐	☐	
○ Location of industrial activities, such as:	☐	☐	
a) Fuel storage and dispensing locations.			
b) Vehicle/equipment repair, maintenance, and cleaning areas.			
c) Materials storage and handling areas.			
d) Loading/unloading areas.			
e) Process or manufacturing areas.			
○ Location of housekeeping practices.	☐	☐	
○ Storm water conveyances (ditches, pipes, & swales).	☐	☐	

II. DESCRIPTION OF STORM WATER MANAGEMENT CONTROLS

<u>POLLUTION PREVENTION MANAGER/COMMITTEE</u>	Yes	No	Findings & Remedial Action Documentation
• Does the SWPPP specify individual(s) responsible for developing the SWPPP and assisting the facility manager in its implementation, maintenance, and revision?	☐	☐	
• If so, have there been any changes in the personnel listed since the previous Annual SWPPP Evaluation?	☐	☐	

<u>RISK IDENTIFICATION AND MATERIAL INVENTORY</u>	Yes	No	Findings & Remedial Action Documentation
• Does the SWPPP assess the pollution potential of various sources at the facility including loading and unloading operations; outdoor storage, manufacturing or processing activities; significant dust or particulate generating processes and on-site disposal practices?	☐	☐	
• If so, have there been any changes in operations or sources of potential pollutants since the previous Annual SWPPP Evaluation.?	☐	☐	

II. DESCRIPTION OF STORM WATER MANAGEMENT CONTROLS (CONTINUED)

	Yes	No	Findings & Remedial Action Documentation
<u>SEDIMENT AND EROSION PREVENTION</u> - Does the SWPPP identify areas with a high potential for soil erosion, and specify prevention measures to limit erosion? - If so, have there been any changes to the facility which would increase the potential for soil erosion since the previous Annual SWPPP Evaluation?	☐ ☐	☐ ☐	
<u>PREVENTIVE MAINTENANCE</u> - Does the SWPPP contain a preventive maintenance program to insure the inspection and maintenance of storm water management devices? - If so, does the program specify protocol for inspecting and testing of equipment to preclude breakdowns or failures that may cause pollution?	☐ ☐	☐ ☐	
<u>GOOD HOUSEKEEPING</u> - Does the SWPPP describe and list practices appropriate to prevent pollutants from entering storm water from industrial activities due to poor housekeeping? - If so, do the practices describe or list the following: - Designated areas for equipment maintenance and repair. - Provisions for waste receptacles at convenient locations. - Provisions for regular collection of waste. - Adequately maintained sanitary facilities. - 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. - Secondary containment for raw material stockpiles.	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐ ☐	
<u>SPILL PREVENTION AND RESPONSE PROCEDURES</u> - Does the SWPPP identify potential spill areas and their drainage points? - Does the SWPPP specify material handling procedures and storage requirements? - Does the SWPPP have procedures for cleaning up spills? - Have there been any changes at the facility in potential spill areas and/or their drainage points since the previous Annual SWPPP Evaluation?	☐ ☐ ☐ ☐	☐ ☐ ☐ ☐	
<u>EMPLOYEE TRAINING</u> Does the SWPPP specify periodic training for personnel that are responsible for implementing and/or complying with the requirements of the SWPPP? (see ACT14)	☐	☐	

II. DESCRIPTION OF STORM WATER MANAGEMENT CONTROLS (CONTINUED)

<u>ILLCIT CONNECTIONS EVALUATION AND CERTIFICATION</u>	Yes	No	Findings & Remedial Action Documentation
- 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?: - Method of evaluation, date(s), observation point(s), and result(s).	☐ ☐ ☐	☐ ☐ ☐	
<u>ROUTINE VISUAL SITE INSPECTIONS</u> - 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?	☐ ☐ ☐	☐ ☐ ☐	
<u>STORM WATER MANAGEMENT</u> Does the SWPPP provide for the management of storm water volume through its diversion, infiltration, storage or re-use?	☐	☐	
III. NON-STORM WATER DISCHARGE MANAGEMENT			
<u>NON-STORM WATER MANAGEMENT</u> - 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?	☐ ☐ ☐	☐ ☐ ☐	
IV. FACILITY CHANGES			
<u>SWPPP AMENDMENT</u> 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? If so, amend the SWPPP and submit it to the MDEQ within 30 days of amendment. (ACT9 S-1 (4))	☐	☐	

V. MONTHLY INSPECTION SUMMARY (Previous 12 months)

DATE (mm/dd/yy)	TIME	ANY DEFICIENCIES?		IF YES, WERE CORRECTIVE ACTIONS TAKEN?		INSPECTOR(S)
		YES	NO	YES	NO	

SWPPP EVALUATION CERTIFICATION STATEMENT AND SIGNATURE:

SWPPP Evaluation and Certification: This section must be completed by the person who conducted the SWPPP evaluation prior to submitting this form to the person with signature authority or a duly authorized representative.

"I certify that this report is true, accurate, and complete to the best of my knowledge and belief."

Name-Printed	Signature	Title	Date

RO/DAR CERTIFICATION AND SIGNATURE**Permittee-Certification:**

- ☐ The SWPPP is in compliance with the terms and conditions of the Baseline Industrial Storm Water General Permit.
- ☐ The SWPPP is out of compliance with the terms and conditions of the Baseline Industrial Storm Water General Permit. The SWPPP will be amended and submitted to MDEQ within 30 days of amendment.

"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 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."

Printed Name of person with Signature Authority or a Duly Authorized Representative¹	Signature of person with Signature Authority or a Duly Authorized Representative¹	Date

¹A person is a Duly Authorized Representative only if 1) the authorization is made in writing and submitted to the permit board by a person described in ACT 16 T-9 ["Signatory Requirements"], and 2) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated activity, such as: manager, operator of a well or well field, superintendent, person of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company.



October 1st, 2025

CERTIFIED MAIL No.

MDEQ
Attn: Permit Division
Industrial Storm Water Permitting
P.O. Box 2261
Jackson, MS. 39225

RECEIVED
OCT 08 2025
Dept. of Environmental Quality

RE: Application for MDEQ Baseline Storm Water Permit

Dear Agency:

Please find enclosed the application for Mississippi Department of Environmental Quality Storm Water Baseline Permit for our industrial manufacturing facility in Shannon, MS. Included in this permit application package is the Pollution Prevention Program, Facility Inventory, Maps, and Notice of Intent.

If you have any questions concerning the attached information, please feel free to call our technical contacts EHS Manager, Mike Berry, at (662) 397-8803.

CRB Clemmer

Sincerely,

Paul Ward

Paul Ward
Plant Manager
Grammer Inc.
231 Laney Rd
Shannon, MS 38868

CC. EHS Concepts, LLC

Grammer, Inc.

231 Laney Rd
Shannon, MS 38868
County: Lee



(SWPP) Storm Water Pollution & Prevention Plan (SPCC) Spill Prevention Control & Countermeasures Plan

August 2025



Prepared By:
EHS Concepts, LLC
1020 North Gloster Street, #202
Tupelo, MS 38804