AI: 1330
MSR002512

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED
SEP 26 2023
MDEQ

INDUSTRIAL STORMWATER NOTICE OF INTENT (ISNOI)

FOR COVERAGE UNDER THE INDUSTRIAL STORMWATER GENERAL NPDES PERMIT MSR00 2512

(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: Atom Saverse Position: Vice President

Owner Company Name: Five Star Products, Inc.

Owner Street (P.O. Box): 2 Enterprise Drive Suite 303

Owner City: Shelton State: CT Zip: 06484

Owner Phone Number: (203)800-6631 Owner Email: saversea@fivestarproducts.com

OPERATOR INFORMATION (if different than owner)

Operator Contact Name: James Tate Position: General Manager

Operator Company Name: Five Star Products, Inc.

Operator Street (P.O. Box): 109 Ford Street

Operator City: Pontotoc State: MS Zip: 38863

Operator Phone Number: (662)722-0168 Operator Email: tatej@fivestarproducts.com

OC

FACILITY INFORMATION

Facility Name: Five Star Products, Inc.

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

SIC Code: 3 0 8 6 Plastics Foam Products

Receiving Stream: Donaldson Creek

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: 109 North Ford Street **City:** Pontotoc

County: Pontotoc **Zip:** 38863

Latitude: 34 **degrees** 14 **minutes** 59 **seconds** **Longitude:** 88 **degrees** 58 **minutes** 42 **seconds**

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

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.
Styrene and Dimethyl Phthalate

STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

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):**

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Dept. of Environmental Quality

How will sanitary sewage be collected and treated? N/A

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.

Signature[1] (Must be signed by operator when different than owner)

14 SEPT 2023
Date Signed

Atom Saverse
Printed Name[1]

Vice President
Title

[1]This 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

INDUSTRIAL STORMWATER NOTICE OF INTENT (ISNOI)

August 31, 2023

Ms. Carrie Barefoot, P.E.
Manager, 401/Stormwater Branch
Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39225

Re: Industrial Stormwater Notice of Intent and Storm Water Pollution Prevention Plan
Five Star Products, Inc.
109 North Ford Street
Pontotoc, Mississippi (Pontotoc County)

Dear Ms. Barefoot:

Five Star Products, Inc. (Five Star) retained the services of Environmental Compliance & Safety, Inc. (ECS) to prepare the Industrial Stormwater Notice of Intent (ISNOI) forms and a Storm Water Pollution Prevention Plan (SWPPP) for the above-referenced facility. Enclosed you will find the ISNOI forms and SWPPP that reflects facility operations and includes storm water best management practices. This SWPPP has been developed to comply with the Mississippi Department of Environmental Quality (MDEQ) Industrial Storm Water General Permit requirements.

If you have any questions concerning the ISNOI or SWPPP, please feel free to contact James Tate of Five Star at (662) 722-0168 or me at (662) 840-5945.

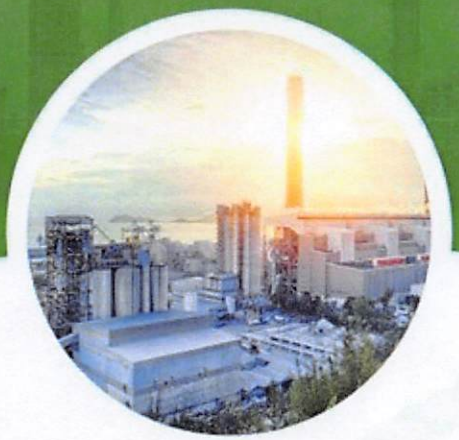
Sincerely,

Cindy Hunsucker

Cindy Hunsucker
Project Manager

Enclosures

INDUSTRIAL STORM WATER POLLUTION PREVENTION PLAN (SWPPP)



FIVE STAR PRODUCTS, INC.
109 Ford Street
Pontotoc, Mississippi 38863

Post Office Box 356 | Sherman, Mississippi 38869
Office: (662) 840-5945 | Fax: (662) 840-5965
www.envirocomp.net

"FOR ALL YOUR ENVIRONMENTAL AND SAFETY CONSULTING NEEDS."

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FIGURES:

APPENDICES:

RECORD OF REVISIONS

Revision Date	Reason for Revision	Revised Pages, Tables, Figures, or Appendices	Person(s) Responsible for Revisions
8/31/2023	Developed SWPPP to comply with Mississippi Industrial Storm Water General Permit For Industrial Activities.	Entire document.	Cindy Hunsucker (ECS) Brian Ketchum (ECS)

1.0 INDUSTRIAL STORM WATER POLLUTION PREVENTION PLAN (SWPPP) 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.

Signature

9-19-23
Date

James Tate
Name (Printed)

General Manager
Title

Five Star Products, Inc.
Company

The Industrial Storm Water Pollution Prevention Plan (SWPPP) was prepared in accordance with sound engineering practices and identifies potential sources of pollution, which may reasonably be expected to affect the quality of storm water discharges associated with industrial activity from the facility. The SWPPP describes and ensures the implementation of best management practices, which will reduce pollutants in storm water discharges and assure compliance with the terms and conditions of the Industrial Storm Water General Permit. The information presented herein constitutes a true and accurate representation of the information, findings, and observations made during the site investigation and preparation of the plan.

8/31/2023
Date

Brian Ketchum, P.E.
Team Leader, Project Engineer
Environmental Compliance & Safety, Inc.

State of Mississippi
Registration No. 13372
(Seal)

2.0 SWPPP OVERVIEW

2.1 Introduction

Federal Regulations codified in 40 CFR 122, 123, and 124 require facilities with storm water discharges associated with certain industrial activities to apply for permit coverage in accordance with the National Pollutant Discharge Elimination System (NPDES). Storm water discharges associated with industrial activities include, but are not limited to, storm water discharges from industrial plant yards; material handling sites; storage and maintenance of material handling equipment; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials and intermediate and final products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water. Material handling activities include storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product, by-product or waste product. Industrial activities do not include areas located on plant lands separate from the plant's industrial activities, such as office buildings and accompanying parking lots as long as the drainage from the excluded areas is not mixed with storm water drained from the above described areas.

Five Star Products, Inc. (Five Star), located at 109 Ford Street, Pontotoc, Mississippi, is classified under Standard Classification Code (SIC) 3086 Plastics Foam Products. Based on this SIC Code(s), the facility is considered to be engaging in "industrial activity" under 40 CFR 122.26(b)(14) and has the potential to discharge storm water associated with industrial activities; therefore, the facility is subject to the requirements to obtain an NPDES permit and prepare an Industrial Storm Water Pollution Prevention Plan (SWPPP).

Five Star has prepared a SWPPP for operations at the Pontotoc, Mississippi facility. This SWPPP was developed and will be implemented in accordance with the requirements of the Mississippi Department of Environmental Quality (MDEQ) Industrial Storm Water General Permit For Industrial Activities (Industrial Storm Water General Permit) under the NPDES Wastewater Program. The SWPPP follows the guidelines presented in the MDEQ *SWPPP Guidance Manual for Industrial Facilities.*

The SWPPP identifies potential sources of pollution that may affect the quality of storm water discharges associated with industrial activity, evaluates the risk of storm water discharges from these sources, and presents the management practices that will be used at the facility for minimization of pollutants in storm water discharges. All reports and certifications required by the Industrial Storm Water General Permit will be signed by a responsible corporate officer or duly authorized representative who has responsibility for the overall facility operations or overall responsibility for environmental matters. The SWPPP will be retained onsite at all times and made available upon request to an authorized representative of the MDEQ and/or United States Environmental Protection Agency (EPA). The SWPPP will be amended whenever there is a change in construction, operation, maintenance, or footprint of the facility that may affect the

discharge of storm water.

2.2 General Information

Site Name:		Five Star Products, Inc.					
Mailing and Physical Address:		109 Ford Street, Pontotoc, Mississippi 38863					
Location (GPS):		Latitude:	34° 14' 58.91" N		Longitude:	88° 58' 42.32" W	
SWPPP Contact:		James Tate, General Manager					
Office:	(800) 243-2006	**Cell:**	(662) 722-0168	**Email:**	tatej@fivestarproducts.com		
Storm Water Outfalls:							
SW001		**Latitude:**	34° 14' 56.31" N		**Longitude:**	88° 58' 43.64" W	
SW002		**Latitude:**	34° 14' 56.47" N		**Longitude:**	88° 58' 46.24" W	
SW003		**Latitude:**	34° 15' 0.50" N		**Longitude:**	88° 58' 45.55" W	
SW004		**Latitude:**	34° 15' 1.35" N		**Longitude:**	88° 58' 38.90" W	
Closest Water Body and Route of Entry:		Unnamed tributary to Donaldson Creek					
Is the receiving stream identified on the Section 303(d) List of Impaired Water Bodies?		No	**Has a TMDL been completed for the receiving stream?**		No		
Discharge to Municipal Separate Storm Sewer System (MS4)?		No	**If yes, name MS4:**		N/A		

2.3 SWPPP Objectives

The objective of the storm water program is to control water pollution associated with storm water discharges, and the goal of the storm water program is to improve water quality by reducing the amount of pollutants contained in storm water runoff from industrial sites. Industrial facilities subject to the requirements of a NPDES storm water discharge permit must prepare and implement a SWPPP. The objectives of the SWPPP are to:

- Identify potential sources of pollution and associated risk, which may affect the quality of storm water discharges;
- Describe best management practices (BMPs) and control measures intended to minimize pollutants in the facility's runoff; and
- Provide practical guidance for implementing the SWPPP and complying with the terms and conditions of the Industrial Storm Water General Permit.

2.4 SWPPP Elements

In order to meet the requirements of the Industrial Storm Water General Permit, the subsequent sections of the SWPPP contain the following elements:

- **Section 3.0: Facility Information** – Describes site characteristics, facility operations, site security, and site drainage.

- **Section 4.0: Storm Water Pollution Prevention Team** – Facility personnel identified as being responsible for implementing, maintaining, and revising the plan.

- **Section 5.0: Significant Exposed Materials and Control Measures** – Identifies and describes existing industrial activities and significant materials exposed to storm water, as well as specifies potential pollutants which may be present in storm water runoff. Best management practices, including both structural and non-structural controls, are also identified.

- **Section 6.0: BMP Schedules and Procedures** – Identifies schedules and procedures for implementing best management practices, including good housekeeping practices, preventive maintenance, spill prevention, and routine inspections for preventing and addressing potential materials and equipment exposed to storm water.

- **Section 7.0: Annual Facility Inspection and SWPPP Evaluation** – Procedures are outlined for conducting the Annual Facility Inspection and SWPPP Evaluation.

- **Section 8.0: SARA Title III, Section 313 Facility Requirements** – Identifies additional requirements associated with Section 313 water priority chemicals.

- **Figures:** Includes Site Location Map, Aerial Map, and Storm Water Flow Diagram with site boundaries, buildings, process and storage areas, storm water outfall locations, and flow directions.

- **Appendices:** Includes the Monthly Inspection/Visual Evaluation Report, Monthly Visual Jar Test Inspection Form, Monthly Spill & Leak Log Sheet, Employee Training Log, Annual SWPPP Evaluation Form, Non-Storm Water Discharge Evaluation, and the Industrial Storm Water General Permit For Industrial Activities.

3.0 FACILITY INFORMATION

3.1 Site Characteristics

Five Star is located on 109 Ford Street in Pontotoc, Mississippi. The entire site encompasses approximately six (6) acres. Approximately 46 percent of the property is covered by impervious material (concrete, asphalt, and metal roofing), and the remaining 54 percent is covered with grass or natural vegetation. Approximately 48,757 square feet of manufacturing operations are covered under roof. The facility operations fall primarily within Standard Industrial Classification (SIC) Code 3086, Plastics Foam Products. The adjacent properties are used for industrial and residential purposes. The Site Location Map, Figure 1, is a topographic map showing the area in which the site is located. An aerial site map is provided as Figure 2 – Aerial Map. The property boundary and storm water outfalls of the site are defined in Figure 3 – Storm Water Flow Diagram. Figure 3 details the main production site showing the boundaries, buildings, storage areas, other exposed materials, storm water outfall locations, and storm water flow directions.

3.2 Process Description

Five Star operates a fiberglass manufacturing operation. The typical open mold spray lay-up process begins as open molds are sprayed with a thin tack coat of resin. A layer of fabric is then applied, followed by resin, fabric, and resin again. A layer of gelcoat may be applied if required by a specific order. The resin material is marine grade, which provides high strength and corrosion resistance. A catalyst is used in the process to initiate polymerization of the liquid resin into solid. The molds are left open while the materials cure (e.g., react and harden). After curing, the products are removed from the molds. Excess material is removed by saws and the products are lightly sanded to produce the finished product. Product irregularities are repaired as needed.

3.3 Site Security

Access to the property is limited to Ford Street. The remaining sides of the property are protected by natural barriers (e.g., wooded buffers and hillside) and a fence from an adjacent property. Equipment and buildings are locked and secured during periods when facility employees are not present. The facility will be occupied during normal business hours by plant personnel. All visitors to the facility must check in with the front office before proceeding to other areas of the facility property. At least one employee will be available at the facility during all hours of operation, and at no time will Five Star Products, Inc. be open for business without an employee in attendance and directly supervising site activities.

3.4 Site Drainage and Storm Water Outfalls

The site is not located in a flood plain or flood-prone area. The site is designed and graded to route storm water to drainage ditches along the north and west site perimeters. Storm water runoff exits the site at four (4) outfall locations. The buildings, exposed areas, storm water flow directions, and storm water outfall locations are shown on Figure 3, and the outfalls are further detailed below:

Outfall	Drainage Area	Drainage Type & Direction	Receiving Body
SW001	*Roof Drainage, Employee Parking, Shipping/Receiving, and Metal and Equipment Laydown.* Storm water that falls on the south and east portion of the property.	Storm water sheet flows to the southeast into a drainage ditch running along Ford Street to SW001.	Unnamed tributary to Donaldson Creek.
SW002	*Roof Drainage, Shipping/Receiving, Metal and Equipment Laydown, and Employee Parking.* Storm water that falls on the south and southwest portion of the property.	Roof drainage is piped underground to outfall SW002 from Shipping/Receiving drain. Storm water flows overland and pavement to the south end of the property to SW002.	Unnamed tributary to Donaldson Creek.
SW003	*Roof Drainage, Product Storage, Empty Resin Tanks, Waste and Scrap Containers, and Air Compressors.* Storm water that falls on the northwest portion of the property.	Storm water sheet flows away from the Manufacturing building to the west and northwest of the property.	Unnamed tributary to Donaldson Creek.
SW004	*Roof Drainage, Empty Resin Tanks, Employee Parking, and Product Storage.* Storm water that falls on the north and northeast portion of the property.	Sheet flow away from the exposed areas north and northeast to a drainage ditch to SW004.	Unnamed tributary to Donaldson Creek.

3.5 Allowable Non-Storm Water Discharges

The Industrial Storm Water General Permit contains provisions for allowable non-storm water discharges. Allowable non-storm water discharges include fire-fighting activities, hydrant flushing, potable water sources, washing buildings without detergents, pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred, incidental windblown mists from cooling towers, and air conditioning or compressor condensate (i.e., uncontaminated condensate). These types of discharges may occur from time to time but will be monitored during routine inspections.

ALLOWABLE NON-STORM WATER DISCHARGES		
Non-storm water discharges allowed by the Industrial Storm Water General Permit	Expected	
	Yes	No
Discharges from actual fire-fighting activities	☐	☒
Fire hydrant flushings	☒	☐
Water used to control dust	☐	☒
Potable water sources including uncontaminated water line flushing	☐	☒
Routine external building wash down that does not use detergents	☐	☒

ALLOWABLE NON-STORM WATER DISCHARGES		
Non-storm water discharges allowed by the Industrial Storm Water General Permit	Expected	
	Yes	No
Pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed) and where detergents are not used	☐	☒
Uncontaminated air conditioning or compressor condensate	☒	☐
Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but NOT intentional discharges from the cooling tower (e.g., "piped" cooling tower blowdown or drains)	☐	☒
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	☒	☐
Water used to wash vehicles where detergents are not used	☐	☒

4.0 STORM WATER POLLUTION PREVENTION TEAM

The Storm Water Pollution Prevention (SWPP) Team is responsible for development, oversight, implementation, maintenance, and revisions to the SWPPP. The members of the team include the SWPP Team Leader and other representatives designated by the SWPP Team leader. Designated SWPP Team Members will be familiar with management and operations of the facility. The SWPP team members, title, and responsibilities are identified below:

Name	Title	Responsibilities
SWPP Team Leader		
James Tate	General Manager	❑ Coordinates SWPPP development and implementation. ❑ Conducts inspections/sampling and maintains records. ❑ Oversees "good housekeeping" efforts. ❑ Monitors waste management and chemical storage. ❑ Participates in the annual review to assess SWPPP effectiveness. ❑ Ensures SWPPP revisions are completed as necessary. ❑ Ensures annual SWPPP training is conducted. ❑ Signatory Responsibilities for the SWPPP.
SWPP Team Members		
Atom Saverse	Vice President	❑ Signatory Responsibilities for the SWPPP. ❑ Overall responsibility for the Storm Water Program. ❑ Participates in the annual review to assess SWPPP effectiveness.
Steven Chambers	Lead Estimator	❑ Conducts inspections/sampling and maintains records when team leader is out. ❑ Helps enforce "good housekeeping" efforts. ❑ Participates in the annual review to assess SWPPP effectiveness.

5.0 SIGNIFICANT EXPOSED MATERIALS AND CONTROL MEASURES

5.1 Materials Exposed and Best Management Practices

The following table details significant materials that are potentially exposed to storm water, the resulting potential pollutants, the Best Management Practices (BMPs) implemented, and the storm water discharge location. The BMPs below address those practices used to minimize contact of the exposed materials and pollutants with storm water.

ID No.	Exposed Material	Potential Pollutant(s)	BMPs Implemented [1]	Outfall(s)
1	Product Storage	Solids and total suspended solids (TSS)	Area is routinely inspected for material which could potentially affect storm water or cause a discharge of objectionable materials. Solids found in the area will be immediately disposed of.	SW003 SW004
2	Empty Fuel/Resin Tanks	TSS, metal, oil and grease	Area is routinely inspected for material which could potentially affect storm water or cause a discharge of objectionable materials. Solids found in the area will be immediately disposed of. Routine inspections and periodic cleaning of containment area.	SW003 SW004
3	Employee Parking	Oil, grease, anti-freeze, fuel, and TSS	Contaminants may be present due to incidental leaks, spills, or other causes. Area is routinely inspected for releases that could potentially affect storm water. Any significant spills will be cleaned immediately with absorbent materials (containment).	SW001 SW002 SW004
4	Shipping/Receiving	Oil, grease, antifreeze, fuel, and TSS	Area is routinely inspected for releases. Materials or spills will be immediately cleaned to prevent possible exposure to storm water.	SW001 SW002
5	Metal and Equipment Laydown	Metals, oil, and grease	Conduct routine inspections and collect scrap metal in bins to be recycled.	SW001 SW002 SW003
6	Waste and Scrap Metal Containers	TSS, oil, and grease.	Contaminants may be present from waste disposed of, and non-hazardous spillage disposed of in the dumpsters. Any liquid materials disposed of are to be in a closed and sealed container. The area will be routinely inspected to ensure all debris is contained within the dumpsters and no releases have occurred. Materials or spills will be immediately cleaned to prevent possible exposure to storm water. Only scrap material free of accumulated oils and grease (i.e., cardboard, wood, etc.) are placed in the container. The container is routinely emptied to avoid overfilling or	SW003 SW004

ID No.	Exposed Material	Potential Pollutant(s)	BMPs Implemented [1]	Outfall(s)
			prolonged exposure. Solids found in the area will be immediately disposed of.	
7	Air Compressors	Oil and Grease	Equipment is maintained in good condition and routinely serviced in a covered location. Incidental leaks or spills will be cleaned immediately with absorbents.	SW003

[1] All areas of exposed materials are inspected routinely per the requirements of the permit.

5.2 Structural and Nonstructural Controls

Existing structural and nonstructural storm water controls utilized to minimize effects on storm water runoff are listed below:

- Leaks and spills will be cleaned up as soon as possible using dry methods such as absorbent materials (i.e., oil-dri, absorbent pads, etc.). Spill kits are kept in critical locations to provide quick response to spills;
- Employee training is provided at a minimum every calendar year to inform facility personnel about potential sources of contamination at the facility and best management practices for reducing or eliminating storm water pollution;
- Materials spilled during transfer and storage areas will be inspected and cleaned up as soon as practical; and
- Routine facility housekeeping is performed to cleanup site areas and to remove debris and other miscellaneous trash from the facility. See Section 6.1 for additional housekeeping practices.
- Drainage ditches and culverts are maintained to provide adequate storm water flow to prevent erosion or ponding on site;

5.3 List of Significant Spills or Leaks

Significant spills or leaks are defined by federal regulations as a release within a 24-hour period of a hazardous substance or oil in an amount equal to, or in excess of, a reportable quantity listed in 40 CFR Part 117 and 40 CFR Part 302. Regardless of whether spills or leaks are considered significant, a log of all spills and leaks is maintained in the **Monthly Spill & Leak Log** found in **Appendix C.**

SITE SPILL HISTORY	**YES**	**NO**
Have any materials been spilled, leaked, or otherwise accidentally released in significant quantities to storm water drains or ditches in the past five (5) years? If "yes", provide a description of such spills below.	☐	☒

5.4 Summary of Existing Storm Water Sampling Data

As of the date of this Plan, no storm water sampling has been conducted. However, jar test samples will be collected as required by the Industrial Storm Water General Permit.

6.0 BMP SCHEDULES AND PROCEDURES

Storm water management measures and controls, or best management practices (BMPs), are implemented to minimize the potential release of pollutants into storm water. BMPs have been established based on risk identification, assessment, and material inventory of potential pollutant sources at the site. The facility's BMPs are discussed in detail in Section 5.0. In this section, schedules and procedures for implementing the measures and controls are discussed further.

6.1 Good Housekeeping

Good housekeeping practices are intended to maintain areas in a clean and orderly manner. General housekeeping and cleaning activities are performed daily when the facility is operating. These practices generally involve limiting the exposure of potential pollution sources to storm water by removing or covering the source and by conducting daily cleanup. The following are part of the good housekeeping program:

- **Chemicals, Raw Materials, and Products**

  All chemicals, raw materials, and products are stored in a neat and orderly manner. Floors are swept and wastes are collected and disposed of properly and containment areas are cleaned and any accumulated precipitation removed promptly. Site inspections (inside and outside areas) are conducted on a routine basis.

- **Cleaning, Washing, and Degreasing**

  No cleaning, washing, or degreasing by the use of chemicals or detergents of any type shall be performed in outside areas where the drainage could conceivably reach a storm water system.

- **Facility Unloading Areas**

  Facility truck unloading areas will be routinely inspected and cleaned of any associated debris or incidental releases. Waste will be recycled or disposed of regularly and transported to an approved landfill.

- **Outdoor Material Storage**

  Outdoor storage/material areas will be routinely inspected and cleaned of any debris or solids. Waste will be recycled or disposed of regularly through an approved waste handler. Paved areas are also inspected to ensure surfaces are free of accumulated dust, sediment, and debris.

- **Waste Receptacles**

  Waste receptacles for general trash are maintained closed when not in use or are positioned in covered areas where accidental spills or precipitation cannot result in potential storm water contamination. Receptacles are routinely emptied to prevent overfilling, and waste is disposed of at a permitted municipal solid waste facility.

- **Drainage System Maintenance**

  Drainage ditches, storm water controls, and outfalls will be routinely inspected for visible sheen or other signs of contamination.

- **Erosion Control**

  The site will be routinely inspected for signs of erosion, and eroding areas will be stabilized by necessary means.

6.2 Preventive Maintenance

Preventive maintenance inspections are performed in conjunction with the Monthly Inspection/Visual Evaluation Report. The facility's preventive maintenance includes inspection, testing, and maintenance of equipment that could fail or leak, and, when possible, is conducted inside the buildings to eliminate exposure to storm water. Examples include inspections of oil-containing equipment (such as forklifts) for leaks. In addition, facility grounds are routinely inspected for solid waste disposal, erosion, and other signs of potential storm water contamination.

6.3 Spill Prevention and Response

Potential pollution sources are inspected on a regular basis. Based on current facility processes and the types and quantities of chemicals stored, the potential for a significant spill or release of a hazardous substance is minimal. Liquid products stored onsite are typically limited to acetone, resin, gelcoats, and catalysts. However, if a release occurs, corrective actions will be taken immediately to contain and cleanup the release. Safety Data Sheets (SDS) will be used as the guide for appropriate personal protective equipment (PPE) and spill response. Spill response equipment is maintained onsite and includes items such as absorbents, brooms, and/or shovels to cleanup small spills or releases that may occur at the site. Released material, contaminated soils, debris, or other material will be promptly removed and disposed of in accordance with Federal, State, and Local requirements. All affected employees will be informed of their responsibilities for responding to releases. At a minimum, based on requirements of the Industrial Storm Water General Permit, the following steps must be completed:

1. The facility will notify the National Response Center at (800) 424-8802, the Mississippi Emergency Management Agency at (601) 933-6362 or (800) 222-6362, MDEQ at (601) 961-5171, and local responders as soon as facility personnel first become aware of a significant release. MDEQ must be notified by phone within 24 hours of discovery of the discharge.

2. A written submission, including a description of the event; the cause; the date and time; the duration of the event; whether or not the problem has been corrected and the steps taken or planned to reduce, eliminate and prevent recurrence, will be submitted to the MDEQ within five (5) working days of the time the facility first became aware of the circumstances.

3. This SWPPP will be amended within 30 calendar days of knowledge of the release if existing BMPs are deemed ineffective in controlling the release of pollutants. The amendment will include a description of the incident, as well as, new BMPs to minimize the potential of the incident recurring, if possible. In addition, the SWPPP will be amended within 30 days whenever there is a change in construction, operation, or maintenance that may result in storm water contamination.

If a significant release does occur or site changes affect the SWPPP, the SWPP Team Leader or his/her designee is responsible for ensuring that these requirements are satisfied. Any spills are recorded on the **Monthly Spill & Leak Log Sheet** in **Appendix C**. If no spills have occurred during the month, the **Monthly Spill & Leak Log Sheet** in **Appendix C** shall be completed by checking the available box and signing it as indicated.

6.4 Routine Visual Inspections

Routine visual site inspections will be conducted to ensure that storm water discharges are free from objectionable characteristics in observable amounts (i.e., turbidity, color, sheen, etc.). All areas, including parking areas, exposed product/material storage areas and drainage structures, contributing to storm water discharges associated with exposed industrial activity will be inspected. These areas will be checked by a member of the SWPP Team for evidence of pollutants entering the site drainage system and for identifying conditions which may cause contamination of storm water runoff. All drainage structures and areas containing exposed materials as specified in Section 5.1 will be included in the routine visual inspections.

Routine visual site inspections will be performed as often as needed but no less than once monthly **(See inspection form in Appendix A)**. If and when feasible, the inspections will be conducted during or after storm events. As part of any inspection conducted during or after a storm event, storm water will be collected in a clean, clear jar and examined (see **Monthly Visual Jar Test Inspection Form** in **Appendix B**) in a well-lit area for the purpose of identifying obvious industrial storm water pollution such as color, lack of clarity, floating solids, settled solids, suspended solids, foam, odor, and oil sheens. Should any objectionable characteristics described above be observed, an investigation upstream from the sample location will be conducted to identify the potential sources of pollution and corrective actions will be implemented as needed.

A record of all routine visual site inspections will be maintained onsite with the SWPPP and will contain the following information:

- Date of inspection;
- Name and signature of inspector;
- Observations of exposed industrial activities, equipment, and storage areas;
- Observations of facility drainage, storm water controls, and outfalls;
- Observations of jar test results, and observations of upstream investigations, if required;
- Description of concerns or problem conditions observed; and
- Description of corrective actions needed, personnel responsible for implementing corrective action, anticipated time frame for implementing corrective actions, and date corrective actions were implemented.

A record of all jar test observations will be maintained onsite with the SWPPP and will contain the following information:

- Date and time of inspection;
- Name and signature of inspector;
- Observations of jar test results, and observations of upstream investigations, if required;
- Description of concerns or problem conditions observed; and
- Description of corrective actions needed, personnel responsible for implementing corrective action, anticipated time frame for implementing corrective actions, and date corrective actions were implemented.

The results of all inspections and associated corrective actions will be included with the **Annual SWPPP Evaluation Form** provided in **Appendix E** and kept with the SWPPP.

6.5 Employee Training

Effective management of storm water pollution will require site personnel responsible for implementing and/or complying with the SWPPP to be familiar with conditions that may cause pollution. Furthermore, day-to-day use of BMPs by employees is essential for the success of the SWPPP. The designated SWPP Team Leader will be responsible for ensuring the implementation of the guidelines established in the Industrial Storm Water General Permit and the SWPPP and for employee training that is to include the following elements:

- Housekeeping and pollution prevention requirements;
- Spill prevention and response procedures;
- Identification and elimination of non-allowable, non-storm water discharge;
- Installation, maintenance and inspection of erosion and sediment controls for any construction activities;
- Installation, maintenance, and inspection BMPs;
- Procedures for conducting monthly inspections, jar tests, and any required monitoring;
- Recordkeeping, reporting, and record retention requirements;
- Release reporting and non-compliance notification and reporting requirements; and
- Standard requirements of the Industrial Storm Water General Permit.

Training is required to be conducted at least annually, and training documentation is provided in the Employee Training Log Form in Appendix D. Newly hired employees will be trained in the responsibilities of storm water management prior to performing such duties, and annually thereafter, by December 31st of each calendar year. Regular feedback regarding the implementation and maintenance of the SWPPP is encouraged from all site personnel. The SWPP Team members will evaluate the effectiveness of the training program annually and make improvements as necessary to promote employee awareness.

6.6 Non-Storm Water Discharge Certification

The Industrial Storm Water General Permit prohibits virtually all non-storm water discharges unless specifically allowed by the general permit (see Section 3.5) or by a NPDES direct discharge wastewater permit. As required by the Industrial Storm Water General Permit, the site must certify at least every five (5) years that storm water discharges have been evaluated for the presence of non-allowable, non-storm water discharges. The certification shall include method(s) of evaluation, date(s), observation point(s) and result(s). The evaluation method(s) may include, but not be limited to, one or more of the following dry weather screening methods: 1) visual inspection, 2) plant schematic review, and 3) dye testing. A **Non-Storm Water Discharge Evaluation Form** addressing the dry weather observation of industrial activities, storm water drainage, and outfalls (SW001 - SW004) is provided in **Appendix F**. The observation revealed

no non-storm water discharges from the facility. Additionally, non-storm water discharges will be monitored during the routine inspections.

6.7 Sediment and Erosion Controls

The vegetated areas (primarily seasonal grasses) of the site are maintained to prevent erosion and minimize the loss of sediment due to storm water runoff. Areas with high potential for soil erosion during construction activities will be identified. Methods such as using grading, berming, or curbing will be implemented to prevent runoff of contaminated flows and divert run-on away from these areas during construction activities. Also, materials, equipment, and activities will be located so that potential leaks and spills are contained or able to be contained or diverted before discharge. Concrete surfacing along the facility entrance, parking areas, and operation areas serve to eliminate or reduce erosion. The SWPP Team regularly inspects drainage ditches, swales, and basins for erosion and will stabilize questionable areas as needed.

6.8 Storm Water Discharge Limitations

Non-numeric limitations of the permit require storm water discharges to be free from the following:

- Debris, oil scum, and other floating materials other than trace amounts;
- Eroded soils and other materials that will settle to form objectionable deposits in receiving waters;
- Suspended solids, turbidity, and color at levels inconsistent with receiving waters; and
- Chemicals in concentrations that would cause a violation of State Water Quality Criteria in receiving waters.

6.9 Storm Water Treatment

Storm water from the facility is not treated prior to discharge.

7.0 ANNUAL FACILITY INSPECTION AND SWPPP EVALUATION

7.1 Annual SWPPP Evaluation

The Annual SWPPP Evaluation will be conducted by December 31st of each year and will 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 will be submitted to MDEQ in accordance with Condition ACT7, S-1(4). The results of the monthly inspections and sampling will be documented each month and used to complete the **Annual SWPPP Evaluation Form** found in **Appendix E**.

7.2 SWPPP Update

The SWPPP will be updated to include potential sources of storm water contamination identified during the inspections and not already included in the plan, as well as any additional BMPs or control measures needed to control new or existing sources of storm water contamination. The amended plan will be submitted to MDEQ within thirty (30) days of amendment of the plan. The SWPPP will also be updated if the facility is notified by the Executive Director of MDEQ that the SWPPP does not meet minimum requirements. The update will be submitted within thirty (30) days of the notification by MDEQ, along with a certification that the requested changes have been made.

7.3 Noncompliance Reporting

In the event of anticipated, or unanticipated, non-compliance with the Industrial Storm Water General Permit, the following procedures will be followed:

(1) **Unanticipated Noncompliance** – The coverage recipient will notify MDEQ orally within twenty-four (24) hours from the time that he, or she, becomes aware of unanticipated noncompliance followed by a written notice to the MDEQ within five (5) working days. The written report must describe the cause; exact dates and times; steps taken or planned to reduce, eliminate, or prevent reoccurrence of the noncompliance and if noncompliance has not ceased, the anticipated time for correction.

(2) **Anticipated Noncompliance** – The coverage recipient will give at least ten (10) days advance notice to MDEQ, if possible, before any planned noncompliance with the permit.

(3) **Other Noncompliance** – The coverage recipient shall report all instances of noncompliance not reported under paragraph (1) above, within 30 days from the end of the month in which the noncompliance occurs. The report shall describe the cause, the exact dates and times, steps taken or planned to reduce, eliminate, or prevent reoccurrence and, if the noncompliance has not ceased, the anticipated time for correction.

Reports must be submitted to MDEQ to the attention of: Chief, Environmental Compliance and Enforcement Division.

7.4 Retention of Records

All records, reports and information resulting from activities required by this permit will be retained by the coverage recipient, onsite, for a period of three (3) years from the date of generation. Copies of completed

Annual SWPPP Evaluation Forms, as well as the monthly inspections and sampling, will be kept with the SWPPP.

8.0 SARA TITLE III, SECTION 313 FACILITY REQUIREMENTS

8.1 Section 313 Water Priority Chemicals

There are SARA Section 313 Water Priority Chemicals (WPC) stored at the site. In addition, small quantities of WPC may be contained in various materials located throughout the facility (i.e., maintenance shop chemicals, aerosol paints, etc.), but are less than the amount that triggers Toxics Release Inventory (TRI), Form R reporting. The Safety Data Sheets (SDS) of all materials are maintained onsite. In the event that WPCs are brought onsite, this plan will be revised and the following procedures will be followed.

The SARA Section 313 Water Priority Chemicals (WPC) stored at the site include the following:

313 Chemical	Product Type	Storage Container	Area stored	Quantity
Styrene (32% in COR61-AA-345S)	Liquid	Tote	Inside the northwest side of the Manufacturing Building	~12,500 lbs
Dimethyl Phthalate (45% in Norex MEKP-9)	Liquid	Drum	Inside the northwest side of the Manufacturing Building	~250 lbs

8.2 Section 313 WPC Storage, Processing, and Handling

All WPC are stored inside buildings or under cover and are only potential pollutants during loading/unloading operations. In areas where liquid WPC are stored, processed, or handled, appropriate containment procedures and drainage control structures have been implemented and maintained to contain a potential spill or release. All WPC storage containers, piping, and process and handling equipment are compatible with the material stored and conditions of storage (e.g., pressure, temperature) and are operated to prevent discharges of WPC. Loading and unloading areas will be operated to minimize discharges of liquid WPC. Other controls may include the use and proper maintenance of drip pans where spillage may occur, such as when making or breaking hose connections, and/or strong spill contingency and integrity testing plan.

Visual inspections of the storage areas, as well as storage containers are performed to identify potential integrity problems. Signs of leakage or deterioration will be documented, and corrective action will be initiated if such signs are noted. No adverse impact to the environment from storm water contact is anticipated from the presence of WPC chemicals in the products used at the site.

8.3 Preventive Maintenance and Housekeeping

All areas containing WPC chemicals will be inspected for leaks or conditions that could lead to discharges or result in direct contact of storm water. Facility personnel will monitor such potential occurrences during normal operations and during routine visual inspections (see Section 6.4). In particular, facility piping,

pumps, storage tanks and bins, process and material handling equipment, and material bulk storage areas will be examined for any conditions or failures which could cause a discharge. Inspection shall include examination for leaks, corrosion, support or foundation failure, or other forms of deterioration or non-containment.

8.4 Facility Security

A security system has been established and implemented that prevents accidental or intentional entry, which could cause a discharge. These security measures are detailed in Section 3.3.

8.5 Training

Employee training regarding the prevention of and response to spills and discharges of WPC will be conducted ***at least annually*** (see Section 6.5).

8.6 Storm Water Monitoring

During coverage under the Industrial Storm Water General Permit, which is included in **Appendix G**, storm water discharges associated with industrial activity under SARA are subject to the monitoring requirements listed in this Section only if an EPA Form R (EPA Form 9350-1) or information gathered in completing a Form A indicates a release of WPC to storm water. No releases of WPC have occurred in the last five (5) years that would trigger sampling requirements in the Industrial Storm Water General Permit. In the event a release is reported on future Form R or Form A submittals, monitoring will be performed as described below:

Frequency of Monitoring and Type of Storm

If monitoring is required for storm water outfall(s) based on Form R reporting, sampling will be performed as close as practicable to the time of the release. The sampling event(s) will be conducted on storm(s) greater than 0.1 inches in magnitude, and occurring at least 72 hours from the previously measurable (greater than 0.1-inch rainfall) storm.

Parameters

The following parameters will be measured: pH, total suspended solids (TSS), and any Section 313 chemical reported on an EPA Form R as being released to storm water. In addition, the following information will be documented: date and duration (hours) of storm sampled, rainfall measurement (in inches) of storm which generated storm water runoff, the duration (hours or days) between the storm sampled and the end of the previous measurable (greater than 0.1-inch rainfall) storm, and an estimate of total discharge (in gallons) for the storm sampled.

Sample Collection

For each applicable outfall, one grab sample will be collected during the first thirty (30) minutes of runoff (or as soon thereafter as practicable), and one composite sample will be collected. The composite sample may be either flow-weighted or time-weighted, and may be collected using an automatic continuous sampler or as a combination of a minimum of three (3) sample aliquots taken in each hour for the first three (3) hours or entire discharge, with each aliquot being separated by a minimum period of fifteen (15) minutes.

Representative Discharge

The representative discharge would be determined based on the WPC release location.

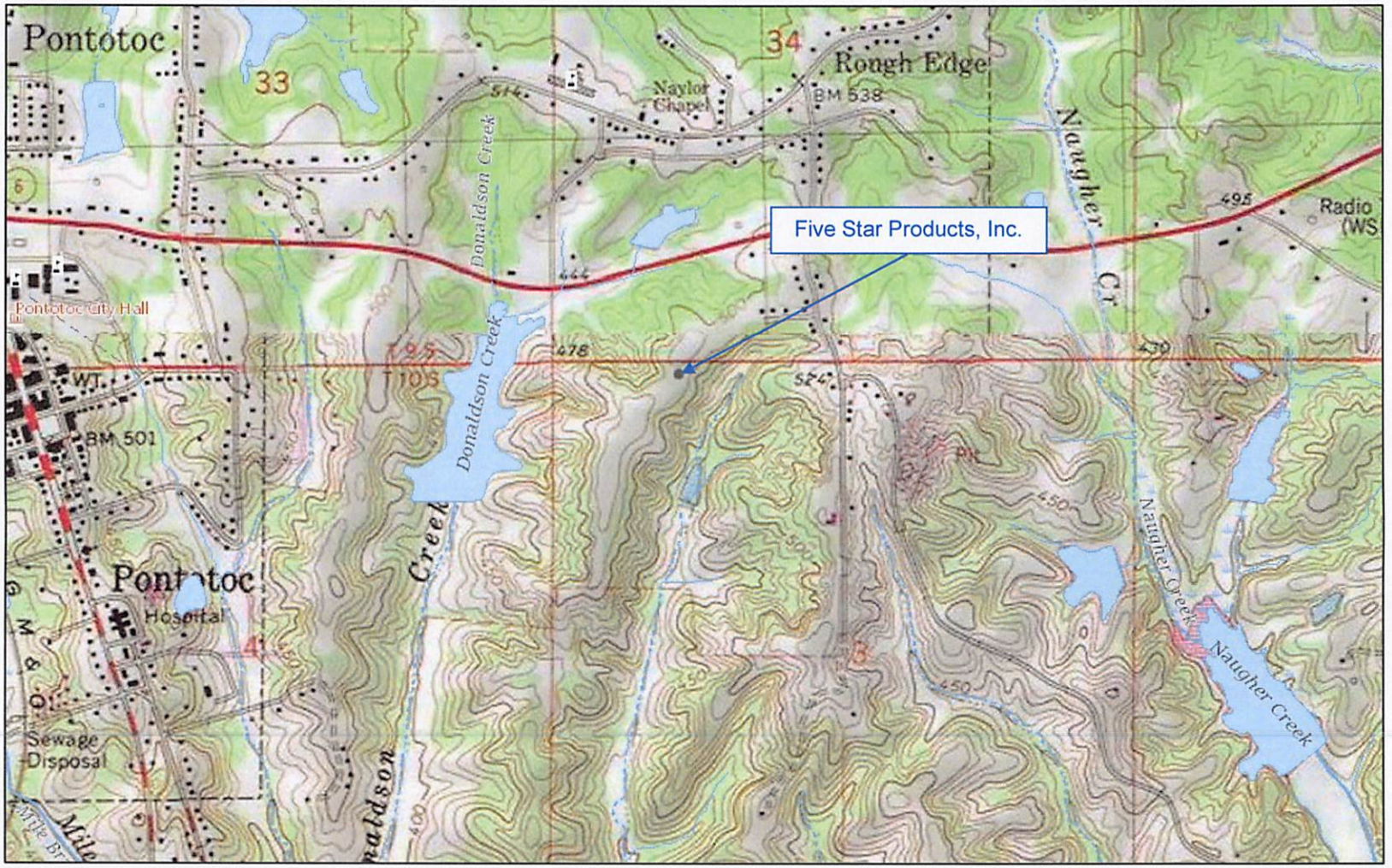
Reporting of Monitoring Results

Results of any monitoring required will be reported to MDEQ within ninety (90) days of the sampling event.

FIGURES

FIGURE 1

SITE LOCATION MAP



N

W E

S

Source:
USGS

Legend:
N/A

Drawn By/Checked By: CHH

Date: 05/02/2023

Five Star Products, Inc.
109 Ford Street
Pontotoc, Mississippi

Figure 1: Site Location Map

Environmental
Compliance & Safety, Inc.
PO Box 356
Sherman, MS 38869

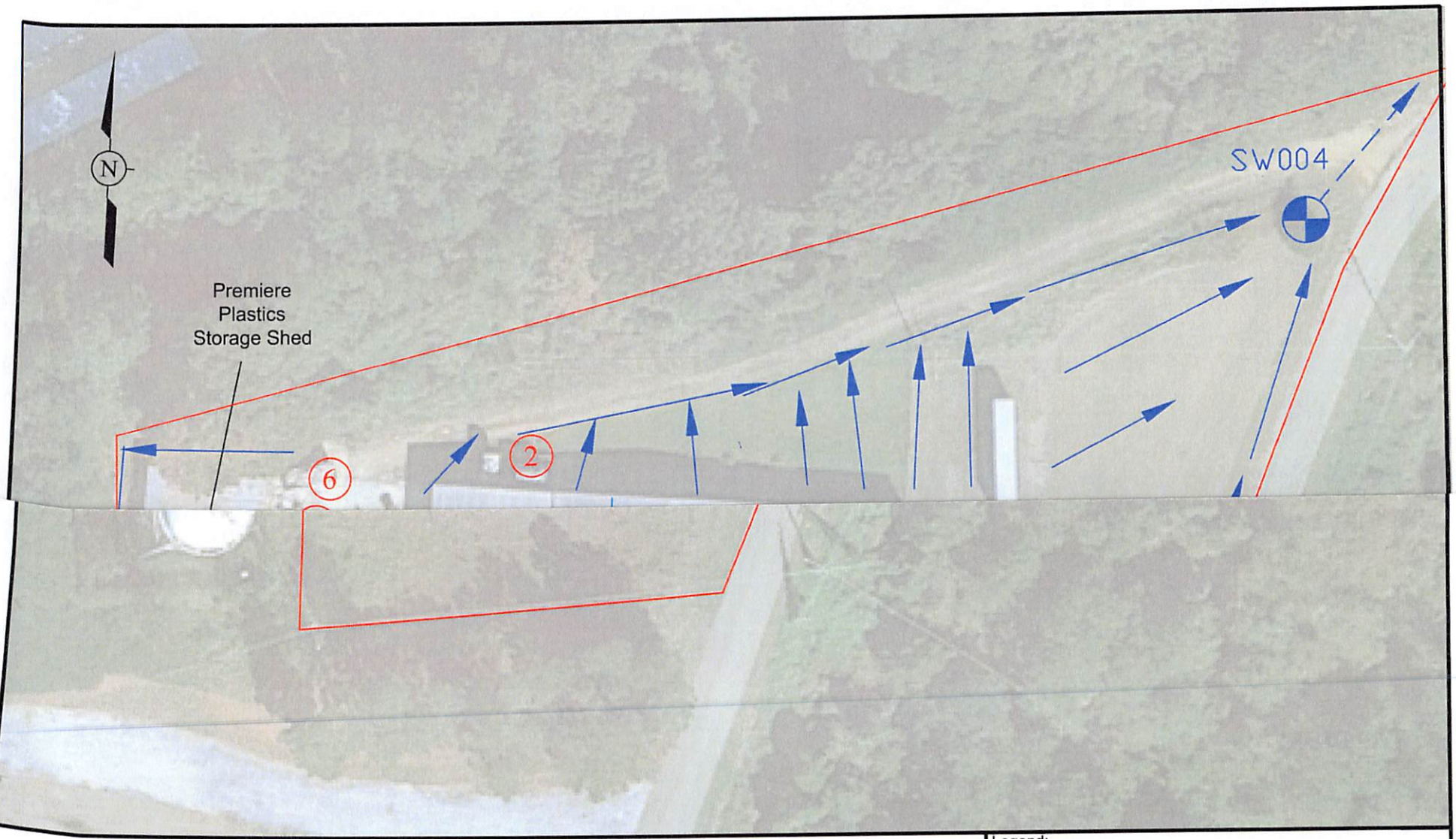
FIGURE 2

AERIAL MAP

Source: Google Earth Legend: N/A	Drawn By/Checked By: CHH	Date: 5/2/2023	Environmental Compliance & Safety, Inc. PO Box 356 Sherman, MS 38869
	Five Star Products, Inc. 109 Ford Street Pontotoc, MS 38869		
	Figure 2: Aerial Map		

FIGURE 3

STORM WATER FLOW DIAGRAM



ECS
ENVIRONMENTAL COMPLIANCE & SAFETY
P.O. Box 356
Sherman, MS 38869
(662) 840-5945

Five Star Products, Inc.
109 North Ford Street
Pontotoc, Mississippi

Storm Water Flow Diagram

Figure 3

Legend:
Surface Water Flow
Storm Drain
Exposed Material (1)
Underground Water Flow

Scale: NTS

Drawn By: CHH

Date: 8/29/23

APPENDICES

APPENDIX A

MONTHLY INSPECTION/VISUAL EVALUATION REPORT

APPENDIX B

MONTHLY VISUAL JAR TEST INSPECTION FORM

APPENDIX C

MONTHLY SPILL & LEAK LOG SHEET

APPENDIX D

EMPLOYEE TRAINING LOG

APPENDIX E

ANNUAL SWPPP EVALUATION FORM

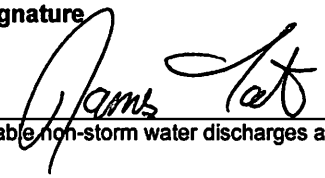
APPENDIX F

NON-STORM WATER DISCHARGE EVALUATION

NON-STORM WATER DISCHARGE EVALUATION FORM

Outfall No.	Date of Evaluation	Method Used to Test or Evaluate Discharge	If Evaluation is Impossible Give Reason	Is Non-Storm Water Being Discharged?[1] (Yes/No)	List Likely Sources of Non-Storm Water Discharges	Person(s) Who Conducted the Test or Evaluation
SW001	8/08/2023	Visual Inspection	N/A	No	N/A	Cindy Hunsucker (ECS) Ashley Kimes (ECS) James Tate (Five Star)
SW002	8/08/2023	Visual Inspection	N/A	No	N/A	Cindy Hunsucker (ECS) Ashley Kimes (ECS) James Tate (Five Star)
SW003	8/08/2023	Visual Inspection	N/A	No	N/A	Cindy Hunsucker (ECS) Ashley Kimes (ECS) James Tate (Five Star)
SW004	8/08/2023	Visual Inspection	N/A	No	N/A	Cindy Hunsucker (ECS) Ashley Kimes (ECS) James Tate (Five Star)

I certify under penalty of law that this document was 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.

A. Name & Official Title (type or print)	B. Area Code and Telephone No.
James Tate, General Manager	(662) 722-0168
C. Signature 	**D. Date Signed** 9/14/23

[1] Allowable non-storm water discharges addressed in an individual NPDES permit are not included in this evaluation.

APPENDIX G

INDUSTRIAL STORM WATER GENERAL PERMIT FOR INDUSTRIAL ACTIVITIES